



KONKURENTSIAMET

CONSULTATION DOCUMENT ON THE REFERENCE PRICE METHODOLOGY FOR NATURAL GAS TRANSMISSION NETWORK TARIFFS OF ELERING AS

SEPTEMBER 2026

Contents

1. LEGAL BASES AND METHODOLOGY APPLIED.....	3
2. DETAILS OF TRANSMISSION NETWORK OPERATOR	5
3. BACKGROUND INFORMATION	6
4. SELECTION OF REFERENCE PRICE METHODOLOGY	7
4.1. Assessment of the proposed reference price methodology.....	7
4.2. Comparison of the proposed reference price methodology with the capacity weighted distance reference price methodology	9
4.3. Transmission system diagram with technical information	10
4.4. Technical transmission capacity of the gas transmission system, expected usable capacity and gas quantity and gas flow direction at the entry and exit points	11
4.5. Contracted capacities at the exit points as the basis for the calculation of the capacity-based exit price for intra-system network use	12
5. ANALYSIS OF TRANSMISSION SERVICES REVENUE.....	13
5.1. Formation of target revenue with supervision fee	20
5.2. Cost allocation assessments	22
5.3. Revenue allocation assessments	23
6. NETWORK SERVICE PRICES, MULTIPLIERS AND SEASONAL FACTORS.....	24
7. DIFFERENCE BETWEEN THE TRANSMISSION TARIFFS TO BE APPROVED AND THE TRANSMISSION TARIFFS CURRENTLY IN EFFECT AND THE ONES ESTIMATED FOR SUBSEQUENT TARIFF PERIODS.....	27
8. CONSULTATION REQUIREMENTS	29
9. SUMMARY	30

1. LEGAL BASES AND METHODOLOGY APPLIED

The Competition Authority approves the prices for network services mentioned in subsection 23(4) of the Natural Gas Act (NGA) (clause 37(3)4 of the NGA). Activities related to connection to the gas network and to the import, transmission, distribution and sale of natural gas (hereinafter gas) through the gas network must be coordinated and comply with the principles of objectivity, equal treatment and transparency in order to ensure a secure, reliable, efficient and reasonably priced gas supply that meets environmental requirements and consumer needs (subsection 1(2) of the NGA).

The network operator must submit the prices of network services and the grounds for the setting of such prices to the Competition Authority for approval and, if the Competition Authority requires this, state the reasons for the formation of those prices (subsection 23(4) of the NGA).

The prices for network services must ensure a smooth supply of gas to consumers and be justified accordingly on the basis of expenditure required for the operation and development of the network, the reliability of the network and the security of supply, the metering of the gas distributed through the network, the calculation and communication of meter readings and the return of justified profit (subsection 23(2) of the NGA).

The price of network services has to be established such that it ensures (subsection 23(3) of the NGA):

- 1) coverage of the necessary operating expenses;
- 2) the making of investments to ensure security of supply and to fulfil operational and development obligations;
- 2¹) investments to ensure continuity of a vital service;
- 3) compliance with environmental requirements;
- 4) compliance with quality and safety requirements;
- 5) a justified return on the capital invested by the undertaking;
- 6) the price of the network service must cover the justified costs of purchasing the gas used to provide that network service.

The justified return mentioned in clause 23(3)5 of the NGA is calculated based on the capital invested by the undertaking and the weighted average cost of capital (subsection 23(3¹) of the NGA).

It follows from the above that the prices for network services must be based on justified operating expenses and profitability, which is why the Competition Authority reviews the network operator's pricing when approving prices for network services. The right of review does not mean that the review is limited merely to verifying whether the undertaking's calculations are mathematically correct. The Competition Authority has the right to assess whether the components included in the network service prices (amount of network sales, variable costs, operating expenses, depreciation of fixed assets and justified return) are necessary and justified in the requested amount for providing the service (the purpose of the regulation on approval of network service prices, subsection 1(2) of the NGA).

The system operator cooperates within the European Network of Transmission System Operators for Gas both at regional and EU level in order to ensure efficient functioning of the market pursuant to the requirements established in Regulation (EC) No 715/2009 of the European Parliament and of the Council (replaced as of 13 June 2024 by Regulation (EU) 2024/1789) (subsection 16(2⁴) of the NGA). The obligations of the system operator relating to provision of gas transmission services and determination of the fee charged for those transmission services are provided in Regulation (EC) No 715/2009 of the European Parliament

and of the Council (replaced as of 13 June 2024 by Regulation (EU) 2024/1789) (subsection 16(5) of the NGA).

With regard to 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 (replaced as of 13 June 2024 by Regulation (EU) 2024/1789), Commission Regulation (EU) 2017/460 (hereinafter Regulation 2017/460) establishing a network code on harmonised transmission tariff structures for gas has been prepared. The aim of Regulation 2017/460 is that network users should be able to understand the costs underlying transmission tariffs and to reasonably forecast transmission tariffs. Hence, in order to achieve and ensure a reasonable level of cost reflectivity and predictability in such a system, transmission tariffs need to be based on a reference price methodology.

On this basis, the Competition Authority has developed and published on its website (<http://www.konkurentsiamet.ee>):

- 1) the guideline “Guidelines for the submission of data necessary for conducting a price or supervisory procedure to a gas network operator”, which describes the need for the data and explanations required from a gas network operator and the manner of their submission, so that the Competition Authority can approve gas network service prices or conduct supervision in the cases and pursuant to the procedure provided for in the NGA;
- 2) the form for submitting data necessary for conducting a price or supervisory procedure in the form of an MS Excel spreadsheet: “Tables for the approval of prices for natural gas transmission services” (questionnaire). The questionnaire has been developed on the basis of the Competition Act, the NGA and Regulation 2017/460 and, once completed, must contain the data on the basis of which the Competition Authority can conduct a price or supervisory procedure in order to verify the cost-based nature of the requested or previously approved gas network service prices (subsection 23(3) of the NGA);
- 3) the methodology for calculating the prices of network services “Methodology for Calculating the Prices of Gas Transmission Network Services ” (methodology), which adheres to the requirements set out in §§ 23 and 23² of the NGA and Regulation 2017/460. The methodology will be adhered to when approving the prices of the network services of the gas transmission system operator (subsections 23(4¹) and 23(4²) of the NGA).

The above-mentioned guideline and methodology are applied when analysing the activities of the gas transmission network operator subject to the regulation of the Competition Authority and when approving prices. In legal terms, this constitutes the prior delimitation of the Competition Authority’s discretion (specification of the regulatory methodology before the application of price regulation) and informing the subject of price regulation, which creates an opportunity for feedback and helps to avoid possible misunderstandings already before the start of a specific price regulation procedure. The guideline and methodology are not legal acts, but documents presenting the exercise of discretion by the Competition Authority as an independent regulator, having an informative, not normative, meaning outside the administration. The provisions of an administrative rule acquire actual external effect as a result of their application (judgment of the Administrative Law Chamber of the Supreme Court in administrative case No 3-3-1-81-07).

The main purpose of the methodology is to explain and give substance to the principles for designing and calculating gas transmission network service prices set out in the NGA and Regulation 2017/460.

The Competition Authority decides on the approval within 30 days following the filing of an application that meets the requirements. Where consideration of an application requires a significant amount of work, the Competition Authority may extend this time limit to 60 days, notifying the extension to the applicant before the lapsing of the initial time limit (subsection 23(5) of the NGA).

Where there is an obligation to consult on the reference price methodology (at least once every five years – Article 26(4) and Article 27(5) of Regulation 2017/460), the national regulatory authority shall take and publish a motivated decision on all items set out in Article 26(1) of Regulation 2017/460 within five months following the end of the final consultation (Article 27(4) of Regulation 2017/460).

The running of the time limit for considering an application for network service prices is suspended if information whose presentation the Competition Authority has required and which is necessary for making a decision concerning approval of the application is not presented to the Authority (subsection 23(5²) of the NGA).

2. DETAILS OF TRANSMISSION NETWORK OPERATOR

Elering AS, registry code 11022625; seat Kadaka tee 42/1, Mustamäe district, Tallinn, Harju County, 12915; email address info@elering.ee

The principal activity trade of electricity, secondary activity transmission of electricity, rental and operating of own or leased real estate, trade of gas through mains, distribution of gaseous fuels through mains, rental and leasing of other machinery, equipment and tangible goods n.e.c., other business support service activities n.e.c. and retail sale of other second-hand goods

Period of the financial year 1 January – 31 December

Share capital 274,890.000 euros, owned by the Ministry of Climate (the principal activity activities of executive and legislative bodies).

The most recently approved prices for natural gas transmission network services (hereinafter the current prices of the network service) – see Table 1, Competition Authority decision No 7-3/2023-120 of 1 September 2023.

Table 1. Current network service prices of Elering AS

	Intra-system network use		Cross-system network use	
	Capacity-based entry price, €/MWh/day per period	Capacity-based exit price, €/MWh/day per period	Capacity-based entry price, €/MWh/day per period	Capacity-based exit price, €/MWh/day per period
Gas year (Oct to Sept)	142.77	Not implemented	142.77	142.77
Year (Jan-Sept) ¹	106.88	Not implemented	106.88	106.88
First quarter (Oct to Dec) ²	39.48	Not implemented	39.48	39.48
Second quarter (Jan to March)	39.05	Not implemented	39.05	39.05

¹ Capacity-based entry price 142.77 €/MWh/day per year / number of calendar days of the tariff period 366 days (year 2024) × number of calendar days for the period from 01.01.2024 to 30.09.2024 274 days = 106.88 €/MWh/day per gas year.

² Capacity-based entry price 142.77 €/MWh/day per year / number of calendar days of the tariff period 366 days (year 2024) × number of calendar days of the first quarter (Oct to Dec) 92 days × quarterly capacity product multiplier 1.1 = 39.48 €/MWh/day per quarter. The capacity-based entry prices for intra-system and cross-system network use for the second, third and fourth quarter have been calculated in the same way.

