

## **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>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

EREG 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. EREG 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 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 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: **ENAGAS S.A.**

1.2 Is access to your storage system provided:

(a) on a regulated basis	<input checked="" type="checkbox"/>
(b) on a negotiated basis	<input type="checkbox"/>
(c) both (please provide comments below)	<input type="checkbox"/>
notes:	

1.3 Is access provided:

(a) to a given storage facility	<input type="checkbox"/>
(b) to a group of storage facilities in the same balancing zone	<input checked="" 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: **All UGS are managed as a single one. This facilitates the management of the UGS services from the point of view of system users.**

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

answer: **13**

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 checked="" type="checkbox"/>
(b) if "yes", did you notify your relevant national regulatory authority (GGPSSO Scope and Objective)?	<input checked="" type="checkbox"/>

### GENERAL COMMENTS TO THE QUESTIONNAIRE:

- The answers to the questionnaire should have different weight factors depending on the significance of the question. Some issues are key for the market liberalisation and the compliance of the 2nd Gas Directive and the GGPSSO, whilst others have limited importance and a large amount of questions related. This should be taken into account in any future benchmarking; each question should have a weight factor.
- One of the main facts of the services provided by Enagas to the users is that any service requested is provided at the regulated price no matter the capacity and timing, whenever it is technically feasible. Economical constraints are not taken into account.
- Under the Spanish regulatory framework, the NRA is in charge of the development of methodologies, tariffs and services. For this reason, Enagas is another user of the information, tariffs and rules published by the NRA. Storage services provided by Enagas are only those included within regulatory framework and approved by NRA. There is no possibility of further developments without new regulation.

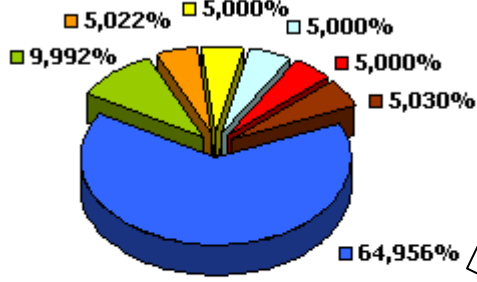
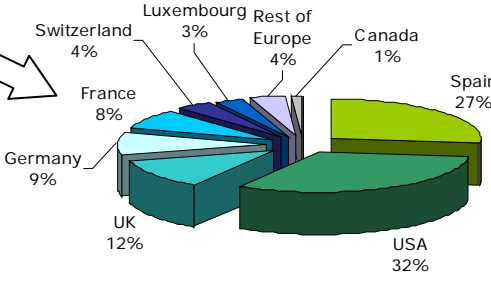
## 2 Roles and responsibilities of Storage System Operators

### 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)	<b>X</b>
(d) part of a vertically integrated company (i.e. unbundling of accounts)	<input type="checkbox"/>

None of the possible answers fully complies with the existing situation in Spain. Enagas is a mix between options a) and c) because it is an integrated operator (LNG, UGS and transmission) but has no presence in any other activity of the natural gas value chain, so it is not vertically integrated. Moreover Enagas is a case of “enhanced” ownership unbundling because is a 100% private company listed in the stock exchange and the equity share and voting rights of shareholders are both limited by law to 5%.

### 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.	
<p>Details: <b>Current Shareholding Structure</b></p>  <p><b>Free Float Composition</b></p>  <p>For more information, please visit this link:  <a href="http://www.enagas.es/enagas/website/principallngles.jsp?cnfjdbbc=jdbc_enagas_app.xml&amp;fvparentmenu=261089744590&amp;fvmenudefecto=261089744590">http://www.enagas.es/enagas/website/principallngles.jsp?cnfjdbbc=jdbc_enagas_app.xml&amp;fvparentmenu=261089744590&amp;fvmenudefecto=261089744590</a></p>	
(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).	<b>N/A</b>

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

(a) have developed and use standard storage contracts	<b>X</b>
(b) have developed and use a storage code (approved by national relevant regulatory authority)	<b>X</b>
(c) consulted users in developing the standard storage contracts or the storage code	<b>X</b>

Under the Spanish regulatory framework, the regulator is in charge of the development of methodologies, tariffs and services. For this reason, Enagas is another user of the information, tariffs and rules published by the regulator. The consultation process is driven by the regulator and Enagas applies the regulation approved as any other stakeholder.

A Network Code (Transmission, LNG, UGS and distribution), NGTS, was developed from 2000 to 2005 following a strong consensus in the industry. Consultation process was driven by the NRA and all stakeholders were involved in this process. The modification of the NGTS involves an open consultation process driven by the NRA. Regular meetings of several Working and Sub-working groups (all stakeholders are represented in these groups) are being held during the year.

