

Storage System Operators Transparency Compliance Audit

A report for Gas Storage Europe (GSE)

Guido Cervigni
Dmitri Perekhodtsev
Anastasia Tseomashko

1 November 2012

Table of contents

Section 1	Introduction and summary	1
	Background	1
	Scope of the report and methodology	1
	Findings and recommendations	2
	Outline of the report	3
Section 2	Requirements and implementation of Article 19 of regulation 715/2009	4
	Introduction	4
	Article 19 (1)	4
	Article 19 (2)	5
	Article 19 (3)	5
	Article 19 (4)	6
	Article 19 (5)	8
Section 3	Methodology of the transparency audit	9
	Scope of the audit	9
	Transparency requirements	9
Section 4	Results of the monitoring exercise	12
	Overall assessment	12
	Assessment of transparency compliance by area of monitoring	14
	Conclusion and observations	15
Annex 1.	List of the storage facilities	17

Section 1

Introduction and summary

Background

- 1.1 Storage System Operators (SSO'S) are legally bound to implement the "Transparency requirements concerning storage facilities and LNG facilities" under the Art. 19 of Regulation EC 715/2009¹. Furthermore, in July 2011 the Council of European energy Regulators ("CEER") has issued the legally non binding amendment of the Guidelines of Good TPA Practices for the Storage Operators ("GGPSSO") on Capacity Allocation Mechanisms (CAM) and Congestion Mangement Principles (CMP)².
- 1.2 According to CEER's Work Program and to the conclusions from the last Madrid Forum 21, CEER is planning to perform two monitoring exercises during 2012:
 - implementation of the transparency requirements under the 3rd package; and
 - GGPSSO implementation.
- 1.3 Gas Storage Europe (GSE) asked FTI Compass Lexecon to carry out an independent audit of the compliance with the transparency requirements of the Art. 19 of regulation EC 715/2009 all European storage system operators (SSO).

Scope of the report and methodology

- 1.4 This report contains the results of an independent assessment of the compliance with Art. 19 of Regulation EC 715/2009 by all European SSO's. It starts from explaining the transparency requirements of the Article 19, including the interpretation by Gas Storage Europe (GSE) on their implementation.

¹ 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, available at: <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2009:211:0036:0054:EN:PDF>.

² Available at : http://www.energy-regulators.eu/portal/page/portal/EER_HOME/EER_PUBLICATIONS/CEER_PAPERS/Gas/T ab/C11-GST-15-03_amdt%20GGPSSO%20on%20CAM%20and%20CMP_14-July-2011.pdf.

- 1.5 Our monitoring exercise is based on publicly available data and information provided voluntarily by SSO's. In assessing the degree of transparency of the information provided by the SSO's we took the perspective of a market participant who is aware of the market rules, trading arrangements and regulations of the country where he seeks access to storage capacity. We have presented the requirements of the Art. 19 in the form of a questionnaire and evaluated the availability and completeness of information regarding each question.
- 1.6 Our methodology can be synthesised as follows:
- We identified within the list of European SSOs the facilities that are subject to the transparency requirements and have excluded those that for various reasons may be exempted from the full transparency requirements.
 - We created a detailed list of transparency requirements based on Art. 19 of Regulation EC 715/2009 and on GSE's views on its implementation;
 - We researched the public information available on the websites of each SSO concerning each storage facility or a group of storage facilities to verify fulfilment of each of the requirements;
 - Where information was not found on the website, we have followed up by email and by phone with the SSO to obtain the missing information and/or to investigate the reasons why those information where not published;
- 1.7 Further, the report summarises the most common transparency issues we have identified.

Findings and recommendations

- 1.8 The audit was performed on the remaining 113 facilities operated by 48 SSOs representing the working TPA gas volume of 77 Bcm after excluding facilities that are not currently operational and facilities that appear to be exempted from the SSO transparency requirement.³
- 1.9 Most of the audited European Storage System Operators are in perfect compliance with the transparency requirements of the Article 19 of the regulation 715/2009 or feature minor departures from perfect compliance.
- 1.10 Compliance requiring major improvement has been observed with 5 SSOs in 5 countries operating 14 facilities with a total storage capacity of 5.8 Bcm.

³ Facilities used for production use only, facilities used for LNG peak shaving and facilities under TPA exemption.

