

## Gas Natural comments to ERGEG Public Consultation on 2010 Work Programme

---

Gas Natural welcomes the opportunity to provide input to the ERGEG's 2010 Work Programme.

### **1 How do you assess our general approach and objectives? Do you have any specific comments on any of the individual deliverables?**

Even though Gas Natural shares ERGEG's general approach and objectives we propose the following amendments:

- In **section 3.2.2.** the following **bullet point** should be incorporated:

*“ERGEG Status Review on regional gas interconnections management and use”*

- Recent gas crisis has shown that the main problem was not the lack of gas itself but the lack of interconnection and reverse flows among Member States. A study should be carried out in order to analyze the current situation, the investment plans and the main barriers to develop new capacities.

- In **section 3.2.2.** the bullet point regarding **“ERGEG Status Review of intra and inter-regional coordination of open seasons”** should be **strengthened in order to include the recent Open Season of Spain France interconnection.**

- This consultation was launched without including the Open Season of Spain-France Interconnection as it was not finish at that time. *We consider ERGEG should include it as we believe it represents a valuable and recent example that can provide great inputs in order to improve further OS.*

- In **section 3.2.2.** the following **deliverable** should be required in order to reach the objectives proposed:

*“Status review of access regime to storage and its impact in the developpement of new storage facilities. The study should also analyze administrative storage concession process”.*

- *The current main problem regarding storage is the lack of capacity. Regulators should deeply analyze the reasons that can explain it in order to find solutions promoting the development of new facilities.*

- In section 3.3.2 the bullet point regarding the “**Status Review on the ERGEG Regional Initiatives**” should be strengthened by including *a detailed list of goals that have or have not been reached in each of the Regions*