

Fonctionnement de la Trading Region France (TRF) et affermissement de capacités supplémentaires en hiver vers l'Espagne

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Introduction

The European Federation of Energy Traders (EFET*) thanks CRE for the opportunity to present its view on the proposed amendments to the functioning of the Trading Region France (TRF), and in particular the proposal to increase firm capacities from TRF towards Spain.

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.

Retour d'expérience après deux ans et demi de fonctionnement de la zone de marché unique

Question 1 : Avez-vous des remarques concernant le bilan après deux ans et demi de fonctionnement de la TRF ?

We agree with the general assessment made by CRE and confirm the appropriate functioning of the French hub. The liquidity growth of TRF as a single hub allows the French gas market to gain importance on the European scene.

Expérimentation de l'affermisssement des capacités vers l'Espagne au PIV Pirineos en hiver

Question 2 : Êtes-vous favorable à l'affermisssement des 60 GWh/j de capacité interruptible vers l'Espagne au PIV Pirineos pour l'hiver 2021-2022 ?

Favorable

Commentaire :

We support firming up the 60 GWh/d of currently interruptible capacity in the direction France to Spain. Firm capacities always represent a more stable option for market participants to hedge their positions and ship gas across borders. Selling firm capacities also allow the TSOs to secure more revenues from the sale of capacity. When deemed technically feasible, firm capacity is always preferable to interruptible.

Considering that the switch from interruptible to firm capacity is likely to change the price of these 60 GWh/d of capacity, we would welcome an assessment by CRE of the effects of this change on flows from France to Spain, and ultimately on social welfare at the regional level.

On a side note, we take the opportunity of this proposal to remind CRE of the operational misalignments between the French and the Spanish capacity allocation procedures: on the French side, shippers are charged based on the finally allocated over-nominated capacity, while on the Spanish side, shippers are charged based on the first initial over-nomination, regardless of whether the re-nomination leads to lower allocation or not.

Although both procedures are in line with EU legislation, this misalignment of over-nomination procedures does not incentivise flow maximisation and security of supply between the two markets. From shippers' operational perspective, we support the French methodology as being the most suitable, fair and efficient which should be

implemented on both sides of the border.

Autres évolutions aux points d'entrée et de sortie du réseau principal

Question 3 : Êtes-vous favorable à la fixation du niveau des capacités fermes en sortie du réseau au PITS Nord-Est à 124 GWh/j ?

Favorable

Commentaire :

We welcome the analysis done by Storengy, the TSOs and CRE, and support the proposal to increase firm exit capacity at the Nord-Est PITS to 124 GWh/d.

Question 4 : Êtes-vous favorable au maintien du niveau des capacités fermes en sortie du réseau au PITS Atlantique à 340 GWh/j ?

Ni favorable, ni défavorable

Commentaire :

We welcome the analysis done by Storengy, the TSOs and CRE. In the case of the Atlantique PITS, the increase of firm exit capacity potentially collides with questions of congestion management. However, the CRE consultation does not provide figures as to the actual costs (or projections) related to a possibly higher occurrence of congestions, and the benefits of increased exit capacities at the PITS. As a result, we reserve our response to this question for the time being.

Question 5 : Êtes-vous favorable à la mise en œuvre du mécanisme de netting au PIV Pirineos ?

Favorable

Commentaire :

We support the principle of a netting mechanism for capacities at Pirineos. This will allow a more optimal use of the capacity at the virtual interconnection point.

Question 6 : Êtes-vous favorable à la mise en œuvre de l'offre Use it and Buy It (UBI) dans les deux sens des flux aux PIR Virtualys, Obergailbach et Oltingue, telle que proposée par GRTgaz ?

Favorable

Commentaire :

We support the implementation of the Use it and buy it (UBI) mechanism in both flow directions at the Virtualys, Obergailbach and Oltingue interconnection points. The UBI has proved efficient at these interconnection points in the main flow direction, and we have no opposition to see it used in both directions in the future.

Maintenances

Question 7 : Êtes-vous favorable à la proposition d'augmenter le seuil des « petites maintenances » de 30 GWh/j à 90 GWh/j en octobre pour NS4 et S1 et à 120 GWh/j en octobre et novembre pour les autres limites ?

Favorable

Commentaire :

Considering that the proposal aims to avoid significant capacity restrictions this fall, we are inclined to support the GRTgaz proposal. The extension of the "small maintenance" threshold for the month of October and November should nonetheless not come to the detriment of full transparency on maintenance work and related network disruptions, given that the latter will be less predictable than if the TSOs had to announce restrictions in advance.

Liste des pièces jointes à la contribution :

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