

BBL Company Charging Methodology

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Introduction

This document describes the Charging Methodology (CM) that BBL Company (BBLC) proposes to use for future sales of capacity by means of a Capacity Allocation Mechanism under the provisions set out in the BBLC General Terms & Conditions. The capacity allocation mechanism is an auction mechanism as required by the CAM NC, for which the PRISMA platform is used, or any other mechanism that has NRA approval.

This CM applies to all available non-exempt capacity sold under BBLC's General Terms & Conditions (GT&C). This CM applies to both forward flow capacity towards the GB and reverse flow capacity towards the Netherlands. Capacity that was sold before the effective date of this CM is subject to the CM that was valid at the time this capacity was originally allocated to the shipper. Congestion management procedures are an exception to this rule. The surrender of capacity and long term-use-it-or-lose-it mechanisms apply to all non-exempt capacity irrespective of the date of allocation.

Background

The BBL Interconnector provides services to flow gas physically from The Netherlands to the GB. Services to flow gas physically from the GB to the Netherlands will be available from (DATE TO BE CONFIRMED).

Commercial forward flow operations began in December 2006 with extra capacity provided in 2010 as a result of the installation of the 4th Compressor at Anna Paulowna.

In 2004 an open season was held to gauge market interest in constructing the BBL pipeline. A CM was developed which met the criteria of transparency, objectivity and non-discrimination. From the CM BBLC derived the tariffs for the various products on offer.

Sufficient market interest was shown to enable a business case to be made for the construction of the pipeline. The three launching contracts were accepted by the relevant regulatory authorities as being contracts exempt from regulations on tariffs and access rules.

In 2008 the 4th Compressor project was mooted and the relevant authorities agreed that the initial CM could be used for any capacity made available following the installation of the extra compressor. A similar open season was held and as a result five contracts were signed with shippers. It was agreed that the contracts signed in 2010 could not be regarded as exempt contracts.

In 2017 BBLC took the decision to undertake a project which would enable physical reverse flow capability on the BBL pipeline for up to one third of the forward flow capability. From (DATE TO BE CONFIRMED) BBLC will be offering firm and interruptible reverse flow services. This CM is applicable to the both forward flow and reverse flow capacity products for which tariffs and underlying values are calculated separately. Until physical reverse flow services are offered, BBLC's CM for virtual reverse flow services will remain in place.

Objectives

Standard Licence Condition 10(6) requires BBLC to comply with a direction from Ofgem to amend its CM for the purposes of meeting the four Standard Licence Conditions objectives.

Standard Licence Condition 10(11) notes that BBLC shall not make a modification to the CM unless all reasonable steps have been taken to ensure that all persons, including those in other Member States, who may have a direct interest in the CM, including the Authority, are consulted on the proposed modification and has allowed such persons a period of not less than 28 days within which to make written representations.

BBLC considers that this CM is compliant with CMP, the CAM NC and the TAR NC. Derogation from several NC TAR articles will be sought. Following the 28 days consultation period and after considering any representations received to the proposed modifications the CM will be submitted to Ofgem for approval.

Market Environment

BBLC operates the pipeline in a commercial and competitive market environment. BBLC has no captive customers and therefore there is no certainty of recovery of costs. As long as BBLC is operating in a competitive environment, it needs to be able to respond quickly to developments in the market. The CM acknowledges this market environment.

From the approved CM BBLC is able to derive charges for the various products sold and is able to adjust tariffs as appropriate to reflect the competitive situation in the market. Tariffs for forward flow capacity products and reverse flow capacity products will vary according to the market situation at any one time.

Tariff predictability is judged as important by shippers and traders. Therefore, together with the publication of the reserve price for the annual yearly capacity auction, BBLC proposes to publish the maximum reserve prices for all non-yearly capacity products for the upcoming gas year. These maximum reserve prices will be published at the latest thirty days before the annual yearly capacity auction. BBLC will set the relevant maximum reserve price for its capacity products by applying the multiplier range described hereunder and similarly can reduce reserve prices from these maxima taking into account the minimum notification periods – see below.

