

**Dioriga Independent Natural Gas System  
(Dioriga FSRU)**

**MARKET TEST**

**EXPRESSION OF INTEREST PHASE NOTICE  
(October 2021)**

**In accordance with the "Guidelines for management and  
allocation of capacity on the  
Dioriga Independent Natural Gas System (Dioriga FSRU)  
according to paragraph 6 of article 36 of Directive 2009/73/EC"**

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## 1. Introduction

Dioriga Gas S.A. ("**Dioriga Gas**") is a company incorporated under Greek Law with the scope to own and operate natural gas infrastructure. Dioriga Gas develops the Independent Natural Gas System (INGS), "Dioriga Floating Storage Regasification Unit" ("**the Project**").

On July 16<sup>th</sup>, 2021, Dioriga Gas applied to the National Regulatory Authority for Energy of Greece ("**the Authority**") for an exemption under art. 36 of Directive 2009/73/EC ("**the Directive**"). Dioriga Gas formally requested an exemption for a period of 25 years, under arts. 32, 33 and 41(6), (8) and (10) of Directive 2009/73/EC ("the Directive") from:

- Regulated tariffs on the services provided by the Project according to Section 3.2.1.
- Third party access on booking Capacity to the Project.

As required by the Directive (par. 6 of Article 36), Dioriga Gas will perform the EoI phase of the Market Test prior to the Binding phase in order to compile the market's interest into reserving Capacity and other Services in the Project. The EoI phase of the market test, shall commence on the 22<sup>nd</sup> of October 2021. The minimum total duration of the EoI phase has been set to 45 days, as explicitly described in section 6.4.

The principles for capacity allocation to the Project and the main elements of the Market Test process are provided in the "Guidelines for management and allocation of capacity on the 'Dioriga' Independent Natural Gas System (Dioriga FSRU) according to paragraph 6 of article 36 of the Directive 2009/73/EC" ("**the Guidelines**"), under Decision of the Authority No. 700/2021.

According to the Guidelines, Dioriga Gas shall perform the Market Test in two phases, as described below:

- a. The Expression of Interest Phase ("the EoI Phase")** in which all potential Users are invited to express their interest in reserving Capacity in the Project by submitting the set of documents described in section 6 below.
- b. The Bidding Phase**, in which EoI Participants will be asked to submit binding requests for Capacity in the Project in accordance with the Bidding Phase Guidelines, to be approved by the Authority following the conclusion of the EoI Phase. Dioriga Gas will conduct the Capacity allocation and reservation procedure in the Project, in accordance with the Bidding Phase Guidelines.

Through the EoI Notice, Dioriga Gas is initiating the EoI Phase of the Market Test. Through the EoI phase, Dioriga Gas will:

- Canvass the intentions of any party in reserving any of the Project's Services.
- Collect data and information useful to the Authority to assess the criteria set out in art. 36.1 of the Directive.

Capacity and all relevant Services will be allocated in accordance with the Bidding Phase Guidelines, following completion of the Bidding Phase in accordance with Art. 3.5. of the Guidelines. Shareholders of the Project shall participate in the Expression of Interest phase of the market test under the same terms and conditions applicable to other potential network users, as set out in the Expression of Interest Notice.

The participation in such EoI Phase does not constitute a commitment by the EoI Participant

to buy Capacity in the Project, and Dioriga Gas, by conducting such Eol Phase, does not commit to actually invest in and realize the Project. Finally, it is again mentioned, that the participation in the Eol phase is a prerequisite for interested Stakeholders to participate in the Bidding Phase of the Market test.

Concerning the Bidding phase, potential shippers will be requested to apply and subscribe for their preferred services and products in the Dioriga-FSRU, in accordance with the Bidding-phase guidelines.

Dioriga Gas will respect the confidentiality of any information received from the applicants. Non-withstanding the above, Dioriga Gas will release to the Authority all details relevant to the Market Test Eol Phase results. In addition, Dioriga Gas will disclose to the Authority any information and/or data requested by the Authority to complete the assessment of the exemption application submitted by Dioriga Gas.

Summarizing, the purpose of this Eol Notice is to provide general information on the Project and the projected available services to the Eol Participants and to set out the conditions for registration and participation in the Eol Phase.

