

Responses to CAM Network Code – stakeholder support process

Consultation Response Sheet

Please complete the fields below and send via email using the subject title, “Response to the CAM NC consultation” to info@entsog.eu by 13 February 2012.

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How would you describe your organisation?

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

Question 1: Do you consider that the network code development process carried out by ENTSG was appropriate, given the boundaries of the framework guideline? In particular, was the level of stakeholder engagement appropriate? If there is room for improvement, please inform us about possible suggestions for improvement.

Yes X	No
<p>Comments:</p> <p>EDF Energy supports the process ENTSG developed. We were impressed by –</p> <ol style="list-style-type: none"> 1. Workshops which allowed us to test the CAM proposals and in particular the simulation model which allowed us to fully understand the auction process. 2. The formal consultations allowed us to give the appropriate feedback on the issues 3. The way in which stakeholders were able to articulate our views. During the development of the code the inclusion of yearly products shows how the process was flexible enough to change policy. 	

Question 2: Following the EC request to shift the day-ahead auction to the afternoon D-1, please indicate whether a day-ahead auction held from 16.30-18.00 local time in central Europe can be supported (see section 4.7 of the CAM NC).

Yes	No X
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If no, please give brief reasons and state how to consider this issue:

EDF Energy supports the shift of the day-ahead auction to the afternoon D-1 but 18.00 is too late in the day for the end of day-ahead auctions. Market participants will have difficulties in efficiently using capacity obtained on auctions, as the results will only be published **after** the daily settlement price is determined and after the market closes for a number of exchange-traded Day-Ahead gas contracts.

Question 3: Please complete the table below, indicating whether you support the relevant sections of the CAM NC, having regard to the process carried out and ENTSG's aim to reflect the views of the majority of users during the development process.

Section	1-2: Rationale and Application	3: Principles of co-operation	4: Allocation of firm capacity ¹	5: Cross-border capacity
Support	x	x	x	x
Do not support				

Section	6: Interruptible capacity	7: Tariffs	8: Booking platforms	9-11: Legal provisions
Support	x	x	x	x
Do not support				

Please provide brief reasoning for your responses, if you wish

¹ Please consider article 4 except the day-ahead suggestion which is tackled already above.

We support the introduction of bundled products that support hub to hub trading. Using sunset clauses on existing contracts is not necessarily more economically efficient when compared to capacity price alignment (e.g. through indexation). We would expect this alternative to have been more fully considered within the development of the code.

