

ACER

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**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**

Statoil welcomes the opportunity to respond to the above consultation.

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

Company name: Statoil  
Type of organisation: Oil & Gas Producer.  
Contact person: [REDACTED]  
Phone: [REDACTED]  
e-mail address: [REDACTED]

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

Statoil is a major global producer of oil and gas, shipping gas to many countries throughout Europe. In the UK Statoil is both a licensed shipper, and supplier, importing significant amounts of gas to the UK market. We are members of the UK trade associations Oil & Gas UK, the Gas Forum and Energy UK.

Statoil has actively participated in the design of the EU Framework Guidelines and Network Codes under EU Regulation 715/2009. We support the role that EU network codes have in removing barriers to cross-border trade and creating an internal market for natural gas.

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.*

**Statoil Oppose the Oil & Gas UK proposal** – Statoil recognises that some UK upstream operators may face increased costs to change to the harmonised gas day throughout the EU. Although Statoil will incur some costs to implement the change in the UK Gas Day we believe the benefits of a harmonised gas day outweigh these costs and therefore we are planning to adapt to the new gas day as of the 1<sup>st</sup> October 2015.

**If implemented the proposal would reduce efficiency gains for Statoil** - Statoil already operates in several EU gas markets we have the ability to cope with different balancing periods throughout Europe. If the Oil & Gas UK proposal to operate a different gas day between the UK and the rest of Europe was enacted, Statoil would be negatively impacted as we would not be able to implement the efficiency gains of having a harmonised gas day throughout the EU.

**The UK market needs clarity** –The Oil & Gas UK proposal is raising significant uncertainty to the UK. We request that ACER clarifies the situation as soon as possible to enable UK market participants to adapt their systems in a timely manner. If ACER decides to further consider the proposal we ask that a detailed timeline of the governance procedures is communicated by ACER to provide transparency and clarity to market participants.