

**Consultation document in accordance with Article 26 of Commission Regulation  
(EU) 2017/460 of 16 March 2017 establishing a network code on harmonised  
transmission tariff structures for gas**

JULY 2026



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## 1. Purpose of the Consultation Document

This consultation document, prepared in accordance with Article 26 of Commission Regulation (EU) 2017/460, is intended to ensure transparency and to involve stakeholders in the process of determining the reference price methodology for the use of the gas transmission system. The consultation presents the proposed methodology, the key parameters for determining tariffs, and the expected effects on individual groups of network users. The document enables interested parties to submit comments and proposals, which are taken into account in shaping the final solutions, thereby contributing to a non-discriminatory, cost-reflective and transparent determination of tariffs.

Taking into account Regulation (EC) No 715/2009 of the European Parliament and of the Council of 13 July 2009 on conditions for access to the natural gas transmission networks and repealing Regulation (EC) No 1775/2005 (hereinafter: Regulation 715/2009), Commission Regulation (EU) 2017/460 of 16 March 2017 establishing a network code on harmonised transmission tariff structures for gas (hereinafter: Commission Regulation (EU) 2017/460) established the Network Code on Harmonised Transmission Tariff Structures for Gas.

Commission Regulation (EU) 2017/460 provides that the national regulatory authority, i.e. the Energy Agency, or the transmission system operator, as determined by the national regulatory authority, shall carry out a consultation on the reference price methodology, to be repeated at least every five years. On the basis of Articles 26 and 27 of Commission Regulation (EU) 2017/460 and a decision of the Energy Agency, the public consultation on the methodology for setting tariff items for the use of the gas transmission system in Slovenia is carried out by the gas transmission system operator, the company Plinovodi d.o.o. (hereinafter: company Plinovodi).

## 2. Invitation to Participate

The company Plinovodi publishes the consultation document in accordance with Article 26 of Commission Regulation (EU) 2017/460 in Slovenian and in English, whereby, in the event of any discrepancy, the Slovenian text shall prevail. It invites all interested parties to prepare comments and proposals on the published consultation document, which may be submitted no later than

25 September 2026

in electronic form using the enclosed form in Annex 1, to the e-mail address [skr@plinovodi.si](mailto:skr@plinovodi.si).

In accordance with the requirements of Commission Regulation (EU) 2017/460, the transmission system operator will publish the responses received on its website once the consultation has concluded.

### 3. Summary

The Slovenian gas transmission system has been in operation since 1978 and supplies gas to most Slovenian industrial and urban centres, with the exception of the Obalno-kraška region, Bela Krajina and parts of Notranjska and Dolenjska. In connection with the supply of the Obalno-kraška region, in 2025 the company Plinovodi began construction of the M6 Ajdovščina-Lucija pipeline, which represents the central part of a new transmission connection towards the coastal area. By mid-2026, an operating permit had already been obtained for the section from Ajdovščina to Sežana. The system is connected to other transmission systems through three border interconnection points: at Ceršak with Austria, at Rogatec with Croatia, and at Šempeter with Italy. Flow in both directions is possible at the Šempeter interconnection point and at the Rogatec interconnection point. A new cross-border interconnection between Slovenia and Hungary is also planned, with the aim of reducing the risk of supply disruptions, enabling greater flexibility, and improving access to different sources and storage facilities.

The transmission system serves 12 distribution system operators and 129 directly connected industrial users. Despite the extensive transmission network, gas consumption compared to other energy sources remains below the European average. In 2025, the annual quantities transported for domestic use increased compared with 2024 (9.4 TWh) and amounted to around 10.4 TWh of gas. The volume of gas for cross-border transport amounted to around 0.13 TWh and remains strongly dependent on market conditions in neighbouring countries, the new gas source at the Krk terminal, temperature conditions and demand for electricity.

The reference price methodology proposed in this document is the existing matrix method, which the transmission system operator has used since the introduction of the entry-exit point system. In determining reference prices, an extensive system of parameters is taken into account: the replacement value of the transmission system (the replacement value of the transmission system is taken to be the acquisition value of the transmission system), the allocation of the portion of eligible costs relating to capacity-based transmission services, and the load on individual parts of the transmission system at the time of the system peak load. The parameters used ensure a more appropriate allocation of system usage costs than the capacity weighted distance reference price methodology (hereinafter: the CWD methodology), since the tariff items reflect the actual costs of the individual parts of the transmission system.<sup>1</sup>

The matrix method takes into account the anticipated costs and complexity of the transmission system, is non-discriminatory, and prevents cross-subsidisation. On the basis of the available data and the simplified model published on the website, network users can calculate indicative average reference prices for cross-system<sup>2</sup> and intra-system<sup>3</sup> use of transmission capacity.

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<sup>1</sup> An explanation of the comparative index and the assessment of the allocation of costs is provided in Sections 4.4 and 4.6.

<sup>2</sup> An explanation of the term is provided in Annex 5.

<sup>3</sup> An explanation of the term is provided in Annex 5.



The proposed ratio between revenue from capacity-based tariffs at all entry and exit points is based on the specific nature of actual use of the Slovenian transmission system, where the majority share represents the supply of gas to end users in Slovenia.

In addition to revenue based on capacity tariffs at all entry and exit points, the transmission system operator will cover part of its revenue from transmission services through a commodity-based transmission tariff, namely for gas used for own consumption, and revenue from non-tariff services based on measurement service tariffs. The methodology for determining the reference prices remains the same as before.

We will carefully review the responses received in the form of proposals and comments and take them into account as appropriate.

Matija Bitenc, MSc

General Manager

Aleš Gruden

Member of the Management Board

## 4. Proposed Reference Price Methodology

### Reference: Article 26(1)(a) of Commission Regulation (EU) 2017/460

The transmission system operator uses the matrix method to determine reference prices and intends to continue using it in the future period as well.

#### 4.1 Matrix Method

##### 4.1.1 Description of the Matrix Method

### Reference: Article 26(1)(a) of Commission Regulation (EU) 2017/460

The transmission system operator determines entry and exit tariff items in a way that takes into account the peak loads of the individual sections and entry/exit points of the transmission system, as well as the replacement value of the transmission system, which are reflected in the appropriate allocation of the costs of the transmission system.

The matrix method for calculating tariff items is based on the assumption that gas can be transported from any point in the transmission system to any other point in the transmission system. In this way, an appropriate allocation of system usage costs across the entire transmission system is ensured, regardless of which point of the transmission system is being used, taking into account the technical characteristics of the transmission system, the assets invested by the transmission system operator, and the estimated use of the transmission system by users.

On the basis of the anticipated costs of the transmission system operator, determined by the regulatory framework in accordance with the applicable Act determining the methodology for setting the regulatory framework for transmission system operator for gas, as adopted by the Energy Agency, and recovered by revenue from capacity-based transmission services, the cost per unit of peak load is calculated, which forms the basis for calculating tariff items, taking into account the forecast and estimate of future bookings of transmission capacity.

The transmission system operator determines entry and exit reference prices in the form of tariff items.

The transmission system operator determines entry and exit tariff items separately for border points and for points within the Republic of Slovenia. The indicative reference price is expressed in EUR/kWh/day.

A description of how transmission charges are calculated across the transmission system is provided in Annex 2.

##### 4.1.2 Explanation of the Parameters and Assumptions Used

### Reference: Article 26(1)(a)(i) of Commission Regulation (EU) 2017/460

The replacement value of the transmission system is taken into account as an input parameter for determining reference prices. The replacement value of the transmission system is taken to be the acquisition value of the transmission system. For 2027, the

replacement value amounts to EUR 810.6 million and is equal to the acquisition value of the transmission system's assets as of 31 December 2023. Eligible costs are determined on the basis of the replacement value of each individual part of the transmission system. The allowed revenue is allocated to each individual part of the transmission system in accordance with its share of the cost structure. In order to determine the reference price, it is also necessary to take into account the peak load of each individual part of the system. The peak load of an individual part of the transmission system is the actual load on that part on the day of the peak load of the entire system.

