

## **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 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.

<sup>&</sup>lt;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



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

D	in an arrange of the construction of the const				
Bus	iness name of respondent: swb Netze GmbH & Co. KG				
ls ac	ccess to your storage system provided:				
(a)	on a regulated basis				
(b)	on a negotiated basis	$\boxtimes$			
(c)	both (please provide comments below)				
	notes:				
ls ac	ccess provided:				
(a)	to a given storage facility	$\boxtimes$			
(b)	to a group of storage facilities in the same balancing zone				
, ,	other (places previde comments balancy)				
(c) other (please provide comments below)					
	notes:  swer that access is provided to a given storage facility/to a group of storage, please	e assume that			
ou an	notes: <u>swer that access is provided to a given storage facility/to a group of storage, please following answers will be interpreted accordingly</u> cess to storage is not provided to individual storage facilities, please providy groups, how many sites within group) and specify how this is arranged:				
ou an	notes:  swer that access is provided to a given storage facility/to a group of storage, please following answers will be interpreted accordingly  cess to storage is not provided to individual storage facilities, please provide				
If ac man	notes: <u>swer that access is provided to a given storage facility/to a group of storage, please following answers will be interpreted accordingly</u> cess to storage is not provided to individual storage facilities, please providy groups, how many sites within group) and specify how this is arranged:				
If ac man ans	notes:  swer that access is provided to a given storage facility/to a group of storage, please following answers will be interpreted accordingly  cess to storage is not provided to individual storage facilities, please providing groups, how many sites within group) and specify how this is arranged:  wer: None				
If acman ans	notes:  swer that access is provided to a given storage facility/to a group of storage, please following answers will be interpreted accordingly  cess to storage is not provided to individual storage facilities, please providing groups, how many sites within group) and specify how this is arranged:  wer: None  many system users own capacity rights (date of reference: 1 April 2005)?				
If ac man ans	notes:  swer that access is provided to a given storage facility/to a group of storage, please following answers will be interpreted accordingly  cess to storage is not provided to individual storage facilities, please providy groups, how many sites within group) and specify how this is arranged:  wer: None  many system users own capacity rights (date of reference: 1 April 2005)?  wer: 1				





## 2 Roles and responsibilities of Storage System Operators

(a)	a separate entity (i.e. ownership unbundling)	
(b)	a separate entity (i.e. legal unbundling)	
(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)	$\boxtimes$
(d)	part of a vertically integrated company (i.e. unbundling of accounts)	
n th	e case of a SSO being part of a vertically integrated company:	
(a)	please provide details on the ownership structure. If an ownership diagram is avail attach it to the completed questionnaire.	able, pleas
	details: see enclosure	
(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).	$\boxtimes$
Plea	se 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)	
(c)	consulted users in developing the standard storage contracts or the storage code	
Plea		standard
Plea	se provide details on how the consultation process for developing	standard
Plea cont	se provide details on how the consultation process for developing racts/storage code was conducted (relating to GGPSSO 1.2.b)	standard
Plea cont (a)	se provide details on how the consultation process for developing racts/storage code was conducted (relating to GGPSSO 1.2.b) bilateral contacts with some users	standard
Pleacont (a) (b)	se provide details on how the consultation process for developing racts/storage code was conducted (relating to GGPSSO 1.2.b)  bilateral contacts with some users  bilateral contacts with all users and some prospects  open consultation process, with some sort of public announcement (e.g. on	
Pleacont (a) (b) (c)	se provide details on how the consultation process for developing racts/storage code was conducted (relating to GGPSSO 1.2.b)  bilateral contacts with some users  bilateral contacts with all users and some prospects  open consultation process, with some sort of public announcement (e.g. on company website, by press, at a conference)	