Third quarter (April to June)	39.05	Not implemented	39.05	39.05
Fourth quarter (July to Sept)	39.48	Not implemented	39.48	39.48
October ³	15.12	Not implemented	15.12	15.12
November	14.63	Not implemented	14.63	14.63
December	15.12	Not implemented	15.12	15.12
January	15.12	Not implemented	15.12	15.12
February	14.14	Not implemented	14.14	14.14
March	15.12	Not implemented	15.12	15.12
April	14.63	Not implemented	14.63	14.63
May	15.12	Not implemented	15.12	15.12
June	14.63	Not implemented	14.63	14.63
July	15.12	Not implemented	15.12	15.12
August	15.12	Not implemented	15.12	15.12
September	14.63	Not implemented	14.63	14.63
Day ⁴	0.59	7.56	0.59	0.59
Intraday ⁵	0.66	7.56	0.66	0.66

3. BACKGROUND INFORMATION

On 2 April 2026, the Competition Authority registered Elering AS's (hereinafter Elering or TSO) application No 1.1-11/2026/331 for the approval of capacity-based exit prices for intra-system network use at **0.48 €/MWh/h per day** and **0.48 €/MWh/h intraday**. Other network service prices were not changed.

On 30 April 2026, the Competition Authority sent a letter to the TSO recommending that it also consider alternative approaches to setting the above-mentioned network service prices.

On 22 June 2026, 2 July 2026 and 6 July 2026, Elering submitted amended calculations for the approval of the capacity-based exit price for intra-system network use and an overview of the revenue received through capacity-based entry prices for intra-system network use during the period from 1 April 2025 to 31 March 2026, i.e. before the application of 2 April 2026.

On 9 July 2026, the Competition Authority registered Elering's final calculation for the approval of the capacity-based exit price for intra-system network use at **170.29 €/MWh/day per year** (hereinafter the application). Other network service prices were not changed.

The following provides an overview of the formation of Elering's natural gas transmission network service prices, taking into account the data presented in the application and the additional information received.

³ Capacity-based entry price 142.77 €/MWh/day per year / number of calendar days of the tariff period 366 days (year 2024) × number of calendar days in October 31 days × monthly capacity product multiplier 1.25 = 15.12 €/MWh/day per month. The capacity-based entry prices for intra-system and cross-system network use for the remaining 11 months have been calculated in the same way.

⁴ Capacity-based entry price 142.77 €/MWh/day per year / number of calendar days of the tariff period 366 days (year 2024) × daily capacity product multiplier 1.5 = 0.59 €/MWh/day per day. Capacity-based exit price 2,766.87 €/MWh/day per year / number of calendar days of the tariff period 366 days (year 2024) = 7.56 €/MWh/day per day.

⁵ Capacity-based entry price 142.77 €/MWh/day per year / number of calendar days of the tariff period 366 days (year 2024) × daily capacity product multiplier 1.7 = 0.66 €/MWh/day per intraday. Capacity-based exit price 2,766.87 €/MWh/day per year / number of calendar days of the tariff period 366 days (year 2024) = 7.56 €/MWh/day per intra-day.

4. SELECTION OF REFERENCE PRICE METHODOLOGY

4.1. Assessment of the proposed reference price methodology

Reference price methodology means the methodology applied to the part of the transmission services revenue to be recovered from capacity-based transmission tariffs with the aim of deriving reference prices (Article 3(2) of Regulation 2017/460). Article 6(1) of Regulation 2017/460 sets out that the reference price methodology is established by the national regulatory authority (the Competition Authority) by its decision after final consultation. Estonia, Latvia and Finland have decided on the creation of a common gas market (FinEstLat). As a first stage starting from 01.01.2020, the FinEstLat common market area was implemented. The common market area must be as simple to use and comprehensible as possible for market participants. This requires cooperation between national system operators and regulators in the selection of the reference price methodology to be used. For this purpose, the regulators of the Baltic States and Finland carried out an international procurement to commission a study titled 'Tariff model for the natural gas entry-exit system for the common Baltic-Finnish market'. The winner of the procurement and the body conducting the research was Baringa Partners LLP (United Kingdom). In the first phase of the study, the Postage Stamp, Capacity Weighted Distance (CWD) and Matrix reference price methodologies were compared. The results of the comparison are presented in Table 2.

Table 2. Comparison of reference price methodologies

Kriteerium	Kaalutus	Hinne (4 palli süsteemis)		
		Postmark	Võimsusega kaalutud kaugus (CWD)	Maatriks
Majanduslik efektiivsus	Lühikeses perspektiivis postmargil madalaimad kulud tarbijatele (kõige kõrgem tarbijate heaolu), sest odavam gaas pääseb alati turule.	3	2	2
Pikaajaline tarbijate heaolu	CWD ja maatriks annavad paremaid stiimuleid gaasivõrgu arendamiseks (laiendamiseks). Väheoluline gaasitarbimise kahanemise tingimustes.	2	3	3
Konkurents gaasiturul	Erinevate tarneallikate võrdne kohtlemine soodustab konkurentsi. Sisendtariffide erinevuse võib domineeriv tarnija ära kasutada erinevate gaasihindade kehtestamisega, mis pärivad konkurentsi. Madala nõudluse paindlikkuse juures väljundtariffide erinevus ei avalda mõju konkurentstile.	3	2	1
Lihtsus ja arusaadavus	Postmark on kõige lihtsam ja arusaadavam meetod tarbijatele. Maatriks on kõige tömahukam ja keerulisem meetod.	3	2	1
Süsteemihaldurite vahelise ragavoogude minimeerimine	Postmark tekitab suurima rahavoo süsteemihaldurite vahel. Maatriks kõige vähem.	1	2	3
Kokku		12	11	10

Table 2 shows that the Postage Stamp reference price methodology provides the best results for consumers. In its study, Baringa Partners LLP found that the social welfare produced in the region under the Postage Stamp reference price methodology is €39 million higher than under the Capacity Weighted Distance (CWD) and €296 million higher than the Matrix reference price methodology.

The biggest disadvantage of the conventional Postage Stamp reference price methodology (all entries have the same price and all exits have the same price) is the large cash flows between transmission system operators, which have to be compensated through the inter-transmission

system operator compensation (ITC) mechanism. In order to minimise ITC, Estonia, Latvia and Finland agreed on the following shared element of the reference price methodology:

- a separate Postage Stamp reference price methodology is used to calculate entry and exit prices for each country;
- interconnection points between countries participating in the common gas market will be removed (including the Inčukalns gas storage facility);
- entry prices for entry points in the common gas market are adjusted by each national regulator to the extent that the average price in the European Union is reached with a standard error (based on Article 6(4)(c) of Regulation 2017/460);
- cash flows (ITCs) between system operators are minimised through different national exit prices;
- countries participating in the common gas market use harmonised capacity product multipliers and seasonal factors (based on Article 13 of Regulation 2017/460).

Assessment of the proposed reference price methodology (Postage Stamp methodology with the shared elements mentioned above) in accordance with Article 7 of Regulation 2017/460:

- the Postage Stamp reference price methodology complies with Article 13 of Regulation (EC) No 715/2009, as the network service tariffs designed by that method are transparent, take into account the need for system integrity and its further development and reflect the actual costs. Tariffs are applied in a non-discriminatory manner.
- the Postage Stamp reference price methodology allows network users to calculate with sufficient precision the estimated reference price using the cost components and estimated capacity quantities published in the consultation;
- the Postage Stamp reference price methodology makes it possible to take into account the actual costs of the transmission service in each country participating in the market area;
- equal regional entry prices and equal exit prices by country ensure equal treatment of network users across countries. As tariffs are not applied at the interconnection points of the market area, there is no undue cross-subsidisation.
- a common equal entry price for the market area avoids unnecessary transnational transmission volumes and minimises volume risk for end-users;
- The Postage Stamp reference price methodology, where entry prices in the market area are harmonised, does not distort cross-border gas trade.

The study “*Gas transmission tariff design for the Estonian domestic exit tariff*”, prepared by THEMA Consulting Group and completed on 3 November 2025 (hereinafter the study of the calculation of the intra-system exit price), also shows that the use of the Postage Stamp reference price methodology in Estonia is justified, as it ensures transparency, cost reflectivity and equal treatment in the formation of the reference price and helps to avoid significant volume risk for end-users (for further details, see the non-confidential summary of the study in Annex 1 to the consultation document).

4.2. Comparison of the proposed reference price methodology with the capacity weighted distance reference price methodology

Article 26 of Regulation 2017/460 provides that, during consultation, where the proposed reference price methodology is other than the capacity weighted distance reference price methodology, a comparison of those methods is to be carried out (clause 6 of the methodology). The parameters for the capacity weighted distance reference price methodology shall be as follows (clause 6.1 of the methodology):

- a) the part of the transmission services revenue to be recovered from capacity-based transmission tariffs;
- b) the forecasted contracted capacity at each entry point or a cluster of entry points and at each exit point or a cluster of exit points;
- c) where entry points and exit points can be combined in a relevant flow scenario, the shortest distance of the pipeline routes between an entry point or a cluster of entry points and an exit point or a cluster of exit points;
- d) the combinations of entry points and exit points, where some entry points and some exit points can be combined in a relevant flow scenario;
- e) The entry-exit revenue split must be 50:50.

Where entry points and exit points cannot be combined in a flow scenario, this combination of entry and exit points shall not be taken into account (clause 6.1 of the methodology).

The Competition Authority, considering the above and the fact that since the beginning of 2023, Elering does not have any entry points which generate revenue from transmission services, therefore the TSO does not have any entry points to connect to the flow scenario. Trade at the border points of Värskä and Narva (network connection points with Russia) has been prohibited under the Government of the Republic Regulation No 93 of 29 September 2022⁶, and the Paldiski LNG connection is unlikely to be used. Therefore, it is not possible to compare the reference price methodologies for the capacity-based **entry price** for intra-system network use between the proposed reference price methodology designed to be different from the capacity weighted distance reference price methodology (the Postage Stamp reference price methodology) with the aforementioned distance-based reference price methodology.

