



**Consultation publique du 19  
octobre 2017 N°2017-014  
relative à la mise a jour du  
tarif d'utilisation de transport  
de gaz de GRTgaz et TIGF au  
1<sup>er</sup> avril 2018**

**Enagás comments**

**NON-CONFIDENTIAL RESPONSE**

10<sup>th</sup> November 2017

## 1 Introduction

1. Enagás welcomes CRE's new opportunity to contribute to the public consultation on new tariffs for the use of gas transmission networks of GRTgaz and TIGF.
2. Enagás has already expressed its concerns in previous ATRT6 previous consultations<sup>1</sup> and its participation in this new consultation is motivated by the measures related to transmission tariffs, which may have a relevant impact on the Spanish system.
3. Enagás response to this consultation is **not confidential and not anonymous**.

## 2 Questions

**Question 2. Etes-vous favorable au maintien, jusqu'au 1er avril 2019, de deux PITS Nord-Atlantique et Sud-Atlantique distincts?**

4. Enagás would like to reiterate the position expressed in March and September public consultations.
5. As expressed in previous ATRT6 public consultation, tariffs should be the result of the application of a methodology, taking into account costs and expected flows, and not the result of ad hoc decisions on cost allocation applied on top of existing tariff levels.
6. The explicit criteria applied by the CRE with the purpose to "*aligner les coûts des deux routes de transit France-Espagne et France-Italie*" ("users of the transit system (Dunkirk-Pirineos and Dunkirk-Oltingue roads was the terminology used in previous consultations for the ATRT6) would remain constant over the ATRT6 period") denotes that either (1) there is no methodology as such, and *ad hoc* decisions on top of existing TPA tariffs are being made, or (2) the methodology incorporates a restriction to maintain certain tariff levels, that may discriminate between national consumption points and IPs.
7. As a general consideration, **if a non-discriminatory methodology is applied, the exit tariff at VIP Pirineos should not significantly differ from the exit tariff from the high-pressure transmission network in the Southern part of France.**
8. The position that users of the transit system should have a constant cost in ATRT6, equal to that in ATRT5, can only be maintained if the current cost is also maintained in the future for users exiting in the Southern part of France.

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<sup>1</sup> CRE, "[Consultation publique de la CRE relative aux prochains tarifs d'utilisation des réseaux de transport de gaz de GRTgaz et TIGF et aux prochains tarifs d'utilisation des terminaux méthaniers régulés](#)". February 2016

CRE, "[Consultation publique de la CRE du 27 juillet 2016 sur le prochain tarif d'utilisation des réseaux de transport de gaz naturel de GRTgaz et TIGF](#)". July 2016

In other words, **it is not possible to have a distance-based methodology for transits, but not for national consumption.**

9. In particular, it is **incorrect to make reference to transit routes (transit systems in previous public consultations) where there are no dedicated infrastructures for transit**, regardless the fact that some shippers may be effectively transiting gas from an entry to an exit. Although there were **no basis in the French system to apply the "asset cost split" (included in previous versions of the draft TAR NC)**, this will no longer possible as it has been deleted from the TAR NC (Regulation 2017/460).