

The French Energy Regulatory Commission (CRE) consults market participants.

PUBLIC CONSULTATION NO 2022-05 OF 13 JULY 2022 RELATING TO THE RULES FOR MARKETING NATURAL GAS STORAGE CAPACITIES AS OF OCTOBER 2022

Translated from the French: only the original in French is authentic

Background

Since the reform of the third-party access regime to underground natural gas storage capacity came into force on 1st January 2018, most of this capacity has been sold by auction. The auction rules for the marketing of storage capacities in force today were set by the Energy Regulation Commission (CRE) in its deliberation No 2018-202¹.

These auction procedures are set to achieve two main objectives: firstly, to maximise the volume of capacity sold, in order to ensure security of supply. Secondly, they must maximise the revenue generated by the sale of these capacities, in order to reduce the amount of the storage compensation.

While the current marketing rules were previously considered satisfactory by market participants and storage operators, the evolution of the market conditions since the second half of 2021 has made the marketing campaign between June 2021 and March 2022 more difficult.

Stoerengy and Teréga have therefore drawn up several proposals to modify the rules for marketing storage capacity, mainly seeking to make the system more flexible in order to adapt it to current, more volatile market conditions.

CRE agrees with the operators' assessment of the last marketing campaign. It also considers appropriate to question the relevance of the current marketing rules in the light of recent market developments.

Thus, the purpose of this public consultation is to present proposals for changes to the rules for marketing storage capacity from October 2022. It is based on the storage operators' proposal, drawn up following a consultation of the stakeholders held on 17 May 2022. The storage operators' proposal is annexed to the public consultation.

Following this public consultation, CRE intends to take a decision modifying the rules for the commercialisation of natural gas storage capacities.

Paris, 13 July 2022

For the Energy Regulatory Commission,
A Commissioner,

Catherine EDWIGE

¹ Deliberation of the French Energy Regulatory Commission of September 27, 2018 deciding on the methods for marketing natural gas storage capacities as of October 2018

To participate in consultation process

CRE invites interested parties to send in their contribution, by 5 September 2022 at the latest, entering it on the platform set up by CRE: <https://consultations.cre.fr>.

For the purpose of transparency, contributions will be published by CRE.

If your contribution contains elements that you wish to keep confidential, a version concealing those elements should also be provided. In this case, only that version will be published. CRE reserves the right to publish elements that could be essential for all participants, provided that they are not secrets protected by law.

In the absence of a redacted version, the full version will be published, except for information falling under secrets protected by law.

Interested parties are invited to provide well-grounded answers to the questions.

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1. BACKGROUND AND FEEDBACK FROM THE PREVIOUS AUCTIONS

1.1 Background

In application of article L. 421-5-1 of the Energy Code, the capacities of the storage facilities are subscribed following public auctions. The terms and conditions of these auctions, which include in particular the schedule for marketing capacities, the reserve prices of the auctions, the products marketed, and the type of auctions implemented, are set by CRE on the proposal of the storage operators.

The rules for the marketing of storage capacity currently in force are set out in deliberation No 2018-202².

The rules for marketing storage capacity are determined with the main objective of maximising the volumes of capacity subscribed, in order to ensure France's security of supply. This is particularly important in the current context. The marketing procedures must also help maximising the revenue collected from the sales, in order to limit the amount of storage compensation that is collected at the national exit points of the transmission system and ultimately passed on to gas consumers. Finally, these terms and conditions must also be simple, intelligible, and transparent for the players and promote competition on the French gas market.

During the consultation meeting on 29 June 2021, feedback from the various players involved highlighted the stakeholders' satisfaction with the current rules, which have resulted in satisfactory participation in the auctions and consistency between the auction prices and the spreads.

However, the market context deteriorated significantly from the second half of 2021. The global balance between gas supply and demand remained particularly tense, notably due to the persistence of strong Asian demand for LNG, the drop in Russian gas exports to Europe, incidents on gas infrastructures and an increase in demand for gas for thermal power generation to replace coal. From the end of the year onwards, the European markets experienced increased volatility, particularly in relation to successive announcements by the Russian government concerning its gas exports to Europe. Finally, the beginning of 2022 was marked by Russia's invasion of Ukraine, which further pushed up prices and volatility in European markets and posed a significant risk to the security of supply of the entire region.

This market situation has had a significant impact on the marketing campaign conducted by storage operators between November 2021 and June 2022.

