

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:

Germany, Poland, Italy, Czech Republic, Slovakia, Italy, Austria, Benelux, UK, Norway

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 type="checkbox"/>	Other	(please specify)

Question 1: Do you consider that the network code development process carried out by ENTSG 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
<p>Comments:</p> <p>In our view the development of the CAM network code was a very well example how a complex topic as the set up of a European wide set of guidelines for capacity allocation procedures can be developed allowing all stakeholders a maximum of involvement in the development process. The work was structured through various discussions and positioning papers as well as workshops so that all stakeholders had a chance to bring in their positions. The publication of results and decisions was very transparent since all documents were accessible through the ENTSG website although the specific way of the decision making process within ENTSG based on the many different views was not in every case traceable.</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: X	No
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The shifting of the day-ahead process to be held D-1 from 16:30 to 18:00 is welcomed by VNG. However we think that closing the auction at 6pm is too late to enable shippers to reasonably build up their business and positions on capacities obtained through these auctions as market activity shrinks during the late hours and most markets close by 18:00 hrs. Therefore we see a clear preference to have these auctions earlier in the afternoon as it is foreseen for example in the German system. Another option would be to shorten the auction 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

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

VNG does clearly not support the obligation for network users to bundle capacities and to introduce the sunset clause. Also the default rule is still not satisfactory. With our statement on this specific issue this position has already been communicated to ENTSG. From the discussions and workshops held on this issue I remember that most of the stakeholders did not support bundling of capacities and the introduction of the sunset clause as it is simply not feasible. Especially the legal issues are not solved which was proven by different working groups consisting of lawyer experts from various stakeholders of the energy industries. The reasons were clear and reproducible to all

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

parties involved. Therefore it's not clear to me why this rule is now part of the final paper that shall reflect broadly discussed and common positions of relevant stakeholders.

