



**Public consultation N°2019-014 of
23 July 2019 regarding the next
tariff for the use of Storengy,
Teréga and Geométhane natural
gas underground storage
infrastructures**

Enagás comments
NON-CONFIDENTIAL RESPONSE

4th October 2019



1. General remarks

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 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 3. Do you support the main pricing principles that CRE is considering for the ATS2 tariff?

1. 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.
2. The CRE's proposal is to continue recovering the potential gap by including a dedicated term in the transmission tariff, to be ultimately charged to certain national consumers. Therefore, Enagás has no objections to the proposed mechanism to that regard, as long as such charge is not applied to IPs.
3. 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.
4. Enagás recommends, however, complementing the regulatory analysis with the possible impact of the measures, and in particular of a zero or below-cost 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.