



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

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

příslušné zařazení prosím označte X

please mark with X

Identifikace

Identification

Jméno právnické osoby Name of legal person	ČEZ a.s.
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
10.1 and related	<p>For the application of the CWD methodology, the ERO has determined physical localities for four types of points. Compared with the current practice, the delivery point between the transmission network and distribution systems and the exit point for directly connected customers have been merged. We consider that this approach departs from the CWD methodology and fails to match the principles set by the ERO itself, i.e. a fair allocation of costs to the various users and finding a revenue split that would minimise disruption in the continuity of new prices with the current prices.</p> <p>We require that a physical point(s) for directly connected customers is created in the CWD model for the Czech entry-exit system. With its technical capacity of about 5 million m³/day, the Počerady Power Station is a major customer for natural gas and with regard to its site, which is very close to the basic entry point, the Brandov VIP, and to the use of the CWD methodology, it should bear only the costs that reflect this very short distance of about 40 km. Subsuming this point under a common physical point shared with DSOs, which is significantly farther to the southeast at a “weighted” distance of 228 km from the Brandov VIP, creates a massive and obvious cross-subsidy disfavouring the directly connected customer Počerady Power Station.</p> <p>We would add that for example in the UK, where they now apply the CWD methodology, large directly connected customers have their own physical points and prices.</p> <p>We regard this comment as a fundamental comment.</p>
9.1.6	<p>When setting the tariffs for the entry/exit points of storage facilities the ERO intends to use only a 50% discount from the basic tariff calculated purely on the CWD basis. However, Article 9(1) TAR NC sets out this value as the minimum discount intended to be used to prevent double charging. It would therefore be fully in line with the Regulation if the ERO applied a much higher discount to the points of storage facilities, thereby preventing a price hike of almost 1,500% at exit points from storage facilities.</p> <p>The currently proposed value is an unprecedented insensitive interference with the well-working natural gas market in the Czech Republic and can cause discrimination against the gas market participants who have decided to arrange structuring and flexibility through the infrastructure in place in the Czech Republic. Naturally, the proposed insensitive interference would also be reflected in the price for keeping the security standard and in fact is more likely to contribute to a decline in <i>de facto</i> providing for the security standard through storage facilities located in the Czech Republic, which is not desirable.</p> <p>Resigning on the use of a greater discount from tariffs for storage facility points is contrary to the ERO’s own principles for TAR NC application, i.e. finding a revenue split that would minimise disruption in the continuity of new prices with the current prices for transmission.</p> <p>We therefore request the application of a discount at a level that will be, in terms of the sum of the entry and exit tariffs at storage facility points, as close as possible to the sum of the current tariffs for storage facilities.</p> <p>We regard this comment as a fundamental comment.</p>
17 (19.1.4)	<p>Variable component – the commodity-based tariff</p> <p>The variable component of the price has been historically conceived to meet the costs of compressor station running. In addition to the costs of procuring the commodity itself, the inputs to the calculation also include the related costs of the excise duty on gas and the costs of CO₂ allowances. The proposed new concept for the period after 2020 also envisages the same basic philosophy. It is quite objective to reflect the development of the prices of these inputs in the variable component of the price.</p>

Chapter 19.2 of the Consultation Document clearly indicates a dramatic increase in the variable component of the transmission tariff at the DSO exit point, and hence also for directly connected customers, while the reason for this is not substantiated in a transparent and detailed manner.

Chart 9 in Chapter 10.4 clearly shows that the intra-system gas flows, i.e. primarily for the DSO point and directly connected customers, remain more or less constant for the whole period under review until 2025. The only change compared with the current situation is a significant increase in the gas flow in the Brandov-Lanžhot direction. If this additional gas flow is expected to cause an increase in compression work, and thus an increase in the total cost of compressor station running, these increased costs should be fairly allocated primarily to the variable component of the cross-system exit tariff. They should not be transferred to the intra-system exits, which are not causing any additional costs.

This methodological deficiency is even more visible in the case of the transmission network's exit point for the directly connected customer Počerady Power Station, located at a distance of some 40 km from the Brandov VIP; in principle, compressors do not have to be used to supply gas to this customer. The principle of the fair allocation of costs is obviously being breached.

In Chapter 19.1.4 the Consultation Document indicates that the current level of the variable component of the tariff fails to match the current actual costs of compressor station running and mentions a ten times higher figure as the matching price, but it does not offer any more detailed explanation or historical figures.

Due to our concerns about the introduction of cross-subsidies disfavouring intra-system users, we request a detailed analysis of the compression work required for the current arrangements (without the new transit flow) and for the future arrangement. The analysis should make it clear how much gas and at what specific compressor stations is being and will be consumed in the future for ensuring the contract pressures at each of the exit points from the transmission network and whether or not any change is also taking place in this contract parameter.

Based on our findings, we request an adjustment to the methodology so that costs induced by cross-system gas flows are not transferred to intra-system customers, which is one of the principles pursued as mentioned in Chapter 9.1.7

We regard this comment as a fundamental comment.