

# ACER Consultation Template

Fields marked with \* are mandatory.

## Introduction

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The Agency for the Cooperation of Energy Regulators ('the Agency') has developed an online template following Article 26(5) of the Commission Regulation (EU) 2017/460 of 16 March 2017 establishing a Network Code on Harmonised Transmission Tariff Structures for Gas ('TAR NC'). The online template has been designed for the NRA/TSO responsible for carrying out the consultation on the reference price methodology to provide a summary of the consultation.

The online template and the tool for the submission of files to the Agency is implemented over a secure IT connection based on https.

Instructions for using the online template and for the submission of the consultation documents are on the appendix, at the end of the online template. For addition information on the online template, visit: [http://www.acer.europa.eu/Official\\_documents/Public\\_consultations/Pages/ACER-Consultation-Template.-Tariff-NC-Article-26\(5\).aspx](http://www.acer.europa.eu/Official_documents/Public_consultations/Pages/ACER-Consultation-Template.-Tariff-NC-Article-26(5).aspx)

## General information on the consultation on the RPM

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\* Member state

Italy

Organisation responsible for the consultation on the RPM.

ARERA

Contact point in the NRA/TSO responsible for the consultation.

██████████@arera.it

Timeline for the final consultation: launch and closing dates.

18 October 2022 - 19 December 2022

Will there be any intermediate consultations prior to the final consultation? If so, what topics will they cover? The last section of the survey allows the NRA/TSO providing information on this part of the process.

Are any intermediate consultations planned/expected prior to the final consultation on the RPM?

- Yes
- To be decided
- No

## **A. Proposed reference price methodology [Article 26 (1)(a)]**

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### **A.1. Information on the parameters used in the proposed RPM related to technical characteristics of the transmission system [Articles 26(1)(a)(i), 30.(1)(a)].**

Provide the information on the parameters listed in Article 30(1)(a)(i-v) when they are an input to the proposed RPM . For parameters that are not an input to the RPM, mark as 'Not applicable'.

The description of the RPM and the justification of the parameters may refer to information requested in other points of Article 26 and in other articles, such as Article 7.

#### **A.1.A. Description of the proposed reference price methodology [Article 26(1)(a)].**

The following description is intended to provide an overview of the RPM. Include a reference to, at least, the following elements. Only refer to these items if they are applicable to the RPM:

- Choice of RPM
- Cost drivers of the RPM
- Locational signals in E/E points resulting of the RPM (e.g.: capacity, distance). Locational signals are price levels that send incentives to network users in order for the network operators to achieve an efficient operation and/or expansion of the gas system.
- Entry/exit split. Cost reflectivity and application to the RPM.
- Capacity/commodity split. Cost reflectivity and application to the RPM.
- Intra-system/cross-system split. Cost reflectivity and application to the RPM.
- Adjustments (benchmarking, equalisation and rescaling).
- Use of inter-TSO compensation mechanism. Brief note on the application of the RPM in multi-TSO E /E system and reference to the inter-TSO compensation mechanism consultation.

Indicate the choice of RPM (e.g.: postage stamp, capacity weighted distance, virtual point, matrix, or other)

The proposed reference price methodology (RPM) is the capacity weighted distance (CWD), with the following cost drivers: average distance for each entry point/cluster of entry point and for each exit point /cluster of exit points; forecasted contracted capacity (§18).

Provide description.

- Locational signals resulting from the CWD reflect the relative distance between each entry/exit point and an average location, weighted by the forecasted booked capacity; in principle, the farthest the distance, the highest the charge. ARERA deems that the proposed methodology guarantees a high degree of cost reflectivity.
- Entry/exit split is 25/75.
- Capacity/commodity split for 2024 is estimated to be 64/36. The capacity share covers mainly capital costs (asset remuneration and depreciation), which are fixed costs. The commodity share covers operating costs, losses, fuel gas and unaccounted for gas, which are mainly variable costs (§16).
- The intra-system/cross-system split for capacity charges is 96/4.
- For the purpose of CWD calculations, grouping of entry points from production facilities (into 10 production hubs) and of domestic exit points (into 12 exit areas) is performed (§18.4).
- The following adjustments are proposed: Equalisation, whereby the same reference price is applied to the following groups of points: entry points from storage; exit points to storage, domestic exits within 15 km from the national network, domestic exits over 15 km from the national network (§18.7-18.7). Rescaling for reference prices resulting from the CWD RPM after storage discounts, by multiplying entries and exits for the respective constant. This operation is performed to guarantee the recovery of the allowed revenue with respect to forecasted contracted capacity (§18.12-18.13). No benchmarking is applied.
- 50% discount for storage, no discount for LNG (§18.8-18.11)
- A discount of 50% is proposed for the future exit point in Gela, which will connect Malta to the Italian gas system.
- Since the Italian system is characterised by the same entry charge and exit charge for multiple TSOs, an inter-TSO compensation mechanism is in place, in order to ensure to each TSO a revenue consistent with its allowed costs (§21).

