

Agency for the Cooperation of Energy  
Regulators  
Trg republike 3  
1000 Ljubljana  
Slovenia

**BBL Company V.O.F.**  
P.O. Box 225  
9700 AE Groningen  
The Netherlands  
Concourslaan 17

Trade register Groningen 02085020  
www.bblcompany.com

Date  
9 February 2015

Telephone

Our reference  
BBL VOF 15.07

Your reference

Subject  
BBLC response to Public Consultation on the Oil & Gas UK  
proposal to amend the Gas Network Codes CAM and BAL in  
order the retain the UK Gas Day

Dear Sir, Madam,

BBL Company welcomes the opportunity of responding to your public consultation on the above subject. We hereby reply to your three consultation questions:

1. Respondent's name & contact details, name & type of organisation or stakeholder

BBL Company (BBLC), P.O. Box 225, 9700 AE Groningen, The Netherlands,  
Transmission System Operator (TSO).

2. Please provide a short description of your interest, motivation & role in this amendment proposal.

BBLC's main activities are the operation and exploitation of a pipeline facility connecting the Netherlands (Balgzand) and the United Kingdom (Bacton). The BBL pipeline became operational on the 1<sup>st</sup> of December 2006 and since then has been transporting gas on a commercial basis to the UK. BBLC is a certified TSO under the ownership and unbundling requirements of the Third Package and is subject to the regulations that follow from it including the requirement to introduce the Network Codes (NC) on CAM and BAL.

3. Do you support, oppose, or have a neutral position towards the proposed amendment being further considered by ACER? Please specify the main reasons why you think ACER should or should not pursue this amendment request.

BBLC supports the alignment of the EU Gas Day as defined by Article 3(7) of the NC CAM from October 2015 and therefore is opposed to the amendment being considered further by ACER.

Following the establishment of the NCs CAM and BAL, BBLC has been planning for the implementation of the NCs requirements on the basis that the gas days in the UK and The Netherlands will be aligned to 5:00 to 5:00 UTC. Amongst other issues we believe that there are likely to be real difficulties in the introduction and operation of bundled products at interconnection point Bacton if the two relevant TSOs are required to work to different gas days. As a result we believe that the appropriate way forward is to confirm the alignment of the gas days as provided for in Article 3(7) of the NC CAM. Therefore BBLC suggests that the Oil & Gas UK proposal to allow

the UK (and the Republic of Ireland) to derogate from the obligation of adopting common times should **not** be considered further.

In addition, if derogation were granted, BBLC would incur considerable costs in revising the work to our IT-systems and business processes that we have already undertaken in respect of the introduction of the NCs. This could well lead to difficulties in meeting the 2015 target dates.

Yours sincerely

