

GDF SUEZ Infrastructures contribution to ACER Consultation “Preliminary scoping on potential Framework Guidelines on Rules for Trading”

Rather than answering the whole questionnaire of the consultation, we would like to emphasize a more general view on this issue. Several Network Codes have been developed so far, with intensive involvement of stakeholders (CAM, CMP, balancing and interoperability). Apart from the rules on CMP, partially implemented in October 2013, the implementation of other Network Codes has just started or will begin soon. We consider that the existing Network Codes or the Network Codes under development should first be implemented.

Indeed, the existing Network Codes, as well as the Network Codes currently under development, will lead to substantial changes for the entire gas market :

- We start to implement new capacity allocation and congestion management procedures ;
- Balancing will define new responsibilities to network users, will change the flexibility market, and will contribute to the development of short term markets ;
- Interoperability will harmonize the way of communication between transmission systems and will contribute to market integration ;
- And we are currently discussing on how to harmonize tariff structures.

Developing New Framework Guidelines on Rules for trading before the adoption and full implementation of the Network Codes seems premature. Before introducing new rules, the results of ACER’s monitoring task on implementing the existing Network Codes should be evaluated and consulted with stakeholders. This should be the starting point of a scoping discussion regarding Framework Guidelines on Trading Rules. In any case, for the time being, it is by far too early to start scoping new Framework Guidelines. This is in line with the conclusion of the ad-hoc ACER expert group according to which there are no grounds so far to justify the elaboration of the Framework Guidelines on rules for trading.

Then, in our opinion, there is no necessity to adapt the rules for the time being.

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