- 1.11 The performed audit has revealed that the areas of transparency that need improvement the most are the clarity and the ease of access to the information required by the regulation. In cases where the required information was provided, it was often not immediately available and finding this information on the SSOs website has often required additional efforts. In particular, this concerns situations where the required information is not directly posted on the SSO's website, but rather is published by other entities (e.g. national regulator's network code). This often creates the following obstacles to transparency:
- Navigation of the SSO's websites is often unclear as to what document contains information required under Article 19;
 - The information required under Article 19 is often dispersed within a document or documents describing much wider aspects of gas infrastructures regulation. One then needs to locate and collect the information concerning storage within these documents.
- 1.12 In our view, these situations require improvement in order to meet the requirements of the Article 19(3). Furthermore, even though Article 19 does not explicitly request publishing information in English language, in our view, providing the information relevant to Article 19 in English would much improve transparency.
- 1.13 TPA exempted facilities, facilities used for LNG peak shaving and facilities used for production purposes often do not provide information under Article 19. This audit does not consider such facilities because it is unclear whether the transparency requirements apply to them. However, the websites of relevant SSOs often do not mention the special status of these facilities. Therefore, unless this status is confirmed elsewhere, one may consider the absence of information as non-compliance with the transparency requirements under Article 19.

Outline of the report

- 1.14 The report is organised as follows. In Section 2 we describe and interpret the requirements of Art. 19 of Regulation EC 715/2009. In Section 3 we present the list of transparency requirements that we created in order to assess compliance to Art. 19 of by the SSO's. In Section 4 we report the results of our assessment and develop recommendations to increase the degree of transparency by the SSO's.

Section 2

Requirements and implementation of Article 19 of regulation 715/2009

Introduction

- 2.1 This section describes the transparency requirements stipulated by Article 19 of regulation 715/2009. In addition we provide the interpretation of how these requirements based on the internal discussion document of GSE⁴.

Article 19 (1)

Provision

- 2.2 Art. 19 (1) states that :

“LNG and storage system operators shall make public detailed information regarding the services it offers and the relevant conditions applied, together with the technical information necessary for LNG and storage facility users to gain effective access to the LNG and storage facilities”.

Implementation

- 2.3 For the purpose of implementation GSE has developed the following reading of the Article 19 (1) of Regulation 715/2009:

- *“detailed information regarding the services”*: the characteristics of the storage services offered (firm/interruptible, injection/ withdrawal rate), including basic and additional services (if relevant);
- *“the relevant conditions applied”*: the general terms and conditions which would typically include operational aspects of the use of services and legal pre-conditions (for instance, whether holding a supply and a transmission contract is a precondition to request storage services); and

⁴ GSE, GSE Views on Implementation of Regulation 715/2009, 19 June 2011, available at: www.gie.eu.

- “technical information necessary for effective access”: qualitative conditions for a user to gain access (for instance gas quality aspects and technical connection points and aspects related to that). This information should be complemented with information of the allocation system (covered already by Article 17).

2.4 According to GSE, this information should be made available on the website of the Storage Operator in the Terms and Conditions/Storage Code.

Article 19 (2)

Provision

2.5 Article 19 (2) states that :

“For the services provided, LNG and storage system operators shall make public information on contracted and available storage and LNG facility capacities on a numerical basis on a regular and rolling basis and in a user-friendly standardised manner”.

Implementation

2.6 The SSO should publish information on booked and available capacity over a timeframe in line with the applicable allocation system and should update it as soon as any values change. The information should be published on a numerical basis and in absolute terms. The publication of information should follow a logical and comprehensible pattern so as to allow its clear interpretation. This information should at least be published online on the SSO’s website and be freely accessible.

Article 19 (3)

Provision

2.7 Article 19 (3) states that:

“LNG and storage system operators shall always disclose the information required by this Regulation in a meaningful, quantifiably clear and easily accessible way and on a non-discriminatory basis”.

Implementation

- 2.8 The information should be published on a numerical basis – i.e. not as (for instance) a percentage representation. The information should also be easily accessible – the web-presentation of the information online should be clear and easy to follow (which boils down mainly to the way data is organized in the website). It should include information regarding terms and conditions without prejudice to the discretion of SSO to determine the format in which such information is made available – e.g. in Terms and Conditions sheet, in a Storage Code, etc.
- 2.9 According to GSE the non-discrimination requirement is fulfilled by publishing the information in a section of the SSO’s website with no access restrictions.

