

EREGEG 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 Directive¹). 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 storage users will be particularly important in assessing implementation of the GGPSSO.

¹ 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

EREGEG 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. EREGEG 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 EREGEG 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 EREGEG'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

1 General

1.1 Business name of respondent: Centrica Storage Ltd

1.2 Is access to your storage system provided:

(a) on a regulated basis	<input type="checkbox"/>
(b) on a negotiated basis	<input type="checkbox"/>
(c) both (<i>please provide comments below</i>)	<input checked="" type="checkbox"/>
notes:Negotiated access with a regulated storage contract and regulated auction should any capacity less than the defined minimum remain unsold 1 month prior to the start of the storage year.	

1.3 Is access provided:

(a) to a given storage facility	<input checked="" type="checkbox"/>
(b) to a group of storage facilities in the same balancing zone	<input type="checkbox"/>
(c) other (<i>please provide comments below</i>)	<input type="checkbox"/>
notes:Access provided to the Rough offshore storage field.	

if you answer that access is provided to a given storage facility/to a group of storage, please assume that all following answers will be interpreted accordingly

1.4 If access to storage is not provided to individual storage facilities, please provide details (e.g. how many groups, how many sites within group) and specify how this is arranged:

answer:

1.5 How many system users own capacity rights (date of reference: 1 April 2005)?

answer: 17 firm capacity customers - 39 customers are able to place physical nominations at Rough (i.e. injection and withdrawal nominations).

1.6 National framework:

(a) do you believe that there is a conflict between the requirements of the GGPSSO and national legislation that will materially affect either your interests or your ability to comply with the GGPSSO?	<input type="checkbox"/>
(b) if “yes”, did you notify your relevant national regulatory authority (GGPSSO Scope and Objective)?	<input type="checkbox"/>

2 Roles and responsibilities of Storage System Operators

2.1 Please specify if you are (GGPSSO 1.1):

(a) a separate entity (i.e. ownership unbundling)	<input type="checkbox"/>
(b) a separate entity (i.e. legal unbundling)	<input checked="" type="checkbox"/>
(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)	<input type="checkbox"/>
(d) part of a vertically integrated company (i.e. unbundling of accounts)	<input type="checkbox"/>

2.2 In the case of a SSO being part of a vertically integrated company:

(a) please provide details on the ownership structure. If an ownership diagram is available, please attach it to the completed questionnaire.	
details: Centrica Storage Ltd is wholly owned by Centrica plc, operating physically, legally and financially separate from the rest of the Centrica group.	
(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).	<input checked="" type="checkbox"/>

2.3 Please specify if you (GGPSSO 1.2.b):

(a) have developed and use standard storage contracts	<input checked="" type="checkbox"/>
(b) have developed and use a storage code (approved by national relevant regulatory authority)	<input checked="" type="checkbox"/>
(c) consulted users in developing the standard storage contracts or the storage code	<input checked="" type="checkbox"/>

2.4 Please provide details on how the consultation process for developing standard storage contracts/storage code was conducted (relating to GGPSSO 1.2.b)

(a) bilateral contacts with some users	<input type="checkbox"/>
(b) bilateral contacts with all users and some prospects	<input type="checkbox"/>
(c) open consultation process, with some sort of public announcement (e.g. on company website, by press, at a conference)	<input type="checkbox"/>
(d) consultation process supervised by relevant national regulatory authority	<input checked="" type="checkbox"/>
(e) other (<i>please specify below</i>)	<input type="checkbox"/>
notes: The standard storage contract (SSC) was developed through an industry workgroup with regulatory supervision by OFGEM. In addition CSL interprets the Undertakings given by Centrica Storage Ltd and Centrica plc to the Secretary of State for Trade and Industry following the Competition Commission referral as a Storage Code acting on CSL.	

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	Injectability	Deliverability
(a) technical capacity	34,835 GWh	160 GWh	455 Gwh
(b) available capacity	0 GWh	0 GWh	0 GWh
(c) contracted or held capacity	34,835 GWh	161 Gwh	458 GWh
(d) any storage capacity not available to TPA on the grounds of article 2(9) of the Gas Directive, with substantiated reasons ²			
notes: N/A			
(e) any other capacity excluded from TPA – other than the portion used for production operations and facilities reserved exclusively for the TSO	0	0	0
notes: CSL provides storage capacity and services for Operating Margins purposes to Transco (the TSO). Transco procures this capacity/gas in the same manner as available to any other customer. The holding at at 1 April 2005 was for 455 GWh of space.			

