

# **Comments on Guidelines on Transmission Tariffs (September 1st)**

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## ***(1) ETSO welcomes the following items :***

- **Harmonising G is realistic, and remove a distortive element due to a too wide spread of Gs.**
- **Absolute values of G and not relative shares G/L.**
- **Market based congestion management methods**
- **Subsidiarity for national locational signals.**
- **Harmonising G must take into account charging G for exporting situations of ITC.**

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## ***(2) Definition of « G »***

- Although the definition of the « annual national average G » component has been improved, some confusion remains : it can be understood that the only « fixed costs of the network » should be harmonised, while other fees (losses, ancilliary services) would not need to be (article 1.6).

However, ETSO considers that a lack of harmonisation is a distortive element in the competition for both of them.

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## **(3) *Ranges***

- The maximum value of 0.5 €/MWh is consistent with existing practices as far as G component includes only « fixed costs of the network ». It is no longer the case if losses and ancillary services components are concerned.
- The range of harmonised value for Nordel (article 1.3) should be :
  - 0.25 to 0.60 €/MWh excluding any explicit loss charges
  - 0.20 to 1.00 €/MWh including explicit loss charges