Reference to consultation document(s). Provide document ID and relevant page(s).

Chapter 16 (capacity-commodity split), 17 (entry-exit split), 18 (reference price methodology) and 21 (inter-TSO compensation)

### A.1.B. Justification of the parameters and how they are used in the RPM [Articles 26(1)(a)(i), 30(1)(a)(i-v)].

Justify the selection and use of the parameters listed in Article 30(1)(a)(i-v) that are and input to the RPM, in view of the level of complexity of the transmission network related to the technical characteristics of the transmission system.

Reference to consultation document(s). Provide document ID and relevant page(s).

- Capacity cost driver: forecasted contracted capacity in a calendar year, determined as weighted average of the forecasted contracted capacity for the two gas years relevant for the calendar year. This estimation includes also short-term capacity and interruptible capacity.
- Distance cost driver: given the peculiarities of the Italian system, characterised by two classes of transmission services, on national and regional networks, distance is calculated according to the following criteria: for the national network, the physical distance on the shortest route from one entry/cluster of entry point to one exit/cluster of exit point; for the regional network, the average distance from the national network of delivery points belonging to an exit area, weighted by the forecasted contracted capacity in those same delivery points.

Reference to consultation document(s). §18-2-18.3

### A.1.C. Technical capacity at entry and exit points: values and associated assumptions [Articles 26(1)(a)(i), 30(1)(a)(i)].

Is the parameter an input to the RPM?

- Yes  
 No

### A.1.D. Forecasted contracted capacity at entry and exit points: values and associated assumptions [Articles 26(1)(a)(i), 30(1)(a)(ii)].

Is the parameter an input to the RPM?

- Yes  
 No

Values of the forecasted contracted capacity at entry and exit points. Reference to consultation document(s). Provide document ID and relevant page(s).

Reference to consultation document(s). Annex, Table 1

Associated assumptions for the values of the forecasted contracted capacity at entry and exit points. Reference to consultation document(s). Provide document ID and relevant page(s).

Capacity is based on a forecast by the TSOs on gas years 2023-24 and 2024-25. It also includes: (i) a forecast on short-term bookings, given the respective level of multiplier; (ii) a forecast on interruptible capacity, given the respective level of discount.

For each tariff year, assumptions and data on forecasted capacity are provided by the TSOs and subject to approval by ARERA.

Reference to consultation document(s): §18.2

### A.1.E. The quantity and the direction of the gas flow for entry and exit points: values and associated assumptions [Articles 26(1)(a)(i), 30(1)(a)(iii)].

Is the parameter an input to the RPM?

- Yes  
 No

#### A.1.F. Structural representation of the transmission network with an appropriate level of detail and associated assumptions [Articles 26(1)(a)(i), 30(1)(a)(iv)].

The representation should include an image of a simplified network depicting the transmission network and distinguishing the elements defined in Article 2(1)(1) of the Regulation (EC) No. 715/2009:

- High-pressure pipelines (other than the upstream pipeline network and other than high-pressure pipelines primarily used in the context of local distribution of natural gas, with a view to its delivery).
- Transmission networks which are dedicated to supplying domestic customers.
- TSO-DSO interface (transmission exit points to DSO).

The representation should include the transmission network elements included in the regulatory asset base.

Reference to consultation document(s). Provide document ID and relevant page(s).

Annex, Figure 1 and 2

Associated assumptions and criteria used for the structural representations (e.g.: clustering, average distances, etc). Provide reference to consultation document(s):

#### A.1.G. Additional technical information and associated assumptions about the transmission network such as the length of pipelines, the diameter of pipelines and the power of compressor stations [Articles 26(1)(a)(i), 30(1)(a)(v)].

Are there other parameters used as input to the RPM related to technical characteristics of the transmission system? Provide pipeline pressure levels if available.

- Yes  
 No

### A.2. The value of the proposed adjustments for capacity-based transmission tariffs pursuant to Article 9 [Article 26(1)(a)(ii)]

#### A.2.A. Proposed discount(s) at entry points from and exit points to storage facilities [Articles 26(1)(a)(ii), 9(1)].

Do you apply the discount(s) at entry points from and/or exit points to storage facilities?

- Yes  
 No

Indicate discount (%) at entry points from storage facilities compared to the initial result of the RPM.

50

Indicate discount (%) at exit points to storage facilities compared to the initial result of the RPM.

50

Other file or reference (e.g. different discounts for different products at the same storage facilities).

Are there storage facilities connected to more than one transmission or distribution network system.

- Yes  
 No

### A.2.B. Proposed discount(s) at entry points from LNG facilities [Articles 26(1)(a)(ii), 9(2)].

Do you apply the discount(s) at entry points from LNG facilities?

