

PC_2024_G_03 Public consultation on CAM NC revision

Fields marked with * are mandatory.

Identification

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*** Name of organisation / company**

IFIEC: International Federation of Industrial Energy Consumers

*** Type of organisation / company**

- TSO and their associations
- DSO and their associations
- shippers/traders and their associations
- civil society organisations
- national regulatory authorities
- other national competent authorities
- other

*** Please specify "other"**

Interest group

*** Country**

- EU-27
- Other

*** Please specify the country**

- AT - Austria
- BE - Belgium

- BG - Bulgaria
- HR - Croatia
- CY - Cyprus
- CZ - Czechia
- DK - Denmark
- EE - Estonia
- EU - European Union, for associations covering all EU
- FI - Finland
- FR - France
- DE - Germany
- EL - Greece
- HU - Hungary
- IE - Ireland
- IT - Italy
- LV - Latvia
- LT - Lithuania
- LU - Luxembourg
- MT - Malta
- NL - Netherlands
- PL - Poland
- PT - Portugal
- RO - Romania
- SK - Slovak Republic
- SI - Slovenia
- ES - Spain
- SE - Sweden

Data protection

ACER will process personal data of the respondents in accordance with [Regulation \(EU\) 2018/1725](#), taking into account that this processing is necessary for performing ACER's consultation tasks. More information on data protection is available on [ACER's website](#) and in [ACER's data protection notice](#).

ACER will not publish personal data.

Consent to the processing of personal data

Your personal data may be processed by the Agency.

Please refer to [privacy statement](#) to learn about such processing and your rights.

I hereby consent that my contact details, as referred within the [ACER Data Protection Notice on External Webinars / Online Events](#), will be used by the Agency to send me an [invitation to the technical workshop on 9 June 2024](#).

Confidentiality

Following this consultation, ACER will make public:

- the number of responses received;
- company names, unless they should be considered as confidential;
- all non-confidential responses; and
- ACER's evaluation of responses. In the evaluation, ACER may link responses to specific respondents or groups of respondents.

You may request that the name of your company or any information provided in your response is treated as confidential. To this aim, you need to explicitly indicate whether your response contains confidential information.

You will be asked this question at the end of the survey.

I have read the information on data protection and confidentiality provided in this section.

How to navigate through the survey

This consultation is a 'policy consultation', which explores further the amendment proposals to be considered, building on ACER's scoping activity as well as on the Commission's invitation to submit reasoned proposals on revising the CAM NC.

The consultation is based on the present policy paper that introduces issues as well as improvement options, and asks stakeholders for their views and concrete proposals that will guide ACER further in making amendment proposals. Stakeholders are invited to share their technical reflections as well as concrete text proposals for amending CAM NC provisions.

The consultation consists of a **survey** and a **technical workshop** (by invitation only). **Only the participants to the survey will be invited to the technical workshop** as the objective of the workshop is to discuss and clarify further the responses to the survey.

Respondents should read the policy paper before completing the survey. The survey questions follow the structure of the policy paper. Each part of the survey corresponds to a chapter in the policy paper. Sub-chapter references are provided in the survey to facilitate navigation back to the relevant part of the policy paper.

For a smoother experience, we recommend that you keep the policy document open while you complete the survey.

When responding to the questions, consider that the network code harmonises the rules that are essential for efficient functioning of the internal market.

Please use the contact form if you have any questions.

Chapter 1: Maximising the offer of firm capacity

This section deals with maximising the offer of firm capacity in accordance with *Article 6* of the CAM NC. We kindly ask that you read **Chapter 1** of the policy paper first in order to provide a reasoned response to the questions set out below.

1.1 Reporting on the system integrity margin

Please refer to chapter 1.2.1 in the policy paper

1.1 How is the 'system integrity margin' determined in your system? Please include a description of the elements considered. *[question addressed primarily to TSOs]*

By monitoring and maintaining an adequate 'system integrity margin', TSOs ensure the overall stability and security of their gas network.

1800 character(s) maximum

1.2 How could the system integrity margin be reported (e.g. as a percentage of capacity, probability of failure...) in a way that gives clarity on the physical capability of the system, the calculated technical capacity (which has commercial nature) and the relationship between them?

1800 character(s) maximum

1.3(a) Do you consider this information should be made available to neighbouring TSOs, to regulatory authorities, or market participants?

More than one option can be selected.

