



# **Public consultation n° 2018-010 of July 2018 concerning the terms for marketing natural gas storage as of October 2018**

**Enagás comments**

**NON-CONFIDENTIAL RESPONSE**

27<sup>th</sup> August 2018



## 1 Introduction

1. Enagás welcomes CRE's new opportunity to contribute to the public consultation concerning the terms for marketing natural gas storage as of October 2018
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 8. Are you in favour of a zero reserve price for auctions of storage capacities marketed for N + 1, excluding L-gas storage?**

4. As mentioned in the previous public consultation, 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.
5. 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.
6. Taking into account the CRE's decision to recover the potential gap by including a dedicated term in the transmission tariff, to be paid ultimately charged to certain national consumers, Enagás has no objections to the zero reserved price for auctions of storage capacities.
7. However, Enagás recommends 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 relative à la mise en œuvre de l'accès régulé des tiers aux stockages souterrains de gaz naturel en France](#)". December 2017