



Gasopslag Nederland

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Autoriteit Consument en Markt

Directie Energie

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2500 BH Den Haag

Copy per e-mail to: ACM-post@acm.nl

Alkmaar, 24 March 2023

Subject: Response to 'Ontwerpcodebesluit voorkomen ongewenst balanceringsgedrag'

Dear Madam/Sir,

Vereniging Gasopslag Nederland ("VGN") welcomes the opportunity to comment on the transport code change to prevent undesirable balancing behavior, as published by the *Autoriteit Consument en Markt* ("ACM") on 27 February 2023 with the case number ACM/22/177510.

In general, VGN supports this proposal. However, we would like to express concern about the 5 hour time limit that is mentioned in article 4.1.4.7 sub 5. There are scenarios where a prudent storage system operator will not be able to rectify an imbalance caused by a physical outage within the 5 hour period. In such cases we would need to rely on Gasunie Transport Services ("GTS") to extend the time period as needed, in accordance with article 4.1.4.7 sub 6, so that the prudent storage operator will not be penalized.

In light of the above, we would like to request the ACM to arrange a formal evaluation of the effects of the code change, including the issues mentioned in the previous paragraph, in 2027.

In case of any questions on this response, please do not hesitate to contact

or

We reserve all rights.

Yours sincerely,

DocuSigned by:

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Chairman

Vereniging Gasopslag Nederland