



## Draft decision

**Draft decision by the Netherlands Authority for Consumers and Markets (ACM) of 1 March 2018, reference ACM/ UIT/490522, to amend the tariff structures and terms and conditions as referred to in Articles 12a and 12b of the Dutch Gas Act concerning the implementation of Commission Regulation (EU) 2017/460 of 16 March 2017 establishing a network code on harmonised transmission tariff structures for gas (NC-TAR)**

Our reference : ACM/UIT/490522

Case number : ACM/14/023224

Date : 1 March 2018

The Netherlands Authority for Consumers and Markets,

In view of Article 12f, first paragraph, of the Dutch Gas Act;

In view of Article 27, fourth paragraph, of NC-TAR;

In view of Article 28, first paragraph, of NC-TAR;

Decides:

### Article I

The Tariff Code shall be amended as follows:

A

Article 1.2.1 shall read as follows:

Terms defined in [Regulation 715/2009](#), NC-BAL, NC-CAM, NC-TAR, [Dutch Gas Act](#) or in the Gas Code of Definitions, have the meaning defined in the [Regulation 715/2009](#), NC-BAL, NC-CAM, NC-TAR, Dutch Gas Act, or Gas Code of Definitions.

B

Chapter 3 shall read as follows:

### 3. Transmission System Operator

#### 3.1. General

##### 3.1.1

The allowed revenues of the network operator of the national gas transmission grid as referred to in Article 3, under 11, of NC-TAR are the revenues as determined annually in accordance with the decision as referred to in Article 82, fifth paragraph, of the Dutch Gas Act. This is except for revenues obtained from the implementation of tasks as referred to in Article 10a, first paragraph, part a and part p, of the Dutch Gas Act.

##### 3.1.2

The allowed revenues of the network operator of the national gas transmission grid as referred to in 3.1.1 shall solely and exclusively be collected through capacity-based entry and exit tariffs.

### 3.1.3

The network operator of the national gas transmission grid shall not generate revenues through commodity-based tariffs or non-transmission tariffs as referred to in Article 4, third paragraph, or Article 4, fourth paragraph respectively, of NC-TAR.

### 3.1.4

The costs for processing or treating gas as referred to in Article 10a, first paragraph, part p, of the Dutch Gas Act shall be collected via the tariffs described in 3.3.

## 3.2 Entry and exit tariffs

### 3.2.1 General

#### 3.2.1.1

The entry and exit tariffs shall be expressed in euros per contracted entry or exit capacity per duration of the contract, with the contracted capacity expressed in kWh/hour.

#### 3.2.1.2

The entry and exit tariffs shall be derived from the reference price as referred to in Article 3, under 1, of NC-TAR, which applies to the entry or exit point in question.

### 3.2.2 Reference price methodology

#### 3.2.2.1

The non-adjusted reference price is the reference price before adjustments as referred to in Article 6, fourth paragraph, of NC-TAR.

#### 3.2.2.2

The non-adjusted reference price shall be calculated as follows:

$$\tilde{T}_{EN} = \frac{V \times TI}{\sum_{i \in EN} CAP_i}$$

$$\tilde{T}_{EX} = \frac{(1 - V) \times TI}{\sum_{i \in EX} CAP_i}$$

Where:

$\tilde{T}_{EN}$  is the non-adjusted reference price that applies to an entry point expressed in euros/kWh/hour/year;

$\tilde{T}_{EX}$  is the non-adjusted reference price that applies to an exit point expressed in euros/kWh/hour/year;

$V$  is the percentage of the allowed revenues of the network operator of the national gas transmission grid that must be collected via the entry tariffs, as set down in 3.2.2.3;

$TI$  is the allowed revenues of the network operator of the national gas transmission grid expressed in euros;

$CAP_i$  is the forecasted contracted capacity of entry or exit point  $i$  expressed in kWh/hour/year;  
and

$EN$  is the collection of entry points; and  
 $EX$  is the collection of exit points.

### 3.2.2.3

The split of the allowed revenues from entry and exit capacity is as follows: 50% of the allowed revenues of the network operator of the national gas transmission grid shall be collected via the entry tariffs, 50% of the allowed revenues of the network operator of the national gas transmission grid shall be collected via the exit tariffs.

### 3.2.2.4

The non-adjusted reference prices shall be adjusted on the basis of Article 6, fourth paragraph, of NC-NC-TAR, by first applying a discount of 50% to the non-adjusted reference price that applies to an entry point from or an exit point to a storage facility and then by rescaling the non-adjusted reference prices of all entry and exit points. The following formulas apply for the adjustments:

$$\Delta TI = GK \times \left( \tilde{T}_{EN} \times \sum_{i \in EN_G} CAP_i + \tilde{T}_{EX} \times \sum_{i \in EX_G} CAP_i \right)$$

$$c = \frac{TI}{TI - \Delta TI}$$

$$T_{EN}^{NG} = c \times \tilde{T}_{EN}$$

$$T_{EN}^G = GK \times c \times \tilde{T}_{EN}$$

$$T_{EX}^{NG} = c \times \tilde{T}_{EX}$$

$$T_{EX}^G = GK \times c \times \tilde{T}_{EX}$$

Where:

$\Delta TI$  is the loss of revenue resulting from the discount to the non-adjusted reference prices that apply to entry points from and exit points to a storage facility, expressed in euros;

$GK$  is the percentage discount to the non-adjusted reference prices that apply to entry points from and exit points to storage facilities, as set down in 3.2.2.4;

$\tilde{T}_{EN}$  is the non-adjusted reference price that applies to an entry point expressed in euros/kWh/hour/year;

$EN_G$  is the collection of entry points from storage facilities;

$CAP_i$  is the forecasted contracted capacity of entry or exit point  $i$  expressed in kWh/hour/year;

$\tilde{T}_{EX}$  is the non-adjusted reference price that applies to an exit point expressed in euros/kWh/hour/year;

$EX_G$  is the collection of exit points to storage facilities;

$c$  is the constant for rescaling the non-adjusted reference price;

$TI$  is the allowed revenues of the network operator of the national gas transmission grid expressed in euros;

$T_{EN}^{NG}$  is the reference price that applies to an entry point other than an entry point from a

$T_{EN}^G$  storage facility, expressed in euros/kWh/hour/year;  
 is the reference price that applies to an entry point from a storage facility, expressed in euros/kWh/hour/year;

$T_{EX}^{NG}$  is the reference price that applies to an exit point other than an exit point to a storage facility, expressed in euros/kWh/hour/year; and

$T_{EX}^G$  is the reference price that applies to an exit point to a storage facility, expressed in euros/kWh/hour/year.

*3.2.3 Calculation of reserve prices that apply to interconnection points and payable prices that apply to domestic entry and exit points*

3.2.3.1.

The reserve prices for firm yearly, quarterly, monthly, daily and within-day capacity products shall be calculated as stated in 3.2.3.3 to 3.2.3.7.

3.2.3.2

For domestic entry and exit points, the payable price for yearly, quarterly, monthly, daily, and within-day capacity products shall be calculated in the same way as referred to in 3.2.3.1. Supplementary to this, the provisions of 3.2.3.8 shall apply to the price payable for contracting a combination of different capacity products at domestic entry and exit points.

3.2.3.3

The reserve price for a firm yearly capacity product is equal to the reference price. The reserve price for a yearly capacity product that covers more than one calendar year is equal to the weighted average of the reference prices for the two calendar years in question, with the weighting being determined by the number of months per calendar year.

3.2.3.4

The reserve prices for quarterly, monthly, daily, and within-day capacity products are calculated by applying multipliers and seasonal factors to the reference prices in accordance with Articles 14 and 15 of NC-TAR.

3.2.3.5

The multiplier referred to in 3.2.3.4 is:

- a. 1.25 for quarterly capacity products;
- b. 1.5 for monthly capacity products;
- c. 2.5 for daily capacity products; and
- d. 2.5 for within-day capacity products.

3.2.3.6

The seasonal factors as referred to in 3.2.3.4 for quarterly capacity products are:

Quarter	Seasonal factors for quarterly capacity products
January - March	1.544
April - June	0.695
July - September	0.542
October - December	1.219

3.2.3.7

The seasonal factors as referred to in 3.2.3.4 for monthly, daily, and within-day capacity products are:

<b>Month</b>	<b>Seasonal factors for daily and within-day capacity products</b>	<b>Seasonal factors for monthly capacity products</b>
January	1.830	1.737
February	1.759	1.670
March	1.292	1.226
April	0.888	0.843
May	0.693	0.658
June	0.613	0.582
July	0.567	0.539
August	0.540	0.513
September	0.605	0.575
October	0.807	0.766
November	1.320	1.253
December	1.725	1.638

3.2.3.8

If a network user at domestic entry and exit points contracts entry or exit capacity at an entry or exit point on the same day in a combination of quarterly, monthly, and daily capacity products, the network operator of the national gas transmission grid shall, at the request of the network user, for each tranche of the same quantity of contracted entry or exit capacity:

- a. Maximise the payable price for the combination of contracted quarterly, monthly, and daily capacity products within the duration of a yearly capacity product at the payable price for the yearly capacity product in question;
- b. Maximise the payable price for a combination of contracted monthly and daily capacity products within one gas quarter at the payable price for the quarterly capacity product for the gas quarter in question; and
- c. Maximise the payable price for a combination of contracted daily capacity products within one gas month at the payable price for the monthly capacity product for the gas month in question.

3.2.3.9

The payable price for exit capacity contracted in accordance with 2.1.2d and 2.1.2e of the Transmission Code Gas TSO, for each recognised programme-responsible party per network area per month, is equal to:

- a. the payable price for the monthly capacity product for the part of the capacity that is contracted as a monthly capacity product;
- b. the payable price for the quarterly capacity product divided by three, for the part of the capacity that is contracted as a quarterly capacity product; and
- c. the payable price for the yearly capacity product divided by twelve, for the part of the capacity that is contracted as a yearly capacity product.

3.2.3.10 Compensation for interruptible capacity

In the event that a network user has contracted interruptible capacity and is interrupted, the network user shall be compensated in accordance with the ex-post discount as stated in the fourth paragraph of Article 16 of NC-TAR. This ex-post discount shall not apply in the event of an interruption to

contracted entry or exit capacity as a result of maintenance or transmission restrictions as referred to in Section 4.4 of the Transmission Code Gas TSO.

#### 3.2.3.11 Discount on wheeling capacity

The payable price for entry and exit capacity in the form of wheeling capacity, as referred to in Article 2.1.2h of the Transmission Code Gas TSO, shall be calculated by:

- a. Determining the entry and exit tariff that a network user owes for contracting both firm entry and exit capacity at the entry and exit point in question for the same capacity products; and
- b. Applying a discount of 94% on the value calculated on the basis of part a.

#### 3.2.3.12 Tariff for exceeding contracted entry or exit capacity

If the contracted entry or exit capacity is exceeded, the network operator of the national gas transmission grid shall charge the network user a tariff for exceeding the contracted entry or exit capacity. The excess shall be determined for each gas day and set at the greatest amount exceeded in an hour. The tariff for the excess is equal to the tariff for a monthly capacity product for the month in which the excess occurred. No tariff will be charged for exceeding contracted exit capacity in accordance with [2.1.2b of the Transmission Code Gas TSO](#). In the event that exceeding the contracted entry or exit capacity is the result of an instruction by the network operator of the national gas transmission grid, as referred to in [Article 4.4.6 of the Transmission Code Gas TSO](#), no tariff will be charged for any such excess.

### **3.3 Tariff structure for processing, treating, and mixing gas in accordance with Article 10a, first paragraph, part p of the Dutch Gas Act**

#### 3.3.1

The description of the service is included in 2.2.1 of the Transmission Code Gas TSO.

#### 3.3.2. Cost components

The tariffs for the service described in [3.3.1](#) serve to cover the cost components related to this service.

- a. The tariff is calculated in consideration of the following elements, to the extent that they apply:
  - 1°. capital costs including at least the costs related to the financing of investments for the benefit of the service, such as the reasonable yield, the investment amount, and the depreciation period being applied;
  - 2°. operational costs, including at least the direct costs and indirect costs (allocated using an allocation ratio) for the management and maintenance of investments and costs of operation, including the costs related to the use of the service, such as the use of energy and nitrogen and any resources that may need to be deployed; and
  - 3°. other costs, including the direct costs and indirect costs (allocated using an allocation ratio) that do not belong to the aforementioned categories.
- b. A qualitative explanation will be given for the choice of the allocation ratios applied in the tariff.
- c. The tariff may consist of fixed and variable elements.
- d. The tariff may be charged to end users as one payment or may be spread over various periods. Separate agreements shall be made regarding the period in which the service is available and how the costs are to be spread.

## Article II

The Transmission Code Gas TSO will be amended as follows:

A.

Article 1 shall read as follows:

### 1. Scope and definitions

This code contains conditions relating to the transmission service and the gas processing, treatment and mixing service, as referred to in Article 10a, first paragraph, under p of the Dutch Gas Act. Terms defined in [Regulation 715/2009](#), NC-BAL, NC-CAM, NC-TAR, [Dutch Gas Act](#) or in the Gas Code of Definitions, have the meaning defined in the [Regulation 715/2009](#), NC-BAL, NC-CAM, NC-TAR, Dutch Gas Act, or Gas Code of Definitions.

B.

Article 2.1.1 shall read as follows:

Article 2.1.1

Transmission shall occur in accordance with an agreement concluded with the network operator of the national gas transmission grid, which entails the network operator of the national gas transmission grid taking gas supplied at an entry point on the national gas transmission grid and making gas available at an exit point. Entry capacity and exit capacity may be contracted independently of each other with the network operator of the national gas transmission grid.

C.

In Article 2.1.2, the first paragraph after “Description of the service” is substituted with:

#### *Description*

Contracted entry capacity grants the right to feed a quantity of gas per hour into the national gas transmission grid at an entry point. Contracted exit capacity is the right to extract a quantity of gas per hour from the national gas transmission grid at an exit point.

D.

In Article 2.1.2, the second paragraph, from “Contracting and allocation” is substituted with:

#### *Contracting and allocation*

Entry and exit capacity are available in different capacity products. The capacity products differ with regard to the start date and start time, the duration for which entry or exit capacity is contracted, and the price that applies to the capacity product.

At interconnection points, the network operator of the national gas transmission grid provides, in accordance with Article 9 of NC-CAM, standard yearly capacity products, standard quarterly capacity products, standard monthly capacity products, standard daily capacity products, and standard within-day capacity products. These standard capacity products are contracted and allocated to recognised programme-responsible parties by auction, as laid down in NC-CAM.

At domestic entry and exit points, a distinction is made between yearly capacity products, quarterly capacity products, monthly capacity products, daily capacity products, and within-day capacity products. Yearly, quarterly, monthly, daily, and within-day capacity products have the same start date, start time, and duration at domestic entry and exit points as the standard capacity products as described in Article 9 of NC-CAM, with the exception of the start date of yearly capacity products,

which can be on the first day of any month of the year. These capacity products are contracted and allocated to recognised programme-responsible parties or connected parties on a first-come-first-served basis.

E.

In Article 2.1.2, the third paragraph, from “Interruptible service”, is substituted with:

*Interruptible entry and exit capacity*

Entry and exit capacity can be offered by the national gas transmission network operator in the form of interruptible transmission capacity. Contracted interruptible entry capacity grants a provisional right to feed a quantity of gas per hour into the national gas transmission grid at an entry point. Contracted interruptible exit capacity grants a provisional right to extract a quantity of gas per hour from the national gas transmission grid at an exit point. The network operator of the national gas transmission grid only offers interruptible entry capacity or exit capacity if firm entry capacity or firm exit capacity is no longer available. Interruptible entry or exit capacity can only be used if the network users of the national gas transmission grid who have firm entry or exit capacity at the entry or exit point in question at their disposal or have previously contracted interruptible entry or exit capacity, do not (fully) use their entry capacity or exit capacity, respectively. If this condition is not met, the network user at the entry or exit point in question may be interrupted. The interruption shall be carried out in the sequence of the timestamps determined in 5.1.6, and in the case of identical timestamps, in proportion to the nominations.

F.

In Article 2.1.2, “not interruptible” in the fourth paragraph is substituted with “firm”, and “entry and exit points other than an interconnection point” with “domestic entry and exit points”.

G.

Article 2.1.2b shall read as follows:

Article 2.1.2b

For all exit points that connect the national gas transmission grid and a regional gas distribution grid, the network operator of the national gas transmission grid shall jointly determine the planning parameters and publish them on its website prior to each calendar year. The planning parameters cover planned capacity, the planned capacity of profile end-users, the standard capacity of profile end-users, the planned capacity of telemetry industrial users, and the exit capacity needed for peak supply, as referred to and in the circumstances described in [Article 2, first paragraph, of the Decision in Relation to Security of Supply Pursuant to the Dutch Gas Act](#). The network operator of the national gas transmission grid publishes the way in which the planning parameters are determined in the document as referred to in [Article 8, second paragraph, of the Dutch Gas Act](#). In the case of the provision as referred to in the foregoing two sentences, the sum of the planning capacity of profile end-users and the planning capacity of telemetry industrial users equals the planning capacity. Supplementary to [2.1.2](#), the standard capacity of profile end-users plus the planning capacity of telemetry industrial users is entirely contracted by the jointly recognised programme-responsible parties with LB recognition. The standard capacity of profile end-users and planning capacity of telemetry industrial users shall be contracted in the form of firm exit capacity according to the least expensive combination of yearly, quarterly, and monthly capacity products for recognised programme-responsible parties with LB recognition. The network operator of the national gas transmission grid shall distribute the standard capacity of profile end-users, plus the planning capacity of telemetry industrial users among the recognised programme-responsible parties with LB recognition on the basis of data from the regional network operators' connection registers, according to the methodology of [2.1.2d](#) or [2.1.2e](#),

respectively. The contracted yearly, quarterly, and monthly capacity products will be distributed monthly pro rata. This means that the firm exit capacity for each recognised programme-responsible party per network area per month contracted in accordance with 2.1.2d and 2.1.2e, can consist of a combination of contracted yearly, quarterly, and monthly capacity products.

