

Our date  
2012-10-19

Our reference

Administrative officer  
Davide Rubini

Your date

Your reference

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## **Statoil response to the ACER questionnaire on the Draft Framework Guidelines on Harmonised Tariff Structures**

Dear Sir or Madam,

Statoil appreciates the opportunity to answer your questionnaire on the Draft Framework Guidelines on Harmonised transmission tariff structures.

Overall, Statoil views the Draft Framework Guidelines as a positive contribution to the process leading to the formulation of EU Network Codes.

We welcome in particular ACER's focus on the need to strike a balance between facilitating short-term gas trading and promoting cost-recovery and providing long-term signals for efficient investment, correctly mentioned as the guiding principle of the Draft Framework Guidelines. Some elements in the Draft Framework Guidelines, however, appear to disproportionately favour short-term trading, potentially generating cross-subsidies among users and increasing the likelihood of under-recovery and distortion of investment signals. Please see our views on specific items throughout the questionnaire.

Please contact Davide Rubini or Andrea Bonzanni ([ng\\_gra@statoil.com](mailto:ng_gra@statoil.com)) should you require any clarification or comment regarding our answers.

Kind regards,

Olav Aamlid Syversen  
Head of Gas Regulatory Affairs  
Natural Gas  
Statoil ASA

***Electronic non-signed version***