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## GGPSSO implementation

Dear Mr. Vasconcelos,

GSE - Gas Storage Europe is the association of the European Storage Operators having 22 members and representing the major part of storage volume in Europe. GSE has been involved in the drafting of the GGPSSO throughout the Madrid process and considers it of utmost importance to involve the industry in setting up the regulatory framework for storage.

GSE welcomes the fact that the ERGEG report highlights the progress made by the SSOs towards the full implementation of the GGPSSO. GSE has identified areas where further consideration is necessary in order to best possibly meet the requirements of the GGPSSO and the market needs.

Please find attached specific comments by RWE-Transgas, Nafta, BEB, VNG, E.ON-Ruhrgas and Gaz de France partly already received by you in order to allow you for a revision of the ERGEG report where necessary. Amongst the comments raised by GSE members we think it is important to highlight the following points:

- The overall report emphasises the progress made by the SSOs. With view to the confidentiality requirements the fact that “the GGPSSO explicitly require that SSOs publish numerical data” should also take into consideration existing confidentiality requirements which are also recognised by the GGPSSO. In particular we think that SSOs applying the lesser-3-rule can be compliant with the GGPSSO (see page 27, footnote 2 ERGEG report);
- The GGPSSO entered into force on 1 April 2005 - two weeks after they were agreed. We believe that the GGPSSO took this fact into consideration when they allowed for the implementation of some transparency requirements by 1 April 2006; an exemption that refers for example to substantial IT developments and not only to “small” SSOs (see page 33, ERGEG report);
- Where possible the ERGEG report should reflect the national specificities including different regulatory regimes and competences instead of using a rather statistical approach.

With view to that, GSE will organise a workshop involving storage users, SSOs and regulators focussing in particular on transparency requirements in Brussels on 16 November 2005. The invitation will be sent to you separately.

GSE urges its members to fully implement the GGPSSO by the end of the thermal year 2005/2006 and with view to the ERGEG monitoring report to be presented at the next Madrid Forum.

Best regards,

Klaus-Dieter Barbknecht

President