

## **EREGEG Gas Focus Group/Storage TF**

### **Guidelines for Good Practice for Gas Storage System Operators (GGPSSO)**

#### **Questionnaire for SSOs**

##### **Introduction**

The objective of this questionnaire is to collect information from SSOs to assist in monitoring the implementation of the GGPSSO as requested by the European Commission.

The GGPSSO set out the minimum requirements for the provision of fair and non-discriminatory access to gas storage (in accordance to the Gas Directive<sup>1</sup>). Monitoring implementation of the GGPSSO is therefore important in understanding how access to gas storage is being provided.

Not all requirements under the GGPSSO are due to be implemented from 1 April 2005 – however it will be important to understand what progress SSOs are making towards implementing these later requirements.

The deadline for the completion of the questionnaire is **20 June 2005**.

If there are late or incomplete submissions after date they will be considered as “nil” returns. SSOs are required to indicate the date from which GGPSSO requirements were met –particularly where this after 1 April 2005.

In order to ensure that all interested parties are consulted, ERGEG will also send out questionnaires to national regulatory authorities and storage users. The view of storage users will be particularly important in assessing implementation of the GGPSSO.

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<sup>1</sup> Directive 2003/55/EC of the European Parliament and of the Council concerning common rules for the internal market in natural gas and repealing Directive 98/30/EC

EREG intends to publish an initial report on the implementation of the GGPSSO in September 2005 and it expects to present these findings at the next Madrid Forum. ERGEG intends to issue a final report on implementation after it has an opportunity to consider responses to its initial report.

**To help ensure transparency, responses to the questionnaire and other documents associated with the GGPSSO will be published on the ERGEG website. Any requests to keep information confidential will be considered in accordance with the relevant section of the GGPSSO that deals with the publication of the information. If you want any information to be treated as confidential this should be objectively justified and outlined clearly – taking into account the requirements of the GGPSSO. Any information that is to be treated as confidential should be placed in a separate appendix.**

Please note that in order to allow for maximum common understanding of data, the answers provided by SSOs will be reviewed by the national regulatory authority.

Given that ERGEG's initial report will be published in September, we request that SSOs provide an addendum to their original submission if there are significant changes to the information that they provide, between 20 June and the beginning of September (1 September). This will ensure that the report is as up to date as possible and avoid misrepresenting the position of the SSOs.

Any question on this questionnaire should be directed in the first instance to:

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## Questionnaire

### 1 General

1.1 Business name of respondent: **Gaz de France (stockage)**

1.2 Is access to your storage system provided:

(a) on a regulated basis	<input type="checkbox"/>
(b) on a negotiated basis	<input checked="" type="checkbox"/>
(c) both ( <i>please provide comments below</i> )	<input type="checkbox"/>
notes:	

1.3 Is access provided:

(a) to a given storage facility	<input type="checkbox"/>
(b) to a group of storage facilities in the same balancing zone	<input checked="" type="checkbox"/>
(c) other ( <i>please provide comments below</i> )	<input type="checkbox"/>
notes:	

*if you answer that access is provided to a given storage facility/to a group of storage, please assume that all following answers will be interpreted accordingly*

1.4 If access to storage is not provided to individual storage facilities, please provide details (e.g. how many groups, how many sites within group) and specify how this is arranged:

answer:

Gaz de France offre un accès aux six groupements de stockage suivants: Picardie (composé d'un site de stockage), Lorraine (composé d'un site de stockage), Ile de France Nord (composé de deux sites de stockage), Ile de France Sud (composé de trois sites de stockage), Centre (composé de trois sites de stockage), Salins Sud (composé de deux sites de stockage).

1.5 How many system users own capacity rights (date of reference: 1 April 2005)?

answer: cette information n'étant pas demandée par les GGPSSO et relevant d'un domaine commercialement sensible, Gaz de France ne souhaite pas qu'elle soit rendue publique. L'information est fournie de façon confidentielle à la CRE, en annexe, même si cette dernière en dispose déjà puisqu'elle détient une copie de tous les contrats de stockage.

