



REPUBLIC OF CROATIA

Unofficial translation

**CROATIAN ENERGY
REGULATORY AGENCY**
Ulica grada Vukovara 14
10000 Zagreb

CLASS: 391-21/24-01/4

REG. NO.: 371-04-25-9

Zagreb, 7 November, 2025

Having regard to the Article 28(1) of the Commission Regulation (EU) 2017/460 from 16 March 2017 establishing a network code on harmonised transmission tariff structures for gas, in accordance with Article 78(7) of Directive (EU) 2024/1788 of the European Parliament and of the Council of 13 June 2024 on common rules for the internal markets for renewable gas, natural gas and hydrogen, amending Directive (EU) 2023/1791 and repealing Directive 2009/73/EC, and Article 11(1)(9) of the Act on the Regulation of Energy Activities ("Official Gazette" No. 120/12 and 68/18) the Croatian Energy Regulatory Agency has adopted on the 28th session of the Board of Commissioners held on October 31 and November 7, 2025, the following

DECISION

on discounts, multipliers and seasonal factors for 2026

1. Multipliers and seasonal factors shall be adopted in accordance with Commission Regulation (EU) 2017/460 from 16 March 2017 establishing a network code on harmonised transmission tariff structures for gas, as follows:

- the level of multipliers for non-yearly standard capacity products:

<i>Capacity products</i>	<i>Quarterly</i>	<i>Monthly</i>	<i>Daily / within-day</i>
Multipliers	1.2	1.3	2.5

- the level of seasonal factors for non-yearly standard capacity products, by months:

<i>Capacity products</i>	<i>Quarterly</i>	<i>Monthly</i>	<i>Daily / within-day</i>
January	1.3750	1.6154	1.6154
February	1.3750	1.3077	1.3077
March	1.3750	1.0769	1.0769
April	0.7917	0.8462	0.8462
May	0.7917	0.6923	0.6923
June	0.7917	0.6538	0.6538
July	0.9167	0.7308	0.7308
August	0.9167	0.7692	0.7692
September	0.9167	0.9231	0.9231
October	1.3750	1.0769	1.0769
November	1.3750	1.3077	1.3077
December	1.3750	1.6154	1.6154

2. The levels of multipliers and of seasonal factors set out in Point 1 of this Decision shall be applied to all gas transmission system entry and exit points of the Republic of Croatia.
3. A discount of 90% shall be applied at entry into the transmission system from the gas storage system and discount of 100% at exit from the transmission system and entry of gas into the gas storage system.
4. The 15% discount for entry into the transmission system from the LNG terminal is abolished.
5. An *ex-post* discount shall be applied for calculation of reserve prices for standard capacity products for interruptible capacity, where *ex-post* compensation paid for each day on which an interruption occurred shall be equal to three times the reserve price for daily standard capacity products for firm capacity.
6. The application of the provisions of Article 18(5)(b) of Regulation (EU) 2024/1789 of the European Parliament and of the Council of 13 June 2024 on the internal markets for renewable gas, natural gas and hydrogen, amending Regulations (EU) No 1227/2011, (EU) 2017/1938, (EU) 2019/942 and (EU) 2022/869 and Decision (EU) 2017/684 and repealing Regulation (EC) No 715/2009, which do not require the application of discounts on transmission tariffs for gas from renewable sources and for low-carbon gas, is hereby determined.
7. The elements set out in this Decision shall be applied with the beginning of a new tariff period which begins on January 1, 2026.
8. In accordance with this Decision, an appropriate amendment of the Methodology for determining the amount of tariff items for gas transmission ("Official Gazette" No. 79/20 and 36/21).
9. On the date of entry into force of this Decision, the Decision on discounts, multipliers and seasonal factors in accordance with Commission Regulation (EU) 2017/460 from 16 March 2017 establishing a network code on harmonised transmission tariff structures for gas, CLASS: 310-03/18-02/3, Reg. No.: 371-04-19-8, of 23 May 2019, shall cease to be valid.
10. This Decision shall enter into force on the date of its adoption.
11. This Decision shall be published on the website of the Croatian Energy Regulatory Agency.

