To direct stakeholders

BBL Company V.O.F.
P.O. Box 225
9700 AE Groningen
The Netherlands
Concourslaan 17
T +31 (0)50 521 35 41
F +31 (0)50 521 35 45
E management@bblcompany.com
Trade register Groningen 02085020
www.bblcompany.com

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Our reference
BBL VOF 25.018

Subject
Consultation of the proposed modifications to BBLC's General Terms & Conditions (GT&C) and Charging Methodology (CM)

Dear Stakeholder,

BBL Company (BBLC) is proposing to make a number of modifications to its General Terms and Conditions (GT&C) and Charging Methodology (CM).

This consultation seeks your views on these proposed modifications and we invite you to submit a written response by Wednesday 30 April 2025. You can find further details on how to submit your response at the bottom of this letter.

Introduction

The alignment of GB and EU energy markets has continued in 2024 resulting in more stable spreads between the NBP and TTF markets. On the other hand, the general turmoil in the (energy) markets implies that the volatility of, and degree of uncertainty regarding, the NBP -TTF price spreads still remains significant. Also, the physical security of the BBL (offshore) assets has become an increasingly important topic which demands increased attention. At the same time it is BBLC's task to serve its shippers and to remain vigilant and pro-active regarding the flow direction of the BBL pipeline.

The regulatory environment surrounding the use and operation of the BBL pipeline is also demanding more attention. The introduction by the Dutch Authority Consumer and Market (ACM) of a continuation of an Inter TSO Compensation (ITC) from 1 October 2025 onwards, which is currently being appealed by BBLC, is an example of this.

Below we clarify the consultation topics.

1. Proposed modifications to the GT&C document

- The contract period is further clarified in the wording and now includes reference to shorter term products.
- Article 3.3 now includes text that clarifies that not fulfilling the conditions of the Implicit Allocation platform is a valid reason to terminate a BBL Shipper status. This was omitted in the current GT&C.
- Article 8.2 incorporates an extension of the planned maintenance window until 1st December. This extension is aligned with National Gas' UNC Modification Proposal 0907 which also seeks to extend its maintenance window from 1st March to 1st December.
- A new Article 8.6 is incorporated to explain more clearly under what circumstances a BBL Shipper is, or is not, reimbursed.
- Article 10.3 describes termination rights of a contract by a BBL Shipper in case of Force Majeure. It now states that, for contracts of a month or longer, the Force Majeure needs to be longer than 50% of the contract period before the BBL Shipper is allowed to terminate it. This change is being triggered to ensure a more balanced distribution of risk between all parties, reflecting our commitment to fairness and equitable treatment in unforeseen circumstances.
- Article 12.6 introduces an electronic invoicing system.
- Article 13.4 introduces a termination clause, including a notification period, should the situation arise where BBL Company finds itself in a situation where it is no longer financially viable to operate its facilities.

2. Proposed modifications to Exhibit G

- A further clarification of the definition of Weekend products.

3. Proposed changes to Exhibit I

- Some further clarification of a number of articles.

4. Proposed modifications to Charging Methodology (CM)

- Page 4 - The possibility to adjust multipliers in time. This, as an example, will give BBL Company the possibility to vary the level of daily tariffs within the multiplier range in case of a Balance of the Month product.
- Page 7 – As a result of a recent ACM decision BBLC will introduce a new ITC charge, to recover potential ITC costs, starting October 2025. According to the ACM decision, the ITC should reflect the costs that shippers would pay to Gasunie Transport Services (GTS) if Interconnection Point Julianadorp was still bookable. This fee, which is based on GTS' quarterly tariffs, will apply exclusively to allocations on bookings made from 1st October 2025. All capacity bookings made prior to 1st October 2025, will not be affected. Please note that BBLC has raised an appeal against ACM's decision. The final ruling on this appeal is

expected before 1st October 2025. BBLC will only implement this charge if it is legally obliged to pay an ITC to GTS.

- Page 9 - A further clarification of the calculation of the reimbursement to BBL Shippers in the situation where a Conditional Firm product is interrupted.
- Page 12 - The possibility to adjust tariffs for a Day Ahead product no later than 15.00 LET (Local European Time) instead of 6 hours before the Day Ahead product is auctioned.
- Page 12 - A specification of the allocation of BBL Company revenues out of the auction premium.

In addition to the above, a number of small administrative items have been incorporated.

Access Rules objectives

The proposed changes are described and highlighted in the attached ‘tracked-change’ documents. The proposed changes meet the requirements of applicable legislation and, therefore, are in line with the Access Rules objectives (SLC 11A(5)).

Process

The consultation period will run from Wednesday 2nd April 2025 through to Wednesday 30th April 2025. Please send your response to consultations@bblcompany.com.

Following consideration of any responses received BBLC will prepare a conclusion report in accordance with SLC 11A(11)(b) and SLC 10(11)(b) and submit it to Ofgem for approval.

Yours sincerely,

Rudi Streuper