

RWE Gasspeicher GmbH, Flamingoweg 1, 44139 Dortmund

Gasunie Transport Services

via e-mail to nop@gastransport.nl

**RWE Gasspeicher
Sales department**

Our Signature SV
Name Sabine Vahley
Phone 0231438 6187
Fax 0231438 38 6187
Mail sabine.vahley@rwe.com

Dortmund, 10/06/2015

Consultation Network Development Plan (NOP) 2015

Dear Sir or Madam,

RWE Gasspeicher GmbH (RGS) appreciates to have the possibility to take part in the consultation of the NOP 2015. RGS operates in total six storages for the German and Dutch market. Two of these storages, storage Epe NL (G-gas) and storage Kalle (H-gas), have a connection to the transmission grid of Gasunie Transport Services (GTS).

Due to the given short reaction time of this consultation we are focusing our answer on the crucial point of our findings:

Generally, RGS as Storage System Operator is pleased to see that the importance of storages for the whole gas system is recognized within the NOP 2015.

However, with the current grid pricing storages are not able to perform its seasonal and daily load and peak balancing functions because customers are not willing to book and use storage facilities if the entry and exit costs in the grid reduce the benefit out of a storage to zero. Our G-gas storage facility in Epe as example shows that the entry and exit costs for storage usage are higher than the market value of storage products based on the current summer-winter-spread of gas prices of about 1 to 2 €/MWh. Under these conditions an economic storage operation and usage will not be possible in the upcoming years.

RWE Gasspeicher GmbH

Flamingoweg 1
44139 Dortmund
T +49 231 438-2110
F +49 231 438-3719
I www.rwe.com

Geschäftsführung:
Andreas Frohwein
Michael Kohl

Sitz der Gesellschaft:
Dortmund
Eingetragen beim
Amtsgericht Dortmund
Handelsregister-Nr.
HR B 21652

Bankverbindung:
Commerzbank AG
Dortmund
BLZ 440 400 37
Kto.-Nr. 3520 129 00
BIC COBADEFF440
IBAN DE20 4404 0037
0352 0129 00

USt.-IdNr. DE 2634 99 139

In addition to that, users of other flexibility sources only have to pay entry and exit fees for the grid connection once and not twice as they have to do for the usage of a storage facility.

To fulfill the important role storages should have for the future peak supply and grid operation it is necessary that the prices for the entry and exit fees at the storage connection points will be reduced significantly.

— Furthermore, all storages within the Dutch market are in competition and so the difference of entry and exit fees for the storage connection points has to be minimized. In today's virtual market system a customer can use the storages without limitation all over the gas market. A distance-related approach as it is used today to define the entry and exit fees to the storage connection points causes competitive distortions.

There are no confidential points in this comment, therefore RGS agrees with its publication.

We would be pleased to explain our view in more detailed discussions.

Kind regards,
RWE Gasspeicher GmbH



Michael Kohl



i. V. Jörg Albers