

REGARDING PUBLIC CONSULTATION ON AMENDMENTS TO REGULATIONS ON THE USE OF INČUKALNS UNDERGROUND GAS STORAGE FACILITY

With this letter UAB Ignitis expresses its opinion to the consultation regarding the amendments to Regulations on the Use of Inčukalns Underground Gas Storage Facility dated 10th of March 2022.

Consultation document	IGN proposal	Comment
<p>Par. 82.⁹¹ “Stocks held in the storage by natural gas users in accordance with 82.⁵ of this Regulation shall be transferred to storage capacity in appropriate quantities the product within which they were stored in the 2021/2022 storage cycle and which the system user has reserved for the 2022/2023 storage cycle in the relevant stocks. ...”</p>	<p>Storage users, having stocks in the storage shall have the possibility to choose the way to carry their stocks to the storage cycle 2022/2023:</p> <ol style="list-style-type: none"> 1. Use Transfer product 2. Utilize capacity product obtained for storage cycle 2022/2023 	<p>Storage users were making commercial decisions with their stocks in the storage and booking next storage cycle capacity based on the storage rules in place at the time of decision making. Namely, evaluating the fact that stocks from one season to another, when storage product expires, is transferred based on transfer product parameters. Storage product for the season 2022/2023 by system users may be obtained for additional volumes in the upcoming injection season. There must be the possibility for the storage user to choose how to transfer their stocks into next season:</p> <ol style="list-style-type: none"> 1. Transfer stocks as a transfer product (even if storage user have obtained next year bundled capacity product) or 2. Use the capacity booked for the storage cycle 2022/2023
<p>Par. 82.⁸¹</p>	<p>Fuel gas consumed during withdrawal season to be recovered from the next season’s tariff.</p>	<p>Fuel gas during withdrawal season is not defined and the procedure for the return of fuel gas is not clear which may lead to uncontrollable costs. Suggest including the costs occurred by the storage operator in the next storage season tariff.</p>

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