Public consultation on the Capacity Allocation Mechanisms Network Code: achievements and the way forward

Fields marked with * are mandatory.

A Introduction

With gas markets being impacted by a global pandemic (2020) and a European energy crisis (2022), the resilience of the current market rules (also known as “network codes”) has been tested. Although they have ensured a proper market functioning (see ACER’s Market Monitoring Reports and Congestion Reports), lessons have yet to be learnt to further enhance market resilience.

The European gas market must also be ready to align with the latest policy and technological developments, guaranteeing the Green Deal’s decarbonisation targets can be met.

Against this background, the latest European Gas Regulatory Forum has emphasised the importance of having gas market rules which can adequately reflect this evolution, and therefore prompted for the revision of the capacity allocation mechanisms network code (CAM NC).

As part of ACER’s review of the Network Code for Capacity Allocation Mechanisms (‘CAM NC’), ACER is assessing the achievements of CAM NC and scoping the areas of improvement.

ACER invites stakeholders to actively participate in its review by providing feedback on the scoping of the areas of improvement as well as making reasoned proposals on further areas of improvements that could be considered for eventually amending the CAM NC.

The ACER CAM NC scoping document (‘scoping document’) contains ACER’s review of the market rules regulating gas transmission capacity allocation in Europe and proposes a scoping of areas of improvements based on ACER’s work on CAM. It serves as the main consultation document to which the questions in this survey refer.

Please send your response to the questions by 5 January 2024, 12:00 noon (CET).

We invite stakeholders to bring forward concrete and succinct reasonings. Overly lengthy responses may not be processed.

The survey was corrected on 17 November for missing questions.

The stakeholder responses will be published on the Agency’s website. If you include commercially sensitive information in your reply, please mark the parts of your answer that are confidential as well as provide a non-confidential version for publication purposes.
Please confirm that you have read the Data Protection Notice

B General information

1 Name and Surname:

2 Email

3 Company:

GSA Platform

4 Country:

- AT - Austria
- BE - Belgium
- BG - Bulgaria
- HR - Croatia
- CY - Cyprus
- CZ - Czechia
- DK - Denmark
- EE - Estonia
- FI - Finland
- FR - France
- DE - Germany
- EL - Greece
- HU - Hungary
- IE - Ireland
- IT - Italy
- LV - Latvia
- LT - Lithuania
- LU - Luxembourg
- MT - Malta
- NL - Netherlands
- PL - Poland
- PT - Portugal
- RO - Romania
- SK - Slovak Republic
- SI - Slovenia
- ES - Spain
- SE - Sweden
C Consultation documents

Download ACER’s Scoping document

Download the cover note to the scoping document

The following questions are organised per chapter and article of the CAM NC, first depicting ACER’s review included in the scoping document, a question on how you assess the need for a change in the article, and a question inviting you to elaborate your answer with specific elements.

D CAM NC Preamble

<table>
<thead>
<tr>
<th>Policy paper reference</th>
<th>Nature of proposal in the policy paper</th>
<th>Area of improvement</th>
</tr>
</thead>
<tbody>
<tr>
<td>ACER Special Report on addressing congestion in North-West European gas markets</td>
<td>• To maximise technical capacity as well as (bundled) firm capacity (cf. p. 15-17)</td>
<td>yes</td>
</tr>
<tr>
<td></td>
<td>• A further strengthening of coordination between neighbouring system operators and regulatory authorities is needed, for instance, by harmonising calculation methodologies (cf. p. 16)</td>
<td></td>
</tr>
<tr>
<td>N/A</td>
<td>Clear recital or New article on CAM principles</td>
<td>yes</td>
</tr>
<tr>
<td></td>
<td>• The core principles of capacity allocation mechanism must be explicitly defined in the NC. Allocation capacity mechanisms must guarantee the well-functioning of the internal market (GTI, guarantee the gas flows, not bottlenecks, bundled offer, cascading principle, market-based allocation, etc.).</td>
<td></td>
</tr>
</tbody>
</table>
8 Do you agree with ACER's review of the CAM NC Preamble and the identified area(s) of improvement (yes=amendment identified, maybe= amendment may improve market, no=no change envisioned)?

An amendment may further improve the market functioning and better capacity allocation

- Strongly agree
- Agree
- Neutral
- Disagree
- Strongly disagree

9 Please elaborate on why do you agree or disagree with ACER's review, being specific about which elements you agree or disagree with? Are there further improvements that you consider relevant in this area in addition to the ones raised by ACER in the scoping document; please explain your reasoning?

For above question option “neutral” has been selected. Issue is not directly relevant and/or affecting the auctioning platform.

E CAM NC, Chapter I,
General provisions (Articles 1-3)

CAM NC
Article 1 – Subject matter

<table>
<thead>
<tr>
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<tr>
<td></td>
<td></td>
<td>no</td>
</tr>
</tbody>
</table>

10 Do you agree with ACER's review of this CAM NC article and the identified area(s) of improvement (yes=amendment identified, maybe= amendment may improve market, no=no change envisioned)?

An amendment may further improve the market functioning and better capacity allocation

- Strongly agree
- Agree
- Neutral
- Disagree
- Strongly disagree

*
11 Please elaborate on why do you agree or disagree with ACER's review, being specific about which elements you agree or disagree with? Are there further improvements that you consider relevant in this area in addition to the ones raised by ACER in the scoping document; please explain your reasoning?

For above question option “neutral” has been selected. Issue is not directly relevant and/or affecting the auctioning platform.

**CAM NC**  
**Article 2 – Scope**

<table>
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</table>
| N/A                    | “When implicit allocation methods are applied, NRAs may decide not to apply article 8 to 37.” (Article 50 of CAM NC)  
• Make sure mechanisms of implicit allocation (IA) are consistent with the key principles of the CAM NC. In particular, the principle of capacity bundling;  
• To avoid distortions in the functioning of the Internal Market, CNMC considers that all capacity allocation mechanisms must respect the core principles of CAM. Consequently, the CAM NC should be revised article by article (in particular, art.8 to art.37) to analyse the consequences of not applying those articles when implicit allocation is in place.  
• Coordination when deciding and bundling as two key principles also for IA.  
(CAM TP) | yes |

**12** Do you agree with ACER’s review of this CAM NC article and the identified area(s) of improvement (yes=amendment identified, maybe= amendment may improve market, no=no change envisioned)?

- [ ] Strongly agree
- [ ] Agree
- [ ] Neutral
- [ ] Disagree
- [ ] Strongly disagree

An amendment may further improve the market functioning and better capacity allocation.

**13** Please elaborate on why do you agree or disagree with ACER's review, being specific about which elements you agree or disagree with? Are there further improvements that you consider relevant in this area in addition to the ones raised by ACER in the scoping document; please explain your reasoning?

