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Energy Regulators



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**CEER Report Monitoring  
Implementation of the Gas Storage  
Guidelines of Good Practice and  
of the GSE Transparency Template**

**Ref: C15-GWG-121-03  
21 July 2015**



## INFORMATION PAGE

### Abstract

This report (Ref. C15-GWG-121-03) sets out CEER's monitoring of the implementation of two voluntary initiatives by European Storage System Operators (SSOs): i) the Guidelines of Good Practice for Gas Storage System Operators (GGPSSO) for Capacity Allocation Mechanisms (CAM) and Congestion Management Principles (CMP); and ii) Gas Storage Europe's (GSE) Transparency Template.

The report seeks to provide a detailed analysis of how well these important voluntary initiatives have been implemented. This allows CEER to highlight good performance and also to identify any shortcomings or wider issues in the gas storage market. Overall, the monitoring exercise has revealed high levels of implementation for both voluntary initiatives, whilst identifying certain important areas where marked improvements could be made.

This report is based on input from CEER Members in late 2014/early 2015. The findings of this report may be used by National Regulatory Authorities (NRAs) and policy-makers as they work towards delivering and maintaining well-functioning storage and flexibility markets in Europe.

### Target Audience

European Commission, energy suppliers, traders, gas/electricity customers, gas/electricity industry, consumer representative groups, network operators, Member States, academics and other interested parties.

### Keywords

Gas storage; Wholesale markets; Capacity Allocation Mechanisms; Congestion Management Principles; Transparency; National Regulatory Authorities, 3<sup>rd</sup> Package.

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## Related Documents

### CEER/ERGEG<sup>1</sup> documents

- [CEER Final Vision on Regulatory Arrangements for the Gas Storage Market](#), CEER, May 2015, Ref. C15-GWG-119-03
- [Amendment of the Guidelines of Good Practice of Storage System Operators \(GGPSSO\)](#), CEER, July 2011, Ref. C11-GST-15-03
- [Amendment of the Guidelines of Good Practice of Storage System Operators \(GGPSSO\)](#), ERGEG, February 2011, Ref. E10-GST-14-04
- [Assessment of CAM and CMP for effective access to storage and proposals for the amendment of the GGPSSO](#), ERGEG, July 2010, Ref. E10-GST-09-06
- [Status Review 2009: Capacity Allocation Mechanisms and Congestion Management Procedures for Storage](#), ERGEG, April 2010, Ref. E10-GST-09-03
- [Status Review 2008: Capacity Allocation Mechanisms and Congestion Management Procedures for Storage](#), ERGEG, December 2008, Ref. E08-GST-03-03
- [Final 2006 Report on Monitoring the Implementation of the Guidelines for Good TPA Practice for Storage System Operators \(GGPSSO\)](#), ERGEG, December 2006, Ref. E06-GFG-20-03
- [Guidelines of Good Practice for Third-Party Access for Storage System Operators \(GGPSSO\)](#), ERGEG, March 2005, Ref. E04-PC-01-14

### External documents

- [GSE Transparency Template](#), February 2013
- [Directive 2009/73/EC of the European Parliament and of the Council of 13 July 2009 concerning common rules for the internal market in natural gas and repealing Directive 2003/54/EC](#)
- [Regulation \(EC\) No 715/2009 of the European Parliament and of the Council of 13 July 2009 on conditions for access to the natural gas transmission networks and repealing Regulation \(EC\) No 1775/2005](#)
- [Directive 2003/55/EC of the European Parliament and of the Council of 26 June 2003 concerning common rules for the internal market in natural gas and repealing Directive 98/30/EC](#)

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<sup>1</sup> European Regulators Group for Electricity and Gas (ERGEG) was the forerunner to ACER. It was dissolved on 1 July 2011.



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## EXECUTIVE SUMMARY

### Background

In order to promote non-discriminatory markets and fair access to gas storage, ERGEG<sup>2</sup> issued its first Guidelines of Good Practice for Third Party Access (TPA) Gas Storage System Operators (GGPSSO) in 2005.<sup>3</sup> The Council of European Energy Regulators (CEER) published amendments to these guidelines, focusing on Capacity Allocation Mechanisms (CAM) and Congestion Management Procedures (CMP), in revised GGP in 2011.<sup>4</sup> The 2011 GGPSSO for CAM and CMP support the proper implementation of the 3<sup>rd</sup> Package, but are not legally binding on System Storage Operators (SSOs).

Meanwhile, CEER and Gas Storage Europe (GSE) worked together to develop GSE's Transparency Template in 2012/2013. The Transparency Template is a harmonised template for the publication of important information on SSO websites. The objectives of the Transparency Template are to help SSOs to fulfil transparency requirements (in particular 3<sup>rd</sup> Package requirements), meet customers' needs and ensure that the information published is easily accessible and comparable across European gas storage facilities. The final version of the Transparency Template was presented to the 23<sup>rd</sup> Madrid Forum in April 2013.<sup>5</sup> GSE members agreed to implement the Transparency Template on their websites on a voluntary basis.

Together, GSE's Transparency Template and CEER's GGPSSO are important initiatives that aim to promote open, fair, non-discriminatory and transparent access to storage facilities across Europe.

### Objectives and contents of the document

Monitoring is of fundamental importance to ensure that European energy markets work in the interests of consumers. This Monitoring Report sets out CEER's monitoring of implementation by European SSOs of the GGPSSO for CAM and CMP and of the GSE Transparency Template. Based on a survey among CEER Members, it provides detailed analysis of how well these important voluntary initiatives have been implemented. This allows CEER to highlight good performance and to identify any shortcomings or wider issues in the gas storage market. The findings of this report may be used by NRAs and policy-makers as they work towards developing and maintaining well-functioning storage and flexibility markets in Europe.

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<sup>2</sup> European Regulators Group for Electricity and Gas (ERGEG) was the forerunner to ACER. It was dissolved on 1 July 2011.

<sup>3</sup> [Guidelines of Good Practice for Third-Party Access for Storage System Operators \(GGPSSO\)](#), ERGEG, March 2005, Ref. E04-PC-01-14.

<sup>4</sup> [Amendment of the Guidelines of Good Practice of Storage System Operators \(GGPSSO\)](#), CEER, July 2011, Ref. C11-GST-15-03.

<sup>5</sup> [GSE Transparency Template](#), February 2013.



## **Brief summary of the conclusions**

The findings in this report are based on two surveys of CEER Members in late 2014.

### Survey to monitor implementation of GGPSSO for CAM and CMP

Overall, the results of CEER's monitoring of implementation of the GGPSSO for CAM and CMP by European SSOs are positive. In many instances, responses to our survey indicated near universal compliance with the requirements of the guidelines. There were, however, also a number of guidelines with a concerning low level of compliance.

CEER encourages SSOs to work towards 100% compliance with these important guidelines. We identify a set of key recommendations to improve compliance in the areas of transparency, innovation and allocation mechanisms. It is important to note that the findings of this monitoring exercise support the conclusions of CEER's 2015 Vision on gas storage.<sup>6</sup>

Some cases of non-compliance relate to different market structures across Europe and to the level of market maturity. In these cases, CEER encourages market participants to consider the findings of this report in the context of broader market development and the needs of gas storage users. This includes, for example, the ongoing implementation of the European Gas Network Codes.

NRAs should monitor SSOs' continued implementation of the GGPSSO for CAM and CMP and work with relevant SSOs to enhance compliance.

### Survey to monitor implementation of the GSE Transparency Template

In the majority of cases, the information which must be published according to the Transparency Template is published by SSOs on their websites. This is a positive finding and CEER welcomes the efforts of SSOs to make this information available. However, in a few areas there is considerable room for improvement regarding information provision.

The main finding of this Monitoring Report is that SSOs are not satisfactorily adhering to the structure and direct access requirements of the Transparency Template. The Transparency Template is intended to harmonise access to important information, making it readily accessible and easily comparable across European SSOs. Where information is not published under the correct submenu with direct access from the main Template, SSOs are preventing the realisation of this important objective.

SSOs should also ensure that they clearly publish the date when information was updated on all Transparency Template pages. Where an SSO believes that an information requirement should not apply to them, this should be clearly indicated on the page, rather than simply omitted.

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<sup>6</sup> [CEER Final Vision on Regulatory Arrangements for the Gas Storage Market](#), CEER, May 2015, Ref. C15-GWG-119-03.



Given the importance of transparency to the gas storage market, CEER encourages SSOs to improve their implementation of the Transparency Template. NRAs should support and monitor this implementation where appropriate.





## **1 Introduction**

Gas storage is a key component of the European internal energy market. Storage is an important flexibility asset that competes with other sources of flexibility to meet customers' needs. Gas storage also plays a crucial role in ensuring European security of supply. Therefore, it is important that the gas storage market in Europe is functioning effectively.

CEER believes that Third Party Access (TPA) and transparency are two vital building blocks for well-functioning storage markets. For this reason, we published amended Guidelines of Good Practice for SSOs (GGPSSO) for CAM and CMP in 2011. We also worked closely with Gas Storage Europe (GSE) in the development of their Transparency Template, finalised in 2013. More details about these initiatives are provided below in the relevant sections of this report.

This Monitoring Report sets out CEER's monitoring of implementation by European SSOs of the GGPSSO for CAM and CMP and of the Transparency Template. It provides detailed analysis of how well these important voluntary initiatives have been implemented. This allows CEER to highlight good performance and identify any shortcomings or wider issues in the storage market. The report summarises the findings of monitoring exercises conducted in late 2014 / early 2015.

### **Process undertaken by CEER**

To gather the information needed to carry out this monitoring exercise, CEER launched two surveys to CEER Members (one for the GGPSSO and one for the Transparency Template) in November 2014. Most responses were received by January 2015, with some additional submissions and amendments after this date. The analysis in this report is based entirely upon the information submitted to us. Unless explicitly stated otherwise, this information was accurate as of January 2015.

### **Structure of report**

This CEER Monitoring Report is divided into two main sections. The first covers CEER monitoring of implementation of the GGPSSO. The second section covers the Transparency Template. Each of these sections includes the background to the relevant initiative; the process undertaken by CEER to monitor implementation; responses to the CEER surveys; detailed analysis of implementation; and main conclusions.

### **Customer perspective**

CEER believes that functioning wholesale markets can deliver the best outcomes for customers. Gas storage is a key component of European wholesale markets. Together, GSE's Transparency Template and CEER's GGPSSO are important initiatives that aim to promote open, fair, non-discriminatory and transparent access to storage facilities across Europe. By monitoring the implementation of the GGPSSO and Transparency Template, this report helps to ensure that European storage markets are working in the interests of consumers.



