

From: [REDACTED]
Sent: jeudi 3 décembre 2015 16:56
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Meeting 11h00 & follow-up TelCo on Friday at 11h15
Attachments: 20151111 - Toolbox - update 2015 - v7 - overview slide for DG ENER.ppt

Dear [REDACTED] dear all,

Please find enclosed the overview of storage measures in the EU and below some remarks:

- I have updated the legend to the map. I stick to 'storage obligation' and will not go for the word 'supplier obligation'. CEER seems to use it as synonyms on pages 23-25 and in figure 7 of their [report](#).
- Besides/ instead of strategic stock and storage obligation, many Member States have the measure '**access to gas storages in case of a crisis situation**' in place, as described in the CEER report on page 21. This is not shown in the map and also not consistently explained in the GSE toolbox yet.
 - This comes down that in case of emergency the TSO forces SSOs to withdraw gas that belongs to gas storage customers.
 - Especially in Germany there are concerns about how this would work contractually, as SSOs are forced to withdraw gas that is not theirs.
 - In general, there is a worry about the impact of this measure on the value of storage. You can imagine that without this measure, in a very tight situation a gas storage customer would be able to benefit from a price spike. With the measure, the price spikes are in fact levelled down. Booking gas storage becomes less attractive if you cannot benefit from price hikes (the whole idea is that a gas storage customer can benefit from price differentials...). The level of distortion of this measure depends a great deal on how the gas storage customers are compensated in case the TSO will use this right.
- Differences with CEER figure 7 on page 24:
 - Belgium: according to my information, there is no storage obligation in Belgium
 - Bulgaria: information [Ascari report](#)
 - Denmark: according to my information, the TSO books gas storage capacity and gas in storage for security of supply reasons (a constant amount throughout the year)
 - Poland: Although it is an obligation for the shipper, the stock is operated as a strategic reserve: this mandatory stock is at the disposal of the government for emergencies
 - Spain: see Poland
- Other remarks
 - Croatia: information based on situation before 2014
 - In The Netherlands, the TSO books an unknown volume of gas for predefined exceptional circumstances (if temperatures drop below -9°C). It is paid by shippers based on their market share. You could say this has an element of storage obligation (gas in storage for winter period) or strategic stock (no freedom for shippers to use the gas).

The situations in for instance Denmark, The Netherlands, Poland and Spain show that dividing storage measures in categories is not always easy. Differences in points of view are possible. I have the impression CEER focused on **who stores the gas** (hence Poland and Spain mentioned as storage obligations), while in this overview the focus is on **who controls the use of the gas** and the **purpose** (emergencies versus normal winter demand).

- In case shippers have to store before winter and can (within boundaries) use the gas, the measure is called storage obligation
- In case not shippers but a Competent Authority or the TSO decides on **when** to use the gas (emergencies), it is called strategic stock.

I hope this helps. Do not hesitate to contact me in case you have additional questions.

Kind regards,

[REDACTED]
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EU Transparency Register No 76130992074-15

From: [REDACTED]
Sent: Monday, November 30, 2015 15:36
To: [REDACTED]
Cc: [REDACTED]

Subject: RE: Meeting 11h00 & follow-up TelCo on Friday at 11h15

Dear all,

Thank you for your time this morning! I hope this was helpful.

- Please find enclosed the electronic versions of the documents shared.
- For the specific question on reverse flow, a conference call is planned on this Friday from 11h15 – 12h00. We can use the GIE TelCo facility: Call +32(0)24040305 – Pin 91430747

Kind regards,

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EU Transparency Register No 76130992074-15

From: [REDACTED]
Sent: Monday, November 30, 2015 10:25
To: Robert Jan Maaskant
Cc: [REDACTED]

Subject: RE: Meeting 11h00

Dear [REDACTED]

thanks for your message.

I'm sorry about this inconvenience for Christophe.

Kind regards, and see you at 11.00 h,

Stefan

From: [REDACTED]
Sent: Monday, November 30, 2015 10:06 AM
To: [REDACTED]
Cc: [REDACTED]
Subject: Meeting 11h00

Dear [REDACTED]

Please note that [REDACTED] will not be able to be present during our meeting at 11h00 as there is no train traffic possible between Lille and Brussels due to copper theft. Our sincere apologies.

I have gathered all materials and can explain the GIE suggestions for the Regulation 994/2010. I have also prints of the conclusions of the LNG workshop.

See you in a bit less than an hour!

Kind regards,

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Varying storage obligations across Europe

