



Injection tariffs: points of orientation

17 February 2026

AgNes determination proceedings

1. Introduction

The Bundesnetzagentur's Grand Ruling Chamber for Energy opened proceedings for the determination on the general electricity network tariff system (AgNes) for the period once the Electricity Network Tariffs Ordinance (StromNEV) has ceased to be in effect in accordance with section 29(1) in conjunction with sections 21 and 21a of the Energy Industry Act (EnWG) on 12 May 2025 [GBK-25-01-1#3].

Upon opening the proceedings, the Bundesnetzagentur published a [discussion paper](#) that presented the changes in the framework conditions brought about by the energy transition, a target vision, an analysis of the current situation, a comparison between the current situation and the target vision, and initial adaptation options based on this. The responses to the subsequent consultation on the paper and the contributions in the industry workshop held at the beginning of June 2025 helped to set out the various players' target visions and ideas and point to the advantages and disadvantages of different adaptation options. The Bundesnetzagentur published the [responses to the consultation](#).

The Bundesnetzagentur is now condensing the options to be considered, taking into account the findings from the consultation and the workshop and in close dialogue with the experts commissioned to produce reports for the AgNes process. This status report contains specific proposals that indicate the direction in which the Ruling Chamber is tending at this stage. These proposals will now be discussed in detail and examined for their practicability in expert workshops.

The Bundesnetzagentur has also [published](#) a report that analyses the different approaches in Europe to designing network tariffs.

This paper builds on the latest proposals for the [basic network financing model](#) and the [network tariffs with an incentive function](#) and presents the current situation regarding the broadening of the financing base by involving producers in the covering of network costs and reducing pressure on the whole system by introducing an incentive component for producers. Its sole focus is network tariffs for full feed-in generating installations at and above the low-voltage level with interval metering; there are separate points of orientation for [storage facilities](#) and [prosumers](#).

Providing clarity on the current situation here will help to structure the subsequent discussion, especially at the expert workshops.

2. Current status of discussions on the involvement of producers in network costs

The involvement of producers in network costs continues to be a preferred option in the AgNes process. There are possible mechanisms to achieve this: network tariffs with a financing function and network tariffs with an incentive function.

The Bundesnetzagentur is currently leaning towards the introduction of dynamic network tariff components for producers – ideally from 2029, if feasible.

Dynamic network tariffs for producers should initially be introduced with a low starting point based on the European legislative provisions that specify a limit for transmission systems of €0.50 per megawatt hour (MWh), to which the costs for ancillary services may be added. The Bundesnetzagentur intends to make use of this possibility. The idea of taking a proportion of the congestion management costs (working hypothesis: 50%) as a basis for calculating the dynamic network tariffs for producers, too, suggests itself here.

In the introductory phase, the priority is less to relieve congestion as fully as possible and more to assess empirically the price sensitivity of producers and their flexibility through moderate pricing.

The Bundesnetzagentur is also seeking to introduce a component to ensure the refinancing of network costs by producers in the AgNes process. Capacity-based prices suitable for this purpose could be introduced for producers from 2029. Capacity-based prices are an important financing instrument for network costs to be covered in a plannable way. Their effect is largely neutral as far as market activity is concerned, as they do not affect the marginal costs of generation, yet they can also potentially steer behaviour to bring the need for network connection capacity down to an efficient level.

Unlike in the basic model for consumers, in which the capacity-based tariff is related to a chosen capacity and complemented by differentiated energy-based prices, the capacity-based tariff here relates to the contractually agreed network connection capacity. Moreover, capacity-based prices are highly predictable for producers compared to other price components. They can theoretically be taken into account in the auction procedures for new installations.

The Bundesnetzagentur is not seeking to introduce energy-based prices for producers as a financing component.

Questions of the protection of vested rights are different for producers than for other network users. It is true that the principle that confidence in the continuation of a favourable legal situation (in this case section 15 StromNEV) is **not** generally a circumstance worthy of protection also applies to producers.

However, that may be different for parties that carried out their investments on the basis of state-organised auction proceedings assuming a constant legal framework. Existing renewable energy installations and comparable producers could, therefore, benefit from the principle of the protection of legitimate expectations for a certain period of time. The Bundesnetzagentur will therefore look closely at the issue of whether there are likely to be legitimate expectations worthy of protection and the effect of this on the future determinations.

This is discussed in more detail in section 7 below, starting on page 9.

The Bundesnetzagentur also supports the introduction of a construction cost contribution for producers as a complementary steering and financing mechanism.

The construction cost contribution serves to discipline capacity requests, a function that it takes on right at the point of entry. As the construction cost contribution is a one-off, investment-related sum coupled to the chosen connection capacity, it works towards an efficient sizing of the network connection capacity from the start. Although it is not an ongoing source of financing for the entire existing network, it provides a pre-defined, one-off financing contribution. The financing contribution from the construction cost contribution reduces the network costs that have to be allocated via the other, general network tariffs.

Flexible connection agreements for producers can influence the valuation of construction cost contributions.

The aim of the AgNes process is to create a network tariff system with appropriate and cost-reflective financing and incentive instruments. The incentive instrument is intended to encourage behaviour that is favourable to the network. Both will apply equally to consumers and producers of electricity. Producers, too, will therefore be required to pay a dynamic network tariff (designed either positively or negatively, as appropriate) and a financing contribution for the network infrastructure. A positive or negative design means that the direction of network use at a particular place and time decides whether network users make a payment or receive one, as they are either contributing to the congestion or helping to relieve it, depending on the direction. The tariff is to be designed with due consideration for the market and maintaining a proportionate protection of legitimate expectations for existing assets with financial support.

For the event that the proceeds from the dynamic energy-based prices and the construction cost contribution already provide sufficient financing contributions, the Bundesnetzagentur is considering whether and when it would be possible to do without the imposition of capacity-based prices.

3. Basic functions of network tariffs

The paper discussing the state of considerations on the basic network tariff model has already presented the two basic functions: the financing and the incentive function. The distinction between the two is also essential for the discussion on the extent to which, and with what objective, producers should be included in the bearing of network costs. It will therefore be summarised here for the sake of clarity.

The purpose of tariff components with a **financing function** is to ensure that the network costs can already largely be refinanced. Stable and plannable returns are also an important aspect given the network operators' large financing needs. Criteria including cost reflexivity, acceptance, fairness and viability as well as legal requirements have to be taken into consideration. Tariff components with a financing function always also set incentives for a certain behaviour. When designing the tariff system, therefore, it is important to prevent the creation of unwanted incentives as far as possible.