Article 19 (4)

Provision

- 2.10 Art. 19 (4) states that:

“LNG and storage system operators shall make public the amount of gas in each storage or LNG facility, or group of storage facilities if that corresponds to the way in which the access is offered to system users, inflows and outflows, and the available storage and LNG facility capacities, including for those facilities exempted from third-party access. That information shall also be communicated to the transmission system operator, which shall make it public on an aggregated level per system or subsystem defined by the relevant points. The information shall be updated at least daily. In cases in which a storage system user is the only user of a storage facility, the storage system user may submit to the national regulatory authority a reasoned request for confidential treatment of the data referred to in the first subparagraph. Where the national regulatory authority comes to the conclusion that such a request is justified, taking into account, in particular, the need to balance the interest of legitimate protection of business secrets, the disclosure of which would negatively affect the overall commercial strategy of the storage user, with the objective of creating a competitive internal gas market, it may allow the storage system operator not to make public the data referred to in the first subparagraph, for a duration of up to one year. The second subparagraph shall apply without prejudice to the obligations of communication to and publication by the transmission system operator referred to in the first subparagraph, unless the aggregated data are identical to the individual storage system data for which the national regulatory authority has approved non-publication”.

Implementation

- 2.11 This article obliges the SSO to publish information on daily stock level, available storage capacities, injection and withdrawal data in a format consistent with the way capacities are marketed (per facility or per group of facilities) including information for TPA-exempted facilities according to Article 30 b).
- 2.12 This data should also be communicated to the TSO who in turn publishes the data in an aggregated manner. GSE notes that the publication by the TSO does not release the SSO from the publication obligation. The previously applicable “3 minus rule” becomes a “1 minus rule” where only in case a storage facility is used by a single customer the confidentiality of the data can be ensured based on a prior approval by the NRA. In case an exemption from the publication of the data has been granted, the TSO is obliged to respect it if the data would be identical to the individual data for which non-publication has been approved, otherwise the TSO should aggregate the data with other users’ and storage operators’ data. It is up to the SSO and the TSO to agree on the data transfer protocol to be used for the purpose of data publication.

- 2.13 Information should be online, freely accessible (save for the case where an exemption from the publication has been obtained) in a user friendly format (typically including a download function).

Article 19 (5)

Provision

- 2.14 Article 19 (5) states that :

“In order to ensure transparent, objective and non-discriminatory tariffs and facilitate efficient utilisation of the infrastructures, the LNG and storage facility operators or relevant regulatory authorities shall make public sufficiently detailed information on tariff derivation, the methodologies and the structure of tariffs for infrastructure under regulated third-party access”.

Implementation

- 2.15 In the case of regulated storage access regime, an SSO or NRA should publish information on tariff derivation and their structure (components) according to the methodology agreed at a national level. The decision on who publishes this information should be agreed beforehand with the NRA. Irrespectively of the above, the SSO is obliged to publish tariffs.
- 2.16 Information should be published online and be made freely accessible.

Section 3

Methodology of the transparency audit

Scope of the audit

- 3.1 For the purposes of this audit, GSE has provided us a list of 135 storage facilities operated by 64 different SSOs in 19 EU member countries. The complete list is presented in Annex 1. Of these facilities, we have identified that 4 are not currently operational and are therefore excluded from assessment⁵.
- 3.2 Further, we have identified 18 facilities operated by 12 SSOs that operate under a regime that does not seem to require full compliance with the SSO transparency requirement. Categories of such storages include:
- Facilities used for production use only;
 - Facilities used for LNG peak shaving;⁶
 - Facilities under different regulatory regime (TPA exemption).
- 3.3 It is unclear what information about such storage facilities is expected to be provided under Article 19. Therefore, we only analyse compliance with transparency requirements excluding these facilities.
- 3.4 The audit was performed on the remaining 113 facilities operated by 48 SSOs representing the working TPA gas volume of 77 Bcm.

Transparency requirements

- 3.5 We have assessed compliance by each SSO with respect to a set of transparency requirements identified in cooperation with GIE. The first screening was based on the information published on their websites. In cases of questions unresolved from the information available on the website, we have followed up with emails and phone calls.

⁵ One of these is a duplicate entry reflecting the co-ownership of the same storage that is managed by the single operator

⁶ Facilities used for LNG peak shaving and for production use were identified with the help of GSE,

- 3.6 The questionnaire used to collect and organize the information on the degree of fulfilment of the transparency requirement by each SSO is presented in the following paragraphs. The questionnaire comprises four sections. Each of the sections corresponds to one provision of Art. 19 of Regulation 715/2009, except for the second section which combines the provisions of both Art. 19 (2) and (4).