- Yes  
 No

### A.2.C. Proposed discount(s) at entry points from and exit points to infrastructure developed with the purpose of ending the isolation of Member States [Articles 26(1)(a)(ii), 9(2)].

Do you apply discount(s) at entry points from and exit points to infrastructure developed with the purpose of ending the isolation of Member States?

- Yes  
 No

Indicate discount (%) at entry points from to infrastructure developed with the purpose of ending the isolation of Member States compared to the initial result of the RPM.

Indicate discount (%) at exit points from to infrastructure developed with the purpose of ending the isolation of Member States compared to the initial result of the RPM.

50

Reference to consultation document(s). Provide document ID and relevant page(s).

§18.14-18.16

### A.3. Indicative reference prices subject to consultation [Article 26(1)(a)(iii)]

### A.3.A. Indicative reference prices at each entry and at each exit point [Article 26(1)(a)(iii)].

Reference to consultation document(s). Provide document ID and relevant page(s).

Annex, Table 5

## A.4. Cost allocation assessment [Articles 26(1)(a)(iv), 5]

According to Article 27(2)(b) the Agency shall assess the compliance of Article 7. Given that Article 7(c) refers to the cost allocation assessment, the Agency's analysis of compliance applies to the cost allocation assessment. For this purpose, the Agency request the NRA/TSO responsible for the consultation to submit a justification of the cost allocation assessment together with the rest of the consultation documentation once the consultation is launched. This only applies for the case when the cost allocation ratio exceeds 10%. This justification is requested by the Agency independently of its inclusion in the NRA motivated decision described in Article 27(4). For the submission of documents relevant to this section, see the upload section at the end of this template.

### A.4.A. Results of the capacity cost allocation assessment [Articles 26(1)(a)(iv), 5].

Capacity cost allocation comparison index (%)

3.8

### A.4.B. Components of the capacity cost allocation assessment [Articles 26(1)(a)(iv), 5].

Reference to consultation document(s). Provide document ID and relevant page(s).

Annex, Table 7

### A.4.C. Details of components of the capacity cost allocation assessment [Articles 26(1)(a)(iv), 5].

Description of the calculation, including:

- Details of the cost drivers following Article 5(1)(a).
- Rationale for the combination of capacity cost drivers.
- Where the result of the capacity cost comparison index exceeds 10%, provide the justification for such results.

Reference to consultation document(s). Provide document ID and relevant page(s).

Capacity cost driver: forecasted contracted capacity, distance. Annex, Table 7

### A.4.A. Results of the commodity cost allocation assessment [Articles 26(1)(a)(iv), 5].

Commodity cost allocation comparison index (%).

0

#### A.4.B. Components of the commodity cost allocation assessment [Articles 26(1)(a)(iv), 5].

Reference to consultation document(s). Provide document ID and relevant page(s).

Annex, Table 7

#### A.4.C. Details of components of the commodity cost allocation assessment [Articles 26(1)(a)(iv), 5].

Description of the calculation, including:

- Details of the cost drivers following Article 5(1)(a).
- Rationale for the combination of commodity cost drivers.
- Where the result of the commodity cost comparison index exceeds 10%, provide the justification for such results.

Reference to consultation document(s). Provide document ID and relevant page(s).

Commodity cost driver: withdrawn volume of gas. Annex, Table 7

### **A.5. Assessment of the proposed reference price methodology in accordance to Article 7 and Article 13 of the Regulation (EC) No. 715/2009 [Article 26(1)(a)(v)]**

The Agency will evaluate the compliance of the RPM against the set of principles laid out in Article 7 [Article 27(2)(b)(1)]. For the purpose of making explicit the criteria that will be used for this analysis, the template provides the following non-exhaustive list of suggestions to follow in the assessment.

Quantitative analysis and stakeholder support will be taken by the Agency as evidence. When such proofs are not available, compliance will be reviewed based on the explanations provided.

#### A.5.A. The RPM should: enable network users to reproduce the calculation of reference prices and their accurate forecast.

The description of the RPM, together with the rest of elements listed in this template should be instrumental to allow replicating the calculation of reference prices. Provide the manner and the order in which these elements are used for the calculation of the RPM.

Reference to consultation document(s). Provide document ID and relevant page(s).



The proposed RPM is sufficiently clear and transparent, as it is mainly based on the CWD methodology described in the TAR NC, with adjustments as previously described in sections 1A and 1B.  
Provide the reference to the consultation document(s): § 18.22-18.24

#### **A.5.B. The RPM shall into account the actual costs incurred for the provision of transmission services considering the level of complexity of the transmission network.**

Evaluate the cost reflectivity of the RPM related to the level of complexity and the technical characteristics of the transmission network. The assessment can be based on elements such as:

- How do the level of complexity and the technical characteristics of the transmission network influence the choice of RPM?
- Is the use or non-use of locational signals related to the level of complexity and the technical characteristics of the transmission network?
- How does the choice of E/E split affect the cost reflectivity of reference prices?
- How do reference prices at E/E points relate to the underlying costs of the network?
- Indicate any other elements of the RPM relevant to assess the cost reflectivity of the RPM

Reference to consultation document(s). Provide document ID and relevant page(s).