H.

Article 2.1.2h shall read as follows:

#### 2.1.2h Wheeling capacity

##### *Description of wheeling*

At entry and exit points situated at the same location, the network operator of the national gas transmission grid provides wheeling capacity, in addition to the entry and exit capacity described in 2.1.2. Wheeling capacity refers to the combination of entry and exit capacity at an entry and exit point situated at the same location. Contracted wheeling capacity grants the right to feed a quantity of gas per hour into the national gas transmission grid at an entry point, and to extract it at an exit point at the same location from the national gas transmission grid at a reduced entry and exit tariff. The quantity of gas being fed in an hour has to be equal to the quantity of gas being extracted in the same hour. The contracted wheeling capacity shall be recorded in a separate portfolio by the network operator of the national gas transmission grid.

##### *Contracting and allocation*

Wheeling capacity is contracted and allocated to recognised programme-responsible parties on a first-come-first-served basis. Since 1 January 2014, it has not been possible to contract wheeling capacity between a domestic entry or exit point and an interconnection point. Wheeling capacity contracted before 1 January 2014 shall be respected. The network operator of the national gas transmission grid only offers wheeling capacity if the offered wheeling capacity does not affect the offered entry and exit capacity as referred to in Article 2.1.2. Wheeling capacity can be distinguished in the same capacity products as entry and exit capacity, as referred to in 2.1.2. The combination of entry and exit points for which wheeling capacity is offered is published by the network operator of the national gas transmission grid on its website.

##### *Interruptible wheeling capacity*

Wheeling capacity may be offered by the network operator of the national gas transmission grid as interruptible capacity. Contracted interruptible wheeling capacity grants the provisional right to feed a quantity of gas per hour into the national gas transmission grid at an entry point, and to extract this gas at an exit point situated at the same location from the national gas transmission grid. The quantity of gas being fed in an hour shall be equal to the quantity of gas being extracted in the same hour. The network operator of the national gas transmission grid only provides interruptible wheeling capacity if firm entry wheeling capacity is no longer available. Interruptible wheeling capacity may only be used if the network users of the national gas transmission grid who have firm entry capacity, firm exit capacity, or firm wheeling capacity, previously contracted interruptible entry capacity or previously contracted interruptible exit capacity respectively or previously contracted interruptible wheeling capacity at their disposal at the entry and exit point in question, do not (fully) use their entry capacity, exit capacity, or wheeling capacity. If this condition is not met, the network user may be interrupted. The interruption shall be carried out in the sequence of the timestamps set down in 5.1.6.

##### *Other conditions*

As more existing firm wheeling capacity becomes available, the network operator of the national gas transmission grid shall immediately upgrade the contracted interruptible wheeling capacity to firm wheeling capacity on domestic entry and exit points, in compliance with 2.1.12. The upgrading shall be carried out in the sequence of the timestamps set down in 5.1.6.

I.

Article 2.1.3 is deleted.

J.

Article 2.1.5 is deleted.

K.

Article 2.1.6 is deleted.

L.

Article 2.1.7.1 shall read as follows:

2.1.7.1.

Diversion concerns the right of a recognised programme-responsible party to divert contracted entry capacity or exit capacity to another entry point or exit point respectively at the same location, on condition that no extra load is placed on the transmission capacity.

M.

Article 2.1.7.2 shall read as follows:

2.1.7.2

Diversion of contracted capacity shall be requested using a form published by the network operator of the national gas transmission grid on its website. The network operator of the national gas transmission grid publishes on its website the combinations of entry and exit points for which diversion is provided.

N.

In Article 2.1.7.3, “an entry or exit point to which the first-come-first-served principle applies” is substituted with “a domestic entry or exit point”.

O.

In Article 2.1.7.3, final sentence, “may be contracted for a month, a quarter, or a year” is substituted with “a yearly , quarterly, or a monthly capacity product may be contracted”.

P.

In Article 2.1.7.4, “the month factor that applies” in the fourth paragraph is substituted with “the multipliers and seasonal factors that apply”.

Q.

Article 2.1.8 shall read as follows:

2.1.8 Shift of capacity

*Description*

Shift of capacity gives the right to transfer exit capacity from an exit point to another exit point for a certain period, but only if exceptional temporary circumstances of an operational nature justify the transfer in question.

*Contracting and allocation*

Requests for a shift of capacity are assessed by the network operator of the national gas transmission grid.

*Other conditions*

The status of exit capacity that has been transferred through shifting shall not be affected, unless such transfer were to affect the status of the exit capacity of another recognised programme-responsible party.

R.

The title of Article 2.1.9 shall read as follows:

2.1.9 Adjusting contracted exit capacity when starting up or expanding gas installations.

S.

Article 2.1.9.1 shall read as follows:

When starting up or expanding gas installations of an end-user with a connection to the national gas transmission grid, a recognised programme-responsible party or connected party with exit capacity may request the network operator of the national gas transmission grid to initially contract an estimated quantity of exit capacity for a period of no more than four months, and to adjust the contracted exit capacity at the end of said period to the maximum used capacity per month. This request may not relate to a winter month.

T.

In Article 2.1.9.2, the first sentence is substituted with:

The adjustment or expansion as referred to in Article 2.1.9.1 shall be determined in a separate agreement between the network operator of the national gas transmission grid on the one hand and the recognised programme-responsible party or connected party with exit capacity on the other, which shall include the estimated exit capacity.

U.

Article 2.1.9.4 shall read as follows:

2.1.9.4

The transfer of transmission capacity or the transfer of usage rights in accordance with 2.1.10 for the estimated exit capacity, as referred to in Article 2.1.9.2, is only possible for the total estimated exit capacity and for the whole period for which the exit capacity is estimated.

V.

In Article 2.1.9.5, the first sentence is substituted with:

After the end of the period of no more than four months for which the exit capacity has been estimated, the network operator of the national gas transmission grid shall determine, for each gas month of the period, a value for the exit capacity in the gas month in question.

W.

In Article 2.1.9.5, "Article 3.2.1.4" is substituted with "the provisions of Section 3.2.3".

X.

In Article 2.1.9.6, the first sentence is substituted with:

In the case of exceeding the estimated exit capacity for which the recognised programme-responsible

party or connected party with exit capacity requested, but has not obtained, permission, or for which prior permission was required but not requested, the excess shall be designated as an excess as referred to in [Article 3.2.3.12 of the Tariff Code Gas](#), and be charged as such after the end of the period of no more than four months for which the exit capacity was estimated.

Y.

In Article 2.1.10.1, the first sentence is substituted with:

A recognised programme-responsible party or connected party with exit capacity has the right to transfer contracted transmission capacity or the usage rights of transmission capacity (hereinafter: usage rights) to another recognised programme-responsible party or connected party with exit capacity.

Z.

In Article 2.1.10.1, “booked” is substituted with “contracted”

AA.

In Article 2.1.10.7, “The diversion service” is substituted with “Diversion”

BB.

Article 2.1.12 shall read as follows:

2.1.12

The network operator of the national gas transmission grid shall upgrade contracted interruptible transmission capacity as described in 2.1.2 and 2.1.2h to firm contracted transmission capacity, unless the recognised programme-responsible party states no later than five working days after concluding the agreement in question with the network operator of the national gas transmission grid that, for the purpose of this agreement, it does not wish to have its contracted interruptible transmission capacity upgraded.

CC.

Article 2.1.14 is amended as follows:

1. In the title, “Surrender of contracted capacity” is substituted with “Surrender of contracted entry and exit capacity”
2. In the text, every occurrence of the term “(backhaul)” is deleted
3. In the text, “non-interruptible” is substituted with “firm”.

DD.

In Article 2.1.15.1, “non-interruptible” is substituted with “firm”

EE.

Section 2.2 is deleted

FF.

The numbering of Article 2.2a, 2.2a.1, and 2.2a.2 is amended to 2.2, 2.2.1, and 2.2.2.

GG.

In Article 2.2a.2, “3.3.8.2” is substituted with “3.3.2”

HH.

Article 3.2.1 shall read as follows:

### 3.2.1

The network operator of the national gas transmission grid handles three separate types of recognition for a recognised programme-responsible party.

LA recognition: legal persons and natural persons with this recognition may contract transmission capacity with the network operator of the national gas transmission grid, except for exit capacity at an exit point between the national gas transmission grid and a regional gas distribution grid. Legal persons or natural persons with this recognition can also trade gas at the virtual trading point. In addition to the requirements stated under [3.2.0a to 3.2.0d](#), the following conditions apply:

- a. the party shall have an EAN code in case the party bears programme responsibility at a domestic exit point;
- b. the party shall be able to communicate with the network operator of the national gas transmission grid using the B2B online information service.

LB recognition: legal persons and natural persons with this recognition may contract transmission capacity with the network operator of the national gas transmission grid, including exit capacity at an exit point between the national gas transmission grid and a regional gas distribution grid. Legal persons or natural persons with this recognition can also trade gas at the virtual trading point. In addition to the requirements stated under [3.2.0a to 3.2.0d](#), the following conditions apply:

- a. the party shall have an EAN code;
- b. the party shall take part in the exchange of messages in relation to allocation;
- c. the party contracts exit capacity in accordance with [2.1.2b](#);
- d. the party shall be able to communicate with the network operator of the national gas transmission grid using the B2B online information service.

LC recognition: legal persons and natural persons with this recognition may not contract transmission capacity with the network operator of the national gas transmission grid. Legal persons or natural persons with this recognition may only trade gas at the virtual trading point. Apart from the requirements stated under [3.2.0a to 3.2.0d](#), there are no other conditions that apply.

### II.

In Article 3.3.1, “service” is substituted with “transmission capacity”.

### JJ.

In Article 3.3.2, “services” is substituted with “transmission capacity”.

### KK.

In Article 3.4.2, “the services” is substituted with “the other services”.

### LL.

In Article 4.1.6.4, “Our minister” is substituted with “the minister”.

### MM.

In Article 4.4.1, “the execution of services” is substituted with “the transmission capacity”.

### NN.

In Article 4.4.1, every occurrence of “services” is substituted with “the transmission capacity”.

### OO.

In Article 4.4.1, “entry and exit capacity” is substituted with “transmission capacity”.

### PP.

In the first paragraph of Article 4.4.2, “service” is substituted with “contracted transmission capacity”.

QQ.

In the third paragraph of Article 4.4.2, “service” is substituted with “transmission capacity”.

RR.

In Articles 4.4.4 and 4.4.6, every occurrence of “non-interruptible” is substituted with “firm”.

SS.

The title of Chapter 5 shall read as follows:

5. Transmission agreements.

TT.

The title of Section 5.1 shall read as follows:

5.1. Entering into transmission agreements.

UU.

Article 5.1.1 is amended by changing “a service” in the first sentence to “transmission capacity”.

VV.

Article 5.1.1 is amended by deleting “of the service” from the second sentence.

WW.

In Article 5.1.1, “services” is substituted with “transmission capacity”.

XX.

In Article 5.1.1, the final sentence is deleted.

YY.

Article 5.1.2 shall read as follows:

An agreement concerning a daily capacity product may be concluded up to the moment the gas day starts.

ZZ.

Article 5.1.3 shall read as follows:

5.1.3

The network operator of the national gas transmission grid shall allocate transmission capacity to interested parties on the basis of transparency, non-discrimination, and efficient use of the national gas transmission grid. Chapter 2 states how the transmission capacity is allocated to interested parties by the network operator of the national gas transmission grid.

AAA.

In Article 5.1.4, “a service” is substituted with “transmission capacity”.

BBB.

Article 5.1.6 shall read as follows:

5.1.6

The network operator of the national gas transmission will give every complete request a timestamp upon receipt. The network operator will use this timestamp, in the case of interruptible transmission

capacity, for determining the interruption sequence. A complete request shall at least include the capacity product, the entry point or exit point if relevant, the identity of the interested party, and, if relevant, an indication of whether said party accepts interruptible transmission capacity.

CCC.

Section 5.2 is deleted in its entirety.

DDD.

The title of Section 5.3 shall read as follows: Consequences of termination of transmission agreements.

EEE.

Article 5.3.1 is amended by substituting “services” with “transmission”.

FFF.

Article 5.3.1 is amended by substituting “agreement” with “transmission agreement”.

GGG.

In the table in Article 6.3, “Non-interruptible” is substituted with: “Firm”.

HHH.

In the table of Article 6.3, the information relating to “Backhaul entry or exit capacity” is deleted in its entirety.

III.

Article 6.4 is deleted.

JJJ.

In Article B1.5 of Annex 1, “services” is substituted with “entry and exit capacity”.

KKK.

In Annex 2, every occurrence of “non-interruptible” is substituted with “firm”.

LLL.

The title of B2.3.3 shall read as follows: Gas quarter ahead.

### **Article III Gas Code of Definitions**

The Gas Code of Definitions is amended as follows:

A.

In Article 1.1, the definition of *interruptible* is amended to “relates to transmission capacity and indicates that the transmission capacity can be interrupted by the network operator of the national gas transmission grid”;

B.

In Article 1.1, the definitions *backhaul*, *gas storage entry point*, and *gas storage exit point* are deleted.

C.

To Article 1.1 is added the definition *domestic entry point*: an entry point other than an interconnection point.

D.

To Article 1.1 is added the definition *domestic exit point*: an exit point other than an interconnection point.

E.

To Article 1.1 is added the definition *entry tariff*: the tariff payable by a network user to the network operator of the national gas transmission grid for contracting entry capacity.

F.

To Article 1.1 is added the definition *exit tariff*: the tariff payable by a network user to the network operator of the national gas transmission grid for contracting exit capacity.

G.

To Article 1.1 is added the definition *gas quarter*: the period that starts at 06.00 on the first day of a quarter and that ends at 06.00 on the first day of the following quarter, and where the first day of a quarter is 1 January, 1 April, 1 July, or 1 October.

H.

To Article 1.1 is added: *NC-TAR*: Commission Regulation (EU) 2017/460 of 16 March 2017 establishing a network code on harmonised transmission tariff structures for gas.

I.

In Article 1.1, “*Our Minister*: Our Ministry of Economic Affairs” is substituted with: *The Minister*; The Minister of Economic Affairs and Climate Policy.

J.

In Article 1.1, the definition *oversubscription capacity* is amended to “firm entry or exit capacity that is provided in addition to the technical capacity in the framework of the oversubscription and buy-back scheme as referred to in Article 2.2.2 of Annex 1 to the Regulation;

#### **Article IV**

ACM is adopting this decision with due regard to the interests, rules, and requirements as referred to in Article 12f of the Dutch Gas Act.

This decision shall enter into force on **XX**.

This decision will be published, with explanatory information, in the Government Gazette.

The Hague, **[date of adoption of decision and explanatory information]**

The Netherlands Authority for Consumers and Markets,  
on its behalf:

Dr F. J. H. Don  
board member

## EXPLANATORY NOTES

In these explanatory notes, Part A contains an explanation on the amendment decision, and Part B explanatory information as referred to in Article 26 of NC-TAR.

### A. Explanation on the decision

#### A1. Summary

1. Through this code amendment decision, the Authority for Consumers and Markets (ACM) is implementing the European tariff structures network code for gas for GTS. The implementation of this network code has consequences for the tariff structures and for the transmission conditions. It also means that some limited amendments need to be made to the Gas Code of Definitions.
2. In this summary, ACM will briefly set out what NC-TAR essentially determines and explain the route from allowed revenues to entry and exit tariffs (tariff derivation). In Part III of this explanation, the decision will be described and explained in greater detail.
3. GTS sells transmission capacity per entry and exit point. A network user who contracts transmission capacity at an entry or exit point gains the right to feed a quantity of gas per hour to the network or to extract it from it. For this, GTS charges entry and exit tariffs. It derives the vast majority of its revenues from these entry and exit tariffs. GTS can also charge other tariffs to the extent that this does not involve the sale of (or a fee for) transmission capacity at entry and exit points.
4. The entry and exit capacity that GTS sells can vary with regard to:
  - *The entry or exit point location*: an exit point may, for example, be in the north of the country, or in the south of the country;
  - *The party connected to the entry or exit point*: different types of market participants may be connected to an entry or exit point;
  - *The duration of the period for which the network user has contracted capacity*: a network user may contract capacity for a month, for example, or a day;
  - *The time of year during which the network user has contracted capacity*: a network user may contract capacity for the month of December, for example, or the month of June, or for a day in January;
  - *The 'firmness' of the contracted capacity*: a network user may contract firm or interruptible capacity.
5. For each of the aforementioned aspects, the entry or exit tariff can vary. NC-TAR mainly sets rules in relation to these variations. NC-TAR also restricts the possibility of charging other tariffs and contains several general requirements in relation to these other tariffs.
6. One of the aims of NC-TAR is to harmonise tariff structures between European member states as a means of promoting market integration. To reach this aim, the network code states a number of requirements of the tariff structures that are applied in the member states. These requirements concern the way in which the tariffs charged by a transmission system operator are derived from the allowed revenues of the transmission system operator (the tariff derivation).

