

## 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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#### **Organisation**

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Countries in which your organisation operates:

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)

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:	<input checked="" type="checkbox"/>	No
<p>Comments:</p> <p>We agree that the process carried out by ENTSOG was appropriate. The SJWS gave users the opportunity to give feedback to ENTSOG during the drafting process. However it was disappointing that ACER and the Commission were not always represented at the stakeholder sessions.</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"/>
<p>If no, please give brief reasons and state how to consider this issue:</p> <p>We would prefer to see the bidding window shortened and the timing of the auction being held earlier than 16:30.</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 <sup>1</sup>	5: Cross-border capacity
Support	X	X		
Do not support			X	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

#### Allocation of Firm Capacity:

As we have stated in previous consultation responses we are in favour of quarterly products. It is disappointing that ENTSG have changed the products available in the final version of the code. Quarterly products would give system users flexibility to buy the capacity they actually need. Annual products will force shippers to purchase their peak winter requirements during periods where it is not needed thus leading to an inefficient use of capacity. This could also lead to contractual congestion. As the auctions are designed at the moment there is no ability for shippers to book monthly capacity one year in advance as the annual monthly auction is not included. The removal of this auction reduces the flexibility available to shippers when trying to optimise their portfolio.

#### Cross-border capacity:

We are strongly against the introduction of mandatory bundling of capacity. We do not agree with being forced to open up supply contracts to negotiate new delivery terms. As we have previously stated there are issues surround tax legislation that would have implication on system users if they

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

are forced to operate in another country. Bundled capacity products should be just one of the products that a TSO could offer alongside unbundled capacity giving maximum choice to system users. As such we are in favour of section 5 being removed from the network code.

