

Number	Party	Consultation reaction	Consultation reaction (translated for convenience)	Response
1.1	VGN	As VGN we have studied the planning assumptions and believe that they are sound.		Most of our assumptions are in line with the results of the simulations done for the EntsoG Winter Supply Outlook or based on recent realizations of cross-border flows. Based on these sources we try to incorporate realistic planning assumptions in the analyses.
1.2	VEMW	Ten aanzien van de ondergrondse gasbergingen (UGS) is het vooralsnog verstandig dat de ingezette maatregel om deze te vullen tot een niveau van minimaal 90 procent voortgezet is. Wij bevelen aan om de in 2022 genomen en in 2023 voortgezette maatregelen te evalueren t.b.v. eventuele bijstelling, onder meer om een ongewenste prijsopdrijving te voorkomen.	With regard to underground gas storage facilities (UGS), it is wise for the time being to continue the temporary measure to fill the UGS to at least a level of 90 percent. We recommend evaluating the measures taken in 2022 and continued 2023 for possible adjustments, in order to prevent unwanted price increases.	Our analysis will, anticipating the amendment of the Gas Act concerning the closure of the Groningen field, also focus on the role of storages with respect to security of supply. Because of the importance of this subject GTS will publish a report separately on this subject soon.
		Ten aanzien van de gasvraag ziet VEMW dat bedrijven hun vraag sinds 2022 verlagen door de hoge en volatiele prijzen, maar dat dit niet structureel hoeft te zijn. De KEV gaat terecht uit van een afname van het aardgasverbruik door de verduurzaming van de industrie, echter een overgroot deel van de afname is niet een gevolg van structurele energiebesparing maar van afschakelen van productie in de industrie als gevolg van het (hoge) prijsniveau. VEMW ondersteunt evenwel het structureel reduceren van de binnenlandse gasvraag d.m.v. gasbesparing.	With regard to gas demand, VEMW sees that companies have been reducing their demand since 2022 by high and volatile prices, but this does not have to be structural. The KEV rightly assumes a decrease in natural gas consumption due to the sustainability of the industry but this is not the case. The vast majority of the decrease is not a result of structural energy savings but of switching off production in the industry as a result of the (high) price level. VEMW however, supports the structural reduction of domestic gas demand through gas savings.	For our advice on the needed capacity and volume for the security of supply our estimates concerning domestic demand originate from the KEV2022. This model takes into account the high gas prices. KEV2022 assumes that the decrease in industrial gas demand is not structural and that demand will rise to the level before mid 2022. In the domestic sector we see however a structural reduction, as in other countries, and therefore we apply a discount on the KEV 2022 numbers for this sector.
		Daarnaast vraagt VEMW zich af hoe GTS aankijkt tegen de maatregelen die genomen worden in het Bescherm- en Herstelplan gas (BH-G) t.a.v. de winning van het Groningengas	VEMW also wonders how GTS views the measures taken in the Gas Protection and Recovery plan (BH-G) with regard to the extraction of Groningen gas.	The BH-G is an emergency plan that provides insight on the measures that EZK could take in the case of a gas shortages. The Groningen field is not one of the measures and is therefore not part of the assumptions. With the capacity shortage that the recent analysis of GTS concluded, it is necessary that measures are available within hours.