

CONSULTATION DOCUMENT
pursuant to Article 28 of the Commission Regulation (EU) 2017/460
of 17 March 2017 establishing a network code on harmonized
transmission tariff structures for gas

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1. Legal basis¹

On 6 April 2017, the Tariff Code² came into force and it has been applied since that date, with the exception of the provisions of Chapters VI and VIII, which have been applied since 1 October 2017 and Chapters II, III and IV, which will apply as of 31 May 2019.

The purpose of the Tariff Code is to harmonize the transmission tariff structures of the Member States' operators and determining certain tools enabling to compare transmission tariffs applied in the EU, while maintaining flexibility in the selection of elements of the reference price method allowing adjustment to the maturity level of a given market and the level of transmission network complexity.

Pursuant to Article 23 item 2 section 11a of the Energy Law Act, the remit of activity of the President of ERO includes, among others, (...) performance of the regulatory authority's obligations arising from ordinances adopted based on Article 8 and Article 23 of Regulation 715/2009³ (including the Tariff Code).

The following consultation with the regulatory authorities of all directly connected EU Member States and with relevant stakeholders, in the light of Article 28 of the Tariff Code, refers to:

- a) the level of multipliers,
- b) if applicable, the level of seasonal factors and their calculations specified in Article 15 of the Tariff Code,
- c) the levels of discounts at entry points from the LNG terminal and discounts applied to calculate the reserve prices for standard capacity products for interruptible capacity set out in Article 9 item 2 and Article 16 of the Tariff Code.

The consultation is carried out simultaneously with the consultation referred to in Article 26 item 1 of the Tariff Code, regarding the methodology of setting the reference price. By means of a decision of the President of ERO dated 16 July 2018, Operator Gazociągów Przesyłowych GAZ-SYSTEM S.A., hereinafter referred to as "the Operator" or "TSO", was designated an entity responsible for carrying out these consultations – that is for performing the obligations specified in Articles 5, 26 and 27 item 1 of the Tariff Code with respect to: (1) its own transmission network and (2) the transmission network owned by the energy company SGT EuRoPol GAZ SA, hereinafter referred to as "EuRoPol", on which the Operator performs the function of a gas transmission system operator.

Once the consultations have been completed, pursuant to Article 41 (6) (a) of Directive 2009/73/EC, a reasoned decision shall be taken relating to the aspects referred to in sections a)-c) of this item. The national regulatory authority shall consider the positions of the regulatory authorities of the directly connected Member States.

¹ In case of any inconsistencies between the Polish and English version of the hereby document, the Polish version shall prevail,

² Commission Regulation (EU) 2017/460 of 16 March 2017 establishing a network code on harmonized transmission tariff structures for gas (OJ L 72 of 17.03.2017, p. 29),

³ Commission Regulation (EC) 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 (OJ L 211 of 14.08.2009, p. 36).

2. Implementation

2.1. Deadlines.

This document has been developed and published under consultation carried out by the President of ERO for gas transmission tariffs, with respect to (1) the transmission network owned by the TSO and (2) the transmission network owned by EuRoPol.

In the consultation process in September and October 2018, stakeholders may send their comments by 31 October 2018 to the e-mail address: nctar@ure.gov.pl.

Once the consultation has been completed, the President of ERO, pursuant to Article 28 items 2 and 3 of the Tariff Code, shall take a decision relating to the aspects referred to in Article 28 item 1 of the Tariff Code with respect to the transmission network of the TSO and the network owned by EuRoPol, considering the positions of the regulatory authorities of directly connected Member States.

The decision on the aspects under consultations shall be published in the form of the President of ERO communiqué by the end of March 2019.

Subsequent consultations will be carried out in each tariff period, starting from the date of adoption of the above mentioned decision.

