



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 harmonized 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 | X | Dodavatel plynu, obchodník Gas Supplier, Trader |
| Akademická sféra Academia | | Zákazník Customer |
| Provozovatel přepravní soustavy Transmission system operator | | Jiný Other |

příslušné zařazení prosím označte X

please mark with X

Identifikace

Identification

| | |
|---|--------------------|
| Jméno právnické osoby Name of legal person | Gazprom export LLC |
| 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 |
|-----------------------------|--|
| 9.1.5 | <p>We note that the proposal of ERÚ constitutes an approximately 5% aggregate increase of costs for Gazprom export LLC, that is a 100% owned subsidiary of PJSC Gazprom ensuring a reliable and sustainable gas supply to EU importing countries, with its sufficiently large portfolio in the Czech Republic gas transportation market. Even such moderate percentage of costs increase results in a significant increase of costs for GPE.</p> <p>However, we believe that the risk of declining transmission capacity bookings mentioned by ERÚ is not addressed accordingly. Application of different methodologies for national transmission and for transit transmission pricing (revenue cap and price cap) and different rates of return to the relevant assets is not encouraging higher transit flows, therefore the risk of insufficient bookings of technical capacities and covering of the related costs in the end arises. Certain concerns about the cross-subsidy of domestic consumption against the transit arise with WACC for international transmission of 8,18% applied to the regulatory asset base (RAB), including risk of declining transmission capacity bookings premium, and only of 7,94% for 2020 and thereafter of 6,72% for 2021 to 2025 for national transmission applied to RAB.</p> |
| 6.2.4 | <p>We believe that a limited discount to the applicable transmission tariffs at storage facilities connection network points with proposed increase of exit tariffs at underground gas storages by +750% (assuming that the +1500% is estimated before the discount is applied) also do not encourage the use of the gas transmission network and jeopardize the security of supplies in general. Double charging of tariffs for transmission when using storage facilities capacities would not be cost-reflective and GPE considers the proposed 50% discount being too low. The use of storage facilities is beneficial for the network and the security of supply in general. Therefore, we would respectfully propose for ERU to consider to exempt the use of storage facilities completely or almost completely from entry and exit tariffs.</p> |
| 8.1 | <p>We would like to address the level of multipliers. Even corresponding to average levels of multipliers for TSO's in Europe the consulted level of multipliers seem to be too high provided that booking of non-yearly capacities must be seen as a means of avoiding vacancy costs because short-term capacity products increase the utilization of the network, including in times where gas flows are generally low, and create incentives for bookings in cases in which long-term capacity products</p> |

| | |
|--|---|
| | <p>would not be worthwhile and there would therefore not be any demand for them. In actual fact therefore non-yearly capacity products reduce vacancy costs. Given this situation, we believe that the selected multipliers shall be reconsidered downwards, as they seem to be not cost-reflective and increase the volume risk.</p> |
|--|---|