

ERGEG Gas Focus Group/Storage TF

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

Questionnaire for SSOs

8 February 2006

Introduction

On 15 September 2005, during the 10th Madrid Forum, ERGEG presented the preliminary results of its first monitoring exercise on the implementation of the GGPSSO. The Forum asked ERGEG to produce a follow-up report for the 11th Madrid Forum, to be held at the beginning of May 2006. On 7 December 2005, ERGEG published the final results of its report on "Monitoring the implementation of the GGPSSO". In parallel, ERGEG proposed to undertake a second monitoring exercise assessing the effectiveness of the GGPSSO, and the functioning of the market for storage services.

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 deadline for the completion of the questionnaire is **8 March 2006**.

In order to ensure that all interested parties are consulted, ERGEG members will be required to prepare a contribution to be included in the report. Storage users will be consulted from May 2006, to gather their feedback on the implementation of the GGPSSO requirements after 1 April 2006. Their views will be particularly important in assessing implementation of the GGPSSO.

ERGEG intends to publish an initial report on the implementation of the GGPSSO in May 2006 and it expects to present its findings at the next Madrid Forum. ERGEG will 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 EREG 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 EREG's initial report will be published in May, SSOs may provide an addendum to their original submission if there are any significant changes to the information that they provide, between 8 March and 5 April. This will ensure that the report is as up to date as possible and avoid misrepresenting the position of the SSOs, taking into account that the deadline for implementing some of the GGPSSO requirements is 1 April 2006.

Responses should be sent by email to:

Pierre-Marie Cussaguet (pierre-marie.cussaguet@cre.fr) and Claude-Albane Swanson (claud-albane.swanson@cre.fr).

Questionnaire

1 General

- 1.1 Business name of respondent: TOTAL INFRASTRUCTURES GAZ FRANCE

2 Roles and responsibilities of Storage System Operators

- 2.1 Has the standard storage contract/storage code been developed in proper consultation with users (e.g. bilateral contacts, open consultation process, with some sort of public announcement, consultation process supervised by relevant national regulatory authority or other)? Please specify when users were last consulted (relating to GGPSSO 1.2.b):

The standard storage contract has been developped at the end of 2004 with bilateral contacts with all users and some prospects. It hasn't change since that date.

3 Necessary TPA services

- 3.1 If the figure for “available capacity” for your storage facility¹ is “0”, please specify until when (relating to GGPSSO 3.1):

31th march 2007

- 3.2 There may be some available capacity now (date of reference 8 March 2006). However, all the capacity may have been booked in advance, which means that sometimes in the future, there will be no capacity available. If this is the case, please specify when and for how long (relating to GGPSSO 3.1):

All the capacities are booked by April 2006.

- 3.3 Please provide the link to your web pages presenting the commercial terms that you apply and in particular services offered (both the Directive² and the GGPSSO 6.4.a&b provide that this information is to be published). If you wish to be more specific, please use the space below (relating to GGPSSO 3.3):

<http://www.tigf.fr>

¹ 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 (Article 2.9 of Directive 2003/55/EC).

² Article 19.3 of Directive 2003/55/EC of 26 June 2003 concerning common rules for the internal market in natural gas and repealing Directive 98/30/EC

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

	yes	no
(a) bundled services (SBU) of space and injectability/deliverability	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(b) unbundled services supplementing SBUs at least for available storage capacity at the beginning of the storage year ³	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(c) long-term (>1 year) services	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(d) short-term (<1 year) services ⁴	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(e) interruptible services ⁵	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(f) a service which includes an obligation for the SSO to allocate the gas which has been nominated	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(g) injection and withdrawal are possible at any time	<input checked="" type="checkbox"/>	<input type="checkbox"/>

3.5 If any of these services (please specify) has not been introduced, please explain why:

b is planned to be introduced by July

c is planned to be introduced by September

In both cases, implementation has been delayed because of IT System : TIGF had to face at the same time development (or improvements) of IT's for Transport and Storage activities, and priority has been given to Transport.

3.6 Please specify if services offered have been developed with consultation of storage users to take into account market demand. When were users last consulted (relating to GGPSSO 3.4.a):

Our services and their developments are discussed during bilateral contacts, which have been regularly set during last months (last in date : 9th February).

For instance, these contacts helped us to set the priority between secondary market of unbundled capacities (which appears to be a real need) and the selling of unused capacity on primary market.

³ You may provide an addendum before 5 April 2006.

⁴ You may provide an addendum before 5 April 2006.

⁵ You may provide an addendum before 5 April 2006.

4 Storage capacity allocation and congestion management

4.1 Please provide a description of the capacity allocation mechanism that you apply. Please specify if there is an order of priority and for which customers (relating to GGPSSO 4.1):

Our capacity allocation mechanism combines a geographical and a "type of customers" priority and sets 7 cases (in decreasing order of priority) :

1. *Storage rights linked to domestic customers in TIGF balancing zone*
2. *Storage rights linked to non-domestic customers who didn't accept interruptible furniture in TIGF balancing zone*
3. *Storage rights linked to domestic customers in GRT Gaz balancing zone*
4. *Storage rights linked to non-domestic customers who didn't accept interruptible furniture in GRT Gaz balancing zone*
5. *Storage rights linked to other customers in TIGF balancing zone*
6. *Storage rights linked to domestic customers in GRT Gaz balancing zone*
7. *Other storage needs*

This temporary rule will be abolished by the national legislation, which will set a new rule (by July 2006).

