

WEBINAR

Methodology for ACER's new cost efficiency comparison of EU gas TSOs

Wednesday, 15.10.2025 10:00 - 11:00 CEST Online





Housekeeping rules



Please pose your questions using the Slido tool within Microsoft Teams

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This meeting is being recorded

Questions from other participants can be 'liked' to increase their visibility





Slides and recording of this webinar will be uploaded to ACER website



Keep your microphone muted unless the chair gives you the floor

Substance-related questions will be addressed during the relevant Q&A session; although they can be posed at any point





Agenda for today

Indicative time	ltems
10:00 - 10:10	Introductory remarks and next steps Bart VEREECKE, ACER Miguel MARTINEZ RODRÍGUEZ, ACER
10:10 - 10:40	ACER's new cost efficiency comparison of EU gas TSOs: Proposed methodology Per AGRELL, Sumicsid
10:40 - 10:55	Q&A
10:55 - 11:00	Closing remarks Bart VEREECKE, ACER Miguel MARTINEZ RODRÍGUEZ, ACER



ACER efficiency comparison (AEC): process

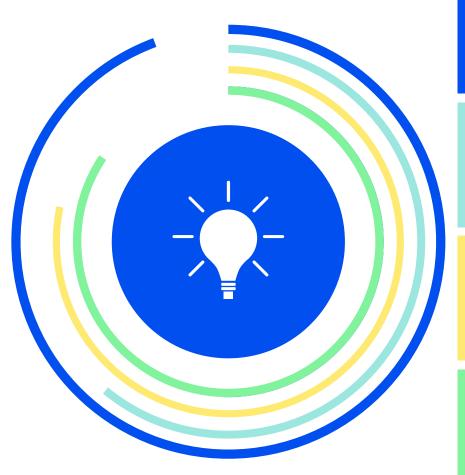
Article 19 (2) of Regulation (EU) 2024/1789: Revenue of transmission system operators

The costs of the TSO shall be subject to an efficiency comparison between TSOs. ACER shall carry out that efficiency comparison. By 5 August 2027 and every four years thereafter, ACER shall publish a study comparing the efficiency of TSOs' costs, subject to the protection of data considered by ACER to be commercially sensitive. The relevant regulatory authorities and the TSOs shall provide ACER with all the data necessary for that comparison. When periodically setting the allowed or target revenue of TSOs, the relevant regulatory authorities shall take into account such comparison and national circumstances.





AEC phase I: Stakeholder involvement







- Benchmarking adapted to the context of decarbonisation.
- Three models: Execution Static (ES), Execution Dynamic (ED) and Utilisation Dynamic (UD).
- Combined use of DEA and SFA.
- Measures to ensure comparability across TSOs.



AEC public consultation

- Wide support of measures to ensure transparency and data quality.
- Diverging views, across TSOs and market parties, on the proposed methods and models.
- Support, across market parties, for using utilization parameters.
- Support, from market parties, for instruments to compare TSOs. Critical views from TSOs.



AEC workshop

- Distinction between tariffs and TSO cost efficiency is important.
- Static vs dynamic distinction is not robust.
- AEC should consider the "uncertain" nature of data
- The NRA use of the AEC results requires additional discussion.

