

German Association of Energy and Water Industries (BDEW)
Reinhardtstraße 32 · 10117 Berlin · Germany

ACER Agency for the Cooperation of Energy
Regulators
Trg republike 3
1000 LJUBLJANA
SLOWENIEN

Scoping the potential for Gas Framework Guidelines on Rules for Trading

Dear Sir or Madam,

BDEW would like to thank ACER for the opportunity to participate in the consultation on scoping the potential for FG on Rules for Trading.

As the preliminary scoping exercise aims to give an answer whether there is a need to formulate rules – either binding or voluntary - in the area of capacity trading, BDEW would like to comment on one special topic.

In the absence of detailed information of what issues are at stake in a possible Trading Code or what problems it would seek to address, BDEW finds it difficult to frame detailed comments at this stage. Therefore, BDEW questions the need for yet another framework guideline (at least until the current NCs are implemented). Nevertheless, some of the topics addressed in the Scoping document present obstacles or will likely be addressed with the implementation of the different NCs. In this case however, the issues identified appear to fall within the scope of existing FG/NCs, and so, if necessary, could be better resolved by amending the existing texts.

In any case, any new Code would have to be complementary and consistent with existing provisions.

Kind regards,



Katharina Stecker
Unit Manger Energy Trading



Marcel Steinbach
Head of Energy Trading

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KS

Katharina Stecker
Energy Trading
phone +49 30 300199-1562
fax +49 30 300199-3562
Katharina.stecker@bdew.de
www.bdew.de

Marcel Steinbach
Energy Trading
phone +49 30 300199-1550
fax +49 30 300199-3562
marcel.steinbach@bdew.de
www.bdew.de

**German Association of Energy
and Water Industries (BDEW)**
Reinhardtstraße 32
10117 Berlin · Germany

General Executive Manager
Hildegard Müller (Chair)
Roger Kohlmann
Dr.-Ing. Anke Tuschek
Martin Weyand

VAT Reg. No.: DE 814902527
Charlottenburg local court
Associations' Registry 26587 B

BDEW Representation to the EU
Avenue de Cortenbergh 52
B-1000 Brussels
Belgium

Banking details
Berliner Volksbank
IBAN: DE80 1009 0000 8848 0410 00
BIC: BEVODEBB