

Energie-Control
Rudolfsplatz
A-1010 Wien
Austria

Malacky, December 15, 2011

Subject: Comments to the E – CONTROL concerning interim reports on KEMA entry-exit and balancing

To whom it may concern:

POZAGAS a.s. would like again welcome initiative of E-control for a transparent documentation and a public commenting of the amendment to gas market rules and associated documents.


Even though most of the comments to KEMA study shall be answered by the shippers and TSO`s, POZAGAS, as a Storage Operator operating facilities directly connected to the Austrian network, would like to express a general comment to the part of the paper which might have impact to the storage system operators and their customers, i.e. the second question listed on your website.

With a direct allocation of network costs to storages, how do market participants see the network charges at storage sites set solely on the basis of annual capacity products? Should network charges reflect the individual usage of the storages (e.g. through short-term capacity products)?

We are of the opinion that more detailed information for the individual schemes for Network charges at storages sites presented on the slide 10 of KEMA "Principles of Entry-Exit Tariffs Setting Project Commission by E-Control" is required to be able to answer this question sufficiently. Currently, based on KEMA interim study, it is our understanding that the "Full Socialization Cost" scheme reflects POZAGAS position, i.e. that the new entry/exit fees system shall remain neutral from the financial point of view and shall not create any additional fees and is in line with the position POZAGAS presented to E-control on December 15, 2011.

We are happy to discuss our comment with you at your convenience.

Sincerely



Pierre Poncik
Chairman of Board of Directors
POZAGAS a.s.