In theory, injection tariffs with the primary focus of financing the networks have three possible objectives:

1. less strain on consumers by having producers share in the burden of network tariffs;
2. regional redistribution of network costs – network regions with a lot of electricity fed in would potentially be able to generate higher income from injection tariffs;
3. participation in financing from abroad.

In accordance with EU law, tariff components with an **incentive function** are for influencing investment and, above all, usage decisions of network users in such a way that the cost effects of these investment or usage decisions on the network are internalised in them (primary steering function aimed at changing behaviour). The Bundesnetzagentur has laid out its proposals for the setting of incentives using dynamic energy-based prices in its [paper “Dynamic network tariff component: points of orientation in the AgNes determination proceedings” of 17 December 2025](#).

However, financing contributions can also be achieved using tariff components with an incentive function (secondary financing function). This happens in particular when the behaviour incentivised with the price signal in the tariff component does not occur, or does not occur fully, and instead investment or usage decisions are made contrary to the price signal of the network tariff component with an incentive function. In this way, network tariffs with an incentive function work in a similar way to other incentivising price signals, such as the tax on tobacco products.

4. Application of the basic model to create incentive and financing instruments for producers

In the case of the injection tariffs, the Bundesnetzagentur continues to make a distinction between tariffs with an incentive function and those with a financing function.

Financing function

The following points are arguments in favour of the reliable participation of all producers in the financing of the network costs:

- Both feeding in and withdrawing electricity put strain on the network infrastructure.
- In a substantial – or even overwhelming – number of cases, it is generation installations that drive the need for the network to be expanded.
- The massive structural changes in the energy supply system are leading to rising network costs. This creates an added incentive for those network users that have so far had to pay to optimise their behaviour to avoid paying tariffs, which in turn increases the burden of the tariffs on the remaining payers. Including producers in the covering of network costs would reduce the network tariffs for consumers and could help to secure a broad base of cost bearers for the long term.
- The regional differences in network tariffs as the renewable energy network expands can be balanced out not only via a mechanism for passing on costs but also when they arise through the imposition of injection tariffs.

On the other hand, the following opposing aspects are also worthy of consideration:

- The contribution of injection tariffs to the financing of network costs is rather low in all European countries. The bureaucratic effort required to impose injection tariffs with a financing function alone, without including the ancillary service costs and without introducing an incentive component, would have to be viewed critically.
- The benefit for consumers in terms of reducing costs is probably limited since tariffs are largely passed on either via the market (if they are volume-based) to consumers in the form of the electricity price or via support systems (if they are capacity-based) to taxpayers in the form of higher support sums.

- **Volume-based tariffs (€/kWh)**, assuming they can be passed on, are passed on fully in the electricity price, which is initially the same for all consumers. Consequently, electricity-intensive network users – subject to a rule on industrial electricity prices – could face an additional financial burden. These consumers already pay lower network tariffs due to the cascading of costs in the current system unlike with the electricity wholesale price, which is initially the same for all. The tariffs can be much lower thanks to special arrangements for electricity-intensive industry, for example.

Volume-based tariffs could also lead to a shift in the merit order in the internal market, with other power plants from Germany and abroad possibly coming to the fore. This could potentially disadvantage and push out German generation in the international electricity market if foreign power plants have to pay no or lower injection tariffs.

- **Capacity-based tariffs (€/kW)**, provided they are appropriately sized, have the positive effect of incentivising a realistic capacity demand and thus do justice to the scarce connection capacity. Capacity-based prices raise the fixed costs that have to be refinanced additionally by the generating installations, which could impact auction bids and capacity markets or have a negative influence on investment decisions with regards to the addition of new generating capacity. Existing installations would also have to pay these costs for capacity-based tariffs from their own (purely energy-based) revenue, which could in turn affect how they remain in the market.
- **Power-based tariffs (€/kWh)** basically have the same disadvantages as capacity-based tariffs. They also have the same inhibiting effect on flexibility that can be seen on the consumption side.

Conclusions

Having weighed up these arguments, the Ruling Chamber is currently *in favour* of the introduction of tariff instruments with a financing function in the form of capacity-based prices. It is *not* seeking the introduction of volume-based or power-based tariffs for financing. Not employing instruments with a financing nature for individual network users as a matter of principle would be inconsistent in the system and unjustifiable on grounds of non-discrimination with respect to other user groups, especially those that are to be required to make a contribution to financing for the first time. More information on the derivation of this approach may be found below in section 8 from page 12.

The network tariffs with a financing function will be moderate. An initial calculation example indicates a range of €4 to €7/kW, depending on whether it is based only on the costs of transmission system operators (TSOs) or also on the corresponding cost components of distribution system operators (DSOs). This includes the general financing contribution permitted at the extra-high voltage level under EU law and half of the costs for the ancillary services of balancing energy and loss energy. The Ruling Chamber does not plan to fully attribute these costs to producers despite the legal possibility of doing so. Producers without interval metering and that do not have to be fitted with smart metering systems could come under a de minimis threshold. It is not possible for producers to choose freely the capacity to be priced, as in the proposed basic model on the consumption side, because that would necessarily lead to a combination with energy-based tariffs and their introduction is not supported for the reasons given above.

The imposition of a tariff component with a financing function could become obsolete in the event that a comparable financing contribution would already arise from the tariff component with an incentive function described below. The same applies in the event that a construction cost

contribution can be quickly introduced by amending the Renewable Energy Sources Act (EEG), the CHP Act (KWKG) and the Power Plant Grid Connection Ordinance (KraftNAV) and has comparable effects to a financing component.

The tariff component with a financing function is to be introduced also for producers connected to the distribution network level so as not to send any incorrect locational signals.

It must be considered whether the tariff component for producers with a financing function is to be uniform across the country. This would reduce the effort and cost involved in the process, especially in the introductory phase, and avoid additional competition differences.

Incentive function

The Ruling Chamber essentially supports the creation of targeted incentives for producers in line with the [“Dynamic network tariff component: points of orientation in the AgNes determination proceedings”](#) published on 17 December 2025.

Injection tariffs with an incentive function could internalise the cost effects of (short-term) usage decisions and (long-term) investment decisions in order to reduce the network costs influenced by them in the long term through the setting of targeted incentives. At the same time, tariff components with an incentive function can also achieve a certain financing contribution, even if this is not the objective of the incentive component, for example if the behaviour incentivised by the tariff component through price signals does not occur or does not occur fully.