## 2 Monitoring implementation of the Guidelines of Good Practice for Storage System Operators for CAM and CMP

### 2.1 The guidelines

The Guidelines of Good Practice for Third-Party Access for Storage System Operators<sup>7</sup> were first published by ERGEG<sup>8</sup> in 2005. The guidelines were intended to give a minimum set of rules required for the organisation of the market for storage capacity and to provide non-discriminatory access to TPA storage. These guidelines were directly related to the implementation of European Gas Directive 2003/55/EC<sup>9</sup>, but were not legally binding.

Following two ERGEG monitoring exercises on storage operators' compliance with the GGPSSO (2005 and 2006), two ERGEG Status Reviews on European gas storage (2008 and 2009) and the introduction of the 3<sup>rd</sup> Package of energy liberalisation legislation, ERGEG considered there to be a qualified basis for enhancements to the guidelines for CAM and CMP. After stakeholder engagement through a public consultation and a workshop, ERGEG published updated guidelines for CAM and CMP<sup>10</sup> in February 2011. CEER then published a revised version of this document following discussions with stakeholders at the March 2011 Madrid Forum.<sup>11</sup> These updated guidelines were supplementary to the 3<sup>rd</sup> Package and aimed to ensure a level playing field for access to storage across Europe.

### 2.2 Survey to monitor implementation of the GGPSSO

Although the GGPSSO are not binding on European SSOs, their proper implementation is of primary importance for delivering an efficient and well-functioning gas storage market. To gather the information needed to monitor implementation of the GGPSSO by European SSOs, CEER surveyed its Members in November 2014. Members were asked to provide information for each storage facility (or group of storage facilities) in their country.

For each guideline, Members were asked to indicate whether it had been implemented fully, partially or not at all. Members were also invited to give a more detailed evaluation of the implementation of each guideline and to provide any general comments.

CEER received input on 27 European SSOs from the survey. Table 1 below shows the storage operators (and their facilities) covered by the survey of CEER Members. Although German SSOs are not included in our monitoring analysis, the German NRA has indicated

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<sup>7</sup> [Guidelines of Good Practice for Third-Party Access for Storage System Operators \(GGPSSO\)](#), ERGEG, March 2005, Ref. E04-PC-01-14.

<sup>8</sup> European Regulators Group for Electricity and Gas (ERGEG) was the forerunner to ACER. It was dissolved on 1 July 2011.

<sup>9</sup> [Directive 2003/55/EC of the European Parliament and of the Council of 26 June 2003 concerning common rules for the internal market in natural gas and repealing Directive 98/30/EC.](#)

<sup>10</sup> [Amendment of the Guidelines of Good Practice of Storage System Operators \(GGPSSO\)](#), ERGEG, February 2011, Ref. E10-GST-14-04.

<sup>11</sup> [Amendment of the Guidelines of Good Practice of Storage System Operators \(GGPSSO\)](#), CEER, July 2011, Ref. C11-GST-15-03.



that the GGPSSO have been implemented by relevant SSOs. They pointed out that there is no congestion foreseeable and that the majority of storage capacity is auctioned.

Country	SSO	Storage facility
Austria	E.ON Gas Storage	7Fields
Austria	Astora	Haidach
Austria	OMV Gas Storage	OMV Storage Pool (Schönkirchen, Tallesbrunn, Thann)
Austria	RAG Energy Storage	RAG Storage Pool (Puchkirchen/Haag, Aigelsbrunn, Haidach 5, Nussdorf/Zagling)
Austria	GSA LLC	Haidach
Belgium	Fluxys Belgium	Loenhout
Bulgaria	Bulgartransgaz	Chiren
Croatia	PSP	Okoli
Czech Republic	MND Gas Storage	Uhřice
Czech Republic	RWE Gas Storage	Dolni Dunajovice, Třanovice, Lobodice, Štramberk, Háje, Tvrdonice
Denmark	Energinet.dk Gas Storage	Lille Torup
France	Storengy	14 facilities
France	TIGF	2 facilities
Hungary	MFGT	Kardoskút, Pusztaederics, Hajdúszoboszló, Zsana
Hungary	MMBF	Szőreg-1
Italy	STOGIT	STOGIT Pool (multiple facilities)
Italy	Edison Stoccaggio	Cellino, Collalto
The Netherlands	EnergyStock B.V.	EnergyStock
The Netherlands	Taqa Gas Storage B.V.	Bergermeer



Country	SSO	Storage facility
Poland	Operator Systemu Magazynowania Sp. z o. o.	Mogilno, Kosakowo, Wierzchowice, Husów, Strachocina, Brzeźnica, Swarzów
Portugal	REN Armazenagem	Carriço
Slovakia	NAFTA a.s.	Underground Natural Gas Storage NAFTA a.s.
Slovakia	Pozagas a.s.	Láb 4 Underground Natural Gas Storage Facility
Spain	Enagas	Serrablo, Gaviota, Yela, Marismas
Sweden	Swedegas	Skallen
United Kingdom	Centrica Storage Limited (CSL)	Rough
United Kingdom	SSE Hornsea Limited (SSEHL)	Hornsea

Table 1: SSOs covered by CEER's monitoring exercise

According to GSE data, CEER's monitoring of the implementation of the GGPSSO covers over 61% of total gas storage capacity in Europe.<sup>12</sup> This monitoring is limited by the input received, however, CEER believes that this is a significant proportion of European storage capacity and therefore we can draw meaningful conclusions based on the information provided.

### 2.3 Monitoring of implementation of CAM guidelines

The GGPSSO for CAM is made up of 8 guidelines on the following topics:

- Transparency
- Consultation with market
- Compatibility
- Combined products
- Balancing market
- Open Subscription Period (OSP)
- CAM depending on the result of an OSP
- Monitoring of capacity allocation conditions

<sup>12</sup> 66.4 bcm out of a total 108.6 bcm.



The detailed requirements for each guideline are discussed below. Figure 1 shows the level of implementation by SSOs for each of the CAM guidelines. Overall, this shows a positive picture of compliance with the GGPSSO for CAM. However, it also highlights areas for improvement. CEER analyses the level of compliance for each guideline in more detail below.

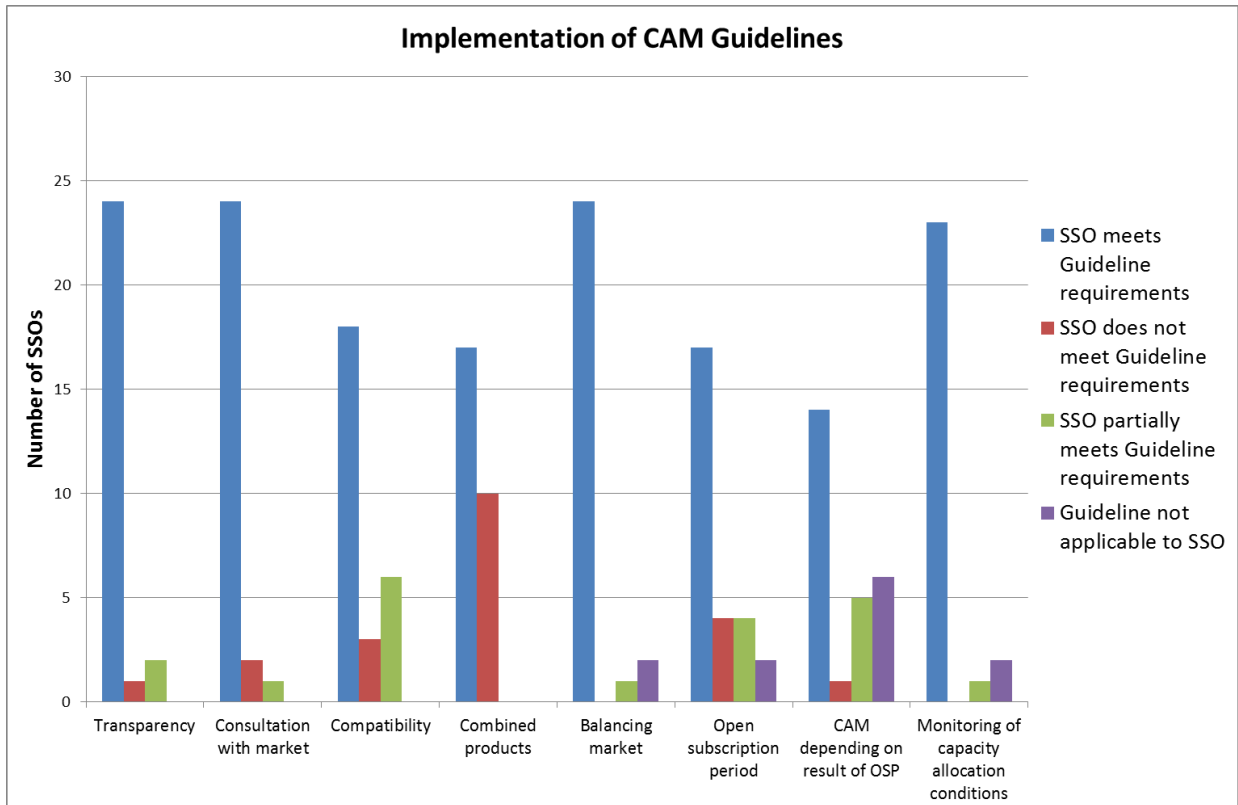


Figure 1: Monitoring results for GGPSSO CAM guidelines<sup>13</sup>

For the guideline on **Transparency**, the GGPSSO state that “Allocation of storage capacity shall be made transparent by detailed publication of timing, organisation (schedule) and aggregated results of applied allocation mechanisms on the internet in the local language as well as in English. If requested by users, English should also be used by the SSOs when communicating with (potential) storage users.” The vast majority of SSOs met the requirements of this guideline. One SSO did not and 2 were partially compliant. In these cases, the information was not available in English. **CEER encourages all SSOs to provide the necessary transparency information in English.**

The **Consultation with market** guideline states that “Allocation of storage capacity shall be subject to consultation with the market, e.g. concerning the actual design of the allocation mechanism(s).” Most SSOs complied with this requirement. However, the process is different in some countries where allocation mechanisms depend on storage obligations, which are defined by the relevant Ministry. In this case, consultation with the market is conducted

<sup>13</sup> For some guidelines, the total number of SSOs is less than 27. This is due to incomplete input from our survey.



through this process and the SSOs do not carry out additional public consultation. **CEER welcomes the high level of compliance in this area and recommends appropriate consultation with the market by all parties when designing storage allocation mechanisms.**

The **Compatibility** guideline specifies that *“Allocation of storage capacity shall ensure, on a best-effort basis, compatibility (e.g. regarding timing/lead time) with the transport capacity allocation mechanism(s) of the connected TSO(s) and the organisation of the gas trading market(s). Consequently, this also requires the alignment of, at least, a basic set of storage and transport products...that should be developed in cooperation between SSOs and TSOs.”* 18 SSOs met the requirements of this guideline, highlighting compatibility between products. However, 6 were only partially compliant and 3 did not meet the requirements of the guideline. Some respondents noted a misalignment between gas years for transmission and storage which restricts compatibility. Some SSOs offer bundled transmission and storage capacity to overcome this. One SSO has the systems in place to offer it should market participants request it. Czech SSOs offer a wide range of products and therefore all products offered may not be compatible. **CEER welcomes the mostly positive level of compliance, commends the innovative approaches to ensuring compatibility and encourages all SSOs to continue to strive for compatibility between products, where necessary and appropriate.**

