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**Προς:** Κεντρικό Πρωτόκολλο

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**Θέμα Εγγράφου:** RAWEW consultations on DESFA and ICGB proposals (I-350855/23.05.2023 and I-350555/17.05.2023)

Edison welcomes RAWEW's Consultation Process and appreciates the possibility of submitting its own comments regarding DESFA and ICGB proposal for the auctioning of transmission capacity. However, for future consultation processes we strongly recommend RAWEW to grant appropriate information and time to stakeholders to analyze documentation in order to express their position.

With reference to DESFA and ICGB letters, here below some comments:

- From the start of commercial operation of the FSRU Alexandroupolis, IP with TAP and IP with DESFA will be competing at Komotini to enter ICGB. We believe it is important for an ICGB user to have the right to change entry point between the IP with TAP and with DESFA in a very flexible way. This will allow market participants to take full advantage of the synergy between gas facilities and will increase the security of supply and ensure diversification of the sources and routes not only for Bulgarian but also for neighboring gas markets.
- Edison wonders, however, about the pricing method that will be applied to a pair of Coupled Points. Indeed, the establishment of a corresponding pair of Coupled Points as follows: Entry Point "Amphitrite" - Exit Point "Komotini-DESFA/ICGB" will allow shippers to ship gas only from the FSRU Alexandroupolis to ICGB. This dedicated route service that will be offered differs from a postage stamp service. Edison expects this to be reflected in the tariff.

We are available for any clarification you may need.

Kind Regards

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