

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.

As we understand, the Consultation document refers to tariff setting starting from January 2026. As members of Naftogaz Group we are interested in utilizing Eustream capacity for exit to Ukraine and at entry to Slovakia, especially in first quarter of 2026, as well as storage exit and entry services. However, even with current tariffs Slovak direction is generally less competitive than alternative supply routes – such as Poland, Hungary, newly introduced Route 1 product. For example, cost of monthly exit capacity from Poland and Hungary is usually at around 1 EUR/MWh or less, whereas in case of Slovakia as of now it is around 2.7 EUR/MWh, set to increase to 4.4 EUR/MWh. The increase at entry points would be similar.

Another issue is that this tariff increase would come less than 1 month before the start of respective tariff period, meaning that for EU points quarterly auctions for Q1 have already passed.

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 delaying the introduction of new tariffs to October 2026 (if the new tariffs are higher than current ones).
- 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 Naft