- neighbouring TSOs
- regulatory authorities
- market participants

1.3(b) Please explain why.

1800 character(s) maximum

Yes. IFIEC Europe welcomes making this information publicly available as it increases transparency and transparency turned out to be key for development of liquid natural gas markets.

1.2 Reporting on the joint method for calculating and maximising capacity

Please refer to chapter 1.2.2 in the policy paper

Joint method for capacity calculation and maximisation – capacity calculation process

1.4 Which steps in the capacity calculation process would you find essential to facilitate your contribution as a concerned party (e.g., market participant, regulatory authority, TSO)?

The capacity calculation process would inform you about key steps and timelines, e.g. when and how to

provide your input. It could take the form of a process diagram. You may refer to the generic example in Figure 2 in the paper.

1800 character(s) maximum

IFIEC Europe, representing large natural gas consumers, sees the mathematical model (especially the assumptions made and a numerical example calculation) as well as the scenarios used (including expected future flows) as essential for end users to contribute to this process.

1.5(a) Should the (same) information on the capacity calculation process be available to market participants, to concerned TSOs and concerned regulatory authorities?

More than one option can be selected.

- concerned TSOs
- concerned regulatory authorities
- market participants

1.5(b) Please explain why.

1800 character(s) maximum

Yes, as making this information publicly available increases transparency and transparency turned out to be key for development of liquid natural gas markets.

Joint method for capacity calculation and maximisation – capacity calculation steps

1.6 Which information on calculation steps would you find essential to facilitate your understanding of how capacity is maximised (e.g., a mathematical description of each calculation step with a quantitative explanation, or a qualitative explanation that provides a more descriptive understanding, a simplified capacity calculation model)?

1800 character(s) maximum

All calculation steps with quantitative explanations / calculation examples would facilitate the understanding of end users on how capacity is maximized. The explanations and calculations should be presented at a transparent level where end users can understand the outcomes and deduct the process coming to these outcomes.

1.7(a) Should the (same) information on the capacity calculation process be available to market participants, to concerned TSOs and concerned regulatory authorities?

More than one option can be selected.

- concerned TSOs
- concerned regulatory authorities
- market participants

1.7(b) Please explain why.

Yes, as making this information publicly available increases transparency and transparency turned out to be key for development of liquid natural gas markets.

Detailed capacity calculation steps

The following questions provide a more detailed examination of the elements that should be considered in the capacity calculation steps.

1.8 Please share your view on the role of the network topology in the capacity calculation (e.g. compressor stations, diameter of pipelines, inlet pressure etc.)?

1800 character(s) maximum

1.9 Please share your view on the role of the input assumptions (i.e. boundary conditions such as demand and supply scenarios and expected future flows) and the decision variables (the elements under control by the TSO) of the capacity calculation?

1800 character(s) maximum

1.10 Please share your view on making available numerical examples of the capacity calculation in a transmission system, e.g. in the form of a simplified capacity calculation model?

1800 character(s) maximum

Joint method for capacity calculation and maximisation – common reporting template

1.11 Would a common reporting template be useful to increase transparency of the joint capacity calculation and maximisation? Please explain why.

1800 character(s) maximum

Yes, a common reporting template would be useful to increase transparency as it makes comparisons between different TSO's easier for end users.

1.12 What are the essential elements (e.g. calculation values, methodology) to be included in such a template?

1800 character(s) maximum

The template should at least include calculation values and the methodology as well as a quantitative and qualitative explanation. The explanations and calculations should be presented at a transparent level where end users can understand the outcomes and deduct the process coming to these outcomes.

1.3 Dynamic re-calculation – frequency and timing of calculation

Please refer to chapter 1.2.3 in the policy paper

1.13 Please share your views on the benefits and drawbacks of a ‘time-dependent re-calculation’ schedule, and which option—annual re-calculation or seasonal adjustments (or even more granular) —do you find more beneficial. Please explain why.

1800 character(s) maximum

1.14 Please share your views on the benefits and drawbacks of ‘occasional re-calculation’ triggered by specific events, and on which events would require a re-calculation. Please explain why.

1800 character(s) maximum

1.15(a) Which approach do you prefer?

- Time-dependent re-calculation
- Occasional re-calculation
- No preference

1.15(b) Please explain why.

1800 character(s) maximum

IFIEC does not have the expertise to judge which approach should be preferred. With regard to the ‘specific events’ we can state that one cannot be prepared for every event that possibly might occur. Examples: the consequences of Covid, the geopolitical events in Ukraine and the sabotage of Nordstream. There has to be a trade off between the events we can take into account because of their possible opportunity (occurrence) and effect.

