

Energy Regulatory Commission

15, Rue Pasquier -F-
75379 Paris Cedex 08- France
dr.cp7@cre.fr

Object: Public consultation No.2019-006 of 27 March 2019 relating to the structure of the next tariff for the use of natural gas transmission networks of GRTgaz and Terega.

General observation

Before starting to make observations regarding the public consultation, it is considered appropriated provide a short presentation of undersigned Company.

Enoi S.p.A. is an Italian, independent and privately-owned energy company founded in 2000 in Milan, operates in trading, wholesale and supply of natural gas and power at European level (in more than 10 countries).

For many years Enoi S.p.A. has ranked with top companies for gas import in Italy and in his history has traded 1,000+ TWh (gas & power) developed 35+ bln. € of revenues and done 300,000+ deal.

The undersigned Company appreciates the general principles included in the public consultation which is in line with Regulation (EU) 2017/460 establishing a network code on harmonized transmission tariff structures for gas ("Tariff Network Code").

Enoi S.p.A. believe that the application of Regulation's requirements will allow that all operators such as Enoi S.p.A. to operate an integrated, transparent, competitive gas market at European level. These objectives will make market more liquid avoided cross-subsidization between user categories.

Therefore Enoi S.p.A. believes that to set transparency and non-discrimination criteria for calculating of gas transmission tariffs, the measures will take into account by the principles of simplicity, readability, predictability and continuity

Detailed observations

In view of above, the undersigned Company consider appropriate to make specific comments on points 2.1.7 (Question 12) and 2.3 (Question 23).


Answer to question 12 (Capacity transfer)

It believes that the modality proposed by GRTgaz represents a new opportunity for shippers which have bought the capacity of transferring capacity to the Virtual PIR (for example exchange capacity between entry point Virtualys with exit point Oltingue).

By the undersigned Company this proposal does not compromise the security of supply, but rather increase the liquidity and give the possibility to control the price at the PEG for the benefit of end customers. This measure will also increase the correlation with west European markets.

Answer to question 23 (Storage compensation)

Regarding an extension of the scope of storage compensation to customers connected to the transmission network envisaged only an interruption mechanism enabling partial or full exemption from storage compensation, the undersigned Company individuals one crucial aspect: this forecast damages shipper because it is impossible to able to pass this cost to customers. Therefore, the undersigned Company believes that this measure should not take place.


ENOI S.p.A.
Sede leg. Piazza E. Duse, 2 - Milano
Sede op. Corso Europa, 2 - Milano
Partita IVA 13107250154