

**EREGG Public Consultation
on Guidelines on Transmission Tarification¹
- Evaluation of the Comments Received -
18-07-2005**

INTRODUCTION

This document contains the evaluation by EREGG of the comments received during the EREGG public consultation² on Guidelines on Transmission Tarification (TT).

The public consultation was held between the 2nd May 2005 and the 24th June 2005. The purpose of the public consultation was to provide EREGG with the basis for the final proposal to the European Commission of the Transmission Tarification Guidelines, by considering as wide as possible scope of inputs and proposals from all interested parties.

On 30. June 2005, a public hearing was held by EREGG, to which all organisations and stakeholders that delivered comments during the public consultation were invited for presentation and discussion. The agenda and all presentations of the public hearing are available at www.ereg.org.

The comments provided in the public consultation have been evaluated in terms of applicability and consistency. For each comment, the following evaluation template has been used:

#	TT Guidelines reference	Original text of the comment	EREGG evaluation	EREGG explanation
<i>No. of comment</i>	<i>TT Guidelines section/chapter to which the comment refers to</i>	<i>original comment text</i>	<i>Yes (accept) or No (reject)</i>	<i>EREGG explanation (especially if rejected)</i>

The positively evaluated comments from public consultation, supplemented with additional inputs and clarifications from the public hearing, have been incorporated into

¹ Transmission Tarification Guidelines according to the Article 8 of the Regulation (EC) No 1228/2003 of the European Parliament and of the Council of 26 June 2003 on conditions for access to the network for cross-border exchanges in electricity

² Principles and rules for the EREGG public consultations are provided at www.ereg.org

the final ERGEG draft of the Transmission Tarification Guidelines. ERGEG has proposed this final draft to the European Commission as formal advice prior to the Comitology process necessary to approve final guidelines.

Section I of this document contains the evaluation of all the comments, organised according to the above mentioned template and to the organisations and stakeholders that responded. The reference text of the Transmission Tarification Guidelines is the one from the ERGEG public consultation. The comments have been quoted with their original format and contents as submitted by the organisations and stakeholders. The underlined text means new text proposed to be added, the ~~crossed text~~ means text that ERGEG proposed to be deleted.

Section II presents a short summary of the highlights of the public hearing from 30. June 2005.

Section III contains the additional modifications to the Transmission Tarification Guidelines, proposed by ERGEG following the public consultation and hearing, that were not delivered by any organisation or stakeholder, but were instead additionally recognised as needed and justified by ERGEG.

Finally, in the Annex in Section IV, the actual ERGEG proposal for the final draft of the Transmission Tarification Guidelines is enclosed.

This document is published at the ERGEG website www.ereg.org.

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SECTION I – EVALUATION OF COMMENTS RECEIVED IN THE PUBLIC CONSULTATION ON TRANSMISSION TARIFICATION GUIDELINES

I-1. AEP - ASSOCIATION OF ELECTRICITY PRODUCERS, GB				
No	Chapter/ section	Comment	Include (Yes/No)	EREGG Explanation
1		We agree with ERGEG that connection charges also need to be addressed.	N/A	No further actions in the present draft Guidelines, they will be considered at a later stage
2		The Association believes that significant trade distortions will occur unless there is some harmonisation of transmission charging approaches. However, while ERGEG acknowledges the need to harmonise the G charge in Section 2 para i, its proposals do nothing to achieve this, since they simply enshrine the status quo. There is no logical reason why charges in the United Kingdom should be significantly higher than charges in countries to which it is connected via submarine cables. In the Association's view, ERGEG's proposal is not consistent with Art. 8.3 of the Cross-Border Regulation, which requires the Guidelines to lead to "a progressive harmonisation of the underlying principles" for setting charges.	No	Taking the status quo of present charging structures is the first step for tariff harmonisation. That is, the spread of charges will not in future increase
3		The Association favours a harmonisation of the % split between generation and demand rather than of charging levels. The guidelines point out, that European countries vary according to how they calculate network charges. It would therefore be difficult to harmonise absolute charging levels in the short term. There is, however, no reason for not harmonising the	No	In order to guarantee a level playing field for generators in the IEM, the G charges should firstly be harmonised and this harmonisation should be realised in absolute values. Harmonisation of the split of charges would not contribute as effectively to the charges in the competitive part of