7. The tariff derivation that is based on NC-TAR must pass through a number of stages. These stages are:
- a. A decision on qualifying services as *transmission services and non-transmission services*. ACM has chosen to qualify all services as transmission services. The so-called allowed revenues, which are the starting point for the tariff derivation, are therefore related to revenues from transmission services. NC-TAR states that the costs of transmission services shall be covered by the entry and exit tariffs.
  - b. A decision relating to the reference price methodology. The allowed revenues for transmission services are then attributed to the entry and exit points. This is done using a *reference price methodology*. The application of the reference price methodology results in one *reference price* for each entry and exit point. Every tariff that applies to one entry or exit point is then derived from this reference price. The reference price methodology therefore determines whether, how much, and why the tariffs for entry and exit capacity vary from one entry and exit point to the next. ACM has opted for a so-called postage stamp method as a reference price methodology, with a 50/50 entry-exit split.
  - c. Decisions relating to adjustments to the reference prices. After applying the reference price methodology, it is still possible to adjust the reference prices in a number of cases. For example, NC-TAR prescribes a discount for the tariffs for gas storages and there is the option of giving a discount on the tariffs at entry points from LNG facilities. Other possible adjustments are (i) the rescaling of the reference prices for every point, (ii) equalising the tariffs of a subset of all the points, and (iii) the adjustment of the reference prices for specific points if the reference prices would otherwise be below the level of competitiveness (hereinafter: tariff benchmark). These *adjustments* result in the 'real' reference prices, which carry through in the remainder of the tariff calculation. ACM has opted to apply a discount for gas storage of 50% and also uses rescaling.
  - d. Decisions relating to the multipliers and seasonal factors. For firm yearly entry or exit capacity, the tariff is equal to the reference price (after adjustments). However, GTS also sells quarterly, monthly, daily, and within-day capacity products. Network users who contract these capacity products gain the right to transmit gas for a period of less than a year. ACM has to calculate the tariffs for quarterly, monthly, daily, and within-day capacity products by applying *multipliers* and *seasonal factors* to the reference price. A separate multiplier applies to each capacity product. In other words, there is a multiplier for quarterly capacity products, a multiplier for monthly capacity products, a multiplier for daily capacity products, and a multiplier for within-day capacity products. The multiplier determines the difference in price between a yearly capacity product and a quarterly, monthly, daily, or within-day capacity product. A multiplier for a monthly capacity product of 1.5 means that the price of a monthly capacity product is 50% higher than 1/12th of the price for a yearly capacity product. The *seasonal factors* determine the difference in price between the same capacity products at different times of the year. The application of seasonal factors results in capacity in the winter (peak period) being more expensive than capacity in the summer (non-peak period). ACM has chosen to apply seasonal factors and to set a multiplier of 1.25 for quarterly capacity products, a multiplier of 1.5 for monthly capacity products, and multipliers of 2.5 for daily and within-day capacity products.
  - e. A decision relating to the discount for interruptible capacity. Network users sometimes have the opportunity to contract interruptible entry and exit capacity. NC-TAR states

that there must be a *discount for interruptible capacity*, based on the probability of interruption and the 'economic value of the capacity'. ACM has chosen an ex-post discount for interruptible capacity.

- f. Finally, ACM has designated firm capacity with wheeling as a product with conditions, as referred to in Article 4, second paragraph, of NC-TAR. ACM has set a discount of 94% on the joint entry and exit tariff for the firm capacity product with wheeling.

## A2. Background and procedure followed

8. By establishing Regulation (EU) 2017/460 of 16 March 2017, the European Commission has adopted a network code on harmonised transmission tariff structures for gas (hereinafter: NC-TAR). The purpose of this network code, in accordance with Regulation (EC) 715/2009, is to harmonise transmission tariff structures for gas and to set-out the Union-wide rules, which have the objectives of contributing to market integration, enhancing security of supply and , and promoting the interconnection of gas networks, according to consideration (1) of NC-TAR.
9. Article 27, fourth paragraph, of NC-TAR states that the national regulatory authority (hereinafter: the NRA), in accordance with Article 41, sixth paragraph, part a of Directive 2009/73/EC, must adopt a reasoned decision regarding a number of specific points. Article 41, sixth paragraph, part a, of the Directive is implemented in Article 12f of the Dutch Gas Act and elsewhere. ACM is the national regulatory authority, as laid down in Article 1a, second paragraph, of the Dutch Gas Act. ACM is therefore authorised to implement NC-TAR by means of its authority to determine the tariff structures and conditions on the basis of Article 12f of the Dutch Gas Act. In concrete terms, this amounts to a decision by ACM to amend the Tariff Code Gas and the Transmission Code Gas TSO. A limited number of definitions in the Code of Definitions will also be amended. In this explanation, this is referred to as "amending the code decision" or "the code amendment decision", for the sake of brevity.
10. NC-TAR entails a detailed preparation procedure. Article 26 of NC-TAR states that one or more consultations must be carried out by the national regulatory authority or by the transmission system operator, depending on the decision of the NRA. ACM decided on 17 October 2017 that it will carry out the consultations referred to here and in Articles 27 and 28 of NC-TAR.<sup>1</sup>
11. Between 19 April 2017 and 19 December 2017, market participants were consulted about the implementation of NC-TAR and the relevant subjects and decisions to be made in this context. On 19 April, 17 May, 28 June, and 13 July 2017, the market was jointly consulted by ACM and GTS. In the autumn of 2017 (15 September, 28 September, and 13 October), GTS shared its ideas with the market and consulted with the market on them. To this end, GTS put down its ideas in writing and shared them with ACM and the market on 25 October.<sup>2</sup> From that moment onwards, ACM has shared its vision and proposed decision with the market. In this context, all market parties were consulted on 31 October, 27 November and 19 December 2017 on the relevant subjects that form part of the decision-making process and on the provisional vision

<sup>1</sup> <https://www.acm.nl/en/publications/decision-acm-division-tasks-arising-nc-tar>

<sup>2</sup> <https://www.gasunietransportservices.nl/uploads/fckconnector/d06fbd8d-439e-4e70-9e77-2719675e4427/3016146712/20171024%20GTS%20NC%20TAR%20Implementation%20proposal%20final.pdf?lang=nl>

of ACM in relation to these subjects. For the presentations by ACM and GTS<sup>3</sup>, please refer to <http://www.acm.nl/nctar>.

12. The aforementioned has resulted in the proposed draft decision on the basis of Article 12c, second paragraph, of the Dutch Gas Act. Pursuant to Article 12e, third paragraph, of the Dutch Gas Act, the joint network operators and the representative organisations may make their opinions of the draft decision known up to twelve weeks after the time at which the decision was sent to them.
13. ACM has decided to apply the uniform public preparation procedure as referred to in Section 3.4 of the General Administrative Law Act (hereinafter: Awb). ACM has, on the basis of Section 3:15, second paragraph of the Awb, provided other parties in addition to the interested parties the opportunity to state their view on the draft code amendment decision,
14. As part of the uniform public preparation procedure, ACM has made the draft decision and the documents pertaining to it available for perusal on its internet page. An announcement of the draft decision and said documents being made available for perusal was published in the Government Gazette dated 2 March 2018.
15. On 20 March 2018, ACM sent this English-language translation of the draft decision to the Agency, as referred to in Article 27 of NC-TAR.<sup>4</sup>
16. NC-TAR prescribes in Article 26 that, apart from rules (on the reference price methodology to be applied, for example), explanatory or indicative information must also be consulted on and set down in writing in the "consultation document" as referred to in Article 27 of NC-TAR. To the extent that it concerns information that does not contain any generally binding rules, ACM has included this information in the explanation or in the additional information, part B, with the draft of this decision.
17. ACM is of the opinion that the decision contains no technical provisions as referred to in the Notification Directive. Therefore, ACM has not notified the provisions in this draft decision.

### **A3. Decision**

18. Below, the outlines of the amendment decision are presented and explained.

#### *Introduction*

19. The purpose of this amendment decision is to implement NC-TAR. NC-TAR lays down rules and sets out requirements on how entry and exit tariffs are derived from the allowed revenues of a transmission system operator. The allowed revenues are the revenues that ACM establishes on the basis of the method decisions for the gas transmission system operator and the x-factor decisions based on that, and ultimately determines definitively in its yearly tariff decision.

---

<sup>3</sup> The presentations by GTS of 15 September, 28 September, and 13 October can be found on the GTS website.

<sup>4</sup> This is the Agency that was set up in accordance with Regulation 713/2009 of the European Parliament and the Council of 13 July 2009 for establishing an Agency for the cooperation of energy regulators.

20. NC-TAR includes an obligation to draw up a reference price methodology on the basis of which so-called reference prices can be established. The reference price methodology determines how the allowed revenues must be attributed to the entry and exit points. The application of the reference price methodology results in one reference price for each entry and exit point. All the tariffs that apply to one entry or exit point are derived from the reference price. The reference price methodology therefore determines whether, how much, and why the tariffs for entry and exit capacity vary from one entry and exit point to the next.
21. NC-TAR also includes a number of options (or obligations) for adjusting these reference prices. For example, by determining discounts and rescaling the reference price.
22. NC-TAR additionally states, for interconnection points, that the reserve prices must be determined by applying multipliers or seasonal factors to the reference price. The multiplier determines the difference in price between a contract with a duration of one year and a contract with a duration other than one year. The seasonal factors determine the difference in price between contracts of equal duration at different times of the year.

*Application of NC-TAR*

23. NC-TAR applies to every entry point and every exit point on gas transmission networks. An exception to this are Chapters III, V, VI, Article 28, Article 31, paragraphs 2 and 3, and Chapter IX, which, pursuant to Article 2 of NC-TAR, only apply to interconnection points. The excepted passages deal with provisions on multipliers, seasonal factors, interruptible capacity, interconnection points (virtual or otherwise), and incremental capacity. The provisions on interconnection points (virtual or otherwise) only apply, by definition, to interconnection points. The same applies to the provisions for incremental capacity, as this capacity can only be provided at interconnection points. For the other sections, decisions on their interpretation have to be taken at national level for domestic entry and exit points.
24. ACM has reasons for to apply the same decisions on the aspects of multipliers, seasonal factors, and interruptible capacity for domestic entry and exit points to be the same as those for interconnection points. According to ACM, there is no justification for distinguishing between domestic entry and exit points on the one hand, and the interconnection points on the other, on the basis of cost-reflectivity for the application of these aspects. The use of the network varies from one point to another, but from the subscription behaviour at each point, for example, it does not appear that the group of domestic entry and exit points use the network so differently from the group of interconnection points to the extent that a distinction would be justified. The decision by ACM on multipliers, seasonal factors, and interruptible capacity therefore makes no distinction between domestic entry and exit points and interconnection points.
25. In this context, it is also relevant that the Julianadorp interconnection point, the interconnection point that connects the GTS national gas transmission grid with the BBL interconnector, has recently been taken out of use. This amendment decision therefore disregards this former interconnection point. Given that no entry or exit capacity can be subscribed at this point, NC-TAR does not apply to this at all.

*From allowed revenues to transmission tariffs*

26. As mentioned above, NC-TAR contains requirements concerning the way in which the tariffs charged by a transmission system operator are derived from the allowed revenues of the

transmission system operator. The allowed revenues are definitively determined by ACM in the tariff decisions on the basis of method decisions and efficiency-stimulating tariff cut decisions, as referred to in Article 82 of the Dutch Gas Act. As the transmission system operator, GTS is currently subject to Method Decision GTS 2017-2022 and the efficiency-stimulating tariff cut decisions based thereon<sup>5</sup>.

27. In accordance with Method Decision GTS 2017-2021, the allowed revenues, as referred to in Article 3, under 11, of NC-TAR, are determined by adding all the total revenues, including those from tariff corrections for transmission tasks, balancing tasks, existing connection tasks, connection task, and the quality conversion task. The total revenues for each task, including revenues from tariff corrections, are calculated annually in accordance with Method Decision GTS 2017-2021 in the tariffs decisions by multiplying the total revenues for the task in the year ( $t-1$ ) by the efficiency-stimulating tariff cut and the CPI (the general consumer price index) and applying a few corrections (if applicable).<sup>6</sup> To the extent that ACM is able to foresee these corrections, it announces its proposed action in relation thereto in the method decision. However, the definitive decision on the application of corrections is part of the annual tariff decision.
28. The Wobbe Quality Adaptation (hereinafter: WQA) and peak supply tasks are not ex-ante tariff-regulated tasks, and the revenues related to these tasks are not part of the allowed revenues in this context.<sup>7</sup>
29. In accordance with the NC-TAR, ACM must distinguish between transmission services and non-transmission services. The costs of transmission services are covered, pursuant to Article 4, third paragraph, by capacity-based transmission tariffs. For non-transmission services, this has not been determined, which means other tariffs are possible here. NC-TAR also states that services that do not qualify as transmission services may be regarded as transmission services. This decision rests with the NRA.
30. ACM has decided that all GTS ex-ante tariff-regulated tasks (and services performed or activities carried out in that connection) qualify as transmission services or may be regarded as such. In Article 4, first paragraph, NC-TAR gives two criteria according to which services must be qualified as transmission services. The first criterion is that the costs of a service arise through the cost drivers of both technical or predicted contracted capacity and distance. The second criterion is that the costs of such service are related to the investment in and operation of the infrastructure which is part of the regulated asset base for the provision of transmission services. Every ex-ante regulated GTS service meets this second criterion. It is only for the transmission service, the balancing service, and the existing connection service that the costs arise through cost drivers of both technical or predicted contracted capacity, and distance (the first criterion). This means that these services are unequivocally transmission services as defined by Article 4, first paragraph, of NC-TAR. The other services - that is, the connection point service, the connection service, and the quality conversion service - do not

---

<sup>5</sup> Tariff decisions are taken every year.

<sup>6</sup> See Method Decision GTS 2017-2021, margin number 271.

<sup>7</sup> Peak supply concerns the task referred to in Article 10a, first paragraph, under a, of the Dutch Gas Act. WQA concerns the task referred to in Article 10a, first paragraph, under p, of the Dutch Gas Act. For the WQA task, the tariff structure in the Tariff Code is used. For the peak supply task, the tariffs are set in accordance with Article 2, fourth paragraph, of the Decision in Relation to Security of Supply Pursuant to the Dutch Gas Act.

have distance as a cost driver and therefore do not fully meet the criterion as referred to in Article 4, first paragraph, under a.

31. ACM has decided to use the option granted by NC-TAR to regard these services as transmission services as well. This is stated in Article 3.1.1 in conjunction with Article 3.1.2 of the Tariff Code. This means that all the allowed revenues of GTS that are generated by performing the aforementioned statutory tasks can be collected through capacity-based transmission tariffs (that is, entry and exit tariffs). In other words, the payment of an entry or exit tariff means that all costs, with the exception of those for WQA and peak supply, are covered, and that there are no separate tariffs for transmission capacity. This is in line with the objectives of NC-TAR. ACM also classifies quality conversion as transmission.
32. The same is true of the connection point and connection services. Although it may be true that only a certain group of end-users actually use these services, ACM nonetheless finds that its decision to classify them as transmission services is justified. This way, these services are regulated in the same way as the existing connection service, which must be qualified a transmission service. There is no good reason to regulate these services differently. This is because end-users have either an existing connection or a connection point or a grid connection. These services are therefore treated the same way as much as possible.
33. The aforementioned means that ACM sets entry and exit tariffs in accordance with the prescribed system for transmission services. Furthermore, ACM has seen no reason for part of the revenues from transmission services to be remunerated via commodity-based tariffs. All allowed revenues of GTS are therefore collected via capacity-based tariffs - the entry and exit tariffs<sup>8</sup>.
34. Since the entire amount of allowed revenue is collected by means of an entry or exit tariff, the basis for other separate tariffs is no longer applicable. This has led to a structural amendment to Chapter 3 of the Tariff Code Gas.
35. The Transmission Code Gas TSO has also been amended for the implementation of NC-TAR. This code effectively now distinguishes two services: the transmission service and the gas processing, treating, and mixing service, as referred to in Article 10a, first paragraph, under p of the Dutch Gas Act. The activities performed by GTS in connection with these two services are still mentioned and described in the Transmission Code Gas TSO. For the purpose of information, the following.
36. It is stated in Article 2.1.1 of the Transmission Code Gas TSO that the transmission service is granted on the basis of an agreement. Transmission is also defined: transmission entails the network operator of the national gas transmission grid taking gas at an entry point on the national gas transmission grid and making gas available at an exit point. Contracted entry capacity grants the right to feed a quantity of gas per hour into the national gas transmission grid at an entry point, and contracted exit capacity grants the right to extract a quantity of gas

---

<sup>8</sup> It should be mentioned that the revenues from these entry and exit tariffs are not the only revenues of GTS. Where applicable, GTS can also gain revenues from other payments or payment settlements as laid down by law, such as linepack flexibility service (Article 4.1.7 of the Transmission Code) or from auction premiums. Each of these revenues is settled with the allowed revenues, in the context of reconciliation.

per hour from the national gas transmission grid, states Article 2.1.2 of the Transmission Code Gas TSO.

