



Spett.le ARERA  
Corso di Porta Vittoria 27  
20122, Milano

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**Subject:** ARERA consultation n.213/2022/R/gas – transportation tariffs 2024-2027

Shell thanks ARERA for outlining its orientations on the 6th tariff regulatory period and welcomes the opportunity to express its views.

We believe the general objectives of the regulatory action should aim at maximizing the efficiency of the Italian gas system, being it in terms of security of supply, competition, diversification of sources, tariff transparency and predictability. Shell is taking steps to verify the existence of conditions to further diversify imports and increase the availability of non-Russian gas. In this regard we would like to support the Italian Authorities (MiTE, ARERA) in outlining a regulatory framework that is able to allow operators to further enhance SoS of the Italian system.

**Proposed tariffs discounts on storage and LNG entry/exit points**

ARERA is proposing to increase the discount on entry/exit storage tariffs to 100% as well as to introduce a 50% discount at entry points from regasification terminals. The combined discount would result in an increase of +21% on the entry tariffs at interconnection points (IPs) other than storage and LNG and +9 % on exit tariffs compared to the fees approved for the year 2022.

Taking stock of the predicted impact, Shell believes that those discounts should not result in the increase of tariffs at the other IPs:

- i) First of all, increasing entry tariffs at other IPs would be detrimental to imports from pipelines and to the overall supply security
- ii) Second, LNG competes with gas from other sources and should not be given excessive and unjustified competitive advantages

Overall, securing supplies for the National system from all possible import routes should be privileged. Such tariff discounts on storage and LNG could instead be financed through existing levies charged downstream the PSV.

**Capacity allocation at city gates**

ARERA is proposing the potential introduction of daily capacity bookings to which a multiplier between 2.5 and 3 would be applied: it is unclear how this would match the logic of automatic allocation of capacity foreseen by the reform of capacity bookings at the redelivery points, which is going to be implemented from 1 October 2023 as provided for by Resolution 225/2022/R/gas. We would welcome a clarification with this respect.

That said, we support the introduction of daily capacity bookings for direct industrial customers.

#### Denomination of potential new fees

Whether new variable components will be introduced, we highlight the need to make clear and intuitive for all market players at which points of the system the new components would apply and make their denomination consistent with the tariff structure in use e.g. always including the term "R" to indicate the application of the fee at redelivery points.