

ACM
Muzenstraat 41
2511 WB The Hague
The Netherlands

18 December 2023

Subject: EFET remark on the application of storage discounts under the consulted tariff methodology

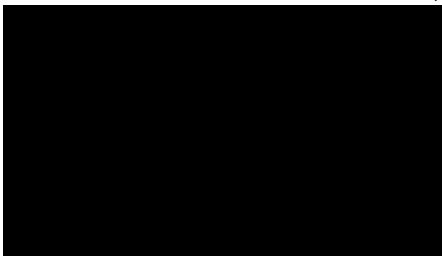
The European Federation of Energy Traders (EFET) would like to point out the inconsistency in the way the storage discount is set to be applied under the agreed tariff methodology. We would like to stress upfront that we refrain from commenting on other aspects of the methodology, due to diverging views between our Members.

In our understanding, the proposed storage discount is not to apply to facilities connected to two market areas, as they can be used to compete with the interconnection point. In our view, this is an unnecessary oversimplification that acts to the detriment of shippers using such storage facilities exclusively in the TTF market area. We note that since the storage operator already holds separate accounts for the two market areas, there should be no issue with applying the discount on the capacity used for storing purposes in the Netherlands. In practice, a level-playing field can be established for all storage facilities, whereby the tariff charge is refunded for capacities that are not used for gas transmission between market areas. Such approach has already been established e.g. in Austria.

If ACM decides to apply a storage discount, then, this discount should be granted for any transport capacity used to store volumes that remain inside the TTF market area. The information on the way storage capacity is used is readily available, making such adjustment easily implementable at no extra cost.

Kind Regards,

On behalf of EFET TF BeNeLux,



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