

Sabiedrisko pakalpojumu regulēšanas komisija
Ūnijas str. 45, Rīga,
LV-1039, Latvia

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To 27.04.2018 Nr. 01-11/208¹⁰

Phone: +371 67097200
E-mail: sprk@sprk.gov.lv

RESPOND TO THE PUBLIC CONSULTATION ON THE NEW RULES FOR INČUKALNS UNDERGROUND GAS STORAGE FACILITY

With this letter UAB LIETUVOS DUJU TIEKIMAS expresses its opinion on draft usage rules for Inčukalns underground gas storage (further – IUGS).

Draft rules No.	Draft description	Our proposal	Comments
23.	At the end of the withdrawal season, the grouped capacity product balance should not exceed 10% of the total reserved capacity of this product.	At the end of the withdrawal season, the grouped capacity product balance should not exceed 10% of the total reserved capacity of this product. This restriction shall not be applicable for storage capacities used for mandatory natural gas storage based on legal acts/requirements of the country where storage user operates.	To supplement existing description with the point that suppliers of other countries (in the same way as in Latvia for energy crisis and in case of endangerment to the state) might have an obligation to keep certain stocks based on legal acts of the country they perform the activity.
60.	If the system operator detects physical overload in the system during the storage or withdrawal of natural gas from the storage facility before 15:00 of the previous day, the system operator shall, in the context of overload management, divide injection or withdrawal capacity between system users in proportion to	If the system operator detects physical overload in the system during the storage or withdrawal of natural gas from the storage facility before 15:00 of the previous day, the system operator shall, in the context of overload management, divide injection or withdrawal capacity between system users in	Smaller storage users are discriminated, withdrawal and /or injection capacity shall be allocated in proportion to nominated volume on a particular day.

	their reserved storage capacity by first providing the system user who ensures supply of natural gas to the protected consumers only in the amount of provided natural gas.	proportion to their nominated volumes on the particular day by first providing the system user who ensures supply of natural gas to the protected consumers only in the amount of provided natural gas.	
Additional		Percentage restriction stated in paragraphs 23 and 27 shall be applicable only in cases when total volume of all IUGS users at the end of the season is greater than required.	In order to avoid any doubt, clarification when par. 23 and 27 shall be applicable.

General Director

Mantas Mikalajūnas

Original will not be sent.

D. Lysko, tel. +370 (5) 278 2815, e-mail: darek.lysko@ldtiekimas.lt