



**ACER's public consultation**  
**on the Incremental Capacity Proposal and further NC CAM amendments**  
PC\_2015\_G\_05

**Position of the Polish Oil and Gas Company**

With regard to the ACER's public consultation on ***the Incremental Capacity Proposal and further NC CAM amendments***, PGNiG would like to answer the questions asked:

1. 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.

We support the suggested amendments on new capacity. In our opinion a systematic and regular assessment of market demand for new capacity in the EU would contribute to the improvement of the speed and effectiveness of operators' response to the needs of network users.

2. 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.

We support the proposals to change the default auction calendar.

Moreover, we propose adding a new kind of auction i.e. the quarterly auctions for a quarterly product held about two months prior to each quarter.

Moving the annual yearly product auction from March to July brings the auctions for these products closer to the period when gas supply contracts covering the next year are traded in the greatest extent. A user in that moment has a better knowledge of the situation on the market and can make the best decisions under his strategy of buying the transmission capacity.

Similarly, the quarterly auctions for a quarterly product should be held directly prior to each quarter, in the period when gas supply contracts for the respective quarters are traded.

In terms of the rolling monthly capacity auctions we believe that they should take place as so far, i.e. on the third Monday of a month preceding the month for which capacity is allocated. Keeping the existing term of auctions for monthly product will allow shippers to better fit the capacity purchasing portfolio to their strategy covering gas demand in each month. The decision to purchase monthly product depends on the current gas market situation and is taken at the last moment.

3. 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.

We support the proposed amendments.

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

We have no further comments.