Regarding **Combined products**, the GGPSSO advise that *“Allocation of storage capacity shall allow for the development of combined storage and respective transport capacity as one product.”* As Figure 1 above shows, SSOs in several countries do not offer combined products. **CEER would encourage SSOs to ensure that they are able to meet customers’ needs by being in a position to offer combined products if they are in demand.**

The guideline relating to the **Balancing market** states that *“Allocation of storage capacity shall take into account the needs for balancing markets by offering services which support the balancing, by aligning nomination and renomination periods and procedures to the technical requirements of the physical balancing regime.”* Most SSOs monitored had fully implemented this guideline. One SSO partially met the relevant requirements. The reason for this was that their market is currently being redesigned to comply with the European Network Code on Gas Balancing of Transmission Networks. **CEER welcomes this high level of compliance and the ongoing work to comply with European Gas Network Codes.**

The GGPSSO also advocates the use of **Open Subscription Periods (OSP)**. The relevant guideline suggests that *“Allocation of storage capacity shall start with a standardised, transparent, non-discriminatory survey that is fixed to a certain storage product in order to determine market demand for that storage product (OSP).”* The guideline also sets out some more detailed requirements relating to running an OSP. As Figure 1 shows, a number of SSOs are not compliant with this requirement. Many offer auctions, or a combination of contracting periods and auctions instead of an open season. In addition, some countries with regulated TPA do not have an open season as the prices for storage access are set by the NRA. **CEER notes that a well-designed auction process, like an OSP, provides all**



**market participants a fair opportunity to obtain capacity and can be considered a suitable alternative to an OSP which fulfills this requirement of the GGPSSO.**

The guideline on **CAM depending on the result of an OSP** states that *“The allocation mechanism used shall be determined by the results of the OSP. In particular, where possible auctions should be used if demand exceeds supply. If supply exceeds or is equal to demand, then allocation is “straightforward” but should be “non-discriminatory and transparent”.* Looking at Figure 1 and based on the responses to the previous question, it is clear that there are a wide range of methodologies used to allocate capacity, either through auctions or through contracting periods. **CEER believes that where access to storage is not regulated SSOs should make every effort to ensure that they respond to the needs of the market through appropriate allocation procedures, in line with the 3<sup>rd</sup> Package. Unless particular circumstances prevent the use of auctions, they should be used as the preferable, most market-based allocation mechanism.**

The final CAM guideline, **Monitoring of capacity allocation conditions**, requires that *“Before launching a new mechanism for allocation of storage capacity, an SSO shall offer to discuss the mechanism with its NRA”.* All respondents stated that they would, in some form, discuss the mechanism with their NRA. The only exception is Italy, where it is the NRA who proposes changes to the allocation procedure. **CEER welcomes the high level of compliance with this guideline.**

## **2.4 Monitoring of implementation of CMP guidelines**

The GGPSSO for CMP is made up of 9 guidelines on the following topics:

- Standardisation of secondary markets
- Standardisation of terms and conditions
- Renomination and unused capacity
- Dynamic capacity calculation
- Optimal use of storage and corresponding products
- Information on non-nominated capacity
- Transfer of working gas
- Pricing methods
- Aggregation and overcoming technical constraints

The detailed requirements for each guideline are discussed below. Figure 2 shows the level of implementation by SSOs for each of the CMP guidelines. Overall, this shows a relatively positive picture of compliance with the GGPSSO for CMP. However, it also highlights areas for improvement. CEER analyses the level of compliance for each guideline in more detail below.

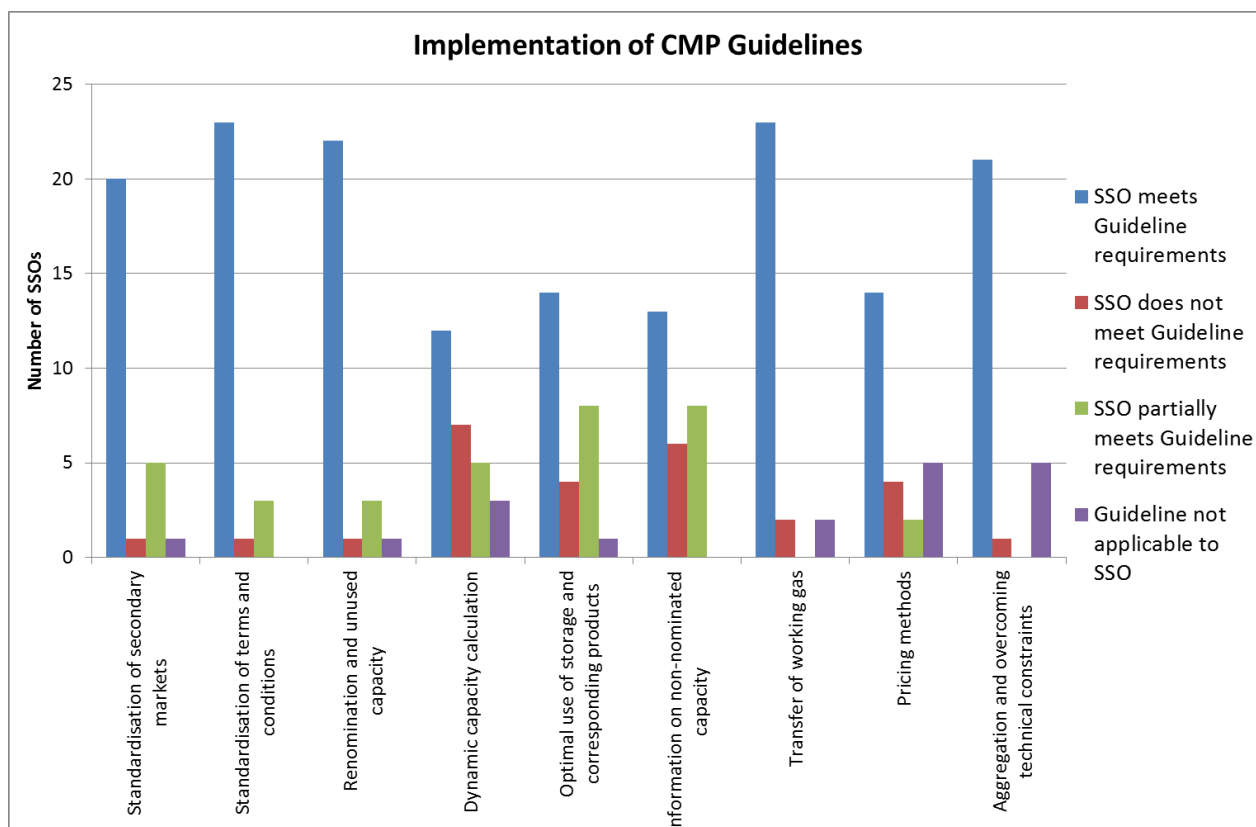


Figure 2: Monitoring results for GGPSSO CMP guidelines<sup>14</sup>

On **Standardisation of secondary markets**, the GGPSSO state that “SSOs *should be responsible for the facilitation of secondary markets for storage capacity.*” More detailed requirements relating to the implementation and operation of secondary markets are specified. One SSO was not compliant with this requirement and 5 were partially compliant. For instance, in some markets SSOs are not informed about all secondary market transactions and therefore can only keep records of transactions which are announced to them. A number of respondents noted that a web-based SSO platform is not used to facilitate training, or was under development as the time of our monitoring. In Sweden, given the “insignificant size of storage capacity” and the limited number of active shippers, a secondary market is “practically non-existent”. **CEER considers secondary markets to be of utmost importance and advocates that SSOs appropriately facilitate their development and operation.**

Regarding the **Standardisation of terms and conditions**, the guidelines state that “*The terms and conditions for access to storage and the processes for operating the secondary market and applying for interruptible products should be standardised, accessible in a timely manner to (potential) customers and published at least on the internet in both English and local language.*” The vast majority of SSOs meet this requirement. It is noted that one SSO currently does not offer interruptible products, and that more complex products (including

<sup>14</sup> For some guidelines, the total number of SSOs is less than 27. This is due to incomplete input from our survey.





interruptible ones) were under development. 3 SSOs only publish the required information in the local language; it is available but not in English. **CEER welcomes the high level of implementation for this guideline and recommends that all SSOs ensure that the required information is available in both the local language and in English.**

For **Renomination of unused capacity**, the guidelines stipulate “A primary customer makes, at best effort, a timely nomination to the SSO on the capacity that will be used. An SSO will make best efforts to stimulate and facilitate primary customers to do so.” A number of respondents referred to the respective rules in their countries requiring timely nomination. They also highlighted that renomination is possible within-day. Overall, it seems that the rules around nomination and renomination are clearly published and adhered to at most storage facilities in Europe. **CEER acknowledges this performance and encourages SSOs to maintain it.**

The guideline on **Dynamic capacity calculation** recommends that “Based on the nominations received and their own forecasts, SSOs shall strive to maximise the interruptible capacity products offer (at least on a day-ahead basis but preferably on a longer term basis), by dynamically calculating available capacity taking into account counter-flow nominations and information means available influencing capacity use. Based on dynamic calculations, SSOs may decide to perform a buyback of capacity if there is an actual need for this service and commitment of a user to contract this capacity immediately.” A significant number of SSOs have not implemented this guideline fully. Many SSOs do not carry out dynamic capacity calculation or buyback of capacity. Our analysis showed that some SSOs have specific interruptible products that are only available up until day-ahead. **CEER acknowledges that gas markets across Europe are at different stages of development, which may explain lower implementation levels for this guideline. CEER encourages SSOs to work towards developing more complex products and services, where appropriate.**

On the **Optimal use of storage and corresponding products**, the GGPSSO require that “SSOs will offer a reasonable amount of interruptible capacity on a (short) term and with a balanced mix of contract duration. Any unused capacity will be offered in both unbundled and bundled products on an interruptible basis. The design of products should be consulted with current and potential customers. The offered products should be market-based and take into account the needs of storage users but not be overly customised, so as to prevent “one user only fit”. Any limitations in offering products should only be the result of legal, operational or technical dependencies.” 4 SSOs have not implemented this requirement and 8 have done so partially. Some SSOs only offer interruptible products on a bundled basis. One SSO sells all capacity on a long-term basis. In Portugal, the NRA is responsible for the design of capacity products. **CEER advocates the development of interruptible capacity products, where appropriate.**