3.2

3.3

3.4

### 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	Injectal	hility	Deliverabilit
		, 1	IIIJeciai	Ollity	Deliverabilit
(a)	technical capacity	89 Mio. Nm³			
(b)	available capacity	72 Mio. Nm³	20.00 Nm³/		160.000 Nm³/h
(c)	contracted or held capacity	72 Mio. Nm³	20.00 Nm³		160.000 Nm³/h
(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				
	(				L
	notes: ase indicate if Public Service Obligations (PSO) in	your country a	are place	ed or	n (relating t
		your country a	are place	ed or	n (relating t
GGF	ase indicate if Public Service Obligations (PSO) in PSSO 3.2, 3.5, 3.6-3-15):	your country a	are place	ed or	relating t
(a) (b)	ase indicate if Public Service Obligations (PSO) in PSSO 3.2, 3.5, 3.6-3-15): the SSO the shippers	your country a	are place	ed or	r (relating t
(a) (b) (c)	ase indicate if Public Service Obligations (PSO) in PSSO 3.2, 3.5, 3.6-3-15): the SSO the shippers	your country a	are place	ed or	
(a) (b) (c)	ase indicate if Public Service Obligations (PSO) in PSSO 3.2, 3.5, 3.6-3-15): the SSO the shippers no PSO	your country a	are place	ed or	
(a) (b) (c) (d)	ase indicate if Public Service Obligations (PSO) in PSO 3.2, 3.5, 3.6-3-15): the SSO the shippers no PSO other	your country a	are place	ed or	
(a) (b) (c) (d)	ase indicate if Public Service Obligations (PSO) in PSSO 3.2, 3.5, 3.6-3-15):  the SSO the shippers no PSO other notes:			ed or	
(a) (b) (c) (d)	ase indicate if Public Service Obligations (PSO) in PSO 3.2, 3.5, 3.6-3-15):  the SSO the shippers no PSO other notes:	A basis? (GGPS	SO 3.2)		
(a) (b) (c) (d) (a)	ase indicate if Public Service Obligations (PSO) in PSSO 3.2, 3.5, 3.6-3-15):  the SSO  the shippers  no PSO other  notes:  acity for Public Service Obligations (hereafter PSO):  is storage capacity needed for any PSO offered on a TPA	A basis? (GGPS	SO 3.2)		
(a) (b) (c) (d) Cap (a) (a) (f an (a)	ase indicate if Public Service Obligations (PSO) in PSO 3.2, 3.5, 3.6-3-15):  the SSO the shippers no PSO other notes:  acity for Public Service Obligations (hereafter PSO): is storage capacity needed for any PSO offered on a TP	A basis? (GGPS	SO 3.2)		

