

#### **ACER Consultation Template**

**Tariff NC Article 26(5)** 

The following document constitutes support material for the online template created by the Agency for the Coordination of Energy Regulators ('the Agency) for the national consultations to be carried out according to the Commission Regulation (EU) 2017/460 of 16 March 2017 establishing a Network Code on Harmonised transmission tariff structures for gas ('TAR NC').

# The document should not be used independently of the online template provided by the Agency, which can be accessed at:

http://www.acer.europa.eu/Official\_documents/Public\_consultations/Pages/ACER-Consultation-Template.-Tariff-NC-Article-26(5).aspx

The document provides a checklist of consultation obligations on the reference price methodology ('RPM') as laid out in Article 26, as well as an interpretation to several aspects of Article 26, clarifying the criteria and the principles which will be used by the Agency in its review. It is intended to support NRAs and TSOs in their effort to comply with their respective legal obligations.

The obligations here listed mirror those which have been made part of the online template, which is accessible in the link above.

Where relevant, the cell provides a reference to the relevant Article of the TAR NC:

- <u>Blue table cells</u> replicates the text of the Tariff NC and provides references to articles of the TAR NC.
- <u>White table cells</u> provides descriptions and clarifications to the text of the TAR NC.

Further information on the template shall be found at the above link in the Agency's website.

#### [1] Information on the parameters used in the proposed RPM related to technical characteristics of the transmission system [Art. 26(1)(a)(i), Art. 30.(1)(a)]: Provide the information on the parameters listed in Article 30(1)(a)(i-v) when they are an input to the proposed RPM. For parameters that are not an input to the RPM, mark as 'Not applicable'. The description of the RPM and the justification of the parameters may refer to information requested in other points of Article 26 and in other articles, such as Article 7. Article [A] Description of the proposed reference price methodology. 26(1)(a)Reference to consultation document(s): Chapter 19 (capacity-commodity split), 20 (entry-exit split), 21 (reference price methodology) and 26 (inter-TSO compensation) Description: The proposed reference price methodology (RPM) is the capacity weighted distance (CWD), with the following cost drivers: average distance for each entry point/cluster of entry point and for each exit point/cluster of exit points; forecasted contracted capacity (§21). Locational signals resulting from the CWD reflect the relative distance between each entry/exit point and an average location, weighted by the forecasted booked capacity; in principle, the farthest the distance, the highest the charge. ARERA deems that the proposed methodology guarantees a high degree of cost reflectivity. Entry/exit split is 28/72, and has been set to replicate the current 40/60 split on the national network and 0/100 split on the regional network. This setting avoids the cost of the latter is improperly charged to the entry points. The 40/60 split is motivated by considering the utilisation rates of the entry points in the last years; in general, this choice is made to ensure a higher degree of competitiveness for gas supply at the national level and to foster the alignment of the PSV price to the price of the other European hubs (§20). Capacity/commodity split is 85/15. The capacity share covers mainly capital costs (asset remuneration and depreciation), which are fixed costs. The commodity share covers operating costs, losses, fuel gas and unaccounted for gas, which are mainly variable costs (§19). The intra-system/cross-system split is 99.7/0.3. For the purpose of CWD calculations, grouping of entry points from production facilities (into 10 production hubs) and of domestic exit points (into 6 exit areas) is performed (§21.7). The following adjustments are proposed. • Equalisation, whereby the same reference price is applied to the following groups of points: entry points from storage; exit points to storage, domestic exits (§21.10-21.12). Rescaling for reference prices resulting from the CWD RPM after storage discounts, by ο multiplying entries and exits for the respective constant. This operation is performed to guarantee the recovery of the allowed revenue with respect to forecasted contracted capacity (§21.15-21.16). No benchmarking is applied. 0 For domestic exits (delivery points) within 15 km from the national network, a tariff corresponding to 90% of the tariff for domestic exits over 15 km is applied. To avoid cross-subsidies between domestic exits and other exit points, the tariff for points over 15 km is determined in order to keep the overall revenue from domestic exits unchanged (§21.27-21.19). 50% discount for storage, no discount for LNG (§21.13-21.14) Since the Italian system is characterised by the same entry charge and exit charge for multiple TSOs, an inter-TSO compensation mechanism is in place, in order to ensure each TSO a revenue consistent with its allowed costs (§26). Articles 26(1)(a)(i) **[B]** Justification of the parameters used that are related to the technical characteristics of the system 30(1)(a)(i-v)

