



PPSA.GG.12-12.2025

Warsaw, 2025-12-08

Comments on the Final Consultation Document on information referred to in Article 26(1) of the TAR NC and on the Methodology for setting the tariffs for the access to the transmission network and natural gas transmission.

1. Entry/Exit split.

Currently, eustream a.s. applies a 50:50 revenue split between entry and exit points, which is standard in systems where natural gas transit predominates. However, under the current market conditions in Slovakia this split does not reflect the actual flows profile. Russian gas transit has practically ceased and the system mainly handles imports of natural gas, as well as supplies to the domestic customers.

The published data ([ENTSOG - TP](#)) indicates that in the last 365 days, the ratio of exports to imports was approximately 0.449, meaning that exports accounted for approximately 31% of total flows (in the corresponding period from December 2023 to November 2024, exports accounted for approximately 44% of the total, and earlier approximately 42%). The data confirms the predominance of imports over exports.

Therefore, we propose reflecting the difference between import and export volumes by assigning greater share (more than 50%) of entry costs instead of adopting a 50:50 split.

2. Transmission cost benchmark

Eustream's methodology allows for tariff adjustments based on other operators (TSOs) benchmarks. Unfortunately the proposed benchmark is unreliable. The methodology contains values concerning countries/TSOs with completely different technical and market conditions (e.g., Denmark, Belgium, France). In addition, numerous values representing German system, distorts the statistics.

It should be emphasized, that values adopted by eustream, a.s. have a significant impact on tariff level results and cause unjustified increase of tariff rates.

In our opinion, the transmission systems of Austria and the Czech Republic are appropriate reference systems for Slovakian tariffs - due to the size of the country, its historical role in transit, as well as tariffs structure changes in recent years due to a shift in natural gas supply directions.

The development of a reliable benchmark creates the possibility of significant tariff reduction and the potential to increase gas flows in the future.

TSO	Value (EURcent/MWh/100km)
CZ TSO	25,5
BE TSO	27,4
DK TSO	123,2
NL TSO	158,7
HU TSO	28
DE TSO	121,4
DE TSO	53,2
DE TSO	78,8
DE TSO	83,1
DE TSO	47,5
PL TSO	77,8
AT TSO	56,1
IT TSO	49,3
BG TSO	46,3
FR TSO	149,3
SI TSO	115,1
RO TSO	57,2

3. Assumptions regarding the capacity of the Výrava point.

The calculations assume zero capacity reservation at the Výrava point, which is incorrect in the context of the actual capacity reservations, e.g. product Q1 2026. We suppose similar situation may apply to other interconnectors.

Capacity reservations made at individual points should be reflected in the capacity reservation forecasts provided by eustream, a.s. and ultimately should be taken into account in calculated tariff rates.

4. Admissibility and justification of tariff changes.

Eustream, a.s. points to extraordinary circumstances which, as stated further in the document, mean the suspension of gas transit from Russia to Western Europe through Ukraine due to the armed conflict. („*At the same time, according to Article 12(3)(b) of the TAR NC it is possible to adjust the tariffs, in case of exceptional circumstances, also within the current tariff period*”). However, it is difficult to consider the argument as extraordinary, as the restriction of flows started in early 2022 and was practically completely suspended from January 1, 2025ⁱ. Consequently, eustream, a.s. should have taken these circumstances into account in the standard tariff-setting process, as was the case in 2024. Therefore no changes in the tariff should be made now. We propose to start consultation of any potential tariff changes in the standard procedure.

According to the information contained in the consultation document (“*The reference price methodology and parameters presented in this Consultation document are subject to the approval by ÚRSO. Unless and until a relevant decision approving them is issued by ÚRSO, the tariffs presented in this document are indicative and non-binding*”), and having regard to Article 27(4) of the NC TAR Regulation, the Slovak regulatory authority should issue a binding decision approving the proposed rates within five months of the end of the final consultation, i.e. by May 5, 2026, at the latest. Furthermore, in accordance with Article 29 of the NC TAR, the tariff can be calculated in accordance with the approved tariff setting method. Therefore, it is impossible to introduce the revised tariffs from January 1, 2026. Such actions cause uncertainty and unpredictability in the application of tariffs by market participants,

including customers. It is therefore proposed to take measures to issue decisions in this regard in advance to ensure that network users and their customers can plan and participate for them in annual auctions.

5. General comments on methodology.

- Another significant increase in transmission rates calculated on a year-on-year basis.
- An attempt to maintain the same level of regulated revenues despite a very significant decrease in the volume of gas transmitted.
- An attempt to transfer almost all costs to other gas market participants, including companies involved in international gas trading.

Cost comparison:

a 70% increase compared to current rates, with the increase to take effect on January 1, 2026.

ⁱⁱ <https://www.eustream.sk/en/about-us/press/news/zastavenie-toku-zemneho-plynu-z-ukrajiny-vstupnom-bode-velke-kapusany-ukrajinsko-slovenskej-hranici.html>