



Stavanger, 08/Sept/2023

TO: **Energinet**  
Tonne Kjærsvej 65  
7000 Fredericia, Denmark

FROM: **PGNiG Upstream Norway AS (ORLEN)**  
Moseidsletta 122  
4033 Stavanger  
Norway

ATT: *Mr. Mads Lyndrup*

Ref:  
**Market consultation on Energinet's application for an amendment of the Danish Regulator's decision on the establishment of a joint market zone of 14 February 2022 (published 18.8.2023 on Energinet's website)**

*Dear Energinet,*

as you know, the PGNiG Group ("PGNiG") has been an active participant of the Danish gas market at least since the year 2016, that is from the outset of the Baltic Pipe ("BP") project. Since the ORLEN Group ("we", "ORLEN") acquired PGNiG on 1 November 2022, ORLEN has become Energinet's counterparty to the BP capacity contract signed by PGNiG during the Open Season 2017 ("OS 2017").

Over the last years, BP has been closely followed up by PGNiG Upstream Norway, which is now a subsidiary of ORLEN responsible for sourcing equity gas for BP.

Having regard to the above, hereby respectfully we provide our position on the Energinet's application (**Application**) for an amendment of the Danish Utility Regulator's (**DUR**) decision on the establishment of a joint market zone of 14 February 2022 (**Decision**)<sup>1</sup>.

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<sup>1</sup> Forsyningstilsynets Afgørelse om etablering af fælles markedszone, 14.02.2022, Sagsnr.: 21/01768, <https://afg.forsyningstilsynet.dk/>

A handwritten signature in blue ink, appearing to be "Mads Lyndrup", located in the bottom right corner of the page.

The position was prepared with the support of SWORA Legal Advisory led by Dr. Iur. hab. Mariusz Swora, Attorney At Law (international energy law expert, a member of the Strategic Advisory Board at Energy Regulators Regional Association, and a former full member of ACER Board of Appeal) and is attached hereto as Appendix 1.

Sincerely,  
General Manager



Marek Woszczyk

General Manager  
PGNiG Upstream Norway AS  
ORLEN Group

APPENDIX 1:

**ORLEN position on Energinet's application for an amendment of the Danish Utility Regulator's decision of 14 February 2022 on the establishment of joint market zone**