For above question option “neutral” has been selected. Issue is not directly relevant and/or affecting the auctioning platform.
**CAM NC**

**Article 3 – Definitions* (1/2)**

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| ACER Special Report on addressing congestion in North-West European gas markets | • "Introduce the concept of 'technical capacity', which refers to the (non-static) maximum-flow capacity at a (virtual) interconnection point considering the networks that is optimised for a most likely flow scenario, as opposed to 'firm technical capacity', which is the capacity that can be guaranteed in all flow scenarios. Both indicators shall be reported and updated by TSOs regularly" (p. 17)  
  
  • Time elements to be considered in these dynamic definitions; (CAM TF) | yes*                                                                                                  |
| FUNC 01/2020 “Greater Reliability to book firm capacity at IPs” - Issue Solution and Issue Solutions Supporting Note | • Realign auction calendar dates to span July-June                                                   | yes                 |

* Alignment with definitions provided by hydrogen and decarbonised gas markets package

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**CAM NC**

**Article 3 – Definitions* (2/2)**

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<th>Policy paper reference</th>
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| N/A                    | Review definition of implicit allocation (alignment with the key principles, in particular bundling) (CAM TF)  
  
  • ‘Implicit allocation method’ means a capacity allocation method where, possibly by means of an auction, both transmission capacity > on both sides of the border and a corresponding quantity of gas are allocated at the same time;" (Article 3(6) of CAM NC, with textual clarification) | yes                 |

* Alignment with definitions provided by hydrogen and decarbonised gas markets package

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14 Do you agree with ACER’s review of this CAM NC article and the identified area(s) of improvement (yes=amendment identified, maybe= amendment may improve market, no=no change envisioned)?

An amendment may further improve the market functioning and better capacity allocation

- Strongly agree
- Agree
- Neutral
- Disagree
- Strongly disagree

15 Please elaborate on why do you agree or disagree with ACER’s review, being specific about which elements you agree or disagree with? Are there further improvements that you consider relevant in this area in addition to the ones raised by ACER in the scoping document; please explain your reasoning?
16 Do you agree with ACER's review of this CAM NC article and the identified area(s) of improvement (yes=amendment identified, maybe=amendment may improve market, no=no change envisioned)?

- Strongly agree
- Agree
- Neutral
- Disagree
- Strongly disagree

17 Please elaborate on why do you agree or disagree with ACER's review, being specific about which elements you agree or disagree with? Are there further improvements that you consider relevant in this area in addition to the ones raised by ACER in the scoping document; please explain your reasoning?

For above question option “neutral” has been selected. Issue is not directly relevant and/or affecting the auctioning platform.
* 18 Do you agree with ACER's review of this CAM NC article and the identified area(s) of improvement (yes=amendment identified, maybe= amendment may improve market, no=no change envisioned)?

An amendment may further improve the market functioning and better capacity allocation

- Strongly agree
- Agree
- Neutral
- Disagree
- Strongly disagree

* 19 Please elaborate on why do you agree or disagree with ACER's review, being specific about which elements you agree or disagree with? Are there further improvements that you consider relevant in this area in addition to the ones raised by ACER in the scoping document; please explain your reasoning?

For above question option “neutral” has been selected. Issue is not directly relevant and/or affecting the auctioning platform.
Do you agree with ACER's review of this CAM NC article and the identified area(s) of improvement (yes=amendment identified, maybe= amendment may improve market, no=no change envisioned)?

An amendment may further improve the market functioning and better capacity allocation:

- Strongly agree
- Agree
- Neutral
- Disagree
- Strongly disagree

Please elaborate on why do you agree or disagree with ACER's review, being specific about which elements you agree or disagree with? Are there further improvements that you consider relevant in this area in addition to the ones raised by ACER in the scoping document; please explain your reasoning?
Do you agree with ACER's review of this CAM NC article and the identified area(s) of improvement (yes=amendment identified, maybe= amendment may improve market, no=no change envisioned)?

- Strongly agree
- Agree
- Neutral
- Disagree
- Strongly disagree

Please elaborate on why do you agree or disagree with ACER's review, being specific about which elements you agree or disagree with? Are there further improvements that you consider relevant in this area in addition to the ones raised by ACER in the scoping document; please explain your reasoning?

For above question option “neutral” has been selected. Issue is not directly relevant and/or affecting the auctioning platform.

G CAM NC, Chapter III
Allocation of firm capacity products (Articles 8-18)
24 Do you agree with ACER’s review of this CAM NC article and the identified area(s) of improvement (yes=amendment identified, maybe= amendment may improve market, no=no change envisioned)?

An amendment may further improve the market functioning and better capacity allocation

- Strongly agree
- Agree
- Neutral
- Disagree
- Strongly disagree

25 Please elaborate on why do you agree or disagree with ACER’s review, being specific about which elements you agree or disagree with? Are there further improvements that you consider relevant in this area in addition to the ones raised by ACER in the scoping document; please explain your reasoning?
For above question option “neutral” has been selected. Issue is not directly relevant and/or affecting the auctioning platform.

26 Do you agree with ACER’s review of this CAM NC article and the identified area(s) of improvement (yes=amendment identified, maybe= amendment may improve market, no=no change envisioned)?

An amendment may further improve the market functioning and better capacity allocation

- Strongly agree
- Agree
- Neutral
- Disagree
- Strongly disagree

27 Please elaborate on why do you agree or disagree with ACER’s review, being specific about which elements you agree or disagree with? Are there further improvements that you consider relevant in this area in addition to the ones raised by ACER in the scoping document; please explain your reasoning?

Implementation of advanced booking of day-ahead product would require significant changes to booking platforms as well as TSOs’ IT systems.
The implementation process for such changes requires time (estimated 2 years for the GSA Platform), cost as well as efforts to present the proposed changes to the market. Further cost-benefit and technical analyses are required to assess the added value of introducing Balance of the Month product or advanced day-ahead booking opportunities.
### CAM NC

**Article 10 – Applied capacity unit**

<table>
<thead>
<tr>
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<td>/</td>
<td>no</td>
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</tbody>
</table>

*28 Do you agree with ACER's review of this CAM NC article and the identified area(s) of improvement (yes=amendment identified, maybe= amendment may improve market, no=no change envisioned)?*

- [ ] Strongly agree
- [ ] Agree
- [ ] Neutral
- [ ] Disagree
- [ ] Strongly disagree

An amendment may further improve the market functioning and better capacity allocation.

*29 Please elaborate on why do you agree or disagree with ACER's review, being specific about which elements you agree or disagree with? Are there further improvements that you consider relevant in this area in addition to the ones raised by ACER in the scoping document; please explain your reasoning?*

The capacity unit is set correctly.
30. Do you agree with ACER’s review of this CAM NC article and the identified area(s) of improvement (yes=amendment identified, maybe= amendment may improve market, no=no change envisioned)?