Statement of grounds

The Croatian Energy Regulatory Agency (hereinafter: HERA), as a national regulatory authority acting in accordance with Article 78(7) of Directive (EU) 2024/1788 of the European Parliament and of the Council of 13 June 2024 on common rules for the internal markets for renewable gas, natural gas and hydrogen, amending Directive (EU) 2023/1791 and repealing Directive 2009/73/EC (hereinafter: Directive (EU) 2024/1788) and as a party designated for conducting a regular consultations on discounts, multipliers and seasonal factors, in accordance with Article 17(1) of the Act on the Regulation of Energy Activities ("Official Gazette", No 120/12, 68/18) and in accordance with Article 28 of Commission Regulation (EU) 2017/460 of 16 March 2017 establishing a network code on harmonised transmission tariff structures for gas (hereinafter: Regulation (EU) 2017/460), adopts a Decision on discounts, multipliers and seasonal factors (hereinafter: Decision).

This Decision was preceded by a Consultation on discounts, multipliers and seasonal factors in accordance with Article 28 of Regulation (EU) 2017/460 (hereinafter: Consultation), which was

initiated based on the decision, CLASS: 391-21/24-01/4, Reg. No.: 371-04-25-1, adopted by HERA at the 11th session of the Board of Commissioners held on April 10, 2025.

The Consultation covers the regulatory period from 2026 to 2030, with 2026 representing a new tariff period for which the amounts of tariff items for gas transmission are determined.

The consultation was conducted from 10 April to 10 June 2025, simultaneously with the Consultation on the reference price methodology in accordance with Article 26 of Commission Regulation (EU) 2017/460 establishing a network code on harmonised transmission tariff structures for gas. Three comments were received from energy undertakings during the Consultation.

Upon completion of the Consultation and acting in accordance with Article 78(7)(a) of Directive (EU) 2024/1788, considering the responses received within the Consultation and the provisions under Article 28(3)(a) and (b) of Regulation (EU) 2017/460, HERA shall adopt a reasoned decision on all elements referred to in Article 28(1) of Regulation (EU) 2017/460 and publish it.

Furthermore, pursuant to Article 11(1)(9) of the Act on the Regulation of Energy Activities (“Official Gazette”, No. 120/12 and 68/18) and Article 94(1)(5) of the Gas Market Act (“Official Gazette”, No. 18/18 and 23/20), and in accordance with this Decision, HERA will make appropriate amendments to the Methodology for determining the amount of tariff items for gas transmission (“Official Gazette”, No. 79/20 and 36/21; hereinafter: Methodology).

1. Calculation of level of multipliers and seasonal factors for non-yearly standard capacity products

The reference price methodology determines capacity-based transmission tariffs for calculating reference prices for yearly standard capacity product in order to derive reference prices applicable for the annual standard capacity product, i.e. the corresponding tariff items for gas transmission.

For non-annual standard capacity products, reserve prices are calculated by applying the level of the appropriate multiplier and seasonal factor to the reference price, identically for all homogeneous groups of points.

Revenues of the transmission system operator obtained from capacity bookings should cover the justified costs incurred by carrying out the energy activity of gas transmission, whereas those revenues are not only affected by the value of booked capacity, but also by a duration of capacity booking. Accordingly, the transmission system operator offers capacities at all entries and exits in the Republic of Croatia as:

- a. annual standard capacity products - a specified amount of capacity for all gas days in a given gas year (starting from 1 October)
- b. quarterly standard capacity product - a specified amount of capacity for all gas days in each quarter (starting from 1 October, 1 January, 1 April or 1 July)
- c. monthly standard capacity product - a specified amount of capacity for all gas days in each month (starting from the 1st day of each month)
- d. daily standard capacity product - a specified amount of capacity for one gas day
- e. intraday standard capacity product - a specified amount of capacity for a specified period within one gas day (starting from a specified hour within a gas day until the end of that gas day).

The calculation of seasonal factors set out in this Decision is implemented in accordance with Article 15, paragraphs 2 to 6 of Regulation (EU) 2017/460, based on the planned average monthly gas flow quantities for the years 2026-2030 and applying a power factor of 2, which, in accordance with Article 15(3) (e) of Regulation (EU) 2017/460 should be no less than 0 and no more than 2, and the resulting value represents the seasonal factor on a monthly basis.

