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**CEER Monitoring Report on
Implementation of the Transparency
Template in the European LNG
Terminals**

**Ref: C13-GWG-102-04
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INFORMATION PAGE

Abstract

This document (C13-GWG-102-04) presents CEER's monitoring of the implementation of the Transparency Template on European LNG terminal websites.

CEER considers that for users to access the services offered in LNG terminals, it is crucial that the relevant information they need is published in an organised, well-structured and harmonised manner.

In 2012, GLE-CEER launched the LNG Transparency Template, with the objective of facilitating access to LNG terminals by providing users with the information they need in an accessible way, also allowing LNG operators to comply with transparency provisions in European regulation.

In this paper, regulators report on the accuracy of European LNG operators in their implementation of the Transparency Template.

Target Audience

Shippers, European Commission, regulators, energy suppliers, traders, network operators, Member States, gas customers, gas industry, consumer representative groups, academics and other interested parties.

Keywords

LNG, LNG terminal, regasification, transparency

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Related Documents

CEER documents

- [“Guidelines for Good Third Party Access Practice for LNG System Operators \(GGPLNG\)”](#), May 2008, Ref. E08-LNG-06-03”
- [“Monitoring the implementation of GGPLNG”](#), June 2009, Ref. E09-LNG-07-03
- [“ERGEG 2011 study on congestion management procedures and anti-hoarding mechanisms in the European LNG terminals”](#), April 2011, Ref. E10-LNG-11-03b
- [“CEER Status Review and evaluation of access regimes at LNG terminals in the EU”](#), Ref. C12-LNG-15-03, 12 March 2013

External documents

- [The LNG Transparency Template](#), March 2012
- [GLE supporting document](#)
- [Regulation \(EC\) No 715/2009 of the European Parliament and of the Council of 13 July 2009 on conditions for access to the natural gas transmission networks and repealing Regulation \(EC\) No 1775/2005](#)
- [Directive 2009/73/EC of the European Parliament and of the Council of 13 July 2009 concerning common rules for the internal market in natural gas and repealing Directive 2003/55/EC](#)



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EXECUTIVE SUMMARY

Objective and scope of the report

CEER has long promoted fair competition and market access in Europe's electricity and gas sectors. Transparency when accessing Liquefied Natural Gas (LNG) terminals in Europe is a vital element required for well-functioning gas markets. More specifically, it is essential for users and market participants.

Overall, a high level of transparency is required in order to increase competition, remove entry barriers, ensure effective access to gas facilities, enhance cross-border trading and minimise information asymmetry and costs for market participants.

In 2012, the Transparency Template (TT) was launched by Gas LNG Infrastructure Europe (GLE) and CEER. The aim of the TT is to facilitate access to the information published by LNG operators, providing users with the information they need in an accessible way. The TT also allows LNG System Operators (LSOs) to comply with transparency provisions in the European regulation¹.

The TT structures the relevant information using different menus and submenus. The intention is that all LSOs adopt this common structure when providing their particular information.

This report evaluates the implementation of the TT, analysing the format, content and purpose of the template for users and customers. The report covers those Member States which have LNG terminals in operation, in total 18 terminals.

Key findings

European LNG operators have made a significant effort to implement the TT on their websites. In general, it has been **accurately implemented** in a short time (around one year); 15 out of 18 terminals have published the TT.

In order to enable users to easily find relevant information, the template needs to be clearly accessible on the LNG terminal's website. The transparency templates published are mostly located in sections of the respective LSO's website that are **easily accessible: 11 out of 15 templates** are featured on the home pages of the LSOs and all of them can be reached from GLE's home page.

In addition, the presentation and structure of the information is important to facilitate users' ability to navigate this information.

9 of 15 of the implemented templates follow the same design (macro areas and submenus) as the original model created by GLE. These are Zeebrugge, Fos Tonkin, Montoir, Barcelona, Bilbao, Huelva, Cartagena, Panigaglia and Rovigo LNG terminals.

¹ ["Regulation \(EC\) No 715/2009 of the European Parliament and of the Council of 13 July 2009 on conditions for access to the natural gas transmission networks and repealing Regulation \(EC\) No 1775/2005"](#)



The template has the **same structure** (macro areas, submenus and topics mentioned in GLE's supporting document²) in 6 out of 15 templates: Panigaglia, Rovigo, Barcelona, Cartagena, Huelva and Bilbao LNG terminals.

On average, **70% of the information** included in the TT is published to a satisfactory standard by the 15 terminals.

- The information published is considered to be **not satisfactory or not sufficient** for these topics: vetting procedures, information from port authorities, gas quality conversions, IT allowing electronic booking, secondary markets functioning and platform and capacity allocation rules in exempted terminals.
- Not much of **historical information** is available. Sometimes operational and historical information is provided together.
- It should be **noted that the level of information published in English is quite good**; only the national legislation is rarely translated.
- Many terminals provide **further information, particularly regarding** additional services.

A minority of LSOs include **links** to other operators or authorities, in particular on tariffs, ship procedures and regulation.

Accurate and up to date information is of fundamental importance for users to be well informed. Despite this, most of the templates do not show the date when information was made public. However, this useful information is available on the websites of Panigaglia, Rovigo, Grain and Spanish terminals.

Users highlighted the importance of finding the information they need easily. Our research found that topics can be accessed directly in 69% of cases. In addition, the information is published under the right submenu in similar percentage (67%).

A small number of LSOs still report "work in progress" - like many sections on the Sines website and some parts of Bilbao terminal's template.

Conclusions and Recommendations

This Monitoring Report reveals that, in general, most terminals have properly implemented the template, although there is room for improvement in a number of cases. There are 3 LSOs that have not yet implemented the voluntary template (Dragon, Sagunto and Mugardos). This report focuses on the information required under the defined TT, but recognises that the information gaps (in relation to specific terminals) noted in this report may be reported on the LSO website but through alternative formats other than TT. Regulators should work with LSOs to encourage the adoption of the TT and/ or seeking further clarifications/ additions to the information they publish on their websites.

This report's main recommendations to LSOs are:

- Ensure that the transparency template is clearly visible from their website homepages for better accessibility.

² [GLE supporting document](#)



- Publish any outstanding information currently missing from the templates.
- Align the TT structure with the model of GLE TT for consistency.
- Organise information in graphs and tables, where appropriate, to make it easier for users to process.
- Clearly state when information in the template was last updated.
- Allowing easy access to information on a particular topic while at the same time, letting users download the information in a friendly manner.

As a result of this assessment, CEER encourages LSOs to continue working to ensure full compliance with the transparency requirements and to hold regular discussions on ways to enhance the template. LSOs should also take into account not only obligations under new European rules, Network Codes (NC) and Regulations (such as Congestion Management procedures rules (CMPs), Capacity Allocation Mechanism NC (CAM), Regulation (EU) No 1227/2011 on Wholesale Energy Market Integrity and Transparency (REMIT)) but also LNG market developments and new services offered at their LNG terminals.



1. Introduction

1.1 Background

European energy regulators have dedicated significant resources over the past years to develop a common understanding and to recommend improvements on how LNG terminals operate in Europe, with the aim of promoting fair access, competition and security of supply.

In 2008, ERGEG published Guidelines for Good Third Party Access Practice for LNG System Operators (GGPLNG)³. Along the years, regulators promoted the development and harmonisation of capacity allocation mechanisms, congestion management procedures and other market tools to promote a competitive, transparent and non-discriminatory gas market in Europe.

ERGEG followed up with 2009⁴ and 2011⁵ studies. The 2011 ERGEG study was submitted to public consultation in November 2010. One of the conclusions highlighted was that terminals users were generally satisfied with the CMP rules applied, although there were several areas where regulations and procedures could be improved or further harmonised.

In 2012, CEER undertook a review of access conditions at LNG terminals. Information was collected on the rules in place, the level of capacity utilisation, spot contracting, and secondary market functioning and application of CMPs at individual European LNG terminals. As a result, CEER published a Status Review⁶ in March 2013. It focused on market evolution and terminal utilisation over the past three years (2009-2011).

The differences in the level of information available at LNG terminals across Europe were outlined in the public consultation referred in 2011. Regulators recommended that a common template be developed and implemented on each LSO website.

Even though information is made available by individual LSOs, in compliance with transparency provisions established in Regulation (EC) No 715/2009, network users may still face difficulties when evaluating opportunities to use facilities across Europe, due to differences in market models. ERGEG-CEER proposed that GLE develop a common facilitating tool that makes existing information more accessible to market participants. The Transparency Template has therefore been designed to facilitate access to LNG terminals by, among other things, making all the information available in an organised, structured and harmonised way.

Intensive work was carried out in close cooperation between GLE members and CEER. After several workshops and meetings with CEER, GLE identified the main information items that shippers were interested in when looking for access to LNG terminals, and presented these items under key relevant areas that are the backbone of the Transparency Template.

³ [“Guidelines for Good Third Party Access Practice for LNG System Operators \(GGPLNG\)”](#), Ref. E08-LNG-06-03, 7 May 2008

⁴ [“Monitoring the implementation of GGPLNG”](#), Ref. E09-LNG-07-03, 3 June 2009

⁵ [“ERGEG 2011 study on congestion management procedures & anti-hoarding mechanisms in the European LNG terminals”](#), Ref. E10-LNG-11-03b, 12 April 2011

⁶ [“CEER Status Review and evaluation of access regimes at LNG terminals in the EU”](#), Ref. C12-LNG-15-03, 12 March 2013



Moreover, GLE has taken the initiative to develop and provide a common platform giving direct access to the websites of its members, who committed on a voluntarily basis to implement the common template on their existing websites for the benefit of market participants.

Market participants were consulted, in particular at the 1st Workshop on access to European LNG terminals organised by CEER in September 2011. GLE also presented the draft Transparency Template at the 20th Madrid Forum in September 2011. After some final adjustments, GLE's proposal was finally agreed by CEER at the end of 2011/beginning 2012. The launch of GLE's Transparency Template⁷ was announced at the 21st Madrid Forum in March 2012.

More than one year after its publication, regulators have engaged in monitoring the voluntary implementation of the Transparency Template on LNG operators' websites. This Report presents the results and conclusions of this monitoring exercise, as well as recommendations to improve access to the required information in an organised, structured and harmonised manner.

1.2 Description of the GLE Transparency Template

The list of European LSOs that are GLE members is published on the GLE website. Gas LNG Europe provides direct access to its member LSOs websites where the Transparency Template is available.

The Template is structured in 8 macro areas containing 17 submenus (as shown in Table 1). Macro areas encompass information divided into submenus and topics. To facilitate the organisation of the information to be published, GLE has developed a list of topics related to each submenu. There are a total of 42 topics, which are presented in GLE's supporting document.

LSOs have implemented the Transparency Template on their websites. Through the topics related to each submenu, following the structure of the Template, the operators provide access to the information or a link to the website section where the information is already available.

⁷ [The GLE Transparency Template](#) , shown in Table 1 of this Report.



Table 1: GLE Transparency Template

	Macro Area	Submenu
1	CONTACT	Contact
2	TERMINAL CHARACTERISTICS	Facilities main characteristics
		Service Description
		LNG Quality
3	HOW TO BECOME A CUSTOMER / USER	Main steps for applying for access
		Contract information
		TSO information
		Ship procedures
4	CAPACITIES	Primary market
		Secondary market
5	TARIFF	Regulated terminals
		Exempted terminals
6	LEGAL DOCUMENTATION	Contracts/Codes
		Regulation/Legislation
7	OPERATIONAL DATA	Historical data
		Operational data
8	MISCELLANEOUS	Projects

The voluntary publication of information shall not be construed as creating any obligation to make such publication mandatory. In some cases, the signature of a confidentiality agreement may be required beforehand.

