

PUBLIC CONSULTATION TAP DRAFT NETWORK CODE (TNC)

EFET Response
Contact person: p.lont@efet.org

COMMENTS ON THE TAP DRAFT NETWORK CODE

SECTION AND PARAGRAPH OF TNC	COMMENTS	COMMENT TO BE KEPT CONFIDENTIAL?
6.1	We do not recommend the use of TAP ad hoc booking platform unless a cost-benefit analysis proves this option suboptimal. We note that, should such a solution be chosen, the choice of selling capacity on bundled basis will create additional unnecessary complication as Desfa is using RBP and SRG Prisma.	no
6.5	Capacity booking and nomination on the commercial reverse flow are made on a point-to-point basis rather than at each individual entry or exit point which seems to be contrary general EU legislation on entry-exit system. The rationale behind this choice should be disclosed.	no
8.3	Clarification is necessary with respect to rationale of the envisioned shippers' right to put a priority order (from 1 to 20) to own	no

	nomination based on which TAP may define a curtailment merit order. Such feature should be at least accompanied by financial incentives.	
8.6	<p>While a Virtual Trading Point (VTP) is formally established within TAP, this is only accessible to physical traders (i.e. only to those shippers that have capacity in the TAP system) and only to shippers with forward capacity (East to West).</p> <p>While one would expect limited or no liquidity at the TAP VTP it is unclear why the TAP VTP should not be open pure traders.</p>	no
10	We recommend TAP to conclude relevant interconnection agreement upstream and downstream. The current code includes balance charge that will occur in case an OBA will not be in place putting an additional risk on the shippers. However due to the IN=OUT rule the shippers cannot influence and cannot control any imbalance that will be pure responsibility of TAP.	no
22.4 and 22.7	By no means consultations should be open to Registered Parties only. The same holds true for access to the Stakeholder Forum which should at least be open to industry associations.	no