

**EDP Gás Response to ERGEG 'Principles' Consultation on:  
Capacity Allocation & Congestion Management in Natural Gas Transmission Networks**

EDP, as a member of Eurelectric, subscribes its response to the Public Consultation organised by ERGEG on "Capacity Allocation & Congestion Management in Natural Gas Transmission Networks".

Nevertheless, EDP is both a large consumer of natural gas, for its production purposes in combined cycle power plants, as well as a supplier of natural gas in the Iberian Peninsula.

Thus, EDP Gas, being responsible for the coordination of the gas activities of EDP Group in the Iberian Peninsula, is hereby presenting some additional comments to ERGEG's document, from the perspective of a Shipper performing supply activities to final customers.

As a general comment, we would like to point out that we consider of utmost importance that similar rules are developed for access to LNG terminals and gas storage infrastructures.

In fact, we can certainly affirm that in what concerns the access to the Iberian Peninsula gas market, flexibility rules in the allocation of capacity in LNG terminals and storage as well as fair and transparent congestion management procedures applicable to these infrastructures are crucial for the increase in market liquidity.

Specifically in what concerns the questions placed in the consultation document, we would like to point out question number 8, concerning the protection of the needs of shippers performing supply activities. These shippers need to have access to both stable and firm capacity as well as the possibility to release, in a temporary or definitive basis unused capacity, due to market fluctuation, so we would like to see more focus on measures to promote secondary market of capacity.