

Framework Guideline on Tariffs



- OGP welcomes open consultation by ACER on draft FG
 - Positive changes include more flexibility in the NC development process and attempt to ensure consistency in tariffs for existing and incremental capacity
- Share the EC's comments, but concerned about further delay to FG
- Believe cost drivers (pipeline size) support tariffs at major entry points to be below exit tariffs to consumers
 - Should allow <25% of costs charged to entry when justified
- Support proportional tariffs for all short-term products
 - Use seasonal factors and multipliers (from 1 to 1.5) to avoid cross-subsidisation of short-term versus long-term products and avoid under-recovery due to profiled bookings
 - Bias in favour of short-term products undermines investments