1.2 Feedback from the previous auctions

1.2.1 Results

The demand for storage capacity for a given year depends mainly on the summer/winter spread for that year at the time of the auction, minus the storage costs (PITS tariff, gas immobilisation costs). While market conditions were comparable to previous years until June 2021, the summer/winter spread for the period 2022/2023 then fell sharply, with a significant impact on the marketing campaign for storage capacity for this period, which proved more difficult than in previous years.

Thus, at the end of the initial capacity sale process (i.e. after the February auction), 93% of the capacity had been subscribed. For the first time since 2018, two auctions of Storengy's Serene product organised in February 2022 were partially unsuccessful (7 TWh were unsold).

Storengy organised new auctions until May, which finally resulted in the sale of almost all the capacity offered³. However, most of these auctions were at least partially unsuccessful: Storengy had to organise 14 new auctions to sell the capacities of the Serene product, which were then sold at a zero price.

1.2.2 CRE's analysis

CRE notes that even though the marketing campaign resulted in the sale of almost all of the proposed capacity, some of it was only sold once the injection period had begun and following several unsuccessful auctions.

The marketing campaign was thus held, for the first time since the regulation of storage facilities came into force, under particularly delicate market conditions. CRE therefore shares the storage operators' will to examine the possibility of modifying the current marketing rules to make them more suitable for unfavourable and volatile market conditions, with the aim of not posing a risk to French security of supply.

² [Deliberation of the French Energy Regulatory Commission of September 27, 2018 deciding on the methods for marketing natural gas storage capacities as of October 2018](#)

³ all H-gas storage capacity was sold. The unsold capacity concerns part of the B gas storage capacity, which was nevertheless subscribed at a level that covers the need in the B zone, which is decreasing due to the conversion of the zone to H gas currently under way.

Question 1 What lessons do you draw from the feedback of these auctions?**1.3 Storage consultation group**

A meeting of the storage consultation group was organised on 17 May 2022 by Teréga and Storengy. The main players concerned were able to give their feedback on the auctions organised since November 2021, and to express their positions on the rules of future auctions, particularly in response to the storage operators' proposals. The elements presented by the storage operators during the consultation, and the reports of the exchanges, are published on the storage consultation website⁴.

The storage operators' proposal sent to CRE and the present public consultation are based in particular on these discussions.

2. PROPOSED CHANGES FOR THE MARKETING OF STORAGE CAPACITIES AS FROM OCTOBER 2022**2.1 Initial offering of capacity for sale****2.1.1 Current rules**Timetable of marketing of storage capacities

The initial offering of capacity for sale is conducted annually in four windows of three weeks:

- the November window starts on the 1st Tuesday after November 11th (if November 11th is a Tuesday, the window starts on Tuesday the 18th);
- the January, February and June windows begin on the 2nd Tuesday of the month.

Each window lasts three weeks and is held every week during three days from Tuesday to Thursday. Two days are dedicated to the marketing of Storengy's capacities and one day to those of Teréga. Every year, a rotation changes the days of the week attributed to Storengy and Teréga⁵. Up to three independent auctions (for different products) can take place on an auction day, respecting fixed time slots. A single product is marketed per auction. The three auctions for a D day open at 10:00 on D-1, with the possibility of submitting offers to the auction platform from this time. These three auctions close respectively in D at 11:00, 13:00 and 15:00. The storage operators must use the 11:00 and 15:00 slots in priority, the 13:00 slot serves solely as a supplement. Operators publish the results no later than one hour after the auction.

Publication deadlines

Each year in October, Storengy and Teréga publish the list of products they offer with their specific characteristics (which should notably include the flow reduced to volume) on their website.

At the latest one month before the beginning of the November window, they also publish the detailed timetable of all planned auctions up to the following year's publication.

Given the 8-month period between the 1st multi-annual capacity sales window (November of year N) and the 2nd (June N + 1), storage operators will be able to adjust between -50% and +100% the quantities ultimately marketed in the June window in relation to the quantity published in October of the previous year, within the limit of the daily quantities authorised. They must publish the exact quantity marketed at the latest one month before the beginning of the window.

Marketing limits per deadline and per day

The storage capacity of year N/N+1 (injections from April N) may be marketed from November N-4, with at least 95% remaining to be marketed from November N-3, 80% from November N-2 and 50% from 1st January N.