3.2 Please indicate if Public Service Obligations (PSO) in your country are placed on (relating to GGPSSO 3.2, 3.5, 3.6-3-15):

(a) the SSO	<input type="checkbox"/>
(b) the shippers	<input type="checkbox"/>
(c) no PSO	<input type="checkbox"/>
(d) other	<input type="checkbox"/>
notes:	

3.3 Capacity for Public Service Obligations (hereafter PSO):

(a) is storage capacity needed for any PSO offered on a TPA basis? (GGPSSO 3.2)	<input type="checkbox"/>
---	--------------------------

3.4 If any capacity needed for any PSO is NOT offered on a TPA basis, please state why:

(a) national legislation	<input type="checkbox"/>
(b) other	<input type="checkbox"/>
notes:	

² 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

3.5 Please provide the following data in normalised cubic meters for PSO, where NOT offered on a TPA basis (date of reference: 1 April 2005)

	<i>Space</i>	<i>Injectability</i>	<i>Deliverability</i>
(a) normalised cubic meters			

3.6 Do you offer the following services on the primary market (GGPSSO 3.3, 3.5, 3.7):

(a) bundled services (SBU) of space and injectability/deliverability	<input checked="" type="checkbox"/>
(b) a service which includes an obligation for the SSO to allocate the gas which has been nominated	<input checked="" type="checkbox"/>
(c) injection and withdrawal are possible at any time	<input checked="" type="checkbox"/>
notes:	

3.7 Are the following services separately charged (GGPSSO 3.3., 3.5, 3.7)?

(a) a service which includes an obligation for the SSO to allocate the gas which has been nominated	<input type="checkbox"/>
(b) injection and withdrawal are possible at any time	<input type="checkbox"/>
notes: Charges apply for capacity which is invoiced a month in arrears and a contractually fixed commodity charge applicable to actual nominations, again invoiced a month in arrears. 3.7 a & b are implicit within the capacity charge (extrinsic valuation).	

3.8 Where some services have NOT been introduced, please state why (GGPSSO 3.4.b, 3.5, 3.6, 3.7):

Obligation for the SSO to allocate according to nominations	
(a) consistent with the use of the interconnected gas transmission system	<input type="checkbox"/>
(b) not compatible with the balancing regime of the interconnected gas transportation system	<input type="checkbox"/>
Injection and withdrawal possible at any time	
(c) storage technical constraints	<input type="checkbox"/>
(d) economically use of the storage infrastructure	<input type="checkbox"/>
(e) consistent with the use of the interconnected gas transmission system	<input type="checkbox"/>
(f) not consistent with PSOs	<input type="checkbox"/>

3.9 If any of these services (please specify) has not been introduced for any other reason, please explain why

explanation:

3.10 Where there are limitations on the offer of services on the ground of either storage technical constraints or the economically efficient use of the storage infrastructure:

(a) was it made public and substantiated (GGPSSO 3.4.b)?	<input type="checkbox"/>
reasons for limitations: N/A	

3.11 Please indicate if services offered have been developed with consultation of storage users to take into account market demand. If “yes”, please provide details on how the consultation process was conducted (GGPSSO 3.4.a)

(a) bilateral contacts with some users	<input type="checkbox"/>
(b) bilateral contacts with all users and some prospects	<input type="checkbox"/>
(c) open consultation process, with some sort of public announcement (e.g. on company website, by press, at a conference)	<input type="checkbox"/>
(d) consultation process supervised by relevant national regulatory authority	<input checked="" type="checkbox"/>
(e) other (<i>please specify below</i>)	<input type="checkbox"/>
<p>details on consultation process: The Standard Storage Contract (SSC) defines the services offered by CSL. The SSC was developed through a consultation process with industry participants with regulatory supervision provided by OFGEM, the national regulatory authority,</p>	

3.12 Please specify the minimum size for each service (GGPSSO 3.8)

	<i>Space</i>	<i>Injectability</i>	<i>Deliverability</i>
(a) bundled services (SBU) of space and injectability/deliverability	1 KWh	1 KWh	1 KWh
(b) injection and withdrawal are possible at any time	1 KWh	1 KWh	1 KWh

3.13 Are storage users allowed to pool their nominations with a view to overcome potential capacity thresholds (GGPSSO 3.8)?

answer:	<input type="checkbox"/>
notes: No minimum capacity size at Rough (CSL)	