**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 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	X
(e) other (please specify below)	X
notes: A Network Code (Transmission, LNG, UGS and distribution), NGTS, was developed from 2000 to 2005 following a strong consensus in the industry. Consultation process was driven by the NRA and all stakeholders were involved in this process. The modification of the NGTS involves an open consultation process driven by the NRA. Regular meetings of several Working and Sub-working groups (all stakeholders are represented in these groups) are being held during the year.	

**3 Necessary TPA services**

**3.1 Please provide the following data in normalised cubic meters (date of reference: ~~1 April 2005~~ 8 March 2006) (GGPSSO 3.1)**

	Space	Injectability	Deliverability
(a) technical capacity	2,366.26 M*	8.5 M / day	12.6 M / day
(b) available capacity	866.00 M**	Proportionally booked-total	Proportionally booked-total
(c) contracted or held capacity	1,500.26 M	Proportionally booked-total	Proportionally booked-total
(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>	NO	NO	NO
notes:			

<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

(e) any other capacity excluded from TPA – other than the portion used for production operations and facilities reserved exclusively for the TSO	NO	NO	NO
<p>notes:</p> <p>* Working volume in underground storage. LNG tanks and linepack not considered.</p> <p>** Includes 49 M under negotiation.</p> <p>The amount of available capacity varies during the year (depending on the month). Due to capacity requirements for the new injection/withdrawal cycle ("thermal period") most of the available capacity will be booked during March. At this moment we are not able to foresee how much capacity will still remain available but we can suppose that there will be a definite capacity to be contracted.</p>			

**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	X
(c) no PSO	<input type="checkbox"/>
(d) other	X
<p>notes: Gas system users are required to maintain (mainly in UGS), for security of supply purposes, a volume of gas equivalent to 35 days of their firm sales (suppliers) or firm consumption volumes (end-users).</p>	

**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)	X
---	---

**3.4 If any capacity needed for any PSO is NOT offered on a TPA basis, please state why:**

(a) national legislation	N/A
(b) other	N/A
<p>notes:</p>	

**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	N/A	N/A	N/A

**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	X
(b) a service which includes an obligation for the SSO to allocate the gas which has been nominated	X
(c) injection and withdrawal are possible at any time	X
<p>notes:</p>	

**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	X
<p>notes: service a) is provided within regulated tariff</p>	

**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:
--------------

**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)?	<b>X</b>
reasons for limitations: <b>Every service is provided at the regulated tariff, when technically feasible. Economical constraints are not taken into account.</b>	

**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 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	<b>X</b>
(e) other (please specify below)	<b>X</b>
details on consultation process: <b>Under the Spanish regulatory framework, the regulator is in charge of the development of methodologies, tariffs and services. For this reason, Enagas is another user of the information, tariffs and rules published by the regulator. The consultation process is driven by the regulator and Enagas applies the regulation approved as any other stakeholder.</b>	

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

	<i>Space</i>	<i>Injectability</i>	<i>Deliverability</i>
(a) bundled services (SBU) of space and injectability/deliverability	<b>no minimum</b>	<b>no minimum</b>	<b>no minimum</b>
(b) injection and withdrawal are possible at any time	<b>no minimum</b>	<b>no minimum</b>	<b>no minimum</b>

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

answer:	<b>N/A</b>
notes: <b>there is no minimum size requirement</b>	

**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	<i>no limit</i>
(b) other services	
notes: <b>Contracts available from 1 day to 20 years or more</b>	

**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:**

	<i>Email</i>	<i>Internet</i>	<i>Other</i>
(a) Nominations	<b>X</b>	<b>X</b>	<b>X</b>
(b) capacity bookings	<b>X</b>	<b>X</b>	<b>X</b>
(c) transfers of capacity rights between storage users	<b>(*)</b>		
(d) other	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
notes: <b>IT LOGISTIC SYSTEM SL-ATR (Internet based)</b> <b>(*)According to the national legislation, it is not yet possible to trade storage capacity in a secondary market. However, a secondary market for gas exchanges was developed in 2002 on a OTC basis and a trading platform (MS-ATR) was implemented by late 2005. A secondary market for storage capacity is under development by the NRA.</b>			

**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	<b>X</b>
(c) capacity follows the customer	<input type="checkbox"/>
(d) other ( <i>please specify below</i> )	<input type="checkbox"/>
notes:	

**4.2 Is the capacity allocation mechanism designed:**

(a) by the SSO	<input type="checkbox"/>
(b) by national legislation	<b>X</b>
(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 type="checkbox"/>
(b) bilateral contacts with all users and some prospects	<input 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	<b>X</b>
(e) other ( <i>please specify below</i> )	<b>X</b>
notes:	



Under the Spanish regulatory framework, the regulator is in charge of the development of methodologies, tariffs and services. For this reason, Enagas is another user of the information, tariffs and rules published by the regulator. The consultation process is driven by the regulator and Enagas applies the regulation approved as any other stakeholder.

