

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.

Name

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Countries in which your organisation operates: www.eurogas.org

How would you describe your organisation?

<input checked="" type="checkbox"/>	Association	(please specify type) NATURAL GAS
<input type="checkbox"/>	End user	
<input 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	<input checked="" type="checkbox"/>	No
Comments: The development of the CAM Code launched ENTSG and stakeholders alike on a sharp learning curve and the ENTSG team are all to be congratulated on the consultation process they put in place and managed so efficiently. The stakeholder engagement was appropriate. Earlier availability of some meeting documents would have been welcome, but ENTSG already seems to be taking that improvement on board for the subsequent processes.		

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	<input checked="" type="checkbox"/>	No
<p>If no, please give brief reasons and state how to consider this issue:</p> <p>But, perhaps to fit the market better, the auction window should be shortened, e.g. by one hour along with the timescale for providing auction results.</p>		

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	
Do not support				X

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

Eurogas supports the proposed Code, except for Section 5. Eurogas does not support the obligation on bundled products and is strongly opposed to the sunset clause, which will lead to legal uncertainties, and may lead to shippers being burdened by capacity they do not want, and being forced to pay for it, or losing capacity they need. Eurogas does not support the default rule, because it does not see the value of unbundled capacity in a bundled world. On the other hand, it does not see a satisfactory default solution.

With regard to 7, Eurogas supports the proposals, but this is an interim position on proposals which are themselves interim, and Eurogas reserves the right to develop its thoughts eventually for the work on Harmonized Tariff Structures.

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