[A] ART. 26(1)(A): PROPOSED REFERENCE PRICE METHODOLOGY

	<ul> <li>Capacity cost driver: forecasted contracted capacity in a calendar year, determined as weighted average of the forecasted contracted capacity for the two gas years relevant for the calendar year. This estimation includes also short-term capacity and interruptible capacity.</li> <li>Distance cost driver: given the peculiarities of the Italian system, characterised by two classes of transmission services, on national and regional networks, distance is calculated according to the following criteria:         <ul> <li>for the national network, the physical distance on the shortest route from one entry/cluster of entry point to one exit/cluster of exit point;</li> <li>for the regional network, the average distance from the national network of delivery points belonging to an exit area, weighted by the forecasted contracted capacity in those same delivery points.</li> </ul> </li> </ul>		
Articles 26(1)(a)(i) 30(1)(a)(i)	Reference to consultation document(s). §21.5 and §21.6         [C]       Technical capacity at entry and exit points. Values	Associated assumptions	
	Not applicable.	Not applicable.	
Articles 26(1)(a)(i) 30(1)(a)(ii)	[D] Forecasted contracted capacity at entry and exit points. Values	Associated assumptions	
	Reference to consultation document(s). Chapter 29, Table 7	Capacity is based on a forecast by the TSO Snam Rete Gas on gas years 2019-20 and 2020-21. It also includes: (i) a forecast on short-term bookings, given the respective level of multiplier; (ii) a forecast on interruptible capacity, given the respective level of discount. For each tariff year, assumptions and data on forecasted capacity are provided by Snam Rete Gas and subject to approval by ARERA. Reference to consultation document(s): §21.5	
Articles 26(1)(a)(i) 30(1)(a)(iii)	[E] The quantity and the direction of the gas flow for entry and exit points. Values	Associated assumptions	
	Not applicable.	Not applicable.	
Articles 26(1)(a)(i) 30(1)(a)(iv)	<b>[F]</b> Structural representation of the transmission network with an appropriate level of detail	Associated assumptions	
	Reference to consultation document(s): Chapter 29, Figure 1 For a more detailed representation of the network, see also the following webpages: http://www.snam.it/it/trasporto/Processi_Online/ReteSnamReteGas/inf ormazioni/rete-srg/index_rete.html http://www.snam.it/it/trasporto/Processi_Online/ReteSnamReteGas/in formazioni/rete-nazionale-gasdotti/1_rete-naz-gasd.html.	Reference to consultation document(s):	
Articles 26(1)(a)(i)	[G] Additional technical information about the transmission network, such as: the length and the diameter of pipelines and the power of compressor stations	Associated assumptions	

