

22th October 2012, Warsaw

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Ref: *Forward Risk-Hedging Products and Harmonisation of Long-Term Capacity Allocation Rules*

Dear Sir or Madam,

Please find below (annex 1) our comments to document “*Forward Risk-Hedging Products and Harmonisation of Long-Term Capacity Allocation Rules*”. I would like to thank you for having possibility to express our opinion about the document. In case of any questions please do not hesitate to contact us.

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Yours faithfully,

Dawid Klimczak

## Annex 1 – Comments

### Question no 7.

At the moment we have various organizations which organize long-term auctions e.g. CAO, CASC. There should be one electronic platform for the all European borders. It will be helpful

- a) for market participants
- b) for ACER to monitor the market.

Same products should be available for all borders. In our opinion auctions which are organized for borders between EU countries and NON –EU countries should be organized at this platform. For example today long-term capacity auction between Poland-Ukraine border is organized by polish TSO PSE-Operator, not by Central Allocation Office. Probably the same problem do exist on different borders (eg. Hungary-Ukraine)

To summarize, one capacity auction platform for Europe.

### Question no 13.

Long-term tradeable products in continental Europe are: yearly, quarterly, monthly. For a proper portfolio management, markets participants should reflect the same products for capacity allocation.

### Question no 17.

For a better use of capacity rights there should exists possibility to sell them at auction platform at secondary market. Exchange for secondary capacity should be created at single eu capacity platform.

Question no 22.

Single auction platform is fundamental issue to ensure lower-risk for long-term capacity hedging. The deadline for EU single platform should be end of 2014. The platform should be created by European TSO.