The comparison of the reference price methodologies for the capacity-based **exit price** for intra-system network use has been prepared in the study of the calculation of the intra-system exit price. The comparison shows that *both methodologies to fulfil the criteria described in Article 7 of the NC TAR. The postage stamp methodology is marginally more transparent, and the CWD methodology is potentially more cost reflective if price signals for future investments are considered. When considering the Estonian context, however, the implementation of a CWD methodology poses several problems. Firstly, the recent closure of the interconnectors to Russia has significantly and abruptly changed the structure of the gas network. Branches in the network that were used to transport gas across Estonia have now become dead ends. This means that customers located close to the Russian entry points are now located far away from active entry points. If tariffs were set on this basis, customers close to the Russian border would find themselves facing far higher tariffs despite having done nothing wrong. Secondly, the Misso exit point is not served by the entry points to Elering's network, making it difficult to assign this point a CWD tariff that meaningfully reflects the distance of the network used. In conclusion, the proposed postage stamp capacity*

⁶ Imposed by the Government of the Republic of Estonia under subsection 27 (1) of the International Sanctions Act under regulation 'Imposition of a sanction of the Government of the Republic of Estonia to ban the purchase of natural gas and LNG due to the aggression of the Russian Federation in Ukraine, supported by the Republic of Belarus'.

subscription tariff is expected to remove several key deficiencies associated with the current tariff design and to comply with the requirements of the TAR NC.

4.3. Transmission system diagram with technical information

In the tariff period, Elering owns and operates, for the purpose of providing natural gas transmission service, Estonia's gas transmission network, which consists of 976.4 km of gas pipelines, of which 38.5 km is the Balticconnector offshore pipeline (see Table 3 for more details), 4 gas metering stations where the quantities of gas entering the transmission network are measured and gas quality is determined, 37 gas distribution stations where the pressure of gas exiting the transmission network is reduced, quantities are measured, the gas is odorised and the agreed consumption regime is ensured, and 1 gas pressure regulation station (Kiili), which enables parts of the transmission network to be operated at different working pressures (see Figure 1). The quantity of gas is also measured at the Kiili gas pressure regulation station, but the Kiili station is not directly classified as a gas metering station. At the end of 2022, a network connection was also completed to connect a potential LNG floating storage and regasification unit (FSRU) to the transmission network. The gas metering station in Värskä is closed and no gas trading takes place there; however, the station analyses gas quality at the end of the pipeline located in Estonia. The gas quality for the Misso stations is determined at the gas metering station in Latvia, from where gas flows to Misso.

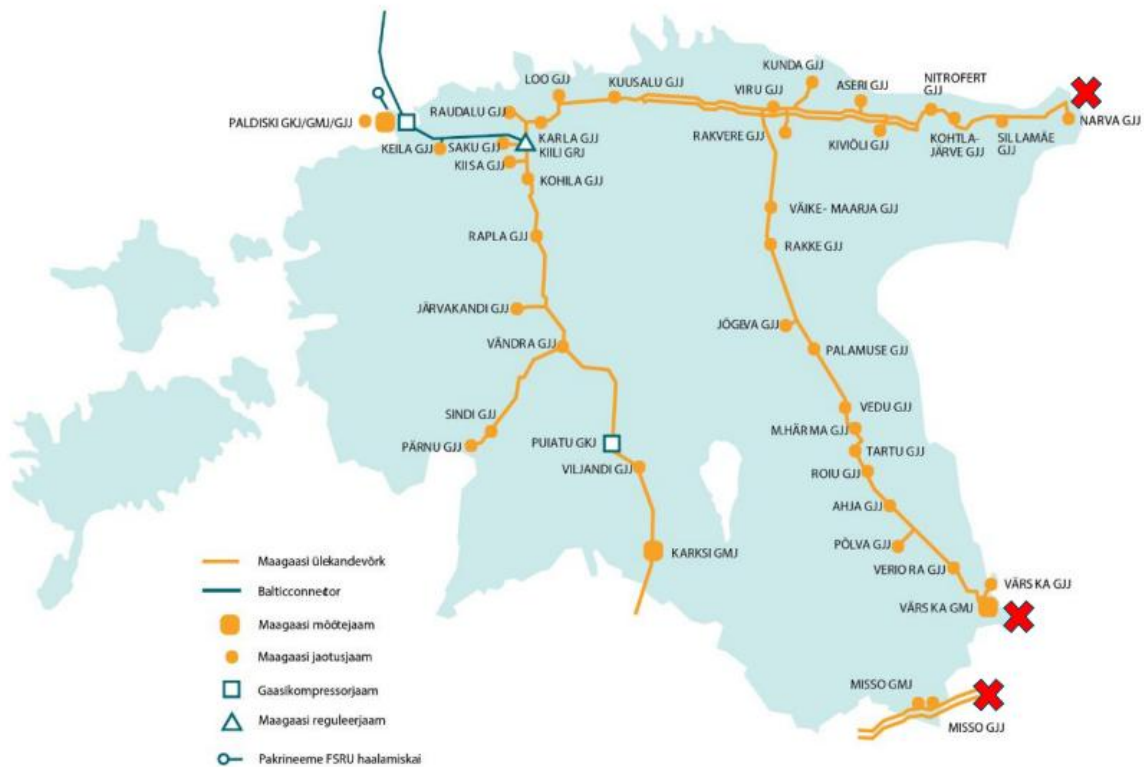


Figure 1. Estonian gas transmission network

Table 3. Gas pipeline data for Estonian gas transmission network

Gas pipeline	Year of construction	Length, km	Diameter (DN), mm	Maximum Operating Pressure (MOP), bar
Vireši - Tallinn	1991/92	202.6	700	46.0
Vändra - Pärnu	2005/06	50.2	250	54.0
Tallinn - Jõhvi I	1951/53	97.5	200	30.0
Tallinn - Jõhvi II	1962/68	148.3	500	30.0
Jõhvi - Narva	1955	46.1	350/400	30.0
Irboska - Värskas GMJ	1975	10.1	500	45.0
Värskas GMJ - Tartu	1975	75.8	500	45.0
Tartu - Rakvere	1979	132.8	500	45.0
Irboska - Inčukalns*	1984	21.3	700	-
Valdai - Pihkva - Riia	1972	21.3	700	48.0
Kiili - Paldiski (Balticconnector)	2019	53.7	700	54.0
Balticconnector'i sea pipeline	2019	38.5	500	80.0
Paldiski LNG connection onshore pipeline	2022	0.5	500	80.0
Paldiski LNG connection offshore pipeline	2022	0.8	500	80.0
Branch pipelines	1951/2013	76.9	-	-
Total		976.4		

* The Irboska–Inčukalns pipeline is closed at Luhamaa and on the Latvian side and does not supply gas to the system

The data on compressor stations are as follows:

Paldiski compressor station:

- Power consumption of the compressor station approximately 6–10 MW
- Gas transmission capacity of the compressor station 81.2 GWh per day

Puistu compressor station:

- Power consumption of the compressor station approximately 6–10 MW
- Transmission capacity of the compressor station 105 GWh per day

4.4. Technical transmission capacity of the gas transmission system, expected usable capacity and gas quantity and gas flow direction at the entry and exit points

The technical capacity of the Estonian gas transmission system, the estimated usable capacity and the quantity of gas and the direction of the gas flow are provided in Table 4.

Table 4. Estonian gas transmission system capacities, gas quantity and gas flow direction at entry and exit points

Entry and/or exit point	Border point / interconnection point	Technical transmission capacity ⁷ , GWh/day	Estimated transmission capacity in use, GWh/day	Gas quantity, GWh per year	The direction of gas flow
Karksi	Interconnection point	112.5	71.3	2 776.3	From Estonia to Latvia
			81.4	9 076.4	From Latvia to Estonia
Paldiski	Interconnection point	81.2	71.9	6 270.5	From Estonia to Finland
			76.1	3 847.0	From Finland to Estonia

⁷ Technical transmission capacity is the calculated capacity of pipelines at the maximum pressures at the entry points that the technical condition of the pipelines allows to be applied.

Entry and/or exit point	Border point / interconnection point	Technical transmission capacity: GWh/day	Estimated transmission capacity in use, GWh/day	Gas quantity, GWh per year	The direction of gas flow
Paldiski LNG connection	Border point	113.0	0.0	0.0	From Estonia to Estonia
TOTAL		306.7	81.4	12 923.4	From Estonia, Latvia and Finland to Estonia
				9 046.8	Through Estonia to Latvia and Finland
				3 876.7	Gas remaining in Estonia

The Estonian gas transmission system has a total technical capacity of 306.7 GWh/day (provided that a floating terminal with regasification capability is connected to the Paldiski LNG connection). Through Balticconnector, the gas can flow from Finland to Estonia or Latvia (passing through Estonia) and vice versa. For the maximum usable capacity (estimated capacity to be used) from the capacity of the pipelines, the daily capacity calculated on the basis of the capacity actually used in one hour during the period from 1 April 2025 to 31 March 2026, i.e. during the 12 months preceding the application of 2 April 2026 (maximum hourly capacity for the period $\times 24$ hours). The quantities and flow directions of gas entering and exiting the Estonian gas transmission network also reflect the actual situation during the period from 1 April 2025 to 31 March 2026, i.e. during the 12 months preceding the application of 2 April 2026.

4.5. Contracted capacities at the exit points as the basis for the calculation of the capacity-based exit price for intra-system network use

The assessment of contracted network capacity is important as they are generally the basis for calculating reference prices. The reference price is obtained with the sum of the justified costs and profitability necessary to enable the use of the network, ie the provision of the gas transmission service, ie the transmission service revenue, is divided by the forecasted contractual capacity for network use (clause 5.7 of the methodology). However, reference prices may also be formed on the basis of other justified parameters.