0(1)(a)(v)					
		document(s). Not applicabl ded in Tables 8, 9 and 10 (			consultation document(s) 9, footnotes to Tables 8, 9
	value of the proposed adju (a)(ii)]:	stments for capacity-base	ed transmission t	ariffs pursuant	to Article 9 [Art.
Articles 6(1)(a)(ii) 9(1)	[A]Proposed discount(s)	at entry points from and	exit points to sto	orage facilities	
	Yes, namely: 50% at entr the initial result of the RF	y points from storage facili PM (§21.13).	ities and 50% at e	xit points to sto	rage facilities compared to
Articles 6(1)(a)(ii) 9(2)	[B] Proposed disco	unt(s) at entry points fror	n LNG facilities		
	Not applicable (§21.14).				
Articles 5(1)(a)(ii) 9(2)		unt(s) at entry points from isolation of Member Stat		to infrastructu	are developed with the
	Not applicable.				
1 India	ative reference prices subj	ect to consultation [Art ]	26(1)(a)(iii)		
I INCL					
Article	[A]Indicative reference p	orices at each entry and a	t each exit point		
Article	[A]Indicative reference p		t each exit point		
Article 5(1)(a)(iii)	[A]Indicative reference p	brices at each entry and a document(s). Chapter 31, 7	t each exit point		
Article 5(1)(a)(iii) Cost a ccording location gency re gether w hen the c	[A]Indicative reference p Reference to consultation	<ul> <li>brices at each entry and a document(s). Chapter 31, 7</li> <li>c6(1)(a)(iv), Art.5]</li> <li>ency shall assess the compliance application is a compliance application to a compliance the solution once the solution. This justification is</li> </ul>	t each exit point Tables 12 and 13 liance of Article 7 lies to the cost all o submit a justific e consultation is 1	ocation assessm cation of the cos aunched. This ap	ent. For this purpose, the t allocation assessment pplies only for the case
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1	Reference to consultation document(s). Chapter 32, Table 16	Reference to consultation document(s). Chapter 32, Table 16
[	[C] Details of components of the cost allocation a	ssessment
	Capacity cost allocation assessment	Commodity cost allocation assessment
	Capacity cost driver: forecasted contracted capacity	Commodity cost driver: withdrawn volume of gas
	ment of the proposed reference price methodology in a to $715/2009$ [Art. $26(1)(a)(v)$ ].	accordance to Art.7 and Art. 13 of the Regulation
the purpose	y will evaluate the compliance of the RPM against the set of making explicit the criteria that will be used for this a list of suggestions to follow in the assessment.	
Quantitative	e analyses and stakeholder support will be taken by the A will be reviewed based on the explanations provided.	gency as evidence. When such proofs are not available,
Articles 26(1)(a)(v)		
		eproduce the calculation of reference prices and their
13 [Reg. (EC) No 715/2009]		
	in the TAR NC, with adjustments as previously describe Moreover, the introduction of a flow-based complementa	
	based tariffs. Provide the reference to the consultation document(s): § 2	21.21
[	[B] The RPM shall into account the actual costs considering the level of complexity of the transmiss	incurred for the provision of transmission services ion network.
	The CWD methodology ensures a high degree of cost-r capacity and distance. For the purpose of CWD calculation, grouping of entry is a necessary step given the complexity of the network	points from production facilities and domestic exit points
1	while avoiding the allocation of regional network costs cross-border points.	ion between entry and exit points of the national network, (which are only used for serving domestic customers) to
	[C] The RPM shall ensure non-discrimination ar	nd shall prevent undue cross-subsidisation including
-	The RPM does not create cross-subsidies among netwo allocation assessments. As the methodology takes distant subsidisation is limited when compared to other method which result in more homogenous sets of tariffs. The in undue cross-subsidisation between domestic and cross- (respectively, 50% and zero) has been set at the lowest	rk users, as shown also by the results of the cost nce as a relevant cost driver, the degree of cross dologies which do not take distance into account – and clusion of the regional network does not result in an border points. Discounts for storage and LNG
	Concerning the equalisation of domestic exits (delivery between final customers in different areas is resulting (	\$21.16), it must be considered that it avoids outliers in the nable in terms of cost-reflectivity and are only related to ogy. Also, it must be considered that such equalisation
	Provide the reference to the consultation document(s): §2	
	entry-exit system is not assigned to final customers	
	With reference to the volume risk, the RPM guarantees a The volume risk for final customers within the Italian e/e flows, is indeed very low as the volumes of natural gas t volumes (lower than 1%). Therefore, changes in the volu in the tariff revenue.	e system, related to the potential volatility of transit for exports only represent a small share of the total
7 13 [Reg. (EC) No 715/2009]	<ul> <li>accurate forecast.</li> <li>The proposed RPM is sufficiently clear and transparent, in the TAR NC, with adjustments as previously describe Moreover, the introduction of a flow-based complements based tariffs.</li> <li>Provide the reference to the consultation document(s): § 2</li> <li><b>B</b> The RPM shall into account the actual costs considering the level of complexity of the transmiss.</li> <li>The CWD methodology ensures a high degree of cost-r capacity and distance.</li> <li>For the purpose of CWD calculation, grouping of entry is a necessary step given the complexity of the network The 28/72 E/E split allows an almost symmetric allocat while avoiding the allocation of regional network costs cross-border points.</li> <li>Provide the reference to the consultation document(s): §2</li> <li><b>C</b> The RPM shall ensure non-discrimination ar by taking into account the cost allocation assessment. As the methodology takes distas subsidisation is limited when compared to other method which result in more homogenous sets of tariffs. The in undue cross-subsidisation between domestic and cross-(respectively, 50% and zero) has been set at the lowest public subsidies.</li> <li>Concerning the equalisation of domestic exits (delivery between final customers in different areas is resulting (§ tariffs as a result of the CWD, which do not seem reaso the simplified approach implied in the CWD methodold does not affect the outcome of the cost allocation assess for intra-system use.</li> <li>Provide the reference to the consultation document(s): §2</li> <li><b>D</b> The RPM shall ensure that significant volume entry-exit system is not assigned to final customers.</li> <li>With reference to the volume risk, the RPM guarantees a the volume risk for final customers within the Italian e/of flows, is indeed very low as the volumes of natural gas i volumes (lower than 1%). Therefore, changes in the volume volume so the volume risk for final customers within the volume flows.</li> </ul>	as it is mainly based on the CWD methodology desc d in sections 1A and 1B. ary revenue recovery charge adds stability to capacity 21.21 incurred for the provision of transmission service ion network. effectivity, as it is based on both the cost drivers of points from production facilities and domestic exit p ion between entry and exit points of the national netw (which are only used for serving domestic customers 1.22 d shall prevent undue cross-subsidisation includints set out in Article 5. rk users, as shown also by the results of the cost nece as a relevant cost driver, the degree of cross dologies which do not take distance into account – ar clusion of the regional network does not result in an border points. Discounts for storage and LNG possible level in order to limit the extent of cross- points), though some degree of cross-subsidisation \$21.16), it must be considered that it avoids outliers i nable in terms of cost-reflectivity and are only relate ogy. Also, it must be considered that such equalisatio sment as it only operates on a group of points which is 1.23 the risk related particularly to transports across an within that entry-exit system. m adequate stability and certainty of the tariff revenue e system, related to the potential volatility of transit for exports only represent a small share of the total

