



## Consultation on the GSNE-VO 2013 – 2<sup>nd</sup> Amendment 2026

ENGIE answer – 04/05/2026

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ENGIE welcomes the publication of the Austrian tariff consultation for 2027 and appreciates the opportunity to comment on the proposed gas network usage charges as contemplated by E-Control.

ENGIE acknowledges that, following the exorbitant, unjustified and unprecedented increases observed in previous years, tariffs for 2027 show limited increases or even slight decrease at certain entry and exit points compared to the 2026 tariffs. We note, however, that this still does not attempt to address the fundamental financial and compliance/regulatory issues previously raised and highlighted again below, which therefore remain unaddressed through appropriate measures.

### **1. Unjustifiable, excessive and disproportionate high tariffs considering the economic utility of the capacities**

Austrian transmission tariffs remain unjustifiably, excessively and disproportionately high, even when assessed against the current economic value and effective utility of the concerned transport capacities.

We understand that the cessation of gas deliveries by Gazprom has led to a structural loss of value of significant parts of the Austrian transmission capacity, notably at entry and exit points such as GCA Baumgarten and GCA Oberkappel. These capacities were indeed historically developed to accommodate Gazprom flows.

This loss of value results from unforeseeable geopolitical and regulatory developments entirely beyond the control of private shippers and GCA's clients. It is therefore neither fair nor justified to impose and maintain tariff levels that implicitly assume a level of network usage which no longer exists, nor to require remaining private shippers to finance, through



regulated tariffs, infrastructure assets, thereby imposing tariff increases that are highly burdensome for Engie.

As with 2025, ENGIE therefore requests that a significant downward adjustment of tariffs be implemented to reflect the very substantially diminished utility of these capacities. This would moreover mitigate the risk of breach of the EU tariff network code n°2017/460 (NC TAR) we pointed out last year.

## **2. Lack of visibility on future tariffs and treatment of the Gazprom-related shortfall**

In parallel, ENGIE is concerned by the absence of visibility on future tariff trajectories, in particular beyond 2027. Until last year, indicative tariff projections for subsequent years were provided by GCA, allowing market participants to assess long-term commitments. The absence of any indication for 2028 and beyond results in a complete lack of predictability and further exacerbating the lack of transparency for private shippers.

This situation is further exacerbated by the uncertainty surrounding the treatment of the revenue shortfall linked to unpaid Gazprom-related capacities for 2025. Based on discussions held last year with E-Control and GCA, ENGIE understood that this missing revenue would be recovered in the following years, through subsequent tariff adjustments.

Against this background, ENGIE seeks explicit clarification as to whether E-Control intends to definitely forgo the recovery of this shortfall, or whether private shippers should expect it to be recouped through additional tariff increases in the coming years.

## **3. Conclusion**

The broad maintenance of tariff levels for 2027 does unfortunately not address the concerns identified in the current context and initially raised in 2025. In light of the recent most burdensome and drastic tariff increases, ENGIE urges E-Control (i) to implement a credible regulatory path leading to a significant reduction of tariffs for 2027 and subsequent years, and (ii) to restore meaningful transparency on future tariff developments, including the treatment of the revenue shortfall arising from unpaid Gazprom-related capacities in 2025.

ENGIE reserves all its rights, whether at law or under any relevant contractual arrangements, including the right to challenge any final decision adopted by E-Control if necessary.

We remain available for any clarification or discussion.



Yours sincerely,

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