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Sent: Thursday, January 26, 2023 1:57 PM
To: SPRK <sprk@sprk.gov.lv>
Cc: ENK Gaas/Energia <gaas@energia.ee>
Subject: Public consultation on amendments to the Inčukalns UGS rules

Good evening,

Thank you for the opportunity to comment on the proposed changes. We would like to pose some of the questions and comments on this topic.

In general, we understand your concerns and therefore potential need for the injection curve implementation, but we would like to disagree on that.

- (i) Implementation of the injection curve will highly decrease flexibility of the local market and benefit only those taking part in the annual capacity allocation of the terminal slots in either Inkoo or Klaipeda. Those looking at the spot allocation or trading with 3rd parties can not always forecast their injection that well.
- (ii) With strong demand destruction happening in the market some might overestimate/underestimate potential need for the injection in particular month.
- (iii) Implementation of the same injection curve on both one year and two-year capacity products also seems rather unnecessary, flexibility should be given with those as the only ones sure about the terminal slots in such a long period are the market participants who have got slots in Klaipeda as part of the long term capacity allocation.

Nevertheless, in the light of the proposed amendments we have some comments and questions:

1. It is unclear whether injection curve is a baseload, or whether monthly injection could be adjusted to particular part/ days of the month.
2. If volumes were not injected during the provided injection period, is market participant still able to inject volumes using interruptible capacity the next month? Is it possible to inject gas the month before indicated injection curve using interruptible capacity?
3. What is the proposed curtailment for the interruptible capacity?
4. If user does not use all of the daily volumes available to him by the injection curve of the capacity products available to him, will those become available as interruptible capacity to other users?
5. If user gets interruptible capacity allocated to him prior the indicated injection month, will his injection curve volumes automatically decrease and become available to other users as interruptible capacity?
6. If we correctly understand, nominations exceeding injection curve volumes would be automatically declined. We believe it is unnecessary and those should be accepted up to the volume of the injection capacity determined by the injection curve if no interruptible capacity is available and in full volume if there is interruptible capacity available.

Best regards,

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Analyst/ Trader

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