
Subject: FW: Consultation on Auctioning third phase EU Allowances prior to 2013 ('early auctions') - organisation

From: Sent: Monday, February 07, 2011 2:50 PM

To: CLIMA ETS AUCTIONS

Cc: **Subject:** Consultation on Auctioning third phase EU Allowances prior to 2013 ('early auctions') - organisation

Finnish Energy Industries' comments on the European Commission's consultation on early auctions

The Finnish Energy Industries (EC Register ID number 68861821910-84) is trade and a business organisation for producers, suppliers, transmission, distributors and sales of electricity, for district heating and cooling, and for design, implementation, operation, maintenance and construction of networks and power plants. We would like to give the following comments on the European Commission's stakeholder consultations of volumes for allowances needed to be auctioned prior to 2013:

Relevant factors for fixing early auction volumes

We have the opinion that access to early auctioning will be needed. The list of factors the Commission has reported in its discussion paper are important in determining early auctioning volumes. However we would like to underline that it is very essential to get, as soon as possible, information on

- the total amount of allowances that will be auctioned (not only for early auction),
- a detailed roadmap leading to effective, fully-functioning registry and common auctioning platform
- the future of CERs in the ETS
- a clear calendar for early auctioning.

Defining adequate early auction volumes

We would tend to agree with the Commission's estimate according to which 100 to 300 million allowances to be auctioned prior to 2013, on top of NER 300 allowances. We still hope that the Commission tries its hardest and makes every effort to early auctions prior to 2012.

The Finnish Energy Industries totally agree with Eurelectric's opinion and thus we would like to refer to Eurelectric's comments on this issue.

Further information

The Finnish Energy Industries' publication 'Carbon neutral vision for electricity and district heat for 2050' is available on the internet at:
www.energia.fi/en/publications/vision2050.html