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Terminal

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Brunsbüttel, 12 July 2019

Subject: Scenario Framework for 2020-2030 Gas Network Development Plan

Dear Madam, dear Sir,

On 17th June 2019 the German gas TSOs published the scenario framework for Gas NDP 2020-2030 for consultation. German LNG Terminal GmbH welcomes the opportunity to participate in the consultation process for the NDP 2020-2030. We are happy to notice that the scenario framework takes the potential new LNG terminal at Brunsbüttel into account when determining necessary transport capacities in the foreseen integrated German market area. This is of great importance, as certainty about firm entry capacity into the grid and thereby having firm access to the integrated German market area is relevant for our customers to enter into a long term contract with German LNG Terminal GmbH.

However, taking notice of the NDP 2020-2030 document as well as the discussions during the consultation session in Berlin on July 1st, it remains unclear whether the foreseen entry capacity into the grid at Brunsbüttel will be treated as unconditional firm capacity (Frei Zuordenbare Kapazität (FZK)), or that limitations will apply. In the NDP 2020-2030 (page 21), for planning purposes the FNB proposes to consider capacity for LNG-Terminals in competition with other yet to be defined entry points in the gas grid of GUD and OGE. Although it has not become clear at the aforementioned consultation meeting in Berlin what this could imply, it could result in a situation whereby entry capacity at Brunsbüttel is not always available and is characterised as BZK, bFZK or DZK¹. This potential unavailability is unacceptable for us as it has a negative impact on the customers of German LNG Terminal GmbH.

German LNG Terminal GmbH wants to stress that the availability of unconditional firm entry capacity (FZK) at Brunsbüttel is very important. It is unlikely that customers of the LNG terminal at Brunsbüttel are willing to enter into a long term

¹ BZK = beschränkt zuordenbare Kapazität; bFZK = bedingte feste frei zuordenbare Kapazität; DZK = dynamisch zuordenbare Kapazität.

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contract for a total value in the range of 50-100 million euros per year, and would additionally invest hundreds of millions of euros in the value chain for bringing LNG cargoes to Germany, if entry capacity into the German grid cannot be fully guaranteed.

In addition it should be noticed that the supply pattern for LNG coming to Germany will vary over the year and between years, so it is hard to predict when firm entry capacity will be needed. This supply pattern will only partly relate to supply of gas from other sources that might compete for the same transport capacity. As an example, Russian gas supply via Greifswald in a certain period of time will, amongst others, depend on (temperature dependent) demand in Northwest Europe and bottlenecks on (other) transport routes towards Europe, whereas LNG supply at Brunsbüttel, amongst others, depends on availability of liquified upstream gas, gas prices on the German hub(s), and gas prices elsewhere in the world. So it may very well be the case that from time to time both Russian gas at Greifswald and LNG supply at Brunsbüttel needs maximum transport capacity for transport to end-customers in Germany and neighbouring countries.

The need for unconditional firm entry capacity at Brunsbüttel is also substantiated by the latest version of the Gasnetzzugangsverordnung that reflects the aim of the German federal government to feed LNG into the German grid.

German LNG Terminal GmbH kindly asks the FNB to take into account the importance of unconditional firm entry capacity for LNG entering the German grid at Brunsbüttel when further developing the German NDP. German LNG Terminal GmbH is more than willing to share insights about the LNG-markets with the German gas TSOs and other relevant stakeholder and is looking forward for a fruitful cooperation.

Yours sincerely,

Rolf Brouwer
Managing Director