**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.

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Countries in which your organisation operates:

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| How would you describe your organisation? |

|  |  |  |
| --- | --- | --- |
|  | Association | (please specify type) |
|  | End user | |
| **X** | Network user | |
|  | Trader | |
|  | Other | (please specify) |
|  |  |  |

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| 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. |

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| Yes **X** | No |
| Comments:  Stakeholders involvement was appropriate. Moreover, we appreciated ENTSOG decision to hold a further consultation on specific issues. We believe that, provided it is allowed by the project plan timeframe, such practice should be repeated also within the development process of other NCs. | |

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| 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). |

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

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| 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 ENTSOG’s aim to reflect the views of the majority of users during the development process. |

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| **Section** | 1-2: Rationale and Application | 3: Principles of co-operation | 4: Allocation of firm capacity[[1]](#footnote-1) | 5: Cross-border capacity |
| **Support** |  | **X** | **X** |  |
| **Do not support** | **X** |  |  | **X** |

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

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| Please provide brief reasoning for your responses, if you wish |
| * Rationale: As stated in previous consultations, Enel think that long term contracts shall keep an essential role in the gas market also in the future as they are fundamental for the system in terms of promotion of infrastructural investments and guarantee of security of supply. We believe that CAM can create obstacles to long term allocation, increasing the risk for operators contracting LT and delivering 2 consequent effects:   1. jeopardizing the very existence of future LT contracts putting at risk security of supply   2. favouring the direct entry of extra-UE producers in a European spot gas market, with negative effects not only on European operators but also on consumers, as producers could exploit a higher market power in a spot market than when contracting long term with larger importers. * Cross-border capacity: Enel does not favour the Sunset Clause. We believe that CAM should not affect existing contracts. The obligation to bundle capacity of existing contracts entails re-opening these contracts with obvious problems in terms of negotiation process and costs and also arising doubts in terms of its legal effectiveness (as correctly mentioned by Entso-G). |

1. Please consider article 4 except the day-ahead suggestion which is tackled already above. [↑](#footnote-ref-1)