1.3 Customer perspective

Europe depends on imports for much of its gas needs, some of which reaches us in the form of LNG. This form of gas is a growing part of our energy mix in Europe helping to: 1) to ensure we have the amount of gas we need for consumption; and 2) to diversify our sources of gas so as to reduce dependence on any one provider (security of supply). It also promotes price-based competition (by virtue of having more competing sources of gas) which should ultimately translate in clearer prices for customers.



Each LNG terminal can accommodate a certain capacity of LNG for regasification and storage. Therefore, gas supplies that are processed via these terminals must be contracted (or “booked”) with the LSO. EU legislation requires these terminals to be ‘accessible’ to third parties, that is to say to shippers or other gas companies which are not associated to the company operating the LNG terminal. Regulators therefore monitor how competition - including non-discrimination, transparency of information, contracting and trading mechanisms - is functioning at LNG terminals.

While LNG infrastructure development is of key importance to secure gas supplies and to facilitate the development of competition for the benefit of end-customers, effective utilisation of LNG terminals also needs to be ensured to enhance competition and improve quality of service, in order to avoid inefficient infrastructure, since investments are generally passed on to consumers through their energy bills. LNG and LNG infrastructures contribute to Security of Supply, diversification of sources and routes and competition.

Transparency for LNG terminal users is of paramount importance in order to provide transparent, non-discriminatory and objective access to the services offered in these facilities. Non-discriminatory access will facilitate competition in the European gas market and competition will enable better choices for final consumers.

2. Methodology

The monitoring work has been done using an online questionnaire tool that has been filled in by National Regulatory Authorities (NRAs). Regulators in the Member States where terminals are located have answered the questions in order to collect information on the way LSOs have implemented the TT on their websites.

The first part of the survey was dedicated to general aspects of the terminals, such as geographic location and association with GLE. Secondly, seven questions were asked for each of the 42 topics listed in GLE’s supporting document. The objective was to assess the level of compliance with the template structure and also check whether the access to information is provided in a user-friendly manner.

The questions on each topic cover a number of issues, including: the direct access to the information required; whether the information is published under the right topic; if it is found through a link to another website and consequently, who is publishing that information; and if the information is published in English.

The seven questions are:

- A. Direct access: is the relevant topic directly found when selecting the hyperlink on the LSO website?
- B. Is all information that should be published according to this topic indeed published on the LSO website?
- C. Is the information linked to another website?
- D. Who is publishing the information? Indicate if the link is to NRA/Ministry/or other's website
- E. Does each topic provide sufficient information and is there a link to more detailed information – if existing – on the LSO website?
- F. Is all required information published in the right submenu/topic?
- G. Is this information published in English?



In addition, the possibility of commenting on every question was offered; the methodology attempts to evaluate the implementation of the Template in a standardised way.

The data received have been processed and are presented in this Report.

3. Overview of European LNG Terminals in the context of GLE Transparency Template

In Europe there are 18 LNG facilities (Table 2) in operation, located in 8 Member States. 13 of these are subject to the regulated Third Party Access (TPA) regime. These LSOs must provide third parties with access rights, under transparent and non-discriminatory conditions.

The other 5 LNG terminals (Gate, South Hook, Isle of Grain, Rovigo and Dragon) have been granted an exemption from the regulated access regime. The European legal framework offers the possibility, for new large-scale gas infrastructure or for a significant increase of capacity in existing infrastructure to obtain an exemption from TPA requirements, according to pre-defined conditions (Article 36 of Directive 2009/73/EC⁸). Nevertheless, some conditions are also imposed, for instance, to allow the utilisation of these terminals in case of under-utilisation by the primary capacity users.

Table 2: European LNG terminals in operation

8 Member States	18 LNG Terminals in operation	LSO webpages where TT is implemented
Belgium	Zeebrugge	http://www.fluxys.com/belgium/en/services/lngterminalling/lngterminalling.aspx
France	Fos Tonkin	http://www.elengy.com/en/gle-transparency-template.html
	Montoir	http://www.elengy.com/en/gle-transparency-template.html
	Fos Cavaou	http://www.fosmax-lng.com/
Greece	Revythoussa	http://www.desfa.gr/default.asp?pid=528&la=2
Italy	Panigaglia	http://www.gnlitalia.it/en/business_services/transparency_template/
	Rovigo	http://www.adriaticlng.it/wps/portal/alng/en/home
Portugal	Sines	http://www.mercado.ren.pt/gas/Paginas/default.aspx
Spain	Barcelona	http://www.enagas.es/cs/Satellite?cid=1339396521492&language=en&page_name=ENAGAS%2FPAGE%2FENAG_pintarContenidoFinal

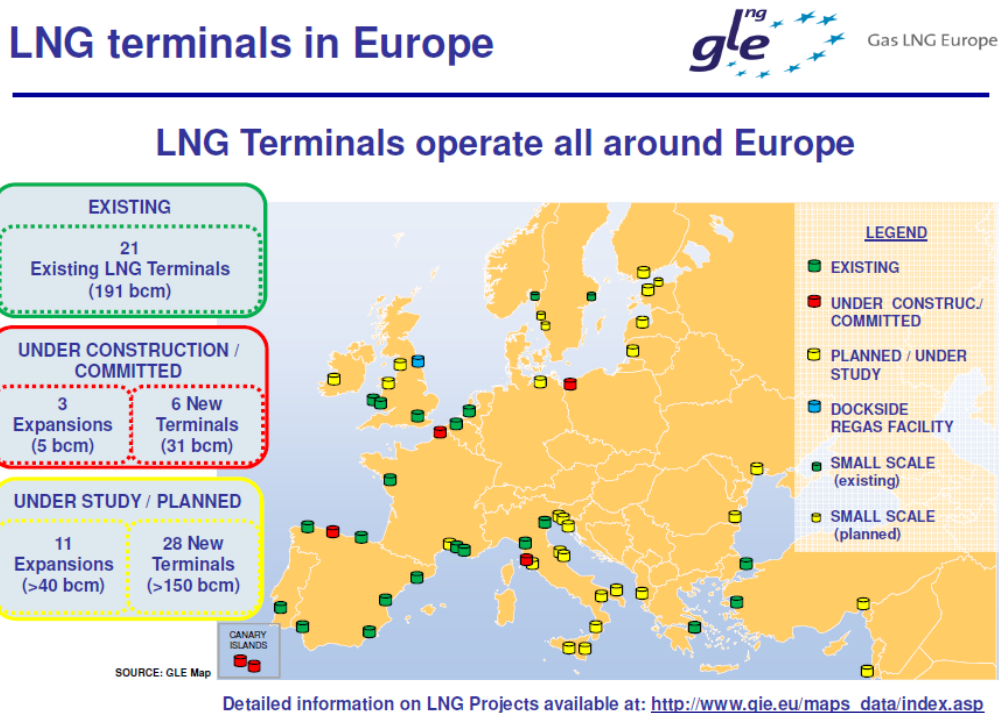
⁸ [“Directive 2009/73/EC of the European Parliament and of the Council of 13 July 2009 concerning common rules for the internal market in natural gas and repealing Directive 2003/55/EC”](#)



8 Member States	18 LNG Terminals in operation	LSO webpages where TT is implemented
	Cartagena	http://www.enagas.es/cs/Satellite?cid=1339396521492&language=en&page name=ENAGAS%2FPage%2FENAG_pintarContenidoFinal
	Huelva	http://www.enagas.es/cs/Satellite?cid=1339396521492&language=en&page name=ENAGAS%2FPage%2FENAG_pintarContenidoFinal
	Bilbao	http://www.bbg.es/Negocio/Logistica/Plantilla-de-Tranpsarencia.aspx
	Sagunto (not GLE member, no TT implemented)	
	Mugardos (recent GLE member; no TT implemented)	
The Netherlands	Gate terminal	http://www.gate.nl/transparency/terminal-characteristics.html
United Kingdom	Grain LNG	http://www.nationalgrid.com/uk/GrainLNG/GLE+Transparency+Template/
	South Hook	http://www.southhooklng.co.uk/cds-web/view.do
	Dragon (not GLE member, no TT implemented)	



Figure 1: Status of European LNG terminals



Source: GLE website

The Figure 1 shows that there are 21 existing LNG terminals in Europe since the two Turkish plants and the Excelerate project (United Kingdom) are included. In practice, 18 terminals are considered to be in operation in Europe and under the scope of this monitoring work.

The 18 LNG terminals are operated by 15 companies. 13 of those companies, operating 16 terminals, are members of GLE.

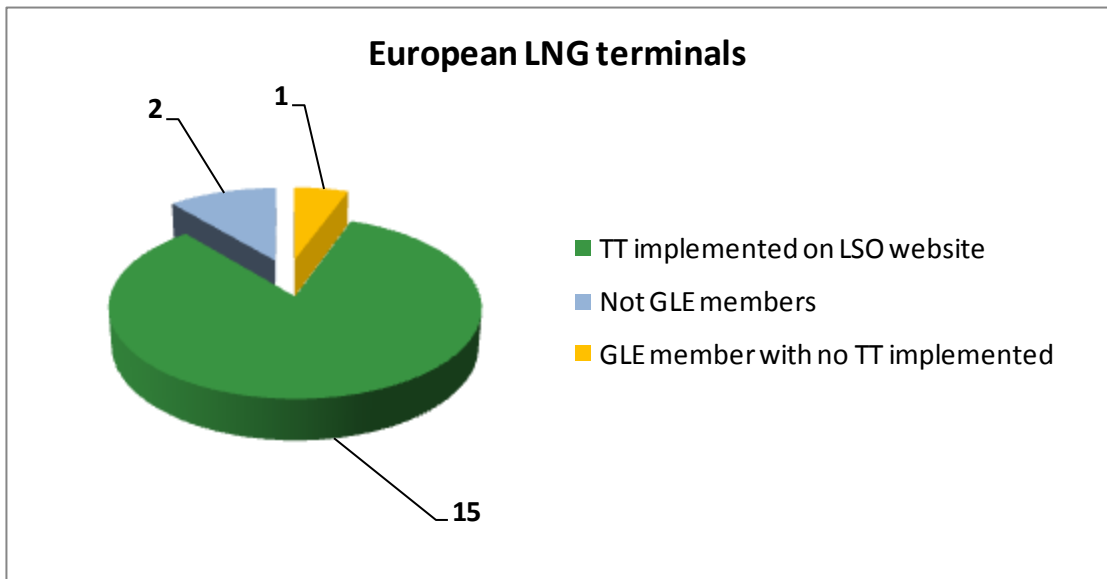
Currently, GLE has 15 members in 9 countries (1 observer).

However, 1 of the GLE members has not implemented the Transparency Template on its terminal's website.

In total, 3 operational European terminals have not implemented the GLE Transparency Template on their website (Figure 2). 2 of those terminals are located in Spain and 1 in United Kingdom.



Figure 2: European LNG terminals in operation and their relation to GLE TT



Therefore, analysis focuses on the websites of 15 terminals (currently in operation) where the TT has been implemented.

In addition, the Polish LNG terminal and the French terminal in Dunkerque have both implemented the TT on their websites, although these facilities will only be operational as of 2014 and 2015 respectively.

4. Analysis of the published information included in the Transparency Template

The analysis of the information provided through the Transparency Template is considered in terms of accessibility, data organisation and functionality, structure, completeness of information and quality of information for each issue, and whether the information is presented in a helpful, practical, useful and friendly manner.

