

# ACER Consultation Template

Fields marked with \* are mandatory.

## Introduction

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The Agency for the Cooperation of Energy Regulators ('the Agency') has developed an online template following Article 26(5) of the Commission Regulation (EU) 2017/460 of 16 March 2017 establishing a Network Code on Harmonised Transmission Tariff Structures for Gas ('TAR NC'). The online template has been designed for the NRA/TSO responsible for carrying out the consultation on the reference price methodology to provide a summary of the consultation.

The online template and the tool for the submission of files to the Agency is implemented over a secure IT connection based on https.

Instructions for using the online template and for the submission of the consultation documents are on the appendix, at the end of the online template. For additional information on the online template, visit: [http://www.acer.europa.eu/Official\\_documents/Public\\_consultations/Pages/ACER-Consultation-Template.-Tariff-NC-Article-26\(5\).aspx](http://www.acer.europa.eu/Official_documents/Public_consultations/Pages/ACER-Consultation-Template.-Tariff-NC-Article-26(5).aspx)

## General information on the consultation on the RPM

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\* Member state

Finland

Organisation responsible for the consultation on the RPM.

Gasgrid Finland - Finnish TSO

Contact point in the NRA/TSO responsible for the consultation.

[REDACTED]

Timeline for the final consultation: launch and closing dates.

16th of April, 2025. - 16th of June, 2025

Will there be any intermediate consultations prior to the final consultation? If so, what topics will they cover?  
The last section of the survey allows the NRA/TSO providing information on this part of the process.

No

Are any intermediate consultations planned/expected prior to the final consultation on the RPM?

- ☐ Yes  
☐ To be decided  
☒ No

## A. Proposed reference price methodology [Article 26 (1)(a)]

### A.1. Information on the parameters used in the proposed RPM related to technical characteristics of the transmission system [Articles 26(1)(a)(i), 30.(1)(a)].

Provide the information on the parameters listed in Article 30(1)(a)(i-v) when they are an input to the proposed RPM . For parameters that are not an input to the RPM, mark as 'Not applicable'.

The description of the RPM and the justification of the parameters may refer to information requested in other points of Article 26 and in other articles, such as Article 7.

#### A.1.A. Description of the proposed reference price methodology [Article 26(1)(a)].

The following description is intended to provide an overview of the RPM. Include a reference to, at least, the following elements. Only refer to these items if they are applicable to the RPM:

- Choice of RPM
- Cost drivers of the RPM
- Locational signals in E/E points resulting of the RPM (e.g.: capacity, distance). Locational signals are price levels that send incentives to network users in order for the network operators to achieve an efficient operation and/or expansion of the gas system.
- Entry/exit split. Cost reflectivity and application to the RPM.
- Capacity/commodity split. Cost reflectivity and application to the RPM.
- Intra-system/cross-system split. Cost reflectivity and application to the RPM.
- Adjustments (benchmarking, equalisation and rescaling).
- Use of inter-TSO compensation mechanism. Brief note on the application of the RPM in multi-TSO E /E system and reference to the inter-TSO compensation mechanism consultation.

Indicate the choice of RPM (e.g.: postage stamp, capacity weighted distance, virtual point, matrix, or other)

Postage stamp with ITC agreement

Provide description.

The postage stamp methodology foresees the same reference price at all entries and the same reference price at all exits. The required inputs are the allowed revenue and the assumptions on capacity bookings. The reference price for each category of points is given by the targeted revenue for entry (respectively exit) divided by the total booked capacity, which is assumed for entry points (respectively exit points). Because Finland is part of common entry tariff zone with Estonia and Latvia, postage stamp calculation is done for few cases to illustrate the influence of Inter-TSO-Compensation agreement to the reference prices and compare the reference prices derived from CWD and postage stamp methodologies.

Reference to consultation document(s). Provide document ID and relevant page(s).

Periodic Consultation of tariff methodology, chapter 8, pages 30-35

#### A.1.B. Justification of the parameters and how they are used in the RPM [Articles 26(1)(a)(i), 30(1)(a)(i-v)].

Justify the selection and use of the parameters listed in Article 30(1)(a)(i-v) that are and input to the RPM, in view of the level of complexity of the transmission network related to the technical characteristics of the transmission system.

Reference to consultation document(s). Provide document ID and relevant page(s).

Periodic Consultation of tariff methodology:  
30(1)(a)(i): chapter 7.2. pages 20-23  
30(1)(a)(ii) and (iii): chapter 7.5. pages 27-29  
30(1)(a)(iv) and (v): chapter 3. pages 8-10

#### A.1.C. Technical capacity at entry and exit points: values and associated assumptions [Articles 26(1)(a)(i), 30(1)(a)(i)].

