



To:
RAE
via
gasconsultation@rae.gr

Athens, 15 April 2022

No. RAD/ S.C.58321/474

Subject: Public Consultation of RAE on the Cost Benefit Analysis for an FSU
in Revithoussa of DESFA

Re: Announcement of RAE as of 08.04.2022

Dear Sirs,

Taking into account the unforeseen recent developments due to the Russia-Ukraine war, we believe that strengthening of gas infrastructure is of utmost necessity, improving gas security supply not only in Greece but also in the wider Southeastern Europe region. In this direction, the addition of a floating storage unit (FSU) in the LNG Terminal of Revithoussa, combined with other planned gas system infrastructure projects, will allow for further diversification of gas supply sources, will enhance system flexibility and security in Greece and the wider Balkans region. All these actions fully comply with the REPowerEU plan¹ and the new energy strategy of the European Union, currently in revision process with the cooperation of all Member States.

Focusing on the implementation of upgrading the storage capacity with the addition of FSU and the cost-benefit analysis of the Operator (DESFA), we consider that the following should be taken into account:

- Any increase in LNG storage capacity should be followed by a relevant increase in storage period, considering the fact that the consumption of a full LNG cargo (1 million MWh) during the storage period that is currently provided to users (13 days for the period December – February and 18 days for the period March- November), is very difficult to be achieved.
- From our past experience, in periods of high demand of LNG -and not even in such critical conditions as in nowadays- there is a shortage in

¹ https://ec.europa.eu/commission/presscorner/detail/en/ip_22_1511



regasification capacity. For this reason, we believe that it should be clarified: a) how regasification capacity will be increased, also by providing the relevant implementation plan, and b) the criteria for 10% increase, making it sufficient especially during peak demand periods.

We remain at your disposal for any further clarifications.

Sincerely,

Gkatzou Evangelia
Director of Regulatory Affairs