



ELENGY's comments to ACER's Public Consultation on technical requirements for data reporting under REMIT

ElenGY welcomes the opportunity to take part in the ACER's Public Consultation on technical requirements for data reporting under REMIT.

ElenGY is an infrastructure operator fully dedicated to LNG terminal activity. It owns 100% of the Montoir and Fos Tonkin LNG terminals, and more than 70% of Fos Cavaou LNG Terminal.

ElenGY would like to make the following comments.

III. Questions concerning the draft RIS Guidelines

2. Do you agree that ENTSO-E and –G transparency platforms should play a crucial role in the reporting of transparency information according to Regulations (EC) No 714/2009 and (EC) No 715/2009, including network codes and guidelines, and be treated differently than other information sources?

We do not agree with the statement proposing that ENTSO-G transparency platforms should play a **crucial role** in the reporting of transparency information according to Regulations (EC) No 715/2009 as regard to LSOs' activities.

Indeed, as LNG terminal operator (LSO), we consider that with respect to information relating to LSOs' activities, the **crucial role** shall be played at a national or a European level where LSOs are considered as real stakeholders and thus are able to put forward the specificities of their activities.

For instance, we consider that GIE (Gas Europe Infrastructure association) or GLE (GIE column representing the LSOs) are much better placed than ENTO-G to play a crucial role in the reporting of transparency information according to Regulations (EC) No 715/2009 as regard to LSOs' activities. Of course, we don't see any problem, if ENSO-G would like to access and use the data provided by the GIE or GLE.