



Croatian Energy Regulatory Agency
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Summary of responses to 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

Introduction

The Croatian Energy Regulatory Agency (HERA) published on 10 April 2025 a public consultation on the Proposal of the Methodology for Determining the Reference Price of Gas Transmission Services in accordance with Article 26 of Commission Regulation (EU) 2017/460 establishing a network code on harmonised transmission tariff structures for gas (Regulation 2017/460).

All interested parties were welcomed to participate in the Consultation by providing their comments, opinions and statements. The consultation procedure included filling out the consultation form and emailing it to savjetovanje@hera.hr. The participants were given the possibility to submit their comments as public response with the full name of the representatives of the interested party, or anonymously, without publishing the name of the interested party.

The consultation was held in period from 10 April 2025 to 10 June 2025.

During the consultation HERA received following two anonymous submissions concerning the proposal of the Reference Price Methodology:

- [Participant 1](#) (available only in English)
- [Participant 2](#) (available only in Croatian)

In accordance with the provisions of Article 26, paragraph 3 of Regulation 2017/460, a summary of the received comments is provided below, structured according to the chapters of the consultation, while individual submitted responses are available over above indicated hyperlink.

Summary of received comments by chapter of the consultation document

General remarks on the document 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

One subject opposes the proposed removal of discounts on transmission tariffs at the entry point from the Liquefied Natural Gas terminal (hereinafter: LNG terminal), where a 15% discount is currently applied during current regulatory period. The subject further states that entities have contracted long-term capacities for the LNG terminal and the transmission system under existing rules, and that the proposed changes to the discount, seasonal factors, and multipliers would constitute a retroactive application of the regulation. Furthermore, it is argued that abolishing the discount would be contrary to Regulation 2017/460 and could potentially jeopardize the security of supply of the Republic of Croatia.

According to the same entity, the increase of transmission tariffs potentially threatens Croatia's energy position as a regional energy hub and reduces the competitiveness of gas supply from the LNG terminal. The participant in the consultation requests that the entry tariffs from the LNG terminal should remain at current levels or even be further reduced, in order to preserve the competitiveness of this supply route and encourage further infrastructure investments. Also, the participant in the consultation requests that the exit tariffs at the interconnection points should remain at current levels or even be further reduced to enable stable and predictable exports to neighbouring countries. In case of the need to increase transmission tariffs, the entity requests that such increases is to be allocated to users within the Republic of Croatia, since, according to the participant, they benefit most in terms of security of supply.

3.2 Homogeneous groups of points and system capacities

The consultation participant comments that the planned contracted capacities at the entry and exit points of the transmission system for the period 2026–2030, as shown in Table 11 of the consultation document, are overly optimistic compared to the amount of annual capacities contracted in 2023 and 2024.

4.1 Indicative reference prices for the period 2026 – 2030

The consultation participant believes that the indicative amounts of the reference price for contracted firm capacity on an annual basis for entry and exit points of the transmission system for the period 2026 – 2030 in Table 18 do not inform the public and interested transmission system users about the expected price of contracted firm capacities on an annual basis during the regulatory period 2026 – 2030.

4.2 Comparison of reference prices applicable in the current tariff period and reference prices for the period 2026 – 2030

The consultation participant believes that the indicative amounts of the reference price for contracted firm capacity on an annual basis for entry and exit points of the transmission system for the period 2026 – 2030 in Table 19 do not inform the public and interested transmission system users about the expected price of contracted firm capacities on an annual basis during the regulatory period 2026 – 2030.

Summary of comments received outside the scope of the consultation document

The entity comments that the duration of the regulatory period of five years is excessively long for Croatian gas business conditions, taking into account recent developments in recent years that have affected and continue to affect both the use of the transmission system and economic and financial conditions, as well as parameters used in the calculation of the allowed revenue, which apply to the entire regulatory period.

Comments were also made regarding the method for determining the allowed revenue of the transmission system operator, particularly concerning the possibility of applying an economic efficiency analysis of regulated assets when determining allowed revenue, justifying the aforementioned in such a way that all the operator's assets were invested reasonably and justifiably, and that the subsequent determination of such investments as unjustified or unreasonably invested, is in contradiction to the official decisions of the competent state bodies and HERA itself.