

## **E-Control's consultation on Tariffs**

### **Gas-Systemnutzungsentgelte-Verordnung 2013 – Novelle 2016, GSNE-VO 2013 – Novelle 2016**



### **EFET comments – 16 November 2015**

The European Federation of Energy Traders (EFET<sup>1</sup>) welcomes the opportunity to provide comments on consultation document **Gas-Systemnutzungsentgelte-Verordnung 2013 – Novelle 2016, GSNE-VO 2013 – Novelle 2016** and highlight a number of important concerns we have in this regard.

Although we understand that the changes presented are merely the result of modifications intervened at the input level (lower forecasted contracted capacity and increased investment) we regret having very limited information behind the different relevant elements.

Consultations are best developed when network users are put in a condition to critically assess and quantitatively evaluate the content of a proposal. When it comes to tariff definition this is even more important. Specifically, a consultation on tariff would be best carried out on the basis of:

- A fairly accurate description of the tariff model used;
- A detailed quantitative and qualitative description of the relevant aspects behind the changes affecting the input to the tariff methodology.

Unfortunately, in this case the lack of the above elements prevents us to go beyond a set of very high level comments.

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<sup>1</sup> The European Federation of Energy Traders (EFET) promotes and facilitates European energy trading in open, transparent, sustainable and liquid wholesale markets, unhindered by national borders or other undue obstacles. We currently represent more than 100 energy trading companies, active in over 28 European countries. For more information, visit our website at [www.efet.org](http://www.efet.org).

Tariff stability and predictability stand at the core of the attractiveness of a market. The ability of network users to anticipate tariff developments long ahead they become valid is key to the definition of a sales strategy as well as necessary to allow suppliers and end consumers to best allocate contractual risks.

With the above in the background, we note that in systems like the Austrian one that do not foresee any mitigation measure in case of tariff change, like for instance those present in Germany or Belgium (possibility to exit in full or in part transportation contracts in case of tariff spike), transparency and completeness of information on tariffs play an even more important role.

As a footnote to these comments we also highlight that EFET regards having consultations in English as one of the component leading to the formation of a well-functioning and well-participated hub. We insist on this comment being taken on board for future reference.

We thank you for your kind attention and remain available for further comments.