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# Report on Energy Storage

## Commentary

Berlin, 18/03/20

### **Initiative Erdgasspeicher e.V.**

INES is an association of German gas storage system operator based in Berlin. INES represents with 13 Members approximately 90 % of the German gas storage capacities. The INES-Members therefore operate nearly 25 % of the gas storage capacities within the European Union.

## Introduction

INES has noticed and highly appreciates the recently drafted report on energy storage in Europe. The report is an important and necessary step forward to make the energy transition in Europe successful. For energy supplies - increasingly based on renewable energies - storage systems will be required in large scale.

INES likes to remark a few further points to be considered. They reflect the necessary usage of gas storage systems for the energy transition, which INES believes the report does not reflect in all aspects as needed.

**The commentary is related to the draft report dated 17<sup>th</sup> February 2020.**

## Completing the recommendations

INES proposes to add in the paragraph “Power to Gas” after number 15 the following:

- Is convinced that the existing over 600 TWh gas storage capacities in the EU will contribute most to the required large-scale energy storage for renewable energy supplies. They can store renewable energies in gaseous form after the electricity has been transformed via electrolyzers, thereby ensuring security of supply in a renewable energy world.
- Acknowledges that also the gas storage system is usually charged twice in regard to transmission fees, energy taxes or additional fees or levies and calls the commission to prohibit all double payments related to gas storage systems.
- Points out that different approaches to taxes, additional levies and fees in the EU member states distort the cross-border competition of gas storage systems and therefore a more harmonised approach is needed.
- Calls on the Commission to establish at EU and for national levels concepts for communications between electricity and gas network operators in order to better manage the balancing of supply and demand of energy in the cross sectoral grid operations. Coordination between the electricity and gas sectors can be further improved by (i) strengthening the network planning activities and (ii) improving the interdependency of the electricity and gas sectors and (iii) considering all existing energy storage facilities to avoid stranded investments and to ensure a cost-efficient energy system.

## Justification of the proposals

As opposed to electricity storage systems gas storage systems can store renewable energies (renewable gases) over a period of weeks and months. Due to the fact that energy demand in a renewable energy system will still be very high during the winter (for heating

purposes) and significant parts of the renewable energy production will occur in the summer (solar based production) seasonal storage is very much required. In addition, sector coupling enables the usage of renewable energies in every sector. The European Commission should foster and ensure that the existing infrastructure, especially gas storage systems, will be maintained for their future purposes and that they are efficiently integrated into developments of the whole renewable energy infrastructure.

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