Data on the forecasted and estimated booked capacity at individual points are also used to determine reference prices based on the matrix methodology.

*Table 1: Forecast and Estimate of Booked Transmission Capacity for Domestic Users and Cross-Border Transport for 2025, in kWh/day*

| Entry or exit point |                                | Forecast and estimate of booked transmission capacity for 2025* |
|---------------------|--------------------------------|-----------------------------------------------------------------|
| Entry point         | Ceršak                         | 30,276,105                                                      |
|                     | Šempeter pri Gorici            | 13,111,175                                                      |
|                     | Rogatec                        | 8,313,490                                                       |
| Exit point          | Ceršak                         | 347,916                                                         |
|                     | Šempeter pri Gorici            | 445,020                                                         |
|                     | Rogatec                        | 1,281,887                                                       |
|                     | Slovenia - domestic exit point | 55,152,253                                                      |

\* average annual capacity in which short-term products are recalculated to an annual level

The allowed revenue, i.e. the regulated annual revenue, is defined in the Act on the Methodology for Determining the Regulatory Framework of the Gas System Operator (Official Gazette of the Republic of Slovenia, Nos. 30/24, 50/25 and 16/26; hereinafter: the Act on the Methodology for Determining the Regulatory Framework) as the revenue for an individual year of the regulatory period from network charges collected for the use of the system and other revenue, and is intended to cover the eligible costs of the system operator. This corresponds to the concept of 'allowed revenue' in Article 3 of Commission Regulation (EU) 2017/460, which means the sum of revenue from transmission services and revenue from non-transmission services for the performance of the transmission system operator's services, for a given period within a given regulatory period, to which such a transmission system operator is entitled under a non-price cap regime and which is determined in accordance with Article 41(6)(a) of Directive 2009/73/EC of the European Parliament and of the Council of 13 July 2009 concerning common rules for the internal market in natural gas and repealing Directive 2003/55/EC (hereinafter: Directive 2009/73/EC).

The Energy Agency determines the allowed revenue in the procedure for granting approval to the regulatory framework, which the transmission system operator prepares for a regulatory period of three consecutive calendar years using the regulated annual revenue and regulated network charge methodology. Under the regulatory framework, the planned eligible costs are first determined. These consist of operating and maintenance costs, depreciation costs, and the regulated return on assets. In doing so, the Agency recognises only those costs determined according to the criteria set out in the Act on the Methodology for Determining the Regulatory Framework, taking into account, among other things, the efficiency factor, planned inflation, the acquisition value of assets, and the weighted average cost of capital. The sources for covering eligible costs are network charges, other revenue from the system operator's activities, and surpluses or deficits of network charges from previous years. Planned network charges are thus determined at the level of planned eligible costs, reduced by other revenue and taking into account deviations from the regulatory framework in previous years and any planned network charge deficit for the regulatory period, which may not exceed the level of the planned depreciation cost. In order to prevent abrupt changes in tariff items between individual years, the regulatory framework also provides for the smoothing of network charge tariff items across the years of the regulatory period. The part of the allowed revenue that is recovered by capacity-based transmission tariffs constitutes an input for determining the reference prices in this document. For 2025, the network charge for capacity-based transmission services amounts to EUR 44.7 million.

#### 4.1.3 Structural Presentation of the Gas Transmission System in Slovenia

**Reference: Article 26(1)(a)(i), 30(1)(a)(iv) of Commission Regulation (EU) 2017/460**

The Slovenian gas transmission system began operating in 1978 and has since been gradually expanded and upgraded. In 2014, the last major investment cycle was completed with the construction of the pipeline from the Austrian border at Ceršak to Vodice near Ljubljana, which, in addition to providing the additional transmission capacity required, improved the safety and reliability of the transmission system's operation. In 2021, through the construction of the Vodice-TE-TOL transmission pipeline, the company connected the new TE-TOL gas-steam unit in Ljubljana to the transmission system. In June 2025, the company began construction of the M6 Pipeline. For the section from Ajdovščina to Sežana, which represents the first phase of the new M6 transmission pipeline between Ajdovščina and Lucija, an operating permit was already obtained in mid-2026. The M6 project will connect Sežana to the Slovenian gas transmission system, thereby reducing the area's dependence on supply from Italy. Once construction is complete, users will be able to choose between different gas suppliers, which will increase market competitiveness. In order to enable an increase in transmission capacity from the direction of Italy, the Ajdovščina compressor station was expanded with a third compressor unit. In 2026, operation of the cross-border metering-regulating station (MMRP) at the interconnection point with Italy is being transferred from the existing MMRP Šempeter-Nova Gorica to the new MMRP Vrtojba. The Šempeter pri Gorici interconnection point will therefore have increased capacity by the end of 2026.

As the transmission system operator, the company Plinovodi ensures the safe and reliable operation of the transmission system through regular inspections and the regular performance of maintenance activities. We regularly monitor the condition of the transmission pipelines through route surveillance, internal inspections of the pipelines, various methods of external pipeline inspection, and continuous monitoring of operating parameters via the central control system. On the basis of preventive inspections and maintenance activities, we assess that the pipeline infrastructure is in very good operating condition, since we have so far had no operational problems that could not be managed within the scope of planned maintenance work.

At the time of publication of this document, there are no entry points within Slovenia. Consequently, the supply of gas to the Slovenian market is currently entirely dependent on imports. Gas is supplied to Slovenia from individual hubs of the European gas market. From Austria, gas physically flows via the Ceršak entry point, from Italy via the Šempeter entry point, and from Croatia via the Rogatec entry point. Access to LNG supplies has also been established via the entry points from Italy and Croatia.

In accordance with 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 (recast) (hereinafter: Regulation (EU) 2024/1789), the transmission system operator must enable network users to use transmission capacity separately at all entry and exit points of the system (under the so-called entry-exit point system). For the entry-exit point system to function successfully, the transmission system operator must ensure appropriate technical conditions, such as the removal of bottlenecks in the transmission system, since only in this way will it be possible to properly market and book capacity under this method and to enable capacity bookings at entry and exit points in various combinations.

**Table 2: Main Infrastructure of the Gas Transmission System in Slovenia**

| Infrastructure           |                                       | Status as at 1 January 2024              |
|--------------------------|---------------------------------------|------------------------------------------|
| Pipeline network         | Total                                 | 1,197 km                                 |
|                          | Pipelines with a diameter of 800 mm   | 167 km                                   |
|                          | Pipelines with a diameter of 500 mm   | 162 km                                   |
|                          | Pipelines with a diameter of 400 mm   | 212 km                                   |
|                          | Other pipelines of smaller diameters  | 656 km                                   |
| Facilities and equipment | Compressor stations (CS), total power | CS Kidričevo 10.5 MW, CS Ajdovščina 9 MW |
|                          | Cross-border stations                 | Ceršak, Rogatec, Šempeter pri Gorici     |

