

## Energy Traders Europe comments to the Gas Supply Standard Ordinance

### Ordinance

With respect to the proposed amendments to the Gas Supply Standard Ordinance (GVSV), Energy Traders Europe would like to ask for additional clarifications regarding the way through which compliance with the new provisions will be verified. While we understand and support the efforts of Austria to diversify the gas supplies, we would like to make sure that our Members have the ability to evidence compliance with any related requirements.

The existing legislation in Austria envisages lower storage obligations for suppliers of end customers, who can evidence non-Russian origin of the gas they are required to hold in storage. Under the consulted proposal, the origin of this gas needs to be confirmed in accordance with the provisions envisaged under Regulation (EU) 2022/2576, originally designed for users of AggregateEU. In other words, we understand that the obligation is met, when the obliged entity submits a “declaration of honour” in writing for the entire volume it is required to hold in storage according to Section 121 paragraph 5a of the Gas Industry Act. We would like to confirm that our understanding is correct. If it is not, we would appreciate a detailed explanation of how the origin of gas should be evidenced, trusting that the same methodology is set to apply to different forms of gas acquisition.

### Contact

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