The calculation of the price of a network service are based on the average (arithmetic mean) amount of sales during the last three calendar years. Where necessary, further analysis is conducted in order to determine the amount of sales (subsection 23² (1) of the NGA). The NGA does not define in which units and how sales quantity (and prices) should be accounted for (capacity-based or commodity-based sales quantity and price). Article 4 of Regulation 2017/460 sets out that, as a general rule, capacity-based transmission tariffs are to be used, as an exception, subject to the approval of the national regulatory authority, a part of the transmission services revenue may be recovered by commodity-based transmission tariffs if the following conditions are met (clause 7.2 of the methodology):

- levied for the purpose of covering the costs mainly driven by the quantity of the gas flow;
- calculated on the basis of forecasted or historical flows, or both, and set in such a way that it is the same at all entry points and the same at all exit points.

The methodology allows the use of both the capacity-based sales quantity [MWh/day per year] and the commodity-based sales quantity [MWh per year] (clause 7.3 of the methodology). The sales volume is estimated for the following components (clause 7.4 of the methodology):

- the transmission capacity [MWh/day/year] of intra-system use and/or the commodity-based quantity MWh per year (in the case of a balanced network, the entry quantity is equal to the exit quantity);
- the transmission capacity [MWh/day/year] of cross-system use and/or the commodity-based quantity MWh per year (in the case of a balanced network, the entry quantity is equal to the exit quantity).

The contractual capacities of the exit points used as the basis for calculating Elering's capacity-based exit price for intra-system use (total 147,365 MWh/day per year)

Elering calculates the contracted capacities of the exit points (hereinafter referred to as network usage capacity) to be 147,365 MWh/day per year for the calculation of the capacity-based exit price for intra-system network use for the tariff period⁸. This capacity is based on the maximum network usage capacities agreed between Elering and the users of the network service. The study of the calculation of the intra-system exit price shows that *Elering is contractually obligated to give each customer access to the capacity stated in their contract. These contracts have no end date, and Elering has no means of terminating them unilaterally. Even customers with a subscribed capacity below their contractual capacity would be entitled to access the capacity stated in their contract. As a result, Elering cannot, in practice, reduce capacity in the network below the level stated in the contract. Since Elering is contractually obligated to maintain the capacity stated in the contract, this capacity is the primary cost driver for the gas network. The cost of maintaining the network reflects the amount of transmission capacity that must be maintained rather than the volume of gas consumed. Making tariffs more cost-reflective would give customers better incentives to update their level of connection capacity and, therefore, improve long-term system efficiency. Under the current system, occasional users of their exit capacity pay far less than customers who utilise a significant proportion of their exit capacity despite similar costs to serve. This results in the cross-subsidisation of occasional users. Absent changes to the tariff regime, an occasional user that derives less value from its connection than its cost to serve has no incentive to reduce its contractual exit capacity. This is inefficient and results in customers retaining uneconomic transmission connections. Therefore, Elering considers it justified to calculate the network usage capacity for the tariff period on the basis of the maximum network usage capacities agreed between the TSO and the users of the network service, totalling 147,365 MWh/day per year.*

5. ANALYSIS OF TRANSMISSION SERVICES REVENUE

A gas undertaking must, in its internal accounting rules, establish principles which require the accounts for transmission, distribution and sale of gas and for any activity area unrelated to these activities to be kept in the manner that separate undertakings operating in these areas of activity would be obligated to (subsection 8 (2) of the NGA). A gas undertaking must establish accounting rules regarding the classification of assets and liabilities and of items of revenue and expenditure, to be followed in keeping the accounts of the fields of activity mentioned in subsection 8 (2) of the NGA (subsection 8 (2²) of the NGA).

⁸ Tariff period means the time period during which a particular level of reference price is applicable, which minimum duration is one year and maximum duration is the duration of the regulatory period (Article 3(23) of Regulation 2017/460). In the consultation document, the Competition Authority considers the year 2027 as the tariff period, for which the approved network service prices may remain in effect until the end of the regulatory period, ie the end of 2031, unless the TSO requests a change in prices earlier. Regulatory period means the time period for which the general rules for the allowed or target revenue are set in accordance with Article 41(6)(a) of Directive 2009/73/EC (Article 3(5) of Regulation 2017/460).

In the price proceedings, the Competition Authority allocates the components of the target revenue related to the transmission service as follows (distinguishing between intra-system and cross-system transmission components) (clause 5.2 of the methodology):

- 1) variable costs;
- 2) operating costs;
- 3) depreciation of fixed assets;
- 4) justified profitability.

Variable costs relate to the use of services or goods that are directly related to the sales volume of the gas network service (eg the quantity of gas used to operate the network, the cost of electricity or gas energy consumption required to heat the gas in pressure regulators (lowerers) and the cost of operating compressors, etc) (clause 9.2 of the methodology). Variable costs are determined by multiplying the justified acquisition prices of the necessary services or goods by the purchased quantity of the service or goods (clause 9.3 of the methodology). Variable costs may include non-controlled costs (clause 8.2 of the methodology). Non-controlled prices and costs are not influenced by the economic activity of the undertaking, but are entirely dependent on external factors (eg administratively regulated service charges) (clause 8.1 of the methodology). In cases where non-controlled costs are justified (verified), they are subject to the full prices recognition principle (clause 8.3 of the methodology). Specific costs and revenues are taken into account in the case of system operators, such as the costs and revenues of the inter-transmission system operator compensation (ITC) mechanism and counter-trade cost and revenues. The accounting of such costs and revenues is consistent (clause 8.4 of the methodology).

Operating costs are costs that do not include variable costs, financial charges and the depreciation of fixed assets. Operating costs are not directly related to the quantity of sales and an undertaking can influence these costs through its more efficient economic activities (excluding non-controlled operating costs). Operating costs include the costs of maintenance and repair of the gas network carried out by the undertaking, outsourced works and services, sales costs, transport costs, rental costs, IT costs, office costs, labour costs, non-controlled costs (state duty, land tax, state-established infrastructure toleration fee) (clause 10.2 of the methodology).

The expenses included in the price must be justified, and must be based on cost efficiency and allow the undertaking to carry out the duties prescribed by law. The following principles are observed in assessing justified operational expenses (subsection 23² (3) of the NGA):

- 1) observation of the dynamic of expenses in time and its comparison with the dynamics of the consumer price index (CPI);
- 2) detailed analysis (including expert assessments) of the justifiability of different expense components;
- 3) comparison of the undertaking's expenses and of the statistical parameters calculated on their basis with the expenses of other similar undertakings.

Monitoring the dynamics of costs in time means comparing the change in the operating costs of an undertaking by year with the CPI. Generally, the operating costs of a monopoly undertaking may not increase more than the costs of undertakings providing free market services, which are expressed in the growth of the CPI. When applying the CPI in their regulatory activities, the Competition Authority also takes into account the obligation provided in subsection 23² (3) of the NGA that costs included in the price have to be based on cost-effectiveness. The CPI values of previous years are taken from the website of Statistics Estonia www.stat.ee and the CPI of the current year from the economic forecast of the Ministry of Finance, which is published on www.fin.ee (clause 10.3 of the methodology).

To carry out a thorough analysis of cost components, the undertaking has to submit a detailed distribution of the operating costs of the last three financial years, and a forecast for the tariff period. Undertakings also have to justify the need, change and cost-effectiveness of the applied operating costs, primarily based on the following principles (clause 10.4 of the methodology):

- the undertaking must have actually incurred the costs in previous periods (evidenced by invoices, contracts, wages paid, etc.);
- the costs have to be directly related to the provision of network services (if necessary, costs may be distributed between various activities);
- the costs have to be necessary for the provision of network services (evidenced by the undertaking's explanation on how the cost changed the service for the consumer, such as the quality of the network service);
- the costs have been incurred in the most cost-effective manner (evidenced by price quotes and their responses).

When assessing whether operating costs are justified, the Competition Authority has the right to include experts, if necessary (clause 10.4 of the methodology).

It is not possible to compare the costs of an undertaking and the statistical indicators calculated on the basis thereof with the costs of other similar undertakings domestically in the case of a transmission system operator, as there is only one transmission system in Estonia. International comparisons may not be reasonable as transmission system operators from different countries operate in different economic environments (clause 10.5 of the methodology).

The price does not include the following expense items (subsection 23² (2) of the NGA):

- 1) expenses related to claims unlikely to be collected;
- 2) sponsorships, gifts and donations;
- 3) expenses unrelated to principal activities;
- 4) fines and late interest charged on the basis of legislation;
- 5) finance expenses;
- 6) expenses related to income tax charged on dividend payments;
- 7) other expenses not required for the performance of duties imposed on the undertaking by law.

Depreciation of fixed assets (cost of capital) – costs included in service price related to writing off the depreciable proportion of fixed assets (except land) over their technical useful life (clause 2.16 of the methodology). The purpose of calculating the depreciation of fixed assets is to recover the costs incurred in the acquisition of fixed assets through the price of the network service during the technical useful life of the fixed assets⁹ (clause 11.3 of the methodology). The calculation of the depreciation charge for fixed assets is based on the value of the fixed assets required for the provision of network service and the rate of depreciation which corresponds to the technical useful life of the fixed assets (subsection 23² (9) of the NGA). The rate of depreciation is the inverse of the technical useful life of the asset. Different fixed assets may have different technical useful lives and, accordingly, depreciation rates. When justifying the technical useful life of fixed assets, the Competition Authority checks the following (clause 11.4 of the methodology):

⁹ Useful technical life of fixed assets – a period during which an undertaking is likely to use the assets, which takes into account the expected physical (technical) wear and tear of fixed assets and, in the case of fixed assets related to IT, moral depreciation (clause 2.15 of the methodology).

- a) expected period of use of fixed assets;
- b) expected physical wear and tear of fixed assets;
- c) technical or moral obsolescence of fixed assets.