First section: availability of the information regarding products, services and conditions

- 3.7 The first section of the questionnaire verifies for each of the storage facility, if the SSO provides the information on the offered products, the services and conditions. Its covers Article 19 (1) of regulation 715/2009. Section 1 contains the following questions:
- Are offered products clearly indicated (in particular the type of service: seasonal storage, modulation; firm, interruptible)?
 - Is the process of the request for service explained?
 - Is the demand rationing rule explained (e.g. auction, proquota, rationing)?
 - Are other terms and conditions are indicated? (e.g. invoicing times, collaterals, notification times, gas quality, interconnection points with the transmission system ...)

Second section: availability of the information on volumes

- 3.8 The second section of the template analyzes if for each of the storage facility, the SSO provides the information on the technical capacity, the available volume as well as the current use of the capacity. It covers Article 19 (2) and (4) of regulation 715/2009. Section 2 contains the following questions:
- Is the information on technical capacity of volume, injection and withdrawal provided?
 - Is the information on available volume, injection and withdrawal capacity provided for each offered product?
 - Is the information on the daily use of capacity available (volume of gas in storage, inflows and outflows) provided?

Third section: availability of the information on prices

- 3.9 The third section of the template analyzes if for each of the storage facility, the SSO's website provides the information on the storage capacity price, the injection and withdrawal price and the penalties, for instance for use of capacity above the contracted. It covers Article 19 (5) of regulation 715/2009. Section 3 contains the following criteria:
- Is the information about storage capacity price available (e.g. in terms of €/MWh/year)?

Fourth section: ease of access to the information

3.10 The fourth section of the template provides information on the accessibility of the information provided by each SSO. It covers Article 19 (5) of regulation 715/2009. Section 3 contains the following questions:

- Is the information provided on the website easily accessible? (information easy to find; easy to understand)
- Is information available with no access restrictions?

Analysis of the results

3.11 We analyse transparency by attributing to each facility the numbers of transparency points equal to the number of positive answers of the questionnaire as a result of the review of the information available on operator's website. Further we analyse the distribution of points by number of facilities and the volume of working gas.

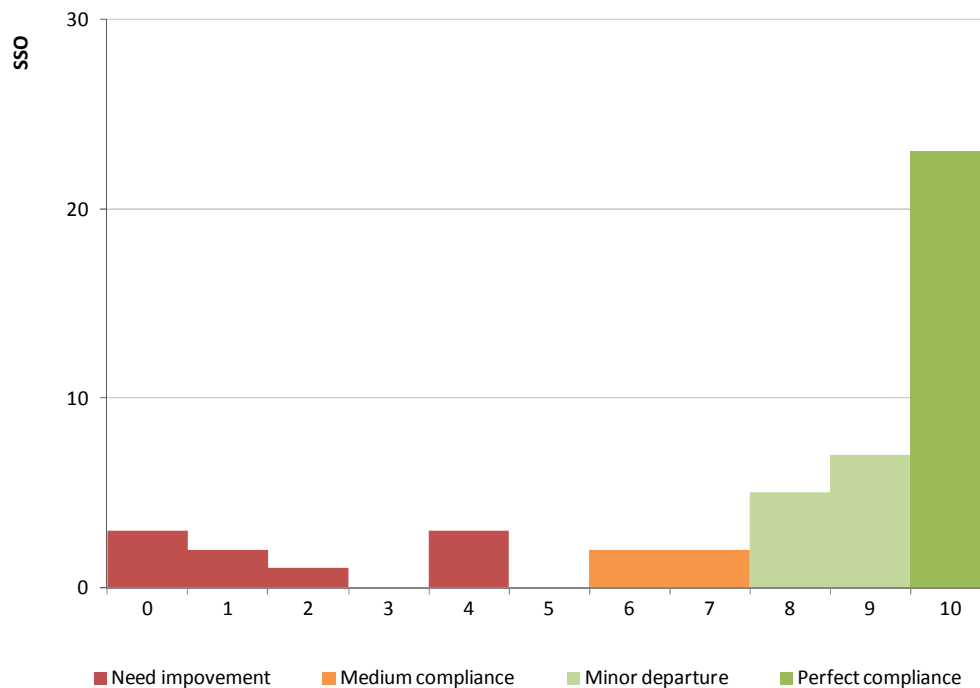
Section 4

Results of the monitoring exercise

Overall assessment

- 4.1 We first present the overall assessment of transparency based on the number of positive questionnaire answers over 48 SSOs that are operational and do not seem to fall under particular regulatory regimes. According to GSE data, these facilities represent 77 Bcm of TPA volumes of working gas.
- 4.2 Figure 1 below presents the distribution of the number of transparency points by the number of storage facilities.

