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

Your ref.	Our ref.	Attended to by/ tel.	Place/date
	7-11567/2012/PK/ÚOaM	Kučera/2560	Bratislava/August 30, 2012

Dear Mr. Schmöltzer,

Thank you for the possibility to comment the E – Control Commission Ordinance Setting the Natural Gas System Charges (Gas System Charges Ordinance 2013) ("Ordinance"), NAFTA understands and supports aim of Austrian regulator to create and develop a liberalized and liquid gas market. We also support the target of minimizing the potential impact on market participants as presented by you. Following this understanding we are sending following comments to the Ordinance.

In order to provide our services to the Austrian market NAFTA´s customers are paying fee for MAB pipeline in the amount of 0.2635 EUR/kWh/hour/year to GCA today.

We now learned from the draft Ordinance which introduced a new yearly fee of 0.28 EUR/kWh/h („DZK") or even 0.36 EUR/kWh/h („FZK") to be paid to BOG. This results in the example of booking 5,7 million kWh/h into an overall yearly payment in the amount of 1,6 million EUR or even more than 2,0 million EUR without – according to our knowledge - any significant underlying costs on the side of BOG to connect the Slovak storage facilities.

Knowing the expectations of GCA to keep the fees of MAB unchanged we propose to implement one of the following two alternatives. Either the newly introduced yearly fee to be paid to BOG will include already the costs of MAB (i.e. BOG fulfills the abovementioned expectations of GCA) or - in order to simplify the fee structure and to align it with the underlying costs of the connection of the storage facility – the newly introduced fee should be canceled (or decreased significantly to the maybe underlying administrative costs).

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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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