



Transparency of Gas Transmission System Operators in the Energy Community

Compliance with the Energy Community Law Requirements

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INTRODUCTION

1. About ECRB

The Energy Community Regulatory Board (ECRB) operates based on the Energy Community Treaty. As an institution of the Energy Community¹ the ECRB advises the Energy Community Ministerial Council and Permanent High Level Group on details of statutory, technical and regulatory rules and makes recommendations in the case of cross-border disputes between regulators. ECRB is the independent regional voice of energy regulators in the Energy Community. ECRB's mission builds on three pillars: providing coordinated regulatory positions to energy policy debates, harmonizing regulatory rules across borders and sharing regulatory knowledge and experience.

2. Background

Transparency was an element of every legislative package adopted on EU level since the beginning of market liberalisation and is understood to be a necessary precondition for market functioning. With the experience gained during the establishment and development of cross-border wholesale natural gas markets in the EU, awareness for the need of a harmonised and comprehensive set of rules for transparency arose. Transparency provisions of Regulation (EU) 715/2009² provide a comprehensive set of definitions of the data to be published.

This is the second transparency review prepared by the ECRB Gas Working Group³ for the purpose of identifying the level of compliance of the transmission system operators with the transparency requirements of both Directive (EU) 73/2009⁴ and Regulation (EU) 715/2009.

¹ www.energy-community.org. The Energy Community comprises the EU and Albania, Bosnia and Herzegovina, FYR Macedonia, Georgia, Kosovo*, Moldova, Montenegro, Serbia and Ukraine. Armenia, Turkey and Norway are Observer Countries. [*Throughout this document the symbol * refers to the following statement: This designation is without prejudice to positions on status, and is in line with UNSCR 1244/1999 and the ICJ Advisory Opinion on the Kosovo declaration of independence.].

² https://www.energy-community.org/dam/jcr:31f64003-5c68-4f2a-9c18-61927a6a61ec/Regulation_715_2009_GAS.pdf. Adapted and adopted for the Contracting Parties by Decision 2011/02/MC-EnC of the Ministerial Council.

³ The previous one was published in April 2016: https://www.energy-community.org/dam/jcr:d5246dca-babe-4a35-8de9-52b7c28f51d9/ECRB_transparency_transmission.pdf

⁴ https://www.energy-community.org/dam/jcr:004b3ca7-fa52-4633-875e-8ac1b2cea021/Directive_2009_73_GAS.pdf. Adapted and adopted for the Contracting Parties by Decision 2011/02/MC-EnC of the Ministerial Council.

3. Scope and methodology

The present report covers the Contracting Parties where a gas market is operational, namely Bosnia and Herzegovina (Republika Srpska entity), FYR of Macedonia, Moldova, Serbia, Ukraine and Georgia. This monitoring activity shall assist the National Regulatory Authorities (NRAs) in enforcing implementation of the Regulation (EU) 715/2009.

Data presented in this report refers to status quo in July 2017. Data and analysis are based on information provided by the NRAs of the analysed markets relating to the transparency requirements of Directive 2009/73/EC and Regulation (EC) 715/2009. Each publication item, as listed in the tables and Annex I of this report, is treated with equal weight for the results presented.

The results presented in the following chapters are sorted along the following lines:

- Implementation of transparency requirements of Directive (EU) 73/2009
- Implementation of transparency requirements of Regulation (EU) 715/2009
- Overall scoring in terms of publication of data pursuant to Regulation (EU) 715/2013;

In addition, the Annex provides a detailed analysis of the level of compliance with the individual publication requirements of Regulation (EU) 715/2009 per Contracting Party.

FINDINGS

1. General overview

Progress has been achieved in transposition of the transparency requirements of Third Energy Package (TEP) in all Contracting Parties, except for Bosnia and Herzegovina and fYR of Macedonia where legislative reforms for transposition of the TEP have not been concluded yet.⁵ However implementation, i.e. the actual publication of the complete set of information as required, is still lagging behind.

