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OMV Downstream

Vienna, 12 February 2020

**Public consultation on Draft project proposal for incremental capacity
between the entry-exit systems of the Czech Republic ('CZ') and the
Austrian Market Area East ('AT')**

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OMV Refining & Marketing GmbH
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Dear Ladies and Gentlemen,

Registered at:
Company Court Wien
Company Registration No. 185462 p
Registered Office: Vienna
VAT No. ATU48359903

Within the consultation of the Incremental capacity procedure, we'd like to take the opportunity to share our comments.

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In future due to the developments in our region gas is expected to flow not only East - West and West - East but also North - South and South - North. We therefore see a strong need to enhance the gas transportation network along this flow direction and we are convinced that there is enough demand to commercialize this route. The Czech-Austrian incremental capacity project is a promising opportunity for both the Czech and the Austrian market.


We believe that the interconnector will increase security of gas supply for both gas markets.

Comments on draft project proposal	
Section	Comment
F	The shippers booking the capacity in the incremental capacity auction and by that allowing the interconnector to pass the economic

	test (the enablers of this pipeline), shall not be discriminated with a higher tariff against the shippers which may book capacity in later yearly auctions. The tariff methodology should foresee that any bookings in later auctions shall be at the same overall tariff including all supplements, if any, and other costs as borne by the enabling shippers.
G	OMV supports the proposed F factor:1 The project shall be commercial itself solely based on the allocated capacity and the applicable tariff, hence the cost of the project shall not be subsidized by any other entry & exit points.

We support TSO's conclusion to initiate an incremental capacity process with bundled capacity products with 2 offer levels of 750,000 Nm³/h (0°C) per year and 210.000 Nm³/h (0°C) per year.

Yours sincerely,


Reinhard Mitschek


Bernd Kapferer