- As it is based on the short-term variable network costs, the tariff component needs to be temporally dynamic and location-dependent and its introduction must be mandatory.
- For dynamic injection tariffs, various effects need to be considered, such as possible systemic additional burdens that network users are not able to fully compensate for even by responding to the dynamic tariff. In particular, it needs to be examined how undesirable overreactions to a dynamic network tariff can be avoided for generating installations with similar marginal costs, that is, especially for renewable energy installations.
- As for the consumption-based network tariffs, it is possible to use the congestion management costs as a parameter. These costs could be divided 50:50 between consumers and producers.
- The incentive component is to apply to producers of all network levels, as for the consumption side. That means that the network tariffs including dynamic network tariffs of an upstream network level **must** be imposed with the same temporal granularity for different times at the downstream levels, even if the downstream network level does not have its own incentive component.
- The distribution networks **can** have their own incentive component if there is sufficient need for it, ie especially those distribution networks where congestion management costs are already high or will be in the foreseeable future.

More details on the Ruling Chamber’s deliberations on this issue may be found below in section 9 from page 16.

Contributions to construction costs

For medium to long-term network expansion costs in the connection network, it seems logical to impose a one-off construction cost contribution that should address at all events those network costs of connected network users that are directly determined by the connection capacity at a

particular location of a particular network level. The construction cost contribution does not necessarily need to cover the distant network expansion costs. The costs of (electrically) more distant equipment are primarily influenced by the collective behaviour of network users, rather than the connection capacity of individual network users.

Construction cost contributions can by definition only be used for new connections.

Regardless of the question of calculating their size, they simultaneously have a financing function and an important incentive function because they counteract an unnecessarily high demand for capacity and can set location incentives through their different sizes as well.

5. Consultation responses to the AgNes discussion paper

The great majority of comments were opposed to involving producers generally in the **financing of network costs** via injection tariffs with the following main arguments.

Market distortion and loss of efficiency: the introduction of injection tariffs, especially if designed as energy-based prices, would artificially distort the merit order in the electricity market, which could lead to power stations being used in an inefficient order.

Effects on exports and imports: the changes to the cost structures brought about by injection tariffs would impact the competitiveness of domestically produced electricity and could thus affect the cross-border electricity trade (exports/imports).

Redistribution and additional strain on industry: volume-based injection tariffs would be passed on to final consumers, primarily via the electricity price and possibly also via higher power purchase agreement prices. Consumers would thus indirectly bear the costs, going against the actual objective of relieving the burden on consumers by having producers share in it. Moreover, putting the costs on the general electricity price would lead to larger, and therefore often also more price-sensitive, electricity consumers such as industrial enterprises possibly incurring a greater burden from the higher electricity wholesale price. In contrast to the electricity wholesale price, which was initially the same for all, larger electricity consumers already paid lower network tariffs due to the cascading of costs in the current system and these could be even lower thanks to special arrangements, for example for electricity-intensive industry.

Rising need for support: injection tariffs could make renewable energy projects less viable and hence in need of more financial support, shifting costs from network users to the federal budget. The need for complementary instruments such as a capacity mechanism to ensure security of supply could rise, too.

Jeopardising legitimate expectations and viability: injection tariffs could undermine legitimate expectations of investments already made. In particular if existing installations were affected, subsequently attributing costs would jeopardise the viability of these projects and damage confidence in the reliability of the legal framework.

Greater complexity and bureaucracy: the imposition of network tariffs would become more complicated, in particular because more parties would have to be integrated into the system.

Negative effects on the expansion of renewable energy: uncertainty about possible changes to network tariffs over time, and how great these could be, could cause additional uncertainty for bidders in renewable energy auctions, possibly impacting their willingness to participate and the achievable prices.

The opposing comments were in favour of producers' involvement via injection tariffs. Among these supporters, the majority tended to emphasise the **setting of network-beneficial incentives** that were possibly revenue-neutral.

There was a mixed response to the **imposition of a construction cost contribution**. Some comments regarded such a contribution as a suitable tool to influence the choice of location if it was designed with regional specificities. There were some calls for an exemption for installations connected in a way that is neutral for the network. Opposing views were also expressed on the grounds that the existing means of influencing location (reference yield model and land-use planning) must be regarded as sufficient. Moreover, advantageous sites, such as those with weather conditions conducive to yield, available space and other general infrastructure should not be put at risk. Only a few respondents saw the construction cost contribution as a complement to the imposition of an injection tariff. It was rather regarded as an alternative in the discussion about the introduction of a tariff.

6. Legal framework and application of injection tariffs in Europe

Legal framework

Permissibility is established in principle in EU law (Regulation (EU) 838/2010) and in German law through the power to issue determinations in the EnWG (section 21(3) sentences 1 and 4 EnWG).

However, Annex Part B(3) of Regulation (EU) 838/2010 sets an upper limit that applies to injection tariffs at the transmission system level. Accordingly, the annual average injection tariffs paid by electricity producers connected to the transmission system must not be more than €0.50/MWh. This limit does not apply to all Member States without exception, however. Different upper limits were specifically determined for Denmark, Sweden, Finland, Romania, Great Britain and Northern Ireland. There are also objective exemptions from the EU limit at the transmission system level pursuant to which the following tariffs to be paid by producers are not included in the calculation of the average annual transmission tariffs:

- for physical assets required for connection to the system or the upgrade of the connection;
- for specific system losses; and
- for “ancillary services”, which combine the typical ancillary services and the congestion management costs.

These costs, which are not included in the tariff limit of €0.50/MWh, give Member States leeway in the adding of certain costs, which could help to send location-dependent and behavioural signals.

It is not legally clear whether the injection tariff cap set out in Regulation (EU) 838/2010 for the transmission system level is also binding for generating installations connected to the distribution network level.

Application in Europe

There are very different designs of injection tariffs applied in many European countries at both the transmission and distribution network level. BET Consulting, in cooperation with Aecoute, produced a report for the Bundesnetzagentur on this topic. Its findings have been [published](#) on the Bundesnetzagentur website.

The countries examined apply tariffs based on energy-based prices, power-based prices and flat rates. In some countries, the injection tariffs also vary by location and/or time.

At the transmission system level, the contribution of injection tariffs to covering network costs in the majority of countries is less than 7%. This probably reflects the cap of €0.50/MWh on injection tariffs at the transmission system level in the EU legislation (excluding ancillary service costs).

