



Consultation publique de la CRE relative à la commercialisation des capacités de transport entre les zones Nord de GRTgaz, Sud de GRTgaz, TIGF et l'Espagne disponibles à compter du 1er avril 2014

Enagás comments

26th June 2013

1. Executive Summary

1. Enagás welcomes CRE's opportunity to contribute to the public consultation on the commercialization of capacities between GRTgaz North, GRTgaz South, TIGF and Spain.
2. If the allocation mechanisms introduced by CRE at this stage are not fully in line with the CAM NC, then, **those mechanisms should not have a duration longer than the binding date of implementation of the CAM NC** (i.e November 2015). In particular, specific mechanisms should not be introduced to favour the utilization an entry point, in this is the case appropriate market mechanisms should be implemented.
3. Enagás would like to reiterate its position towards the **coordinated allocation of capacities between LNG terminals and internal IPs** expressed during previous public consultations.
4. The coordinated sale of capacity at Montoir 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.
5. As regards the **booking platform**, at this stage Enagás has not announced any formal decision to join any booking platform. As it has been stated in several for a by Enagás, NRAs must recognize the costs of joining the platform, as has been the case to date of all TSOs that have joined Prisma.
6. Enagás considers that the allocation of the **auction premium** should be discussed with the adjacent NRA, in particular if the auction premium is used to invest.
7. Having said this, Enagás strongly believes that if there is a significant auction premium at an IP, then this premium should be used to finance investments at that IP.

2. **Questions**

2.1 Allocation des capacités à la liaison Nord-Sud

Q1: Partagez-vous le besoin de visibilité exprimé en Concertation Gaz ? Considérez-vous que la durée de quatre ans envisagée par la CRE pour les capacités Nord-Sud est adéquate ?

8. If the allocation mechanisms introduced by CRE at this stage are not fully in line with the CAM NC, then, those mechanisms should not have a duration longer than the binding date of implementation of the CAM NC (i.e November 2015). In particular, specific mechanisms should not be introduced to favour the utilization an entry point.

Q2: Etes-vous en faveur d'une allocation au prorata des engagements de livraison physique pour le produit semestriel de recalage à compter du 1er avril 2014 à la liaison Nord-Sud?

9. Enagás does not have any preferred mechanism to allocate capacities between GRTgaz North and South as long as it is consistent with the allocation of capacities between Spain and France.
10. As regards the tariff for the quarterly product, Enagás considers that the reserve price for quarterly should not be proportional to the annual tariff. Both long-term and short-term reserved prices should be such that ensure the recovery of the allowed revenues of the TSOs and do not jeopardise the revenue adequacy of the system.
11. Enagás considers that multipliers fixing short-term pricing should always be greater than 1, in particular in uncongested systems.
12. Besides, summer and winter capacities should not be priced equally, tariffs should reflect gas flow seasonality patterns.

Q3: Etes-vous favorable aux modalités de commercialisation envisagées ?

13. -

Q4: Etes-vous favorable aux règles d'allocation proposées par la CRE pour la commercialisation des capacités disponibles à compter du 1er octobre 2014 ?

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Q5: Etes-vous favorable à la règle de limitation des demandes individuelles au tiers de la capacité commercialisée ?

15. -

Q6: Etes-vous favorable à la proposition de la CRE de commercialiser en octobre 2013, les capacités disponibles à compter du 1^{er} octobre 2014 ?

16. -

Q7: Que pensez-vous de la proposition d'Elengy ? Que pensez-vous de la proposition de GRTgaz ? Etes-vous favorable à la proposition de réserver 50 GWh/j de capacités interruptibles sous forme de produits mensuels pour mettre en oeuvre la proposition d'Elengy ?