As a general remark, plenty of quantitative and qualitative information is now provided through this tool, but some gaps have been found. A detailed analysis has been carried out and the key points of this study are outlined in the following sections, including compliance with transparency requirements, accuracy and updating of public information.

The results presented in the Figures throughout the report illustrate that whilst implementation may have occurred, the quality of how the information has been provided may need improving, particularly in terms of providing sufficient detail and in the right place (submenu).

4.1 Macro area - Contact

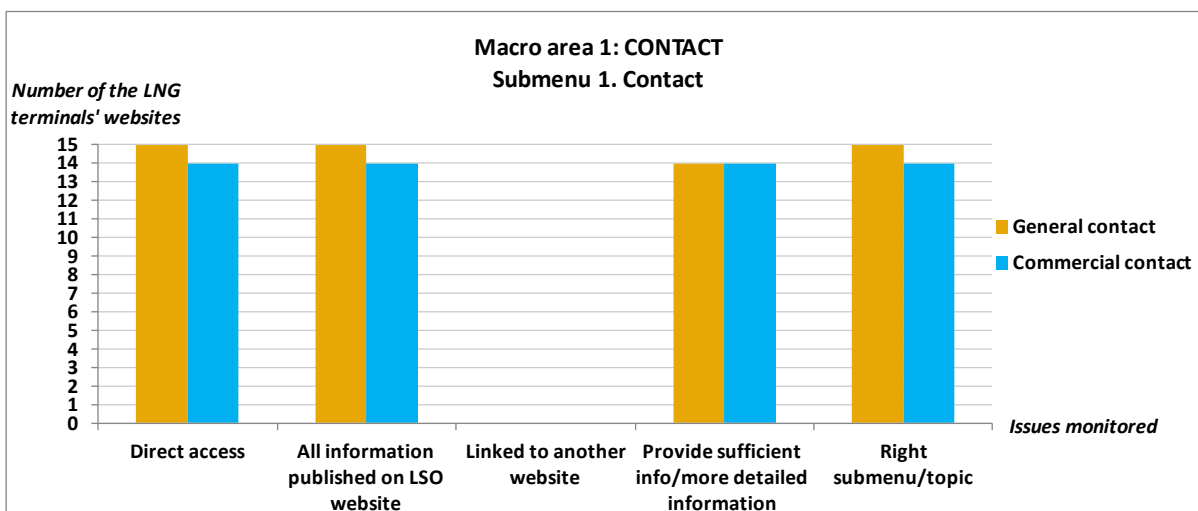
This macro area contains information describing the general and commercial contact publically available on the websites. In the TT, it is divided into 1 submenu "Contact" which has 2 topics: (1) "General contact" and (2) "Commercial contact".



All LNG terminals within the scope of this report, with the exception of South Hook, have made the information on **general and commercial contact** publically available on their websites, under the right topic, with direct access and in English.

Figure 3 below shows the implementation of the macro area “Contact” in the 15 monitored websites, according to the issues and topics (“General contact” and “Commercial contact”) monitored.

Figure 3: Implementation of the macro area “Contact” of the GLE Transparency Template



4.2 Macro area - Terminal characteristics

This macro area contains information describing the key characteristics of the terminal in question. It is divided into 3 submenus (1) “Facilities main characteristics” (2) “Services description” and (3) “LNG quality” to help users easily navigate this information. The sections below outline the key findings on the implementation of this macro area.

4.2.1 Submenu 1 - Facilities main characteristics

This submenu has 8 topics: (1) “Max Location”, (2) “Nominal annual capacity (bcm/y-d)”, (3) “LNG Storage capacity”, (4) “Number of LNG tanks”, (5) “Max LNG ship class size”, (6) “Number of jetties”, (7) “Min sea depth alongside” and (8) “Information from port authorities”.

Sines LNG terminal operator publishes the information on all the topics under the submenu, without divisions. All required information can be found, except for “Min sea depth alongside” and “Location”.

South Hook LSO has followed a similar implementation to Sines LNG terminal, however with direct access to the relevant information. The information on “Location” and “Min sea depth alongside” is also not publically available on the website.

On the Revithoussa website, information on all the topics is published in a single document. However, the information on the topics “Location”, “Min sea depth alongside”, “Max LNG ship class size” and “Information from port authorities” is not directly accessible. This information can be found on another part of the website.



Zeebrugge LSO links the information to documents/maps/sections on its own website.

On the Fos Tokin and Montoir LSO websites, the information related to “Min sea depth alongside” and “Information from port authorities” is provided under the submenu “Ship procedures” in macro area 3, “How to become a customer”.

Links to the national port authorities’ websites can be found in several terminals’ websites: Revityhousa, Panigaglia (Autorità portuale della Spezia), Rovigo (Capitaneria di Porto di Chioggia), Sines (Port authority) and Gate. Rovigo LNG terminal does not publish the information in English, indicating that: *“A courtesy English translation of the Safety Ordinance of the Chioggia Port Authority n. 63/2008 - Ordinanza di sicurezza della Capitaneria del Porto di Chioggia n. 63/2008 is available from the operator on User’s request”*.

On 4 Spanish terminal websites, there is direct access to the information on the topics under the “Facilities main characteristics” submenu, except for the 2 last topics (“Min sea depth alongside” and “Information from port authorities”). The topic on the “Information from port authorities” is missing.

The information provided by Bilbao terminal LSO is not directly accessible and some topics are not available.

The information on “Location” is published on the Grain website but not in “Facilities main characteristics” submenu.

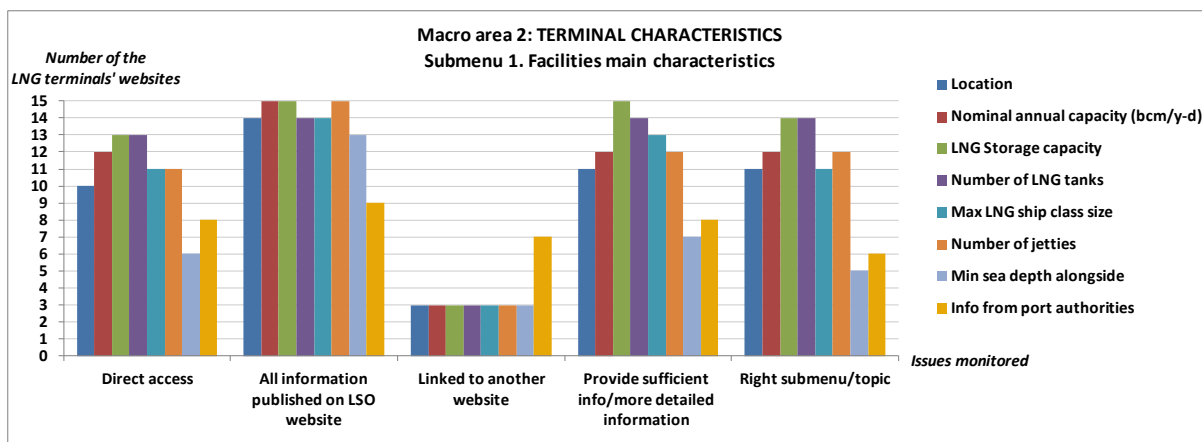
With regard to the Fos Cavou terminal, all information can be found on the website by clicking on the submenu section. The submenu has not been divided into topics (no specific hyperlink per topic), except for “Information from port authorities”.

In general, the topics under the submenu “Facilities main characteristics” are correctly implemented on the Italian LNG terminals’ websites.

Figure 4 below shows the implementation of the submenu of “Facilities main characteristics” in the macro area “Terminal characteristics” in the 15 monitored LNG terminal’s websites, according to the issues and 8 topics monitored.



Figure 4: Implementation of the submenu “Facilities main characteristics” in the macro area “Terminal characteristics” of the GLE Transparency Template



4.2.2 Submenu 2 - Services description

The submenu “Services description” has 2 topics: (1) “Basic services” and (2) “Other services”.

The section of the template containing information about **basic services** offered by LSOs is fully implemented on all websites, except for South Hook terminal.

In relation to **other services offered**, the Gate, Grain, South Hook, Revythoussa and Rovigo websites do not make publically available all pertinent data for a number of different reasons:

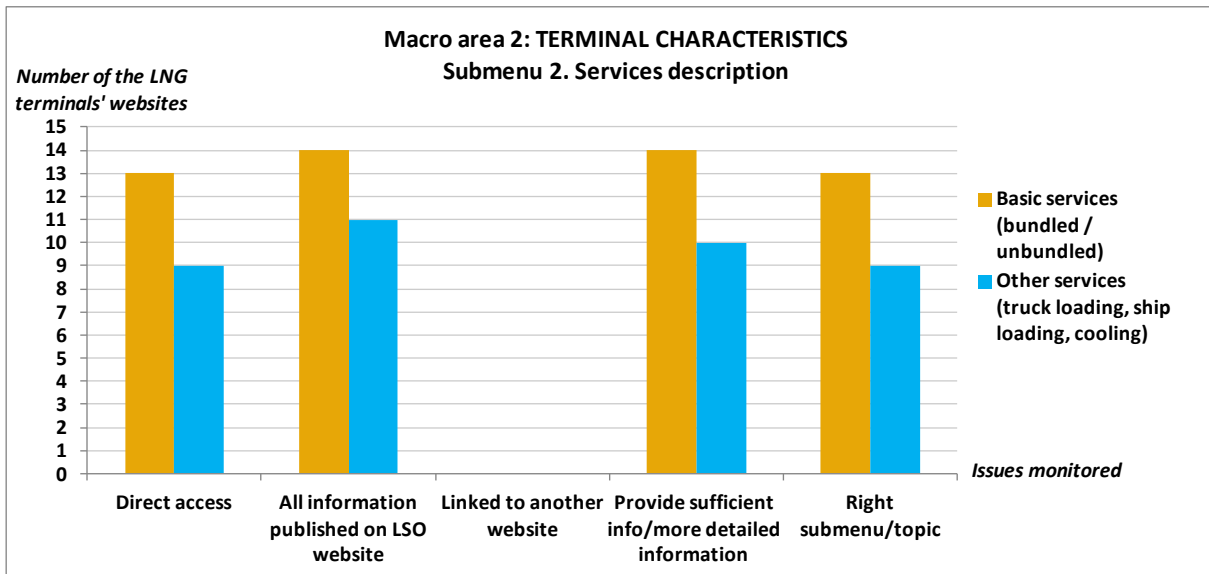
- In the case of the Italian terminal (Rovigo), the LSO does not offer other services such as truck loading, ship loading and cooling, so there are no data to be published.
- The Greek terminal (Revythoussa) offers cooling services, however this is not communicated to the market. The information is therefore not published in this topic of the template or anywhere else on their website.
- Gate LSO is developing other services such as truck loading, ship loading etc., but these services are not yet offered to customers. In the “Miscellaneous” section, Gate provides information to customers on these developments.
- Information on other services is published in another section of the Isle of Grain website. Its ancillary services are not available yet. Isle of Grain has launched an Open Season bidding process for interested parties for the development of a Road Tanker Loading Facility.

More detailed analysis of the information published about other services is presented in section 5 of this Report.

Figure 5 below shows the implementation of the submenu “Services description” in the macro area “Terminal characteristics” for the 15 monitored websites, according to the issues and 2 topics monitored.



Figure 5: Implementation of the submenu “Services description” in the macro area “Terminal characteristics” of the GLE Transparency Template



4.2.3 Submenu 3 - LNG quality

The submenu “LNG quality” has 2 topics: (1) “LNG quality specification” and (2) “Gas quality conversion equipments”.

In relation to LNG quality, the template aims to make accessible the information on gas quality accepted in the terminal and the conversion facilities if needed.

