



To direct stakeholders

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Date

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Our reference

BBL VOF 26.23

Subject

Consultation of the proposed modifications to BBL
Company's General Terms & Conditions and Charging
Methodology

Dear Stakeholder,

As part of our annual review of the General Terms & Conditions ("GT&C"), we propose a number of updates intended to enhance clarity, modernise the documentation, and ensure closer alignment with evolving market needs. Accordingly, BBL Company ("BBLC") proposes several amendments to its GT&C and Charging Methodology ("CM").

This consultation invites stakeholders to provide their views on the proposed modifications. Stakeholders are encouraged to submit a written response by 6 May 2026. This letter sets out the background and objectives of the consultation, provides an overview of the proposed changes, and explains the consultation process. The detailed amendments are presented in the attached tracked-change documents.

BBLC operates the BBL interconnector as a merchant transmission system operator ("TSO"), providing cross-border gas transportation services between the Netherlands ("NL") and Great Britain ("GB"). In line with its regulatory obligations and business objectives, BBLC is committed to offering services and capacity products that enable efficient gas trade and respond to market needs, while safeguarding system integrity, operational efficiency, and security of supply. As a merchant TSO operating without regulated cost recovery, responsiveness to market signals is an inherent and necessary feature of BBLC's business model.

BBLC therefore seeks to align its services and product portfolio as closely as possible with market needs and demonstrated shipper demand, within the technical and operational capabilities of the BBL system. This market-driven approach applies to both flow directions and

requires BBLC to adapt its commercial and contractual conditions where market fundamentals materially change.

BBLC considers it therefore appropriate to further clarify one specific aspect in the context of this consultation related to the conditionality of its capacity products. Over recent years, BBLC has observed that shipper demand is almost exclusively focused on gas flows from GB to NL (reverse flow). There has been no sustained market interest in regular forward flow bookings from NL to GB (forward flow) for a considerable period of time, nor is such demand expected to structurally return. Given the persistent dominance of reverse flow demand, BBLC considers it appropriate to concentrate on offering firm reverse flow capacity throughout the year, thereby adjusting its set-up as a seasonal pipeline to a pipeline that better reflects current gas market realities.

BBLC therefore proposes to extend its firm reverse flow period from six (summer) months to a full year. Due to the physical and operational characteristics of the BBL system, firm reverse flow capacity cannot be offered simultaneously with firm forward flow capacity. In this context, forward flow capacity will be offered as conditional products¹ for a full year.

For clarity, the proposed conditionality of forward flow products does not imply that forward flow capacity bookings and/or nominations cannot be submitted or facilitated when the pipeline is physically operating in the reverse flow direction. Where forward flow and reverse flow nominations are submitted for the same delivery period, BBLC will accommodate such nominations by applying the existing netting principle and if necessary, its Net Nomination Tool ("NNT"), as further described in the GT&C and the Operating Manual. Furthermore, BBLC will continue to aim to follow prevailing market conditions and adjust its flow direction accordingly.

The criteria under which conditional forward flow capacity may become firm will remain unchanged compared to the current framework. The thresholds for firm forward flow capacity will continue to be determined on a seasonal basis, using two combined GB gas demand periods: Q4 and Q1 (winter) and Q2 and Q3 (summer). Given that the amended GT&C are proposed to enter into force in October 2026, BBLC will, for 2026 only, announce the applicable threshold for the period November 2026 to March 2027 before 1 November 2026. This threshold will apply to that entire period. For subsequent years, the threshold for the winter period will be published before 1 September. The threshold applicable to the period from April to September will continue to be announced before 1 March, in line with current practice.

While this letter focuses on the extension of the firm reverse flow period and, consequently, the structural offering of forward flow capacity on a conditional basis, this consultation also includes a broader range of proposed amendments. An overview of all consultation topics is provided below.

¹ Except for long-term forward flow contracts concluded prior to 1 November 2015, to which the GT&C changes will not automatically apply.

