



# **Consultation publique relative à la mise à jour des tarifs d'utilisation des réseaux de transport de gaz au 1er avril 2014**

Enagás comments

8<sup>th</sup> November 2013

## 1. **Questions**

**Q1:** *Etes-vous favorable au maintien des tarifs des PITS en zones GRTgaz et à la baisse de ceux du PITS en zone TIGF ? Quel facteur entre les tarifs du PITS en zone TIGF et ceux du PITS en zone GRTgaz Sud vous paraît le plus adéquat ?*

1. The proposed measure to progressively align these tariffs in France would seem to be consistent with the establishment of a single virtual underground gas storage, which is not the case.
2. While Enagás recognises that an special treatment of transmission tariffs for underground storage is frequently justified, it must be highlighted that CRE's proposal to lower the PITS tariff in the TIGF area is included in the same document that justifies an increase in the general level of exit tariffs (for both national consumption and export) in the South to compensate for the loss of revenue between the GRTgaz South-TIGF link.
3. Maintaining the current PITS tariff, the total cost of delivering gas from the North to an underground storage in the TIGF area, and moving it back to the North, would already be lower thanks to the reduction between GRTgaz South and TIGF areas. And it would allow for a more balanced reallocation of costs to other exit points.

**Q9:** *Etes-vous favorable à la prise en compte du JTS à 50% au CRCP ?*

4. There should not be capacities at IPs reserved for specific routes. If the utilization of an entry point wants to be favoured for justified reasons, appropriate market mechanisms should be implemented.
5. This position has been previously expressed by Enagás in its responses to (1) the public consultation on the commercialization of transmission capacity on the link between GRTgaz's North and South link and the GRTgaz/TIGF interface<sup>1</sup>, (2) the public consultation regarding rules for the sale of transmission capacity at the link between GRTgaz the North and South zones<sup>2</sup>, (3) the public consultation about the allocation of transmission

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<sup>1</sup> CRE, "Public consultation by the French Energy Regulation Commission on the commercialization of transmission capacity on the link between GRTgaz's North and South link and at the GRTgaz/TIGF interface". 31 July 2012. Available at:

<http://www.cre.fr/en/documents/public-consultations/commercialization-of-transmission-capacity-on-the-link-between-grtgaz-s-north-and-south-link-and-at-the-grtgaz-tigf-interface/public-consultation-by-the-french-energy-regulation-commission-on-the-commercialization-of-transmission-capacity-on-the-link-between-grtgaz-s-north-and-south-link-and-at-the-grtgaz-tigf-interface>

<sup>2</sup> CRE, "Public consultation by the CRE on the commercialization of transmission capacity on the link between GRTgaz's North and South link and the GRTgaz/TIGF interface". 24 October 2012. Available at:

capacity between GRTgaz's North zone, GRTgaz's South zone, TIGF's zone and Spain as from 1 April 2014<sup>iError! Marcador no definido.</sup> and (4) the public consultation on conditions for access to gas transmission networks for gas intensive consumers.<sup>3</sup>

6. If these mechanisms imply granting a special treatment to some users (those having booked capacity at certain points or with a particular customer portfolio) in terms of allocation rights or tariffs, they could be discriminatory towards other users that would be confronted to limitations of capacity and/or higher prices. Moreover, they would not be consistent with the underlining principles of the NC on CAM.
7. It must be noted that the list of IPs for the expected or possible application of the CAM NC, recently published by ENTSOG, also includes the North-South link of GRTgaz.<sup>4</sup> This document has been delivered by ENTSOG on request by ACER and the EC.

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<http://www.cre.fr/documents/consultations-publiques/commercialisation-des-capacites-de-transport-a-la-liaison-entre-les-zones-nord-et-sud-de-grtgaz/consulter-la-note-technique>

<sup>3</sup> CRE, "Public Consultation by the Energy Regulatory Commission on conditions for access to gas transmission networks for gas intensive consumers". 29 July 2013. Available at:

<http://www.cre.fr/en/documents/public-consultations/conditions-for-access-to-gas-transmission-networks-for-gas-intensive-consumers/download-consultation>

<sup>4</sup> ENTSOG, "List of Interconnection Points for the Expected or Possible Application of the Capacity Allocation Mechanism Network Code". 29 July 2013. Available at:

[http://www.entsog.eu/public/uploads/files/publications/CAM%20Network%20Code/2013/CAP368\\_13\\_0729\\_CAM%20NC%20IP%20list\\_ENTSOG.pdf](http://www.entsog.eu/public/uploads/files/publications/CAM%20Network%20Code/2013/CAP368_13_0729_CAM%20NC%20IP%20list_ENTSOG.pdf)