

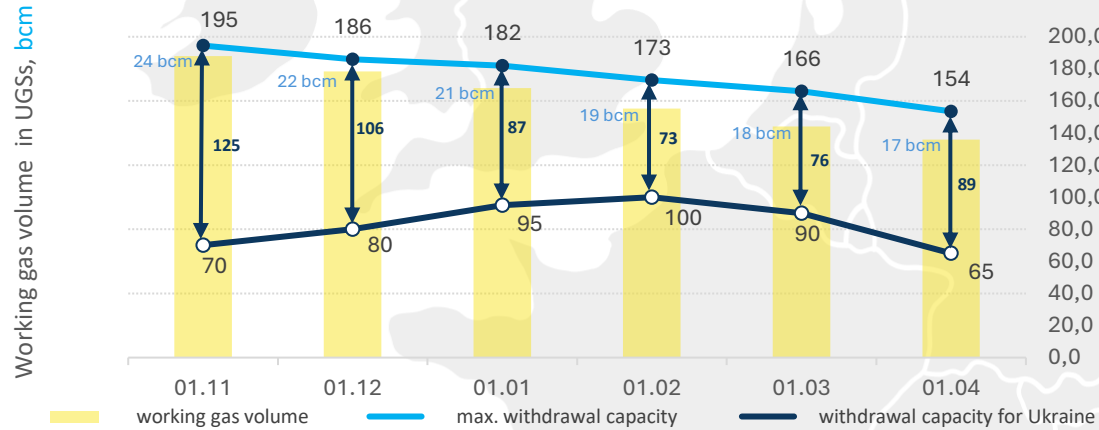
UA UGS SoS and Commerce



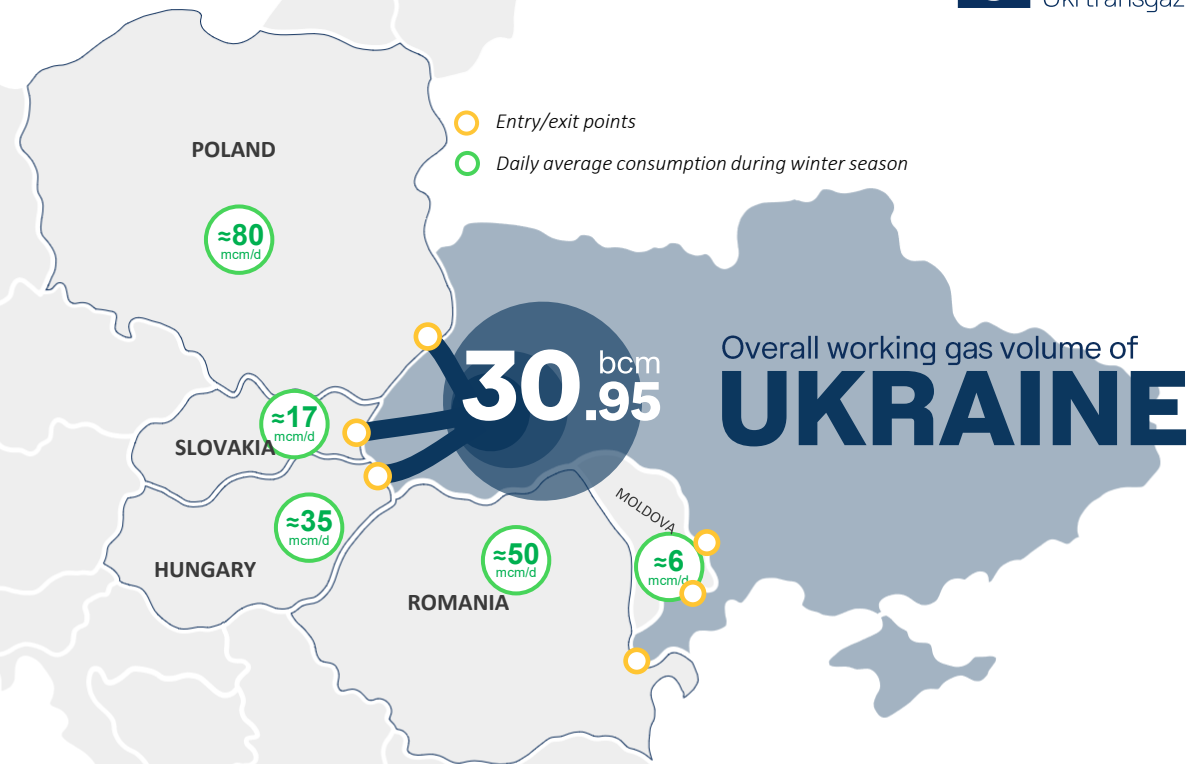
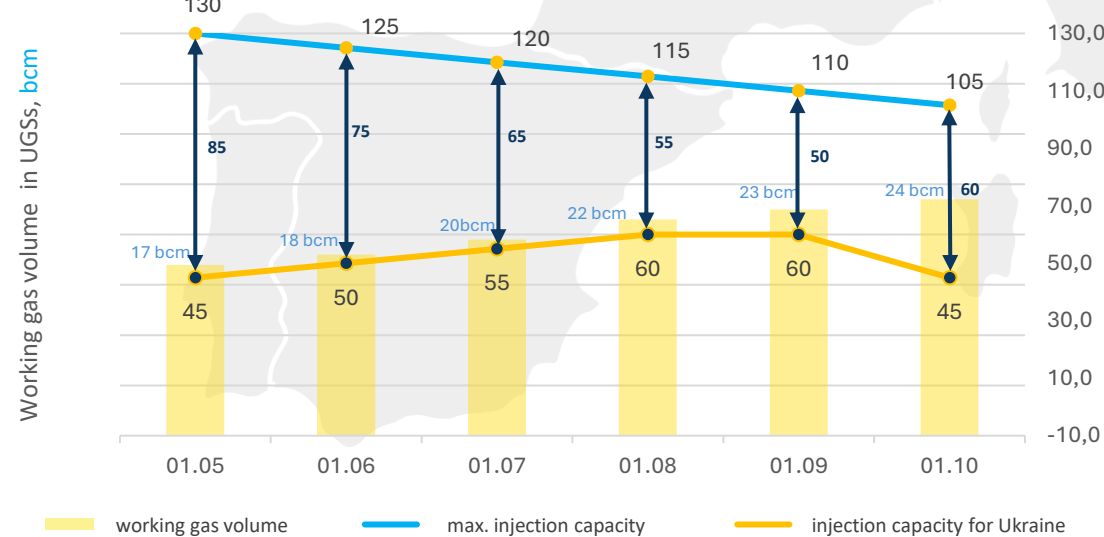
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UA storages availability on EU energy map