1.6 National framework:

(a) do you believe that there is a conflict between the requirements of the GGPSSO and national legislation that will materially affect either your interests or your ability to comply with the GGPSSO?	<input type="checkbox"/>
(b) if "yes", did you notify your relevant national regulatory authority (GGPSSO Scope and Objective)?	<input type="checkbox"/>

## 2 Roles and responsibilities of Storage System Operators

### 2.1 Please specify if you are (GGPSSO 1.1):

(a) a separate entity (i.e. ownership unbundling)	<input type="checkbox"/>
(b) a separate entity (i.e. legal unbundling)	<input type="checkbox"/>
(c) part of a “combined operator” (i.e. combined transmission, LNG, storage and distribution storage operator, legally unbundled from other activities not relating to transmission, LNG, storage and distribution system operations)	<input type="checkbox"/>
(d) part of a vertically integrated company (i.e. unbundling of accounts)	<input checked="" type="checkbox"/>

### 2.2 In the case of a SSO being part of a vertically integrated company:

(a) please provide details on the ownership structure. If an ownership diagram is available, please attach it to the completed questionnaire.	
details: le capital de Gaz de France SA, jusqu'ici détenu à 100% par l'État français devrait être ouvert à hauteur de 20 à 25% avant fin juin 2005.	
(b) please specify if you have drawn up a document setting out all the terms and conditions relating to storage use by the affiliate company (GGPSSO 1.3).	<input checked="" type="checkbox"/>

### 2.3 Please specify if you (GGPSSO 1.2.b):

(a) have developed and use standard storage contracts	
(b) have developed and use a storage code (approved by national relevant regulatory authority)	<input type="checkbox"/>
(c) consulted users in developing the standard storage contracts or the storage code	<input checked="" type="checkbox"/>

### 2.4 Please provide details on how the consultation process for developing standard storage contracts/storage code was conducted (relating to GGPSSO 1.2.b)

(a) bilateral contacts with some users	<input type="checkbox"/>
(b) bilateral contacts with all users and some prospects	<input checked="" type="checkbox"/>
(c) open consultation process, with some sort of public announcement (e.g. on company website, by press, at a conference)	<input type="checkbox"/>
(d) consultation process supervised by relevant national regulatory authority	<input type="checkbox"/>
(e) other ( <i>please specify below</i> )	<input checked="" type="checkbox"/>
<p>Gaz de France a publié l'offre d'accès au stockage en avril 2004, avant l'échéance fixée par la Directive européenne 2003/55/EC.</p> <p>L'évolution des offres s'est effectuée suite à une consultation publique de la CRE et après consultation des clients et des principaux prospects.</p>	

### 3 Necessary TPA services

#### 3.1 Please provide the following data in normalised cubic meters (date of reference: 1 April 2005) (GGPSSO 3.1)

	Space	Injectability	Deliverability
(a) technical capacity	8810 Mm <sup>3</sup> (n)	104 Mm <sup>3</sup> (n)/j	194 Mm <sup>3</sup> (n)/j
(b) available capacity	0	1 Mm <sup>3</sup> /j	0
(c) contracted or held capacity	8810 Mm <sup>3</sup> (n)	103 Mm <sup>3</sup> (n)/j	194 Mm <sup>3</sup> (n)/j
(d) any storage capacity not available to TPA on the grounds of article 2(9) of the Gas Directive, with substantiated reasons <sup>2</sup>	172 Mm <sup>3</sup> (n)	3,9 Mm <sup>3</sup> (n) <sup>3</sup> /j	17,2 Mm <sup>3</sup> (n)/j
notes: (d) concerne exclusivement les capacités réservées au transporteur			
(e) any other capacity excluded from TPA – other than the portion used for production operations and facilities reserved exclusively for the TSO	0	0	0
notes: (a) Les capacités techniques n'incluent pas les capacités souscrites par le transporteur. (a), (b), (c) : toutes offres confondues.			

#### 3.2 Please indicate if Public Service Obligations (PSO) in your country are placed on (relating to GGPSSO 3.2, 3.5, 3.6-3-15):

(a) the SSO	<input type="checkbox"/>
(b) the shippers	<input checked="" type="checkbox"/>
(c) no PSO	<input type="checkbox"/>
(d) other	<input checked="" type="checkbox"/>
(d) concerne les seuls opérateurs de transport.	

