



ACER, Agency for the Cooperation of Energy Regulators
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1000 Ljubljana – Slovenia

Att: Mr Alberto Pototschnig

19 July 2018

Subject: Assignment of capacity booking platforms to EU Interconnection Points

The European Federation of Energy Traders (EFET)¹ welcomes the opportunity to comment on the subject of assigning a single platform for capacity bookings at a given interconnection point (IP). While we highlight the need for the market participants to have a one-stop-shop solution for capacity bookings across the entire internal market, we also note that such solution must be cost-efficient and non-discriminatory. At the same time we recognize the tensions that may arise at border points where two Member States disagree on the assignment of a given service provider. We would therefore like to support a neutral solution that could both help avoiding the previously mentioned disagreements and at the same time motivate the service providers to stay competitive.

The Interoperability Network Codes (INT NC) was to require the TSOs to implement common data exchange solutions that comprise the protocol, the data format and the network, altogether enabling standardized way of communication between the market participants and the system operators. The interpretations of art. 24 vary, different levels of the Common Network Operation Tool (CNOT) implementation exist. A greater degree of harmonisation has already been achieved for e.g. communication of nominations. Using the recommended communication standards have already improved the operational conditions for trading.

In this spirit we would support the use of data exchange solutions using open protocols, that would allow for the standardization of the information exchange between the network users and the service providers. The service providers would then translate the data and supply it to/from the appropriate platform in their prescribed manner. In practice, such open standard communication would facilitate a one-stop-shop for the market participants, who could communicate with a virtually unlimited number of booking platforms through a single interface. At the same time

¹ The European Federation of Energy Traders (EFET) promotes competition, transparency and open access in the European energy sector. We build trust in power and gas markets across Europe, so that they may underpin a sustainable and secure energy supply and a competitive economy. We currently represent more than 100 energy trading companies, active in over 27 European countries. For more information: www.efet.org.

the solution would help avoiding the costs of establishing connections between different systems and encourage the service providers to keep improving their platforms.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Doug Wood', with a stylized, cursive script.

Doug Wood
Chairman of the EFET Gas Committee