



**Consulta Pública 71 –  
*Proposta de alteração do  
articulado Regulamento  
Tarifário (RT)***

**Enagás comments**

**NON-CONFIDENTIAL RESPONSE**

1<sup>st</sup> March 2019

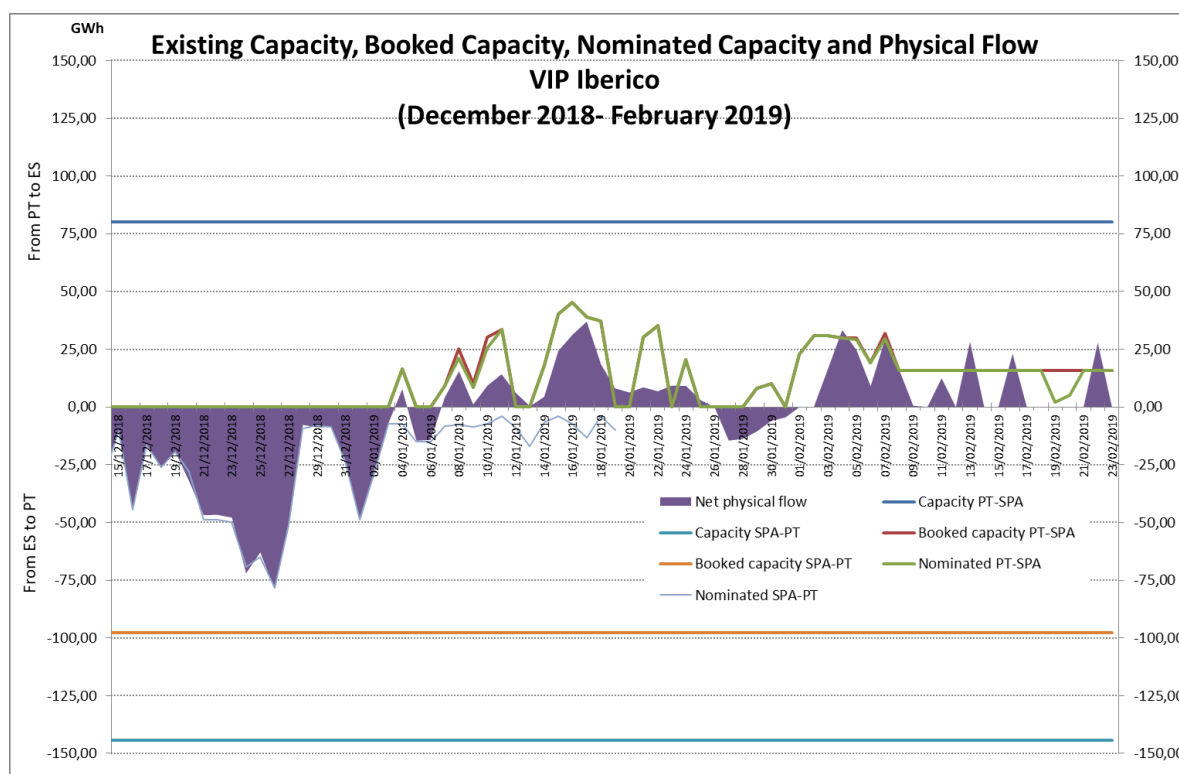


Enagás welcomes ERSE’s opportunity to contribute to the public consultation on the proposal to modify the *Regulamento Tarifário* (RT).

Enagás response to this consultation is **not confidential and not anonymous**.

From August to October 2018 ERSE carried out a public consultation on the implementation of the Network Code on harmonised transmission tariff structures for gas in Portugal. Enagás already expressed in this consultation its arguments against the zero reserve price at the exit through the VIP: *the zero reserve price at the exit through the VIP is not due to the result of the application of the reference price methodology but to an ad hoc decision. This should be carefully analysed.*

As Enagás anticipated in its response, the probability of punctual flow reversions will increase if a high level of utilisation in Sines is maintained together with the 0 exit tariff at VIP Pirineos. This has been the case since January 2019.



Later on, ACER in its [analysis](#) of the consultation document on the gas transmission tariff structure for Portugal considered that the arguments given by ERSE to fix a 0 tariff at the exit to Spain were not sufficient, and therefore the resulting deviation from the TAR NC was not justified. In the case of the VIP Ibérico, ACER considered that the point is not congested and the proposed 0 tariff does not serve to reduce congestion. For this reason, the cross subsidy resulting from the 0 tariff is not justified.

Furthermore, on page 11 ACER’s analysis stated that “ERSE commented in a clarification to the Agency that, should the flow direction change as a result of the use of zero capacity tariffs at the VIP exit, the RPM would have to be reconsidered.”

Taking into account that physical flow, the methodology should be reconsidered.

In more general terms, in the context of market integration in Iberia, ERSE and CNMC could jointly consider the appropriate level of tariff structure and methodology harmonisation for basic infrastructures in Portugal and Spain to ensure an efficient functioning of the gas market.