



## 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

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

*příslušné zařazení prosím označte X*

*please mark with X*

#### Identifikace

Identification

<b>Jméno právnické osoby</b> Name of legal person	Pražská plynárenská Distribuce, a.s., člen koncernu Pražská plynárenská, a.s.
<b>Jméno a příjmení odesílatele</b> Name and surname of the sender	
<b>E-mailová adresa</b> E-mail address	
<b>Telefonní číslo</b> Telephone number	
<b>Datum</b> Date	

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

Comments/initiatives (please add rows as needed)

<b>Kapitola Chapter</b>	<b>Připomínky a podněty Comments and initiatives</b>
19.2.3	<p>We are convinced that the proposed gradual increase, ultimately by orders of magnitude, in the flow-based charge for customers connected to the transmission and distribution systems and customers using storage facilities (which is set out on page 77 in Table 34 and on page 81 in Table 39) will amount to a considerable increase in the customers' costs and also, primarily in combination with the proposed increase in the capacity component of the tariff for transmission from/to storage facilities, a heavy burden on storage facility users (and in turn operators).</p> <p>According to the proposal, this increase is due to the expected higher use of the transmission network for transit, for which compressor stations will have to be used some more. In the ideal option we would expect that in particular the transit users of the network will bear such costs.</p> <p>For the above reason we regard the proposed increase as inconsistent with the TAR NC's general principles, which suggest that costs must be allocated so as to reflect the correlation between cost drivers and cost allocation. Nevertheless, we are aware that this inconsistency is mainly caused by Article 4(3) TAR NC and appreciate that the ERO has proposed cost allocation using the CWD model in the commodity component of the tariff too. Yet again, we consider that in the light of the intensity of the impact, additional avenues should be explored with a view to reducing the impact on customers and storage facilities. We therefore recommend analysing this issue further, and also in connection with setting the parameters for the fifth regulatory period. We recommend checking, in particular, that the level of variable costs is in line with the allocation ratio for transit network use by intra-system transmission.</p> <p>Furthermore, any gas system modifications that are also beneficial for national transmission can be included in the TSO's regulated asset base and subsequently reflected in the capacity-based tariff. However, the commodity component is directly tied to the operating costs incurred in the actual gas flow, and in this respect transferring the extra costs of higher transit to domestic transmission customers is unjustified. We therefore require that all extra costs of gas compression, which are reflected in the flow-based charge, be transferred to the transit users, i.e. into the transmission tariff for exit from the Czech Republic, and that the current level of tariffs be maintained and only adjusted by the gas and EUA prices in the future.</p>