



**Public consultation of the French
Energy Regulatory
Commission on the project of
operating extension of
the Fos Tonkin liquefied natural
gas terminal**

ENAGÁS RESPONSE

14th June 2011

1. Executive summary

1. In this response Enagás asks for providing a level playing field for all potential infrastructure projects adding entry capacity in the South of France. In particular for:
 - the reconsideration of MidCat OS now that the ERIDAN project has been approved. The approval by the CRE is subject to obtaining EU funds that are linked to the development of the Africa-Spain-France axis; and
 - a non-discriminatory allocation of ERIDAN costs to MidCat when compared to Fos Tonkin (namely, no costs of the ERIDAN project are to be allocated to Fos Tonkin, while 50% of them were allocated to MidCat in the 2015 OS held in 2010).
2. In September 2009 Elengy launched an invitation to subscribe for capacity at the Fos Tonkin terminal aimed at expanding the operation of the terminal beyond 2014. The results of the binding phase did not allow the company to adopt an investment decision.
3. The expansion of Fos Tonkin entailed additional investments necessary on the core of GRTgaz transmission network for the network to run properly. In words of CRE in 2009 *if at least one of the LNG terminal projects in the south of France (Fos Faster or Fos Tonkin) or the interconnection project between France and Spain via the East Pyrenees (MidCat) were launched, the ERIDAN project would then be necessary for the network to run properly.*ⁱ However none of them was triggered in 2010.
4. On 19th April 2011, after a two-week consultation among some stakeholders launched in mid-March, CRE approved the modification of GRTgaz's 2011 Annual Investment Plan to include ERIDAN project.ⁱⁱ The CRE clarified that ERIDAN project would bring benefits for *"the French market by developing the fluidity of the zone and facilitating the merger of the North and South zones"*. This was in line with GRTgaz proposal highlighting, amongst other, the additional 40 GWh/d linepack created by the project and required for supplying 8 CCGT in the area. The CRE also argued that the project would benefit *"the European market by contributing to the development of the North-South corridor in Western Europe"*, though this latter benefit will be clearly limited if the interconnection with Spain is not developed and capacities are used by an LNG project. According to the CRE's analysis, by 2016-2017, the rise in the gas transport tariff due to the ERIDAN project would be between 2% and 3%.
5. The approval was also subject to the confirmation that 74 million € of European Energy Programme for Recovery would be allocated to ERIDAN. These were part of the funds granted for the Africa-Spain-France axis, and then allocated to the ERIDAN project on the basis that these extra capacities at Artère du Rhône were necessary to transport those volumes to the North of Europe.

6. On 4th April 2011, only a few days before the approval of ERIDAN project by CRE, Elengy relaunched an Open Season for the operating extension of Fos Tonkin LNG terminal which commercial operation is planned until October 2014.
7. In this context Enagás would like to highlight that,
 - Fos Tonkin OS is being relaunched at a moment when it can take advantage of CRE's previous approval of ERIDAN project. It is unclear that ERIDAN development costs, or a portion of them, will be allocated to Fos Tonkin users, since according to the consultation only the present pipe connecting the terminal the core network of GRTgaz in Saint-Martin-de-Crau is taken into account. This is a sharp contrast with the requisites established for the OS of MidCat in 2010 (2015 OS), where half of the costs of ERIDAN were allocated to MidCat users.
 - Enagás had previously expressed in March during ERIDAN consultation, and insisted to the CRE and MEEDDAT in the South Gas Regional Initiative on 6th May 2011, that the approval of the ERIDAN project, should this project receive the referred European funds, must be linked to the obligation to reconsider MidCat Open Season under enhanced conditions.
 - According to Enagás' estimates, based on the experience gained in 2010 during the MidCat OS, this would allow option MC0 (MidCat with capacity from Spain to France only) to be viable with a long-term demand around 100-115 GWh/day, at the current entry price. These estimates were already facilitated to the CRE during ERIDAN consultation and again in May. This would only entail applying similar conditions to those being proposed for Fos Tonkin now (no allocation of ERIDAN costs), maintaining the conditions of the previous Economic Test for MidCat (i.e. ensuring the recovery under long-term booking of 70% of the cost), and taking into account in this Economic Test the funds which are unequivocally related to the construction of MidCat (Africa-Spain-France axis).
8. Enagás would like to highlight that a level playing field should be provided for all infrastructure projects. This implies reconsidering MidCat OS without any allocation of ERIDAN's costs, but taking into account the 74 million € of funds granted to ERIDAN as part of the Africa-Spain-France axis.
9. Moreover, MidCat would bring benefits in terms of European integration and market interconnection that should be properly taken into account.

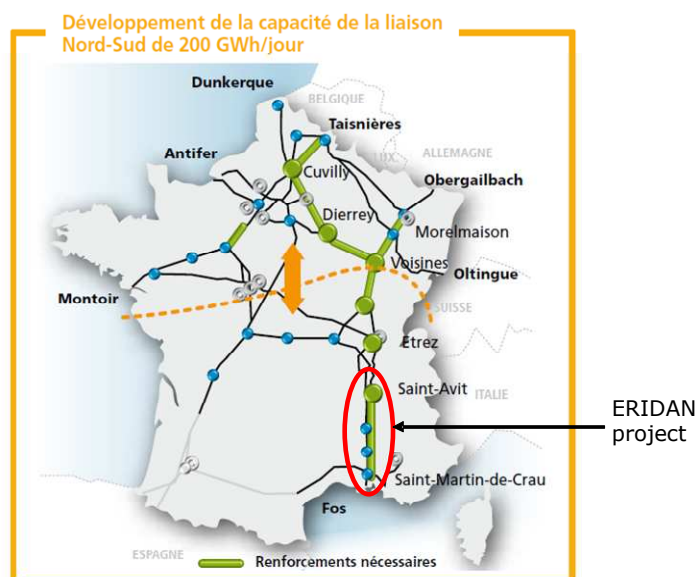
2. General comments.

