

## 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**

First and Last Name: Christian Sidak

#### **Organisation**

Company/Organisation Name: EconGas GmbH

Job Title:

#### **Contact details**

Email: christian.sidak@econgas.com

Tel: +43 (0) 50205 8413

Mobile: +43 (0) 664 88456913

#### **Address**

Street: Ares Tower, Donau-City-Strasse 11

Postal Code: 1220

City: Vienna

Country: Austria

Countries in which your organisation operates: Austria, Germany, Hungary, Italy, Netherlands + Hubs

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 checked="" type="checkbox"/>	Other	Wholesale Supplier, Importer, Trader, Originator

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	No
<p>Comments: The process was very carefully planned from the start and taken the time pressure into account we think the overall process did set a positive benchmark for the coming network code development processes. We want to put a special spotlight on ENTSGs very good performance in regard to provision of information, working documents, stakeholder opinions, etc.</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
<p>If no, please give brief reasons and state how to consider this issue:</p> <p>If the goal of this network code is to facilitate hub-to-hub trading, especially in regard to day-ahead trading with firm day-ahead capacity, we oppose a shift of the auction timing to the afternoon. The trader has to know if the capacity he intends to use is available or not before being able to trade. Making a trade without knowing what the outcome of the DA capacity auction is (as it would be the case for the most of the day with afternoon auctions), bears an inherent risk for DA trading which naturally would more likely stifle an increase in trading activity and market liquidity and therefore also competition on natural gas markets itself.</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	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

In regard to the cross-border capacity section we still believe that a mandatory bundling is an unnecessary harsh measure and should only be used if voluntary bundling of capacities at interconnection points does not lead to the intended result. Additionally we strongly oppose any mandatory amendment of capacity contracts (Sunset Clause + Default Rule) as fundamental encroachment on the freedom of contract (private autonomy).

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