The present report focuses on analysing the factual level of compliance with the transparency requirements of Directive (EU) 73/2009 and Regulation (EU) 715/2009. Before doing so, it is worth presenting an overview of the status of legal compliance of national legislation with the TEP in the first place- this information is relevant as lack of a legal basis requiring data publication must be accepted as one of the reason of poor factual compliance.

- Albania: currently has no gas sector. Nevertheless, in September 2015 Albania transposed the TEP and established a general legal framework for further developing the gas market in compliance with the *acquis communautaire* (hereinafter 'acquis'). Following the requirements stipulated in the new law legal reforms enabling a fully functioning gas market are to be introduced.
- Bosnia and Herzegovina: there is no state level legislation compliant with the TEP. Gas legislation exists on entity level in the Federation of Bosnia and Herzegovina and Republika Srpska⁶ that, however, do not transpose the major principle of the gas *acquis*.
- fYR of Macedonia: national legislation has not yet been reformed to transpose the requirements of the TEP and, thus, is only to a limited extent compliant with the provisions of Directive (EU) 73/2009 and Regulation (EU) 715/2009.
- Georgia: became the Contracting Party of the Energy Community in July 2017, thus hasn't transposed the Third Energy Package in national legislation⁷ yet.
- Kosovo*: following the adoption of the Law on Natural Gas Sector, Kosovo* is to a large extent compliant with the TEP in the gas sector, but has no functional gas sector.
- Moldova: with the adoption of the Law on Natural Gas in 2016, Moldova transposed the TEP requirements. However numerous secondary legislative acts have to be adopted in the upcoming period to ensure Moldova that implements the gas *acquis* in real terms;

⁵ For the case if Bosnia and Herzegovina legislation for the gas sector does not exist on State level, including lack of competences of the State level regulatory authority.

⁶ Law on Gas adopted in 2007 and amended in 2012.

⁷ Transposition deadline for 73/2009 Directive and 715/2009 Regulation is 1st of January 2020 with the limited enactment on cross-border trade.

- Montenegro: has no gas market. Still, in 2016 Montenegro transposed Directive (EU) 73/2009 and Regulation (EU) 715/2009 into national legislation.
- Serbia: the Energy Law of 2014 transposes the provisions of the TEP.
- Ukraine: the Law on Natural Gas Market is in line with Directive 2009/73/ EC and Regulation (EC) 715/2009.

Tables 1 and 2 hereinafter below provide information on de facto compliance of the gas market stakeholders of the Energy Community Contracting Parties with the transparency requirements of Directive 2009/73 EC and Regulation 715/2009. Links to the relevant publications as well as details on compliance with the detailed provisions of Annex I of the Regulation 715/2009 are available in the Annex of the present survey.

Table 1 Implementation of transparency requirements of Directive 2009/73/EC⁸

Relevant Art. of Directive 2009/73/EC	Short description of information that has to be published	Body responsible for publishing	Bosnia and Herzegovina	fYR of Macedonia	Moldova	Serbia	Ukraine	Georgia
13(3) Tasks of transmission, storage and/or LNG system operators	Terms and conditions, including rules and tariffs, for the provision of balancing services by the TSOs	TSO; NRA methodology for charges	√	√	nap	√	√	nap
23(1) Decision- making powers regarding connection of storage facilities, LNG regasification facilities and industrial customers to the transmission system	Procedures and tariffs for connection of storage facilities, LNG regasification facilities and industrial customers to the transmission system	TSO	√	X	√	√	√	nap
32(1) Third- party access	Transmission, distribution and LNG tariffs or methodologies, where only methodologies are approved	TSOs, DSOs, LNG operators, NRAs	√	√	√	√	√	√

⁸ Throughout this document the following abbreviations apply: NRAs – national regulatory authorities; TSO – transmission system operator; SSO – storage system operator; DSO – distribution system operator, nap - not applicable.

