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Tēma: Eesti Energia Comments on the Draft Amendments to the Inčukalns UGS Regulations

Dear Public Utilities Commission of Latvia,

Thank you for the opportunity to participate in the public consultation regarding the proposed amendments to the Regulations on the Use of the Inčukalns Underground Gas Storage Facility.

Please find below Eesti Energia's comments on the proposed version of the Regulations (none of them are confidential and you can publish them if needed):

- There is no need to set a fixed date by which storage product auctions must be completed. If, after the conclusion of the interruptible capacity product auctions, there is still available storage capacity, the standard one-year storage product should become available for booking. This could be offered either through additional auctions or via the Common Zone Platform on a first-come, first-served (FCFS) basis. Currently storage users cannot book any of the storage products after the end of interruptible capacity product auctions.
- The Rules should clearly specify the earliest date on which newly booked storage products may be utilized. As far as we understand, storage capacity booked through an auction can be used for injection starting from the gas day following the auction in which the product was allocated. This principle should be explicitly reflected in the Rules.
- The storage operator should have both the right and the operational readiness to commence the injection season before 1 May and the withdrawal season before 15 October when market conditions require it. For example, if maintenance works are scheduled at the Klaipēda LNG Terminal or the Inkoo LNG Terminal during the first half of October, the Inčukalns storage operator should be prepared to switch to withdrawal mode from the first day of such maintenance. During 13–14 October 2025, there was a tangible risk of physical gas shortages due to maintenance works at the Klaipēda LNG Terminal while Inčukalns remained in injection mode. As a result, gas demand across the Finland-Baltic market area had to be met through the Inkoo LNG Terminal, GIPL, and very limited counterflow capacity from Inčukalns. Greater operational flexibility would significantly enhance regional security of supply.
- There should also be greater transparency regarding the allocation and use of solidarity products. At present, the list of companies holding or utilizing these products is not publicly available, which raises concerns among market participants regarding equal treatment and whether these products may provide disproportionate advantages to certain parties. Increased transparency would help strengthen confidence in the fairness and integrity of the framework.
- The volume of five-year storage products offered should not be increased during the validity period of five-year products that have already been allocated. The scarcity of such products was a key factor considered by market participants when determining their bids in the 2025 and 2026 auctions. Increasing the available volume retrospectively would materially reduce the value of the capacity already acquired, both from a commercial perspective and on the secondary market.
- For several years, market participants have proposed limiting the annual auction volume of five-year products to approximately 25–30% of the total volume designated for long-term products. The objective of this proposal was to preserve a stable and predictable regulatory framework. Unfortunately, these suggestions have not been taken into consideration. Maintaining the originally established scarcity conditions is important for preserving market confidence and regulatory predictability.
- Finally, we would appreciate future public consultations being conducted in English as well. We fully understand and respect the legal requirement for the regulator to conduct consultations in Latvian. However, given that a significant share of storage users are non-Latvian companies and that the Inčukalns storage facility plays a critical role in the gas markets of Finland, Estonia, Latvia, and Lithuania, it would be highly beneficial to facilitate dialogue in English. We would also appreciate high-quality English translations of draft

amendments. The current English version contains several untranslated terms and, in some instances, translations that do not accurately convey the intended meaning, making it difficult for international stakeholders to provide informed feedback.

Thank you for considering our comments.

Kind regards,
Eesti Energia AS

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