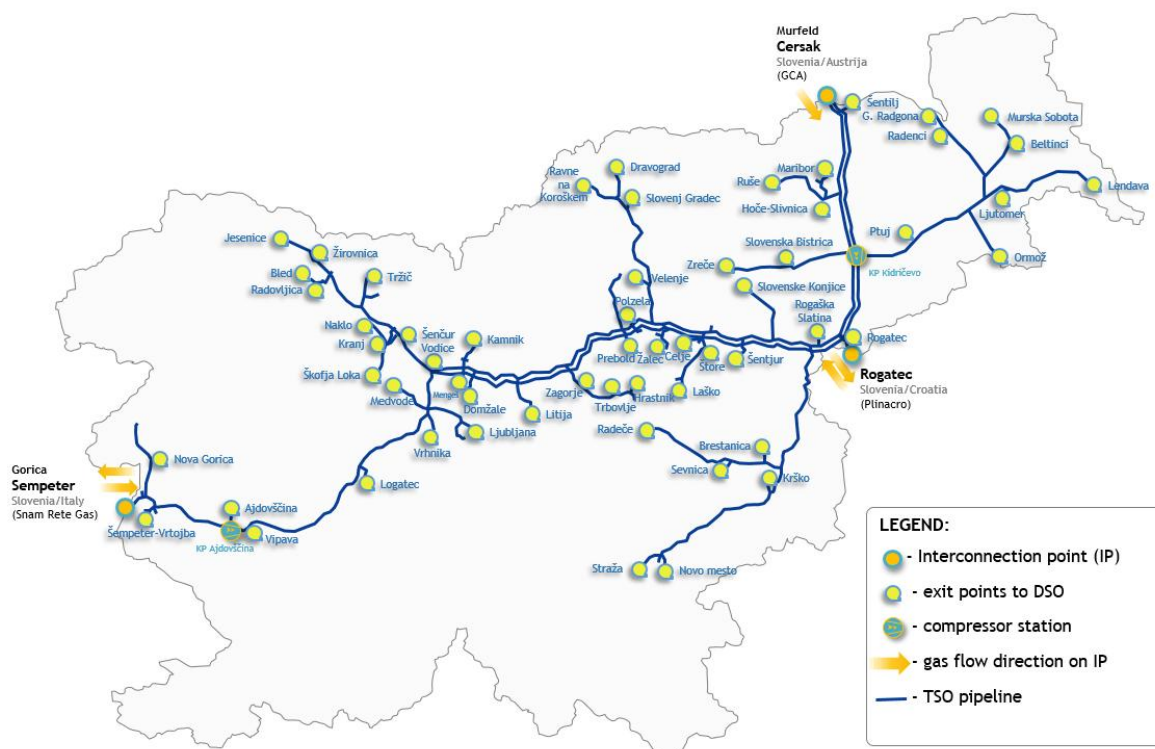
The Slovenian gas transmission pipeline system comprises 1,197 km of pipelines, compressor stations at Kidričevo and Ajdovščina, and 259 metering-regulating or other stations, and 298 off-take points. Equipment enabling the monitoring and maintenance of the system is installed at key locations in the gas transmission system. Remote monitoring and control functions are carried out using the information and telemetry system.

The gas transmission pipeline system connects most Slovenian industrial and urban centres, with the exception of the Obalno-kraška region (in 2025 the company Plinovodi began construction of the M6 pipeline between Ajdovščina and Lucija, which represents the central part of the new transmission link towards the coastal area), Bela Krajina, and parts of Notranjska and Dolenjska.

Supervision and control of the gas transmission pipeline system is carried out from the dispatching centre, which is connected to the dispatching centres of the transmission system operators of neighbouring countries, as well as with the system operators of distribution systems and major gas off-takers.

In 2025, the Slovenian gas transmission system transported 10.4 TWh of gas for domestic consumption and 0.13 TWh for cross-border transport purposes. At the time this document was prepared, there were no entry points within Slovenia, since Slovenia has no gas production injecting gas into the transmission system, no gas storage facilities, no LNG facilities, and no biomethane production facilities.

**Figure 1: Structural Presentation of the Slovenian Transmission System**



On the basis of Regulation (EU) 2024/1789 and 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 (recast) (hereinafter: Directive 2024/1788), regional networks are pipelines that are used primarily in the context of local gas distribution, or for domestic supply, and are not used for the transmission of gas to cross-border points. As can be seen from the diagram in Figure 2, the part of the transmission system used only by end users and distribution system operators connected to exit points within Slovenia is shown as the section between points D and E. This section is 759.2 km long, representing more than 63% of the entire gas transmission pipeline system.

#### 4.1.4 Determination of the Reference Price

Reference prices determined using the matrix method are determined through an optimisation process, the objective of which is to determine the minimum differences between the tariffs for individual entry or exit points and the costs attributable to the relevant part of the system.

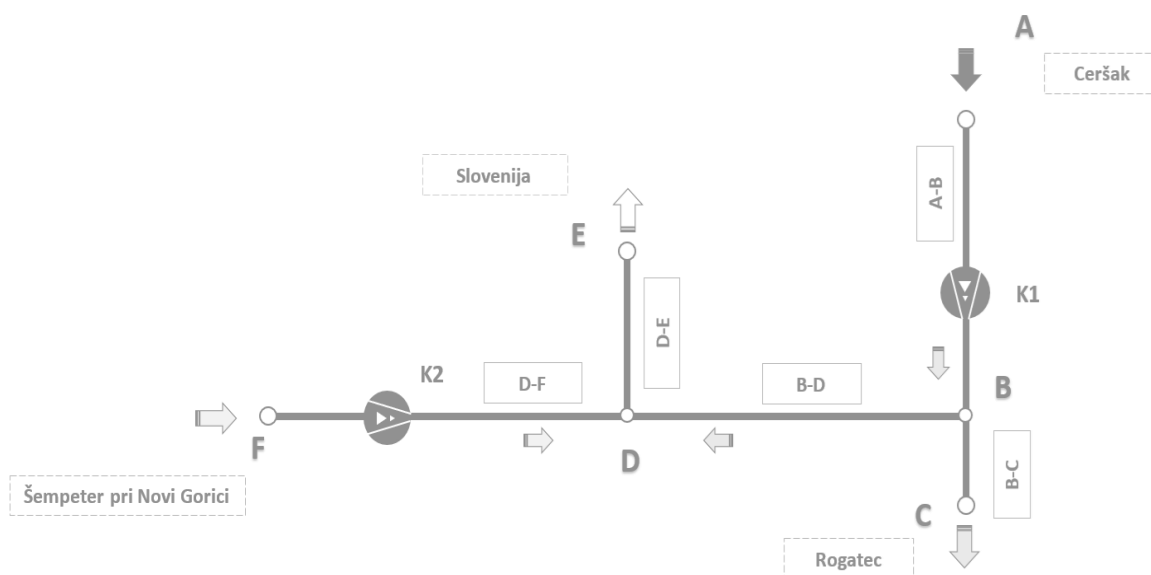
Reference prices based on the matrix method are determined so as to take into account:

- the replacement value of the transmission system,
- the allocation of the part of eligible costs relating to capacity-based transmission services, and
- the load of individual parts of the transmission system at the time of the peak load of the transmission system.

The replacement value of the transmission system is taken into account as an input parameter for determining reference prices. For 2025, the year for which reference prices are being determined, the replacement value amounts to EUR 810.6 million and is equal to the acquisition value of the transmission system's assets as of 31 December 2023. Eligible costs for 2025 are determined on the basis of the replacement value of each individual part of the transmission system.

Figure 2 shows the division of the transmission system into individual parts. In order to determine the reference price for each individual entry or exit point, it is necessary to determine the starting and ending point of the part of the transmission system with homogeneous characteristics. All costs of the transmission system in that part are subsequently attributed to the relevant entry or exit point on the basis of the peak load of that part of the system.

**Figure 2: Diagram of the Transmission System Showing the Parts of the System Whose Costs Are Attributed to Individual Points**



The part of the transmission system between points A and B represents part of the M1 and M1/1 main pipelines between MMRP Ceršak, i.e. the state border, and MMRP Rogatec. Point B represents a ‘junction’ from which gas can be transported further through the Slovenian transmission system towards the west or towards the Croatian transmission system. This part of the transmission system also includes the Kidričevo compressor station. The costs of this part of the transmission system are reflected in the price of the Ceršak entry point, as well as in other entry or exit points if this part of the route is used to transport gas to a user. Since on the day of peak system load all gas entered through points A and F and was transported to system users at the exit points, the costs of this route are reflected in all reference prices for exit points.

The transmission system between points B and C represents part of the M1 main pipeline, but only from point B, which represents MMRP Rogatec and constitutes a ‘junction’ from which gas can be transported further through the Slovenian transmission system towards the west or towards the Croatian transmission system. Point C represents the border point with Croatia. Costs arising on the B-C section are attributed to the reference price of the Rogatec point.

