

**TO:**  
Regulatory Authority for Energy (RAE)  
132 Piraeus Street  
118 54 Athens, Greece

Subject: Comments to document No. 382/11.10.2022 (RAE I-338138 /12.10.2022)

Dear Madam, Sir,

Please find below our comments:

1. Article 2, point 1:

- a. Taking into account DESFA's proposal on the Parameters of the Annual LNG Planning for 2023-2027, page 6, point (b): The approval process from the Ministry of Maritime Affairs and the preparation of the compatibility and risk study that will precede the evaluation of request of DESFA for the unloading of the LNG Cargo to FSU Ship-to-Ship has not defined duration in which it needs to be completed.
- b. As per our understanding, the Procedure described in Article 2 is a **one-off** Procedure and it will not take place before every LNG Application submitted by Users for unloading to the FSU. Moreover, the maritime area is specific, and the time period of Unloading is specified in Article 3.2. Therefore, DESFA should not have the obligation to submit a different application as the data included in the application remain the same.
- c. We kindly ask for a clarification as to whether the Procedure described in Article 2 will be done for every LNG Application, or is a one-off Procedure to be managed in advance by DESFA for the FSU? In case of the former, we request a clear time limit in order to ensure the proper time management essential to any LNG procurement and delivery.

2. Article 2, point 2:

- a. Referring to the text “relevant legislation that concerns maritime areas under the jurisdiction of Port Authorities / της κείμενης νομοθεσίας που αφορά σε θαλάσσιες περιοχές αρμοδιότητας των Λιμενικών Αρχών”, we kindly request clarification on whether this will be another approval that is part of every LNG Application or a one-off approval managed by DESFA for the FSU, and in case of the former, we request a clear time limit in order to ensure the proper time management essential to any LNG procurement and delivery.

3. Article 4:

- a. We would kindly ask for a clarification on exactly what steps are included in the full LNG Application approval process specific to the FSU (a table with steps and timeline associated to each step). The document mentions/includes various steps, but not in a coherent order.

4. Article 4, point 2:

- a. We suggest allowing a change of the LNG ship in the LNG Application, in case the substitute vessel has already Ship Shore Compatibility.

5. Article 4, point 3:

- a. We propose the following amendment to the text: "The requested LNG Quantity for Unloading to the FSU, cannot be less than 50.000 m3 of LNG... / Η αιτούμενη ποσότητα ΥΦΑ, προς Εκφόρτωση στην Πλωτή Δεξαμενή ΥΦΑ, δεν δύναται να υπολείπεται των 50.000 m3 ΥΦΑ...".

6. Article 5, point 3:

- a. We propose the following amendment to the text: "The Certification of an LNG ship is completed no later than ten (10) days after the submission for the necessary documentation to the Operator. / Η Πιστοποίηση του Πλοίου ΥΦΑ για την Εκφόρτωση στην Πλωτή Δεξαμενή ΥΦΑ, πραγματοποιείται εντός προθεσμίας δέκα (10) ημερών από την προσκόμιση του συνόλου των σχετικών εγγράφων και στοιχείων στον Διαχειριστή."

7. Article 5, point 4:

- a. We propose the following text to be deleted: "An LNG User with an approved LNG Application for Unloading to the FSU and a rejected Certification Application is not exempted from the obligations that derive for the approved LNG Application in accordance with the NNGTS Network Code and the relevant agreements signed with the Operator. / Χρήστης ΥΦΑ με Εγκεκριμένη Αίτηση ΥΦΑ για Εκφόρτωση στην Πλωτή Δεξαμενή ΥΦΑ, του οποίου η Αίτηση Πιστοποίησης απορρίφθηκε, κατά τα ανωτέρω, δεν απαλλάσσεται από τις υποχρεώσεις του που απορρέουν από την εν λόγω Εγκεκριμένη Αίτηση ΥΦΑ σύμφωνα με τον Κώδικα Διαχείρισης του ΕΣΦΑ και τις Συμβάσεις ΥΦΑ και Μεταφοράς, που έχει συνάψει με το Διαχειριστή."

- b. We believe there is no logical basis, and neither is this an accepted practice currently at Revithoussa or in other European terminals, to have the liability on the user for having the LNG vessel SSC cleared.

8. Article 7, point 2 (b):

- a. We propose the following text to be deleted (i.e. there to be no change in the current rules):  
“The time period of eighteen (18) Days of Par.6 of Article 86 for the Final Monthly LNG Vessel Unload Planning on behalf of the Operator, is set to twenty (20) Days. / το χρονικό όριο των δέκα οκτώ (18) Ημερών της παραγράφου 6 του άρθρου [86], για την κατάρτιση του Τελικού Μηνιαίου Προγράμματος εκ μέρους του Διαχειριστή, ορίζεται σε είκοσι (20) Ημέρες.”.

Yours sincerely,

**MET Energy Trading Bulgaria EAD**