<sup>&</sup>lt;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

		Space	Injectabil	ity Deliverabilit
(a) n	ormalised cubic meters			
ο γοι	u offer the following services on the primary market	(GGPSSO 3.3	3, 3.5, 3.7):	
(a) b	undled services (SBU) of space and injectability/deliver	ability		$\boxtimes$
	service which includes an obligation for the SSO to allo een nominated	ocate the gas w	hich has	
(c) in	jection and withdrawal are possible at any time			
n	otes:			
re the	e following services separately charged (GGPSSO 3	3.3., 3.5, 3.7)?		
	service which includes an obligation for the SSO to allo	ocate the gas w	hich has	
(b) in	jection and withdrawal are possible at any time			
n	otes:			
	some services have NOT been introduced, please strips for the SSO to allegate according to permitting	state why (GG	PSSO 3.4.b,	3.5, 3.6, 3.7):
Obliga	ation for the SSO to allocate according to nominations			3.5, 3.6, 3.7):
Obliga (a)	ation for the SSO to allocate according to nominations consistent with the use of the interconnected gas trans	nsmission syste		3.5, 3.6, 3.7):
Obliga	ation for the SSO to allocate according to nominations	nsmission syste		3.5, 3.6, 3.7):
Obliga (a) (b)	ation for the SSO to allocate according to nominations consistent with the use of the interconnected gas tran not compatible with the balancing regime of the interco	nsmission syste		3.5, 3.6, 3.7):
Obliga (a) (b)	ation for the SSO to allocate according to nominations consistent with the use of the interconnected gas tran not compatible with the balancing regime of the interconnected transportation system	nsmission syste		. 3.5, 3.6, 3.7):
Obliga (a) (b) Injecti	ation for the SSO to allocate according to nominations  consistent with the use of the interconnected gas tran  not compatible with the balancing regime of the interc  transportation system  on and withdrawal possible at any time	nsmission syste		. 3.5, 3.6, 3.7):
Obliga (a) (b) Injecti (c)	ation for the SSO to allocate according to nominations consistent with the use of the interconnected gas tran not compatible with the balancing regime of the interc transportation system on and withdrawal possible at any time storage technical constraints	nsmission syste	em	. 3.5, 3.6, 3.7):
Obliga (a) (b) Injecti (c) (d)	ation for the SSO to allocate according to nominations consistent with the use of the interconnected gas tran not compatible with the balancing regime of the interconnected gas tran transportation system on and withdrawal possible at any time storage technical constraints economically use of the storage infrastructure	nsmission syste	em	. 3.5, 3.6, 3.7):
Obliga (a) (b) Injecti (c) (d) (e) (f)	ation for the SSO to allocate according to nominations consistent with the use of the interconnected gas tran not compatible with the balancing regime of the interconnected gas tran on and withdrawal possible at any time storage technical constraints economically use of the storage infrastructure consistent with the use of the interconnected gas tran not consistent with PSOs  of these services (please specify) has not been	nsmission syste	em	
Obliga (a) (b) Injecti (c) (d) (e) (f)  f any	ation for the SSO to allocate according to nominations consistent with the use of the interconnected gas tran not compatible with the balancing regime of the interconnected gas tran on and withdrawal possible at any time storage technical constraints economically use of the storage infrastructure consistent with the use of the interconnected gas tran not consistent with PSOs  of these services (please specify) has not been	nsmission syste	em	
Obliga (a) (b) Injecti (c) (d) (e) (f) f any explain explain	ation for the SSO to allocate according to nominations consistent with the use of the interconnected gas tran not compatible with the balancing regime of the interconnected gas tran on and withdrawal possible at any time storage technical constraints economically use of the storage infrastructure consistent with the use of the interconnected gas tran not consistent with PSOs  of these services (please specify) has not been in why	nsmission systements on systemetric description in the ground	em  or any other	□ □ □ □ □ □ □ □ □ □ □ □ □ □ □ □ □ □ □
Obliga (a) (b) Injecti (c) (d) (e) (f)  f any explain explain	ation for the SSO to allocate according to nominations consistent with the use of the interconnected gas transportation system on and withdrawal possible at any time storage technical constraints  economically use of the storage infrastructure consistent with the use of the interconnected gas transportation system of these services (please specify) has not been a why anation: No action necessary, see 6.3.	nsmission systements on systemetric description in the ground	em  or any other	□ □ □ □ □ □ □ □ □ □ □ □ □ □ □ □ □ □ □



ERGEG – Questionnaire SSO

	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					
	(b) bilateral contacts with all users and some prospects					
	(c) open consultation process, with some sort of public announce company website, by press, at a conference)	ment (e.g. or	1		$\boxtimes$	
	(d) consultation process supervised by relevant national regulator	y authority				
	(e) other (please specify below)					
	details on consultation process:					
3.12	Please specify the minimum size for each service (GGPSSO 3.8	B) Space	Injecta	bilitv	Deliverability	
	(-, -, -, -, -, -, -, -, -, -, -, -, -, -	533.000 m³ geometrical	20.00 Nm³	00	160.000 Nm³/h	
	(b) injection and withdrawal are possible at any time					
3.13	Are storage users allowed to pool their nominations with a thresholds (GGPSSO 3.8)?	view to ove	rcome	poten	tial capacity	
	answer:					
	notes:					
3.14	Please specify the maximum duration for each service offered		) (GGP			
	(a) bundled services (SBU) of space and injectability/deliverability	<u>'</u>		1	10 years	
	(b) other services					
	notes:					
3.15	Please specify if you have developed information systems provide adequate data to storage users and to simplify transactions.			mmu	nications to	
		Email	Inte	rnet	Other	
	(a) nominations				1 011101	
	(b) capacity bookings			]		
	(b) capacity bookings (c) transfers of capacity rights between storage users					