10. Enagás welcomes CRE's initiative and its invitation to stakeholders to provide comments to the Public Consultation on the project of operating extension of the Fos Tonkin LNG terminal.

Approval of ERIDAN project

11. On 15th February 2011, GRTgaz requested CRE to modify its Annual Investment Plan to include ERIDAN project. It should be noted that ERIDAN project is a necessary infrastructure for all projects which imply an increase of capacity in the South of France; i.e. the construction of new LNG terminals in the South region or the increase of capacity of the existing ones, the development of MIDCAT project between Spain and France and the merging of balancing zones within France.
12. GRTgaz argued in favour of ERIDAN project that it increases the fluidity of the zone and facilitates the merger of the North and South zones, and benefits the European market by contributing to the development of the North-South corridor in Western Europe – though this latter benefit will be clearly limited if the interconnection with Spain is not developed and capacities are used by an LNG project. Among the benefits cited were:
 - Security of supply and network integration/"fluidification" provided by 120 GWh/day created in the area, allowing new entry points (underground storage, LNG terminal or international interconnection in the TIGF area).
 - 40 GWh of additional linepack, required for flexibility purposes for 8 new CCGT projects, and that would have to be met by alternative investments if ERIDAN was not decided.
 - The reduction of pressure needs in the South area, avoiding other investments (80 million € in C.S. Bégude) and operation costs in others compression stations.
 - The possibility to obtain funds from the EU – in particular, the 74 million EUR already awarded to certain infrastructures of the project in the context of the Africa-Spain-France axis.
 - Validity of studies and procedures already performed for ERIDAN and, if reconsidered, for other related projects such as MidCat.
 - Enhance conditions to proceed with the "market coupling" proposal by GRTgaz between its North and south areas.
 - A necessary (but not sufficient) step for the merge of the two GRTgaz areas would be completed

Figure 1: ERIDAN project



Source: *Étude prospective du développement du réseau de transport de GRTgazⁱⁱⁱ*

13. The cost of ERIDAN project is estimated in 484 €M according to the modification of GRTgaz’s 2011 investment program. It comprises:
 - The installation of a new pipeline of a diameter of 1,200 mm covering 220 km for an estimated 417 M€, and
 - The adjustment of the Saint-Martin-de-Crau and Saint-Avit interconnection stations for 50 M€ and 17 M€ respectively.
14. After having consulted with the market, on 19th April 2011 CRE approved the modification of GRTgaz’s 2011 Annual to include ERIDAN projectⁱⁱ provided the granting of the European Energy Programme for Recovery subsidy is confirmed.
15. The CRE clarified that “if no infrastructure project is developed in the south of France, the cost of the project for GRTgaz may not be completely covered by the new income and savings generated. Part of the ERIDAN cost would therefore have to be shared in the GRTgaz tariff. In this instance, by 2016-2017, the rise in the gas transport tariff due to the ERIDAN project would be between 2% and 3% according to estimates.” This is, in Enagás opinion, a very limited increase compared to the benefits that for the French market the project will bring.
16. It must be highlighted that the 74 million € of European Energy Programme for Recovery funds were part of the funds granted for the Africa-Spain-France axis, not ERIDAN project itself, and then allocated to the ERIDAN project because of its necessity to transport those volumes to the North of Europe.

17. Thus, Enagás view is that an approval of the ERIDAN project should be linked to the obligation to reconsider MidCat (i.e. Africa-Spain-France axis) Open Season under enhanced conditions.

Table 1: Extract from REGULATION (EC) No 663/2009

31.7.2009 EN Official Journal of the European Union L 200/41

ANNEX

ELIGIBLE PROJECTS

A. Gas and Electricity infrastructure projects

1. Gas interconnectors

Project	Location of projects supported	Envisaged Community contribution (EUR million)
Mediterranean		
Reinforcement of FR gas network on the Africa-Spain-France axis	France	200

18. Besides, during the 16th IG meeting of the S-GRI Enagás noted that the 74 million € of European funds that were part of the funds granted for the Africa-Spain-France axis by the European Recovery Action Plan, and that the approval of the ERIDAN project was subject to obtaining the funds, but not to the reconsideration of the MidCat project. The CRE and MEEDDAT refused to comment on whether the EC would grant these funds to ERIDAN although no reconsideration of the Africa-Spain-France axis is foreseen.

Fos Tonkin OS

19. In September 2009 Elengy launched an invitation to subscribe capacity at the Fos Tonkin terminal. On 11th June 2010 Elengy published in its website the result of the Fos Tonkin Open Season. The Fos Tonkin Open Season was closed without allocating any capacity. According to Elengy, the results of the binding phase confirmed the interest of the market for regasification capacities significantly over 3 bcm/year over 20 years. Nevertheless, it is obvious that it was not sufficient to adopt an investment decision aimed at expanding the operation of the terminal beyond 2014.
20. The Public Consultation launched by CRE in 2009ⁱ concerning the Fos Tonkin LNG terminal continuation project stated that the interface point between the LNG terminals of the Fos zone (Fos PITTM) and the GRTgaz transmission network located in Saint-Martin-de-Crau presented a firm entry capacity of 410 GWh/d, which was adapted to firm send-out capacity of the Fos Cavaou terminal of 8.25 Bcm/year and a firm send-out capacity of the Fos Tonkin terminal of 3 Bcm/year. Any additional Fos PITTM entry capacity would therefore require investments on the so-called core transmission network in order to ensure

additional firm entry capacities at this point. The necessary project to develop transmission capacities on the South-North link was ERIDAN project:

"if at least one of the LNG terminal projects in the south of France (Fos Faster or Fos Tonkin) or the interconnection project between France and Spain via the East Pyrenees (MidCat) were launched, the ERIDAN project would then be necessary for the network to run properly."