1.16 Considering the improvement options discussed in this chapter, do you have concrete proposals to amend the CAM NC? Please specify your proposed revisions to the legal text.

You can submit your response directly in the provided text box. Alternatively, you can upload a document in Word or PDF format in the final section.

Please ensure that all your proposed amendments are in one document, clearly identifying each article and paragraph affected. It would be helpful if you could include the existing text of the Network Code and highlight your proposed changes using track changes or a similar feature.

1800 character(s) maximum

Chapter 2: Maximising the offer of interruptible capacity

This section deals with maximising the offer of interruptible capacity in accordance with *Article 32* of the CAM NC.

We kindly ask that you read **Chapter 2** of the policy paper first in order to provide a reasoned response to the questions set out below.

2.1 Options to improve the offering of interruptible capacity

Please refer to chapter 2.2 in the policy paper

2.1 Which information would you find essential to understand how the interruptible capacity is determined and maximised, how the system can manage those volumes and what is the probability of interruption?

The CAM NC does not provide guidance on the amount of interruptible capacity that TSOs can offer to the market. Article 32(1) of the CAM NC only provides that yearly, quarterly and monthly interruptible capacity can be offered.

1800 character(s) maximum

Information on not nominated firm capacity as well as an historical statistical overview on interruptions is key. Insights are necessary to be able to make the best educated guess.

2.2 Building on your response to the above question, would there be any specificities to determining and maximising interruptible capacity in the case of virtual reverse flow?

1800 character(s) maximum

2.3(a) Which of the listed metrics do you consider more appropriate for explaining how the level of interruptible capacity products has been determined?

- Option 1 - set the limit to the technical capacity level
- Option 2 - set the limit to the sum of the technical capacity and the system integrity margin
- Option 3 - set the limit to the maximum between technical capacity and the recorded maximum physical flow in the last 'x' months
- Option 4 - base the limit on the probability of interruption

2.3(b) Please explain why.

1800 character(s) maximum

Option 3 as it represents more the current situation in the network. But we recommend that this option should also consider already existing nominations for the next days.

2.4 Considering the improvement options discussed in this section, do you have concrete proposals to amend the CAM NC? Please specify your proposed revisions to the legal text.

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1800 character(s) maximum

2.2 Bundling of interruptible products

Please refer to chapter 2.2 in the policy paper

2.5 Which merits and drawbacks do you see in mandatory bundling of interruptible capacities?

A further improvement to maximising the offer of interruptible capacity could be to bundle it at interconnection points. Bundling would cover firm-interruptible combinations as well as interruptible-interruptible combinations.

1800 character(s) maximum

Bundling of interruptible capacity would make booking much easier and could therefore also improve the use of interruptible capacity, and hence, improve the rate of capacity being used. On the other hand, we question whether bundling should be mandatory: having it as an option might have a higher effectiveness. In the end, the purpose of CAM NC is to maximise the capacity offered to the market, and having this capacity used efficiently in facilitating the market: functioning and outcomes.

2.6 Considering the improvement options discussed in this section, do you have concrete proposals to amend the CAM NC? Please specify your proposed revisions to the legal text.

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1800 character(s) maximum

Chapter 3: Improving the offering of capacity

This section deals with improving the offering of capacity. We kindly ask that you read **Chapter 3** of the policy paper first in order to provide a reasoned response to the questions set out below.

3.1 Improving the efficiency of ascending-clock auctions

Please refer to chapter 3.2.1 in the policy paper

3.1 Please provide your views on the advantages and drawbacks of Option 1, Option 2(a), Option 2(b) and Option 3 to amend the termination rule in Article 17(22)?

Article 17(22) of the CAM NC sets out the termination rule which provides that “if an ascending clock auction has not ended by the scheduled starting point (according to the auction calendar) of the next auction for capacity covering the same period, the first auction shall close and no capacity shall be allocated”.

	Advantages	Drawbacks
Option 1: termination rule of article 17(22) is amended to explicitly apply to the auction for the following capacity product, as is the case now (excluding additional UPA auctions)		
Option 2(a): provide that the ACA auction needs to close before the scheduled date of the first UPA auction		
Option 2(b): provide that the ACA auction needs to close before the scheduled date of the last UPA auction		
Option 3: termination rule of article 17(22) is amended to close the ACA auction by using an UPA mechanism in the last round of the ACA, starting the UPA using the price level of the last round of the ACA process.		

