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**Per Telefax: 0032 2 78873-50**  
 ERGEG  
 European Regulators Group  
 for Electricity and Gas  
 c/o CEER Secretariat  
 Brüssel  
 BELGIEN

Ihr Zeichen	Ihre Nachricht vom	Unser Zeichen	Ansprechpartner / Durchwahl	Datum
		Um/Hr	Herr Umbeck -211	20. Juni 2005

### Fragebogen der ERGEG zum Speicherzugang

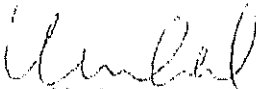
Sehr geehrte Damen und Herren,

beiliegend erhalten Sie den von uns ausgefüllten Fragebogen, den wir heute auch der RegTP und der Europäischen Kommission übersandt haben. Die Beantwortung erfolgt freiwillig ohne Anerkennung einer Rechtspflicht und ohne Haftung für Übersetzungsfehler.

Mit freundlichen Grüßen

Gas-Union GmbH

  
 Wiemer

  
 Umbeck



ERGEG – Questionnaire SSO

## Questionnaire

## 1 General

1.1 Business name of respondent: Gas-Union GmbH, Frankfurt

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 (please provide comments below)	<input type="checkbox"/>
notes:	

1.3 Is access provided:

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

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

answer: Weniger als 3

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"/>



## ERREG – Questionnaire SSO

## 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: *) s. unten	
(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 in Vorbereitung, da Speicher im Aufbau	<input checked="" type="checkbox"/>
(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 (please specify below)	<input type="checkbox"/>
notes:	

\*)

## Gezeichnetes Kapital und Beteiligungsverhältnisse (Stand 31.12.2003)

Gesellschafter	Mio. €	%
Mainova AG, Frankfurt am Main	8,671	37,70
RGE Holding GmbH, Essen	5,965	25,93
Kraftwerke Mainz-Wiesbaden AG, Mainz	4,025	17,50
Städtische Werke AG, Kassel	2,323	10,10
Stadtwerke Göttingen AG, Göttingen	1,549	6,73
Gas- und Wasserversorgung Fulda GmbH, Fulda	0,467	2,04
	23,000	100,00



EREGEG - Questionnaire SSO

### 3 Necessary TPA services

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

	$m^3$ Space	$m^3/h$ Injectability	$m^3/h$ Deliverability
(a) technical capacity	80 Mio-	40.000	max. 100.000
(b) available capacity Vertraulich*)			*)
(c) contracted or held capacity Vertraulich*)			*)
(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>			
notes:			
(e) any other capacity excluded from TPA - other than the portion used for production operations and facilities reserved exclusively for the TSO			
notes:			

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 type="checkbox"/>
(c) no PSO	<input checked="" type="checkbox"/>
(d) other	<input type="checkbox"/>
notes:	

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 type="checkbox"/>
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3.4 If any capacity needed for any PSO is NOT offered on a TPA basis, please state why:

(a) national legislation	<input type="checkbox"/>
(b) other	<input type="checkbox"/>
notes:	

\*) Vertraulich, da weniger als 3 System-Nutzer

<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



## ERGEG – Questionnaire SSO

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)

	Space	Injectability	Deliverability
(a) normalised cubic meters			

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 type="checkbox"/>
(c) injection and withdrawal are possible at any time	<input 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:	

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

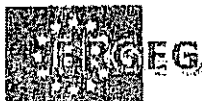
explanation:
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3.10 Where there are limitations on the offer of services on the ground of either storage technical constraints or the economically efficient use of the storage infrastructure:

(a) was it made public and substantiated (GGPSSO 3.4 b)? *)	<input checked="" type="checkbox"/>
reasons for limitations: - Mindestflüsse für Ein- und Ausspeicherung und Messung	

\*) In Vorbereitung, da Speicher noch im Aufbau  
(Realisierung geplant bis 10/2005)

- Technische Grenzen



## EREG - Questionnaire SSO

- 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 checked="" 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) in Vorbereitung, da Speicher im Aufbau	<input checked="" type="checkbox"/>
(d) consultation process supervised by relevant national regulatory authority	<input type="checkbox"/>
(e) other (please specify below)	<input type="checkbox"/>
details on consultation process:	

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

	Space	Injectability	Deliverability
(a) bundled services (SBU) of space and injectability/deliverability	Speicher im Aufbau		
(b) injection and withdrawal are possible at any time			

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

answer: ja (in Vorbereitung, da Speicher im Aufbau)	<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	mehr als 10 Jahre
(b) other services	---
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:

	Email	Internet	Other (Fax)
(a) nominations	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(b) capacity bookings	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(c) transfers of capacity rights between storage users	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(d) other	<input type="checkbox"/>	<input 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 type="checkbox"/>
(c) capacity follows the customer	<input type="checkbox"/>
(d) other (please specify below)	<input checked="" type="checkbox"/>
notes: first committed first served	



