

# Existing transparency requirements for natural gas

# **Public Consultation**

E10-GWG-68-03

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Council of European Energy Regulators ASBL 28 rue le Titien, 1000 Bruxelles Arrondissement judiciaire de Bruxelles RPM 0861.035.445



#### **INFORMATION PAGE**

#### **Abstract**

On 1 October 2010 ERGEG has launched a public consultation on existing transparency requirements for natural gas. It outlines the existing legally binding, soon-to-be legally binding and voluntary transparency requirements in natural gas to evaluate the markets need for additional transparency requirements.

# **Target Audience**

Energy suppliers, traders, gas/electricity customers, gas/electricity industry, consumer representative groups, network operators, Member States, academics and other interested parties.

If you have any queries relating to this paper please contact:

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### How to respond to this consultation

Deadline: 26 November 2010

Comments should be sent by e-mail to gastransparency@ergeg.org

If you have any queries relating to this consultation paper please contact:

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All responses except confidential material will be published on the website www.energy-regulators.eu.



## **Treatment of Confidential Responses**

In the interest of transparency, ERGEG

- i) will list the names of all respondents (whether confidential or not) or, alternatively, make public the number (but not the names) of confidential responses received;
- requests that any respondent requesting confidentiality submit those confidential aspects of their response in a "confidential appendix". ERGEG will publish all parts of responses that are not marked confidential.

For further information on ERGEG's rules, see ERGEG Guidelines on Consultation Practices.

#### **Related Documents**

#### CEER/ERGEG documents

- "Guidelines of Good Practice for Third Party Access for LNG System Operators" (GGP LNG), ERGEG, May 2008, Ref. E08-LNG-06-03
- "Guidelines of Good Practice for Third-Party Access for Storage System Operators" (GGP SSO), ERGEG, March 2005, E04-PC-01-14
- "Final pilot framework guideline on capacity allocation on European Gas Transmission networks", ERGEG, June 2010, Ref. E10-GWG-66-03,

#### External documents

- Regulation (EC) No 715/2009 of the European Parliament and of the Council of 13 July 2009 on conditions for access to the natural gas transmission networks and repealing Regulation (EC) No 1775/2005
- Directive 2009/73/EC of the European Parliament and of the Council of 13 July 2009 concerning common rules for the internal market in natural gas and repealing Directive 2003/55/EC



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## 1 Background

Transparency is an essential pre-requirement for a functioning internal energy market and underpins the development of effective and efficient market functioning. The 3<sup>rd</sup> Package brought several new transparency requirements for natural gas. Furthermore, the Gas Comitology Committee agreed on a revision of Chapter 3 of Annex 1 of Regulation (EC) 715/2009 which is currently being commented by the European Parliament.

At the current stage legally binding transparency requirements are most detailed for transmission systems. Some basic transparency requirements for LNG and storage facilities are currently covered by the 3<sup>rd</sup> Package and in ERGEG Guidelines for Good Practice (GGP). Additionally the 3<sup>rd</sup> Package offers the possibility to develop comitology guidelines for storage and LNG transparency as well.

European Energy Regulators prepared several documents outlining the regulators' views on transparency in natural gas and consulted these also publicly in the past.

On 28 May 2010 the European Commission has invited ERGEG to prepare a draft guideline on fundamental gas transparency as for electricity. To evaluate the market need for further transparency requirements – exceeding the legally binding transparency requirements in Regulation (EC) 715/2009 and Directive 2009/73/EC – European Energy Regulators compiled a list of all existing transparency requirements and invites all interested parties to provide comments to the consultation paper - and in particular the questions below.

#### 2 Questions for stakeholders

Please feel free to justify your answers and to submit further observations not directly related to the questions below. Furthermore, please indicate if you are answer concerns transparency regarding gas transmission, LNG, gas storage or gas production.

- Do the existing legally binding and soon-to-be legally binding transparency requirements for transmission, LNG and storage satisfy your needs as a market participant? In case your answer is no, please specify what is missing in your view and why.
- Are you satisfied with the current level of transparency provided for by system operators? In case
  your answer is no, please specify whether this is the case due to the lack of transparency
  requirements or the quality of publication.
- Do the existing voluntary GGP for LNG System Operators<sup>1</sup> and GGP for Third Party Access for Storage System Operators<sup>2</sup> satisfy your needs as a market participant?