(a) : Gaz de France ne considère pas que les Obligations de Service Public des SSOs, telles que décrites dans le décret n°2004-251 du 19 mars 2004 relatif aux obligations de service public (comprenant essentiellement une obligation d'information de la part des stockeurs), relèvent des articles 3.2, 3.5, 3.6.

#### 3.3 Capacity for Public Service Obligations (hereafter PSO):

(a) is storage capacity needed for any PSO offered on a TPA basis? (GGPSSO 3.2)	<input checked="" type="checkbox"/> pour les fournisseurs
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Le niveau des obligations n'est pas fixé dans la loi française (cf. article 39 de la loi du 9 août 2004, relatif à l'article 30-2 de la loi 2003-8 du 3 janvier 2003) et pourrait être précisé par décret.

#### 3.4 If any capacity needed for any PSO is NOT offered on a TPA basis, please state why:

(a) national legislation (pour les opérateurs de transport)	<input checked="" type="checkbox"/>
(b) other	<input type="checkbox"/>
notes:	

<sup>2</sup> Storage facility means a facility used for the stocking of natural gas and owned and/or operated by a natural gas undertaking, including the part of LNG facilities used for storage but excluding the portion used for production operations, and excluding facilities reserved exclusively for transmission system operators in carrying out their functions

**3.5 Please provide the following data in normalised cubic meters for PSO, where NOT offered on a TPA basis (date of reference: 1 April 2005)**

	<i>Space</i>	<i>Injectability</i>	<i>Deliverability</i>
(a) normalised cubic meters	172 Mm <sup>3</sup> (n)	3,9 Mm <sup>3</sup> (n)/j	17,2 Mm <sup>3</sup> (n)/j

**3.6 Do you offer the following services on the primary market (GGPSSO 3.3, 3.5, 3.7):**

(a) bundled services (SBU) of space and injectability/deliverability	<input checked="" type="checkbox"/>
(b) a service which includes an obligation for the SSO to allocate the gas which has been nominated	<input checked="" type="checkbox"/>
(c) injection and withdrawal are possible at any time	<input checked="" type="checkbox"/>
notes:	

**3.7 Are the following services separately charged (GGPSSO 3.3., 3.5, 3.7)?**

(a) a service which includes an obligation for the SSO to allocate the gas which has been nominated	<input type="checkbox"/>
(b) injection and withdrawal are possible at any time	<input type="checkbox"/>
notes: (b) dans le cadre d'un crédit annuel de changements de sens gratuits.	

**3.8 Where some services have NOT been introduced, please state why (GGPSSO 3.4.b, 3.5, 3.6, 3.7):**

Obligation for the SSO to allocate according to nominations	
(a) consistent with the use of the interconnected gas transmission system	<input type="checkbox"/>
(b) not compatible with the balancing regime of the interconnected gas transportation system	<input type="checkbox"/>
Injection and withdrawal possible at any time	
(c) storage technical constraints	<input type="checkbox"/>
(d) economically use of the storage infrastructure	<input type="checkbox"/>
(e) consistent with the use of the interconnected gas transmission system	<input type="checkbox"/>
(f) not consistent with PSOs	<input type="checkbox"/>

**3.9 If any of these services (please specify) has not been introduced for any other reason, please explain why**

explanation:
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**3.10 Where there are limitations on the offer of services on the ground of either storage technical constraints or the economically efficient use of the storage infrastructure:**

(a) was it made public and substantiated (GGPSSO 3.4.b)?	<input type="checkbox"/>
reasons for limitations:	

**3.11 Please indicate if services offered have been developed with consultation of storage users to take into account market demand. If “yes”, please provide details on how the consultation process was conducted (GGPSSO 3.4.a)**

(a) bilateral contacts with some users	<input type="checkbox"/>
(b) bilateral contacts with all users and some prospects	<input checked="" type="checkbox"/>
(c) open consultation process, with some sort of public announcement (e.g. on company website, by press, at a conference)	<input type="checkbox"/>
(d) consultation process supervised by relevant national regulatory authority	<input type="checkbox"/>
(e) other ( <i>please specify below</i> )	<input checked="" type="checkbox"/>
<p>Gaz de France a publié l'offre d'accès au stockage en avril 2004, avant l'échéance fixée par la Directive européenne 2003/55/EC.</p> <p>L'évolution des offres s'est effectuée suite à une consultation publique de la CRE et après consultation des clients et des principaux prospects.</p>	