21. Thus, it is clear that the ERIDAN project is a core infrastructure project required for the subsequent project to create firm entry capacities in the GRTgaz South zone.
22. Having said this, only a few days before the approval of ERIDAN project by CRE in April 2011, Elengy relaunched an Open Season for the operating extension of Fos Tonkin LNG terminal which commercial operation is planned until October 2014.
23. Thus, Fos Tonkin OS is being relaunched at a moment when it can take advantage of CRE's previous approval of ERIDAN project. It is unclear that ERIDAN development costs, or a portion of them, will be allocated to Fos Tonkin users, as explained below.
24. As cited by the CRE in the public consultation of this 2011 Fos Tonkin OS, the economic investments related to the connection between a methane terminal and the transmission network must be taken into account:

"The decree of October, 6th, 2008 giving approval for the tariffs of use of gas transmission networks (named tariffs "ATRT4"), entered into force on January, 1st, 2009, defining rules applying to interface between transmission network and methane terminals (PITTM):

[...]

- *economic test for investments related to the connection between a methane terminal and the transmission network:*

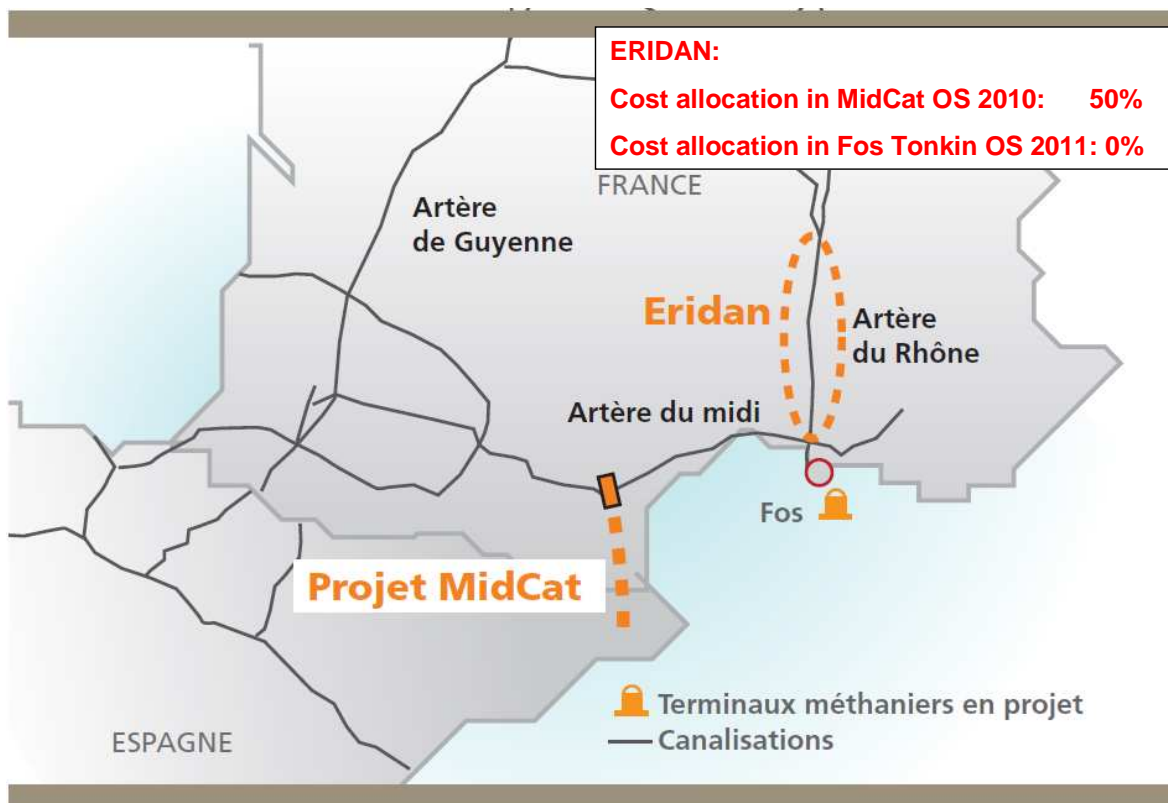
'The economic test is based on the principle that all the generated incomes by subscription of entry capacity on the transmission network from the methane terminals must enable the covering of the cost of the investments between the terminal and the core of the transmission network, on a 20 years period.

If that pre-requisite is not respected, then the entry term on the transmission network from the methane terminal will be increased or the TSO shall request a contribution to the operator in order to cover the cost of its connection investments."

25. I.e., according to the consultation only the present pipe connecting the terminal the core network of GRTgaz in Saint-Martin-de-Crau is taken into account, and

the ERIDAN project, which includes investments from Saint-Martin-de-Crau to the North, has not been taken into account. This is a sharp contrast with the requisites established for the OS of MidCat in 2010 (2015 OS), where half of the costs of ERIDAN were allocated to MidCat users, as shown in the map below.