3.2(a) Which option to amend the termination rule in Article 17(22) do you prefer?

Maximum 1 selection(s)

- Option 1
- Option 2(a)
- Option 2(b)
- Option 3

3.2(b) Please explain why.

1800 character(s) maximum

3.3 Would you consider any other improvement for the ACA algorithm?

1800 character(s) maximum

3.4 Considering the improvement options discussed in this section, do you have concrete proposals to amend the CAM NC? Please specify your proposed revisions to the legal text.

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1800 character(s) maximum

3.2 Additional auction dates for yearly, quarterly and monthly capacity products

Please refer to chapter 3.2.2 in the policy paper

3.5 Please share your views on ACER's proposal to complement the 17 current yearly (1), quarterly (4), and monthly (12) auctions with additional auctions for the respective capacity products.

1800 character(s) maximum

3.6 Do you agree that the additional UPA auctions should be launched using the regulated tariff as the reserve price? Please explain.

1800 character(s) maximum

3.7 Do you agree that only the yearly/quarterly/monthly product for the front year/ front quarter/ front month should be offered via subsequent UPA auctions? Please explain.

1800 character(s) maximum

3.8 Do you agree that a weekly frequency would be a suitable option for additional auctions?

1800 character(s) maximum

If a weekly frequency can contribute to shippers' opportunities to take and cash market opportunities, it should be welcomed.

3.9 Are the improvement options feasible in terms of implementation cost and time? Please explain.

1800 character(s) maximum

3.10 Considering the improvement options discussed in this section, do you have concrete proposals to amend the CAM NC? Please specify your proposed revisions to the legal text.

You can submit your response directly in the provided text box. Alternatively, you can upload a document in Word or PDF format in the final section.

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1800 character(s) maximum

3.3 Advanced booking opportunities for monthly capacity products

Please refer to chapter 3.2.2 in the policy paper

3.11 Please share your views on the advantages and drawbacks of Option 1 (independent ACA auction on 12 monthly auction dates) and Option 2 (independent ACA auctions on 4 dates)?

ACER proposes to apply to monthly products the same logic which currently applies to the offer of quarterly products. Namely, all monthly products within a given quarter would be auctioned in independent auctions before the start of the quarter and during the quarter, in order to respect the cascading principle.

	Advantages	Drawbacks
Option 1 (12 ACA auction dates, additional weekly UPA auctions for the forthcoming month only)		
Option 2 (4 ACA auction dates, additional weekly UPA auctions for for each month until the end of a given quarter)		

3.12(a) Which option for enabling advance booking of monthly products do you prefer?

- Option 1
- Option 2
- No preference

3.12(b) Please explain why.

1800 character(s) maximum

3.13 Are the improvement options feasible in terms of implementation cost and time? Please explain.

1800 character(s) maximum

3.14 Considering the improvement options discussed in this section, do you have concrete proposals to amend the CAM NC? Please specify your proposed revisions to the legal text.

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1800 character(s) maximum

3.4 Market participants should be able to book capacity products that better match their commodity contracts

Please refer to chapter 3.2.3 in the policy paper

3.15 Please share your views on the advantages and drawbacks of Option 1, Option 2, Option 3 and Option 4. Please explain.

	Advantages	Drawbacks
Option 1 (New standard capacity product 'Balance of month')		
Option 2 (Offer all daily products in one auction until the end of the month - excluding the day-ahead product for the front day)		
Option 3 (Offer all daily products in individual auctions until the end of the month)		
Option 4 (Offer daily products individually up to 7-days ahead, until the end of the month)		

3.16(a) Which option do you prefer?

- Option 1 (New standard capacity product 'Balance of month')
- Option 2 (Offer all daily products in one auction until the end of the month)
- Option 3 (Offer all daily products in individual auctions until the end of the month)
- Option 4 (Offer daily products individually up to 7-days ahead, until the end of the month)
- No preference

3.16(b) Please explain why.

1800 character(s) maximum

Option 3 or 4 as this provides the highest flexibility for the market participants.

Question 3.17 is to the particular attention of booking platform operators:

3.17 Please share your views on the feasibility of Option 1, Option 2, Option 3 and Option 4, particularly in terms of implementation costs and time?

