Bundesnetzagentur
Section 609
Postfach 8001
53105 Bonn

Subject: Security of Supply Scenario TENP - 2018-2028 Consultation NDP Gas

Dear Sirs,

With this letter Metaenergia S.p.A. submits its comments on the draft of the Security of Supply Scenario TENP as outlined in the national gas NDP 2018-2028.

Acting as a shipper and a trader in the NetConnect Germany market area, German – Switzerland route through Wallbach – Transitgas and Gries Pass connections play an important role for Metaenergia S.p.A.'s supply flexibility of its end customer portfolio in Italy and in general for its trading activities in European hubs.

Taking into account the results of the latest yearly and quarterly capacity auctions which have been held on PRISMA platform in July and August 2018, a drastic demand increase is in evidence on Wallbach Exit Interconnection Point even though relevant transmission tariffs have been increased by the German TSOs. This demand boost of the long term capacity auctions could be an indicator of the continuity of the increasing demand on Wallbach Exit capacity in shorter time frames in the upcoming gas years considering Italy's current natural gas supply source options.

Due to the ongoing maintenance works and thus the capacity unavailability of the TENP pipeline on Wallbach Exit Interconnection point, together with the long term Transitgas capacity holders' needs to satisfy their entry/exit capacities, an important number of shippers in Italy are being prevented from participating in using the German – Swiss route for their supply and trading needs and in consequence, neighbouring PSV market is facing difficulties as well to alternate its supply sources to physically balance the system state in urgent cases.

To sum up, Metaenergia S.p.A. underlines the cruciality of an higher technical available capacity at Wallbach Exit Interconnection point in order to provide shippers with equal opportunities supporting competition and to avoid potential system imbalances both in NCG and PSV market areas.

Rome, 30/08/2018

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