

Forward consultation feedback

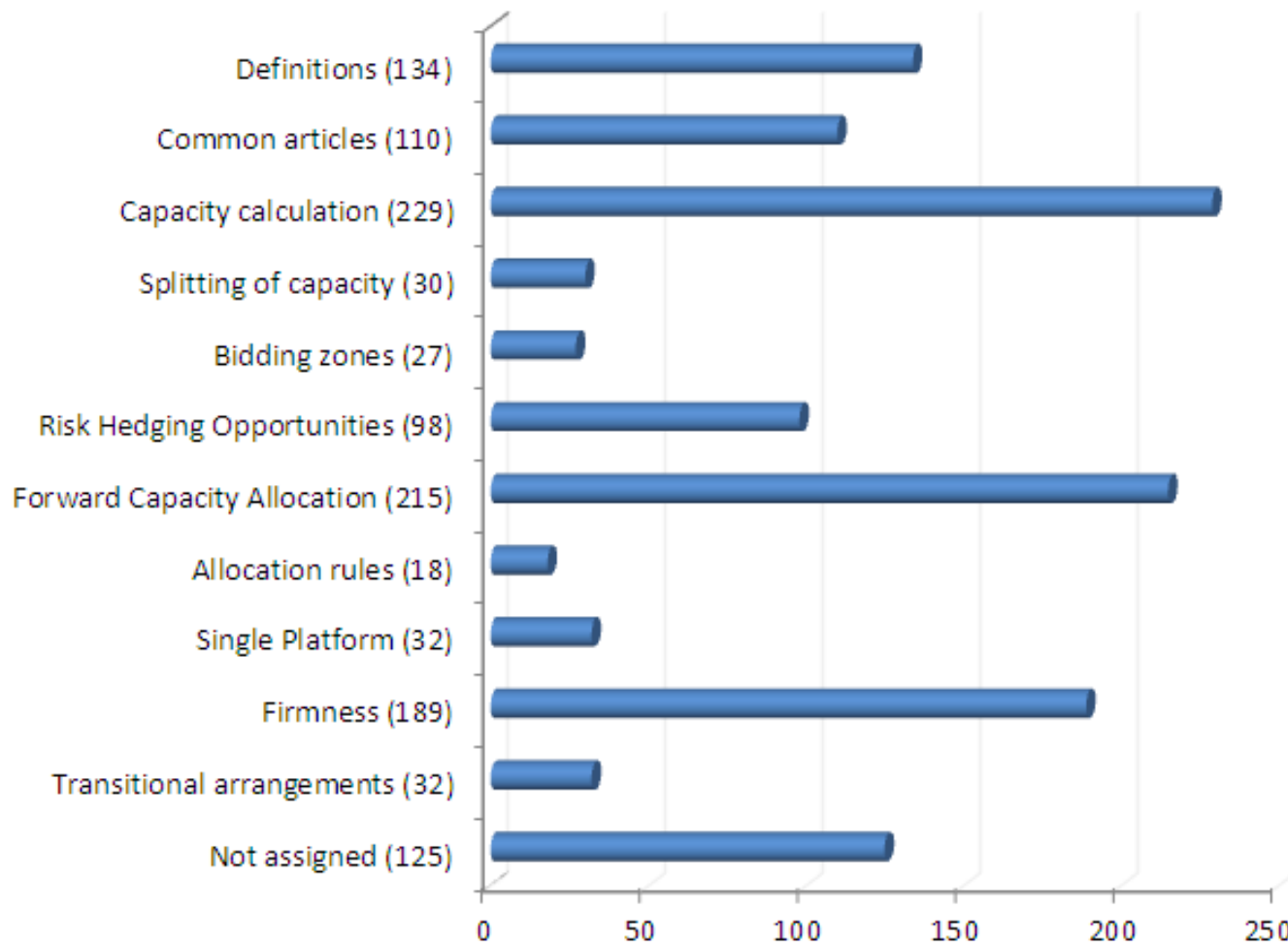


19th June 2013

William Kirk-Wilson

Overview - 1

Stakeholder comments by topic (1239)