	Feasibility, particularly in terms of implementation costs and time
<p>Option 1 (New standard capacity product 'Balance of month')</p>	
<p>Option 2 (Offer all daily products in one auction until the end of the month)</p>	
<p>Option 3 (Offer all daily products in individual auctions until the end of the month)</p>	
<p>Option 4 (Offer daily products individually up to 7-days ahead, until the end of the month)</p>	



3.18 Considering the improvement options discussed in this section, do you have concrete proposals to amend the CAM NC? Please specify your proposed revisions to the legal text.

You can submit your response directly in the provided text box. Alternatively, you can upload a document in Word or PDF format in the final section.

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1800 character(s) maximum

3.5 Evaluation of set-aside rule with more opportunities to book capacity

Please refer to chapter 3.2.4 in the policy paper.

3.19 Do you agree with ACER's proposal to make more explicit that regulatory authorities may approve, on a case-by-case basis, higher percentages, or a specific split per capacity product? (Article 8 of the CAM NC)

1800 character(s) maximum

We lack the information for judging whether there is substantial evidence in – the need of - creating this opportunity.

3.20 How would you amend the CAM NC to reflect this? Please specify your proposed revisions to the legal text.

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Please ensure that all your proposed amendments are in one document, clearly identifying each article and paragraph affected. It would be helpful if you could include the existing text of the Network Code and highlight your proposed changes using track changes or a similar feature.

1800 character(s) maximum

3.5 Options to improve the offering of interruptible capacity products

Please refer to chapter 3.2.5 in the policy paper.

3.21(a) Please share your view on the advantages and drawbacks of removing the conditions under which interruptible capacity can be offered. Please explain.

1800 character(s) maximum

3.21(b) What is your preference?

- Retaining the conditions as they currently are applied
- Removing the conditions
- No preference

3.22(a) Please share your view on the advantages and drawbacks of using UPA for allocating all (or selected) interruptible capacity products? Please explain.

1800 character(s) maximum

3.22(b) What is your preference?

- Retaining ACA as they are currently applied
- Changing to UPA (for all or selected products)
- No preference

3.23 Considering the improvement options discussed in this section, do you have concrete proposals to amend the CAM NC? Please specify your proposed revisions to the legal text.

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1800 character(s) maximum

3.6 Publication of the auction calendar

Please refer to chapter 3.2.6 in the policy paper.

3.24 Do you agree that ENTSOG should publish the auction calendar by 1st January of year Y for auctions taking place during the period of July Y until June Y+1?

1800 character(s) maximum

Yes, as it gives shippers a longer period of time to anticipate and take decisions on bookings.

3.25 Considering the improvement options discussed in this section, do you have concrete proposals to amend the CAM NC? Please specify your proposed revisions to the legal text.

You can submit your response directly in the provided text box. Alternatively, you can upload a document in Word or PDF format in the final section.

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1800 character(s) maximum

Chapter 4: Improving the offering of capacity: adapting the rules to the market

This section deals with with the adapt-to-market procedure (to increase more flexibility inside CAM NC).

We kindly ask that you read **Chapter 4** of the policy paper first in order to provide a reasoned response to the questions set out below.

Please refer to chapter 4.2 in the policy paper.

4.1 Do you agree that the parameters and rules listed in the policy paper would benefit from more flexibility in the CAM NC? Please explain why or why not.

- a. auction dates
- b. number of auctions
- c. frequency of auctions
- d. duration of bidding rounds
- e. auction algorithm to be applied (whether to use ACA or UPA)

ACER sees the need to introduce in the CAM NC a possibility to adapt some of the parameters and rules of the capacity allocation process so that they are always in line with the changing market context and needs of the market participants.

1800 character(s) maximum

4.2 Do you see any other parameters or rules of the CAM NC which should be more flexible and able to be modified depending on the market conditions? Please list them and explain why and how.

1800 character(s) maximum

4.3 Should there be a single ‘adapt-to-market’ process for deciding whether to modify these rules and parameters, or should certain parameters or rules require specific processes? Please explain.

1800 character(s) maximum

4.4 How to design the ‘adapt-to-market’ process to make it simple, practical and time-efficient while, at the same time, sufficiently transparent, predictable and ensuring sufficient stakeholder involvement?

1800 character(s) maximum

4.5 Do you see any risks with devising such a process (e.g. insufficient certainty, insufficient regulatory oversight) and if yes, how would you address them?