2.2. Important factors in these consultations.

When taking a decision on the consulted aspects, the President of ERO takes into account the responses received under the consultation, and:

a) with regard to multipliers:

- the balance between facilitation of short-term gas trading, and providing long-term signals for efficient investment in the transmission system,
- the impact on the transmission services revenue and its recovery,
- the need to avoid cross-subsidisation between network users and to enhance cost-reflectivity of reserve prices,
- situations of physical and contractual congestion,
- the impact on cross-border flows,

b) with regard to seasonal factors:

- impact on facilitating the economic and efficient utilisation of the infrastructure,
- the need to improve the cost-reflectivity of reserve prices.

Both the Operator and EuRoPol will take into account the decision of the President of ERO on the consulted aspects in the calculation of tariffs for gas transmission services submitted for approval. These provisions will apply to settlements with users of the transmission system.

3. Polish natural gas transmission system

The Polish natural gas transmission system consists, in particular, of the transmission system owned by the TSO and the transmission system owned by EuRoPol.

The TSO holds a licence for the transmission of gaseous fuels in the territory of the Republic of Poland, granted by the decision of the President of ERO of 30 June 2004, ref. no.: PPG/95/6154/W/2/2004/MS (as amended).

By the decision of 23 June 2006, ref. no.: DPE-47-4(2)/6154/2006/BT (as amended), the President of ERO designated the TSO as the operator of the gas transmission system in the territory of the Republic of Poland for the period up to 31 December 2030. Then, by the decision of 17 November 2010, ref. no.: DPE-4720-4(8)/2010/6154/BT, the President of ERO, ex officio, designated the TSO as the operator of the gas transmission system on the section of the Yamal-West Europe gas pipeline, located in the territory of the Republic of Poland, whose owner is EuRoPol, for the period up to 31 December 2025.

The current way of functioning of the part of the transmission system owned by EuRoPol is also affected by acquired rights related to the so-called historical contracts. This issue is regulated by the Act of 26 July 2013 amending the Energy Law Act and certain other acts (Journal of Laws of 2013 item 984) – hereinafter referred to as "the amending Act".

Pursuant to Article 22 item 1 of the amending Act, energy enterprises, which were owners of the transmission network as at 3 September 2009, maintained the right to execute contracts on providing gaseous fuels transmission services, concluded before that date, until they expire, with no option to be extended. At the same time, as stipulated in Article 23 of this Act, to the contracts on entrusting the duties of the gas transmission system operator, concluded before the entry into force of the amending Act, the current provisions shall apply until the expiry of the contracts referred to in Article 22 of this Act (that is the so-called historical contracts). The need for such rules arose from the necessity to protect acquired rights. This solution has been accepted in the TSO certification process by the European Commission.

As a result, during the transitional period (that is during the period when historical gas transmission contracts remain valid), both the Operator and EuRoPol, pursuant to Article 47 item 1 of the Energy Law Act, according to the licences held, calculate separate tariffs with respect to own transmission networks and submit them to the President of ERO for approval. In connection with the above, also the consultation referred to in Article 28 item 1 sections a)-c) of the Tariff Code, during the transitional period will be implemented separately in the scope of TSO and EuRoPol tariffs.

Tariffs for gas transmission services for 2019 for the above mentioned enterprises have been approved, taking into account the provisions of the Ordinance of the Minister of Energy of 15 March 2018 on detailed rules for shaping and calculating tariffs and settlements in trading in gaseous fuels (Journal of Laws of 2018, item 640) - hereinafter referred to as "the tariff ordinance". The provisions of this ordinance govern the settlement of short-term and interrupted gas transmission services differently than the Tariff Code, whose provisions in this area will be applied only as of 31 May 2019. Therefore, the results of the first consultation of the President of

ERO referred to in Article 28 of the Tariff Code, will be included in tariffs for 2020 and in a publication made by the Operator pursuant to Article 29 of the Tariff Code, that is no later than 30 days before the annual capacity auction, which will take place in July 2019.

