



To the attention of: Mr. Martin Krivda
Eustream
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Paris, 04/12/2025

Subject: ENGIE's response for the consultation on the Tariff Methodology Changes proposed for Slovakia

ENGIE appreciates the opportunity to participate in this consultation on network usage charges for entry and exit points of the Slovakian transmission network. We wish to express our significant concerns regarding the proposed changes presented by Eustream which, if adopted, will negatively impact our future capacity bookings in Slovakia.

Current tariff period is running from 01/01/2023 until 01/01/2027. ENGIE notices that this is the second consultation on tariff increase in the running tariff period and it raises questions about the predictability of the tariffs.

The current consultation, conducted from October 7 to December 7, 2025, **comes very late**, with implementation scheduled for January 1, 2026. The deadline is very short and not compliant with the NC TAR regulation. Reservation for the running period were already done and such a drastic change in the tariff during the running gas year is not acceptable.

Furthermore, ENGIE fails to recognize what change has occurred in transportation flows that were not evoked in the last consultation period (March 2024) which already resulted in a three-fold tariff increase as of 01/01/2025. As every TSO in the region, Eustream faces the same geopolitical challenges: **there was no significant change to the political situation since the 1st of January 2025**, all elements were previously acknowledged: Russian transit stopped on January 1st, 2025. Starting from December 1st, the increase in new capacities available at Velke Zlievce will coincide with this tariff increase and calls for more perspective to see the positive effects rather than the opposite.

As the consultation document correctly points out under point 3.1.2.2, Eustream transmission tariffs are already the **highest in the region**, not to mention non-transmission charges (variable fees) that are also amongst the most expensive in the European Union. Any further increase of tariff will make this route even more uncompetitive and will divert the flow to other countries.

These increased tariffs, if confirmed, would be unsustainable and uncompetitive for the Slovakian market and create an important risk for the security of supply at the regional level. Most of the market participants will be reluctant to book capacities on the Slovakian transmission network on longer term



maturities and the short-term will be used only as last resort. Subsequently, the Slovakian end-customers will be the ones which will suffer mostly from this sharp increases.

It is noted that the consultation process is scheduled to conclude on 7 December, with the new tariff slated for implementation on 1 January 2026. ENGIE believes that a decrease on certain transmission points would significantly increase the revenues of the TSO.

We strongly urge the authorities to postpone the tariff increase until October 1, 2026, providing market participants sufficient time to adapt their transportation strategies.

Yours sincerely,

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