## ERREG - Questionnaire SSO

## 4.2 Is the capacity allocation mechanism designed:

(a) by the SSO	<input checked="" type="checkbox"/>
(b) by national legislation	<input type="checkbox"/>
(c) other (please specify below)	<input type="checkbox"/>
notes:	

## 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 checked="" 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 (please specify below)	<input type="checkbox"/>
notes:	

## 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 (please specify below)	<input type="checkbox"/>
notes:	

## 4.5 Is the congestion management mechanism designed:

(a) by the SSO	<input checked="" type="checkbox"/>
(b) by national legislation	<input type="checkbox"/>
(c) other (please specify below)	<input type="checkbox"/>
notes:	

## 4.6 The congestion management mechanism:

(a) has it ever been used?	<input type="checkbox"/>
notes:	

## 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 checked="" type="checkbox"/>
notes:	

## 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:	<input checked="" type="checkbox"/>
notes: Für Sekundärmarkt unterbrechbares Angebot geplant	



EREG – Questionnaire SSO

## 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 in Vorbereitung	<input checked="" type="checkbox"/>
(e) have implemented a compliance programme, supervised by a Compliance Officer in Vorbereitung	<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 checked="" type="checkbox"/>
(d) other (please specify below)	<input type="checkbox"/>
notes:	

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

answer:	<input type="checkbox"/>
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ERREG -- Questionnaire SSO

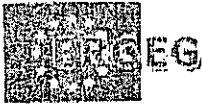
## 6 Transparency requirements

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

	<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 type="checkbox"/>
(b) if rTPA: main commercial conditions including the prices for standard services	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(c) if rTPA: updates of main commercial conditions including the prices for standard services, whenever the SSO changes them	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(d) services offered	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input 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 type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(g) rights and responsibilities of all users	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input 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 type="checkbox"/>
(i) rules of storage capacity transfer in case of customer switching (if any)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(j) storage capacity allocation provisions	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(k) congestion management provisions	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(l) anti-hoarding provisions	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(m) re-utilisation provisions	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(n) auction terms (where applicable)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(o) rules applicable for storage capacity trade on the secondary market vis-à-vis the SSO	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(p) rules and charges applicable to storage penalties from storage users	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(q) compensation payments from the SSO to storage users	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(r) user-friendly instruments for calculating charges for a specific service (e.g. a tariff calculator)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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

	<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 type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(b) available storage capacity	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(c) contracted or held storage capacity	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>



## ERREG – Questionnaire SSO

(d) aggregated inflows and outflows at least on a weekly basis for the immediately preceding week	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(e) historical utilization rates at least on a weekly basis for the immediately preceding week	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(f) user-friendly instruments for verifying online the level of available and/or unused storage capacity	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(g) maps indicating the location of their storage facilities and the connecting points of the storage facilities to the relevant network	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(h) methods of determining available storage capacity	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(i) operational parameters, including the rules of ownership and use of working gas	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(j) TSO's pre-emptive rights with operational rules and processes attached	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input 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 type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(l) all planned maintenance periods that might affect storage users' rights from storage contracts, at least once a year	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(m) the operational information corresponding to planned maintenance periods with adequate advance notice	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(n) regular updates on details, expected duration and effect of the maintenance	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

## 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 checked="" type="checkbox"/>
(d) to avoid any potential market abuse	<input checked="" type="checkbox"/>
(e) to avoid significant harm to storage users commercial interest	<input checked="" type="checkbox"/>
(f) other (please specify below)	<input type="checkbox"/>
notes:	



## ERGEG - Questionnaire SSO

- 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: Speicher im Aufbau

- 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: Gemäß nationalem Recht

## 8 Secondary markets

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

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

- 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:

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

answer: nein (wird vorbereitet, falls Nachfrage im Markt)

- 8.5 Have you taken any other steps to facilitate secondary storage capacity trading (GGPSSO 9.1)? Please specify how

answer: nein (wird vorbereitet, falls Nachfrage im Markt)



EREG – Questionnaire SSO

## 9 Implementation of the other GGPSSO requirements

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

	As of 1 April 2005	Planned date of introduction	Not applicable
(a) offer unbundled services supplementing SBUs at least for available storage capacity at the beginning of the storage year (GGPSSO 3.3 b)	<input type="checkbox"/>	01.10.05	<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"/>	01.01.06	<input type="checkbox"/>
(c) offer both firm and interruptible storage services (GGPSSO 3.3 d)	<input type="checkbox"/>	01.10.05	<input type="checkbox"/>

### 9.2 Where not already provided, please provide brief details on steps you plan to take to facilitate their introduction Speicher ist noch im Aufbau;

answer: Einrichtung bei Nachfrage im Markt

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

	As of 1 April 2005	Planned date of introduction	Not applicable
(a) allow for title transfer for both bundled and unbundled capacities (GGPSSO 9.1)	<input type="checkbox"/>	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"/>	2006	<input type="checkbox"/>
(c) allow the new owner to aggregate such storage capacity operationally (GGPSSO 9.1)	<input type="checkbox"/>	2006	<input type="checkbox"/>

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

answer: IT-Lösungen in Vorbereitung