



Application of CAM, CMP and anti-hoarding mechanisms in European LNG terminals

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- **GLE welcomes CEER's final study on CAM, CMP & anti-hoarding mechanisms in European terminals**
 - Shippers responding to CEER's Public consultation on LNG Terminals mainly expressed satisfaction with the CAMs and CMPs applied
 - There are specificities which must be taken into account when designing CMPs for LNG Terminal compared to transmission facilities
 - Diversity of CMPs could be explained by the particular characteristics and technical constraints, both in LNG facilities and downstream gas markets

GLE notes that the CEER study found no evidence of capacity hoarding in EU LNG terminals.

- **LNG production, liquefaction and regas facilities are multibillion euro investments**
 - A stable regulatory framework is fundamental if Europe is to continue to compete effectively for future new LNG production
 - Long term supply contracts are generally required to underpin LNG investments and future regulation should respect that
 - The global nature of the LNG must be taken into account. Europe competes with the rest of the world in attracting LNG flows so comparisons with other markets can be very relevant.
- **The role played by European LNG terminals may differ at each location but all Terminals make a contribution to gas (and power) security of supply**

- **Harmonisation of CAM & CMP rules across European LNG terminals should not be rushed**
 - Shippers have expressed satisfaction and CEER have found no evidence of hoarding
 - Unified CMP design may be neither feasible or desirable
 - Further experience on CAM and CMP operations in Europe's terminals will help determine whether changes are required at any terminal
 - Changes should only be considered when there is clear evidence of need and should be tested to ensure that they reach the right balance.
- **Differences on CAM and CMP should not be considered as a barrier for new entrants.**
 - Parties who are in a position to make commitments to purchase LNG cargoes have the necessary skills and resources to gain access to terminals

- GLE is happy to work closely with CEER on a common transparency web template in order to make it easier for potential users (and regulators) to improve their understanding on access arrangements at each terminal.
- GLE is ready to work with CEER in the definition of criteria and indicators that can facilitate understanding of capacity utilisation
 - LSOs are publishing the information required under the 3rd package.
- In designing the Gas Target Model care should be taken by CEER to avoid detrimental impact on LNG operations

1. The new common Transparency template will make it easier for new users and regulators to gain a better understanding about the access arrangements at each terminal.
2. Current CAM & CMP rules enable access for new entrants and there is no evidence today that they are preventing or limiting access.
3. Further harmonisation at EU-level on CAM and CMP should only be considered when there is clear evidence of need
4. The global nature of the LNG business should be considered, as should the need to maintain a balance between the interests of the capacity holders and the potential users
5. In designing the Gas Target Model care should be taken to avoid detrimental impact on LNG operations
6. GLE is ready to work with CEER in the definition of indicators that can facilitate understanding of capacity utilisation



**Thank you
for your kind attention!**