Energy Traders Europe comments to the proposed 2026 gas transport tariffs

Energy Traders Europe welcome the opportunity to comment on the GTS-proposed revision of tariff levels in 2026. We note that a considerable increase in tariff levels (over 50% on average) has been envisaged for the 2nd year in a row. While we appreciate the justification given, we note that the hikes in tariff levels suggest that the **current approach to cost reconciliation is not sustainable and against the spirit of NC TAR**. If the transport tariff growth rate is continued, **it's levels will damage the liquidity of TTF**. This can be particularly true as ETS2 becomes fully operational. We therefore urge the authorities to critically review the applicable methodology (including the depreciation periods) and benchmark the transmission costs against competing routes.

Regarding the current tariff structure proposed, we note that this time the **revenues from the inter-TSO compensation scheme (ITC)** with BBL **have not been accounted for at all**. We understand that the potential revenue stream may be difficult to anticipate, yet we underline the need for having a stable and predictable tariff, as also raised in a recent letter of the Minister of Climate and Green Growth[1].

We would also appreciate further information on how auction premia from 2022 are being distributed over the years, particularly since the Method Decision 2022-26 suggests that they should have been attributed to year T+2. We further note that surplus attributed to 2026 is offset in full by an unspecified ("Other") cost category. In this context and in view of yet another substantial increase in tariff levels, we would like to ask **whether a better way of anticipated costs and past over-recoveries distribution could be considered.**

Going forward, **some measure containing the year-over-year tariff increase will also be needed** to allow for a degree of stability and predictability. Current volatility of the tariff levels will further deter network utilization, including the Dutch import infrastructure, putting further pressure on future tariff levels. We therefore call on the Ministry of Economic Affairs and the ACM to carefully reconsider the tariff methodology and the impact it may have on gas market competitiveness.

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[1] https://www.tweedekamer.nl/kamerstukken/brieven_regering/detail?id=2025Z04386&did=2025D10238