<sup>&</sup>lt;sup>1</sup> Ref. E08-LNG-06-03 (May 2008)

<sup>&</sup>lt;sup>2</sup> Ref. E04-PC-01-04 (March 2005)



- Do you think that those transparency requirements in the GGP LNG and GGP SSO which are not covered by the 3<sup>rd</sup> Package should become legally binding?
- Do you think that the voluntary GGP for LNG System Operators and GGP for Third Party Access for Storage System Operators shall include further transparency requirements? In case your answer is yes, please specify what is missing in your view.
- Is there an area along the gas value chain (production, transmission, LNG, storage, distribution, wholesale market) where in your view additional transparency requirements are needed? Please specify what you miss in your answer.
- Do you think that further transparency is required for the production (upstream) sector? If your answer is yes, please specify what is missing in your view, and what specific additional transparency requirements you would want to see? If your answer is no, please explain why.

# 3 Existing legally binding transparency requirements

Required information	Timeframe	Reference				
Transmission						
Detailed information regarding the services offered and the relevant conditions applied, together with the technical information necessary for network users to gain effective network access.		Article 18	Regulation (EC) 715/2009			
Reasonably and sufficiently detailed information on tariff derivation, methodology and structure.		8	on (EC)			
For the services provided information on technical, contracted and available capacities on a numerical basis.	regular and rolling basis					715/20
The relevant points shall be approved by the competent authorities after consultation with network users.			09			
Disclosure of information in a meaningful, quantifiably clear and easily accessible manner and on a non-discriminatory basis.						
Ex-ante and ex-post supply and demand information, based on nominations, forecasts and realised flows in and out of the system.						
The level of detail of the information that is made public shall reflect the information available to the TSO.						
Measures taken as well as costs incurred and revenue generated to balance the system.						
Market participants concerned shall provide the TSO with the data referred to in this Article.						



Required information	Timeframe	Ref	erence		
Form of publication:		3.1.1.	Draf Reg		
on a website accessible to the public, free of charge and without any need to register or otherwise sign on with the TSO;			t Comn ulation		
on a regular/rolling basis; the frequency shall be according to the changes that take place and the duration of the service;			nission (EC) 7		
in a user-friendly manner;			decii 15/20		
in a clear, quantifiable, easily accessible way and on a non- discriminatory basis;			sion on )09		
in downloadable format that allows for quantitative analyses;			Rev		
in consistent units, in particular kWh shall be the unit for energy content and m³ shall be the unit for volume;			Draft Commission decision on Revision of Annex 1 Chapter 3 Regulation (EC) 715/2009		
The constant conversion factor to energy content shall be provided. In addition to the format above, publication in other units is also possible;				Annex	
in the official language(s) of the Member State and in English;					1 0
Details on actual changes to all information in a timely manner as soon as available to TSOs;			hapter 3		
A detailed and comprehensive description of the different services offered and their charges;	Once Details on	3.1.2.	ω		
The different types of transportation contracts available for these services;	actual changes in a				
The network code and/or the standard conditions outlining the rights and responsibilities of all network users including:	timely manner as soon as available to				
1. harmonised transportation contracts and other relevant documents;	TSOs				
2. if relevant for access to the system, for all relevant points, a specification of relevant gas quality parameters, including at least the GCV and the Wobbe index, and the liability or costs of conversion for network users in case gas is outside these specifications;					
3. if relevant for access to the system, for all relevant points information on pressure requirements;					
4. the procedure in the event of an interruption of interruptible capacity, including, where applicable, the timing, extent, and ranking of individual interruptions (for example pro-rata or FCFI).					
Harmonized procedures applied when using the system, including the definition of key terms;					
Provisions on CAM, CMP and anti-hoarding and re-utilisation procedures;					