An amendment may further improve the market functioning and better capacity allocation

- Strongly agree
- Agree
- Neutral
- Disagree
- Strongly disagree

31. Please elaborate on why do you agree or disagree with ACER’s review, being specific about which elements you agree or disagree with? Are there further improvements that you consider relevant in this area in addition to the ones raised by ACER in the scoping document; please explain your reasoning?

GSA Platform is of the opinion that too many auctions and difficult rules of auctioning may burden the capacity allocation process. In our opinion not all participants are aware of the complexity of the rules and how it can change the trading arrangements. Secondly, too many booking opportunities and the relations between them could lead to market manipulation.

The cost-benefit analysis is required to assess the real added value of the enormous changes to booking platforms and TSOs’ IT systems.

The reduction of physical bottlenecks could be solved rather by the development of transmission network than development of IT booking systems.

Impacted stakeholders (ACER, booking platforms, market participants, TSOs) should know reasonably long in advance the expected changes to adapt to changes.

It shall be analysed if implementation of a new, complicated system with so many auctions for the same product will lead to increase of capacity sale by the TSOs in comparison to the currently applied methods.

From the Issue Solution and Issue Solution Supporting Note we identified the 3 ways of conducting auctioning of yearly, quarterly and monthly auctions:
1. ACA auction for yearly, quarterly and monthly firm capacities (without additional UPA auctions) – the current NC CAM solution (no changes to NC CAM);
2. Additional booking opportunities: any firm Y, firm Q and firm M capacities will be auctioned in subsequent UPA auctions after ACA auctions have been finished;
3. Additional booking opportunities: any firm Y, firm Q and firm M capacities will be auctioned in subsequent UPA auctions after ACA auctions have been terminated. The forced termination is done in time in advance to organize UPA auctions.

Regarding the minimum prices of additional UPA auctions applicable for point 2 and point 3 above there are 2 variants:
a. UPA minimum price is equal to the last price from corresponding ACA auction;
b. UPA minimum price is equal to the tariff reserve price.

Considering the efficiency and simplicity, the first solution is optimal in GSA Platform opinion. If it appears that the market is interested in implementing of solution in point 2 or point 3 and willing to pay for them, further cost-benefit and technical analysis is required. All proposed changes to be implemented require a significant commitment of time and cost. The implementation process for such changes also requires time (2 years) and efforts to present the proposed changes to the market.

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<tbody>
<tr>
<td>FUNC 01/2020 “Greater flexibility to book firm capacity at IPs” - Issue Solution and Issue Solutions Supporting Note</td>
<td>Additional booking opportunities • Any Q firm capacity available after ACAs will be auctioned in subsequent UPAAs; • Proposed regularity: weekly, on Thursdays (subject to change according to flexibility proposals) • Once proposed via UPA, a product can no longer be proposed via ACA again (ACER and ENTSOG have diverging views on the implementation)</td>
<td>yes</td>
</tr>
</tbody>
</table>

*32 Do you agree with ACER’s review of this CAM NC article and the identified area(s) of improvement (yes=amendment identified, maybe= amendment may improve market, no=no change envisioned)?

- [ ] Strongly agree
- [ ] Agree
- [ ] Neutral
- [ ] Disagree
- [ ] Strongly disagree

*33 Please elaborate on why do you agree or disagree with ACER’s review, being specific about which elements you agree or disagree with? Are there further improvements that you consider relevant in this area in addition to the ones raised by ACER in the scoping document; please explain your reasoning?
GSA Platform is of the opinion that too many auctions and difficult rules of auctioning may burden the capacity allocation process. In our opinion not all participants are aware of the complexity of the rules and how it can change the trading arrangements. Secondly, too many booking opportunities and the relations between them could lead to market manipulation.

The cost-benefit analysis is required to assess the real added value of the enormous changes to booking platforms and TSOs’ IT systems.

The reduction of physical bottlenecks could be solved rather by the development of transmission network than development of IT booking systems.

Impacted stakeholders (ACER, booking platforms, market participants, TSOs) should know reasonably long in advance the expected changes to adapt to changes.

It shall be analysed if implementation of a new, complicated system with so many auctions for the same product will lead to increase of capacity sale by the TSOs in comparison to the currently applied methods.

From the Issue Solution and Issue Solution Supporting Note we identified the 3 ways of conducting auctioning of yearly, quarterly and monthly auctions:

1. ACA auction for yearly, quarterly and monthly firm capacities (without additional UPA auctions) – the current NC CAM solution (no changes to NC CAM);
2. Additional booking opportunities: any firm Y, firm Q and firm M capacities will be auctioned in subsequent UPA auctions after ACA auctions have been finished;
3. Additional booking opportunities: any firm Y, firm Q and firm M capacities will be auctioned in subsequent UPA auctions after ACA auctions have been terminated. The forced termination is done in time in advance to organize UPA auctions.

Regarding the minimum prices of additional UPA auctions applicable for point 2 and point 3 above there are 2 variants:

a. UPA minimum price is equal to the last price from corresponding ACA auction;
b. UPA minimum price is equal to the tariff reserve price.

Considering the efficiency and simplicity, the first solution is optimal in GSA Platform opinion. If it appears that the market is interested in implementing of solution in point 2 or point 3 and willing to pay for them, further cost-benefit and technical analysis is required. All proposed changes to be implemented require a significant commitment of time and cost. The implementation process for such changes also requires time (2 years) and efforts to present the proposed changes to the market.
Policy paper reference | Nature of proposal in the policy paper | Area of improvement
---|---|---
FUNC 01/2020 "Greater flexibility to book firm capacity at IPS" - Issue Solution and Issue Solution Supporting Note | **Additional booking opportunities**  
- Any M firm capacity available after ACAs will be auctioned in subsequent UPAs;  
- Proposed regularly: weekly, on Thursdays (subject to change according to flexibility proposal)  
- Once proposed via UPA, a product can no longer be proposed via ACA again (ACER and ENTSOG have diverging views on the implementation)  

**Advance booking of monthly products**  
- All 3 M products within a given Q will be auctioned via ACA before start of Q, then auctioned via UPA each week  

*34 Do you agree with ACER's review of this CAM NC article and the identified area(s) of improvement (yes=amendment identified, maybe= amendment may improve market, no=no change envisioned)?*

- Strongly agree
- Agree
- Neutral
- Disagree
- Strongly disagree

*35 Please elaborate on why do you agree or disagree with ACER's review, being specific about which elements you agree or disagree with? Are there further improvements that you consider relevant in this area in addition to the ones raised by ACER in the scoping document; please explain your reasoning?*

GSA Platform is of the opinion that too many auctions and difficult rules of auctioning may burden the capacity allocation process. In our opinion not all participants are aware of the complexity of the rules and how it can change the trading arrangements. Secondly, too many booking opportunities and the relations between them could lead to market manipulation.

The cost-benefit analysis is required to assess the real added value of the enormous changes to booking platforms and TSOs’ IT systems.

