



Konzultační formulář

Consultation form

Konzultační dokument podle Článku 26 Nařízení Komise (EU) 2017/460 ze dne 16. března 2017, kterým se zavádí kodex sítě harmonizovaných struktur přepravních sazeb pro zemní plyn

Consultation Document in accordance with Article 26 of Commission Regulation (EU) 2017/460 of 16 March 2017 establishing a network code on harmonised transmission tariff structures for gas

Dotčený subjekt

Interested party

Regulační orgán Regulatory authority		Provozovatel distribuční soustavy Distribution system operator
Ministerstvo nebo vládní organizace Ministry and governmental institution		Provozovatel zásobníku plynu Storage system operator
Místní samospráva Municipality		Dodavatel plynu, obchodník Gas Supplier, Trader
Akademická sféra Academia		Zákazník Customer
Provozovatel přepravní soustavy Transmission system operator	X	Jiný Other

příslušné zařazení prosím označte X
please mark with X

Identifikace

Identification

Jméno právnické osoby Name of legal person	Český plynárenský svaz
Jméno a příjmení odesílatele Name and surname of the sender	
E-mailová adresa E-mail address	
Telefonní číslo Telephone number	
Datum Date	

Připomínky a podněty (v případě potřeby prosím přidejte další řádky)

Comments/initiatives (please add rows as needed)

Kapitola Chapter	Připomínky a podněty Comments and initiatives
	<p style="text-align: center;">The CGA's opinion on the transmission tariffs proposed for 2020-2025</p> <p>Transmission tariff setting is one of the ERO's key tools determining the Czech gas market's structure and working and also the Czech Republic's position as a transit country. The CGA therefore welcomes the fact that the ERO granted enough time to the market participants for responses in this consultation.</p> <p>The gas market participants represented in the CGA hold a broad range of views, and the CGA therefore returns just one united opinion supported by all of its members. We also expect that CGA members will use the opportunity to provide their additional comments separately in this consultation.</p> <p><u>The CGA raises the following comments:</u> The ERO's consultation document proposes a significant increase in the tariffs for transmission to/from storage facilities, even when we factor in the minimum discount of 50%, the granting of which is allowed by Article 9(1) TAR NC. In the document, the ERO itself notes that gas storage has faced strong market pressures in recent years (page 23).</p> <p>The CGA considers that the setting of tariffs for transmission to/from storage facilities can be a suitable tool to help increase their utilisation, and hence for securing gas supply in cases of gas shortages. Storage facilities are not standard supply points but an active element in the system making it possible to structure gas flows in time and also infuse the required compression into the system; their existence is therefore in the interest of all market participants. In addition, some Czech storage facilities help to cut the system operating costs by operating shared regulating stations for transmission and distribution systems, thanks to which system operators do not have to make additional investments.</p> <p>It is thanks to the national specificities that the TAR NC allows, in the case of storage, to set such a discount from the standard calculation of the reference price, which reflects the storage assets' added value for the gas system and customers.</p> <p>It is in the Czech gas industry's and customers' interest to preserve storage facilities in the country, primarily for their systemic benefit for the system and for their function as a security element in the gas system. The CGA believes that in view of storage facilities' high added value the ERO should reconsider the tariff for transmission to/from storage and the flow-based charge and set them as low as possible. This level should not exceed the current tariff to prevent damage to the traders that have bought storage capacity for 2020 and beyond and further increases in the economic pressure on SSOs. The regulator can gain inspiration from, e.g., 90-100% discounts proposed in TAR NC consultations in other countries (Denmark, Hungary, Portugal, and Sweden).</p> <p>We are ready to continue discussing the transmission tariffs with the ERO.</p>