

Energie-Control Austria
Rudolfsplatz 13a
1010 Wien
Austria
recht-post@e-control.at

Your ref./date

Our ref.

Liabe/phone

in Malacky

Subject: **Position to consultation GSCO 2013 (GSNE-VO 2013) - 2nd Amendment 2025**

Dear Sir or Madam,

The transmission tariffs for storage facilities connected to Austria's transmission network have been adjusted for the year 2025 showing a disproportionate increase (for the POZAGAS storage facility - Speicher MAB, a year-on-year increase of 143%) due to declining capacity bookings on the Austrian transmission network.

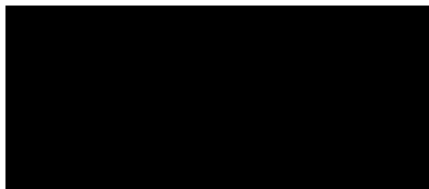
The currently submitted revised draft of the regulation proposes a further tariff increase for 2026 (for the POZAGAS storage facility, an additional year-on-year increase of 75%) in a way that:

- undermine the market value of both newly offered and already contracted storage products
- creates an unpredictable and unstable business environment
- threatens the fulfillment of the fundamental function of gas storage, which is to ensure security of gas supply, enhanced by the current lack of market driven incentives to inject gas in the storage

POZAGAS a.s. strictly opposes the proposed tariff increase and suggests to the regulatory authority E-Control to reconsider the pricing regulation methodology used for transmission tariffs.

Considering that the transmission tariffs in the currently published amendment of the regulation are being increased to an extreme extent, whose impact on the Austrian gas market requires detailed analysis, we hereby respectfully request that the regulatory authority E-Control extend the deadline for submitting comments until **May 30, 2025**.

Best regards,





joint-stock company
Natural gas underground storage

Malé námestie 1
901 01 Malacký
Slovak Republic

COMPANY ID: 31 435 688
Tax ID: 2020357372
VAT ID: SK 2020357372

Phone: +421 34/772 5939

POZAGAS a.s. is recorded in the Commercial Register of the Bratislava III City Court, Volume Sa, Entry 1271/B