Required information	Timeframe	Reference
Rules applicable for capacity trade on the secondary market vis-à-vis the TSO;		
Rules on balancing and methodology for the calculation of imbalance charges;		
If applicable, the flexibility and tolerance levels included in transportation and other services without separate charge, as well as any flexibility offered in addition to this and the corresponding charges;	_	
Detailed description of the system and its relevant points of interconnection as well as the names of the operators of the interconnected systems or facilities;		
Rules applicable for connection to the system operated by the TSO;		
Information on emergency mechanisms, as far as it is the responsibility of the TSO, such as measures that can lead to the disconnection of customers groups and other general liability rules that apply to the TSO;		
Procedures agreed upon by TSOs at IPs, of relevance for access of network users to the systems concerned, relating to interoperability of the network, agreed procedures on nomination and matching procedures and other agreed procedures that set out provisions in relation to gas flow allocations and balancing, including the methods used;		
Detailed and comprehensive description of the methodology and process, including information on the parameters employed and the key assumptions, used to calculate the technical capacity.		
Relevant points shall include at least:		3.2
(a) all entry and exit points to and from a transmission network, with the exception of exit points connected to a single final customer, and with the exception of entry points linked directly to a production facility of a single producer that is located within the EU;		
(b) all entry and exit points connecting balancing zones of TSOs;		
(c) all points connecting the network of a TSO with an LNG terminal, physical gas hubs, storage and production facilities, unless these production facilities are exempted under a)		
(d) all points connecting the network of a given TSO to infrastructure necessary for providing ancillary services.		



Required information	Timeframe	Reference
Information for single final customers and for production facilities that is excluded from the definition of relevant points shall be published in aggregate format, at least per balancing zone. The aggregation of single final customers and of production facilities, excluded from the definition of relevant points, shall be considered as one relevant point.		
Where points between two or more TSOs are managed solely by the TSOs concerned, with no contractual or operational involvement of system users whatsoever, or where points connect a transmission system to a distribution system and there is no contractual congestion at these points, TSOs shall be exempted for these points from the obligation to publish the requirements under paragraph 3.3 of this Annex.		
The NRA may require the TSO to publish the requirements under paragraph 3.3 of this Annex for groups or all of the exempted points. In such case, the information, if available to the TSO, shall be published in an aggregated form at a meaningful level, at least per balancing zone. This aggregation of these points shall be considered as one relevant point.		
Information as listed in paragraphs (a) to (g), for all services and ancillary services provided. This information shall be published on a numerical basis, in hourly or daily periods, equal to the smallest reference period for capacity booking and (re-)nomination and the smallest settlement period for which imbalance charges are calculated. If the smallest reference period is different from a daily period, information as listed in paragraph (a) to (g) shall be made available also for the daily period. This information and updates shall be published as soon as available to the TSO.	Near real time	3.3.
(a) The technical capacity for flows in both directions;	Near real time	
<ul><li>(b) The total contracted firm and interruptible capacity in both directions;</li><li>(d) The available firm and interruptible capacity in both directions;</li></ul>	at least 18 months ahead and	
(a) The available initi and interruptible capacity in both directions;	past five years on a rolling basis	
(c) The nominations and re-nominations in both directions;	Near real time	
	past five years	
(e) Actual physical flows;	on a rolling basis	
(f) Planned and actual interruption of interruptible capacity;	past five vears	



Required information	Timeframe	Reference	
(g) Planned and unplanned interruptions to firm services as well as the information on restoration of the firm services (a.o. maintenance of the system and the likely duration of any interruption due to maintenance).			
Planned interruptions shall be published at least 42 days in advance.			
Measured values of the GCV or the Wobbe Index at all relevant points. Preliminary figures shall be published at the latest three days following the respective gas day. Final figures shall be published within three months after the end of the respective month.	Daily basis		
Available capacities, booked and technical capacities, on an annual basis over all years where capacity is contracted plus one year, and at least for the next 10 years. This information shall be updated at least every month or more frequently, if new information becomes available. The publication shall reflect the period for which capacity is offered to the market.	Annual basis		
Aggregated amounts of capacities offered, and contracted on the secondary market (i.e. sold from one network user to another network user), where the information is available to the TSO.	daily basis and updated every day	3.4.	
This information shall include the following specifications:			
a) interconnection point where the capacity is sold;			
b) type of capacity, i.e. entry, exit, firm, interruptible;			
c) quantity and duration of the capacity usage rights;			
d) type of sale, e.g. transfer or assignment;			
e) the total number of trades/transfers;			
f) any other conditions known to the TSO as mentioned in 3.3.			
In so far such information is provided by a third party, TSOs shall be exempted from his provision.			