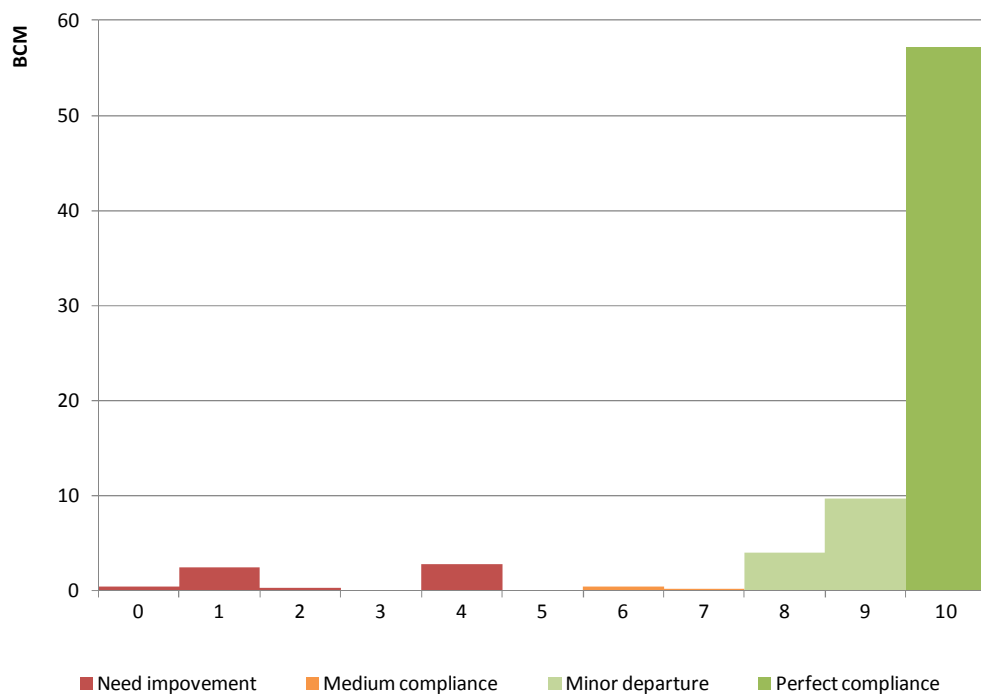
Figure 1: Overall compliance assessment by number of SSOs



Source: Analysis of Compass Lexecon

- 4.3 The figure suggests that 23 SSOs have a perfect compliance, having received the maximum amount of positive answers. Another 12 SSOs feature minor departures from perfect compliance, having one or two negative questionnaire answers out of ten. Further, there are 4 SSOs with medium compliance (5-7 transparency points) and 9 SSOs with compliance that needs improvement (0-4 points).
- 4.4 Figure 2 below shows the distribution of compliance points by TPA volume of working gas according to the GSE data.

