



Eni S.p.A. Zweigniederlassung Deutschland

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Via email: Marktgebiete@bnetza.de

Subject: **File reference BK7-16-050 - Adaptation proceedings on the determination of the ruling chamber to introduce a gas quality conversion system in quality overlapping market areas** (hereinafter: Konni Gas)
[Verfahren zur Änderung der Festlegung zur Einführung eines Konvertierungssystems in qualitätsübergreifenden Marktgebieten]

Eni would like to thank Bundesnetzagentur (hereinafter BNetzA) for the possibility to comment on the above-mentioned adaptation proceedings.

Eni acknowledges the importance of a stable and reliable L-Gas supply to Germany and its L-gas final customers and understands both German market area managers (hereinafter MAMs) worries regarding the impacts on the conversion costs of the expected further decline in the Dutch and domestic L-Gas production, combined with a demand for L-Gas in Germany that will decline at a much lower rate.

However, Eni deems that a stable and reliable regulatory framework is of great importance for a fair and well-functioning gas market. Like other market players, Eni has based its commercial plans relying on the melting down of the conversion fee as scheduled in the Konni Gas decision. Taking into account that gas supply contracts usually are closed with a certain lead-time, an unexpected prolongation of the conversion fee will reduce the confidence in the German regulatory framework.

Besides, Eni wonders if the prolongation of the conversion fee is the right measure to incentivize shippers to import the L-Gas quantities necessary to supply their L-Gas customers. With regard to a solution other than a prolongation of the conversion fee, Eni shares the proposals made by BDEW.

In addition, Eni believes that revenues/losses of the MAMs shall not be recovered through a levy at the physical entry points. This mechanism would provide unpredictability on the formation of the German hub price compared to other European hub prices, thus negatively affecting the liquidity and transparency of the German gas market. Furthermore, contracts already signed with final customers cannot be easily amended in order to recover this new levy, leaving Sellers exposed to a cost that was not foreseeable at the time of contracts signing. For these reasons, Eni considers it best to collect a quality conversion charge not at the entry points, but that potential losses of the MAMs shall be reimbursed instead with

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a charge that accrues at the domestic exit point, thus not altering the hub price formation mechanism.

We remain available for further discussions and thank you for the consideration of our remarks.

Kind regards



Düsseldorf, April 22nd 2016

Energy Regulation Expert D/A/CH

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