At the distribution network level, injection tariffs finance less than 5% of network costs in most countries, even though the limit is not legally clear at the DSO level.

Looking at Germany's neighbours, **Austria** imposes injection tariffs with two energy-based tariff components for producers with more than 5 MW of power:

- an ancillary service tariff of 0.080 ct/kWh and
- a network losses tariff of 0.279 ct/kWh.

In addition, a supply infrastructure contribution of no more than 0.05ct/kWh of electricity fed in is due to be introduced from 2027. The contribution is intended to help finance the network expansion and will apply to all installations with a connection capacity of over 20 kW. The Austrian Federal Ministry of Economy, Energy and Tourism (BMWET) determines the exact design of the contribution for each calendar year in an ordinance. ("The economic operation of installations and the absence of negative effects on electricity price developments must be ensured in the design of the supply infrastructure contribution. In the calculation, it must be taken into consideration that the burden should be spread evenly across all network levels.") The supply infrastructure contribution is imposed by the network operators to whose networks the installations are connected and is also the basis of the network tariff calculation with cost-reducing effect.

No injection tariffs are currently imposed in the **Netherlands**. Producers merely have to pay the one-off connection costs and a low, flat metering tariff. Since 2024 some electricity suppliers have been charging for the feed-in of electricity from distributed generation installations, especially solar PV installations. This charge is not a tariff component but a contractual price element of the suppliers that does not come under the scope of regulation. However, injection tariffs have been announced in the Netherlands and their introduction is being prepared by the Netherlands Authority for Consumers and Markets (ACM). A priority is achieving foreign participation in the costs of expanding the network in the offshore sector and the related electricity exports.

7. Legitimate expectations

As mentioned above, there are particular questions regarding the protection of vested rights for producers. The explanations given below are intended to provide an indication of the direction the Ruling Chamber could tend towards in this issue. These points of orientation do not claim to deal fully with all legal issues or present in detail all considerations that the Ruling Chamber has already undertaken.

When dealing with questions of the protection of legitimate expectations, it is always important to distinguish carefully between two issues: whether there are expectations worthy of protection and only then, in what way the worthiness of protection affects the decision to be made. In this respect, the balanced decision that the Ruling Chamber has to make is quite different for the tariffs with a financing function and for the tariffs with an incentive function.

For producers, as for other actors, the principle applies that an expectation that a favourable legal situation (in this case section 15(1) sentence 3 StromNEV) will be maintained does not in and of itself create **a basis for legitimate expectations that is worthy of protection**. Unlike with respect to other participants in the energy market, the legislature did not in section 15(1) sentence 3 StromNEV revoke any previous tariff requirement in order to incentivise a particular behaviour from participants. This does not, however, give rise to any particular justification for the expectation that this solution would remain permanently – especially in light of the fact that, since September 2021 at the latest, it became clear that the party responsible for deciding on the issue had changed. The introduction of network tariffs for producers on 1 January 2029, as planned by the Ruling Chamber, would provide a sufficient transition period, even if it is understandable that those affected may take a different view. This ultimately only strengthens the legal situation that would have occurred anyway by law due to the repeal of the StromNEV and thus the special arrangement of section 15(1) sentence 3 contained therein.

However, the situation could be different for market participants that invested on the basis of state-organised auction proceedings assuming a constant legal framework. Existing renewable energy installations and comparable producers could benefit from a particular protection of legitimate expectations for a certain period.

It could be assumed that installation operators have legitimate expectations worthy of protection if the support for renewable energy was still calculated on the basis of section 15(1) sentence 3 StromNEV, applicable for a transition period, and the expectation of the producers' exemption from network tariffs was not undermined. It is true that an exemption for existing installations entitled to payments under the EEG is not mandatory under Article 6 of the Renewable Energy Directive (in conjunction with section 19 et seq EEG 2023). However, according to the case law of the Federal Constitutional Court (BVerfG) on the amendment of EEG support by quasi-retroactive laws (BVerfG NVwZ 2019, 702 margin no 25, NVwZ 2019, 715 margin nos 15, 23), the auction proceedings could have created a particular basis of expectations for investments. This is because the (lack of a) network tariff requirement for generation installations is likely to have been factored into the calculation of bids for the set price in the auctions in addition to the costs for constructing and using the installations, to be forecast by the installation operators, and the possible market revenue, also to be freely forecast by the operators.

It is possible to make the opposing argument: that installation operators calculate their costs independently (value set by auction) and therefore the consideration of foreseeable legal changes can be expected as well. However, for network tariffs with a financing function, the requirement to realise the projects that occurs when the bid is submitted for the event that it is successful in the auction suggests that there is an assumption of legitimate expectations. This marks the time at which the investment decision becomes legally and economically irreversible. A subsequent burden could upset the balance of performance and consideration (realisation in return for guaranteed feed-in remuneration). Capital is bound up in the projects and they have created capacity based on the promise of a stable framework. A rigid, unavoidable financing tariff would change the basis for calculation in a one-sided manner and disadvantageously. The requirement to realise the project that arises as soon as the bid is submitted thus functions as a “point of no return” that secures the necessary protection of legitimate expectations for those installations for which the investment decision has been calculated on the basis of the old framework conditions and the binding commitment made on this basis.

Regarding the tariffs with a financing function, therefore, the Ruling Chamber is tending towards assuming legitimate expectations for “auction actors”.

As mentioned above, this approach is suited to be transferred to generation installations that were not built in accordance with the EEG but rather with the KWK or other legal regulations with a

corresponding requirement to realise the project. At the same time, it leads to differing treatment of renewable energy generating installations. It can also explain why the Bundesnetzagentur does not regard this circumstance alone as sufficient in the case of other installations for which there may have been hopes of an exemption from tariffs.

The approach does not in itself clarify the point of no return from which time a legal requirement to realise the project must be assumed. Naturally, the Bundesnetzagentur is aware of the very restrictive case law that has been issued on this topic, but, according to the present state of knowledge, this only deals with situations in which the same actor wanted a different regulation for comparable situations. The situation here is clearly different. At the same time, the Ruling Chamber is tending towards assuming that the protection of legitimate expectations in a consideration arrangement no longer exists at a very late time. The exclusion could be from the time of publication of these points of orientation, from the time of publication of a draft decision or from the time of publication of the immediately enforceable determination.

An important question is whether, in an auction after the time of publication of these points of orientation, it is possible to gain sufficient indication of whether the bidders have already priced the upcoming tariff requirement for network usage into their bids. It would not be expedient if there was a “double consideration”, ie they were submitting higher bids while the exemption from tariffs continued.

