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per Energia Reti e Ambiente

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Comments on Consultation 198/2026/R/gas

Dear Sir or Madam,

Transitgas AG would like to thank ARERA for the opportunity to comment on the consultation document (198/2026/R/gas) published on June 3, 2026, regarding the implementation of the proposed “Servizio di liquidità” and market integration between the Italian and German gas markets via Swiss infrastructure.

As is well known, Transitgas AG’s transmission capacity is allocated on a long-term basis to its lessees, Swissgas and FluxSwiss GmbH. FluxSwiss GmbH is primarily responsible for marketing this transmission capacity for transit, while Swissgas is primarily responsible for marketing transmission capacity for imports and supply to Switzerland. The Servizio di liquidità therefore primarily concerns the lessees of Transitgas AG, who are taking a corresponding position on the matter.

As the pipeline owner and physical operator, it is of central importance to Transitgas AG that the implementation of the “Servizio di liquidità” does not interfere with Transitgas AG’s ability to carry out its activities in connection with these operator obligations. Therefore, Switzerland’s sovereignty, its legal framework, security of supply—particularly for Swiss customers—and compliance with existing long-term contracts must be guaranteed.



This includes the requirements set forth in Transitgas AG's concession provisions. According to these provisions, Transitgas AG must ensure that, for the duration of the concession, the transmission capacity necessary to meet Switzerland's current and foreseeable future natural gas demand is available.

It must also be ensured that adequate utilization and long-term transport security are guaranteed at all times, so that the necessary investments can be justified and implemented. In particular, Transitgas AG must be able to carry out the maintenance and repair work necessary for the long-term preservation of its natural gas pipeline system at any time.

Transitgas AG