Figure 2: Overall compliance assessment by volume of storage



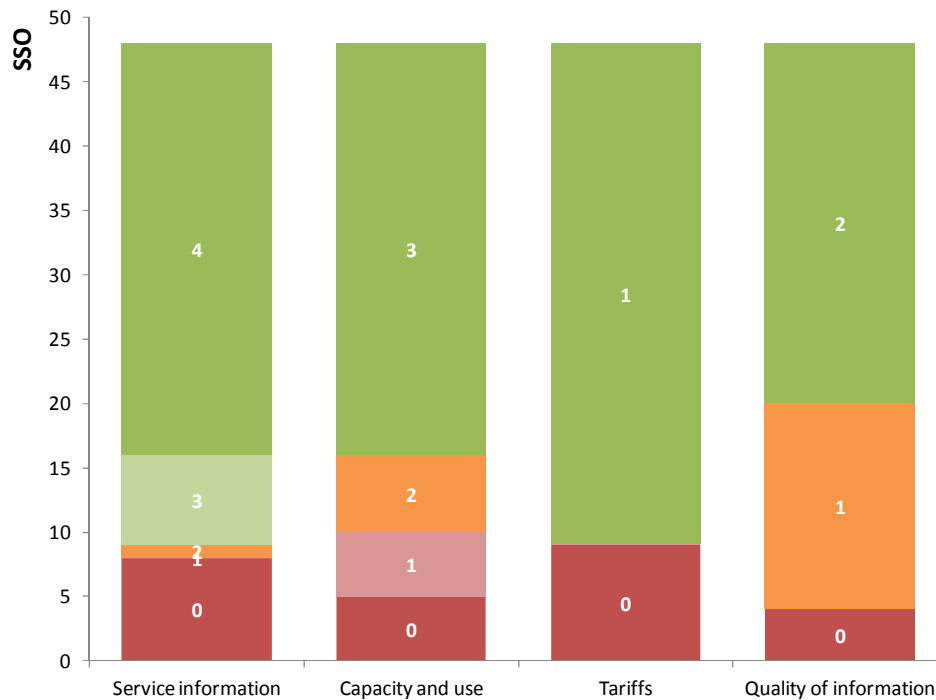
Source: GSE, Analysis of Compass Lexecon

- 4.5 The figures suggests that storage facilities with perfect compliance or compliance with minor departure (8-10 points) represent 70.8 Bcm. Facilities with medium compliance or those where compliance needs improvement (0-7 points) represent 6.2 Bcm, of which 5.8 Bcm with (0-4 points) .
- 4.6 Comparison of the two measures of compliance suggests that facilities with transparency compliance issues are typically smaller than those that have perfect compliance or compliance with minor departures.

Assessment of transparency compliance by area of monitoring

4.7 Figure 3 below presents the distribution of the transparency points that we have awarded to storage facilities during the audit within each area of monitoring. For each group of questions identified in Section 3 the figure presents the distribution of the number of points collected by the storage facilities.

Figure 3: Compliance points by category of questions (number of SSOs)



Source: Analysis of Compass Lexecon

4.8 Compliance with storage transparency requirement varies slightly across different areas of transparency (e.g. different paragraphs of Article 19):

- Information concerning the offered Service is mostly either available almost fully (3-4 points) or is nearly missing (0 points).
- The information on available and used capacity is more often incomplete (1-2 points) than missing (0 points).
- Pricing information is available in 90% of the facilities.

- Finally, the Quality of Information being a subjective question has received a substantial number of partial compliance evaluations (one third of SSOs) typically because of the language issues or difficulty to find necessary information on the website.

Conclusion and observations

Conclusion on the TPA storage facilities

- 4.9 Most of the European Storage System Operators that provide third-party access and that are not excluded from the analysis as being LNG peak-shaving facility or a facility exclusively for production use are in perfect compliance with the transparency requirements of the Article 19 of the regulation 715/2009 or feature minor departures from perfect compliance.
- 4.10 Compliance needing major improvement has been observed with 5 SSOs in 5 countries operating 14 facilities with a total storage capacity of 5.8 Bcm.
- 4.11 The performed audit has revealed that the areas of transparency that need improvement the most are the clarity and the ease of access to the information required by the regulation. In cases where the required information was provided, it was often not immediately available and finding this information on the SSOs website has often required additional efforts. In particular, this concerns situations where the required information is not directly posted on the SSO's website, but rather is published by other entities (e.g. national regulator's network code), This often creates the following obstacles to transparency:
- Navigation of the SSO's websites is often unclear as to what document contains information required under Article 19;
 - The information required under Article 19 is often dispersed within a document or documents describing much wider aspects of gas infrastructures regulation. One then needs to locate and collect the information concerning storage within these documents.
- 4.12 In our view, these situations require improvement in order to meet the requirements of the Article 19(3). Furthermore, even though Article 19 does not explicitly request publishing information in English language, in our view, providing information relevant to Article 19 in English would much improve transparency.

- 4.13 TPA exempted facilities, facilities used for LNG peak shaving and facilities used for production purposes often do not provide information under Article 19. This audit does not consider such facilities because it is unclear whether the transparency requirements apply to them. However, the websites of relevant SSOs often do not mention the special status of these facilities. Therefore, unless this status is confirmed elsewhere, one may consider the absence of information as non-compliance with the transparency requirements under Article 19.