As stated at the beginning of this section, the principle of the protection of legitimate expectations is not an absolute ban on changing the existing legal situation but it does shape the discretion and proportionality considerations that happen in the event of a change. In the case of **injection tariffs with an incentive function**, this could lead to different results.

This is already indicated by the fact that tariffs with an incentive function are not applied all the time but only when there is network congestion. By their very nature, they are not unavoidable but are precisely intended to set an incentive to adapt behaviour so that they do not have to be applied. Due to their time restriction and their essential avoidability, therefore, tariffs with an incentive function can be more **proportionate** than injection tariffs with a financing function. In addition, tariffs with an incentive function in the design envisaged by the Ruling Chamber can also offer the opportunity to generate additional revenue. Above all, though, they have a security of supply aspect as well as getting all network users to participate in the costs they cause, in particular congestion management costs. As generation installations are gaining in power in relation to their load, network operators have to invest more and more effort on calculating in good time the possible feed-in arrangements and the resulting flows and checking the flows against the transport capability of the network. Without additional instruments, this could reach its limits. Network tariffs with an incentive function will not solve this problem alone but they can and must make a significant contribution to overcoming it. There are therefore very important reasons for regarding the protection of legitimate expectations as a lower priority with regard to the network tariffs with an incentive function, even if it is acknowledged in principle.

If it turns out in the further course of the determination proceedings that individual producers would be permanently exposed to a significant incentive not to feed in their electricity that was practically unavoidable with economically viable behaviour, the incentive component could be designed proportionately to take account of this, especially by adjusting the positive or negative pricing.

8. Financing function of the network tariffs for producers

There are two basic stances in the discussion on participation in financing.

- On the one hand, it is argued that the electricity supply system, including the network subsystem, is ultimately there to supply consumers with electricity. In that case, it basically makes sense for consumers to bear all the network costs, aside from any incentive functions.
- On the other hand, some argue that any actor making use of the network should essentially make a contribution to financing it. Any exception to this is seen as a privilege that needs to be justified. The existing privilege that injection tariffs cannot currently be imposed under the StromNEV has led over the years to an improper allocation of network costs among the distribution network areas. It has ultimately required the cost allocation to be corrected. Since 2025, a compensation mechanism worth billions has been used to redistribute the additional costs of the integration of renewable energies so that the network costs related to feed-in are allocated more fairly. The financing takes place outside the electricity network tariff system via a fully energy-based price surcharge for special network use, with small consumers bearing the largest share.

In contrast to this mechanism of compensating for additional costs, a cost-reflective participation of producers in the network costs would not only redistribute costs within the group of consumers but would also lower the network costs to be borne by consumers overall, which could lead to a broader base of cost bearers in the long term. The massive structural changes in the energy supply system are increasingly threatening to erode this base, encouraging the network users hitherto required to pay to optimise their behaviour in such a way that they remove themselves from the community of solidarity. This in turn increases the burden of network tariffs for the remaining payers.

To assess the consequences of the participation of producers for the financing of network costs, the way that different injection tariffs with a financing function work will be described below.

- **Volume-based injection tariffs** represent additional variable costs for producers that are priced into the bids on the electricity market, assuming they can be passed on. Whether they can be passed depends heavily on factors including competitive intensity. In the event of overcapacity, the additional costs of a volume-based injection tariff cannot simply be fully passed on. The costs for volumes of electricity already sold for the long term tend not to be able to be passed on either. In that case, the producers would bear part of the costs.

If the injection tariffs were indeed further passed on, the costs addressed would ultimately be passed on to consumers via a higher electricity price. Once transitional effects had subsided, this would also apply for electricity volumes marketed not via short-term electricity trading but via longer-term contracts, since the terms of these contracts, too, are based on the producers' expected costs. The aim of reallocating the costs from consumers to producers would not be achieved or it would only be achieved to a very limited extent.

If the electricity price went up it would in particular add to the burden of larger consumers as these would then pay the market price that applied to all consumers but was higher following the introduction of volume-based injection tariffs. In contrast to the electricity wholesale price, which is initially the same for all, larger electricity consumers already pay lower network tariffs due to the cascading of costs in the current system and these can be even lower thanks to special arrangements, for example for electricity-intensive industry. This is opposed to the established, and generally also desirable, system of allocation among the groups of final consumers.

However, this effect could also be weakened. The number of consumers connected to the extra-high voltage network is low in certain regions. The number of generating installations located there is much larger. In these regions, the additional burden on consumers caused by

higher electricity prices would simultaneously lead to reduced network tariffs on the consumption side due to the participation of producers in the network costs. This process would continue to a lesser extent at the subsequent voltage levels.

Moreover, owing to the cross-border electricity trade, domestic generating installations are in direct competition with foreign ones that may have to pay lower or no injection tariffs. This could cause domestic production to shift abroad and imports to rise. It can be seen, therefore, that the volume-based injection tariffs with a financing function are highly likely to affect the cost allocation and influence the merit order.

- **Power-based or capacity-based injection tariffs** cannot generally be passed on by operators of generating installations in the short term via the electricity price. They have no or only very rare influence on the feed-in behaviour of power plants and thus do not influence the short or long-term electricity trade. By contrast, effects on the short-term electricity market are to be expected if a price-setting power station produces electricity exceeding the previous feed-in capacity of that station and then the payment of an additional tariff becomes due.

Injection tariffs on the power fed in or contractually agreed capacity raise the fixed costs of producers, so they would put a strain on peak-load power plants, among others, which could have a negative effect on investment decisions for such plants. However, the energy transition means there will be a great need for residual power plants (the power plants that need to be switched on when renewable installations are unavailable) in the medium term. There may therefore be disadvantages for the sizing and composition of the generation system, which would tend to lead to a less efficient generation mix that would be associated with deadweight losses in the overall electricity generation system. In particular if the tariff level could change every year, this risk will be additionally priced in.

Tariffs on the feed-in power or capacity would also lead to significant problems for renewable energy installations. They would also act as a premium on the investment costs here. Existing renewable energy installations would have to pay these costs as well out of their own (purely energy-based) revenue. Consequently, there would probably be loud calls for transitional arrangements. For new installations, power-based or capacity-based injection tariffs for renewable energy installations would affect the auction bids and the additional costs would be taken into consideration in the financial support regime.

Power-based or capacity-based injection tariffs thus have the advantage of having a largely neutral effect on market activity since the marginal costs of generation remain unchanged.