The January and February N windows are exclusively reserved for the marketing of the year N/N+1 storage capacities.

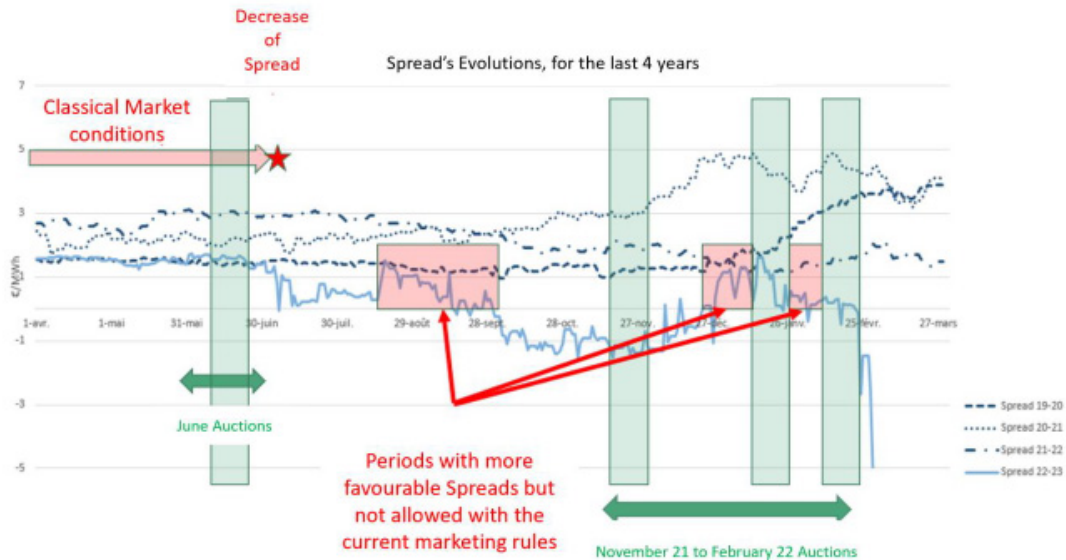
⁴ <https://concertationstockage.com/>

⁵ Teréga thus organised the auctions on Tuesdays during the November 2021 to June 2022 windows, and Storengy on Wednesdays and Thursdays. During the previous campaign, Storengy's auctions were held on Tuesday and Wednesday, and Teréga's on Thursday.

Storengy and Teréga must market a maximum of 10 TWh per day of capacity N during the June N-1, November N-1, January N and February N windows, excluding B-gas storage, and maximum 5 TWh per day for all other maturities in the November and June windows.

2.1.2 Operators' proposal

The operators consider that the current marketing arrangements do not allow them to adapt sufficiently to difficult market conditions such as those observed during the 2021/2022 auction campaign. For example, the obligation to market all capacities during four single windows announced in October does not allow sales to be optimised according to market conditions, as illustrated by the diagram below produced by Teréga and Storengy. This is problematic when market conditions are unfavourable for storage subscriptions during a window.



In a difficult market situation, operators consider that these constraints accentuate the risk of unsold capacities at the beginning of the storage year, which creates a risk for security of supply. The probability of triggering the safety net provided for in Article L. 421-6 of the Energy Code is therefore increased. Moreover, under these conditions, the current system does not make it possible to maximise the revenue from auctions, and thus to minimise the level of storage compensation.

Teréga and Storengy therefore wish to make the conditions for the initial marketing of capacity more flexible, and propose the changes set out below.

Timetable of marketing of storage capacities

Storengy and Teréga propose to keep the January and February auction windows, consisting of three weeks during which sales are organised from Tuesday to Thursday, with two days reserved for Storengy and one day for Teréga, and an annual rotation of the days of the week between the two operators (Teréga will organise the auctions on Wednesday during the January and February 2023 auctions). The auctions of a year N would be dedicated to the sale of storage capacities for the year N/N+1.

The operators state that these windows are important for suppliers of end customers in France who do not know precisely the consumption characteristics of their portfolio of customers delivered from 1 April until the end of December or the beginning of January. It is therefore necessary to reserve part of the storage capacities for the first quarter of the calendar year, so that these suppliers can participate in auctions to complete their storage capacity purchases if necessary.

