

Energy Traders Europe position to CRE, GRTgaz, Teréga and Storengy on the transmission maintenance planning in France

Energy Traders Europe would like to use the opportunity of the communication of the consolidated maintenance planning for 2024 by GRTgaz and Teréga to express our concerns about the length of the TSO maintenance and reduction rates. Our detailed remarks primarily focus on maintenance at the EO2D and S1 SuperPoints which impact Atlantique and Lussagnet storage facilities and Pirineos VIP connected to Spain. This is because of the impact on shippers' ability to inject and the broader security of supply issue that this lack of flexibility may bring about regarding potential non-compliance with filling obligations under Regulation EU 2022/1032.

Based on the consolidated planning of GRTgaz and Teréga, our shippers estimate that they will face maintenance works for the entire injection campaign, i.e., from the middle of May to the end of October, except for two days in August, at the EO2D and S1 SuperPoints in the southwest of France, including the main storage facilities, Atlantique, Lussagnet, and VIP Pirineos. We consider that, throughout this entire period, all interruptible services and products, especially in the storages, will remain out of service.

Specifically, we identify 172 days of maintenance solely at EO2D (versus 300 from 2020 to 2023, i.e., more than half of maintenance days just for 2024), including 39 days with a probable impact of less than 5%. A similar observation can be made for S1 – 144 days of maintenance published, including 19 days with a probable impact of less than or equal to 6%. Based on historical data, we consider that the mechanisms currently implemented by operators have statistically always made it possible to satisfy shippers' requests daily, at least for these low percentages. However, the services mentioned above remain unavailable and the number of maintenance days continues to increase from year to year., owing to the GRTgaz justification regarding stricter pipeline inspection rules - which have already come into force in 2021 - on account of corrosion risks. This justification cannot alone explain the considerable increase in the number of maintenance days between the 2020-to-2023 and 2024 periods.

Based on the pertinent point in the ATRT8 consultation (page 36), we also understand that the TSO justification is equally related to the inversion of the French flow scheme. The TRF was established in 2018 based on the principle of publishing maintenance in a north-to-south flow scheme, whilst the emergence of new south-to-north limits on the network are presented as an additional constraint to the preparation of maintenance. However, as France now imports more LNG from the south (Montoir, Fos) and gas also enters more often from Pirineos in the north, and since most of the maintenance work is located in the middle of the network, we view the south flows as beneficial to release the constraint on

EOD2 and S1 and are therefore beneficial to the system, given that gas will no longer have to flow through that part of the network facing the maintenance. In the same context, we would also like to point out the maintenance program indicator for the ATRT8 period (Appendix 2 paragraph 2.b of the deliberation N 2024-22 related to TSOs service quality), which clearly notes as a TSO obligation, the compliance with the maintenance program and probable impact predicted in October and February.

Given that 66% of the storage capacity in France will be impacted by the planned maintenance, we call on the NRA and operators to change the principle of publication. Increasing the threshold of the small maintenances - a mechanism managed by the TSOs - and providing transparency to the shippers in terms of their interruptible services, seems to be a good way of reducing the number of days to be published in the end. And in the event of congestion, it seems to us that the existing congestion management mechanism has proved its efficiency.

Lastly, during the ATRT7 period, our member companies have experienced high maintenance days by GRTgaz and Storengy at other network points, such as exit IP Oltingue and entry PITTM Fos. Specifically, we note 62 days of maintenance for IP Oltingue only for the second year in a row without transparency for the shippers. In addition, we also note 69 days PITTM Fos and 103 days for the injection and 133 for the withdrawal in Sediene Nord (Storengy).

We thus propose two solutions to address maintenance programs more broadly, as we witness numerous maintenance days at other French network points covering transport, storage, and LNG facilities. We recommend:

- Increase of the threshold of small works for all French network points as an immediate solution for the next two years, which could also be kept in the long term.
- Similarly to what the majority of European TSOs already apply, the introduction of an indicator relating to maintenance programs (Appendix 2 paragraph 2.b) as a long-term strategy for France: a maximum number of maintenance days for all network points to be respected. In case of exceedance, grant shippers a discounted tariff or even exemption from payment. By way of example:
 - o Suspend the payment of any Premia that is applicable to the relevant capacity term during the first xx gas days of maintenance restriction, and thus limiting the payment obligation to the Reserve Price only;
 - o Release the capacity holder from any payment obligation for the duration and scope of restriction beyond xx gas days.

We remain at your disposal to further detail our thinking in forthcoming Concertation Gaz meetings.

Contact

Mariana Liakopoulou

Markets and Policy Associate

m.liakopoulou@efet.org