## 2. Definitions

This Eol Notice uses the definitions of Art.1 of the Guidelines. In addition, terms are defined either directly in the Eol Notice, or herein below:

**Credit Rating** shall mean a credit rating attributed to the Eol Participant, provided by a primary international rating agency, at least equivalent to Baa3 (as per Moody's Investor Services rating rank) or BBB- (as per Standard & Poor's Corporation rating rank);

**Expression of Interest Deadline or Eol Deadline** shall mean 10th of December 2021, by which the Expression of Interest Form (Eol Form) in Exhibit II shall be submitted to be considered valid;

**Expression of Interest Notice or Eol Notice** shall mean this notice;

**FSRU** shall mean the LNG floating storage and regasification unit, to be located approximately 5km SW of the settlement of Agioi Theodoroi, near the Corinth Canal, in Central Greece. The FSRU is an integral part of the Project;

**Eol Notice Form or Form** shall mean the attached in Exhibit II form to be filled by any party interested in participating in the Eol phase;

**LNG** shall mean the liquefied natural gas;

**Product(s) or Service(s)** shall mean the products/services offered by Dioriga Gas that are available for reservation on behalf of any interested party;

**Sponsor(s)** shall mean the shareholders of Dioriga Gas S.A.;

**TSO** shall mean Transmission System Operator;

**User (or Users)** shall mean a Stakeholder that reserves Capacity in the Project, in the Bidding Phase.

### 3. Technical Description of the Project

The Project includes the construction of an FSRU (Floating Storage Regasification Unit) jetty in Ag. Theodoroi in Corinth, Greece. The new anchorage will be built in a position south of the existing refinery of MOH and at least 300m from the refinery. The FSRU docking position will be 150m from the coastline, at depths of up to 25m (MSL).

More specifically, the new facility is located:

- at a distance of about 1.5km W of the existing MOH port facilities and at a distance of about 5km east of the Isthmus of Corinth
- at a distance of about 5km SW of the settlement of Ag. Theodoroi
- at a distance of about 4.5km north of the designated Aquaculture Zone (West Saronic Bay - No. A7 Government Gazette 2505B/4-11-2011).



*Figure 1 Dioriga FSRU Location*

The Project comprises of:

- An FSRU which will serve for the reception, storage and regasification of Liquefied Natural Gas (LNG) that will be transported to the floating unit from LNG-Carriers (LNGC) of maximum capacity of 266,000 m<sup>3</sup> LNG. LNGC shall be moored side by side to the FSRU in order to transfer LNG (Ship to Ship) via flexible hoses to FSRU storage tanks.
- A jetty/trestle, including a central platform, breasting and mooring dolphins for the permanent berthing of the FSRU. In the jetty, Ship to Shore gas loading arm(s), a jetty-borne gas pipeline (20 inch) and other auxiliary systems shall be installed that will serve the safe transfer of NG to onshore installations.
- Onshore Installations include a High-Pressure NG pipeline (20 inch) and a Metering Station for the conveyance of the exported NG to the National Natural Gas Transmission System (NNGTS).

The foreseen jetty infrastructure works include the following:

- A Utility platform of typical dimensions 15m x 20m



#### **4. Project Status and Timeline**

Dioriga Gas has been working towards the development of the technical and commercial aspects of the Project, formally since 2016. Currently the Project is at a relatively mature level and Dioriga Gas is working towards the finalization of the commercial design.

On 20 December 2018, with its Decision No. 1321/2018, RAE granted to Dioriga Gas S.A. a license for an Independent Natural Gas System (INGGS License). The license is provided according to the provisions of Greek Energy Law (Articles 2 and 74) and the Regulation for Natural Gas Licenses (FEK B' 3430/17.08.2018). The license was granted in response to the relevant application submitted by Dioriga Gas S.A. submitted to RAE on 14 March 2017.

On 20 June 2019, Dioriga Gas S.A. submitted to DESFA S.A. a request for Advanced Reservation of Capacity at a new exit point to be constructed by DESFA at the vicinity of the Project. A Project Evaluation Study, carried out by DESFA, was concluded in August 2020.

