

E-Control
Rudolfplatz 13a
1010 Vienna, Austria

15 May 2018

Subject: EFET¹ response to E-Control consultation on changes to the natural gas balancing regime

EFET welcomes the opportunity to comment on the proposed changes to the Austrian natural gas balancing regime. Over the past years our association has raised a number of concerns towards the functioning of the Austrian gas balancing system and we are very pleased to see E-Control's commitment to improve it. Through our comments below, we would like to further enhance the process, so that the adjustments to the Austrian gas system balancing are delivered as soon as possible, for the benefit of all the parties involved.

To begin with, we would like to highlight that we believe that neither within-day obligations nor the respective imbalance tolerances were sufficiently motivated in the proposal, as envisaged by Art. 26 of NC BAL. We believe that the proposal should clearly and objectively demonstrate how suggested threshold for ensuring network stability was calculated. Alternatively, the new balancing model could retain the option of introducing within-day obligations at a later date in case they prove to be necessary for maintaining grid stability.

EFET remains critical of the suggested delay in providing relevant data on imbalance settlement. We stress the need for shippers to receive the relevant imbalance data on D+1. We welcome information regarding the system as well as a shipper's imbalance status being made available hourly throughout the day for the benefit of the network transparency and balancing efficiency. But we would also like to raise the importance of the quality and accuracy of data being published, especially with regard to the envisaged within-day obligations.

With regard to the suggested settlement frequency or outsourcing of clearing activities, EFET holds no preference, as long as these decisions have no impact on the costs incurred by the shippers. We also urge E-Control to closely replicate the neutrality provisions envisaged by NC BAL so as not to risk cross-subsidization.

¹ The European Federation of Energy Traders (EFET) promotes competition, transparency and open access in the European energy sector. We build trust in power and gas markets across Europe, so that they may underpin a sustainable and secure energy supply and a competitive economy. We currently represent more than 100 energy trading companies, active in over 27 European countries. For more information: www.efet.org.

Finally, we understand that any early implementation of the new balancing regime would require broad alignment of all stakeholder positions and we are happy to support E-Control's efforts in this process. We would also like to offer our support in further development of the balancing system following the best practices for making it flexible and cost-efficient.

Kind Regards,
On behalf of EFET TF CSEE-G



Davide Rubini,
Chairman of EFET TF CSEE-G