



Konzultační formulář

Consultation form

Konzultační dokument podle Článku 26 Nařízení Komise (EU) 2017/460 ze dne 16. března 2017, kterým se zavádí kodex sítě harmonizovaných struktur přepravních sazeb pro zemní plyn

Consultation Document in accordance with Article 26 of Commission Regulation (EU) 2017/460 of 16 March 2017 establishing a network code on harmonised transmission tariff structures for gas

Dotčený subjekt

Interested party

<input type="checkbox"/>	Regulační orgán Regulatory authority	<input type="checkbox"/>	Provozovatel distribuční soustavy Distribution system operator
<input type="checkbox"/>	Ministerstvo nebo vládní organizace Ministry and governmental institution	<input type="checkbox"/>	Provozovatel zásobníku plynu Storage system operator
<input type="checkbox"/>	Místní samospráva Municipality	<input checked="" type="checkbox"/>	Dodavatel plynu, obchodník Gas Supplier, Trader
<input type="checkbox"/>	Akademická sféra Academia	<input type="checkbox"/>	Zákazník Customer
<input type="checkbox"/>	Provozovatel přepravní soustavy Transmission system operator	<input type="checkbox"/>	Jiný Other

příslušné zařazení prosím označte X

please mark with X

Identifikace

Identification

Jméno právnické osoby Name of legal person	E.ON Energie, a.s.
Jméno a příjmení odesílatele Name and surname of the sender	
E-mailová adresa E-mail address	
Telefonní číslo Telephone number	
Datum Date	

Připomínky a podněty (v případě potřeby prosím přidejte další řádky)

Comments/initiatives (please add rows as needed)

Kapitola Chapter	Připomínky a podněty Comments and initiatives
19.1.2	<p>Our response concerns the dramatic increase in the tariff for capacity booking at exit from storage facilities. We consider that this dramatic increase will have a number of negative impacts on the gas market. The price hike jeopardises the functions of storage facilities as the key tool for market liquidity, for covering seasonal swings in demand, and, primarily, for supply security.</p> <p>For traders this will also have a very negative impact on the profitability of gas supply to their final customers, since a number of multiannual contracts for gas supply to final customers, with the price fixed, are currently in place and the increase in the transmission capacity tariff poses a great risk to the profitability of these supplies.</p> <p>Negative impacts also concern the traders who have booked storage capacity for 2020 and beyond with SSOs; in respect of participation in storage capacity auctions, the price of the storage facility entry/exit transmission is one of the parameters based on which these traders decide whether to join the auction and the volume they will bid for.</p> <p>This price hike will also adversely influence the traders who provide for their supply security standard (BSD) using physical gas storage, including for many years ahead, and do not provide for their BSD through transfer to a different trader. In the event of unusual situations (such as emergencies) it will be these traders whose stored gas will be used by the whole network, i.e. also the protected customers of the traders who have transferred their BSD obligation to a different entity.</p> <p>Over the long term, this price hike will have to be passed through to prices for final customers, causing an unnecessary loss of competitiveness of gas vis-à-vis other fuels.</p> <p>We therefore suggest using the option of increasing the discount for storage facility entry/exit transmission tariffs under Article 9(1) TAR NC from the proposed 50% up to 100%.</p>