ERGEG – Questionnaire SSO

s the capacity allocation mechanism designed:	
(a) by the SSO	
(b) by national legislation	
(c) other (please specify below)	
notes: in accordance with the contract	
Have these mechanisms and procedures been subject to consultation with st olease provide details on how the consultation process was conducted (GGPS	
(a) bilateral contacts with some users	
(b) bilateral contacts with all users and some prospects	
(c) open consultation process, with some sort of public announcement (e.g. on company website, by press, at a conference)	
(d) consultation process supervised by relevant national authority	
(e) other (please specify below)	
notes:	
n case of congestion, what kind of solution do you apply or plan to apply (GG	PSSO 4.2)
(a) market based (e.g. auctions)	
(b) pro rata	
(c) other (please specify below)	
notes: The process for finding a solution is just begining	
s the congestion management mechanism designed:	
(a) by the SSO	$\boxtimes$
(b) by national legislation	
(c) other (please specify below)	
notes: The process for congestion management is just begining	
The congestion management mechanism:	
The congestion management mechanism:  (a) has it ever been used?	
(a) has it ever been used?	y and deliverability
(a) has it ever been used?  notes: We don't use congestiion management until now  Jnused capacity (e.g. day-ahead release of non-nominated injectability	y and deliverability
(a) has it ever been used?  notes: We don't use congestiion management until now  Jnused capacity (e.g. day-ahead release of non-nominated injectability GGPSSO 4.4):	y and deliverability
(a) has it ever been used?  notes: We don't use congestiion management until now  Jnused capacity (e.g. day-ahead release of non-nominated injectability GGPSSO 4.4):  (a) do you offer all unused capacity on an interruptible basis?	
(a) has it ever been used?  notes: We don't use congestiion management until now  Journal Capacity (e.g. day-ahead release of non-nominated injectability GGPSSO 4.4):  (a) do you offer all unused capacity on an interruptible basis?  notes: no  Do you use other means to discourage hoarding and facilitate re-utilisation	





## 5 Confidentiality requirements

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

(a)	keep databases related to storage operations separate	$\boxtimes$
(b)	develop new IT systems for the storage business separately (when new IT systems are being developed in vertically integrated undertakings)	
(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	
(d)	have drafted a code of conduct	$\boxtimes$
(e)	have implemented a compliance programme, supervised by a Compliance Officer	$\boxtimes$

## 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	
(b) another relevant national regulatory authority (please specify)	
(c) external audit	
(d) other (please specify below)	
notes: Quality management Sytem DIN EN ISO 9001:2000	

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

answer:	×



#### **Transparency requirements** 6

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

		language	English	internet	charge	applicable
(a)	if rTPA: tariffs and tariff methodologies for each service offered					$\boxtimes$
(b)	if nTPA: main commercial conditions including the prices for standard services					$\boxtimes$
(c)	If nTPA: updates of main commercial conditions including the prices for standard services, whenever the SSO changes them					
(d)	services offered					$\boxtimes$
(e)	storage code					$\boxtimes$
(f)	main storage standard conditions for each service					$\boxtimes$
(g)	rights and responsibilities of all users					$\boxtimes$
(h)	rules (e.g. periods) for counter flows during injection and withdrawal					$\boxtimes$
(i)	rules of storage capacity transfer in case of customer switching (if any)					$\boxtimes$
(j)	storage capacity allocation provisions					$\boxtimes$
(k)	congestion management provisions					$\boxtimes$
(l)	anti-hoarding provisions					$\boxtimes$
(m)	re-utilisation provisions					$\boxtimes$
(n)	auction terms (where applicable)					$\boxtimes$
(0)	rules applicable for storage capacity trade on the secondary market vis-à-vis the SSO					$\boxtimes$
(p)	rules and charges applicable to storage penalties from storage users					$\boxtimes$
(q)	compensation payments from the SSO to storage users					$\boxtimes$
(r)	user-friendly instruments for calculating charges for a specific service (e.g. a tariff calculator)					
ls th	e following operational information publisl	hed (GGPSS	O 6.5.a-e,	6.6.a-c, 6	.9, 6.10):	
		n national language E	ın	n energy units or ncm	Online information system	
(0)	technical storage conscitu					

6.2	is the following	operational information	published (GGPSS	оо 6.5.а-е, 6.6.а-с, (	6.9, 6.10):
-----	------------------	-------------------------	------------------	------------------------	-------------

		In national language	In English	In energy units or ncm	Online information system	Free of charge
(a)	technical storage capacity					
(b)	available storage capacity					
(c)	contracted or held storage capacity					