However, neither volume-based nor capacity-based injection tariffs with a financing function help to resolve congestion in the short term as their rigid prices are not based on the actual utilisation of the network.

The scope of the financing function of injection tariffs could at least be partially restricted, however, by the EU rules described in the section on the legal framework. The upper limit of €0.50/MWh for TSOs mentioned there does not include the following tariffs payable by producers:

- for physical assets required for connection to the system or the upgrade of the connection;
- for specific system losses; and
- for “ancillary services”, which combine the typical ancillary services and the congestion management costs.

These costs, which are not included in the cap of €0.50/MWh, give Member States leeway in the adding of certain costs, which could help to send location-dependent and behavioural signals. The distinction between network tariffs with a financing function and those with an incentive function means that at least the expanding of the €0.50/MWh limit to take in congestion management costs should be primarily implemented with network tariffs with an incentive function. For other costs that come under the exemptions from the €0.50/MWh limit, it is not clear whether or to what extent it is necessary to design these tariffs variably (this question arises, for example, in the case of costs for balancing or loss energy, the costs of which the four TSOs have projected to be a combined amount of around €1.6bn in 2026). A simple capacity-based tariff with a financing function could certainly be applied to these costs.

The following, simplified calculation example is intended to give a rough idea of the possible level of a uniform capacity-based tariff. It is based on the legal upper limit for TSOs of €0.50/MWh (corresponding to forecast revenues of about €250mn for a gross electricity generation of 500 TWh) and includes the costs of balancing and loss energy. For the costs taken as a basis for producers, it is assumed for simplicity's sake that there is an equal division of costs between producers and consumers. The cost item arising for producers is then divided by the assumed installed generation capacity.

Simplified calculation example

Starting point: EU rules (€0.50/MWh)	€250 mn
+ Addition of half the loss energy costs of TSOs (1)	€415 mn
+ Addition of half the balancing energy costs of TSOs (2)	€369 mn
Σ Total TSO costs (1) + (2)	€1,034 mn
÷ Installed generation capacity	250 GW
= Capacity-based tariff (costs TSO level)	€4 /kW
+ Addition of half the loss energy costs of DSOs (3)	€825 mn
Σ Total TSO and DSO costs (1) + (2) + (3)	€1,859 mn
÷ Installed generation capacity	250 GW
= Capacity-based tariff (costs TSO and DSO levels)	€7 /kW

Assumptions:

Costs on 2026 basis (projected)

Projected loss energy costs of DSOs under the responsibility of the Bundesnetzagentur amount to €1,404mn. Share of the federal state regulatory authorities is a rough estimate.

Costs are divided 50:50 between producers and consumers.

Assumed gross electricity generation of about 500 TWh and installed generation capacity of 250 GW.

If certain existing installations were exempt from payment for a period of the protection of legitimate expectations and the total installed generation capacity was used as a basis for calculation, the costs would not be fully covered. The proportion of generation from renewable energy sources makes it likely that the scope of financing would be considerably restricted, at least to start with.

The simplified calculation example does not show the actual later design of a capacity-based price but is intended to provide an indication of its possible scale.

The Ruling Chamber has considerable doubts as to the usefulness of designing the model on the basis of ordered capacity, as for consumers, since in such a model the exceeding of the capacity would have to be allocated an energy-based price affecting the electricity market. It would therefore be logical to base the pricing on the contractually agreed network connection capacity, compliance with which the connection network operator is obliged to work towards. This could be achieved with an additional capacity-based price as a penalty or by curtailing the installation without compensation.

Even using the contractually agreed network connection capacity as a base can produce a steering effect that can reduce the demand for network connection capacity to an efficient level. The pricing of contractual network connection capacity also permits more generating installations to be connected to a network connection point than its nominal capacity would otherwise allow.

Limiting the level of tariffs at the TSO level necessarily leads to the question of whether injection tariffs with a financing function at the DSO level can or should be calculated in the same way or not. A uniform tariff would have significant advantages with regard to the bureaucratic effort involved and the homogeneity of the competitive situation of the generating installations. On the other side, it would need to be particularly justified that the calculation method mentioned above for the calculation of injection tariffs at the TSO level also represented a sufficiently comprehensible relation to the attributable costs at the distribution network level. The Ruling Chamber welcomes comments on this issue.

Questions

- Do you agree that costs for network losses and balancing capacity should be used to form a network tariff component with a financing function (capacity-based price)? Alternatively, should these costs also be assigned to the incentive function?
- In a world with increasing production of renewable electricity, whose marginal costs are not zero but are much lower than for fossil fuel-based electricity production, are injection tariffs expected to have a significant effect on electricity prices? What consequences are expected for the volumes of imports and exports? Will electricity exports get more expensive?
- Should all full feed-in generating installations at and above the low-voltage level with interval metering be included? Or should prosumers be included in the considerations as well? Or are the previously discussed options of the Bundesnetzagentur for prosumers sufficient to guarantee an appropriate participation in financing (see [points of orientation on tariff components](#))?
- Is it conceivable in a single electricity wholesale market to treat new installations and existing installations that enjoy a protection of legitimate expectations differently?
- How are the overall effects of injection tariffs with a financing function on the viability of installations to be assessed?

9. Incentive function of the network tariffs for producers

The purpose of tariff components with an incentive function is to encourage network users to take into account the effects of their decisions on network costs. These incentives can relate to short-term variable network costs such as congestion management and loss energy costs that are influenced by the usage decisions of network users. They can also target medium and long-term network expansion costs that are driven by both usage and investment decisions.

The introduction of injection tariffs with an incentive function could also generate contributions to financing, for example if the behaviour incentivised by the tariff component through price signals does not occur or does not occur fully. The primary aim of injection tariffs with an incentive function is, however, to internalise the short-term variable network cost elements, especially marginal congestion and redispatching costs, in the usage and investment decisions of network users. It would be possible in principle to internalise marginal network loss costs in the usage and investment decisions of network users as well. Network losses are also influenced by network user behaviour but are less sensitive to decisions about withdrawals or feed-in. The costs of network losses are also far less able to be influenced by users' decisions than congestion costs. For these reasons, the Ruling Chamber will concentrate below on the setting of incentives with the aim of relieving network congestion.