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

It is possible to establish, for each capacity booked, its rank of priority. If a storage user want to book a capacity, TIGF will demand to other users with a lower rank to give back the capacities needed.

4.3 In case of physical congestion, what kind of solution do you apply or plan to apply (GGPSSO 4.2)?

4.4 In case of congestion, is there a system to balance the portion of storage capacity contracted under long-term contracts and short term contracts? Please specify the nature of these arrangements (GGPSSO 4.2.c):

Allocation rules applies both on long term and short term contracts.

5 Confidentiality requirements

5.1 Are the following items explicitly mentioned in the code of conduct/compliance programme (relating to GGPSSO 5.1.b):

	yes	no
(a) prohibition on SSO staff passing commercially sensitive information to other parts of any affiliate of the company in advance of being provided to all market participants	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(b) databases related to storage operations kept separate	<input type="checkbox"/>	<input type="checkbox"/>
(c) new IT systems for the storage business developed separately	<input type="checkbox"/>	<input type="checkbox"/>

5.2 Please specify if there are other important items in the code of conduct/compliance programme:

5.3 Is the code of conduct/compliance programme published? If yes, provide a copy / internet link:

	yes	no
	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Internet link: http://www.tigf.fr/iso_album/codedebonneconduitejuin2005mh.pdf		

5.4 Is there a compliance officer supervising that the compliance programme is effectively implemented (GGPSSO 5.1.b)?

	yes	no
	<input checked="" type="checkbox"/>	<input type="checkbox"/>

5.5 If other arrangements are in place to protect the confidentiality of information, please provide details below (relating to GGPSSO 5.1):

--

6 Transparency requirements
6.1 Please provide the link to the webpages presenting the information required by the GGPSSO in the transparency requirements (relating to GGPSSO 6.1):

http://www.tigf.fr/pageLibre0001030e.htm Aggregated inflows and outflows are published from 1 st April.
--

6.2 Please specify how the historical utilization rate is calculated (relating to GGPSSO 6.5.b):

The historical utilization rate is calculated as follows : inflows (or outflows) / sum of users nominal rights
--

6.3 If you have not published information as required by the GGPSSO about the aggregate use of storage, did you notify the relevant national regulatory authority (GGPSSO 6.3)?

	yes	no
	<input type="checkbox"/>	<input checked="" type="checkbox"/>

6.4 Please specify how many users – if any – requested, via a correspondence, that you do not publish information about the aggregate use of storage (period of reference: 15 March 2006 – 15 March 2007) (relating to GGPSSO 6.2)?

None

7 Secondary markets
7.1 How many system users trade capacity rights on the secondary market (period of reference: 15 March 2005 – 8 March 2006⁶)?

None

⁶ You may provide an addendum before 5 April 2006.

7.2 Please indicate if you:

	yes	no
(a) allow for title transfer for both bundled and unbundled capacities (GGPSSO 9.1)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(b) allow the new owner to aggregate such storage capacity operationally (GGPSSO 9.1)	<input type="checkbox"/>	<input checked="" type="checkbox"/>

7.3 Are registered users allowed to trade gas-in-store?

	yes	no
	<input checked="" type="checkbox"/>	<input type="checkbox"/>

7.4 Please provide a description of rules applicable for storage capacity trade on the secondary market vis-à-vis the SSO (GGPSSO 9.1):

The Seller and the Buyer of capacity (for the moment, only bundled capacities) just have to inform TIGF with a one month notice. TIGF make amendments to the contracts.

7.5 Please provide a copy of the clauses in the storage code/contract referring to or addressing secondary storage capacity trading explicitly (relating to GGPSSO 9.1):

(Storage Contract, art 2.5)

The Customer shall be entitled to assign to or receive one or more Storage Units from a Storage Facility User only with the prior consent of the Storage Facility Manager, which may refuse such request only on reasonable grounds. In the event that the Customer should breach this provision, the Storage Facility Manager shall be entitled to terminate the Contract automatically, with no advance notice or compensation. The assignor and the assignee of Storage Units shall send the Storage Facility Manager, at least thirty (30) days prior to the effective date of the assignment, a joint written request specifying their respective identities, the entire number of Storage Units transferred, the effective date of the assignment, which can be only the first Day of a Month, and the effective end date of the assignment, which can be only 31st March of any year. The Storage Facility Manager undertakes to respond within ten (10) days as of receipt of such request.

The assignment will be effective on the first Day of the Month, for the validity period of the assignment. The Storage Units subscribed by the assignor and the assignee shall then be adjusted, and after the assignment, the assignor and the assignee shall be responsible for their contractual obligations, particularly those relating to the Minimum Stock and Maximum Stock. A price supplement, as stated in the Scale, shall be payable in respect of each assignment.

The assignment of a Storage Unit will be valid only as of execution of a rider to the assignor's and to the assignee's contracts and the fulfilment by the assignor of the conditions specified in Article 2.2 above. The assignor shall then be released from its/his obligations in respect of the assigned Storage Units for the term of validity of the assignment.

If the validity period of the assignment is less than the Validity Period of one or more Storage Units concerned, and unless there is a new assignment in accordance with the provisions of this Article prior to the end of the validity period of the assignment, the Storage Units concerns will be re-assigned automatically to the initial assignor.

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