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Subject: Reply to Consultation on Gas System Charges Ordinance 2013 – 2nd amendment 2026 (R SNE G 01/26)

Executive summary

Shell welcomes the opportunity to comment on the current E-Control consultation. We wish to express concerns regarding the proposal's impact on gas affordability for final customers and on the long-term competitiveness of Austrian gas transmission routes.

In our view, greater transparency on the drivers of the proposed tariff changes, a more gradual tariff adjustment path, and the non-discriminatory application of flexibility mechanisms such as reshuffling would improve the predictability of transport costs, preserve Austria's attractiveness as a transit corridor, and contribute to national security-of-supply objectives.

Dear Sir or Madam,

Shell welcomes the opportunity to comment on the current E-Control consultation on gas transmission tariffs applicable as of 2026. We appreciate the continued engagement of the Authority with stakeholders and recognise the challenges faced by the Austrian transmission system in the current market environment.

Based on the proposed methodology and tariff levels, we would however like to express a number of concerns related to affordability, transparency and the long-term competitiveness of Austrian gas transmission routes.

First, the proposed tariff increases for 2027 risk exerting upward pressure on Austrian gas prices. The recent increase in €/MWh transport charges represents a significantly higher share of the delivered gas value and disproportionately penalises throughput use of the transmission system.

Second, further material tariff increases risk triggering a volume-elastic response in transit flows. Reduced utilisation could in turn lead to higher unit costs, potentially resulting in a self-reinforcing cycle of declining volumes and rising tariffs.

Third, we note insufficient transparency regarding the main drivers of the proposed tariff changes, including the assumed impact of gas price developments on operational expenditure. This creates uncertainty for market participants and undermines the predictability of the Austrian route compared with alternative corridors. In particular, the tariff review proposal for 2027 introduces a material increase in the commodity charge, which appears difficult to justify in light of the materially lower gas price levels and volatility observed compared with recent years and with 2022 crisis peak. Lower volatility reduces balancing and operational costs and risks for transmission system operators, weakening the case tariff increase proposal.

Finally, while we acknowledge the need to ensure full cost recovery for TSOs, we would encourage the Authority to consider the following:

- providing greater transparency on the cost drivers of the tariff methodology and reassessing the proposed increase in the commodity charge;
- reconsidering the pace and scope of tariff increases. A more gradual adjustment over time would help preserve tariff stability and regulatory predictability while still safeguarding revenue adequacy;
- extending the reshuffling mechanism to capacity booked on other networks, rather than limiting its application to the same network. While the reshuffling mechanism has enhanced contractual flexibility and mitigated exposure to tariff volatility, its current network-specific application limits its benefits and may create discriminatory effects in favour of network users able to access reshuffling at Austrian interconnection points with increasing capacity demand.

We remain at the disposal of the Authority should you require any further information or clarification on the points raised above.

Yours faithfully,

Simone Antonelli - Regulatory Affairs Team Lead - Northwest Europe

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