FLUXSWISS

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Section 609
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53105 Bonn

Your message dated	Your reference	Our reference	Date
	8615-NDP Gas 2018-2028 Consultation NDP Gas	RR-cf/2770	30/08/2018

Append(ix)(es)

Subject **FluxSwiss position paper: 2018-2028 Consultation NDP Gas**

Dear Madams and Sirs,

Herewith we refer to the BNetzA consultation workshop on the security of supply alternatives of the 10th July 2018 regarding the German Network Development Plan (NDP) 2018 and the subsequent market consultations (e.g. the consultation of 03 August 2018). FluxSwiss welcomes highly the opportunity to provide additional information to our letter DA-cf/2765 dated 13/07/2018 which we sent to FNBgas in the context of the FNB-consultation on the National Development Plan 2018-2028.

FluxSwiss, in its capacity as a major Swiss TSO commercializing most of the transit capacities on the Transitgas pipeline, would like to highlight that the results of the recent PRISMA auctions for Gas Year capacity and Quarterly capacity are showing that the **Wallbach Exit point is contractually congested**, and therefore indicate that the current Technical Available Capacity of **13.3 GWh is not sufficient to satisfy the current and future market demand** of Italy and Switzerland. Based on information that we received from our contacts with the Swiss and Italian market parties and authorities, we assume that the demand will further increase in the coming years, which will make the situation at the Wallbach border point even more stressed.

In particular, we noticed that FZK capacity Exit Wallbach for Gas Year 2018 (runtime 01.10.2018 – 01.10.2019) completely sold out during the July auction after **16** rounds of bidding, reaching a surcharge of 136 cent/kWh/h/Runtime which represents a **45% premium** over the base price. It is also significant that against an offered amount of 3.1 GWh/h, demand was 6.7 GWh/h and remained over **200%** of the offered capacity for 9 rounds. In our opinion, this result indicates a capacity need for at least additional 3.6 GWh/h, which we request to be further investigated for possible further reinstatement of the TENP-capacity.

The PRISMA report of this auction is enclosed as Annex 1.

Similar to the Gas Year auction, the recent quarterly auction for FZK capacity also showed significant congestion. Q4 capacity (runtime 01.10.2018 - 01.01.2019) sold out after **15** rounds,

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closing with a **premium of 60%** over the auction price and with 1.8 GWh/h requested against 0.8 GWh/h offered. The PRISMA report of this auction is enclosed as Annex 2.

In conclusion, FluxSwiss would like to emphasize the paramount importance of **providing a higher technical available capacity at exit Wallbach** than the quantity presented in the current scenario, in order **to resolve present and future congestions at exit Wallbach**.

Looking forward to discuss our position in the appropriate venues, at the relevant occasions we remain at your disposal to support and clarify our statements.

Best regards,

FluxSwiss Sagl

Raoul Raffagli
Commercial Manager

Damien Adriaens
Deputy Chief Executive Officer

Annex 1

Auction ID 20550061

Wallbach - Exit

FINISHED

AUCTION DETAILS

RESULT

Offered by FLUXYS TENP

Surcharge	136 cent/kWh/h/Runtime
Start date	02.07.2018 09:00
End date	05.07.2018 16:00
Marketable capacity	3,100,570 kWh/h
Marketed capacity	3,099,710 kWh/h
Non-competing capacity	3,100,570 kWh/h
Runtime	01.10.2018 06:00 - 01.10.2019 06:00