The Project was included by DESFA in the 2021-2030 Ten Year Network Development plan as approved by RAE on 8 January 2021 (GG B' 1392/8.4.2021). Dioriga Gas is currently working thoroughly on preparing the relevant documentation for Installation license, including:

- Environmental terms
- Topographic study
- Opinion of services or bodies if required in the specific area or for specific activity
- Right to access to shore
- Right to access to seabed and sea area
- Safety study SEVESO III
- Installation Act
- Architecture study

In February 2021, Dioriga Gas submitted to RAE an application for amendment of its INGS License regarding technical characteristics and shareholding structure. On 29 April 2021, with its Decision No. 386/2021, RAE granted Dioriga Gas to proceed with the submitted amendments. The amended INGS License, submitted by Dioriga Gas to RAE on 16 July 2021, is currently awaiting for approval by RAE.

On June 16th 2021 the Advanced Reservation of Capacity Agreement (ARCA) for the construction of the connections between the Project and the National Natural Gas Transmission System (NNGTS) was co-signed by Dioriga Gas and DESFA.

Dioriga Gas S.A. has initiated its Front-End Engineering Design (FEED) which is expected to be concluded by Q4-2021 and aims to obtain all required licenses by Q2-2022 as shown in the Figure 3.

The construction of the Project is expected to begin in Q3 of 2022 and the Commissioning Operation Date is planned for Q4 of 2023.

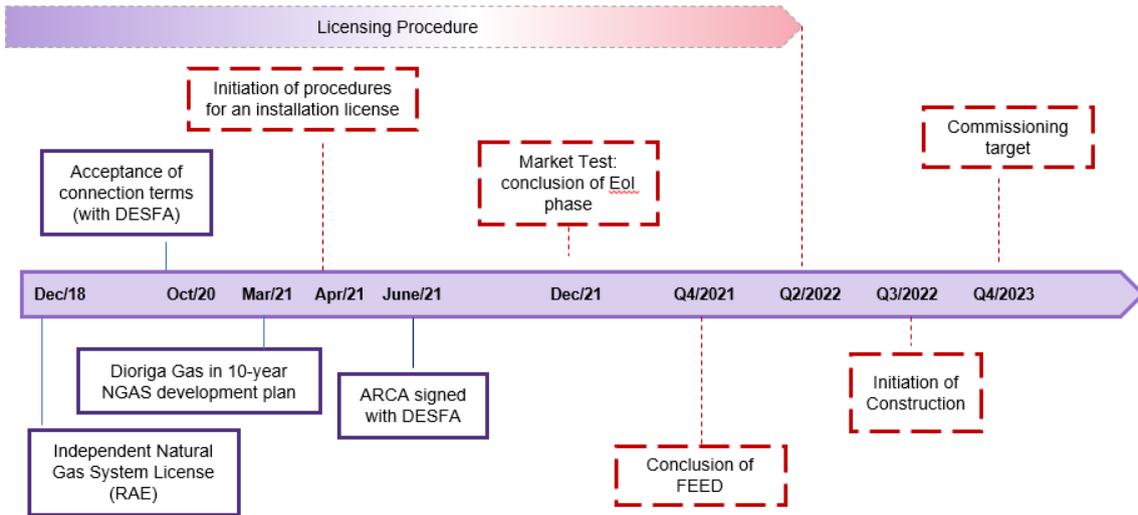


Figure 3 Indicative High-Level Project Timeline. The timeline shows indicative timestamps for the conclusion of selected milestones. Several other parallel actions (not shown) are also anticipated.

## 5. Offered Services and Tariff Determination Principles

Products have been purposely conceived so as to accommodate demand for typical LNG services (e.g., bundled slots) and in addition ensure flexibility through the provision of additional regassification capacity and/or storage as well as a variety of short-term services.

In addition to LNG regassification services as outlined above, Dioriga shall be offering a wide range of small-scale LNG (ssLNG) services purposely designed to serve its Users in addressing evolving market requirements due to the European and national decarbonisation commitments and also the EU Smart Mobility Strategy which aims to expand the usage of lower carbon fuels to road and sea transport. The ssLNG services of Dioriga can well contribute in this direction. The Dioriga Gas FSRU will provide a number of products/services as shown below.

- **Product A (Bundled Service)**

The Bundled Service includes berthing, unloading, temporary storage, and uniform send-out/regasification of LNG into the NNGTS with a maximum of 20 days of storage (subject to Terminal Inter-Customer Agreement).