The calculation of the depreciation of fixed assets is based on a linear method (clause 11.5 of the methodology). Depreciation of fixed assets is calculated on the basis of the cost of the fixed assets necessary for the provision of the network service and the depreciation rate corresponding to the useful life of the fixed assets (clause 11.6 of the methodology). Fixed assets invested in the current calendar year are included in the depreciation of fixed assets for that year in such a way that the cost of the invested asset is multiplied by a coefficient of 0.5. In subsequent years, when accounting for the depreciation of fixed assets, the total cost is taken into account. Regulated fixed assets (sales, liquidation, write-off) that have been removed from accounting in the current year are included in the depreciation of fixed assets for that year in such a way that the cost of the removed fixed assets is multiplied by a coefficient of 0.5 (clause 11.7 of the methodology).

Return of justified profit – operating profit calculated by multiplying the value of regulated assets and the WACC (clause 2.18 of the methodology). The justified profitability mentioned in clause 23(3)5 of the NGA is calculated based on the capital invested by the undertaking and the weighted average cost of capital (subsection 23 (3¹) of the NGA). The calculation of justified profitability is based on the principle according to which the value of the fixed assets required for the provision of network service, plus the amount of working capital, is multiplied by the weighted average cost of capital (subsection 23² (7) of the NGA). The amount of the working capital referred to in subsection 23² (7) of the NGA is five percent of the average (arithmetic mean) turnover of the last three calendar years. If necessary, a further analysis is performed in order to determine the amount of the working capital (subsection 23² (8) of the NGA). In order to determine the weighted average cost of capital, ie *WACC* the Competition Authority has developed a guideline called ‘Guideline for calculating the weighted average cost of capital’, which was approved on 18 June 2025 by directive No 1-2/2023-015 of the Director General of the Competition Authority. This guideline, which sets out the weighted average capital prices for electricity, heat, gas, water and universal postal service operators, has been published on the Competition Authority’s website at <http://www.konkurentsiamet.ee>. Table 8 under clause 5 of the guideline has the **weighted average cost of capital (WACC) to the gas transmission system operator at 5.55%**. The Competition Authority applies this WACC indicator as of 1 July 2025.

Target revenue means the sum of expected transmission services revenue and expected non-transmission services revenue earned by the transmission system operator within a one-year regulatory period under a price cap regime. Transmission service revenue comprises revenue from the transmission of capacity and/or commodity of groups of similar interconnection points (intra-system entry points and exit points, cross-system entry and -exit points). Non-transmission service revenues are revenues received by the transmission system operator from the provision of the transmission service and from other non-transmission services provided (possible revenues include, for example, additional revenues from auctions, revenues from under-use charges, revenues from operating the data exchange platform and issuing certificates of origin, etc) (clause 3 of the methodology).

According to Regulation 2017/460, the target revenue of the system operator is calculated using the following formula¹⁰ (clause 5.3 of the methodology):

$$R_S = R_{S-ük} + R_{ms} = Revenue_{cap}^{intra} + Revenue_{cap}^{cross} + R_{ms}$$

where:

- R_S - Target revenue of system operator
- $R_{S-ük}$ - transmission services revenue;
- $Revenue_{cap}^{intra}$ - revenues from capacity tariffs collected for intra-system network use;
- $Revenue_{cap}^{cross}$ - revenues from capacity tariffs collected for cross-system network use;
- R_{ms} - non-transmission services revenue.

Revenues from transmission services for intra-system and cross-system network use are defined according to the following formulae (clause 5.4 of the methodology):

$$Revenue_{cap}^{intra} = MK_{cap}^{intra} + TK_{cap}^{intra} + PK_{cap}^{intra} + PT_{cap}^{intra}$$

$$Revenue_{cap}^{cross} = MK_{cap}^{cross} + TK_{cap}^{cross} + PK_{cap}^{cross} + PT_{cap}^{cross}$$

where:

- MK - variable costs of capacity-based (cap) services for intra-system (intra) and cross-system (cross) network uses;
- TK - operating costs of capacity-based (cap) services for intra-system (intra) and cross-system network uses;
- PK - depreciation of fixed assets of capacity-based (cap) services for intra-system (intra) and cross-system (cross) network uses;
- PT - return of justified profit of capacity-based (cap) services for intra-system (intra) and cross-system (cross) network uses;

Therefore, the target revenue is defined as the sum of justified costs and return of justified profit (*ex-ante* regulation), to which are added revenues not related to the transmission service of the previous period (*ex-post* regulation) (clause 3 of the methodology).

From the other side, the system operator's target revenue (R_S) is collected from the sale of services in the following formula (clause 5.6 of the methodology):

$$R_S = R_{sisend}^{intra} + R_{väljund}^{intra} + R_{sisend}^{cross} + R_{väljund}^{cross} + R_{ms}$$

¹⁰ As Elering does not wish to apply commodity-based transmission tariffs, the given formula and all other formulas presented below do not include components related to commodity-based transmission tariffs in order to simplify the formulas.

where:

R_S	- Target revenue of system operator
$R_{sisend}^{intra} = R_{sisend-cap}^{intra} + R_{sisend-comm}^{intra}$	- the amount of revenue from the transmission of intra-system network use entry point capacity (cap);
$R_{väljund}^{intra} = R_{väljund-cap}^{intra} + R_{väljund-comm}^{intra}$	- the amount of revenue from the transmission of intra-system network use exit point capacity (cap);
$R_{sisend}^{cross} = R_{sisend-cap}^{cross} + R_{sisend-comm}^{cross}$	- the amount of revenue from the transmission of cross-system network use entry point capacity (cap);
$R_{väljund}^{cross} = R_{väljund-cap}^{cross} + R_{väljund-comm}^{cross}$	- the amount of revenue from the transmission of cross-system network use exit point capacity (cap);
R_{ms}	- non-transmission services revenue.

The entry-exit multipliers of the transmission service for intra-system network use are calculated using the following formula (clause 5.6 of the methodology):

$$K_{intra}^{sisend} = \frac{R_{sisend}^{intra}}{R_{sisend}^{intra} + R_{väljund}^{intra}} \quad \text{and} \quad K_{intra}^{väljund} = \frac{R_{väljund}^{intra}}{R_{sisend}^{intra} + R_{väljund}^{intra}},$$

where:

K_{intra}^{sisend} and $K_{intra}^{väljund}$	- factors characterising the ratio of entry revenues and exit revenues to intra-system network revenues. The sum of these factors is 1.
--	---

The entry-exit multipliers of the transmission service for cross-system network use are calculated using the following formula (clause 5.6 of the methodology):

$$K_{cross}^{sisend} = \frac{R_{sisend}^{cross}}{R_{sisend}^{cross} + R_{väljund}^{cross}} \quad \text{and} \quad K_{cross}^{väljund} = \frac{R_{väljund}^{cross}}{R_{sisend}^{cross} + R_{väljund}^{cross}}$$

where:

K_{cross}^{sisend} and $K_{cross}^{väljund}$	- factors characterising the ratio of entry revenues and exit revenues to cross-system network revenues. The sum of these factors is 1.
--	---

The ratios of the total system entry and exit revenues allocation are calculated using the following formula (clause 5.6 of the methodology):

$$K_{sisend} = \frac{R_{sisend}^{intra} + R_{sisend}^{cross}}{R_{sisend}^{intra} + R_{väljund}^{intra} + R_{sisend}^{cross} + R_{väljund}^{cross}} \quad \text{and}$$

$$K_{väljund} = \frac{R_{väljund}^{intra} + R_{väljund}^{cross}}{R_{sisend}^{intra} + R_{väljund}^{intra} + R_{sisend}^{cross} + R_{väljund}^{cross}}$$

The values of the multiplier K show how different market participants contribute to the revenues of the transmission service (clause 5.6 of the methodology).

The intra-system and cross-system network use cost allocation assessments indicate the degree of cross-subsidisation between intra-system and cross-system network use based on the proposed reference price methodology. The assessment of the allocation of costs of intra-system and cross-system network is based on the regulation set out in Article 5 of Regulation 2017/460 as follows (clause 5.5 of the methodology):

- a) the transmission services capacity revenue to be obtained from intra-system network use at both all entry points and all exit points shall be divided by the value of the relevant capacity cost driver for intra-system network use in accordance with the following formulae:

$$Ratio_{cap}^{intra} = \frac{Revenue_{cap}^{intra}}{Driver_{cap}^{intra}}$$

where:

$Driver_{cap}^{intra}$ - is the value of capacity-related cost driver(s) for intra-system network use, such as the sum of the average daily forecasted capacities contracted at each intra-system entry point and intra-system exit point, or cluster of points, and is defined in a measurement unit such as MWh/day.

- b) the transmission services capacity revenue to be obtained from cross-system network use at both all entry points and all exit points shall be divided by the value of the relevant capacity cost driver for cross-system network use in accordance with the following formulae:

$$Ratio_{cap}^{cross} = \frac{Revenue_{cap}^{cross}}{Driver_{cap}^{cross}}$$

where:

$Driver_{cap}^{cross}$ - is the value of capacity-related cost driver(s) for cross-system network use, such as the sum of the average daily forecasted capacities contracted at each cross-system entry point and intra-system exit point, or cluster of points, and is defined in a measurement unit such as MWh/day.

- c) the cost allocation comparison index between the ratios referred to in points (a) and (b), which is defined in percentage, shall be calculated in accordance with the following formulae:

$$Comp_{cap} = \frac{2 \times |Ratio_{cap}^{intra} - Ratio_{cap}^{cross}|}{Ratio_{cap}^{intra} + Ratio_{cap}^{cross}} \times 100\%$$

If the comparison index ($Comp_{cap}$) is above 10%, the national regulatory authority provides justification for such result in the decision.