37. In short, the transmission service is one where entry and exit capacity are contracted. Only an entry and exit tariff may be charged for this service. Custom-made agreements in which different tariffs are set are therefore no longer allowed. In this connection, Article 5.1.1 of the Transmission Code Gas TSO has been amended (final sentence has been deleted).
38. The individual “services” mentioned in the current Transmission Code Gas TSO, such as the interruptible service, the backhaul entry and exit capacity service, and the entry and exit capacity gas storage service also concern the contracting of entry and exit capacity. The Tariff Code is amended in the sense that the costs related to contracting entry and exit capacity are covered by the only tariff that may be charged, that is, the entry or exit tariff. In this connection, there is no longer any reason for the aforementioned “services” to be maintained as separate “services” in the Transmission Code Gas TSO. This has led to amendments to the Transmission Code Gas TSO: Article 2.1.2 (formulation), Article 2.1.2h (entry and exit capacity for gas storage is deleted), and Article 2.1.3 (backhaul entry and exit capacity is deleted).
39. The wheeling “service” is effectively contracted entry and exit capacity. However, in the case of wheeling, it is about a discount on the entry and exit tariff when the entry and exit points are situated at the same location. In the Transmission Code Gas TSO, wheeling capacity is regarded as a differentiation of the “normal” entry and exit capacity that can be contracted throughout the network - that is, regardless of location. For a description of wheeling capacity, see Article 2.1.2h of the Transmission Code Gas TSO. For the discount, see Article 3.2.3.9 of the Tariff Code Gas.
40. The current Transmission Code Gas TSO also refers to “services” like diversion, shifting, and transfer of transmission capacity, or the right of use. These “services” are in fact special conditions under which the transmission service is provided. Their costs will be remunerated in the only entry or exit tariff, on the basis of the amended Tariff Code Gas. These “services” will therefore no longer be identified as “services” in the Transmission Code Gas TSO. This has led to amendments to the formulation in Article 2.1.7 (diversion), Article 2.1.8 (shift of capacity), and Articles 2.1.10 to 2.1.14 (transfer of transmission capacity or the right of use).
41. An amendment to the description of shift of capacity has also been made. Because the costs of the shift of capacity are no longer covered by means of a custom-made tariff, the description has been narrowed by designating shifting as a right that may only be invoked if this is justified by exceptional and temporary circumstances of an operational nature. This narrowing of the description will prevent unbridled use being made of this right. GTS is evaluating this and will have to put a stop to it.
42. Another amendment to the Transmission Code Gas TSO is the cessation of the short-haul service. There is no interest in this service. GTS will no longer provide this service. A tariff structure for this service is therefore superfluous and the Tariff Code Gas consequently no longer includes any such tariff structure.

*Reference price methodology (hereinafter: RPM)*

43. The next question is how the capacity-based transmission tariffs can be derived from the revenues from transmission services. NC-TAR prescribes that, to begin with, this shall be done on the basis of a reference price methodology, the application of which leads to a reference price for every entry and exit point. NC-TAR stipulates that the same reference price methodology must be applied at every entry and exit point. ACM has opted for the so-called postage stamp method, in which distance plays no role.
44. The reference price is defined in Article 3 of NC-TAR as the price for a capacity product for firm capacity with a duration of one year, which applies to entry and exit points and which is used for establishing capacity-based transmission tariffs. The reference price is therefore the basis for the calculation of the entry and exit prices that are ultimately established.
45. Article 6 of NC-TAR stipulates that the RPM must be set or approved by the NRA. ACM establishes the RPM on the basis of Article 12f of the Dutch Gas Act.
46. Article 6 of NC-TAR also stipulates that the decision on which RPM is applied depends on the results of the periodic consultations held in accordance with Article 26. The above "Background and procedure followed" section sets out what consultations have taken place. The decision on an RPM has been examined in great detail in the context of these consultations. The consultations revealed that the transmission system operator has a preference for an RPM that is known as the postage stamp method. A number of market participants have a marked preference for the postage stamp method, while others have not given an opinion because of divisions among their members.
47. A postage stamp method means that every entry point gets the same tariff and every exit point gets the same tariff, regardless of their locations in the country. In concrete terms, distance is not used as a cost driver with the postage stamp method, so it is therefore not relevant. This means that capacity is the only cost driver that is used. This is in contrast with a capacity-weighted distance method (hereinafter: CWD method), which does weigh distance as a cost driver.
48. ACM has opted for the postage stamp method. In opting for the postage stamp method, ACM has involved the assessment framework of Article 7 of NC-TAR. This assessment framework reads:

*The reference price methodology shall comply with Article 13 of Regulation (EC) No 715/2009 and with the following requirements. The reference price methodology:*

- a) *enables network users to reproduce the calculation of reference prices and their accurate forecast;*
- b) *takes into account the actual costs incurred for the provision of transmission services considering the level of complexity of the transmission network;*
- c) *ensures non-discrimination and prevents undue cross-subsidisation including by taking into account the cost allocation assessments set out in Article 5;*
- d) *ensures that significant volume risk related particularly to transports across an entry-exit system is not assigned to final customers within that entry-exit system;*

e) *ensures that the resulting reference prices do not distort cross-border trade.*

49. This assessment framework states what the reference price methodology should “do” when it is applied - that is, to ensure that the reference price that applies to an entry or exit point reflects the relevant costs of the use of the network (hereinafter: cost-reflectivity). The mention in part b of “the actual costs incurred” and in part c of the cost allocation assessments, relating to the prevention of discrimination and undue cross-subsidisation, is a reference to this principle of cost-reflectivity. If tariffs are discriminatory and if undue cross-subsidisation occurs, then this affects cost-reflectivity. Differences in tariffs for end-users, without there being any objective justification for them, must be prevented. The requirement that cross-border trade may not be disrupted is also a reference to the cost-reflectivity requirement; in general, cost-reflective tariffs will not disrupt cross-border trade.
50. Another important requirement is stated in part a of Article 7 of NC-TAR, which states that the reference prices should be predictable and reproducible. The preamble to NC-TAR (in consideration (2)) explains this and states that network users should be allowed to 1. have clarity regarding the tariffs that have been set, 2. have clarity regarding the costs on which the transmission tariffs are based, and 3. be able to predict the transmission tariffs to a reasonable degree of accuracy.
51. All in all, ACM concludes that the requirements in Article 7 of NC-TAR, referred to under a to e, effectively equate to the requirement of cost-reflectivity and the requirement of predictability and reproducibility. ACM also sees confirmation of this in consideration (3) of NC-TAR, in which the purpose of the reference price methodology is described in, among other places, the first part of the sentence: “In order to achieve and ensure a reasonable level of cost-reflectivity and predictability in such a system, transmission tariffs need to be based on a reference price methodology using specific cost drivers”.
52. For the sake of completeness, ACM notes that Article 13 of Regulation 715/2009<sup>9</sup> (hereinafter: the Gas Regulation) stipulates requirements regarding the tariffs, while Article 7, parts a to e, of NC-TAR includes requirements regarding the reference price methodology and therefore the reference prices. The reference price methodology is an important stage in the calculation of the eventual entry and exit tariffs, but not the only one. See also the aforementioned stages for calculating entry and exit tariffs. ACM therefore interprets Article 7 of NC-TAR as follows - in deciding on an RPM, the requirements in Article 7 parts a to e have primary relevance. The result of applying these requirements should lead to reference prices that are not in breach of the requirements stated in Article 13 of the Gas Regulation regarding transmission tariffs or the method for calculating them.
53. In the opinion of ACM, a postage stamp method like RPM complies with the assessment framework of Article 7 of NC-TAR. It meets the cost-reflectivity requirement as well as the requirements relating to predictability and reproducibility. The parameters of the postage stamp method are dealt with below.

---

<sup>9</sup> In full: Regulation (EC) No. 715/2009 of the European Parliament and of the Council of 13 July 2009 on conditions for access to the natural gas transmission networks and repealing Regulation (EC) No. 1775/2005

54. The cost-reflectivity of the reference prices is, in the view of ACM, guaranteed if a reference price methodology has the following characteristics:
- All revenues from capacity-based transmission services are allocated to entry and exit points;
  - Revenues are allocated to each entry and exit point that correspond to a reasonable proportion of the costs for using the network via the entry or exit point in question;
  - The allocation of revenues for each entry or exit point is made according to the same allocation key methodology:
  - The parameters used with the allocation key methodology reflect the degree to which the network is used via the entry or exit point in question; and
  - The reference price is calculated by dividing the revenues allocated to every entry and exit point by a reliable prediction of the contracted entry or exit capacity for the entry or exit point in question.
55. The postage stamp method meets all these requirements. The parameter by which allocation keys are determined for allocating revenues is the predicted contracted capacity for each entry and exit point. The predicted contracted capacity reflects the degree to which the network is used via an entry or exit point and corresponds to the costs.<sup>10</sup> The postage stamp method therefore leads to cost-reflective reference prices.
56. A reference price methodology is predictable if it is public, if the input data are public, and if the network operators are able to make reasonable predictions about this input data. The postage stamp method has three parameters, each of which is public. This means that the postage stamp method is predictable and reproducible.
57. The assessment framework in Article 7 of NC-TAR also requires that account be taken of the cost allocation assessments set out in Article 5. The cost allocation assessments indicate the degree of cross-subsidisation between intra-system and cross-system network use on the basis of the proposed reference price methodology. If the degree of cross-subsidisation is greater than 10%, the NRA must provide a reasoned explanation. ACM carries out the cost allocation assessment twice. The first is before it carries out the adjustments in the fourth paragraph of Article 6, and then after it has applied these adjustments. This is because the application of the adjustments can affect the result of the cost allocation assessment. The result of the cost allocation assessment is 0.5% before adjustments. After applying the gas storage discount and rescaling, the result of the cost allocation test is 6.3%. Both results are less than 10%. This means there is no great degree of cross-subsidisation between intra-system and cross-system network use and demonstrates that the postage stamp method guarantees cost-reflectivity. The additional information in Part B of this explanation explains the components and details of these aspects.
58. Article 26, first paragraph, of NC-TAR requires that if the proposed reference price methodology differs from the reference price methodology set out in Article 8, a comparison must be made with this methodology as counterfactual. The reference price methodology set out in Article 8 is a capacity-weighted distance method). A postage stamp method involves capacity as a cost driver. A CWD method involves both capacity and distance as cost drivers. The difference between these two methodologies therefore results in a different division of

---

<sup>10</sup> The revenues allocated to each entry or exit point are then divided by the same contracted capacity for each entry or exit point, thereby resulting in the same reference price for entry points and exit points alike.

costs between the northern and southern Netherlands. Most entry points are located in the northern Netherlands, so in a distant-dependent model, these points would contribute to a lesser degree towards the costs of the gas transmission network.

59. In the light of the fact that the CWD method takes two cost drivers into consideration, using this methodology is, in principle, more in line with the principle of cost-reflectivity than with the postage stamp method. However, the CWD method has the significant disadvantage that many more input parameters have to be used, some of which are confidential. This lack of transparency makes the CWD method less predictable and reproducible. The cost allocation assessment of the CWD method leads to cross-subsidisation of 0.2% before adjustments, and to a degree of cross-subsidisation of 4.7% after the adjustments. The degree of cross-subsidisation when using a CWD method is therefore not significantly lower than in the case of the postage stamp method. The additional information in Part B of this explanation describes the indicative reference prices in the case of a postage stamp method and a CWD method, the average differences per segment, and the distribution with both methods.

*RPM parameters*

60. The relevant parameters for a postage stamp method in a situation with only allowed revenues that are collected through transmission services are the following:
1. Allowed revenues
  2. The entry-exit split thereof
  3. Predicted contracted capacity
- This is expressed in the formulas in Article 3.2.2.2 of the Tariff Code.
61. Re 1. The allowed revenues are based on the Method Decision of the transmission system operator and the related efficiency-stimulating tariff cut decisions and the annual decision on tariffs, as described in margin numbers 26 and 27.
62. Re 2. In relation to the entry-exit split, ACM has considered the following. The entry-exit split concerns the distribution of the allowed revenues for entry tariffs and exit tariffs. In other words, which part of the allowed revenues is collected through entry tariffs and which part through exit tariffs. The circumstance in an entry-exit system whereby entry and exit capacity are contracted independently of each other, and therefore that it is not a given that the amount of entry capacity is or will be equal to the amount of exit capacity, makes it necessary to take a decision about this entry-exit split. This also applies to every reference price methodology.
63. GTS incurs costs in order to be able to provide entry capacity at entry points and in order to provide exit capacity at exit points. This means that a distribution of 0/100 (0 entry and 100 exit) is not the right one. That, after all, would mean that no costs at all would be allocated to the provision of entry capacity, while all the costs would be allocated to the provision of exit capacity. This is very much at odds with the requirement of cost-reflectivity. The reverse distribution, 100/0, is equally inappropriate - there is not a single reason for all the covering costs to be obtained through an entry tariff while allocating no costs to exit capacity.
64. ACM has decided to set the entry-exit split at 50/50. This means ACM has opted for an equal and balanced distribution. This is based on the assumption that the costs incurred by GTS in order to be able to provide entry capacity at entry points are more or less equal to the costs GTS incurs in order to provide exit capacity at exit points. Viewed from the perspective of cost-reflectivity, a 50/ 50 split is an obvious choice. This distribution is also in line with the

capacity-weighted distance reference price methodology , the counterfactual as referred to in Article 8 of NC-TAR, in which the 50/ 50 split is obligatory. The chosen entry-exit split of 50/50 resembles the current split, which is around 40/60.

65. The option for a 50/ 50 split was discussed extensively during the consultation meetings in the autumn of 2017. The opinions of the market participants appear to be divided. GTS proposed a 0/ 100 split. In short, its proposal was based on the aim of boosting cross-border gas flows, to maintain the current volume of gas flowing through the Dutch national gas transmission grid as much as possible. By setting the entry tariff at 0, the transmission tariff for entry and exit capacity combined is lower than with an entry tariff greater than 0.<sup>11</sup> This will persuade transit parties to opt for the Dutch entry-exit system, rather than, for example, the German system believes GTS. A number of market participants support GTS in its vision, but a number of market participants certainly do not. VEMW, which represents business end-users, for example, sees no merit in a 0/ 100 split, because it regards this cost distribution as imbalanced and discriminatory.
66. ACM does not see reason in the comments by the - divided - parties to persuade it to opt for a different distribution. Firstly, GTS has not demonstrated that a 0/ 100 split would have the effect hoped for by GTS on the gas flows through the Dutch transmission network. That is because this effect depends on the transmission tariffs in other countries and, additionally, the transmission tariffs are not the only factor that network users consider when transmitting gas via particular routes. Other factors include the gas price and the availability of transmission capacity on other routes. There is no relevant information available about this. In that connection, ACM points out that Article 6, fourth paragraph, under a of NC-TAR explicitly offers the option of lowering reference prices if there is a reason to do so - that is, by benchmarking tariffs. This is therefore the ideal means for tackling and adjusting the alleged evil of the high and uncompetitive Dutch tariffs. At present, ACM does not see any reason to initiate a tariff benchmark.
67. Moreover, there are a number of potentially detrimental effects of a 0/ 100 split. There is the risk, for example, of misleading (inefficient) investment incentives. Also, there is the problem that would arise because of the loss of the Julianadorp interconnection point in combination with a 0/ 100 split. This would lead to the situation that, with a 0/ 100 split, the gas would be fed into the Dutch gas transmission network for a 0 tariff and would be able to leave the Dutch gas transmission network via the BBL to the UK, also for a 0 tariff. That is because the shippers would only have to pay an exit tariff to the BBL. This would lead to cross-subsidisation between transit parties that transmit gas from outside the Netherlands to the United Kingdom and the other shippers who use the GTS gas transmission network. This is recognised by GTS, and the solutions it has presented to counter this detrimental effect are not adequate.
68. Finally, ACM notes that the aim put forward by GTS of attracting gas flows to the Netherlands cannot be regarded as being in the general public interest, the serving of which is behind the establishment of NC-TAR and the Gas Regulation. On the contrary, in fact: attracting gas flows using instruments not designed for that purpose at the expense of the volume of other European transmission systems would appear to be in conflict with the notion of the European market and harmonisation, as well as with the requirement that tariffs should promote *efficient*

---

<sup>11</sup> This is because more exit capacity than entry capacity is usually subscribed to.

trade, and with the prohibition on disrupting cross-border trade. In implementing NC-TAR, ACM can therefore not consider this as being in the general public interest.

69. All in all, ACM sees no reason to decide for a split other than 50/50.
70. Re 3. ACM bases its predicted contracted capacity on an estimate by GTS. GTS includes these estimates in its tariff proposal and ACM assesses them in its tariffs decision. The estimation by GTS is arrived at in three stages. First, GTS determines what capacity products it has already sold for each segment for the tariff year in question. GTS then estimates, for each market segment, what average transmission capacity it expects to sell in addition to the already sold capacity. For this, it uses market information and regulations through its contacts with relevant market participants, and analyses of historic subscription behaviour for different capacity products. Incidental daily subscriptions are disregarded for this purpose. Finally, GTS translates the expected sales of different capacity products into the predicted contracted capacity (one figure). As it does so, it considers various products on the basis of revenues generated by each product. In other words, it takes account of the multipliers and seasonal factors for the various capacity products. The way in which GTS estimates additional capacity for each segment is contained in the additional information with this decision.

*Adjustments to the reference price*

71. NC-TAR provides options for adjusting the reference price. These options are, pursuant to Article 6, fourth paragraph, of NC-TAR restricted to 1) discounts as referred to in Article 9, or 2) adjustments as a result of one or more of the circumstances mentioned in the fourth paragraph, under a to c.
72. On the basis of Article 9 of NC-TAR, ACM has set a discount of 50% on the entry and exit tariff of entry points from and exit points to gas storage facilities. This meets the requirement set out in the first paragraph of Article 9 that a percentage of at least 50% shall be applied in order to avoid double charging for transmission to and from storage facilities, as apparent from consideration 4 of the preamble of NC-TAR. In the opinion of ACM, there is no reason to decide on a higher discount, because of system flexibility and the security of supply. In addition, there is currently a 25% discount in place, so it would mean a substantial increase to the discount.
73. In the event that a gas storage facility is connected to more than one transmission or distribution networks and competes with an interconnection point, the first paragraph of Article 9 of NC-TAR provides for the option of setting a discount of less than 50% for the gas storage facility in question. ACM has not identified any competition between the gas storage facilities and interconnection points, and therefore sees no reason to use the available option. ACM therefore applies the discount of 50% to every gas storage facility entry and exit point.
74. ACM has set no discount percentage for LNG facility entry points. This discount can be applied in order to increase the security of supply. ACM currently sees insufficient reason to apply a discount in order to increase the security of supplies.
75. ACM has not exercised the option of adjusting the reference prices as a result of one or more of the circumstances mentioned in Article 6, fourth paragraph, under a and b, either because they are not applicable or there is no reason to do so. However, ACM is exercising the option of rescaling, as referred to in Article 6, fourth paragraph, under c. ACM rescales the tariffs

after applying the discount for gas storage. To this end, the reference prices for every entry and exit point are adjusted by multiplying each tariff by a constant.

