

SEFE Marketing & Trading Limited, SEFE Group  
20 Triton Street, London NW1 3BF  
United Kingdom

Date: 06 May 2025

**RE: Gas-Systemnutzungsentgelte-Verordnung 2013 (GSNE-VO 2013) – 2. Novelle 2025 (R SNE G 01/25)**

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 appreciates the opportunity to respond to the yearly update on the consultation according to GSNE-VO.

SM&T thank E-Control for taking the views of the market participants during the consultation under consideration. The reduction of the commodity charge is much appreciated.

However, SM&T is concerned about the stark increase of the transmission tariffs, which translate to +102% for Entry and +75% for Exit. Given that the entry fee increased from 1.37 to 2.77 and, for example the exit fee from Oberkappel and Überackern from 4.31 to 7.56. SM&T kindly request a detailed explanation regarding the observed decrease in the forecasted capacity figures. Specifically, SM&T seek to understand the precise rationale behind these reductions, including a clear breakdown of how the reported percentage changes have been calculated and evolved over time.

Given the significant negative variances noted, it is imperative to confirm whether these shifts are indeed attributable to revisions in forecasted capacity. If so, SM&T would appreciate a thorough account of the assumptions, data inputs, and decision-making processes that have informed the updated forecasts.

In order to properly assess and respond to these developments, it is essential that SM&T are provided with adequate context and background. SM&T therefore urge you to supply a comprehensive report outlining the journey from the original to the revised forecast figures, supported by any relevant analysis or documentation.

Furthermore, the stark difference in the foremost consultation predictions from 17 April to the now revised predictions published on 30 April are unacceptable. The magnitude of these revisions undermines confidence in the forecasting process and introduces a level of unpredictability and volatility, that is detrimental to effective planning and operational stability. SM&T urge that immediate steps be taken to identify the root

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causes of these discrepancies and to ensure proper safeguards to be introduced to prevent such occurrences in the future.

In summary, SM&T kindly request additional context and clarification on the calculations that have led to the determination of the current transmission tariffs.

Kind regards,

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[REDACTED]  
[REDACTED]