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Subject: Reply to 2nd consultation on commodity-based charge (TAR NC)

Dear Sir/Madam,

Shell confirms the comments already provided to this Authority in its reply to the consultation issued on January 14th, 2022. In particular, we welcome the introduction of a commodity charge in the tariff structure aimed at covering fuel costs, because we are convinced that it allows a higher level of cost reflectivity and higher level of transparency.

In our previous reply we also noted the importance to provide increased visibility over the methods and the timing for the revision of the tariff. This would be in line with those TAR NC provisions aimed at promoting stability of transmission tariffs for network users and consenting them to understand how tariffs are set and may change.

We are surprised to see, instead, that the proposed approach by this authority would be to anticipate such a material change, like a structural modification to the tariff methodology and introduction of a commodity charge, to the 1st of June (instead of 1 October as previously proposed).

Anticipating the introduction of a new charge would have clearly the opposite effect on operators, reducing transparency and predictability of the tariffs in Austria and would be not in line with TAR NC principles mentioned above.

We therefore urge this authority to reconsider the proposal to anticipate the introduction of the commodity charge to June 2022.

Finally, we note that operational costs (reflected in the newly-established commodity charge) has doubled since the initial proposal. We recognize that the current cost environment may require a larger tariff increase than previously anticipated, nevertheless, with the aim of further contributing the reduction of system costs for operators and final costumers and encouraging greater network utilization, we would like to confirm the need to develop an appropriate and definitive incentive mechanism that would ensure an efficient management of all operational costs.

Best regards



Simone Diodato Antonelli

Regulatory Affairs Team Lead - South and East Europe

Shell Energy - Europe and Environmental Products