



ROYAL NORWEGIAN  
MINISTRY OF PETROLEUM AND ENERGY

Bundesnetzagentur  
Beschlusskammer 7  
Postfach 8001  
53105 Bonn

Your ref  
BK7-19-037

Our ref  
20/24

Date  
24.01.2020

**CONSULTATION – KAP+ PROCEDURE**

With reference to your letter regarding consultation on KAP+ procedure of Ruling Chamber 7 of the Bundesnetzagentur for additional capacity in the single German market area (BK7-19-037) dated 13. December 2019.

The Norwegian gas pipelines delivering gas to Germany are part of the Norwegian integrated gas processing and transportation system which connects producing fields on the Norwegian Continental Shelf to onshore facilities in Norway and landing terminals in (inter alia) Germany. Consequently, the pipelines are defined and regulated as an “upstream pipeline network” with regards to Directive 2009/73. The pipelines are furthermore regulated by the Norwegian Petroleum Act section 4-8 and Chapter 9 of the Petroleum Regulations under the Ministry of Petroleum and Energy, as part of the overall management of the petroleum resources on the Norwegian Continental Shelf.

A substantial share of the Norwegian piped gas is exported to Germany, and the availability and capacity to route gas to German landing points at current levels is of great importance in the overall management of the petroleum resources on the Norwegian shelf. The Ministry has been made aware that companies exporting gas from Norway are concerned as the proposal may introduce uncertainty with respect to downstream capacity and other measures that may impact gas flows in the Norwegian upstream pipeline network and the amount of gas than can be directly landed in Germany.

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We therefore encourage a dialog with Gassco, the Norwegian upstream pipeline network operator, and larger shippers of gas from Norway to ensure that the merger and market design will not affect Norwegian gas flows negatively going forward.

Kind regards,

Lars Tarald Kvam  
Deputy Director General

Christopher Reinskou  
Senior Advisor