



Storage

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Comments on the draft TAR 2026-2030 Consultation Document pursuant to Article 26 of Regulation (EU) 2017/460 of 16 March 2017 establishing a network code on harmonised transmission tariff structures for gas ('NC TAR')

Dear,

SPP Storage, s.r.o. does not agree with the proposed reduction of the discount for reservation of transport capacity to and from storages from 100 to 80%.

The reasons for our position are as follows:

- The current summer/winter spreads for subsequent storage years are at a level that does not incentivize gas market participants to purchase capacity in gas storage facilities.
- The willingness to use storage capacity by gas market participants is further reduced by the ongoing storage obligation pursuant to Regulation (EU) 2017/1938 of the European Parliament and of the Council of 25 October 2017 concerning measures to safeguard 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 and the subsequent adjustment pursuant to Section 60c et seq. The Energy Law.
- According to the available reported data, the Czech Republic has lost the nature of a gas transit country. Moreover, the Czech Republic is not a sufficiently liquid gas market. In order to ensure security of gas supply, there should be the highest possible incentive for gas market participants to store gas in gas storage facilities located in the Czech Republic.
- If the Czech Republic reduces the discount, storage activities could be transferred to other countries where conditions for gas storage are more advantageous. In this context, we consider it appropriate to mention the introduction of a support mechanism for storage gas the German Federal Republic

https://www.tradinghub.eu/Portals/0/12.11.2024/20250123_SBI_englisch.pdf?ver=JcjYJX2eGqzPwdYwql8ehA%3d%3d.



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- Reducing the discount for booking transport capacity to/from the storage facility will undoubtedly further reduce interest in the use of gas storage facilities.

Dolní Bojanovice on 18. 2. 2025

With thanks

Mgr. Tomáš
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