

Agency for Cooperation of Energy Regulators (ACER)

Consultation2012E15@acer.europa.eu

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## ITC / Public Consultation 2012

Dear Ladies and Gentlemen!

The ITC (Inter TSO Compensation) mechanism was established to recover the costs which are generated through cross border flows. This means that there must be sufficient revenues to compensate the occurring costs for countries such as Austria which have to bear these flows.

However, the current size of the ITC fund with 100 Mill Euro per year does not cover the actual costs of cross border flows for the Austrian TSO (APG). As a consequence Austrian consumers have to pay higher net tariffs to compensate for the difference. This leads to an illicit burden and market distortion for Austrian Industry which is unacceptable to the Federation of Austrian Industries.

The outcome of the assessment of the annual cross-border infrastructure compensation also underlines that in the majority of the scenarios the ITC fund size is not sufficient to cover the occurring costs.

**The Federation of Austrian Industries therefore asks for sufficient funding to fully cover the costs and a fair compensation between the TSO. The ITC Fund must be able to fully cover the costs of the existing network for cross-border flows and the existing assets must be the basis for calculations.**

Concerning the detailed questions of the public consultation the Federation of Austrian Industries fully supports the position of the Austrian Power Grid (APG) and refers to the APG's comments.

Best regards  
Federation of Austrian Industry

Peter Koren eh  
Deputy Director General