The GGPSSO recommend the provision of **Information on non-nominated capacity**. In particular, “Information on the amount of nominated storage capacity (on an aggregated level) should be provided by the SSOs on a day-ahead basis and the already sold day-ahead interruptible products. Similar best efforts should preferably apply to longer outlooks.” Close



to real-time and historical data should also be published on a website. Compliance levels with this requirement were relatively low. 1 SSO had no interruptible capacity bookings, hence no data on the use of interruptible capacities is published. Another was using a work-around to inform market participants of day-ahead and intraday nominations, while IT systems are repaired. A number of SSOs do not publish sufficient data on short-term nominations (e.g. day-ahead) or interruptible products. In Bulgaria, day-ahead nominations are not published because capacity is only sold in monthly, quarterly and yearly products. **Information provision on available storage capacity is necessary for the efficient operation of European storage markets and therefore CEER encourages SSOs to work to improve compliance with this guideline.**

Regarding the **Transfer of working gas**, SSOs should *“make an effort to facilitate the transfer of working gas of the same storage facility between a primary and secondary customer at the start and end of the duration of the interruptible or firm (bought at secondary market) contract. In case of a working gas transfer, the price should ideally be market-based.”* The vast majority of respondents indicated full implementation of this requirement. In nearly all cases, SSOs facilitate the transfer of working gas. A number of SSOs’ online platforms allow customers to trade gas with other customers. In most cases, the price is market-based, set by negotiations between transferring parties. In some cases, however, prices are regulated and not published. **CEER welcomes this high level of implementation for the transfer of working gas guideline.**

On **Pricing methods**, the GGPSSO recommend that the *“price for interruptible capacity that a secondary customer should pay reflects the probability of interruption. Other pricing methods, incentivising active storage capacity use – like “auctions and pay as used” – can be used if storage prices are not regulated.”* Many SSOs have implemented pricing which reflects the likelihood of interruption. Pay-as-used seems to be more widely used than auctions. In some cases, non-nominated capacities are operated at a fixed price. Where prices are regulated, the price reflects the probability of interruption. **CEER welcomes this high level of implementation.**

Finally, the guideline on **Aggregation and overcoming technical constraints** states that *“In case a storage facility has a high minimal flow and/or other technical constraints for relatively small users, SSOs will use reasonable endeavours to aggregate customers’ nominations. If aggregated nominations – despite these reasonable endeavours – are below the minimal flow level, SSOs shall cooperate with TSOs to allow a customer to continue to use a storage facility by reasonable measures, taking into account the balancing mechanism applied.”* SSOs demonstrated strong implementation of this requirement. Many SSOs do not restrict flows based on size of customer nominations. In some cases, this is because storage capacities are aggregated and operated as a virtual hub. Others have agreements with the TSO which facilitate fulfilling nominations even if these are the above technical constraints. Through our stakeholder engagement for the 2015 CEER Vision for Regulatory



Arrangements for the Gas Storage Market<sup>15</sup>, storage users emphasised the importance of having access to their gas in store at all times. **CEER welcomes these efforts to deliver customer nominations irrespective of flow levels.**

## 2.5 Conclusions on implementation of the GGPSSO for CAM and CMP

Overall, the results of CEER's monitoring of implementation of the GGPSSO for CAM and CMP by European SSOs are positive. In many instances, responses to the CEER survey indicated near universal compliance with the requirements of the guidelines. There were, however, also a number of guidelines with a concerning low level of compliance.

CEER encourages SSOs to work towards 100% compliance with these important guidelines. NRAs should monitor SSOs' continued implementation and work with relevant SSOs to enhance compliance. Key recommendations are set out below. It is important to note that the findings of this monitoring exercise support the conclusions of CEER's Vision for Regulatory Arrangements for the Gas Storage Market.

### Transparency

- Necessary transparency information should be provided in English.
- Market participants should be consulted on the design of storage allocation mechanisms in both negotiated and regulated TPA regimes.
- SSOs should work to improve information provision on available storage capacity.

### Innovation

- CEER welcomes and encourages appropriate innovation by SSOs to meet users' needs with regard to compatibility of products and combined products.
- CEER advocates the development of interruptible and other non-standard capacity products.

### Allocation mechanism

- CEER notes that a well-designed auction process, like an OSP, provides all market participants a fair opportunity to obtain capacity and can be considered a suitable alternative to an OSP which fulfills this requirement of the GGPSSO.
- CEER recommends the use of auctions as the preferred, market-based allocation mechanism unless particular circumstances necessitate the use of an alternative mechanism.

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<sup>15</sup> [CEER Final Vision on Regulatory Arrangements for the Gas Storage Market](#), CEER, May 2015, Ref. C15-GWG-119-03.



- CEER considers secondary markets to be of utmost importance and advocates that SSOs appropriately facilitate their development and operation.

Some cases on non-compliance relate to different market structures across Europe and to the level of market maturity. In these cases, CEER encourages market participants to consider the findings of this report in the context of broader market development and the needs of storage users. This includes, for example, the ongoing implementation of the European Gas Network Codes.



### 3 Monitoring implementation of the GSE Transparency Template

#### 3.1 What is the Transparency Template?

CEER strongly believes that transparency is the cornerstone of an efficient, well-functioning internal energy market. In order to promote transparency among European SSOs, CEER worked closely with Gas Storage Europe (GSE) to develop a harmonised template for the publication of important information on SSO websites – the GSE Transparency Template. The Transparency Template was developed to harmonise access to already existing information, making it more accessible to stakeholders and interested parties.

The objectives of the Transparency Template are to help SSOs to fulfil transparency requirements (in particular 3<sup>rd</sup> Package requirements), meet customers’ needs and ensure that the information published is easily accessible and comparable across European storage facilities.

CEER and GSE developed the Transparency Template in 2012/2013. The final version was presented to the 23<sup>rd</sup> Madrid Forum in April 2013. GSE members agreed to implement it on their website on a voluntary basis.

Table 2 below shows the Transparency Template “macro areas” and associated “submenus”, illustrating all the information covered by the Transparency Template.

	Macro Area	Submenu
1	Contact	Contact
2	Services and facilities	Technical characteristics Products and services
3	How to become a customer/user	How to book capacity Contract Information TSO information
4	Capacities	Primary market Secondary market
5	Tariffs and pricing	Pricing/Tariff information Fee/Tariff calculator
6	Legal documentation	Storage codes Regulation and legislation
7	Operational information	Maintenance Operational data
8	Miscellaneous	Projects

Table 2: GSE Transparency Template



For each submenu, specific associated detailed information must be published. Where implemented, the Transparency Template has been installed on a webpage of each SSOs website.

The conclusions of the 23<sup>rd</sup> Madrid Forum<sup>16</sup> welcomed this initiative and invited CEER to monitor its implementation by European SSOs. This report represents CEER's first monitoring exercise of the Transparency Template, having given SSOs sufficient time for implementation. The sections below set out the process behind our monitoring and our analysis of SSOs' implementation.

### **3.2 Survey to monitor implementation of the Transparency Template**

To gather the information needed to monitor implementation of the GSE Transparency Template by European SSOs, CEER surveyed its Members in November 2014. Members were asked to provide information for each storage facility (or group or storage facilities) in their country.

For the detailed information required under each submenu, CEER asked a number of questions to evaluate implementation of the Transparency Template, including:

- Is the relevant topic directly found when selecting the hyperlink on the SSO website (direct access)?
- Is all required information published in the right submenu/topic?
- Is all information that should be published indeed published on the SSO website?
- Is the published information sufficient?

CEER received responses from a number of Members covering a total of 52 European SSOs. 22 of the SSOs covered are non-GSE members who have not implemented the Transparency Template – they are therefore not included in the analysis of this report. Although the Transparency Template is a voluntary best-practice initiative that GSE members have agreed to implement, CEER advocates transparency by all European storage operators. Therefore, CEER recommends that all storage facilities consider their transparency arrangements and the possible implementation of the Transparency Template.

2 SSOs covered by the survey are non-GSE members that have implemented the Transparency Template on their websites, as shown in Table 3 below.<sup>17</sup> CEER welcomes this proactive promotion of transparency and, as above, encourages others to follow suit.

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<sup>16</sup> [Conclusions of the 23<sup>rd</sup> Madrid Forum](#).

<sup>17</sup> EWE Gasspeicher (Germany) have also implemented the Transparency Template even though they are not a member of GSE. CEER did not receive detailed information on EWE Gasspeicher's implementation of the Transparency Template in our survey to our Members. Therefore, they are not included in our detailed analysis in this report. EWE Gasspeicher operates multiple storage facilities in Germany (Nüstermoor L, Nüstermoor H, Rüdersdorf H, Jemgum).



The survey covers 28 GSE members. 26 GSE members had implemented the Transparency Template as of January 2015. 1 GSE member, RAG Energy Storage<sup>18</sup> (Austria), implemented the Transparency Template after this date. CEER welcomes this development but has been unable to include RAG Energy Storage's implementation in our detailed analysis. Another GSE member, Edison Stocaggio (Italy), has not implemented the Transparency Template on its website. CEER considers that sufficient time has been given for all GSE members to implement the Transparency Template and strongly encourages all relevant SSOs to do so as soon as is practicable.

In the analysis provided in the sections below, we evaluate implementation of the Transparency Template by the 26 GSE members who had implemented the Transparency Template as of January 2015 and the 2 non-GSE members covered by the survey who have proactively implemented it.

Table 3 below shows the storage operators (and their facilities) covered in the analysis in this Monitoring Report.

Country	SSO	Storage facility	GSE member	Transparency Template implemented
Austria	E.ON Gas Storage	7Fields	Yes	Yes
Austria	Astora	Haidach	Yes	Yes
Austria	OMV Gas Storage	Schönkirchen, Tallesbrunn, Thann	Yes	Yes
Belgium	Fluxys Belgium	Loenhout	Yes	Yes
Bulgaria	Bulgartransgaz	Chiren	Yes	Yes
Croatia	PSP	Okoli	Yes	Yes
Czech Republic	RWE Gas Storage	Dolni Dunajovice, Tranovice, Lobodice, Stramberk, Haje, Tvrdonice	Yes	Yes
Denmark	Energinet.dk Gas Storage	Lille Torup	Yes	Yes
France	Storengy	14 facilities	Yes	Yes
France	TIGF	2 facilities	Yes	Yes

<sup>18</sup> RAG Energy Storage operates multiple storage facilities (Puchkirchen/Haag, Aigelsbrunn, Haidach 5, Nussdorf/Zagling).