The topic on information about **LNG quality specification** is fully implemented by all European terminals, except for the South Hook and Grain websites where data is not published under the right topic. On the South Hook website, the information on LNG quality has been published in the macro area "Capacities". On the Grain website, some information on LNG quality is provided, however the language is technical and not easy to understand and does not follow the submenu structure as designed by GLE.

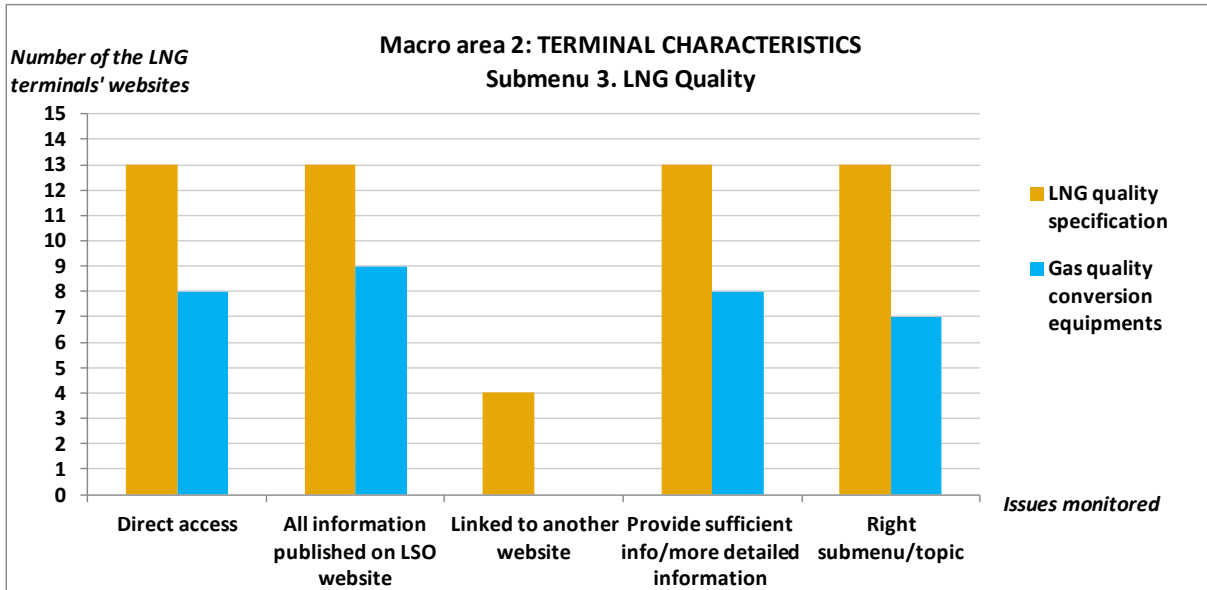
The 4 Spanish terminals have included links to the Technical System Management website with the publication of this information.

Regarding the **gas quality conversion equipments**, the 2 terminals in the UK, the 3 terminals in France, the terminal in Greece and one Spanish terminal (Bilbao) have not implemented this topic on their templates. The reason why this topic has not been implemented according to the French, Greek and Spanish operators is that they do not have conversion equipments in place, therefore no public information is needed.

Figure 6 below shows the implementation of the submenu of “LNG quality” in the macro area “Terminal characteristics” in the 15 monitored websites, according to the issues and 2 topics monitored.



Figure 6: Implementation of the submenu “LNG Quality” in the macro area “Terminal characteristics” of the GLE Transparency Template



4.3 Macro area - How to become a customer/user

Macro area “How to become a customer/user” in the Transparency Template provides important information for prospective customers/users. This macro area has 4 submenus: (1) “Main steps for applying for access”, (2) “Contract information”, (3) “Link to Transmission System Operator’s (TSO) website” and (4) “Ship procedures”. The sections below outline the key findings on the implementation of this macro area.

4.3.1 Submenu 1 - Main steps for applying for access

This submenu has 3 topics including information on: (1) “Access regime”, (2) “Access request procedures” and (3) “Contract signature and conditions”.

4 of the 15 websites have not fully implemented this submenu as designed in the template (with all information topics).

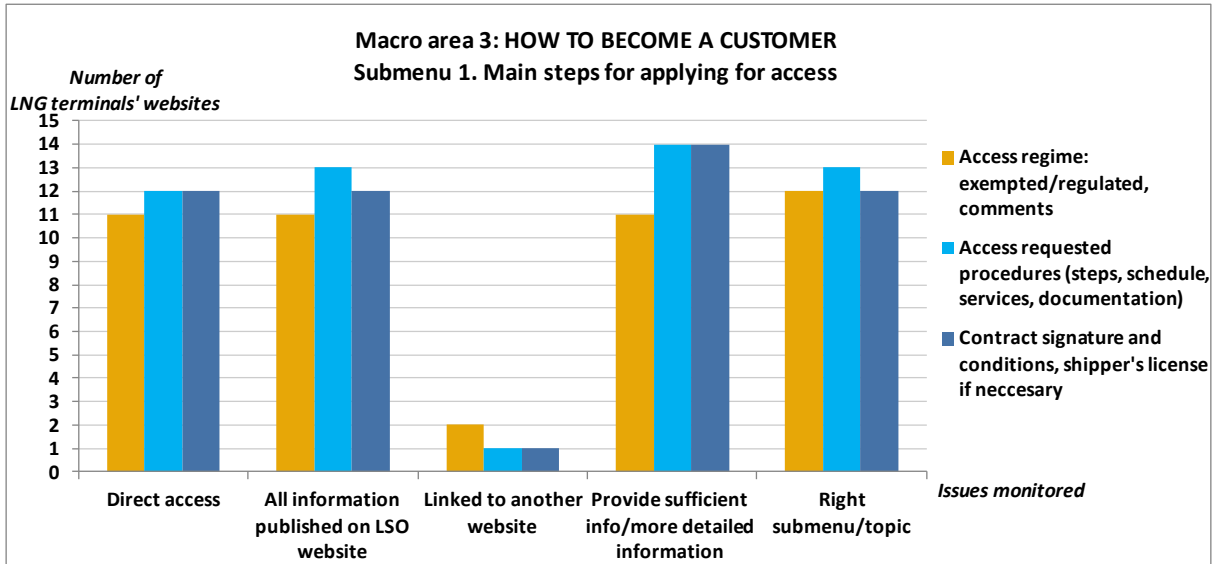
On the Sines LNG terminal’s website, this topic is shown in its Transparency Template but the content is under construction. On the Rovigo website, there are no separate topics for this submenu. On the Grain website, the template has not followed the same structure as the topics designed in the GLE TT. Information on how to become a customer/user is provided using a set of submenus which differs from the transparency template. On the Bilbao website, the information is linked to the National Regulator website, containing regulatory and specific contract models, however not all information is provided in English.

On Gate and South Hook LNG terminals’ webpages, no precise access regime is mentioned in the submenu. However, under this macro area “How to become a customer“, the Gate operator provides a clear hyperlink where the relevant information on the regulatory status of the terminal (as it has an exemption) is available. The relevant information is also available elsewhere on the South Hook LNG.



Figure 7 below shows the implementation of the submenu of “Main steps for applying for access” in the macro area “How to become a customer/user” in the 15 monitored LNG terminal’s websites, according to the issues and 3 topics monitored.

Figure 7: Implementation of the submenu “Main steps for applying for access” in the macro area “How to become a customer/user” of the GLE Transparency Template



4.3.2 Submenu 2 - Contract information

This submenu has 3 topics: (2) “Structure and content”, (2) “Link to contracts” and (3) “IT system, if available, for contracts management through the website”.

No information is available for the submenu on “Contract information” on the Isle of Grain and South Hook terminals’ websites. This submenu is under construction on the Sines website. On the Bilbao’s website, this submenu is part of the structure of the template, but there is no data.

Regarding the IT system available for contract management in European terminals, Zeebrugge and Fos Cavou terminals are the only ones that provide this information through the template.

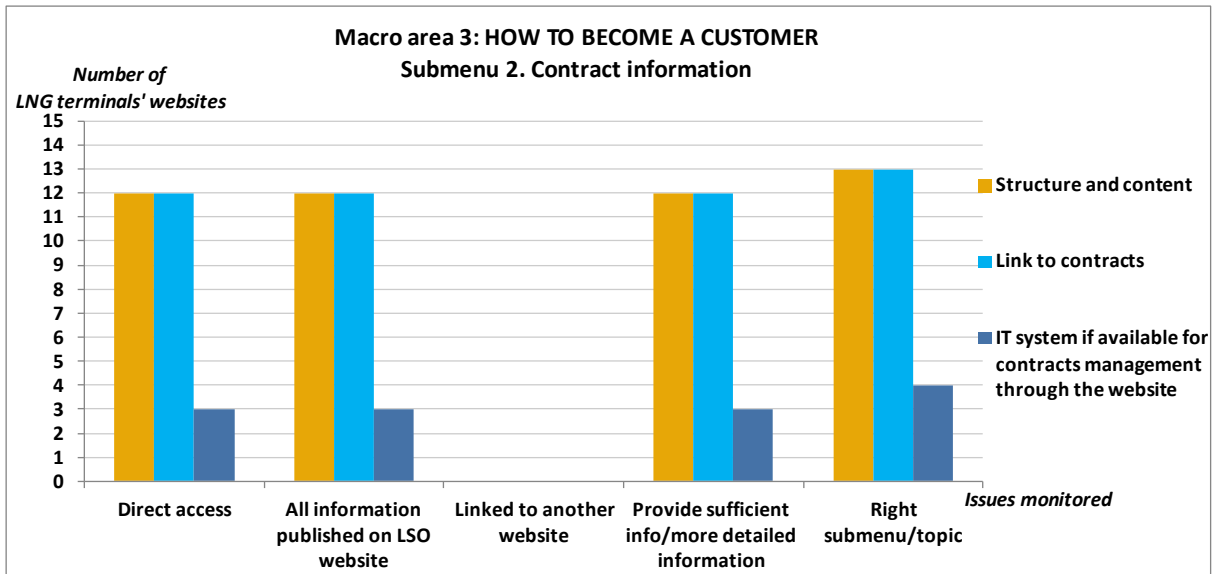
On the Gate website, the functionalities of the IT system (Electronic Bulletin Board, e.g. booking UIOLI slots etc.) are presented. The reason that no link is provided to the IT system is because this system is only accessible for registered users.

On the Spanish, Fos Tonkin and Montoir websites, there are no links to access IT contract management, but the information needed to contract can be easily found on their websites and access to contract management is directly communicated to customers by LSOs.

Figure 8 below shows the implementation of the submenu of “Contract information” in the macro area “How to become a customer/user” in the 15 monitored LNG terminal’s websites, according to the issues and 3 topics monitored.



Figure 8: Implementation of the submenu “Contract information” in the macro area “How to become a customer/user” of the GLE Transparency Template



4.3.3 Submenu 3 - Link to TSO website

10 out of the 15 websites have correctly implemented this submenu in their transparency templates.

On the Grain and South Hook websites, this submenu does not appear. On the Sines and Revythoussa terminal’s websites, the topic is mentioned but it is still in the process of being implemented.

4.3.4 Submenu 4 - Ship procedures

This submenu has 2 topics: (1) “Certification procedure” and (2) “List of vessels: information on approved/compatible/registered vessels as the case may be”.

On the Grain LNG website, the associated information on ship procedures is published in another submenu of the TT named "General Information and Procedures". On the South Hook website, this submenu does not exist; all information concerning ship procedures is published under the macro area “How to become a customer”.