3.14 Please specify the maximum duration for each service offered by your SSO (GGPSSO 3.3.c)

(a) bundled services (SBU) of space and injectability/deliverability	<i>Annual or any number of years if agreed between CSL and the customer. 20% of capacity has to be offered on an annual basis.</i>
(b) other services	<i>Unbundled injection and withdrawal capacity is available from the part of the gas day remaining onwards</i>
notes:	

3.15 Please specify if you have developed information systems and electronic communications to provide adequate data to storage users and to simplify transactions such as:

	<i>Email</i>	<i>Internet</i>	<i>Other</i>
(a) nominations	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(b) capacity bookings	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(c) transfers of capacity rights between storage users	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(d) other	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

4 Storage capacity allocation and congestion management

4.1 What kind of capacity allocation mechanism do you apply (several answers possible, if mechanism applied different, depending on the storage facility/group of storage facilities)? (GGPSSO 4.1)

(a) market-based (e.g. auctions)	<input checked="" type="checkbox"/>
(b) first come first served	<input checked="" type="checkbox"/>
(c) capacity follows the customer	<input type="checkbox"/>
(d) other (<i>please specify below</i>)	<input type="checkbox"/>
notes: Capacity is sold to customers by any means until all capacity is sold out. It can therefore be argued that CSL uses price as the principal allocative mechanism with a first committed first served element. CSL has utilised indicative bid mechanisms to identify the market price for both SBUs and unbundled capacity, principally space - following price discovery this price is offered to all customers.	

4.2 Is the capacity allocation mechanism designed:

(a) by the SSO	<input type="checkbox"/>
(b) by national legislation	<input type="checkbox"/>
(c) other (<i>please specify below</i>)	<input checked="" type="checkbox"/>
notes: Through the consultation process identified in 2.4 of this questionnaire.	

4.3 Have these mechanisms and procedures been subject to consultation with storage users. If “yes”, please provide details on how the consultation process was conducted (GGPSSO 4.1.e)

(a) bilateral contacts with some users	<input type="checkbox"/>
(b) bilateral contacts with all users and some prospects	<input type="checkbox"/>
(c) open consultation process, with some sort of public announcement (e.g. on company website, by press, at a conference)	<input type="checkbox"/>
(d) consultation process supervised by relevant national authority	<input checked="" type="checkbox"/>
(e) other (<i>please specify below</i>)	<input type="checkbox"/>
notes:	

4.4 In case of congestion, what kind of solution do you apply or plan to apply (GGPSSO 4.2)

(a) market based (e.g. auctions)	<input checked="" type="checkbox"/>
(b) pro rata	<input checked="" type="checkbox"/>
(c) other (<i>please specify below</i>)	<input type="checkbox"/>
<p>notes: CSL interprets congestion as applying to short-term capacity. CSL sells short term interruptible capacity via a regulated price structure defined in the SSC or through bilateral negotiation.</p> <p>The regulated interruptible capacity is nominated by users and is deemed firm if it is not interrupted by CSL. Should this capacity need to be scaled back in case of congestion then CSL will apply a scaling factor based on the firm holdings for each company using interruptible capacity for each hour bar of the gas day remaining.</p> <p>Bilateral interruptible capacity is typically first sold at the day ahead stage. CSL posts a price for unbundled injection and withdrawal (UIOLI) at a fixed interruptible price at 16:00 D-1 and receives bids for 2 hours. Any congestion is resolved by allocating capacity against the volume of firm capacity held. The more firm capacity held the higher percentage of volume at the fixed price is allocated.</p> <p>Within day CSL will allocate interruptible capacity through bilateral negotiations, using price and volume to determine sales. In addition, CSL scales interruptible injection and withdrawal nominations against available capacity at times of congestion as a percentage of interruptible capacity flowing.</p>	

4.5 Is the congestion management mechanism designed:

(a) by the SSO	<input type="checkbox"/>
(b) by national legislation	<input type="checkbox"/>
(c) other (<i>please specify below</i>)	<input checked="" type="checkbox"/>
notes: Through the consultation process identified in 2.4 of this questionnaire..	

4.6 The congestion management mechanism:

(a) has it ever been used?	<input checked="" type="checkbox"/>
notes: Yes - Interruptible capacity is interrupted on most days when spare capacity is available.	