Country	SSO	Storage facility	GSE member	Transparency Template implemented
Germany	Astora	Rehden, Jemgum	Yes	Yes
Germany	E.ON Gas Storage	7Fields, Bierwang, Breitbrunn, Epe-H; Epe-L, Eschenfelden, Etzel EGL, Etzel ESE, Hähnlein, Kraak, Krummhörn, Nüttermoor, Kiel-Rönne, Stockstadt	Yes	Yes
Germany	OMV Gas Storage Germany	Etzel ESE	No	Yes
Germany	RWE Gasspeicher	Epe-H, Epe-L, Epe NL, Xanten, Kalle, Staßfurt	Yes	Yes
Germany	Storengy Deutschland	Fronhofen, Harsefeld, Bremen-Lesum, Peckensen, Uelsen, Schmidhausen	Yes	Yes
Germany	Trianel	Epe	No	Yes
Germany	VNG Gasspeicher	Bad Lauchstädt, Bernburg, Buchholz Kirchheiligen, Etzel	Yes	Yes
Hungary	MFGT	Kardoskút, Pusztaederics, Hajdúszoboszló, Zsana	Yes	Yes
Hungary	MMBF	Szóreg-1	Yes	Yes
Italy	STOGIT	STOGIT Pool (multiple facilities)	Yes	Yes
The Netherlands	EnergyStock B.V.	EnergyStock	Yes	Yes
The Netherlands	Taqa Gas Storage B.V.	Bergermeer	Yes	Yes
Poland	Operator Systemu	Mogilno, Kosakowo,	Yes	Yes





Country	SSO	Storage facility	GSE member	Transparency Template implemented
	Magazynowania Sp. z o. o.	Wierzchowice, Husów, Strachocina, Brzeźnica, Swarzów		
Portugal	REN Armazenagem	Carriço	Yes	Yes
Slovakia	NAFTA a.s.	Underground Natural Gas Storage NAFTA a.s.	Yes	Yes
Slovakia	POZAGAS a.s.	Láb 4 Underground Natural Gas Storage Facility	Yes	Yes
Spain	Enagas	Serrablo, Gaviota, Yela, Marismas	Yes	Yes
United Kingdom	Centrica Storage Limited (CSL)	Rough	Yes	Yes

Table 3: SSOs covered by CEER analysis of GGPSSO implementation

According to GSE data and information received in the CEER survey, the Transparency Template has been implemented by SSOs covering approximately 85 bcm of storage capacity (out of an EU total 108.6). This is an impressive statistic which supports the significance of the conclusions of our analysis.

### 3.3 Analysis

As seen in Table 2 above, the Transparency Template covers a wide range of important information. Our monitoring of implementation of the Transparency Template by SSOs focuses on four key questions:

- Is the correct topic found under each Transparency Template hyperlink?
- Is all the required information published under the correct submenu/topic?
- Or, is it published somewhere on the SSOs website?
- Is the information published on the SSOs website sufficient (in line with the requirements of the Transparency Template)?

In the sections below, for each submenu (grouped by macro areas) we graphically represent implementation against these questions and analyse the results. We also take a holistic view of whether sufficient information is published overall according to the Transparency Template. For the avoidance of doubt, this report is entirely based on the responses received to the survey.



### **Sufficient information published?**

It is critically important that market participants have access to the information they need about storage facilities in Europe. Figure 3 below shows whether SSOs are publishing sufficient information on their websites according to the detailed information requirements of the Transparency Template.

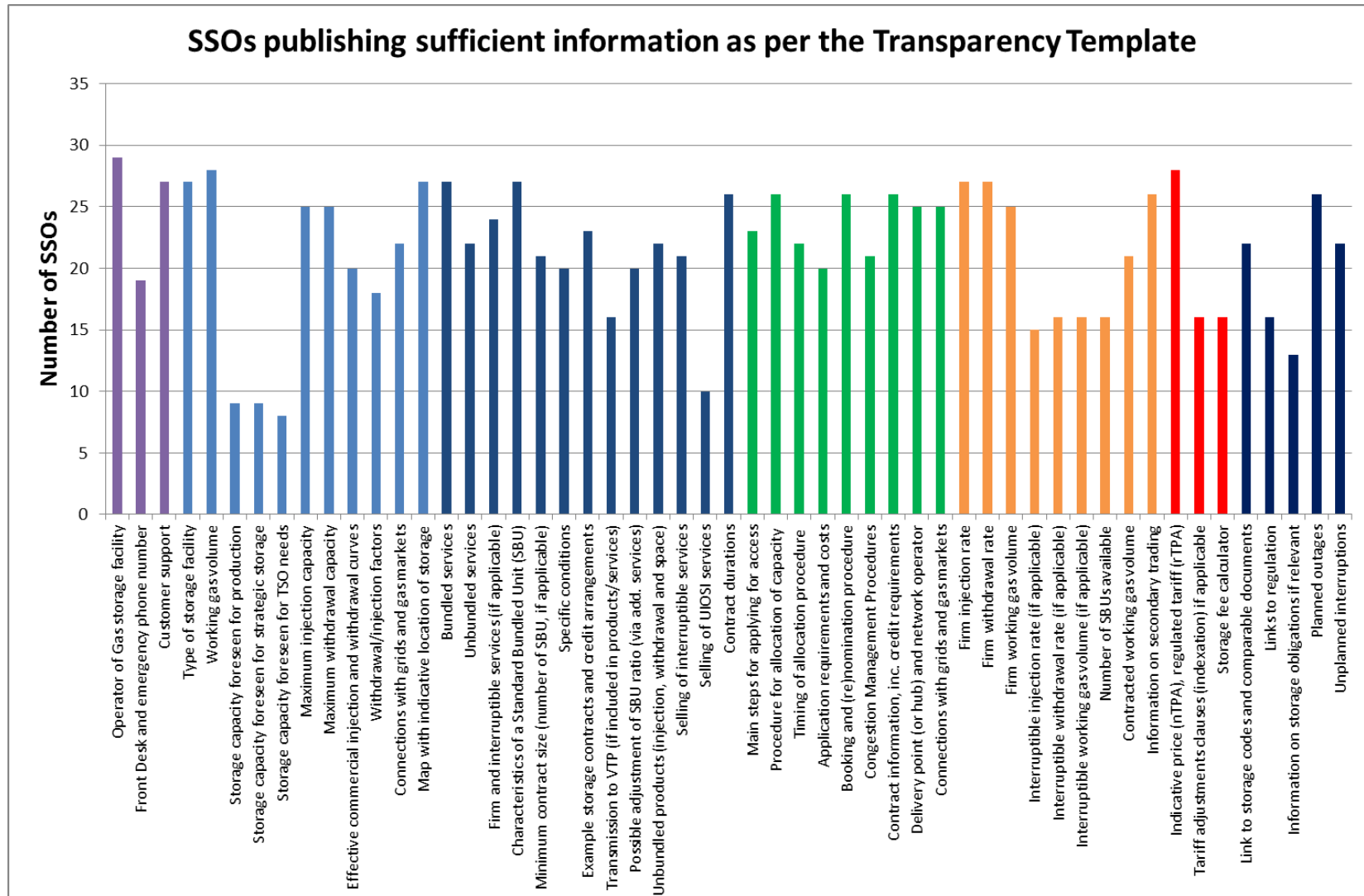


Figure 3: Overview of sufficiency of transparency information published by SSOs



The responses indicate a good level of transparency in a number of areas, with sufficient information consistently published by most SSOs. However, the results were not satisfactory in some areas. SSOs must make an effort, as a priority, to improve their provision of information in these areas.

### 3.3.1 Macro area 1: “Contact”

In this macro area, the GSE Transparency Template requires publication of contact information for the operator of the gas storage facility, for commercial customer support, for the front desk and for whom to contact in an emergency. This is basic but fundamentally important information.

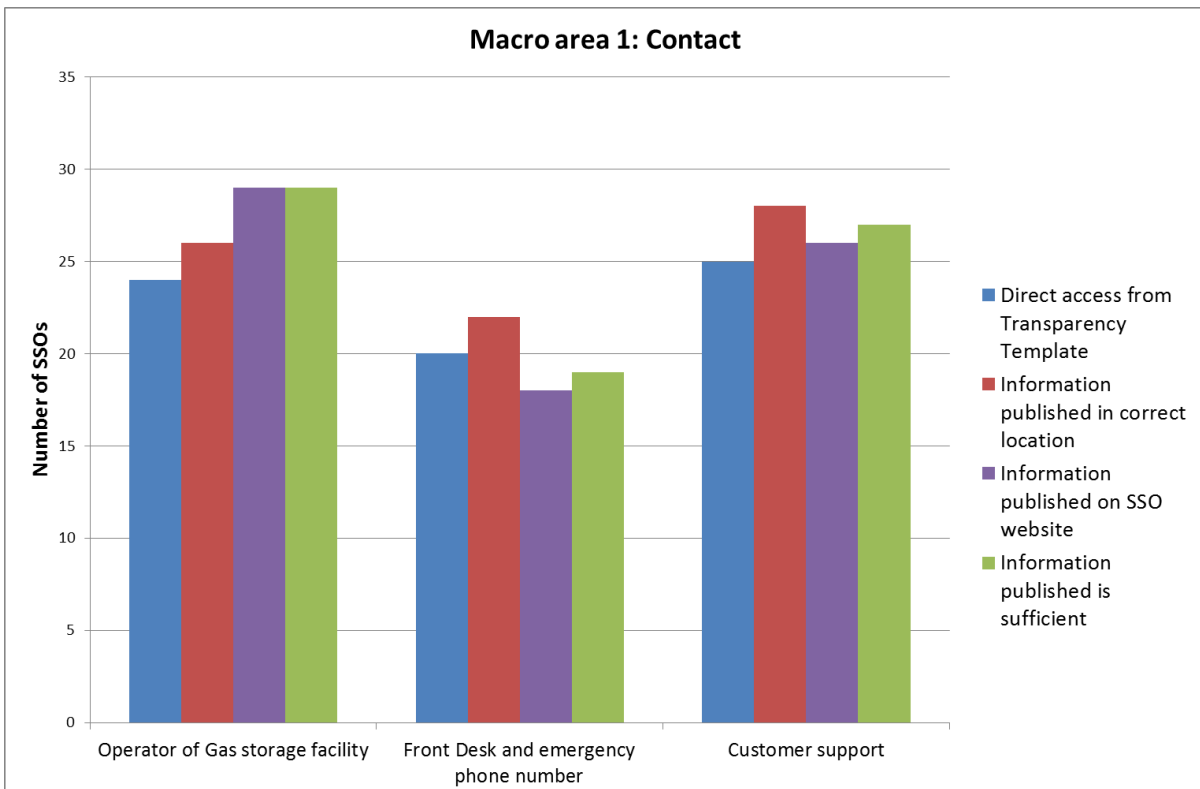


Figure 4: Implementation of the GSE Transparency Template macro area “Contact”

As Figure 4 above shows, most SSOs are publishing sufficient information that can be directly found under the correct submenu for the operator of the storage facility and the commercial customer support. However, publication of front desk and emergency contact information is not satisfactory for a number of SSOs. This is important information and CEER recommends that all SSOs ensure this information is easily located on their websites according to the Transparency Template structure.