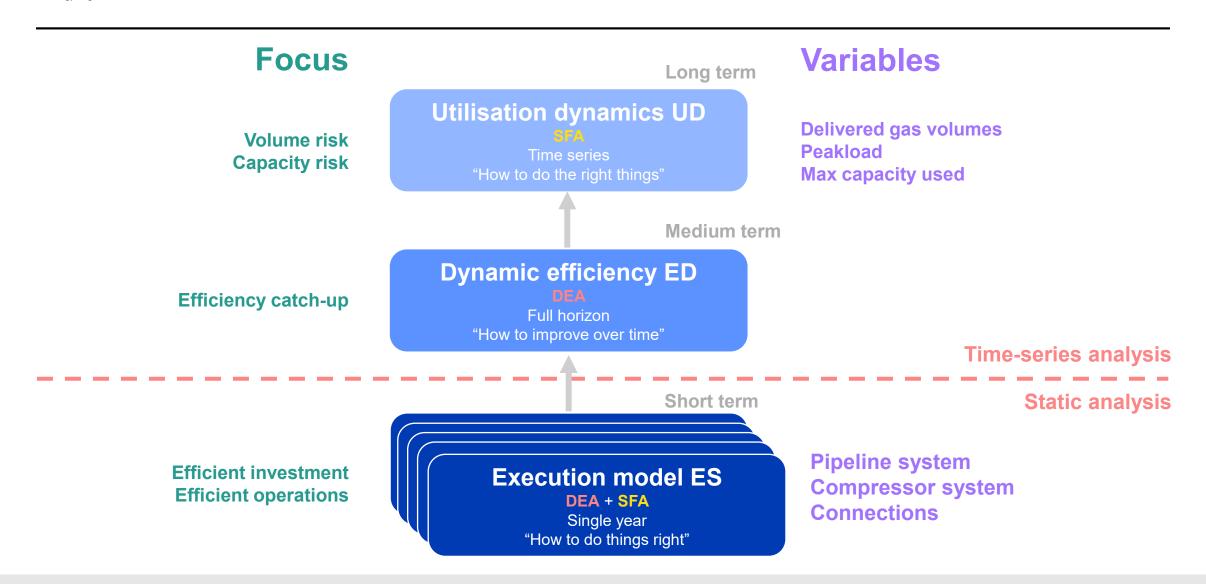


Expert Group review

- Recommendation to revise the primary / secondary method approach.
- Support to using utilization-based models
- Additional transparency on scaling factors.
- Extensive input on model specifications and on the use of the final results.



AEC execution and utilisation models





TSO benchmark in the context of decarbonisation

8. Transparency across the entire process and publication

AEC supported by extensive documentation, public results and datasets applicable to information that is not commercially/security sensitive.

7. Data quality

Phase II puts in place a robust process to ensure high quality of the data.

6. Interpretability and use

Sensitivity analyses to facilitate the use of results by NRAs.

5. Legacy investments

Measures to distinguish the efficiency of investments pre- and post- liberalization.

1. Three model approach focusing on execution and utilisation

Provides both, efficiency scores for NRA decisions and long-term utilization-based analyses

2. Robust DEA and SFA methods

Complementary use of well stablished benchmarking methods

3. Context of decarbonization

Considers key challenges (decommissioning, repurposing, reinvestments and utilization).

4. TSO comparability

Instruments to enable comparability across TSOs (e.g. perimeter of activity, price and currency differences, environmental factors).



Next steps: Data request and validation (phase II)

Data request design

Data request launch

Data audit

Data crossvalidation

Final dataset

- · Data definition.
- Data request update based on CEER's TCB21 benchmark.
- Discussion with NRAs and TSOs.
- Presentation of IT tools and protocols.
- Discussion on commercially sensitive data.

- TSOs fill in the data request.
- ACER and consultant support TSOs providing the data.
- Data request to be validated by auditor.
- ACER to provide guidelines for third party audit.
- Results of the audit to be evaluated by ACER and consultant.

- ACER and consultant to validate the data.
- First validation layer with NRAs.
- Second validation layer with TSOs.
- Process can take several interactions.
- Aggregated data shared for cross-TSO and public examination.

 Final dataset ready for phase III.

December 2025 to 2026Q4



ACER upcoming publications on **AEC** phase I

1.

ACER Summary of AEC Phase I

- Process
- Interactions
- Key design features
- Stakeholder input
- Next steps

2.

AEC Method and Process report (Sumicsid)

- Objectives
- Choice of methods
- Models
- Parameters
- Comparability
- Process

3.

Public consultation responses

 Summary of stakeholder input received for the public consultation and during the workshop. 4.

Expert Group Review

Independent
 assessment of
 the AEC public
 consultation
 documents by
 experts in the
 field of
 benchmarking.



Q&A session

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