	Provide the reference to the consultation document(s): §21.24
	<b>[E]</b> The RPM shall ensure that the resulting reference prices do not distort cross-border trade.
	On the principle of non-distortion of cross-border trade, it is important to note that, compared to the current
	methodology, the proposed RPM involves a greater alignment of both entry and exit reference prices related to
	cross-border points. With particular reference to entry points, this also reduces distortions in choosing the source
	of supply, fostering market competitiveness.
	Provide the reference to the consultation document(s): §21.25
	arison with the CWD methodology (Art. 8) Accompanied by the indicative reference prices subject to
consul	tation set out in Art.26(1)(a)(iii).
Articles	[A] Where the proposed reference price methodology is other than the capacity weighted distance
26(1)(a)(vi)	reference price methodology detailed in Article 8, a comparison between both methodologies should be
20(1)(a)(VI)	performed.
Article 8	
	Provide reference to consultation document(s): Chapter 31, Table 12 and §31.4. The only difference between the
	CWD as described in Article 8 of the TAR NC and the proposed RPM is the E/E split. The effect at entry and exit
	points is symmetrical: the 50/50 would yield lower (-44%) reference prices at entry points and higher (+44%)
	reference prices at exit points.
Articles	[B] Comparison of indicative reference prices at each entry point and at each exit point of the
26(1)(a)(vi)	proposed RPM and the CWD detailed in Article 8.
8	
	Reference to consultation document(s). Chapter 31, Table 12 shows the difference between the proposed E/E split
	(28/72) and the E/E split detailed in Article 8 of the TAR NC (50/50). The E/E split is the only element which
	differs from the CWD methodology as described in Article 8.
	[B] ALLOWED OR TARGET REVENUE OF THE TSO [ART. 26(1)(B)]
[7] Indica	tive information set out in Article 30(1)(b)(i), (iv), (v).
Articles	[A]Allowed or target revenue, or both, of the transmission system operator.
26(1)(b)	
30(1)(b)(i)	
30(1)(0)(1)	
	Description: Allowed revenue: 2,101,100,000 €
	Figures presented in this Section B are indicative for year 2020, at system level (all TSO). For a more detailed
	breakdown of revenues for year 2019, please refer to information published in Annex to ARERA's resolution
	306/2018/R/gas of 1 <sup>st</sup> June 2018.
	Reference to consultation document(s). § 30.1 and 30.2; Chapter 30, Table 11
Articles	[B] Transmission services revenue.
26(1)(b)	
30(1)(b)(iv)	
30(1)(b)(iv)	
	Description: 2,058,800,000 €
	Description: 2,058,800,000 €
	Description: 2,058,800,000 € Reference to consultation document(s). Chapter 30, Table 11
Articles	Reference to consultation document(s). Chapter 30, Table 11
Articles 26(1)(b)	Reference to consultation document(s). Chapter 30, Table 11         [C]       Capacity-commodity split of the transmission services revenue.
26(1)(b)	Reference to consultation document(s). Chapter 30, Table 11         [C] Capacity-commodity split of the transmission services revenue.         Breakdown between the revenue from capacity-based transmission tariffs and the revenue from commodity-based transmission tariff.
	Reference to consultation document(s). Chapter 30, Table 11         [C] Capacity-commodity split of the transmission services revenue.         Breakdown between the revenue from capacity-based transmission tariffs and the revenue from commodity-based transmission tariff.
26(1)(b)	Reference to consultation document(s). Chapter 30, Table 11         [C] Capacity-commodity split of the transmission services revenue. Breakdown between the revenue from capacity-based transmission tariffs and the revenue from commodity-based transmission tariff.
26(1)(b)	Reference to consultation document(s). Chapter 30, Table 11         [C] Capacity-commodity split of the transmission services revenue. Breakdown between the revenue from capacity-based transmission tariffs and the revenue from commodity-based transmission tariff.         Revenue from recovered from capacity-based transmission tariffs: 1,757,700,000 €
26(1)(b)	Reference to consultation document(s). Chapter 30, Table 11         [C] Capacity-commodity split of the transmission services revenue. Breakdown between the revenue from capacity-based transmission tariffs and the revenue from commodity-based transmission tariff.
26(1)(b)	Reference to consultation document(s). Chapter 30, Table 11         [C] Capacity-commodity split of the transmission services revenue.         Breakdown between the revenue from capacity-based transmission tariffs and the revenue from commodity-based transmission tariffs.         Revenue from recovered from capacity-based transmission tariffs: 1,757,700,000 €         Revenue from recovered from commodity-based transmission tariffs: 301,100,000 €
26(1)(b) 30(1)(b)(v)(1	Reference to consultation document(s). Chapter 30, Table 11         [C] Capacity-commodity split of the transmission services revenue. Breakdown between the revenue from capacity-based transmission tariffs and the revenue from commodity-based transmission tariffs.         )       Revenue from recovered from capacity-based transmission tariffs: 1,757,700,000 €         Revenue from recovered from commodity-based transmission tariffs: 301,100,000 €         Reference to consultation document(s). Chapter 30, Table 11
26(1)(b) 30(1)(b)(v)(1 Articles	Reference to consultation document(s). Chapter 30, Table 11         [C] Capacity-commodity split of the transmission services revenue. Breakdown between the revenue from capacity-based transmission tariffs and the revenue from commodity-based transmission tariffs.         )       Revenue from recovered from capacity-based transmission tariffs: 1,757,700,000 €         Revenue from recovered from capacity-based transmission tariffs: 301,100,000 €         Reference to consultation document(s). Chapter 30, Table 11         [D] Entry-exit split of the transmission services revenue.
26(1)(b) 30(1)(b)(v)(1	Reference to consultation document(s). Chapter 30, Table 11         [C] Capacity-commodity split of the transmission services revenue. Breakdown between the revenue from capacity-based transmission tariffs and the revenue from commodity-based transmission tariffs.         )       Revenue from recovered from capacity-based transmission tariffs: 1,757,700,000 €         Revenue from recovered from commodity-based transmission tariffs: 301,100,000 €         Reference to consultation document(s). Chapter 30, Table 11