The section of the transmission system designated B-D, between points B and D, represents the M2 and M2/1 main pipelines between MMRP Rogatec and the Vodice metering-regulating station (MRP). At Vodice, the gas flow can be redirected in various directions. Section B-D is characterised by the fact that the highest consumption by Slovenian off-takers is recorded there, and the costs associated with section B-D are therefore reflected in the reference price for the exit point within Slovenia.

The reference price for the exit point within Slovenia also includes all costs of the transmission system shown in the diagram as the section between points D and E, which includes the part of the transmission system used only by end users and distribution system

operators connected to exit points within Slovenia. This part of the transmission system includes, for example, pipelines of smaller diameter or lower pressure, connections (MRPs and metering stations (MPs)), reducing stations, and the like.

Part of the transmission system is the M3 pipeline between the Vodice MRP and MMRP Šempeter pri Gorici, i.e. the state border, whereby the Vodice point is designated by the letter D, and Šempeter by the letter F. The costs associated with section F-D are reflected in the reference price of the Šempeter entry point.

The data relating to each individual section of the transmission system that are required to determine reference prices are shown in the table below:

*Table 3: Data for the Individual Sections of the Transmission System*

| Section | Length [km]     | Direction of gas flow | Peak load ** [kWh/day] | Replacement value of assets [million EUR] | Eligible costs [EUR] |
|---------|-----------------|-----------------------|------------------------|-------------------------------------------|----------------------|
| A-B     | 116.30          | A->B                  | 43,191,241             | 153.45                                    | 8,464,857.85         |
| B-C     | 3.70            | B->C                  | 23,612,249             | 12.02                                     | 663,107.67           |
| B-D     | 217.20          | B->D                  | 19,578,992             | 202.09                                    | 11,147,487.56        |
| D-E     | 759.2           | D->E                  | 29,894,269             | 265.36                                    | 14,637,608.28        |
| F-D     | 100.30          | F->D                  | 10,418,798             | 177.71                                    | 9,803,006.03         |
| Total   | <b>1,196.70</b> |                       |                        | 810.63                                    | 44,716,067.39        |

\*the distance between points D and E represents the length of all pipelines intended solely for the transmission of gas to domestic exit points

\*\*as of 28 March 2023

When determining reference prices using the matrix method, costs are allocated to individual points on the basis of the load on the relevant parts of the transmission system at the time of the peak load.

For 2025, the eligible costs covered by capacity-based transmission tariffs amount to EUR 44.7 million. In line with the actual distribution of the replacement value of assets across the sections of the transmission system, the eligible costs covered by capacity-based transmission services are allocated in the same proportions. These costs represent the allowed revenue covered by capacity-based entry and exit tariffs.

## 4.2 Proposed Adjustments for Capacity-Based Transmission Tariffs

**Reference: Article 26(1)(a)(ii) of Commission Regulation (EU) 2017/460**

This consultation document does not include adjustments to tariffs at storage entry points and storage exit points of at least 50%, nor discount options at LNG facility entry points and

at points relating to infrastructure developed for the purpose of ending the isolation of Member States in terms of their gas transmission systems, nor at exit points to such infrastructure, which would be required under Article 9 of Commission Regulation (EU) 2017/460, since the Slovenian transmission system currently has no such points.

### 4.3 Indicative Reference Prices

#### Reference: Article 26(1)(a)(iii) of Commission Regulation (EU) 2017/460

In accordance with Article 12 of Commission Regulation (EU) 2017/460, the reference prices are used as reserve prices for yearly standard capacity products for firm capacity. A reference price means the price of a capacity product for firm capacity for a period of one year, applicable at entry and exit points, on the basis of which capacity-based transmission tariffs are determined. Reserve prices for non-annual standard capacity products for firm capacity will be determined in accordance with Chapter III of Commission Regulation (EU) 2017/460.

The matrix method does not determine a tariff item for a point at which there is no flow on the day of peak load. Accordingly, the model does not derive tariff items for the Rogatec entry point and the Slovenia (domestic entry point), and for the Ceršak and Šempeter exit points. The tariff items for these interconnection points are set at 100% of the tariff item in the direction of flow, while the tariff item for the Slovenia entry point (domestic entry point) is the average of the tariffs at all entry points.

The indicative reference prices for the Šempeter pri Gorici entry and exit points are non-competitive relative to the other points, and the application of such tariff items would result in a lack of interest among network users and even lower capacity bookings. The Šempeter pri Gorici point is located on the Austria-Slovenia-Italy transmission route, which competes with the direct Austria-Italy transmission route, as well as on the Italy-Slovenia-Croatia route. The high indicative reference price is the result of the high replacement value of the section of the transmission system reflected in this price, combined with the low level of capacity booked at this point.

On the basis of the data in Tables 1 and 3, the following indicative reference prices were calculated using the matrix method:

*Table 4: Indicative Reference Prices for Entry Capacity for 2025, in EUR/(kWh/day)*

| Entry point (e)                 | Indicative entry reference price for 2025 |
|---------------------------------|-------------------------------------------|
| Ceršak                          | 0.28387                                   |
| Šempeter pri Gorici             | 0.98048                                   |
| Rogatec                         | 0.01471                                   |
| Slovenia - domestic entry point | 0.42635                                   |

**Table 5: Indicative Reference Prices for Exit Capacity for 2025, in EUR/(kWh/day)**

| Exit point (e)                 | Indicative entry reference price for 2025 |
|--------------------------------|-------------------------------------------|
| Ceršak                         | 0.28387                                   |
| Šempeter pri Gorici            | 0.98048                                   |
| Rogatec                        | 0.01471                                   |
| Slovenia - domestic exit point | 0.81100                                   |

The following adjustments were therefore made when determining the reference prices, in accordance with the fourth paragraph of Article 6 of Commission Regulation (EU) 2017/460. First, in accordance with point (a) of the fourth paragraph of Article 6 of Commission Regulation (EU) 2017/460, a benchmarking analysis was carried out at the Ceršak interconnection point, which represents the main supply direction of the Slovenian transmission system. As part of the benchmarking analysis, the competitiveness of transmission routes through Slovenia was assessed, taking into account the published tariffs of neighbouring transmission system operators. The level of the confirmed 2024 tariff items at that interconnection point (EUR 0.12640/(kWh/day)) was taken as the starting point for the adjustment. On this basis, the entry tariff item for the Ceršak interconnection point was reduced, using a correction factor of 0.5974, from the indicative reference price of EUR 0.28387/(kWh/day) to a competitive level. Second, in accordance with point (b) of the fourth paragraph of Article 6 of Commission Regulation (EU) 2017/460, the entry and exit tariff items at all interconnection points (Ceršak, Šempeter pri Gorici, Rogatec) were equalised to the level determined by the benchmarking exercise for the Ceršak interconnection point. This removes the differentiation between border points, ensures non-discriminatory treatment of all transmission routes through Slovenia, and increases the competitiveness of cross-system network use. The tariff item in the direction in which there is no flow on the day of peak load is thereby set at 100% of the tariff item in the direction of flow. Third, in accordance with point (c) of the fourth paragraph of Article 6 of Commission Regulation (EU) 2017/460, all tariff items, including the tariff item for the domestic exit point, were rescaled by multiplying them by a correction factor of 0.8304, so that, given the planned capacity bookings, the allowed revenue from capacity-based transmission services of EUR 44.7 million is achieved. In determining reference prices, it was also taken into account that network users also make bookings of short-term products, which vary by point and according to their respective needs for transmission capacity at any given time. The transmission system operator indeed observes a growing interest among network users in short-term capacity, which results from the optimisation of booked capacity. In the forecast and estimate of booked transmission capacity in Table 1, short-term bookings are taken into account as an overall yearly average of the estimated booked transmission capacity, whereas in determining the reference prices themselves, revenue from the booking of short-term capacity is also taken into account within the scope of achieving the allowed revenue.

The tariff item for the Slovenia - domestic exit point is uniform for all network users, since the exit tariff item bands by customer group, which were being phased out over the period 2020-2024, were fully abolished as of 2024. Since there is no Slovenia - domestic entry point

on the transmission system, it is determined as the average of the tariff items at all other entry points. The tariff items determined provide network users with competitive access to, and use of, gas sources, while at the same time ensuring that the transmission system operator achieves its allowed revenue.