On the Sines template, the whole submenu is under construction. On the Spanish terminals’ websites, topic 1, “Certification procedure/vetting, information to be exchanged”, has not been implemented.

On the Greek terminal’s website, this submenu is not divided into 2 topics. The information covered in both topics is published, but the information in topic 2, such as a list of vessels compatible with the terminal, is published at a different location on the website.

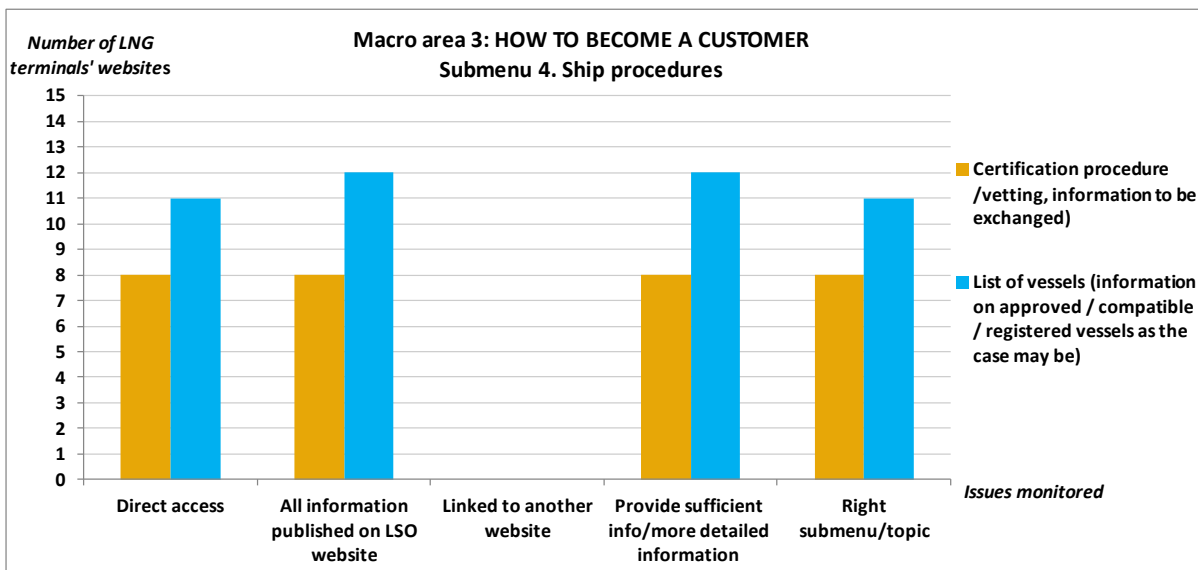
On the Gate template, the information in this submenu is not split up into 2 topics. Nevertheless the information on both topics is provided on its website, under the header “Ship procedures”.



On Panigaglia template, the submenu is structured in more topics which provide additional information.

Figure 9 below shows the implementation of the submenu of “Ship procedures” in the macro area “How to become a customer/user” in the 15 monitored websites, according to the issues and 2 topics monitored.

Figure 9: Implementation of the submenu “Ship procedures” in the macro area “How to become a customer/user” of the GLE Transparency Template



4.4 Macro area - Capacities

The macro area on “Capacities” has 2 submenus: (1) “Primary market”, and (2) “Secondary market”. The sections below outline the key findings on the implementation of this macro area.

On the Sines website, both of these submenus are under construction.

4.4.1 Submenu 1- Primary market

The submenu has 2 topics: (1) “Allocation rules” and (2) “Available capacity, in particular data published in accordance to transparency requirements of Regulation (EC) No. 715/2009”.

On the Fos Cavou and 3 of the Spanish terminals’ (Cartagena, Huelva and Barcelona) websites, the submenu “Primary market” has a different structure to the GLE Transparency Template. The information is made public through 2 topics: “Capacities” and “Capacity sale / Available capacity”.

The Spanish terminals have published the allocation rules - CAM and CMP - concerning primary market on their websites, but under the topics included in macro area 6, “Legal documentation”, not “Capacities”.



For the Greek terminal, the CAM and CMP rules are published on their website but they cannot be found directly through the template.

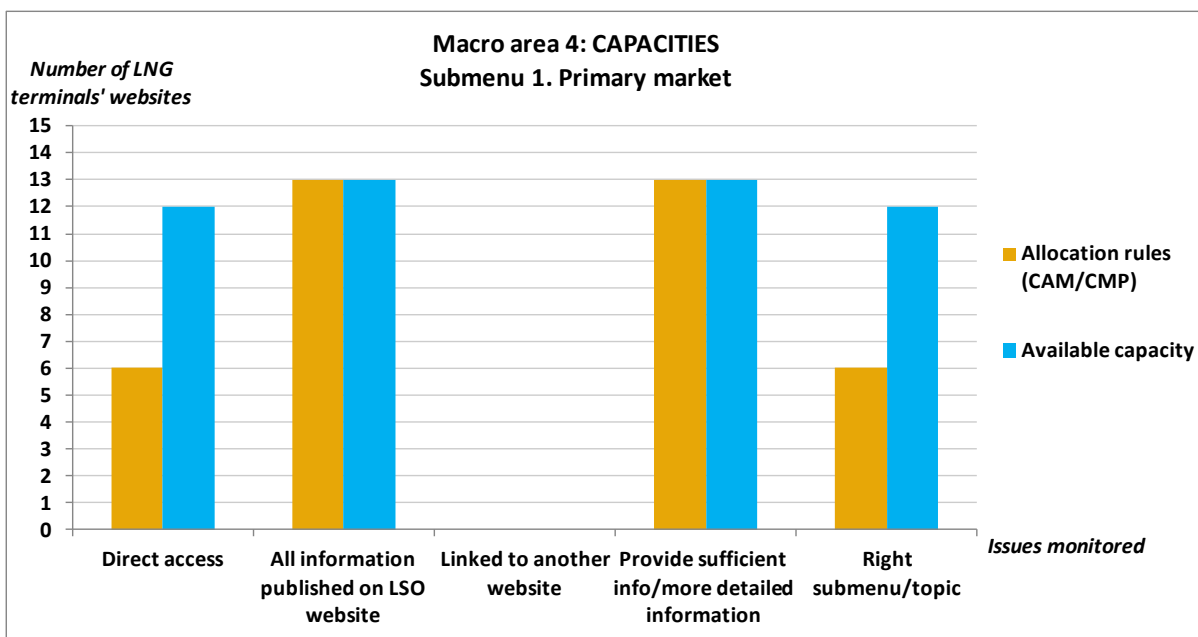
Regarding available capacity in European terminals, all operators, except for South Hook and Sines, have implemented data in the right topic:

- On the Sines website, the topic is in the process of being implemented.
- On the South Hook website, the information is published under the macro area "Operational data" of the TT.

On the Grain website, the submenu includes all the information, although not divided into the topics as set out in the TT. Regarding data associated with available capacity, it is mentioned that all capacity has been sold under long-term contracts at the terminal.

Figure 10 below shows the implementation of the submenu of "Primary market" in the macro area "Capacities" in the 15 monitored websites, according to the issues and 2 topics monitored.

Figure 10: Implementation of the submenu "Primary market" in the macro area "Capacities" of the GLE Transparency Template



4.4.2 Submenu 2 - Secondary market

This submenu has 4 topics: (1) "Allocation rules", (2) "Available capacity", (3) "List of players" and (4) "IT platform, if available, for secondary market management".

On the Bilbao website, this submenu is under construction. All 15 terminals, except Revyhoussa and Grain terminals, make allocation rules publically available directly under the topic "Allocation rules".



An IT Platform for secondary trading is not available in the French and Spanish terminals. However, LSOs provide information on the procedure for submitting bulletin boards. In addition, all the required documents are available to the market.

Gate terminal, provides information on its website about the platform itself (booking of UIOLI slots etc.) but users cannot access the platform from the website.

Zeebrugge operator indicates that the IT platform is available.

In Fos Tonkin, Montoir, Fos Cavou and South Hook's templates, the topic on available secondary capacity is not provided under this submenu but under the "Operational data" submenu. However, the latter information can be found in other sections of their websites.

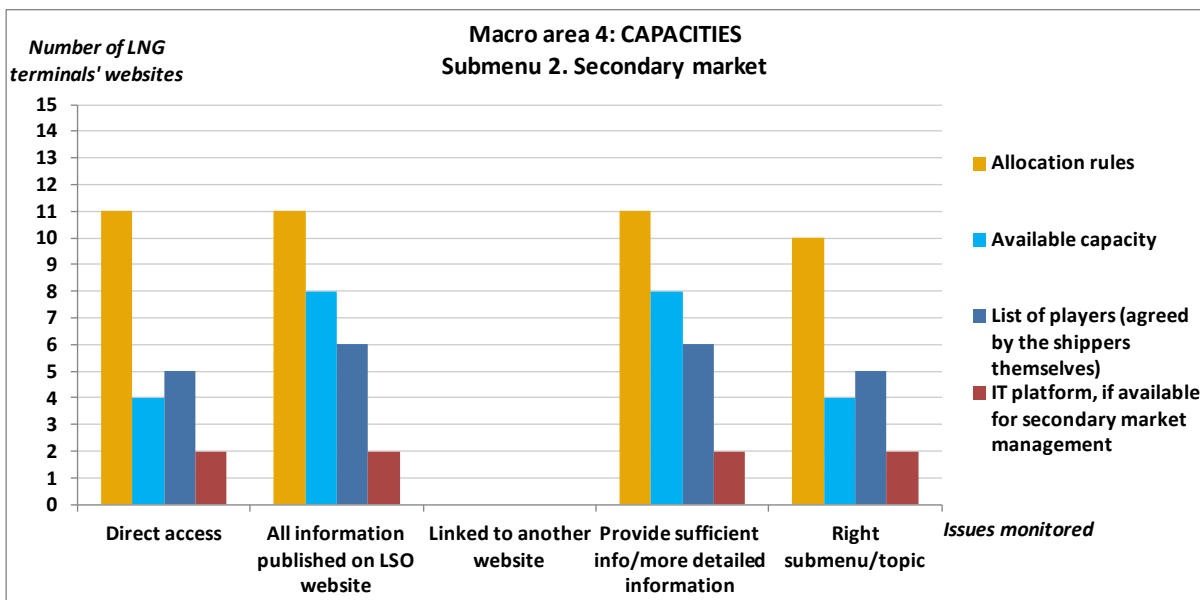
The information included in the topic list of players, does not appear on the Gate website.

On the Grain website, the list of players can be found by clicking directly on the topic in the Template.

On the Rovigo website, the list of exempted players is provided in the submenu "Exempted terminals" of the macro area 5, "Tariff".

Figure 11 below shows the implementation of the submenu of "Secondary market" in the macro area "Capacities" in the 15 monitored websites, according to the issues and 4 topics monitored.

Figure 11: Implementation of the submenu "Secondary market" in the macro area "Capacities" of the GLE Transparency Template





4.5 Macro area - Tariff

The macro area “Tariff” covers different items depending on whether the terminals are regulated or exempted. The sections below outline key findings on the implementation of this macro area.

4.5.1 Submenu 1 - Regulated terminals

The submenu has 2 topics: (1) “Applicable tariffs” and (2) “Tariff calculator”.

12 of the 15 terminals are regulated terminals, including Rovigo, which is partially exempted (80% of the regasification capacity is exempted for 25 years and 20% remains under regulated TPA regime). All of these terminals have implemented the template providing direct access to the applicable tariffs.