Is the parameter an input to the RPM?

- ☐ Yes  
☒ No

#### A.1.D. Forecasted contracted capacity at entry and exit points: values and associated assumptions [Articles 26(1)(a)(i), 30(1)(a)(ii)].

Is the parameter an input to the RPM?

- ☒ Yes  
☐ No

Values of the forecasted contracted capacity at entry and exit points. Reference to consultation document (s). Provide document ID and relevant page(s).

Periodic Consultation of tariff methodology: chapter 6, pages 17-18 and chapter 7.5 page 28

Associated assumptions for the values of the forecasted contracted capacity at entry and exit points. Reference to consultation document(s). Provide document ID and relevant page(s).

Periodic Consultation of tariff methodology: chapter 6, pages 17-18 and chapter 7.5 page 28

#### A.1.E. The quantity and the direction of the gas flow for entry and exit points: values and associated assumptions [Articles 26(1)(a)(i), 30(1)(a)(iii)].

Is the parameter an input to the RPM?

- ☐ Yes  
☒ No

#### A.1.F. Structural representation of the transmission network with an appropriate level of detail and associated assumptions [Articles 26(1)(a)(i), 30(1)(a)(iv)].

The representation should include an image of a simplified network depicting the transmission network and distinguishing the elements defined in Article 2(1)(1) of the Regulation (EC) No. 715/2009:

- High-pressure pipelines (other than the upstream pipeline network and other than high-pressure pipelines primarily used in the context of local distribution of natural gas, with a view to its delivery).
- Transmission networks which are dedicated to supply in domestic customers.
- TSO-DSO interface (transmission exit points to DSO).

The representation should include the transmission network elements included in the regulatory asset base.

Reference to consultation document(s). Provide document ID and relevant page(s).

Periodic Consultation of tariff methodology: chapter 3, pages 8-9

Associated assumptions and criteria used for the structural representations (e.g.: clustering, average distances, etc).

Provide reference to consultation document(s):

Periodic Consultation of tariff methodology: chapters 7.2 and 7.3, pages 20-26

#### A.1.G. Additional technical information and associated assumptions about the transmission network such as the length of pipelines, the diameter of pipelines and the power of compressor stations [Articles 26(1)(a)(i), 30(1)(a)(v)].

Are there other parameter used as input to the RPM related to technical characteristics of the transmission system? Provide pipeline pressure levels if available.

- ☐ Yes  
☒ No

## **A.2. The value of the proposed adjustments for capacity-based transmission tariffs pursuant to Article 9 [Article 26(1)(a)(ii)]**

### **A.2.A. Proposed discount(s) at entry points from and exit points to storage facilities [Articles 26(1)(a)(ii), 9(1)].**

Do you apply the discount(s) at entry points from and/or exit points to storage facilities?

- ☐ Yes  
☒ No

Are there storage facilities connected to more than one transmission or distribution network system.

- ☐ Yes  
☒ No

### **A.2.B. Proposed discount(s) at entry points from LNG facilities [Articles 26(1)(a)(ii), 9(2)].**

Do you apply the discount(s) at entry points from LNG facilities?

- ☐ Yes  
☒ No

### **A.2.C. Proposed discount(s) at entry points from and exit points to infrastructure developed with the purpose of ending the isolation of Member States [Articles 26(1)(a)(ii), 9(2)].**

Do you apply discount(s) at entry points from and exit points to infrastructure developed with the purpose of ending the isolation of Member States?

- ☐ Yes  
☒ No

## **A.3. Indicative reference prices subject to consultation [Article 26(1)(a)(iii)]**

### **A.3.A. Indicative reference prices at each entry and at each exit point [Article 26(1)(a)(iii)].**

Reference to consultation document(s). Provide document ID and relevant page(s).

Periodic Consultation of tariff methodology: chapter 8.1 pages 31-32 and chapter 17 pages 49-51

## **A.4. Cost allocation assessment [Articles 26(1)(a)(iv), 5]**

According to Article 27(2)(b) the Agency shall assess the compliance of Article 7. Given that Article 7(c) refers to the cost allocation assessment, the Agency's analysis of compliance applies to the cost allocation assessment. For this purpose, the Agency request the NRA/TSO responsible for the consultation to submit a justification of the cost allocation assessment together with the rest of the consultation documentation once the consultation is launched. This only applies for the case when the cost allocation ratio exceeds

10%. This justification is requested by the Agency independently of its inclusion in the NRA motivated decision described in Article 27(4). For the submission of documents relevant to this section, see the upload section at the end of this template.