Table 2 Implementation of transparency requirements of Regulation 715/2009

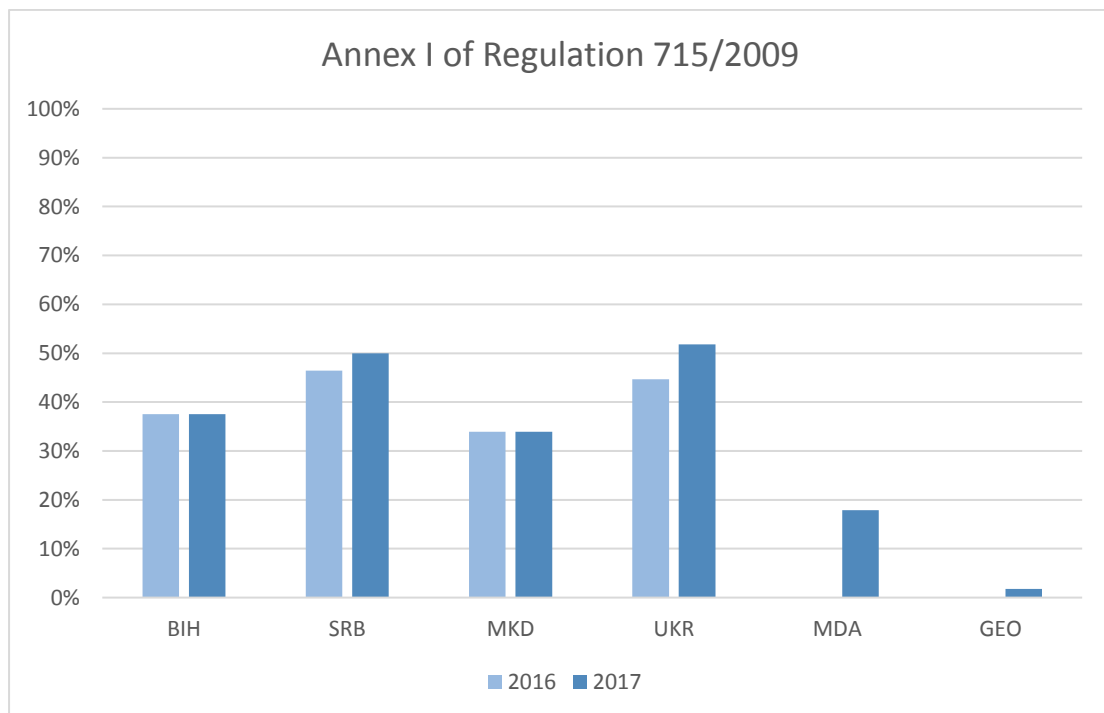
Relevant Art. Of Regulation 715/2009	Short description of information that has to be published	Body responsible for publishing	Bosnia and Herzegovina	FYR of Macedonia	Moldova	Serbia	Ukraine
Art.3 Certification of TSOs	Decision on TSO certification, and, in case the decision different from the opinion of the ECS, the reasoning underlying such decision	NRA	X	X	X	X	X
Art.15 Third- party access services concerning storage and LNG facilities	Data on the use and availability of services, in a time-frame compatible with the LNG and storage facility users' reasonable commercial needs	LNG and SSO operator	nap	nap	nap	X	√
Article 16 (2) Principles of CAM and CMP concerning TSOs	Capacity allocation mechanisms	TSO	√	√	X	√	√
Article 16 (3) Principles of CAM and CMP concerning TSOs	Congestion management procedures	TSO	√	√	X	√	√
Article 17 (2) Principles of CAM and CMP concerning storage and LNG facilities	Capacity allocation mechanisms	LNG and SSO operator	nap	nap	nap	X	√
Article 18(1) Transparency requirements concerning TSOs	Detailed info. regarding services offered and the relevant conditions applied, technical information necessary for network users to gain effective network access	TSO	√	√	X	√	√
Article 18(2) Transparency requirements concerning TSOs	Reasonably and sufficiently detailed information on tariff derivation, methodology and structure	TSO or NRA	√	√	X	√	√
Article 18(3) Transparency requirements concerning TSOs	Info. on technical, contracted and available capacities on a numerical basis for all relevant points including e/e points on a regular and rolling basis, in a user- friendly and standardized manner	TSO	√	X	X	√	√ (but only for interconnecti on points)