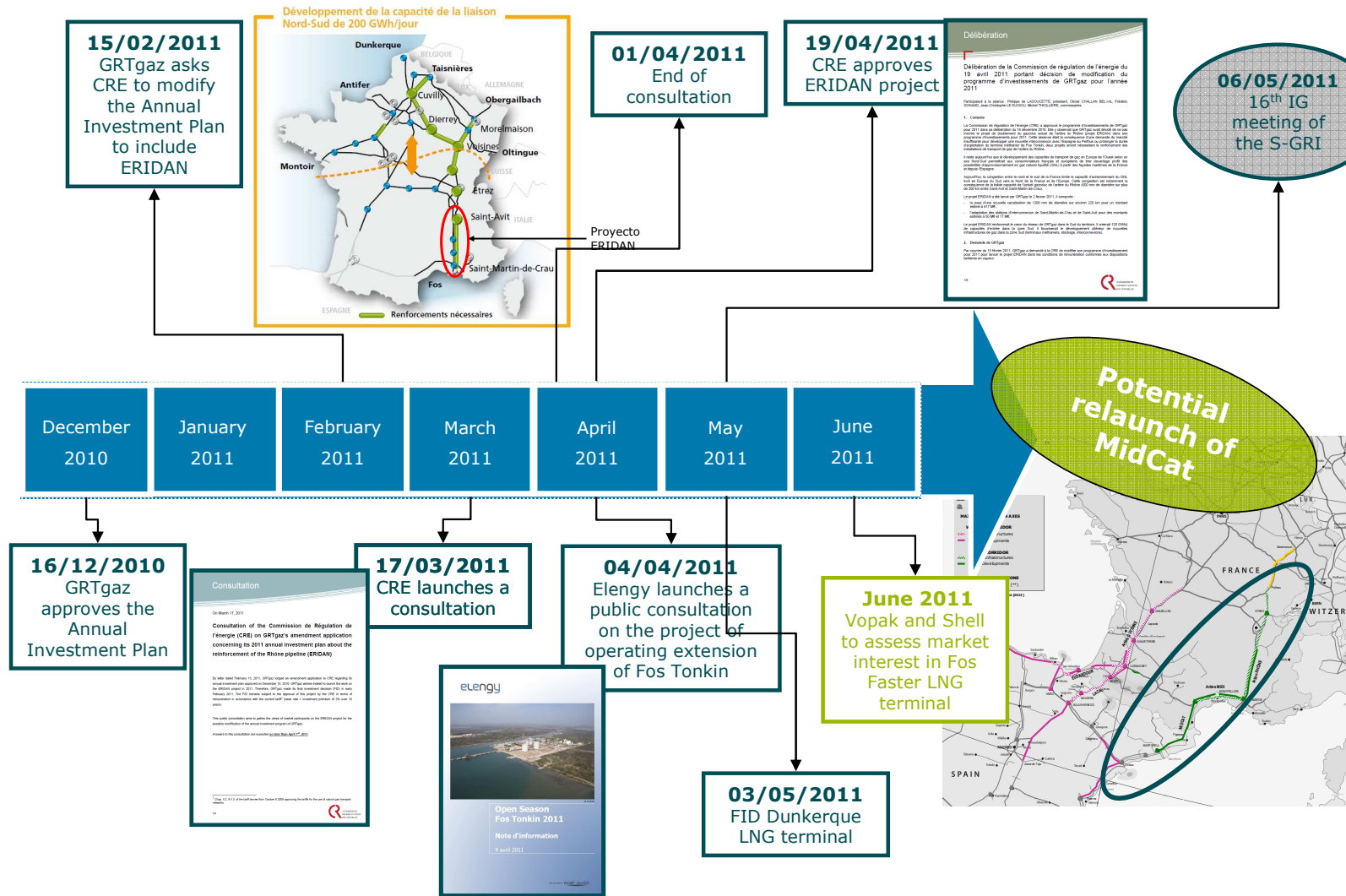
Figure 2: Cost allocation of ERIDAN project to MidCat and Fos Tonkin OSs



Source: GRTgaz and self made

26. Additionally, it is foreseen that Vopak and Shell will assess market interest for additional regasification capacity between June and October at the proposed third LNG terminal at Fos-sur-Mer in the South of France, according to a release from their joint venture, Fos Faster LNG Terminal on 13th May 2011. The conditions that will be imposed on this OS, or the allocation of costs of potential reinforcements, if required, are not commented in CRE’s public consultation of the operating extension of Fos Tonkin LNG terminal.

Figure 3: Timeline for ERIDAN project and other related infrastructure developments



Relaunch of MidCat OS

27. Enagás view is that an approval of the ERIDAN project should be linked to the obligation to reconsider MidCat Open Season under enhanced conditions.
28. While in the original Open Season ERIDAN infrastructures were included, and 50% of costs allocated, it becomes obvious now that the project is required by the French market, and a different allocation of costs could be considered. This is reinforced by the fact that no costs from ERIDAN are allocated to Fos Tonkin, and a level playing field should be ensured for all infrastructure projects.
29. In the 2015 OS, the MidCat project and the GRTgaz North-GRTGaz South link project shared two infrastructures:
 - Artère du Rhône (505 M€ according to the data facilitated in the OS)
 - CS Etrez (49 M€ according to the data facilitated in the OS).
30. The allocation of 50% of costs from Artère du Rhône and CS Etrez to MidCat in the Open Season, although the whole 74 M€ of funds granted were considered ($[(505+49)/2 - 74 = 203 \text{ M€}]$), decreased the possibilities of MidCat to be validated. Although these infrastructures were also required for the GRTgaz North-GRTGaz South link project, paradoxically, no costs from them were allocated to the link. This resulted in the OS in the link GRTgaz North-GRTGaz South passing its own the Economic Test, but the impossibility to develop the project, because Artère du Rhône and CS Etrez were not going to be built.