#### A.4.A. Results of the capacity cost allocation assessment [Articles 26(1)(a)(iv), 5].

Capacity cost allocation comparison index (%)

200

#### A.4.B. Components of the capacity cost allocation assessment [Articles 26(1)(a)(iv), 5].

Reference to consultation document(s). Provide document ID and relevant page(s).

Periodic Consultation of tariff methodology: chapter 15, pages 46-48

#### A.4.C. Details of components of the capacity cost allocation assessment [Articles 26(1)(a)(iv), 5].

Description of the calculation, including:

- Details of the cost drivers following Article 5(1)(a).
- Rationale for the combination of capacity cost drivers.
- Where the result of the capacity cost comparison index exceeds 10%, provide the justification for such results.

Reference to consultation document(s). Provide document ID and relevant page(s).

Periodic Consultation of tariff methodology: chapter 15, pages 46-48

#### A.4.A. Results of the commodity cost allocation assessment [Articles 26(1)(a)(iv), 5].

Commodity cost allocation comparison index (%).

200

#### A.4.B. Components of the commodity cost allocation assessment [Articles 26(1)(a)(iv), 5].

Reference to consultation document(s). Provide document ID and relevant page(s).

Periodic Consultation of tariff methodology: chapter 15.2, page 49

#### A.4.C. Details of components of the commodity cost allocation assessment [Articles 26(1)(a)(iv), 5].

Description of the calculation, including:

- Details of the cost drivers following Article 5(1)(a).
- Rationale for the combination of commodity cost drivers.
- Where the result of the commodity cost comparison index exceeds 10%, provide the justification for such results.

Reference to consultation document(s). Provide document ID and relevant page(s).

Periodic Consultation of tariff methodology: chapter 15.2, page 49

## **A.5. Assessment of the proposed reference price methodology in accordance to Article 7 and Article 13 of the Regulation (EC) No. 715/2009 [Article 26(1)(a) (v)]**

The Agency will evaluate the compliance of the RPM against the set of principles laid out in Article 7 [Article 27(2)(b)(1)]. For the purpose of making explicit the criteria that will be used for this analysis, the template provides the following non-exhaustive list of suggestions to follow in the assessment.

Quantitative analysis and stakeholder support will be taken by the Agency as evidence. When such proofs are not available, compliance will be reviewed based on the explanations provided.

### **A.5.A. The RPM should: enable network users to reproduce the calculation of reference prices and their accurate forecast.**

The description of the RPM, together with the rest of elements listed in this template should be instrumental to allow replicating the calculation of reference prices. Provide the manner and the order in which these elements are used for the calculation of the RPM.

Reference to consultation document(s). Provide document ID and relevant page(s).

Periodic Consultation of tariff methodology: chapter 8.6. pages 35-36

### **A.5.B. The RPM shall into account the actual costs incurred for the provision of transmission services considering the level of complexity of the transmission network.**

Evaluate the cost reflectivity of the RPM related to the level of complexity and the technical characteristics of the transmission network. The assessment can be based on elements such as:

- How do the level of complexity and the technical characteristics of the transmission network influence the choice of RPM?
- Is the use or non-use of locational signals related to the level of complexity and the technical characteristics of the transmission network?
- How does the choice of E/E split affect the cost reflectivity of reference prices?
- How do reference prices at E/E points relate to the underlying costs of the network?
- Indicate any other elements of the RPM relevant to assess the cost reflectivity of the RPM

Reference to consultation document(s). Provide document ID and relevant page(s).

**A.5.C. The RPM shall ensure non-discrimination and shall prevent undue cross-subsidisation including by taking into account the cost allocation assessments set out in Article 5.**

Evidence for the assessment should take into account the cost allocation assessment, which checks the non-discrimination between two predefined groups of network users. Other means can be used to check non-discrimination between other groups of network users. Provide reference to consultation document(s). Provide document ID and relevant page(s).

Periodic Consultation of tariff methodology: chapter 8.6. pages 35-36

**A.5.D. The RPM shall ensure that significant volume risk related particularly to transports across an entry-exit system is not assigned to final customers within that entry-exit system.**

Explain how the variation in transit flows affects reference prices for final consumers. The assessment can be based on elements such as:

- The contribution of the E/E split to the risk bared by final consumers.
- Are there any ex-ante splits of revenues for the purpose of intra-system and cross-system users?

