

TRANSPARENCY ON TRANSMISSION TARIFFS GAS YEAR 2025-2026

Information to be published pursuant to article 29 of Commission Regulation (EU) 2017/460

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Introduction

Commission Regulation (EU) 2017/460 of 16 March 2017 establishes a network code on harmonised transmission tariff structures for gas ("Tariff NC"), including rules on the application of a reference price methodology, on the calculation of reserve prices for standardized capacity products and on the publication requirements, among others. The publication requirements are defined in articles 29 and 30 of the Tariff NC.

Article 29 refers to the information to publish before the annual yearly capacity auction, and refers to standard capacity products for firm capacity and for interruptible capacity, covering information on the reserve prices, multipliers, seasonal factors and evaluation of the probability of interruption. This information must be published no later than 30 days before the annual yearly capacity auction, which will occur on July, 7th.

Article 30 refers to the information to publish before the tariff period, and refers to the information associated with the approval of transmission tariffs for natural gas, covering information on the determination of allowed revenues and tariffs. This information must be published no later than 30 days before the tariff period.

This document ¹ presents the information required under article 29 of the Tariff NC. The information required under article 30 will be published in a separate document no later than 30 days before the tariff period, which starts on October 1st.

Legal notice

The information provided in this document aims to comply with the provisions of article 29 of Commission Regulation (EU) 2017/460 of 16 March 2017, establishing a network code on harmonised transmission tariff structures for gas, not dispensing with the consultation of the ERSE Directive 5/2025, of 2 June 2025 ², which approves the tariffs and prices for natural gas for the gas year 2024-2025. In case of discrepancy, the information published by the ERSE Directive 8/2024 prevails over the information disclosed in this document.

² Subject to subsequent publication in the Official Journal (*Diário da República*).

¹ Available at ERSE's webpage.

Art. 29 (a) Information for standard capacity products for firm capacity

The gas transmission network in Portugal has a Virtual Interconnection Point (VIP) at the border with the Spanish transmission network, denominated as VIP Iberico. VIP Iberico combines two interconnection points existing on the Portugal-Spain border, namely the Campo Maior-Badajoz point and the Valença do Minho-Tuy point.

VIP Iberico is the only point on the transmission network subject to Commission Regulation (EU) 2017/460, of 16 March, establishing a network code on capacity allocation mechanisms in gas transmission systems.

Currently, all existing capacity products on each side of the border between Portugal and Spain are offered, namely the standard capacity product types (5-years, yearly, quarterly, monthly, daily and within-day). ERSE sets the reserve prices for standard firm capacity products at VIP Iberico for a tariff period of one year coinciding with the timeframe of the yearly standard capacity products.

Art. 29(a)(i) Reserve prices

The following two tables present the reserve prices for the standard capacity products for firm capacity at VIP Iberico during gas year 2025-2026 (October - September), namely at the entry point from VIP Iberico (Table 1) and at the exit point to VIP Iberico (Table 2).

Table 1 - Reserve prices of the standard capacity products for firm capacity at the entry point from VIP

Iberico, gas year 2025-2026

PRICES OF THE TRANSMISSION TARIFF: EN Firm capacity produts (daily horizon or high	
VIP Iberico	Contracted capacity
	EUR/(kWh/day)/day
Annual	0,00010237
Quarterly	0,00012080
Monthly	0,00013820
Daily	0,00019860
PRICES OF THE TRANSMISSION TARIFF: EN Firm capacity produts (within-day horizon)	TRY POINTS
VIP Iberico	Contracted capacity
	EUR/(kWh/h)/h
Within-day	0,00021806

Table 2 - Reserve prices of the standard capacity products for firm capacity at the exit point to VIP

Iberico, gas year 2025-2026

/IP Iberico	Contracted capacity
	EUR/(kWh/day)/day
Annual	0,0001009
Quarterly	0,0001191
Monthly	0,0001362
Daily	0,0001958
RICES OF THE TRANSMISSION TARIFF: EX	
irm capacity produts (within-day nonzon	1
, ,,	Contracted capacity
irm capacity produts (within-day horizon	,

From 5 August 2025, the tariff discount provided for in Article 18(4) of Regulation (EU) 2024/1789 of 13 June ³ shall apply. Under paragraph 4 of that article, network users shall obtain from the transmission system operator a discount on the capacity-based tariff at interconnection points between Member States of 100% for renewable gas and 75% for low-carbon gas, upon presentation of proof of sustainability ⁴. The discount only applies to the shortest possible route in terms of border crossings ⁵. Thus, the following two tables show the reserve prices for standard firm capacity products in the Iberian VIP, considering the 75% tariff discounts applicable to low-carbon gases, applicable during gas year 2025-2026 (October to September) at the entry point from the Iberian VIP (Erro! A origem da referência não foi encontrada.)

