

## G. Table for feedback from Uniper Energy Storage Austria

### I. General remarks

Any efforts to further integrate markets are welcomed. We also understand that the model intends to “*increase the attractiveness of the storages in Austria and the Czech Republic*” (page 10). Therefor we want to fully understand the model in context of using storage capacities in the respective other market. Based on our experiences with a storage infrastructure that integrates two markets, transportation costs play an important role. With the BEATE rules introduced recently on the German side the use of storage capacity to integrate markets was made less attractive and therefor contradicts the intention of market integration. Therefore the practical booking procedures and costs of this TRU service are essential to evaluate the possible benefits of this model. For storage connections points we see several questions to be further analyzed in this model.

### II. Specific inputs

*Please write your inputs having regard to the rules of public consultation*

No.	Reference to consultation document	Comment, question, etc.	Justification
1	Specifics of the Austrian and Czech gas markets to be considered, page 4 in context of TRU definition on page 7	Second bullet point on page 4 indicates a congestion free access to storage. This is currently not the case in Austria. Is it correct that TRU will not upgrade the quality of the available transportation capacity?	For 7 Fields connected to the transmission system only interruptible capacity is available. Therefore access to the VTP can't be considered as congestion free.
2	Booking regime on page 4 (last sentence) and TRU allocation on page 8	<p>In context of SCPs, who will be able to book the TRU option (SSO or storage customer)</p> <p>Will there be a PRISMA auction also for storage connection points (SCPs) ?</p> <p>Does TRU also cover SCPs in the distribution system and who should book the TRU option in regard to physical storage capacity at the Entry points in the distribution system?</p> <p>What will be the contract duration (daily,..) of TRU at the SCPs</p>	<p>In Austria the SSO books the transportation capacity from SCP to VHP. In CZ the customer books SCPs)</p> <p>This is currently not the case in AT and CZ for SCPs.</p> <p>Most of storage sites in AT are connected to the distributions system. It seems that AGGM should be involved to prepare a model at the interface between the distribution and transmission system.</p> <p>Transport Capacity in Austria at SCPs can only booked on yearly basis.</p>

3	"TRU flexibility" on page 7	<p>How are "virtual storage points" defined in context of the TRU model.</p> <p>UST Balancing Group delivers physical storage capacities at the VTP (AT). Does this service has access to the CZ VTP with a TRU option?</p> <p>What does a shift to any other entry point in the same transmission system mean ?</p>	<p>All "storage pools" are located in the distribution system.</p> <p>Storage capacity is delivered at the VTP from UGS Balancing Group to the Balancing Group of the customer.</p> <p>Is this necessary in using an access to the other market area ?</p>
4	"TRU definition" on page 7	We understand that TRU does not change the quality of the available transport product. If the storage sites in the distribution system get an access to TRU what will be the quality (firm/interr.) of the so called "Standard capacity" at the VTP in CZ?	
5	Missing evaluation of effects on Security of Supply	In CZ only firm transport capacities are allowed in case the storage obligation is fulfilled outside CZ. Taking into account that only interruptible transport capacities are available at storage connection points in Austria it is highly questionable if storage bookings in Austria can serve as a firm storage booking in CZ.	In AT and CZ different SOS regimes are in place. In contrast to AT, suppliers of protected customers in CZ have a storage booking obligations.

### III. Summarising questions

How would you evaluate the proposed model for Austrian-Czech gas market integration overall?

See answer to general remark

How would you evaluate the proposed services/product for Austrian-Czech gas market integration overall?

For a final assessment of the possible benefits of the model the above mentioned questions shall be further elaborated

Do you share the evaluation of the costs and benefits of an Austrian-Czech gas market integration provided in this document in relation to the development of the gas markets of the Czech Republic/Austria?

SOS effects are missing in the model description, See also question 5

Do you have additional comments or suggestions for enhancement related to the Austrian-Czech gas market integration which you would like to share?

Will the Titel Transfer fee at the VTP be charged double if TRU is used ?

Would you be interested in participating in a dedicated Stakeholder event on the Trading Region Upgrade?

☒ Yes