The CWD methodology ensures a high degree of cost-reflectivity, as it is based on both the cost drivers of capacity and distance.  
For the purpose of CWD calculation, grouping of entry points from production facilities and domestic exit points is a necessary step given the complexity of the network.  
The 25/75 E/E split is in substantially line with previous regulatory decisions.  
Provide the reference to the consultation document(s): § 18.22-18.24

#### **A.5.C. The RPM shall ensure non-discrimination and shall prevent undue cross-subsidisation including by taking into account the cost allocation assessments set out in Article 5.**

Evidence for the assessment should take into account the cost allocation assessment, which checks the non-discrimination between two predefined groups of network users. Other means can be used to check non-discrimination between other groups of network users. Provide reference to consultation document(s). Provide document ID and relevant page(s).

The RPM does not create cross-subsidies among network users, as shown also by the results of the cost allocation assessments. As the methodology takes distance as a relevant cost driver, the degree of cross subsidisation is limited when compared to other methodologies which do not take distance into account – and which result in more homogenous sets of tariffs. Discounts for storage and LNG (respectively, 50% and zero) have been set at the lowest possible level in order to limit the extent of cross-subsidies. Concerning the equalisation of domestic exits (delivery points), though some degree of cross-subsidisation between final customers in different areas is resulting, it must be considered that it avoids outliers in the tariffs as a result of the CWD, which do not seem reasonable in terms of cost-reflectivity and are only related to the simplified approach implied in the CWD methodology. Also, it must be considered that such equalisation does not affect the outcome of the cost allocation assessment as it only operates on a group of points which are for intra-system use.

Provide the reference to the consultation document(s): § 18.22-18.24

#### A.5.D. The RPM shall ensure that significant volume risk related particularly to transports across an entry-exit system is not assigned to final customers within that entry-exit system.

Explain how the variation in transit flows affects reference prices for final consumers. The assessment can be based on elements such as:

- The contribution of the E/E split to the risk bared by final consumers.
- Are there any ex-ante splits of revenues for the purpose of intra-system and cross-system users?

Reference to consultation document(s). Provide document ID and relevant page(s).

With reference to the volume risk, the RPM guarantees an adequate stability and certainty of the tariff revenue. The volume risk for final customers within the Italian e/e system, related to the potential volatility of transit flows, is indeed very low as the volumes of natural gas for exports only represent a small share of the total volumes (lower than 5%). Therefore, changes in the volumes of transit would entail minimal relative variations in the tariff revenue.

Provide the reference to the consultation document(s): § 18.22-18.24

#### A.5.E. The RPM shall ensure that the resulting reference prices do not distort cross-border trade.

Refer at least to the effect of the E/E split on cross-border trade. Provide reference to consultation document(s). Provide document ID and relevant page(s).

On the principle of non-distortion of cross-border trade, it is important to note that the differences between charges at exit points are very limited, and that cross-border exit charges are broadly aligned with domestic exit charges. Such differences are simply the outcome of the CWD methodology. With reference to entry points, reducing the share of revenues to be recovered by entry charges further reduces, in absolute terms, the differences between charges at different entry points; this further reduces distortions in choosing the source of supply, and fosters market competitiveness.

Provide the reference to the consultation document(s): § 18.22-18.24

## **A.6. Comparison with the CWD methodology [Article 8] accompanied by the indicative reference prices subject to consultation set out in Article 26(1)(a) (iii)**

A.6.A. Where the proposed reference price methodology is other than the capacity weighted distance reference price methodology detailed in Article 8, a comparison between both methodologies should be performed [Articles 26(1)(a)(vi), 8].

The comparison should be performed with an appropriate level of detail and should enable stakeholders to identify the main differences, advantages and disadvantages of the compared methodologies. The following non-exhaustive list provides relevant elements that can guide the comparison:

- Differences, if any, in the input parameters for each of the methodologies such as input parameters (e.g.: technical and forecasted capacity), ratios for the allowed or target revenue listed in Article 30(1)(b)(v) and discounts to storage and LNG.
- Differences in the manner in which each of the methodologies reflect the level of complexity and the technical characteristics of the transmission network.
- Relation of each of the methodologies to the principles laid out in Article 7.
- Cost allocation assessment in Article 5.

Provide the same parameters and assumptions used for the CWD as for the proposed RPM, highlighting the differences, if any. When the parameters used for each of the methodologies are different, indicate and follow through the differences in reference prices.

Reference to consultation document(s). Provide document ID and relevant page(s).

See Annex, Table 5. The only difference between the CWD as described in Article 8 of the TAR NC and the proposed RPM is the E/E split. The effect at entry and exit points is symmetrical: the 50/50 would yield lower (-50%) reference prices at entry points and higher (+50%) reference prices at exit points.

