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Comments on the Proposed Changes to the Tariff Methodology as of 2027

Brussels, 24 October 2025 - Energy Traders Europe would like to express our concerns regarding the proposed changes to the methodology for the regulatory period 2027-2031 in the Netherlands, affecting the tariff setting in the future. We believe that the new approach may result in higher tariffs and unforeseeable spikes in tariff levels going forward, discouraging capacity bookings and reducing network utilisation.

We do not see why a move towards a cost-plus approach is deemed appropriate for the gas Transmission System Operator and we have not seen sufficient evidence supporting such shift. While there are multiple examples brought forward in the method decision with regard to challenges stemming from the energy transition on the power side, we emphasise that the situation of the gas sector is notably different. Most importantly, unlike in power, there is no need to stimulate investments.

Alongside falling network utilisation, gas network users will be facing a continued rise in tariffs unless the Regulated Asset Base (RAB) of GTS is adjusted accordingly. We firmly believe that this should be the focus of ACM's tariff methodology for gas, with a view to ensure a maximum level of tariff stability and predictability going forward. This relates both to disinvestment, as well as transfer of assets to a hydrogen network operator.

Furthermore, we do not think it is justified that ACM only corrects the tariffs for 'evident' inefficiencies. Network users should not pay for any inefficiencies. The system operator should also be incentivised accordingly to improve cost efficiency over time – a higher dynamic efficiency factor should therefore be considered under the new methodology.

We further note that the methodology does not allow for any sort of estimate of how the change in methodology will affect the tariff levels, neither in the first year after the shift, nor in the years that follow. We believe that the ACM will be facing a tremendous

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challenge when it comes to validating the efficiency of costs incurred by the system operators.

We conclude by emphasising that the methodology for the gas sector should seek to ensure maximum tariff stability for the benefit of consumers and a lean energy transition process. This cannot be achieved without strict scrutiny and due consideration given to the changes in RAB level as network utilisation falls.

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