Reference to consultation document(s). Provide document ID and relevant page(s).

Periodic Consultation of tariff methodology: chapter 8.6. pages 35-36

**A.5.E. The RPM shall ensure that the resulting reference prices do not distort cross-border trade.**

Refer at least to the effect of the E/E split on cross-border trade. Provide reference to consultation document(s). Provide document ID and relevant page(s).

Periodic Consultation of tariff methodology: chapter 8.6. pages 35-36

**A.6. Comparison with the CWD methodology [Article 8] accompanied by the indicative reference prices subject to consultation set out in Article 26(1)(a) (iii)**

**A.6.A.** Where the proposed reference price methodology is other than the capacity weighted distance reference price methodology detailed in Article 8, a comparison between both methodologies should be performed [Articles 26(1)(a)(vi), 8].



The comparison should be performed with an appropriate level of detail and should enable stakeholders to identify the main differences, advantages and disadvantages of the compared methodologies. The following non-exhaustive list provides relevant elements that can guide the comparison:

- Differences, if any, in the input parameters for each of the methodologies such as input parameters (e.g.: technical and forecasted capacity), ratios for the allowed or target revenue listed in Article 30(1)(b)(v) and discounts to storage and LNG.
- Differences in the manner in which each of the methodologies reflect the level of complexity and the technical characteristics of the transmission network.
- Relation of each of the methodologies to the principles laid out in Article 7.
- Cost allocation assessment in Article 5.

Provide the same parameters and assumptions used for the CWD as for the proposed RPM, highlighting the differences, if any. When the parameters used for each of the methodologies are different, indicate and follow through the differences in reference prices.

Reference to consultation document(s). Provide document ID and relevant page(s).

Periodic Consultation of tariff methodology: chapter 7, pages 19-29; and chapter 11, pages 43-44

#### A.6.B. Comparison of indicative reference prices at each entry point and at each exit point of the proposed RPM and the CWD detailed in Article 8.

Reference to consultation document(s). Provide document ID and relevant page(s).

Periodic Consultation of tariff methodology: chapter 11 pages 43-44

## B. Allowed or Target Revenue of the TSO [Article 26(1)(b)]

### B.7. Indicative information set out in Article 30(1)(b)(i), (iv) and (v)

#### B.7.A. Allowed or target revenue, or both, of the transmission system operator [Articles 26(1)(b), 30(1)(b)(i)].

- If allowed and target revenue are both used, provide detail for each case.
- In the case of multiple TSOs, indicate the approach adopted. In the case where the NRA is carrying out the consultation, provide the reference where the information on allowed or target revenue for each TSO can be found.
- Units: currency/year

Description.

In Finland the tariff period is a calendar year. The current regulatory period is 2024-2027. Non-price cap regime is applied which means a regulatory regime under which the allowed revenue for Gasgrid Finland is set. The indicative allowed revenue for 2026 is 46.5 M€.

Reference to consultation document(s). Provide document ID and relevant page(s).

Periodic Consultation of tariff methodology: chapter 4.2. page 13

### B.7.B. Transmission services revenue [Articles 26(1)(b), 30(1)(b)(iv)].

Description (Units: currency/year)

Transmission service revenue is collected by transmission charges and commodity charges. In addition, Gasgrid Finland has proposed to amend the transmission service pricing model by introducing new tariff component, namely connection capacity charge which is designed to be based on the connection capacity agreed in the connection agreement between the connecting party (either transmission network end user or distribution system operator) and Gasgrid Finland.

The connection capacity charge would be part of the tariff model for transmission services, and the addition of the connection capacity charge itself would not affect the level of reasonable return on gas transmission, which is still determined according to the Energy Authority's regulatory method.

Indicative transmission services revenue is 94.6 M€, including 68,8 M€ revenue estimated to be collected from transmission capacity charges, 3,8 M€ revenue from commodity charges and 22 M€ collected from proposed connection capacity charge.

Reference to consultation document(s). Provide document ID and relevant page(s).

Periodic Consultation of tariff methodology: chapter 4.2. page 13 and chapter 8.4. pages 33-34

### B.7.C. Capacity-commodity split of the transmission services revenue.

Breakdown between the revenue from capacity-based transmission tariffs and the revenue from commodity-based transmission tariff [Articles 26(1)(b), 30(1)(b)(v)(1)].

Revenue from recovered from capacity-based transmission tariffs, %:

95

Revenue from recovered from commodity-based transmission tariffs, %:

5

Reference to consultation document(s). Provide document ID and relevant page(s).

