



GSE Response to 3rd EU Energy Package

Madrid Forum XIII
16/17 October 2007



- GSE has no objection to the proposal to include the scope of the GGPSSO in amended regulation 2005/1775, as it respects the scope of the GGPSSO. GSE would expect that any initiatives for changes beyond this scope through comitology, take place in full consultation of all stakeholders.
- The proposal to enhance the powers of NRA's with respect to storage represents a substantial adjustment to the regulatory framework for storage facilities. GSE is of the opinion that these changes to the regulatory framework could be detrimental to the investment climate for storage.



- GSE continues to be of the opinion that compliance with the requirements of the GGPSSO ensures equal treatment of storage users. The additional requirement of legal unbundling for storage system operators that are part of vertically integrated undertakings seems unnecessary from this point of view. Inclusion of the GGPSSO in regulation 2005/1775 further strengthens this view.