Europex response to the European Commission revision of the Capacity Allocation Mechanisms Network Code

Brussels, 10 November 2026

Europex welcomes the opportunity to respond to the European Commission's consultation on the revision of the Network Code on Capacity Allocation Mechanisms in Gas Transmission Systems (CAM NC).

We support the proposed revision, particularly the introduction of additional capacity booking opportunities, improved transparency on capacity calculation and maximisation, and greater flexibility in adapting auction parameters to changing market conditions. The proposed changes can contribute to a more efficient use of existing gas transmission infrastructure and the functioning of the internal gas market.

1. Implicit capacity allocation (Article 2(5))

Implicit capacity allocation mechanisms play an important role in facilitating efficient capacity allocation and supporting liquidity in gas markets. The existing framework allows national regulatory authorities and TSOs to develop arrangements that reflect the specific needs of their markets.

The possibility to continue applying these mechanisms under Article 2(5) is therefore important. A distinction should, however, be made between existing mechanisms and the introduction of new ones.

We consider that existing implicit allocation mechanisms should be deemed compliant with the revised CAM NC and exempted from further assessments and consultations. This would allow arrangements that are already functioning well to continue without additional administrative requirements, while preserving their contribution to capacity allocation and market liquidity.

For new mechanisms, the assessment should take into account the specific market conditions at the relevant interconnection points and ensure the involvement of affected market participants alongside the whole value chain.

2. Capacity calculation and maximisation (Articles 6 and 7)

We welcome the proposed requirements for TSOs to publish their capacity calculation and maximisation methodologies and consult network users. Access to this information is important for market participants to understand how available capacity is determined and to provide informed feedback on the methodologies applied.

The common publication template foreseen under Article 7 should provide a consistent approach across interconnection points. In addition to the calculation methodologies, it should include information on the underlying assumptions, relevant system parameters and scenarios used by TSOs, as well as the main constraints affecting the capacity offered to the market. Numerical examples would also be useful to illustrate how the methodologies are applied in practice.

Regarding the recalculation of technical capacity under Article 6, Europex considers that changes to available capacity should reflect developments in the transmission network and expected gas flows. Significant changes, such as new infrastructure, decommissioning, repurposing of network elements or substantial changes in expected gas throughput, should be taken into account when reviewing technical capacity.

At the same time, frequent downward revisions may affect existing capacity contracts and booking strategies. It is therefore important to maintain a balance between maximising available capacity and ensuring predictability for network users.

In this respect, we favour an approach whereby technical capacity is reviewed regularly, while recalculations are primarily undertaken when justified by significant changes in network conditions or expected gas flows. Where adjustments are necessary, they should be communicated sufficiently in advance of capacity auctions and take into account their potential impact on existing contracts.

3. Additional capacity booking opportunities (Articles 14, 15 and 16)

The introduction of advance booking opportunities for monthly capacity products, additional auctions for unsold firm capacity and the new balance of the month product addresses the need for greater flexibility in capacity allocation at interconnection points.

As gas commodities are traded on a continuous basis, the possibility to book transmission capacity at more frequent intervals allows network users to better respond to changing market conditions. Reoffering unsold firm capacity through additional auctions should also contribute to maximising the use of existing transmission infrastructure and facilitating trading opportunities.

The balance of the month product is particularly relevant in this context, providing an additional booking opportunity between monthly and daily capacity products. This

should allow network users to better align their capacity bookings with their trading needs.

For these arrangements to function effectively, sufficient information on the capacity offered and appropriate coordination between auction processes are important.

Articles 15 and 16 provide for notification of the capacity offered at least one hour before the bidding round opens. While this establishes a common notification period, earlier publication of available capacity, where feasible, would allow market participants more time to assess their booking needs and prepare their bids.

The timing of additional auctions should also ensure that ascending clock auctions are completed with sufficient lead time before subsequent uniform price auctions. This would allow network users to take the results of earlier auctions into account when booking any remaining capacity and avoid overlapping auction processes at the same interconnection points.

4. Specification of technical auction parameters (Article 33)

Allowing ENTSO for Gas to specify certain technical auction parameters without requiring a further revision of the CAM NC should make capacity allocation arrangements more responsive to changing market conditions.

The possibility to adjust auction frequency, notification periods and the duration of bidding rounds can help ensure that auction arrangements remain suited to the needs of network users. In this context, the consultation of relevant stakeholders, including capacity booking platform operators and network users, is particularly important.

Any adjustments should follow a transparent process, with the relevant national regulatory authorities involved from an early stage. Changes should also be communicated sufficiently in advance, allowing market participants and capacity booking platforms to adapt their systems and procedures where necessary.

Regarding the application of revised parameters, the period between publication of the market notice and their entry into application should reflect the nature of the changes and the technical adjustments required. This would allow the proposed flexibility to be used without affecting the predictability of auction arrangements.

5. Implementation timeline

The proposed introduction of additional auctions and the balance of the month product from gas year 2027/2028 represents an important step towards more flexible capacity booking arrangements.

Their implementation will require adjustments to the systems and operational procedures of TSOs and capacity booking platforms. In particular, the introduction of new auction products and schedules will require coordination between the parties concerned, as well as sufficient time for technical development and testing.

We therefore considers it important that the implementation timeline is feasible for all affected parties. We invite the Commission to assess the proposed timetable in consultation with TSOs, capacity booking platform operators and relevant market participants, taking into account the technical changes required.

Where necessary, flexibility in the implementation dates should be considered to allow the new arrangements to be introduced smoothly and avoid disruption to existing auction processes.

6. Conclusion

We support the Commission's proposed revision of the CAM NC and appreciates the efforts made to address the changing needs of European gas markets.

The additional capacity booking opportunities, enhanced transparency requirements and greater flexibility in auction arrangements should contribute to more efficient capacity allocation and facilitate trading across European gas markets.

We believe that the recommendations outlined above would further strengthen the proposal, particularly by ensuring that capacity allocation arrangements remain transparent, predictable and responsive to market needs.

About

Europex is a not-for-profit association of European energy exchanges with 37 members. It represents the interests of exchange-based wholesale electricity, gas and environmental markets, focuses on developments of the European regulatory framework for wholesale energy trading and provides a discussion platform at European level.

Contact

Europex – Association of European Energy Exchanges
Address: Rue Archimède 44, 1000 Brussels, Belgium
Phone: +32 2 512 34 10
Website: www.europex.org
Email: secretariat@europex.org
EU Transparency Register: 50679663522-75