Relevant Art. Of Regulation 715/2009	Short description of information that has to be published	Body responsible for publishing	Bosnia and Herzegovina	FYR of Macedonia	Moldova	Serbia	Ukraine
Article 18(6) Transparency requirements concerning TSOs	Ex- ante and ex- post supply and demand information, based on nominations, forecasts and realized flows in and out of the system	TSO	X	X	X	X	X
Article 18(7) Transparency requirements concerning TSOs	Measures taken as well as costs incurred and revenue generated to balance the system	TSO	X	X	X	X	√
Article 19 (1) Transparency requirements concerning storage and LNG facilities	Info. regarding services offered and the relevant conditions applied, technical information necessary for new LNG and storage facility users to gain effective network access	SSO and LNG operator	nap	nap	nap	X	√
Article 19 (2) Transparency requirements concerning storage and LNG facilities	Info. on contracted and available storage and LNG facility capacities on a numerical basis, on a regular and rolling basis and in a user-friendly standardized manner	SSO and LNG operator	nap	nap	nap	X	√
Article 19 (4) Transparency requirements concerning storage and LNG facilities	The amount of gas in each storage and LNG facility, inflows and outflows, and the available storage and LNG facility capacities, including for those facilities exempted from TPA.	SSO and LNG operator	nap	nap	nap	X	√
Article 19 (5) Transparency requirements concerning storage and LNG facilities	Sufficiently detailed information on tariff derivation, the methodologies and the structure of tariffs for infrastructure under regulated TPA	SSO and LNG operator or NRA	nap	nap	nap	√	√
Article 21(2) Balancing rules and imbalance charges	Calculation methodology for imbalance charges as well as final tariffs	TSO or other competent authority	X	√ (calculation methodology)	X	√ (calculation methodology)	√ (calculation methodology)

Regarding the implementation of the transparency requirements of Regulation 715/2009, data publication checks were conducted as regards the relevant Articles of Regulation 715/2009 and Annex I of Regulation 715/2009. The overall scoring for compliance with Annex I of Regulation 715/2009 provided in Annex I of the present report is calculated as ratio of published data items compared to all data items.

Figure 1 shows progress made by the Contracting Parties regarding the implementation of data publication requirements of Annex I of 715/2009 Regulation in 2017 compared to the 2016 year. Georgia and Moldova participated for the first time in the survey, therefore compliance data is presented only for 2017. Serbia and Ukraine are well ahead in terms of compliance with the Annex I of Regulation 715/2009. Important improvement has been achieved by TSOs in both countries by publishing information on technical, contracted and available capacities for all relevant points including entry and exit points on a regular basis. It is also worth mentioning Moldova's attempts to increase data transparency implementation. Taking into account ongoing efforts, further improvements are expected in the next reporting period. Georgia fails to satisfy data transparency requirements to a great extent, which is due to various factors such as not-yet compliance of Georgian gas legislation with the gas acquis, lack of secondary legislation⁹ and weak regulatory powers for regulating and monitoring the natural gas sector. For an in-depth understanding of the overall scoring please refer to the Annex of this report.

Figure 1 Overall scoring in terms of publication of data pursuant to Annex I of Regulation 715/2009.



⁹ Poor market rules, no network codes etc.

2. Summary of findings

In general, primary and secondary legislation setting the rules for gas market functioning in Serbia and Ukraine provide a solid background for fulfilling transparency requirements of both Directive 73/2009 and Regulation 715/2009. Nevertheless, the unbundling of transmission system operator in both countries has not been finalized and many activities envisaged by the national network codes are not yet performed. Having in mind that the majority of secondary legislation in Ukraine started being implemented in 2015, certain progress is already visible, albeit the full implementation of transparency requirements is still pending. Secondary legislation implementing the TEP in is still under preparation in Moldova. Primary legislation is currently under preparation in FYR of Macedonia, while Bosnia and Herzegovina completely lacks as legislation and regulation on State level and legislation in place on entity level is not sufficiently in line with the TEP. Georgia lags behind in transposition of not only transparency requirements but also all other provisions of the TEP. However, having in mind that Georgia became Contracting Party only this year, it is expected that compliance will be improved in the coming years.

