

Energy Traders Europe Comments on the Tariff Methodology Changes Proposed For Slovakia

Brussels, 20 November 2025 – *Energy Traders Europe* welcomes the opportunity to comment on the proposed changes to the tariff methodology design and would like to raise the following points:

Key messages

1. The proposal envisages a **second revision of transmission costs in the middle of the 2023-2027 tariff period. This is not in line with the NC TAR** and undermines trust in the Slovak methodology, further discouraging long term bookings.
2. **Benchmarking application according to the proposed methodology is not in line with NC TAR** and adversely affects the transparency of reference price calculations.
3. Even if exceptional circumstances were found to justify tariff adjustments, **such changes should have been consulted on in early 2025, sufficiently in advance of the annual auctions.**

Detailed comments

1. Tariff Changes at Short Notice Are not in line with NC TAR and Undermine Eustream's Ability to Compete Over Transit Flows

Although the 2024 tariff methodology consultation document has warned about potential subsequent need to revise the tariffs, we note that **the revision was announced very late and envisages a major increase in transmission costs as of January 2026.** Eustream justifies this proposal with Article 12(3)(b) of NC TAR, which allows adjustments based on exceptional circumstances. However, the status of Russian gas transit flows has been known for a long time and was already identified as a risk last year. It is therefore unclear why this consultation is being conducted only now, long after

the auctions for annual capacities have concluded. **As an association of network users, we have explicitly asked for an advance publication of any adjustment to the tariffs our consultation response last year¹.**

We note that Eustream identifies its important role in the EU gas system, while at the same time **little effort is put into ensuring the attractiveness of the Slovak system as a transit country.** Last minute changes to the tariff levels, such as the ones consulted on now, discourage booking of capacities and may well undermine the TSO's financial position rather than reinforce it, especially in the longer-term. Moreover, abrupt tariff changes risk raising end-user prices, weakening industrial competitiveness, and reducing market liquidity by making the Slovak gas system less attractive to suppliers, traders, and shippers.

2. The Application of Benchmarking Is Not in line with NC TAR and Its Impact on the TSO's Ability to Recover Costs Is Unclear

Explanations provided on the way benchmarking was conducted under the consulted methodology suggest that the exercise has resulted in a revision of tariffs for the entire system without referring to any concrete competing routes. **This is not in line with the provisions of NC TAR, which stipulates that (Art. 6(4)a) benchmarking can be applied to specific points in direct competition with points of other TSOs.** Same interpretation can be found in ENTSO-G's Implementation Document².

We also reiterate that, as was the case in the 2024, the **consultation document does not explain how the benchmarking exercise affects Eustream's ability to recover its costs.** It is therefore very difficult to establish how relevant the "raw reference price" was before benchmarking was applied. Further, the proposal also fails to meet TAR NC transparency requirements, as it does not explain how capacity-based

¹ <https://www.energytraderseurope.org/documents/response-to-the-slovak-consultation-on-tariffs/>

² https://www.entsog.eu/sites/default/files/2019-10/entsog_TAR_NC_2017_2nd_ed_update_1910_web.pdf

revenues relate to underlying infrastructure costs, leaving key assumptions – such as zero utilisation at Velké Kapušany and Výrava – unverifiable and potentially unrealistic.

3. The Timeline Envisaged Suggests Few Changes Can Still Be Made

We note that the consultation process is set to run until 7th December, while the application of the new tariff is set already for 1 January 2026. This leaves very little room for an analysis of the feedback received and hardly any advance notice for the market participants to adapt the new prices that will be approved. **We therefore urge the authorities to at least postpone the application of the tariff until the forthcoming gas year**, allowing market participants to adjust.

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