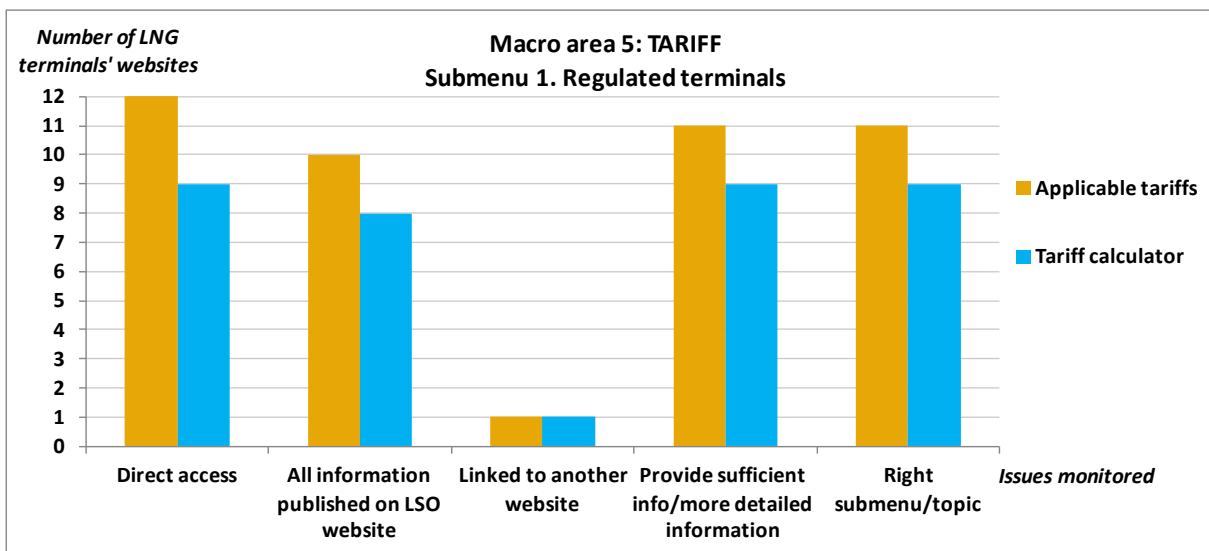
In the case of the Sines, the information under this topic is not included because the topic is in the process of being implemented.

A tariff calculator tool is not offered on the Sines, Zeebrugge and Rovigo websites. As an alternative, the Rovigo’s website provides users with calculation examples.

On the Bilbao website, both topics, “Applicable tariffs” and “Tariff calculator” are linked to the Technical System Management website.

Figure 12 below shows the implementation of the submenu of “Regulated terminals” in the macro area “Tariff” in the 12 websites where monitoring is applicable, according to the issues and 2 topics monitored.

Figure 12: Implementation of the submenu “Regulated terminals” in the macro area “Tariff” of the GLE Transparency Template





4.5.2 Submenu 2- Exempted terminals

Those terminals granted with exemptions have implemented the “Exempted terminals” submenu. This submenu has only one topic referring to information on methodology (auction process).

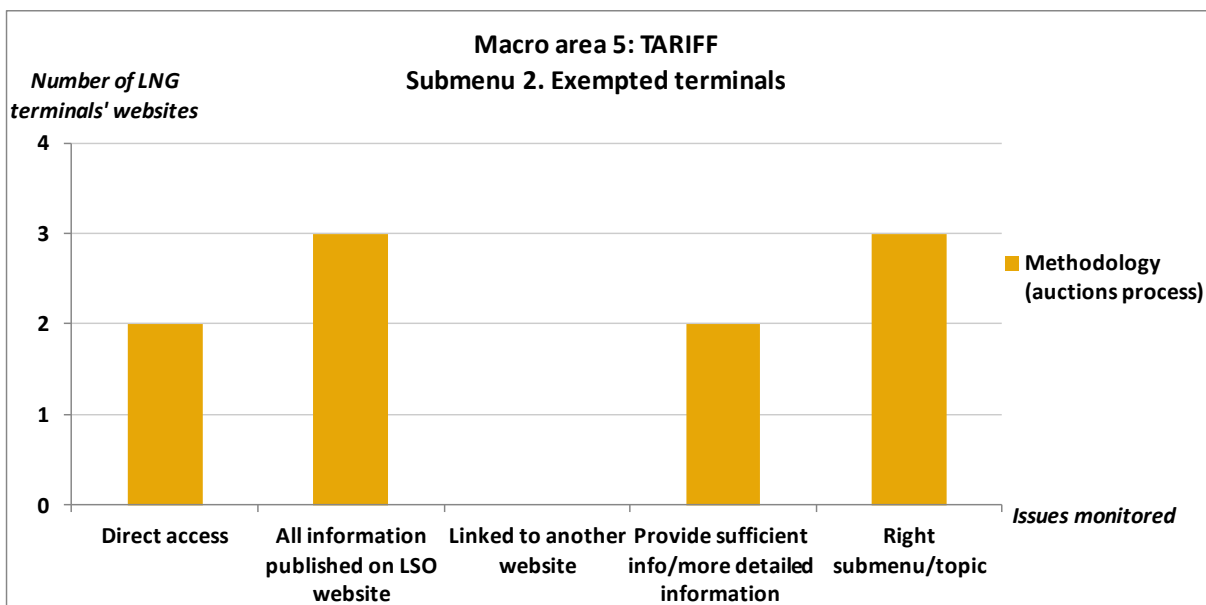
South Hook’s template does not provide direct access to this specific submenu, but the information can be found within the macro area “Tariff”.

The Grain website indicates that all capacity has been sold out at the Isle of Grain terminal. The Gate terminal operator indicates that tariffs are based on commercial negotiation and are exchanged during the contracting process. Regarding the information about capacities offered both in primary and secondary markets, it is published in the macro area “Capacities”.

Rovigo LSO does not provide information about methodology (auctions process) because it is not applicable to the terminal. However, it offers information on the exemption rules.

Figure 13 below shows the implementation of the submenu of “Exempted terminals” in the macro area “Tariff” in the 4 LNG terminal’s websites where monitoring is applicable, according to the issues and 1 topic monitored.

Figure 13: Implementation of the submenu “Exempted terminals” in the macro area “Tariff” of the GLE Transparency Template



4.6 Macro area - Legal documentation

In the TT, this macro area has 2 submenus: (1) “Contracts/Codes”; and (2) “Regulation/Legislation”. The section below outlines the key findings on the implementation of this macro area.



The information about legal documentation published by Sines and South Hook LSOs is not divided into submenus. Sines' submenu is under construction.

On the Spanish websites, the national regulation included in **contracts and codes** is linked to the Technical System Management website.

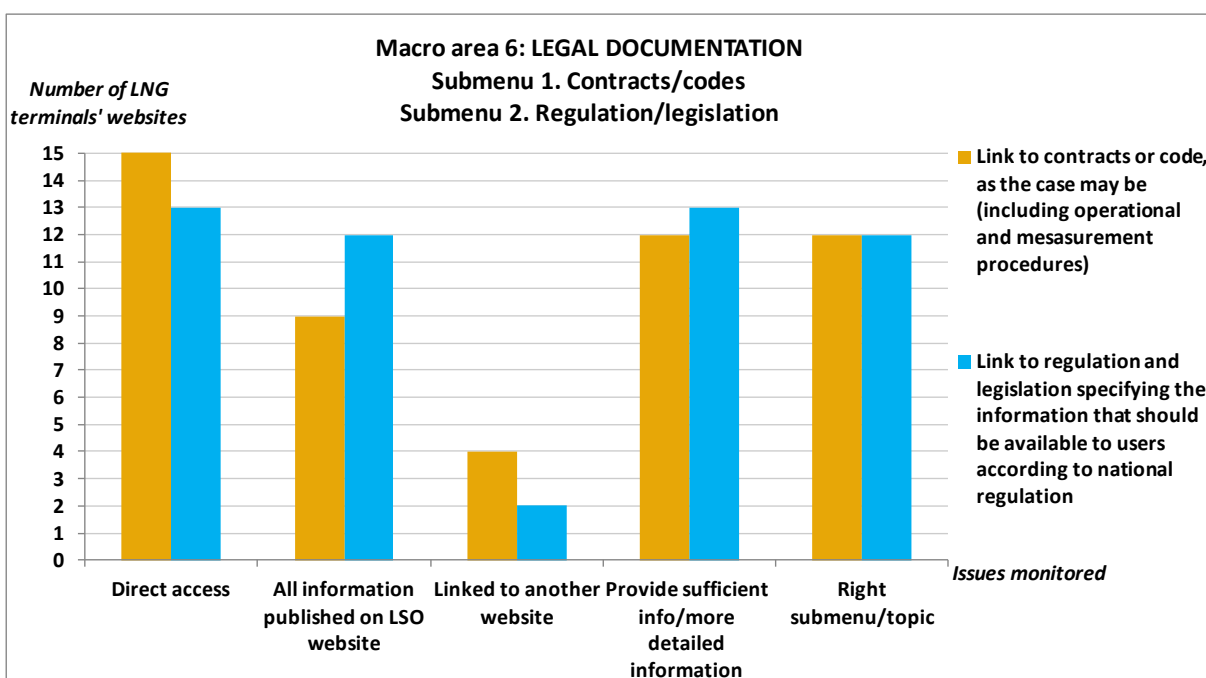
Grain operator does not publish information on contracts and codes.

The topic of **regulation/legislation** is linked by Grain and Bilbao to other websites, National Grid and Technical System Management respectively.

Greek and Spanish National regulation is published in their own language.

Figure 14 below shows the implementation of the submenus of "Contracts and codes" and "Regulation/legislation" in the macro area "Legal documentation" in the 15 monitored websites, according to the issues and 2 topics monitored.

Figure 14: Implementation of the submenus "Contracts and codes" and "Regulation/legislation" in the macro area "Legal documentation" of the GLE Transparency Template



4.7 Macro area - Operational data

The macro area in the TT has 2 submenus: (1) "Historical data" and (2) "Operational data".

Some terminals have implemented the TT without the submenu divisions historical data and operational data. Hence, storage, inflows, outflows and other data can be found together in the macro area.



The Spanish⁹ template has been organised using additional submenus. “Historical data” from the national system is publically available under an extra topic heading. Bilbao terminal has provided this information through a link to the Technical System Management website.

On the Sines, Fos Tokin and Montoir websites, the information items are directly presented under the macro area “Operational data”. No “Historical/Operational” submenus are available, because the IT tool gives access to both at the same time.

On the Fos Cavou website, the 2 submenus, “Historical data” and “Operational data”, are merged into a single submenu with all relevant information published there. Other submenus are added, namely "Works and maintenance", "Unplanned unavailability", "Available capacity" and "Secondary market".

Grain LSO provides links to another webpage (National Grid), where data on outflows (but not stocks and inflows) is available.

On the Gate website, the historical utilisation of the terminal is displayed using a graph. However, in the submenu “Operational data” they provide a link to a document which also shows the inflow, outflow and stock levels on a daily basis since the start of the terminal.

On the Revithousa webpage, some data is published, however, there are no submenus as set out in the TT.

Figure 15 below shows the implementation of the submenu of “Historical data” in the macro area “Operational data” in the 15 monitored websites, according to the issues and 3 topics monitored.

In addition, Figure 16 below shows the implementation of the submenu of “Operational data” in the macro area “Operational data” in the 15 monitored websites, according to the issues and 4 topics monitored.

⁹ Operational data in Spanish terminals: Stock levels, inflows, outflows, annual unloading schedule, minimum security stocks, physical status of the system, stream flows.