The reduction of physical bottlenecks could be solved rather by the development of transmission network than development of IT booking systems.

Impacted stakeholders (ACER, booking platforms, market participants, TSOs) should know reasonably long in advance the expected changes to adapt to changes.

It shall be analysed if implementation of a new, complicated system with so many auctions for the same product will lead to increase of capacity sale by the TSOs in comparison to the currently applied methods.

From the Issue Solution and Issue Solution Supporting Note we identified the 3 ways of conducting auctioning of yearly, quarterly and monthly auctions:
1. ACA auction for yearly, quarterly and monthly firm capacities (without additional UPA auctions) – the current NC CAM solution (no changes to NC CAM);

2. Additional booking opportunities: any firm Y, firm Q and firm M capacities will be auctioned in subsequent UPA auctions after ACA auctions have been finished;

3. Additional booking opportunities: any firm Y, firm Q and firm M capacities will be auctioned in subsequent UPA auctions after ACA auctions have been terminated. The forced termination is done in time in advance to organize UPA auctions.

Regarding the minimum prices of additional UPA auctions applicable for point 2 and point 3 above there are 2 variants:

a. UPA minimum price is equal to the last price from corresponding ACA auction;

b. UPA minimum price is equal to the tariff reserve price.

Considering the efficiency and simplicity, the first solution is optimal in GSA Platform opinion.

If it appears that the market is interested in implementing of solution in point 2 or point 3 and willing to pay for them, further cost-benefit and technical analysis is required. All proposed changes to be implemented require a significant commitment of time and cost. The implementation process for such changes also requires time (2 years) and efforts to present the proposed changes to the market.

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**CAM NC**

**Article 13A – Rolling balance-of-month capacity auctions (new)**

<table>
<thead>
<tr>
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<th>Nature of proposal in the policy paper</th>
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</thead>
</table>
| FUNC 01/2020 “Greater flexibility to book firm capacity at IPs” - Issue Solution and Issue Solutions Supporting Note | Advance booking of day-ahead products
  • Introduction of a ‘Balance-of-Month’ product (OPTION)

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* 36 Do you agree with ACER’s review of this CAM NC article and the identified area(s) of improvement (yes=amendment identified, maybe= amendment may improve market, no=no change envisioned)?

An amendment may further improve the market functioning and better capacity allocation

- [ ] Strongly agree
- [ ] Agree
- [ ] Neutral
- [ ] Disagree
- [ ] Strongly disagree

* 37 Please elaborate on why do you agree or disagree with ACER’s review, being specific about which elements you agree or disagree with? Are there further improvements that you consider relevant in this area in addition to the ones raised by ACER in the scoping document; please explain your reasoning?
Implementation of advances booking of day-ahead product would require significant changes to booking platforms as well as TSOs’ IT systems. The implementation process for such changes requires time (estimated 2 years for the GSA Platform), cost as well as efforts to present the proposed changes to the market. Further cost-benefit and technical analyses are required to assess the added value of introducing Balance of the Month product or advanced day-ahead booking opportunities.

CAM NC

Article 14 – Rolling day-ahead capacity auctions

<table>
<thead>
<tr>
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<th>Area of improvement</th>
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</table>
| FUNC 01/2020 “Greater flexibility to book firm capacity at IPs” – Issue Solution and Issue Solutions Supporting Note | Advance booking of day-ahead products  
- Daily offer of DA products for the following 7 days on a rolling basis until the end of the month (cf. Annex 1 – Issue Solution Supporting Note Evaluation of FUNC Issue 01/2020 “Greater flexibility to book firm capacity at IPs” 2023, p. 18) | yes |

*38 Do you agree with ACER's review of this CAM NC article and the identified area(s) of improvement (yes=amendment identified, maybe= amendment may improve market, no=no change envisioned)?

An amendment may further improve the market functioning and better capacity allocation

- [ ] Strongly agree
- [ ] Agree
- [ ] Neutral
- [ ] Disagree
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*39 Please elaborate on why do you agree or disagree with ACER's review, being specific about which elements you agree or disagree with? Are there further improvements that you consider relevant in this area in addition to the ones raised by ACER in the scoping document; please explain your reasoning?

Implementation of advances booking of day-ahead product would require significant changes to booking platforms as well as TSOs’ IT systems. The implementation process for such changes requires time (estimated 2 years for the GSA Platform), cost as well as efforts to present the proposed changes to the market. Further cost-benefit and technical analyses are required to assess the added value of introducing Balance of the Month product or advanced day-ahead booking opportunities.
Do you agree with ACER’s review of this CAM NC article and the identified area(s) of improvement (yes= amendment identified, maybe= amendment may improve market, no= no change envisioned)?

An amendment may further improve the market functioning and better capacity allocation

- Strongly agree
- Agree
- Neutral
- Disagree
- Strongly disagree

Please elaborate on why do you agree or disagree with ACER’s review, being specific about which elements you agree or disagree with? Are there further improvements that you consider relevant in this area in addition to the ones raised by ACER in the scoping document; please explain your reasoning?

An earlier closing time would mean that network users would know earlier whether they had succeeded in acquiring capacity and it would give Booking platforms extra time to perform IT system maintenance. However, GSA Platform would like to leave this decision to market participants.
Do you agree with ACER's review of this CAM NC article and the identified area(s) of improvement (yes=amendment identified, maybe= amendment may improve market, no=no change envisioned)?

An amendment may further improve the market functioning and better capacity allocation

- Strongly agree
- Agree
- Neutral
- Disagree
- Strongly disagree

Please elaborate on why do you agree or disagree with ACER's review, being specific about which elements you agree or disagree with? Are there further improvements that you consider relevant in this area in addition to the ones raised by ACER in the scoping document; please explain your reasoning?

GSA Platform is of the opinion that too many auctions and difficult rules of auctioning may burden the capacity allocation process. In our opinion not all participants are aware of the complexity of the rules and how it can change the trading arrangements. Secondly, too many booking opportunities and the relations between them could lead to market manipulation.

The cost-benefit analysis is required to assess the real added value of the enormous changes to booking platforms and TSOs’ IT systems.

The reduction of physical bottlenecks could be solved rather by the development of transmission network than development of IT booking systems.

Impacted stakeholders (ACER, booking platforms, market participants, TSOs) should know reasonably long in advance the expected changes to adapt to changes.

It shall be analysed if implementation of a new, complicated system with so many auctions for the same product will lead to increase of capacity sale by the TSOs in comparison to the currently applied methods.

From the Issue Solution and Issue Solution Supporting Note we identified the 3 ways of conducting auctioning of yearly, quarterly and monthly auctions:
1. ACA auction for yearly, quarterly and monthly firm capacities (without additional UPA auctions) – the current NC CAM solution (no changes to NC CAM);
2. Additional booking opportunities: any firm Y, firm Q and firm M capacities will be auctioned in subsequent UPA auctions after ACA auctions have been finished;
3. Additional booking opportunities: any firm Y, firm Q and firm M capacities will be auctioned in subsequent UPA auctions after ACA auctions have been terminated. The forced termination is done in time in advance to organize UPA auctions.