The reference prices are also equal to the confirmed tariff items for 2025, to which the Energy Agency granted its consent within the regulatory framework for the 2025-2027 period.

*Table 6: Reference Prices for Entry Capacity for 2025, in EUR/(kWh/day)*

| Entry point (e)                 | Reference price for 2025 |
|---------------------------------|--------------------------|
| Ceršak                          | 0.14082                  |
| Šempeter pri Gorici             | 0.14082                  |
| Rogatec                         | 0.14082                  |
| Slovenia - domestic entry point | 0.14082                  |

*Table 7: Reference Prices for Exit Capacity for 2025, in EUR/(kWh/day)*

| Exit point (e)                 | Reference price for 2025 |
|--------------------------------|--------------------------|
| Ceršak                         | 0.14082                  |
| Šempeter pri Gorici            | 0.14082                  |
| Rogatec                        | 0.14082                  |
| Slovenia - domestic exit point | 0.67347                  |

In accordance with the regulatory framework for the 2025-2027 period, network charge tariff items are adjusted annually in 2026 and 2027 by a factor of 1.022, reflecting the planned inflation taken into account, thereby ensuring the smoothing of tariff items between the individual years of the regulatory period and predictable movement of tariffs for network users. The tariff items for 2026 are thus determined as the 2025 tariff items multiplied by the factor 1.022, and the tariff items for 2027 as the 2026 tariff items multiplied by the factor 1.022. The reference prices for tariff year 2027, to which this consultation document relates, are shown in Tables 8 and 9.

*Table 8: Reference Prices for Entry Capacity for 2027, in EUR/(kWh/day)*

| Entry point (e)                 | Reference price for 2027 |
|---------------------------------|--------------------------|
| Ceršak                          | 0.14708                  |
| Šempeter pri Gorici             | 0.14708                  |
| Rogatec                         | 0.14708                  |
| Slovenia - domestic entry point | 0.14708                  |

**Table 9: Reference Prices for Exit Capacity for 2027, in EUR/(kWh/day)**

| Exit point (e)                 | Reference price for 2027 |
|--------------------------------|--------------------------|
| Ceršak                         | 0.14708                  |
| Šempeter pri Gorici            | 0.14708                  |
| Rogatec                        | 0.14708                  |
| Slovenia - domestic exit point | 0.70343                  |

## 4.4 Cost Allocation Assessment

### Reference: Article 26(1)(a)(iv) of Commission Regulation (EU) 2017/460

In accordance with the need to define transmission and non-transmission services under Article 4 of Commission Regulation (EU) 2017/460, the Act on the Methodology for Network Charges for the Gas Transmission System (Official Gazette of the Republic of Slovenia, Nos. 20/19, 8/20, 85/20, 48/21, 204/21 - ZOP, 137/22 - corr., 146/22, 103/23, 53/24 and 50/25) provides that revenue from transmission services, in addition to revenue from capacity-based transmission tariffs at all entry and exit points, will also include revenue from transmission services under a commodity-based transmission tariff for own consumption of gas, in accordance with Article 4(3) of the same Regulation.

The company Plinovodi has carried out a cost allocation assessment relating to revenue from transmission services covered by capacity-based transmission tariffs, and an assessment of the allocation of costs relating to revenue from transmission services covered by commodity-based transmission tariffs.

In carrying out the assessment of the allocation of costs, relating to revenue from transmission services recovered by capacity-based transmission tariffs, both the matrix method and the CWD methodology used the same input data as cost drivers, namely estimated contracted capacity and distance. The assessment was carried out for the adjusted reference prices for tariff year 2027. The value of the comparative index<sup>4</sup> for the allocation of capacity costs between intra-system and cross-system use of the transmission system is 104.18% under the matrix method and 2.12% under the CWD methodology. A detailed calculation of both indices is presented in Section 4.6 of this document.

The sixth paragraph of Article 5 of Commission Regulation (EU) 2017/460 provides that the national regulatory authority shall provide a justification if the comparative index exceeds 10%. The value of the comparative index under the matrix method is mainly the result of the structural characteristics of the Slovenian transmission system and of the adjustments made to the reference prices, for the following reasons. First, the transmission system was built primarily to supply domestic users, which is reflected in the high replacement value of the part of the transmission system intended solely for the supply of users in the Republic of Slovenia, and consequently in the higher reference price for the domestic exit point. Second, the utilisation of interconnection points for cross-system use is low, since the

<sup>4</sup> Calculated in accordance with Article 5 of Commission Regulation (EU) 2017/460.

majority of cross-system use takes place over a short section of the network, while the replacement value of the sections reflected in the prices of the interconnection points is high relative to the booked capacity. Third, the equalisation of entry and exit tariff items at all interconnection points to a competitive level (Section 4.3) further reduces revenue from cross-system use of the network, which is directly reflected in a higher value of the comparative index. This is the same effect identified by the Energy Agency in its Motivated Decision on determining the reference price methodology of February 2022, in which the benchmarking exercise for the Šempeter pri Gorici exit point raised the comparative index from 46.94% to 72.50%. The lower value of the comparative index under the CWD methodology is the result of the predetermined 50/50 ratio between revenue at entry and exit points, which redistributes revenue such that the ratios between revenue and cost drivers for intra-system and cross-system use are brought numerically closer together, without this reflecting the actual costs associated with the transmission of gas through the Slovenian transmission system. Despite the value of the comparative index, the transmission system operator considers the matrix method to be appropriate, since reference prices are determined in a way that reflects the actual costs of the individual parts of the transmission system. The Energy Agency will provide its final assessment regarding the allocation of costs in its Motivated Decision under the fourth paragraph of Article 27 of Commission Regulation (EU) 2017/460. The assessment of the allocation of costs relating to revenue from transmission services covered by commodity-based transmission tariffs is presented in Section 4.6 of this document.

## 4.5 Assessment of the Matrix Method

**Reference: Article 26(1)(a)(v) of Commission Regulation (EU) 2017/460**

### 4.5.1 Replicability of the Reference Price Calculation and Forecasting

On the basis of the available data and the simplified model published on the website, network users can calculate indicative average reference prices for cross-system and intra-system use of transmission capacity. All input data for the calculation are publicly available: the allowed revenue is derived from the regulatory framework to which the Energy Agency has granted its consent, while data on capacity, distances and replacement values are shown in this document. Revenue from transmission services is determined by the regulatory framework, taking into account the Act on the Methodology for Determining the Regulatory Framework. Revenue from capacity-based transmission services for 2027 amounts to EUR 46.95 million. The Energy Agency may decide that, in a given regulatory period, part of the forecast revenue from capacity-based transmission services is lower than the allowed revenue, with the aim of preventing abrupt changes in tariff items. Reference prices for the individual years of the regulatory period move predictably, since tariff items are adjusted annually within the regulatory period by a factor of 1.022 (Section 4.3), which enables network users to forecast reference prices.

### 4.5.2 Consideration of Actual Costs and the Level of Network Complexity

Due to its small size, the Slovenian gas transmission system is complex and sensitive to changes in gas flows. Certain relatively large parts of the system serve solely for use by users in the Republic of Slovenia. The transmission system has a large number of directly connected off-takers (129). On 1 January 2026, there were 296 active metering points. A large number of off-take points also means that a significant share of the transmission system operator's assets are engaged in supplying domestic users.

Additional complexity arises from the transmission - pressure conditions in the system, which require substantial adjustment of the system depending on the direction of gas inflow from neighbouring systems. In most European systems, changes in flows due to commercial conditions result in changes to flows in only a smaller part of the network, whereas in the case of the Republic of Slovenia, changes in flows can be reflected in changes to flows across a substantial part of the system. The capacities of the system, including appropriately sized compressor stations, must be adapted accordingly.