*Multipliers and seasonal factors*

76. The adjusted reference price serves as a basis for calculating the so-called reserve price (so only for interconnection points); Article 12 of NC-TAR stipulates that for standard yearly capacity products for firm capacity, the reference prices are used as reserve prices. Article 12 is a provision from Chapter III which, in accordance with Article 2 of NC-TAR, applies solely to interconnection points. ACM has decided to apply the provisions in Chapter III also to domestic entry and exit points. This means the calculation method for the payable price for domestic entry and exit points is the same as the calculation method for the reserve price for interconnection points.
77. In addition to yearly capacity products, GTS sells quarterly, monthly, daily, and within-day capacity products. NC-TAR stipulates that the reserve prices for non-yearly capacity products must be calculated as laid down in Chapter III. This means that so-called multipliers must be applied. ACM is therefore obliged by NC-TAR to lower the price of quarterly and monthly capacity products relative to yearly capacity products in comparison with the current prices. The minimum and maximum level is stipulated in Article 13 of NC-TAR.
78. NC-TAR provides the possibility to apply seasonal factors, in addition to multipliers, to the reference price. Article 15 of NC-TAR prescribes how the seasonal factors for standard quarterly capacity products, standard monthly capacity products, standard daily capacity products, and standard within-day capacity products are to be calculated.
79. Article 13 of NC-TAR gives a bandwidth, for the level of multipliers for each capacity product, that is, a minimum and maximum - within which the level of the multiplier must be set. Article 15 states how the seasonal factors must be set
80. Also, the NRA must, in accordance with Article 28, third paragraph, when determining the multipliers and seasonal factors, take account of the following requirements:
  - a) *for multipliers:*
    - i) *the balance between facilitating short-term gas trade and providing long-term signals for efficient investment in the transmission system;*
    - ii) *the impact on the transmission services revenue and its recovery;*
    - iii) *the need to avoid cross-subsidisation between network users and to enhance cost-reflectivity of reserve prices;*
    - iv) *situations of physical and contractual congestion;*
    - v) *the impact on cross-border flows;*
  - b) *for seasonal factors:*
    - i) *the impact on facilitating the economic and efficient utilisation of the infrastructure;*
    - ii) *the need to improve the cost-reflectivity of reserve prices.*

81. In the opinion of ACM, the requirements for the multipliers do not point to a particular direction that would suggest there is only one correct choice. Some requirements point towards a high or higher multiplier, and others towards a low or lower one.
82. In line with these requirements, ACM, when setting the multipliers, applies the principle that the difference in the level of the various multipliers should reflect the idea that the choice of a within-day, daily, monthly, or quarterly capacity product should require consideration of the costs of a particular capacity product compared to the profit from it for the end-user, including when set against the price of a yearly capacity product.
83. ACM also finds that a multiplier of 1 is not reasonable, as this causes a great degree of cross-subsidisation and detracts from cost-reflectivity. After all, the costs of transmission capacity are caused primarily by the peak supply to transmission capacity. To meet peak demand, GTS must install a large network. A large network means not just that peak demand can be met, but also that more transmission capacity is available in the rest of the year. The costs of providing short-term transmission capacity do not therefore essentially differ from the costs of providing transmission capacity for a year.
84. ACM also thinks that the multiplier used should increase as the period of the capacity product decreases. This is because there has to be a proper balance between the capacity tariffs for capacity products of different contractual durations, in order to justify the existence of every capacity product. After all, if the multiplier for a quarterly capacity product were to be higher or equal to the multiplier for a monthly capacity product, a quarterly capacity product would have no added value. In such circumstances, a network user would be just as well off (or even better off) by purchasing three monthly capacity products. In concrete terms, the principle used by ACM is that the quarterly multiplier is lower than the monthly multiplier, which in turn is lower than the daily multiplier. The within-day multiplier is the same as the daily multiplier.
85. All of which results in the following multipliers. For quarterly capacity products, ACM has set the multiplier at 1.25. For monthly capacity products, ACM has set the maximum multiplier, 1.5. For daily and within-day capacity products, ACM has set a multiplier of 2.5. In the opinion of ACM, this means the relative values of the multipliers are as they should be, and that they provide a good incentive for considered choices for capacity products for a certain period of time.
86. In addition to the multipliers, ACM has also decided to apply seasonal factors. The reason for this is that the gas transmission network is used much more in the winter months, and that the gas transmission network has been constructed for this peak supply. The application of seasonal factors therefore improves the cost-reflectivity of the transmission tariffs. Also, applying seasonal factors can have the effect of transferring, to some degree, demand from the "high season" to the "low season", which in turn can lead to the infrastructure being used more efficiently.
87. Article 15 of NC-TAR prescribes the method for calculating the seasonal factors. ACM calculates the seasonal factors for all points together. This means that the seasonal factors are the same for every entry and exit point.
88. ACM sets the seasonal factors in such a way that they lead to maximum seasonal dependency of the prices. This is done by squaring the values referred to in Article 15, third

paragraph, under d, and by raising the value referred to in the third paragraph, under e, of Article 15, by the power of 2. In the process, ACM sets the predicted flows as referred to in the third paragraph, under a, of Article 15 by taking the average of the monthly allocations for the years between 2007 and 2016. The seasonal factors for quarterly capacity products are derived (this is compulsory) from the monthly capacity products: to this end ACM uses the arithmetic mean of the seasonal factors of the months in question. The seasonal factors are rounded off to three decimal places. ACM applies the seasonal factors to all entry and exit points.

89. As already indicated above and in margin number 24 of this explanation, ACM believes there is justification for applying the same multipliers and seasonal factors at interconnection points and domestic entry and exit points. At interconnection points, the multipliers and seasonal factors are applied to determine the reserve price for the different standard capacity products identified in NC-CAM. ACM operates the same system at domestic entry and exit points.
90. ACM therefore introduces the term 'capacity product' in Article 2.1.2 of the Transmission Code Gas TSO at domestic entry and exit points. A capacity product shows the start date, the start time, and the duration of the contracted capacity. The same capacity products are distinguished at domestic entry and exit points as at interconnection points, with the exception of yearly capacity products, which can (only) start on the first day of any month at domestic entry and exit points.
91. The capacity products at domestic entry and exit points are not auctioned, but allocated on a first-come-first-served basis. The application of the multipliers and seasonal factors to the reference price does not therefore lead to a reserve price but to the price payable. Article 3.2.3.2 of the Tariff Code Gas therefore stipulates that the payable price for capacity products at domestic entry and exit points are calculated in the same way as the reserve price for capacity products at interconnection points. There is one supplement to this, described in Article 3.2.3.8 of the Tariff Code Gas. This supplement stipulates that if a network user at a domestic entry or exit point purchases on one day a combination of yearly, quarterly, monthly, daily, and within-day capacity products that meant he would have been better off by purchasing a product for a longer period of time, the payable price will be set at the maximum payable price, at the request of the network user, for the capacity product with a longer period of time.
92. Finally, ACM is amending Article 2.1.2b of the Transmission Code Gas TSO, because of the multipliers and seasonal factors. The reason for this is as follows. At exit points that form the connection between the national gas transmission grid and a regional gas transmission grid, the exit capacity is allocated in a different way to a recognised programme-responsible party. The network operator of the national gas transmission grid determines the total amount of exit capacity that is needed for profile end-users and telemetry industrial users respectively for these exit points (hereinafter: standard capacity of profile end-users and planning capacity of telemetry industrial users). The standard capacity of profile end-users per month is then distributed among recognised programme-responsible parties and network areas in accordance with the provisions of Article 2.1.2d of the Transmission Code Gas TSO. Similarly, the planning capacity of telemetry industrial users per month is then distributed among recognised programme-responsible parties and network areas in accordance with the provisions of Article 2.1.2e of the Transmission Code Gas TSO. The recognised programme-responsible parties cannot therefore choose between different capacity products when

contracting extra capacity at these exit points. This decision is made by the network operator of the national gas transmission grid. The proposed multipliers and seasonal factors result in more price differences between the various capacity products. Article 2.1.2b therefore states that the total amount of exit capacity that is needed is contracted in the least expensive (for recognised programme-responsible parties) combination of yearly, quarterly, and monthly capacity products.

93. The total contracted exit capacity per month is then distributed among recognised programme-responsible parties and network areas in accordance with the provisions of Articles 2.1.2d and 2.1.2e of the Transmission Code Gas TSO. Article 2.1.2b of the Transmission Code Gas TSO also stipulates that the allocated capacity be allocated pro rata. This means that, for example, if the total contracted exit capacity for profile users in the month of December consists of 40% of a contracted yearly capacity product, 40% of a contracted quarterly capacity product, and 20% of a contracted monthly capacity product, the capacity will be distributed among programme-responsible parties in the same proportion of capacity products. This means that the contracted exit capacity for each recognised programme-responsible party per network area per month can consist of a combination of yearly, quarterly, and monthly capacity products. Finally, Article 3.2.3.9 of the Tariff Code Gas states that the price payable for contracted monthly capacity products is equal to the price payable for the monthly capacity product, while the price payable for contracted quarterly and yearly capacity products is corrected for the period involved.

*Adjustments to the reserve prices*

94. Pursuant to Article 16 of NC-TAR, the reserve price for standard capacity products for interruptible capacity may be adjusted by means of an ex ante discount or an ex post discount. ACM has decided to apply the ex post discount, as referred to in the fourth paragraph of Article 16 of NC-TAR, where the network user is compensated retrospectively if an actual interruption has occurred. In taking this decision, ACM has taken into consideration the fact that there have been no interruptions to capacity in recent years and that applying an ex ante discount would not sufficiently acknowledge this fact.
95. Finally, when setting tariffs ACM can, in accordance with Article 4, second paragraph of NC-TAR, take into account the conditions for firm capacity products. There is one firm capacity product with conditions, namely firm capacity with wheeling. ACM has set a discount of 94% on the joint entry and exit tariff for the firm capacity product with wheeling. ACM has determined this discount percentage on the basis of tariffs for wheeling for 2018. The difference between the tariff for wheeling and the combined entry and exit tariff at the virtual interconnection points<sup>12</sup> is 94%.

---

<sup>12</sup> For the purpose of this decision, the 2018 tariffs have been calculated as if virtual interconnection points were going to be introduced in 2018. The discount has been calculated on the basis of these tariffs.

**B. Additional explanatory information on Article 26 of NC-TAR (periodic consultation)**

**B.1: Numerical details of comparison of postage stamp method with CWD method**

96. Below, the distribution of tariffs in the postage stamp method and the CWD method is shown. This distribution is based on the reference prices after the adjustments contained in article 6, paragraph 4, of NC-TAR, as if the proposed method was already applicable in 2018. The only exception is the fact that ACM has calculated the reference prices as if virtual interconnection points were already implemented.
97. The distribution in the postage stamp method is caused by the discount for the gas storage points. The distribution in the CWD method is caused by the inclusion of distance as a cost driver and by the discount for the gas storage points. Because distance is included as a cost driver, the reference prices depend on the location of the entry or exit point.

*Minimum, maximum and weighted average reference price (after adjustments) on the basis of the postage stamp method*

	<i>Entry</i>	<i>Exit</i>	<i>Unit</i>
Minimum reference price	0.915	0.820	EUR/kWh/hour/year
Maximum reference price	1.830	1.641	EUR/kWh/hour/year
Weighted average price	1.329	1.528	EUR/kWh/hour/year

*Minimum, maximum and weighted average reference price (after adjustments) on the basis of the CWD- method*

	<i>Entry</i>	<i>Exit</i>	<i>Unit</i>
Minimum price	0.805	0.355	EUR/kWh/hour/year
Maximum price	2.309	2.787	EUR/kWh/hour/year
Weighted average price	1.373	1.544	EUR/kWh/hour/year

*Percentage differences between the minimum, maximum and weighted average reference price (after adjustments) on the basis of the postage stamp method and on the basis of the CWD-method*

	<i>Entry</i>	<i>Exit</i>	<i>Unit</i>
Minimum price	13.7	131.1	%
Maximum price	-20.7	-41.1	%
Weighted average price	1.3	-1.1	%

98. The tables below show the differences for each segment between the weighted average of the reference prices of the postage stamp method and the CWD-method. These differences are calculated on the basis of the classification of segments as shown in the 2018 tariff decision. The differences are caused by the aforementioned location dependency of the CWD-method .

*Percentage difference between the weighted average reference price (after adjustments) for each segment for the postage stamp method as compared to the CWD-method*

	<i>Segment</i>	<i>Difference</i>	<i>Unit</i>
Entry	Border points <sup>13</sup>	-5.4	%
	Production	4.7	%
	Gas storage facilities	4	%
Exit	Border points <sup>13</sup>	-12.0	%
	Industry	-0.3	%
	Distribution	5.5	%
	Gas storage facilities	70.1	%

99. Lastly, ACM shows the differences between the weighted average reference price on the basis of a postage stamp method and on the basis of the CWD-method for each border. Border points that do not classify as an interconnection point are not taken into account here.

*Percentage differences for border points between the weighted average reference price between the postage stamp method and the CWD-method*

	<i>Segment</i>	<i>Value</i>	<i>Unit</i>
Entry	Interconnection points with Germany	-1	%
	Interconnection points with Belgium	-8	%
	Interconnection points with Norway	-9	%
Exit	Interconnection points with Germany	3	%
	Interconnection points with Belgium	-27	%

<sup>13</sup> The segment border points also includes some entry and exit points that do not classify as a (virtual) interconnection point.

**B.2: Value of the RPM parameters**

<i>Parameter</i>	<i>Value</i>	<i>Unit</i>
Allowed revenues	886,003,683	EUR, pI 2018
Forecasted contracted capacity on entry points	286,225,367	kWh/hour/year
Forecasted contracted capacity on exit points	319,228,942	kWh/hour/year
Percentage of the allowed revenues that must be collected via the entry tariffs	50	%
Percentage of the allowed revenues that must be collected via the exit tariffs	50	%

*Description of the parameters of the RPM*

100. The description of the RPM parameters is included in margin numbers 60 - 70 (Section A3).

**B.3: Cost allocation assessments**

101. The cost allocation assessment, as described in article 5 of NC-TAR, analyses the degree of cross-subsidisation between intra-system network use and cross-system network use. The application of the cost allocation assessment leads to an index that expresses the degree of cross-subsidisation. If this index is higher than 10%, ACM has to justify the result. As mentioned in margin number 57, the cost allocation assessment leads to a lower index. Below, ACM describes how the cost allocation assessment was executed.

102. The cost allocation assessment works as follows. For both intra-system network use and cross-system network use the income collected from the network use in question should be divided by the cost drivers of that specific network use. This results in a ratio for intra-system network use and a ratio for cross-system network use. Subsequently, the index is calculated by multiplying the absolute difference by two and dividing that result by the sum of the ratios.

103. To execute this calculation it is necessary to determine the value of the following parameters.

- a. Income from intra-system network use;
- b. Income from cross-system network use;
- c. The cost drivers allocated to intra-system network use;
- d. The cost drivers allocated to cross-system network use.

104. NC-TAR gives the following definitions of intra-system network use and cross-system network use:

- a. Intra-system network use is defined as: “transporting gas within an entry-exit system to customers connected to that same entry-exit system”; and
- b. Cross-system network use is defined as: “transporting gas within an entry-exit system to customers connected to another entry-exit system”.

105. ACM concludes from these definitions that exit points can be classified as either cross-system network use (all border points) or as intra-system network use (all other exit points). The revenues that are expected to be collected from these points can be calculated by multiplying the applicable reference price by the forecasted contracted capacity of that exit point. The cost drivers allocated to these exit point can also be clearly determined. The proposed reference

price methodology uses forecasted contracted capacity as cost driver. For this reason ACM allocates the forecasted contracted capacity on exit points on the border to cross-system network use and the forecasted contracted capacity on all other exit points to intra-system network use.

106. Entry points cannot be so easily classified as either cross-system network use or intra-system network use. Gas that is fed into the network on a border point (cross-system network use) can be extracted at a national exit point (intra-system network use). Article 5, paragraph 5, of NC-TAR therefore determines how ACM should divide the income and the cost drivers for entry points. The forecasted contracted entry capacity that is allocated to cross-system network use should be equal to the forecasted contracted exit capacity allocated to cross-system network use. So for cross-system network use, the rationale “in=out” is used. The remaining forecasted contracted entry capacity has to be allocated to intra-system network use.
107. After ACM allocates the forecasted contracted capacity to either intra-system network use or cross-system network use, it can easily determine the cost drivers, since the cost drivers are equal to the forecasted contracted capacity. Finally, the income for entry points is allocated to cross-system network use or intra-system network use on the basis of the same ratio as the forecasted contracted capacity.
108. Based on the aforementioned method ACM determined the parameters and executed the cost allocation assessment. As mentioned before ACM executed the cost allocation assessment twice. Therefore, below ACM presents the details of the assessment twice.