6.3

(d) aggregated inflows and outflows at least on a weekly basis for the immediately preceding week   (e) historical utilization rates at least on a weekly basis for the immediately preceding week   (f) user-friendly instruments for verifying online the level of available and/or unused storage capacity   (g) maps indicating the location of their storage facilities and the connecting points of the storage facilities to the relevant network   (h) methods of determining available storage capacity   (i) operational parameters, including the rules of ownership and use of working gas   (j) TSO's pre-emptive rights with operational rules and processes attached   (k) any storage capacity not available to TPA on the grounds of article 2(9) of the Gas Directive, with substantiated reasons   (i) all planned maintenance periods that might affect storage users' rights from storage contracts, at least once a year   (m) the operational information corresponding to planned maintenance periods with adequate advance notice   (n) regular updates on details, expected duration and effect of the maintenance   (ii) three users or more, but still commercial sensitivity of information   (c) reasons of cost (or substantial IT development needed)   (d) to avoid any potential market abuse   (e) to avoid significant harm to storage users commercial interest   (f) other (please specify below)   (ii) notes:				_	_	_	
weekly basis for the immediately preceding week  (f) user-friendly instruments for verifying online the level of available and/or unused storage capacity  (g) maps indicating the location of their storage facilities and the connecting points of the storage facilities to the relevant network  (h) methods of determining available storage capacity  (i) operational parameters, including the rules of ownership and use of working gas  (j) TSO's pre-emptive rights with operational rules and processes attached  (k) any storage capacity not available to TPA on the grounds of article 2(9) of the Gas Directive, with substantiated reasons  (i) all planned maintenance periods that might affect storage users' rights from storage contracts, at least once a year  (m) the operational information corresponding to planned maintenance periods with adequate advance notice  (n) regular updates on details, expected duration and effect of the maintenance  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)  (b) three users or more, but still commercial sensitivity of information  (c) reasons of cost (or substantial IT development needed)  (d) to avoid any potential market abuse  (e) to avoid significant harm to storage users commercial interest  (f) other (please specify below)	(d)	on a weekly basis for the immediately					
online the level of available and/or unused storage capacity  (g) maps indicating the location of their storage facilities and the connecting points of the storage facilities to the relevant network  (h) methods of determining available storage capacity  (i) operational parameters, including the rules of ownership and use of working gas  (j) TSO's pre-emptive rights with operational rules and processes attached  (k) any storage capacity not available to TPA on the grounds of article 2(9) of the Gas Directive, with substantiated reasons  (l) all planned maintenance periods that might affect storage users' rights from storage contracts, at least once a year  (m) the operational information corresponding to planned maintenance periods with adequate advance notice  (n) regular updates on details, expected duration and effect of the maintenance  (n) the operational corresponding to planned maintenance periods with adequate advance notice  (n) resular updates on details, expected duration and effect of the maintenance  (b) three users or more, but still commercial sensitivity of information  (c) reasons of cost (or substantial IT development needed)  (d) to avoid any potential market abuse  (e) to avoid significant harm to storage users commercial interest  (f) other (please specify below)	(e)	weekly basis for the immediately					
storage facilities and the connecting points of the storage facilities to the relevant network  (h) methods of determining available storage capacity  (i) operational parameters, including the rules of ownership and use of working gas  (j) TSO's pre-emptive rights with operational rules and processes attached  (k) any storage capacity not available to TPA on the grounds of article 2(9) of the Gas Directive, with substantiated reasons  (l) all planned maintenance periods that might affect storage users' rights from storage contracts, at least once a year  (m) the operational information corresponding to planned maintenance periods with adequate advance notice  (n) regular updates on details, expected duration and effect of the maintenance  (b) three users or more, but still commercial sensitivity of information  (c) reasons of cost (or substantial IT development needed)  (d) to avoid any potential market abuse  (e) to avoid significant harm to storage users commercial interest  (f) other (please specify below)	(f)	online the level of available and/or					
capacity  (i) operational parameters, including the rules of ownership and use of working gas  (j) TSO's pre-emptive rights with operational rules and processes attached  (k) any storage capacity not available to TPA on the grounds of article 2(9) of the Gas Directive, with substantiated reasons  (l) all planned maintenance periods that might affect storage users' rights from storage contracts, at least once a year  (m) the operational information corresponding to planned maintenance periods with adequate advance notice  (n) regular updates on details, expected duration and effect of the maintenance  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)  (b) three users or more, but still commercial sensitivity of information  (c) reasons of cost (or substantial IT development needed)  (d) to avoid any potential market abuse  (e) to avoid significant harm to storage users commercial interest  (f) other (please specify below)	(g)	storage facilities and the connecting points of the storage facilities to the					