4. Consultations regarding the TSO tariff

4.1. Multipliers referred to in Article 28 item 1 section a) of the Tariff Code

In Article 13 item 1 of the Tariff Code, the permissible values of multipliers for the following capacity products have been specified:

- quarterly and monthly standard capacity products - not less than 1 and not more than 1.5;
- daily and within-day standard capacity products - not less than 1 and not more than 3 (in duly justified cases, the level of multiplier may be less than 1, but higher than 0, or higher than 3).

The proposed multiplier values for standard capacity products are shown in Table 1.

Table 1. Values of multipliers for standard capacity products proposed for the year 2020.

Gas transmission service	Within-day	Daily	Monthly	Quarterly
Multiplier	2.20	2.20	1.45	1.27

The above multipliers fall within the allowable ranges specified in the Tariff Code and will be applied both at interconnection points and at internal points of the gas transmission system (for gas E and L).

4.2. Justification for the proposed level of multipliers.

The calculated multiplier values are intended to incentivize gas system users to book long-term capacity products that contribute to generating the right signals with respect to directions of transmission system development, as well as to minimizing the transmission tariffs. At the same time, they are to provide market participants with the possibility of using the transmission system flexibly by adjusting the booked capacity in the course of the year with products of shorter duration. The level of multipliers is also intended to reflect a possible risk of lost profits from sales of products shorter than one year in tariffs for short-term capacity products.

Adopting too low level of multipliers would result in a decreased tariff for short-term standard capacity products, and this would alter the structure of the capacity contracts portfolio towards the increased share of short-term products. For the Operator, this would mean losing control over the regulated revenue achieved in a given tariff period. Reducing the tariff of short-term contracts to the level of annual contracts would increase the financial risk of the Operator's functioning and could expose it to financial losses.

Considering the need to ensure a balance between facilitating short-term gas trading on the one hand, and ensuring long-term signals for efficient investment in the transmission system on the other, as well as levels of correction factors used in current tariffs under the tariff regulation (until 2019 inclusive - see Table 4), it was decided to accept the value of multipliers from the higher half of the ranges, referred to in Article 13 item 1 of the Tariff Code (as in Table 1).

4.3. Seasonal factors referred to in Article 28 item 1 section b) of the Tariff Code

In order to increase the optimization of the use of the system by generating incentives to use the transmission network in periods of lower demand for capacity, reported by system users, seasonal factors will be applied.

Proposed levels of seasonal factors for particular types of capacity products are shown in Table 2.

Table 2. Seasonal factors proposed for the year 2020.

Month \ Product type	Within-day	Daily	Monthly	Quarterly
October	1.02	1.02	1.02	1.09
November	1.10	1.10	1.10	
December	1.16	1.16	1.16	
January	1.21	1.21	1.21	1.12
February	1.10	1.10	1.10	
March	1.05	1.05	1.05	
April	0.99	0.99	0.99	0.90
May	0.89	0.89	0.89	
June	0.82	0.82	0.82	
July	0.86	0.86	0.86	0.85
August	0.83	0.83	0.83	
September	0.87	0.87	0.87	

The seasonal factors have been calculated in accordance with the methodology set out in Article 15 of the Tariff Code based on gas volumes included in the tariff calculation for 2019 (excluding gas volumes sent to exit points to UGS). The used parameters have been selected in such a way that the product of the multiplier and the corresponding seasonal factor gives a value similar to the correction factors applied so far under the tariff regulation. Detailed calculations are presented in appendices 1-3. In case of quarterly capacity products, the option referred to in Article 15 item 5 section a) subsection (i) of the Tariff Code was adopted (arithmetic mean of individual seasonal factors applied over a period of three months).

Table 3 shows the calculated levels of "correction factors"⁴, which are the product of the above-mentioned multipliers for each capacity product type (Table 1) and seasonal factors (Table 2) defined in the Tariff Code.

⁴ The concept of the "correction factors" is applied in the current tariffs (to 2019 inclusive) determined under the tariff regulation. Referring this concept to the conceptual framework of the Tariff Code, it should be noted that in practice they are also the product of the relevant multipliers and seasonal factors specified in the Tariff Code.

