



**Consultation publique du 21  
décembre 2017 N°2017-19  
relative à la mise en œuvre de  
l'accès régulé des tiers aux  
stockages souterrains de gaz  
naturel en France**

**Enagás comments**

**NON-CONFIDENTIAL RESPONSE**

23<sup>rd</sup> January 2018



## 1 Introduction

1. Enagás welcomes CRE's new opportunity to contribute to the public consultation concerning the implementation of regulated access of third parties to the underground natural gas storage in France
2. Enagás has already expressed its views in previous consultations<sup>1</sup> and its participation in this new consultation is motivated by the measures which may have a relevant impact on the Spanish system.
3. Enagás response to this consultation is **not confidential and not anonymous**.

## 2 Questions

### Question 12. Are you in favour of the base contemplated by CRE?

4. Given that the reason of regulating storages in France mainly their desirability in terms of security of supply, the compensation term should be borne by domestic users and not by users of the IPs. I.e. the consumers benefitting from such security of supply should pay for it.
5. The CRE's proposal is to recover the potential gap by including a dedicated term in the transmission tariff, to be paid ultimately charged to certain national consumers. Therefore, Enagás has no objections to the proposed mechanism to that regard.

### Question 31. Are you in favour with the proposal of CRE to apply a nil reserve price for all storage products?

6. Enagás understands that the proposed mechanism does not constitute a cross-subsidy as long as consumers benefitting from security of supply are paying for it.
7. Enagás recommends, however, complementing the regulatory analysis with the possible impact of the measures, and in particular of a zero reserve price, on adjacent systems. The deviation of storage volumes from other Member States to France, due to charging access fees well below the total cost of storage, could negatively impact the economic viability of adjacent operators in other Member States.

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<sup>1</sup> CRE, "[Consultation publique de la CRE relative aux prochains tarifs d'utilisation des réseaux de transport de gaz de GRTgaz et TIGF et aux prochains tarifs d'utilisation des terminaux méthaniers régulés](#)". February 2016