Periodic Consultation of tariff methodology: chapter 8.4. pages 33-34

### B.7.D. Entry-exit split of the transmission services revenue.

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 [Articles 26(1)(b), 30(1)(b)(v)(2)].

Revenue from capacity-based transmission tariffs at all entry points, %:

9

Revenue from capacity-based transmission tariffs at all exit points, %:

91

Reference to consultation document(s). Provide document ID and relevant page(s).

Periodic Consultation of tariff methodology: chapter 8.4. pages 33-34

#### B.7.E. Intra-system/cross-border split of the transmission services revenue.

Breakdown between the revenue from domestic network users at both entry points and exit points and the revenue from cross-border network users at both entry points and exit points calculated as set out in Article 5, [Articles 26(1)(b), 30(1)(b)(v)(3)]

Revenue from domestic network users at entry points and exit points, %:

100

Revenue from cross-border network users at entry points and exit points, %:

0

Reference to consultation document(s). Provide document ID and relevant page(s).

Periodic Consultation of tariff methodology: chapter 8.4. pages 34

## C. Information on commodity based and non-transmission tariffs [Article 26(1)(c)]

Following Article 27(2), the Agency shall analyse the compliance of the criteria used for setting commodity-based tariffs as set out in Article 4(3), and of the criteria used for setting non-transmission tariffs as set out in Article 4(4). The analysis of compliance will be based on the terms listed in this section.

### C.8. Flow based charge. Information on commodity-based transmission tariffs referred to in Article 4(3) [Article 26(1)(c)(i)]

Do you apply a flow based charge?

- ☒ Yes  
☐ No

#### C.8.A. The manner in which they are set [Articles 26(1)(c)(i)(1), 4(3)(a)].

Provide the following information:

- Description, rationale and extent to which the flow based charge is used.

- Formula with cost drivers for monetary terms / in kind.
- Reference used for the calculation (historical flows, forecasted flows or both).
- Confirm that the flow based charge is set in such a way that it is the same at all entry points and the same at all exit points.

Description:

Commodity tariff is flow-based tariff which is collected from the exit zone. Due to the ITC agreement, compressor costs caused by regional flow (exit through Balticconnector), are compensated via the agreement. The major part of the flow-based costs is caused by the compressor stations – more specifically the compressor units' gas and electricity which is used for the own use. A flow-based charge provides the way of recovering the associated costs from shippers in a cost reflective manner. Transit flow operational costs are covered by the mechanism described in chapter 5.1. of the consultation.

For the year 2026, the target revenue to be collected by commodity tariff is 3.8 M€. With the estimate that domestic gas consumption is 14 TWh, the indicative commodity tariff is 0,00027143 €/kWh.

Reference to consultation document(s). Provide document ID and relevant page(s).

Periodic Consultation of tariff methodology: chapter 13 page 45.

### C.8.B. The share of the allowed or target revenue forecasted to be recovered from such tariffs [Articles 26(1)(c)(i)(2), 4(3)(a)].

Share of transmission service revenue (allowed or target revenue) to be recovered by flow based charges (%)

4

Reference to consultation document(s). Provide document ID and relevant page(s).

Periodic Consultation of tariff methodology: chapter 13 page 45.

### C.8.C. The indicative flow-based charge [Articles 26(1)(c)(i)(3), 4(3)(a)].

Description:

For the year 2026, the target revenue to be collected by commodity tariff is 3.8 M€. With the estimate that domestic gas consumption is 14 TWh, the indicative commodity tariff is 0,00027143 €/kWh.

Reference to consultation document(s). Provide document ID and relevant page(s).

Periodic Consultation of tariff methodology: chapter 13 page 45.

## C.9. Complementary revenue recovery charge: Information on commodity-based transmission tariffs referred to in Article 4(3) [Article 26(1)(c)(i)]

Do you use a complementary revenue recovery charge?

- ☐ Yes  
☒ No

Comments, if relevant.

## C.10. Information on non-transmission services provided to network users [Article 26(1)(c)(ii)]

Are there non-transmission services provided to network users on the bases of a non-transmission service tariff methodology?

- ☒ Yes  
☐ No

### C.10.A. Non-transmission service tariff methodologies [Articles 26(1)(c)(ii)(1), 4(1)].

Provide:

- List of services considered as non-transmission service on the basis of the criteria laid out in Article 4 (1).
- Users to which each of the non-transmission services applies. Indicate if it is not possible to identify the beneficiary of the non-transmission service.
- Explanation of the non-transmission tariff methodology provided per service.

