

- We welcome ACER's consultation on cost-allocation methods
- Most important issues for OGP are:
  - 1) Appropriate entry/exit-split that reflects economies of scale and supports gas imports
    - OGP does not support 50/50-split as a general principle
  - 2) Stability of tariff regulation
    - Network users should be protected from significant and rapid tariff changes as result of regulatory changes
  - 3) Avoid discrimination and cross-subsidies between long-term and short-term capacity products

# Framework Guideline on Tariffs (2)

- Tariffs can vary significantly depending on the method used:

point   sect.	3.4.1.1	3.4.1.2 (A)	3.4.1.4
EN1	1,073	819	804
EN2	1,073	1,449	2,729
EN3	1,073	945	243

- NRAs should consult on selection of methodology
  - We support that at least 2 methods are examined in detail of which 1 is a harmonised reference method (to be selected)
  - NRAs should justify why other methods have not been selected for the short-list
  - Impact assessment should address the objectives of section 1.2, especially market integration and cross-border trade