Respondents

VEMW	Vereniging voor Energie, Milieu en Water	https://www.vemw.nl/
VGN	Vereniging Gasopslag Nederland	https://www.gasopslagnederland.nl/en/startpagina
GasTerra	GasTerra	https://www.gasterra.nl/en
EN-NL	Energie Nederland	https://www.energie-nederland.nl/en/
BBL	BBL company	https://bblcompany.com/

	Remarks/ questions from						
Theme	**VEMW**	**VGN**	**GasTerra**	**EN-NL**	**BBL**	**Remark or question**	**Response or answer by GTS**
Textual	X	X	X	X	X	Various textual questions and comments regarding the consultation document	These have been explained or have contributed to the letter with attachments.
The process	X	X	X	X		Earlier start, this year gave imited possibility for consultation with supporting parties. Draft report also for consultation.	GTS intends to conduct the consultation earlier in future editions. Due to the late clarity about the deadline, this was unfortunately not possible for this edition.
The process			X	X		Relationship between recent publications. Timeliness of data.	With the supply security overview, GTS fulfills its statutory duty. On its own initiative, GTS published a vision on supply security in March 2024. If relevant, new publications will align the principles with recent information and insights.
Scenarios		X				Concerns about aligning with other scenarios, like KEV2024, IP2026, ENTSOG.	A description and comparison is given in the appendix to the letter of available forecasts and scenarios. For the domestic demand the KEV figures are sufficient. For interaction within NW-EU countries additional insight are based on ENTSO-G.
Scenarios	X					Applying variants, the combination of more effects can result in more and different variants	The variant with reduced supply can be equated with a variant with more demand, and more supply can be equated with less demand. For this edition, GTS has chosen variations on the supply-demand balance that seem realistic and have the greatest effect on the outcome. This aligns with the January letter. An alternative approach may be considered for future editions.
Scenarios				X		Assume more imports from B en UK in the variant with tight supply.	The variant with reduced supply can be equated with a variant with more demand, for example from Germany. The variable here is a limitation of supply (or increase in demand), not the limitation of technical import capacity.
Gas storages				X		Potential impact of the winning plan of the Norg storage facility	As long as there are no concrete indications that the availability of infrastructure changes, GTS assumes the existing situation. Based on the capacity balance and the required working gas volume, alternative situations can be derived.
Methodology				X		Target date on 1 October or 1 November?	The date of November 1 follows from practice. This does not affect the analysis, as the average gas demand in October and April is very close to the annual average demand. As long as the months from November to March are considered winter, the choice between October 1 or November 1 is subordinate.
Methodology		X				Preferably one wide-based model rather than a special model. More openness about GTS model.	This may be considered for later editions.
The Netherlands		X		X		Justification of (KEV2022 - 10%) and declining demand due to energy transition.	GTS uses KEV2022 as a basis and applies a correction to it, which is further substantiated in the appendix to the letter. The publication of KEV2024 is not timely enough to serve as input.
Germany		X		X		What is the source for information about the development of gas demand in Germany?	GTS bases its plans on the TYNDP, direct information from German TSOs, and the Concept Szenariorahmen 2025. Additionally, an increase in demand is expected due to transit from UA and transit to Austria, as well as the conversion from L-gas to H-gas.
Belgium		X	X	X		Is the supply from Belgium in the winter months, based on technical maximum, more than 130 TWh?	GTS uses a Northwestern European perspective. Capacity can only be utilized with sufficient supply. Based on historical data, imports from Belgium are assumed to be temperature-dependent, with more imports in warmer months.
BBL pipeline			X			Is the BBL importing towards the Netherlands until November?"	The assumption of GTS has been maintained.
BBL pipeline					X	What was the role of the BBL during the crisis?	The importance of good interconnection between markets, such as the BBL, is included in the letter and appendix.
LNG			X			Seasonal flexibility by LNG imports?	GTS assumes a limited role for LNG, see the explanation in letter and appendices.
LNG			X	X		Annual volume EET too low?	GTS bases this on information from the EET operator.

Neighbouring countries		X	X	X		Market forces not sufficiently taken into account in the interaction between countries. What is the driving force in the use of gas storages? Historical flow vs. possible use of maximum entry capacity.	GTS defines the demand and then fills it in with physical measures. An approach has been chosen that does justice to the NW EU perspective. Maximum import from a neighbouring country creates a possible shortage in the country concerned. The physical balance results in signals within the market, on which market parties will act. See also explanation in letter and appendices.
Neighbouring countries		X	X			What is the effect of distributing import flows across countries within NW Europe, both Norwegian gas and LNG?	At the same total volume this mainly affects the exchange between countries but has no direct effect on security of supply. See explanation in letter and attachments.
Neighbouring countries		X				Has there been coordination with neighboring countries?	Yes, with TSO's in general and specifically with Gasunie Deutschland
Quality conversion			X	X		Planning assumptions for H to L conversion capacity	Assumptions are described and specified in detail in the letter with annexes