

Energy Traders Europe response to CRE on the next tariff for the use of regulated LNG terminals in France

Brussels, 30 September 2024

Energy Traders Europe appreciates the opportunity to submit our comments to CRE on the consulted next tariff for the use of the Elengy terminals. As we have previously done in part of our past response to the ATRT7 update¹, we focus our remarks on the proposed backhaul service from the grid to the tank of the terminal, as a complement to forward nominations.

While appreciating the existing possibility for traders to make all uses of bio-LNG terminal services in France, as the latter are listed in our recent presentation to the EU Commission during the workshop of the Prime Movers Group on Guarantees of Origin², we express our support for the discussed backhaul service. However, our support is conditioned on the following asks:

1. That the service does not prejudice the rights of firm capacity holders,
2. That the tariffication of the new service reflects a fair contribution to the LNG economic value chain.

In line with established practice in other terminals in Europe, such as Zeebrugge and Gate, we view the PITTM backhaul service as a means of offering existing unused flexibility to the market, without shifting away flexibility from existing LNG shippers to small-scale users.

¹ [Consultation response to CRE on the modification of ATRT7, ATS2 and ATTM6 tariff methodologies](#)

² [Opening LNG infrastructure to renewable and low-carbon gases: The trader perspective on bioLNG traceability via the Union database](#) (pg. 18)

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We understand that, provided Elengy gets in due course certified by ISCC as liquefier, the possibility of backhauling nomination as an optional service will provide traders with more leeway in our contractual arrangements, notably in the way that we conclude deals in tank, instead of exclusively at the flange, or before the flange.

Moreover, if backhaul nomination is ultimately enabled by CRE, the LSO will be able to propose to us the physical liquefaction service, on top of the equivalence liquefaction one, that is limited in volume but comes with smaller carbon content.

Ultimately, once backhaul nomination is in place, traders will be able to store LNG in the tank, which is not currently the case with equivalence liquefaction, whereby, for a gaseous PoS, we get a PoS at the flange of the terminal, on condition of ownership of a molecule in the loading slot and a loading slot for charging of a tanker truck or bunker vessel. This opens the opportunity for further onward sale of our bio-LNG in stock to other parties.

We remain at the disposal of both CRE and Elengy to discuss details around the capacity of physical liquefaction to be allowed, considering the lower carbon intensity of France compared to other countries, as well as the forthcoming revision of annexes V and VI of the Renewable Energy Directive³. We are also prepared to discuss the prospective proposals on commercial offers for the terminals, to be consulted by the CRE separately, once and if the service is allowed.

Finally, since the service should have its own transport tariffs, as noted by CRE in the consultation, the Regulator should ensure that the eventual introduction of this tariff does not change the tariff system approved last year, and remaining in force until 2027, to ensure tariff stability.

³ [Renewable energy – revising biofuel, bioliquid and biomass fuel production pathway values and modifying methodology](#)

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Contact

Mariana Liakopoulou
Markets and Policy Associate
m.liakopoulou@energytraderseurope.org