### 3.3.2 Macro area 2: “Services and facilities”

The “Services and facilities” macro area covers a range of information on the technical characteristics of the facility and the products and services offered by the operator. This is fundamental information about the facility itself and access arrangements for customers.

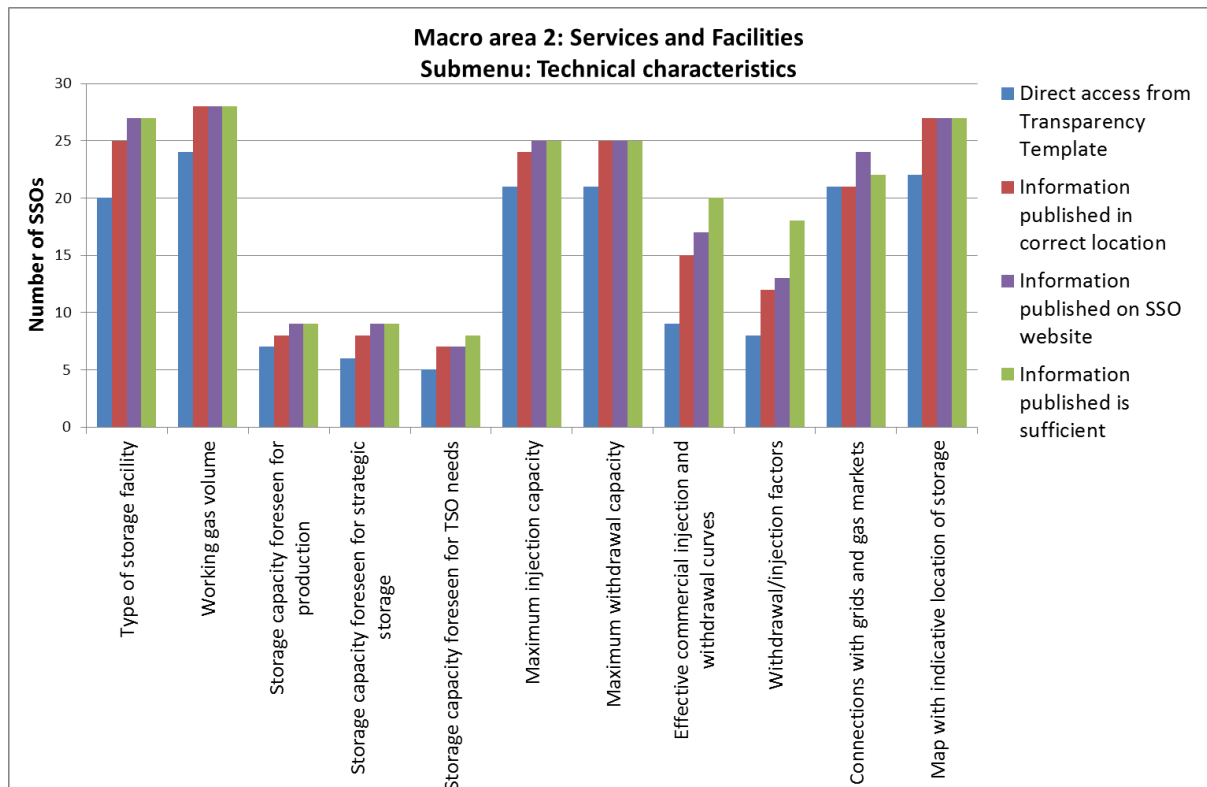


Figure 5: Implementation of the submenu “Technical characteristics” of the GSE Transparency Template macro area “Services and facilities”

Figure 5 above shows the responses received regarding the detailed information required under the “Technical characteristics” submenu of the macro area “Services and facilities”. There are a lot of positive results here. In particular, information on the type of storage facility, location and injection/ withdrawal rates is provided by nearly all SSOs, mostly directly accessible from the Transparency Template. However, provision of information on storage capacity foreseen for production, strategic storage and Transmission System Operator (TSO) needs is not satisfactory. There is also a need for improvement in the provision of effective commercial injection and withdrawal curves and publication of withdrawal/injection factors.

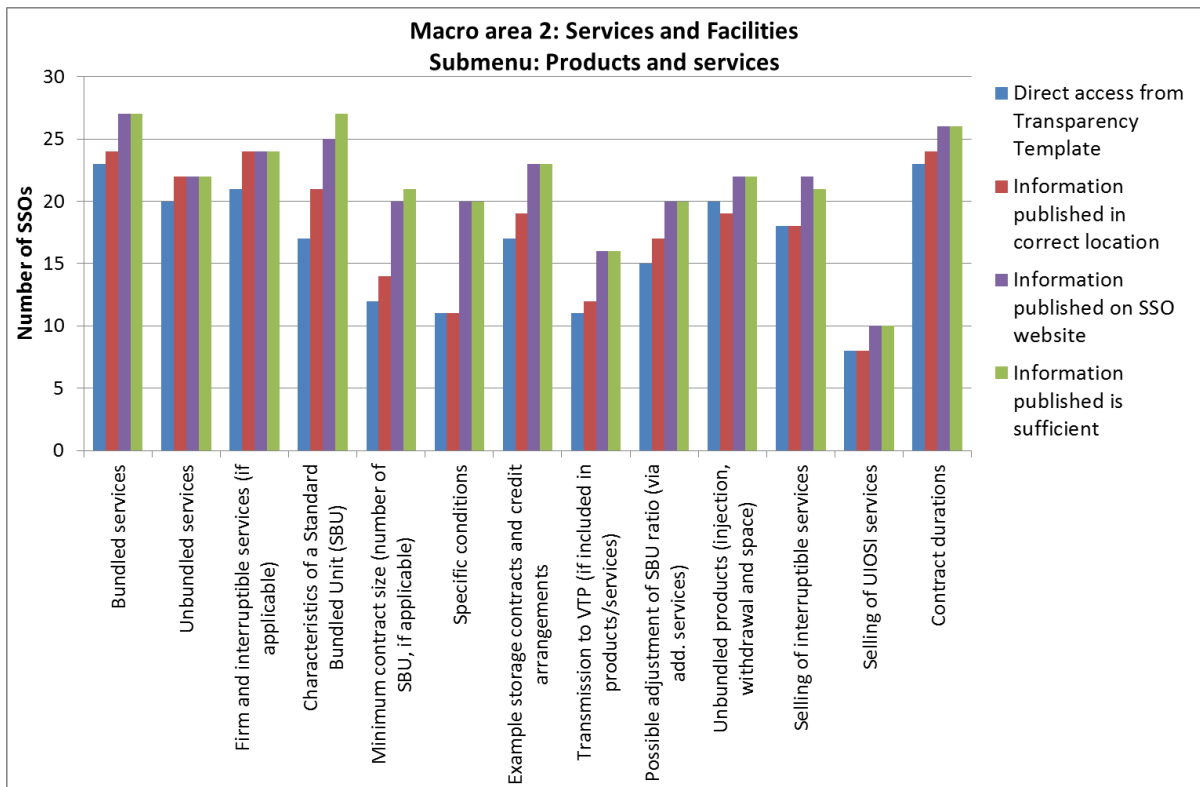


Figure 6: Implementation of the submenu “Products and services” of the GSE Transparency Template macro area “Services and facilities”

In the “Products and services” submenu, the results show average implementation levels with improved transparency possible in most of the detailed requirements. Information provision on the selling of Use it or Sell it (UIOSI) services is particularly weak.



### 3.3.3 Macro area 3: “How to become a customer”

This section of the Transparency Template provides important information on becoming a customer at a particular storage facility, such as the application process and required legal documentation. Customers need to be able to compare this information across storage facilities when making commercial decisions about booking storage capacity.

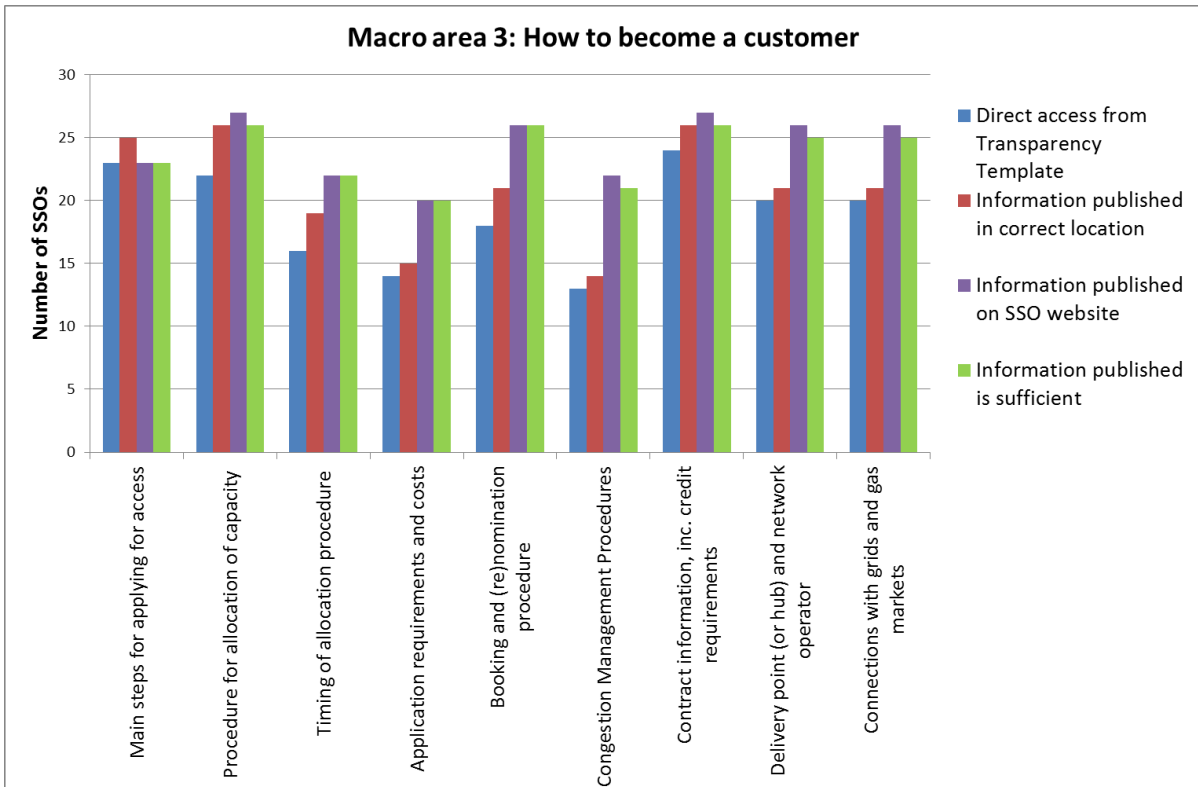


Figure 7: Implementation of the GSE Transparency Template macro area “How to become a customer”

The results for this macro area were good across the board. Given the importance of this area for new entrants, however, CEER would like to see 100% of this information easily accessible to all market participants. A notable area for improvement that would help to achieve this is ensuring that all the information is directly accessible under the correct Transparency Template submenu. As can be seen in Figure 7, in some cases the information required is not published in the right location. This is imperative for the information to be comparable and accessible across different storage facilities.