Annex 1. List of the storage facilities

Facility number	Facility/facility grouping	Company	Country	Comment
1	Schönkirchen / Reyersdorf	OMV Gas Storage	Austria	
2	Tallesbrunn	OMV Gas Storage	Austria	
3	Thann	OMV Gas Storage	Austria	
4	Puchkirchen	RAG	Austria	
5	Aigelsbrunn	RAG	Austria	
6	Haidach 5	RAG	Austria	
7	Haidach	RAG/Wingas/Gazprom Export	Austria	
8	7Fields	RAG / E.ON. Gas Storage	Austria	
9	Loenhout	Fluxys	Belgium	
10	Chiren	Bulgartransgaz	Bulgaria	
11	Háje	RWE Gas Storage	Czech Republic	
12	Třanovice	RWE Gas Storage	Czech Republic	
13	Štramberk	RWE Gas Storage	Czech Republic	
14	Tvrdonice	RWE Gas Storage	Czech Republic	
15	Dolní Dunajovice	RWE Gas Storage	Czech Republic	
16	Lobodice	RWE Gas Storage	Czech Republic	
17	Uhřetice	MND Gas Storage	Czech Republic	
18	Dolní Bojanovice	SPP Bohemia	Czech Republic	
19	Lille Torup	Energinet.dk Gaslager	Denmark	
20	Stenlille	DONG Storage	Denmark	
21	SERENE Nord/ PITS Nord Est	Storengy	France	
22	SEDIANE Littoral, SERENE Littoral/PITS Nord Atlantique	Storengy	France	
23	SEDIANE Sud, SERENE	Storengy	France	

Sud/PITS Sud Atlantique			
24	SEDIANE Nord/PITS Nord Ouest	Storengy	France
25	SEDIANE B/PITS Nord B	Storengy	France
26	SALINE/PITS Sud Est	Storengy	France
27	Manosque	Geomethane	France
28	Izaute	TIGF	France
29	Lussagnet	TIGF	France
30	Krummhörn	E.ON. Gas Storage GmbH (EGS)	Germany
31	Epe EGS H-Gas	E.ON. Gas Storage GmbH (EGS)	Germany
32	Epe EGS L-Gas	E.ON. Gas Storage GmbH (EGS)	Germany
33	Hähnlein	E.ON. Gas Storage GmbH (EGS)	Germany
34	Stockstadt	E.ON. Gas Storage GmbH (EGS)	Germany
35	Bierwang	E.ON. Gas Storage GmbH (EGS)	Germany
36	Etzel ESE	E.ON. Gas Storage GmbH (EGS)	Germany
37	Etzel Erdgas Lager EGL	EGS (share)	Germany
38	Sandhausen	EGS (share)	Germany
39	Epe RGS L-Gas	RWE Gasspeicher GmbH	Germany
40	Epe RGS H-Gas	RWE Gasspeicher GmbH	Germany
41	Kalle	RWE Gasspeicher GmbH	Germany
42	Xanten	RWE Gasspeicher GmbH	Germany
43	Stassfurt	RWE Gasspeicher GmbH	Germany
44	Uelsen	Storengy Deutschland	Germany
45	Harsefeld	Storengy Deutschland	Germany
46	Breitbrunn/Eggstätt	EGS	Germany
47	Peckensen	Storengy Deutschland	Germany
48	Fronhofen-Trigonodus	Storengy Deutschland	Germany

49	Buchholz	VNG Gasspeicher GmbH	Germany	
50	Bernburg	VNG Gasspeicher GmbH	Germany	
51	Bad Lauchstädt	VNG Gasspeicher GmbH	Germany	
52	Kirchheiligen	VNG Gasspeicher GmbH	Germany	
53	Katharina	Erdgasspeicher Peissen GmbH	Germany	Not operational
54	Lehrte	E.ON Avacon	Germany	Not operational
55	Allmenhausen	E.ON Thüringer Energie	Germany	
56	Eschenfelden	EGS (share)	Germany	
57	Eschenfelden	N-ERGIE (share)	Germany	
58	Empelde	GHG	Germany	
59	Wolfersberg	Bayerngas	Germany	
60	Inzenham-West	RWE Dea Speicher	Germany	
61	Rehden	Wingas	Germany	
62	Huntorf L	EWE	Germany	
63	Nüttermoor L	EWE	Germany	
64	Nüttermoor H	EWE	Germany	
65	Rüdersdorf H	EWE	Germany	
66	Schmidhausen	Stadtwerke München	Germany	
67	Frankenthal	Enovos - subsidiary of Creos	Germany	
68	Berlin	Berliner Gaswerke (GASAG)	Germany	
69	Kiel-Rönne	Stadtwerke Kiel	Germany	
70	Kiel-Rönne	EGS/E.ON Hanse/Kiel Stadtwerke (owner)	Germany	
71	Kraak	EGS/E.ON Hanse (owner)	Germany	
72	Hamburg Reitbrook	EGS/E.ON Hanse/Storengy (owner)/Exxon Mobil (owner)	Germany	
73	Reckrod	Gas Union	Germany	
74	Sandhausen	EGS for GVS (share)	Germany	
75	Bremen-Lesum	Bremen Stadtwerke	Germany	TPA exemption

