

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: The Netherlands, The UK

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 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 X	No
Comments: The process followed by ENTSG has been adequate and constructive. GasTerra highly appreciates ENTSG's open approach and the high level of stakeholder involvement. If economically viable, the webcasting of the stakeholder engagement sessions can be very convenient.	

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

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	Yes	Yes	Yes	
Do not support				Do not support

Section	6: Interruptible capacity	7: Tariffs	8: Booking platforms	9-11: Legal provisions
Support	Yes	Yes, noting article 2 para 5 of the NC CAM and emphasizing on the intermediary character of the tariff provisions in the NC CAM.	Yes	Yes
Do not support				

Please provide brief reasoning for your responses, if you wish

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

GasTerra cannot support Section 5 on Cross-border capacity of the CAM NC.

We encourage the introduction of bundled capacity products, but we strongly oppose to the prohibition of flange trading (following from the introduction of *mandatory* bundling of capacity). We therefore support ENTSOG's recommendation to delete Article 5.2. of the NC CAM (Amendment of existing Capacity Contracts) and we suggest amendments to Article 5.1. Bundled Capacity services in the sense that the latter does not apply to *all* firm capacity, but on a voluntary basis.