Table 2: Infrastructure development in France for MidCat, 2015 OS

Infrastructure	km	D (")	P (MW)	Estimated Investment (M€)	OPTION	
Spanish Border-Barbaira	120	32		240		
Pipeline Lupiac - Barran	28	32		40		
CS Barbaira			10	40		
Pipeline Artère du Rhône	200	42-48		505		
CS Etrez			20	49		
CS St Martin de Crau			10	50		
TOTAL without N-S capacity				924		MC0
<i>CS Montpellier</i>			15/20	80		
TOTAL 80 GWh technical N-S capacity				1,004		MC1
<i>Pipeline Artère du Midi</i>	220	36		320		
<i>Pipeline Cruzy-Barbaira</i>	40	32		70		
TOTAL 180 GWh technical N-S capacity				1,314		MC2

Note that costs included in the Economic Test for each option include only 50% of costs from Artère du Rhône and CS Etrez), and the threshold was lowered by 74 m€ from EU funds (resulting in a total cost allocated to each option of 572.84 M€ for MC0, 652.84 M€ for MC1, 962.84M€ for MC2).

Table 3: Infrastructure development for GRTGaz North – GRTGaz South link, 2015 OS

Infrastructure	km	D (")	P (MW)	Estimated Investment (M€)	OPTION
Pipeline Morelmaison - Palleau	190	42-48		398	
Pipeline Artère du Rhône	200	42-48		505	
CS Etrez			20	49	
TOTAL				952	NS1

Capacity calculations between GRTgaz North and GRTgaz South, obtained through investment in Morelmaison-Palleau pipeline, have been performed assuming that the reinforcement of Artère du Rhône and CS Etrez are developed in advance (as shown in the table), as well as other developments in the GRTgaz North market zone.

Note that only 398 million € were included in the Economic Test

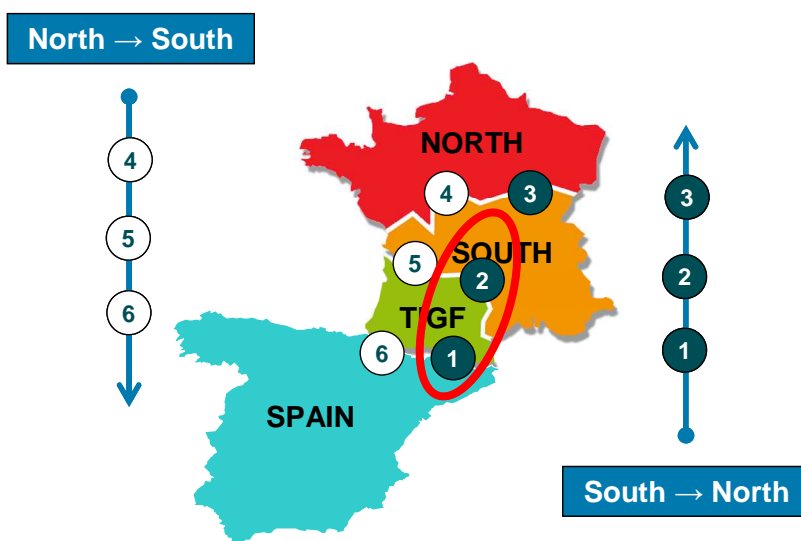
31. Enagás suggests to relaunch the Open Season without any allocation of ERIDAN's costs, but taking into account in the Economic Test 74 million € of funds granted to the Africa-Spain-France axis.
32. The total cost due to investments in France for MidCat would be 370 M€ (only direct costs), and in the Economic Test the allocation would be 296 M€ (taking into account the 74 M€ that are part of the funds allocated to the Africa-Spain-France axis).
33. Enagás has reproduced, according to its understanding, the Economic Test developed by the CRE, in cooperation with the CNE, and believes that the chances of passing the test, even at the minimum price, would be enormously enhanced. It has to be admitted, however, that with the demand not attended in the 2015 OS, the project would have not been validated even under this enhanced conditions.
34. A simple but effective approach to reproduce the Economic Test is to assume that during the first 10 years, the cost caused by investments would be 12% of their investment value. The CRE, taking into account the benefits from the project, and that only 80% of total capacity was offered in the OS, decided to establish the threshold of the Economic Test in covering through TPA tariffs 70% of such cost:

Table 4: Annual cost (M€) to be covered by TPA tariffs (est. in 12% of investment)

	12% of investment									
	MC2+B1	MC2+B0	MC1+B0	MC0+B0	MC2	MC1	MC0	B1	B0	
Pipeline Arcanques-Coudoures	13.20	13.20	13.20	13.20	13.20	13.20	13.20	13.20	13.20	
Spanish Border-Barbaira	28.80	28.80	28.80	28.80	28.80	28.80	28.80	28.80	28.80	
Pipeline Lupiac - Barren	4.80	4.80	4.80	4.80	4.80	4.80	4.80	4.80	4.80	
Pipeline Artère du Rhône	21.40	21.40	21.40	21.40	21.40	21.40	21.40	21.40	21.40	
Pipeline Artère du Midi	38.40	38.40	38.40	38.40	38.40	38.40	38.40	38.40	38.40	
Pipeline Cruzy-Barbaira	8.40	8.40	8.40	8.40	8.40	8.40	8.40	8.40	8.40	
Pipeline Morelmaison-Palleau	47.76	47.76	47.76	47.76	47.76	47.76	47.76	47.76	47.76	
CS Montpellier	9.60	9.60	9.60	9.60	9.60	9.60	9.60	9.60	9.60	
CS Barbaira	4.80	4.80	4.80	4.80	4.80	4.80	4.80	4.80	4.80	
CS St Martin de Crau	6.00	6.00	6.00	6.00	6.00	6.00	6.00	6.00	6.00	
CS Etrez	2.94	2.94	2.94	2.94	2.94	2.94	2.94	2.94	2.94	
TOTAL	138.34	128.74	91.54	81.94	115.54	78.34	68.74	22.80	13.20	
70%	96.84	90.12	64.08	57.36	80.88	54.84	48.12	15.96	9.24	

35. According to Enagás estimates, MC0 could have only been validated in the 2015 OS with a total capacity allocation at IP1 and IP2, and a minimum price of 120 €/MWh/d.