		split of charges.		IEM i.e. generators.
4	Explanatory note, section 1	The Commission's reference to border charges still existing within the EU market is accurate; one example is the "injection fee" payable by exporters from the UK to France. The Association believes that ERGEG should focus on removing such border charges rather than "skating over" the issue through careful drafting.	N/A (modified)	The paragraph will be clarified by noting that charges for traders for the underlying commercial arrangement have been removed for cross border trading for those places within the ITC mechanism.
5	Explanatory note, section 2 i	ERGEG rightly states that connection charges also need to be taken into account. However, the draft does not follow this through by recognising that the total charge (G + connection) paid by generators is the important factor.	No	Connection charges have to be taken into account when making generation investment decisions. A connection charge is paid when connection to the network is realised and it can be considered as an 'investment' type of charge. Depending on charging structures in place, these charges can be applied as locational signals. Locational signals will be considered in more detail at a later stage.
6	Explanatory note, section 2 i	The Association agrees with the statement that non-network-related charges are often important in siting decisions. However, this is not an argument for not harmonising the generation/demand split: differential costs for cooling water and fuel transportation costs arise from natural factors. Network charges, on the other hand, are administratively imposed and efforts should be made to reduce any distortions they produce.	No	Generation / demand split is not harmonised, only charge for generators
7	Guidelines 1.1	Analysis in the GB market has clearly shown that capacity usage at peak is the main driver of transmission investment. In this light, the Association believes that	No	It depends on the system if capacity or energy is the main driver of transmission investment. The total annual charges

		it would be more logical to base charging on capacity rather than energy flow.		paid by generators to their TSO take into account both capacity and energy payments. G charge represents the actual charges for feeding to the network, not only the reservation of capacity.
8	Guidelines 1.4	We believe that an average G charge of €2.5/MWh for the UK, which is far higher than for any other Member State except Ireland, is inequitable. The €2.5/MWh figure cannot be justified on the basis of providing locational signals within the UK, since charges on individual generators can be set above and below the average. Such a figure, which represents 6-8% of the wholesale price, would significantly distort cross-border trade, and would not provide a level playing field for UK generators. The ERGEG figure is also considerably higher than that estimated by the European Commission.	No	The figure corresponds to the expected situation in the UK and Ireland (average charge for generators), and allows for currency risk and present efforts to create an All-Island electricity market from the Republic of Ireland and Northern Ireland markets..
9	Guidelines 3	We do not understand why the timetable is so unambitious: regulators are effectively given eighteen months simply to calculate the G charge. In contrast, the Congestion Guideline, which requires major changes to existing practice, gives one year (to 1st January 2007) to introduce coordinated capacity allocation. We do not see why regulators could not provide an average G figure by early 2006.	No	Reporting is synchronised with other reporting duties from regulators (by end of July). Guidelines are in effect from 1.1.2006 and the year 2006 is the first year for which annual G charge is to be calculated based on the Guidelines.
I-2. EBL – NORWEGIAN ELECTRICITY INDUSTRY ASSOCIATION				
No	Chapter/section	Comment	Include (Yes/No)	EREGG Explanation

1		<p>Underlines the importance of future elaboration on the following issues:</p> <ul style="list-style-type: none"> • The creation of one tariff range for European generators to avoid distortion of competition. Norwegian generators are presently at the maximum level, 0,7 €/MWh, which is proposed for the Nordel area. • Harmonization of tariffication principles for both G and L charges on all voltage levels including locational signals at a European level. 	N/A (to be considered in next version of guidelines)	<p>Need for future harmonisation</p> <p>No further actions in the present draft Guidelines</p>
I-3. ETSO				
No	Chapter/section	Comment	Include (Yes/No)	EREG Explanation
1	Explanatory note, section 1	Finally, charges for traders relating to underlying commercial arrangements have been removed from January 2004 for cross border trading between Member States participating in the inter-TSO compensation mechanism	Yes	<p>Charges applied to traders have been removed but there is still transfer mechanism between TSOs.</p> <p>It is necessary to specify that the charges have been removed from cross border trading between Member States participating in the mechanism, since for energy coming outside the ITC mechanism the injection fee is still sometimes in place.</p>
2	Explanatory note, section 2i	The European countries Member States have also different practices according to whether a generator is responsible ...	Yes	In order to be more precise the term "Member States" should be used instead of European countries.

