

**Consultations concerning draft
of the LNG Terminal Code (LNGTC)**



EFET general comments – 10 May 2016

EFET¹ welcomes the opportunity to submit a general response to the above consultation and to contribute to the implementation of an appropriate access code of the Swinoujscie LNG Terminal.

Due to the fact that the consultation period of the LNGTC is very short, it was not possible for all of our members to properly consider the issues raised. Therefore, the high level comments should not be regarded as final until we are able to undertake a full review, yet we remain available for further discussions.

We highly appreciate the work that has been done in order to prepare the framework for terminal operations but we would also like to point out some areas of concern on which we would appreciate receiving additional clarifications:

- The outlines of the gas quality specification
- The process of establishing the annual and Monthly Schedule of Arrivals
- The provision of Terminal Capacity allocation and Process Storage Program establishment
- The implementation of the Secondary Capacity Market as only Congestion Management mechanism available
- The generally more favorable treatment reserved to long-term users

In addition to the specific points above, we take this opportunity to reiterate that the main obstacles to import in Poland are of fundamental nature. In particular:

- Diversification requirements
- Storage requirements
- Existence of regulated gas tariff

¹ The European Federation of Energy Traders (EFET) promotes and facilitates European energy trading in open, transparent, sustainable and liquid wholesale markets, unhindered by national borders or other undue obstacles. We currently represent more than 100 energy trading companies, active in over 27 European countries. For more information, visit our website at www.efet.org.

To ensure our feedback is well received we therefore remain available to discuss and provide any necessary clarification.

We thank you for your kind attention.