

Statement:

Public Consultation – Gas System Charges Ordinance 2013 – Amendment 2021



November 12th, 2020

1. Preamble

Trans Austria Gasleitung GmbH ("TAG GmbH") hereby welcomes the possibility to comment in the framework of the public consultation of the Gas System Charges Ordinance 2013 – Amendment 2021 ("Gas-Systemnutzungsentgelte-Verordnung 2013 – Novelle 2021").

2. Section 3 para. 10

Section 3 para 10 of the Gas System Charges Ordinance 2013 refers to a timely restriction of maintenance activities.

Maintenance activities are performed by the TSOs to maintain the viability of the transportation system

- in case of damage,
- to respect maintenance cycles defined by the life cycle of the equipment,
- to respect safety standards (test of emergency shut down systems), and
- to ensure security of supply

These maintenance works are planned with the aim to keep the impact of the maintenance works on the network users as small as possible. This is done by

- planning maintenance works at times when it has the least impact on the market (transportation periods with less demand),
- combining different maintenance works (also in cooperation with adjacent TSOs) and
- limiting the impact on the market by spreading the maintenance works over a longer period, thus minimizing the hourly restriction.

The draft of the Gas System Charges Ordinance 2013 - Amendment 2021 foresees that

"In section 3 para. 10, after the words "in line with point 3.3(1)(g) of Annex 1 to Regulation (EC) No 715/2009," the following phrase is added: "and in the event of transport restrictions at an entry/exit point that exceed a total duration of 360 hours during a gas year."

TAG GmbH currently offers the balance groups the opportunity to nominate 100% of the allocated capacity also during maintenance works. Only in the event that the sum of all nominations exceeds the available technical capacity, a reduction in accordance with the terms of the capacity contract is applied. In case that the accumulated nominations are smaller than the available technical capacity, there is no impact on the market and no reimbursement will be applied.

For avoidance of any doubt, TAG GmbH suggests to clarify in the ordinance that for the calculation of the 360 hours (full capacity reduction equivalent), only those hours shall be taken into account, when the accumulated nominations exceed the available technical capacity.