Regarding the minimum prices of additional UPA auctions applicable for point 2 and point 3 above there are 2 variants:

a. UPA minimum price is equal to the last price from corresponding ACA auction;
b. UPA minimum price is equal to the tariff reserve price.

Considering the efficiency and simplicity, the first solution is optimal in GSA Platform opinion.

If it appears that the market is interested in implementing of solution in point 2 or point 3 and willing to pay for them, further cost-benefit and technical analysis is required. All proposed changes to be implemented require a significant commitment of time and cost. The implementation process for such changes also requires time (2 years) and efforts to present the proposed changes to the market.

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**ACER**

**Article 17 – Ascending clock auction algorithm**

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<thead>
<tr>
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<th>Area of improvement</th>
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<tbody>
<tr>
<td>FUNC 01/2020 “Greater flexibility to book firm capacity at IPS” - Issue Solution and Issue Solutions Supporting Note</td>
<td>More efficiency in the ACA allocation process</td>
<td></td>
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<td></td>
<td>• Explicitly allow TSOs to partly decide to modify the level of price steps during the auction process (cf. Annex 1 – Issue Solution Supporting Note Evaluation of FUNC issue 01/2020 “Greater flexibility to book firm capacity at IPS” 2023, p. 21)</td>
<td></td>
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<td></td>
<td>• Provide for a termination rule of ACA, to allow UPA to take place (cf. Annex 1 – Issue Solution Supporting Note Evaluation of FUNC issue 01/2020 “Greater flexibility to book firm capacity at IPS” 2023, p. 28)</td>
<td>yes</td>
</tr>
<tr>
<td>FUNC 01/2020 “Greater flexibility to book firm capacity at IPS” - Issue Solution and Issue Solutions Supporting Note</td>
<td>Investigate the possibility/need of introducing a pro-rata rule under ACA</td>
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<td>• &quot;The option of a pro-rata allocation under ACA was overall not considered optimal by NRAs and TSOs insofar as (i) it would require the ACA algorithm to be amended as its current parameters do not allow for this feature and as (ii) allowing for a change in the level of price steps during the auction process was deemed easier and more efficient. In any case, with additional UPA taking place after ACAs, a pro-rata allocation will take place if demand exceeds offer under already existing UPA rules.&quot; (cf. Annex 1 – Issue Solution Supporting Note Evaluation of FUNC issue 01/2020 “Greater flexibility to book firm capacity at IPS” 2023, p. 21)</td>
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<td></td>
<td>• Assess whether a pro-rata rule should be added to the ACA algorithm in cases of long lasting auctioning processes and/or to reduce the risk of price manipulation (cf. Annex 1 – Issue Solution Supporting Note Evaluation of FUNC issue 01/2020 “Greater flexibility to book firm capacity at IPS” 2023, p. 21)</td>
<td>maybe</td>
</tr>
<tr>
<td>N/A</td>
<td>• Assess the most efficient way of improving the efficiency of the ACA algorithm, in particular the introduction of a pro-rata allocation, in view of maximization of allocated volumes and risk of price manipulation (cf. CMNC note)</td>
<td>maybe</td>
</tr>
</tbody>
</table>

**44** Do you agree with ACER’s review of this CAM NC article and the identified area(s) of improvement (yes=amendment identified, maybe= amendment may improve market, no=no change envisioned)?

- [ ] Strongly agree
- [ ] Agree
- [ ] Neutral
- [ ] Disagree
- [ ] Strongly disagree

**45** Please elaborate on why do you agree or disagree with ACER’s review, being specific about which elements you agree or disagree with? Are there further improvements that you consider relevant in this area in addition to the ones raised by ACER in the scoping document; please explain your reasoning?
GSA Platform has the following considerations regarding the several proposals included in this question:

1) No need to adjust the large price-steps during the auction
   
The solution is very complex and would require analysis of the costs and benefits associated with its implementation. There are already alternatives which can be used without introducing such change, namely adjustment of the large price step beforehand (e.g., based on price spreads between adjacent HUBs which are a good indication for the willingness to pay). It is important for all parties to know what the "rules of the game" are before the auction commences. Amending price steps mid auction risks disrupting the auction.

2) Provide a termination rule for ACA to allow for UPA to start
   
   GSA Platform is of the opinion that too many auctions and difficult rules of auctioning may burden the capacity allocation process. In our opinion not all participants are aware of the complexity of the rules and how it can change the trading arrangements. Secondly, too many booking opportunities and the relations between them could lead to market manipulation.

   The cost-benefit analysis is required to assess the real added value of the enormous changes to booking platforms and TSOs' IT systems.

   The reduction of physical bottlenecks could be solved rather by the development of transmission network than development of IT booking systems.

   Impacted stakeholders (ACER, booking platforms, market participants, TSOs) should know reasonably long in advance the expected changes to adapt to changes.

   It shall be analysed if implementation of a new, complicated system with so many auctions for the same product will lead to increase of capacity sale by the TSOs in comparison to the currently applied methods.

   From the Issue Solution and Issue Solution Supporting Note we identified the 3 ways of conducting auctioning of yearly, quarterly and monthly auctions:

   1. ACA auction for yearly, quarterly and monthly firm capacities (without additional UPA auctions) – the current NC CAM solution (no changes to NC CAM);
   2. Additional booking opportunities: any firm Y, firm Q and firm M capacities will be auctioned in subsequent UPA auctions after ACA auctions have been finished;
   3. Additional booking opportunities: any firm Y, firm Q and firm M capacities will be auctioned in subsequent UPA auctions after ACA auctions have been terminated. The forced termination is done in time in advance to organize UPA auctions.

   Regarding the minimum prices of additional UPA auctions applicable for point 2 and point 3 above there are 2 variants:

   a. UPA minimum price is equal to the last price from corresponding ACA auction;
   b. UPA minimum price is equal to the tariff reserve price.

   Considering the efficiency and simplicity, the first solution is optimal in GSA Platform opinion.

   If it appears that the market is interested in implementing of solution in point 2 or point 3 and willing to pay for them, further cost-benefit and technical analysis is required. All proposed changes to be implemented require a significant commitment of time and cost. The implementation process for such changes also requires time (2 years) and efforts to present the proposed changes to the market.

3) On a pro rata allocation of capacity
   
   In our opinion pro-rata allocation of capacity can force some market players to buy the capacity amount they do not wanted and the other market players would have less capacity they wanted.
Please note that there is not such a solution introduced as capacity pro-rata allocation, so it requires cost and time consuming changes in booking platforms and TSOs’ IT systems.