During the public consultation, participants expressed comments regarding the proposed abolition of the 15% discount on entry into the transmission system from the liquefied natural gas (LNG) terminal, as well as the proposed multiplier levels for short-term products. Certain energy undertakings opposed the removal of the discount on entry into the transmission system from the LNG terminal (hereinafter: LNG terminal) in order to maintain lower reference/reserve prices at that entry point compared to other entry points in the transmission system. One energy undertaking proposed the application of the maximum multiplier levels permitted under Regulation (EU) 2017/460, with the aim of incentivising market participants to contract annual capacity products to a greater extent than non-annual ones, which would, in that case, be more expensive.

Furthermore, HERA forwarded to the Agency for the Cooperation of Energy Regulators (hereinafter: ACER) the consultation documents concerning the proposed methodology for determining the reference price for gas transmission services pursuant to Article 26 of Regulation (EU) 2017/460. These documents also include sections related to adjustments of transmission tariffs at entry and exit points of the transmission system, including discounts.

In its conclusions on the public consultation, ACER also addressed the proposed removal of the discount on entry into the transmission system from the LNG terminal, assessing that the reasons for its abolition, as well as the results of its application, are justified. ACER emphasised that Regulation (EU) 2017/460, through the provision on regular and mandatory five-year consultations on the elements of the reference price methodology, ensures the flexibility of all such elements, including discounts.

Discounts at specific points of the transmission system are exceptionally allowed for limited and clearly defined purposes. In the case of the LNG terminal and the objective of ensuring security of supply, following five years of implementation, the high level of terminal capacity utilisation, and the planned investment in capacity expansion, the continued application of the discount can no longer be considered necessary. In conclusion, ACER assessed that the proposed methodology, including the removal of the discount, does not distort cross-border trade.

Based on the analysis of all comments received, and taking into account ACER's opinion as well as the necessary measures to ensure transparent and non-discriminatory transmission access tariffs applicable to all users without distinction, as prescribed by Directive (EU) 2024/1788, and considering the measures promoting the use of all gas infrastructure, HERA did not accept the proposed comments.

Accordingly, the levels of seasonal factors, which remain unchanged compared to the consultation documents, are presented in Table 1.

Table 1 The level of seasonal factors, by months

Capacity products	Quarterly	Monthly	Daily / within-day
January	1.3750	1.6154	1.6154
February	1.3750	1.3077	1.3077
March	1.3750	1.0769	1.0769
April	0.7917	0.8462	0.8462
May	0.7917	0.6923	0.6923
June	0.7917	0.6538	0.6538
July	0.9167	0.7308	0.7308
August	0.9167	0.7692	0.7692
September	0.9167	0.9231	0.9231
October	1.3750	1.0769	1.0769
November	1.3750	1.3077	1.3077
December	1.3750	1.6154	1.6154

Furthermore, in accordance with the provisions of Article 13(1) of Regulation (EU) 2017/460, multiplier levels have been determined for the calculation of the reserve price for non-annual standard capacity products, as follows: for quarterly capacity products, a multiplier of 1.2; for monthly capacity products, a multiplier of 1.3; and for daily and within-day capacity products, a multiplier of 2.5.

The product of the applicable multipliers and seasonal factors used to calculate the reserve price for non-annual standard capacity products, by month, is presented in Table 2.

Table 2 The product of multiplier and seasonal factors for non-yearly standard capacity products, by months