Charging Methodology

BBLC's CM consists of four components described below. Each component is subject to one or more key factors. This CM has been the basis of BBLC's operations since the start of the project in 2004 and was approved on the basis that it met the objectives as set out in Standard Licence Condition 10(4) namely that the CM is objective, transparent and non-discriminatory. ~~Furthermore, in a letter of 24 April 2008 it was concluded that the CM meets the criteria set by the Dutch Minister of Economic Affairs. This CM received the approval of both Dutch and GB authorities.~~

Subsequently a fourth objective was added to Standard Licence Condition 10(4) which requires the CM to be compliant with relevant European decisions including Codes. Compliance with this fourth objective is achieved by incorporating the principles of the relevant European decisions into the CM, which may be subject to revision as and when new European Regulations are introduced.

Any change to BBLC's CM has to be compliant with decisions taken by the relevant national regulatory authorities. This means that the CM has to be compatible with both jurisdictions. This has been achieved by incorporating a further level of detail in the Great Britain CM by adding a section that ensures compliance with SLC 10(4) while leaving the remainder of the CM, that is already objective, transparent and non-discriminatory and approved by the Dutch authorities, untouched.

Charging Methodology components

The charges for all capacity products are derived from three of the CM's four components that form part of both the GB and Dutch CM:

1. a fixed fee for capacity
2. an adjustment formula for the duration of the contract
3. an indexation for inflation

The fourth component is not part of the charges for the capacity products and is invoiced to shippers separately based on the allocated use of the capacity rights:

4. a variable fee to cover the cost of energy used to transport the gas

The required further level of detail in the GB CM is included in the remainder of this CM.

Key factors in the determination of the components

1. The fixed fee for forward flow capacity was first established in 2006 at the start of commercial operations and confirmed in 2008 prior to the installation of the fourth compressor. The fixed fee has been adjusted with indexation every year since. In the

underlying business case the fixed fee reflected the project costs which were originally based, in this case, on the capital costs of the pipeline and installations, operating costs incurred as a result of performing normal business operations and a reasonable return of capital.

~~This relationship between tariffs and costs still applies.~~ In addition the current market environment requires BBLC to be able to respond quickly to changing market circumstances and competitive forces from suppliers of similar services. ~~Therefore, the fixed fee is now redefined as the combination of three key factors: the base price, the competitive forces and the discount factor.~~ Therefore, it is proposed to redefine the fixed fee as the combination of four key factors: the base price, the competitive forces factor, the reserve price discount factor and the risk premium.

- The base price is what used to be the original fixed fee based on the underlying business case. The base price is still expressed at the 2006 price level and is subject to annual indexation per gas year.
- The key factor 'competitive forces from suppliers of comparable services' enables BBLC to adjust the reserve price for the yearly capacity product in order to reflect competitive market circumstances. Prices of competing services are taken into consideration in the determination of the appropriate fixed fee.
- To encourage ~~longer term booking of capacity network users to book annual capacity products on a long term basis~~ the Y +1 reserve price may be discounted for future years, namely Y +2 to Y +15. Such discount will be reflected in the reserve price for the relevant years. Any discount will apply to individual years. Shippers will be able to book capacity for individual years: it will not be necessary for them to book consecutive years of capacity.
- A risk premium reflecting the benefits of certainty regarding the level of transmission tariff as a result of the fixed payable price approach. This is a TAR NC requirement.

The fixed fee and the underlying key factors will be published on the BBLC website.

From (DATE TO BE CONFIRMED) BBLC will offer firm and interruptible reverse flow capacity products. The four factors used to calculate the fixed fee for reverse flow capacity are the same as for forward flow capacity. The fixed fees for forward flow and reverse flow capacity are calculated separately.

2. The adjustment formula for the duration of the contract consists of two key factors:
 - a multiplier applied to the respective proportion of the reference price in order to calculate a price for a non-yearly capacity product.

The multipliers (M) are determined for each capacity product with a duration of less than one year:

- ~~Yearly (y) capacity product~~
- Quarterly capacity product
- Monthly capacity product

Day-Ahead capacity product
 Within-Day capacity product

The multipliers of these products are set to ensure sufficient revenues for an economic and financial stable company result and to enable BBLC to react to competitive forces from suppliers of comparable services for specific capacity products, ~~thereby enabling competition.~~

~~For capacity sold between the effective date of this CM and the introduction of CAM on 1 November 2015, BBLC will apply a comparable multiplier and discount factor that reflect the duration and future start date to incentivise long term future bookings with a duration of multiple years.~~

~~At the latest thirty days before the annual yearly capacity auction, BBLC will publish the maximum multipliers for all non-yearly capacity products for the applicable auction gas year. The published maximum multiplier will fall within the following range:~~

Capacity product	Quarterly	Monthly	Day-ahead	Within-day
Lower limit	0.5	0.5	0.1	0.1
Upper limit	1.5	3	6	6

~~BBLC may reduce the actual multipliers from the published maxima in advance of the auction.~~ The actual multipliers will be published on the BBLC website.

