

## Response Sheet for Stakeholder Engagement Document: Potential Modifications to the CAM NC Following Receipt of ACER Opinion

Please complete the fields below and send via email using the subject title, “Response to the CAM NC stakeholder engagement document” to [info@entsog.eu](mailto:info@entsog.eu) by 10 August 2012.<sup>1</sup>

### Name

First and Last Name: Dr. Michael Wunnerlich

### Organisation

Company/Organisation Name: **BDEW e.V.**

Job Title: Member of the Management Board,  
Director of the Representation to the European Union

### Contact details

Email: Michael.wunnerlich@bdew.de

Tel: +32 2 771 96 42

Mobile:

### Address

Street: Avenue de Cortenbergh 52

Postal Code: 1000

City: Brussels

Country: Belgium

Countries in which your organisation operates: Germany

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<sup>1</sup> If you would like any part of your response to be treated as confidential, **please mark these sections clearly and explain why it is not possible for the information to be made public.** Notwithstanding any confidentiality undertaking upon request, ENTSOG indicates that this cannot prevent ENTSOG from disclosing all or part of the response that would be requested by a competent authority or judicial body.

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How would you describe your organisation?

- |                                     |                                   |
|-------------------------------------|-----------------------------------|
| <input checked="" type="checkbox"/> | Association (please specify type) |
| <input type="checkbox"/>            | End user                          |
| <input type="checkbox"/>            | Network user                      |
| <input type="checkbox"/>            | Trader                            |
| <input type="checkbox"/>            | Other (please specify)            |

In the questions below, ENTSOG would be grateful if respondents could clearly indicate their view and provide a brief justification.

### Question 1

A number of changes to the CAM NC submitted to ACER in March 2012 are proposed in sections C.1 – C.11 above. Please indicate whether you support these changes. If you do not support some changes, please indicate which changes you do not support, and why.

BDEW supports the following changes proposed by ENTSOG without any additional comments:

#### **C1-C4, C9 and C10**

To the other proposed changes BDEW wishes to go into a more detailed discussion:

**C5:** BDEW supports ENTSOGs consideration not to change the NC, because it should be left to the market which and in what amount capacity will be booked. Therefore higher quotas can lead to market barriers; the flexibility for higher quotas is already provided in the NC and the decision should be left to the NRAs.

**C6:** BDEW supports ENTSOGs consideration on this point. However we like to recall, that BDEW is concerned about the obligation on bundled products and the sunset clause.

**C7:** BDEW supports ENTSOGs view that the wording should be unchanged and the NRAs shall mediate upon request. Otherwise the question is who should take the role of a mediator, if parties are forced to amend their existing contracts because of the NRA initiated sunset clause.

**C8:** BDEW agrees only partially with the proposed changes. The NC can be changed to state if two TSOs wish to shorten the default lead time, they seek the approval of the relevant NRA. The proposed shortened default lead time (minus 45 min) cannot be approved (see answer to question 4).

**C11:** BDEW does not agree with the proposed deleting of Article 10.3. The possibility of an interim period might be helpful for the market participants.

#### Question 2

Do you support the proposed changes to the day ahead auction timing set out in section D.1? If not, why not?

BDEW supports the proposed changes to the day ahead auction timing.

#### Question 3

Do you support the proposed changes to the within-day auction timing set out in section D.2? If not, why not?

In particular, do you believe that a 30 minute bidding window and 60 minute nomination window are sufficient for a within-day process?

BDEW supports the proposed changes to the within-day auction timing and believes that a 30 minute bidding window and 60 minute nomination window are sufficient for a within-day process.

#### Question 4

Do you support the proposed changes to the drafting on default interruption lead times set out in section D.3? If not, why not?

As mentioned above in Question 1 referring C8 BDEW does not support the proposed changes. The proposed shortened default lead time (minus 45 min) cannot be approved. This timeframe leaves the shipper only 15 minutes to react in case of an interruption. A possibility seems to shorten the default lead time minus 30 minutes which leaves the shipper at least 30 minutes to react in case of an interruption.

#### Question 5

Do you support the proposed changes to article 4.1(2) of the CAM NC, in relation to competing capacities? If not, why not?

BDEW supports the proposed changes to article 4.1(2) of the CAM NC, in relation to competing capacities.

#### Contact Person:

Katharina Stecker  
Telefon: +49 30 300199- 1562  
katharina.stecker@bdew.de

Jeremias Pressl  
Telefon: +49 30 300199-1130  
jeremias.pressl@bdew.de