1800 character(s) maximum

4.6 Considering the improvement options discussed in this chapter, do you have concrete proposals to amend the CAM NC? Please specify your proposed revisions to the legal text.

You can submit your response directly in the provided text box. Alternatively, you can upload a document in Word or PDF format in the final section.

Please ensure that all your proposed amendments are in one document, clearly identifying each article and paragraph affected. It would be helpful if you could include the existing text of the Network Code and highlight your proposed changes using track changes or a similar feature.

1800 character(s) maximum

Chapter 5: Improving the incremental capacity process

This section deals with with the incremental capacity process.

We kindly ask that you read **Chapter 5** of the policy paper first in order to provide a reasoned response to the questions set out below.

Streamlining the incremental capacity process

Please refer to chapter 5.2 in the policy paper.

5.1 Please share your views on the advantages and drawbacks in charging administrative fees to avoid speculative expressions of interest? Do you have other ideas regarding assuring credibility of demand expressions?

The introduction of administrative fees for the placement of non-binding interest, subject to regulatory approval, already exists as a possibility in the current rules. This measure could be more widely adopted, achieving a balance between charging process costs and not unduly discouraging shippers from expressing their interest.

1800 character(s) maximum

Speculative expressions of interest should be avoided as they might lead to misleading price signals and administrative fees could be a solution to avoid such behavior and effects. However, IFIEC in general is against charging administrative fees. The question is than what the measure could or will solve and hence contribute to prevent speculative behaviour.

5.2 Please share your views on the advantages and drawbacks of the options for adjusting the frequency of the process? Which is your preferred option?

1800 character(s) maximum

5.3 Which elements of the process should remain fully harmonised? How would you simplify the existing process?

1800 character(s) maximum

5.4 Do you have any other ideas on how to streamline the incremental capacity process? Please explain the possible advantages and drawbacks of your ideas.

1800 character(s) maximum

5.5 Considering the improvement options discussed in this chapter, do you have concrete proposals to amend the CAM NC? Please specify your proposed revisions to the legal text.

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1800 character(s) maximum

Chapter 6: Further amendment proposals

This section deals with topics for further discussion on proposals to be considered for amendment

We kindly ask that you read **Chapter 6** of the policy paper first in order to provide a reasoned response to the questions set out below.

6.1 Implicit allocation: ensuring case-by-case assessment where implicit allocation is considered

Please refer to chapter 6.1 in the policy paper.

6.1 Do you agree that, for new procedures, the concerned regulatory authorities should jointly assess the internal market impacts on a case-by-case basis before deciding, in coordination, to apply an implicit allocation mechanism? Please explain your reasoning.

1800 character(s) maximum

It is questioned to what extent IA mechanisms contribute in realizing benefits for the internal markets.

6.2 Which impacts would you deem essential to be assessed before deciding on the application of an implicit allocation mechanism?

1800 character(s) maximum

Reasoning is key: substantiation with arguments. IFIEC is reluctant here: it must be ensured that such a measure does not have a detrimental effect on the market functioning, and more specific: end users.

6.3 Considering the improvement options discussed in this section, do you have concrete proposals to amend the CAM NC? Please specify your proposed revisions to the legal text.

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1800 character(s) maximum

6.2 Application of the CAM NC to interconnection points, entry points from and exit points to third countries

Please refer to chapter 6.2 in the policy paper.

6.4 Please provide your view on possible reasons for an entry point from and/or exit point to third countries to be derogated from the application of the CAM rules? Please explain.

Article 70(2)(d) of the recast gas Regulation provides that the network codes and guidelines shall apply to all interconnection points within the Union and entry points from and exit points to third countries. Article 70 (3) provides a possibility for the regulatory authorities to submit a request to the Commission for a temporary derogation from the application of the network codes and guidelines at entry points from and exit points to third countries.

1800 character(s) maximum

6.5 Please provide your view on introducing the possibility for regulatory authorities to apply CAM rules to distribution points that are part of an entry-exit system. Please explain.

1800 character(s) maximum

6.6 Do you have any other comments on the scope of application of the CAM NC?

1800 character(s) maximum

6.3 Default procedure for selecting a joint booking platform

Please refer to chapter 6.3 in the policy paper.

6.7 Please provide your view on adding to the CAM NC an annex setting out a default procedure for jointly selecting a booking platform. Please explain.

1800 character(s) maximum

6.8 Should the maximum validity of designations of booking platforms by the regulatory authorities be extended from 3 years (currently) to 5 years?

