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Subject: consultation regarding the reference price methodology for access to the transmission network and gas transmission in the Slovak Republic

LLC Gas TSO of Ukraine welcomes the possibility to participate in Eustream's consultations regarding the reference price methodology for access to the transmission network and gas transmission in the Slovak Republic and to provide its feedback.

According to the published Final Consultation Document, a significant increase of reference prices is proposed already from 1 January 2026 till 31 December 2027, namely by 70% compared with the current ones. In our view, such increase, in case of adoption by the NRA, will have detrimental effect on cross-border gas flows, jeopardizing utilization of the respective interconnection points by market participants. Given that for the interconnection points with Ukraine (Budince and Velke Kapusany) monthly and quarterly multipliers are higher comparing to the respective multipliers, which are applied at interconnection point with the EU countries, potential increase of tariffs for monthly and quarterly capacity for IPs with Ukraine will be even bigger, if multipliers remain at the current level.

Comparison of transmission tariffs for alternative gas transportation routes to Ukraine shows that Slovak route is among the most expensive ones even with current tariffs, which are applied since 1 January 2025.

Historically, Slovakia was one of the main directions for transportation of gas to Ukraine. For example, in 2020, the Slovak share in total entry gas flows was more than 60%, while in 2021-2024 it maintained the role of either the main or the second biggest import route to Ukraine in terms of volumes. However, in 2025 (after the previous tariffs revision) the share of SK route dropped to around 20%. Meanwhile, the utilization rates of other directions rose.

At the same time, during 2024-2025, cross-border capacities on entry points towards Ukraine were increased significantly, giving the market participants more options and expanding their flexibility in terms of import routes to Ukraine.

In this regard, the proposed increase of Eustream's transmission tariffs could deteriorate the competitiveness of the Slovak directions further, which could result in lower utilization of the SK-UA capacities and respectively could lead to lower revenues. On the contrary, in case of flexible tariff setting the existing infrastructure of SK-UA route could become commercially attractive for network uses.



Given the above, we propose considering possible incentives which would make the route more competitive with alternative ones and would encourage more active usage of SK-UA interconnection points.

Yours sincerely,

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