Required information	Timeframe	Reference
Harmonised conditions under which capacity transactions (e.g. transfers and assignments) will be accepted by them. These conditions must at least include:	Once Details on actual	
a) A description of standardised products which can be sold on the secondary market;	changes to all information in	
b) Lead time for the implementation/acceptation/registration of secondary trades. In case of delays the reasons have to be published;	a timely manner as	
c) The notification to the TSO by the seller or the third party as referred to under 3.4(1) about name of seller and buyer and capacity specifications as outlined in 3.4(1).	available to TSOs.	
In so far such information is provided by a third party, TSOs shall be exempted from this provision.		
To each network user, for each balancing period, its specific preliminary imbalance volumes and cost data per individual network user. Final data of customers supplied according to standardised load profiles may be provided up to 14 months later.	At latest one month after the end of the balancing	
In so far such information is provided by a third party, TSOs shall be exempted from his provision. The provision of this information shall respect confidentiality of commercially sensitive information.	period	
Where flexibility services, other than tolerances, are offered for TPA, TSOs shall publish daily forecasts of the maximum amount of flexibility, the booked level of flexibility and the availability of flexibility for the market.	Day-ahead basis for the next gas day	
The TSO shall also publish ex-post information on the aggregate utilisation of every flexibility service. If the NRA is satisfied that such information could give room to potential abuse by network users, it may decide to exempt the TSO from this obligation.	at the end of each gas day	
Per balancing zone, the amount of gas in the system at the start of each gas day and the forecast of the amount of gas in the system at	Updated on an hourly basis	
the end of each gas day. The forecast amount of gas for the end of the gas day.	hourly basis	
If imbalance charges are calculated on an hourly basis, the TSO shall publish the amount of gas in the system.		
Alternative: Per balancing zone, the aggregate imbalance position of all users at the start of each balancing period and the forecast of the aggregated imbalance position of all users at the end of each gas day. If the NRA is satisfied that such information could give room to potential abuse by network users, it may decide to exempt the TSO from this obligation.		



Required information	Timeframe	Reference	
User-friendly instruments for calculating tariffs.	Once		
Effective records of all capacity contracts and all other relevant information in relation to calculating and providing access to available capacities, in particular individual nominations and interruptions shall be kept at the disposal of the relevant national authorities.	at least for five years		
Documentation of all relevant information under point 3.3.(4) and (5) and make them available to the NRA upon request. Both parties shall respect commercial confidentiality.			

LNG and Storage				
Relevant information, in particular data on the use and availability of services, subject to the monitoring of such publication by the NRA.	time-frame compatible with the users' reasonable commercial needs	Article 15 1. (c)	Regulation (EC) 715/2009	
Non-discriminatory and transparent capacity-allocation mechanisms which shall		Article	Regu	
(a) provide appropriate economic signals for the efficient and maximum use if capacity and facilitate investment in new infrastructure;		e 17 2.	Regulation (EC) 715/2009	
(b) be compatible with the market mechanism including spot markets and trading hubs, while being flexible and capable of adapting to evolving market circumstances; and			715/2009	
(c) be compatible with the connected network access systems.				
Detailed information regarding the services offered and the relevant conditions applied, together with the technical information necessary for users to gain effective access to the facilities.		Article 19		Regulation (EC 715/2009
For the services provided information on contracted and available capacities on a numerical basis and in a user-friendly standardised manner.	regular and rolling basis		on (EC)	
Disclosure of information in a meaningful, quantifiably clear and easily accessible way and on a non-discriminatory basis.				



Required information	Timeframe	Ref	erence
Amount of gas in each system, or group of storage facilities if that corresponds to the way in which the access is offered to system users, inflows and outflows, and the available capacities, including for those facilities exempted from TPA.	updated at least daily		
That information shall also be communicated to the TSO, which shall make it public on an aggregated level per system or subsystem defined by the relevant points.			
LSO, SSO or relevant NRA shall publish sufficiently detailed information on tariff deviation, the methodologies and the structures of tariffs for infrastructure under regulated TPA.			
The NRAs where Member States have so provided or Member States shall define and publish criteria according to which the access regime applicable to storage facilities and linepack may be determined. They shall make public, or oblige SSOs or TSOs to make public, which storage facilities, or which parts of those storage facilities, and which linepack is offered under the different procedures referred to in Article 33 paragraphs 3 and 4.		Article 33	Directive 2009/73/EC
Contracts for access to storage, linepack and other ancillary services shall be negotiated with the relevant SSO or natural gas undertakings. The NRAs where Member States have so provided or Member States shall require SSPs and natural gas undertakings to publish their main commercial conditions for the use of storage, linepack and other ancillary services by 1 January 2005 and on an annual basis every year thereafter.			