4.7 Unused capacity (e.g. day-ahead release of non-nominated injectability and deliverability) (GGPSSO 4.4):

(a) do you offer all unused capacity on an interruptible basis?	<input checked="" type="checkbox"/>
notes: Day ahead and within day products available (see 4.4)	

4.8 Do you use other means to discourage hoarding and facilitate re-utilisation and trade of storage capacity? Please specify the nature of these arrangements

answer:	<input checked="" type="checkbox"/>
notes: Interruptible capacity is available at a day ahead and within day. CSL offers the facility to trade all types of storage capacity between storage users using an electronic platform. CSL publishes the aggregate site nominations of all Rough users 3 times within day and once for day ahead. Customers are able to speak to each other through a bulletin board facility or through brokered markets.	

5 Confidentiality requirements

5.1 Please indicate if you (GGPSSO 5.1.a-c):

(a) keep databases related to storage operations separate	<input checked="" type="checkbox"/>
(b) develop new IT systems for the storage business separately (when new IT systems are being developed in vertically integrated undertakings)	<input checked="" type="checkbox"/>
(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	<input checked="" type="checkbox"/>
(d) have drafted a code of conduct	<input checked="" type="checkbox"/>
(e) have implemented a compliance programme, supervised by a Compliance Officer	<input checked="" type="checkbox"/>

5.2 If these measures have been monitored or supervised externally, please specify by whom (relating to 5.1.a-c)?

(a) national regulatory authority	<input checked="" type="checkbox"/>
(b) another relevant national regulatory authority (please specify)	<input checked="" type="checkbox"/>
(c) external audit	<input checked="" type="checkbox"/>
(d) other (<i>please specify below</i>)	<input checked="" type="checkbox"/>
notes: Office of Fair Trading (OFT) part of the Undertaking monitoring and internal Centrica compliance audit	

5.3 Are the SSO and the supply business located in separate buildings (GGPSSO 5.1.d)?

answer:	<input checked="" type="checkbox"/>
---------	-------------------------------------

6 Transparency requirements

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

	<i>In national language</i>	<i>In English</i>	<i>On the internet</i>	<i>Free of charge</i>	<i>Not applicable</i>
(a) if rTPA: tariffs and tariff methodologies for each service offered	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(b) if nTPA: main commercial conditions including the prices for standard services	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(c) If nTPA: updates of main commercial conditions including the prices for standard services, whenever the SSO changes them	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(d) services offered	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(e) storage code	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(f) main storage standard conditions for each service	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(g) rights and responsibilities of all users	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(h) rules (e.g. periods) for counter flows during injection and withdrawal	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(i) rules of storage capacity transfer in case of customer switching (if any)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(j) storage capacity allocation provisions	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(k) congestion management provisions	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(l) anti-hoarding provisions	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(m) re-utilisation provisions	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(n) auction terms (where applicable)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(o) rules applicable for storage capacity trade on the secondary market vis-à-vis the SSO	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(p) rules and charges applicable to storage penalties from storage users	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(q) compensation payments from the SSO to storage users	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(r) user-friendly instruments for calculating charges for a specific service (e.g. a tariff calculator)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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

	<i>In national language</i>	<i>In English</i>	<i>In energy units or ncm</i>	<i>Online information system</i>	<i>Free of charge</i>
(a) technical storage capacity	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(b) available storage capacity	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(c) contracted or held storage capacity	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

(d) aggregated inflows and outflows at least on a weekly basis for the immediately preceding week	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(e) historical utilization rates at least on a weekly basis for the immediately preceding week	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(f) user-friendly instruments for verifying online the level of available and/or unused storage capacity	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(g) maps indicating the location of their storage facilities and the connecting points of the storage facilities to the relevant network	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(h) methods of determining available storage capacity	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(i) operational parameters, including the rules of ownership and use of working gas	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(j) TSO's pre-emptive rights with operational rules and processes attached	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(k) any storage capacity not available to TPA on the grounds of article 2(9) of the Gas Directive, with substantiated reasons	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(l) all planned maintenance periods that might affect storage users' rights from storage contracts, at least once a year	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(m) the operational information corresponding to planned maintenance periods with adequate advance notice	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(n) regular updates on details, expected duration and effect of the maintenance	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

6.3 Where you have not published specific data, please state why (relating to GGPSSO 6.2., 6.3)

(a) less than three users (information about the aggregate use of storage)	<input type="checkbox"/>
(b) three users or more, but still commercial sensitivity of information	<input type="checkbox"/>
(c) reasons of cost (or substantial IT development needed)	<input type="checkbox"/>
(d) to avoid any potential market abuse	<input type="checkbox"/>
(e) to avoid significant harm to storage users commercial interest	<input type="checkbox"/>
(f) other (please specify below)	<input checked="" type="checkbox"/>

notes: CSL undertakes to release all capacity to the market through an obligation to sell the minimum amount of SBUs before the start of the storage year and also to release all available capacity within day. Therefore no direct method for verifying online the amount of unused storage capacity available is provided.