Table 3. Calculated "correction factors" for standard capacity products.

Month \ Product type	Within-day	Daily	Monthly	Quarterly
October	2.24	2.24	1.48	1.39
November	2.42	2.42	1.60	
December	2.55	2.55	1.68	
January	2.66	2.66	1.75	1.42
February	2.42	2.42	1.60	
March	2.31	2.31	1.52	
April	2.18	2.18	1.44	1.14
May	1.96	1.96	1.29	
June	1.80	1.80	1.19	
July	1.89	1.89	1.25	1.08
August	1.83	1.83	1.20	
September	1.91	1.91	1.26	
Average	2.18	2.18	1.44	1.26

Values of correction factors used so far under the tariff regulation are presented in Table 4.

Table 4. Correction factors for standard capacity products from the tariff for 2019.

Month \ Product type	Within-day	Daily	Monthly	Quarterly
October	2.170	2.170	1.4	1.50
November	2.400	2.400	1.6	
December	2.635	2.635	1.7	
January	2.635	2.635	1.7	1.60
February	2.380	2.380	1.7	
March	2.480	2.480	1.6	
April	2.100	2.100	1.4	1.10
May	2.015	2.015	1.3	
June	1.950	1.950	1.3	
July	2.015	2.015	1.3	1.10
August	2.015	2.015	1.3	
September	1.950	1.950	1.3	
Average	2.23	2.23	1.47	1.33

The arithmetic average of the products of the relevant seasonal factor (Table 2) and the multiplier (Table 1), calculated in accordance with Article 13 item 2 of the Tariff Code, falls within the permissible ranges specified in Article 13 item 1 of the Tariff Code.

The adopted multipliers and seasonal factors allow to maintain a balance between the use of short and long-term capacity products by the transmission system users, which positively affects transmission tariffs for all entities using the Polish transmission system, and also gives signals for effective investment in the transmission system. The level of seasonal factors (as in Table 2) was adopted taking into account the need to ensure the economic and efficient use of transmission infrastructure throughout the year and to better reflect costs by transmission tariffs, also bearing in mind the current levels of correction factors adopted in the tariff for 2019 (see Table 4).

The assumption behind the adopted multiplier values and seasonal factors is to incentivize long-term capacity contracts and set tariffs based on booked, invariable during the year, long-term capacities. This is due to the specificity of the transmission system operator's activity, where the transmission of gaseous fuel intensifies during the so-called heating season, while the costs of storage, transmission, network maintenance are borne by the Operator throughout the year. This means that the Operator must have an inflow of funds ensured throughout the year.

A change to the currently applied solution in the field of short-term services would be unfavourable from the point of view of agreements concluded by the Operator regarding the financing of strategic investments and could be a factor giving rise to their renegotiation or termination. It should be noted that the Polish transmission network, requires significant investments in its extension in order to ensure the diversification and security of gas supply.

4.4. Application of multipliers and seasonal factors

The calculated multipliers and seasonal factors will be used at all entry and exit points to/from the gas transmission system, including entry/exit points to underground gas storage, for settlement of services provided on short-term basis.

The charge for short-term gas transmission service will be calculated according to the following formula:

$$Op = Mn * Ws * Ss * Mu * T$$

where:

Op - the charge for a short-term gas transmission service (quarterly, monthly, daily or within-day),

Mn - multiplier,

Ws - seasonal factor,

Ss - transmission tariff, respectively for entry/exit [PLN/MWh/h per h],

Mu - contracted capacity [MWh/h],

T - number of hours in which the short-term service was provided [h].

4.5. The level of discounts at the entry point to the transmission system from LNG installations - Article 28 item 1 section c) and Article 9 item 2 of the Tariff Code

Pursuant to Article 9 item 2 of the Tariff Code at entry points from LNG installations (...) a discount can be applied to capacity-based transmission tariffs in order to increase security of supply.

