



## **Storengy's response to the ERGEG Public Consultation "Existing transparency requirements for natural gas", Ref: E10-GWG-68-03**

Storengy welcomes the opportunity to respond to the ERGEG consultation paper regarding transparency requirements for natural gas and would like to contribute to a constructive discussion on this subject. Below Storengy offers some general remarks within the framework of the present consultation. Moreover, we support the response to the consultation paper as submitted by Gas Storage Europe.

Storengy agrees with ERGEG in that transparency is an essential pre-requirement for a functioning internal gas market and underpins the development of effective and efficient market. We note that the Third Package will introduce substantial improvements in the area of transparency for the benefit of all market participants. As regards storage, the transparency provisions of the voluntary Guidelines for Good Practice of Storage System Operators (GGPSSO) will become legally binding. Nevertheless, given the fact that the Third Package scheduled for implementation in March 2011, the timing of ERGEG's consultation on transparency seems incompatible with the possibility to evaluate by market actors the effectiveness of the new legal provisions. Storengy is of the opinion that the present consultation should not lead to new proposals before the effective implementation of the Third Package provisions takes place and before market participants will be able to assess whether and, if so, where additional transparency is needed.

As regards natural gas storage, Storengy would like to recall that European storage operators have already displayed significant commitment to enhanced transparency by stepping up publication of storage data both individually and collectively, at the European level. The voluntary GGPSSOs have been implemented Europe-wide and several initiatives have been developed at the European level, some of which ahead of the expected legal requirements. This should be taken into account before resorting to any new legally binding proposals.

Moreover, it should be borne in mind that additional transparency requirements usually generate implementation costs. It is therefore of particular importance that any proposals reflect true market needs and ensure that only relevant and meaningful information is released. That is to say, enhanced transparency should not lead to the publication of just any piece of information but should ensure that market is provided with data allowing well-informed decisions without prejudice to the proper functioning of the infrastructure system. Similarly, it should not compromise the confidentiality of commercially sensitive data. In this context, any new proposal should be properly consulted with involved parties and should be well-balanced.



Finally, Storengy would like to note that transparency requirements should cover not only market participants, be it infrastructure operators or others, but should also relate to the transparency of decision making by regulators themselves. Currently, multiple consultations are being carried out by ERGEG, including in the area of gas storage. However, often the intention behind as well as the way the market feedback is taken into account lacks transparency. In many instances, upfront assumptions are made that the soon-to-be legally binding provisions will turn out insufficient. In this context, Storengy would welcome more visibility on the planned actions and concrete objectives as well as increased clarity on the basis on which certain assumptions are made.