

CRE consultation on the evolution of GRTgaz and TIGF network tariffs



EFET response – 16 September 2016

The European Federation of Energy Traders (EFET) thanks CRE for the opportunity to provide its views on the proposal to amend the regulated tariffs for the GRTgaz and TIGF networks (ATRT6). We very much appreciate that CRE has seen fit, once again, to translate this lengthy consultation into English. This helps our non-French members understand what is being proposed and anticipate possible tariff changes, enhancing the transparency and trust surrounding what is a key driver of trading decisions. CRE's best-practice approach to consultation (across all areas of market development) should serve as an example to other European regulators of the importance of open and effective translation.

EFET has answered the March 2016 consultation of CRE on the subject¹, and believes that the CRE proposals in the current consultation document generally fit the EFET standards. Therefore, you will find below a summary response to the consultation, based on our statements of March 2016.

On the timing for network tariffs changes

At first glance, it seems logical to align the timing of the network tariffs setting on the provisions of the CAM network code, and thereby changing the start of the tariff year to 1 October. Maintaining the tariff year starting 1 April seems to add unnecessary complexity and a departure of the French methodology from the European orientations.

¹ For more information, see the EFET response to CRE consultation on regulated network and LNG terminal tariffs, available at:

http://www.efet.org/Cms_Data/Contents/EFET/Folders/Documents/EnergyMarkets/GasPosPprs/2005Today/~contents/4Z42SQWAJTSNENET/EFET_CRE-consultation-ATRT6_ATTM5.pdf.

On the allocation of the costs of creating a single marketplace

EFET is increasingly of the view² that a pan-European approach to transmission tariff setting is necessary which, amongst other things, addresses the impact of market mergers and facilitates greater flows between market areas. Such an approach envisages “missing money” resulting from market mergers and the possible removal of tariffs at interconnection points being recovered consistently at categories of entry/exit points and equitably between the affected TSOs. We are keen to encourage a wider discussion at EU and national level on this issue.

On capacity subscription

EFET welcomes the initiatives taken by GRTgaz and supported by the CRE to “debottleneck” the asymmetric capacity subscription issue, to increase its flexibility and decrease capacity curtailments during periods of maintenance etc. In some of these initiatives short products (day ahead, intraday) are not included. EFET favours solutions allowing the inclusion of short-term products.

On LNG tariffs

We consider that innovative products and services should develop freely. It is important that the ATTM5 tariffs ensure a level-playing field between transportation network users and LNG terminal users. The market should be the primary driver for market participants to choose using a specific source of gas or another, not misaligned network and LNG terminal use tariffs.

² See EFET discussion paper titled “Developing a sustainable pan-EU approach to transmission charging” submitted to the 28th Madrid Gas Regulatory Forum in October 2015, available at: <https://ec.europa.eu/energy/en/madrid-forum-previous-meetings>.