Croatian Energy Regulatory Agency

Consultation on discounts, multipliers and seasonal factors in accordance with Article 28 of Commission Regulation (EU) 2017/460 establishing a network code on harmonised transmission tariff structures for gas

This document was adopted on 19 May 2026 by the Decision on launching the consultation on discounts, multipliers and seasonal factors, pursuant to Article 28 of Commission Regulation (EU) 2017/460 establishing a network code on harmonised transmission tariff structures for gas, Class: 391-21/26-01/2, Reg. No.: 371-04-26-1

Zagreb, May 2026

CONTENT

1. THE PURPOSE OF CONSULTATION

The purpose of the consultation is to collect information on the interests, opinions and suggestions of the concerned public and of the national regulatory authorities of all directly connected Member States in order to raise the level of understanding and acceptance of the proposed discounts, multipliers and seasonal factors.

Based on the Act on the Regulation of Energy Activities („Official Gazette“, No. 120/12 and No. 68/18), the Croatian Energy Regulatory Agency (further in text: HERA) as a national body with public authority for regulating energy activities in the Republic of Croatia conducts consultations with the concerned public.

The public consultation is conducted in accordance with Article 28 of Commission Regulation (EU) 2017/460 from 16 March 2017, establishing a network code on harmonised transmission tariff structures for gas (Text with EEA relevance) (further: Regulation 2017/460) regarding multiplier levels, seasonal factor levels and calculations referred to Article 15 of Regulation 2017/460, as well as the level of discounts referred to in Article 9 paragraph 2 and Article 16 of Regulation 2017/460.

In 2025 HERA carried out a public consultation on the proposal of a methodology for determining the reference price of gas transmission services (further: reference price methodology) in accordance with Article 26 of Regulation 2017/460 and then, taking into account the prescribed analysis of the consultation documentation conducted by the Agency for the Cooperation of European Energy Regulators (further: ACER) and ACER's assessment of the compliance of the proposed methodology with Regulation 2017/460, adopted the relevant Decision on the elements of the methodology for determining the reference price for gas transmission services for the regulatory period 2026-2030. Pursuant to the aforementioned Decision, in 2025 HERA adopted the corresponding Amendments to the Methodology for determining the amount of tariff items for gas transmission.

In addition to the aforementioned consultation on the proposal of the reference price methodology, in 2025 HERA simultaneously carried out a public consultation on discounts, multipliers and seasonal factors in accordance with Article 28 of Regulation 2017/460 and then adopted the relevant Decision on discounts, multipliers and seasonal factors for 2026, i.e. for the current tariff period.

Current consultation on discounts, multipliers and seasonal factors, in accordance with Article 28 of Regulation 2017/460, is now being conducted for the next tariff period, i.e. for 2027.

2. 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 the yearly standard capacity product, while **reserve prices for non-yearly standard capacity products** are calculated based on the reference price and by using the multipliers' levels and seasonal factors, where applicable.

The cost of capacity bookings refers to the part of costs incurred by providing transmission services, whose level is affected not only by the amount of booked capacity but also by the duration of the capacity booking period, which may be:

- **Quarterly –** capacity contracting on a quarterly level
- **Monthly –** capacity contracting on a monthly level
- **Daily –** capacity contracting on a daily level
- **Within-day –** within-day capacity contracting on an hourly level

The calculation of seasonal factors is based on the planned monthly gas flow quantities for the year 2027, with the application of the potential coefficient amounting to 2, in accordance with Article 15, paragraphs 2 to 6 of Regulation 2017/460, as it is shown in the calculation model available on HERA's website, published alongside this document. In the mentioned calculation HERA maintained the same planned monthly gas flow quantities used for 2027 as in the previous Decision on discounts, multipliers and seasonal factors for 2026.

This was done due to the upgrade of the LNG terminal during the previous year 2025, it was not in use during all months of 2025, and therefore the data on the realised monthly gas flow quantities for 2025 could not serve as a relevant basis for considering a possible correction of the projection of monthly gas flow quantities for 2027.

The proposed levels of multipliers, in accordance with the Article 13 of the Regulation 2017/460 shall fall within the following range:

a) For quarterly and monthly standard capacity products the level of respective multiplier shall not be lower than 1 or higher than 1.5;

b) For daily and within-day standard capacity products the level of respective multiplier shall not be lower than 1 or higher than 3;

Accordingly, below is a proposal of the calculated multipliers and seasonal factor levels to be applied at all entry and exit points of the Republic of Croatia's transmission system.

For the following tariff period, i.e. for 2027, it is proposed to maintain the same level of multipliers for the current tariff period, i.e. for 2026.

