

Regulatory Authority for Energy (RAE)  
132 Piraeus Street  
118 54 Athens, Greece

Amsterdam, 01 August 2022

## **EFET response to Greece's Preventive Action Plan on gas security of supply and proposed storage obligations**

The European Federation of Energy Traders (EFET<sup>1</sup>) would like to make a further suggestion to improve operability of the market-based and administrative storage obligation options proposed as part of the Preventive Action Plan on Greece's gas security of supply put to consultation by RAE, and to minimize the cost for Greek consumers.

We understand that all three options (commercial storage obligation on suppliers licensed to supply end consumers, reservation of storage capacity by DESFA and use as balancing gas and strategic stocks for gas-fired power producers) involve keeping gas volumes in Italian UGS and importing gas during the withdrawal period by virtual reverse flows through TAP at Nea Mesimvria IP of the NNGS, with unnecessary costs being added to the equation.

One further administrative barrier that complicates the ability to deliver gas to Greece is where a TAP shipper holds capacity to import gas into Italy, there is currently no option to leave the gas in Greece. The shipper must obtain additional backhaul capacity from Italy to Greece, in order to move the gas from the Turkish border into Italy and then back to Greece. Rules around sales of backhaul capacity provide an unnecessary risk and additional costs for such a shipper to sell volumes in Greece while in reality "dropping gas on the way" would reduce the cost for TAP. The automatic right to transfer delivery to an intermediate point, while keeping TAP's revenues whole, would simplify this, and improve integration between Italian and Greek markets. EFET understands that this has previously been considered but was not introduced.

We remain at your disposal should you wish to discuss this flexibility mechanism further.

### **Contact**

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<sup>1</sup> The European Federation of Energy Traders (EFET) promotes and facilitates European energy trading in open, transparent, sustainable and liquid wholesale markets, unhindered by national borders or other undue obstacles. We currently represent more than 100 energy trading companies, active in over 27 European countries. For more information, visit our website at [www.efet.org](http://www.efet.org).