In addition, CSL has the right to sell storage capacity by any means possible but with a regulated auction (without reserve price) for any remaining capacity below the minimum amounts remaining 1 calendar month prior to the start of the storage year. CSL therefore may provide details of remaining available SBUs but will announce to the market when all SBU capacity is sold. Should capacity remain unsold 30 days before the start of the storage year then unused capacity volumes will be released to the market.

- 6.4** If you have not published information as required by the GGPSSO about the aggregate use of storage, on the ground that such publication would harm the commercial interest of user(s), are any alternative data published (e.g. aggregate inflows and outflows on a monthly –or any other frequency- basis, non-numerical data)? Please specify and justify why this is the case (relating to GGPSSO 6.3)

answer:

- 6.5** Where unplanned disruptions in access to the storage services occur, do you ensure that (GGPSSO 6.8):

(a) current system users are notified of that disruption as soon as possible	<input checked="" type="checkbox"/>
(b) information concerning the maintenance and disruptions that have occurred is made available upon request to those affected by the disruption	<input type="checkbox"/>

7 Storage penalties

- 7.1** Is there a clause or provision in the storage contract/code providing for compensation payments to the storage users in the event you fail to fulfil contractual obligations (GGPSSO 8.1.a)?

answer: The allocate whole principle requires CSL to make up any contractual shortfall in nominations even in the event of unplanned disruptions. In 6.5 above CSL will inform all market participants if the unplanned outage has the potential to seriously impact the market.

CSL is able to cancel injection if required by midday for the day ahead. A given number of these cancellation days are provided by the contract before penalties apply. Maintenance days are also provided for both injection and withdrawal. CSL is able to claim FM where applicable and payments apply and also to a sustained withdrawal outage that is not an FM event (3 day rule).

8 Secondary markets

- 8.1** Are registered users allowed to trade in the secondary market (GGPSSO 9.1)

(a) bundled services only	<input type="checkbox"/>
(b) both bundled and unbundled services	<input checked="" type="checkbox"/>

- 8.2** Have you developed and used standardised contracts and procedures on the primary market to facilitate secondary trade of storage capacity (GGPSSO 9.1)?

answer:

- 8.3** Is there a clause in the storage code/contract referring to or addressing secondary storage capacity trading explicitly (relating to GGPSSO 9.1)?

answer:

- 8.4** Do you provide an electronic platform or bulletin board to facilitate secondary storage capacity trading (GGPSSO 9.2, 9.3)

answer:

- 8.5** Have you taken any other steps to facilitate secondary storage capacity trading (GGPSSO 9.1)? Please specify how

answer: Encouraged the use of brokers to help storage capacity and gas in store trade more frequently plus bulletin board for storage customers to communicate with each other.

9 Implementation of the other GGPSSO requirements

9.1 Necessary TPA Services – please indicate if you:

	<i>As of 1 April 2005</i>	<i>Planned date of introduction</i>	<i>Not applicable</i>
(a) offer unbundled services supplementing SBUs at least for available storage capacity at the beginning of the storage year (GGPSSO 3.3.b)	<input checked="" type="checkbox"/>		<input type="checkbox"/>
(b) offer short-term (<1 year) services down to a minimum period of one day (GGPSSO 3.3.c)	<input checked="" type="checkbox"/>		<input type="checkbox"/>
(c) offer both firm and interruptible storage services (GGPSSO 3.3.d)	<input checked="" type="checkbox"/>		<input type="checkbox"/>

9.2 Where not already provided, please provide brief details on steps you plan to take to facilitate their introduction

answer:

9.3 Secondary market – please indicate if you:

	<i>As of 1 April 2005</i>	<i>Planned date of introduction</i>	<i>Not applicable</i>
(a) allow for title transfer for both bundled and unbundled capacities (GGPSSO 9.1)	<input checked="" type="checkbox"/>		<input type="checkbox"/>
(b) recognise the transfer of rights where notified by storage users for both bundled and unbundled capacities (GGPSSO 9.1)	<input checked="" type="checkbox"/>		<input type="checkbox"/>
(c) allow the new owner to aggregate such storage capacity operationally (GGPSSO 9.1)	<input checked="" type="checkbox"/>		<input type="checkbox"/>

9.4 Where not already provided, please provide brief details on steps you plan to take to facilitate their introduction

answer:

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