Gas Network Development Plan (NDP) 2018-2028 drafted by the transmission system operators - Consultation on the draft of the security of supply scenario TENP (as of 01 August 2018) presented by the transmission system operators

Eni's statement

Eni would like to thank the BNetzA for the opportunity to submit comments to the draft of the security of supply scenario TENP presented by the German transmission system operators (TSOs) in the frame of the Gas Network Development Plan (NDP) 2018-2028.

As already stated in response to FNB consultation in mid-July, Eni appreciates the analysis performed by the FNB to model the supply security variant considering the case that the current transportation situation on TENP I could be continued beyond September 30th 2020, with the focus on both identifying the measures needed to secure the required firm capacity for the supply of Baden-Württemberg and, at the same time, presenting the required services to Switzerland and Italy via the Wallbach IP.

In particular, we understand that:

- the proposed building of 54 km of additional transmission infrastructure for the TENP as part of three grid expansion projects is needed to ensure the coverage of the quota of around 5.2 GWh/h in overall capacity requirement of terranets bw estimated for 2023/2024 to supply the distribution system operators, industrial customers and power stations in Baden-Württemberg (as well as the connected areas of Vorarlberg, Liechtenstein and parts of Switzerland);
- This aforesaid quota is equal to the foreseen increase in terranets' needs compared to 2018 and cannot be covered by the four points interconnecting the TENP with terranets' grid due to the permanent capacity restriction on the TENP assumed in the security of supply scenario TENP;
- the analysis of historical data for the period October 2013 – October 2017 performed by the TSOs has proved that the 13,3 GWh/h of exit capacity currently available at IP Wallbach are needed to supply Switzerland (the requirements of which are estimated to be around 10 GWh/h) and "*to a sufficient extent*" Italy.

Following on from that and also considering that "*future capacity requirements of Switzerland and Italy are not part of the TENP supply security variant and, from the point of view of the transmission system operators, may have to be included in the scenario framework for the network development plan via other processes (including incremental capacity procedures)*" – as explicitly stated by the TSOs in their document - we assume that, in the frame of the principles proposed by the BNetzA for the implementation of the EC network code on harmonised transmission tariff structures, no major nor improper impacts on the exit tariffs at Wallbach of the 171 Mio. Euro estimated costs for the proposed network expansion projects are to be expected.

Under the above assumptions, we confirm that in general terms we share the evaluations performed by the TSOs in their document as well as their proposal of network expansions.

San Donato Milanese, 31 August 2018

Eni SpA