

ERGEG 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 Directive¹). 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.

¹ 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

ERGEG 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:

[insert contact details of NRA]

Questionnaire

1 General

1.1 Business name of respondent: holders of the **Alkmaar Gas Storage licence**

Met opmaak:
opsommingstekens en
nummering

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: N/A

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

answer: zero at this time. One from August 2002 till March 2004.

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? No	<input type="checkbox"/>
(b) if "yes", did you notify your relevant national regulatory authority (GGPSSO Scope and Objective)?	<input type="checkbox"/>

Verwijderd: 4

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) PGI is owned by three partners who hold the Alkmaar Storage License. BPNE Piek Gas B.V., Petro-Canada Netherlands B.V. and Dyas B.V., each with different interests in NL and worldwide.	<input checked="" 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 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: N/A	
(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 type="checkbox"/>

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

(a) have developed and use standard storage contracts, published on website since 2002	<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. Consulted with potential users every year prior to publication.	<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) Initial publication in 2002 covered in gas press, list of potentially interested parties drawn up from response to this publication. List has grown larger every year and each party is contacted by e-mail to inform on each substantial update to the website. General presentation and consultations have been offered every year since 2002, all responding parties have requested individual consultation session.	<input checked="" type="checkbox"/>
(d) consultation process supervised by relevant national regulatory authority	<input type="checkbox"/>
(e) other (<i>please specify below</i>)	<input type="checkbox"/>
notes:	

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	33.3 million Nm3	0.24 million Nm3/d	2.4 million Nm3/d
(b) available capacity	33.3 million Nm3	0.24 million Nm3/d	2.4 million Nm3/d
(c) contracted or held capacity	0	0	0
(d) any storage capacity not available to TPA on the grounds of article 2(9) of the Gas Directive, with substantiated reasons ²	0	0	0
notes:			
(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: All capacity is contracted to Gasunie N.V. under agreement signed in 1996 which led to the construction of the facility. The capacity is required by Gasunie N.V. 100% for production purposes. Gasunie has been releasing unused capacity from year to year to be remarketed. It is our understanding that Gasunie N.V. has subcontracted a proportion of their capacity to GTS to meet a PSO.			

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 type="checkbox"/>
(d) other	<input checked="" type="checkbox"/>
notes: It is our understanding that there is a PSO placed upon the TSO for to meet peak requirements between -9 deg C and -17 deg C. There is also a PSO placed on Gasunie N.V. as a result of the small fields policy.	

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) To the extent released by Gasunie N.V. from year to year for remarketing	<input checked="" 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: Not applicable	

² 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)

	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 checked="" type="checkbox"/>
(c) injection and withdrawal are possible at any time offered for matching nominations. Technical constraints make this infeasible for physical nominations	<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 No	<input type="checkbox"/>
(b) injection and withdrawal are possible at any time yes	<input checked="" 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 and environmental and permitting constraints	<input checked="" 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:

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: Minimum flow constraints are written into the standard storage agreement and well documented on the website and explained to regulator and to all consulted parties. To get around these constraints access to minimum flow is offered to all TPA customers on a use-it-or-lose it basis such that under specific rules and circumstances they may be entitled to use more capacity than they book.	

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 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: Consultation held with all interested parties in 2002, 2003 and 2004 by public invitation and individual consultation sessions.	

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	2.77 million NM3	0.02 million Nm3/d	0.2 million Nm3/d
(b) injection and withdrawal are possible at any time, for matching nominations there is no minimum size	0	0	0

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

answer: yes, in order overcome minimum production and injection flow	<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 currently available until April 2007.	
(b) other services None	
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
(a) Nominations	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(b) capacity bookings	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(c) transfers of capacity rights between storage users	<input type="checkbox"/>	<input type="checkbox"/>	<input 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 checked="" type="checkbox"/>
(c) capacity follows the customer	<input type="checkbox"/>
(d) other (<i>please specify below</i>)	<input checked="" type="checkbox"/>
notes: Open offer period with deadline, if overbooked then reduce pro-rata, if not all sold then in past years marketing has continued throughout the year on a first come first served basis	

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 (<i>please specify below</i>) worked out in consultation with Gasunie NV and explained to regulator and interested parties at consultation rounds	<input checked="" 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 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 checked="" type="checkbox"/>
(d) consultation process supervised by relevant national authority	<input type="checkbox"/>
(e) other (<i>please specify below</i>)	<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 (<i>please specify below</i>)	<input checked="" type="checkbox"/>
notes: will consult with user(s) and otherwise pro-rata	

4.5 Is the congestion management mechanism designed:

(a) by the SSO will be in consultation with user(s) should need arise	<input checked="" type="checkbox"/>
(b) by national legislation	<input type="checkbox"/>
(c) other (<i>please specify below</i>)	<input type="checkbox"/>
notes:	

4.6 The congestion management mechanism:

(a) has it ever been used?	<input type="checkbox"/>
notes: No	

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"/>
notes: Yes, up to the minimum injection and production rates.	

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 type="checkbox"/>
notes: no example of hoarding to date, users can trade unused capacity in the secondary market, will work with users to provide a bulletin board or on-line capacity transfer system if they request it and if we get more than one TPA customer at any time.	

5 Confidentiality requirements
5.1 Please indicate if you (GGPSSO 5.1.a-c):

(a) keep databases related to storage operations separate yes	<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) yes	<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 yes	<input checked="" type="checkbox"/>
(d) have drafted a code of conduct, no, will do in the event of multiple customers	<input type="checkbox"/>
(e) have implemented a compliance programme, supervised by a Compliance Officer no, will do in the event of multiple customers	<input 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 type="checkbox"/>
notes:	

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

answer: currently separate cities	<input 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 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 type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(d) services offered	<input 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 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 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 checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(i) rules of storage capacity transfer in case of customer switching (if any)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(j) storage capacity allocation provisions	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" 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 checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(m) re-utilisation provisions	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<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 type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 checked="" type="checkbox"/>
(q) compensation payments from the SSO to storage users	<input 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 type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
English is the language of the gas industry in Holland. No company or user has requested any information to be published in Dutch					

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 type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(b) available storage capacity	<input 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 type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

Verwijderd: 4

(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 checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(h) methods of determining available storage capacity	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(i) operational parameters, including the rules of ownership and use of working gas	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" 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 checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(m) the operational information corresponding to planned maintenance periods with adequate advance notice	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(n) regular updates on details, expected duration and effect of the maintenance	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 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: Yes

8 Secondary markets

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

(a) bundled services only, users can unbundle and remarket	<input checked="" 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: no

- 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: yes

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

answer: no

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

answer: yes, we have discussed with potential users how this might achieved

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 type="checkbox"/>		<input checked="" type="checkbox"/>
(b) offer short-term (<1 year) services down to a minimum period of one day (GGPSSO 3.3.c)	<input type="checkbox"/>		<input checked="" type="checkbox"/>
(c) offer both firm and interruptible storage services (GGPSSO 3.3.d)	<input type="checkbox"/>		<input checked="" type="checkbox"/>

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

answer: we have consultation rounds and we talk to potential customers about new products

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 checked="" type="checkbox"/>		<input type="checkbox"/>
(b) recognise the transfer of rights where notified by storage users for both bundled and unbundled capacities (GGPSSO 9.1)	<input checked="" type="checkbox"/>		<input type="checkbox"/>
(c) allow the new owner to aggregate such storage capacity operationally (GGPSSO 9.1)	<input checked="" type="checkbox"/>		<input type="checkbox"/>

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

answer:

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