

Dear Eustream team,

With respect to Final consultation document on information referred to in Article 26(1) of the Commission Regulation (EU) 2017/460 of 16 March 2017 establishing a network code on harmonised transmission tariff structures for gas we would like to inform you on the following on behalf of Naftogaz Trading Europe AG and Naftogaz Slovakia s.r.o.

The Consultation document refers to tariff setting starting from January 2027. As members of Naftogaz Group we are interested in utilizing Eustream capacity for exit to Ukraine and at entry to Slovakia, especially in winter season. However, even with current tariffs Slovak direction is generally less competitive than alternative supply routes – such as Poland, Hungary, Romania, which is demonstrated by relatively low usage capacity of Budince IP in 2025/26 winter. More specifically, Slovakia and Poland are competing routes for transmission from Germany, which is an important direction of sourcing gas for Ukraine.

With this in mind and aiming to enhance our fruitful and mutually beneficial cooperation we kindly suggest considering the following steps to make the tariff impact less adverse and to retain and enhance the commercial attractiveness of using the Slovak transit system.

- Review the approach used during the benchmarking and align the proposed tariff closer the tariffs in neighboring countries – Poland, Hungary, Austria, Czech Republic, Ukraine, which are all significantly lower than both current and proposed tariff.
- Consider lowering the short-term multipliers, for example: quarterly 1.1, monthly 1.25, daily and WD 1.5.
- Consider introducing a discount for pure transit without access to VTP, e.g. for Lanzhot – Budince and Baumgarten – Budince direction.

We believe that implementing these measures will result in higher utilization of Slovak gas transmission system for cross-border transmission, ultimately resulting in better revenues for Eustream.

Thank you,

With our utmost respect,

Naftogaz Trading Europe AG and Naftogaz Slovakia s.r.o. – members of Naftogaz Group, Ukraine