

**EFET response to the REE/RTE consultation  
on the Capacity Allocation Rules for the France-Spain Interconnection for the  
intraday timeframe (IFE Rules)  
Version 4.0**

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25 July 2014

The European Federation of Energy Traders (EFET)<sup>1</sup> welcomes the opportunity to comment on the draft version 4.0 of the Capacity Allocation Rules for the France-Spain Interconnection for the intraday timeframe (IFE Rules).

Shifting the rules that govern long-term capacities to CASC's harmonised allocation rules is a positive step and in line with the Framework Guidelines.

In terms of the revised IFE Rules and the future evolution of intraday allocation arrangements, EFET would like to make the following comments:

- First, the IFE Rules mention that capacity allocation will evolve towards a continuous implicit allocation mechanism. EFET would welcome more concrete details on the intended mechanism and would encourage the parties involved to produce a roadmap for how the Intraday Target Model will be implemented.
- Second, we note that Section VI B, on the use of capacity, could be misleading, as market participants perform nominations to neither RTE nor REE for the intraday timeframe. We suggest that this section is made clearer.

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<sup>1</sup> The European Federation of Energy Traders (EFET) promotes and facilitates European energy trading in open, transparent, sustainable and liquid wholesale markets, unhindered by national borders or other undue obstacles. We currently represent more than 100 energy trading companies, active in over 27 European countries. For more information, visit our website at [www.efet.org](http://www.efet.org).