3	Explanatory note, section 2i	For each Member State, the average G charge will have to remain within the specified range, which should be transparently and non-discriminatory calculated for each country. <u>Member States will accordingly be able to have variations in charges for their internal regions (“national locational signals”)</u> . A positive G charge can be important e.g. for the financing of the inter-TSO compensations especially in heavily exporting countries.	Yes	To emphasise that it is left to each Member State to decide on the introduction of regional or “national locational signals”. The reintroduction of sentence from the 2004 draft is accepted.
4	Explanatory note, section 2ii	Under the Regulation all Member States will be required to participate in the inter-TSO compensation mechanism and to implement market based congestion management methods for the interconnectors <u>interconnection capacities</u> .	No (Modified)	ETSO sees that the use of the term interconnector may give grounds to think that congestion management methods could be applied to single lines and then discussions may arise since the fact is that congestion management methods can only be applied to the overall interconnection capacity resulting from all lines linking two countries. To clarify the text it should be modified to: Under the Regulation all Member States will be required to participate in the inter-TSO compensation mechanism and to implement market based congestion management methods. for the interconnectors.
5	Explanatory note, section 2ii	With market based capacity allocation <u>of interconnection capacities at interconnectors</u> , this price difference will be made explicit. Any new generation in surplus regions will therefore face either a low price for energy in	Yes	‘Interconnection capacity’ used instead of ‘interconnectors’

		their domestic market or a high allocation interconnector charge <u>for interconnection capacity</u> to sell in higher prices countries.		
6	Explanatory note, section 2ii	Charges <u>applied to generators</u> covering costs of losses and other ancillary services can give short-term locational signals and application of these charges is important for achieving an efficient operation of the network.	No	Charges can be applied both to generation and load.
7	Guidelines 1.1	The value of the 'annual national average G' is annual total transmission tariff <u>charges fees</u> paid by generators divided by the total measured energy injected annually by generators to the transmission network. Annual average G shall exclude any <u>charges fees</u> paid by generators for physical assets required for the generators connection to the system (or the upgrade of the connection) as well as any <u>charges fees</u> paid by the generators related to ancillary services or any specific network loss charges paid by generators.	Yes	"Charge" is used commonly in the Guidelines and should be used here instead of "fee".
8	Guidelines 1.1	The value of the 'annual national average G' is annual total transmission tariff charges paid by <u>all generators</u> divided by the total measured energy injected annually by <u>them generators</u> to the transmission network. Annual average G shall exclude any charges paid by generators for physical assets required for the generators connection to the system (or the upgrade of the connection) as well as any charges paid by the generators related to ancillary services or any specific network loss charges paid by generators.	No	ETSO considers that all generators, not only those connected to the transmission network, should be affected by the Guidelines – ETSO proposes that charges paid by all generators as well as amount of energy produced by them should be taken into account when calculating average national G. This would lead to creating a "level playing field" for all generators and avoid discrimination among generators connected to

				different voltage levels. Harmonisation of G charges should begin at the transmission level and continue at a later stage on other voltage levels when further investigations have been made.
9	Guidelines section 4 (new)	<u>Each year, before the end of October, the European Commission will prepare a public report on G values in Member States that shall contain the information supplied yearly by regulators. A first report will be published by 28 May 2006 detailing the charging structures reported by regulators before 28 February 2006.</u>	Yes (modified under section 3)	Report on G values should be prepared. The most efficient way of doing this is in the context of annual report from Commission Addition to the end of section 3 Reporting (no new section 4): <u>3.2 The Commission will publish G-values in Member States as a part of their annual reporting. The first reporting will occur by the end of year 2007 including also the charging structures.</u>
I-4. EURELECTRIC				
No	Chapter/section	Comment	Include (Yes/No)	EREG Explanation
1	Explanatory note, section 2i	Harmonisation of use of the system <u>network access</u> charges for generators	Yes	According to the Regulation harmonisation shall be applied to charges for access to network
2	Explanatory note, section 2i	To avoid distortions of competition, some harmonisation of the charges for access to networks of the generators, i.e. 'G' charge is <u>needed</u> desirable .	Yes	"Needed" is stronger than "desirable".
3	Explanatory note,	Tariff structures and charging principles may vary widely from	No	According to Eurelectric the harmonisation of G

