

Nr.	Party	Consultation reaction	Response
1.1	VGN	In general, we support the methodology that GTS is using to come to the Groningen advice. With respect to the specific planning assumptions set out in the slide pack, we support the demand assumptions presented on slide #16 and the supply assumptions presented on slide #17. However, we have serious concerns regarding the assumptions presented on slide #18 with respect to the availability of L-gas storages.	See 1.2
1.2	VGN	As stated in the previous section above, the market conditions affecting gas storages are generally not favourable with high transport costs, high variable compression costs and very volatile market demand. We believe that GTS should take this into account in its sensitivity analysis per slide #19. As such, we propose the inclusion of a scenario whereby only 1 out of 4 caverns/storage sites (Zuidwending) is available, as well as a scenario without Alkmaar (Peak Gas Installation). Such scenarios are certainly possible within the normal investment window that is required for GTS to mitigate such closures (assuming a 5-year period for any new investments to be realized).	We have added two new scenarios to the sensitivity analyses 1. Only one (the largest) cavern available as of gas year 21/22 2. PGI Alkmaar not available as of gas year 2024/2025
2.1	VEMW	VEMW, the Dutch representative association of large energy and water users, is happy to see that GTS, based on today's insights and analyses, shared with us on November 25th 2020, foresees for the coming gas year that the planned shutdown of Groningen gas production fields is possible under the conditions set with regard to the Security of Supply obligations and the quality neutral gas market without additional regulation. We understood from the presentation that these obligations and market conditions can be met at least till December 31st 2024, given the planning of new assets implementation (Nitrogen facility Zuidbroek), the availability of storage facilities (Norg and Alkmaar) and the L-gas export decrease.	Your reaction is duly noted.

3.1	ENGIE	As already stated in our answer to previous consultations, GTS still does not consider the impact of the contractual L-gas flows to France and Belgium. The size of ENGIE's contract with GasTerra influences the physical offtake of L-gas in France and Belgium. ENGIE's contract is oversized and this oversupply will increase in the coming years, notably because of the gradual conversion of L-gas end-users to H-gas in France and in Belgium. This oversupply will prompt ENGIE to convert part of the L-gas flows from the Netherlands into H-gas. Between October 1, 2016 and November 30, 2020, a total of 1.6 billion Nm3 of L-gas has already been physically converted to H-gas, and this will only increase in the future. The impact of this conversion must be considered by GTS when assessing the exports to France and Belgium.	We base our analyses on required gas demand as provided to the Task Force Monitoring L-gas Market Conversion by the government of Germany, Belgium and France
3.2	ENGIE	In addition, large quantities of L-gas and H-gas are exchanged between GTS, Fluxys and GRTgaz when shippers nominate the use of conversion facilities from L-gas to H-gas in France and Belgium. The magnitude of these inter-TSOs swaps arrangement which has reached around 4.5 billion Nm3 of L-gas since October 1, 2016, seriously undermines economic incentives and prevents the ordinary course of business operations between market players of the gas market. These agreements contravene to the essential obligation of neutrality imposed on the TSOs and have not been organized in a market-based manner by the relevant TSOs, as provided for by European regulations.	We kindly refer to our recent communication between GTS and Engie concerning this topic.
3.3	ENGIE	As a reminder, and as proposed multiple times since 2016, ENGIE is ready to decrease immediately its L-gas supply contract with GasTerra to the level of its French and Belgian physical needs, meaning a decrease of contractual quantities corresponding to at least 2 billion Nm3 per year. This would help to satisfy the legitimate demand of the Groningen population for safety and the necessity to ensure the security of supply in the Netherlands and in the neighbouring countries.	Your reaction is duly noted.