Proposal No. 1: the operators propose to suppress the other windows (June and November), and to replace them with an open sale of the rest of the capacity for year N/N+1 before the fixed windows for year N. Storengy and Teréga could thus put the capacities of a year N/N+1 up for sale from November of year N-4, during windows organised every working day of the week, including during the fixed windows of January and February.

Each operator would retain priority on its dedicated day(s) (for the period from October 2022 to September 2023, Wednesday for Teréga and Tuesday and Thursday for Storengy) and could use a slot that was initially reserved for the other operator, but which would ultimately not be used. No operator would have priority on Mondays and Fridays. If one of the operators wishes to organise an auction outside its dedicated days, it will coordinate with the other operator so that there are not two auctions organised in the same sales slot (CRE would arbitrate in the event of disagreement between the operators).

Proposal No. 2: if, at the beginning of the January N window, an operator has more capacity for the year N/N+1 available for trading than its January N and February N windows schedule provides for (e.g. in case of unsold capacity in previous auctions, or if short-term products can be offered), it can complete its auction schedule in the following ways:

- by adding these available capacities to the capacities marketed during the auctions of the same product planned for the January and February windows;
- by using one or more unused auction slots on any working day of the week during or outside these two windows (i.e. before the January window, between the January and February windows or after the February window), with the same rules of coordination between operators as in proposal n° 1.

Publication deadlines

Proposal No. 3: the operators propose to publish the calendar for the January and February windows no later than one month before the start of the January window.

Proposal No. 4: for the rest of the auction slots, as well as for the addition of capacity for an auction of the January and February windows, the operators propose to communicate at the latest two working days (D-2) before an auction organised on D-day. The operators specify that this short notice period is only intended to be used in the event of a particularly critical situation, and that in practice it should be longer in less difficult situations.

Operators also propose to publish, in October of each year, the capacity they plan to market for the coming year.

Marketing limits per deadline and per day

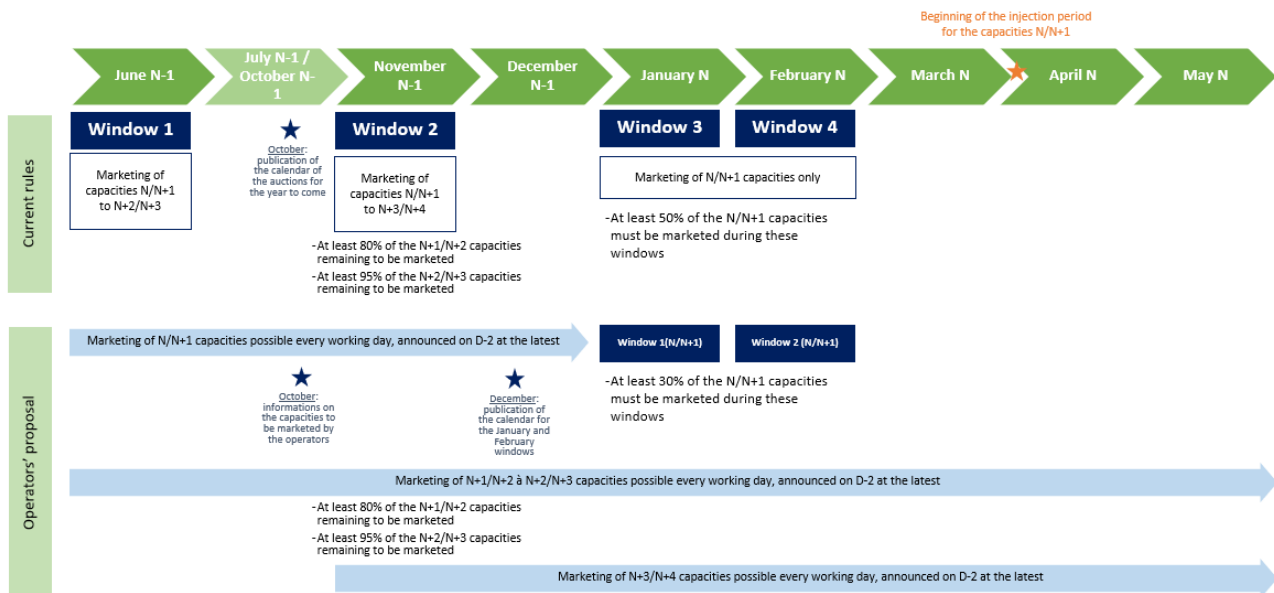
Proposal No. 5: Storengy and Teréga propose to modify the annual caps on marketable capacities for the year N/N+1. The capacities could be put up for sale from November N-4, guaranteeing quotas of available capacities for the following deadlines. It would thus remain to be marketed:

- at least 95% of capacity from November N-3 (unchanged from current rules);
- at least 80% of capacity from November N-2 (unchanged from current rules);
- at least 30% of capacity from January N (50% in the current rules).

