

# SAG Meeting

## Summary of public consultation on FCA NC

18 June 2013

# Public consultation



**28 March – May 28**

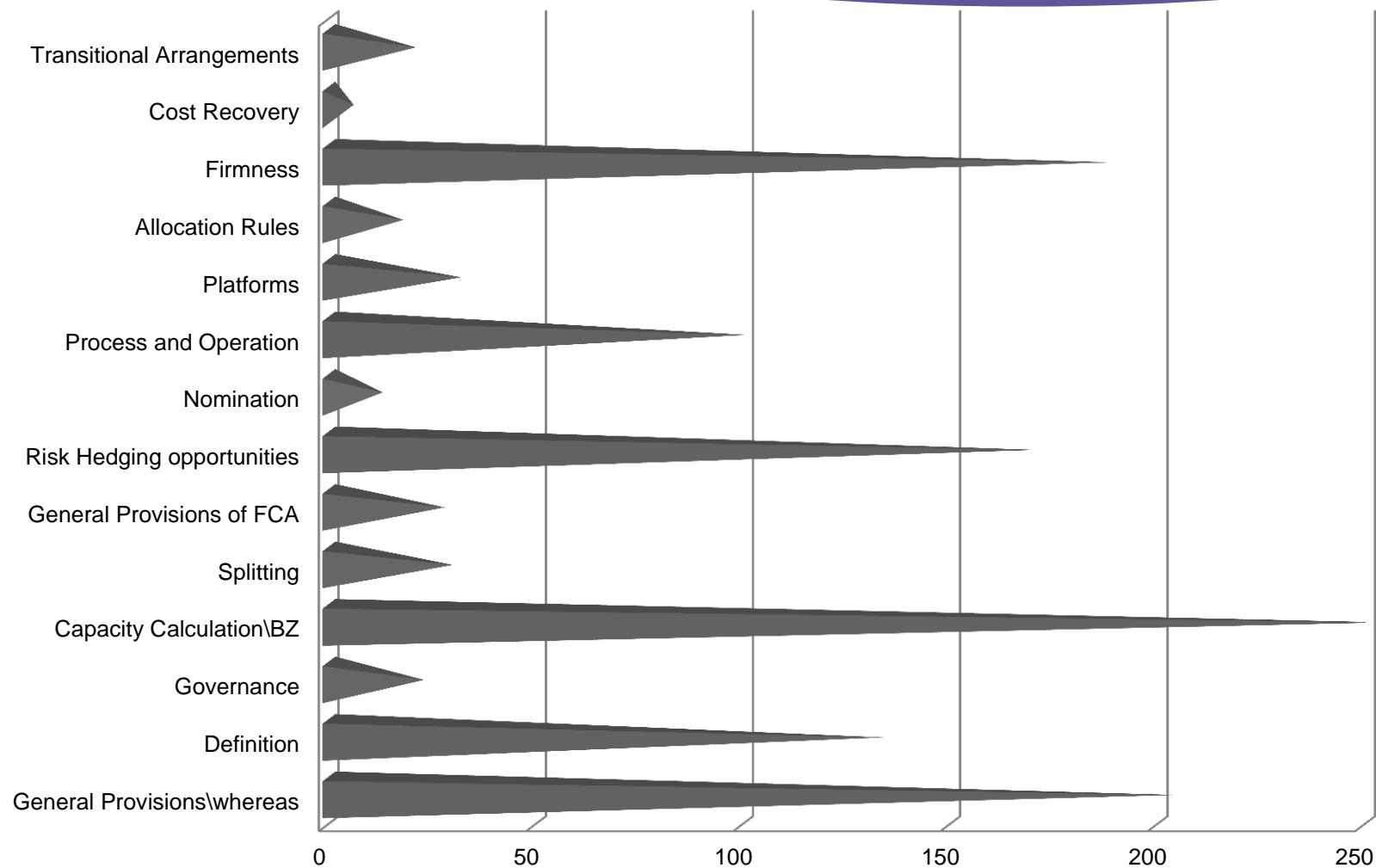
**34 different companies**

**1239 comments**

**8 May 1st Public Workshop with nearly 45 participants**

**ACER preliminary opinion**

# Distribution of comments



# Respondents



Count of Commer	Author	Company
73	Nina Scholz	E.ON AG
83	Jerome Le Page	EFET
83	Amelie Pans	Vattenfall AB
35	andrea pompa	Edison
48	Marcel Cailliau	GDF Suez
28	Lorcan Murray	BritNed Development Limited
31	Jasmina PIERRE	EdF
10	Paul McGuckin	Moyle Interconnector Ltd
24	Yves-André Bagnoud	Alpiq Suisse SA
116	Olga Mikhailova	EURELECTRIC

- **Additional comments received outside IT Tool**
- **Many identical comments**
- **Some requests to delete some definitions, include others**
- **Considerable number of comments due to misunderstandings**
- **Many comments already accepted by the DT**
- **DT working on outstanding issues that require further consideration**

- **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** – merchant interconnectors are being certified as TSOs and if they are not, their operation is done by a TSO, therefore they are captured by this code.
- **Secondary trading platform** – TSOs are not setting up a secondary trading platform, just a notice board to help market parties identify who is willing to trade



- **Risk Hedging Opportunities**, default is TSOs issue PTRs/FTRs, unless NRAs decide they are not needed.
- **Firmness**, ENTSO-E working in this area, likely to have revised text by next issue of code before the 2nd public WS
- **Revenue Adequacy**, mixed views, some accept principle that TSOs shouldn't use network tariffs to cover trading costs, 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

- **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.
- **Regional platform**, text changed to ensure status quo is ok and doesn't require an intermediate step before pan European platform
- **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



### **Currently ENTSO-E changing code to reflect stakeholder comments**

- |                           |  |
|---------------------------|--|
| ■ 1st week July           | Revised code sent to Stakeholders        |
| ■ 10 <sup>th</sup> July   | ENTSO public workshop                    |
| ■ August                  | Legal review                             |
| ■ 28 <sup>th</sup> August | ENTSO stakeholder advisory group meeting |
| ■ September               | Internal governance                      |
| ■ October                 | FCA Code submitted to Acer               |

**Thank you for your attention!**