

Comments on Congestion Management Guidelines

ERGEG has asked for comments on the Congestion Management Guidelines.

Vattenfall AB see the development of Cross Border Trade as essential for the integration of national markets into regional markets and later the full integration to a pan European Market.

There will always be congestions inside a market and between markets and therefore a further development of market based methods to handle congestion will be of utmost importance to develop cross border trade giving market participants including customers the opportunity to take advantage of trade.

Vattenfall has the view that in order to develop trustworthy wholesale markets, equal access for all market participants to information is very important. Therefore we especially welcome paragraph 5.8, where it is stated that the TSO shall publish also relevant information on generation.

We however do not quite understand the meaning of paragraph 1.14, where it is said that re-assignment of unused capacity should take into account also problems relevant to the degree of competition and market power issues". We assume that it is not a question of reversed discrimination of dominant actors, since that could mean a very arbitrary handling of the different actors.

Vattenfall finds the Congestion Management Guidelines well balanced and fully support the implementation. We also believe that the Cross Border Regulation as such provides an efficient tool for the Commission and ERGEG to take measures for further improvements and integration of regional markets.

Best Regards

Gunnar Lundberg
Vice President Regulatory Affairs
Vattenfall AB