**3.12 Please specify the minimum size for each service (GGPSSO 3.8)**

	<i>Space</i>	<i>Injectability</i>	<i>Deliverability</i>
(a) bundled services (SBU) of space and injectability/deliverability	<i>Pas de limites</i>	<i>Pas de limites</i>	<i>Pas de limites</i>
(b) injection and withdrawal are possible at any time	<i>Pas de limites</i>	<i>Pas de limites</i>	<i>Pas de limites</i>

**3.13 Are storage users allowed to pool their nominations with a view to overcome potential capacity thresholds (GGPSSO 3.8)?**

Answer (dans l'hypothèse où la question aurait un sens pour l'offre de Gaz de France-voir réponse ci-dessus):	<input checked="" type="checkbox"/>
notes:.	

**3.14 Please specify the maximum duration for each service offered by your SSO (GGPSSO 3.3.c)**

(a) bundled services (SBU) of space and injectability/deliverability	<i>Pas de limites</i>
(b) other services	<i>Pas de limites</i>
notes:	

**3.15 Please specify if you have developed information systems and electronic communications to provide adequate data to storage users and to simplify transactions such as:**

	<i>Email</i>	<i>Internet</i>	<i>Other</i>
(a) nominations	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(b) capacity bookings	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(c) transfers of capacity rights between storage users	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(d) other (informations contractuelles, données clients, maintenance,...)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**4 Storage capacity allocation and congestion management**

**4.1 What kind of capacity allocation mechanism do you apply (several answers possible, if mechanism applied different, depending on the storage facility/group of storage facilities)? (GGPSSO 4.1)**

(a) market-based (e.g. auctions)	<input type="checkbox"/>
(b) first come first served	<input checked="" type="checkbox"/>
(c) capacity follows the customer	<input checked="" type="checkbox"/>
(d) other ( <i>please specify below</i> )	<input type="checkbox"/>
notes: (a) Gaz de France estime que le système d'allocation proposé relève d'un système de marché, même s'il n'est pas basé sur des enchères. (b) la réponse s'entend "premier engagé, premier servi" et non pas « premier arrivé premier servi ».	

**4.2 Is the capacity allocation mechanism designed:**

(a) by the SSO	<input checked="" type="checkbox"/>
(b) by national legislation	<input checked="" type="checkbox"/>
(c) other ( <i>please specify below</i> )	<input type="checkbox"/>
notes: le mécanisme d'allocation de capacité et de traitement des congestions commerciales doit être publié sous forme de décret d'application de la loi du 9 août 2004. Dans l'attente, Gaz de France a publié des principes provisoires d'allocation.	

**4.3 Have these mechanisms and procedures been subject to consultation with storage users. If "yes", please provide details on how the consultation process was conducted (GGPSSO 4.1.e)**

(a) bilateral contacts with some users	<input type="checkbox"/>
(b) bilateral contacts with all users and some prospects	<input checked="" type="checkbox"/>
(c) open consultation process, with some sort of public announcement (e.g. on company website, by press, at a conference)	<input type="checkbox"/>
(d) consultation process supervised by relevant national authority	<input type="checkbox"/>
(e) other ( <i>please specify below</i> )	<input checked="" type="checkbox"/>
notes: (e) les autorités de régulation ont été tenues informées sur ces aspects.	



**4.4 In case of congestion, what kind of solution do you apply or plan to apply (GGPSSO 4.2)**

(a) market based (e.g. auctions)	<input type="checkbox"/>
(b) pro rata	<input checked="" type="checkbox"/>
(c) other ( <i>please specify below</i> )	<input checked="" type="checkbox"/>
(b) concerne les congestions commerciales.	
(c) conformément à la loi française ( <i>cf.</i> article 38 de la loi du 9 août 2004, relatif à l'article 30-1 de la loi 2003-8 du 3 janvier 2003), des règles de priorité, fonction du type de consommateur final, sont applicables en cas de congestion commerciale.	