**A.6.B. Comparison of indicative reference prices at each entry point and at each exit point of the proposed RPM and the CWD detailed in Article 8.**

Reference to consultation document(s). Provide document ID and relevant page(s).

Annex, Table 5 shows the difference between the proposed E/E split (25/75) and the E/E split detailed in Article 8 of the TAR NC (50/50). The E/E split is the only element which differs from the CWD methodology as described in Article 8.

## **B. Allowed or Target Revenue of the TSO [Article 26(1)(b)]**

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### **B.7. Indicative information set out in Article 30(1)(b)(i), (iv) and (v)**

**B.7.A. Allowed or target revenue, or both, of the transmission system operator [Articles 26(1)(b), 30(1)(b)(i)].**

- If allowed and target revenue are both used, provide detail for each case.
- In the case of multiple TSOs, indicate the approach adopted. In the case where the NRA is carrying out the consultation, provide the reference where the information on allowed or target revenue for each TSO can be found.
- Units: currency/year

Description.

Allowed revenue: 2,989 M€.  
Figures presented in this Section B are indicative for year 2024, at system level (all TSO).

Reference to consultation document(s). Provide document ID and relevant page(s).

Annex, Table 4

**B.7.B. Transmission services revenue [Articles 26(1)(b), 30(1)(b)(iv)].**

Description (Units: currency/year)

2,947 M€

Reference to consultation document(s). Provide document ID and relevant page(s).

Annex, Table 4

**B.7.C. Capacity-commodity split of the transmission services revenue.**

**Breakdown between the revenue from capacity-based transmission tariffs and the revenue from commodity-based transmission tariff [Articles 26(1)(b), 30(1)(b)(v)(1)].**

Revenue from recovered from capacity-based transmission tariffs, %:

64

Revenue from recovered from commodity-based transmission tariffs, %:

36

Reference to consultation document(s). Provide document ID and relevant page(s).

Annex, Table 4

#### B.7.D. Entry-exit split of the transmission services revenue.

Breakdown between the revenue from capacity-based transmission tariffs at all entry points and the revenue from capacity-based transmission tariffs at all exit points [Articles 26(1)(b), 30(1)(b)(v)(2)].

Revenue from capacity-based transmission tariffs at all entry points, %:

Revenue from capacity-based transmission tariffs at all exit points, %:

Reference to consultation document(s). Provide document ID and relevant page(s).

#### B.7.E. Intra-system/cross-border split of the transmission services revenue.

Breakdown between the revenue from domestic network users at both entry points and exit points and the revenue from cross-border network users at both entry points and exit points calculated as set out in Article 5, [Articles 26(1)(b), 30(1)(b)(v)(3)]

Revenue from domestic network users at entry points and exit points, %:

Revenue from cross-border network users at entry points and exit points, %:

Reference to consultation document(s). Provide document ID and relevant page(s).

## C. Information on commodity based and non-transmission tariffs [Article 26(1)(c)]

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Following Article 27(2), the Agency shall analyse the compliance of the criteria used for setting commodity-based tariffs as set out in Article 4(3), and of the criteria used for setting non-transmission tariffs as set out in Article 4(4). The analysis of compliance will be based on the terms listed in this section.

### C.8. Flow based charge. Information on commodity-based transmission tariffs referred to in Article 4(3) [Article 26(1)(c)(i)]

Do you apply a flow based charge?

- Yes  
 No

### C.8.A. The manner in which they are set [Articles 26(1)(c)(i)(1), 4(3)(a)].

Provide the following information:

- Description, rationale and extent to which the flow based charge is used.
- Formula with cost drivers for monetary terms / in kind.
- Reference used for the calculation (historical flows, forecasted flows or both).
- Confirm that the flow based charge is set in such a way that it is the same at all entry points and the same at all exit points.

Description:

ARERA proposes a single flow-based charge (CVU), levied for the purpose of covering operating costs (including fuel costs, unaccounted-for gas, network losses), applied to all exit points. The cost driver for such charge is the volume of gas withdrawn at exit points, based on historical average of year y-2.

Reference to consultation document(s). Provide document ID and relevant page(s).

§16.5-16.7

### C.8.B. The share of the allowed or target revenue forecasted to be recovered from such tariffs [Articles 26(1)(c)(i)(2), 4(3)(a)].

Share of transmission service revenue (allowed or target revenue) to be recovered by flow based charges (%)

36

Reference to consultation document(s). Provide document ID and relevant page(s).

Annex, Table 4

### C.8.C. The indicative flow-based charge [Articles 26(1)(c)(i)(3), 4(3)(a)].

Description:

CVU charge: 0.012 €/Sm<sup>3</sup>

Reference to consultation document(s). Provide document ID and relevant page(s).

