

Dear all,

Reference is made to the ERGEG Public Consultation Paper on the Principles on Calculation Tariffs for Access to Gas Transmission Networks (reference E07-CBT-01-03 - dated 22-November-2007).

As SPE, we would like to submit following comments on this paper:

- As is the case e.g. in France, SPE would recommend to limit long term capacity subscription (both for entry as for transit) to about 80% of available capacity. This would still allow new entrants, that did not get the opportunity to subscribe long term capacity, to enter the market without to much disadvantages and would therefore enhance competition. Of course Transporters should not financially be penalised for suboptimal use of their grids for this reason.
- Transporters and market parties (e.g. by a "Use It Or Loose It" principle) should have an incentive to increase liquidity on the secondary market.
- Backhaul flows : should remain interruptible service - a (specific) shipper should not receive financial incentives to maintain a minimal physical flow in order to guarantee a backhaul flow.

Kind regards,

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