



CRE consultation on changes to the capacity allocation mechanism at the Dunkirk IP



EFET response – 23 February 2018

The European Federation of Energy Traders (EFET) thanks CRE for the opportunity to present its view on the proposed changes to the capacity allocation mechanism at the Dunkirk IP.

EFET thanks CRE once again for its effort to include foreign market participants in the discussion by providing an English version of the public consultation.

Are you in favour of the introduction of quarterly products to the Dunkirk PIR and of the suppression of the annual rolling products, following the arrangements proposed by GRTgaz?

As expressed in the EFET response to CRE's July 2017 detailed consultation on the same subject¹, EFET agrees with the introduction of quarterly products in place of the annual rolling products.

We also agree with the auction calendar proposed by GRTgaz. It brings the regulatory framework at the Dunkirk IP as close as possible with that of the CAM NC and aligns the calendar for the Dunkirk IP on that of other French interconnection points.

¹ EFET response to the CRE consultation on the evolution of capacity allocation at the French borders, dated 7 July 2017, available at:
http://www.efet.org/Files/Documents/Downloads/EFET_CRE%20consultation%20CA_07072017.pdf.

Concerning the price multiplier, we acknowledge the consensus on the principle that it should bring the tariff for quarterly capacity higher than one fourth of the annual tariff. However, we would have welcome more justification from GRTgaz on the application of a one-third multiplier, which rather appears based on the rule of thumb than an appropriate assessment.

Finally, we agree with the GRTgaz proposal not to propose the option to convert firm into returnable capacity for the new quarterly products.