

Joint Office for Gas Transporters
Radcliffe House,
Blenheim Court,
Warwick Road,
Solihull,
B91 2AA

BBL Company V.O.F.
P.O. Box 225
9700 AE Groningen
The Netherlands
Concourslaan 17
T +31 (0)50 521 35 41
F +31 (0)50 521 35 45
E management@bblcompany.com
Trade register Groningen 02085020
www.bblcompany.com

Date
31 January 2023

Telephone
+31 50 521 2365

Our reference
BBL VOF 23.08

Your reference

Subject

BBL Company's response to consultation on UNC Modification Proposal 0832S – "Introducing additional flexibility to change the NTS large price step for Ascending Clock Auctions at IPs".

Dear Joint Office,

BBL Company (BBLC) supports the Proposal.

The issues described by the Proposer became evident in April of last year during the Rolling Monthly Auctions for Bundled Capacity at Bacton Exit IP. As one of the adjacent TSO's at the Bacton IP BBLC worked swiftly and successfully with National Grid to resolve the immediate issue as described in the Modification Proposal. Since then, operational arrangements between the TSO's at the Bacton IP have ensured that these auctions have continued to run efficiently and capacity allocated successfully. BBLC remains ready to assist National Grid as required in order for such auctions to continue to function effectively for our customers.

BBLC also understands and supports National Grid's desire to remove its current "*reliance on adjacent TSOs to set the large price step at an appropriate level*" and to introduce the option for it to amend its default price step ahead of such auctions. Recent events within the European energy markets have shown that all parties need an extra degree of flexibility to respond to customer demands.

Relevant objectives:

c) Securing of effective competition: **Positive.**

The current operational arrangements for the Prisma auctions between National Grid and the adjacent TSOs at Bacton are working well and ensure that the relevant auctions are running efficiently.

However, BBLC understands National Grid's desire to introduce arrangements within the UNC to allow it to be less dependent on the adjacent TSOs and also to enable it to respond to a similar situation at the Moffat IP, should it arise. The proposed changes would, in BBLC's opinion, facilitate National Grid's contribution to an efficient capacity booking process at IPs and, to an extent, would also reduce the risk of Capacity Auctions timing out without capacity being allocated compared to the current situation described in the UNC.

e) Compliance with the Regulation and any relevant legally binding decisions of the European Commission and/or the Agency for the Co-operation of Energy Regulators: **Positive**.

BBLC agrees with the Proposer that this Modification Proposal would facilitate National Grid in meeting the requirements of Article 17 paragraph 11 of CAM NC by allowing it to change its large price step for an auction, where such a change is necessary in order to reduce the length of the auction process.

Yours sincerely,



Rudi Streuper

Commercial Manager