	section 2i	<p>country to country but also within a country depending on voltage level and region. It is therefore proposed that <u>basic G charges will be harmonised. This basic G charge corresponds to the charge paid by generators for access to the grid but does not comprise locational signals. It however remains possible for Member States to introduce such signals at national level in addition to the harmonised basic G. at transmission level and on the basis of the national average level of the G charges. For each Member State, the average G charge will have to remain within the specified range, which should be transparently and non-discriminatory calculated for each country. A positive G charge can be important e.g. for the financing of the inter-TSO compensations especially in heavily exporting countries.</u></p>		<p>charges and inter-TSO compensation mechanism have and should have no link.</p> <p>Refer also to comments under ETSO point 3 and FSE point 1</p> <p>Addition to the Guidelines article 1.1 in order to clarify what is excluded when G charge is calculated:</p>
4	Explanatory note, section 2i	<p>Within the Nordel, UK and Irish systems, interconnected by DC submarine cables to UCTE, the main continental system, different ranges for the 'national average G' may be applied and the ranges will be re-examined in the later stage during the transitory period.</p>	No	<p>Transitory period and exact date shall not be defined in the Guidelines.</p>
5	Explanatory note, section 2i	<p>The need for harmonisation of G-charges on other voltage levels and harmonisation of tariff structures should be investigated also in the later stage.</p>	Yes	<p>Word "also" deleted in the text.</p>
6	Guidelines, name	<p>Proposal for change the name in page 4</p> <p>ANNEX: DRAFT GUIDELINES</p> <p>to</p> <p>GUIDELINES ON</p>	Yes	<p>After accepting the change, these guidelines are consistent with guidelines on congestion management.</p>

		TRANSMISSION TARIFICATION		
7	Guidelines 1.2	<u>During the transitory period ending on 31.12.2008, the value of the 'annual national average G' must be within a range of 0 to 0.5 €/MWh, with the exception of the cases in 1.3 to 1.5 below.</u>	No (modified)	A transitory period is not given. If we want to include such a period then it would have to be consistent with the time schedules to merge regions e.g. congestion management guidelines. Addition to the Guidelines 1.2 to clarify 1.3 – 1.5: The value of the 'annual national average G' must be within a range of 0 to 0.5 €/MWh, with the exception of the maximum values stated cases in 1.3 to 1.5 below.
8	Guidelines 1.3	The value of the 'annual national average G' within the Nordel system shall be within the range of 0.25 to will be at a maximum of 0.7 €/MWh.	Yes	To make the Nordel area consistent with other areas, lower G values than actually existing are permitted.
9	Guidelines 1.4 & 1.5	The value of the 'annual national average G' within the GB system will be at maximum 2.5 €/MWh. The value of the 'annual national average G' within the Republic of Ireland and within Northern Ireland will be at maximum 2.5 €/MWh	No	The figure corresponds to the expected situation in the UK and Ireland (average charge for generators), and allows for currency risk and present efforts to create an All-Island electricity market from the Republic of Ireland and Northern Ireland markets.
10	Guidelines 1.6	Additional text in section 1.6 <u>At the expiry of the transitory period, the level of the harmonised 'basic G' charge – i.e. the charge imposed on generators for</u>	No	Harmonisation is made for national average G as a first step. A transitory period is not defined at this stage.

		<u>network access, which does not comprise locational signals - shall be set to zero.</u>		After study of the implementation of long term locational signals it is possible to see also if basic G is to be applied.
11	Guidelines 3	National Regulators shall provide the value of the annual national average G to the Commission by the end of January <u>July</u> 2007.	No	See AEP point 9 and ETSO point 9
I-5. FINNISH ENERGY INDUSTRIES				
No	Chapter/section	Comment	Include (Yes/No)	EREGG Explanation
1		Harmonisation of G-charge is essential in order to create a level playing field for electricity generation.	N/A	No further actions are proposed in the present draft Guidelines.
2		CM methods, provided that they are market based, are the most efficient and accurate way of giving locational signals for production and consumption.	N/A	No further actions are proposed in the present draft Guidelines,
3		Supports EREGG position not to introduce locational signals through guidelines on transmission tariffication.	N/A	No further actions are proposed in the present draft Guidelines,
I-6. FSE – ASSOCIATION OF ENERGY END USERS, DENMARK				
No	Chapter/section	Comment	Include (Yes/No)	EREGG Explanation
1		<p>The object of the harmonization is apparently to secure the lowest possible contribution from the generators to the costs of transmission networks.</p> <p>If no limitations are laid upon the height of the L-charges, the harmonisation of the G-charges will cause severe disturbances in the power market. Put into practice the missing proceeds from the G-charges are</p>	<p>N/A</p> <p>(ITC guidelines should consider some of these issues)</p>	<p>Regulators are regulating revenues/tariffs/rate of return of the TSO. This will also limit the L charge within a country.</p> <p>To guarantee a level playing field for generators in the IEM, the G charges should be harmonised and this harmonisation should be realised in absolute</p>

