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Subject
Response to Mod 678 Consultation

BBL Company is pleased to be able to respond to the consultation on the proposed UNC Modification 678.

BBLC considers that the Optional Capacity Charge that has been applied at Bacton has served a useful purpose and has helped to ensure that there has not been unnecessary and uneconomic investment in the NGG transmission system. Consequently BBLC believes that either a Wheeling Service or a modified Optional Capacity Charge should be included in the new NGG Charging Methodology.

BBLC considers that a Wheeling Service, which is currently used successfully at a number of continental locations, and is proposed by Modification 678 I, would be the most appropriate solution and supports this proposal.

In the absence of support for the introduction of a wheeling service, namely Modification 678 I, BBLC supports Modifications 678 D, 678 G, 678 H and 678 J, all of which propose the continuation of a modified Optional Capacity Charge.

Although BBLC is aware of the fact that UNC Modification 670 R is examining an EU compliant new Optional Capacity Charge, we believe strongly that it is not in the market's interest for there to be a period of time with no short haul tariff at all.

As indicated above there are alternatives that have been proposed which provide a compliant solution to a new Optional Capacity Charge or Wheeling Service and, therefore, BBLC only supports these alternative Modifications.

With kind regards,



Jasper Stevens
Regulatory Affairs Manager