17. 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.
18. Enagás would like to reiterate its position towards the coordinated allocation of capacities between LNG terminals and internal IPs expressed during the public consultation on the commercialization of transmission capacity on the link between GRTgaz's North and South link and the GRTgaz/TIGF interface¹ and the public consultation regarding rules for the sale of transmission capacity at the link between GRTgaz the North and South zones.²
19. The coordinated sale of capacity at Montoir 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 is not consistent with the underlying principles of the NC on CAM.
20. The coordinated allocation of capacity at Montoir and at the North-South link has been established without studying all possible coordinated allocations. The concern raised by Enagás that this creates an undue discrimination from one

¹ 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:

<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>

² 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:

<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>

entry point to another has not been analysed, or the absence of discrimination justified.

21. Note that by 2015 there will be a single region including TIGF and GRTgaz South, and the IPs with Spain and Fos terminals will be entry points for this region, which could be of a trading-region type (according to CEER's Vision for a European Gas Target Model published on 1st December 2011, gas can be transported between the trading region and end-user zones without constraints).³
22. As regards GRTgaz's proposition, Enagás believes that if a proportion of the revenues from the auction are redistributed between users of Montoir LNG terminal it will create distortions among users as well as undermine auctions.

Q8: Etes-vous favorable aux règles d'allocation envisagées par la CRE pour l'allocation des capacités Sud vers Nord ?

23. See question 2.

Q9: Pensez-vous que les capacités interruptibles consacrées au couplage doivent être maintenues à compter du 1er avril 2014 ?

24. –

2.2 Allocation des capacités au PIR Midi

Q10: Etes-vous favorable aux règles d'allocation proposées par la CRE pour les capacités au PIR Midi à compter du 1er avril 2014 ?

25. See question 2.

2.3 Allocation des capacités à l'interface entre TIGF et l'Espagne

Q11: Etes-vous favorable aux règles d'allocation envisagées par la CRE pour les capacités à compter du 1er avril 2014 à Larrau et à Bariatou ?

26. At this stage Enagás has not announced any formal decision to join any booking platform. As it has been stated in several for a by Enagás, NRAs must recognize the costs of joining the platform, as has been the case to date of all TSOs that have joined Prisma.

³ CRE, Délibération de la CRE du 19 juillet 2012 portant orientations sur l'évolution des places de marché de gaz en France:

<http://www.cre.fr/documents/deliberations/orientation/evolution-des-places-de-marche-de-gaz-en-france/consulter-la-deliberation>

27. Enagás and TIGF are working on an early implementation of the CAM NC for capacities as from October 2014. Enagás has no objection of selling all the available capacity from Spain to France through quarterly products, taking into account the available capacity is just 11% of the technical capacities, as long as the rules are in line with the CAM NC. However, it is worth noting that this possibility of selling more than 10% has not been discussed between Enagás and TIGF so Enagás cannot adopt any formal position at this stage.
28. Enagás and TIGF have envisaged the creation of a VIP at the same time as the early implementation of the CAM NC and the introduction of auctions (i.e. as from October 2014).

2.4 Modalités de gestion des excédents de recettes en cas d'allocation aux enchères

Q12: Partagez-vous l'analyse défavorable de la CRE sur le reversement des excédents de recettes d'enchères au CRCP ?

29. See question 13

Q13: Partagez-vous l'analyse défavorable de la CRE sur le reversement des excédents dans un compte régulé de financement des investissements ?

30. Enagás considers that the allocation of the auction premium should be discussed with the adjacent NRA, in particular if the auction premium is used to invest.
31. Having said this, Enagás strongly believes that if there is a significant auction premium at an IP, then this premium should be used to finance investments at that IP.

Q14: Etes-vous favorable à ce que les excédents de recette à la liaison Nord-Sud soient intégralement redistribués, sur une base annuelle, aux expéditeurs livrant les consommateurs du sud de la France ?

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Q15: Préférez-vous une redistribution proportionnelle aux capacités aval souscrites ou aux volumes livrés ?

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Q16: Etes-vous favorable à ce que les excédents de recettes de TIGF et de GRTgaz soient mis en commun à compter du 1er avril 2015 ?

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