



To:
RAE
via
gasconsultation@rae.gr

Athens, 3 December 2021

No. RAD/ S.C. 188513/1736

Subject: Public Consultation of RAE concerning on the Terminal Use Agreement for the Alexandroupolis Independent Natural Gas System

Re: a. Announcement of RAE as of 11.11.2021
b. PPC/RAD/146742/1346/29.09.2021

Dear Sirs,

PPC would like to comment on the Alexandroupolis LNG Terminal Use Agreement released for public consultation by the Regulatory Authority of Energy as follows:

- Environmental responsibilities (13.d): As already explained in our Letter in ref. b, any environmental damages to the terminal may by no means be attributable to the terminal user since he has no control over the LNG discharge and handling process. Consequently, it is obvious that any environmental damage should be attributable either to the vessel operator or the terminal operator, as the case may be, on the basis of the actual events.
- Limitation of Terminal Operator Liability (14.2.b): A balanced, similar treatment of both the contracting parties as regards their maximum aggregate liability as a result of gross negligence or willful misconduct should be provided for in the contract.
- Terminal User's Guarantee (18.1.b): Under the currently prevailing market conditions it is practically impossible for the terminal user to replace the Bank Guarantee within the quite restrictive period of ten (10) Business Days provided for in the contract. An allowance of twenty (20) Business



Days for said replacement would be an acceptable and sensible period.

We remain at your disposal for any further clarifications.

Sincerely,

Gkatzou Evangelia
Director of Regulatory Affairs