

E-Control

Rudolfsplatz 13a,

1010 Wien

Austria

Subject:

Implementation of the network code on harmonised transmission tariff structures

Regarding TAR NC E-Control consultation published on 31/01/2019 on the proposed reference price methodology and the resulting indicative reference prices as well as on the proposed discounts, multipliers and seasonal factors, please find views and comments of our company Geoplin d.o.o. Ljubljana:

(1)

Geoplin supports the reduction of the tariff on Exit Murfeld point as published in the E-Control consultation document or at a value of 2,23 EUR/kWh/h according to the "Capacity based method" or 2,07 EUR/kWh/h according to the "CWD" method.

(2)

Regarding level of multipliers for the entire Market Area East as proposed in consultation document Geoplin d.o.o. Ljubljana proposing following adjustment:

Geoplin d.o.o. Ljubljana consider that the multipliers are basically set too high, in particular, we must emphasize that there is no reasonable argument for such a difference between multiplier for product Day and Within-day and shall be set on the same level.

	Year	Quarter	Month	Day	Within day
TAR NC limits	1	$1 \leq M \leq 1,5$	$1 \leq M \leq 1,5$	$1 \leq M \leq 3$	$1 \leq M \leq 3$
Existing (2019)	1	1,05	1,15	1,30	1,30
E-Control proposal	1	1,15	1,30	1,50	2,00
GEOPLIN proposal	1	1,05	1,20	1,30	1,30

Geoplin's arguments for adjusting multipliers are based on the following facts:

- Geoplin considers that reducing the multiplier for a standard product would significantly affect the increase in cross-border flows, thereby significantly increasing the transmission system's utilization in order to improve the competitiveness of the transmission route towards Italy and Croatia.
- With the appropriate reduction of the tariff structure of the exit points in the direction of the mainstream "north-south", it is possible to significantly increase the competitiveness of these directions.

Executive Director
Gregor Lukman

