CONSULTATION RESPONSE

Consultation Response to the Proposed Merger of Transmission Systems and the Approach to Tariffs for the Years 2027-2031

Brussels, 01 November 2025 - Energy Traders Europe welcomes the opportunity to comment on the proposed changes brought about by the upcoming merger of the national gas transmission system and Yamal transit pipeline. This is a very welcome change, which we have long advocated for. We also appreciate the consistent approach to multipliers and seasonal factors, as proposed already for 2026. **Given the shortness of our feedback, we allow ourselves to tie in our remarks on both the ITC and multipliers in a single document.**

Key messages

1. We appreciate the consistent approach to setting the tariff for the merged system, particularly since the impact on the single entry/exit tariffs remains modest.
2. We support the non-reintroduction of seasonal factors and simplifying of the remaining multipliers as proposed already for 2026.
3. We endorse the proposed phase-out of the LNG discount, since it creates an uneven playing field between the incumbent and other prospective importers.
4. **We advocate for the non-introduction of discounts on renewable and low-carbon gases – the measure does not incentivise uptake of these gases and will also distort the market**.

Detailed comments

The proposed merger of the two networks is a positive development that will allow Poland to operate a single entry-exit system, as envisaged under EU rules. This will create more opportunities for cross-border exchanges and reduce the costs of moving gas between the national system and the transit pipeline. We also appreciate the very modest envisaged impact on tariffs, the level of which overall unfortunately, remain high.

While we are critical of multipliers, we welcome the consistent approach to applying discounts and multipliers (as proposed already for 2026) and appreciate the non-application of seasonal factors. Moreover, the attribution of the same level of multipliers for all quarters and months of the year are very welcome. We also appreciated the reduction of discounts on entries from the LNG terminal as anticipated, which will help levelling the playing field.

Our one point of concern relates to Gaz-System's assumption on the reintroduction of a discount for transporting renewable and low-carbon gases at interconnection points after the expiry of the current derogation. We emphasize that these discounts provide no additional incentives for renewable and low-carbon gas producers and more likely benefit shippers that trade gas across borders. Considering that the discounts will be reallocated between entries and exits again, network users will need to pay that premium, and the mechanism may well prove to be distortive without having any positive impact in terms of decarbonisation. We therefore suggest maintaining the derogation and request that Gaz-System recalculates the tariff accordingly.

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