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Subject: public consultation BK7-22-052 on the methodology to allocate costs of measures pertaining to the filling of gas storages

Bois-Colombes, June 14, 2022

Dear Sir or Madam,

The German energy regulatory authority Bundesnetzagentur launched a public consultation on the design of the storage levy resulting from the new law aiming notably at ensuring minimum storage filling levels. As a French gas transmission system operator whose network is connected to Germany, GRTgaz would like to thank Bundesnetzagentur for the opportunity to contribute to this public consultation and offer some comments on the methodology to allocate costs between gas exit points.

GRTgaz notes that the proposed methodology foresees that the storage levy be charged without distinction on all exit points, be they exits to German consumers or cross-border interconnection points. Such a levy imposed on exit interconnection points would likely have an impact on the level of gas flows between Germany and its neighbouring countries due to the implications on the competitiveness of the concerned gas routes.

Such a levy may also imply that costs pertaining to German security of supply would be borne by consumers from neighbouring countries. GRTgaz notes that this would be contrary to the methodology implemented in France where only domestic consumers are required to contribute to the costs linked to French security of supply.

Regarding the specific case of the interconnection point between Germany and France, GRTgaz would like to highlight that the majority of the exit capacity in Medelsheim is “dynamically allocable firm (DZK)”, ie. gas exiting Germany at this point originates from the Waidhaus entry point. As a consequence, this gas does not benefit from security of supply measures implemented in Germany (without gas in Waidhaus, no exit capacity can be offered in Medelsheim), which makes any levy on the Medelsheim exit point debatable.

In light of the points raised above, GRTgaz would like to recommend that no storage levy applies at cross-border interconnection points and would be happy to discuss this issue further if needed.

Yours sincerely,

Philippe MADIEC  
Vice President