

## Responses to CAM Network Code – second formal consultation on new or modified concepts

### *Consultation Response Sheet*

Please complete the fields below and send via email using the subject title, “Response to the CAM NC consultation” to [info@entsog.eu](mailto:info@entsog.eu) by 14 November 2011.

Name
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Countries in which your organisation operates: Storengy is present in 4 countries: France, Germany, UK and Spain.

How would you describe your organisation?

<input type="checkbox"/>	Association (please specify type)
<input type="checkbox"/>	End user
<input type="checkbox"/>	Network user
<input type="checkbox"/>	Trader
<input checked="" type="checkbox"/>	Other (please specify) : storage system operator

In the questions below, ENTSG would be grateful if respondents could clearly indicate their preferred option and provide a brief but **fully reasoned justification** for their choice. This applies equally whether you agree or disagree with any ENTSG proposal as it is important that ENTSG is able to extract the clear views of all respondents. If you do not respond to a question, ENTSG will assume that you have no view on this issue.

**Question 1 (Standard Capacity Products to be auctioned): which option do you prefer, and why?**

<input type="checkbox"/>	Option 1: Quarterly only
<input checked="" type="checkbox"/>	Option 2: Integration of yearly product (Post consultation proposal)

Please justify your choice. ENTSG would particularly welcome any views on why the alternatives to your preferred option may not be technically feasible.

As already stated during the first consultation, Storengy is in favour of the integration of yearly products in the CAM Network Code. We believe that integrating yearly product would allow to take into account the seasonal nature of storage use (injection in summer / withdrawal in winter), which determines, in turn, the physical performance of storage facilities.

As argued in our first response, maintaining quarterly auctions as the sole option for long-term products may prove prejudicial to storage use which is linked with the availability and price of transmission capacity. The already evoked problem of capacity “gaps” in the option of quarterly products may impact on the use of storage facilities and the perceived value of storage. Needless to

say, it may have negative effects on security of supply.

Moreover, we note in the consultation document that Option 2 contains two types of long term products, i.e. annual and quarterly. Should the two kinds of long-term products be retained, the offering of quarterly long-term services should not be prejudicial to the offering of the annual product.

Having said the above, Storengy maintains its previously expressed position that yearly products should be integrated in the Network Code.

**Question 2 (Start date for yearly product): which option do you prefer, and why?**

- |                                     |  |
|-------------------------------------|--|
| <input type="checkbox"/>            | Option 1: Yearly product starts on 1 <sup>st</sup> January |
| <input checked="" type="checkbox"/> | Option 2: Yearly product starts on 1 <sup>st</sup> October |

Please justify your choice. ENTSG would particularly welcome any views on why the alternatives to your preferred option may not be technically feasible.

Whereas Storengy prefers Option 2 over Option 1, we believe that yearly products should ideally start on 1<sup>st</sup> April, rather than on 1<sup>st</sup> October or 1<sup>st</sup> January. The start date in April would be more coherent with the seasonal character of storage.

**Question 3 (Auction algorithms: overall methodology): which option do you prefer, and why?**

No answer.

- |                          |  |
|--------------------------|--|
| <input type="checkbox"/> | Option 1: Multiple round ascending clock auction |
| <input type="checkbox"/> | Option 2: Single round volume based auction      |

Please justify your choice. ENTSG would particularly welcome any views on why the alternatives to your preferred option may not be technically feasible.

**Question 4 (Limitation of price steps): which option do you prefer, and why?**

No answer.

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Option 1: Do not limit number of price steps (Post consultation proposal)

Option 2: Limit number of price steps

Please justify your choice. ENTSG would particularly welcome any views on why the alternatives to your preferred option may not be technically feasible.

**Question 5** (Minimisation of unsold capacity): which option do you prefer, and why?

No answer.

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Option 1: Minimise unsold capacity (Post consultation proposal)

Option 2: Draft CAM NC proposal

Please justify your choice. ENTSG would particularly welcome any views on why the alternatives to your preferred option may not be technically feasible.

**Question 6** (Sunset clause: choice of default rule): which option do you prefer, and why?

No answer.

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Option 1: Maximum default rule with cap at technical capacity

Option 2: "Partially unbundled" default rule

Please justify your choice. ENTSG would particularly welcome any views on why the alternatives to your preferred option may not be technically feasible.

**Question 7** (Sunset clause: further questions): Please provide any views, information or evidence in relation to the further questions raised by ENTSG in section F.2 regarding the sunset clause.

No answer.



**Question 8** (Tariffs: split of auction premium from bundled products): which option do you prefer, and why?

No answer.

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Option 1: Keep split of auction premium proportional to reserve prices as default (Post consultation proposal)

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Option 2: Split of auction premium into equal shares as default

Please justify your choice. ENTSG would particularly welcome any views on why the alternatives to your preferred option may not be technically feasible.