

**Comments on the consultation document pursuant to Article 26 of Commission Regulation (EU) 2017/460 of 16 March 2017 establishing a network code on harmonised transmission tariff structures for natural gas ('NC TAR')**

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**1. Observation on Article 5.3**

The Energy Regulatory Office ('ERO') rightly states in Article 5.3 of the consultation document that the introduction of a 100% discount on tariffs for transport to and from gas storage facilities, introduced by ERO by Price Decision No 2/2022 of 10 May 2022 in accordance with Article 9(1) of the NC TAR, had an incentive effect on the storage of gas in storage facilities in the Czech Republic.

However, we consider that instead of removing gas transport bottlenecks for the supply of the Central European region, the situation has worsened by the termination of gas transport to the EU via Ukraine, and the decrease in compression output following the interruption of gas transport by the Nordstream I pipeline, and the damage to the Nordstream I and Nordstream II pipelines, important for the transport of gas in the direction of the Czech Republic, has not yet been replaced (page 124: [Czech Draft Updated NECP 2021 2030 en.pdf](#)). To fill in the missing compression performance, the construction of a new compression station Wittenburg (Three Compressor Units for Compressor Station Wittenburg, Germany: [evergabe.com](#)) and extension of the Rehden compression station (GASCADE [Gastransport GmbH: LBEG grants approval: Construction of the Rehden 2 compressor station begins](#)).

While the end of the application of the German gas storage charge at the beginning of 2025 could have a partially positive effect on gas storage in the Czech Republic, this can be fully compensated by the introduction of a support mechanism for gas storage in the Federal Republic of Germany (Trading Hub Europe: [PowerPoint Presentation](#))

The importance of high filling of gas storage facilities in the Czech Republic for supplying the natural gas market in the winter thus remains relevant.

High filling capacity of gas storage facilities is also required by Regulation (EU) 2017/1938 of the European Parliament and of the Council of 25 October 2017 concerning measures to safeguard the security of gas supply and repealing Regulation (EU) No 994/2010 and the related Commission Implementing Regulations (EU) establishing filling trajectories with intermediate targets for a given calendar year, while the framework for mandatory filling of gas storage facilities in Member States to 90% on 1 November of a calendar year should be extended for further periods at the initiative of the Commission (EU).

We therefore disagree with the statement that the high filling rate of gas storage facilities achieved in

previous years, combined with the above-average warm winter season 2023/2024 and the functionality of market mechanisms for filling gas storage facilities in previous periods, is a reason for reducing the 100% discount on tariffs for transport to and from gas storage facilities in the period consulted.

The current situation on the gas market, in which inverse spreads will make it more difficult to fill gas storage facilities for the 2025/2026 storage season, only underlines the fact that the period of market turbulence still persists and there are no reasons yet for ending the 100% discount scheme on tariffs for transport to and from gas storage facilities.

## **2. Observation on Article 7.4**

For the reasons described in the comment on Article 5.3 of the document consulted, we do not agree with the ERO's proposal to adjust the tariffs for booking transport capacity to and from gas storage facilities at the rate of 80% for the period consulted and we propose to maintain the discount on transport capacity to and from gas storage facilities at the rate of 100% for the entire period consulted.

In connection with the above, we ask the ERÚ to adjust the reference prices of the target model accordingly.