

ARERA consultation document n. 155/2018 on an incentive scheme to be applied to gas storage operators



EFET response – 20 April 2018

The European Federation of Energy Traders (EFET¹) welcomes the opportunity to comment on ARERA's consultation n.155/2018/gas on an incentive mechanism to be applied to storage operators.

EFET has for long been a promoter of a reform of the Italian storage service and, in particular, of a deep reform of the storage products offered, to harmonise Italian storage with what is offered in other EU Member States.

We welcomed the introduction, this year, of new storage products, even though we believe that the introduction of said products should have been carried out in a longer timeframe, carefully considering IT feasibility and consulting traders and shippers in the process.

Furthermore, considering that current regulatory framework already foresees for storage operators to allocate maximum availability and flexibility to their users, we would like to propose that ARERA:

- avoids setting 'free' incentives to promote services that should be considered as normal practice;
- implements a symmetrical incentive/penalty scheme to be applied to storage operators, rather than a simple incentive scheme; and,
- pays more attention to investment into the storage infrastructure, since, from the results of the last '*Istruttoria*', it emerged that storage fields' performances are deteriorating, and this can lead to an even more problematic overall reduction of their performance.

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