

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 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 ENTSOG 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 considers that the process carried out by ENTSOG to develop this network code was very satisfactory. Indeed, ENTSOG allowed a very high level of stakeholder involvement using different tools (formal consultations, workshops, simulations, bilateral meetings...). Moreover, ENTSOG released, at every stage, a very good and detailed documentation that allowed stakeholders to give appropriate feedback and opinion. Last but not least, EDF appreciated the fact that ENTSOG produced this CAM Network Code in a very open-minded manner, listening to all stakeholders and duly taking into account, in the final text, their opinion whenever well documented and shared by a large number of stakeholders (as shown by the inclusion of yearly products or the adoption of a multiple round ascending clock auction design).</p>	

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
<p>If no, please give brief reasons and state how to consider this issue:</p> <p>EDF supports the shift of the day-ahead auction to the afternoon D-1 but considers that 18.00 local time in central Europe is too late for the end of day-ahead auctions. This would create significant challenges for market participants to make an efficient use of the capacity obtained on auctions, since auction results would be published after the daily settlement price is determined and after</p>	

the market closes for a number of exchange-traded Day-Ahead gas contracts.

EDF believes a suitable timetable for day-ahead auctions allowing the **publication of auction results before 16.00** can be established through:

- (i) **reducing the duration of the auction bidding window** from 90 to 30 minutes (which is sufficient time to place and check bids in the case of day-ahead auctions), and
- (ii) **bringing forward the gate closure time.**

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				

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

Please provide brief reasoning for your responses, if you wish

EDF supports the ENTSOG CAM Network Code proposals which reflect the broad majority of views. Indeed, as stated in Question 1, ENTSOG elaborated this Network Code in close consultation with stakeholder allowing them to express their views and criticisms.

However, EDF would like to underline two major points :

- Regarding section 5 dealing with cross-border capacity, EDF fully supports the introduction of bundled products and the progressive switch towards hub-to-hub trading. Nevertheless, the fact that the Sunset Clause is the most appropriate and efficient solution to achieve this goal still needs to be proven. Furthermore, EDF wonders why the question of capacity price alignment on the price revealed by the auction has not been explored more.
- Regarding section 7 on tariffs, EDF would like to stress that the provisions in the CAM Network Code shall only be considered as interim provisions in case the Framework Guidelines and Network Code on Tariffs come into force later.