



Consultation on the Gas System Charges Ordinance 2013 – 2nd amendment 2025

Eni's statement

Eni thanks E-Control Austria for the data made available in the framework of the revised consultation on the Gas System Charges Ordinance 2013 – 2nd amendment 2025, that is set to apply as of January 2026.

We point out that the consulted 2026 tariffs constitute a very significant increase in comparison with: i) the tariff levels currently in application for 2025; ii) the, even if indicative, levels for 2026 provided in Annex 3a to the GSNE-VO 2013 for 2025ff on 21/05/2024; iii) the tariff levels stated in the original consultation on the tariffs for 2026, which were published on 17/04/2025. As such, the consulted 2026 tariffs are fundamentally different from any forecasts presented earlier.

The proposed increase, of about 100% at entry points and from 66% to 86% at exit points, is totally unexpected and unforeseeable by network users and may significantly affect the economics and the attractiveness of using the Austrian gas system.

The consequent increase in import costs will impact the economics of gas use in the country. Such a tariff increase - for the second year in a row - will make capacity products in Austria lose competitiveness in all directions and, thus, the recently proposed reshuffling service will likely be of little help to network users.

The magnitude and sudden nature of the proposed increase are undermining users' trust in the system and are discouraging long-term bookings.

Long-term bookings contribute to system stability and should therefore be protected through appropriate safeguard mechanisms.

The key elements of the sudden and massive change in tariffs level should require further justification and reconsideration: taking into account the small level of increase in TSOs allowed revenues for 2026 (ca. +1% vs 2025) and the level of decrease of booked capacities that ECA forecasts in the consultation (overall ca. -40% vs 2025), the above-mentioned tariffs increases are not immediately understandable. Should they be partly stemming from any substantial TSOs revenues gap, other ways should be evaluated in order to recover such additional costs in a way to mitigate the tariff impact, e.g. by diluting any relevant economic amount to be recovered over multi-yearly periods.

We are asking the Austrian regulator to increase the transparency of transmission tariff structures and of the procedures and underlying inputs for setting their values, at the same time ensuring their reasonable predictability. This should enable network users to better understand the tariffs set for both transmission and non-transmission services and how those tariffs have changed, are set and may reasonably change.

The proposal under consultation, if approved, will again heavily and unfairly impact network users with already subscribed capacities, to an extent that they could never have predicted, given the order of magnitude of the tariff increases as highlighted



above: therefore, we ask ECA to consider – if such huge tariffs increase cannot be avoided - the necessity to introduce a tariff increase cap or a “grandfathering” mechanism in order to safeguard existing contracts and to provide acceptable standards of tariff stability and predictability as well as to avoid market distortions; alternatively, a termination option should be considered for capacity holders impacted by such huge, unexpected and unforeseeable tariff increases.

The extent of the proposed change requires indeed a thorough impact assessment and the definition of appropriate mitigation measures, as it is completely undermining market confidence and the ability of market participants to estimate and predict their own service costs in an acceptable manner.

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