

Warsaw, 27 June 2018

KL/232/DK/2018

EC Register Number: 22858051466-12

**Concerns:** PC\_2018\_G\_03 - public consultation as part of Agency decision making process for the selection of single capacity booking platform(s) at 'Mallnow' and 'GCP VIP' (Article 37(3) CAM NC)

**Respondent information**

Polish Confederation Lewiatan  
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00-727 Warsaw, Poland



**Dear Sirs,**

Polish Confederation Lewiatan (hereinafter as "Lewiatan"), one of the biggest representation of employers in Poland, supports all initiatives aiming at ensuring more competition, equal treatment and transparency on the European market. Not being a gas trader itself, but having active gas trading companies among our members, we would like to take this opportunity to contribute to public consultation conducted by ACER as part of the decision making process for the selection of single capacity booking platforms at the Polish – German border.

As an entrepreneurs' organisation, Lewiatan always draws its interest to the solutions impacting situation on the market. We strongly believe that there is a need to support competitiveness on each market. Thus, we would like to underline how important for the market of capacity allocation platforms and in broader perspective, for the gas market it is to ensure functioning of multiple solutions which create possibility of choice of best-fitted and optimal solutions for market participants. At the end, market users bear the costs of platform functioning. To give the right





stimulation for market users to choose between platforms, they should be functioning based on the standard solutions. Implementation of standard solutions on the platforms would facilitate the competition on the market through enabling market users to choose basing on their preferences without need to bear any additional costs.

On top of that, the regulation of the platform providers shall enable its users to change the platform (service provider). Only these two criteria fulfilled simultaneously, ensure that there will be no lock-in effect hampering competition.

Please note that we agree to have our contribution published on the internet.

Best regards,

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