30(1)(b)(v)(2)	
	Revenue from capacity-based transmission tariffs at <u>all entry points</u> : 492,200,000 € Revenue from capacity-based transmission tariffs at <u>all exit points</u> : 1,265,600,000 €
	Reference to consultation document(s). Chapter 30, Table 11
Articles 26(1)(b) 30(1)(b)(v)(3)	[E] Intra-system/cross-border split of the transmission services revenue. Breakdown between the revenue from domestic network users at both entry points and exit points and the revenue from cross-border network users at both entry points and exit points calculated as set out in Article 5.
	Revenue <u>from domestic</u> network users at entry points and exit points: 2,052,623,000 € Revenue <u>from cross-border</u> network users at entry points and exit points: 6,176,400 € Reference to consultation document(s). Chapter 30, Table 11

### [C] INFORMATION ON COMMODITY BASED AND NON-TRANSMISSION TARIFFS [ART. 26(1)(C)]

Following Article 27(2), the Agency shall analyse the compliance of the criteria used for setting commodity-based tariffs as set out in Article 4(3), and of the criteria used for setting non-transmission tariffs as set out in Article 4(4). The analysis of compliance will be based on the terms listed in this section.

Articles	
26(1)(c)(i)(1)	[A]The manner in which they are set.
20(1)(C)(1)(1)	
4(3)(a)	
	ARERA proposes a single flow-based charge, levied for the purpose of covering operating costs (including
	fuel costs, unaccounted-for gas, network losses), applied to all exit points. The cost driver for such charge is the volume of gas withdrawn at exit points, based on historical average of year <i>y</i> -2.
	Reference to consultation document(s). §19.2 - §19.4
Articles	<b>[B]</b> The share of the allowed or target revenue forecasted to be recovered from such tariffs.
26(1)(c)(i)(2)	
4(3)(a)	
	Share of transmission service revenue (allowed or target revenue) to be recovered by flow based charges: 15%
	Reference to consultation document(s). Chapter 30, Table 11
Articles 26(1)(c)(i)(3)	[C] The indicative flow-based charge.
4(3)(a)	
	<i>CV</i> charge: 0.0035 €Scm
9] Comple	Reference to consultation document(s). Chapter 30, Table 11
) Comple Article	Reference to consultation document(s). Chapter 30, Table 11 mentary revenue recovery charge: Information on commodity-based transmission tariffs referred to in
	Reference to consultation document(s). Chapter 30, Table 11 mentary revenue recovery charge: Information on commodity-based transmission tariffs referred to in
Article	Reference to consultation document(s). Chapter 30, Table 11 mentary revenue recovery charge: Information on commodity-based transmission tariffs referred to in 4(3):
Articles	Reference to consultation document(s). Chapter 30, Table 11 mentary revenue recovery charge: Information on commodity-based transmission tariffs referred to in 4(3):
Articles Articles 26(1)(c)(i)(1)	Reference to consultation document(s). Chapter 30, Table 11         mentary revenue recovery charge: Information on commodity-based transmission tariffs referred to in 4(3):         [A]       The manner in which they are set.
Articles Articles 26(1)(c)(i)(1)	Reference to consultation document(s). Chapter 30, Table 11 mentary revenue recovery charge: Information on commodity-based transmission tariffs referred to in 4(3):
Articles Articles 26(1)(c)(i)(1)	Reference to consultation document(s). Chapter 30, Table 11         mentary revenue recovery charge: Information on commodity-based transmission tariffs referred to in tag:         (A)         The manner in which they are set.         ARERA proposes a complementary revenue recovery charge, levied for the purpose of managing revenue under- and over-recovery, applied to exit points other than interconnection points.
Articles Articles 26(1)(c)(i)(1) 4(3)(b)	Reference to consultation document(s). Chapter 30, Table 11         mentary revenue recovery charge: Information on commodity-based transmission tariffs referred to in 4(3):         [A] The manner in which they are set.         ARERA proposes a complementary revenue recovery charge, levied for the purpose of managing revenue under- and over-recovery, applied to exit points other than interconnection points.         Reference to consultation document(s). §19.5 and §19.6
Articles Articles 26(1)(c)(i)(1) 4(3)(b) Articles	Reference to consultation document(s). Chapter 30, Table 11         mentary revenue recovery charge: Information on commodity-based transmission tariffs referred to in tag:         (A)         The manner in which they are set.         ARERA proposes a complementary revenue recovery charge, levied for the purpose of managing revenue under- and over-recovery, applied to exit points other than interconnection points.
Articles Articles 26(1)(c)(i)(1) 4(3)(b) Articles	Reference to consultation document(s). Chapter 30, Table 11         mentary revenue recovery charge: Information on commodity-based transmission tariffs referred to in 4(3):         [A] The manner in which they are set.         ARERA proposes a complementary revenue recovery charge, levied for the purpose of managing revenue under- and over-recovery, applied to exit points other than interconnection points.         Reference to consultation document(s). §19.5 and §19.6
Articles Articles 26(1)(c)(i)(1) 4(3)(b) Articles	Reference to consultation document(s). Chapter 30, Table 11         mentary revenue recovery charge: Information on commodity-based transmission tariffs referred to in 4(3):         [A] The manner in which they are set.         ARERA proposes a complementary revenue recovery charge, levied for the purpose of managing revenue under- and over-recovery, applied to exit points other than interconnection points.         Reference to consultation document(s). §19.5 and §19.6