Contract Duration: equal or greater than one year and up to 25 years

Short Term Offerings (Spot): Non-allocated slots may be provided on a cargo-by-cargo basis. Temporary storage duration shall be of a maximum of 20 days (subject to Terminal Inter-Customer Agreement). Actual allocating mechanism shall be defined by Dioriga Gas S.A. in the Dioriga FSRU Code of Operations to be prepared at least 1 year prior to commercial operation. The Dioriga FSRU Code shall be placed into public consultation.

- **Product B (Unbundled Services)**

The Unbundled Services include access to additional regasification capacity or additional storage in the FSRU tanks.

Contract Duration: equal or greater than one year and up to 25 years

Short Term Offerings: Non-allocated regasification capacity and temporary storage may be offered for short term (multiples of a day). Actual allocating mechanism shall be defined in the Dioriga FSRU Code of Operations. Minimum subscription for regasification capacity or storage shall be equal to 1 day.

- **Product C (small scale LNG services-ssLNG)**

Dioriga shall be providing at least two types of services under this Product.

- **LNG Bulk-breaking Service**

The service includes berthing of a small-scale vessel alongside the FSRU with a maximum 18 hours slot for reloading operations. Envisaged maximum cargo size: 10,000 m<sup>3</sup>.

Contract Duration equal or greater than one year and up to 25 years

- **LNG Bunkering Service**

The service includes berthing of a small-scale vessel/bunkering barge alongside FSRU with a maximum 12 hours slot for reloading operations. Maximum cargo size: 5,000 m<sup>3</sup>.

Contract Duration: equal or greater than one year and up to 25 years

Short Term Offerings: Non-allocated products of this type shall be offered on a short-term basis. Actual allocating mechanism shall be defined in the Dioriga FSRU Code of Operations.

- **Product D (TLT)**

The Truck loading Service includes loading LNG into LNG trucks capable of carrying LNG via road to the end-customers. Each truck is expected to carry nearly 274 MWh of LNG.

Contract Duration: equal or greater than one year and up to 25 years

Short Term Offerings: Non-allocated products of this type shall be offered on a short-term basis. Actual allocating mechanism shall be defined in the Dioriga FSRU Code of Operations.

Tariff calculation principles and methodology will be defined by the Bidding Phase Guidelines. However, it is currently envisaged that the tariffs will be set in order to secure the Project's financial viability and Sponsors' targeted profitability. Tariffs applied to users will be cost reflective and non-discriminatory.

## **6. Participation in the Eol Phase**

### **6.1 Eligibility**

In the Eol Phase all potential users, including shippers, DESFA and other TSOs and/or infrastructure operators, are invited to express their interest, pursuant to the Guidelines for management and allocation of capacity on the “Dioriga” Independent Natural Gas System, in contracting capacity in the Project and are asked to submit data and information in order for the Authority to assess the criteria set out in Article 36 (1) of the Directive.

The Eol Phase neither binds Eol Participants to book the capacity for which they have expressed their interest in, nor does it bind DIORIGA GAS to offer such capacity. However, participation in the Eol Phase is a prerequisite for subsequent participation in the Bidding Phase. This restriction may only be waived prior to the Binding phase if Dioriga Gas finds it suitable, but only under RAE’s approval.

### **6.2 Application Procedure**

Entities interested in this Eol Phase are requested to deliver the attached Exhibit II Form, duly completed and signed, together with the following mandatory supporting documentation, by no later than the Expression of Interest Deadline, by courier or registered mail, to the address of Dioriga Gas, specified in paragraph 6.2.2 of this Eol Notice.

The mandatory supporting documents required to be attached along with the Eol Participant’s Form are:

- Declaration that no person employed at senior management level in the Eol Participant’s company or representing that company has been convicted for being a member of a criminal organization or has been convicted for fraud, corruption or money laundering;
- Declaration that the Eol Participant is not bankrupt or is under a procedure of any form of insolvency;
- Attested affidavit by the legal representative or the authorized representative of the Eol Participant;
- Certified copy of a certificate of current corporate registration issued no more than 3 months prior to the Eol Deadline;
- Audited financial statements of the three most recent completed financial years of the Eol Participant (or the shareholders of that Eol Participant if such audited financial statements cannot be produced for the last three financial years);
- Credit Rating/evidence of creditworthiness as defined in section 2. If the Eol Participant has no Credit Rating or does not have the minimum credit rating, it shall indicate how it intends to prove comparable creditworthiness (such as through Parent/Sovereign/State Guarantee, letter of Credit or other);

All documents are to be in English and duly signed by an authorized representative of the Eol Participant. Proof of power to sign shall be included in the documentation.