		<p>compensated for by increases of the L-charges.</p> <p>This is obvious from the situation in Denmark, where the location of the power stations has caused heavy expenses to investments and operational costs concerning transmission plants.</p> <p>The straining of the prices has the consequence that the industrial companies are receiving the wrong signals on localization cf. the figures above concerning Eastern Denmark. Despite a considerable excess of power capacity in the area, a charge of 9,5 €/MWh is collected for load, while the collection for generation is only 0,3 €/MWh.</p> <p>The low G-charges have small influence upon localization of power stations, and in the case where they have importance they give signals which are in the opposite direction to the social optimal signals. The low G-charges in Denmark expresses that the Danish electricity consumers are subsidizing the power export.</p>		<p>values.</p> <p>However, when considering inter-TSO compensations, countries could for example adjust the costs to those utilising the network e.g. in heavily exporting countries most of compensation payments may be imposed on generators or compensations on external use of the network to be used to relief L charges.</p>
2		<p>FSE is suggesting that in stead of harmonizing the G-charge, the cost apportionment between load and generation is harmonized. As reasonable apportionment between load and generation we suggest that load and generation should cover 50% each.</p> <p>As a first step it could be laid down that the part of the generation should be at least 25%.</p> <p>25% is also the figure suggested</p>	No	<p>Load and generation covering 50% of each is not permitted according to the Regulation 1228/2003, because it requires that the proportion of the total amount of the network charges borne by producers shall be lower than the proportion borne by consumers.</p> <p>To guarantee a level playing field for generators in the IEM the</p>

		by IFIEC-Europe.		<p>G charges should first be harmonised and this harmonisation should be realised in absolute values. Harmonisation of the split of charges would not contribute as effectively to the charges in competitive part of IEM i.e. for generators.</p> <p>(see also AEP point 3 and 6)</p>
I-7. SCOTTISH AND SOUTHERN ENERGY, GB				
No	Chapter/section	Comment	Include (Yes/No)	EREGG Explanation
1		We believe that there should be a general harmonisation of the split of charges between generation and demand for network access. It would be difficult to achieve tariff harmonisation in the short term but at least a harmonisation of this percentage split should be possible.	No	See e.g. AEP point 3
2		In the initials steps ERGEG propose setting maximum national average "G" charges in the range of 0 to 0.5 /MWh with exceptions in some areas, specifically Nordel, GB and Ireland. It is not clear why these should be excluded, since doing so simply perpetuates any existing distortions. There may be reasons for the charges to initially be in this range so as to avoid step changes to charges, but we believe that a timetable should be set to bring this in line with the levels in the rest of Europe.	No	Harmonisation is started by freezing the present situation in order to limit the further spread of charges. The exact time table cannot yet be set but these issues need further investigations concerning tariff structures, locational signals and harmonisation to all voltage levels. These studies shall start shortly.
3		We agree that additional locational signals at a European level are not necessary (or desirable) at this stage. Indeed, we believe that they should in principle never be	N/A	No further actions are proposed in the present draft Guidelines

		required provided that equitable arrangements for cross border congestion management can be developed.		
I-8. UCTE				
No	Chapter/ section	Comment	Include (Yes/No)	EREGEG Explanation
1	Explanatory note, section 1	<p>... and in some Member States the 'G' charge is zero</p> <p>is proposed to be replaced by</p> <p>... and the major part of the electricity produced in the IEM is subject to a G charge regime which may put G at or very near to zero.</p>	Yes	
I-9. STATNETT, NORWAY				
No	Chapter/ section	Comment	Include (Yes/No)	EREGEG Explanation
1		A harmonization of the 'G' charge in absolute values and not in relative shares of 'G' and 'L' for each Member State will contribute to a more level playing field. It is important that both generation and load have incentives to keep transmission costs low. Therefore, Statnett would like to emphasize the importance of having a G charge above zero.	No	Range is defined from 0 to maximum value (depends on region)
2		<p>Locational signals will contribute to a better utilisation of the grid and contribute to more efficient investments and hence lower transmission costs over time.</p> <p>Statnett agrees with the proposed guidelines that congestion management gives locational signals. We would also like to add</p>	<p>N/A</p> <p>(to be considered in next version of guidelines)</p>	<p>National locational signals can be used and they can be based on payments for losses.</p> <p>No further actions are proposed for the present draft Guidelines. Long term locational signals will be considered at a later</p>

