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30.09.2005

ERGEG Report on Monitoring the implementation of the Guidelines for Good TPA Practice for Storage System Operators (GGPSSO)
Ref. E05-STO-06-03; 2005-09-07

Dear Sir or Madam,

With regard to your Report on Monitoring the implementation of the Guidelines for Good TPA Practice for Storage System Operators (GGPSSO) we would like to address obvious misunderstandings concerning the answers given by BEB in the questionnaire and hence ask you to update the report respectively:

- Information on SSOs:
 - In the GGPSSO report (page 9) is written that BEB offers a technical capacity of 1 bcm. This figure is incorrect. In fact BEB offers technical capacity of 1.751 bcm in total (1.099 bcm in storage Doetlingen, 0.520 bcm in storage Uelsen and 0.132 bcm in storage Harsefeld) (see our answer to the questionnaire on item 3.1).
 - Furthermore the footnote Nr. 10 on page 9 is misstated. BEB is providing these information for all its storages (including Doetlingen and Uelsen) as long and to the extent confidentiality requirements of users are unaffected. For the time being we provide these information on all storages.



- Confidentiality requirements:
 - In the GGPSSO report page 16 is written that BEB did not provide information concerning the development of IT systems and
 - in the GGPSSO report page 17 is written that BEB did not provide information concerning the location of SSO and supply business.

Both aforesaid statements are misstated. In fact BEB answered on both items 5.1(b) and 5.3 in the questionnaire that they are not applicable to BEB. As mentioned by BEB in the questionnaire and described in the GGPSSO report on page 10 BEB is one of "8 SSOs which are separate from other gas activities of the overall company,...". BEB is not longer active in the gas supply business. Therefore BEB has to answer the questions 5.1 (b) and 5.3 with "not applicable" and cannot give further information concerning these issues. For this reason BEB cannot be included in the statement "For as much as 66% of storage capacity monitored however compliance is unclear." (GGPSSO report page 17) as well.

If you have any questions please do not hesitate to contact us. BEB is looking forward to further constructive and fair discussions with ERGEG and all other market stakeholders.

Kind regards

BEB Speicher GmbH & Co. KG