# 4 Non-binding existing transparency requirements

Required information	Timeframe	Reference	
Transmission			
The network code shall define standard communication procedures that are applied by TSOs to exchange information with network users. Coordinated information systems [] shall be utilised particularly for capacity booking and transfers of capacity rights between network users.		E10-GWG-66-	CAM on Europe Transmission No Pilot Framework Guideline
The network code shall require that TSOs publish the detailed [capacity allocation] procedure as well as the capacity offered, its lead time and its duration.	sufficiently in advance	03	ean Gas Jetworks - k
Liquefied Natural Gas Systems			



Required information	Timeframe	Refe	rence																				
Terminal Code describing all applicable rules and procedures, in particular the provisions required by the GGPLNG; this includes at least: The main standard conditions for each service outlining the rights and responsibilities of the LSO and every terminal user, capacity allocation mechanisms, congestion management and reutilization provisions, auction terms (where applicable) and rules applicable for capacity trade on the secondary market, standard procedures for measuring LNG volumes consigned at the LNG facility and gas redelivered to the network, the ship approval and gas quality requirements.				E08-LNG-06-03	GGP for TPA for LNG System Operators																		
Maps indicating the location of its LNG facility, a description of its infrastructures and the connection points of the LNG facility with downstream infrastructure.			Operator																				
Cooperation/coordination agreements with other operators;			o,																				
Standard service contracts and other relevant documents;																							
Appropriate instruments to make bookings on a short-term basis;																							
Terminal users shall be advised about the type of circumstances that could affect the availability of contracted capacity. The potential risks that could affect the level of firmness of firm capacity rights shall be identified and made public for the users. The determinants of interruption of interruptible services must also be described.	Once and in case of proposed and actual																						
Tariffs and tariff methodologies for each service offered shall be published ex ante; the tariff methodology specifying the overall regulatory involvement in tariff setting and including, subject to the NRA's decision, inter alia, the definition of the regulatory asset base, the asset valuation, the depreciation principles applied, the methodology followed to calculate the rate of return and current value, the incentive schemes, the indexation of tariffs or principles for tariff variations;	changes																						
If applicable, the rules and the charges applicable to penalties from terminal users and compensation payments from the LSO to terminal users;																							
User-friendly instruments for calculating charges for a specific service (e.g. a tariff calculator);																							
Scheduling procedures for cargoes unloading. These should include at least the contractually binding notice periods for using the services (scheduling program, (re)nominations) and the priority rules in case of conflicting nominations by capacity holders.																							
Calculation methodology of available capacities.																							



Required information	Timeframe	Reference
Existing and future LNG terminal capacity, including the operation starting date for the new capacities, and contracted and available LNG facility capacity (firm and interruptible when applicable) for the services provided. This information must be provided on a numerical basis, separately for the different services referred to in § 10. Also they shall make public the amount of gas in storage, inflows and outflows.	Update at least every day	
Updated maintenance plans.	Maximum for one year Update prompt in case of changes	
The evolution of the contracted capacity, this information should take into account the expiry date of all contracts.	Until expiry of the last contract Update each time a service of more than one month's duration is contracted;	
Short-term available capacity and/or spot services;	Update with the appropriate periodicity	
Historical maximum and minimum monthly capacity utilisation rates and annual average flows;	Per month Year Y for Y- 3 until Y-1 on a rolling basis until preceding month	
Relevant data, in particular data on the use and availability of services.	Time-frame compatible with the users' reasonable commercial needs	



