

- OGP welcomes ACER's work to progress CEER Blueprint as basis for market-driven investment procedures
- We support a harmonised economic test that specifies what level of initial bookings is required for the investment
 - Test should be set in advance and be fully transparent
 - All users should be consulted as they may share in the costs
- NRAs should co-operate and agree on a single economic test and cost-sharing arrangements for cross-border projects
 - Tariff Code to resolve issues when cost/benefits not aligned
 - Requires some harmonisation of economic test parameters

Incremental capacity (2)

OGP

- Blueprint proposed 2 options to offer incremental capacity:
 - 1) Integrated CAM auction for 'simple' hub-to-hub settings
 - Challenge will be to modify ascending clock auction to satisfy all reasonable capacity demand at the reserve price
 - 2) Open-season procedure for more complex projects
 - OGP believes this should allow fixed tariff, longer bookings (>15 years) and reduced capacity reservation (<20%)
- Network users considering to book long-term capacity would like to know their exposure
 - With fixed tariff based on investment costs the commitment is well defined; with a floating tariff the user will be exposed to paying >100% of the investment costs