PRODUCT

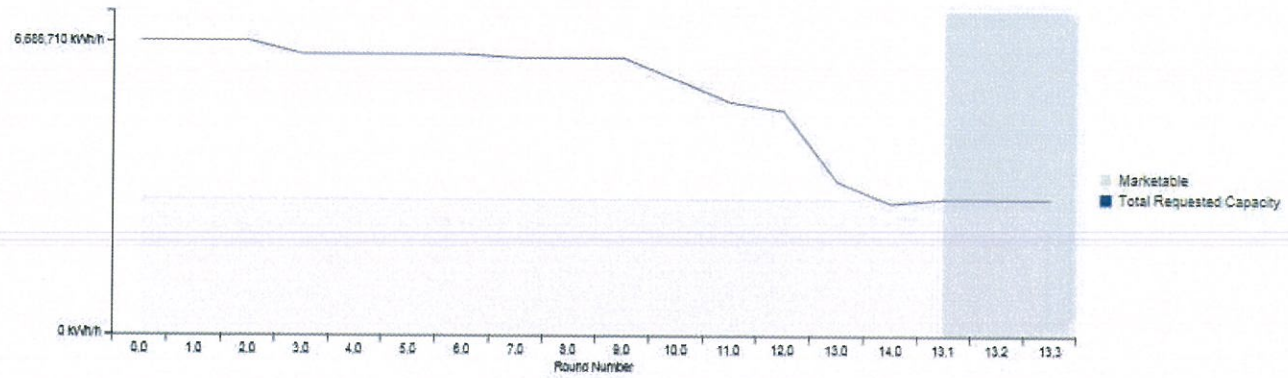
EXIT

Wallbach - Exit
Fluxys TENP GmbH
H-gas , FZK
ID 21Z0000000001216
Flow unit kWh/h

PRICING

Regulated tariff EXIT	300.15907295 cent/kWh/h/Runtime
Starting price	300.15907295 cent/kWh/h/Runtime
Surcharge	136 cent/kWh/h/Runtime
Large price step	10 cent/kWh/h/Runtime
Small price step	2 cent/kWh/h/Runtime
Number of large price steps	13
Number of small price steps	3

BIDDING ROUNDS



Annex 2

Auction ID 21788012

Wallbach - Exit

FINISHED

AUCTION DETAILS

RESULT

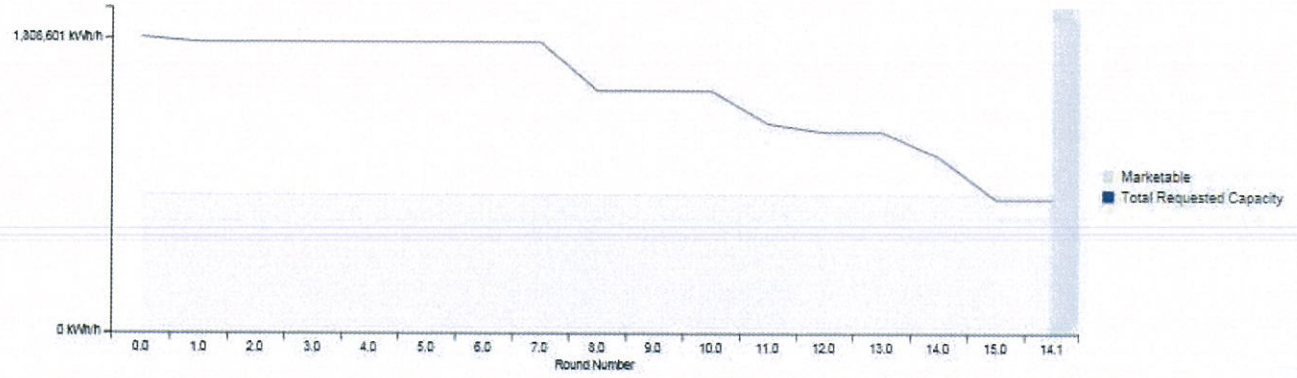
Offered by FLUXYS TENP

Surcharge	35.5 cent/kWh/h/Runtime
Start date	06.08.2018 09:00
End date	09.08.2018 14:00
Marketable capacity	848,601 kWh/h
Marketed capacity	818,601 kWh/h
Non-competing capacity	848,601 kWh/h
Runtime	01.10.2018 06:00 - 01.01.2019 06:00

PRODUCT

EXIT
Wallbach - Exit
Fluxys TENP GmbH
H-gas , FZK
ID 21Z0000000001216
Flow unit kWh/h

PRICING

Regulated tariff EXIT	58.67087065 cent/kWh/h/Runtime
Starting price	58.67087065 cent/kWh/h/Runtime
Surcharge	35.5 cent/kWh/h/Runtime
Large price step	2.5 cent/kWh/h/Runtime
Small price step	0.5 cent/kWh/h/Runtime
Number of large price steps	14
Number of small price steps	1

BIDDING ROUNDS