Summary of answers to the consultation (Art. 26 of Commission Regulation (EU) 2017/460)			
From	Confidential?	Topic	Responses by Stakeholders
FEBEG	NO	Transparency	FEBEG would like more transparency and a more robust assessment of the tariff methodology, including a sensitivity simulation without the contribution from the regulatory account.
		Transparency	Fluxys BE should provide a cost allocation assessment including sensitivities and give more information on the forecasted contracted capacities to allow market parties to forecast future levels of tariffs (2024-2027), in order to reduce the risks for market participants.
		Domestic exit tariff	FEBEG pleads to modify the way transport costs are passed on to the distribution grid users. Therefore, they propose to introduce a uniform fixed tariff in EUR/year.
		Regulatory account	It would be better that the surpluses on the regulatory accounts are as soon as possible redistributed to the market to avoid discrimination between grid users.
		Extra	FEBEG also proposes that in case of excess IUK revenues by IUK, a certain amount should be integrated into Fluxys Belgium and contribute to the allowed revenue.
		Tariffs	Apart from the abovementioned cost allocation assessment and sensitivity analysis, market parties should also be made aware of the expected tariff increase in 2024 for entry and domestic exit. Backhaul tariff at unidirectional points' and the 'Fix/flex tariff for CCGT should also be added to the tariff proposal.
EDF Luminus	NO	Transparency	EDF Luminus aks for more transparency and calls to fully disclose the cost allocation assessment completed with a sensitivity analysis based on other scenarios for the forecast of contracted capacity on entry and exit points as well as domestic and interconnection points.
		Domestic exit	EDF Luminus has concerns on the fact that the 5% increase for combined use of entry and domestic exit will increase to around 25% from 2024 when no regulatory account can be used. They state that for domestic use (e.g. power plants) this can become dangerous as they will become less competitive compared to alternatives. Therefore EDF Luminus asks Fluxys to review the assumptions as currently applied within the CWD methodology (as they only see benifits for transit from the return of regulatory account), taking into account the longer than 4 years effects, reducing the sensitivity for other scenarios and aiming at redistributing more evenly between transit and domestic use.
ENGIE	NO	Entry/exit tariffs	Engie has a comment on the treatment of L-Gas points. For calculating the tariffs, Engie suggests that the equalization for all entries should be calculated with reference prices expressed in energy units per unit of time.
			Engie has a comment on the lack of reflection of actual costs. Engie proposes to adapt the CWD methodology by adding discount factors on each exit points to other countries to reflect the level of amortization of the corresponding pipelines.
EFET	NO	Transparency	EFET supports that the CWD methodology is chosen to derive tariffs for 2020 – 2023. However, they would have liked to see analysis carried out using other methodology's so that network users could get a better understanding of why the CWD methodology was chosen.
		Entry/exit tariffs	EFET also suggests to maintain tariff stability and predictability where possible, by maintaining the current 30:70 split rather than 33:67.
		Regulatory account	EFET also finds €100 million a significant number to have in the regulatory account. They rather see part of the amount returned to the shippers that contributed to the over-recovery

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EDF	NO	OCUC tariffs	In order to better balance the supply diversification in Europe and reinforce the security of supply, it is important to encourage the attractiveness of the LNG in Belgium, therefore EDF suggest that the discount applicable to the Dunkirk LNG to Zeebrugge OCUC should be at least equal to Zelzate-Zeebrugge discount, and at least equal to 32%.
Eni SpA	NO	Regulatory account	ENI supports the change in the cost allocation methodology being proposed by Fluxys. However, according to ENI, the regulatory account of €100 million should be significantly lower by 2023, if not at zero, in order to avoid any temporal cross-subsidy. They refer to the fact that the sunk costs unduly paid by the shippers, have also contributed to the amount on the regulatory account currently held by Fluxys.
		Storage tariff	They also suggest to stick to the 50% discount provided by the EU Network Code for both entry and exit tariffs from/to storage.
Febeliec	NO	Entry/exit tariffs	Febeliec hopes this split will evolve further to the 50/50-level suggested by the NC TAR and invites Fluxys to propose a medium-term planning for this purpose.
		Regulatory account	Febeliec appreciates that 240 million euros are used to reduce tariffs in the next tariff period. Febeliec does however not fully understand the reasoning behind the reservation of 100M€ for future investments "to absorb future shocks".
		Domestic exit tariff	They also insists on a balanced approach, where domestic users get a fair share of the surpluses on the regulatory accounts.
		Domestic exit tariff	Febeliec is surprised by the substantial difference in the cross-subsidisation index between 2020 (0,12%) and 2021-2023 (between 3,19 and 3,63%) and invites Fluxys to explain these differences more in detail.
OMV Gas Marketing & Trading GmbH	NO	Tariffs	OMV Gas would like to gain a better understanding as to what type of analysis was made to conclude that a discount related to LNG transmission capacity is not considered. The distance component for OCUC is, in their view, already fully reflected by using the CWD approach and therefore an additional distance-based discount on OCUC products seems unjustified for them.
		Regulatory account	OMV Gas asks Fluxys to outline the predicted investment scheme (projects, infrastructure etc.) so that the intended "over-recovery" can be explained and thus justified.
		Entry/exit tariffs	OMV Gas recommends to continue the application of the 30/70 split instead of 33/67.
Shell Energy Europe Limited	NO	Transparency	SEEL supports the application of the CWD methodology, but it suggests an open and transparent consultation with a comparison within the consultation document, detailing the impact on tariff levels for each network point, depending on the tariff methodology chosen, compared to the status quo.
		Entry/exit tariffs	SEEL also states that it is not clear why an entry/exit split of 33/67 is proposed, compared to the current split of 30/70. They say that a proposed change to the entry/exit split leads to an increase in entry tariffs of 3% that could also have a consequential impact on ZTP prices.
		Regulatory account	As last, to avoid cross-subsidisations, SEEL wants to see the remaining €100m being returned to and apportioned to those network users that paid for it.