

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 by 10 August 2012.¹

Name

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¹ 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.

How would you describe your organisation?

<input type="checkbox"/>	Association (please specify type)
<input type="checkbox"/>	End user
<input checked="" type="checkbox"/>	Network user
<input checked="" 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.

C1: Definitions - Agree with ENTSOG.

C2: Standard Capacity Products – Agree with ENTSOG.

C2: Bundling – Agree, although it should be noted that we are against mandatory bundling of capacity, as we have previously stated in our response to the previous network code consultations.

C2: Capacity Quotas – We agree with ENTSOG that no change should be made to the network code regarding capacity quotas. However if a change were to be made it should be to increase the amount held back to 20%.

C4: TSO Cooperation – Agree with ENTSOG.

C5: Capacity Breakdown – We agree that there should not be changes to the code regarding capacity breakdown as the suggested changes would see another auction being included in the auction timetable. As we have stated in previous consultation responses we are in favour of having a long term auction that sells capacity in quarterly blocks. An alternative to a medium term auction is to increase the amount of quarterly capacity made available in the long term auctions. This could be done by selling quarterly capacity for the first five years, the remaining years would then be sold in annual strips.

C6: Sale of Unbundled Capacity – Agree with ENTSOG.

C7: Amendment of Existing Capacity Contracts – We agree with ENTSOG that the current wording should remain. Although it should be noted that we remain strongly opposed to mandatory bundling.

C8: Interruptible Capacity – We disagree with the proposed lead time of 1 hour 15 minutes. We would like to see a lead time of not less than 2 hours as this would give system users time to re-nominate and turn down their flows. Anything less than 2 hours lead time could lead to imbalance charges for the system user.

C9: Tariffs – We agree with ENTSOG. Tariffs should be dealt within the Framework Guideline and associated Network Code on Tariffs.

C10: Incentive Regimes – Agree with ENTSOG

C11: Interim Period – Agree with ENTSOG

Question 2

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

We support the changes proposed in section D1 regarding Day ahead Capacity Allocation. Although supporting the change, we would prefer to see the whole time frame moved back by half an hour so that system users were aware of their allocation by 17:00 CET.

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?

We support the proposed changes to the within day auction timing. A 30 minute bidding window and 60 minute bidding window should be 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 we stated in our answer to C8, we disagree with the proposed lead time of 1 hour 15 minutes. We would like to see a lead time of not less than 2 hours as this would give system users time to re-nominate and turn down their flows. Anything less than 2 hours lead time could lead to imbalance charges for the system user.

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?

As we understand it, the issue that D:4 is trying to solve only affects a very small number of IPs. Whilst we agree with the proposed solution we would like to see approval from the relevant NRAs be added to the suggested text for Article 4.1 (2) of the CAM Network Code.

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