Figure 4: IPs between balancing zones in France and Spain for which capacity was offered at the 2015 OS



36. However, with the cost allocation proposed now (no costs from ERIDAN at all), MCO would have been validated with only 61% of demand (112 GWh/d). If the cost of the CS Etrez was not included, 56.3% would suffice (103.6 GWh/d).

Table 5: Economic Test for MCO (70% cost coverage required by the CRE)

Figures in million €	12% of investment	MCO Full cost	MCO without Artère du Rhône	MCO without Artère du Rhône & CS Etrez
Spanish Border-Barbaira	28.80	28.80	28.80	28.80
Pipeline Lupiac - Barren	4.80	4.80	4.80	4.80
Pipeline Artère du Rhône	21.40	21.40	-8.90	-8.90
CS Barbaira	4.80	4.80	4.80	4.80
CS St Martin de Crau	6.00	6.00	6.00	6.00
CS Etrez	2.94	2.94	2.94	
TOTAL	100%	68.74	38.44	35.50
	70%	48.12	26.91	24.85
Tariffs capacity allocated = 100%	IP1	16.56	16.56	16.56
	IP2	27.60	27.60	27.60
Cost coverage (TPA tariffs / 12%investment)	IP1+IP2	64%	115%	124%
Tariffs capacity allocated = 61.0%	IP1	10.10	10.10	10.10
	IP2	16.84	16.84	16.84
Cost coverage (TPA tariffs / 12%investment)	IP1+IP2	39%	70%	76%
Tariffs capacity allocated = 56.3%	IP1	9.32	9.32	9.32
	IP2	15.54	15.54	15.54
Cost coverage (TPA tariffs / 12%investment)	IP1+IP2	36%	65%	70%

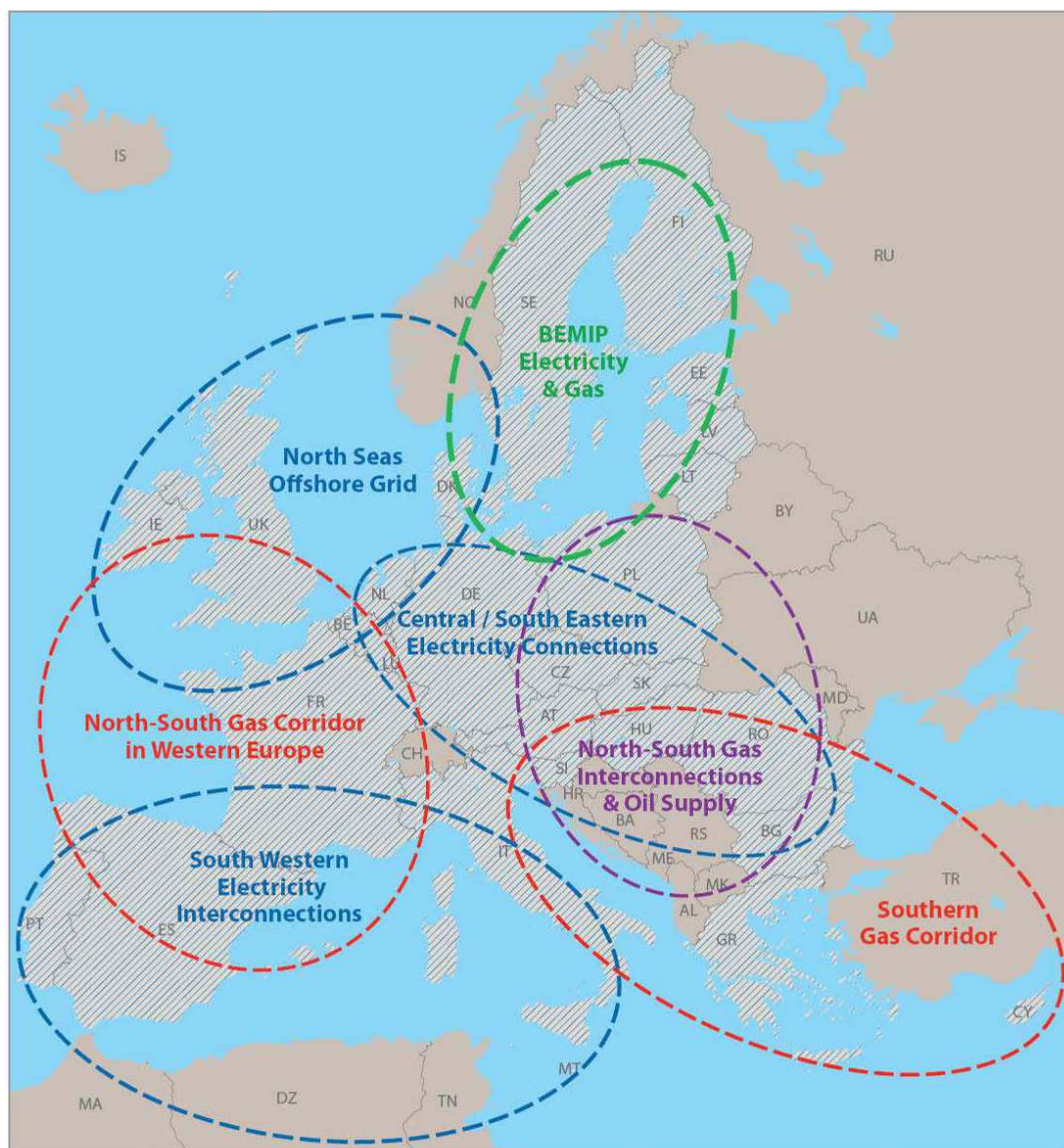
Note that Artère du Rhône includes EU Funds for 74 M€.