1. Proposed modifications to the GT&C (Main document)

BBLC proposes a number of clarifications and updates to the main body of the GT&C. These include:

- Deletion of the definition of “Capacity Restriction” since this has no further relationship in the text of the GT&C.
- Deletion of the definition of “Conditional Firm Reverse Flow” and other references throughout the GT&C.

2. Proposed modifications to Exhibit A (Operating Manual)

- In Article 2.1a.2 a further clarification on how confirmation messages are sent.
- In Article 4 a further clarification of the application of the ‘Prevail Rule’ and of the matching procedure has been incorporated into the text. BBLC is the TSO at Interconnection Point (“IP”) Bacton and to avoid misunderstanding with regards to matching procedures this paragraph has been adjusted.
- In Article 4.5 an adjustment has been made to get alignment with the description in the GT&C main document.
- In Article 5.4 the ENTSOG² transparency platform is mentioned as the source for publication of measured quantities.

3. Proposed changes to Exhibit B (Credit Control Protocol)

- The signing procedure of the Parent Company Guarantee has been adjusted. The dual signing procedure of both guarantor and BBLC has been adjusted to guarantor only.

4. Proposed modifications to Exhibit G (CAM NC³ and CMP GL⁴ implementation)

- Article A14 has been deleted as further clarified in the introduction of this document.
- Article A15 has been adjusted as further clarified in the introduction of this document.
- A further guidance is introduced in case BBLC is not able to publish the thresholds on its website.

5. Proposed modifications to Exhibit H (Reprofiling)

- BBLC proposes to increase flexibility under the “Reprofiling Service B” by allowing, for forward flow contracts concluded before 1st November 2015, the inclusion of Q4 capacity for reprofiling towards Q1 of the following gas year. These changes are intended to provide shippers with additional flexibility while maintaining a clear and transparent framework for reprofiling.

6. Proposed modifications to Exhibit I (Implicit Allocation Mechanism (“IAM”))

- No changes.

7. Proposed changes to Exhibit J (Implicit Allocation Guidance Document)

- A further clarification is given in the table to explain that IAM related information applicable to shippers is provided via PRISMA⁵.

8. Proposed modifications to the Charging Methodology

² ENTSOG: The European Network of Transmission System Operators for Gas, <https://transparency.entsog.eu>

³ CAM NC: The Network Code on Capacity Allocation Mechanisms

⁴ CMP GL: Congestion Management Procedures Guidelines

⁵ PRISMA: <https://www.prisma-capacity.eu>

- Section 4 - A further clarification of how to arrive at the variable fee for shippers. This now explicitly includes unaccounted-for-gas based on measurement deviations and gas leakage.
- Section 4 – Expanding the EPEX⁶ electricity spot price from a daily figure to a 7-day average figure which will lead to a more stabilised variable fee;
- BBLC proposes to shorten the notification period for both CAM as well as IAM Day ahead products from 15:00 LET to 15:30 LET;
- BBLC proposes to shorten the notification period for increases of the reserve price for Implicit Allocation products with a duration of equal or less than a month from 1 day to 1 hour;
- BBLC proposes to shorten the notification period for reserve price decreases for all Implicit Allocation products from 1 day to 1 hour.

Access Rules objectives

The proposed changes are described and highlighted in the attached tracked change documents. BBLC considers that the proposed amendments meet the requirements of applicable legislation and are therefore consistent with the Access Rules objectives (SLC 11A(5)).

Consultation process

The consultation period will run from **8 April 2026 through to 6 May 2026**. Please submit 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 ⁷ for approval.

If you require any further clarification regarding the consultation process, or if any of the topics set out in this letter require further explanation, please contact Rudi Streuper (Markets & Regulation Manager) at r.streuper@bblcompany.com and/or Mark van Dijken (Commercial Manager) at m.van.dijken@bblcompany.com.

Please note that BBLC will only take into account formal responses submitted to the above-mentioned email address when preparing the final consultation conclusions report.

We look forward to hearing from you.

Yours sincerely,



Mark van Dijken



Rudi Streuper

⁶ EPEX: The European Power Exchange EPEX SPOT, <https://www.epexspot.com/>

⁷ Ofgem: The Office of Gas and Electricity Markets, <https://ofgem.gov.uk>