

**Dong Energy's hørings svar af 10. august 2015 til indførelse af FTR**

**Til Marcus Hübner og Kimmie Byriel Laage-Petersen**

**Vedr.: Energinet.dk's metodeanmeldelse af Harmonised Allocation Rules for Forward Capacity Allocation**

Vores kommentarer nedenfor (på engelsk).

Thank you for the opportunity to comment on the proposal of introducing FTRs on DK2-DK1.

PTRs on the DK2-DK1 interconnector has to some degree added new hedging possibilities. In this respect, we consider the current set up satisfactory, and a change from PTRs to FTRs does not really add more value. In our view the change cannot be expected to add much if any liquidity to the auctions.

On the contrary, we have a concern regarding the regulatory implications (specifically on MIFID II and EMIR reporting) of a change. This in our view adds unnecessary regulatory concerns and risks to the market. Since the current PTRs in effect are used as FTR, we suggest to keep the existing setup using PTRs.

Please contact us if you have any questions to our response.