

*Comments of SPP Storage, s.r.o. as the operator of the gas storage facility in Dolní Bojanovice on the methodology for the development of tariff items for the use of the transmission system in the Czech Republic as required by Commission Regulation (EU) 2017/460 of 16 March 2017 ("Consultation Document").*

Gentlemen,

We have read the consultation document on which we have comments, from the perspective of a gas storage company that intends to offer a cross-border gas storage service in the near future, as defined in Section 2(2)(b)(33) of the Energy Act.

On pages 26-27 of the consultation document, Table 17 lists a separate item Dolní Bojanovice gas storage facility (CZ-SK); the designation (CZ-SK) evokes cross-border use of the storage facility, although Table 17 refers to ENTRY/EXIT within the domestic market. Here, we consider that it would be appropriate to subset the Dolní Bojanovice gas storage facility under Gas Storage Facilities (CZ). Cf. page 18 of the consultation document.

Furthermore, in our opinion, it would be appropriate to specify in more detail the methodology for calculating the price for the cross-border gas storage service, which, according to the consultation document, is derived from the Lanžhot IP, but the calculation mechanism is not entirely clear from the document.