While intra-system and cross-system use of the network are intertwined, the system is not so interconnected and looped that the entire system could be assumed to constitute a homogeneous network through which gas flows via various routes. In addition to the shared use of the system for intra-system and cross-system purposes, it is also necessary to take due account of the specific transport routes where gas flows for the needs of cross-system use.

These findings indicate that, in the case of the Republic of Slovenia, the matrix method is a more appropriate reference price methodology than the CWD methodology, since it takes into account the geographical distribution of flows, which more accurately describes the conditions within the system. The maximum load of each individual geographical area is also taken into account in this respect.

### 4.5.3 Ensuring Non-Discrimination

The proposed matrix method takes into account individual geographical areas and thus appropriately addresses those areas intended primarily for domestic supply, areas intended for both cross-system and intra-system use, and areas intended primarily for cross-system use.

For the reference prices in question, the matrix method shows a ratio of cross-system to intra-system revenue of 1.3/98.7<sup>5</sup>, which we consider appropriate for the conditions of the Slovenian system. Most cross-system services take place over a relatively short part of the network, less than 60 km in length, meaning that certain parts of the system are not engaged at all in the case of cross-system use. The matrix method automatically takes this into account, and the share of revenue from cross-system use is therefore relatively small. When calculating the assessment of the allocation of costs relating to revenue from transmission services covered by capacity-based transmission tariffs, the ratio calculated under the matrix method, for the adjusted reference prices for 2027, between revenue from capacity-

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<sup>5</sup> Calculated in accordance with Article 5 of Commission Regulation (EU) 2017/460.

based transmission tariffs at all entry points and revenue from capacity-based transmission tariffs at all exit points is 16/84. This allocation is calculated in accordance with the input data used, namely as the sum of the products of the planned booked transmission capacity and the tariff items, calculated separately for entry and exit points.

The CWD methodology has no such allocation. Revenue is allocated ex ante according to the ratio of entry/exit tariff items for network use. Due to the specific pattern of use of the Slovenian system, a 50/50 assumption would be inappropriate for the Slovenian system.

The resulting ratio between entry and exit revenue reflects the history of the planning and construction of the system, which was primarily intended for large domestic industrial users (i.e. intra-system use), and to a lesser extent for cross-system use of the transmission system. The system was therefore geographically optimised to supply as many large industrial users in the Republic of Slovenia as possible.

The matrix method is also non-discriminatory as between domestic users, since it takes into account geographically defined areas and their distance from the entry points of the system, as well as the areas through which gas must flow in order to reach the end user.

The comparative index for the allocation of capacity costs under Article 5 of Commission Regulation (EU) 2017/460 is lower under the CWD methodology than under the matrix method. However, this is the result of the predetermined ex ante allocation of revenue between entry and exit points in a 50/50 ratio, which numerically equalises the ratios between revenue and cost drivers for intra-system and cross-system use, without thereby reflecting the actual costs of the individual parts of the transmission system. The matrix method calculates the ratio between entry and exit revenue, and the allocation of revenue between intra-system and cross-system use, from the actual structure of system use. The value of the comparative index therefore reflects the actual characteristics of the Slovenian transmission system and the adjustments made to ensure the competitiveness of transmission routes, rather than cross-subsidisation arising from the method itself.

#### 4.5.4 Risks Arising from Cross-System Use

The Energy Agency and the transmission system operator strive for stable and predictable tariff-setting, which at the same time reflects actual market conditions and the main characteristics of the Slovenian gas transmission system. The chosen matrix method enables tariffs to be determined in a way that reflects the actual costs of each individual part of the transmission system.

Use of the transmission system for cross-system flows is low, as confirmed by the share of cross-system use relative to intra-system use, which stands at 1.3/98.7.

The Act on the Methodology for Determining the Regulatory Framework provides that any fluctuations in system use are spread over a longer period, which gives domestic users additional protection against the risks arising from the volume of cross-system use.

### 4.5.5 Reference Prices Do Not Distort Cross-Border Trade

The matrix method ensures an appropriate allocation of costs among the interconnection entry and exit points, so that no individual point is disproportionately burdened with costs, while at the same time the reference prices ensure the competitive operation of the regional gas market. By equalising the entry and exit tariff items at all interconnection points, all transmission routes through Slovenia are treated equally, which further prevents the distortion of cross-border trade. As can be seen from Table 11, the use of the CWD methodology would result in higher reference prices at the interconnection points, which would represent an additional obstacle to cross-border trade. Owing to the ex ante allocation of revenue at all entry and exit points in a 50/50 ratio, the use of the CWD methodology would also fail to reflect the actual cost of each individual part of the transmission system. Due to the specific distribution of use of the Slovenian gas system, a 50/50 assumption would be inappropriate for the Slovenian system.

## 4.6 Comparison of the Matrix Method with the CWD Methodology

**Reference: Article 26(1)(a)(vi) of Commission Regulation (EU) 2017/460**

In the event when the transmission system operator chooses a reference price methodology other than the CWD methodology, the consultation document must contain a comparison of the proposed methodology with the CWD methodology, together with information on indicative reference prices. Table 10 below therefore provides a comparison of the methodologies.

*Table 10: Comparison of Methodologies*

|          | Component compared                                                                                                                           | Matrix method for calculating reference prices | CWD methodology |
|----------|----------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------|-----------------|
| <b>A</b> | <b>Input variables*</b>                                                                                                                      |                                                |                 |
| 1        | Allocation of allowed revenue to individual points.                                                                                          | YES                                            | YES             |
| 2        | Capacity booking assessment.                                                                                                                 | YES                                            | YES             |
| 3        | Distances between individual points of the transmission system.                                                                              | YES                                            | YES             |
| 4        | Ratio between entry and exit.**                                                                                                              | 16/84                                          | 50/50           |
|          | Component compared                                                                                                                           | Matrix method for calculating reference prices | CWD methodology |
| <b>B</b> | <b>Compliance with Article 7 of Commission Regulation (EU) 2017/460*</b>                                                                     |                                                |                 |
| 1        | The methodology enables network users to replicate the calculation of reference prices and to forecast them. ***                             | YES                                            | YES             |
| 2        | The methodology reflects the actual costs of transmission services, taking into account the level of complexity of the transmission network. | YES                                            | NO              |



|                                                                                                                                                                           |                                                                                                                                                                                                          |                |                |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------|----------------|
| 3                                                                                                                                                                         | The methodology ensures non-discrimination and prevents unjustified cross-subsidisation, also taking into account the cost allocation assessment under Article 5 of Commission Regulation (EU) 2017/460. | YES            | YES            |
| 4                                                                                                                                                                         | The methodology ensures that the significant volume risk associated in particular with flows across the entry-exit point system will not be borne by end customers within that entry-exit point system.  | YES            | YES            |
| 5                                                                                                                                                                         | The methodology ensures that the calculated reference prices will not distort cross-border trade.                                                                                                        | YES            | NO             |
| <b>C</b><br><b>Cost allocation assessment of capacity-based costs (Article 5(1)(a) of Commission Regulation (EU) 2017/460) for the adjusted reference prices for 2027</b> |                                                                                                                                                                                                          |                |                |
| 1                                                                                                                                                                         | Revenue assessment within the system.                                                                                                                                                                    | 46,341,179     | 45,105,198     |
| 2                                                                                                                                                                         | Revenue assessment outside the system.                                                                                                                                                                   | 610,347        | 1,846,329      |
| 3                                                                                                                                                                         | Cost factor assessment within the system.                                                                                                                                                                | 14,806,488,600 | 14,806,488,600 |
| 4                                                                                                                                                                         | Cost factor assessment outside the system.                                                                                                                                                               | 619,070,258    | 619,070,258    |
| 5                                                                                                                                                                         | Ratio within the system.                                                                                                                                                                                 | 0.00313        | 0.00305        |
| 6                                                                                                                                                                         | Ratio outside the system.                                                                                                                                                                                | 0.00099        | 0.00298        |
| 7                                                                                                                                                                         | Comparative index.                                                                                                                                                                                       | 104.18%        | 2.12%          |
| <b>D</b><br><b>Cost allocation assessment on the basis of commodity (Article 5(1)(a) of Commission Regulation (EU) 2017/460)</b>                                          |                                                                                                                                                                                                          |                |                |
| 1                                                                                                                                                                         | Revenue assessment within the system.                                                                                                                                                                    | 1,271,663      | 1,271,663      |
| 2                                                                                                                                                                         | Revenue assessment outside the system.                                                                                                                                                                   | 35,268         | 35,268         |
| 3                                                                                                                                                                         | Cost factor assessment within the system.                                                                                                                                                                | 26,767,123     | 26,767,123     |
| 4                                                                                                                                                                         | Cost factor assessment outside the system.                                                                                                                                                               | 742,358        | 742,358        |
| 5                                                                                                                                                                         | Ratio within the system.                                                                                                                                                                                 | 0.04751        | 0.04751        |
| 6                                                                                                                                                                         | Ratio outside the system.                                                                                                                                                                                | 0.04751        | 0.04751        |
| 7                                                                                                                                                                         | Comparative index.                                                                                                                                                                                       | 0.00%          | 0.00%          |

