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# Facilitating the implementation of aspects of the Capacity Allocation Mechanisms Network Code in Great Britain

*Submission by GDF SUEZ SA*

**8 August 2014**

I. Introduction :

Thank you for the opportunity to comment on your consultation with regard to the implementation of aspects of the Capacity Allocation Mechanisms Network Code in Great Britain. GDF SUEZ wishes to congratulate you on the level of clarity and detail provided. Please find our response below which is not confidential.

II. Answers to the consultation :

In all, GDF SUEZ supports your proposals. However, it appears that the following structuring points for GDF SUEZ have not been tackled in this consultation :

a) Tariffs and the shorthaul tariff :

GDF SUEZ is waiting for some clarification on tariffs especially the future of commodity charges. In addition, the shorthaul tariff is a key subject especially for the UKCS pipe arriving at Bacton. Shorthaul is key to avoid the question of building a flange bypassing NGG, that may orientate all discussions given the importance of the shorthaul for some major arbitrages. Considering the current discussions about the evolution of Bacton interconnection point with CAM implementation, and the future Tariff Network code, GDF SUEZ is strongly in favour of maintaining the current shorthaul service and would appreciate to have clarification and confirmation of this maintaining as a priority.

b) the treatment of the unmatched capacities :

How our current unmatched capacities are going to be dealt with the implementation of bundled products? How are we going to be able to book matching unbundled capacities when we need it and not to be forced to book them as a bundle product when there is no need to do so ? Are we going to be able to terminate the mismatched capacities contract ? GDF SUEZ would like that National Grid offer the possibility to market several unbundled capacity products (yearly, quaterly, monthly, day-ahead and within-day) at Bacton along with bundled capacities, at least as long as shippers have Long Term contracts within the 2 interconnectors. If not possible, GDF SUEZ will ask for terminate of capacities in IUK and BBL.

c) the IT modifications :

GDF SUEZ would like to have more visibility on IT changes (impacts onto GEMINI and timetable) as soon as possible.

d) The IP Capacity Auctions :

i. transitional period :

In addition, GDF SUEZ would like to draw your attention about the completeness of auction products between the UNC auctions and the CAM auctions at IP. In order to get ready in time, GDF SUEZ would like to have a timetable of all auctions with specification and reserve prices of products in advance.

ii. IP Capacity Auctions :

GDF SUEZ wishes some explanation about the mechanism of IP auctions on PRISMA and especially the list of products which will be sold in both directions. Will 2 products (NGG/IUK and NGG/BBL) be sold on PRISMA platform and after that is NGG going to sum the quantities of these two products to determine our allocation at Bacton IP or only one product (NGG / IP) will be proposed ?

e) daily Nominations at IP:

GDF SUEZ is strongly supportive of:

- double-sided nomination for bundled capacity as well as unbundled capacity
- singled-sided nomination for bundled capacity or in case of unbundled capacity if the same entity owns the capacity on both sides of the IP

Any restriction on these alternatives may really complicate the management of our nominations.

f) the implementation of an OBA:

GDF SUEZ is in favour of the implementation of an OBA at Bacton between Interconnectors and NGG that allows shippers to be allocated as nominated. We would appreciate to have some information about the ongoing discussions between Interconnectors and NGG.