Overview - 2

| Count | |
|-------|--|
| 116 | EURELECTRIC |
| 110 | Svenskenergi |
| 105 | ESTELA |
| 103 | ASSOELETRICA |
| 83 | EFET |
| 83 | Vattenfall AB |
| 73 | E.ON AG |
| 65 | BDEW |
| 62 | SSE plc |
| 61 | ESB |
| 50 | Danish Energy Association |
| 48 | GDF Suez |
| 35 | Edison |
| 31 | EdF |
| 28 | BritNed Development Limited |
| 24 | Alpiq Suisse SA |
| 22 | |
| 21 | ENERGYA VM GESTION DE ENERGIA S.L.U. |
| 20 | Swisselectric |
| 14 | Energy Norway |
| 13 | Oesterreichs E-Wirtschaft |
| 11 | Agder Energi |
| 10 | Finnish Energy Industries |
| 10 | Moyle Interconnector Ltd |
| 9 | NorthConnect KS |
| 9 | Synergist Projects |
| 6 | DONG Energy |
| 5 | VIK e.V. |
| 4 | E-CO Energi AS |
| 3 | Fortum Oyj |
| 2 | dc Paikallisvoima ry (The Finnish Local Power Association) |
| 1 | Nordenergi |
| 1 | Suomen EIFi Oy |
| 1 | Poyry Management Consulting |

Summary of issues

- Many identical responses.
- Common misunderstandings:
 - **Consultation/Approvals**, all key documents in this code are subject to consultation/approval. However several are bundled (eg allocation rules includes firmness, nomination, fallback etc.) to facilitate process.
 - **CACM shared text**, (coloured grey) is not the subject of the consultation unless forward specific issue. This text is already agreed and is currently with the commission.
 - **Merchant interconnectors** – GB merchant interconnectors ARE TSOs, therefore captured by this code.
 - **Secondary trading platform** – TSOs are not setting up a secondary trading platform, just a noticeboard to help market parties identify who is willing to trade

Summary of issues

- Key issues:
 - **Firmness**, ENTSO-E working in this area, likely to have revised text by next issue of code.
 - **Revenue Adequacy**, principle accepted (by some stakeholders) that TSOs shouldn't use network tariffs to cover trading costs, therefore working with ACER to refine text.
 - **Reverse Auctions**, the code allows reverse auctions but does not require them. ENTSO is not minded to codify such a requirement at such an early stage of development.
 - **Capacity Calculation**, ENTSO working on providing more detail for the complimentary approach

Summary of issues

- Other key issues:
 - **Risk Hedging Opportunities**, default is TSOs issue PTRs/FTRs, unless NRAs decide they are not needed.
 - **Synthetic FTRs**, the code currently allows TSOs to enter financial markets but does not require them to. ENTSO is not minded to codify requirement.
 - **Multiyear products**, code allows them, but does not prescribe them, subject to consultation and NRA approval.

Summary of issues

- Some of the other changes:
 - **Dispute resolution mechanism**, included in allocation rules
 - **Regional platform**, text changed to ensure status quo is ok and doesn't require an intermediate step before pan European platform
 - **Risk Hedging Opportunities**, default is TSOs issue PTRs/FTRs, unless NRAs decide they are not needed.
 - **Obligations now symmetrical**, if market parties are suspended from the market, both the market party and the TSO have to respect their contractual obligations
 - **Secondary trading**, market party only has to inform allocation platform (removed parallel obligation to inform TSO) if transmission right traded

Next steps

Currently ENTSO-E changing code to reflect stakeholder comments

- 1st week of July Revised code sent to Stakeholders
- 10th July ENTSO public workshop
- August Legal review
- 28th August ENTSO stakeholder advisory group meeting
- September Internal governance
- October Code submitted to Acer

Any questions?



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