

**Sent:** Monday, May 12, 2014 3:49 PM  
**To:** consultation2014G03  
**Subject:** ACER Public Consultation Rules For Trading

Dear Sirs,

*Regarding the Public Consultation launched by ACER about Rules For Trading, Preliminary scoping document for public consultation on potential “FG rules for trading related to technical and operational provisions of network access services and system balancing (FG RfT)”, Gas Natural Distribución (Spanish DSO) would state the following:*

*We believe there is no need for binding EU rules on this topics, since there are existing Network Codes regarding these issues, as Capacity Allocation Mechanisms (CAM; Commission Regulation (EU) No 984/2013) or Balancing (BAL; Commission Regulation (EU) No 312/2014), or future Network Codes as the one referred to Interoperability. These rules are sufficient to regulate aspects of the topics covered in the consultation.*

*Specifically, with respect to questions 9 and 13 we would like to state the following:*

*Q9: If interruptible capacity is not required by technical limitations or congestion, it is better not to exist because it implies a flexibility that is associated with a discount and that means less revenue and possible generation of deficit or cross-market economies.*

*Q13: Given that balance codes still to be implemented in the framework of each State Member, it does not seems reasonable to develop more harmonized rules until the markets start operating and checking if more rules are necessary.*

*In any case, if any regulatory developments on these issues, it is necessary to have the opinion and collaboration of all actors that can be directly or indirectly involved. In this sense, the DSOs have much to contribute to ensure the overall system performance, as they are the operators of the networks that are directly connected to transmission networks.*

*Best regards,*

**Contact details:**

Company name: **Gas Natural Distribución sdg S.A.**

Type of organisation (e.g. TSO, gas trader, gas supplier, power plant, etc.): **DSO**

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