

Dear Sir or Madam,

Thank you for providing us with the chance to formulate feedback on your proposal to merge the BBL interconnector with the TTF market area. Overall, WINGAS supports the proposals as we think the new arrangements will simplify trading and transporting natural gas between TTF and NBP. Network users in both market areas would benefit from the integration.

Moreover, WINGAS agrees that the integration of the BBL pipeline into the GTS market area may enhance liquidity both, at the TTF and the NBP. The integration may also lead to improved arbitrage opportunities diminishing price differences and fluctuations between the two trading hubs. Therefore, we support the proposal to redistribute the exit Julianadorp tariff of GTS across the other entry and exit points. We also welcome that the increased system linepack reduces required balancing actions by GTS and thus leads to cost savings for shippers.

We are pleased to see that BBL and GTS are considering the commercial impact of the design of their network systems on shippers by conducting analysis on how increased flows through their networks can result in lower unit costs for all and on increased arbitrage opportunities for shippers. With this in mind, and to encourage further bookings, WINGAS would suggest that GTS reconsiders their current use of seasonal factors, which can deter shippers from buying capacities and reduce flows through the GTS system.

Finally, we can agree that within the aims of the Gas Target Model the integration of BBL into the GTS market area would contribute to the further development of the EU internal energy market.

Kind regards,

WINGAS GmbH

Freundliche Grüße/ Kind Regards

**Jan Gibbert**

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**WINGAS. More energy - together.**

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