



Public Consultation by the Energy Regulatory Commission on conditions for access to gas transmission networks for gas intensive consumers

Enagás comments

9th September 2013

1. Executive Summary

1. Enagás welcomes CRE's opportunity to contribute to the public consultation on conditions for access to gas transmission networks for gas intensive consumers.
2. If the allocation mechanisms introduced by CRE at this stage were not fully in line with the CAM NC, then, their duration should not be longer than the binding date of implementation of the CAM NC (i.e 1 November 2015). It must be noted that the list of IPs for the expected or possible application of the CAM NC recently published by ENTSOG also includes the North-South link of GRTgaz.
3. The provision of capacity under specific conditions to group of network users could be discriminatory towards the rest of them. The proposed measures by CRE could grant unfair privileges to group of network users and would be added to the existing ones.

2. **Questions**

Q1: Are you in favour of the option to contractually affiliate to the North PEG natural gas intensive plants situated in the South of France?

4. No. The provision of capacity under specific conditions to a group of network users would be discriminatory and against the underlining principles of the NC on CAM. If the objective was to increment the level of capacity at the North-South link other measures should be investigated.

Q2: Do you have any comments on the planned implementation methods for this first option?

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Q3: Are you in favour of the option of priority allocation of North-South link capacity for large natural gas intensive plants situated in the south of France?

6. No. A group of network users should not have priority allocation of capacities, this measure would be discriminatory and against the underlining principles of the NC on CAM. If the objective was to increment the level of capacity at the North-South link other measures should be investigated.

Q4: Do you have any comments on the planned implementation methods for this second option?

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Q5: Do you have any other suggestion or remarks?

8. It would be helpful that further clarifications on how 40 GWh/d of interruptible capacity at the North-South link would be converted into firm.
9. CRE stated in the public consultation of June 2013 about the allocation of transmission capacity between GRTgaz's North zone, GRTgaz's South zone, TIGF's zone and Spain as from 1 April 2014, the following:¹

¹ CRE, "Public consultation by the French Energy Regulation Commission on the allocation of transmission capacity between GRTgaz's North zone, GRTgaz's South zone, TIGF's zone and Spain as from 1 April 2014". 5 June 2013:

<http://www.cre.fr/en/documents/public-consultations/allocation-of-transmission-capacity-between-grtgaz-s-north-zone-grtgaz-s-south-zone-tigf-s-zone-and-spain-as-from-1-april-2014/download-consultation>

The conversion of interruptible capacity into firm capacity at the North-South link is directly correlated, in summer and for up to 190 GWh/d, with gas emissions on the transmission network from the Montoir-de- Bretagne LNG terminal.

10. If the 40 GWh/d of interruptible capacity were finally converted into firm thanks to the gas emission on the transmission network from Montoir LNG terminal, then CRE would not have taken into account the responses to the Public Consultation carried out in June 2013, where *contributors were unfavourable of this proposal, considering them potentially discriminatory and ineffective.*
11. Once more, Enagás would like to reiterate its position towards the coordinated allocation of capacities between entry points (both pipeline and LNG terminals) and internal IPs: there should not be capacities at IPs reserved for specific routes. If the utilization of an entry point wants to be favoured for justified reasons, appropriate market mechanisms should be implemented.
12. This position has been previously expressed during (1) the public consultation on the commercialization of transmission capacity on the link between GRTgaz's North and South link and the GRTgaz/TIGF interface², (2) the public consultation regarding rules for the sale of transmission capacity at the link between GRTgaz the North and South zones³ and (3) the public consultation about the allocation of transmission capacity between GRTgaz's North zone, GRTgaz's South zone, TIGF's zone and Spain as from 1 April 2014.¹
13. The coordinated sale of capacity at an entry point with the capacity at the North-South link could be discriminatory towards other entry points which would not have access to a similar coordination with capacity at that IP. Moreover, it would not be consistent with the underlining principles of the NC on CAM.

² CRE, "Public consultation by the French Energy Regulation Commission on the commercialization of transmission capacity on the link between GRTgaz's North and South link and at the GRTgaz/TIGF interface". 31 July 2012. Available at:

<http://www.cre.fr/en/documents/public-consultations/commercialization-of-transmission-capacity-on-the-link-between-grtgaz-s-north-and-south-link-and-at-the-grtgaz-tigf-interface/public-consultation-by-the-french-energy-regulation-commission-on-the-commercialization-of-transmission-capacity-on-the-link-between-grtgaz-s-north-and-south-link-and-at-the-grtgaz-tigf-interface>

³ CRE, "Public consultation by the CRE on the commercialization of transmission capacity on the link between GRTgaz's North and South link and the GRTgaz/TIGF interface". 24 October 2012. Available at:

<http://www.cre.fr/documents/consultations-publiques/commercialisation-des-capacites-de-transport-a-la-liaison-entre-les-zones-nord-et-sud-de-grtgaz/consulter-la-note-technique>

14. It must be noted that the list of IPs for the expected or possible application of the CAM NC, recently published by ENTSOG, also includes the North-South link of GRTgaz.⁴ This document has been delivered by ENTSOG on request by ACER and the EC.

⁴ ENTSOG, "List of Interconnection Points for the Expected or Possible Application of the Capacity Allocation Mechanism Network Code". 29 July 2013. Available at:

http://www.entsog.eu/public/uploads/files/publications/CAM%20Network%20Code/2013/CAP368_130729_CAM%20NC%20IP%20list_ENTSOG.pdf