

Energy Traders Europe comments on BBL GT&C & Charging Methodology 2025

Energy Traders Europe welcome the opportunity to comment on the consulted changes to BBL General Terms and Conditions (GT&Cs) and Charging Methodology for 2025. We appreciate the justification offered to each amendment proposal. Below we list some remarks regarding the amendments proposed.

In terms of amendments to the GT&Cs, we understand that art. 13.4 is added to address a situation where BBL Company would consider its activity as economically non-viable. **Introducing such a termination right exclusively for the benefit of BBLC is not acceptable from a shipper point of view.** To our understanding, it allows BBL to close down its business almost arbitrarily without compensating the shippers. Shippers do not have the right to cancel capacity contracts just because it is no longer profitable. We would also consider the Force Majeure Clause as reasonable and sufficient to cater for situations in which BBL is being released from contractual obligations. In addition, we underline the strategic importance of the interconnection linking two major European gas hubs, termination of which cannot happen with a 12-month notice period without causing a major disruption to the market.

In terms of changes to the Charging Methodology, the proposed amendments are another attempt to place the risks and uncertainties on the shippers, as it is unclear what the amount of the ITC charge would/could be in future. We also note that the proposed variable charge contains an F factor within the range of $<0; 1>$ suggesting that costs from the new ITC (if any) will be transferred in full or in part onto the shippers. We note that no timeline or place of publication of the F factor (or its subsequent alterations) was determined in the methodology, and we would appreciate further clarity in this respect.

Finally, we note that the adjustments to multiplier levels over time are explained with an example of BoM product offerings. While the amendments suggest that multipliers for *all* capacity products can be altered over time, the changes are still to respect the minimum notice period, hence we assume that the time adjustments in question relate to day-ahead multiplier alterations exclusively. We would appreciate your confirmation.

Contact

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