Analysing the provisions of Article 9 item 2 of the Tariff Code in the context of the Polish natural gas market, it should be noted that this market is part of the group of medium-sized markets with a high degree of dependence on supplies from one direction. Domestic production of natural gas amounts to around 27% of the national balance of natural gas supplies. Until 2017, the main source of gas from abroad, despite the expansion of interconnections on the western and southern border, was the eastern direction. High level of dependence of the Polish market on gas supplies from one direction had a significant impact on the level of gas prices. Therefore, the LNG Terminal as an alternative source of supplies is to support the processes of competition development on the gas market. The launch of the LNG Terminal in Świnoujście created the conditions for entities operating on the global LNG market to enter the Polish gas market. Increased competition on the part of gas suppliers is aimed at improving the negotiating position of gas trading companies in Poland.

In connection with the above, in the case of the entry point to the transmission system from the LNG terminal in Świnoujście, from the start of regasification, that is since June 2016, a discount of 100% has been applied. This solution was introduced mainly for the sake of key importance of the LNG terminal for:

- increasing the security of gas supplies to Poland through the diversification of directions of supplies and ensuring access to the global gas market - fully independent of perturbations on the local and regional market,
- competition development on the domestic gas market through the possibility of obtaining gas by domestic suppliers from a new source.

Pursuant to the provisions of Article 9 item 2 of the Tariff Code (which will be applied as of 31 May 2019) allowing to apply a discount in relation to capacity-based tariffs at entry points from the LNG installations to enhance the security of gas supplies, maintaining a discount of 100% is also planned in the tariff for 2020.

4.6. The level of discounts applied to calculate the reserve prices for standard capacity products for interruptible capacity - Article 28 item 1 section c) and Article 16 of the Tariff Code

Article 16 of the Tariff Code allows to adopt one of two solutions for the calculation of reserve prices for standard capacity products for interruptible capacity. Both solutions provide for the discounting of interruptible services. The difference between the options consists in the moment of granting the discount and the method of its determination. In Article 16 items 1-3, the method based on the *ex-ante* discount was described in detail, and in item 4 rules for granting an *ex-post* discount were set out.

The adoption of the first solution results in the calculation of reserve prices for standard capacity products for interruptible capacity by multiplying the reserve prices of standard capacity products by the difference between 100% and an *ex-ante* discount. This discount must be calculated in accordance with the detailed guidelines contained in the Tariff Code. In its

calculations forecast data regarding amount, duration and frequency of expected capacity interruptions are used.

In order for the forecast of such data to have a reference to the situation in the transmission system, it is necessary to base the analysis on historical data. In addition, such data should present the situation in the system operating in the conditions that are as close as possible - that is, they should not come from a distant time period. In this context it should be noted that in the last three years, no interruptions of interruptible services have been recorded. While using previous data, due to dynamic changes in the transmission system situation, would lead to conclusions that are inadequate to the current state of the transmission network. In connection with the above, using solutions required by the Tariff Code when selecting *an ex-ante* discount would lead to the calculation of a discount at an unreasonable level.

Therefore, it is possible to apply only an *ex-post* discount to interruptible services provided in the national transmission system. Pursuant to Article 16 item 4 of the Tariff Code, it applies when there has been no interruption of capacity in the system due to physical congestion in the previous gas year.

In connection with the above, it is assumed that one methodology based on the application of an *ex-post* discount should be applied to all interconnection points and intrasystem points. Considering the data for previous years, which indicate that the probability of discontinuation of an interruptible service is very small, discounting the reserve prices of standard products for interruptible capacity after a possible interruption of the transmission service seems justified.

Pursuant to Article 16 item 4 of the Tariff Code, this compensation will therefore be equal to three times the reserve price (rate) for daily standard capacity product for firm capacity.

