

## **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

<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



storage users will be particularly important in assessing implementation of the GGPSSO.

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

<b>O</b> C.	neral			
Bus	iness name of respondent: S.C. DEPOMUREŞ S.A. TG. MUREŞ			
s a	ccess to your storage system provided:			
(a)	on a regulated basis			
(b)	on a negotiated basis			
(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			
(c)	otner (please provide comments below)			
. ,	notes:  sswer that access is provided to a given storage facility/to a group of storage, please	e assume tha		
u an	notes:  aswer that access is provided to a given storage facility/to a group of storage, please following answers will be interpreted accordingly  access to storage is not provided to individual storage facilities, please providing groups, how many sites within group) and specify how this is arranged:			
u an	notes:  aswer 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:			
u an	notes:  aswer 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:  many system users own capacity rights (date of reference: 1 April 2005)?			
f acman	notes:  aswer 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:			
f acman	notes:  aswer 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:  many system users own capacity rights (date of reference: 1 April 2005)?			
u ar	notes:  aswer 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:  many system users own capacity rights (date of reference: 1 April 2005)?			





# 2 Roles and responsibilities of Storage System Operators

(a)	a separate entity (i.e. ownership unbundling)	
(b)	a separate entity (i.e. legal unbundling)	$\boxtimes$
(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)	
(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:	
(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).	
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
Pleacont (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	
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	
Pleasont (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	bility	Deliverability
(a)	technical capacity	300.000.000	277.000	0.000	260.000.000
(b)	available capacity	250.000.000	250.000	0.000	250.000.000
(c)	contracted or held capacity	57.000.000	-		57.000.000
(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				
	notes:				
(a)	4h - 000				
(a)					
(h)	the SSO the shippers				
	the shippers				
(c)	the shippers no PSO				
(c)	the shippers no PSO other				
(c)	the shippers no PSO				
(c) (d)	the shippers no PSO other				
(c) (d)	the shippers no PSO other notes:	A basis? (GGPS	SO 3.2)		
(c) (d) Capa (a)	the shippers no PSO other notes: acity for Public Service Obligations (hereafter PSO): is storage capacity needed for any PSO offered on a TP/	•		hy:	
(c) (d) Capa (a)	the shippers no PSO other notes: acity for Public Service Obligations (hereafter PSO):	•		hy:	
(c) (d) (a) (a)	the shippers no PSO other notes: acity for Public Service Obligations (hereafter PSO): is storage capacity needed for any PSO offered on a TP/	•		hy:	

<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



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		Space	Injectabili	ty Deliverability
(a) n	ormalised cubic meters			
ο γοι	u offer the following services on the primary mark	ket (GGPSSO 3.3	, 3.5, 3.7):	
(a) b	undled services (SBU) of space and injectability/deliv	verability		$\boxtimes$
	service which includes an obligation for the SSO to a een nominated	allocate the gas w	hich has	
c) ir	jection and withdrawal are possible at any time			
n	otes:			
re th	e following services separately charged (GGPSS)	O 3.3., 3.5, 3.7)?		
	service which includes an obligation for the SSO to a een nominated	allocate the gas w	hich has	$\boxtimes$
(b) ir	jection and withdrawal are possible at any time			
n	otes:			
Vhere	some services have NOT been introduced, pleas	se state why (GG	PSSO 3.4.b,	3.5, 3.6, 3.7):
Obliga	ation for the SSO to allocate according to nominations	s		
(a)	consistent with the use of the interconnected gas to	ransmission syste	em	
(b)	not compatible with the balancing regime of the int transportation system	erconnected gas		
Injecti	on and withdrawal possible at any time			
,	storage technical constraints			$\boxtimes$
(c)	0			
	economically use of the storage infrastructure			Ш
(c)	<del>-</del>	ransmission syste	em .	
(c)	economically use of the storage infrastructure	ransmission syste	em	
(c) (d) (e) (f)	economically use of the storage infrastructure  consistent with the use of the interconnected gas to not consistent with PSOs  of these services (please specify) has not been why	· · · · · · · · · · · · · · · · · · ·		reason, please
(c) (d) (e) (f)	economically use of the storage infrastructure  consistent with the use of the interconnected gas to not consistent with PSOs  of these services (please specify) has not been	· · · · · · · · · · · · · · · · · · ·		reason, please
(c) (d) (e) (f)  f any explain explain	economically use of the storage infrastructure  consistent with the use of the interconnected gas to not consistent with PSOs  of these services (please specify) has not been why	en introduced fo	or any other	
(c) (d) (e) (f)  f any explain explain	economically use of the storage infrastructure consistent with the use of the interconnected gas to not consistent with PSOs  of these services (please specify) has not been why anation:  there are limitations on the offer of services	en introduced for on the ground	or any other	



