Autorità per l'energia elettrica e il gas

Il Presidente

E-Control
Rudolfsplatz 13A
1010 Vienna - Austria

Milan, 30th August 2012

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PROT.GENERALE / P

Dear sirs,
we refer to the consultation draft of the Gas System Charges Ordinance 2013 issued by E-Control's Regulation Commission and made available also in an English translation last 27th August.
You may of course understand the important role that the future regulation of the Austrian gas transport network plays for the European market as currently (and potentially even more in the future) an important share of its total supplies transit through this network and its main physical hub (Baumgarten).

In this respect we would like to express some elements of concern raised by the ongoing consultation process.
First of all, in consideration of the relevance of the document, we deem not appropriate the short period of time made available for the stakeholders' reaction.
In addition we believe it could have been beneficial to present more elements of the underneath methodology used to allocate the network costs and to derive the tariff values published in the document. In particular we believe that additional measures may be considered in order to ensure the non-discrimination principle for access to transport in order to supply the Austrian market or other foreign ones, with special reference to the Italian, as we believe this prerequisite to be of the utmost importance for the sake and efficiency of the future European gas market.

In consideration of the importance of your Commission decision I invite you, on behalf of the AEEG's Board convened at the today meeting, to consider the possibility to extend the deadline for stakeholders to participate in the consultation process, providing additional information on the adopted methodology and the guiding criteria for the next tariff regulatory period.

Best regards,

Guido Bortoni

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