Dependence of maximum gas **withdrawal** on the volume of working gas in the UGSs



Dependence of maximum gas **injection** on the volume of working gas in the UGSs



UGS

mcm/d
154-195 withdrawal*

mcm/d
105-130 injection**

* 65-100mcm/d for Ukraine

** 45-60mcm/d for Ukraine

Gas Storage Regulation (EU) 2022/1032 of 29 June 2022

amending Regulations (EU) 2017/1938 and (EC) No 715/2009 with regard to gas storage



Commercial impact on EU gas market

The Storage Regulation itself was seen as a contributor towards creating the negative spread as Member States scrambled to meet their intermediary targets and in doing so created an upward pressure on prices.*



Regulatory impact on UA storages

The current EU gas Storage Regulation does not include provisions allowing Member States to use UA storages to meet the Regulation's storage targets.

Gas security is not only energy companies and storage operators' business:
This is an essential state “insurance” function that needs to be recognized at the EU level

Urgent need to move from crisis response to structural gas security

Legal regulation of **strategic natural gas reserves** is fragmented at national level, underscoring the need for a **unified EU gas security framework**. Only

11 out of 27

EU Member States maintain strategic reserves of natural gas.



*Source:
Oxfordenergy

The Need for Clarity on Ukraine



RePowerEU Implementation

An urgent EC clarification

Clear treatment of UA CWR gas re-exported to the EU is essential to enable compliant use of UA storages.

Explicit presumption of compliance for re-exported gas is needed.

Any additional documentation requirements beyond EU practice will deter importers and lead to underutilisation of UA storages.



Methane Regulation

Immediate priority:

Clarify that EU MRV obligations do not apply to gas temporarily stored in UA UGSs and re-exported to the EU.

Strategic priority:

Clarify that gas storage or transit via UA infrastructure does not change the methane intensity of gas placed on the EU market.