ACER

Article 18 – Uniform-price auction algorithm

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<td></td>
<td>/</td>
<td>no</td>
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</tbody>
</table>

46. Do you agree with ACER’s review of this CAM NC article and the identified area(s) of improvement (yes=amendment identified, maybe= amendment may improve market, no=no change envisioned)?

- Strongly agree
- Agree
- Neutral
- Disagree
- Strongly disagree

47. Please elaborate on why do you agree or disagree with ACER’s review, being specific about which elements you agree or disagree with? Are there further improvements that you consider relevant in this area in addition to the ones raised by ACER in the scoping document; please explain your reasoning?

Uniform price auction algorithm is well described in current CAM NC.

H CAM NC, Chapter IV
Bundling of capacity at interconnection points (Articles 19-21)
Do you agree with ACER’s review of this CAM NC article and the identified area(s) of improvement (yes=amendment identified, maybe=amendment may improve market, no=no change envisioned)?

An amendment may further improve the market functioning and better capacity allocation

- Strongly agree
- Agree
- Neutral
- Disagree
- Strongly disagree

Please elaborate on why do you agree or disagree with ACER's review, being specific about which elements you agree or disagree with? Are there further improvements that you consider relevant in this area in addition to the ones raised by ACER in the scoping document; please explain your reasoning?

TSO adjust to the technical capacity of their network on an ongoing basis. If it is possible to increase the capacity offered at their interconnection points, they publish such information and provide it to the booking platforms. The booking platforms make these additional capacities bundled as much as possible. The market is informed about maximum available capacity as soon as possible because offered capacity is published on booking platforms during particular products’ auctions.
50 Do you agree with ACER's review of this CAM NC article and the identified area(s) of improvement (yes=amendment identified, maybe= amendment may improve market, no=no change envisioned)?

An amendment may further improve the market functioning and better capacity allocation
- Strongly agree
- Agree
- Neutral
- Disagree
- Strongly disagree

51 Please elaborate on why do you agree or disagree with ACER's review, being specific about which elements you agree or disagree with? Are there further improvements that you consider relevant in this area in addition to the ones raised by ACER in the scoping document; please explain your reasoning?

For above question option "neutral" has been selected. Issue is not directly relevant and/or affecting the auctioning platform.
Do you agree with ACER's review of this CAM NC article and the identified area(s) of improvement (yes=amendment identified, maybe= amendment may improve market, no=no change envisioned)?

An amendment may further improve the market functioning and better capacity allocation

- Strongly agree
- Agree
- Neutral
- Disagree
- Strongly disagree

Please elaborate on why do you agree or disagree with ACER's review, being specific about which elements you agree or disagree with? Are there further improvements that you consider relevant in this area in addition to the ones raised by ACER in the scoping document; please explain your reasoning?

For above question option “neutral” has been selected. Issue is not directly relevant and/or affecting the auctioning platform.

I CAM NC, Chapter V
Incremental capacity process (Articles 22-31)
**Policy paper reference** | **Nature of proposal in the policy paper** | **Area of improvement**
---|---|---
/ | / | no

N/A | The chapter on incremental capacity should be deleted from the NC. Triggering (cross-border) investments in light of climate neutrality objectives could be considered contradicting and experience with incremental processes in the past showed little relevance against cumbersome procedures. | maybe

54 Do you agree with ACER's review of this CAM NC article and the identified area(s) of improvement (yes=amendment identified, maybe= amendment may improve market, no=no change envisioned)?

- An amendment may further improve the market functioning and better capacity allocation
  - [ ] Strongly agree
  - [ ] Agree
  - [ ] Neutral
  - [ ] Disagree
  - [ ] Strongly disagree

55 Please elaborate on why do you agree or disagree with ACER's review, being specific about which elements you agree or disagree with? Are there further improvements that you consider relevant in this area in addition to the ones raised by ACER in the scoping document; please explain your reasoning?

For above question option “neutral” has been selected. Issue is not directly relevant and/or affecting the auctioning platform.
Do you agree with ACER’s review of this CAM NC article and the identified area(s) of improvement (yes=amendment identified, maybe= amendment may improve market, no=no change envisioned)?

An amendment may further improve the market functioning and better capacity allocation

- Strongly agree
- Agree
- Neutral
- Disagree
- Strongly disagree

56. Do you agree with ACER’s review of this CAM NC article and the identified area(s) of improvement (yes=amendment identified, maybe= amendment may improve market, no=no change envisioned)?

57. Please elaborate on why do you agree or disagree with ACER’s review, being specific about which elements you agree or disagree with? Are there further improvements that you consider relevant in this area in addition to the ones raised by ACER in the scoping document; please explain your reasoning?

For above question option “neutral” has been selected. Issue is not directly relevant and/or affecting the auctioning platform.
Do you agree with ACER’s review of this CAM NC article and the identified area(s) of improvement (yes=amendment identified, maybe= amendment may improve market, no=no change envisioned)?

An amendment may further improve the market functioning and better capacity allocation

- Strongly agree
- Agree
- Neutral
- Disagree
- Strongly disagree

Please elaborate on why do you agree or disagree with ACER's review, being specific about which elements you agree or disagree with? Are there further improvements that you consider relevant in this area in addition to the ones raised by ACER in the scoping document; please explain your reasoning?

For above question option “neutral” has been selected. Issue is not directly relevant and/or affecting the auctioning platform.

CAM NC
Article 24 – Combination into single economic test

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<td>no</td>
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<tr>
<td>N/A</td>
<td>The chapter on incremental capacity should be deleted from the NC. Triggering (cross-border) investments in light of climate neutrality objectives could be considered contradicting and experience with incremental processes in the past showed little relevance against cumbersome procedures.</td>
<td>maybe</td>
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CAM NC
Article 25 – Publication requirements relating to the economic test

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<td>I</td>
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<tr>
<td>N/A</td>
<td>The chapter on incremental capacity should be deleted from the NC. Triggering (cross-border) investments in light of climate neutrality objectives could be considered contradicting and experience with incremental processes in the past showed little relevance against cumbersome procedures.</td>
<td>maybe</td>
</tr>
</tbody>
</table>

* Hydrogen and decarbonised gas markets package must fix legal basis
  * Judgement of the General Court: 16 March 2022 (T-694/19 and T-704/19)

60 Do you agree with ACER's review of this CAM NC article and the identified area(s) of improvement (yes=amendment identified, maybe= amendment may improve market, no=no change envisioned)?

- Strongly agree
- Agree
- Neutral
- Disagree
- Strongly disagree

61 Please elaborate on why do you agree or disagree with ACER's review, being specific about which elements you agree or disagree with? Are there further improvements that you consider relevant in this area in addition to the ones raised by ACER in the scoping document; please explain your reasoning?