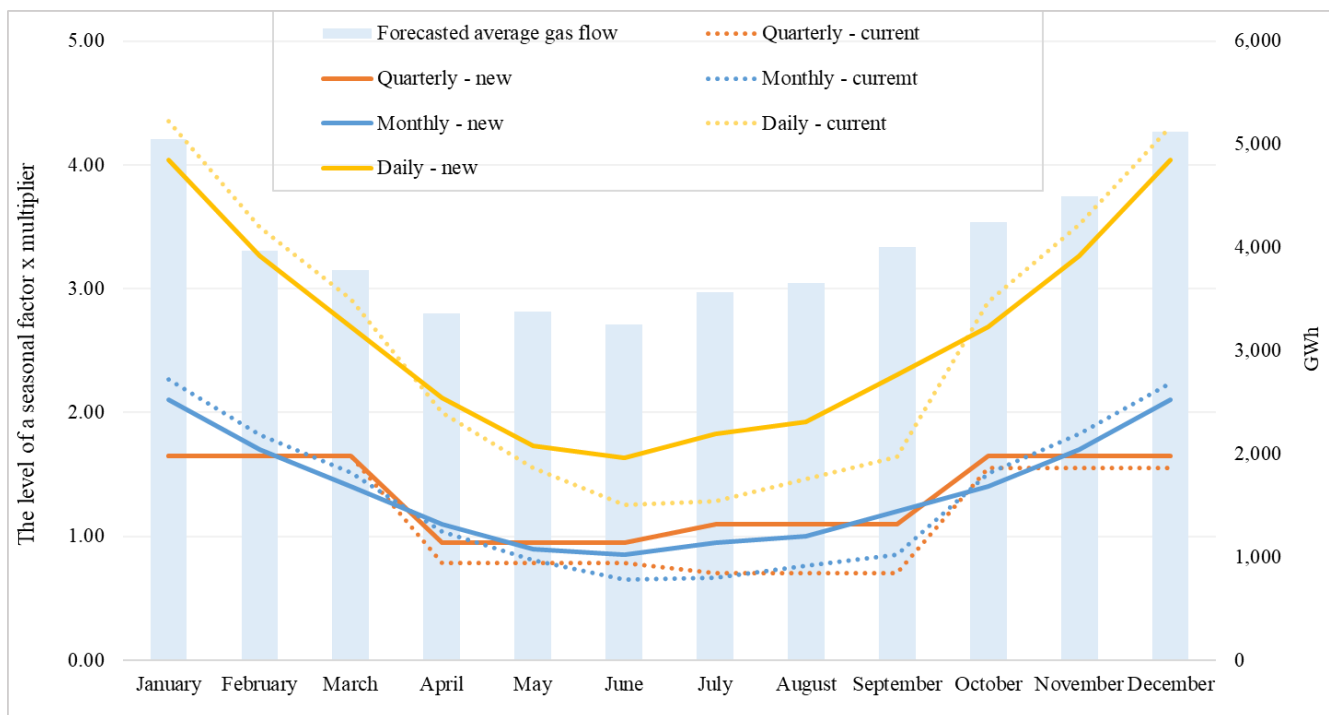
Capacity products	Quarterly	Monthly	Daily / within-day
January	1.6500	2.1000	4.0385
February	1.6500	1.7000	3.2693
March	1.6500	1.4000	2.6923
April	0.9500	1.1000	2.1155
May	0.9500	0.9000	1.7308
June	0.9500	0.8500	1.6345
July	1.1000	0.9500	1.8270
August	1.1000	1.0000	1.9230
September	1.1000	1.2000	2.3078
October	1.6500	1.4000	2.6923
November	1.6500	1.7000	3.2693
December	1.6500	2.1000	4.0385

Table 3 presents a comparison of the average values of the currently applicable products of multipliers and seasonal factors with the products of multipliers and seasonal factors adopted by this Decision, adjusted from a monthly to an annual level. The same comparison, by month, is shown in Figure 1.

Table 3 The average amount of product of multiplier and seasonal factors and coefficients reduced to the annual level, for non-yearly standard capacity product

Capacity products	Quarterly	Monthly	Daily / within-day
Current values	1.173	1.329	2.557
According to this Decision	1.3375	1.3667	2.6282
Decision/Current	14.0%	2.8%	2.8%

Figure 1 Overview of products of multipliers and seasonal factors and coefficients reduced to the annual level, for non-yearly standard capacity product, by months



2. Calculation of reserve prices for non-yearly standard capacity products for firm capacity

When applying seasonal factors, reserve prices for quarterly standard capacity products, for monthly standard capacity products and for daily standard capacity products are calculated in accordance with the following formula:

$$P_{tm,m,d} = M_{tm,m,d} \times SF_{tm,m,d} \times \left(\frac{T_{\Omega,i}}{365} \right) \times D$$

Where:

- $P_{tm,m,d}$ - is the reserve price for the respective standard capacity product (EUR/kWh/day),
- $M_{tm,m,d}$ - is the level of the multiplier corresponding to the respective standard capacity product,
- $SF_{tm,m,d}$ - is the seasonal factor,
- $T_{\Omega,i}$ - is the reference price, for the appropriate entry into or exit from the transmission system (EUR/kWh/day),
- D - is the duration of the respective standard capacity product expressed in gas days.

The reserve prices for within-day standard capacity products are calculated according to the following formula:

$$P_{un} = M_{un} \times SF_{un} \times \left(\frac{T_{\Omega,i}}{365} \right)$$

Where:

- P_{un} - is the reserve price for the within-day standard capacity product (EUR/kWh/day),
- M_{un} - is the level of the corresponding multiplier,
- SF_{un} - is the seasonal factor,
- $T_{\Omega,i}$ - is the reference price, for the appropriate entry into or exit from the transmission system (EUR/kWh/day).