Figure 15: Implementation of the submenu “Historical data” in the macro area “Operational data” of the GLE Transparency Template

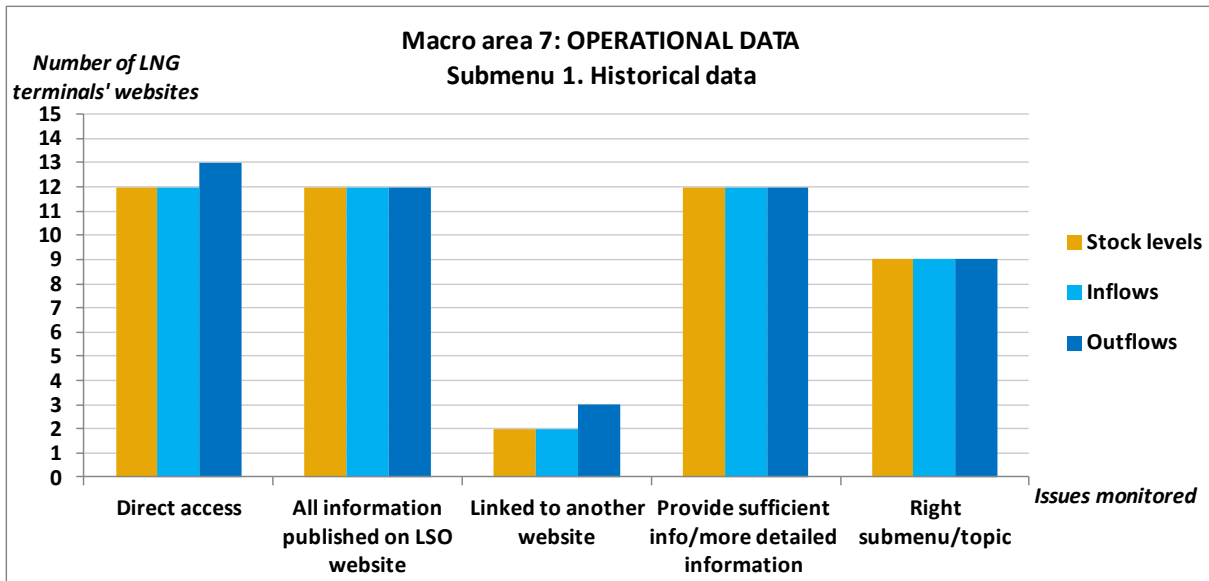
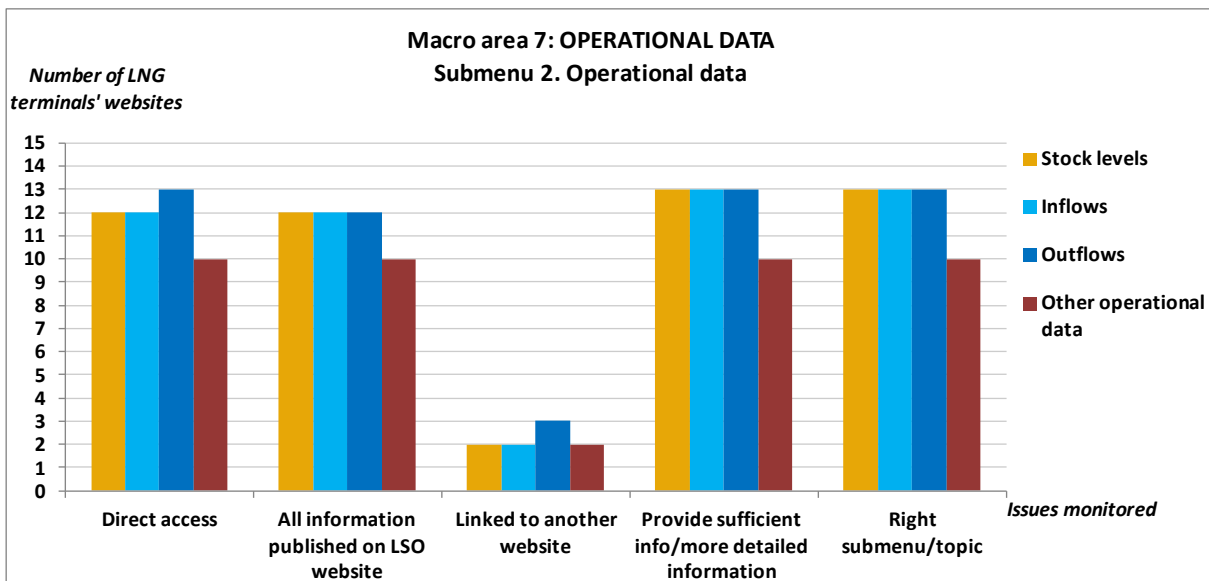


Figure 16: Implementation of the submenu “Operational data” in the macro area “Operational data” of the GLE Transparency Template



4.8 Macro area - Miscellaneous

“Miscellaneous” is the only macro area which has only one submenu “Projects” with only one topic “Project and latest infrastructure developments”. Since the 15 templates all have direct access to all macro areas, direct access to the topic “Miscellaneous” can be found on all 15 terminals’ websites.

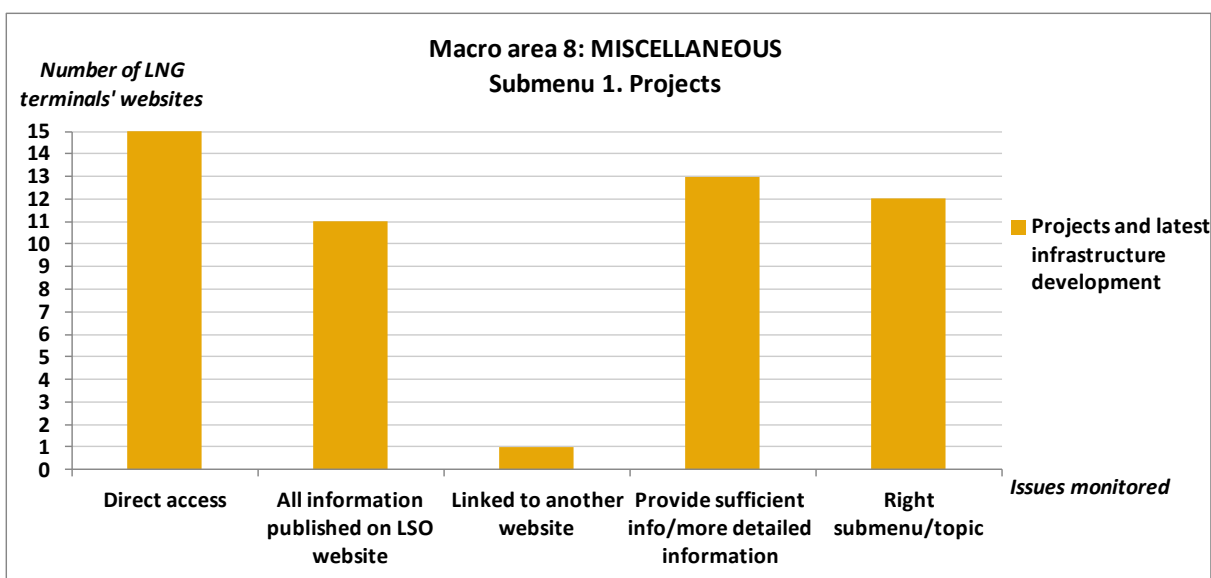
However, the type of information published under this topic varies:



- For the South Hook’s website, the information published in this topic is not directly associated with the “Miscellaneous” macro area.
- For Sines, the section is under construction without any data.
- For Revythoussa, there is no information about new projects, even though the LSO is developing new projects such as extension of tank capacities.
- For Bilbao, the information on past and future projects is linked to the Technical System Management, where the evolution of the Spanish infrastructures is shown.

Figure 17 below shows the implementation of the submenu of “Projects” in the macro area “Miscellaneous” in the 15 monitored websites, according to the issues and 1 topic monitored.

Figure 17: Implementation of the submenu “Projects” in the macro area “Miscellaneous” of the GLE Transparency Template



5. Other services offered by LNG terminals

LNG plays different roles in different European countries, although the contribution of LNG and associated facilities to security of supply through diversification of sources, routes and competition are common in every Member State.

Recent developments in the global LNG market, such as the decrease in gas demand in Europe, the growing demand for LNG in Asian and South American markets and the role of gas in the transition to a low-carbon generation mix have created the need for new services to be offered by LNG facilities.

The main new services offered are the following:

- **Breaking Bulk:** distribution from large/main import terminals to smaller regional or local regasification terminals. Smaller vessels or trucks can supply gas to small markets not connected to gas networks.
- **Back loading:** transfer of LNG via the terminal into smaller size vessels.
- **Transshipment:** transfer of LNG from one vessel to another.



- **Bunkering:** LNG used as a fuel for heavy transport (ships, trucks, rail). LNG is loaded on tank trucks or bunkering ships which transport LNG in smaller quantities.
- **Storage not associated to regasification:** use of LNG tanks in terminals as an unbundled practice.
- **Cooling:** makes use of LNG to cool down ships.

It is important for there to be transparency about these new services offered by LSOs, whether in the TPA regime or exempted, in order to facilitate their development and efficient utilisation. Table 3 shows which ancillary services are offered at operational European LNG terminals that have implemented the TT.

Table 3: Ancillary services offered in European LNG terminals in operation where TT is implemented

LNG Terminal	Public information on other services						
	Truck loading	Ship loading	Cooling	Bunkering	Parking	Breaking Bulk	Other*
Zeebrugge	X	X	X	-	-	-	
Fos Tonkin	X	X	X	-	-	-	X
Montoir	X	X	X	-	-	-	X
Fos Cavaou	-	X	X	-	-	-	X
Revythoussa	-	-	-*	-	-	-	-
Panigaglia	-	-	-	-	-	-	X
Rovigo	-	-	-	-	-	-	-
Sines	X	X	X	-	-	-	-
Barcelona	X	X	X	-	-	-	X
Cartagena	X	X	X	-	-	-	X
Huelva	X	X	X	-	-	-	X
Bilbao	X	X	X	-	-	-	X
Gate terminal	-*	-*	-*	-	-	-	-
Grain LNG	-*	-*	-*	-	-	-	-
South Hook	-	-	-	-	-	-	-

* Notes are explained in this section.

Zeebrugge: In addition to traditional LNG operations, the terminal has ship loading and truck loading (including truck cool down services, operator makes public that other services are offered, such as, LNG lending (arrangement for a quantity of LNG belonging to one terminal user to be lent to another terminal user) and Transfer of LNG in storage (a terminal user may transfer LNG he holds in storage to another terminal user) and publishes the regulatory documents related thereto.



The list of the ancillary services that the relevant LSO provides is published on the Fos Tonkin and Montoir websites. These lists cover: cargo off specs, cargo measurement, LNG ageing study/other LNG expertise, lay time extension, ship registration, SIRE inspection. Sometimes a short description of these services together with their prices is provided.

Regarding Fos Cavou, the information about other services offered is included in the macro area, "How to become a customer", where a list of information about specific services is published.

Revythoussa terminal offers ship cooling services; however, no information about these services is published on the website.

Panigaglia LSO provides information on some additional activities, as part of the LNG regasification service. They are not related to truck loading, ship loading, cooling but to other services.

In the case of Rovigo, the LSO does not offer other services such as truck loading, ship loading and cooling.

The Spanish websites offer the following ancillary services: cooling down, gassing up and truck loading. In addition, detailed prices and costs are public for both basic and ancillary services.

The Gate LSO is developing other services such as truck loading and ship loading, but these services are not yet offered to customers. In the macro area "Miscellaneous", the Gate LSO provides information to customers on these developments.