- a seasonal factor reflecting the variation of demand within the year

~~The seasonality factor (S) is defined in such a way that the expectation of demand and to be contracted capacity within the year allows BBLC to have sufficient revenues for an economic and financially stable company result.~~ The seasonal factors enable BBLC to take demand fluctuation within the year into account and are determined for each month separately.

The seasonal factors will be published on the BBLC website.

~~3. When invoicing booked capacity in a future gas year, t~~The reserve price for available capacity is subject to annual indexation. For the annual indexation the consumer price index is used as published by the Dutch statistics office CBS (Centraal Bureau voor de Statistiek, series 'Total Expenditure, 2006~~2015~~=100'). The applicable annual indexation to the reserve price is 25% of the CBS indexation.

The indexation factor will be published on the BBLC website.

~~The components 1, 2 and 3 and the underlying key factors result in the following formula to calculate the reserve price (RP) for each capacity product separately:~~

$$RP = \frac{FF \times MP \times S}{FF = BP \times I \times CF \times DF}$$

Where:

RP = reserve price in €/kWh/h/product period
 FF = fixed fee in €/kWh/h/product period
 BP = base price in €/kWh/h/product period expressed in the 2006 price level
 I = indexation factor to adjust the base price to the current price level
 CF = competitive forces factor
 DF = discount factor
 MP = multiplier due to duration for non-yearly products
 S = seasonality factor

All product base prices (BP) are a specified fraction of the base price of the yearly capacity product. The fraction depends on the duration of the product divided by duration of a year (e.g. the fraction of the year for a month is 1/12, for a quarter is ¼ etc.).

The components 1, 2 and 3 and the underlying key factors result in the following formula to calculate the reserve price (RP) for each capacity product separately:

$$\begin{aligned}
 \underline{RP} &= \underline{FF} \times \underline{D} \times \underline{I} \\
 \underline{FF} &= \underline{BP} \times \underline{CF} \times \underline{DF} \times \underline{RP} \\
 \underline{D} &= \underline{M} \times \underline{S}
 \end{aligned}$$

Where:

RP = reserve price in €/kWh/h/product period
FF = fixed fee component in €/kWh/h/product period
D = duration component for non-yearly capacity products
I = indexation factor to adjust the base price to the current price level

BP = base price in €/kWh/h/product period expressed in the 2006 price level
CF = competitive forces factor for the yearly capacity product
DF = discount factor for individual yearly reserve prices of Y+1 to Y+15
RP = risk premium

M = multiplier for non-yearly capacity products
S = seasonal factor

Interruptible forward flow capacity is auctioned when all firm capacity for a product has been sold with a reserve price discounted by 10% on the firm reserve price. In the event of an interruption the shipper will be reimbursed proportionally for the total price paid. An ex-ante discount is applied based on the probability of interruption in line with Article 16 of the TAR NC. In the event that technical firm (non-CMP) capacity becomes available after interruptible capacity has been sold, this interruptible capacity will be upgraded to firm without additional charges.

The reserve prices of all capacity products will be published on the BBLC website.

The fourth component is not part of the reserve price for the capacity products and is invoiced to the shippers separately based on the allocated use of capacity rights.

4. The variable fee to cover the energy costs relates to the electricity required to drive the compressors at Anna Paulowna and fuel gas to heat the gas at Bacton and is invoiced to shippers separately from the capacity invoice.

Based on realised flows and energy consumption, average consumption factors will be derived. On a yearly basis the average factor of the previous year will be defined for gas and electricity consumption. Based on the energy purchase agreements for each year the cost per unit for energy (gas and electricity) will be defined.

The variable fees for gas and electricity are calculated for forward flow and reverse flow separately and will be published on the BBL website.

The following formula is used to determine the energy costs:

$$E = A \times Pe + B \times Pg$$

Where:

E	= variable fee to cover the energy costs in €/MWh
A	= constant
Pe	= electricity price in €/MWh
B	= constant
Pg	= gas price in €/MWh

The electricity price, the gas price, both constants and the resulting variable fee to cover the energy costs will be published on the BBLC website.

