The European Federation of Energy Traders (EFET)\(^1\) welcomes the opportunity to provide comments to the consultation document n. 544/2019 on the incentive scheme to be applied to SNAM Rete Gas in the context of the balancing regime.

We appreciated ARERA’s detailed analysis on SNAM performances during the last regulatory period. We welcome the intention of including the quantitative savings for the whole gas system generated by SNAM’s performance in the next assessment (as stated in paragraphs 8.6 and 8.7 of the consultation).

We still believe that ARERA should design a symmetrical reward/penalty scheme and implement the same philosophy for penalties: if no cap for rewards is established, the floor for potential penalties should also be removed.

Two ways can be explored:

1. Improve SNAM’s performances
2. Reduce the incentives cap

Below you will find our detailed comments.

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\(^{1}\) The European Federation of Energy Traders (EFET) promotes and facilitates European energy trading in open, transparent and liquid wholesale markets, unhindered by national borders or other undue obstacles. EFET currently represents more than 100 energy trading companies, active in over 27 European countries. For more information: [www.efet.org](http://www.efet.org)
S4: Si ritengono condivisibili gli obiettivi sottesi ai nuovi indicatori di performance p4 e p5?

We believe that for p4 and p5 we need more transparency, in fact traders do not have all the information to be able to assess the congruity of the threshold value proposed in the consultation.

In this regard, we require that SNAM publishes all the terms, with separate evidence, that make up the PSI both in the forecast and in the final balance. It would be appropriate that all the interventions carried out by SNAM as TSO in the market become recognisable by all users, including in the continuous trading.

Because the gas system will be considered in the performance indicator p4, it would be appropriate to exclude it from the calculation of the indicator p1 (therefore modifying article 9.2 of the TIB). Demand forecast should be, as in the past, net of gas for the systems. Otherwise, such volumes would be considered in two indicators that might not be interesting for trades because they are supplied by SNAM.

We believe that the two auctions, which are held one on day G-1 and one on day G, should be enough for the supply of all the necessary quantities.

S6: Se ne condivide la formalizzazione in termini di I4 e I5?

S7: Si ritiene appropriata la durata del 4PI?

We agree with the ARERA’s proposal regarding the duration of I1, I2 e I3 and the revision of I4 and I5 after a year.