



European Commission  
DG Energy - ENER.B.4 'Internal Energy Market: Security of Supply'  
Rue De Mot 24-26  
B-1049 Bruxelles  
Belgium  
Brussels, September 30th, 2015

Dear Sir, Dear Madam,

Iberdrola welcomes the Consultation on an EU strategy for liquefied natural gas and gas storage. Iberdrola is a company operating in the field of electricity, gas and renewable energy which provides services within this sector under its own name and through all the companies included in its Group. Their main businesses are located in Continental Europe, United Kingdom, USA, Mexico and Brazil and comprise 45.1GW of installed capacity, of which 14.7GW in renewable sources, 214.6TWh of distributed energy and 32.5 million customers (electricity and gas). Besides, Iberdrola buys and sells energy in the main European markets (Spain, UK, Portugal, France, Germany and Italy). Iberdrola operates 13.5GW CCGT across the World (8GW in the EU) and is one of the leading players of LNG in the EU.

In the context of this Consultation, Iberdrola wants to highlight the following issues on LNG and storage regulation:

- **Potential entry barriers for LNG:**

- We share the concerns about the unattended effects of potential regulatory entry barriers in some regions. However, in the experience of Iberdrola, we find NO entry barrier of ANY kind in the EU LNG markets in which IBERDROLA are very active (Spain and UK).
- Though the regulatory convergence is desirable in the long term in this field as any other to build the Energy Union, the experience of Iberdrola is that the current performance of the regional markets in Spain and UK provide a good level playing field with no entry barriers.

- **Issues on infrastructures**

- As addressed in the response to the Consultation on the Revision of Regulation (EU) No 994/2010 concerning measures to safeguard security of gas supply Iberdrola thinks that a “regional approach” is also to be recommended to LNG infrastructures regarding, transmission, storage and regasification as well.
- New projects, based on such “regional approach” should base on a common EU cost-benefit analysis and to a market test, insuring current capacity is maximised and avoid idle or insufficiently supported investment across the EU geography.

We remain open to any further explanation or clarification.

Yours sincerely,

Miguel F Calleja  
Head of Global Coordination and Regulatory Positioning