

Dear ACER colleagues

**Subject: ACER's Public Consultation on the preliminary scoping on potential Framework Guidelines on Rules for Trading**

The UK government has the following general comments on the issues raised in the above consultation, particularly the need for a code on Rules for Trading:

- We welcome the development of network codes which should facilitate cross-border gas trading and support the creation of a well-functioning EU wholesale gas market. However, we do not believe that a code on Rules for Trading (RfT) is needed at this time. We note that this view is shared by the expert group ACER set up to consider a possible RfT code.
- The consultation sets out that an RfT code would focus on capacity trading. However, Member States are currently implementing CAM, which already deals with capacity issues. We therefore believe time should be given for CAM to be fully implemented and allowed to take effect for one or two years before introducing additional rules into the same area.
- It is not clear that any specific market inefficiencies have been identified that an RfT code should be developed to address. We are therefore concerned that this could take focus and resources away from implementation of the existing codes that should significantly improve the functioning of the EU gas market.
- If, once the existing codes have been implemented, it is clear that further steps need to be taken, we would be happy to look again at the need for a targeted RfT code.

Best regards

Department of Energy and Climate Change

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