Articles 26(1)(c)(i)(1) 4(3)(b) Articles 26(1)(c)(i)(2)	Reference to consultation document(s). Chapter 30, Table 11         mentary revenue recovery charge: Information on commodity-based transmission tariffs referred to in 4(3):         [A] The manner in which they are set.         ARERA proposes a complementary revenue recovery charge, levied for the purpose of managing revenue under- and over-recovery, applied to exit points other than interconnection points.         Reference to consultation document(s). §19.5 and §19.6
Articles 26(1)(c)(i)(1) 4(3)(b) Articles 26(1)(c)(i)(2)	Reference to consultation document(s). Chapter 30, Table 11         mentary revenue recovery charge: Information on commodity-based transmission tariffs referred to in tag:         [A]       The manner in which they are set.         ARERA proposes a complementary revenue recovery charge, levied for the purpose of managing revenue under- and over-recovery, applied to exit points other than interconnection points.         Reference to consultation document(s). §19.5 and §19.6         [B]       The share of the allowed or target revenue forecasted to be recovered from such tariffs.         The share of transmission service revenue (allowed or target revenue) to be recovered by complementary revenue recovery charges is not assessable at the moment, given that reconciliation of past accounts will take
Articles 26(1)(c)(i)(1) 4(3)(b) Articles 26(1)(c)(i)(2) 4(3)(b)	Reference to consultation document(s). Chapter 30, Table 11         mentary revenue recovery charge: Information on commodity-based transmission tariffs referred to in at (3):         [A]       The manner in which they are set.         ARERA proposes a complementary revenue recovery charge, levied for the purpose of managing revenue under- and over-recovery, applied to exit points other than interconnection points.         Reference to consultation document(s). §19.5 and §19.6         [B]       The share of the allowed or target revenue forecasted to be recovered from such tariffs.         The share of transmission service revenue (allowed or target revenue) to be recovered by complementary revenue recovery charges is not assessable at the moment, given that reconciliation of past accounts will take place in capacity-based tariffs for 2020 (§27.7), and future accounts will only be known after 2020.
Articles 26(1)(c)(i)(1) 4(3)(b) Articles 26(1)(c)(i)(2) 4(3)(b) Articles	Reference to consultation document(s). Chapter 30, Table 11         mentary revenue recovery charge: Information on commodity-based transmission tariffs referred to in tag:         [A]       The manner in which they are set.         ARERA proposes a complementary revenue recovery charge, levied for the purpose of managing revenue under- and over-recovery, applied to exit points other than interconnection points.         Reference to consultation document(s). §19.5 and §19.6         [B]       The share of the allowed or target revenue forecasted to be recovered from such tariffs.         The share of transmission service revenue (allowed or target revenue) to be recovered by complementary revenue recovery charges is not assessable at the moment, given that reconciliation of past accounts will take
Articles Articles 26(1)(c)(i)(1) 4(3)(b) Articles 26(1)(c)(i)(2) 4(3)(b)	Reference to consultation document(s). Chapter 30, Table 11         mentary revenue recovery charge: Information on commodity-based transmission tariffs referred to in at(3):         [A]       The manner in which they are set.         ARERA proposes a complementary revenue recovery charge, levied for the purpose of managing revenue under- and over-recovery, applied to exit points other than interconnection points.         Reference to consultation document(s). §19.5 and §19.6         [B]       The share of the allowed or target revenue forecasted to be recovered from such tariffs.         The share of transmission service revenue (allowed or target revenue) to be recovered by complementary revenue recovery charges is not assessable at the moment, given that reconciliation of past accounts will take place in capacity-based tariffs for 2020 (§27.7), and future accounts will only be known after 2020.
Articles 26(1)(c)(i)(1) 4(3)(b) Articles 26(1)(c)(i)(2) 4(3)(b) Articles	Reference to consultation document(s). Chapter 30, Table 11         mentary revenue recovery charge: Information on commodity-based transmission tariffs referred to in at (3):         [A]       The manner in which they are set.         ARERA proposes a complementary revenue recovery charge, levied for the purpose of managing revenue under- and over-recovery, applied to exit points other than interconnection points.         Reference to consultation document(s). §19.5 and §19.6         [B]       The share of the allowed or target revenue forecasted to be recovered from such tariffs.         The share of transmission service revenue (allowed or target revenue) to be recovered by complementary revenue recovery charges is not assessable at the moment, given that reconciliation of past accounts will take place in capacity-based tariffs for 2020 (§27.7), and future accounts will only be known after 2020.
Articles 26(1)(c)(i)(1) 4(3)(b) Articles 26(1)(c)(i)(2) 4(3)(b) Articles 26(1)(c)(i)(3)	Reference to consultation document(s). Chapter 30, Table 11         mentary revenue recovery charge: Information on commodity-based transmission tariffs referred to in at(3):         [A]       The manner in which they are set.         ARERA proposes a complementary revenue recovery charge, levied for the purpose of managing revenue under- and over-recovery, applied to exit points other than interconnection points.         Reference to consultation document(s). §19.5 and §19.6         [B]       The share of the allowed or target revenue forecasted to be recovered from such tariffs.         The share of transmission service revenue (allowed or target revenue) to be recovered by complementary revenue recovery charges is not assessable at the moment, given that reconciliation of past accounts will take place in capacity-based tariffs for 2020 (§27.7), and future accounts will only be known after 2020.