Taking into account the feedback from the auctions organised since 2018, the operators consider that a level of 30% of capacities remaining to be marketed from January is sufficient to meet the needs of players who only have visibility on the consumption characteristics of their portfolio of customers delivered from 1 April at the end of December or beginning of January.

Finally, the storage operators wish to keep the limits of a maximum of 10 TWh per day of N/N+1 capacities during the auctions organised from June N-1 onwards (excluding L-gas storage), and a maximum of 5 TWh per day for each of the other deadlines.

The diagram below summarises the storage operators' proposals for the initial release of capacity:



2.1.3 CRE's preliminary analysis

CRE notes that the current marketing rules have so far been deemed satisfactory by storage operators and market players. However, the evolution of the market conditions observed since the second half of 2021 has highlighted certain limits of the current system, in particular in its capacity to adapt to these rapid conjunctural changes. The particularly difficult market conditions during the 2021/2022 marketing year have posed a risk to security of supply, with a significant rate of unsold capacity at the end of the initial marketing phase. CRE therefore considers that the operators are right to question the relevance of the current marketing rules in the light of recent developments in the French and European gas system.

Timetable of marketing of storage capacities

At this stage, CRE is in favour of the operators' proposal concerning the calendar for the initial sale of capacities, as it allows to adapt to unfavourable and volatile market conditions, while ensuring sufficient stability thanks to the conservation of the January and February windows. This ensures that suppliers to end customers in France have access to storage capacity once the characteristics of their customer portfolios are fully known. CRE also considers it necessary to maintain access to fixed windows known in advance, which allow all players to organise their participation in the auctions as well as possible.

CRE notes, however, that the introduction of other windows set freely by operators reduces visibility for market players. This implies more flexibility and reactivity on their part in order to identify sales periods, assess their storage needs and prepare their offers before the auctions. These organisational constraints have a greater impact on smaller players.

Question 2 Are you in favour of abolishing the June and November windows, and introducing slots set freely by operators on all working days (proposal No. 1)?

Question 3 Are you in favour of the operators' proposal concerning the conditions for the sale of additional capacity available from January (proposal No. 2)?

Publication deadlines

As mentioned above, CRE notes that the operators' proposal implies greater flexibility and responsiveness on the part of the market players. The two working day notice period for auctions set freely by storage operators could be detrimental to smaller market players. Following the Storage Consultation meeting, Storengy and Teréga modified

their initial proposal (a notice period of D-1), in order to take into account the remarks expressed by several of the actors present.

At this stage, CRE is in favour of a relatively short notice period in order to preserve the flexibility of the system proposed by the operators. However, it will be attentive to the responses to the present consultation, in order to determine with the market the relevant balance between the flexibility necessary for the sale of capacities, and the need for visibility for the market players.

Question 4 Are you in favour of a two working day notice period before the launch of each auction freely determined by the operators (proposal No. 4)? If not, which period would you consider the most appropriate?

Marketing limits per deadline and per day

The operators propose to reduce the threshold of capacity for the year N/N+1 to be offered for sale at the January and February windows (30% instead of 50% under the current conditions).

At this stage, CRE is in favour of this proposal. Indeed, this level does not *a priori* put at risk the access to storage capacities for suppliers, while allowing operators to limit the risks of unsold capacities.

CRE is considering retaining the obligation for operators to offer for sale at least once the entirety of the storage capacity for the year N/N+1 before the end of February.

Question 5 Are you in favour of the operators' proposal concerning the allocation of capacity that can be marketed at different times (proposal No.5)?

Question 6 Do you have any other comments or suggestions for changes regarding the rules for the initial marketing of storage capacity?

2.2 Market carry-over of unsold capacities

2.2.1 Current rules

If capacities marketed during an auction are not fully allocated because of an inadequate demand, Teréga and Storengy may add the unsold quantity during the following auction of the same product, or during an unused auction slot, while informing of the carry-over with a notice of 3 working days (the total quantity marketed in a day, including carry-over of unsold capacity shall not exceed the daily limits).

