

## **ACER Public Consultation on the Oil & Gas UK proposal to amend the Gas Network Codes CAM and BAL in order to retain the UK Gas Day**

BP welcomes the opportunity given by ACER to respond to the abovementioned consultation.

### *1. Respondent's name & contact details, name & type of organisation or stakeholder.*

Company name: BP  
Type of organisation: Oil & Gas Producer, Terminal Operator and Trader  
Contact person:  
Phone:  
e-mail address:

### *2. Please provide a short description of your interest, motivation & role in this amendment proposal.*

BP has producing assets in the UKCS and is also the operator of the CATS gas receiving terminal at Teesside. BP is also a trader of gas throughout North West Europe. BP is a member of Oil & Gas UK and the Gas Forum.

### *3. Do you support, oppose, or have a neutral position towards the proposed amendment being further considered by ACER? Please specify the main reasons why you think ACER should or should not pursue this amendment request.*

BP supports the proposal being considered further by ACER. The CAM Network Code states in Article 2.1 that entry points from production facilities are not covered by the code. However because of the nature of the BAL Network Code it has become apparent in the UK that entry points from production facilities will have to change their gas day unless this modification request is granted.

The GB market has functioned perfectly well with a different gas day to continental Europe since the Interconnector began operating. The time difference between the UK, Belgium and the Netherlands has had no adverse effect; this is evident in the fact that the NBP and TTF are the most liquid hubs in Europe.

The adverse impact of the gas day change was not fully explored during the CAM and BAL drafting process. By continuing with this modification request a cost benefit analysis could be carried out where the unintended consequences and costs to the upstream industry in the UK of changing the gas day can be explored further.