Injection tariffs with an incentive function that are intended to affect usage decisions should preferably be volume-based so as to set clear and efficient incentives. Although making other network tariff components dynamic is conceivable, the Bundesnetzagentur does not ultimately consider this to make sense. The requirements of a dynamic capacity-based/power-based price are no less challenging. Moreover, neither power-based nor capacity-based prices can precisely reflect the actual costs (marginal costs) of an additional unit of consumption in a 15-minute period as they rather represent the average costs of the provision of a unit of capacity/power over a whole year or the remaining part of a year. To enable a cost-reflective incentive system, the time intervals to which the dynamic capacity-based/power-based price component refers would have to be shortened, which would ultimately be the equivalent of a dynamic energy-based price component. Dynamic capacity-based/power-based prices are therefore less suited to internalising congestion costs than a dynamic energy-based price component by means of which marginal costs of a usage decision can be reflected, at least approximately.

Volume-based tariffs intended to influence the behaviour of producers must have an efficient, temporally dynamic and location-dependent design in order to achieve their objective. A lack of specificity can be counterproductive and should be avoided as the underlying interdependencies are also heavily location and time-dependent and, if not designed efficiently, can lead to unwanted incentives that could trigger inefficient or even counterproductive usage decisions. On the other hand, a design that is too complex is also a hindrance to practical implementation and thus for the introduction of incentive-based injection tariffs. A dynamic, volume-based injection tariff has the same effect on the electricity wholesale price as a volume-based tariff with a financing function, but with incentives differentiated by time/place (see also section **Fehler!** **Verweisquelle konnte nicht gefunden werden.** on volume-based injection tariffs).

Dynamic injection tariffs should essentially be mandatory for all producers in order to avoid adverse selection. The need for symmetrical price signals (positive or negative, as appropriate) and, as for the injection tariffs with a financing function, the question of imposing the tariffs on existing versus new installations (with a focus on non-discrimination and the principle of the protection of legitimate expectation) must be discussed.

Possible incentive-based injection tariffs aimed at internalising short-term variable network costs

Injection tariffs on the basis of congestion management costs

Congestion management costs essentially depend on the behaviour of network users. It is therefore desirable to incentivise changes in behaviour that relieve congestion and would ideally bring the costs of managing congestion down.

As with the dynamic network tariffs, the price signal of a dynamic injection tariff should be based on the actual congestion, as for the dynamic network tariffs on the consumption side, which requires a clear coordination of the dynamic network tariffs on both sides. A price granularity of 15 minutes makes sense, possibly without prescribed price steps. It is only possible to forecast the congestion with sufficient accuracy a relatively short time before the actual feed-in time. It is thus considered expedient to determine and publish the price signal the day ahead before the balancing energy and spot markets close, to allow market participants to factor the price signals of the dynamic tariffs into their bidding behaviour.

As well as such a calculation system based on existing congestion, a dynamic injection tariff could also be based on the reduction of longer-term network expansion costs (see also [“Dynamic network tariff component: points of orientation in the AgNes determination proceedings” of 17 December 2025](#)). This would aim to apply a dynamic network tariff as soon as the network utilisation threatened to exceed a certain threshold but no congestion management measures were yet necessary.

The following simplified calculation example is intended to provide an indication of the scale of a dynamic network tariff that would ultimately value an additional congestion volume with an average of €0.10/kWh:

Example calculation: dynamic network tariffs	
Half of congestion management costs	€1.4 bn
Volume of congestion management measures (half)	14,469 GWh
Dynamic network tariff (approx)	€0.10 /kWh

on the basis of 2024 costs and volumes

The Bundesnetzagentur intends to start cautiously with moderate prices as it seeks to find the best solution for the system. It could be possible in the introductory phase to grant discounts, for example, that would be reduced with the successive learning effect.

The effect of dynamic volume-based injection tariffs for the affected generating installation always depends on various factors such as the type and location of the network congestion and the expectation of how flexibly the producers respond to the price signals.

In areas and situations with congestion caused by backfeeding (in front of the congestion), each kWh generated when there is a risk of congestion is made more expensive in the amount of the dynamic energy-based price. If a generating installation feeds electricity into the network in these areas even though a dynamic energy-based price has been imposed, the operator of the installation has to pay the positive dynamic tariffs for each kWh fed in. If the generating installation then has to be curtailed in the course of congestion management, the costs arising from the compensation to the installation operator will be lower than usual by the same amount due to the payment of the dynamic network tariff. This causes the costs to be shifted from consumers to the generating installation, lowering the revenue from the installation by the amount of the dynamic tariff. On the other hand, if the installation does not feed in, the congestion situation improves and the congestion management costs are reduced, representing a desired change in the operation of the installation. The installation operator does not have to pay any dynamic tariffs but also does not achieve revenue from selling the electricity (market revenue and possibly market premium).

If the injection tariffs are applied with symmetrical positive or negative price signals, in **areas and situations with congestion caused by load (behind the congestion)** each kWh generated is made cheaper in the amount of the negative dynamic energy-based price. The use of the generating installation depends on whether the marginal costs of the installation are higher or lower than the market price plus the dynamic tariff.

The macroeconomic incentives and consequences of a dynamic network tariff in conjunction with the compensation payments for congestion management measures are shown as a typical example below.

Macroeconomic effect with optimal incentive:

An abstract example will be shown below in which in front of the congestion feed-in is expected and directly marketed to satisfy the same amount of demand behind the congestion but cannot be fully transported through the congestion. The feed-in thus needs to be reduced in front of the congestion and generated locally behind the congestion.

1. Compulsorily regulated congestion management

In the current regulated model, the network operator needs to take action and forcibly curtail the generation. For the actual physical delivery of electricity to satisfy the demand, the volume of electricity that cannot be transported due to the congestion is then generated behind the congestion, also due to compulsory measures by the network operator and at higher marginal costs than the near-zero that is typical of renewable energy. The result is high transaction and compensation costs.

2. Incentive-based congestion management (avoidance of costs due to incentive of dynamic injection tariffs)

In the incentive-based approach, dynamic injection tariffs are used to set a price incentive to reduce the volume of congestion. The network operator would impose a positive dynamic network tariff on each kilowatt hour fed in in front of the congestion for as long as the congestion exists. This tariff has to be taken into account in the calculation of compensation payments for any remaining congestion management measures, as otherwise the incentive effect would be lost.