**4.5 Is the congestion management mechanism designed:**

(a) by the SSO	<input checked="" type="checkbox"/>
(b) by national legislation	<input checked="" type="checkbox"/>
(c) other ( <i>please specify below</i> )	<input type="checkbox"/>
notes: le mécanisme d'allocation de capacité et de traitement des congestions commerciales doit être publié sous forme de décret d'application de la loi du 9 août 2004. Dans l'attente, Gaz de France a décrit le traitement des congestions techniques.	

**4.6 The congestion management mechanism:**

(a) has it ever been used?	<input checked="" type="checkbox"/>
notes: Gaz de France a déjà appliqué ses règles de traitement des congestions en cas de congestion technique (incident technique par exemple). Il n'a en revanche jamais eu à traiter le cas de congestion commerciale (pénurie de capacité disponible).	

**4.7 Unused capacity (e.g. day-ahead release of non-nominated injectability and deliverability) (GGPSSO 4.4):**

(a) do you offer all unused capacity on an interruptible basis?	<input type="checkbox"/>
Le développement de ce type de services est à l'étude. Les capacités réservées non nominées seront commercialisées, sur une base interruptible, avant le 1 <sup>er</sup> avril 2006.	

**4.8 Do you use other means to discourage hoarding and facilitate re-utilisation and trade of storage capacity? Please specify the nature of these arrangements**

answer :  Gaz de France propose un espace Internet destiné à afficher les demandes relatives aux achats/vente de capacité entre clients stockage.  La règle d'allocation publiée par Gaz de France définit des droits à stockage en fonction des besoins des fournisseurs alimentant directement ou indirectement les clients finaux, classés selon une typologie donnée. Ce mécanisme évite donc qu'un fournisseur bloque de la capacité au-delà de ses droits et contribue à empêcher la réservation abusive de capacité.	<input checked="" type="checkbox"/>
notes: nous n'avons pas eu à résoudre de problèmes relatifs au hoarding de capacité.	

## 5 Confidentiality requirements

### 5.1 Please indicate if you (GGPSSO 5.1.a-c):

(a) keep databases related to storage operations separate	<input checked="" type="checkbox"/>
(b) develop new IT systems for the storage business separately (when new IT systems are being developed in vertically integrated undertakings)	<input checked="" type="checkbox"/>
(c) ensure that no information available to the SSO concerning its storage business is passed to any other part of any affiliate of the company in advance of being provided to all market participants	<input checked="" type="checkbox"/>
(d) have drafted a code of conduct	<input checked="" type="checkbox"/>
(e) have implemented a compliance programme, supervised by a Compliance Officer	<input checked="" type="checkbox"/>

### 5.2 If these measures have been monitored or supervised externally, please specify by whom (relating to 5.1.a-c)

(a) national regulatory authority	<input type="checkbox"/>
(b) another relevant national regulatory authority (please specify)	<input type="checkbox"/>
(c) external audit	<input type="checkbox"/>
(d) other ( <i>please specify below</i> )	<input checked="" type="checkbox"/>
notes: les mesures relatives au respect de la confidentialité sont portées à la connaissance des autorités de régulation.	

### 5.3 Are the SSO and the supply business located in separate buildings (GGPSSO 5.1.d)?

answer: oui	<input checked="" type="checkbox"/>
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## 6 Transparency requirements

### 6.1 Are the following commercial terms published (GGPSSO 6.4.a-d):

	<i>In national language</i>	<i>In English</i>	<i>On the internet</i>	<i>Free of charge</i>	<i>Not applicable</i>
(a) if rTPA: tariffs and tariff methodologies for each service offered	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(b) if nTPA: main commercial conditions including the prices for standard services	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(c) If nTPA: updates of main commercial conditions including the prices for standard services, whenever the SSO changes them	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(d) services offered	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(e) storage code	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(f) main storage standard conditions for each service	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(g) rights and responsibilities of all users	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(h) rules (e.g. periods) for counter flows during injection and withdrawal	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(i) rules of storage capacity transfer in case of customer switching (if any)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(j) storage capacity allocation provisions	<input checked="" type="checkbox"/>	<input type="checkbox"/> (1)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(k) congestion management provisions	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(l) anti-hoarding provisions	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(m) re-utilisation provisions	<input type="checkbox"/> (2)	<input type="checkbox"/> (2)	<input type="checkbox"/> (2)	<input type="checkbox"/> (2)	<input type="checkbox"/>
(n) auction terms (where applicable)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(o) rules applicable for storage capacity trade on the secondary market vis-à-vis the SSO	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(p) rules and charges applicable to storage penalties from storage users	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(q) compensation payments from the SSO to storage users	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(r) user-friendly instruments for calculating charges for a specific service (e.g. a tariff calculator)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

(1) la traduction sera effectuée au plus tôt.