Articles	[A]Non-transmission service tariff methodologies;
26(1)(c)(ii)(1)	
4(1)	
	There are two non-transmission tariffs to cover for the metering service:
	<ul> <li>(i) A capacity-based tariff (<i>CM<sup>T</sup></i>) applied to all delivery points in the system, to cover for the cost of meter and meter reading on the transmission network; it is determined as the ratio between CAPEX+OPEX and forecasted contracted capacity at delivery points. The tariff is a single tariff at national level, with a compensation mechanism between TSOs.</li> <li>(ii) A capacity-based tariff (<i>CM<sup>CF</sup></i>) applied only to delivery points where the metering facility is owned by the TSO (instead of the final customer), to cover for the cost of the metering activity on such delivery points; it is computed as the ratio between CAPEX+OPEX related to such meter activity and forecasted contracted capacity on such delivery points.</li> </ul>
	Reference to consultation document(s). Chapters 24 and 25
Article	<b>[B]</b> Share of the allowed or target revenue forecasted to be recovered from such tariffs;
26(1)(c)(ii)(2)	
	Share of the allowed or target revenue forecasted to be recovered from non-transmission service tariffs: 2%
	share of the anowed of target revenue forceased to be recovered from non-framsmission service tariffs. 270
	Reference to consultation document(s): Chapter 30, Table 11
Article	[C] The manner in which the associated non-transmission services revenue is reconciled as referred
26(1)(c)(ii)(3)	to in Article 17(3);
17(3)	
	ARERA proposes the introduction of a specific reconciliation account for the metering service (called $FC^{M}$ ), in order to compensate for the differences (if any) between reference metering service revenues in year y and
	actual metering service revenues for the same year.
Article	<ul> <li>[D] Indicative non-transmission tariffs for non-transmission services to network users;</li> </ul>
26(1)(c)(ii)(4)	
	The indicative <i>CM<sup>T</sup></i> tariff for year 2020 is 0.0903 €y/Scm/day. The <i>CM<sup>CF</sup></i> tariff will be determined following further analysis by ARERA, concerning in particular the assessment of the costs borne by the TSO for such activity.
	Reference to consultation document(s): § 25.2; Chapter 30, Table 14

## [D] COMPARED TARIFFS AND TARIFF MODEL [ART. 26(1)(D)]

### [11] The indicative information set out in Article 30(2)

The comparison should be based on indicative reference prices. Whenever the data necessary for this comparison is not available at the time of the consultation on the RPM (e.g.: multipliers and seasonality), provide the date and the source where the information will be available.

