Ofgem's Consultation – Facilitating CAM implementation at Bacton

Eni S.p.A. (hereinafter **eni**) thanks for the possibility to participate to this consultation and provides its answers hereunder.

CHAPTER: Two

Question 1: Do you agree with our proposal to only implement the CAM network code in respect of the allocation of entry and exit capacity on the NTS at IPs?

Yes, we do.

CHAPTER: Three

Question 2: Do you agree with our proposal to split the Bacton ASEP into a UKCS ASEP and IP ASEP?

We agree that isolating Bacton IP ASEP from UKCS ASEP is a necessary step to meet CAM requirements. However, when the existing capacity holders made their entry capacity bookings, they did so because they had an expectation that their entry capacity bookings at Bacton terminal will remain interchangeable between different sub-terminals at Bacton ASEP. Therefore these shippers will see a material change in the entry capacity product that they originally bought and before splitting Bacton ASEP they should have been offered an option to re-set their entry capacity holdings.

Question 3: Do you agree with our proposal to create one single IP ASEP, with the baseline capacity set at the sum of the maximum technical capacity for the IUK and BBL interconnectors?

Yes, as far as this option is in line with CAM requirements.

CHAPTER: Four

Question 5: Do you agree that no change is required to the existing licence obligations relating to NTS exit capacity in order to facilitate the implementation of the CAM network code?

Yes, we agree.

Question 6: Do you agree that there is a need to amend the definition of Off-peak Exit Capacity in NGG's NTS licence?

Yes, we agree

CHAPTER: Five

Question 7: Do you agree with the proposed changes to NGG's NTS licence that we have set out in appendix 3?

Question 8: Do you consider that some form of transitional arrangement is required? If so, do you consider that our proposals, as set out in this document, meet these requirements?

Question 9: Are there any other changes to NGG's NTS licence (or any other licence) that you consider are required to facilitate the implementation of CAM?