

## BK7-2

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**Von:** [REDACTED]  
**Gesendet:** Dienstag, 14. Juni 2022 18:18  
**An:** Speicherumlage  
**Cc:** Directeurs  
**Betreff:** Verfahren BK7-22-052 zur Genehmigung der Methodik zur Ausgestaltung der Umlage nach § 35e EnWG

Sehr geehrte Damen und Herren,

The “Commission pour la Régulation de l’Electricité et du Gaz” (CREG) welcomes the opportunity to react to your consultation with reference BK7-22-052 about “Genehmigung der Methodik zur Ausgestaltung der Umlage nach § 35e EnWG”.

We understand that in the concept presented by THE, the projected costs concern on the one hand, the costs for contracting the SSBO and, on the other hand, the procurement of the physical gas and the storage capacities required for it.

We also understand that it is proposed to allocate the costs in relation to the daily physically withdrawn quantities at SLP exit points, RLM exit points and cross-border points or virtual interconnection points.

As such, this allocation would burden customers in other Member States, in addition to the costs incurred in the respective Member State to meet its own storage obligations, which is unjustified.

Therefore, the proposal for a Regulation of the European Parliament and of the Council amending Regulation (EU) 2017/1938 with regard to gas storage  
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foresees in article 6b(1)(j) that:

“collecting the revenues needed to recover the capital and operational expenditures related to regulated storage facilities as storage tariffs and a dedicated charge incorporated into transmission tariffs, collected only from exit points to final customers located within the same Member States.”

As a consequence, we object to the proposed allocation and we ask that cross-border points and virtual interconnection points will be excluded from the allocation to be decided by BNetzA.

Yours faithfully,

i.A.



Principal advisor

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