Annex, Table 6

## C.9. Complementary revenue recovery charge: Information on commodity-based transmission tariffs referred to in Article 4(3) [Article 26(1)(c)(i)]

Do you use a complementary revenue recovery charge?

- Yes
- No

### C.9.A. The manner in which they are set [Articles 26(1)(c)(i)(1), 4(3)(b)].

Provide description, rationale and the extent to which the complementary revenue recovery charge is used.

ARERA proposes a complementary revenue recovery charge (CVFC), levied for the purpose of managing revenue under- and over-recovery, applied to exit points other than interconnection points.

Reference to consultation document(s). Provide document ID and relevant page(s).

§16.8-16.9

### C.9.B. The share of the allowed forecasted to be recovered from such tariffs or target revenue [Articles 26(1)(c)(i)(2), 4(3)(b)].

Share of transmission service revenue (allowed or target revenue) to be recovered by complementary revenue recovery charges.

The share of transmission service revenue (allowed or target revenue) to be recovered by complementary revenue recovery charges is not assessable at the moment, given that reconciliation of revenues for year 2022 will be known in 2023.

Reference to consultation document(s). Provide document ID and relevant page(s).

### C.9.C. The indicative complementary revenue recovery charge [Articles 26(1)(c)(i)(3), 4(3)(b)].

Description:

The charge CVFC is not assessable at the moment.

Reference to consultation document(s). Provide document ID and relevant page(s).

Annex, Table 6

## C.10. Information on non-transmission services provided to network users [Article 26(1)(c)(ii)]

Are there non-transmission services provided to network users on the bases of a non-transmission service tariff methodology?

- Yes  
 No

### C.10.A. Non-transmission service tariff methodologies [Articles 26(1)(c)(ii)(1), 4(1)].

Provide:

- List of services considered as non-transmission service on the basis of the criteria laid out in Article 4 (1).
- Users to which each of the non-transmission services applies. Indicate if it is not possible to identify the beneficiary of the non-transmission service.
- Explanation of the non-transmission tariff methodology provided per service.

Description:

There are two non-transmission tariffs to cover for the metering service:

- (i) A capacity-based tariff (CMT) applied to all delivery points in the system, to cover for the cost of meter and meter reading on the transmission network; it is determined as the ratio between CAPEX+OPEX and forecasted contracted capacity at delivery points. The tariff is a single tariff at national level, with a compensation mechanism between TSOs.
- (ii) A capacity-based tariff (CMCF) applied only to delivery points where the metering facility is owned by the TSO (instead of the final customer), to cover for the cost of the metering activity on such delivery points; for year 2024, it is computed as the ratio between CAPEX+OPEX related to such meter activity and forecasted contracted capacity on such delivery points; for subsequent years, it will be updated by taking variations of the gross investments deflator into account (same deflator index used for updating the RAB in real terms). The charge is differentiated (CMCF,A CMCF,B) according to the size of the meter at the specific delivery point (below / above 4,000 Sm<sup>3</sup>/h of technical flow capacity), based on a pre-determined ratio of 15% between the charge applied to bigger meters and the charge applied to smaller meters, to reflect economies of scale; the charges are scaled as to recover the same amount of revenues as it would be recovered via the single CMCF charge

Reference to consultation document(s). Provide document ID and relevant page(s).

Chapter 20; Annex, Table 6

### C.10.B. Share of the allowed or target revenue forecasted to be recovered from such tariffs, [Articles 26(1)(c)(ii)(2)]

Share of the allowed or target revenue forecasted to be recovered from non-transmission service tariffs. Provide, if possible, details per type of non-transmission service.



1.4

Reference to consultation document(s). Provide document ID and relevant page(s).

Annex, Table 4

### C.10.C. The manner in which the associated non-transmission services revenue is reconciled as referred to in Article 17(3) [Articles 26(1)(c)(ii)(3), 17(3)].

Provide details about how is the reconciliation done including the use of a regulatory account, the split of regulatory accounts into sub-accounts, and the use of separate accounts.

ARERA confirms a specific reconciliation account for the metering service (called FCM), in order to compensate for the differences (if any) between reference metering service revenues in a given year and actual metering service revenues for the same year. Revenues are recovered through the CVFC complementary revenue recovery charge.

Reference to consultation document(s). Provide document ID and relevant page(s).

§22.15-22.17

### C.10.D. Indicative non-transmission tariffs for non-transmission services to network users [Articles 26(1)(c)(ii)(4)].

Formula and description:

The indicative CMT tariff for year 2024 is 0.096 €/y/Sm<sup>3</sup>/day.  
The indicative CMCF tariff for year 2024 is 0.905 €/y/Sm<sup>3</sup>/day for meters below 4,000 Sm<sup>3</sup>/h of technical flow capacity and 0.136 €/y/Sm<sup>3</sup>/day for meters above 4,000 Sm<sup>3</sup>/h of technical flow capacity.

Reference to consultation document(s). Provide document ID and relevant page(s).