At the end of the February N window, the total volume of the storage capacities of year N having been offered, two cases can arise:

- if the minimum thresholds necessary to guarantee security of supply fixed by decree⁶ have not been reached, then the marketing of capacities in the form of standard products continues until these thresholds are reached;
- if these minimum thresholds are reached, or are not published, operators then have the choice to propose or not the potential unsold capacities in the form of non-standard products, as well as in the form of "short-term" products.

In the event when products other than standard products are marketed, operators must publish one week before each sale the precise characteristics of the products offered as well as the associated capacity volumes.

⁶ The provisions of Article L. 421-4 of the Energy Code stipulate that "On the basis of the multiannual forecast balance provided in the Article L. 141-10, the contribution of the various supply possibilities and the forecast demand, the Ministry of Energy sets each year by order the minimum natural gas stocks necessary on November 1 to guarantee the security of natural gas supply during the period between November 1 and March 31. The minimum stocks are defined by a withdrawal rate, location and volume."

2.2.2 Operators' proposal

The operators would like to make the current framework more flexible in order to facilitate the remarketing of unsold storage capacity. Indeed, Teréga and Storengy consider that the current rules limit their reactivity in case of unsold storage capacities when the injection period approaches.

Proposal No. 6: for the remarketing of previously unsold capacities the operators propose to:

- keep the possibility of carrying over unsold capacities to other subsequent slots of the same product, by communicating on working day D-2 at the latest for working day D (within the current limit of 10 TWh traded per day);
- be able to use all the working days of the week during or outside the fixed windows of January and February (i.e. before the January window, between the January and February windows or after the February window) to fix new sales slots by communicating no later than working day D-2 for working day D. The same rules of coordination between operators as in proposal No. 1 would apply here.

Proposal No. 7: starting from the January N window, the operators would also like to be able to replace the unsold N/N+1 annual products with the same products but over a contractual period of 2, 3 or 4 years, starting in N/N+1. Regarding the reserve price during the auction of these multiannual products, they propose to keep the logic that is currently in place and defined in deliberation n° 2018-202, with a reserve price of the multiannual product equal to the average of the reserve prices that would be defined for each of the years of the contract by applying this deliberation.

Proposal No. 8: for the remarketing of unsold capacities, and only after three partially or totally unsuccessful sales, the operators would like to be able to introduce a system of iterative auctions. The operators would thus indicate the successive marketing slots used, as well as the quantity offered for sale (which could exceptionally be higher than 10 TWh). The capacity remaining for sale on each auction would thus decrease according to the quantities allocated on the previous auctions. The communication would be made by the storage operators on working day D-2 (D being the day of the first auction) at the latest.

Proposal No. 9: the operators propose, once the storage year has started, to be able to accommodate their commercial products that have been unsold and market them as non-standard products, even if the minimum natural gas thresholds necessary to guarantee security of supply have not been reached yet. Indeed, Teréga and Storengy point out the physical impossibility of respecting the contractual constraints associated with certain products once the storage year has begun if the players do not already have gas in stock. For example, a minimum contractual filling threshold on August 1 may become unattainable if capacity is purchased after May 15 and if injection does not start until that date. This proposal would therefore allow all players to purchase the products offered and would limit unsold products.

2.2.3 CRE's preliminary analysis

At this stage, CRE is in favour of the operators' proposal concerning the timetable for the remarketing of unsold capacity. It notes, as indicated in section 2.1.3, that the potential use of all working days of the week and a notice period of two working days implies greater flexibility and responsiveness from players. It will therefore be attentive to the feedback from market players to this consultation to ensure that this system meets their needs.

Question 7 Are you in favour of the changes proposed by the operators concerning the timetable for the remarketing of unsold capacity (proposal No.6)?

Regarding multi-year products, CRE considers that they would facilitate the capacity sale for the year N/N+1 when market conditions would not be favourable, by taking advantage of the higher value of the same capacity in the following years. The operators' proposal concerning the setting of the reserve price of these capacities also seems relevant. On the other hand, CRE specifies that this type of product could, in theory, encourage market players not to reserve N/N+1 products.