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3.11	Please indicate if services offered have been developed with into account market demand. If "yes", please provide details conducted (GGPSSO 3.4.a)						
	(a) bilateral contacts with some users				$\boxtimes$		
	(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)	ement (e.g. o	n				
	(d) consultation process supervised by relevant national regulator	ry authority					
	(e) other (please specify below)						
	details on consultation process:						
3.12	Please specify the minimum size for each service (GGPSSO 3.	_	Inicato	hilita i	Dolivershility		
	(a) bundled services (SBU) of space and injectability/deliverability	Space	mjecia	Dility	Deliverability		
	(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	ercome	poter	ntial capacity		
	answer:						
	notes: no						
3.14	Please specify the maximum duration for each service offered	by your SS	O (GGF	esso	3.3.c)		
	(a) bundled services (SBU) of space and injectability/deliverabilit	У			1 year		
	(b) other services						
	notes:						
3.15	Please specify if you have developed information systems provide adequate data to storage users and to simplify transactions.	ctions such	as:				
	(a) nominations	Email ⊠		ernet ⊠	Other		
	(b) capacity bookings		<u> </u>	<u></u>			
	(c) transfers of capacity rights between storage users			<u>-</u> 1			
	(d) other			<u>-</u> 1			
4 4.1	Storage capacity allocation and congestion management what kind of capacity allocation mechanism do you apply (se applied different, depending on the storage facility/group of st	veral answe					
	(a) market-based (e.g. auctions)	- 9	, . (				
	(b) first come first served						
	(c) capacity follows the customer						
	(d) other (please specify below)				$\boxtimes$		
	notes: regulated acces						



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(a) by the SSO	П
(b) by national legislation	
(c) other (please specify below)	
notes:	
Have these mechanisms and procedures been subject to consultation w please provide details on how the consultation process was conducted (	
(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. company website, by press, at a conference)	on $\Box$
(d) consultation process supervised by relevant national authority	
(e) other (please specify below)	
notes:	
In case of congestion, what kind of solution do you apply or plan to apply	y (GGPSSO 4.2)
(a) market based (e.g. auctions)	
(b) pro rata	
(c) other (please specify below)	
notes: is regulated	
s the congestion management mechanism designed:	
(a) by the SSO	
(b) by national legislation	
(c) other (please specify below)	
notes:	
The congestion management mechanism:	
(a) has it ever been used?	
notes: no	
Unused capacity (e.g. day-ahead release of non-nominated injecta (GGPSSO 4.4):	ability and delive
(a) do you offer all unused capacity on an interruptible basis?	
notes: no	
Do you use other means to discourage hoarding and facilitate re-utilisa capacity? Please specify the nature of these arrangements	ation and trade of
answer:	