\*Sections A and B refer to the cost allocation assessment on the basis of capacity (Article 5(1)(a) of Commission Regulation (EU) 2017/460) for the adjusted reference prices for 2027

\*\* the 16/84 ratio between revenue from capacity-based transmission tariffs at all entry and exit points is based on the specific nature of actual use of the transmission system, where the majority share represents the supply of gas to end users in the Republic of Slovenia

\*\*\* using the simplified model, network users can calculate indicative average reference prices for cross-system and intra-system use of capacity

The company Plinovodi has carried out cost allocation assessment relating to revenue from transmission services covered by capacity-based transmission tariffs, in accordance with Article 5(1)(a) of Commission Regulation (EU) 2017/460, using both the matrix method and the CWD methodology. The transmission system operator notes that both assessments were carried out using the same input data and for the same revenue from capacity-based transmission services, thereby ensuring a transparent and impartial comparison of the two reference price calculation methods. The lower value of the index under the CWD methodology is the result of the predetermined ex ante allocation of revenue between entry and exit points in a 50/50 ratio, which numerically equalises the ratios between revenue and cost drivers, without reflecting the actual costs of the individual parts of the transmission system. In determining reference prices, the proposed matrix method takes into account a complex system of input parameters, thereby ensuring a more appropriate allocation of system usage costs across the entire transmission system, such that the tariff items more closely reflect the actual costs of transmission services within and outside the system.

When calculating the cost allocation assessment, both under the matrix method and under the CWD methodology, we took into account the forecast and estimate of booked transmission capacity for domestic users and cross-border transport for 2027, as well as the distance between the individual entry and exit points of the transmission system. In the calculation based on the CWD methodology, we applied a 50/50 ratio between revenue from capacity-based transmission tariffs at all entry and exit points. In the case of the calculation under the matrix method, the calculated ratio for the adjusted reference prices for 2027 is 16/84.

*Table 11: Comparison of Tariff Items, in EUR/(kWh/day)*

| Entry/Exit point (e)            | Matrix method<br>Tariff items 2027 | CWD methodology<br>Tariff items 2027 |
|---------------------------------|------------------------------------|--------------------------------------|
| Entry point Ceršak              | 0.14708                            | 0.52812                              |
| Entry point Šempeter pri Gorici | 0.14708                            | 0.33740                              |
| Entry point Rogatec             | 0.14708                            | 0.36560                              |
| Slovenia - domestic entry point | 0.14708                            | 0.01663                              |
| Exit point Ceršak               | 0.14708                            | 0.52701                              |
| Exit point Šempeter pri Gorici  | 0.14708                            | 0.73528                              |
| Exit point Rogatec              | 0.14708                            | 0.30923                              |
| Slovenia - domestic exit point  | 0.70343                            | 0.40686                              |

The tariff items under the matrix method in Table 11 are equal to the reference prices in Tables 8 and 9 and represent the confirmed tariff items for 2027. The tariff items under the CWD methodology are determined using the same input data (the estimated booked transmission capacity for 2027 and the distances between points) with an ex ante ratio of 50/50, and are calibrated so that, given the planned capacity bookings, the same revenue from capacity-based transmission services of EUR 46.95 million is achieved, thereby ensuring direct comparability of the tariff items under both methods.

The comparison of the indicative tariff items shows that the tariff items for the interconnection points, calculated in accordance with the proposed matrix method, are lower and more competitive at all interconnection points, and promote cross-border trade. The difference in the tariff item for the exit points within Slovenia reflects the purpose for

which the Slovenian transmission system was built, namely primarily for domestic users of the transmission system, which is also evident from the forecast of booked transmission capacity.

The transmission system operator will recover part of its revenue through commodity-based tariffs, as provided for in Article 4(3)(a) of Commission Regulation (EU) 2017/460. It has therefore also carried out an assessment of the allocation of costs relating to revenue from transmission services covered by commodity-based transmission tariffs, based solely on cost drivers.

When calculating the cost allocation assessment relating to revenue from transmission services covered by commodity-based transmission tariffs, we took into account the daily gas flow volume for both the matrix method and the CWD methodology. Since the commodity-based transmission tariff is charged uniformly per unit of gas transported at all exit points, the ratio between revenue and the cost driver for intra-system and cross-system use of the network is identical. The comparative index is therefore the same for both the matrix method and the CWD methodology, and amounts to 0.00%.

## 5. Indicative Information under Article 30(1)(b) of Commission Regulation (EU) 2017/460

### Reference: Article 26(1)(b) of Commission Regulation (EU) 2017/460

In accordance with Article 3 of Commission Regulation (EU) 2017/460, 'allowed revenue' means the sum of revenue from transmission services and revenue from non-transmission services for the performance of the transmission system operator's services, for a given period within a given regulatory period, to which such a transmission system operator is entitled under a non-price cap regime and which is determined in accordance with Article 41(6)(a) of Directive 2009/73/EC. All information in this section relates to tariff year 2027 and is taken from the regulatory framework for the regulatory period from 1 January 2025 to 31 December 2027, to which the Energy Agency has granted its consent. The method for determining the allowed revenue is explained in Section 4.1.2 of this document.

### Reference: Article 30(1)(b)(i) of Commission Regulation (EU) 2017/460

*Table 12: Allowed Revenues*

|                  |                         |
|------------------|-------------------------|
| Allowed revenues | EUR 48.7 million (2027) |
|------------------|-------------------------|

### Reference: Article 30(1)(b)(iv) of Commission Regulation (EU) 2017/460

*Table 13: Revenue from Transmission Services*

|                                    |                         |
|------------------------------------|-------------------------|
| Revenue from transmission services | EUR 48.3 million (2027) |
|------------------------------------|-------------------------|



In accordance with Article 3 of Commission Regulation (EU) 2017/460, 'revenue from transmission services' means the portion of allowed revenue covered by transmission tariffs.

**Reference: Article 30(1)(b)(v)(1) of Commission Regulation (EU) 2017/460**

*Table 14: Ratio between Revenue from Capacity-based and Commodity-based Transmission tariffs*

|                                                   |        |
|---------------------------------------------------|--------|
| Revenue from capacity-based transmission tariffs  | 97.29% |
| Revenue from commodity-based transmission tariffs | 2.71%  |

**Reference: Article 30(1)(b)(v)(2) of Commission Regulation (EU) 2017/460**

*Table 15: Ratio between Revenue from Transmission Tariffs at Entry and Exit Points*

|                                                                      |     |
|----------------------------------------------------------------------|-----|
| Revenue from capacity-based transmission tariffs at all entry points | 16% |
| Revenue from capacity-based transmission tariffs at all exit points  | 84% |

Ratio calculated under the matrix method for the adjusted reference prices for 2027.