37. Enagás believes that a level of demand around 100-115 GWh/d (less than 4 bcm/year) could be attainable in a new Open Season for the current entry tariff in France.

Advantages of MidCat vs other infrastructure projects

38. The enhancement of gas interconnections between EU members is a key factor for the completion of the internal European gas market. In particular, the development of high-capacity international connections between France and Spain will contribute to enhance security of supply and to foster gas trade and consequently market liquidity and competition.
39. To achieve this objective it must be ensured that transmission corridors allowing for the flow of gas between the South of Spain and the North of France in both directions are developed. In this context, the development of gas interconnection capacity between France and Spain has been a priority objective of the ERGEG South Gas Regional Energy Market, fully supported by Enagás. In order for the project to be successful, investments and allocation procedures at the border must be coordinated with investments and allocation procedures at interconnection points between balancing areas within the two countries.
40. The importance of this corridor has been recognised in several documents namely:
 - The European Infrastructure Package^{iv} states (bold added) that *"The strategic concept of the North-South natural gas interconnections in Western Europe, that is from the Iberian peninsula and Italy to North-west Europe is to better interconnect the Mediterranean area and thus supplies from Africa and the Northern supply Corridor with supplies from Norway and Russia. **There are still infrastructure bottlenecks in the internal market which prevent free gas flows in this region, such as for example the low interconnection level to the Iberian peninsula, preventing the use of the well-developed Iberian gas import infrastructure to its best. The Spain-France axis has been a priority for over a decade, but is still not completed.** However, progress has been achieved in recent years, thanks to the better co-ordination of the national regulatory frameworks – taken up also as a priority by the South-West Gas Regional Initiative – and the active involvement of the European Commission."*

Figure 5: Priority corridors for electricity, gas and oil



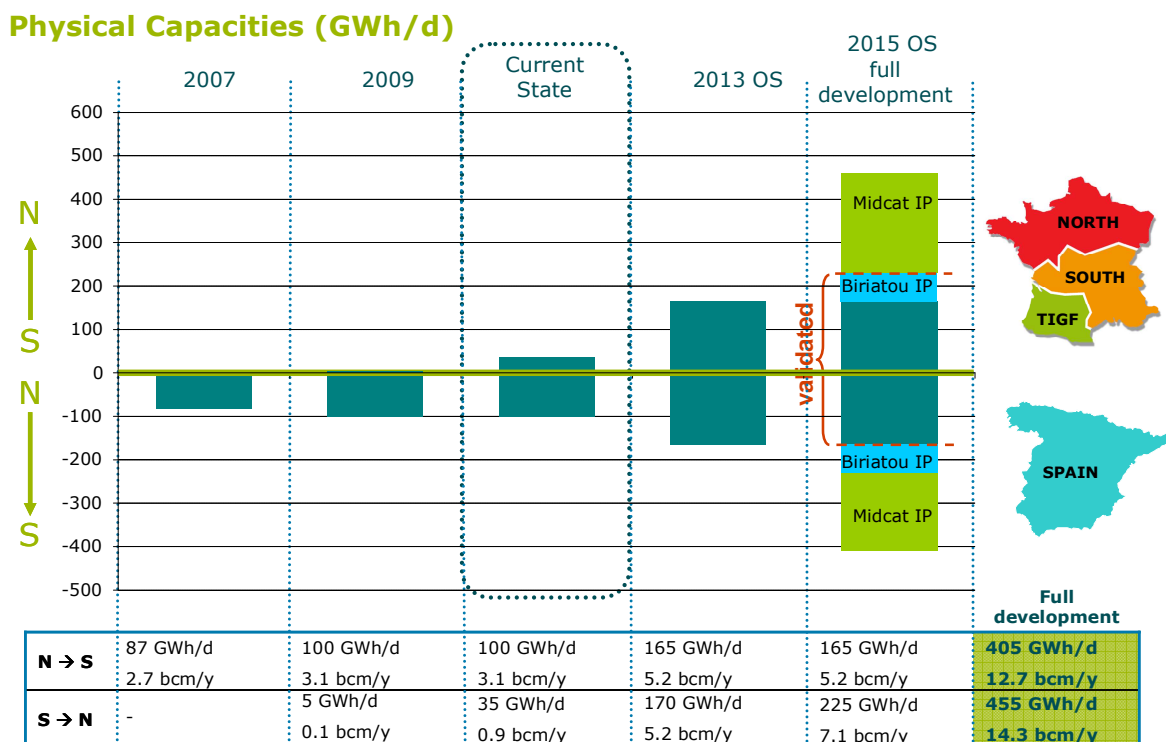
© European Union – Directorate-General for Energy – November 2010

- In the current version under consultation of the Ten Year Network Development Plan, approved by ENTSOG on 17th February 2011,^v it is stated that (bold added) **"there are only few internal EU bottlenecks that hamper an even spread of gas coming from predominant supply. The only limitation was found for LNG which is a counter-flow to the two main historical supply sources (Norway and Russia). Such limitation was identified for the Iberian Peninsula and Greece; in all cases this was due to the lack of capacity to France and Bulgaria respectively. In 2020 taking into account non-FID LNG terminal projects, even if the capacity**

congestion between Spain and France will have been relieved, the lack of eastward export capacity from France will hamper LNG maximization in Iberian Peninsula and France and its spread further into the European gas network."

