

Energie-Control Austria
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Your ref./date

Our ref.

L-I/664-2025-P

File Nr.: 664-2025-GR

Liabile/phone



in Malacky

on 2th May 2025

Subject: Response to the public consultation on the proposed amendments to the Gas – Marketmodell – Verordnung 2020 (GMMO – VO 2020) – Novelle 2025

Dear Ladies and Gentlemen,

We appreciate the possibility to take part in the consultation process for the 2025 amendment of the Gas – Marketmodell – Verordnung 2020 (GMMO – VO 2020) – Novelle 2025.

We would like to propose the addition of the following sentence to §14, section (1a):

“(1a) In the case of the permanent decommissioning of part of a storage facility, the storage system operator shall have the right to reduce the agreed firm or standard capacity booking in proportion to the extent of the decommissioning of the relevant part of the storage facility, with effect no earlier than the first day of the month following such decommissioning.”

We also propose in §14 a new section (2a):

“(2a) Capacity contracts pursuant to paragraph 2 may be terminated by the storage system operator as of the last day of the month following the permanent decommissioning of the storage facility. In the case of the permanent decommissioning of part of a storage facility, the storage system operator shall have the right to reduce the contractually agreed firm or standard capacity booking in proportion to the extent of the decommissioning of the relevant part of the storage facility, with effect no earlier than the first day of the month following such decommissioning.”

Originally proposed wording covers only the option of the permanent decommissioning of the entire storage facility. The wording proposed by POZAGAS a.s. additionally includes the option of decommissioning selected storage reservoirs within the virtual storage facility, i.e. thus the permanent decommissioning of a part of the storage facility.



joint-stock company
Natural gas underground storage

Thank you once again for the opportunity to contribute to the consultation process for the amendment of the Gas – Marketmodell – Verordnung 2020 (GMMO – VO 2020). We would be pleased to discuss our comments with you in more detail.

Kind regards

[Redacted signature block]

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POZAGAS a.s. is recorded in the Commercial Register of the Bratislava I District Court, Volume Sa, Entry 1271/B