The total costs (TC) are the combination of the booked capacity, the reserve price (RP), the auction premium (P) if any, [an incentive factor for longer term capacity bookings, an incentive factor for combination bookings of forward and reverse flow capacity](#), and the energy costs (E) for the use of the capacity rights.

$$TC = \text{booked capacity} \times (RP + P) \times \text{LTBI} \times \text{CBI} + (\text{allocated use of capacity rights} \times E)$$

Where:

TC	= total costs in €
RP	= reserve price in €/kWh/h/product period
P	= auction premium in €/kWh/h/product period
LTBI	= long-term booking incentive
CBI	= combination booking incentive for consecutive forward and reverse flow products
E	= variable fee to cover the energy costs in €/MWh

[To encourage shippers to book annual capacity for a number of consecutive years in an individual auction, a long term booking incentive \(LTBI\) may be offered. Capacity products that are longer in duration may be eligible for a discount that increases with the booking period \(longer period equals higher discount\). This discount will not be reflected in the reserve prices. Capacity holders may submit a request for discount after the annual yearly capacity auction for the capacity obtained during that auction.](#)

The long-term booking incentive will be published on the BBLC website.

BBL's physical reverse flow capability from **(DATE TO BE CONFIRMED)** will make it easier for market parties to access seasonal storages at the continent. As an incentive to book a combination of firm forward flow and reverse flow capacity products (CBI), shippers who book a consecutive combination of forward flow capacity products and reverse flow capacity products (e.g. 6 months forward and 6 months reverse or bookings in combination with storage capacity) may be eligible for a discount. The discount will not be reflected in the reserve prices. The minimum booking period and applicable discounts will be published on the BBLC website. Capacity holders may submit a request for the discount after the end of the calendar year for the capacity obtained during that year.

The combination incentive will be published on the BBLC website.

Capacity bookings and energy costs are invoiced separately on a monthly basis. When invoicing the capacity charges for a future year, the reserve price is subject to annual indexation per gas year. Any auction premium will remain fixed.

Congestion Management Procedure (CMP)

~~CMP applies to all available capacity and sold non-exempt capacity. CMP does not apply to exempt capacity.~~

To ensure compliance with Standard Licence Condition 10(4), the CM must meet the relevant CM objectives, namely being objective, transparent, non-discriminatory and compliant with Regulation 2009/715/EC and any relevant binding decision of the European Commission and/or the Agency for the Cooperation of Energy Regulators.

Several principles of CMP are included in the CM and have applied from 1 November 2015 to meet the Standard Licence Condition requirement for compliance with relevant European decisions.

- *Capacity charges for oversubscription capacity*
The auction reserve price and general terms and conditions of the oversubscription capacity are the same as the auction reserve price and general terms and conditions of the capacity product to which the oversubscription capacity is added:

The capacity allocation mechanism for oversubscription capacity is the auctioning of capacity on the Prisma platform. Oversubscription capacity is firm forward flow capacity. The amount to be offered is determined in accordance with the CMP regulation.

- *Oversubscription capacity revenue account*
BBLC keeps an account of the cumulative revenues from oversubscription capacity sales minus the buy-back costs. At the end of the calendar year the oversubscription capacity revenues minus the buy-back costs will be split between the network users and BBLC up to a maximum deficit of € 100,000.
- *Maximum buy-back price*
In the event of a buy-back of capacity usage rights BBLC will accept offers from shippers that are no more than the maximum buy-back price. The maximum buy-back price is equal to the TTF and NBP OTC day-ahead spread as published daily by ICIS Heren. If the cost of

the buy-back auction is likely to exceed the maximum yearly deficit of € 100,000 the buy-back price will be adjusted proportionally with as a minimum the clearing price of the oversubscription capacity that has to be bought back.

- *Emergency buy-back price*
If insufficient capacity is offered to maintain system integrity, the required capacity will be bought back on a pro rata basis based on booked capacity under BBLC's General Terms & Conditions. In this event the reimbursement will be the same as the maximum buy-back price of the buy-back auction which preceded the pro rata buy-back.
- *Surrender of capacity and capacity from long-term use-it-or-lose-it for non-exempt capacity*
Reallocated surrendered capacity offsets the disposing shipper's payment obligation to BBLC to the extent of the revenue gained from the successfully reallocated capacity. Shippers retain their contractual rights and obligations until the capacity is reallocated and to the extent that the capacity is successfully reallocated. Revenues from reallocated LT-UIOLI capacity offset the disposing shipper's payment obligation to a maximum of the price originally paid for the capacity and to the extent the capacity has been reallocated successfully.