Table 1. Proposed level of multipliers for non-yearly standard capacity products

Capacity products	*Quarterly*	*Monthly*	*Daily/ Within-day*
Level of multipliers	1.2	1.3	2.5

Table 2. Proposed levels of seasonal factors by months

Seasonal factors	*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

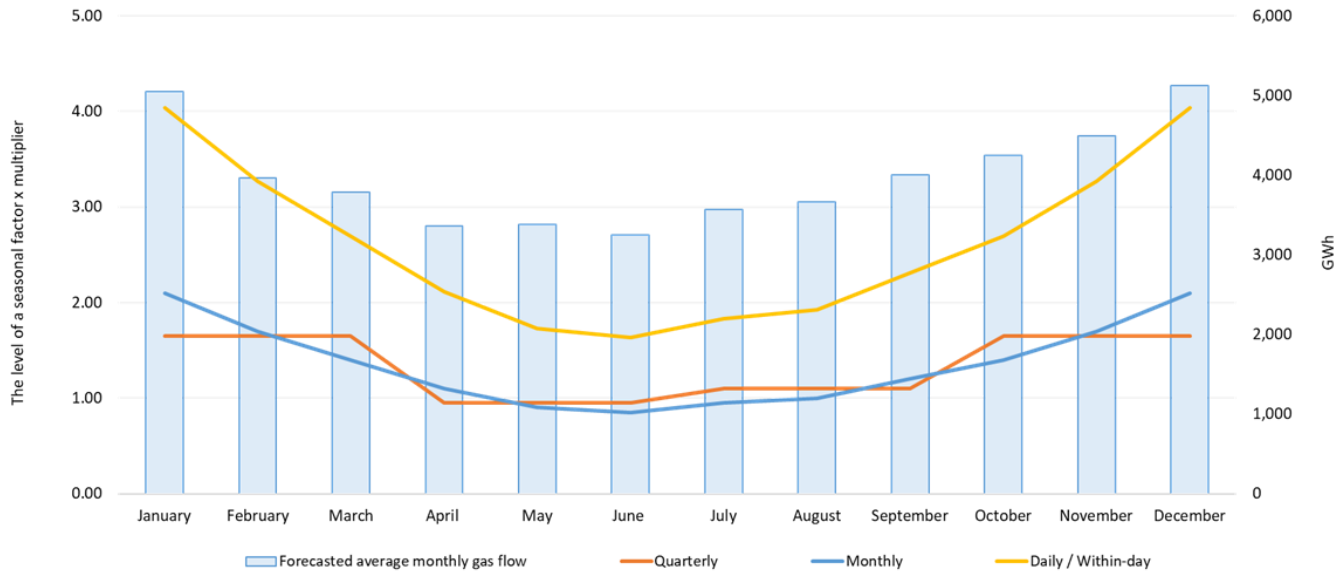
The aim of the proposed seasonal factors is to encourage the reservation and usage of transmission capacities in periods of lower gas consumption. At the same time, they should result in reserve prices which proportionately reflect costs of operating the transmission system and should help lower the risk of physical and contractual congestion.

For quarterly standard capacity products, the seasonal factors are determined between the lowest and the highest level of corresponding seasonal factors applicable to three relevant months.

Table 3. Product of respective multiplier and monthly level of seasonal factor for non-yearly standard capacity products

Product of multiplier and seasonal factors	*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
Average	**1.3375**	**1.3667**	**2.6282**

Figure 1. Overview of the product of multipliers and seasonal factors for non-yearly standard capacity product, by month



3. 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:

$$P_{st} = M \times SF \times (T/365) \times D$$

Where:

P_{st} is the reserve price for the respective standard capacity product,
M is the level of the multiplier corresponding to the respective standard capacity product,
SF is the seasonal factor,
T is the reference price,
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:

$$P_{ust} = M \times SF \times (T/365)$$

Where:

P_{ust} is the reserve price for the within-day standard capacity product,
M is the level of the corresponding multiplier,
SF is the seasonal factor,
T is the reference price.

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

4. PROPOSED 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 storage is technologically connected only to the main gas pipeline of the Republic of Croatia, its technical storage capacity is 4.7725 TWh of natural gas, and its primary purpose is to ensure the security of gas supply in the heating season, as well as the seasonal balancing of the gas system.

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.

For the purpose of maintaining the flexibility of the system and security of supply for the following tariff period, i.e. for 2027, it is proposed to maintain the discounts for transmission tariffs on connecting points with the underground gas storage as follows:

- 90% discount for entry into the transmission system from the gas storage system,
- 100% for exit from the transmission system and entry of gas into the gas storage system, to avoid double charging for gas transmission to and from the gas storage system.

5. PROPOSED AMOUNTS OF DISCOUNT FOR RESERVE PRICES CALCULATION FOR STANDARD CAPACITY PRODUCTS FOR INTERRUPTIBLE CAPACITY

According to Regulation 2017/460, Article 16, paragraph 4, the national regulatory authority may decide to apply an *ex-post* discount (instead of the recommended *ex-ante* discount) if there was no termination of capacity due to physical congestion in the previous gas year. In case of usage of *ex post* discounts, network users are compensated after the actual interruptions incurred.

Since there was no capacity disruption due to physical congestion in the gas transmission system of the Republic of Croatia in 2025 , HERA proposes to maintain the application of *ex-post* discounts for the calculation of the non-yearly standard capacity products for interruptible capacity, where *ex-post* fees paid for each day when interruption occurred shall be equal to the three times the reserve price for daily standard capacity product for firm capacity.

6. PROPOSED AMOUNTS OF 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 (Text with EEA relevance) 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 proposes the application of Article 18, paragraph 5 (b) of the Regulation (EU) 2024/1789.

7. CONCLUSION

This Consultation, through proposed level of discounts, multipliers and seasonal factors, provides relevant signals for optimal reservation of available transmission capacities and efficient further development of the transmission system, in the way that it encourages reservation and usage of transmission capacities out of heating season and at the same time considering the stability of operator's incomes and business operations.