



**ACER - Public Consultation on the Oil & Gas UK proposal to amend the Gas Network Codes CAM and BAL in order to retain the UK Gas Day
(PC_2015_G_01)**

eni's response

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

- [REDACTED]
- **eni** S.p.A. - Registered office, Piazzale Enrico Mattei, 1 - 00144 Rome

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

eni has been present in the UK gas market since 1964, operating through several subsidiaries.

It sells natural gas through its subsidiary Eni Trading & Shipping SpA (ETS), which, among other things, sells the equity gas produced from Eni fields in the North Sea and operates in the main hubs of Northern Europe (NBP, Zeebrugge, TTF).

Exploration and production activities are conducted - in particular, by **eni's** subsidiaries Eni UK Ltd, Eni Hewett Ltd and Eni Liverpool Bay Operating Co Ltd - in the UK North Sea, the Irish Sea and in areas east and west of the Shetland Islands.

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.

eni is fully in favour of the alignment of the gas day throughout Europe provided for in NC CAM and NC BAL, since it would remove many complexities for the dispatching/balancing activities with positive impacts on gas trades and the liquidity of the gas markets, in particular in NW Europe.

However, we cannot disregard that the implementation of the change of a well-established market rule could be complex and imply costly and time-consuming IT changes. In this respect, the possible 12-month delay of the implementation of the change proposed by Oil & Gas UK could be a proper solution to be adopted, allowing time for a full assessment of the relevant cost and for the possible consideration of a proper compensation mechanism for the impacted operators.