Capacity Allocation Mechanisms Network Code (CAM NC)

Effective on all available capacity from 1 November 2015.

Several elements of CAM are part of the CM as of 1st November 2015 to meet the Standard Licence Condition objective of compliance with relevant European decisions. The elements in the revised CM relating to CAM were implemented on 1st November 2015.

- *Capacity charges for ~~standard firm and interruptible forward flow~~ capacity products*
BBLC will offer standard firm and interruptible forward flow capacity products in accordance with the Network Code on CAM.

Interruptible forward flow capacity is offered for auction for the product for which firm capacity has been sold out.

- *Large and small price steps in the ascending clock auction*
The determination of the large price step will seek to minimise, as far as reasonably possible, the length of the auction process. The determination of the small price step will seek to minimise, as far as reasonably possible, the level of unsold capacity where the auction closes at a price higher than the reserve price. In addition to the information on PRISMA, BBLC will publish the price steps on its website in advance of the auction.

- *Payable price*
The payable price in a capacity auction is a fixed price, which means that the payable price will not be changed after the auction except for the annual indexation. The fixed price consists of the reserve price plus the auction premium, if any. The reserve price is set according to the CM described above. The reserve price is subject to annual indexation, the auction premium, if any, is not. Energy costs are invoiced separately based on the allocated use of capacity rights.

Harmonised Transmission Tariff Structures for Gas Network Code (TAR NC)

Effective on all available capacity (i.e. non-exempt capacity) from 1 January 2019 and existing contracts concluded after 6 April 2017.

Several elements of TAR NC will be part of the CM to meet the Standard Licence Condition objective of compliance with relevant European decisions. These principles are subject to the NRAs final approval of BBLC's TAR derogation application.

- Multipliers and seasonal factors

The level of the multipliers is subject to the range as described above. Where seasonal factors are applied, the arithmetic mean over the gas year of the product of the multiplier applicable for the respective standard capacity product and the relevant seasonal factors will be within the same range as for the level of the respective multipliers.

- Risk premium

According to TAR Article 17.2 where and to the extent that the transmission system operator functions under a price cap regime or applies a fixed payable price approach set out in Article 24(b), no revenue reconciliation shall occur and all risks related to under- or over-recovery shall be covered exclusively by the risk premium. In such case Articles 18, 19(1) to (4) and 20 shall not apply.

BBLC operates under a fixed payable price approach. Therefore, RP is the risk premium reflecting the benefits of certainty regarding the level of transmission tariff, where such premium shall be no less than 0.

- Tariff publication

BBLC will publish tariffs and will publish tariff related information on its website in so far derogation has not been approved by the NRAs.

No later than thirty days before the annual yearly capacity auction BBLC will publish the reserve prices for the yearly capacity products.

No later than thirty days before the annual yearly capacity auction BBLC will publish the maximum multipliers and resulting reserve prices for the upcoming gas year for all other capacity products. BBLC may reduce the reserve prices with a minimum notice period of one week for the quarterly and monthly capacity products, 3 hours for the day-ahead capacity product and 1 hour for the within-day capacity product.

- Interruptible capacity charges

BBLC applies an ex-ante discount based on the probability of interruption in line with Article 16.

Glossary

'alternative allocation mechanism' means an allocation mechanism for offer level or incremental capacity designed on a case-by-case basis by the transmission system operators, and approved by the national regulatory authorities, to accommodate conditional demand requests;

'auction premium' means the difference between the clearing price and the reserve price in an auction;

'fixed payable price' means a price calculated in accordance with TAR NC Article 24(b) where the reserve price is not subject to any adjustments;

'large price step' means a fixed or variable amount that is defined per interconnection point and standard capacity product;

'multiplier' means the factor applied to the respective proportion of the reference price in order to calculate the reserve price for a non-yearly standard capacity product;

'oversubscription capacity' means firm capacity offered in addition to the technical capacity of an interconnection point;

'seasonal factor' means the factor reflecting the variation of demand within the year which may be applied in combination with the relevant multiplier;

'small price step' means a fixed or variable amount that is defined per interconnection point and standard capacity product which is smaller than the large price step;

'reference price' means the price for a capacity product for firm capacity with a duration of one year;

'reserve price' means the eligible floor price in the auction.