

ARERA consultation n. 557/2018 on the redefinition of the TIWACC for gas and electricity infrastructures



EFET response – 28 November 2018

The European Federation of Energy Traders (EFET¹) welcomes the opportunity to respond to ARERA consultation n. 557/2018 on the redefinition of the TIWACC for the gas and electricity infrastructures for the period 2019-2021.

Though much of the content and scope of this consultation falls outside our traditional areas of interest, we still would like to make few points relevant for the setting of gas tariffs for post-2020 and for the definition of tariffs for 2019 and their predictability.

First, we expect ARERA to provide an update and republish the expected tariffs for post-2020 calculated with the new methodology -currently be consulted upon as part of DCO 512/2017- by taking into account the proposed redefinition of the WACC parameters.

Second, we would like to make sure that no change foreseen by the redefinition of the WACC for gas infrastructure is impacting the tariff levels for the year 2019. This is also what art. 29 of the TAR NC foresees, namely that tariffs published prior to the yearly capacity allocation are binding until at least the end of the gas year. We understand that art. 2 of Delibera 280/2018 established that the allowed revenues for transport activities for the year 2019 will be defined in a definitive manner only once allowed revenues for the year 2020 are defined taking into account both the 2018 regulatory under-recovery and the updated parameters as per 5 and 6 of the TIWACC for the year 2019. However, the DCO 557/2018 contains misleading wording in para 3.1. Therefore, reassurance about the fact that transportation tariffs published in May 2018 will not change on January 1st 2029 would be very welcome.

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