### 3.3.4 Macro area 4: “Capacities”

This section covers the commercial capacity of the storage facility. This includes the injection/withdrawal rates and working gas volume. It also provides information on the secondary market and platforms for secondary trading.

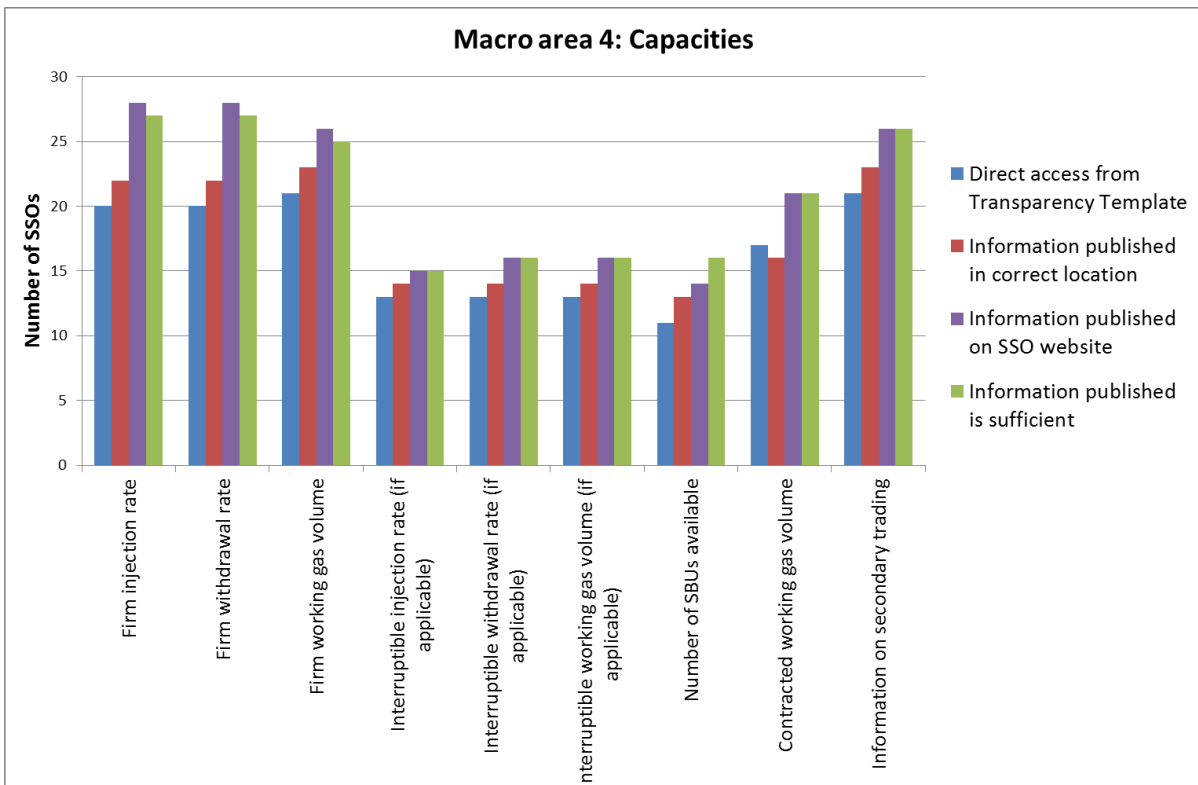


Figure 8: Implementation of the GSE Transparency Template macro area “Capacities”

As Figure 8 shows, publication of the detailed information required on the injection/withdrawal rates and working gas volume for unominated (interruptible) capacity offered day-ahead is relatively low. This may be due to these products not being offered at some facilities. CEER encourages SSOs to clearly state whether such services are available or not. The level of information published on the number of Standard Bundled Units (SBUs) available is unacceptable. CEER expects to see this improved as a matter of urgency. There is also room for improvement regarding information on contracted working gas volumes. Information provision on the other information points is stronger, but again all information should be published under the correct submenu with direct access from the Transparency Template to ensure standardisation across SSOs.





### 3.3.5 Macro area 5: “Tariffs and pricing”

Transparency with regard to the pricing of capacity is vital for a well-functioning market. The Transparency Template aims to make this information readily available and comparable across different storage facilities in Europe. This includes indicative prices for facilities operating under negotiated TPA and regulated tariffs for those under regulated TPA.

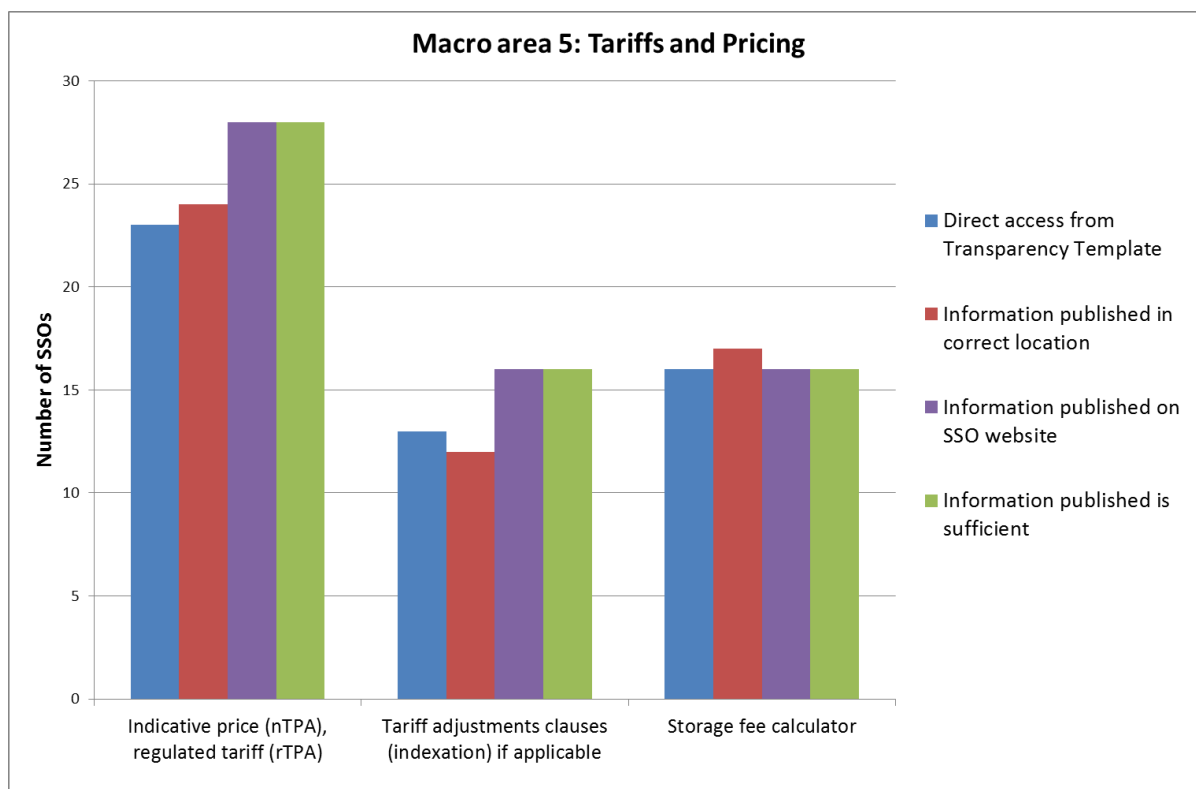


Figure 9: Implementation of the GSE Transparency Template macro area “Tariffs and pricing”

The information provided by SSOs on indicative prices (nTPA) and regulated prices (rTPA) is excellent and CEER commends SSOs for their efforts. Again, improvement could be made to ensuring direct access from the Transparency Template on all SSOs’ websites. It is disappointing to see poorer results for the provision of storage fee calculators and tariff adjustment clauses (where applicable). CEER would hope to see these results improve.

CEER’s wider stakeholder engagement has suggested that indicative prices posted by SSOs often do not reflect actual prices paid. CEER therefore urges SSOs to ensure that indicative prices published are as accurate as possible for specific products.



### 3.3.6 Macro area 6: “Legal documentation”

This macro area aims to ensure that important information about relevant legislation, regulation and storage interventions which may affect users of a storage facility is presented transparently.

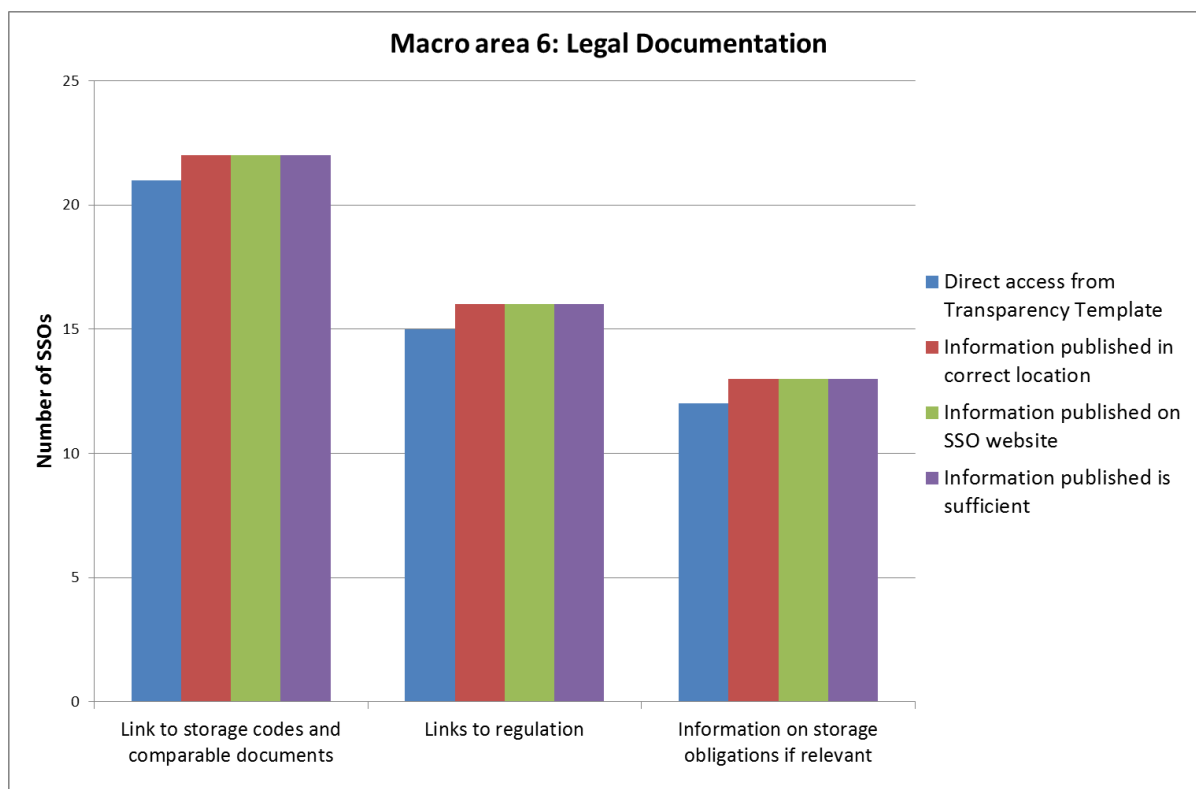


Figure 10: Implementation of the GSE Transparency Template macro area “Legal documentation”

Provision of links to storage codes and other relevant legislation is strong across most SSOs considered. This is a good result for transparency and important information to facilitate users' accessing storage capacity, particularly across borders. Information from more SSOs is needed on relevant security of supply obligations, where applicable. This is important information that may affect the way capacity is used at a particular storage facility; therefore, it is imperative that it is easily accessible for market participants.



