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National Gas

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Our reference:

BBL VOF 26.041

Re: Preliminary Consultation – Capacity Methodology Statements

Dear Nicola,

Thank you for providing the opportunity to respond to your initial consultation on National Gas' (NG) Capacity Methodology Statements. As requested by NG in its consultation document, BBLC's wishes to make clear that this response is predominantly related to the provision of NTS **Exit Capacity**.

As you know, BBL Company (BBLC) owns and operates the BBL gas Interconnector pipeline between The Netherlands (NL) and Great Britain (GB). This pipeline provides a direct connection between the NL and GB gas markets. As such it enables trading between the NBP gas market and the main gas trading hub in Europe (TTF). It also supports security of energy supply and provides market flexibility services to both the GB and NL energy markets.

BBLC agrees with the sentiment within NG's consultation document that as domestic (GB) gas demand declines it is important to sustain suitable commercial arrangement that facilitate the efficient and economic use of the NTS network by both new and existing connected parties. BBLC also feels that it is important that the access arrangements to NG's capacity products supports current and future market resilience and security of supply. Indeed, the recent change of predominant European gas flows, from "East to West" to "West to East", demonstrates the importance of maximising the availability of IP Bacton Exit Capacity. Maximising such capacity would allow NG to exploit the potential for using its network for transit flows, thereby improving the efficient and economic use of its assets.

All NTS Capacity, be it Entry Capacity or Exit Capacity is inseparably interlinked. The provision / use of capacity at one network point impacts the amount of capacity available at another. It is in this context that NG's Capacity Methodology Statements and its Gas Transporter (GT) Licence Entry and Exit Capacity 'Baselines' come together to describe how and where NTS Capacity is made available.

BBLC attended the various 0901R UNC Review Group meetings and sought to contribute to the discussions. BBLC notes that the discussions within the Review Group predominantly focussed on the PARCA arrangements and Entry Capacity. However, in addition to this, BBLC also raised questions regarding the methodologies' role in fostering market resilience, the impact of declining GB gas demand and the future provision / distribution of NTS Exit Capacity. On a number of occasions, BBLC have encouraged NG to undertake a review the current NTS Exit Capacity GT Licence Baselines in light of the declining demand for gas, the desire to foster greater network resilience and the recent Exit Capacity constraints experienced by shippers at the Bacton IP.

NG's GT Licence Baselines were initially introduced in 2008 and have not been subject to broad review since. The current Exit Capacity Baselines are therefore potentially out of step with current network utilisation and or forecasted future network demands. BBLC therefore considers that a thorough review of GT Licence Baselines is timely given the current industry focus on wider network resilience and security of supply during the energy transition. Such a review may enable NG to identify 'available' network capacity which could be realigned to better meet current and future customer demands and support market resilience.

In light of the above, BBLC welcomes NG's recent commitment, at the UNC Transmission Workgroup meeting this month, to completing a "Entry / Exit Capacity Review" which will include a review of its Entry and Exit Capacity GT Licence Baselines. BBLC would encourage NG to move forward with this review at pace whilst ensuring that any changes to the GB regime remain aligned with European arrangements.

Yours sincerely,

Rudi Streuper
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