Description:

Non-transmission services revenue means the part of the allowed revenue which is recovered by non-transmission tariffs.

Centralized data exchange charge (=Datahub charge):

Starting from the Finnish gas market opening in 2020, centralized data exchange system, datahub, was introduced in the retail market. Retailers and distribution system operators are carrying out their retail market processes through the datahub. The datahub is operated by Gasgrid Finland. Since the system has a legal monopoly in the provision of its services, the regulation method for pricing of the services was established on 1st of July 2020. Supervision of datahub's operation is entrusted to the Energy Authority.

The DSO is charged with regard to the consumption sites in distribution networks owned or operated by the DSO for which information is maintained in the register of centralized data exchange system (= all daily or non-daily read metering sites in the distribution network except small-scale individual non-daily read sites using gas only for cooking purposes).

Balticconnector underutilization fee

Underutilization fee is applicable in the Balticconnector entry and exit points and it is applied only during

days, when Balticconnector is congested. The principles regarding the underutilization fee are determined in the terms and conditions of Balticconnector. Shippers may renominate downward in the Balticconnector free of charge a maximum of tolerance set by the TSO. The TSO may change the tolerance limit between 10 000 and 50 000 kWh/h, taking into account the operational operating limits of the Finnish natural gas system. The underutilization fee of 0,002 €/kWh is charged to the shipper for the amount exceeding the tolerance limit.

The tolerance is set to the absolute value so that the tolerance gives flexibility for shippers, but does not endanger operational capabilities to operate the transmission system cost-effectively with high security of supply. Absolute value means that shippers transporting smaller quantities have smaller risk to reach the tolerance limit compared to shippers transporting plenty of gas through BC. The absolute value instead of relative value (%-based tolerance for downward renomination) is set, because Balticconnector capacity is an absolute value and small absolute change in the transported gas quantities does not have impact on the physical network operations.

Underutilization fee is set so that the fee provides incentive for shippers to submit nominations close to their actual needs instead of allowing nominate great quantities just in case knowing that downward renominations can be submitted later as the actual need is known more precisely. Upward nominations can be submitted freely in line with Balticconnector rules. On the other hand, defining the value for the fee it is considered that the fee is reasonable and does not cause undue precautions in shippers' operations. The income collected from the underutilization fee is returned for the market and Gasgrid Finland does not collect any profit from this component.

Reference to consultation document(s). Provide document ID and relevant page(s).

Periodic Consultation of tariff methodology: chapter 14 pages 45-46

#### C.10.B. Share of the allowed or target revenue forecasted to be recovered from such tariffs, [Articles 26(1)(c)(ii)(2)]

Share of the allowed or target revenue forecasted to be recovered from non-transmission service tariffs. Provide, if possible, details per type of non-transmission service.

No profit is to be collected by Balticconnector underutilization fee (income is returned back to market by neutrality charge of balancing).

According to the principles of regulation method for datahub service, the target turnover to be collected by datahub charge is 60 000 € in 2026. Gasgrid Finland is entitled to collect regulated profit from datahub service. There are approximately 3 900 delivery points which are subject to the invoice of the datahub charge. The datahub charge for 2025 is 1,29 €/metering point/month.

Reference to consultation document(s). Provide document ID and relevant page(s).

Periodic Consultation of tariff methodology: chapter 14 pages 45-46

#### C.10.C. The manner in which the associated non-transmission services revenue is reconciled as referred to in Article 17(3) [Articles 26(1)(c)(ii)(3), 17(3)].

Provide details about how is the reconciliation done including the use of a regulatory account, the split of regulatory accounts into sub-accounts, and the use of separate accounts.

There is a separate regulation method for the centralized data exchange service, based of which the centralized data exchange charge is determined.

Reference to consultation document(s). Provide document ID and relevant page(s).

Periodic Consultation of tariff methodology: chapter 14 pages 45-46

#### C.10.D. Indicative non-transmission tariffs for non-transmission services to network users [Articles 26(1)(c)(ii)(4)].

Formula and description:

According to the principles of regulation method for datahub service, the target turnover to be collected by datahub charge is 60 000 € in 2026. Gasgrid Finland is entitled to collect regulated profit from datahub service. There are approximately 3 900 delivery points which are subject to the invoice of the datahub charge. The datahub charge for 2025 is 1,29 €/metering point/month.

