



**Authority for Consumers and  
Markets**

Attn: Energy Department  
PO Box 16326, 2500BH  
The Hague, The Netherlands.  
Fax number: +31 70 7222 355

**Geneva, 25 May 2018**

**RE: LETTER OF REQUEST ON DRAFT CODE AMENDMENT DECISION**

Dear Sirs,

We make reference to the Draft decision by the Netherlands Authority for Consumers and Markets (ACM) of 1 March 2018, with reference ACM/ UIT/490522 (the "Draft") to amend the tariff structures and terms and conditions;

We make further reference to article 42 of the above Draft which provides that the Short-Haul service would be put to an end due to lack of interest and therefore the related tariff system would also cease to exist.

In light of the above, we would like to oppose to the Draft proposal to put an end to the Short-Haul service given that:

1) We believe that there is an actual interest in the market for that service and Gunvor has shown such interest in the past few months.

2) Since the beginning of this calendar year, Gunvor has been trying to get a quote for the Short-Haul tariff between two specific GTS entry and exit points. However, in spite of our interest and request, not only has GTS shown great reluctance to come back with a reduced tariff but also communication has been overall extremely slow and incomplete. As of today, GTS has still not provided any clarity about the tariff for this service, thereby making it impossible for Gunvor to be put in a position to not only assess but also make use of the Short-Haul service, thus affecting market participants' access to this service.

Therefore, Gunvor cannot agree with the claim that there is a lack interest for this service and to the proposal to put an end to the Short-Haul service.



For all of the above reasons, we would like to and would respectfully request that the service be maintained in the Transmission Code Gas TSO and measures be implemented for its improvement.

Yours Faithfully,

**Gunvor International B.V., Amsterdam Geneva branch**

[Redacted signature]

Head of LNG  
Gunvor International BV

[Redacted signature]

Director  
Natural Gas