Moreover, CRE considers it more appropriate to authorise the marketing of these products only at the end of the February N window, so that all capacities for year N/N+1 are offered for sale at least one time prior to that. The aim of multiannual products is to make unsold storage capacity for year N/N+1 more attractive when market conditions are unfavourable. It therefore seems appropriate to wait until the end of the January and February windows and to ensure that these unfavourable conditions persist before offering these multiannual products.

Question 8 Do you agree with CRE's preliminary analysis concerning the sale of multiannual products (proposal No. 7)?

At this stage, CRE is in favour of the operators' proposal to put unsold capacities up for sale in the form of iterative auctions after three totally or partially unsuccessful auctions. This system allows to maximize the possibilities of purchase of capacities by the market participants, and thus to limit the risk of unsold capacities.

Question 9 Are you in favour of the operators' proposal concerning the remarketing of unsold capacities in the form of iterative auctions (proposal No. 8)?

Finally, concerning non-standard products, CRE is in favour at this stage of the operators' proposal to put them on sale once the storage year has begun, even if the minimum natural gas thresholds necessary to guarantee security of supply are not reached, to the extent that the products put on sale during this period are designed to increase the level of capacity subscriptions or to accelerate the injection of gas into storage in order to strengthen security of supply.

Question 10 Do you agree with CRE's preliminary analysis concerning the marketing of non-standard products (proposal No. 9)?

Question 11 Do you have any other comments or suggestions for changes regarding the rules for the marketing of unsold capacity?

2.3 Changes regarding the marketing of short-term products

2.3.1 Current rules

If capacity is technically available, Teréga and Storengy can market after the initial marketing phase, i.e. at the end of the February window, "short-term" products that meet additional market needs. These short-term products do not reduce the capacities offered during the sales of standard products. These products may be offered in particular in case of undergoing work on sites that are brought back into service during the year, counter-seasonal offers, or in the case of available storage capacities that are greater than those anticipated during sales of standard products.

2.3.2 Operators' proposal

Proposal No.10: in order to make the marketing conditions more flexible, the storage operators propose for these short-term products:

- that when a potential sale is published, a period instead of a day of sale is fixed;
- that the initial communication (including all the information on the product as well as the quantity that will be offered for sale) is made at the latest on working day D-2 for a beginning of the sale period starting on working day D;
- that the sale is then confirmed before 10:00 on D-1 for a closing on D at 11:00 or 15:00, thus with a confirmation delay of more than 24 hours.

2.3.3 CRE's preliminary analysis

At this stage, CRE is in favour of the operators' proposal. It allows to adapt as much as possible to the market conditions and to maximize the capacity sales. However, CRE will be attentive to the remarks of the market players concerning the notice period of two working days.

Question 12 Do you agree with the operators' proposal concerning the rules for the short-term products sale (proposal No.10)?

Question 13 Do you have any other comments or suggestions for changes regarding the rules for the short-term capacity sale?

3. SUMMARY OF QUESTIONS

- Question 1** What lessons do you draw from the feedback of these auctions?
- Question 2** Are you in favour of abolishing the June and November windows, and introducing slots set freely by operators on all working days (proposal No. 1)?
- Question 3** Are you in favour of the operators' proposal concerning the conditions for the sale of additional capacity available from January (proposal No. 2)?
- Question 4** Are you in favour of a two working day notice period before the launch of each auction freely determined by the operators (proposal No. 4)? If not, which period would you consider the most appropriate?
- Question 5** Are you in favour of the operators' proposal concerning the allocation of capacity that can be marketed at different times (proposal No.5)?
- Question 6** Do you have any other comments or suggestions for changes regarding the rules for the initial marketing of storage capacity?
- Question 7** Are you in favour of the changes proposed by the operators concerning the timetable for the remarketing of unsold capacity (proposal No.6)?
- Question 8** Do you agree with CRE's preliminary analysis concerning the sale of multiannual products (proposal No. 7)?
- Question 9** Are you in favour of the operators' proposal concerning the remarketing of unsold capacities in the form of iterative auctions (proposal No. 8)?
- Question 10** Do you agree with CRE's preliminary analysis concerning the marketing of non-standard products (proposal No. 9)?
- Question 11** Do you have any other comments or suggestions for changes regarding the rules for the marketing of unsold capacity?
- Question 12** Do you agree with the operators' proposal concerning the rules for the short-term products sale (proposal No.10)?
- Question 13** Do you have any other comments or suggestions for changes regarding the rules for the short-term capacity sale?