Information on other services is published in another section of the Isle of the Grain website. Other ancillary services are not available yet. Isle of Grain has launched an Open Season bidding process for interested parties for the development of a Road Tanker Loading Facility.



6. Conclusions

European LNG operators have made a significant effort to implement the TT on their websites. In general, it has been **accurately implemented** in a short time (around one year). 15 out of 18 terminals have published the TT.

In order to enable users to find easily relevant information, the template needs to be clearly accessible on the terminal's website. The transparency templates published are mostly located in sections of the respective LSO's website that are **easily accessible: 10 out of 15 templates** are featured on the home pages of the LSOs and all of them can be reached from GLE's home page.

In addition, the presentation and structure of the information is important to facilitate users' ability to navigate this information.

9 out of 15 templates implemented follow the same design (macro areas and submenus) as the original model created by GLE. These are Zeebrugge, Fos Tonkin, Montoir, Barcelona, Bilbao, Huelva, Cartagena, Panigaglia and Rovigo LNG terminals.

The template has the **same structure** (macro areas, submenus and topics mentioned in GLE's supporting document¹⁰) in 6 out of 15 templates: Panigaglia, Rovigo, Barcelona, Cartagena, Huelva and Bilbao LNG terminals.

On average, **70% of the information** included in the TT is published to a satisfactory standard by the 15 terminals.

- The information published is considered to be **not satisfactory or not sufficient** for these topics: vetting procedures, information from port authorities, gas quality conversions, IT allowing electronic booking, secondary markets functioning and platform and capacity allocation rules in exempted terminals.
- Not much of **historical information** is available. Sometimes operational and historical information is provided together.
- It should be **noted that the level of information published in English is quite good**; only the national legislation is rarely translated.
- Many terminals provide **further information, particularly regarding** additional services.

A minority of LSOs include **links** to other operators or authorities, in particular on tariffs, ship procedures and regulation.

Accurate and up to date information is of fundamental importance for users to be well informed. Despite this, most of the templates do not show the date when information was made public. However, this useful information is available on the websites of Panigaglia, Rovigo, Grain and Spanish terminals.

¹⁰ [GLE supporting document](#)



Users highlighted the importance of finding the information they need easily. Our research found that topics can be accessed directly in 69% of cases. In addition, the information is published under the right submenu in similar percentage (67%).

A small number of LSOs still report “work in progress” - like many sections on the Sines website and some parts of Bilbao terminal’s template.

These factors and others are further developed in the following sections.

6.1 On the format

The design of the templates implemented by operators has been analysed in comparison with the GLE Template model.

The presentation of information in a standardised manner by the different LNG terminals helps users/customers to find similar data in each terminal. Table 4 below illustrates the results of the monitoring exercise.

The transparency templates are, in general, located in sections of the websites that are **easily accessible** (11 out of 15 are on the home pages).

On the other hand, 4 LNG terminals: Zeebrugge, Sines, Bilbao and Grain do not publish any references to the TT in their home pages.

9 out of the 15 templates follow the **same design** as the original model created by GLE (macro areas and submenus). These are Belgium, Fos Tonkin, Montoir, Spain (four) and Italy (two) templates.

The template follows of the 3 different divisions (macro areas, submenus and topics) in 6 out of the 15 templates: Panigaglia, Rovigo, Barcelona, Cartagena, Huelva and Bilbao.

Sines LNG operator has implemented the TT with a **similar structure** to GLE TT, i.e., macro areas and submenus, but no topics have been included. However, some areas are under construction.

South Hook has organised the template in macro areas only. A single document contains all the relevant information for each of the seven macro areas. In addition, the two last macro areas: “Operational data” and “Miscellaneous” provide the information with direct links.

The TT implemented on the Grain website has a number of extra submenus which are not included in the GLE TT.

Table 4: Structure of the Transparency Templates implemented in LNG terminals websites

TT structure	Same format as GLE TT	Other format
Macro Area +	<u>Panigaglia</u>	
	<u>Rovigo</u>	



TT structure	Same format as GLE TT	Other format
Submenu + Topic	<u>Barcelona</u>	
	<u>Cartagena</u>	
	<u>Huelva</u>	
	Bilbao	
Macro Area + Submenu	Zeebrugge	<u>Fos Cavaou</u> *
	<u>Fos Tonkin</u> *	<u>Revythoussa</u>
	<u>Montoir</u> *	Sines *
		<u>Gate</u> *
		<u>Grain</u>
Macro Area		<u>South Hook</u>

* Sines: No submenu in legal documentation or in operational data.

* Gate: No direct access to submenus but they can be found within the content.

* Fos Cavaou: Some submenus are not presented under the same macro area as in the GLE TT.

* Fos Tonkin and Montoir: it is necessary to click on the macro area to see the submenus that lay behind.

Note: Terminals that are underlined have direct access to the Transparency Template from their home pages.

6.2 On the content

Accurate and up to date information is necessary for users/customers to be well informed.

Only 7 out of the 15 templates implemented show the **date when information was made public**. This important information is shown on the websites of Panigaglia, Rovigo, Grain and Spanish terminals.

Another finding is that minor topics are **linked to another website** where this information is published:

- Facility main characteristics: Technical System Management and Port authorities
- LNG quality: Technical System Management
- Main steps for applying: NRA
- Tariffs (regulated terminals): Technical System Management
- Legal documentation: NRA, Technical System Management
- Historical and operational data: TSO
- Projects: TSO



Some operators, such as those operating the Belgium, French, Spanish and Italian terminals, publish **additional information**, outside the scope of the TT, in some of the submenus. On the contrary, in the TT implemented by Grain there is, in general, **less information** than in the GLE TT.

This monitoring report concludes that in more than 72% of cases **sufficient information** is provided on a topic. On average, 70% of the information included in the TT is considered as published satisfactory by the 15 terminals.

The most frequent topics where there is a **lack of information** are:

- Information related to the port and the vetting procedures
- Information related to gas quality conversions
- There is a small number of IT systems allowing electronic booking of capacity
- Secondary markets – this is because there are not many platforms available
- Capacity allocation rules in exempted terminals

Little **historical information** is available. Sometimes operational and historical information are provided together.

The report identifies important gaps in information provision for some terminals. For example, although Sines LNG operator has implemented the template, a number of areas are under construction, so there is no content to be analysed. For South Hook, although most of the required information is available on its website, much of it is not available and/or not easily accessible on its transparency template, due to its different organisation compared to the GLE TT.



Table 5: Evaluation of the content of information provided in each topic of the Transparency Template (15 TT have been analysed)

Submenu	Topic	Number of LSOs that provide sufficient information on their websites
Contact	General contact	14
	Commercial contact	14
Facilities main characteristic	Location	11
	Nominal annual capacity (bcm/y-d)	12
	LNG Storage capacity	15
	Number of LNG tanks	14
	Max LNG ship class size	13
	Number of jetties	12
	Min sea depth along side	7
Service description	Info from port authorities	8
	Basic services (bundled / unbundled)	14
LNG quality	Other services (truck loading, ship loading, cooling)	10
	LNG quality specification	13
Main steps for access	Gas quality conversion equipments	8
	Access regime: exempted/regulated, comments	11
	Access requested procedures (steps, schedule, services, documentation)	13
Contract information	Contract signature and conditions, shipper's license if necessary	13
	Structure and content	11
	Link to contracts	11
TSO info	IT system if available for contracts management through the website	3
	Link to TSO website	11
Ship procedures	Certification procedure/vetting, information to be exchanged)	8
	List of vessels (information on approved/compatible/registered vessels as the case ma	11
Primary market	Allocation rules (CAM/CMP)	13
	Available capacity	13
Secondary market	Allocation rules	11
	Available capacity	8
	List of players (agreed by the shippers themselves)	6
	IT platform, if available, for secondary market management	2
Regulated terminals	Applicable tariffs	11/12
	Tariff calculator	9/12
Exempted terminals	Methodology (auctions process)	2/4
Contracts and codes	Link to contracts or code (including operational and mesasurement procedures)	12
Regulation/legislation	Link to regulation and legislation specifying the information that should be available to users according to national regulation	13
Historical data	Stock levels	12
	Inflows	12
	Outflows	12
Operational data	Stock levels	13
	Inflows	13
	Outflows	13
	Other operational data	10

6.3 On being “fit for purpose”

The GLE Transparency Template has been designed with the aim of facilitating the acquisition of information necessary to gain access to European LNG terminals.

One of the main challenges is using a harmonised and friendly tool that respects the diversity of business models and regulatory regimes; a tool that works for all European LSOs.



Finding the information easily is an important request from the users/customers. The report concludes that the relevant topic is **directly found** when selecting the hyperlink on the LSO website in 69% of cases. Additionally, regulators consider that the information is published in the **right submenu** in a similar percentage of cases (67%).

Regarding the **language of publication**, most information can be found in English. Only the national regulation in several countries such as Spain, Greek and Italy is found in their own language.

7. Recommendations

This Monitoring Report reveals that, in general, most terminals have properly implemented the template, although there is room for improvement in a number of cases. This report focuses on the information required under the defined TT, but recognises that the information gaps (in relation to specific terminals) noted in this report may be reported on the LSO website but through alternative formats other than the TT. Regulators should work with LSOs to encourage the adoption of the TT and/ or seeking further clarifications/ additions on the information they publish on their websites.

This report's main recommendations to LSOs are:

- Ensure that the transparency template is clearly visible from their website homepages for better accessibility.
- Publish any outstanding information currently missing from the templates.
- Align the TT structure with the model of GLE TT for consistency.
- Organise information in graphs and tables, where appropriate, to make it easier for users to process.
- Clearly state when information in the template was last updated.
- Allow easy access to information on a particular topic while at the same time, letting users download the information in a friendly manner.

As a result of this assessment, CEER encourages LSOs to keep working to ensure full compliance with the transparency requirements and to hold regular discussions on ways to enhance the template. LSOs should also take into account not only obligations under new European rules, NC and Regulations (such as CMPs), CAM NC, Regulation (EU) No 1227/2011 on REMIT but also LNG market developments and new services offered in their LNG terminals.



Annex 1 – CEER

The Council of European Energy Regulators (CEER) is the voice of Europe's national regulators of electricity and gas at EU and international level. Through CEER, a not-for-profit association, the national regulators cooperate and exchange best practice. A key objective of CEER is to facilitate the creation of a single, competitive, efficient and sustainable EU internal energy market that works in the public interest.

CEER works closely (and supports) the [Agency for the Cooperation of Energy Regulators \(ACER\)](#). ACER, which has its seat in Ljubljana, is an EU Agency with its own staff and resources. CEER, based in Brussels, deals with many complementary (and not overlapping) issues to ACER's work such as international issues, smart grids, sustainability and customer issues.

The work of CEER is structured according to a number of working groups and task forces, composed of staff members of the national energy regulatory authorities, and supported by the CEER Secretariat.

This report was prepared by the LNG Task Force of CEER's Gas Working Group.

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Annex 2 – List of abbreviations

Term	Definition
ACER	Agency for the Cooperation of Energy Regulators
CAM	Capacity Allocation Mechanism
CEER	Council of European Energy Regulators
CMPs	Congestion Management Procedures
GGPLNG	Guidelines for Good Third Party Access Practice for LNG System Operators
GLE	Gas LNG Europe
GWG	Gas Working Group
LNG	Liquefied Natural Gas
LSO	LNG System Operator
NRA	National Regulatory Authority
REMIT	Regulation (EU) No 1227/2011 on Wholesale Energy Market Integrity and Transparency
TPA	Third Party Access
TSO	Transmission System Operator
TT	Transparency Template
UIOLI	Use It Or Lose It