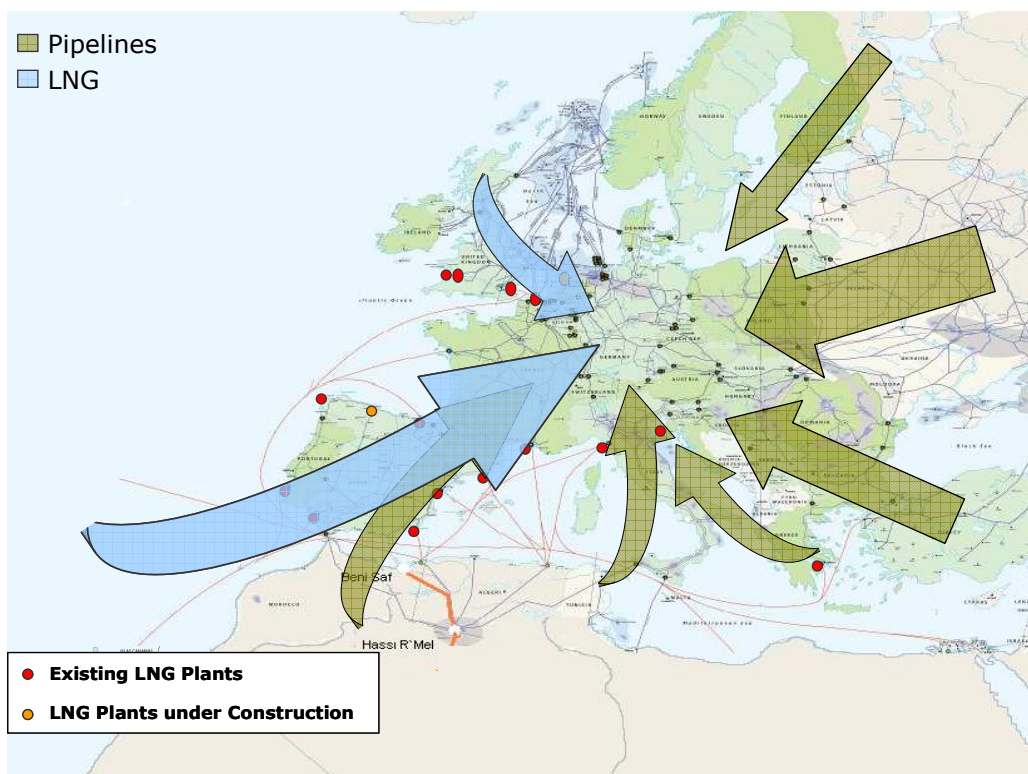
41. The development of additional capacity is already foreseen by 2013 (Larrau, triggered in 2009 by the 2013 OS) and 2015 (Biriadou, triggered in 2010 by the 2015 OS). The investments have been carried out on the basis of the coordination of Open Seasons and Open Subscription Periods to evaluate shippers' needs, obtain firm commitments and allocate capacity. Up to date, the development of further capacities (MidCat) has not received enough support from the market in terms of long-term commitments; in particular, demand registered during the 2015 OS was not enough to trigger investments related to MidCat.
42. The final results of both OS processes will significantly improve the integration of the Iberian and European gas markets as well as the security of supply. They are a good example of regional cooperation by regulators, governments, TSOs, the European Commission and shippers.
43. The development of further capacities between Spain and France is subject to the development of new capacities in the Artère du Rhône. This is why the EU decided in 2009 to allocate European funds from the European Energy Programme for Recovery to projects which were integral part of the ERIDAN project.

Figure 6: Development of interconnection capacity between Spain and France



44. Given the benefits that MidCat brings to the EU market, that is market integration and price convergence, liquidity, and SoS, Enagás believes that this project should be reconsidered and receive a non-discriminatory treatment in terms of allocation of transmission costs in France.

Figure 7: Existing and potential supply corridors to the EU



- i CRE: "Public consultation of the French Energy Regulatory Commission (CRE) on the LNG terminals operated by Elengy", 30 November 2009.
http://www.cre.fr/en/content/download/9232/160058/file/Note_technique_Terminaux_methaniers_Elengy_en.pdf
- ii CRE: "Deliberation of the Commission de régulation de l'énergie of 19 April 2011 deciding on the modification of GRTgaz's 2011 investment programme" , 19 April 2011.
http://www.cre.fr/en/content/download/10760/179059/file/110419ModificationInvestissement_sGRTgaz-en.pdf
- iii GRTgaz: "Etude prospective de développement du réseau de transport Période 2010-2019"
http://www.grtgaz.com/fileadmin/user_upload/Institutionnel/Documents/FR/etude-dev-reseau2010-2019FR.pdf
- iv EUROPEAN COMMISSION: "Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the regions - Energy infrastructure priorities for 2020 and beyond - A Blueprint for an integrated European energy network, COM(2010) 677 final", 17 Nov 2010.
<http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=CELEX:52010DC0677:EN:HTML:NOT>
- v ENTSOG, " ENTSOG Ten-Year Network Development Plan 2011-2020", 17 February 2011
http://www.gie.eu.com/adminmod/show.asp?wat=TYNDP_Report_110217_MQ.pdf