>> GASSCO

Agency for Cooperation of Energy Regulators (ACER)
Trg republike 3
1000 Ljubljana, Slovenia

Your ref.:
Our ref.:   Bygnes, 26.06.2015

Consultation on Disclosure of REMIT Inside Information PC_2014_R_07

Gassco welcomes the opportunity to comment to ACER's consultation. In addition to the comment below, we support the comments made by Statoil to the consultation.

Gassco is an independent operator of the upstream pipeline network on and from the Norwegian Continental Shelf. This system connects some 56 offshore gas producing fields to an integrated processing and transportation system bringing the gas to coastal landing terminals in the UK, Germany, Belgium and France. In its role as operator, Gassco is responsible for information handling between the fields and the companies which have their gas transported in the system (shippers). In the event of an unplanned outage Gassco determines to what extent shippers quantities of gas delivered are reduced. Gassco is moreover responsible for co-ordination of planned maintenance in the transportation system and at the connected fields, in order to achieve minimal disturbances.

Gassco does not fall under the definition of a "Market Participant" under REMIT, but our role described above has led to Gassco publishing information to cater for shippers' need to have potential inside information related to gas producing fields and the transportation system published in a coordinated fashion. This is done at the website flow.gassco.no

Gassco would therefore, in reply to question 3, like to comment on fields 18 and 19 of the proposed UMMs. In Gassco's opinion they should be open for the eventuality that someone not a market participant itself is carrying out the publication. Regarding field 18, Gassco does have an EIC code under Easee-Gas, which we presume can be used, but it would not be a "market participant code" as such.

Yours faithfully
Gassco AS

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This document has been electronically signed at Gassco, hence it contains no signature(s)