



Public Consultation on the Incremental Capacity Proposal and further NC CAM amendments

Enagás comments

31st August 2015



Company: Enagás

Type of stakeholder: TSO

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Q1: Do you support the changes suggested by the Agency on Incremental Capacity (new chapter IVa and related articles)? If not, please list which new or amended articles you disagree with and explain why.

Partially. Enagás would like to propose the following changes:

- **Article 20a:**

To avoid confusion and for consistency reasons with the text in the article, the title of the article should be modified to "*market demand assessment*", instead of "*demand assessment*".

- **Article 20a(2):**

Enagás agrees that joint market demand assessments of neighbouring TSOs are a more efficient way of identifying demand for incremental capacity between entry-exit systems. What should be taken into account is that in case more than one TSO is active in one entry-exit system, it does not necessarily make sense to involve all TSOs of that entry-exit system in the demand assessment process. Only those TSOs within an entry-exit system that are actually bordering to the respective other entry-exit-system should be involved in the demand assessment. For this reason, the article should be rewording as follows:

"2. No later than 8 weeks after the start of the annual yearly capacity auction in even-numbered years, the transmission system operators active on an entry-exit system border shall in particular co-operate to produce the market demand assessment report. Such a report shall at least cover both sides of the border between the two entry-exit systems concerned."

- **Article 20b(5):**

With regards to point (d) in the list, Enagás would like to highlight that the definition of economic test parameters, such as the assessment of future tariffs, revenues and 'f-factor', is a task clearly falling under NRAs responsibility. In particular in those systems where the party responsible for setting tariffs or the methodology is the NRA and the TSO is not involved in this process.

Enagás proposes to delete this point to keep consistency with Article 39(2) of the TAR NC re-submitted to ACER on 31 July 2015.

Q2: Do you support ENTSOG's envisaged proposals to change the default auction calendar in relation to the discussions on the draft Network Code on Tariffs (i.e. to move the annual yearly capacity auctions from March to

July, the annual quarterly auctions from June to August and the rolling monthly auctions' start from the third to the second Monday of each month)? If not, please explain why.

Yes.

Q3: Do you support the further technical changes introduced (e.g. on the auction algorithms (Art. 17 (16) and Art. 18 (3d) & (9)); on the bundling of existing capacity (Art. 20(1); on the allocation of interruptible services (Art. 21(9)) etc.? If not, please list which amended articles you disagree with and explain why.

Partially. Enagás would like to make the following clarification about the allocation of interruptible services.

- **Article 21(9):**

On article 21.9 a period of one week to notify network users about the amount of interruptible capacity to be offered is established. It should be noted that in some systems the offering of interruptible capacity only occurs when all the firm capacity has been allocated. But, if the corresponding firm capacity auction has not closed on the scheduled start day for the interruptible capacity, it is not possible to notify network users the amount of interruptible capacity to be offered one week in advance as the interruptible auction may not be carried out. Thus, Enagás would like to add the following sentence at the end of the Art. 21 paragraph 9:

"If not possible to notify network users about the interruptible capacity to be offered one week before the auction starts. The publication will be done no later than the next business day after the closing of the respective firm auctions."

Q4: Do you have any other comments related to the proposed NC CAM, changes, and if so which?

No.