rules of ownership and use of working gas  (j) TSO's pre-emptive rights with operational rules and processes attached  (k) any storage capacity not available to TPA on the grounds of article 2(9) of the Gas Directive, with substantiated reasons  (l) all planned maintenance periods that might affect storage users' rights from storage contracts, at least once a year  (m) the operational information corresponding to planned maintenance periods with adequate advance notice  (n) regular updates on details, expected duration and effect of the maintenance  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)  Where users or more, but still commercial sensitivity of information  (c) reasons of cost (or substantial IT development needed)  (d) to avoid any potential market abuse  (e) to avoid significant harm to storage users commercial interest  (f) other (please specify below)	(h)						
rules and processes attached  (k) any storage capacity not available to TPA on the grounds of article 2(9) of the Gas Directive, with substantiated reasons  (l) all planned maintenance periods that might affect storage users' rights from storage contracts, at least once a year  (m) the operational information corresponding to planned maintenance periods with adequate advance notice  (n) regular updates on details, expected duration and effect of the maintenance  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)  (b) three users or more, but still commercial sensitivity of information  (c) reasons of cost (or substantial IT development needed)  (d) to avoid any potential market abuse  (e) to avoid significant harm to storage users commercial interest  (f) other (please specify below)	(i)	rules of ownership and use of working					
on the grounds of article 2(9) of the Gas Directive, with substantiated reasons  (I) all planned maintenance periods that might affect storage users' rights from storage contracts, at least once a year  (m) the operational information corresponding to planned maintenance periods with adequate advance notice  (n) regular updates on details, expected duration and effect of the maintenance  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)  (b) three users or more, but still commercial sensitivity of information  (c) reasons of cost (or substantial IT development needed)  (d) to avoid any potential market abuse  (e) to avoid significant harm to storage users commercial interest  (f) other (please specify below)	(j)						
might affect storage users' rights from storage contracts, at least once a year  (m) the operational information corresponding to planned maintenance periods with adequate advance notice  (n) regular updates on details, expected duration and effect of the maintenance  (n) 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)  (b) three users or more, but still commercial sensitivity of information  (c) reasons of cost (or substantial IT development needed)  (d) to avoid any potential market abuse  (e) to avoid significant harm to storage users commercial interest  (f) other (please specify below)	(k)	on the grounds of article 2(9) of the Gas					
to planned maintenance periods with adequate advance notice  (n) regular updates on details, expected duration and effect of the maintenance  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)  (b) three users or more, but still commercial sensitivity of information  (c) reasons of cost (or substantial IT development needed)  (d) to avoid any potential market abuse  (e) to avoid significant harm to storage users commercial interest  (f) other (please specify below)	(l)	might affect storage users' rights from					
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)  (b) three users or more, but still commercial sensitivity of information  (c) reasons of cost (or substantial IT development needed)  (d) to avoid any potential market abuse  (e) to avoid significant harm to storage users commercial interest  (f) other (please specify below)	(m)	to planned maintenance periods with					
(a) less than three users (information about the aggregate use of storage)       ☑         (b) three users or more, but still commercial sensitivity of information       ☐         (c) reasons of cost (or substantial IT development needed)       ☑         (d) to avoid any potential market abuse       ☐         (e) to avoid significant harm to storage users commercial interest       ☐         (f) other (please specify below)       ☐	(n)						
(b) three users or more, but still commercial sensitivity of information  (c) reasons of cost (or substantial IT development needed)  (d) to avoid any potential market abuse  (e) to avoid significant harm to storage users commercial interest  (f) other (please specify below)	Whe	re you have not published specific data,	please state	e why (rela	ating to GGF	PSSO 6.2., 6.3	3)
(c) reasons of cost (or substantial IT development needed)       Image: Comparison of cost (or substantial IT development needed)         (d) to avoid any potential market abuse       Image: Comparison of cost (or substantial IT development needed)         (e) to avoid significant harm to storage users commercial interest       Image: Comparison of cost (or substantial IT development needed)         (e) to avoid significant harm to storage users commercial interest       Image: Comparison of cost (or substantial IT development needed)         (f) other (please specify below)       Image: Comparison of cost (or substantial IT development needed)	(a)	less than three users (information about the	e aggregate	use of stora	age)		]
(d) to avoid any potential market abuse  (e) to avoid significant harm to storage users commercial interest  (f) other (please specify below)	(b)	three users or more, but still commercial se	ensitivity of ir	nformation			]
(e) to avoid significant harm to storage users commercial interest  (f) other (please specify below)	(c)	reasons of cost (or substantial IT developm	nent needed)	)			]
(f) other (please specify below)	(d)	to avoid any potential market abuse					]
1	(e)	to avoid significant harm to storage users of	commercial in	nterest			]
notes:	(f)	other (please specify below)					
		notes:					