³ 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).

⁴ The proof shall be based on a valid sustainability certificate obtained, for renewable gas, in accordance with Articles 29 and 30 of Directive (EU) 2018/2001 and registered in the Union database referred to in Article 31(a) of that Directive, and, for low-carbon gas, based on a valid sustainability certificate obtained in accordance with Article 9 of Directive (EU) 2024/1788.

⁵ Pursuant to Article 18(4)(a), the itinerary is assessed between the place where the specific declaration relating to proof of sustainability, based on a valid sustainability certificate, was first registered in the Union database and the place where it was cancelled, considering it to have been consumed, provided that the discount does not cover any auction premium.

Table 3 - Reserve prices of the standard capacity products for firm capacity at the entry point from VIP lberico, gas year 2025-2026, including a 75% discount

PRICES OF THE TRANSMISSION TARIFF: ENTRY POINTS Firm capacity produts (daily horizon or higher) 75% tariff discount	
VIP Iberico (low-carbon gas)	Contracted capacity EUR/(kWh/day)/day
Annual Quarterly Monthly Daily	0,00002559 0,00003020 0,00003455 0,00004965
PRICES OF THE TRANSMISSION TARIFF: ENTRY POINTS Firm capacity produts (within-day horizon) 75% tariff discount	
VIP Iberico (low-carbon gas)	Contracted capacity EUR/(kWh/h)/h
Within-day	0,00005452

Table 4 - Reserve prices of the standard capacity products for firm capacity at the exit point to VIP lberico, gas year 2025-2026, including a 75% discount

PRICES OF THE TRANSMISSION TARIFF: EXIT POINTS Firm capacity produts (daily horizon or higher) 75% tariff discount	
VIP Iberico (low-carbon gas)	Contracted capacity EUR/(kWh/day)/day
Annual Quarterly Monthly Daily	0,00002523 0,00002978 0,00003407 0,00004895
PRICES OF THE TRANSMISSION TARIFF: EXIT POINTS Firm capacity produts (within-day horizon) 75% tariff discount	
VIP Iberico (low-carbon gas)	Contracted capacity EUR/(kWh/h)/h
Within-day	0,00005375

Standard firm capacity products longer than one year have reserve prices equal to the yearly product applicable at the time of capacity utilization.

Art. 29(a)(ii) Multipliers and seasonal factors

The multipliers applicable to non-yearly capacity products at VIP Iberico are provided in Table 5. The multipliers for gas year 2025-2026 are equal to the ones established in the previous gas year.

Table 5 - Multipliers applied to reserve prices for non-yearly standard capacity products, gas year 2025-2026

MULTIPLIERS OF THE TRANSMISSION TARIFF Entry points and exit points	
VIP Iberico	
Quarterly product	1,18
Monthly product	1,35
Daily product	1,94
Within-day product	2,13

Standard firm capacity products longer than one year have reserve prices equal to the yearly product, corresponding to unitary multipliers.

Seasonal factors are not applied.

Art. 29(a)(iii) Justification for the level of multipliers

In line with the position expressed by stakeholders in the sector on previous occasions, ERSE has privileged the stability of multipliers ⁶. Multipliers for quarterly, monthly and daily products were constant between gas year 2013-2014 and gas year 2023-2024. The multiplier for within-day products was constant between gas year 2016-2017 and gas year 2023-2024. Following a public consultation completed in 2024 7 , the methodology for calculating multipliers was updated, to take effect from the 2024-2025 gas year. The methodological change resulted in multiplier values similar to the previous ones, although slightly lower, for all maturities.

Article 28(3)(a) of the Tariff NC refers to five criteria to take into account in the approval of multipliers by the national regulatory authority⁸. ERSE considers that the current level of multipliers meets the five criteria for multipliers.