	[A]Comparison between transmission tariffs applicable for:	
Articles	<ul> <li>prevailing tariff period, and for</li> </ul>	
26(1)(d)	<ul> <li>tariff period for which the information is published.</li> </ul>	
30(2)(a)(i)	Explain the difference between the level of transmission tariffs	
	The comparison is shown in Table 12 (Chapter 31). The difference in the level of transmission tariffs approved for the year 2019 and the indicative rates for the year 2020 largely depends on the adoption of a different RPM (the matrix methodology for the year 2019, the CWD methodology for the year 2020). Unlike the matrix methodology currently used, the CWD methodology assigns, being equal the distance, the same weight to all the routes between entry points and exit points. The reason is that it does not consider (i) the different unit investment cost associated with the relevant pipelines on a given route; (ii) the allocation of a reduced cost share for the pipeline sections which, in the relevant flow scenario, are backhaul. As a consequence, the allocation of costs between points changes, in particular resulting in a convergence of reference prices towards the average value. Reference to consultation document(s). Chapter 31, Table 12.	Comparison with past tariff period
Articles 26(1)(d)	<ul> <li>[B] Comparison between transmission tariffs applicable for</li> <li>tariff period for which the information is published, and for</li> </ul>	
30(2)(a)(ii)	each tariff period within the remainder of the regulatory period.     Estimated difference in the level of transmission tariffs.     The current tariff period ends in 2019, hence refer to the previous answer (11.A).	Comparison with upcoming tariff periods
	Estimated difference in the level of transmission tariffs.	upcoming tariff periods Tariff model for prevailing tariffs and
30(2)(a)(ii) Articles 26(1)(d)	Estimated difference in the level of transmission tariffs.         The current tariff period ends in 2019, hence refer to the previous answer (11.A).         [C] At least a simplified tariff model, updated regularly, enabling network users to calculate the transmission tariffs applicable for the prevailing tariff period and to estimate their possible evolution beyond such tariff period.         The simplified model will be made available by the TSO Snam Rete Gas, in a dedicated section of its website. ARERA will also provide the link on the consultation webpage.         Reference to consultation document(s). §33.1         Link to information on TSO/NRA website. www.snam.it	upcoming tariff periods Tariff model for prevailing tariffs
30(2)(a)(ii) Articles 26(1)(d)	Estimated difference in the level of transmission tariffs.         The current tariff period ends in 2019, hence refer to the previous answer (11.A).         [C]       At least a simplified tariff model, updated regularly, enabling network users to calculate the transmission tariffs applicable for the prevailing tariff period and to estimate their possible evolution beyond such tariff period.         The simplified model will be made available by the TSO Snam Rete Gas, in a dedicated section of its website. ARERA will also provide the link on the consultation webpage.         Reference to consultation document(s). §33.1	upcoming tariff periods Tariff model for prevailing tariffs and
30(2)(a)(ii) Articles 26(1)(d) 30(2)(b) Articles 26(1)(d)	Estimated difference in the level of transmission tariffs.         The current tariff period ends in 2019, hence refer to the previous answer (11.A).         [C] At least a simplified tariff model, updated regularly, enabling network users to calculate the transmission tariffs applicable for the prevailing tariff period and to estimate their possible evolution beyond such tariff period.         The simplified model will be made available by the TSO Snam Rete Gas, in a dedicated section of its website. ARERA will also provide the link on the consultation webpage.         Reference to consultation document(s). §33.1         Link to information on TSO/NRA website. www.snam.it	upcoming tariff periods Tariff model for prevailing tariffs and
30(2)(a)(ii) Articles 26(1)(d) 30(2)(b) Articles 26(1)(d)	Estimated difference in the level of transmission tariffs.         The current tariff period ends in 2019, hence refer to the previous answer (11.A).         [C]       At least a simplified tariff model, updated regularly, enabling network users to calculate the transmission tariffs applicable for the prevailing tariff period and to estimate their possible evolution beyond such tariff period.         The simplified model will be made available by the TSO Snam Rete Gas, in a dedicated section of its website. ARERA will also provide the link on the consultation webpage.         Reference to consultation document(s). §33.1         Link to information on TSO/NRA website. www.snam.it         Explanation of how to use the simplified tariff model	upcoming tariff periods Tariff model for prevailing tariffs and

# **[E]** FIXED PAYABLE PRICE UNDER PRICE CAP REGIME [ART. 26(1)(E)]

[12] Where the fixed payable price referred to in Art.24(b) is offered under a price cap regime for existing capacity		
Article	[A]Provide proposed index	
26(1)(e)(i)		
	Not applicable.	
Article	[B] Provide proposed calculation for the risk premium	
26(1)(e)(ii)		

	Not applicable.
Article 26(1)(e)(ii)	[C] How is the revenue derived from the risk premium used?
	Not applicable.
Article 26(1)(e)(iii)	[D] At which IPs is such approach is proposed?
	Not applicable.
Article 26(1)(e)(iii)	[E] For which tariff period(s) is such approach proposed?
	Not applicable.
Article 26(1)(e)(iv)	<b>[F]</b> The process of offering capacity at an IPs where both fixed and floating payable price approaches referred to in Article 24 are proposed
	Not applicable.