Energie-Control Austria
Mr. Schmöltzer
Rudolfsplatz 13a
1010 Wien
Austria

Your ref.	Our ref.	Attended to by/ tel.	Place/date
	12483 /2012/PK/ÚOaM	Kučera/2560	Bratislava/September 14, 2012

Dear Mr. Schmöltzer,

Thank you for the possibility to comment the updated E–Control Commission Ordinance Setting the Natural Gas System Charges (Gas System Charges Ordinance 2013) ("Ordinance").

We appreciate to learn from the updated draft Ordinance that the newly introduced yearly fee was reduced to 0.14 EUR/kWh/h in the case of "DZK" though we still do not see any significant underlying costs on the side of BOG to connect the Slovak storages facilities via MAB (unless the newly introduced yearly fee to be paid to BOG will include already the costs of MAB). We especially do not understand why the fee of 0.36 EUR/kWh/h for "FZK" remain untouched.

With reference to Title 2, Section 3, number 2, we are happy to learn that you share our understanding that a firm booking e.g. at the entry point Baumgarten allows the shipper to bring gas not only from the entry point Baumgarten but also from the exit point Baumgarten to any other exit point of the Austrian transmission system. In practical way it means that if the customer wants to inject gas from Virtual Trading Point to the storage he may combine "FZK exit Baumgarten to eustream" with "DZK exit Baumgarten (MAB)" without the obligation to book in addition "DZK entry Baumgarten (MAB)" according to Title 2, Section 3, number 5.

Please let us also highlight that the draft of Market rules does not clarify yet the handling of existing bookings on MAB after January 1, 2013. We fully understand that MAB shall became storage access pipeline which may not be in the first focus on regulation. Thus we are prepared to discuss this topic with you as well as with all other involved parties taking into consideration the fact that under current market model our customers has

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guaranteed firm access from/to Austrian Market (namely Baumgarten).

Please note that above mentioned comments are drafted on the basis of available information and data published by E-control as of today. We hope that our comments will be taken into the consideration when adopting the Ordinance.

Should you have any additional questions or comments to our proposal please contact us any time.

Sincerely,

Pierre Poncik
Chairman of the Board of Directors

Michael Fipper
Vice – chairman of the Board of Directors

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