

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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Organisation

Company/Organisation Name: **BDEW German Association of Energy and Water Industries**

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How would you describe your organisation?

<input checked="" type="checkbox"/>	Association	(please specify type): Energy and Water
<input type="checkbox"/>	End user	
<input 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 <input checked="" type="checkbox"/>	No
<p>Comments:</p> <p>The NC development process chosen by ENTSOG showed that it is possible to integrate a whole range of stakeholders in achieving a complex aim: developing pan-European binding rules. The proactive approach ENTSOG took should be an example to likewise processes on a national level and encourage TSOs to implement transparent and open ways to develop framework rules in such a way: all relevant documents were publicly available, the status of the process was always clear, ENTSOG was open for contact and input at any time, workshops could be followed by livestreams, the documentation of workshops was transparent. Every stakeholder could participate at any time and ENTSOG listened to majority as well as minority opinions. Listening to all stakeholders is crucial to balance the strong influence prime movers have on the NC.</p> <p>However BDEW likes to recommend that there is room for clarity on how ENTSOG deals, in a consistent manner, with the outcome of consultations, discussions and workshops. It should be backed up with a clear reporting mechanism that ensures that for each topic it is possible to find out how the stakeholders felt (anonymously, if</p>	

necessary) and when and why ENTSG decided to go with or against these views.

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

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

BDEW can support a DA auction in the afternoon, however, the longer the process takes and the later it starts the harder it is to procure the gas that shall be transported by the capacity as most of the trading activity (especially DA) will be over once the results are published. The whole process of bidding rounds and the publishing of the results should start earlier in the afternoon and/be (at least) shorter than the 90 minutes proposed. BDEW proposes a 30 min window.

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	X	X	X	
Do not support				X

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

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

For Section 4 BDEW proposes in addition Rolling Quarterly Auctions. It would complete the auction products and reduce uncertainties in the auction process as well as it would reduce additional costs for the shipper.

BDEW can not support Section 5 – as we stated before, BDEW is concerned about the obligation on bundled products and the sunset clause. BDEW does not support the default rule in the current form, because we do not see a satisfactory default solution.

With regard to 7, BDEW supports the proposals, but this is an interim position on proposals which are themselves interim. BDEW thinks that the final principles should be done on the Tarification Code.