

Via Electronic Mail

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EFET Response to the Public Consultation on the Implementation of CAM and CMP on the BBL interconnector

The European Federation of Energy Traders (EFET¹) welcomes the opportunity to respond to the above consultation.

Do you agree that the proposals are compliant with the Network Code on CAM?

Yes, we agree that the proposals for the implementation of CAM on the BBL pipeline, as set out in the concept document, are compliant with Regulation 984/2013.

Do you agree that the proposals are compliant with the CMP Annex?

Yes, we agree that the proposals for CMP, as set out in the concept document, are compliant with Annex 1 of Regulation 715/2009, provided that a future long-term use-it-or-lose-it mechanism will allow for the lack of trading opportunities as a justification for not using capacity, contrary to section 3.6 of the vision paper LT UIOLI by the ACM, Ofgem, and CREG.

Do you agree that the quantity of capacity to be set aside for short term auctions defined in section 2.3 is appropriate?

The concept document proposes that 20% of available capacity that is subject to the CAM regulations should be set aside for the Quarterly and Short term auctions. This is in line with the procedure in CAM.

Do you support single-sided nominations being accepted for unbundled capacity if the same entity owns the capacity on both sides?

¹ The European Federation of Energy Traders (EFET) promotes and facilitates European energy trading in open, transparent, sustainable and liquid wholesale markets, unhindered by national borders or other undue obstacles. We currently represent more than 100 energy trading companies, active in over 27 European countries. For more information, visit our website at www.efet.org.

Yes, we support single-sided nominations being accepted for unbundled capacity if the same entity owns the capacity on both sides of the IP.

Do you agree that surrendered capacity that is not reallocated in an auction is not automatically rolled forward to future auctions?

We agree that Shippers should be able to take back surrendered capacity if the capacity has not been sold in the auctions, i.e. prior to each auction, shippers would need to confirm that they still wish to surrender capacity which they had previously surrendered, but which had not been sold in the auctions.

Do you have any other feedback on the Concept Document?

Due to temperature differences shippers currently have to nominate slightly more exit from BBL. We would like to have a guarantee from BBL and National Grid Gas (NGG) that temperature differences on NGG will not lead to a mismatch of capacity entered into BBL from GTS and exited from BBL to NGG.

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