Chapter 20; Annex, Table 6

## D. Compared tariffs and tariff model [Article 26(1)(d)]

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### D.11. The indicative information set out in Article 30(2)

The comparison should be based on indicative reference prices. Whenever the data necessary for this comparison is not available at the time of the consultation on the RPM (e.g.: multipliers and seasonality), provide the date and the source where the information will be available.

D.11.A. Comparison between transmission tariffs applicable for:  
- the prevailing tariff period, and for

- the tariff period for which the information is published.

Explain the difference between the level of transmission tariffs [Articles 26(1)(d), 30(2)(a)(i)].

Comparison with the past tariff period. The comparison should be based on transmission tariffs.

Reference to consultation document(s). Provide document ID and relevant page(s).

Annex, Table 5; Annex, § 4.3-4.4. The difference in the level of transmission tariffs approved for the year 2023 and the indicative rates for the year 2024 depend on (i) variation in the level of allowed revenue to be recovered by capacity-based charges (+6%, affecting both entry and exit charges); (ii) change in the entry-exit split (from 28-72 to 25-75), determining an average variation of -11% on entry charges and +6% on exit charges; (iii) changes in the forecasted contracted capacities, determining an average variation of +2.8% on entry charges and -0.3% on exit charges; (iv) introduction of two new entry points from LNG (FSRU Ravenna and FSRU Piombino).

Link to information on TSO/NRA website.

**D.11.B. Comparison between transmission tariffs applicable for:**

- the tariff period for which the information is published, and for

- each tariff period within the remainder of the regulatory period.

Provide estimated difference in the level of transmission tariffs [Articles 26(1)(d), 30(2)(a)(ii)].

Comparison with upcoming tariff periods. The comparison should be based on transmission tariffs.

Reference to consultation document(s). Provide document ID and relevant page(s).

The current tariff period ends in 2023, hence refer to the previous answer (11.A).

Link to information on TSO/NRA website.

**D.11.C. At least a simplified tariff model, updated regularly, enabling network users to calculate the transmission tariffs applicable for the prevailing tariff period and to estimate their possible evolution beyond such tariff period [Articles 26(1)(d), 30(2)(b)].**

Tariff model for prevailing tariffs and future tariff periods. The simplified tariff model should serve for the calculation of tariffs. If the information on multipliers and seasonality is not available at the time of the publication of the consultation on the RPM, it should be indicated. By the time this information is published, the simplified tariff model should be updated to include information on tariffs.

Reference to consultation document(s). Provide document ID and relevant page(s).

The simplified is made available by the TSO Snam Rete Gas, in a dedicated section of its website.  
Reference to consultation document(s). §2.3

Link to information on TSO/NRA website.

[https://www.snam.it/it/trasporto/codice-rete-tariffe/Tariffe\\_trasporto/dco\\_tariff/sesto\\_periodo\\_regolazione.html](https://www.snam.it/it/trasporto/codice-rete-tariffe/Tariffe_trasporto/dco_tariff/sesto_periodo_regolazione.html)

#### D.11.D. Explanation of how to use the simplified tariff model [Articles 26(1)(d) and 30(2)(b)].

Reference to consultation document(s). Provide document ID and relevant page(s).

§2.3. Explanation is provided within the model.

## E. Fixed payable price under price cap regime [Article 26(1)(e)]

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### E.12. Where the fixed payable price referred to in Article 24(b) is offered under a price cap regime for existing capacity

Is the fixed payable price referred to in Article 24(b) offered under a price cap regime for existing capacity.

- Yes  
 No

## Documentation submission to the Agency

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The online template and the tool for the submission of files to the Agency is implemented over a secure IT connection based on https.

### Final consultation on the RPM

The Agency requests the NRA/TSO responsible for launching the final consultation on the RPM to follow the below requirements when submitting the consultation documentation to the Agency:

- **All files containing numerical data** must be provided to the Agency in non-protected Excel or Excel compatible files independently of how they are published in the consultation.
- **Files containing text** must be provided to the Agency in Word, Word compatible files, or PDF.
- **Files containing images** must be provided to the Agency in a commonly used image formats or PDF.
- **All data must be provided in non-protected files** that allow editing. If PDFs are used, they must not be protected against editing (e.g.: they must allow copying the text of the PDF)
- **Confidential information must be clearly marked as confidential. In the cases where the consultation includes confidential information, a non-confidential version of the consultation must also be provided as part of the documentation.** Such version can be prepared erasing or aggregating the sensible information to render the data non-confidential.