frequency- basis, non-numerical data)? Please specify and jus GGPSSO 6.3)		
answer:		
Where unplanned disruptions in access to the storage se (GGPSSO 6.8):	ervices occur,	, do you ensu
(a) current system users are notified of that disruption as soon as	possible	
(b) information concerning the maintenance and disruptions that h made available upon request to those affected by the disruptio		S 🛚
Storage penalties		
		noncation navm
ls there a clause or provision in the storage contract/code prov the storage users in the event you fail to fulfil contractual oblig		
the storage users in the event you fail to fulfil contractual obligations answer: ja, durch das nationale Vertrags- und Schuldrecht  Secondary markets	ations (GGPS	
the storage users in the event you fail to fulfil contractual obligations answer: ja, durch das nationale Vertrags- und Schuldrecht  Secondary markets  Are registered users allowed to trade in the secondary market (	ations (GGPS	SO 8.1.a)?
the storage users in the event you fail to fulfil contractual oblig	ations (GGPS	
the storage users in the event you fail to fulfil contractual obligations answer: ja, durch das nationale Vertrags- und Schuldrecht  Secondary markets  Are registered users allowed to trade in the secondary market (  (a) bundled services only	(GGPSSO 9.1)	SO 8.1.a)?
the storage users in the event you fail to fulfil contractual obligations answer: ja, durch das nationale Vertrags- und Schuldrecht  Secondary markets  Are registered users allowed to trade in the secondary market ( (a) bundled services only (b) both bundled and unbundled services  Have you developed and used standardised contracts and present the properties of the secondary market ( (a) bundled and unbundled services	(GGPSSO 9.1)	SO 8.1.a)?
the storage users in the event you fail to fulfil contractual obligations answer: ja, durch das nationale Vertrags- und Schuldrecht  Secondary markets  Are registered users allowed to trade in the secondary market ( (a) bundled services only (b) both bundled and unbundled services  Have you developed and used standardised contracts and prefacilitate secondary trade of storage capacity (GGPSSO 9.1)?	(GGPSSO 9.1)	the primary ma
the storage users in the event you fail to fulfil contractual obligations answer: ja, durch das nationale Vertrags- und Schuldrecht  Secondary markets  Are registered users allowed to trade in the secondary market (  (a) bundled services only  (b) both bundled and unbundled services  Have you developed and used standardised contracts and prefacilitate secondary trade of storage capacity (GGPSSO 9.1)?  answer:  Is there a clause in the storage code/contract referring to	(GGPSSO 9.1)	the primary ma
the storage users in the event you fail to fulfil contractual obligations answer: ja, durch das nationale Vertrags- und Schuldrecht  Secondary markets  Are registered users allowed to trade in the secondary market ( (a) bundled services only (b) both bundled and unbundled services  Have you developed and used standardised contracts and prefacilitate secondary trade of storage capacity (GGPSSO 9.1)?  answer:  Is there a clause in the storage code/contract referring to capacity trading explicitly (relating to GGPSSO 9.1)?	(GGPSSO 9.1) rocedures on	the primary many many secondary





9.2

9.3

9.4

#### Implementation of the other GGPSSO requirements 9

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)			
(b)	offer short-term (<1 year) services down to a minimum period of one day (GGPSSO 3.3.c)			$\boxtimes$
(c)	offer both firm and interruptible storage services (GGPSSO 3.3.d)			$\boxtimes$
ntro ans	ere not already provided, please provide brief details on st oduction  wer:  ondary market – please indicate if you:	eps you pla	1 to take to fa	cilitate the
ntro ans	wer:	As of 1	Planned date of	Not
ntro ans	wer:		Planned	Not
anso Seco (a)	allow for title transfer for both bundled and unbundled	As of 1	Planned date of	Not applicable



### **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