



## **E-Control**

Rudolfsplatz 13a,  
1010 Wien  
Austria

Subject:

### **Implementation of the network code on harmonised transmission tariff structures for gas**

Regarding TAR NC E-Control consultation published on 02/05/2024 on the proposed reference price methodology and the resulting indicative reference prices as well as on the proposed discounts, multipliers and seasonal factors, please find views and comments of our company Geoplin d.o.o. Ljubljana:

(1)

Geoplin does not agree with the proposed new tariffs for Exit Murfeld as our most important and relevant import point and considers their increase to be too high and excessive (almost doubled tariff in comparison with current period)

(2)

In addition to the significant increase in the tariff, the introduction of a flow based charge in the amount of 0,13184 €/MWh is also foreseen.

Taking into account all the announced new tariffs, the total price increase at the point Exit Murfeld for Geoplin in 2025 will be 250%.

(3)

Geoplin d.o.o. Ljubljana consider that the new proposed multipliers are basically set too high, and we propose to maintain the factors that currently apply in the existing regulatory period, even better if only they are lowered.

(4)

In summary, Geoplin d.o.o. Ljubljana does not support the proposed drastic tariff increases and the introduction of new higher seasonal factors and additionally flow based charge.

At this point Geoplin d.o.o. Ljubljana appeals once again to the regulator E-Control that the tariffs in need of increase shall be in reasonable range. Such proposed increases are rapidly reducing the attractiveness of using natural gas and causing network users uncontrollable costs.

Best regards

Geoplin d.o.o. Ljubljana



**Geoplin d.o.o. Ljubljana**

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identifikacijska št. za DDV: SI51503581, davčna št.: 51503581,  
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