

Bonjour,

Une participation à la consultation Consultation publique n°2019-006 du 27 mars 2019 relative à la structure du prochain tarif d'utilisation des réseaux de transport de gaz naturel de GRTgaz et TEREGA a été soumise.

Veuillez prendre connaissance des informations ci-après :

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- Visibilité : La réponse pourra être publiée par la CRE
- Contribution : Question 6. Are you in favour of globally maintaining the current entry/exit distribution method?

No.

It is highly recommended to apply the entry/exit distribution proposed by the TAR NC (50/50). CRE proposed an entry/exit split which penalizes the exits in favour of the entries without giving any reasonable argument for this decision. Besides, the penalization to the exit tariffs will be increased with CRE's proposal to reallocate to exit points a significant part of the cost of the termination of long-term contracts in entry points.

Thus, SEDIGAS considers that the proposal should be reviewed.

Question 7. Are you in favour of the pricing principles envisaged by CRE for the main network?

No.

SEDIGAS doesn't support the distinction made for the calculation of distances. It is discriminatory to apply to Pirineos and Oltingue the longest distance (from Dunkerque) (1,072km) and for domestic users the shortest (280 km). Differentiating between transit and domestic users in France is misleading taking into account that there are not any dedicated transit pipelines.

A target flow model for the entire system has not been developed, in line with TAR NC requirements, which should result in similar pricing for nearby points.

CRE should also provide the comparison between the application of the proposed tariff methodology and the counterfactual Capacity Weighted Distance methodology, as required by the TAR NC. In the latter case the result would reflect an objective flow model for the whole system, showing the real mix that arrives to Pirineos and Oltingue, which might not be only or even principally from Dunkerque. CRE is obliged to publish the flow scenarios according to TAR NC.

Cordialement,

La Commission de Régulation de l'Energie