3. Findings by Contracting Party

Bosnia and Herzegovina

The transparency findings refer to the entity Republika Srpska and the relevant transmission system operator *Gas Promet*.

Required information is currently published in accordance with the methodology for calculation of transmission charges and transmission network code and covers:

- procedures for connection,
- tariff methodology and applicable tariffs,
- capacity allocation mechanism and congestion management procedures,
- information on services offered by the transmission system operator as well as technical information necessary for access to the network,
- some technical information necessary for network users to gain effective access to the system, for all relevant points (technical and available capacity), however not the relevant historical information.

The information that is still not published by the transmission system operator:

- nominations and re-nominations, actual physical flows,
- planned interruptions of firm and interruptible capacity,
- Measured values of the gross calorific value or the Wobbe index
- Information regarding the transmission system (ref. Article 3(4) of Annex I of Regulation 715/2009).

FYR of Macedonia

Required information is currently published in accordance with the methodology for calculation of transmission charges, gas market rules and the transmission network code and relates to:

- The tariff methodology and applicable tariffs,
- The services offered by the transmission system operator,
- The capacity allocation mechanism and congestion management procedures and
- The connection procedures.

However the transmission system operator currently does not publish information on technical and available capacities, actual physical flows, information related to balancing services provided as well as other data on system usage, as required by Regulation 715/2009.

Moldova

In 2016 ANRE adopted a regulation on access to the natural gas networks and congestion management that transposes the provisions of Regulation 715/2009, mainly the transparency requirements. At the same time, the list of the relevant points of the transmission network was approved by the NRAs, TSO having the obligation to publish on their web page all the necessary information to ensure efficient access to natural gas transmission networks.

Based on the regulation on supply and use of natural gas, technical norms for transport networks of natural gas, procedures and tariffs for connection are published. Also the applicable transmission and distribution tariff methodologies and the resulting tariffs are published.

Serbia

The majority of the requirements of Directive 73/2009 and Regulation 715/2009 related to transparency of the transmission system operators are fulfilled by via the transmission network codes. However there is still missing information on ex-ante and ex-post supply and demand situation, balancing measures and revenues. The network codes require such publications, however TSO's unbundling process has not been finalized i.e. activities for which transparency is required are not yet performed.

The regulatory authority publishes all information on transmission tariffs and methodology for their calculation.

Transparency requirements of Annex I of Regulation 715/2009 are only partly fulfilled i.e. actual publications should be provided after the unbundling is finalized and the transmission network code fully implemented.

Ukraine

The majority of the requirements of Directive 73/2009 and Regulation 715/2009 related to transparency of the transmission system operators have been fulfilled. The information that is still missing is related to balancing measures and revenues and ex-ante and ex-post supply and demand situation.

Transparency requirements of Annex I of Regulation 715/2009 are partly fulfilled and the published information is related to:

- most of the technical information necessary for network users to gain effective access to the system, for all relevant points (technical capacity for flows in both directions, contracted firm capacity, available capacity, actual physical flows), however not the relevant historical information.

Information on actual physical flows at interconnection points is published regularly on ENTSOG's Transparency Platform.

The information required by Article 3(4) of Annex I of the Regulation 715/2009 is still not published by the transmission system operator.