For above question option “neutral” has been selected. Issue is not directly relevant and/or affecting the auctioning platform.
Do you agree with ACER's review of this CAM NC article and the identified area(s) of improvement (yes=amendment identified, maybe= amendment may improve market, no=no change envisioned)?

An amendment may further improve the market functioning and better capacity allocation

- Strongly agree
- Agree
- Neutral
- Disagree
- Strongly disagree

Please elaborate on why do you agree or disagree with ACER's review, being specific about which elements you agree or disagree with? Are there further improvements that you consider relevant in this area in addition to the ones raised by ACER in the scoping document; please explain your reasoning?

For above question option “neutral” has been selected. Issue is not directly relevant and/or affecting the auctioning platform.
Do you agree with ACER’s review of this CAM NC article and the identified area(s) of improvement (yes=amendment identified, maybe= amendment may improve market, no=no change envisioned)?

An amendment may further improve the market functioning and better capacity allocation

- Strongly agree
- Agree
- Neutral
- Disagree
- Strongly disagree

Please elaborate on why do you agree or disagree with ACER's review, being specific about which elements you agree or disagree with? Are there further improvements that you consider relevant in this area in addition to the ones raised by ACER in the scoping document; please explain your reasoning?

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Do you agree with ACER’s review of this CAM NC article and the identified area(s) of improvement (yes=amendment identified, maybe= amendment may improve market, no=no change envisioned)?

- An amendment may further improve the market functioning and better capacity allocation

  - Strongly agree
  - Agree
  - Neutral
  - Disagree
  - Strongly disagree

Please elaborate on why do you agree or disagree with ACER’s review, being specific about which elements you agree or disagree with? Are there further improvements that you consider relevant in this area in addition to the ones raised by ACER in the scoping document; please explain your reasoning?

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Do you agree with ACER’s review of this CAM NC article and the identified area(s) of improvement (yes=amendment identified, maybe= amendment may improve market, no=no change envisioned)?

An amendment may further improve the market functioning and better capacity allocation

- Strongly agree
- Agree
- Neutral
- Disagree
- Strongly disagree

Please elaborate on why do you agree or disagree with ACER's review, being specific about which elements you agree or disagree with? Are there further improvements that you consider relevant in this area in addition to the ones raised by ACER in the scoping document; please explain your reasoning?

For above question option “neutral” has been selected. Issue is not directly relevant and/or affecting the auctioning platform.
Do you agree with ACER's review of this CAM NC article and the identified area(s) of improvement (yes=amendment identified, maybe= amendment may improve market, no=no change envisioned)?

An amendment may further improve the market functioning and better capacity allocation

- Strongly agree
- Agree
- Neutral
- Disagree
- Strongly disagree

Please elaborate on why do you agree or disagree with ACER's review, being specific about which elements you agree or disagree with? Are there further improvements that you consider relevant in this area in addition to the ones raised by ACER in the scoping document; please explain your reasoning?

For above question option "neutral" has been selected. Issue is not directly relevant and/or affecting the auctioning platform.
Do you agree with ACER’s review of this CAM NC article and the identified area(s) of improvement (yes=amendment identified, maybe= amendment may improve market, no=no change envisioned)?

An amendment may further improve the market functioning and better capacity allocation

- Strongly agree
- Agree
- Neutral
- Disagree
- Strongly disagree

Please elaborate on why do you agree or disagree with ACER’s review, being specific about which elements you agree or disagree with? Are there further improvements that you consider relevant in this area in addition to the ones raised by ACER in the scoping document; please explain your reasoning?

For above question option “neutral” has been selected. Issue is not directly relevant and/or affecting the auctioning platform.

J CAM NC, Chapter VI
Interruptible capacity (Articles 32-36)
74 Do you agree with ACER’s review of this CAM NC article and the identified area(s) of improvement (yes=amendment identified, maybe= amendment may improve market, no=no change envisioned)?

- Strongly agree
- Agree
- Neutral
- Disagree
- Strongly disagree

75 Please elaborate on why do you agree or disagree with ACER's review, being specific about which elements you agree or disagree with? Are there further improvements that you consider relevant in this area in addition to the ones raised by ACER in the scoping document; please explain your reasoning?

Implementation of advances booking of day-ahead product would require significant changes to booking platforms as well as TSOs’ IT systems. The implementation process for such changes requires time (estimated 2 years for the GSA Platform), cost as well as efforts to present the proposed changes to the market. Further cost-benefit and technical analyses are required to assess the added value of introducing Balance of the Month product or advanced day-ahead booking opportunities.

Most of TSOs active on GSA Platform adjust offered capacity to the technical capacity of their network on an ongoing basis. If it is possible to increase the capacity offered at the booking platform, they provide it to the GSA Platform. The GSA Platform makes these additional capacities bundled as much as possible. The market is informed about maximum available capacity because it is published as amount of offered capacity during auctions for capacity products for particular IP and runtime.

The implementation process for such changes requires time (estimated 2 years for the GSA Platform), cost and efforts to present the proposed changes to the market. In GSA Platform opinion such complex booking idea will not be beneficial to the market and cannot make TSOs start selling more capacity. Further cost-benefit and technical analyses are required to assess the added value of introducing Balance of the Month product or advanced day-ahead booking opportunities.
Do you agree with ACER's review of this CAM NC article and the identified area(s) of improvement (yes=amendment identified, maybe= amendment may improve market, no=no change envisioned)?

An amendment may further improve the market functioning and better capacity allocation

- Strongly agree
- Agree
- Neutral
- Disagree
- Strongly disagree

Please elaborate on why do you agree or disagree with ACER's review, being specific about which elements you agree or disagree with? Are there further improvements that you consider relevant in this area in addition to the ones raised by ACER in the scoping document; please explain your reasoning?

For above question option “neutral” has been selected. Issue is not directly relevant and/or affecting the auctioning platform.
* 78 Do you agree with ACER's review of this CAM NC article and the identified area(s) of improvement (yes=amendment identified, maybe= amendment may improve market, no=no change envisioned)?

An amendment may further improve the market functioning and better capacity allocation

☐ Strongly agree
☐ Agree
☐ Neutral
☐ Disagree
☐ Strongly disagree

* 79 Please elaborate on why do you agree or disagree with ACER's review, being specific about which elements you agree or disagree with? Are there further improvements that you consider relevant in this area in addition to the ones raised by ACER in the scoping document; please explain your reasoning?

For above question option "neutral" has been selected. Issue is not directly relevant and/or affecting the auctioning platform.
80. Do you agree with ACER's review of this CAM NC article and the identified area(s) of improvement (yes=amendment identified, maybe= amendment may improve market, no=no change envisioned)?

- An amendment may further improve the market functioning and better capacity allocation
  - Strongly agree
  - Agree
  - Neutral
  - Disagree
  - Strongly disagree

81. Please elaborate on why do you agree or disagree with ACER's review, being specific about which elements you agree or disagree with? Are there further improvements that you consider relevant in this area in addition to the ones raised by ACER in the scoping document; please explain your reasoning?