For leap years, the formulas shall be adjusted so that the figure 365 is substituted with the figure 366.

3. Discounts at entry and exit points of the gas storage system

Croatia has one underground natural gas storage facility, operated by the energy undertaking Podzemno skladište plina Ltd.

The gas storage represents a significant interest for the Republic of Croatia, with the primary goal of increasing security and reliability of gas supply through its efficient operation and active usage of contracted storage capacities. In addition to that, the usage of the underground gas storage provides the energy undertakings with the ability to efficiently manage their portfolios of energy products, which is reflected upon the price of the gas supply for users.

In order to avoid double charging of fees at the entry and exit points of gas storage facilities, Article 9 of Regulation (EU) 2017/460 stipulates the possibility of applying a discount of at least 50% to capacity-based transmission tariffs at the entry and exit points of gas storage facilities.

Following the above, and with the aim of ensuring system flexibility and security of supply, the following discounts are determined for transmission tariffs at the entry and exit points of the transmission system connected to the gas storage system:

- a 90% discount at entry into the transmission system from the gas storage system;
- a 100% discount at exit from the transmission system and entry of gas into the gas storage system.

In accordance with the currently applicable Methodology, the established discount levels remain unchanged.

4. Discount at other points in the transmission system

Regulation (EU) 2017/460, in addition to provisions regarding the adjustment of transmission tariffs at points connected to gas storage facilities, also provides for the possibility of applying discounts to the relevant capacity-based transmission tariffs at entry points from the LNG terminal and at entry and exit points of the system that were constructed to end the isolation of Member States with regard to their gas transmission systems.

During the current, third regulatory period 2021–2025, in accordance with the Decision on discounts, multipliers, and seasonal factors pursuant to Commission Regulation (EU) 2017/460 of 16 March 2017 establishing network codes on harmonised transmission tariff structures for gas, dated 23 May 2019, as well as the currently applicable Methodology, a 15% discount on gas transmission for contracted firm capacity on an annual basis at the entry from the LNG terminal has been applied.

Considering that, since the commencement of operations of the LNG terminal, the terminal capacity has been highly contracted and the existing LNG terminal capacities are almost fully booked until the gas year 2036/2037, and that the upgrade of LNG terminal in October 2025 significantly increases entry capacities into the transmission system, thereby enhancing the security of gas supply in Croatia and neighbouring countries, HERA does not consider it necessary to continue the application of this discount.

Furthermore, ACER, in its analysis of the consultation proposal and the received comments regarding the abolition of this discount, as well as in its conclusions on the public consultation, noted that, although a changed discount level may affect the economic activity of market participants, discounts are determined for a clear purpose and their application is carried out in accordance with regulatory provisions. In this case, Article 27(5) of Regulation (EU) 2017/460 provides that consultation and a decision on the applied methodology for calculating the reference price must be repeated at least every five years. Additionally, Articles 28(1)(c) and 28(2) of Regulation (EU) 2017/460 stipulate that the level of the discount under Article 9(2) must be subject to consultation before each tariff year. Finally, Article 9(2) of Regulation (EU) 2017/460 provides that discounts on transmission tariffs at entry points from the LNG terminal may be applied for the purpose of promoting security of supply. Since the existing LNG terminal capacities are almost fully contracted until the gas year 2036/2037, maintaining the discount would no longer serve the purpose of promoting security of supply.

In conclusion, the level of applied discounts may be changed with a certain frequency and is applied to increase security of supply when justified; therefore, it cannot be assumed that it will remain unchanged over time.

5. Calculation of reserve price for standard capacity products for interruptible capacity

According to Regulation 2017/460, Article 16(4), the national regulatory authority may decide to apply an *ex-post* discount instead of the recommended *ex-ante* discount, provided that in the previous gas year there were no capacity interruptions due to physical congestion at interconnection points. In the case of applying an *ex-post* discount, network users are compensated only after actual interruptions occur.

Since in the gas transmission system of the Republic of Croatia, in the previous gas year 2024/2025, there were no capacity interruptions at interconnection points due to physical congestion, HERA determines the application of an *ex-post* discount for the calculation of the price for contracted standard capacity products for interruptible capacity for the year 2026.

