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### Representation by WINGAS GmbH

For Mod0501/0501A/0501B/0501C - Treatment of Existing Entry Capacity Rights at Bacton ASEP to comply with EU Capacity Regulations

WINGAS GmbH (WINGAS) would like to point out that any splittings (reallocation, diversion...) even pro rata or capacity returns at Bacton IP ASEP as described in the modification proposals Mod0501 A/B/C may lead to inequitable treatment of existing capacity holders in general. This means that under no-circumstances it should be possible, that a shipper gets caught in a situation, where he cannot make use of his long term acquired capacity contract in the BBL, due to a reallocation of capacities at Bacton IP ASEP.

The relevant modification 0501 and its alternatives A-C do not underline the importance of exempted capacities for matching the technical requirements at the Interconnection Point Bacton between the NTS system and the interconnectors IUK and BBL. WINGAS assumes that these conditions will be strongly considered to secure transit capacities and the interests of international shippers. We recommend to focus on harmonizing capacity and congestion management rules (e.g. to establish cooperation mechanism) between adjacent pipeline network operators across European transit routes to avoid the loss in value of long term capacity contracts.

Kind regards  
WINGAS GmbH

Lars Beuermann  
(Head of Department Logistics)

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