Underutilization fee is applicable in the Balticconnector interconnection point and it is applied only during days, when Balticconnector is congested. Shippers may renominate downward in the Balticconnector free of charge a maximum of 50 000 kWh/h (tolerance) compared to the Shipper's highest confirmed nomination for the gas day. For amounts exceeding the tolerance limit, the shipper shall pay an underutilization fee which is 0,002 €/kWh. Balticconnector underutilization fee is not subject for profit. The revenue of this component will not be included to the non-transmission service pool (income is returned back to market by neutrality charge of balancing).

Reference to consultation document(s). Provide document ID and relevant page(s).

Periodic Consultation of tariff methodology: chapter 14 pages 45-46

## D. Compared tariffs and tariff model [Article 26(1)(d)]

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### D.11. The indicative information set out in Article 30(2)

The comparison should be based on indicative reference prices. Whenever the data necessary for this comparison is not available at the time of the consultation on the RPM (e.g.: multipliers and seasonality), provide the date and the source where the information will be available.

D.11.A. Comparison between transmission tariffs applicable for:

- the prevailing tariff period, and for
- the tariff period for which the information is published.

Explain the difference between the level of transmission tariffs [Articles 26(1)(d), 30(2)(a)(i)].

Comparison with the past tariff period. The comparison should be based on transmission tariffs.

Reference to consultation document(s). Provide document ID and relevant page(s).

Periodic Consultation of tariff methodology: chapter 17. pages 49 - 51

Link to information on TSO/NRA website.

<https://gasgrid.fi/en/our-services/transmission-tariffs-and-service-price-list/>

**D.11.B. Comparison between transmission tariffs applicable for:**

- the tariff period for which the information is published, and for
- each tariff period within the remainder of the regulatory period.

**Provide estimated difference in the level of transmission tariffs [Articles 26(1)(d), 30(2)(a)(ii)].**

Comparison with upcoming tariff periods. The comparison should be based on transmission tariffs.

Reference to consultation document(s). Provide document ID and relevant page(s).

Periodic Consultation of tariff methodology: chapter 17. pages 49 - 51

Link to information on TSO/NRA website.

<https://gasgrid.fi/en/our-services/transmission-tariffs-and-service-price-list/>

**D.11.C. At least a simplified tariff model, updated regularly, enabling network users to calculate the transmission tariffs applicable for the prevailing tariff period and to estimate their possible evolution beyond such tariff period [Articles 26(1)(d), 30(2)(b)].**

Tariff model for prevailing tariffs and future tariff periods. The simplified tariff model should serve for the calculation of tariffs. If the information on multipliers and seasonality is not available at the time of the publication of the consultation on the RPM, it should be indicated. By the time this information is published, the simplified tariff model should be updated to include information on tariffs.

Reference to consultation document(s). Provide document ID and relevant page(s).

Periodic Consultation of tariff methodology: chapter 16, page 49

Link to information on TSO/NRA website.

<https://gasgrid.fi/en/our-services/transmission-tariffs-and-service-price-list/>

**D.11.D. Explanation of how to use the simplified tariff model [Articles 26(1)(d) and 30(2)(b)].**

Reference to consultation document(s). Provide document ID and relevant page(s).



## E. Fixed payable price under price cap regime [Article 26(1)(e)]

### E.12. Where the fixed payable price referred to in Article 24(b) is offered under a price cap regime for existing capacity

Is the fixed payable price referred to in Article 24(b) offered under a price cap regime for existing capacity.

- ☐ Yes  
☒ No

## Documentation submission to the Agency

The online template and the tool for the submission of files to the Agency is implemented over a secure IT connection based on https.

### Final consultation on the RPM

The Agency requests the NRA/TSO responsible for launching the final consultation on the RPM to follow the below requirements when submitting the consultation documentation to the Agency:

- **All files containing numerical data** must be provided to the Agency in non-protected Excel or Excel compatible files independently of how they are published in the consultation.
- **Files containing text** must be provided to the Agency in Word, Word compatible files, or PDF.
- **Files containing images** must be provided to the Agency in a commonly used image formats or PDF.
- **All data must be provided in non-protected files** that allow editing. If PDFs are used, they must not be protected against editing (e.g.: they must allow copying the text of the PDF)
- **Confidential information must be clearly marked as confidential. In the cases where the consultation includes confidential information, a non-confidential version of the consultation must also be provided as part of the documentation.** Such version can be prepared erasing or aggregating the sensible information to render the data non-confidential.

Upload consultation documentation

Provide a description of the uploaded documents and how they relate to the consultation (e.g.: main documents, supporting files, etc)

'Periodic Consultation of Tariff Methodology' and 'Määäääjoin järjestettävä kuuleminen tariffimetodologiasta' (version translated into Finnish language) are the main documents. 'Simplified tariff model\_Gasgrid Finland' is a supporting file.