The first criterion, of a balance between short-term gas trade and long-term signals for efficient investment, is considered to be met insofar as the multipliers in force have not prevented market agents from reserving

⁶ For instance in the response to the <u>Public Consultation n.º 66</u> of ERSE.

⁷ Public consultation n.º 117 of ERSE.

⁸ The criteria are: (i) the balance between facilitating short-term gas trade and providing long-term signals for efficient investment in the transmission system; (ii) the impact on the transmission services revenue and its recovery; (iii) the need to avoid crosssubsidisation between network users and to enhance cost-reflectivity of reserve prices; (iv) situations of physical and contractual congestion; (v) the impact on cross-border flows.

capacity in the VIP Iberico at the various horizons of the capacity products according to their commercial supply strategy: in the VIP Iberico there has been a transfer from booking annual capacity to capacity in shorter maturity products since gas year 2020-2021, together with a total booking of the LNG terminal's technical regasification capacity through the annual product, since gas year 2019-2020. Given the stability of the multipliers, this change in the supply strategy of market agents is essentially the result of the price relationship between LNG and natural gas and the long-term contracts held by agents operating in the Iberian Peninsula and, in particular, in Portugal. The multipliers for non-yearly standard capacity products should represent a balance between two opposite objectives. On the one hand, multipliers should be high enough such that long-term bookings are not discouraged as investments in transmission assets have a long-term perspective. On the other hand, multipliers should be low enough to avoid the creation of barriers for short-term bookings, which would hamper flexibility and the entry of new players into the market. Moreover, multipliers should increase as the duration of the product type decreases, encouraging capacity bookings that give greater predictability to the management of the system.

The second criterion, the impact on revenue recovery, is ensured through the stability of the multipliers, which has allowed ERSE to estimate the use of VIP Iberico in the various time horizons with greater certainty, mitigating the risk of revenue deviations due to changes in multipliers ⁹.

In view of the third criterion, cross-subsidization between network users is avoided as the same multipliers are applied for the two supply entry points of the Portuguese system, represented by VIP Iberico and the LNG terminal in Sines. Since the same multipliers are applied for capacity products with the same duration across these two entry points, in the event of greater short-term volatility it is not expected that multipliers will be a determinant factor for gas supply to consider one specific entry point over the other.

In the fourth criterion, on situations of physical and contractual congestion, this situation is not applicable to Portugal since physical congestion has never been recorded at VIP Iberico, nor the application of auction premia in the respective capacity auctions.

Finally, in the criterion related to cross-border flows, multipliers are considered to be neutral for cross-border flows, since the same multipliers are applied in both directions of VIP Iberico and on the two supply entry points of the Portuguese system.

⁹ The main reason for the volatility of revenues recovered at points of the transmission network is related to the demand by gasfired power plants, which depends on the dynamics of the wholesale electricity market, as well as weather conditions. The level of multipliers applied at VIP Iberico does not contribute to this volatility.

Art. 29(a)(iv) Justification for the application of the seasonal factors

Seasonal factors are not applied at VIP Iberico.

Art. 29(b) Information for standard capacity products for interruptible capacity

The transmission system operator in Portugal provides at VIP Iberico, at the border with the Spanish transmission network, standard capacity products for interruptible capacity for daily and within-day bookings.

These products comply with the rules in the network code on capacity allocation mechanisms in gas transmission systems established by Commission Regulation (EU) 2017/459.

Art. 29(b)(i) Reserve prices

In accordance with the Tariff Regulation for the gas sector ¹⁰, reserve prices of products for interruptible capacity relating to the points of entry and exit of the transmission network include an ex-ante discount or an ex-post discount, to be decided annually by ERSE.

In the gas year 2025-2026, an ex-ante discount applies to the standard capacity products for interruptible capacity at VIP Iberico.

The following two tables present the reserve prices for the standard capacity products for interruptible capacity at VIP Iberico during gas year 2025-2026 (October - September), namely at the entry point from VIP Iberico (Table 6) and at the exit point to VIP Iberico (Table 7).