		that locational signals could be given by a tariff that includes marginal loss payment. A tariff that includes a marginal loss fee will therefore, like congestion management, give both a short term and long term signal.		stage
I-10. VEÖ – AUSTRIAN ASSOCIATION OF ELECTRICITY INDUSTRY				
No	Chapter/section	Comment	Include (Yes/No)	EREG Explanation
1		For ensuring a competitive marketplace without distortions, there should be explicitly strived for a harmonisation of the generation component (G-charge) within one control area as well as on European-wide level – as it is already mentioned in item 1.8 of the Congestion Management Guidelines and in items 1 & 2 of the Guidelines on Transmission Tarification, related to Art. 4 of Regulation 1228/2003.	N/A (to be considered in next version of guidelines)	Need for future harmonisation No further actions are proposed for the present draft Guidelines.

SECTION II – SUMMARY OF HIGHLIGHTS FROM THE PUBLIC HEARING ON 30. JUNE 2005

The public hearing on the Transmission Tarification Guidelines, was held on 30th June 2005. The participants of the public hearing expressed their agreement with the general goals and direction of the Transmission Tarification Guidelines and in particular their satisfaction that the public consultation and public hearing were organised in an open, transparent and productive way.

Some organisations that provided comments during the public consultation presented their comments and key points in detail:

- ETSO welcomed the new draft as positive step and stated that the proposal to harmonise the G charge is realistic and avoids dramatic changes to the tariffs in short term. Furthermore, ETSO proposed an improvement to the definition of G to include all generators regardless of the voltage level to which they are connected. In order to promote transparency, ETSO proposed that the Commission should publish a report on G values in Member States.
- Eurelectric urged the introduction of a stepwise approach to harmonisation where step one includes convergence of G values during a reasonable transitory period and step two includes harmonisation of Basic G (i.e. G without signals) to the same absolute value all over the EU. Eurelectric prefers Basic G=0, because it is simple, ensures a level playing field and can be easily combined with locational signals.
- EFET (no comments submitted to the written public consultation) indicated that they support the main principles and assumptions in the ERGEG draft. However, EFET stated the need to clarify guidelines about non-transaction based charging, in order to exclude in addition “special charges” to exporters and importers.

The full presentations by the organisations mentioned above are available at the ERGEG website, www.ergreg.org.

The discussion at the public hearing after the detailed presentation addressed among other things, the definition of both G and L, tarification harmonisation in the context of the ITC scheme and the adoption of transmission tarification guidelines at the same time as ITC guidelines.

All the related results from the discussions during the public hearing, together with the detailed explanations and clarifications from the actual presentations of the organisations mentioned above, have been analyzed and included in the final evaluation of all the comments in the Section I of this document.

SECTION III – ADDITIONAL MODIFICATIONS TO THE TRANSMISSION TARIFFICATION GUIDELINES

In this Section, additional modifications (some of them already marked light blue in Section I) to the Transmission Tarification Guidelines are listed, that were not proposed by any organisation or stakeholder in the public consultation, but that have instead been recognised as necessary and justified during the discussions and public hearing within ERGEG:

1. TT Guidelines, 1.2, modification of text: "The value of the 'annual national average G' must be within a range of 0 to 0.5 €/MWh, with the exception of the maximum values stated cases in 1.3 to 1.4~~5~~ below.
2. TT Guidelines, 1.4 and 1.5 have been merged to form a new 1.4. "The value of the 'annual national average G' within Great Britain, Northern Ireland, and the Republic of Ireland~~Great Britain, Republic of Ireland and Northern Ireland~~ will be at maximum 2.5 €/MWh."
3. TT Guidelines, 3.2, new text is included: "The Commission will publish G-values in Member States as a part of their annual reporting. The first reporting will occur by the end of year 2007 including also the charging structures".
4. TT Guidelines, Explanatory note, section 2ii, deletion of the following text in the end of first sentence. "for the interconnectors".
5. TT Guidelines, Explanatory note, section 2i modification of text: "Other non-network related cost factors, such as fuel transportation costs or availability of cooling water, may also ~~might~~ be important"

These additional modifications have been included in the final Transmission Tarification Guidelines draft text in Section IV.



**SECTION IV – ANNEX – EREGG PROPOSAL OF THE FINAL TRANSMISSION
TARIFICATION GUIDELINES**

[here, the final Guidelines Draft proposed by EREGG to the EC will be included]