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**Mr Alberto Pototschnig, Director**  
**Agency for the Cooperation of Energy Regulators (ACER)**  
Trg republike 3  
1000 Ljubljana  
Slovenia

**Lord Mogg, Board President**  
**Council of European Energy Regulators (CEER)**  
Rue le Titien 28  
1000 Brussels  
Belgium

20<sup>th</sup> July 2012

**RE: EFET Gas Committee view on ACER and CEER draft Work Programmes 2013**

Dear Mr Pototschnig,  
Dear Lord Mogg,

The European Federation of Energy Traders (EFET)<sup>1</sup> agrees with the emphasis on finalising and implementing the Network Codes that have already been identified.

We believe that it might be more efficient overall if ACER were to follow the ENTSOG development process more closely, to be aware of both a potential variation from the Framework Guidelines at an early stage and whether or not market participants would consider the variation to be justified.

We would suggest that CEER give consideration to whether some of the output might be better as practical implementation pilots rather than further questionnaires and reports. For example, a pilot implementation of the CAM Network Code with an integrated auction for incremental capacity could be carried out at one or two Interconnection Points in 2013, perhaps through one of the Gas Regional Initiatives.

Should you have any questions, do not hesitate to contact us.

Yours sincerely

**Dr Colin Lyle**  
*Chair of EFET Gas Committee*

**CC:**  
**Jan van Aken, Secretary General, EFET**

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<sup>1</sup> The European Federation of Energy Traders (EFET) promotes and facilitates European energy trading in open, transparent and liquid wholesale markets, unhindered by national borders or other undue obstacles. EFET currently represents more than 100 energy trading companies, active in over 27 European countries. For more information: [www.efet.org](http://www.efet.org).