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Your ref./date	Our ref.	Liabile/phone	in Malacky
	L-II/721-2024-ROaM	M. Beňa/034-772 5939 ext.214	on 16 th May 2024
	File Nr.: 721-2024-OaM		

Subject: **Comments on consultation GSCO 2013 - 2nd Amendment 2024**

Dear Ladies and Gentlemen,

We welcome the opportunity to comment on the proposed changes to the Gas System Charges Ordinance 2013 – 2nd Amendment 2024 (“GSCO 2013 - 2nd Amendment 2024”) as published on E-Control’s website.

We appreciate that some of our comments, submitted as a part of reference price methodology commenting in accordance with NC TAR, have already been accepted. However, in relation to the proposed tariffs in the GSCO 2013 - 2nd Amendment 2024, we consider it necessary to draw attention to:

1. We consider the increase in the storage connection point tariff for the years 2025-2027 compared to the level of the previous regulatory period to be disproportionately high, threatening the stability of long-term contracts and storage business as such.
2. Since the storage operator in Austria does not have the option to optimize the reservation of transmission capacities using short term booking and must book them exclusively on a basis of the annual tariff (i.e. without using a multiplier), we consider the application of a daily multiplier when calculating the price for cross-border use of storage to be incorrect. We also consider the application of the daily multiplier not in accordance with the NC TAR requirements (the application of multipliers is only possible at border points).

We thank you in advance for considering our comments and we are happy to discuss them with you in further detail.

Best regards,



Martin Beňa
Sales and Marketing Director