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Your ref./date	Our ref.	Liabile/phone	in Malacky
	L-II/507-2026-ROaM	M. Beňa/034-772 5939 ext.214	on 4 May 2026
	File Nr.: 507-2026-OaM		

Subject: **R SNE G 01/26 / Consultation on Gas-Systemnutzungsentgelte-Verordnung 2013 (GSNE-VO 2013) – 2nd Amendment 2026**

Dear Sir or Madam,

We refer to the draft amendment of the Gas-Systemnutzungsentgelte-Verordnung 2013 / 2nd Amendment 2026 ("GSNE-VO"), published by the regulatory authority E-Control in April 2026, and welcome the opportunity to submit our comments in the consultation process.

As was the case when setting the transmission tariffs for 2026, with regard to the new transmission tariffs for 2027, we would like to point out that the proposed continued increase in tariffs:

- undermines the market value of both newly offered and already contracted storage products,
- creates an unpredictable and unstable business environment,
- jeopardizes the fulfilment of the fundamental function of underground gas storage, namely ensuring security of gas supply, particularly in the current situation of insufficient market incentives for gas injection into storage facilities.

POZAGAS a.s. therefore does not agree with the proposed increase in tariffs and suggests that the regulatory authority E-Control reassess the pricing regulation methodology applied in determining the transmission tariffs.

Another equally significant issue with the proposed transmission tariffs for 2027 may be the unequal treatment of POZAGAS a.s. compared to competing storage operators in Austria. According to the proposed tariffs for 2027, the annual capacity tariff for POZAGAS a.s. is to be set at the level of EUR 1.94/kWh/h, while the commodity tariff is to reach EUR 0.2586/MWh. Based on the tariff setting in 2025 and 2026, it can be expected that in 2027 our direct competitors in Austria - storage operators connected to the Austrian distribution network - will again be fully exempt from the

commodity component of the tariff, which will further deepen the competitive disadvantage of POZAGAS a.s.

In our view, there is no objective justification for such differential treatment. This approach is contrary to the principle of non-discrimination and may be perceived as a measure inconsistent with European Union law, including competition rules.

In order to ensure fair and non-discriminatory conditions in the Austrian gas storage market, we call on the regulatory authority E-Control to adjust the proposed tariff model so that all storage operators directly connected to the Austrian gas network are subject to the same tariff regime.

Yours faithfully,

Martin Beňa
sales and marketing director