



ENTSOG's view on Commission's CMP Guideline Proposal

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Market-based CMPs complementary to CAM supported by ENTSOG

« Whole package approach »

- Whole package of CAM NC and complementary, market-based CMPs will already lead to more available ST capacity
 - Auctioning of standardised products decreases probability of contractual congestion (CAM NC)
 - Minimum of 10% reservation for short term services ensures offer of capacity at least on intra-year basis (CAM NC)
 - Voluntary overbooking by TSOs will promote short-term market (CMP)
 - Enhanced secondary markets as a market-based instrument to free up underutilised capacity (CMP)

Additional intervening provisions unnecessary given those market-based instruments.

Necessity of intervening instruments questioned by ENTSOG

Issue of restricted renomination rights

- Side effects:
 - Higher costs for capacity to be acquired at short notice for provision of balancing energy (due to lack of flexibility)
 - Substantial change to firm capacity contracts leading to risk of cancelations in some member states
 - May create SoS issues for countries reliant on gas-fired PP
- Demand and benefit of firm day-ahead capacity unknown
- Implementation of instrument rather complex
- Interruptible day-ahead UIOLI as « last resort » sufficient and without described side-effects

ENTSOG suggests removal of provision from CMP guideline

Thank You for Your Attention

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