

PUBLIC CONSULTATION TAP DRAFT NETWORK CODE (TNC)

Response Template

COMPANY NAME: AIGET - Associazione Italiana di Grossisti di Energia e Trader

CONTACT PERSON¹

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Would you like to keep the company name confidential? If yes, please tick the box **Yes**

Would you like to keep the contact person's details confidential? If yes, please tick the box **Yes**

COMMENTS ON THE TAP DRAFT NETWORK CODE

SECTION AND PARAGRAPH OF TNC	COMMENTS	COMMENT TO BE KEPT CONFIDENTIAL?
6.1	We would like to know why TAP choose not to use PRISMA as booking platform.	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 (commercial reverse	No.

¹ TAP is processing personal data in accordance with the General Data Protection Regulation. Please, see [here](#) more information.



	<p>capacity is available for the following combinations: Melendugno – Nea Mesimvria; Melendugno – Komotini; Nea Mesimvria – Komotini).</p> <p>While it is unclear why such differentiation is necessary, we believe it does have discriminatory implications, severely limiting the flexibility available to those shippers that do not have forward capacity.</p> <p>We therefore suggest to amend the network code allowing for point per point booking and nominations for commercial reverse flow.</p>	
8.3	<p>Clarification is necessary with respect to the envisioned shippers' right to put a priority order (from 1 to 20) to own nomination on the basis of which TAP may define a curtailment merit order. In absence of a financial incentive, it is unclear why a shipper would indicate a lower priority and accept to be curtailed before other shippers are.</p>	No.
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 shipper with forward capacity (East to West). At the same time nominations and trade notifications are required to be always in balance and may be "adjusted" by TAP when they are not.</p>	No.



	<p>As a consequence, one would expect limited or no liquidity at the TAP VTP and it is unclear how a shipper could actually end up having an imbalance.</p> <p>We suggest to amend the network code allowing trading at the TAP VTP to pure traders <u>and</u> also to physical traders.</p>	
10.3	<p>The TAP network code envisions a fully BAL compliant balancing regime with market based imbalance prices. This is an unnecessarily complex feature and it potentially exposes TAP to the market power of certain shippers.</p> <p>We therefore suggest to amend the network code replacing the envisioned balancing regime with an "IN=OUT principle based one" following the model of IUK and BBL.</p>	No.
22.4 and 22.7	<p>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.</p>	No.