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## Consultation on the adjusted commercial gas balance model

11 August 2021

Ørsted is pleased to get the opportunity to give our input to the above consultation published 6 July 2021. A liquid and robust short-term gas market with adequate market signals is important for the functionality of the Danish market.

Our ref. petbi

Ørsted agrees that the introduction of BalticPipe should lead to a new operational balancing regime for the Danish/Swedish balancing zone. In this regard we find the adjusted model well-considered and appropriate.

Further, we are encouraged that Energinet agrees with our proposal to refrain from notifying the market prior to a balancing intervention. This will incentivize shippers to react before reaching the yellow zone and thus support ongoing trading activities and the liquidity in the Danish within-day market. In this regard, we propose that the main methodology paper is adjusted accordingly and page 10, 2<sup>nd</sup> paragraph is changed from *"If the ASB is outside the green zone in any hour of the gas day, the BAM will notify the market, and will make a within-day trade during the following hour"* to *"If the ASB is outside the green zone in any hour of the gas day, the BAM will make a within-day trade during the following hour"*. Consequently, the 4<sup>th</sup> paragraph in the Rules for Gas Transport (section 9.2.3) that now reads *"Shippers shall receive a trade notification when the Accumulated System Balance is in the Yellow Zone, stating if Energinet are to sell or buy at the within day market and the respective quantity"* is changed to *"Shippers shall be advised that Energinet will intervene in the within-day market when the Accumulated System Balance is in the Yellow Zone"*.

We are off course available for questions you may have in relation to our consultation response.

Yours sincerely

Ørsted



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