Information on confidentiality. If any of the submitted files are subject to confidentiality rules, please identify these files and provide additional non confidential versions.

### Cost allocation assessment justification

Does the capacity and/or the commodity cost allocation comparison index, as per Articles(3)(c) and Article (4)(c), exceed 10%?

☒ Yes

☐ No

In the cases where the cost allocation assessment exceeds 10%, ACER request a justification to be submitted as part of the consultation. Such information can be provided to ACER at the time of launching the final consultation allowing ACER with sufficient time to review it. See section on the cost allocation assessment for more details.

Upload supporting files with the justification for the cost allocation assessment.

Comments, if relevant.

### Additional supporting documents

For the purpose of making the implementation of the TAR NC more efficient, the Agency provides below two sections to facilitate information on intermediate consultations and on the publication of stakeholder responses relative to the final consultation on the RPM. The Agency advocates that NRAs/TSOs provide links to this data and/or the documentation itself by the time it is available. The survey can be accessed after the submission of the final consultation for the purpose of providing this data.

### Final consultation on th RPM: responses and summary

Upload consultation documentation

Link to the consultation documents.

### Intermediate consultation(s) on th RPM

Upload intermediate consultation documentation.

Link to the consultation documents.

## Appendix: Instructions for using the survey

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The online template and the tool for the submission of files to the Agency is implemented over a secure IT connection which will be operational as of end of September 2017.

### Reading the survey

The online template lists all legal requirements for the consultation on the RPM according to Article 26. In addition, it provides interpretation and guidelines to several requirements of Article 26. These two levels of text can be distinguished based on the colour of the typography used:

- **Blue typography** replicates the text of the Tariff NC and provides references to articles of the Tariff NC.
- **Black typography** provides descriptions and clarifications to the text of the TAR NC.

The additional clarifications and guidelines provide the reasoning and arguments that ACER will employ when reviewing the consultations, following the requirement set in Article 27(2).

The online template is structured into five different sections following the structure of Article 26. At the end of the survey, a section for uploading the consultation document(s) is provided.

The online template mirrors all requirements laid out in the template checklist which is available at:

### Timeline for completing the survey

The online template can be filled as of its date of publication (5 July 2017). It can be saved as a draft and can be subsequently updated following the steps of the national process until the final submission.

The Agency advocates that the NRA/TSO responsible for the consultation provides the requested information relative to the consultation on the RPM using the online template. This includes:

- **Prior to the consultation**, the NRA/TSO should provide details relative to the contact point, the estimated timeline for the consultation, and the planning of intermediate consultations, if any.
- **After the publication of the final consultation**, the NRA/TSO should submit details relative to the publication of the stakeholder responses [Article 26(3)] and the NRA motivated decision [Article 27(4)].

### NRA/TSO input on the survey

When filling out the survey, the NRA/TSO responsible for the consultation on the RPM, should provide the following information:

- **Descriptions and justifications** based the requirements listed on Article 26.

- **References to the consultation document(s)** where the requested information can be found. References should include the name of the document and the page(s) being referred.
- **Relevant information on the consultation process.**

Whenever the format of the survey incurs in any incompatibility with the structure of the consultation, the NRS/TSO should contact ACER.

### Submission of the consultation document(s) to the Agency

This platform allows NRAs/TSOs submitting the consultation document(s) to the Agency. The submission of these documents is an obligation laid out under Article 27(1) and it is independent of the use that NRAs /TSOs make of the template. For this purpose, the NRA/TSO carrying out the consultation can use this file submission tool above.

### Publication of the survey summary

Upon filling in the requested information laid out in the online template tool, the NRA/TSO can access a summary of the consultation on PDF format. The PDF document can be included as an annex to the national consultation.

Regardless of the NRA/TSO decision to publish this document, the Agency will release on its website the completed templates as part of its analyses on the RPM consultations [Article 27(2)].

### Useful links

COMMISSION REGULATION (EU) 2017/460 of 16 March 2017 establishing a network code on harmonised transmission tariff structures for gas (NC TAR) (<http://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32017R0460&from=EN>)

ACER Tariff Template website ([http://www.acer.europa.eu/en/Gas/Framework%20guidelines and network%20codes/TAR IMP/Pages/default.aspx](http://www.acer.europa.eu/en/Gas/Framework%20guidelines%20codes/TAR_IMP/Pages/default.aspx))

### Contact

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