

## Energy Traders Europe response to the revised Gas System Charges Ordinance

In reaction to the recently published updated draft ordinance on system charges, Energy Traders Europe would like to point to the significance of the tariff increase, both when compared to the 2025 levels and to levels initially posted for 2026 on 17<sup>th</sup> April. We find it difficult to understand how the calculation results can be so far from each other and fundamentally different from the forecasts presented last year. Regardless of the underlying reason, **we stress that a tariff increase rate at a level reaching 100% per year is unsustainable and unbearable by the network users.** We also see this as a striking example how the lack of transparency regarding the state of play of TSO revenues leads to such unexpected significant increases of gas transport tariffs. We encourage E-Control to increase the level of transparency.

Considering the magnitude and suddenness of the change, one can only assume that substantial revenue gap was identified at TSO end at some point. Even if this is the case, we do not believe it is justified to simply transfer the entire additional cost onto the remaining network users. Such tariff increase poses a particularly severe challenge to existing capacity holders. With a tariff increase of this magnitude for the second year in a row, we note that the **reshuffling service will likely be of little help, as capacity products in Austria will lose competitiveness** in all directions. We also stress that, given the unreliability of the past forecasts and no cap on year-over-year tariff changes, no shipper will risk booking any capacities in Austria in the long-term. A thorough impact assessment and the definition of effective mitigation strategies are urgently needed.

We conclude by urging E-Control and the authorities in Austria to seek alternative ways to cover for the revenue gap that, in our understanding, is now being simply reintroduced in the tariff calculation. Other ways should also be evaluated to recover such additional costs to mitigate tariff impacts, e.g. spreading the amount to be recovered over several years. A change of system charges of this magnitude will have a significant and lasting impact on Austrian network utilization and will heavily affect gas consumers in Austria and beyond.

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