76	Bremen-Lesum	ExxonMobil	Germany	TPA exemption
77	Szöreg-1	MMBF	Hungary	
78	Pusztaderics	E.ON Földgáz Storage	Hungary	
79	Zsana-Nord	E.ON Földgáz Storage	Hungary	
80	Kardoskút-Pusztaszolos	E.ON Földgáz Storage	Hungary	
81	Hajdúszoboszló	E.ON Földgáz Storage	Hungary	
82	Kinsale Southwest	Kinsale Energy	Ireland	
83	Collalto	Edison Stoccaggio	Italy	
84	Cellino	Edison Stoccaggio	Italy	
85	Brugherio	STOGIT	Italy	
86	Settala	STOGIT	Italy	
87	Sergnano	STOGIT	Italy	
88	Ripalta	STOGIT	Italy	
89	Cortemaggiore	STOGIT	Italy	
90	Minerbio	STOGIT	Italy	
91	Sabbioncello	STOGIT	Italy	
92	Fiume Treste	STOGIT	Italy	
93	Incukalns	Latvijas Gaze	Latvia	
94	Maasvlakte	Gasunie	The Netherlands	LNG peak shaving
95	Zuidwending I	Gasunie Zuidwending	The Netherlands	
96	Grijpskerk	NAM	The Netherlands	Production use only
97	Norg (Langelo)	NAM	The Netherlands	Production use only
98	Alkmaar	TAQA Energy BV	The Netherlands	Production use only
99	Mogilno	PGNiG	Poland	
100	Wierzchowice	PGNiG	Poland	
101	Swarzow	PGNiG	Poland	
102	Brzeznicza	PGNiG	Poland	
103	Husow	PGNiG	Poland	
104	Strachocina	PGNiG	Poland	
105	Bonikowo	PGNiG	Poland	Production use only
106	Daszewo	PGNiG	Poland	Production use only

107	Carrico	REN Armazenagen	Portugal	
108	Carrico	Transgás Armazenagem	Portugal	
109	Nades-Prod-Seleus	Amgaz	Romania	Not operational
110	Tirgu-Mures	Depomures	Romania	
111	Sarmasel	Romgaz	Romania	
112	Cetatea de Balta	Romgaz	Romania	
113	Bilciuresti	Romgaz	Romania	
114	Urziceni	Romgaz	Romania	
115	Ghercesti	Romgaz	Romania	
116	Balanceanca	Romgaz	Romania	
117	UGS Lab complex(incl. Gajary baden)	Nafta	Slovakia	
118	Láb IV	Pozagas	Slovakia	
119	Serrablo	Enagas	Spain	
120	Gaviota	Enagas	Spain	
121	Barcelona	Enagas	Spain	LNG peak shaving
122	Huelva	Enagas	Spain	LNG peak shaving
123	Cartagena	Enagas	Spain	LNG peak shaving
124	Marismas	gasNatural fenosa	Spain	
125	Bilbao	BBG (Enagas, RREEF)	Spain	LNG peak shaving
126	Sagunto	Saggas	Spain	LNG peak shaving
127	Ferrol	Reganosa	Spain	LNG peak shaving
128	Skallen	Swedegas	Sweden	
129	Avonmouth	NationalGrid LNG Storage	UK	TPA exemption
130	Rough	Centrica Storage	UK	
131	Humbly Grove	Humbly Grove Energy Ltd	UK	TPA exemption
132	Hole House Farm	EDF Trading (EDFT)	UK	
133	Hatfield Moor	Scottish Power	UK	TPA exemption
134	Hornsea	SSE (Scottish & Southern)	UK	
135	Aldbrough	SSE / StatoilHydro	UK	TPA exemption