Depending on the level of the dynamic network tariff, the following scenarios occur for the producer in front of the congestion:

Scenario A (no change in operation due to insufficient incentive): if the dynamic tariff plus the previous marginal costs is less than the sales revenue (market revenue and any market premium), the generating installation will continue to feed in electricity. It pays the positive dynamic network tariff for the intended congested feed-in. However, as the electricity is still fully sold, it still needs to be curtailed in the amount of the congestion. The compensation payment would be reduced by the amount of the dynamic tariff to be paid and the installation is accordingly less profitable. An alternative installation still has to be used behind the congestion to take over the electricity production of the amount curtailed due to the congestion at the higher costs.

From the payment of the dynamic tariff, the network operator generates income that helps to finance the unchanged congestion management costs. In an extreme case, this income might even exceed the congestion costs. This is actually the normal situation if the volume generated “below” the limit set by the congestion also has the tariff imposed.

Scenario B (change in operation with economically ideal effect): if the potential sales revenue (market revenue and any market premium) is less than the dynamic tariff plus the previous marginal costs, the generating installation will not feed in electricity. It therefore avoids paying the dynamic network tariffs. This change in behaviour is economically ideal if the dynamic network tariff is calibrated in such a way as to reduce the feed-in in the congested area by precisely the amount of congestion. By avoiding the proportionate sale of the volume of electricity that is causing the congestion, the congestion management costs that would otherwise be incurred do not occur. However, behind the congestion there are costs for local generation that are higher than the costs of generation in front of the congestion. These installations produce electricity because they become competitive owing to the “additional” costs of the congested installations. The additional total costs for the delivery of electricity (of the previous congestion volume) fall, however, due to the lower congestion management costs.

Scenario C (change in operation with over-incentive): if the dynamic network tariff plus the previous marginal costs in front of the congestion is higher than the potential sales revenue (market revenue and any market premium), there is a risk that too much generating capacity will be reduced, ie more than is necessary to resolve the congestion. The generally cheap capacity in front of the congestion will then tend to be replaced by more expensive capacity behind the congestion to a greater extent than is necessary. The consequences are rising electricity prices for all consumers and a lower profitability of the generating installation in front of the congestion.

Because solar and wind plants have nearly identical operating marginal costs, the decision to use them depends largely on the difference between the expected sales revenue (market revenue and any market premium) and the network tariff plus the previous marginal costs: as long as the dynamic network tariff plus the previous marginal costs is lower than the expected sales revenue, the generating installation will continue to feed in fully (similar to scenario A above). If, on the other hand, the dynamic network tariff plus the previous marginal costs is higher than the expected sales revenue, the generating installation will not feed in any electricity, at least in theory. A problem can arise if solar and wind plants with very similar market premiums see the same network tariff and behave in the same way in the second situation described above. This shows that the risk of overreactions needs to be averted and an exactly suitable design is challenging. The question therefore arises of how dynamic network tariffs for renewable energy installations can be made sufficiently precise. The considerations should include the fact that renewable energy installations are subject to a support regime that generates different incentive thresholds depending on what set price the installation has as a result of the auction results. Other economic conditions may also occur and lead to renewable energy installations accepting negative marginal costs in certain hours (for example to avoid wear and tear and diesel fuel consumption for wind turbines in idling state or because biogas plants are needed to generate heat), provided that hours with an adequate revenue situation follow immediately after. For conventional generating installations, it must be noted that they have different operating marginal costs depending on the generation technology used and thus the level of network tariff from which they would no longer feed electricity into the network is different as well. The situation is similar for fuel-powered renewable energy installations and, with some limitations, for geothermal and hydropower plants. If the marginal costs are not the same and the possible response of the installations is not uniform, the Ruling Chamber does not see this as an argument against the introduction of dynamic network tariffs, in particular because it is likely to clearly put the concerns expressed about a theoretically possible overreaction of the market into perspective.

Nevertheless, at this stage the Ruling Chamber draws the conclusion from the difficulty of calibrating the result of a behavioural change that it would be best to start with a rather cautious dynamic network tariff.

The question of application at the DSO level also arises for network tariffs with an incentive function for producers. As for the network tariffs on the consumption side, there must be a distinction between which instances of congestion trigger the introduction of dynamic network tariffs and the question of which network users should pay dynamic network tariffs.

The Ruling Chamber is tending towards taking the same approach for producer-side and consumption-side network tariffs. That means that the trigger for the introduction of network tariffs with an incentive function should be congestion at the transmission network level and, where necessary, congestion in the higher voltage levels of DSOs. The number of DSOs with high congestion management costs is, fortunately, still limited. At voltage levels below the transformation level to medium voltage, the cost of identifying congestion (each day) and implementing a dynamic price tariff is currently still likely to be too high in relation to the behavioural changes that would be incentivised. Moreover, expansion measures are much quicker to achieve at these network levels and economical enough to make the introduction of dynamic injection tariffs not absolutely necessary.

The question of which producing network users should pay a dynamic network tariff also has to be answered in parallel to the case of the consuming network users: essentially, all network users whose behaviour has or could have an influence on the (scope of the) congestion. In the view of the Ruling Chamber, the network levels downstream of the congested network level must also pass on the price signal and impose the dynamic energy-based tariffs that are judged sensible.

Questions

- How exactly must a dynamic network tariff be designed to incentivise producer behaviour that is beneficial to the network (avoiding congestion) in an effective and efficient way?
- Do you agree that congestion management costs can and should be used to form network tariffs with an incentive function with sensible economic leverage?
- How must a dynamic network tariff be designed so as not to influence the marketing of generating installations (in the learning phase) but still to do justice to the objectives of the incentive function?
- How quickly can a dynamic energy-based price be started for producers? 2029 as for storage facilities, because as for this network user group, the requirement of 15-minute metering already exists?
- How should coordination with the redispatching processes look in order to create an incentive free of contradictions?
- How strongly regional should the dynamic tariffs be to send precise signals for the operation of renewable energy installations?
- Especially in the lower voltage levels, it may be assumed that the currently growing congestion may be regarded as rather temporary and comparably quick to resolve. The question thus arises of whether it makes sense to introduce a complex system of dynamic injection tariffs to address congestion at these levels too?

- Is there a need for a symmetrical, positive or negative dynamic price signal on both sides of the congestion in order to incentivise additional generation behind the congestion?
- Which options for the introduction of injection tariffs do you consider preferable:
 - Option 1: focus on incentive function for deliberate behavioural change using effective dynamic network tariffs, even with the risk of overreactions, and possibly subsequent adjustments by lowering the dynamic network tariffs?
 - Option 2: dynamic network tariffs starting low in the introductory and learning phase, even with the risk of not fully relieving the congestion and possibly subsequent adjustments by raising the dynamic network tariffs?