(2) l'information sera publiée à la mise en place du service de réutilisation de la capacité réservée non nominée, *ie.* avant le 1<sup>er</sup> avril 2006.

**6.2 Is the following operational information published (GGPSSO 6.5.a-e, 6.6.a-c, 6.9, 6.10):**

	<i>In national language</i>	<i>In English</i>	<i>In energy units or ncm</i>	<i>Online information system</i>	<i>Free of charge</i>
(a) technical storage capacity	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(b) available storage capacity	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(c) contracted or held storage capacity	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(d) aggregated inflows and outflows at least on a weekly basis for the immediately preceding week	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(e) historical utilization rates at least on a weekly basis for the immediately preceding week	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/> (1)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(f) user-friendly instruments for verifying online the level of available and/or unused storage capacity	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/> (1)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(g) maps indicating the location of their storage facilities and the connecting points of the storage facilities to the relevant network	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/> (1)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(h) methods of determining available storage capacity	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/> (1)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(i) operational parameters, including the rules of ownership and use of working gas	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/> (1)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(j) TSO's pre-emptive rights with operational rules and processes attached	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/> (1)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(k) any storage capacity not available to TPA on the grounds of article 2(9) of the Gas Directive, with substantiated reasons	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(l) all planned maintenance periods that might affect storage users' rights from storage contracts, at least once a year	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/> (1)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(m) the operational information corresponding to planned maintenance periods with adequate advance notice	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/> (1)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(n) regular updates on details, expected duration and effect of the maintenance	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/> (1)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

(e) en ce qui concerne l'année en cours, les taux d'utilisation des groupements de stockage pour la semaine précédente sont fournis chaque semaine. Les taux historiques d'utilisation sont fournis pour l'année antérieure.

(1) non applicable.

**6.3 Where you have not published specific data, please state why (relating to GGPSSO 6.2., 6.3)**

(a) less than three users (information about the aggregate use of storage)	<input checked="" type="checkbox"/>
(b) three users or more, but still commercial sensitivity of information	<input type="checkbox"/>
(c) reasons of cost (or substantial IT development needed)	<input type="checkbox"/>
(d) to avoid any potential market abuse	<input type="checkbox"/>
(e) to avoid significant harm to storage users commercial interest	<input type="checkbox"/>
(f) other (please specify below)	<input type="checkbox"/>
notes:	

**6.4 If you have not published information as required by the GGPSSO about the aggregate use of storage, on the ground that such publication would harm the commercial interest of user(s), are any alternative data published (e.g. aggregate inflows and outflows on a monthly –or any other frequency- basis, non-numerical data)? Please specify and justify why this is the case (relating to GGPSSO 6.3)**

answer:

**6.5 Where unplanned disruptions in access to the storage services occur, do you ensure that (GGPSSO 6.8):**

(a) current system users are notified of that disruption as soon as possible	<input checked="" type="checkbox"/>
(b) information concerning the maintenance and disruptions that have occurred is made available upon request to those affected by the disruption	<input checked="" type="checkbox"/>

**7 Storage penalties**

**7.1 Is there a clause or provision in the storage contract/code providing for compensation payments to the storage users in the event you fail to fulfil contractual obligations (GGPSSO 8.1.a)?**

answer: oui

## 8 Secondary markets

### 8.1 Are registered users allowed to trade in the secondary market (GGPSSO 9.1)

(a) bundled services only	<input checked="" type="checkbox"/>
(b) both bundled and unbundled services	<input type="checkbox"/>

### 8.2 Have you developed and used standardised contracts and procedures on the primary market to facilitate secondary trade of storage capacity (GGPSSO 9.1)?

answer:	<input checked="" type="checkbox"/>
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Le contrat d'accès au stockage prévoit les possibilités de cession de capacité entre clients. Il est prévu que les quantités réservées sur le marché primaire soient alors révisées.