Upload consultation documentation

**d8c68126-878b-4c6f-b899-236434e0cbb2/IT\_-\_Public\_Consultation\_6PRT\_-\_Annex.pdf**  
**4e14b123-1b08-49e9-a233-837cc4feb3d5/IT\_-\_Public\_Consultation\_6PRT\_-\_Executive\_Summary\_2.pdf**  
**f2887927-2af0-4abc-bf0f-8ea63688b514/IT\_-\_Public\_Consultation\_6PRT\_2.pdf**

Provide a description of the uploaded documents and how they relate to the consultation (e.g.: main documents, supporting files, etc)

Main document contains the regulatory proposals. Annex contains data and simulations. Executive summary is a brief description of the main regulatory choices. Simplified tariff model is available at [https://www.snam.it/it/trasporto/codice-rete-tariffe/Tariffe\\_trasporto/dco\\_tariff/sesto\\_periodo\\_regolazione.html](https://www.snam.it/it/trasporto/codice-rete-tariffe/Tariffe_trasporto/dco_tariff/sesto_periodo_regolazione.html)

Information on confidentiality. If any of the submitted files are subject to confidentiality rules, please identify these files and provide additional non confidential versions.

### Cost allocation assessment justification

Does the capacity and/or the commodity cost allocation comparison index, as per Articles(3)(c) and Article(4)(c), exceed 10%?

- Yes  
 No

### Additional supporting documents

For the purpose of making the implementation of the TAR NC more efficient, the Agency provides below two sections to facilitate information on intermediate consultations and on the publication of stakeholder responses relative to the final consultation on the RPM. The Agency advocates that NRAs/TSOs provide links to this data and/or the documentation itself by the time it is available. The survey can be accessed after the submission of the final consultation for the purpose of providing this data.

### Final consultation on th RPM: responses and summary

Upload consultation documentation

Link to the consultation documents.

### Intermediate consultation(s) on th RPM

Upload intermediate consultation documentation.

Link to the consultation documents.

## Appendix: Instructions for using the survey

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**The online template and the tool for the submission of files to the Agency is implemented over a secure IT connection which will be operational as of end of September 2017.**

### Reading the survey

The online template lists all legal requirements for the consultation on the RPM according to Article 26. In addition, it provides interpretation and guidelines to several requirements of Article 26. These two levels of text can be distinguished based on the colour of the typography used:

- **Blue typography** replicates the text of the Tariff NC and provides references to articles of the Tariff NC.
- **Black typography** provides descriptions and clarifications to the text of the TAR NC.

The additional clarifications and guidelines provide the reasoning and arguments that ACER will employ when reviewing the consultations, following the requirement set in Article 27(2).

The online template is structured into five different sections following the structure of Article 26. At the end of the survey, a section for uploading the consultation document(s) is provided.

The online template mirrors all requirements laid out in the template checklist which is available at:

### Timeline for completing the survey

The online template can be filled as of its date of publication (5 July 2017). It can be saved as a draft and can be subsequently updated following the steps of the national process until the final submission. The Agency advocates that the NRA/TSO responsible for the consultation provides the requested information relative to the consultation on the RPM using the online template. This includes:

- **Prior to the consultation**, the NRA/TSO should provide details relative to the contact point, the estimated timeline for the consultation, and the planning of intermediate consultations, if any.
- **After the publication of the final consultation**, the NRA/TSO should submit details relative to the publication of the stakeholder responses [Article 26(3)] and the NRA motivated decision [Article 27(4)].

### NRA/TSO input on the survey

When filling out the survey, the NRA/TSO responsible for the consultation on the RPM, should provide the following information:

- **Descriptions and justifications** based the requirements listed on Article 26.
- **References to the consultation document(s)** where the requested information can be found. References should include the name of the document and the page(s) being referred.
- **Relevant information on the consultation process.**

Whenever the format of the survey incurs in any incompatibility with the structure of the consultation, the NRS/TSO should contact ACER.

## Submission of the consultation document(s) to the Agency

This platform allows NRAs/TSOs submitting the consultation document(s) to the Agency. The submission of these documents is an obligation laid out under Article 27(1) and it is independent of the use that NRAs /TSOs make of the template. For this purpose, the NRA/TSO carrying out the consultation can use this file submission tool above.

## Publication of the survey summary

Upon filling in the requested information laid out in the online template tool, the NRA/TSO can access a summary of the consultation on PDF format. The PDF document can be included as an annex to the national consultation.

Regardless of the NRA/TSO decision to publish this document, the Agency will release on its website the completed templates as part of its analyses on the RPM consultations [Article 27(2)].

## Useful links

[COMMISSION REGULATION \(EU\) 2017/460 of 16 March 2017 establishing a network code on harmonised transmission tariff structures for gas \(NC TAR\) \(http://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32017R0460&from=EN\)](http://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32017R0460&from=EN)

[ACER Tariff Template website \(http://www.acer.europa.eu/en/Gas/Framework%20guidelines\\_and\\_network%20codes/TAR\\_IMP/Pages/default.aspx\)](http://www.acer.europa.eu/en/Gas/Framework%20guidelines_and_network%20codes/TAR_IMP/Pages/default.aspx)

## Contact

tariff@acer.europa.eu