The *ex-post* compensation for each day on which an interruption occurs is equal to three times the reserve price for daily standard capacity products for firm capacity, and is calculated according to the following formula:

$$P_{pr,ex-post} = 3 \times M_d \times SF_d \times \left(\frac{T_{\Omega,i}}{365} \right) \times kap_{pr}$$

Where:

- $P_{pr,ex-post}$ - is the *ex-post* discount for interruptible capacity (EUR),
- M_d - is the multiplier for the daily standard capacity product,
- SF_d - is the seasonal factor for the daily standard capacity product,
- $T_{\Omega,i}$ - is the reference price, for the appropriate entry into or exit from the transmission system (EUR/kWh/day),
- kap_{pr} - is the amount of the determined capacity interruption, representing the partial or total amount of the contracted interruptible capacity at a specific entry into or exit from the transmission system for an individual network user on a specific gas day (kWh/day).

6. Discount for transmission tariffs for gas from renewable sources and for low-carbon gas

According to Article 18 of the Regulation (EU) 2024/1789 of the European Parliament and of the Council of 13 June 2024 on the internal markets for renewable gas, natural gas and hydrogen, amending Regulations (EU) No 1227/2011, (EU) 2017/1938, (EU) 2019/942 and (EU) 2022/869 and Decision (EU) 2017/684 and repealing Regulation (EC) No 715/2009 when setting tariffs, discounts are applied on gas tariffs from renewable sources and for low-carbon gas.

According to Article 18, paragraph 5 of the Regulation (EU) 2024/1789, regulatory authorities may decide not to apply discounts or to lay down discounts lower than those laid down in paragraphs 1 and 4 of the Article 18, provided that such a derogation is in line with the general tariff principles and in particular the principle of cost-reflectiveness, where one of the following criteria is met:

- (a) the derogation is necessary for the efficient operation of the transmission system, to ensure a stable financial framework for existing investments or to avoid undue cross-subsidies, distortion to cross-border trade or an ineffective inter-transmission-system-operator compensation mechanism,
- (b) the application of discounts laid down in paragraphs 1 and 4 is not necessarily due to the degree of advancement of the roll-out of renewable gas and low-carbon gas in the Member State concerned or the existence of alternative support mechanisms for scaling-up the use of renewable gas or low-carbon gas.

On those grounds, HERA decides to apply the provisions of Article 18, paragraph 5 (b) of the Regulation (EU) 2024/1789.

7. Conclusion

HERA considers that the discounts, multipliers, and seasonal factors determined by this Decision enable the efficient contracting and utilisation of transmission system capacity by system users, while simultaneously ensuring the security of supply for gas customers. On the other hand, the application of different reserve prices depending on system load through seasonality encourages greater utilisation of contracted capacities and, at the same time, ensures sufficient revenue predictability for the transmission system operator.

Therefore, specific seasonal factors with their corresponding multiplier levels, provided that the reservation of required capacities is optimised in accordance with the individual customer portfolio, enable lower financial burden for transmission system users who reserve capacities on a quarterly, monthly, or daily and within-day basis. Additionally, through the defined levels of discounts, multipliers, and seasonal factors, higher system utilisation is facilitated, better planning of non-annual capacity reservations is achieved, and greater savings for transmission system users are realised compared to contracting solely annual capacities.

In conclusion, during the consultation procedure, no positions from national regulatory authorities of directly connected Member States were received that HERA would need to consider in adopting this Decision.

By adopting this Decision HERA considers that all aspects in accordance with Article 28(3)(a) and (b) of Regulation (EU) 2017/460 have been taken into account, respectively:

(a) for multipliers:

- i. facilitate a balance between short-term gas trading and long-term benefits for the signal for efficient investment in the transport system;
- ii. the effect on revenue from transport services and its collection.

(b) for seasonal factors:

- i. the effect of facilitating efficient and effective use of infrastructure;
- ii. the need for reserve prices to be more cost-effective.

Further to the foregoing, it has been decided as in points 1 to 10 of the operative part of this Decision.

Pursuant to Article 27(9) of the Act on the Regulation of Energy Activities it is stipulated that individual decisions taken by the Board of Commissioners of HERA in exercising public authorities are announced on the HERA's website, and therefore, it has been decided as in Point 11 of the operative part of this Decision.

PRESIDENT OF THE BOARD OF COMMISSIONERS

Nikola Vištica, Ph.D.