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Commission de régulation de l'énergie (CRE)
15, rue Pasquier
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Subject: Shell response to the consultation on the next tariff for the use of regulated LNG terminals

General observations

Shell welcomes the opportunity to comment on the next tariff for the use of regulated LNG terminals, as consulted by CRE. Shell also strongly appreciates the amount of time provided by the CRE to respond to the consultation.

We finally thank CRE for its consideration of the point of view of foreign gas market participants by providing an English version of the public consultation.

Specific observations

(Q5) Are you in favour of the principle of pooling the "income from additional subscriptions to regasification capacity and additional services offered by operators" items of the CRCP for the Montoir de Bretagne and Fos Cavaou terminals, as proposed by Elengy?

In consideration of the benefits on tariff stability for the Montoir de Bretagne and the Fos Cavaou terminals, Shell shares the principle of partial pooling of the "income from additional subscriptions to regasification capacity and additional services offered by operators" items of the CRCP proposed by Elengy.

(Q7) For the Fos Cavaou and Montoir-de-Bretagne sites, are you in favour of increasing the k cap from +/- 3% to +/- 5% as proposed by Elengy?

Shell agrees with CRE's view that an increase in the k ceiling, by allowing a larger CRCP clearing at mid-period, would limit the possibilities of natural CRCP compensation over the whole tariff period. Shell is thus not in favour of increasing the k ceiling from +/- 3% to +/- 5% as proposed by Elengy.

(Q8) Are you in favour of updating the ATTM only halfway through the period or on an annual basis?

In line with CRE's view, Shell would support a mid-period update of the ATTM rather than an annual change.

(Q35) Are you in favour of setting up a virtual backhaul service at the PITTM as envisaged by Elengy?

Shell is in favor of both the virtual backhaul service proposed by Elengy and the modalities envisaged.

The safeguard mechanisms defined for the existing users result indeed in an adequate service which would facilitate and accelerate the development of the bioLNG market and, as a result, the decarbonisation of heavy road and sea transport in line with similar services existing at other European terminals.

We suggest additionally to trial the service on both Montoir de Bretagne and Fos Cavaou terminals rather than only on the latter.

We thank you for your attention and we remain at your disposal to discuss any of these matters further.

Francesco Mule'
Regulatory Affairs Manager