**Reference: Article 30(1)(b)(v)(3) of Commission Regulation (EU) 2017/460**

*Table 16: Allocation of Revenue between Intra-system and Cross-system Use, Calculated in Accordance with Article 5 of Commission Regulation (EU) 2017/460*

|                                                                |        |
|----------------------------------------------------------------|--------|
| Revenue from intra-system network use at entry and exit points | 98.70% |
| Revenue from cross-system network use at entry and exit points | 1.30%  |

## 6. Information on Commodity-Based Transmission Tariffs and Non-Transmission Tariffs

**Reference: Article 26(1)(c) of Commission Regulation (EU) 2017/460**

### 6.1 Method of Determining Commodity-Based Transmission Tariffs

**Reference: Article 26(1)(c)(i)(1) of Commission Regulation (EU) 2017/460**

Gas for own consumption is used for conditioning gas at metering and regulating stations, including the heating of these facilities, and for powering compressors at the Kidričevo and Ajdovščina compressor stations, which is one of the conditions for reliable gas transmission. The gas consumed in this way represents a cost over which the transmission system operator has no control. The volume of gas consumed depends mainly on the activities of transmission system users and on the flow-pressure conditions at the borders of the Slovenian transmission system. An additional variable in determining the level of the realised cost of gas for own consumption is market conditions on the gas markets, since the transmission system operator purchases gas for own consumption from the most favourable supplier, selected through a transparent and impartial procedure.

The same methodology for determining the amount for own consumption is envisaged as is currently in force, enabling the long-term sustainable operation of the transmission system operator and ensuring coverage of the realised cost of gas for own consumption, while also being linked to the technical specifications of the compressor stations and the transmission system.

The data on gas flow volume are prepared on the basis of the planned quantities of gas to be transported in 2027 under the regulatory framework for the 2025-2027 period and the transmission system operator's estimates.

*Table 17: Gas Flow Volume, in Million kWh/day*

| Exit point | Gas flow volume 2027 |
|------------|----------------------|
| Ceršak     | 0.011                |
| Rogatec    | 0.663                |
| Sempeter   | 0.069                |
| Slovenia   | 26.767               |

### 6.1.1 Share of Forecasted Revenue to Be Covered by Commodity-Based Transmission Tariffs

**Reference: Article 26(1)(c)(i)(2) of Commission Regulation (EU) 2017/460**

Revenue from own consumption of gas represents a smaller share of the transmission system operator's revenue from transmission services. This share amounts to around 2.71% for 2027. The transmission system operator charges network users for gas used for own consumption at the exit points of the transmission system, in the manner described in Annex 3.

### 6.1.2 Indicative Commodity-Based Transmission Tariffs

**Reference: Article 26(1)(c)(i)(3) of Commission Regulation (EU) 2017/460**

The tariff item for the transmission system operator's own consumption for 2027 amounts to EUR 0.03254/kWh and remains unchanged from previous years. For the purpose of carrying out the cost allocation assessment relating to revenue from transmission services that would be covered by commodity-based transmission tariffs, a tariff item of EUR 0/kWh was applied at entry points.

## 6.2 Non-Transmission Services for Network Users

**Reference: Article 26(1)(c)(ii) of Commission Regulation (EU) 2017/460**

### 6.2.1 Tariff Methodology for Non-Transmission Services

**Reference: Article 26(1)(c)(ii)(1) of Commission Regulation (EU) 2017/460**

The basic non-transmission service charged to transmission system users upon booking exit capacity is the measurement service. In accordance with the Act on the Methodology for Network Charges for the Gas Transmission System, the network charge for measurement is charged in the form of a measurement tariff item ( $C_M$ ) and takes into account the nominal flow rate of the metering device and the number of pressure reductions.

The measurement tariff item is set so that the network charge for measurement covers the portion of eligible costs arising in connection with the scope of measurement activities, relating to the performance of measurements, the processing of measured data, maintenance, calibration, and the periodic replacement of metering devices as required by law.

The transmission system operator may also charge transmission system users for other services within the scope of performing its public service activity, which constitute non-transmission services. Tariff items for other services are determined in a manner that takes into account the actual costs of those services. In the process of determining the regulatory framework, the transmission system operator determines the individual tariff items for other services, to which the Agency grants its consent, which are not included in the allowed revenue but in the transmission system operator's other revenue. Other services and the corresponding applicable tariff items are shown in Annex 6 (Tariff Items for Other Services).

### 6.2.2 Share of Revenue Expected to Be Covered by Tariffs for Non-Transmission Services

**Reference: Article 26(1)(c)(ii)(2) of Commission Regulation (EU) 2017/460:**

Revenue from measurement services represents a smaller share of the transmission system operator's revenue and reflects the actual costs of carrying out gas transmission measurement. This share amounts to around 0.90% for 2027.

### 6.2.3 The Manner in Which the Associated Revenue from Non-Transmission Services Is Adjusted, as Referred to in Article 17(3) of Commission Regulation (EU) 2017/460

**Reference: Article 26(1)(c)(ii)(3) of Commission Regulation (EU) 2017/460:**

Revenue from measurement services reflects the actual costs realised for these services. The transmission system operator reports the amount and type of these costs to the Energy Agency on an annual basis and takes them into account when determining the measurement tariff item for the next regulatory period.

### 6.2.4 Indicative Non-Transmission Tariffs for Non-Transmission Services Provided to Network Users

**Reference: Article 26(1)(c)(ii)(4) of Commission Regulation (EU) 2017/460:**

The tariff item for the provision of measurement services for 2027 amounts to EUR 22.86903/month.

The transmission system operator charges network users for measurement services in the manner set out in Annex 4.

## 7. Indicative Information under Article 30(2) of Commission Regulation (EU) 2017/460

**Reference: Article 26(1)(d) of Commission Regulation (EU) 2017/460**

### 7.1 Differences in the Tariff Rate for 2027 Compared to 2026

*Table 18: Estimated Differences in Tariff Rate for 2027 Compared to 2026, in EUR/(kWh/day)*

| Entry and exit points           | Tariff items 2027 | Estimated difference 2027/2026 |
|---------------------------------|-------------------|--------------------------------|
| Entry point Ceršak              | 0.14708           | + 0.00317                      |
| Entry point Šempeter pri Gorici | 0.14708           | + 0.00317                      |
| Entry point Rogatec             | 0.14708           | + 0.00317                      |
| Slovenia - domestic entry point | 0.14708           | + 0.00317                      |
| Exit point Ceršak               | 0.14708           | + 0.00317                      |
| Exit point Šempeter pri Gorici  | 0.14708           | + 0.00317                      |
| Exit point Rogatec              | 0.14708           | + 0.00317                      |
| Slovenia - domestic exit point  | 0.70343           | + 0.01514                      |

The 2027 tariff items are equal to the reference prices for 2027 in Tables 8 and 9. The difference in the level of tariffs reflects the annual adjustment of tariff items by the factor 1.022 within the 2025-2027 regulatory period, which ensures the smoothing of tariff items between the individual years of the regulatory period and predictable movement of tariffs for network users.

### 7.2 Estimated Differences in the Tariff Rate until the End of the Regulatory Period

Tariff year 2027, to which this consultation document relates, is the last year of the 2025-2027 regulatory period. There are therefore no differences in the tariff rate for further years within this regulatory period. Network charge tariff items for the years after 2027 will be determined in the process of preparing the regulatory framework for the next regulatory



period, to which the Energy Agency will grant its consent, and will be the subject of the next consultation in accordance with Article 26 of Commission Regulation (EU) 2017/460.

### 7.3 Simplified Tariff Model

In accordance with Article 30 of Commission Regulation (EU) 2017/460, the simplified tariff model, together with enclosed explanations on how to use it, is published at the following link: [https://www.plinovodi.si/media/xyvks5fb/information\\_562026.pdf](https://www.plinovodi.si/media/xyvks5fb/information_562026.pdf).



## 8. Annexes

Annex 1: Comments and Suggestions Form

Annex 2: Description of the Network Charge for the use of Transmission System

Annex 3: Method for Calculating Own Consumption Charges

Annex 4: Method for Calculating Measurement Service Charges

Annex 5: Table of Terms Used

Annex 6: Tariff Items for Other Services