



To  
**E-Control**

Rudolfplatz 13 a  
1010 Wien, Austria

Via e-mail to: [recht-post@e-control.at](mailto:recht-post@e-control.at)



Milan, 9 May 2025

**RE: Stellungnahme Gas-Systemnutzungsentgelte-Verordnung 2013 (GSNE-VO 2013) – 2. Novelle 2025**

To the attention of Regulierungskommission der E-Control

Dear Sirs,

Without prejudice to the right of the undersigned companies, Gas Plus Italiana S.r.l. and HB Trading S.p.A., to pursue all appropriate legal remedies before the competent authorities in the event that the proposed measure is implemented with consequent increases in tariff-related costs, we hereby submit this formal communication to express our grave concerns and strong objection to the proposed harmonized transmission tariff structure provided under the order of the Regulatory Commission of E-Control amending the Gas System Charges Order 2013 (Gas System Charges Order 2013 - 2nd Amendment 2025, GSNE-VO 2013 - 2nd Amendment 2025).

The issue arises from recent structural changes in the European gas market. The cessation of Russian gas transit via Ukraine has transformed Austria from a net exporter to a net importer of gas. This fundamental change has significantly affected the contractual and economic assumptions underpinning our agreements with TAG, which were originally based on gas flows from Austria to Italy. As a result, the contracted capacity has become commercially unviable. There is no longer any economic spread to justify its use, yet we continue to bear the full cost of capacity reservation without utilizing it. In effect, our long-term commitments now indirectly finance infrastructure developments supporting import flows into Austria - flows from which we

GAS PLUS ITALIANA S.r.l.

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Cap. Soc. € 34.500.000,00 – Cod. Fisc. – P.IVA e Reg. Imp. di Milano, Monza Brianza e Lodi n° 04086420967 – R.E.A. di MI n° 1723947  
Società con unico Socio - soggetta all'attività di direzione e coordinamento di Gas Plus S.p.A.

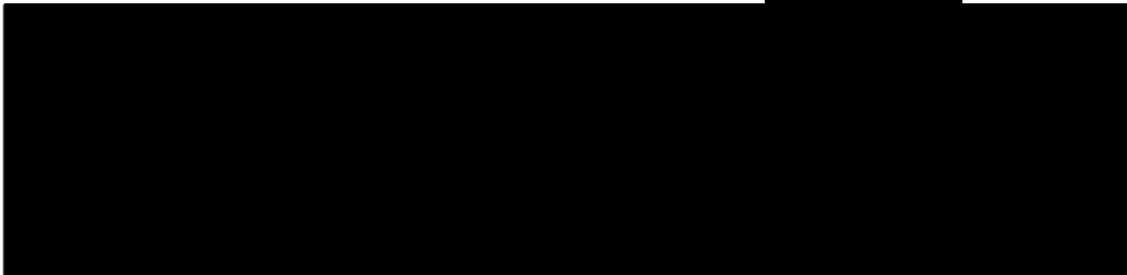
HB Trading S.p.A.

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Tel.: 0187 605932 | Fax: 0187 626923 | Pec: [hbtrading@postecert.it](mailto:hbtrading@postecert.it) P.IVA e C.F.: 06076100962 | Capitale sociale: euro 15.000.000,00 i.v.  
Società soggetta a direzione e coordinamento di CANARBINO S.p.A. (P.IVA e C.F. 01317810115)

derive no benefit. Lastly, please note that on 6 May 2025 it results from official statements by Commissioner Jørgensen on the Commission's roadmap towards ending Russian energy imports foresees for the ban of all imports of Russian gas under new contracts and existing spot contracts taking effect as of the end of this year.

Please consider this letter as a formal and reasoned objection. Therefore, we reserve all rights in this matter.

Yours faithfully,



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