1800 character(s) maximum

6.9 Considering the improvement options discussed in this section, do you have concrete proposals to amend the CAM NC? Please specify your proposed revisions to the legal text.

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1800 character(s) maximum

6.4 Within day auctions: modifying timings of WD24

Please refer to chapter 6.4 in the policy paper.

6.10 Do you agree with the proposal to move earlier the closing of the (first) WD24 auction?

1800 character(s) maximum

6.11 Do you agree with introducing additional auction rounds for WD24 after the initial one?

6.12 How would you amend the CAM NC to modify the WD24 auction? Please specify your proposed revisions to the legal text.

You can submit your response directly in the provided text box. Alternatively, you can upload a document in Word or PDF format in the final section.

Please ensure that all your proposed amendments are in one document, clearly identifying each article and paragraph affected. It would be helpful if you could include the existing text of the Network Code and highlight your proposed changes using track changes or a similar feature.

1800 character(s) maximum

6.5 Capacity conversion model

Please refer to chapter 6.5 in the policy paper.

6.13(a) Do you agree with ACER's view that no further harmonisation of the conversion model is needed?

According to Article 21(3) of the CAM NC, TSOs must offer a capacity conversion service for unbundled capacity based on the conversion model developed by ENTSOG.

- I agree (no amendment needed)
- I disagree (amendment would be beneficial)
- No preference / not relevant for my organisation

6.13(b) In case you do not agree, please share your detailed proposals for amending the CAM NC.

You can submit your response directly in the provided text box. Alternatively, you can upload a document in Word or PDF format in the final section.

Please ensure that all your proposed amendments are in one document, clearly identifying each article and paragraph affected. It would be helpful if you could include the existing text of the Network Code and highlight your proposed changes using track changes or a similar feature.

1800 character(s) maximum

Chapter 7: Reflections on aligning the CAM NC with the decarbonisation package

This sections deals with the reflections on the new regulatory elements introduced in the decarbonisation package. In answering the other questions, we hope you have kept these elements in mind.

Please refer to the **Background chapter** and **Chapter 7** in the policy paper.

ACER invites your further reflections on aligning the CAM NC with the decarbonisation package, not already shared in the preceding questions in this consultation.

7.1 Please share your views on how the capacity allocation rules might align with the decarbonisation objectives, potential capacity decrease and its management.

1800 character(s) maximum

IFIEC advises to develop a phase out plan for the natural gas system. End users will decarbonize their energy and feed stock use, which inevitably leads to a point where a limited amount of users have to take up the gas transport bill with unaffordable tariffs for gas usage.

7.2 Please share your views on how certain allocation configurations might maximise the use of the network in relation to security of supply considerations.

1800 character(s) maximum

The 2022 gas crisis shows some evidence that gasflows change, and well as capacity bookings and transport directions. In this, allocation configurations should be taken into account together with cost allocation, tariffication and balancing rules.

7.3 Please share your views on how the rules in the code interact with and facilitate regional cooperation initiatives and market mergers.

1800 character(s) maximum

7.4 Please signal essential interactions between possible amendments to the CAM NC and other network codes and guidelines.

1800 character(s) maximum

Other comments and file upload

Other comments

8.1 Do you have any other comments on ACERs process on the revision of the Network Code you wish to share with us?

1800 character(s) maximum

8.2 We value your input on the survey's design. Kindly share your thoughts on how the survey is structured and any suggestions you may have for improvement.

1800 character(s) maximum

File upload - amendment proposals

You can upload your proposed amendments (in Word or PDF) here.

Please ensure that all your proposed amendments are in one document, clearly identifying each article and paragraph affected. It would be helpful if you could include the existing text of the Network Code and highlight your proposed changes using track changes or a similar feature.

Maximum file size is 1 MB. If your file is bigger, please use the functional mailbox: gas_cam_nc@acer.europa.eu.

Question on confidentiality

*** Does your submission contain confidential information?**

- Yes
 No

Useful links

[Policy paper on the CAM NC revision \(https://www.acer.europa.eu/sites/default/files/documents/Official_document/Public_consultations/PC_2024_G_03/CAM_NC_revision_policy_paper_2024.pdf\)](https://www.acer.europa.eu/sites/default/files/documents/Official_document/Public_consultations/PC_2024_G_03/CAM_NC_revision_policy_paper_2024.pdf)

Contact

[Contact Form](#)