#### 5

(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	
	have drafted a code of conduct	
(d)	nave drafted a code of conduct	<u> </u>
(d) (e)	have drafted a code of conduct have implemented a compliance programme, supervised by a Compliance Officer	
(e) f th	have implemented a compliance programme, supervised by a Compliance Officer  ese measures have been monitored or supervised externally, please specify .1.a-c)?	· ·
(e)	have implemented a compliance programme, supervised by a Compliance Officer  ese measures have been monitored or supervised externally, please specify	by whom
(e) f th	have implemented a compliance programme, supervised by a Compliance Officer  ese measures have been monitored or supervised externally, please specify .1.a-c)?	· ·
(e)  f th o 5.	have implemented a compliance programme, supervised by a Compliance Officer  ese measures have been monitored or supervised externally, please specify .1.a-c)?  national regulatory authority	
(e)  f th o 5 (a) (b)	have implemented a compliance programme, supervised by a Compliance Officer  ese measures have been monitored or supervised externally, please specify 1.a-c)?  national regulatory authority  another relevant national regulatory authority (please specify)	



## 6 Transparency requirements

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

		In national language	In English	On the internet	Free of charge	Not 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	$\boxtimes$			$\boxtimes$	
(e)	storage code					$\boxtimes$
(f)	main storage standard conditions for each service					$\boxtimes$
(g)	rights and responsibilities of all users	$\boxtimes$			$\boxtimes$	
(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	$\boxtimes$			$\boxtimes$	
(k)	congestion management provisions	$\boxtimes$			$\boxtimes$	
(I)	anti-hoarding provisions	$\boxtimes$			$\boxtimes$	
(m)	re-utilisation provisions					$\boxtimes$
(n)	auction terms (where applicable)					$\boxtimes$
(o)	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	$\boxtimes$			$\boxtimes$	
(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)					$\boxtimes$

#### 6.2 Is the following operational information published (GGPSSO 6.5.a-e, 6.6.a-c, 6.9, 6.10):

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





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					
Whe	re you have not published specific data,	please stat	e why (rela	ating to GGF	PSSO 6.2., 6.3	5)
(a)	less than three users (information about the	e aggregate	use of stor	age)		]
(b)	three users or more, but still commercial se	ensitivity of ir	nformation			]
(c)	reasons of cost (or substantial IT development	nent needed)	)			
(d)	to avoid any potential market abuse					]
(e)	to avoid significant harm to storage users of	commercial in	nterest			]
(f)	other (please specify below)					]
	notes:					





stor any freq	ou have not published information as required by the GGPSSO about the rage, on the ground that such publication would harm the commercial inter alternative data published (e.g. aggregate inflows and outflows on a monuency-basis, non-numerical data)? Please specify and justify why this is the PSSO 6.3)	est of user(s), are
ans	wer:	
	ere unplanned disruptions in access to the storage services occur, do PSSO 6.8):	you ensure the
(a)	current system users are notified of that disruption as soon as possible	$\boxtimes$
(b)	information concerning the maintenance and disruptions that have occurred is made available upon request to those affected by the disruption	$\boxtimes$
ls th	rage penalties nere a clause or provision in the storage contract/code providing for compens storage users in the event you fail to fulfil contractual obligations (GGPSSO 8	
ans	swer: zes	
Are	registered users allowed to trade in the secondary market (GGPSSO 9.1) bundled services only	
(b)	both bundled and unbundled services	
	e you developed and used standardised contracts and procedures on the litate secondary trade of storage capacity (GGPSSO 9.1)?	primary market t
ans	swer:	
	here a clause in the storage code/contract referring to or addressing sacity trading explicitly (relating to GGPSSO 9.1)?	econdary storag
ans	swer:	
	you provide an electronic platform or bulletin board to facilitate secondary ing (GGPSSO 9.2, 9.3)	storage capacit
ans	swer:	
	e you taken any other steps to facilitate secondary storage capacity tradir	ng (GGPSSO 9.1)
ans	swer:	





9.2

9.3

9.4

#### Implementation of the other GGPSSO requirements 9

9.1	Necessary	/ TPA	Services -	please	indicate	if	you:
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		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 plai	n to take to fa	cilitate the
ntro ans	wer:	As of 1	n to take to fa	Not
ntro ans	wer:		Planned	Not
ans Seco	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