5.1. Formation of target revenue with supervision fee

Elering has pointed out in the application that the target revenue with the supervision fee¹¹ for the tariff period is the amount of target revenue and supervision fee considered justified in Competition Authority's decision No 7-3/2023-120 of 01.09.2023 on the approval of network service prices (hereinafter the Competition Authority's decision). Therefore, the Competition Authority has prepared Table 5 to show the difference between the target revenue set out in the Competition Authority's decision and the target revenue calculated on the basis of updated data.

Table 5. The target revenue set out in the Competition Authority's decision and the target revenue calculated on the basis of updated data¹²

	Ühik	Decision of the Competition Authority	Updated data	Difference between the indicators in columns 1 and 2 (column 2 compared with column 1)
		1	2	3
Variable costs	Thousand €	4,687.21	3,929.84 ¹³	-16.2%
Operating costs	Thousand €	9,527.40	9,527.40	0.0%
Depreciation of fixed assets	Thousand €	7,338.95	8,560.55 ¹⁴	16.6%

¹¹ The supervision fee is calculated based on provisions set out in subsection 1 (2¹) of the NGA and 53¹ of the Competition Act. An undertaking pays a supervision fee on the grounds and in accordance with the rules provided by the Competition Act (subsection 1 (2¹) of the NGA). Undertakings whose prices and fees of services are approved by the Competition Authority shall pay the supervision fee according to the sales revenue indicated in an administrative act issued in respect of each network area or licensed territory at the rate of the supervision fee provided for in § 53² of the Competition Act (subsection 53¹ (4) of the Competition Act). The aforementioned undertaking is considered, inter alia, to be a network operator within the meaning of the NGA, and is obliged to obtain approval for the price of the network service (subsection 53¹ (5) of the Competition Act). The rate of the supervision fee for an undertaking with the financing obligation specified in subsection 53¹ (5) of the Competition Act shall be 0.2 per cent of the sales revenue indicated in the administrative act issued to the undertaking (subsection 53² (1) of the Competition Act).

¹² Table 5 has been prepared on the basis of the data provided in the MS Excel tables, which contain numbers more accurately than those reflected in this consultation document. Therefore, the result obtained with a calculator may differ slightly from the numbers shown in the table.

¹³ Updated due to the decrease in the purchase price of gas and electricity related to the operation of the network.

¹⁴ Updated due to taking into account the investments related to the provision of network services made by Elering in 2023–2025 and forecast for 2026 and 2027.

		Decision of the Competition Authority	Updated data	Difference between the indicators in columns 1 and 2 (column 2 compared with column 1
	Ühik	1	2	3
Return of justified profit	Thousand €	9,185.82	8,887.28 ¹⁵	-3.2%
Transmission services revenue	Thousand €	30,739.39	30,905.08	0.5%
Non-transmission services revenue	Thousand €	0.00	0.00	0.0%
Target revenue	Thousand €	30,739.39	30,905.08	0.5%
Supervision fee	Thousand €	61.48	61.81	0.5%
Target revenue with supervision fee	Thousand €	30,800.86	30,966.89	0.5%
<i>incl. revenues generated by capacity-based entry prices for intra-system network use (intra-system entry revenue)</i>	<i>Thousand €</i>	<i>2,592.13</i>	<i>/.../¹⁶</i>	<i>/.../</i>
<i>incl. revenues generated by capacity-based exit prices for cross-system network use (cross-system exit revenue)</i>	<i>Thousand €</i>	<i>0.00</i>	<i>0.00</i>	<i>0.0%</i>
<i>incl. compensation for the purchase costs of electricity necessary for the operation of the Paldiski and Puiatu compressors (compensation for the direct variable cost of compressors), which is paid to Elering by the Finland and Latvia transmission system operators on the basis of the contract for the compensation of transit flows between the system operators (ITC contract)</i>	<i>Thousand €</i>	<i>3,113.59</i>	<i>2,864.71¹⁷</i>	<i>-8.0%</i>
<i>incl. revenues generated by capacity-based exit prices for intra-system network use (intra-system exit revenue)</i>	<i>Thousand €</i>	<i>25,095.14</i>	<i>/.../</i>	<i>/.../</i>

Table 5 shows that the target revenue and supervision fee accepted in the decision of the Competition Authority in the amount of 30,800.86 thousand euros does in essence not differ from the amount of target revenue and supervision fee calculated on the basis of updated data (30,966.89 thousand euros).

Intra-system entry revenue formed under the Agreement on the Implementation of Inter-transmission System Operator Compensation Mechanism (ITC Agreement) (hereinafter: ITC Agreement) concluded on 14 February 2019 between Estonian, Latvian and Finnish transmission system operators Elering AS, AS "Conexus Baltic Grid" and Gasum Oy.

There is no cross-system exit revenue, as from 1 June 2025 Estonia has no cross-system interconnection points. As of that date, the Narva and Värskä entry/exit points were removed from the gas entry-exit system and Luhamaa was converted into a transit point due to the ban

¹⁵ Updated due to taking into account the investments related to the provision of network services made by Elering in 2023–2025 and forecast for 2026 and 2027.

¹⁶ Business secret – revenue forecast for the tariff period based on the revenue actually received during the period from 1 April 2025 to 31 March 2026.

¹⁷ Updated due to the decrease in the purchase price of electricity.

on imports of Russian gas. The changes made were approved by Competition Authority decision No 7-29/2025-001 of 30 May 2025.

The compensation for the direct variable cost of compressors is based on the ITC Agreement. Compressors are mainly necessary for the cross-border trade of neighbouring countries (Finland and Latvia) (to enable gas flows between neighbouring countries). Therefore, the purchase costs of electricity necessary for the operation of the Paldiski and Puiatu compressors will be compensated to Elering by the transmission system operators of neighbouring countries (Gasum Oy – the Finnish transmission system operator and AS "Conexus Baltic Grid" – the Latvian transmission system operator). This means that all the aforementioned costs will be fully compensated to Elering according to the amount of the actual costs and therefore the mentioned costs will not be included in the prices of the TSO's network service.

Intra-system exit revenue is obtained by subtracting the intra-system entry revenue, the cross-system exit revenue and the compensation of the direct variable cost of compressors from the target revenue together with the supervision fee.

5.2. Cost allocation assessments

The cost allocation assessments indicate the degree of cross-subsidisation between intra-system and cross-system network use based on the proposed reference price methodology (Article 5(2) of Regulation 2017/460).

Elering's costs for intra-system and cross-system network use (without the costs of purchasing electricity necessary for the operation of compressors, which are not included in the prices of the network service of the TSO) are divided according to Table 6.

Table 6. Division of the costs of intra-system and cross-system network use (without the costs of purchasing electricity necessary for the operation of compressors)

	Unit	Tariff period
$Revenue_{cap}^{intra}$	Thousand €	27,687.27
$Driver_{cap}^{intra}$	MWh/day	147,365
$Ratio_{cap}^{intra}$	€/MWh/day	187.88
$Revenue_{cap}^{cross}$	Thousand €	0.00
$Driver_{cap}^{cross}$	MWh/day	0.00
$Ratio_{cap}^{cross}$	€/MWh/day	x ¹⁸
$Comp_{cap}$	%	x

Where the results of the capacity index ($Comp_{cap}$) exceeds 10%, the national regulatory authority must provide the justification for such results (Article 5(6) of Regulation 2017/460).

Table 6 shows that during the tariff period, all revenue is derived from intra-system network use according to the forecast. There is no cross-system network use, as from 1 June 2025 Estonia has no cross-system interconnection points. As of that date, the Narva and Värskä entry/exit points were removed from the gas entry-exit system and Luhamaa was converted into a transit point due to the ban on imports of Russian gas. The changes made were approved by Competition Authority decision No 7-29/2025-001 of 30 May 2025.

¹⁸ It is not possible to calculate the indicators marked 'x', since there is no cross-system network use.

5.3. Revenue allocation assessments

The decision of the national regulatory authority (the Competition Authority) to approve the prices of the gas transmission network service must contain, inter alia, the following information (the combined effect of Articles 27(4) and 26(1) of Regulation 2017/460):

- a) capacity-commodity split, meaning the breakdown between the revenue from capacity-based transmission tariffs and the revenue from commodity-based transmission tariffs;
- b) entry-exit split, meaning the breakdown between the revenue from capacity-based transmission tariffs at all entry points and the revenue from capacity-based transmission tariffs at all exit points;
- c) intra-system/cross-system split, meaning the breakdown between the revenue from intra-system network use at both entry points and exit points and the revenue from cross-system network use at both entry points and exit points calculated as set out in Article 5.

Capacity-commodity revenue split – the application indicate that Elering will not apply commodity-based tariffs during the tariff period. All revenues related to the transmission service will be derived from capacity-based tariffs. **Accordingly, the transmission service revenue share derived by Elering from capacity-based tariffs during the tariff period will be 100%, which is in accordance with Article 4(3) of Regulation 2017/460 (transmission services revenue is recovered by capacity-based transmission tariffs).**

The entry-exit revenue split – the shares of revenues from the capacity-based transmission tariffs for the entry points and exit points will be respectively 9% [revenue from capacity-based transmission tariffs for the entry points 2,592.13 thousand € / (revenue from capacity-based transmission tariffs for the entry points 2,592.13 thousand € + revenue from capacity-based transmission tariffs for the exit points 25,095.14 thousand €) × 100% = 9%] and 91% [revenue from capacity-based transmission tariffs for the exit points 25,095.14 thousand € / (revenue from capacity-based transmission tariffs for entry points 2,592.13 thousand € + revenue from capacity-based transmission tariffs for exit points 25,095.14 thousand €) × 100% = 91%].

The low share of revenue from capacity-based transmission tariffs for entry points is due to the joint decision of Finland, Estonian and Latvia regulators to implement an entry price for the supply of gas to the system, which would not be significantly higher than the entry prices used in other EU countries. Consequently, the average entry price of the annual capacity product of the European Union countries (excluding the Baltic States and Finland) according to the benchmarking study was taken as the basis, corrected for statistical inaccuracy (added standard error)¹⁹. The reasons for the conclusion are as follows:

- the entry reference price was designed to take into account the broader objective of accession to the European Union's single gas market;
- gives a price signal to suppliers that ensures the compatibility of the competitive environment even after the end of the isolated market position;
- enables trade relations with the continental European market via forward swaps;
- the low entry reference price gives third parties the incentive to participate in the FinEstLat gas market.

