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Public consultation paper: establishment of the priority list for the development of network for 2012 and beyond

- EDP Gás and Naturgás Energia Comercializadora Comments -

1. Are the priorities proposed for 2012 the correct ones?

In opinion of EDP Group the priorities proposed for 2012 are the correct ones. Perhaps, trading rules could be the exception. In our point of view, before analysing this issue, all the other matters should be developed and it would be necessary to get a minimum level of harmonization or interoperability in the European context too.

On the other hand, we want to say that working areas are very relevant for the shipper's activity. So in our point of view the shippers participation in the process have to be higher because finally they are going to be the agents who are going to book capacity, balance their situation, etc.

2. What should be the longer-term priorities for 2013 and beyond? Please also specify in your response the expectations you have for the scope of these priorities.

Regarding priority areas for 2013 and beyond, the commission's energy 2020 strategy calls upon ACER to establish market coupling by 2015. In our point of view, and in the concrete case of natural gas, this should decide after analyzing if this mechanism is the best way to advance in the objective to get a European natural gas market and after finishing the current discussion about the target model in the natural gas sector.

On the other hand, in our opinion as important as to develop network codes, or to identify those areas which are key to integration of the energy markets and to completion of the internal market, is to get a minimum level of harmonization or interoperability in the European context. In this way, in our point of view it is necessary to establish a transition period and a clear harmonization timetable in order to get those objectives.

3. In the 3-year-plan for electricity, several network codes are proposed for a single framework guideline. In gas, only one network code per framework guideline is foreseen. The Electricity and Gas Regulations do not specify whether a framework guideline has to be mirrored by a single network code or whether the issue can be divided into several sub-issues.

Do you agree that keeping both options, as used by ENTSO-E on the one hand and ENTSG on the other hand, are viable?

Do you agree with the order in which the sub-issues in electricity will be tackled under the framework guidelines for capacity allocation and congestion management, network connection and system operation?

Do you agree that the sub-issues marked red in the 3-year-plan for electricity in Annex 1 are the essential ones to ensure completion of the single market by 2014?