5. Consultations regarding the EuRoPol tariff

5.1. Multipliers referred to in Article 28 item 1 section a) of the Tariff Code

It is proposed to apply multipliers for short-term products, presented in Table 5, in future tariffs (as of 2020). For comparison, in Table 6, values of correction factors of the tariff (reference price) are presented, at the level specified in the tariff approved for 2019. Multipliers proposed in Table 5 are the lowest correction factors values from the tariff for 2019.

It should be emphasized that end users or gas storage facilities are not connected to the EuRoPol transmission network. In terms of capacity covered by the so-called historical contracts, settlements with customers are conducted by EuRoPol, while the remaining ones by the Operator.

Table 5. Multipliers for short-term capacity products adjusting tariffs (reference prices) for entry/exit to/from the EuRoPol transmission network proposed for 2020.

Gas transmission service	Within-day	Daily	Monthly	Quarterly
Multiplier	1.95	1.95	1.30	1.10

The above multipliers fall within the permissible ranges specified in Article 13 item 1 of the Tariff Code.

Table 6. Correction factors adopted for the 2019 tariff .

Month	Correction factors of tariffs (S _s) for entry into or exit from the EuRoPol transmission network for short-term transmission services			
	Within-day	Daily	Monthly	Quarterly
October	2.17	2.17	1.40	1.60
November	2.40	2.40	1.60	
December	2.635	2.635	1.70	
January	2.635	2.635	1.70	1.60
February	2.38	2.38	1.70	
March	2.48	2.48	1.60	
April	2.10	2.10	1.40	1.10
May	2.015	2.015	1.30	
June	1.95	1.95	1.30	
July	2.015	2.015	1.30	1.10
August	2.015	2.015	1.30	
September	1.95	1.95	1.30	

The applied solution, as in the case of the TSO tariff, will ensure a balance between allowing short-term gas trading on the one hand and long-term signals for efficient investing in the transmission system on the other.

5.2. Seasonal factors referred to in Article 28 item 1 section b) and Article 15 of the Tariff Code

In connection with the provisions of Article 13 item 2 of the Tariff Code, it is not foreseen to apply seasonal factors referred to in Article 15 of the Tariff Code.

This approach stems from the relatively stable level of gas flow in the EuRoPol network recorded in individual months of the gas year (deviations of monthly gas flow rates from the all-year average, averaged for years 2015-2017, amounted to only approx. +/- 6%).

5.3. Application of multipliers

Proposed multipliers will be applied at all entry and exit points to/from the gas transmission system owned by EuRoPol for settlement of services provided on short-term basis.

The charge for short-term gas transmission service will be calculated according to the following formula:

$$Op = Mn * Ss * Mu * T$$

where:

Op - the charge for a short-term gas transmission service (quarterly, monthly, daily or within-day),

Mn - multiplier,

Ss - transmission tariff, respectively for entry/exit [PLN/MWh/h per h or PLN/MWh/day per day],

Mu - contracted capacity [MWh/h or MWh/day],

T - number of hours or days in which the short-term service was provided [h or day].

5.4. The level of discounts used to calculate the reserve prices for standard capacity products for interruptible capacity - Article 28 item 1 section c) and Article 16 of the Tariff Code

Analogically as in item 4.6 above, it is assumed that one methodology based on applying an *ex-post* discount, is adopted for the transmission network owned by EuRoPol. Considering the data for previous years, which indicate that the probability of discontinuation of an interruptible service is very small, discounting reserve prices of standard products for interruptible capacity after a possible interruption of the transmission service seems justified.

Pursuant to Article 16 item 4 of the Tariff Code, this compensation will therefore be equal to three times the reserve price (rate) for daily standard capacity product for firm capacity.

Appendices:

Table 1. Calculation of seasonal factors for daily gas transmission services for 2020 (Article 15 of the Tariff Code).

Table 2. Calculation of seasonal factors for monthly gas transmission services for 2020 (Article 15 of the Tariff Code).

Table 3. Calculation of seasonal factors for quarterly gas transmission services for 2020 (Article 15 of the Tariff Code).