### 3.3.7 Macro area 7: “Operational information”

The final macro area “Operational information” covers important information about planned outages, unplanned interruptions and live/historical data.

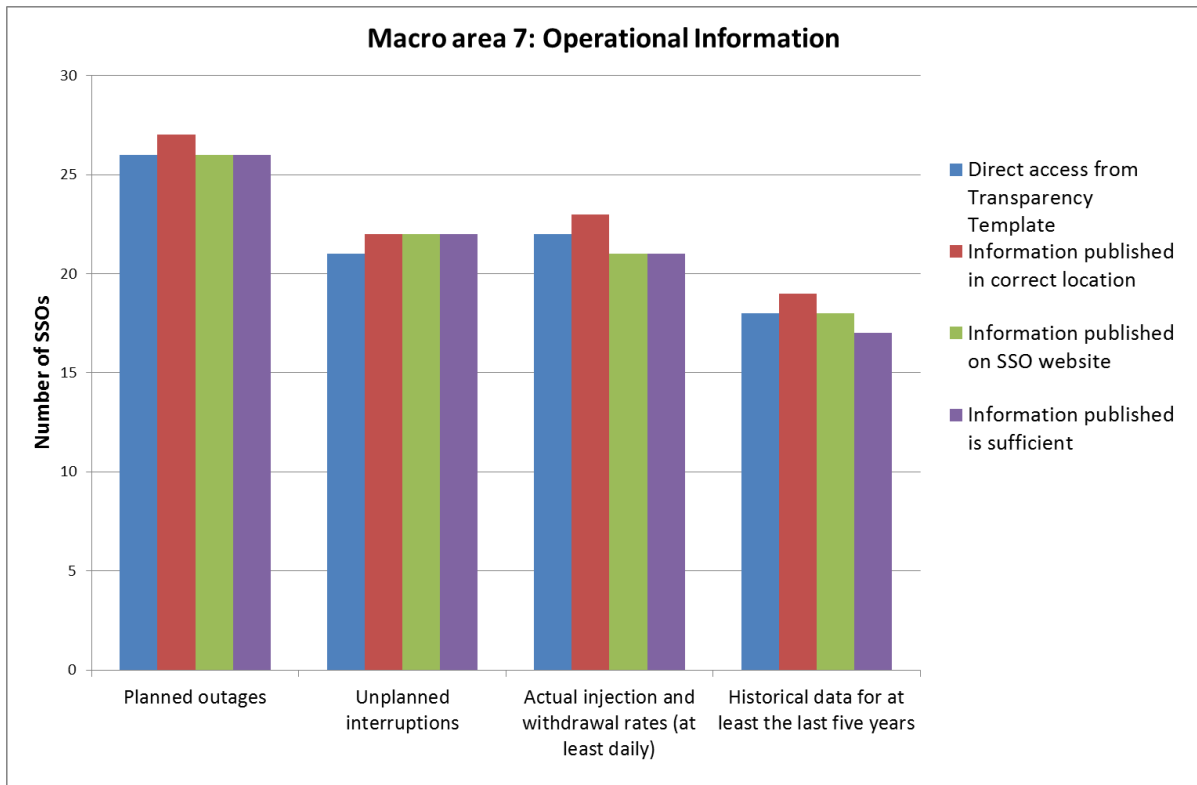


Figure 11: Implementation of the GSE Transparency Template macro area “Operational Information”

Information provision in line with the Transparency Template requirements on planned outages is generally strong. A small number of SSOs are not providing the necessary information on unplanned interruptions and actual injection/withdrawal rates. In addition, more historical data is needed at a number of facilities.



### **3.4 Conclusions on GSE Transparency Template implementation**

In the majority of cases, the publication of information foreseen in the Transparency Template is provided by SSOs on their websites. This is a positive finding and CEER welcomes the efforts of SSOs to make this information available. However, in a few areas there is considerable room for improvement.

The main finding of this Monitoring Report is that SSOs are not satisfactorily adhering to the structure and direct access requirements of the Transparency Template. The Transparency Template is intended to harmonise access to important information, making it readily accessible and easily comparable across European SSOs. Where information is not published under the correct submenu with direct access from the main template, SSOs are preventing the realisation of this important objective.

SSOs should ensure that they clearly publish the date when information was updated on all Transparency Template pages. Where an SSO believes that an information requirement should not apply to them, this should also be clearly indicated on the page, rather than simply omitted.

Given the importance of transparency to the gas storage market, CEER encourages SSOs to improve their implementation of the Transparency Template. NRAs should support and monitor this implementation.



## 4 Overall conclusions

This section recaps the conclusions of the GGPSSO and Transparency Template sections of this report.

### Monitoring implementation of the GGPSSO for CAM and CMP

Overall, the results of CEER's monitoring of implementation by European SSOs of the GGPSSO for CAM and CMP are positive. In many instances, responses to our survey indicated near universal compliance with the requirements of the guidelines. There were, however, also a number of guidelines with a concerning low level of compliance.

CEER encourages SSOs to work towards 100% compliance with these important guidelines. Key recommendations to help achieve this are set out below.

#### Transparency

- Necessary transparency information should be provided in English.
- Market participants should be consulted on the design of storage allocation mechanisms in both negotiated and regulated TPA regimes.
- SSOs should work to improve information provision on available storage capacities.

#### Innovation

- CEER welcomes and encourages appropriate innovation by SSOs to meet users' needs with regard to compatibility of products and combined products.
- CEER advocates the development of interruptible and other non-standard capacity products.

#### Allocation mechanism

- CEER notes that a well-designed auction process, like an OSP, provides all market participants a fair opportunity to obtain capacity and can be considered a suitable alternative to an OSP which fulfills this requirement of the GGPSSO.
- CEER recommends the use of auctions as the preferred, market-based allocation mechanism unless particular circumstances necessitate the use of an alternative mechanism.
- CEER considers secondary markets to be of utmost importance and advocates that SSOs appropriately facilitate their development and operation.

It is important to note that the findings of this monitoring exercise support the conclusions of CEER's Vision for Regulatory Arrangements for the Gas Storage Market.

Some cases on non-compliance relate to different market structures across Europe and to the level of market maturity. In these cases, CEER encourages market participants to



consider the findings of this report in the context of broader market development and the needs of storage users. This includes, for example, the ongoing implementation of the European Gas Network Codes.

### **Monitoring implementation of the GSE Transparency Template**

In the majority of cases, the publication of information foreseen in the Transparency Template is provided by SSOs on their websites. This is a positive finding and CEER welcomes the efforts of SSOs to make this information available. However, in a few areas there is considerable room for improvement.

The main finding of this Monitoring Report is that SSOs are not satisfactorily adhering to the structure and direct access requirements of the Transparency Template. The Transparency Template is intended to harmonise access to important information, making it readily accessible and easily comparable across European SSOs. Where information is not published under the correct submenu with direct access from the main Template, SSOs are preventing the realisation of this important objective.

SSOs should also ensure that they clearly publish the date when information was updated on all Transparency Template pages. Where an SSO believes that an information requirement should not apply to them, this should be clearly indicated on the page, rather than simply omitted.

Given the importance of transparency to the storage market, CEER encourages SSOs to improve their implementation of the Transparency Template.

### **Next steps**

As stated above, SSOs should work to ensure that both the GGPSSO for CAM and CMP and the Transparency Template are properly and fully implemented as a matter of priority. NRAs should support and monitor this implementation with relevant SSOs to enhance compliance where appropriate.



## **Annex 1 – About CEER**

The Council of European Energy Regulators (CEER) is the voice of Europe's national regulators of electricity and gas at EU and international level. CEER's members and observers (from 33 European countries) are the statutory bodies responsible for energy regulation at national level.

One of CEER's key objectives is to facilitate the creation of a single, competitive, efficient and sustainable EU internal energy market that works in the public interest. CEER actively promotes an investment-friendly and harmonised regulatory environment, and consistent application of existing EU legislation. Moreover, CEER champions consumer issues in our belief that a competitive and secure EU single energy market is not a goal in itself, but should deliver benefits for energy consumers.

CEER, based in Brussels, deals with a broad range of energy issues including retail markets and consumers; distribution networks; smart grids; flexibility; sustainability; and international cooperation. European energy regulators are committed to a holistic approach to energy regulation in Europe. Through CEER, NRAs cooperate and develop common position papers, advice and forward-thinking recommendations to improve the electricity and gas markets for the benefit of consumers and businesses.

The work of CEER is structured according to a number of working groups and task forces, composed of staff members of the national energy regulatory authorities, and supported by the CEER Secretariat. This report was prepared by the Gas Storage Task Force of CEER's Gas Working Group.

CEER wishes to thank in particular the following regulatory experts for their work in preparing this report: Edward Freeman, Tamas Korosi and Ryan McLaughlin.

More information at [www.ceer.eu](http://www.ceer.eu).



## Annex 2 – List of abbreviations

Term	Definition
CAM	Capacity Allocation Mechanisms
CEER	Council of European Energy Regulators
CMP	Congestion Management Principles
SSO	Storage System Operator
GSE	Gas Storage Europe
GGPSSO	Guidelines of Good Practice for Storage System Operators
NRA	National Regulatory Authority
nTPA	Negotiated Third Party Access
OSP	Open Subscription Period
rTPA	Regulated Third Party Access
SBU	Standard Bundled Unit
TPA	Third Party Access
TSO	Transmission System Operator
UIOSI	Use It or Sell It
VTP	Virtual Trading Point