For above question option “neutral” has been selected. Issue is not directly relevant and/or affecting the auctioning platform.
• 82 Do you agree with ACER's review of this CAM NC article and the identified area(s) of improvement (yes=amendment identified, maybe= amendment may improve market, no=no change envisioned)?

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An amendment may further improve the market functioning and better capacity allocation

- Strongly agree
- Agree
- Neutral
- Disagree
- Strongly disagree

• 83 Please elaborate on why do you agree or disagree with ACER's review, being specific about which elements you agree or disagree with? Are there further improvements that you consider relevant in this area in addition to the ones raised by ACER in the scoping document; please explain your reasoning?

For above question option “neutral” has been selected. Issue is not directly relevant and/or affecting the auctioning platform.

K CAM NC, Chapter VII
Capacity booking platforms (Article 37)
Do you agree with ACER's review of this CAM NC article and the identified area(s) of improvement (yes= amendment identified, maybe= amendment may improve market, no= no change envisioned)?

An amendment may further improve the market functioning and better capacity allocation

- Strongly agree
- Agree
- Neutral
- Disagree
- Strongly disagree

Please elaborate on why do you agree or disagree with ACER's review, being specific about which elements you agree or disagree with? Are there further improvements that you consider relevant in this area in addition to the ones raised by ACER in the scoping document; please explain your reasoning?

The involvement of ACER in the booking platform process provided in CAM NC may be revised. However, in case of lack of TSOs agreement a harmonized decision of both NRAs is required and shall remain in the CAM NC. When NRAs are not able to reach an agreement the Agency is competent to adopt individual decision by virtue of Art. 6 par. 10 of the Regulation (EU) 2019/942. There is and should be a competent body to take decisions in case of potential cross-border disagreements. Otherwise, in this particular case the market would not have a tool to book bundled capacities at IPs and CAM NC provisions could not be executed.

With regard to proposed extension of decision on the booking platform GSA Platform is of the opinion that it may be prolonged but it shall not exceed 5 years.

L CAM NC, Chapter VIII
Final provisions (Articles 37A-40)
Do you agree with ACER’s review of this CAM NC article and the identified area(s) of improvement (yes= amendment identified, maybe= amendment may improve market, no=no change envisioned)?

An amendment may further improve the market functioning and better capacity allocation

- Strongly agree
- Agree
- Neutral
- Disagree
- Strongly disagree

Please elaborate on why do you agree or disagree with ACER’s review, being specific about which elements you agree or disagree with? Are there further improvements that you consider relevant in this area in addition to the ones raised by ACER in the scoping document; please explain your reasoning?

In GSA Platform point of view the rules established in CAM NC are transparent and collected in one legal act. Opening the possibility of the CAM NC rules’ amendment without the formal Regulation amendment process can lead to changes of legal acts that apply automatically and uniformly to all EU Member States as soon as they enter into force, without a need to be transposed into national law. The prominence of such regulations as CAM NC is too great and it shall not be amended without applying the procedures foreseen for such regulations, even if the changes might be of minor, technical nature. Market users who shall have the stability and advanced awareness of the rules and timelines for capacity allocation in gas transmission systems could be confused with such ad hoc changes and therefore it could lead to many complaints from network users towards the booking platform operators and transmission system. In addition, the booking platforms operator shall be aware well in advance of any new functionalities or changes to be introduced on their booking platforms and be provided with necessary time for their cost estimation and implementation. Thus, the comitology process is essential to keep such principles as market stability and transparency as well as implementation predictability for IT booking systems.
Do you agree with ACER's review of this CAM NC article and the identified area(s) of improvement (yes=amendment identified, maybe= amendment may improve market, no=no change envisioned)?

An amendment may further improve the market functioning and better capacity allocation

- Strongly agree
- Agree
- Neutral
- Disagree
- Strongly disagree

Please elaborate on why do you agree or disagree with ACER's review, being specific about which elements you agree or disagree with? Are there further improvements that you consider relevant in this area in addition to the ones raised by ACER in the scoping document; please explain your reasoning?

For above question option “neutral” has been selected. Issue is not directly relevant and/or affecting the auctioning platform.
This article concerns legal procedural matters; please write down any comments you may have on this article?

GSA Platform does not have any concerns to the article. If CAM NC is amended again reference to former Regulation (EU) No 984/2013 shall not apply any more.

This article concerns legal procedural matters; please write down any comments you may have on this article?

M Other comments or suggestions
Do you have any other comments or suggestions?

GSA Platform is of the opinion that too many auctions and difficult rules of auctioning may burden the capacity allocation process. It refers especially to the proposal of introducing additional UPA auctions and the new way of auctioning of daily products (7-days ahead /BoM auctioning).

From the Issue Solution and Issue Solution Supporting Note we identified the 3 ways of conducting auctioning of yearly, quarterly and monthly auctions:

1. ACA auction for yearly, quarterly and monthly firm capacities (without additional UPA auctions) – the current CAM NC solution (i.e. no changes to CAM NC);
2. Additional booking opportunities: any firm Y, firm Q and firm M capacities will be auctioned in subsequent UPA auctions after ACA auctions have been finished;
3. Additional booking opportunities: any firm Y, firm Q and firm M capacities will be auctioned in subsequent UPA auctions after ACA auctions have been terminated. The forced termination is done in time in advance to organize UPA auctions.

Regarding the minimum prices of additional UPA auctions applicable for point 2 and point 3 above there are 2 variants:

a. UPA minimum price is equal to the last price from corresponding ACA auction;
b. UPA minimum price is equal to the tariff reserve price.

Considering the efficiency and simplicity, the first solution is optimal in GSA Platform’s opinion.

The cost-benefit analysis is required to assess the real added value of the enormous changes to booking platforms and TSOs’ IT systems and if solution 2 or 3 are to be implemented.

In addition, it shall be analysed if implementation of a new, complicated system with so many auctions for the same product will lead to increase of capacity sale by the TSOs in comparison to the currently applied methods.

The reduction of physical bottlenecks could be solved rather by the development of transmission network where necessary than by development of IT booking systems. If CAM NC amendments are going to introduce new ways of capacity auctioning the lead time is required for implementation, roughly estimated for 2 years.

***

With regard to the whole scoping document, GSA Platform would also like to underline that for some questions it was hard to provide an answer due to out of scope booking platforms activities. For such questions option “neutral” has been selected without further comments and answers were provided only to elements relevant and/or affecting the auctioning platforms.

N Responses are published in full, safe for the contact person information; please confirm that your version does not contain confidential information

- 93 I understand my response will be published and
  - ☐ I confirm that my response does not contain confidential information
  - ☐ I confirm that my response contains confidential information, properly marked as such, and a non-confidential version of my answer is included

Thank you!
Contact

Contact Form