

1. Do you wish your response to remain confidential (Y/N)?

N

7. Do you believe the introduction of a targeted charge will change shipper behaviours such that flows could be redirected to avoid paying the additional charge? a. Please give your reasoning for your answer

Gassco is the state owned independent operator of the Gassled joint venture who owns the Vesterled pipeline which brings Norwegian gas to the UK market through the "NSMP Terminal" in St. Fergus.

The Gassled Transportation system consists of around 9000 kilometers of gas pipelines with exit points in Germany (Dornum and Emden), Belgium, France and the UK (Easington and St. Fergus). The dry gas part of the transportation system is set up with uniform exit tariffs and free swap between exit points to cater for Norwegian gas flowing to the various markets according to price signals. We can observe that this flexibility is highly utilised by the shippers, in particular towards St. Fergus. For data on this see e.g. the website: <https://umm.gassco.no> under "Historical nominations".

Hence it is reasonable to assume that an increase in the entry cost downstream the Gassled exit point in St. Fergus, everything else being equal, would result in reduced flows towards that exit point.