



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 checked="" type="checkbox"/>	Regulační orgán Regulatory authority	X	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 type="checkbox"/>	Dodavatel plynu, obchodník Gas Supplier, Trader
<input type="checkbox"/>	Akademická sféra Academia	<input 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	GasNet, s.r.o
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
Whole document	Only the TSO was invited to help write a document that has a fundamental influence on the regulation of both international and national transmission prices, although the ERO controls the price of the regulated activities as a whole, i.e. including distribution. Involving DSOs and SSOs in discussions as late as public consultation cannot be regarded as good practice in our view.
Whole document	The information on the CWD model itself and the provided file with tariff calculation, TAR_NC-Simplified Tariff Model, do not make it possible to make any other calculations or to model potential alternative scenarios. The calculations in the document therefore basically cannot be checked and commented on. From the consultation participants' perspective it is therefore a 'black box' and they have to trust the authors that they have opted for the best solution.
16.1.3	In 2020-2025, the allocation of total costs to intra-system (national) and cross-system (transit) is kept at approximately the same ratio of 26:74. But the increase in the TSO's total costs is mainly due to increased cross-system transmission, as can be seen in, e.g., Table 30, where the national flows will grow by only 7% while the transit flows will grow by almost 40% between 2020 and 2025. Cross-system transmission should therefore take a much higher percentage of total costs, or such costs should be allocated directly. The setting of tariffs and mainly their annual changes specified in 19.2.2 therefore do not reflect the cost drivers. It can also be considered that cross-subsidisation is taking place between transit and national transmission, disfavouring consumers in the Czech Republic.
19.1.2	<p>The drop in the Waidhaus VIP transmission tariff is not clearly explained, especially when taking into account the long-term transmission capacity plan as contained in NET4GAS's <i>Long-term Available Capacity Forecast</i>, which indicates that Waidhaus VIP has a contracted exit capacity comparable with the Lanžhot point.</p>  <p>20180821_dlouhod oba_predpoved_vol</p>
19.2.3	With regard to the forecasted gas flows in the system (e.g. Table 30) it is not clear why commodity-based tariffs surge at exit to distribution and storage. In this case again we believe that the costs of compression work, predominantly attributable to a large volume of transit, should be allocated to transiting participants/users and should not impact customers in the Czech Republic as their consumption does not basically change, judging also by the forecasts contained in the consultation document.