**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.

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| First and Last Name: Claude MANGIN |

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| **Organisation** |
| Company/Organisation Name: GDF SUEZ |
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Countries in which your organisation operates: France, Belgium + 10 others countries

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| How would you describe your organisation? |

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| --- | --- | --- |
|  | Association | (please specify type) |
| **X** | End user | |
| **X** | Network user | |
| **X** | Trader | |
|  | Other | (please specify) |
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| 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. |

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| Yes **X** | No |
| Comments: GDF SUEZ would like to congratulate ENTSOG and especially the CAM NC team for this well organised process with fruitful and transparent debates.  Interactions with other network codes or guidelines have been quite poor, e.g. the discussion on reserve price has just be touch upon. It is then sometimes inconvenient to draft rules in the CAM NC without knowing the final features of others codes. | |

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| 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). |

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

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| 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 ENTSOG’s aim to reflect the views of the majority of users during the development process. |

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| --- | --- | --- | --- | --- |
| **Section** | 1-2: Rationale and Application | 3: Principles of co-operation | 4: Allocation of firm capacity[[1]](#footnote-1) | 5: Cross-border capacity |
| **Support** | **X** | **X** | **X** |  |
| **Do not support** |  |  |  | **X** |

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| **Section** | 6: Interruptible capacity | 7: Tariffs | 8: Booking platforms | 9-11: Legal provisions |
| **Support** | **X** | **X** | **X** | **X** |
| **Do not support** |  |  |  |  |

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| Please provide brief reasoning for your responses, if you wish |
| GDF SUEZ supports the CAM NC except §5.2. that should be removed. Indeed :   * the bundled products should be optional, both for existing and new contracts, i.e. not mandatory * and so, the sunset clause and the default rule should not be implemented.   Because :   * It is an non proportionate measure that imposes an excessive burden (renegotiation of capacity and commodity contracts) in relation to the “objective” (to increase market’s liquidity) * Shippers will be forced to pay for unwanted capacity. * The value of unbundled capacity in a mandatory bundled world seems to be zero.   GDF SUEZ is in particular pleased with the changes made about the “at least 10%” of the Technical capacity (and not available) that is already offered during the annual auctions (article 4.1.6) and the revenues equivalence principle expressed in 7.3. about the reserve prices. |

1. Please consider article 4 except the day-ahead suggestion which is tackled already above. [↑](#footnote-ref-1)