



International
Association
of Oil & Gas
Producers

Potential future developments of the gas sector

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Intervention by IOGP
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Quo Vadis (EC) study

- Need a well founded problem definition before proposing solutions
 - IOGP is not convinced that there is a major problem with the gas market design, although implementation of the rules needs further attention
 - Tariff NC has flexibility that can be used to avoid cross-border issues
- Questionable modelling assumptions may be critical for study results
 - Fixed price of commodity long-term contracts at 2016 level
 - Limited analysis of regional specificities leads to one-size-fits-all approach
 - TSO revenue and end-user exit tariffs are fixed
 - No costs assumed for hub mergers
- Avoid that issues at national level or between single Member States are used to justify new pan-EU rules
 - Focus on effective implementation of the existing rules
 - Let's see if it works before changing the rules again

Quo Vadis scenario “Tariff reform”

- Claimed benefits of tariff reform result from modelling assumptions
 - Decreasing revenue due to cross-border tariff reduction is recovered 100% from EU entry points, and is only partially passed on to end users,
 - whereas, if the costs to the marginal supplier would increase the whole market could suffer
- Tariffs should i.a. be cost-reflective, non-discriminatory and support efficient investment
 - Recently adopted rules on incremental capacity specify economic test
 - Test determines whether network users’ binding capacity bookings justify cost of incremental capacity investment
 - Without cross-border tariffs this process is flawed
 - Also, cross-border tariffs enable network users to recover capacity costs
- Limited to regions with mature infrastructure, tariff reform could have benefits when:
 - Focus is on efficient use of existing infrastructure, not on new investments
 - Long-term capacity bookings can be managed

Quo Vadis scenario “Market merger”

- Some market mergers have undisputed benefits:
 - Merging of market areas that are well connected
 - Where at least one of the markets is considered too small to be viable
 - Benefit to the end-users exceeds the loss of cross-border tariff income (before possible reallocation of costs to entry or exit tariffs)
- There are however limits to the benefits of market mergers:
 - Merging of market areas that are not well connected result in loss of firm capacity, or require significant investments which are not market-based
 - Merging markets which are viable as stand-alone markets eliminates market response to locational signals
 - Re-allocation of costs to entry tariffs on the outside border increase the barrier to enter the merged market

Quo Vadis scenario “Delivery at EU border”

see separate IOGP kick-off intervention

Future role of gas (CEER) study

- IOGP welcomes the CEER study on the Future role of gas
 - The use of CNG and LNG in transport raises the question about the potential role of regulated entities to start-up certain activities
 - Infrastructure regulation may require adaptation for new gases
- Longer-term, the new gases might be important in a 2050 perspective
 - Biogas, bio methane, synthetic methane and hydrogen already exist, on a limited scale
 - Industry-scale applications for conversion of natural gas to hydrogen (with CCS) are feasible and could be used either for power generation or to supply hydrogen as fuel
 - This supports the case that the gas infrastructure has a role beyond 2050
- From a regulatory perspective it is important to
 - Take a pro-active approach to avoid that new developments would be facing regulatory barriers
 - Keep an open mind to the future use of the gas infrastructure



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