



## Shell Energy Europe Ltd

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Via email: [info@gastransport.nl](mailto:info@gastransport.nl)

### Ref: GTS Consultation on BBL merger with the TTF market area

Shell Energy Europe Ltd (SEEL) welcomes the opportunity to comment in response to this consultation. Please see below for answers to its specific questions. As an overriding comment, however, the proposal is to be welcomed as, in several respects, it could be expected to enhance further market integration. In the meantime, please note that this response is not confidential.

#### Do you agree that the integration will deliver benefits to the network users in the TTF and NBP market areas?

SEEL agrees that the merger could be expected to enhance both TTF and NBP liquidity levels, which would likely lead to greater hub convergence. Increasing the GTS Buffer will also require fewer TSO balancing actions; the average reduction of €1.5 million per year in balancing costs should be welcomed.

#### Do you agree that the integration will contribute to the further development of the EU internal energy market?

Yes, the proposed integration of BBL into the GTS market area would enhance the development of the EU internal energy market.

#### Do you agree that the proposed modifications to the BBLC GT&C are compliant with European regulations, specifically the European Network Codes?

SEEL has been unable to identify any areas of non-compliance.

#### Do you agree that the proposed BBLC GT&C modifications are transparent, objective and non-discriminatory?

Yes, the proposals are clear and do not appear discriminatory.

#### Do you have any other feedback?

We would make two further related points regarding the proposed merger:

- a) While the proposal will help simplify the flows of gas between NBP and TTF, more clarity is needed with regards to the impact on other tariffs due to the consequential socialisation of costs (due to the removal of the Julianadorp IP);
- b) More generally, in relation to capacity utilisation, the key driver ultimately remains the attractiveness of tariff levels - set too high and utilisation could expect to be reduced.

I hope you have found these brief comments helpful. Please do not hesitate to contact me should you have any questions.

Regards

Amrik Bal  
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Shell Energy Europe Ltd, acting through its agent  
Shell International Trading and Shipping Company Ltd

*Due to electronic transfer this letter is unsigned*