*Cost allocation assessment based on reference prices before adjustments*

*Allocation key for dividing revenues of entry points to intra-system network use and cross-system network use*

Share of revenues of intra-system network use	54.8%
Share of revenues of cross-system network use	45.2%

*Allocation of cost drivers and revenues to either intra-system or cross-system network use*

		<i>Cost driver: forecasted contracted capacity in kWh/hour/year</i>	<i>Revenues in EUR, p1 2018</i>
Entry	Intra-system	156,737,881	242,589,155
	Cross-system	129,487,486	200,412,686
Exit	Intra-system	189,741,456	263,308,877
	Cross-system	129,487,486	179,692,964

*Ratios*

Ratio intra-system network use	1.460
Ratio cross-system network use	1.468

109. Applying the formula from Article 5, third paragraph, under c, of NC-TAR results in an index of 0.5%.

*Cost allocation assessment based on reference prices after adjustments*

*Allocation key for dividing revenues of entry points to intra-system network use and cross-system network use*

Share of revenues of intra-system network use	0.548
Share of revenues of cross-system network use	0.452

*Allocation of cost drivers and income to either intra-system or cross-system network use*

		<i>Cost driver: forecasted contracted capacity in kWh/hour/year</i>	<i>Revenues in EUR, pl 2018</i>
Entry	Intra-system network use	156,737,881	218,110,170
	Cross-system network use	129,487,486	180,189,610
Exit	Intra-system network use	189,741,456	275,246,718
	Cross-system network use	129,487,486	212,457,184

*Ratios*

Ratio intra-system network use	1.424
Ratio cross-system network use	1.516

110. Applying the formula from Article 5, third paragraph, under c, of NC-TAR results in an index of 6.3%.

**B.4: Information from Article 30(1)(b)(i), (iv), (v) of NC-TAR**

*30(1)(b)(i) – Allowed revenues*

Allowed revenues 2018	886,003,683	EUR, pl 2018
-----------------------	-------------	--------------

*30(1)(b)(iv) – Allowed revenues from transmission services*

Allowed revenues from transmissions services	886,003,683	EUR, pl 2018
--	-------------	--------------

*30(1)(b)(v)(1) – Capacity-commodity split*

Revenues from capacity-based transmission tariffs	100	%
Revenues from commodity-based transmission tariffs	0	%

*30(1)(b)(v)(2) – Entry-exit split before adjustments*

Revenues from capacity-based transmission tariffs at every entry point	50.0	%
Revenues from capacity-based transmission tariffs at every exit point	50.0	%

*30(1)(b)(v)(2) – Entry-exit split after adjustments*

Revenues from capacity-based transmission tariffs at every entry point	45.0	%
Revenues from capacity-based transmission tariffs at every exit point	55.0	%

*30(1)(b)(v)(3) – Intra-system/cross-system split before adjustments*

Revenues from intra-system network use	57.1	%
Revenues from cross-system network use	42.1	%

*30(1)(b)(v)(3) – Intra-system/cross-system split after adjustments*

Revenues from intra-system network use	55.7	%
Revenues from cross-system network use	44.3	%

**B.5: Simplified tariff model**

111. ACM has published on its website ([www.acm.nl](http://www.acm.nl)) the “Annex B.5: Tariff model” Excel file, including an explanation about the use of the document, in order to allow network users to calculate the applicable tariffs for the tariff period and predict the possible development after that tariff period.

**B.6: Calculation of seasonal factors**

112. ACM has published on its website ([www.acm.nl](http://www.acm.nl)) the “Annex B.6: Calculation of Seasonal Factors” Excel file, with the calculation of the seasonal factors.

**B7. Indicative reference prices entry points**

Entry point		Indicative reference price EUR/kWh/h/y		Difference %
ID	Description	Postage stamp	CWD	
VIP_EN1	VIP-L-NCG	1,830	1,176	56%
VIP_EN2	VIP-L-GPL	1,830	1,830	0%
VIP_EN3	VIP-H-NCG	1,830	1,830	0%
VIP_EN4	VIP-H-GPL	1,830	1,877	-3%
301068	KOEDIJK (TAQA)	1,830	1,658	10%
301069	ANJUM (NAM)	1,830	2,018	-9%
301070	ANNERVEEN (NAM)	1,830	1,712	7%
301071	BALGZAND (NAM-HC)	1,830	1,876	-2%
301072	BALGZAND (NAM-LC)	1,830	1,992	-8%
301073	BALGZAND (NAM-NOGAT)	1,830	1,876	-2%
301074	BARENDRECHT (NAM)	1,830	1,467	25%
301075	BEDUM (NAM)	1,830	1,979	-8%
301076	BLIJA (NAM)	1,830	2,098	-13%
301078	BOTLEK (NAM)	1,830	1,489	23%
301080	EMMEN GZI (NAM)	1,830	1,803	2%
301082	BOTLEK (ESSO FLEXICOKER)	1,830	1,489	23%
301083	GAAG (NAM)	1,830	1,592	15%
301084	GARIJP (VERMILION ENERGY)	1,830	1,838	0%
301085	GROOTEGAST (NAM)	1,830	1,889	-3%
301086	GRIJPSKERK (NAM)	1,830	1,856	-1%
301088	HARLINGEN (VERMILION ENERGY)	1,830	2,309	-21%
301089	KOOTSTERTILLE (NAM)	1,830	1,863	-2%
301090	MAASVLAKTE (TAQA)	1,830	1,575	16%
301092	MIDDENMEER (VERMILION ENERGY)	1,830	1,762	4%
301093	MONSTER (NAM)	1,830	1,772	3%
301094	UITHUIZEN (NGT)	1,830	2,133	-14%
301096	OUDE PEKELA (NAM)	1,830	1,834	0%
301097	ROTTERDAM WESTGAS (NAM)	1,830	1,489	23%
301098	GRONINGEN (NAM)	1,830	1,735	5%
301101	TEN ARLO (NAM)	1,830	1,441	27%
301106	URETERP (NAM)	1,830	2,051	-11%
301107	VRIES (NAM)	1,830	1,600	14%
301108	WAALWIJK (VERMILION)	1,830	1,465	25%
301109	WARFFUM (NAM)	1,830	2,156	-15%
VIP_EN5	VIP-H-ZTP	1,830	1,981	-8%
301113	EMDEN EPT (GASSCO)	1,830	2,002	-9%
301114	GRIJPSKERK (NAM - UGS)	0,915	0,929	-1%
301116	NORG (NAM - UGS)	0,915	0,915	0%
301118	ALKMAAR (TAQA - PGI)	0,915	0,811	13%
301185	OUDE STATENZIJL RENATO (OGE)	0,915	0,939	-3%
301198	ENSCHEDI (INNOGY-UGS EPE)	0,915	0,826	11%
301309	ENSCHEDI (NUON-UGS EPE)	0,915	0,826	11%
301311	MIDDELIE (NAM)	1,830	1,616	13%
301320	ZUIDWENDING (UGS)	0,915	0,874	5%
301345	ROTTERDAM (GATE)	1,830	1,587	15%
301348	BERGERMEER (TAQA-UGS)	0,915	0,805	14%

---

301360	OUDE STATENZIJJ (ETZEL-EKB-H)	0,915	0,939	-3%
301361	OUDE STATENZIJJ (EWE-H)	0,915	0,939	-3%
301375	BRAKEL WIJK&AALBURG (VERMILION)	1,830	1,347	36%
301391	OUDE STATENZIJJ (ASTORA JEMGUM)	0,915	0,939	-3%
301392	ZWOLLE (NATUURGAS OVERIJSSEL B.V.)	1,830	1,384	32%
301397	ENSCHEDA (ENECO-UGS EPE)	0,915	0,815	12%
301400	OUDE STATENZIJJ (ETZEL-CRYSTAL-H)	0,915	0,939	-3%
301401	OUDE STATENZIJJ (ETZEL-FREYA-H)	0,915	0,939	-3%
301452	IJMUIDEN (WINTERSHALL)	1,830	1,616	13%
301453	OUDE STATENZIJJ (EWE JEMGUM)	0,915	0,939	-3%
301454	MAASVLAKTE Q16 ORANJE NASSAU (ONE)	1,830	1,575	16%
301461	MAASVLAKTE (PEAKSHAVEN PRODUCTIE)	1,830	1,552	18%
301468	HEMRIK/DONKERBROEK (TULIP OIL)	1,830	2,051	-11%

**B8. Indicative reference prices exit points**

Exit point		Indicative reference price EUR/kWh/h/y		Difference %
ID	Description	Postage stamp	ID	description
300003	GOIRLE (DESSO BV)	1,641	2,053	-20%
300005	PG HOOGERHEIDE (ENEXIS B.V.)	1,641	2,389	-31%
300009	PG GIessen (ENEXIS B.V.)	1,641	1,719	-5%
300011	ALPHEN NB (ENEXIS B.V.)	1,641	1,988	-17%
300012	PG OOSTERHOUT (ENEXIS B.V.)	1,641	2,083	-21%
300016	TILBURG (AGRISTO BV)	1,641	1,976	-17%
300027	PG GENNEP (ENEXIS)	1,641	1,680	-2%
300039	HEUSDEN (ENEXIS B.V.)	1,641	1,854	-12%
300042	PG STEENBERGEN (ENEXIS)	1,641	2,476	-34%
300043	PG THONISSE (ENDURIS)	1,641	2,491	-34%
300049	PRINSENBEK (ENEXIS B.V.)	1,641	2,137	-23%
300050	ROOSENDAAL (ENEXIS)	1,641	2,491	-34%
300052	ZEVENBERGEN (ENEXIS)	1,641	2,408	-32%
300053	PG SPRUNDEL (ENEXIS B.V.)	1,641	2,333	-30%
300057	HELMOND (NEDSCHROEF HELMOND BV)	1,641	1,891	-13%
300060	MAARHEEZE (PHILIPS LIGHTING BV)	1,641	2,111	-22%
300070	MAASTRICHT (STF. GEBR. KLINKERS BV)	1,641	2,501	-34%
300071	BUDEL (NYRSTAR BV)	1,641	2,123	-23%
300072	BUDEL (NEDZINK BV)	1,641	2,123	-23%
300073	MAASTRICHT (ENCI BV)	1,641	2,536	-35%
300074	DONGEN (TROBAS GELATINE BV)	1,641	2,030	-19%
300075	MEERSEN (MARSNA PAPER BV)	1,641	2,497	-34%
300076	MAASTRICHT (KONINKLIJKE MOSA BV)	1,641	2,470	-34%
300078	MAASTRICHT (O-I MANUFACTURING NL BV)	1,641	2,470	-34%
300081	BLERICK (NEDRI SPANSTAAL BV)	1,641	2,125	-23%
300082	EIJSDEN (UMICORE NL BV)	1,641	2,549	-36%
300083	BEESEL (ST. JORIS KERAMISCHE IND. BV)	1,641	2,138	-23%
300085	SWALMEN (CARGILL BV MALT DIVISION)	1,641	2,157	-24%
300088	VEGHEL (FRIESLANDCAMPINA)	1,641	1,764	-7%
300089	KESSEL (KLEIWARENFABRIEK JOOSTEN BV)	1,641	2,158	-24%
300090	EYGELSHOVEN (STF. NIEVELSTEEN BV)	1,641	2,515	-35%
300091	TEGELEN (WIENERBERGER JANSSEN DINGS)	1,641	2,090	-21%
300092	WEERT (ROTO SMEETS BV)	1,641	2,116	-22%
300095	BEEK (UTILITY SUPPORT GROUP BV G-GAS)	1,641	2,355	-30%
300096	BORN (NEDCAR BV)	1,641	2,340	-30%
300097	MAASTRICHT (ANKERPOORT)	1,641	2,439	-33%
300099	OSS (BALL PACKAGING EUROPE BV)	1,641	1,597	3%
300100	EINDHOVEN (DAF TRUCKS NV)	1,641	1,926	-15%
300131	HILVARENBEK (FLUXYS)	1,641	1,934	-15%
VIP_EX1	VIP-L-NCG	1,641	1,373	19%
VIP_EX2	VIP-L-GPL	1,641	0,754	118%
VIP_EX3	VIP-H-NCG	1,641	2,477	-34%
300140	DINXPERLO (BEW)	1,641	1,508	9%
300142	VLIEGHUIS (RWE)	1,641	1,083	51%
VIP_EX4	VIP-H-ZTP	1,641	2,523	-35%
VIP_EX5	VIP-H-GPL	1,641	0,754	118%

300150	ZUTPHEN (AURUBIS NETHERLANDS BV)	1,641	1,262	30%
300153	WIJHE (MEESTER STEGEMAN CV)	1,641	1,167	41%
300161	PG GASSELTENIJVEENSCHMOND (ENEXIS)	1,641	0,760	116%
300162	PG HARDERWIJK (LIANDER)	1,641	1,235	33%
300163	PEIZE (ENEXIS)	1,641	0,780	110%
300164	PG RODEN (ENEXIS)	1,641	0,804	104%
300167	JOURE (JACOBS DOUWE EGBERTS NL BV)	1,641	0,901	82%
300168	PG SCHEEMDERZWAAG (ENEXIS)	1,641	0,773	112%
300171	ANGEREN (STF. HUISSENSWAARD BV)	1,641	1,417	16%
300178	VROOMSHOOP (COGAS)	1,641	1,116	47%
300179	PANNERDEN (WIENERBERGER KIJFWAARD OOST)	1,641	1,434	14%
300183	EMMEN (EMMTEC SERVICES BV)	1,641	0,993	65%
300189	LOBITH (WAALSTF. DE BYLANDT BV)	1,641	1,448	13%
300191	NIJVERDALHELLEDOORN (ENEXIS)	1,641	1,213	35%
300193	VRIEZENVEEN (COGAS)	1,641	1,132	45%
300196	ZWOLLE (SENSUS BV)	1,641	1,069	53%
300197	FRANEKER (HUHTAMAKI NL BV)	1,641	0,968	69%
300200	FOXHOL (AVEBE BA)	1,641	0,740	122%
300201	HOOGVEEN ALTEVEERSTRAAT (DOC KAAS B.V.)	1,641	1,016	62%
300203	DELFIJL (PPG INDUSTRIES CHEMICALS BV)	1,641	0,819	100%
300205	HARDERWIJK (SAPA PROFILES)	1,641	1,220	34%
300210	APELDOORN (KIWA GASTEC NV)	1,641	1,338	23%
300216	NEEDE (DAWO EPS BV)	1,641	1,366	20%
300217	PG DRACHTEN (LIANDER)	1,641	0,796	106%
300220	RENKUM (PARENCO BV)	1,641	1,457	13%
300221	EERBEEK (MAYR-MELNHOF EERBEEK BV)	1,641	1,346	22%
300222	OLDENZAAL (COGAS)	1,641	1,322	24%
300223	NUNSPEET (NESTLE NL BV)	1,641	1,156	42%
300225	HENGELO (AKZO NOBEL ENERGIE BV)	1,641	1,290	27%
300227	HOOGKERK (SOLIDUS SOLUTIONS BV)	1,641	0,780	110%
300231	COEVORDEN (SOLIDUS SOLUTIONS BV)	1,641	1,036	58%
300234	COEVORDEN (RENDO)	1,641	1,032	59%
300236	NIJVERDAL (TEN CATE PROTECT BV)	1,641	1,216	35%
300241	LOCHEM (FRIESLANDCAMPINA)	1,641	1,301	26%
300242	WINSCHOTEN (PHILIPS LIGHTING BV)	1,641	0,773	112%
300245	LOENEN (SOLIDPACK BV)	1,641	1,340	22%
300246	OPHEUSDEN (WIENERBERGER WOLFSWAARD)	1,641	1,491	10%
300249	PG HAREN (ENEXIS)	1,641	0,763	115%
300250	BERGUM (GDF SUEZ ENERGIE NL NV)	1,641	0,792	107%
300251	DELFIJL (DOW BENELUX BV)	1,641	0,794	107%
300262	DELFIJL (AKZO ZOUTCHEMIE)	1,641	0,798	106%
300263	PG DIEREN (LIANDER)	1,641	1,333	23%
300264	BALKBRUG (RENDO)	1,641	0,962	70%
300265	SAPPEMEER (ESKA GRAPHIC BOARD BV)	1,641	0,686	139%
300269	MILLINGEN A/D RIJN (LIANDER)	1,641	1,492	10%
300274	BEILEN (FRIESLANDCAMPINA DOMO)	1,641	0,871	88%
300276	NUNSPEET (LIANDER)	1,641	1,171	40%
300283	PG ENSCHEDE (ENEXIS)	1,641	1,358	21%
300285	NES (STEDIN)	1,641	1,141	44%
300288	SCHOONEBEEK (ALIANCYS BV)	1,641	1,077	52%
300292	OUDE PEKELA (SOLIDUS SOLUTIONS BV)	1,641	0,737	123%
300306	NIEUWE PEKELA (SMURFIT KAPPA TWINCORR)	1,641	0,756	117%
300308	ERLECOM (WIENERBERGER ERLECOM)	1,641	1,442	14%
300309	DRACHTEN (FENNER DUNLOP BV)	1,641	0,801	105%