### 8.3 Is there a clause in the storage code/contract referring to or addressing secondary storage capacity trading explicitly (relating to GGPSSO 9.1)?

answer:	<input checked="" type="checkbox"/>
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Le contrat d'accès au stockage prévoit les possibilités de cession de capacité entre clients. Il est prévu que les quantités réservées sur le marché primaire soient alors révisées.

### Do you provide an electronic platform or bulletin board to facilitate secondary storage capacity trading (GGPSSO 9.2, 9.3)

answer:	<input checked="" type="checkbox"/>
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### 8.4 Have you taken any other steps to facilitate secondary storage capacity trading (GGPSSO 9.1)? Please specify how

answer:
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## 9 Implementation of the other GGPSSO requirements

### 9.1 Necessary TPA Services – please indicate if you:

	<i>As of 1 April 2005</i>	<i>Planned date of introduction</i>	<i>Not applicable</i>
(a) offer unbundled services supplementing SBUs at least for available storage capacity at the beginning of the storage year (GGPSSO 3.3.b)	<input checked="" type="checkbox"/>		<input type="checkbox"/>
(b) offer short-term (<1 year) services down to a minimum period of one day (GGPSSO 3.3.c)	<input type="checkbox"/>	1 <sup>er</sup> avril 2006 au plus tard pour les services journaliers	<input type="checkbox"/>
(c) offer both firm and interruptible storage services (GGPSSO 3.3.d)	<input checked="" type="checkbox"/>	de nouvelles offres seront introduites avant le 1 <sup>er</sup> avril 2006.	<input type="checkbox"/>

(b) démarrage de contrat possible en cours d'année au 1<sup>er</sup> jour calendaire de chaque mois. Les contrats peuvent donc être souscrits pour des durées inférieures à un an.

### 9.2 Where not already provided, please provide brief details on steps you plan to take to facilitate their introduction

Answer : la vente de capacité réservée non nominée et la commercialisation de services journaliers sont à l'étude et font l'objet d'une consultation avec les clients et les prospects. La mise en œuvre opérationnelle nécessite l'adaptation du système d'information.

### 9.3 Secondary market – please indicate if you:

	<i>As of 1 April 2005</i>	<i>Planned date of introduction</i>	<i>Not applicable</i>
(a) allow for title transfer for both bundled and unbundled capacities (GGPSSO 9.1)	<input type="checkbox"/>	Avant le 1er décembre 2006	<input type="checkbox"/>
(b) recognise the transfer of rights where notified by storage users for both bundled and unbundled capacities (GGPSSO 9.1)	<input type="checkbox"/>	Avant le 1er décembre 2006	<input type="checkbox"/>
(c) allow the new owner to aggregate such storage capacity operationally (GGPSSO 9.1)	<input type="checkbox"/>	Avant le 1er décembre 2006 (*)	<input type="checkbox"/>

(\*) tant que cela reste compatible avec le type de services disponibles sur le marché primaire.

### 9.4 Where not already provided, please provide brief details on steps you plan to take to facilitate their introduction

answer: il est nécessaire de développer le système d'information de Gaz de France pour rendre le fonctionnement du marché secondaire complètement opérationnel.

## ***Appendix***

### ***Definitions***

**Available storage capacity** means the part of the technical storage capacity that is not contracted or held by storage users at that moment and still available to the storage users for firm and interruptible services, and is not excluded from TPA under Article 2(9) of the Gas Directive (Definition 1 of the GGPSSO)

**Storage capacity** is space (expressed in normal cubic meters or energy), injectability and deliverability (expressed in normal cubic meters or energy per time unit). All of them can be firm or interruptible (Definition 17 of the GGPSSO)

**Storage facility** means a facility used for the stocking of natural gas and owned and/or operated by a natural gas undertaking, including the part of LNG facilities used for storage but excluding the portion used for production operations, and excluding facilities reserved exclusively for transmission system operators in carrying out their functions (Definition 18 of the GGPSSO)

**Technical storage capacity** is the maximum storage capacity (injectability, deliverability and space) that the SSO can offer to storage users, excluding storage capacity for SSOs operational needs