Required information	Timeframe	Refe	rence						
Storage Facilities									
SSOs should implement user-friendly systems to make public information in a timely manner in national language and in English on the Internet. Information shall be disclosed in a meaningful, quantitatively clear and easily accessible way and on a non-discriminatory basis.		E04-PC-01-14	E04-PC-01-14	E04-PC-01-14	E04-PC-01-14	E04-PC-01-14	E04-PC-01-14	E04-PC-01-14	GGP for TPA to
Non-confidential information must be provided on a non discriminatory basis. User(s) may request the SSO not to publish information about the aggregate use of storage if such publication would harm the commercial interest of user(s). In cases of non-publication, the relevant NRA will, when requested by relevant parties, review the decision not to publish. In doing so it will balance the commercial sensitivity of information against the public interest for transparency. If it considers that the reasons for non-publication are not proportionate, are unfair, or discriminatory, the relevant national regulatory authority can require that the SSO publishes the information. In any respect, information should always be published by the SSO when three or more storage users have been allocated capacity by virtue of contractual or any other similar arrangements, excluding the portion used for production operations, and excluding capacities reserved exclusively for transmission system operators in carrying out their functions.	Promptly and on the same time scale to all users		GGP for TPA for Storage System Operators						
Notify the relevant NRA, where the SSO does not published specific data. The relevant NRA can require further details from the SSO, including substantiated reasons, for non-publication. If the reasons for non-publication are not proportionate, are unfair, or discriminatory, the relevant NRA can require that the SSO publishes the information. In any case, according to article 19 (3) of the Gas Directive 2003/55/EC, the main commercial conditions are to be published. In case of non publication, the information should be made available to the relevant NRA upon its request.	Without any unreasonable delay								
In rTPA, the tariffs and tariff methodologies for each service offered shall be published ex ante. In nTPA, the main commercial conditions including the prices for standard services; prices and underlying criteria (if applicable) should be made available to the relevant NRA at least in case of disputes;	rTPA: ex ante nTPA: once and in case of proposed and actual changes								
	update in an appropriate timely fashion								



Required information	Timeframe	Reference
Services offered, the storage code (if applicable), the main storage standard conditions for each service outlining the rights and responsibilities of all users (including rules for counter flows during injection or withdrawal and the rules (if any) of storage capacity transfer in case of customer switching);		
Storage capacity allocation, congestion management and anti- hoarding and reutilization provisions, auction terms where applicable and rules applicable for storage capacity trade on the secondary market vis-à-vis the SSO;		
The rules and the charges applicable to storage penalties from storage users and compensation payments from the SSO to storage users.		
For a given storage facility or a group of storage facilities in the same balancing zone where access is provided to this group, via an online information system (in energy units or normal cubic meters, according to interoperability criteria) to provide system users with sufficient and timely information in order to gain effective and efficient access to storage facilities:	Once and in case of proposed and actual changes update in an	
(a) User-friendly instruments for calculating charges for a specific service (e.g. a tariff calculator) and for verifying online the level of available and/or unused storage capacity;	appropriate timely fashion	
(b) Maps indicating the location of their storage facilities and the connecting points of the storage facilities to the relevant network;		
(c) The rules (if any) of transfer of storage capacity and injection and withdrawal capacity in case of customer switching.		
The method of determining available storage capacity and the operational parameters, including the rules of ownership and use of working gas;		
TSO's pre-emptive rights with operational rules and processes attached;		
Any storage capacity not available to TPA on the grounds of Article 2 (9) of the Gas Directive 2003/55/EC with substantiated reasons.		
For a given storage facility or a group of storage facilities in the same balancing zone where access is provided to this group, via an online information system (in energy units or normal cubic meters, according to interoperability criteria) to provide system users with sufficient and timely information in order to gain effective and efficient access to storage facilities:	timely manner	
(a) Technical, available and contracted or held storage capacity (firm	update in an appropriate	



Required information	Timeframe	Reference	
and interruptible where applicable);			
(b) For each storage site or group of storage facilities, aggregated inflows and outflows and historical utilization rates at least on a weekly basis for the immediately preceding week			
All planned maintenance periods that might affect storage users' ights from storage contracts and the corresponding operational	Maximum per year		
information with adequate advance notice. During maintenance periods, the SSO shall regularly publish updated information on details, expected duration and effect of the maintenance. The SSO shall maintain and make available upon request to the relevant NRA and/or to those affected by any disruption information concerning the maintenance and disruptions that have occurred.	At least once a year, by a predetermine d deadline; changes with adequate advance notice; unplanned disruptions as soon as possible;		
	Regularly updates during maintenance		
Information on stock levels in each storage facility, aggregate inflows and aggregate outflows and percentage of capacity available per SSO or aggregated by all of the hubs	Per day		
	Day D for D-		