

## **AEEGSI consultation document n. 321/2016 on gas transportation tariffs for the period 2010-2013**

### **EFET comments - 15 July 2016**

The European Federation of Energy Traders (EFET<sup>1</sup>) welcomes the opportunity to comment on the AEEGSI consultation document n. 321/2016 on the review procedure of gas transportation tariffs for the period 2010-2013.

In response to the previous consultation<sup>2</sup>, we underlined that the Regulator should avoid triggering a vicious circle of appeals, rulings, counter-appeals that could occur both in case of non-compliance with the judgment and in case of retro-active compensation mechanisms. Furthermore, we highlighted that unexpected and retroactive changes to the tariff levels should be avoided not to hinder the predictability of the Italian gas market rules; as a solution to comply with the State Council ruling n. 2888/2015 and in opposition to the proposed retroactive introduction of a specific charge (CVfuel), we suggested the introduction of a dedicated forward-looking coefficient to be charged on shippers in the future and starting from the next gas year.

AEEGSI is now still proposing, although on a voluntary basis, the retroactive introduction of a specific charge (CVfuel) applicable for the calendar years 2010, 2011, 2012 and 2013 in order to reflect the distance between each point and the focal point ('*baricentro del mercato*').

Although the solution proposed by AEEGSI does not have the form that we had suggested, as we understand it the content of the measure seems to allow maintaining shippers' financial accounts retrospectively unaffected, thanks to a voluntary basis mechanism. Provided that this approach is confirmed and no legal, operational or accounting complexity emerges, EFET therefore supports the content of the measure.

Finally, we stress that, should this process trigger any need to recover additional financial resources through the adaptation of system charges (i.e. *componenti tariffarie destinate alla copertura degli oneri generali*), AEEGSI should provide transparency of

<sup>1</sup> 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)

<sup>2</sup> [EFET response to AEEGSI consultation document n.607/2015](#), 19 January 2016

such amounts and continue to update such components with a lead time of at least half-year.