Table 6 - Reserve prices of the standard capacity products for interruptible capacity at the entry point from VIP Iberico, gas year 2025-2026

PRICES OF THE TRANSMISSION TARIFF: ENTRY POINTS Interruptible capacity produts (daily horizon)	
VIP Iberico	Contracted capacity
	EUR/(kWh/day)/day
Daily	0,00018946
PRICES OF THE TRANSMISSION TARIFF: ENTRY POINTS Interruptible capacity produts (within-day horizon)	
VIP Iberico	Contracted capacity
	EUR/(kWh/h)/h
Within-day	0,00020803

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¹⁰ Available here.

Table 7 - Reserve prices of the standard capacity products for interruptible capacity at the exit point to VIP Iberico, gas year 2025-2026

PRICES OF THE TRANSMISSION TARIFF: EXIT POINTS Interruptible capacity produts (daily horizon)	
VIP Iberico	Contracted capacity
	EUR/(kWh/day)/day
Daily	0,00018680
PRICES OF THE TRANSMISSION TARIFF: EXIT POINTS Interruptible capacity produts (within-day horizon)	
VIP Iberico	Contracted capacity
	EUR/(kWh/h)/h
Within-day	0.00020509

The following tables show the reserve prices for standard interruptible capacity products at VIP Iberico, taking into account the 75% tariff discounts applicable to low-carbon gases, applicable during the gas year 2025-2026 (October to September) at the entry point from VIP Iberico (Table 8) and at the exit point to VIP Iberico (Table 9).

Table 8 – Reserve prices of the standard capacity products for interruptible capacity at the entry point from VIP Iberico, gas year 2025-2026, including a 75% discount

PRICES OF THE TRANSMISSION TARIFF: ENTRY POINTS Interruptible capacity produts (daily horizon) 75% tariff discount	
VIP Iberico (low-carbon gas)	Contracted capacity EUR/(kWh/day)/day
Daily	0,0000473
PRICES OF THE TRANSMISSION TARIFF: ENTRY POINTS Interruptible capacity produts (within-day horizon) 75% tariff discount	
VIP Iberico (low-carbon gas)	Contracted capacity EUR/(kWh/h)/h
Within-day	0,0000520

Table 9 - Reserve prices of the standard capacity products for interruptible capacity at the exit point to VIP Iberico, gas year 2025-2026, including a 75% discount

PRICES OF THE TRANSMISSION TARIFF: EXIT POINTS Interruptible capacity produts (daily horizon) 75% tariff discount	
VIP Iberico (low-carbon gas)	Contracted capacity EUR/(kWh/day)/day
Daily	0,00004670
PRICES OF THE TRANSMISSION TARIFF: EXIT POINTS Interruptible capacity produts (within-day horizon) 75% tariff discount	
VIP Iberico (low-carbon gas)	Contracted capacity EUR/(kWh/h)/h
Within-day	0,00005127

The ex-ante discount applied at the point of entry from VIP Iberico and at the point of exit to VIP Iberico is 4,6%. Its calculation follows from the formula presented in paragraph 2 of article 16 of the Tariff NC 11, and results from a unitary adjustment factor (A=1) and a probability of interruption of 4,6% (Pro=4,6%). The interruption probability value is justified in the following point.

Art. 29(b)(ii) Assessment of the probability of interruption

The discount to be applied to standard capacity products for interruptible capacity at VIP Iberico is approved by ERSE. In case the ex-ante discount is applied, ERSE sets the adjustment factor (A) and the probability of interruption (Pro), after a proposal by the transmission system operator.

In view of the absence of physical or commercial congestion at VIP Iberico, the transmission system operator developed a theoretical model to simulate the occurrence of congestion situations, and thus estimate the probability of interruption at VIP Iberico. The value obtained for the Pro parameter is 4,6%. In the case of the adjustment factor, the transmission system operator proposes a unitary value (A=1).

After analysing the assessment of the probability of interruption ¹², prepared by the transmission system operator, ERSE adopted the proposed values.

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 $^{^{11}}$ According to the aforementioned article, the ex-ante discount results from the following expression: Di_{ex-ante} = Pro × A × 100%, where «Pro» is the probability of interruption and «A» is the adjustment factor to reflect the estimated economic value of the type of standard capacity product for interruptible product.

¹² Assessment available at ERSE's webpage on the transparency information on transmission tariffs.