¹⁹ Adjustments to the application of the reference price methodology to all entry and exit points may be made, inter alia, by benchmarking by the national regulatory authority, whereby reference prices at a given entry or exit point are adjusted so that the resulting values meet the competitive level of reference prices (Article 6(4)(a) of Regulation 2017/460).

The average entry price of an annual European Union capacity product in 2018 was 128.44 €/MWh/day per year and the standard error for this average calculation was 14.33 €/MWh/day per year. On this basis, the reference price for the capacity-based entry prices for intra-system network use was set at 142.77 €/MWh/day per year, which remains applicable also during the tariff period.

Intra-system/cross-system revenue split – the shares of revenue generated by intra-system and cross-system network use at both the entry and exit points will be respectively 100% [revenue from intra-system network use at both entry and exit points 27,687.27 thousand € / (revenue from intra-system network use at both entry and exit points 27,687.27 thousand € + revenue from cross-system network use at both entry and exit points 0 thousand €) × 100% = 100%] and 0% [revenue from cross-system network use at both entry and exit points 0 thousand € / (revenue from intra-system network use at both entry and exit points 27,687.27 thousand € + revenue from cross-system network use at both entry and exit points 0 thousand €) × 100% = 0%].

Considering that Estonian, Latvia and Finland are operating as a common market area (FinEstLat) since 2020, where there are no interstate tariffs and there are no cross-system interconnection points with Russia from 1 June 2025 (see section 5.2 of the consultation document), no revenue is generated at the entry or exit points in cross-system network use.

6. NETWORK SERVICE PRICES, MULTIPLIERS AND SEASONAL FACTORS

According to Regulation 2017/460, transmission network prices are based on the reference price, which is the price for a capacity product for firm capacity with a duration of one year, which is applicable at entry and exit points and which is used to set other capacity-based transmission tariffs (quarterly, monthly, daily and intraday transmission tariffs). According to Article 4 of Regulation 2017/460, transmission service revenues are collected from capacity-dependent transmission tariffs, exceptionally, with the approval of the national regulatory authority, a share of the revenues from transmission services may be collected in the form of commodity-based transmission tariffs (clause 3 of the methodology).

Pursuant to subsection 23 (4) of the NGA and Regulation 2017/460, a price cap regime is applied in Estonia in which the transmission system operator's target revenue and the expected available capacity/flows are used to calculate the prices of network services of the transmission system (clause 1 and 3 of the methodology).

Reference prices (T) are formed according to the following formulas²⁰ (section 5.7 of the methodology):

$$T_{sisend-cap}^{intra} = \frac{R_{sisend-cap}^{intra}}{CAP_{sisend}^{intra}} \left[\frac{\text{€}}{\text{MWh}} \text{ per year} \right]$$

$$T_{väljund-cap}^{intra} = \frac{R_{väljund-cap}^{intra}}{CAP_{väljund}^{intra}} \left[\frac{\text{€}}{\text{MWh}} \text{ per year} \right]$$

²⁰ As Elering does not wish to apply commodity-based transmission tariffs, the formulas for the formation of commodity-based reference prices are not set out in this consultation document.

$$T_{sisend-cap}^{cross} = \frac{R_{sisend-cap}^{cross}}{CAP_{sisend}^{cross}} \left[\frac{\text{€}}{MWh} \text{ per year} \right]$$

$$T_{väljund-cap}^{cross} = \frac{R_{väljund-cap}^{cross}}{CAP_{väljund}^{cross}} \left[\frac{\text{€}}{MWh} \text{ per year} \right]$$

where:

- CAP_{sisend}^{intra} - the forecasted contracted capacity of intra-system network use at a specific entry point or a cluster of entry points;
- $CAP_{väljund}^{intra}$ - the forecasted contracted capacity of intra-system network use at a specific exit point or a cluster of exit points;
- CAP_{sisend}^{cross} - the forecasted contracted capacity of cross-system network use at a specific entry point or a cluster of entry points;
- $CAP_{väljund}^{cross}$ - the forecasted contracted capacity of cross-system network use at a specific exit point or a cluster of exit points;

The reserve price of the annual capacity product is equal to the reference price. The calculation of the reserve price for capacity products for a non-annual period is carried out using the following formula (section 5.8 of the methodology):

$$RP_y^x = \frac{T_y^x}{DY} \times D \times M \times H \left[\frac{\text{€}}{MWh} \text{ per period} \right],$$

where:

- RP_y^x - the reserve price of the service (intra-system or cross-system (x) and entry and exit service (y)) for the period (quarter, month, day).
The reserve price of the annual capacity product is equal to the reference price;
- T_y^x - the reference price of the service (intra-system or cross-system (x) and entry and exit service (y));
- DY - the number of days in a year (normally 365, excluding leap years with 366);
- D - the duration of the period (quarter, month, day) in gas days;
- M - capacity product multiplier. For quarterly standard capacity products and for monthly standard capacity products, the level of the multiplier shall be no less than 1 and no more than 1.5.
For daily standard capacity products, the level of the multiplier shall be no less than 1 and no more than 3.
- H - seasonal factor. Seasonal factors are calculated in accordance with the principles set out in Article 15 of Regulation 2017/460.

When verifying the target revenue, the target revenue defined in section 5.3 of the methodology must correspond to the target revenue received according to the following formula (section 5.9 of the methodology):

$$R_S = Revenue_{cap}^{intra} + Revenue_{cap}^{cross} + R_{ms} = T_{sisend-cap}^{intra} \times CAP_{sisend}^{intra} + T_{väljund-cap}^{intra} \times CAP_{väljund}^{intra} + T_{sisend-cap}^{cross} \times CAP_{sisend}^{cross} + T_{väljund-cap}^{cross} \times CAP_{väljund}^{cross} + R_{ms}$$

Multiplier means the factor applied to the respective proportion of the reference price in order to calculate the reserve price for a non-yearly standard capacity product (Article 3(16) of Regulation 2017/460). The level of multipliers shall fall within the following ranges (Article 13(1) of Regulation 2017/460):

- a) for quarterly standard capacity products and for monthly standard capacity products, the level of the respective multiplier shall be no less than 1 and no more than 1,5;
- b) for daily standard capacity products and for within-day standard capacity products, the level of the respective multiplier shall be no less than 1 and no more than 3. In duly justified cases, the level of the respective multipliers may be less than 1, but higher than 0, or higher than 3.

Seasonal factor means the factor reflecting the variation of demand within the year which may be applied in combination with the relevant multiplier (Article 3(21) of Regulation 2017/460). Where seasonal factors are applied, the arithmetic mean over the gas year of the product of the multiplier applicable for the respective standard capacity product and the relevant seasonal factors shall be within the same range as for the level of the respective multipliers set out in paragraph 1 (Article 13(2) of Regulation 2017/460).

Elering's prices for network services, multipliers and seasonal factors

Elering seeks approval of the reference price of **170.29 €/MWh/day per year** as the capacity-based exit price for intra-system network use. This price is obtained by dividing the forecasted intra-system exit revenue for the tariff period, amounting to 25,095.14 thousand euros, by the network usage capacity calculated for the tariff period, 147,365 MWh/day per year (25,095.14 thousand euros / 147,365 MWh/day per year × 1000 = 170.29 €/MWh/day per year).

Other prices and multipliers of the network service will not be changed, and the use of seasonal factors are still not applied for. The reference price for the capacity-based entry prices for intra-system network use remains **142.77 €/MWh/day per year**, corresponding to the reference price jointly applied in Finland, Estonia and Latvia.

With regard to the use of **capacity product multipliers**, Estonian, Latvia and Finland transmission system operators have agreed that in Estonia, Latvia and Finland, the multipliers for the capacity products as specified in Table 7 are used.

Table 7. Multipliers for capacity products agreed between Estonian, Latvia and Finland transmission system operators

Capacity product	Capacity product multiplier
Annual	1
Quarterly	1,1
Monthly	1,25
Daily	1,5
Intradaily	1,7

The multipliers for capacity products are designed to provide the fairest and most balanced cost allocation between the different network users, ie between network users with a homogeneous consumption profile and an uneven consumption profile. The purpose of the capacity product multipliers is to give cost-based signals by incentivising consistent consumption and long-term capacity booking, which corresponds more closely to the actual costs of

the transmission network. Capacity product multipliers have an impact on the operational planning of the gas system by system operators and contribute to the emergence of a more predictable operational environment for system operators, which was particularly necessary for the launch of the single gas market area.

Pursuant to Article 13(1) of Regulation 2017/460, for quarterly standard capacity products and for monthly standard capacity products, the level of the respective multiplier shall be no less than 1 and no more than 1,5; for daily standard capacity products and for within-day standard capacity products, the level of the respective multiplier shall be no less than 1 and no more than 3. Therefore, it follows from the above that Elering's capacity product multipliers comply with Article 13(1) of Regulation 2017/460.

The system operators do not apply **seasonal factors** (the value of the seasonal factor is 1).

7. DIFFERENCE BETWEEN THE TRANSMISSION TARIFFS TO BE APPROVED AND THE TRANSMISSION TARIFFS CURRENTLY IN EFFECT AND THE ONES ESTIMATED FOR SUBSEQUENT TARIFF PERIODS

The decision of the national regulatory authority (the Competition Authority) to approve the prices of the gas transmission network service must contain, inter alia, the following information (the combined effect of Articles 27(4) and 26(1) of Regulation 2017/460):

- a) the difference in the level of transmission tariffs for the same type of transmission service applicable for the prevailing tariff period and for the tariff period for which the information is published;
- b) the estimated difference in the level of transmission tariffs for the same type of transmission service applicable for the tariff period for which the information is published and for each tariff period within the remainder of the regulatory period.
- c) at least a simplified tariff model, updated regularly, accompanied by the explanation of how to use it, enabling network users to calculate the transmission tariffs applicable for the prevailing tariff period and to estimate their possible evolution beyond such tariff period.