Annex: List of Publication Items Monitored

The following table provides a detailed assessment of the compliance status with the individual publication requirements of Annex I of Regulation (EU) 715/2009. Fulfilled requirements are marked green, whereas lack of compliance is marked red. Displayed information is based on the survey among Contracting Parties. In addition links to the published information can

be found here: [Transparency_2017.xlsx](#)

Relevant Article of Annex I of Regulation 715/2009	Short description of information that has to be published	Bosnia and Herzegovina	Georgia	Moldova	Serbia	Ukraine	fYR of Macedonia
1.9.	Planned maintenance periods that might affect network users' rights from transport contracts and corresponding operational information with adequate advance notice; changes to planned maintenance periods; updated regularly	yes	no	no	yes	yes	yes
3.1.2.a	Detailed and comprehensive description of the different services offered and their charges	yes	no	yes	yes	yes	yes
3.1.2.b	Different types of transportation contracts available for these services	no	no	no	yes	yes	yes
	Network code and/or the standard conditions outlining the rights and responsibilities of all network users including:	yes	no	no	yes	yes	yes
	1. Harmonized transportation contracts and other relevant documents;	yes	no	no	yes	yes	yes

Relevant Article of Annex I of Regulation 715/2009	Short description of information that has to be published	Bosnia and Herzegovina	Georgia	Moldova	Serbia	Ukraine	fYR of Macedonia
3.1.2.b	2. if relevant for access to the system, for all relevant points as defined in paragraph 3.2 of this Annex, a specification of relevant gas quality parameters, including at least the gross calorific value and the Wobbe index, and the liability or costs of conversion for network users in case gas is outside these specifications;	yes	no	yes	yes	yes	yes
	3. if relevant for access to the system, for all relevant points information on pressure requirements;	yes	no	yes	yes	yes	yes
	4. the procedure in the event of an interruption of interruptible capacity, including, where applicable, the timing, extent, and ranking of individual interruptions (for example pro-rata or first-come-last-interrupted);	yes	no	no	no	yes	yes
3.1.2.d	Harmonised procedures applied when using the transmission system, including the definition of key terms	yes	no	yes	yes	yes	yes
3.1.2.e	Publish provisions on:						
	1. capacity allocation	yes	no	no	yes	yes	yes
	2. congestion management	yes	no	no	yes	yes	yes
	3. anti-hoarding	no	no	no	no	no	no
	4. reutilization procedures	no	no	no	no	no	no
3.1.2.f	Rules applicable for capacity trade on the secondary market vis-à-vis the transmission system operator	no	no	yes	yes	yes	no
3.1.2.g	Rules on balancing and methodology for the calculation of imbalance charges	yes	no	no	yes	yes	no
3.1.2.h	the flexibility and tolerance levels included in transportation and other services without separate charge, as well as	yes	no	no	yes	yes	yes

Relevant Article of Annex I of Regulation 715/2009	Short description of information that has to be published	Bosnia and Herzegovina	Georgia	Moldova	Serbia	Ukraine	fYR of Macedonia
3.1.2.h	any flexibility offered in addition to this and the corresponding charges		no	no	no	NA	yes
3.1.2.i	Detailed description of the gas system of the transmission system operator and its relevant points of interconnection as defined in paragraph 3.2 of this Annex	yes	no	yes	no	yes	yes
3.1.2.i	Names of the operators of the interconnected systems or facilities		no	yes	no	yes	yes
3.1.2.j	Rules applicable for connection to the system operated by the transmission system operator	yes	no	no	yes	yes	yes
3.1.2.k	Information on emergency mechanisms, as far as it is the responsibility of the TSO, such as measures that can lead to the disconnection of customers groups and other general liability rules that apply to the transmission system operator	yes	no	no	yes	yes	yes
3.1.2.l	Procedures agreed upon by TSOs at interconnection points, of relevance for access of network users to the transmission systems concerned, relating to interoperability of the network	yes	no	no	yes	yes	
3.1.2.l	Agreed procedures on nomination and matching procedures	yes	no	yes	yes	yes	
3.1.2.m	Detailed and comprehensive description of the methodology and process, including information on the parameters employed and the key assumptions, used to calculate the technical capacity	yes	no	no	no	no	no

