

## 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](mailto:info@entsog.eu) by 13 February 2012.

#### Name

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Countries in which your organisation operates: Italy, Germany, The Netherlands, Austria

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 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
<p>We highly appreciated the network code development process carried out by ENTSG, as it gave wide room for stakeholders involvement through formal (SJWS, public consultations) and informal (bilateral meetings, etc) exchanges of views. Moreover, we welcomed ENTSG's attitude to practically simulate the outcomes of the proposed options (auction design) in public workshops: this approach certainly facilitates the assessment of documents by network users. We think that the positive outcome of this open-minded approach results in a final Network Code that generally reflects the „desiderata“ of the majority of consulted stakeholders.</p> <p>We would also like to express our appreciation for the quality of the documentation accompanying the Network Code: the publication of an <i>Explanatory Note</i>, as well as of an <i>Analysis of ENTSG Decisions</i> is indeed a valuable tool for network users to interpret the provisions.</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	<input checked="" type="checkbox"/>
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Edison does not generally oppose to the postponement of the day-ahead capacity auction to the afternoon of D-1, but we think that the introduction of a closure at 18:00 local time in Central Europe could be too late. The risk is in fact that network users will know the results of day-ahead capacity auctions after the closure of commodity markets and would therefore be prevented from purchasing/selling gas accordingly to the result of the auction.

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 <sup>1</sup>	5: Cross-border capacity
Support	X	X	X	Partially: see comments
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

Edison would like to express its general support to the ENTSG CAM Network Code, as it is the result of wide and transparent consultation with European Stakeholders.

Nevertheless, we have concerns regarding some provisions included in Section 5 on cross-border capacity and in particular on the issue of bundled products. Although we believe that the introduction of bundled products will positively impact on shippers' cross-border trading activities and would certainly contribute to integrate European gas markets, the transition by means of a Sunset Clause could prove problematic. The implementation of a "partially unbundled default rule approach" will indeed leave shippers with the obligation to pay for unbundled firm capacity that

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

could not be used as such in the new unbundled world.