Within 5 (five) Days from the Eol Deadline, Dioriga Gas will deliver to the Authority the report summarizing the results of the Eol Phase in accordance with art. 7 of the Guidelines.

Dioriga Gas shall communicate to each Participant, the expressions of interest submitted by

product in an aggregate form. This communication shall take place at the latest within 10 (ten) business days from the EoI Deadline.

### **6.2.1 Requests for Clarifications**

Within and not later than 2 weeks from the publication of this EoI Notice, requests for clarification exclusively regarding the participation to the EoI Phase, can be addressed to the following email address:

[info@dioriga.gr](mailto:info@dioriga.gr)

### **6.2.2 Submission of Applications**

All documents and declarations to be submitted to Dioriga Gas under this Market Test shall be made to the following email address:

[info@dioriga.gr](mailto:info@dioriga.gr)

## **6.3 Exclusion Criteria**

An EoI Participant may be excluded from the Market Test if one or more of the following occurs:

- i. Part of the requested documentation is missing or incomplete or not signed by an authorized signatory or delivered after the EoI deadline;
- ii. Mandatory documentation has not been received in its proper form by Dioriga Gas on time or at all;
- iii. The authorized signatory has been convicted for being a member of a criminal organization or has been convicted for fraud, corruption or money laundering.
- iv. The company has been declared bankrupt or is under a procedure of any form of insolvency.

## 6.4 Eol Timeline

*Table 1: Indicative Timeline of the Expression of Interest phase*

Stage	Deadline
Start of Eol Phase	October 22 <sup>nd</sup> , 2021
Deadline of Request for Clarifications	November 5 <sup>th</sup> , 2021
Expression of Interest Deadline	December 10 <sup>th</sup> , 2021
Summary of results evaluation by Dioriga Gas to Authorities (In accordance with Article 7 of the Guidelines)	December 15 <sup>th</sup> , 2021
Dioriga Gas informs participants	December 24 <sup>th</sup> , 2021

## 6.5 Participation Fee

No participation fee is required for the Eol phase of the market test.

## 7. Confidentiality

Dioriga Gas on one side, and each Eol Participant on the other (for the purposes of this Eol Notice jointly referred to as "**the Parties**") shall treat confidentially all documents and information that they obtain or exchange from each other in connection with this Market Test (hereinafter, "**the Confidential Information**") and, unless otherwise stated herein, shall not disclose such Confidential Information or make it accessible to third parties without the prior written consent of the Party affected. The Parties undertake to use the confidential Information obtained exclusively for the purposes of the Market Test, in accordance with the principles contained in the Eol Notice.

Either Party shall be entitled to disclose without the written consent of the other Party any Confidential Information obtained from the other Party:

- i. to the Authority or any other competent authority for the purposes of the evaluation of the Dioriga Gas exemption application;
- ii. to its representatives, consultants, banks and insurers if and to the extent that disclosure is needed for proper performance of its obligations under this Market Test;
- iii. to the extent that the confidential information was legitimately known to the Party receiving the information at the time it:
  - a. was obtained from the other Party, or
  - b. was already in the public domain or becomes publicly available other than through an act or omission of the receiving Party, or

- c. must be disclosed by a Party due to a statutory provision or a court or official order or a request of the regulatory authorities; in any such case, the disclosing Party shall inform the other Party thereof without undue delay.

The confidentiality obligations of the Parties shall commence upon receipt by Dioriga Gas of the Eol documentation and for 3 years after the completion of the Market Test.

## **8. Suspension and Termination of the Market Test Procedure**

Dioriga Gas shall have the right to suspend and/or terminate the Market Test at any time, by giving notice to the Eol Participants and to the Authority, as the case may be, by courier or registered mail. In case of suspension, notice of cessation of the suspension must be given in the same forms.

## **9. Liability**

No Party shall be liable to the other Parties for any damage arising out of or in connection with this Eol Phase unless such damage is the result of a wilful act or omission, or arises from the gross negligence, of the Party concerned.

## **10. Assignment**

The Eol Participant shall have the right to assign to third parties any of its rights or obligations in connection with the Eol phase of the Market Test, whether in whole or in part.

## **Attachments**

Exhibit I: Guidelines

Exhibit II: Eol Form