Relevant Article of Annex I of Regulation 715/2009	Short description of information that has to be published	Bosnia and Herzegovina	Georgia	Moldova	Serbia	Ukraine	fYR of Macedonia
3.3.1., 3.3.2., 3.3.3.	At all relevant points the following information for all services and ancillary services:						
	(a) the technical capacity for flows in both directions;	yes	no	yes	yes	yes	no
	(b) the total contracted firm and interruptible capacity in both directions	no	no	no	yes	yes	no
	(c) the nominations and re-nominations in both directions;	no	no	no	no	no	no
	(d) the available firm and interruptible capacity in both directions;	yes	no	yes	no	no	no
	(e) actual physical flows;	no	no	no	no	yes	no
	(f) planned and actual interruption of interruptible capacity;	no	no	no	no	yes	no
	(g) planned and unplanned interruptions to firm services as well as the information on restoration of the firm services (in particular, maintenance of the system and the likely duration of any interruption due to maintenance).	no	no	no	yes	yes	no
3.3.4.	Measured values of the gross calorific value or the Wobbe index at all relevant points, on a daily basis	no	yes	no	yes	yes	no
	Preliminary figures at the latest 3 days following the respective gas day	no	no	no	yes	no	no
	Final figures within 3 months after the end of the respective month	no	no	no	yes	yes	no

Relevant Article of Annex I of Regulation 715/2009	Short description of information that has to be published	Bosnia and Herzegovina	Georgia	Moldova	Serbia	Ukraine	fYR of Macedonia
3.3.5.	Available capacities, booked and technical capacities, on an annual basis, for all relevant points,	yes	no	no	no	yes	no
	over all years where capacity is contracted plus 1 year, and	no	no	no	no	no	no
	at least for the next 10 years.	no	no	no	no	no	no
	(a) interconnection point where the capacity is sold;	no	no	no	no	no	no
	(b) type of capacity, i.e. entry, exit, firm, interruptible;	no	no	no	no	no	no
	(c) quantity and duration of the capacity usage rights;	no	no	no	no	no	no
	(d) type of sale, e.g. transfer or assignment;	no	no	no	no	no	no
	(e) the total number of trades/transfers;	no	no	no	no	no	no
(f) any other conditions known to the TSO as mentioned in 3.3.	no	no	no	no	no	no	
3.3.6.	(a) a description of standardised products which can be sold on the secondary market;	no	no	no	yes	no	no
	(b) lead time for the implementation/acceptation/registration of secondary trades. In case of delays the reasons have to be published;	no	no	no	yes	no	no
	(c) the notification to the transmission system operator by the seller or the third party as referred to under 3.4(1) about name of seller and buyer and capacity specifications as outlined in 3.4(1).	no	no	no	yes	no	no
3.4.3.	Regarding the balancing service, does the TSO provide to each network user, for each balancing period, its specific preliminary imbalance volumes and cost data per individual network user, at the latest 1 month after the end of the balancing period?	no	no	no	yes	yes	No
	Is final data of customers supplied according to standardised load profiles within 14 months later provided?	no	no	no	yes	no	No

Relevant Article of Annex I of Regulation 715/2009	Short description of information that has to be published	Bosnia and Herzegovina	Georgia	Moldova	Serbia	Ukraine	fYR of Macedonia
3.4.4.	Are flexibility services, other than tolerances, for third party access offered?	no	no	no	no	no	No
	Is ex-post information on the aggregate utilization of every flexibility service at the end of each gas day published?	no	no	no	no	no	No
3.4.5.	Per balancing zone:						
	The amount of gas in the transmission system at the start of each gas day and	nap	no	no	no	no	No
	The forecast of the amount of gas in the transmission system at the end of each gas day	nap	no	no	no	no	No
	Is amount of gas in the transmission system published on an hourly basis?	nap	no	no	no	no	No
	Alternatively, per balancing zone:						
	The aggregate imbalance position of all users at the start of each balancing period	nap	no	no	no	no	no
	The forecast of the aggregated imbalance position of all users at the end of each gas day	nap	no	no	no	no	no
3.4.6.	Are user-friendly instruments for calculating tariffs provided?	nap	no	no	no	no	no