

Response received via email:

Dear Sir/Ma'am,

Please find below EGC feedback to IUK consultation on proposed reshuffling and post-2018 capacity sale.

Q1. Do you support the proposal to introduce the potential for future reshuffling process?

A1. We welcome your proposal to introduce Reshuffling as an option to adjust booked capacity, especially in the context of NC CAM implementation when from November onwards only bundled capacity is going to be auctioned.

Q2. Do you think both the time shift and the location shift will provide additional flexibility?

A2. We believe that both time shift and location shift will provide additional flexibility to Shippers. At the same time, we want to highlight that Reshuffling as a tool can only work to its full extent if the respective services are aligned between adjacent TSOs (in terms of location services at both sides of an interconnection point and identical time windows in case of time shift)

Q3. In particular, would you like to see a time shift reshuffling service launched to allow capacity held now to be shifted to 1 October 2018 and beyond?

A3. Yes, we welcome it.

Q4. Would you support the idea of a sales process to be held before 31 October 2015, offering shippers the opportunity to purchase capacity for use from 1 October 2018 enabling them to flexibly arrange their capacity portfolio?

A4. Yes, we support it.

Q5. Do you have any comments on the proposed legal drafting amendments to the IAA and IAC to introduce the reshuffling service?

A5. We agree to the proposed amendments to IAA and IAC to introduce Reshuffling service.

Q6. Do you have any other feedback on the proposed service?

A6. Most importantly, in our view, successful Reshuffling requires TSOs cooperating and offering identical services at both sides of an interconnection point. Hence, we hope that you will align with both NGG and FLUXYS to allow for capacity alignment to bring them in line with reshuffled capacities.

Regards,

Jayant Malik

E.ON Global Commodities SE