CRE (Energy Regulation Commission) public consultation
on the marketing rules proposed by GRTgaz and Elengy for long term capacities released in the frame of GDF Suez's commitments.

Answers

Status: public

1. Are you favorable to the principle of successive marketing of transport capacities by entry point? If yes, are you favorable to the calendar proposed?
Etes-vous favorable au principe de commercialisations successives des capacités de transport par point d'entrée ? Si oui, êtes-vous favorable au calendrier envisagé?

We accept the proposed successive marketing and the proposed calendar.

2. Given these elements, are you favorable to the capacity allocation rule proposed by GRTgaz, taking into accounts the length of the requests? Are you favorable to the rule of same priority for the requests whose length is higher or equal to 10 years?
Compte tenu de ces éléments, êtes-vous favorable la règle d'allocation de capacités proposée par GRTgaz tenant compte de la durée des demandes ? Êtes-vous favorable à la règle de même priorité pour les demandes de durée supérieure ou égale à 10 ans ?

We do not have remarks on that issue.

3. Are you favorable to the rule of lower priority proposed by CRE for shippers holding a significant part of the firm long term capacities?
Êtes-vous favorable à la règle de moindre priorité proposée par la CRE pour les expéditeurs détenant une part significative des capacités fermes à long terme ?

We are not in favour of a rule of lower priority for shippers holding a significant part of the firm long term capacities due to the fact that this seems to be discriminatory.

4. Are you favorable to the introduction of a minimum acceptation threshold proposed by CRE in the marketing rules?
Êtes-vous favorable à l'introduction d'un seuil minimal d' « acceptation » proposé par la CRE dans les règles de commercialisation ?

We would appreciate the introduction of a minimum acceptation threshold.

5. Are you favorable to the application of the general conditions of the transporting contract of GRTgaz to the possibly unsold capacities?
Êtes-vous favorable à l'application des conditions générales du contrat d'acheminement de GRTgaz aux capacités éventuellement invendues ?

We are in favour of the application of the general conditions of the transporting contract of GRTgaz to the possibly unsold capacities.

6. Do you have other remarks on the subscription and allocation rules proposed by GRTgaz ? *Avez-vous d'autres remarques sur les règles de souscription et d'allocation proposées par GRTgaz ?*

We do not have other remarks.

7. Are you favorable to the calendar proposed by Elengy in the frame of its commitments? *Etes-vous favorable au calendrier proposé par Elengy dans le cadre des engagements ?*

Acceptable. Both deadlines (qualification deadline 26 February 2010 and deadline for submitting binding requests 3 March 2010) are tight but feasible and serve the purpose of a fast processing.

8. Are you favorable to the priorisation criteria based on the nature of the requested service? *Êtes-vous favorable au critère de priorisation sur la nature du service demandé ?*

Acceptable. The prioritisation reflects general business practice with a clear focus on duration.

9. Are you favorable to the criteria aiming at favoring the diversification of shippers on the terminal? *Êtes-vous favorable au critère destiné à favoriser la diversification des expéditeurs sur le terminal ?*

Acceptable. Diversification will act against hoarding and therefore allow a nondiscriminatory allocation process.

10. Are you favorable to the application of the ongoing capacity allocation rules publisher by Elengy to the possibly unsold capacities? *Êtes-vous favorable à l'application des règles actuelles d'allocation de capacités publiées par Elengy aux capacités éventuellement invendues ?*

Acceptable. Allocating unsold capacities "first come - first serve" seem fit and we see no harm in the non-exclusion of GDF Suez as long as the general requirements are met.

11. Do you have other remarks on the marketing procedure proposed by Elengy? *Avez-vous d'autres remarques sur la procédure de commercialisation proposée par Elengy ?*

We do not have other remarks.