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Date
30 November 2016

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Our reference
LCP 16.0787

Your reference
16.0168.29

Subject
Response to consultation regarding the functioning of the
wholesale gas market in the Netherlands

Dear Sir, Madam,

Gasunie Transport Services B.V. (GTS) welcomes the opportunity to respond to your consultation document 'Self-evaluation Gas Target Model (GTM) II: functioning of the wholesale market in the Netherlands', dated 27 October 2016.

In this document, ACM invites market participants and other stakeholders to put forward their views on the current level of market functioning of the TTF and is asking for feedback that might contribute to improving the functioning of the Dutch wholesale market as well as the functioning of the TTF. In addition, ACM is referring to current initiatives which are exploring possible cross-border market integration of TTF with both German market areas (Gaspool and Net Connect Germany). It is our pleasure to provide you with the concise feedback as stated below.

The main points we would like to bring to your attention are:

- GTS agrees with the statement of ACM that TTF is well-functioning and that it is operated in a fair and non-discriminatory manner.
- GTS believes that further development of the European gas market by reducing or removing hurdles will improve the functioning of the Dutch wholesale market and have a positive effect on the TTF gas hub. This can be achieved by integration with neighbouring markets, for example in the form of a Trading Region.
- GTS is in favour of a further investigation into the cost, benefits and feasibility of market integration possibilities (such as TTF with the German market areas as mentioned by ACM) and will be happy to provide its support to such investigation.
- In addition, GTS and BBL Company V.O.F. are currently jointly investigating whether it would be possible to integrate the BBL interconnector into the TTF market area.

Gasunie Transport Services B.V.

Date: 30 November 2016

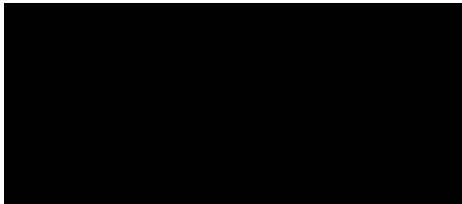
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Should you require any further details on the content of this response, please do not hesitate to contact me, as I would be happy to discuss this matter further with you.

Yours sincerely,

GASUNIE TRANSPORT SERVICES B.V.



René Schutte
Manager Projects Industry & Markets