The difference in the level of transmission tariffs for the same type of transmission service applicable for the prevailing tariff period and for the tariff period for which the information is published is shown in Tables 8, 8a and 8b below.

Table 8. Difference between capacity-based entry prices for intra-system network use in the current tariff period and the tariff period for which the information is published

	Intra-system network use		
	Capacity-based entry price in the current tariff period, €/MWh/day per period	Capacity-based entry price in the tariff period for which the information is published, €/MWh/day per period	Change of capacity-based entry price
Reference price	142.77	142.77	0.0%
Annual reserve price	142.77	142.77	0.0%
quarter (Oct to Dec)	39.58	39.58	0.0%
quarter (Jan to March)	38.72	38.72	0.0%
quarter (April to June)	39.15	39.15	0.0%
quarter (July to Sept)	39.58	39.58	0.0%

	Intra-system network use		
	Capacity-based entry price in the current tariff period, €/MWh/day per period	Capacity-based entry price in the tariff period for which the information is published, €/MWh/day per period	Change of capacity-based entry price
October	15.16	15.16	0.0%
November	14.67	14.67	0.0%
December	15.16	15.16	0.0%
January	15.16	15.16	0.0%
February	13.69	13.69	0.0%
March	15.16	15.16	0.0%
April	14.67	14.67	0.0%
May	15.16	15.16	0.0%
June	14.67	14.67	0.0%
July	15.16	15.16	0.0%
August	15.16	15.16	0.0%
September	14.67	14.67	0.0%
Day	0.59	0.59	0.0%
Intradaily	0.66	0.66	0.0%

Table 8a. Difference between capacity-based exit prices for intra-system network use in the current tariff period and the tariff period for which the information is published

	Intra-system network use		
	Capacity-based exit price in the current tariff period, €/MWh/day per period	Capacity-based exit price in the tariff period for which the information is published, €/MWh/day per period	Change of capacity-based exit price
Reference price	2,766.87	170.29	-93.8%
Annual reserve price	Not implemented	170.29	x
quarter (Oct to Dec)	Not implemented	Not implemented	x
quarter (Jan to March)	Not implemented	Not implemented	x
quarter (April to June)	Not implemented	Not implemented	x
quarter (July to Sept)	Not implemented	Not implemented	x
October	Not implemented	Not implemented	x
November	Not implemented	Not implemented	x
December	Not implemented	Not implemented	x
January	Not implemented	Not implemented	x
February	Not implemented	Not implemented	x
March	Not implemented	Not implemented	x
April	Not implemented	Not implemented	x
May	Not implemented	Not implemented	x
June	Not implemented	Not implemented	x
July	Not implemented	Not implemented	x
August	Not implemented	Not implemented	x
September	Not implemented	Not implemented	x
Day	7.56	Not implemented	x
Intradaily	7.56	Not implemented	x

Table 8b. Difference between capacity-based entry and exit prices for cross-system network use in the current tariff period and the tariff period for which the information is published

	Cross-system network use		
	Capacity-based entry and exit price in the current tariff period, €/MWh/day per period	Capacity-based entry and exit price in the tariff period for which the information is published, €/MWh/day per period	Change of capacity-based entry and exit price
Reference price	142.77	142.77	0.0%
Annual reserve price	142.77	142.77	0.0%
quarter (Oct to Dec)	39.58	39.58	0.0%
quarter (Jan to March)	38.72	38.72	0.0%
quarter (April to June)	39.15	39.15	0.0%
quarter (July to Sept)	39.58	39.58	0.0%
October	15.16	15.16	0.0%
November	14.67	14.67	0.0%
December	15.16	15.16	0.0%
January	15.16	15.16	0.0%
February	13.69	13.69	0.0%
March	15.16	15.16	0.0%
April	14.67	14.67	0.0%
May	15.16	15.16	0.0%
June	14.67	14.67	0.0%
July	15.16	15.16	0.0%
August	15.16	15.16	0.0%
September	14.67	14.67	0.0%
Day	0.59	0.59	0.0%
Intradaily	0.66	0.66	0.0%

The estimated differences in the level of transmission tariffs for the same type of transmission service applicable for the tariff period for which the information is published and for each tariff period within the remainder of the regulatory period, as well as the simplified tariff formation model are provided in Annex 2 to the consultation document.

8. CONSULTATION REQUIREMENTS

One or more consultations with regard to the reference price methodology must be carried out by the national regulatory authority or the transmission system operator, as decided by the national regulatory authority²¹, in accordance with Article 26 (the combined effect of Articles 26(1) and 27(5) of Regulation 2017/460). Upon launching the final consultation pursuant to Article 26 prior to the decision referred to in Article 27(4), the national regulatory authority or the transmission system operator(s), as decided by the national regulatory authority, shall forward the consultation documents to the Agency (ACER)²² (Article 27(1) of Regulation 2017/460). Within two months following the end of the consultation referred to in Article 27(1), the Agency shall publish and send to the national regulatory authority or transmission system operator, depending on which entity published the consultation document, and the Commission the conclusion of its analysis in accordance with Article 27(2) in English (Article 27(3) of Regulation 2017/460).

²¹ ‘Reference price methodology’ means the methodology applied to the part of the transmission services revenue to be recovered from capacity-based transmission tariffs with the aim of deriving reference prices (Article 3(2) of Regulation 2017/460);

²² Agency for the Cooperation of Energy Regulators

Therefore, the Competition Authority will also forward this consultation document to ACER for consultation.

9. SUMMARY

The price of network services has to be established such that it ensures (subsection 23(3) of the NGA):

- 1) coverage of the necessary operating expenses;
- 2) the making of investments to ensure security of supply and to fulfil operational and development obligations;
- 2¹) investments to ensure continuity of a vital service;
- 3) compliance with environmental requirements;
- 4) compliance with quality and safety requirements;
- 5) a justified return on the capital invested by the undertaking;
- 6) the price of the network service must cover the justified costs of purchasing the gas used to provide that network service.

The expenses included in the price must be justified, and must be based on cost efficiency and allow the undertaking to carry out the duties prescribed by law (subsection 23² (3) of the NGA).

The decision of the national regulatory authority (the Competition Authority) must include the following information (the combined effect of Articles 27(4) and 26(1) of Regulation 2017/460):

- a) the description of the proposed reference price methodology as well as the following items:
 - i) the indicative information set out in Article 30(1)(a), including:
 - 1) the justification of the parameters used that are related to the technical characteristics of the system;
 - 2) the corresponding information on the respective values of such parameters and the assumptions applied;
 - ii) the value of the proposed adjustments for capacity-based transmission tariffs pursuant to Article 9;
 - iii) the indicative reference prices subject to consultation;
 - iv) the results, the components and the details of these components for the cost allocation assessments set out in Article 5;
 - v) the assessment of the proposed reference price methodology in accordance with Article 7;
 - vi) where the proposed reference price methodology is other than the capacity weighted distance reference price methodology detailed in Article 8, its comparison against the latter accompanied by the information set out in point (iii);
- b) the indicative information set out in Article 30(1)(b)(i), (iv), (v);
- c) the following information on transmission and non-transmission tariffs:
 - i) where commodity-based transmission tariffs referred to in Article 4(3) are proposed:
 - 1) the manner in which they are set;

- 2) the share of the allowed or target revenue forecasted to be recovered from such tariffs;
- 3) the indicative commodity-based transmission tariffs;
- ii) where non-transmission services provided to network users are proposed:
 - 1) the non-transmission service tariff methodology therefor;
 - 2) the share of the allowed or target revenue forecasted to be recovered from such tariffs;
 - 3) the manner in which the associated non-transmission services revenue is reconciled as referred to in Article 17(3);
 - 4) the indicative non-transmission tariffs for non-transmission services provided to network users;
- d) the indicative information set out in Article 30(2);
- e) where the fixed payable price approach referred to in Article 24(b) is considered to be offered under a price cap regime for existing capacity:
 - i) the proposed index;
 - ii) the proposed calculation and how the revenue derived from the risk premium is used;
 - iii) at which interconnection point(s) and for which tariff period(s) such approach is proposed;
 - iv) the process of offering capacity at an interconnection point where both fixed and floating payable price approaches referred to in Article 24 are proposed.

The above has been addressed in this consultation document as follows:

- a) the description of the proposed reference price methodology (clause 4.1);
- b) the indicative information set out in Article 30(1)(a) (clauses 4.3, 4.4 and 4.5);
- c) there are no proposed adjustments for capacity-based transmission tariffs pursuant to Article 9 since Elering does not adjust the transmission tariffs;
- d) the indicative reference prices subject to consultation (clause 6, p 26);
- e) the results and details of the components for the cost allocation assessments set out in Article 5 (clause 5.2);
- f) the assessment of the proposed reference price methodology in accordance with Article 7 (clause 4.1);
- g) where the proposed reference price methodology is other than the capacity weighted distance reference price methodology detailed in Article 8, its comparison against the latter accompanied by the information set out in point (iii) (clause 4.2);
- h) the indicative information set out in Article 30(1)(b)(i), (iv), (v) (clauses 5.1 and 5.3);
- i) information on commodity-based transmission tariffs is not applicable as Elering does not apply such transmission tariffs;
- j) information on non-transmission services is not applicable as Elering does not plan to apply non-transmission services to network users;
- k) the indicative information set out in Article 30(2) (clause 7 and Annex 2);
- l) information if the fixed payable price approach referred to in Article 24(b) is considered to be offered under a price cap regime for existing capacity is not applicable as Elering is not considering to offer a fixed payable price approach under a price cap regime for existing capacity.