Duferco Energia

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Bundesnetzagentur
Section 609
Postfach 8001
53105 Bonn

Subject: 2018-2028 Consultation NDP Gas

Dear Sirs,

Duferco Energia hereby submits its views on the draft of the security of supply alternatives which have been outlined in the BNetzA consultation workshop on July 10th, 2018 regarding the German Network Development Plan (NDP) 2018 and in subsequent market consultations.

Duferco Energia joined the NetConnect Germany Market Area in 2017 with the intention to use its transmission network both on a spot and long term basis, supporting a growing asset trading portfolio and providing flexibility and diversification to its supply sources.

From the perspective of Duferco Energia as a new shipper, the latest PRISMA auctions on a yearly and quarterly basis at Interconnection Point Wallbach – Exit present such a high level of congestion to suggest even holders of long term Transitgas capacity are struggling to match their Wallbach – Exit flow to their existing capacity, thereby in practice also preventing the possibility of new shippers participating.

Additionally, a tendency towards shippers subscribing higher volumes of interruptible capacity can be anticipated going forward. In case of interruptions, this might increase risks of extreme volatility and disruption to orderly market trading on NCG and PSV when a disproportionately large number of shippers balance their positions on the intraday market post-interruption.

In conclusion, we urge BNetzA to reconsider the option to provide higher technical available capacity at Wallbach – Exit not only in light of existing commitments on the Transitgas pipeline, but also to support new potential shippers, foster competition, and mitigate the impact of interruptions on the virtual points NCG and PSV eroding their reliability and liquidity for balancing.

Kind Regards,

Agostino Calcagno

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