

Eustream  
Magyar Gaz Tranzit  
Gas Connect Austria

4 June 2018

**Subject: EFET<sup>1</sup> comments to the HUSKAT Rulebook consultation**

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EFET welcomes the opportunity to comment on the rulebook proposed for the HUSKAT project. To begin with, we would like to stress that we do not perceive the need for an alternative allocation procedure for the project as sufficiently justified. We would therefore like to request further clarification from the TSOs involved regarding the need for deviating from the standard allocation rules. You will find some additional, detailed remarks below.

To begin with, we would like to highlight that the document does not clearly define the liability of the stakeholders involved in the bidding process. For example, article 1 secures the option of modifying the Rulebook without indicating that no changes should be made once the procedure is announced. Furthermore, the document requires bidders to enter into contracts with the TSOs already at the registration stage, without any knowledge of the possible implications, should the project be e.g. delayed or voided.

EFET would also like to stress that the deadlines indicated under article 3.4 will be hard to manage by the potential bidders, particularly the customer registration closing, in light of the number of clarifications shippers would like to receive from the current consultation before committing to the process. Similarly, there is little time between the potentially unsuccessful results of the first economic test and the second bid submission window. More importantly though, we disagree with the proposed December deadline for step-back from the process, which is extremely stringent. The final step back deadline should be delayed, at least so that shippers get to know the results of the current ROHU Open Season, before declaring any HUSKAT capacity requirements.

Finally, for convenience of the process, we would like to invite the TSOs to commit to developing at least a single registration point for customer registration for the process, preferably through a single document. Under the current proposal, article 3.5 places the bureaucratic burden on the bidders, whereas the process could be easily managed through a single point of contact.

Kind Regards,  
On behalf of EFET TF CSEE-G



Davide Rubini,  
Chairman of EFET TF CSEE-G

<sup>1</sup> The European Federation of Energy Traders (EFET) promotes competition, transparency and open access in the European energy sector. We build trust in power and gas markets across Europe, so that they may underpin a sustainable and secure energy supply and a competitive economy. We currently represent more than 100 energy trading companies, active in over 27 European countries. For more information: [www.efet.org](http://www.efet.org).