300311	HOOGEZAND (ESKA GRAPHIC BOARD BV)	1,641	0,728	125%
300314	AZEWIJN (STF. DE NIJVERHEID BV)	1,641	1,430	15%
300319	PG BUINERVEEN (ENEXIS)	1,641	0,970	69%
300321	MALDEN (LIANDER)	1,641	1,587	3%
300322	PG HARDENBERG (COGAS)	1,641	1,021	61%
300325	PG KAMPEN (ENEXIS)	1,641	1,122	46%
300328	VIERVERLATEN (SUIKERUNIE)	1,641	0,776	111%
300330	DINXPERLO (LIANDER)	1,641	1,494	10%
300333	ENSCHEDÉ (APOLLO VREDESTEIN)	1,641	1,328	24%
300338	NORG (ENEXIS)	1,641	0,813	102%
300345	SLOTEN (SLOTEN BV)	1,641	0,983	67%
300348	LEEK (HUNTER DOUGLAS EUROPE BV)	1,641	0,835	96%
300350	HAAKSBERGEN (ENEXIS)	1,641	1,347	22%
300353	GROESBEEK (LIANDER)	1,641	1,618	1%
300355	ZUIDWOLDE (RENDO)	1,641	0,958	71%
300360	PG HOEVELAKEN (LIANDER)	1,641	1,280	28%
300363	HAALDEREN (WIENERBERGER BEMMEL)	1,641	1,402	17%
300366	DEEST (STF. VOGELANGH)	1,641	1,516	8%
300373	LOBITH (LIANDER)	1,641	1,411	16%
300375	WINSCHOTEN (PQ SILICAS BV)	1,641	0,773	112%
300378	DELFZIJL (DELESTO)	1,641	0,826	99%
300380	NIJVERDAL (TEN CATE ADVANCED TEXT. BV)	1,641	1,228	34%
300382	DELFZIJL (ALDEL BV)	1,641	0,812	102%
300394	DEVENTER (AKZO NOBEL POLYMER CHEM. BV)	1,641	1,225	34%
300400	APELDOORN (OWENS CORNING VEIL NL BV)	1,641	1,396	18%
300405	HARDERWIJK (KALKZANDSTF. HARDERWIJK BV)	1,641	1,221	34%
300406	GIESBEEK (LIANDER)	1,641	1,370	20%
300407	LOSSER (ENEXIS)	1,641	1,409	16%
300412	ENTER (COGAS)	1,641	1,226	34%
300420	ZUTPHEN PARKSTRAAT (LIANDER)	1,641	1,272	29%
300423	ENSCHEDÉ (VAN MERKSTEIJN PLASTICS BV)	1,641	1,324	24%
300428	BIDDINGHUIZEN (WALIBI WORLD BV)	1,641	1,201	37%
300436	DOETINCHEM (PAPIERFABRIEK DOETINCHEM BV)	1,641	1,387	18%
300437	OUDE PEKELA (STRATING STEENINDUSTRIE BV)	1,641	0,739	122%
300438	GEESBRUG (RENDO)	1,641	0,961	71%
300443	HENGÉLO (OPRA TURBINES BV)	1,641	1,279	28%
300444	RIJSSEN (ENEXIS)	1,641	1,208	36%
300447	TER APELKANAAL (AVEBE BA)	1,641	0,860	91%
300450	LELYSTAD (CIDC)	1,641	1,314	25%
300451	ENSCHEDÉ (ENNATUURLIJK WKC)	1,641	1,328	24%
300452	DELFZIJL (LAFARGE GIPS BV)	1,641	0,816	101%
300453	GENDT (STF. DE ZANDBERG BV)	1,641	1,435	14%
300464	LOENEN (SMURFIT KAPPA MNL GOLFKARTON)	1,641	1,343	22%
300465	EERBEEK (SCA DE HOOP ENERGIE BV)	1,641	1,338	23%
300467	SPIJK (LIANDER)	1,641	1,451	13%
300469	ZUTPHEN DE HOVEN (LIANDER)	1,641	1,267	29%
300486	VEENDAM (NEDMAG INDUSTRIES BV)	1,641	0,721	128%
300487	HETEREN (WIENERBERGER HETEREN)	1,641	1,469	12%
300489	BAD NIEUWESCHANS (SOLIDUS SOLUTIONS BV)	1,641	0,825	99%
300491	EERBEEK (SANDERS COLDENHOVE)	1,641	1,347	22%
300492	ALMERE (NUON POWER GENERATION B.V.-WKC)	1,641	1,511	9%
300495	ARNHEM (DE KLEEF BV)	1,641	1,383	19%
300500	PG DEVENTER (ENEXIS)	1,641	1,206	36%
300501	SCHARSTERBRUG (PHOENIX BV)	1,641	0,883	86%

300507	NIJMEGEN DE OOO (LIANDER)	1,641	1,430	15%
300516	WORKUM (FRIESLANDCAMPINA CHEESE)	1,641	0,929	77%
300524	ECHTELD (WIENERBERGER SCHIPPERSWAARD BV)	1,641	1,542	6%
300527	NIJMEGEN (MEAD JOHNSON BV)	1,641	1,537	7%
300530	FARMSUM (ZEOLYST CV)	1,641	0,821	100%
300533	DEEST (WIENERBERGER NARVIK DAKPANNEN)	1,641	1,518	8%
300534	HENGELO (SIEMENS NEDERLAND NV)	1,641	1,297	26%
300541	DELFIJL (GDF SUEZ ENERGIE NL-EEMS 3-7)	1,641	0,855	92%
300542	GASSELTERNIJVEEN (AVEBE BA)	1,641	0,853	92%
300546	COLLENDORNERVEEN (GZI NAM BV)	1,641	1,004	63%
300549	HENGELO (TWENCE AFVALSCHEIDING)	1,641	1,292	27%
300552	HARLINGEN (REC BV)	1,641	1,160	41%
300555	BRUMMEN (LIANDER)	1,641	1,306	26%
300556	SPIJK (BV STF. SPIJK)	1,641	1,451	13%
300558	SUAMEER (SONAC BURGUM BV)	1,641	0,851	93%
300564	PG ZOETERMEER (STEDIN)	1,641	1,635	0%
300569	PG DELFT (STEDIN)	1,641	1,674	-2%
300571	PG WESTZAAN (LIANDER)	1,641	1,310	25%
300572	MAASVLAKTE (UNIPER BENELUX NV)	1,641	1,967	-17%
300573	MAASVLAKTE (ECT DELTA TERMINAL BV)	1,641	1,759	-7%
300582	MAASSLUIS (STEDIN)	1,641	1,742	-6%
300585	PG ZALTBOMMEL (LIANDER)	1,641	1,673	-2%
300587	ROTTERDAM (ENCI BV)	1,641	1,804	-9%
300591	PG HAARLEM (LIANDER)	1,641	1,321	24%
300592	PG AMSTELVEEN (STEDIN)	1,641	1,441	14%
300596	PG BLEISWIJK (STEDIN)	1,641	1,598	3%
300599	ZOETERMEER (NUTRICIA BV)	1,641	1,645	0%
300600	PG DORDRECHT (STEDIN)	1,641	1,732	-5%
300601	PG ROTTERDAM (STEDIN)	1,641	1,693	-3%
300603	ROZENBURG (STEDIN)	1,641	1,819	-10%
300606	AMSTERDAM (SONNEBORN BV)	1,641	1,373	20%
300611	KOOG A/D ZAAAN (OLAM COCOA)	1,641	1,303	26%
300617	LEIDEN (UNIPER BENELUX NV)	1,641	1,631	1%
300620	UTRECHT (WARMTE NEWCO B.V.)	1,641	1,455	13%
300622	GORINCHEM (PURAC BIOCHEM BV)	1,641	1,663	-1%
300634	BOSKOOP (LIANDER)	1,641	1,601	2%
300637	HILVERSUM DE MEENT (LIANDER)	1,641	1,380	19%
300638	EUROPOORT (ADM)	1,641	1,905	-14%
300639	HOEK VAN HOLLAND (STEDIN)	1,641	1,757	-7%
300640	DORDRECHT (DESCO CV)	1,641	1,697	-3%
300642	PURMEREND CANTERWEG (LIANDER)	1,641	1,413	16%
300644	SASSENHEIM (AKZO NOBEL CAR REFINISHES)	1,641	1,492	10%
300645	DEN HAAG (UNIPER BENELUX NV)	1,641	1,707	-4%
300648	ALBLASSERDAM (FNSTEEL BV)	1,641	1,708	-4%
300649	EUROPOORT (BP RAFFINADERIJ ROTTERDAM BV)	1,641	1,907	-14%
300650	MAURIK (LIANDER)	1,641	1,462	12%
300651	WASSENAAR (LIANDER)	1,641	1,534	7%
300652	OUDERKERK A/D AMSTEL (STEDIN)	1,641	1,445	14%
300655	PG IJMUIDEN (LIANDER)	1,641	1,281	28%
300662	PG BEVERWIJK (STEDIN)	1,641	1,256	31%
300663	BOTLEK (AIR LIQUIDE INDUSTRIE BV: SMR)	1,641	1,805	-9%
300664	ZOETERWOUDE (HEINEKEN NL BV)	1,641	1,551	6%
300665	BOTLEK (AIR LIQUIDE INDUSTRIE BV: ATR)	1,641	1,803	-9%
300669	PG NAALDWIJK (WESTLAND)	1,641	1,710	-4%

300670	MAASVLAKTE DISTRIK (STEDIN)	1,641	1,764	-7%
300674	AMSTERDAM (ALBEMARLE CATALYSTS COMPANY)	1,641	1,420	16%
300675	AMSTERDAM (ICL FERTILIZERS EUR.)	1,641	1,409	16%
300680	BOTLEK (VOPAK TERMINAL CHEMIEHAVEN BV)	1,641	1,797	-9%
300681	EUROPOORT (EXXON MOBIL CHEMICAL NL BV)	1,641	1,866	-12%
300683	ZWIJNDRECHT (UNIMILLS BV)	1,641	1,760	-7%
300684	ROTTERDAM (CEREXAGRI BV)	1,641	1,736	-5%
300685	AMSTERDAM (NUON POWER GENERATION BV)	1,641	1,392	18%
300686	BOTLEK (CARGILL BV)	1,641	1,788	-8%
300687	BOTLEK (AIR LIQUIDE IND. BV: EUROGEN)	1,641	1,805	-9%
300691	PG VLAARDINGEN (STEDIN)	1,641	1,710	-4%
300692	OUDENHOORN (FARMFRIES BV)	1,641	1,875	-13%
300693	BOTLEK (CLIMAX MOLYBDENUM BV)	1,641	1,800	-9%
300694	BOTLEK (ASFALT CENTRALE ROTTERDAM BV)	1,641	1,757	-7%
300696	ROTTERDAM (UNIPER BENELUX NV)	1,641	1,617	1%
300703	EEMNES (ASFALTPRODUCTIE DE EEM BV)	1,641	1,319	24%
300705	BEVERWIJK (HHN-SDI)	1,641	1,247	32%
300706	WORMERVEER (LODERS CROKLAAN B.V.)	1,641	1,325	24%
300710	BERGEN NH. (LIANDER)	1,641	1,235	33%
300711	BOTLEK (CABOT BV)	1,641	1,801	-9%
300712	WOERDEN (MONIER BV WOERDEN)	1,641	1,531	7%
300713	BOTLEK (ALUMINIUM & CHEMIE ROTTERDAM BV)	1,641	1,756	-7%
300716	EUROPOORT (INDORAMA HOLDINGS ROTTERDAM)	1,641	1,921	-15%
300719	EGMOND AAN ZEE (LIANDER)	1,641	1,240	32%
300722	PUTTERSHOEK (KONINKLIJKE COÖPERATIE COSUN UA)	1,641	1,789	-8%
300725	ZWIJNDRECHT (ASHLAND INDUSTRIES NEDERLAND BV)	1,641	1,759	-7%
300727	PG ZEIST (STEDIN)	1,641	1,450	13%
300728	TEXEL (LIANDER)	1,641	1,305	26%
300729	BOTLEK (RUBIS TERMINAL BV)	1,641	1,787	-8%
300734	VLAARDINGEN (UNILEVER R&D)	1,641	1,736	-5%
300736	BOTLEK (EMERALD KALAMA CHEMICALS BV)	1,641	1,797	-9%
300737	BOTLEK (VALT ASPHALT TERMINALS BV)	1,641	1,797	-9%
300747	BOTLEK (ALMATIS BV)	1,641	1,806	-9%
300748	VLAARDINGEN (ALIPHOS ROTTERDAM BV)	1,641	1,731	-5%
300754	VELSEN NOORD (LIANDER)	1,641	1,256	31%
300755	VOLENDAM (LIANDER)	1,641	1,467	12%
300758	MONNICKENDAM (LIANDER)	1,641	1,486	10%
300767	WORMER (OLAM COCOA)	1,641	1,330	23%
300768	BOTLEK (TRONOX PIGMENTS HOLLAND BV)	1,641	1,812	-9%
300771	EUROPOORT (MAATSCHAP EUROPOORT TERMINAL)	1,641	1,849	-11%
300772	KROMMENIE (FORBO FLOORING BV)	1,641	1,273	29%
300773	DELFT (DSM FOOD SPECIALTIES BV)	1,641	1,641	0%
300779	IJMUIDEN (TATA STEEL IJMUIDEN BV)	1,641	1,281	28%
300784	SCHIPHOL (FLP NETWERKEN BV)	1,641	1,455	13%
300785	KOOG A/D ZAAAN (TATE & LYLE NL BV)	1,641	1,304	26%
300786	EUROPOORT MOEZELWEG (VOPAK TERMINAL BV)	1,641	1,840	-11%
300790	MIDDELHARNIS (STEDIN)	1,641	1,928	-15%
300791	EUROPOORT (GREIF NL BV)	1,641	1,833	-10%
300792	ROSSUM (LIANDER)	1,641	1,680	-2%
300794	ASPEREN (STEDIN)	1,641	1,675	-2%
300795	DEN HAAG (HAC BV)	1,641	1,627	1%
300798	AMSTERDAM (EUROTANK AMSTERDAM BV)	1,641	1,405	17%
300800	EUROPOORT (CALDIC BV)	1,641	1,865	-12%

300802	DUIVENDRECHT (STEDIN)	1,641	1,419	16%
300803	BOTLEK (ODFJELL TERMINALS ROTTERDAM BV)	1,641	1,762	-7%
300804	BOTLEK (LBC ROTTERDAM BV)	1,641	1,790	-8%
300808	PERNIS (AVR INDUSTRIAL WASTE NV)	1,641	1,815	-10%
300809	HALFWEG (STEDIN)	1,641	1,333	23%
300812	ABBENBROEK (STEDIN)	1,641	1,816	-10%
300813	OUDENHOORN RUIGENDIJK (STEDIN)	1,641	1,840	-11%
300814	BOTLEK (AKZO NOBEL INDUSTRIAL CHEM BV)	1,641	1,777	-8%
300816	BOTLEK (KEPPEL VEROLME BV)	1,641	1,821	-10%
300822	PG MOERKAPELLE (LIANDER)	1,641	1,579	4%
300823	BERGSCHENHOEK WILD. KADE (STEDIN)	1,641	1,636	0%
300825	AMSTERDAM (NUGRO VOF)	1,641	1,353	21%
300827	BOTLEK (ESSO NL BV)	1,641	1,769	-7%
300829	HAAFTEN (WIENERBERGER HAAFTEN)	1,641	1,649	0%
300830	VELSEN (PF. CROWN VAN GELDER NV)	1,641	1,262	30%
300840	VUREN (SONAC VUREN BV)	1,641	1,644	0%
300843	BOTLEK (SERVICE TERMINAL ROTTERDAM VOF)	1,641	1,818	-10%
300844	VUREN (XELLA CELLENBETON NL BV)	1,641	1,660	-1%
300846	KROMMENIE (FORBO FLOORING CORAL NV)	1,641	1,272	29%
300847	VELSEN (NUON POWER GENERATION BV)	1,641	1,270	29%
300851	AMSTERDAM OCEANENWEG (CARGILL BV)	1,641	1,361	21%
300852	AMSTERDAM COENHAVENWEG (BUNGE NETHERLANDS BV)	1,641	1,403	17%
300854	ABBEKERK (GRASDROGERIJ HARTOG BV)	1,641	1,061	55%
300855	BOTLEK (HOYER NL BV)	1,641	1,754	-6%
300856	ALKMAAR (NV HVC)	1,641	1,168	40%
300857	EUROPOORT (GUNVOR PETROLEUM)	1,641	1,868	-12%
300858	PERNIS (SHELL NL RAFFINADERIJ BV)	1,641	1,752	-6%
300887	PG MOERDIJK (ENEXIS B.V.)	1,641	2,506	-35%
300888	SLUISKIL (YARA BV H-GAS)	1,641	2,381	-31%
300889	EINDHOVEN (ENNATUURLIJK WKC)	1,641	1,904	-14%
300892	MOERDIJK (ARDAGH GLASS BV)	1,641	2,400	-32%
300893	GELEEN (RWE GENERATION NL – WKC SWENTIBOLD)	1,641	2,379	-31%
300895	SOMEREN (KIEVITSAKKERS BV)	1,641	1,981	-17%
300896	TEGELEN (WIENERBERGER NARVIK DAKPANNEN)	1,641	2,088	-21%
300899	OSS (MERCK MSD OSS BV)	1,641	1,601	2%
300903	LIESHOUT (BAVARIA NV)	1,641	1,810	-9%
300905	KERKRADE (E-MAX)	1,641	2,532	-35%
300906	ROSENDAAL (SENSUS BV)	1,641	2,486	-34%
300907	HELMOND (J.A. RAYMAKERS & CO BV)	1,641	1,890	-13%
300908	KLUNDERT (SHELL NL CHEMIE BV)	1,641	2,420	-32%
300909	VLISSINGEN (ZEELAND REFINERY)	1,641	2,715	-40%
300910	TILBURG (FUJIFILM MANUFACTUR. EUROPE BV)	1,641	1,977	-17%
300911	HELMOND (ENNATUURLIJK SV)	1,641	1,911	-14%
300912	BORN (FRIESLANDCAMPINA CHEESE)	1,641	2,308	-29%
300916	PG MAASTRICHT (ENEXIS)	1,641	2,482	-34%
300923	PG GRONSVELD (ENEXIS)	1,641	2,512	-35%
300927	SITTARD (ENEXIS)	1,641	2,377	-31%
300940	TEGELEN (MONIER BV TEGELEN)	1,641	2,082	-21%
300942	VOERENDAAL (ENEXIS)	1,641	2,601	-37%
300952	NUTH (ENEXIS)	1,641	2,385	-31%
300958	NEDERWEERT (ENEXIS)	1,641	2,067	-21%
300965	OUD GASTEL (ENEXIS)	1,641	2,499	-34%
300968	VEGHEL (MARS NEDERLAND BV)	1,641	1,761	-7%
300975	ROERMOND (SMURFIT KAPPA ROERMOND PAPIER)	1,641	2,188	-25%