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

**4.6 The congestion management mechanism:**

(a) has it ever been used?	<input checked="" 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 type="checkbox"/>
notes: Although interruptible services are not offered as such, unused day ahead injection and withdrawal capacity is made available to storage users on a firm basis (it could be argued that this mechanism is equivalent to an interruptible service, since the injection / withdrawal tariff is made up of a single variable term which reflects the cost of the injection / withdrawal service).	

**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: Use it or lose it, including bails	

## 5 Confidentiality requirements

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

(a) keep databases related to storage operations separate	<input type="checkbox"/>
(b) develop new IT systems for the storage business separately (when new IT systems are being developed in vertically integrated undertakings)	<input 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	<input type="checkbox"/>
(e) have implemented a compliance programme, supervised by a Compliance Officer	<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 checked="" type="checkbox"/>
(b) another relevant national regulatory authority (please specify)	<input type="checkbox"/>
(c) external audit	<input 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:	N/A
---------	-----

Enagas is not a vertically integrated undertaking as it only carries out transport activities. Moreover Enagas is a case of enhanced ownership unbundling because is a 100% private company listed in the stock exchange and the equity share and voting rights of shareholders are both limited to 5%. For these reasons, further measures are not necessary to ensure confidentiality.

## 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	X	X	X	X	<input type="checkbox"/>
(b) if nTPA: main commercial conditions including the prices for standard services	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	X
(c) If nTPA: 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"/>	X
(d) services offered	X	X	X	X	<input type="checkbox"/>
(e) storage code	X	<input type="checkbox"/>	X	X	<input type="checkbox"/>
(f) main storage standard conditions for each service	X	X	X	X	<input type="checkbox"/>
(g) rights and responsibilities of all users	X	X	X	X	<input type="checkbox"/>
(h) rules (e.g. periods) for counter flows during injection and withdrawal	X	<input type="checkbox"/>	X	X	<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"/>	X
(j) storage capacity allocation provisions	X	X	X	X	<input type="checkbox"/>
(k) congestion management provisions	X	<input type="checkbox"/>	X	X	<input type="checkbox"/>
(l) anti-hoarding provisions	X	X	X	X	<input type="checkbox"/>
(m) re-utilisation provisions	X	<input type="checkbox"/>	X	X	<input type="checkbox"/>
(n) auction terms (where applicable)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	X
(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"/>	X
(p) rules and charges applicable to storage penalties from storage users	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	X
(q) compensation payments from the SSO to storage users	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	X
(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"/>	X

(\*) For English translations of documents/legislation please visit <http://www.cne.es/>.

### 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	X	X	X	X	X
(b) available storage capacity	X	X	X	X	X
(c) contracted or held storage capacity	X	X	X	X	X

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

### 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 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 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)	X
notes: <b>All the data required by existing regulation are published.</b>	

- 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: **All the data required by existing regulation are published.**

- 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	<b>X</b>
(b) information concerning the maintenance and disruptions that have occurred is made available upon request to those affected by the disruption	<b>X</b>

## 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: **There are no penalties stated in the national regulation, either for the operator or the user, but both parties are subject to the legal responsibilities if they fail to fulfil their contractual obligations.**

## 8 Secondary markets

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

(a) bundled services only	<b>N/A</b>
(b) both bundled and unbundled services	<b>N/A</b>

- 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:	<b>N/A</b>
---------	------------

- 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:	<b>N/A</b>
---------	------------

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

answer:	<b>N/A</b>
---------	------------

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

answer:
---------

**According to the national legislation, it is not yet possible to trade storage capacity in a secondary market. However, a secondary market for gas exchanges was developed in 2002 on a OTC basis and a trading platform (MS-ATR) was implemented by late 2005. A secondary market for storage capacity is under development by the NRA.**

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

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

answer: **Although unbundled & interruptible services are not offered as such, unused day ahead injection and withdrawal capacity is made available to storage users on a firm basis (it could be argued that this mechanism is equivalent to an interruptible service, since the injection / withdrawal tariff is made up of a single variable term which reflects the cost of the injection / withdrawal service).**

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

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

answer: **According to the national legislation, it is not yet possible to trade storage capacity in a secondary market. However, a secondary market for gas exchanges was developed in 2002 on a OTC basis and a trading platform (MS-ATR) was implemented by late 2005. A secondary market for storage capacity is under development by the NRA.**

## ***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