

Via email

Date: 14 November 2025

**RE: Gas-Systemnutzungsentgelte-Verordnung 2013 (GSNE-VO 2013) – Novelle 2026**

Dear E-Control Colleagues,

SEFE Marketing & Trading Limited (“SM&T”) is a wholly owned subsidiary of SEFE Securing Energy for Europe GmbH (“SEFE”), responsible for the optimisation of SEFE’s energy commodity assets through SM&T’s marketing and trading network. SM&T is active as a trader and marketer of gas within the UK and Europe.

SM&T thank E-Control for taking the views of the market participants during the consultation under consideration in particular with regard to the proposed increase of the capacity utilisation tariff.

The proposed 61% increase in the capacity utilisation tariff from 0.91 EUR/kWh/h per annum to the proposed 1.47 EUR/kWh/h per annum is substantial; this particularly raises concerns regarding the predictability and stability of the regulatory framework. Such a significant adjustment within a single regulatory period places storage users at a disadvantage, as the tariff applies to booked injection capacities that cannot be modified once confirmed.

Under the current framework, storage customers may not adjust or return booked injection capacities when a substantial tariff increase occurs. Thus creating a situation where users face unavoidable additional costs, without any operational or contractual option to respond. In contrast, several other EU markets — for example, Germany — have mechanisms in place that allow shippers to return capacity if tariff increases exceed a defined threshold, such as the rate of inflation. This approach promotes fairness and transparency, helps maintain confidence in the market, and still enables system operators to recover costs.

SM&T therefore propose that consideration be given to introducing a limited flexibility mechanism that would allow market participants to return injection capacities in the event of a significant tariff increase within a regulatory period. Such a measure would help mitigate undue impacts on shippers, support consistent treatment across market participants, and further align Austria’s regulatory framework with well-established practices in other European markets.

SM&T fully recognise the importance of cost recovery and are aware the specific challenges faced by the Austrian gas system. SM&T’s intention is to ensure that tariff changes of such magnitude are accompanied by

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an appropriate mechanism to protect market participants from sudden and disproportionate exposure. In this way, the approach would balance the legitimate needs of system operators with the stability and confidence of users.

SM&T appreciate the open consultation process and remain available to provide further input or clarification if needed.

Kind regards,

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