



Margrethe VESTAGER
Executive Vice-President

Kadri SIMSON
Commissioner

16 September 2021

Dear Madame Vice-President,
Dear Madame Commissioner,

In July-September 2021, European spot gas prices have surged to unprecedented levels - now reaching over USD 700 per thousand cubic metres¹, an absolute all-time record. To compare, at the beginning of 2021 the European spot gas prices topped USD 300 per thousand cubic metres. Natural gas traders and business media have been citing Gazprom's actions as some of the key reasons for such price surge². These actions have included:

- Gazprom's refusal to book gas transportation capacities through existing pipeline systems (Yamal-Europe, Ukrainian gas transport networks);
- Shut-ins of Gazprom's natural gas production at Yamal upstream gas fields, some of which were explained by a fire at the Novy Urengoy condensate treatment plant, but it is not clear whether all the shut-ins were justified by that accident, and whether deliberate market manipulation was involved;
- Gazprom's refusal to answer calls from European natural gas consumers to guarantee additional volumes of gas supply during the Summer of 2021 to help resolve the problem of insufficient underground gas storage stocks ahead of the winter season, despite available information that Gazprom has sufficient additional gas production capacity in place to provide such extra supplies.

All these factors allow to suspect that the record natural gas price surge in Europe in the recent weeks may be a direct result of Gazprom's deliberate market manipulation and actions aimed at intentional withholding available gas production capacities from the market in order to push gas prices up.

This raises suspicion of Gazprom's deliberate effort to pressure Europe to agree with immediate launch of the Nord Stream 2 pipeline despite its non-compliance with the EU energy market rules³. According to Bloomberg, Gazprom plans to start shipping gas to Germany

¹ <https://www.gazeta.ru/economics/2021/09/09/13969046.shtml?updated>

² <https://www.rferl.org/a/gazprom-gas-reserves-prices/31431686.html>
<https://www.dw.com/en/can-europe-escape-gazproms-energy-stranglehold/a-58222974>
<https://www.upstreamonline.com/politics/opinion-gazprom-fuels-gas-supply-game-in-europe/2-1-1056464>

³ <https://www.kommersant.ru/doc/4977949>

through the first leg of the Nord Stream 2 pipeline on 1 October⁴. However, Gazprom did not implement the EU rules of unbundling so far. German court ruling in August has further confirmed that the pipeline is not exempt from the European Union rules.

We call on the European Commission to urgently open an investigation into possible deliberate market manipulation by Gazprom and potential violation of EU competition rules, which had resulted in sufficiently higher energy bills for the European consumers.

Sincerely,

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⁴<https://www.bloomberg.com/news/articles/2021-09-08/gazprom-plans-to-start-nord-stream-2-gas-pipeline-next-month>

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