300983	DRUNEN (SAPA PROFILES)	1,641	1,830	-10%
300991	OOSTRUM (RIXONA BV)	1,641	1,895	-13%
300997	CUYK (NUTRICIA BV)	1,641	1,700	-3%
301002	GEERTRUIDENBERG (RWE GENERATION NL – AMERC)	1,641	2,068	-21%
301006	DINTELOORD (SUIKERUNIE)	1,641	2,490	-34%
301009	HELMOND (VLISCO BV)	1,641	1,884	-13%
301013	ACHT (VDL ETG EINDHOVEN BV)	1,641	1,880	-13%
301014	OUDENBOSCH (HUNTER DOUGLAS EUROPE BV)	1,641	2,435	-33%
301015	OEFFELT (STF. ENGELS BV)	1,641	1,727	-5%
301016	DONGEN (COCA-COLA ENTERPRISES NL BV)	1,641	1,996	-18%
301017	DONGEN (ARDAGH GLASS DONGEN BV)	1,641	1,996	-18%
301021	TILBURG (IFF NL BV)	1,641	1,950	-16%
301022	SON (RENDAC BV)	1,641	1,893	-13%
301024	BERGEN OP ZOOM (ALLNEX NETHERLANDS BV)	1,641	2,407	-32%
301027	ETTEN-LEUR (ST-GOBAIN CONSTR.PROD.NED)	1,641	2,200	-25%
301028	DRUNEN (LDM BV)	1,641	1,832	-10%
301029	HEDIKHUIZEN (STF. HEDIKHUIZEN BV)	1,641	1,882	-13%
301031	BREDA (SYNTHOS BREDA BV)	1,641	2,119	-23%
301033	OSS (UNILEVER BESTFOODS NL)	1,641	1,600	3%
301034	BERGEN OP ZOOM (ASFALTPRODUKTIE MIJ BV)	1,641	2,403	-32%
301037	PG WABEWEST (ENDURIS)	1,641	2,758	-41%
301038	SWALMEN (VAN HOUTUM BV)	1,641	2,162	-24%
301039	BEEK EN DONK (HITMETAL/THIBODRAAD BV)	1,641	1,776	-8%
301040	ST. OEDENRODE (AHREND PROD. BEDRIJF BV)	1,641	1,818	-10%
301042	SAS VAN GENT (ROSIER NEDERLAND BV)	1,641	2,464	-33%
301043	WEERT (TRESPA INTERNATIONAL BV)	1,641	2,096	-22%
301045	HEERLEN (SIBELCO BENELUX)	1,641	2,460	-33%
301046	PG SCHOONDIJKE (ENDURIS)	1,641	2,611	-37%
301049	PG AXTER (ENDURIS)	1,641	2,414	-32%
301050	TERNEUZEN (DOW BENELUX BV)	1,641	2,482	-34%
301051	MIDDELBURG (EASTMAN CHEMICAL BV)	1,641	2,787	-41%
301052	PG KRUILAND (ENDURIS)	1,641	2,426	-32%
301054	PG HOESAS (ENDURIS)	1,641	2,447	-33%
301056	ZONNEMAIRE (ENDURIS)	1,641	2,029	-19%
301060	KERKRADE (JINDAL FILMS EUR. KERKRADE BV)	1,641	2,532	-35%
301063	DEN BOSCH (RWE GENERATION NL - WKC HEINEKEN)	1,641	1,761	-7%
301064	MAASTRICHT (SAPPI MAASTRICHT BV)	1,641	2,469	-34%
301065	LANDGRAAF (XELLA CELLENBETON NL BV)	1,641	2,480	-34%
301080	EMMEN GZI (NAM)	1,641	1,456	13%
301097	ROTTERDAM WESTGAS (NAM)	1,641	1,732	-5%
301114	GRIJPSKERK (NAM - UGS)	0,820	0,355	131%
301116	NORG (NAM - UGS)	0,820	0,368	123%
301118	ALKMAAR (TAQA - PGI)	0,820	0,584	40%
301120	ALKMAAR (TAQA)	1,641	1,168	40%
301129	PG HOLESTEEN (ENDURIS)	1,641	2,398	-32%
301144	SLUISKIL (YARA BV-G-GAS)	1,641	2,382	-31%
301148	GELEEN (UTILITY SUPPORT GROUP BV H_GAS)	1,641	2,345	-30%
301152	MAASVLAKTE (LYONDELL BAYER MANUF. VOF)	1,641	1,780	-8%
301153	MAASVLAKTE (UNIPER BENELUX NV UMCL)	1,641	1,773	-7%
301159	BOEKELO (GROLSCH BIERBROUWERIJ BV)	1,641	1,331	23%
301164	AMSTERDAM (STARBUCKS MANUF. EMEA BV)	1,641	1,358	21%
301177	HOOGVEEN BUITENVAART (DOC KAAS B.V.)	1,641	0,951	73%
301178	BOTLEK (RIJNMOND POWER HOLDING BV)	1,641	1,758	-7%
301180	BEMMEL (LINGEZEGEN ENERGY B.V. )	1,641	1,387	18%

301182	DE STEEG (FACILITY SERVICES HAVELAND BV)	1,641	1,342	22%
301185	OUDE STATENZIJL RENATO (OGE)	0,820	0,377	118%
301193	SCHIEDAM (STEDIN)	1,641	1,694	-3%
301194	PG HOUTEN (STEDIN)	1,641	1,464	12%
301195	PG HOOGLAND (STEDIN)	1,641	1,324	24%
301196	PG VEENENDAAL (STEDIN)	1,641	1,431	15%
301198	ENSCHDEDE (INNOGY-UGS EPE)	0,820	0,718	14%
301199	BORCULO (FRIESLANDCAMPINA DOMO)	1,641	1,362	20%
301203	PG HELDEN (ENEXIS)	1,641	1,975	-17%
301206	PG HOOGVEEEN (RENDO)	1,641	0,993	65%
301207	PG ECHTEN (RENDO)	1,641	1,029	60%
301220	PG ALMELO (COGAS)	1,641	1,270	29%
301222	NG DEN HAAG (STEDIN)	1,641	1,639	0%
301230	PG BERGEN OP ZOOM (ENEXIS)	1,641	2,411	-32%
301232	PG BREDA (ENEXIS)	1,641	2,111	-22%
301233	PG DONGEN (ENEXIS)	1,641	1,948	-16%
301234	PG ETTEN-LEUR (ENEXIS)	1,641	2,162	-24%
301235	PG GILZE (ENEXIS)	1,641	2,000	-18%
301238	PG VLIJMEN (ENEXIS)	1,641	1,840	-11%
301239	PG ARCEN (ENEXIS)	1,641	1,995	-18%
301240	PG GELEEN (ENEXIS)	1,641	2,474	-34%
301241	PG HEERLEN (ENEXIS)	1,641	2,472	-34%
301242	PG HERKENBOSCH (ENEXIS)	1,641	2,239	-27%
301243	PG KERKRADE (ENEXIS)	1,641	2,499	-34%
301244	PG ROERMOND (ENEXIS)	1,641	2,180	-25%
301245	PG VENLO (ENEXIS)	1,641	2,133	-23%
301246	PG ASSEN (ENEXIS)	1,641	0,849	93%
301248	PG GRONINGEN STAD (ENEXIS)	1,641	0,766	114%
301249	PG HENGEL (ENEXIS)	1,641	1,298	26%
301250	PG MIDWOLDA (ENEXIS)	1,641	0,753	118%
301251	PG OMMEN (ENEXIS)	1,641	1,047	57%
301252	PG RAALTE (ENEXIS)	1,641	1,178	39%
301253	PG WINSCHOTEN (ENEXIS)	1,641	0,765	114%
301254	PG ZWOLLE (ENEXIS)	1,641	1,087	51%
301257	PG AMSTERDAM (LIANDER)	1,641	1,410	16%
301259	PG ARNHEM (LIANDER)	1,641	1,426	15%
301263	PG DRUTEN (LIANDER)	1,641	1,529	7%
301264	PG EEFDE (LIANDER)	1,641	1,241	32%
301265	PG ELST (LIANDER)	1,641	1,447	13%
301271	PG NIJMEGEN (LIANDER)	1,641	1,528	7%
301273	PG WEZEP (LIANDER)	1,641	1,121	46%
301275	PG ZEVENAAR (LIANDER)	1,641	1,377	19%
301304	MAASVLAKTE (IOI LODERS CROKLAAN OILS BV)	1,641	1,799	-9%
301305	BLEISWIJK (TUINBOUWCOMBINATIE)	1,641	1,622	1%
301306	PERNIS (AIR LIQUIDE PERGEN)	1,641	1,772	-7%
301309	ENSCHDEDE (NUON-UGS EPE)	0,820	0,717	14%
301312	ZANDVLIET (WINGAS-H)	1,641	2,147	-24%
301313	SPIJK GLD. (WELLMAN RECYCLING)	1,641	1,424	15%
301319	DELFIJL (EVONIK PEROXIDE NL BV)	1,641	0,823	99%
301320	ZUIDWENDING (UGS)	0,820	0,357	130%
301321	ROTTERDAM (ABENGOA BIOENERGY NL BV)	1,641	1,858	-12%
301323	PG GROENLO (LIANDER)	1,641	1,407	17%
301324	PG DOETINCHEM (LIANDER)	1,641	1,372	20%
301325	PG ALPHEN A/D RIJN (LIANDER)	1,641	1,557	5%

301327	PG OOSTBETUWE (LIANDER)	1,641	1,395	18%
301328	PG HOORN (LIANDER)	1,641	1,140	44%
301331	DELFIJL (BIO-METHANOL CHEMIE NL BV)	1,641	0,825	99%
301337	LELYSTAD (GDF SUEZ ENERGIE NL NV-MAXIMA)	1,641	1,279	28%
301338	BOTLEK DISTRIK (WESTLAND)	1,641	1,807	-9%
301343	ROTTERDAM (EUROMAX TERMINAL)	1,641	1,806	-9%
301344	ROTTERDAM (ENECOGEN VOF)	1,641	1,761	-7%
301348	BERGERMEER (TAQA-UGS)	0,820	0,582	41%
301354	NIEUW HINKELOORD (DELTA-ZBL)	1,641	2,142	-23%
301355	WIERINGERMEER (ENRGIE COMB. W'MEER-RNB)	1,641	1,023	60%
301356	RIJNSMOND (MAASTROOM ENERGIE CV)	1,641	1,758	-7%
301360	OUDE STATENZIJL (ETZEL-EKB-H)	0,820	0,377	118%
301361	OUDE STATENZIJL (EWE-H)	0,820	0,377	118%
301364	DEN HAAG (HTM)	1,641	1,689	-3%
301365	EUROPOORT NECKARWEG (VOPAK TERMINAL BV)	1,641	1,837	-11%
301366	BOTLEK (HUNTSMAN HOLLAND BV)	1,641	1,799	-9%
301369	SCHOONEBEEK (NAM)	1,641	1,445	14%
301374	BOTLEK (VOPAK TERMINAL BV)	1,641	1,795	-9%
301377	ROZENBURG (AIR LIQUIDE-HERACLES)	1,641	1,788	-8%
301385	NG WADDINXVEEN (STEDIN)	1,641	1,579	4%
301389	MAASBREE (WAYLAND NOVA BV)	1,641	1,943	-16%
301390	MAASVLAKTE (NESTE OIL NETHERLANDS BV)	1,641	1,797	-9%
301391	OUDE STATENZIJL (ASTORA JEMGUM)	0,820	0,377	118%
301395	BERGEN OP ZOOM (PHILLIP MORRIS HOLLAND)	1,641	2,446	-33%
301396	EEMSHAVEN (NUON MAGNUMCENTRALE)	1,641	0,883	86%
301397	ENSCHDEDE (ENECO-UGS EPE)	0,820	0,708	16%
301400	OUDE STATENZIJL (ETZEL-CRYSTAL-H)	0,820	0,377	118%
301401	OUDE STATENZIJL (ETZEL-FREYA-H)	0,820	0,377	118%
301420	NIEUW VENNEP (LIANDER)	1,641	1,431	15%
301427	ROTTERDAM-AIR PRODUCTS NL BV	1,641	1,758	-7%
301429	DIEMEN (NUON POWER GENERATION BV)	1,641	1,567	5%
301431	STEENDEREN (AVIKO BV)	1,641	1,268	29%
301432	NG BRIELLE (STEDIN)	1,641	1,883	-13%
301433	NG HEEMSTEDEN (STEDIN)	1,641	1,401	17%
301434	NG GOUDA (STEDIN)	1,641	1,610	2%
301435	NG HOEKSE WAARD (STEDIN)	1,641	1,843	-11%
301436	NG KRIMPEN (STEDIN)	1,641	1,664	-1%
301437	NG LEERDAM (STEDIN)	1,641	1,671	-2%
301438	NG NOORD-OOST FRIESLAND (STEDIN)	1,641	0,844	94%
301439	NG HILVERSUM (LIANDER)	1,641	1,389	18%
301441	PERNIS (WILMAR)	1,641	1,735	-5%
301442	PERNIS (RECYCLING KOMBINATIE REKO BV)	1,641	1,735	-5%
301443	PERNIS (KOOLE)	1,641	1,735	-5%
301445	DINTELOORD (TUINBOUW DINTELOORD)	1,641	2,491	-34%
301446	MARKNESSE (TUINBOUW LUTTELGEEST)	1,641	1,097	50%
301451	OOSTERBIERUM (LAMB WESTON)	1,641	0,980	67%
301453	OUDE STATENZIJL (EWE JEMGUM)	0,820	0,377	118%
301455	SLOE (ENDURIS)	1,641	2,746	-40%
301461	MAASVLAKTE (PEAKSHAVER PRODUCTIE)	1,641	1,786	-8%
301470	BOTLEK (AIR PRODUCTS NL BV)	1,641	1,797	-9%
301471	NG FLEVOLAND (LIANDER)	1,641	1,340	22%
301472	NG LEIDEN-KATWIJK (LIANDER)	1,641	1,526	8%
301473	NG APELDOORN (LIANDER)	1,641	1,339	22%
301474	NG SAAKSUM (ENEXIS)	1,641	0,835	97%

301475	NG FRIESLAND ZUID-WEST (LIANDER)	1,641	0,887	85%
301476	NG VOLLENHOVE (ENEXIS)	1,641	1,083	52%
301477	NG NOORDOOSTPOLDER (LIANDER)	1,641	1,108	48%
301478	NG LEEUWARDEN (LIANDER)	1,641	0,882	86%
301479	NG HINDELOOPEN (LIANDER)	1,641	0,925	77%
301480	NG OOSTEREND (LIANDER)	1,641	1,158	42%
301481	NG FRIESLAND ZUID-OOST (LIANDER)	1,641	0,816	101%
301482	NG FRIESLAND NOORD-WEST (LIANDER)	1,641	0,943	74%
301483	NG FRIESLAND MIDDEN (LIANDER)	1,641	0,850	93%
301484	NG WESTSTELLINGWERF (LIANDER)	1,641	0,939	75%
301485	NG VLIELAND (LIANDER)	1,641	1,316	25%
301486	PERNIS (WESTLAND)	1,641	1,779	-8%
301487	EUROPOORT (WESTLAND)	1,641	1,860	-12%
301489	FRANKRIJKWEG (ENDURIS)	1,641	2,701	-39%
301496	NG EINDHOVEN (ENEXIS)	1,641	1,930	-15%
301497	NG DEN BOSCH (ENEXIS)	1,641	1,737	-6%
301498	NG TILBURG (ENEXIS)	1,641	1,940	-15%
301499	MAASHEES (ENEXIS)	1,641	1,925	-15%
301500	OEFFELT (ENEXIS)	1,641	1,724	-5%
301501	LANDHORST (ENEXIS)	1,641	1,683	-2%
301502	MILL (ENEXIS)	1,641	1,744	-6%
301503	CUYK (ENEXIS)	1,641	1,675	-2%
301504	GRAVE (ENEXIS)	1,641	1,611	2%
301505	SCHIJNDEL (ENEXIS)	1,641	1,882	-13%
301506	BEEK EN DONK WEST (ENEXIS)	1,641	1,829	-10%
301507	AARLE-RIXTEL (ENEXIS)	1,641	1,834	-11%
301508	NG DEURNE (ENEXIS)	1,641	1,933	-15%
301509	NG BOXMEER (ENEXIS)	1,641	1,753	-6%
301510	NG UDEN-ZEELAND (ENEXIS)	1,641	1,624	1%
301512	NG HELMOND-MILHEEZE-MIERLO (ENEXIS)	1,641	1,905	-14%
301513	NG ALKMAAR-DEN HELDER (LIANDER)	1,641	1,219	35%
301514	NG RIJSSENHOUT-BADHOEVEDORP (LIANDER)	1,641	1,406	17%
301515	NG WAARDENBURG-GELDERMALSEN (LIANDER)	1,641	1,613	2%
301521	PG WEERT (ENEXIS)	1,641	2,059	-20%
301522	PG WEERT TRANCHEEWEG(ENEXIS)	1,641	2,090	-21%
301523	SCHIPHOL WEST (SCHIPHOL GROUP)	1,641	1,442	14%

113. ACM is adopting this decision with due regard to the interests, rules, and requirements as meant in Article 12f of the Dutch Gas Act.

The Hague,

The Netherlands Authority for Consumers and Markets,  
 on its behalf:

Dr F. J. H. Don  
 board member