



**MARKET CONSULTATION ON THE DRAFT AMENDMENT 2017 OF THE  
GAS SYSTEM CHARGES ORDINANCE 2013  
(GSNE-VO 2013 – Novelle 2017)  
Eni's response**

Eni S.p.A. provides hereby its comments on the draft of the Amendment 2017 of the Gas System Charges Ordinance 2013 (*Gas-Systemnutzungsentgelte-Verordnung 2013 – Novelle 2017*, *GSNE-VO 2013 – Novelle 2017*) published on E-Control website on 24 October 2016.

We appreciate the proposed general reduction of transmission tariffs and the recalculation of the entry-exit split of the TSOs' allowed revenues in line with the principles of the recently approved EC network code on harmonized transmission tariff structures for gas (hereinafter TAR NC). This latter, in particular, has contributed to the balancing between the costs of gas transits (towards Italy and Germany) and those charged on gas sales in the Austrian market.

We also share the reasoning that have brought to the adjustment of the multipliers for capacity bookings for less than one year in line with the TAR NC and, in particular, the proposed application of multipliers greater than 1 to day-ahead and within-day products. However, we do not see grounds to support the differentiation of the multipliers between entry and exit points. This also considering that the corresponding tariffs are already differentiated, being generally lower for entry points.

Having said that, we regret having to highlight once again the lack of transparency of the process for the determination of the revenues of transmission system operators and for the derivation of transmission and non-transmission tariffs in Austria, that prevent network users to understand how such tariffs have changed, are set and may change, to understand the costs underlying transmission tariffs and to forecast transmission tariffs to a reasonable extent. This lack of transparency, together with the tardive publication of the draft *GSNE-VO 2013 – Novelle 2017* and the short time granted to operators to provide their comments, also prevent network users from efficiently participate to the consultation on the basis of a complete analysis. We cannot help but underline that this lack of transparency is deeply in contrast with one of the main aims of the TAR NC and, in particular, with chapters VII and VIII thereof providing for consultation and publication requirements.

San Donato Milanese, 11 November 2016

Eni SpA