



REPUBLIC OF BULGARIA
ENERGY AND WATER REGULATORY COMMISSION



Consultation document on the multipliers, seasonal factors and discounts, which will be applied for setting transmission tariffs for 2026 – 2027 gas year

According to the requirements of Art. 28 of Commission Regulation (EU) 2017/460 of 16 March 2017 establishing a network code on harmonised transmission tariff structures (Regulation (EU) 2017/460), the Energy and Water Regulatory Commission has to conduct a consultation with the national regulatory authorities of all directly connected Member States and the relevant stakeholders on the following:

- (a) level of multipliers;
- (b) level of seasonal factors and the calculations set out in Article 15 of Regulation (EU) 2017/460;
- (c) levels of discounts set out in Articles 9 (2) and 16 of Regulation (EU) 2017/460.

For gas year 1 Oct 2026 - 30 Sep 2027, EWRC proposes the calculation of reserve prices for non-yearly standard capacity products for firm capacity to be done using seasonal factors and multipliers.

The level of multipliers and seasonal factors is the same for all entry and exit points, as well as for the interconnection points. This approach is justified in order to ensure non-discriminatory access and elimination of cross-subsidization, as well as in view of the complexity of the transmission system in the Republic of Bulgaria.

The use of seasonal factors aims to achieve a balance between efficient network usage and the revenue collection of the transmission system operator. Low multiplier levels encourage network users to reserve short-term products, smoothing out their capacity booking profile, while high multiplier levels stimulate the reservation of long-term products lasting one or more years. The application of seasonal factors promotes the efficient system usage by changing the flows from periods of increased demand (winter) to periods of weak demand (summer) and reduces the negative impact that the booking of profiled capacity can have on the stability of the TSO revenues and tariffs.

The level of the multipliers was established taking into account the following principles:

- a) ensuring the balance between facilitating short-term gas trade on one hand and providing long-term signals for efficient investments in the transmission system and ensuring efficient revenue recovery on the other;
- b) avoiding volatility of tariffs;
- c) avoiding cross-subsidization between gas transmission network users.

The levels of the proposed multipliers and the calculated seasonal factors under Art. 15 of Regulation (EU) 2017/460, are as follows:

1. Multipliers used to determine the short-term product prices, as follows:

- 1.1 quarterly capacity products - 1.3;
- 1.2 monthly capacity products - 1.4;
- 1.3 daily capacity products - 2;
- 1.4 intraday capacity products - 2.5.

2. Values of seasonal factors:

2.1 Quarterly capacity products:

- 2.1.1. 2026 IV quarter (1 Oct – 31 Dec) – 1.13;
- 2.1.2. 2027 I quarter (1 Jan – 31 March) – 1.35;
- 2.1.3. 2027 II quarter (1 April – 30 June) – 0.87;
- 2.1.4. 2027 III quarter (1 July – 30 Sep) – 0.66;

2.2 Seasonal factors for monthly, daily and intraday capacity products:

- 2.2.1. October 2026 – 0.98;
- 2.2.2. November 2026 – 1.14;
- 2.2.3. December 2026 – 1.26;
- 2.2.4. January 2027 – 1.44;
- 2.2.5. February 2027 – 1.44;
- 2.2.6. March 2027 – 1.17;
- 2.2.7. April 2027 – 1.17;
- 2.2.8. May 2027 – 0.83;
- 2.2.9. June 2027 – 0.60;
- 2.2.10. July 2027 – 0.62;
- 2.2.11. August 2027 – 0.55;
- 2.2.12. September 2027 – 0.81.

The calculations under Art. 15 of Regulation (EU) 2017/460 of the seasonal coefficients for monthly, daily and intraday capacity products are set out in Annex 1 to this consultation document and the attached file in Excel.

According to Art. 13 of Regulation (EU) 2017/460, where seasonal factors are applied, the arithmetic mean 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 respective multipliers level, namely:

- for quarterly standard capacity products and for the 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 intraday standard capacity products, the level of the respective multiplier shall be no less than 1 and no more than 3.

The arithmetic mean value of the multipliers applicable to the corresponding standard capacity product and the corresponding seasonal coefficients shall be as follows:

Month	Capacity products			
	Quarterly	Monthly	Daily	Intraday
October 2026	1,469	1,372	1,960	2,450
November 2026		1,596	2,280	2,850
December 2026		1,764	2,520	3,150
January 2027	1,755	2,016	2,880	3,600
February 2027		2,016	2,880	3,600
March 2027		1,638	2,340	2,925
April 2027	1,131	1,638	2,340	2,925
May 2027		1,162	1,660	2,075
June 2027		0,840	1,200	1,500
July 2027	0,858	0,868	1,240	1,550
August 2027		0,770	1,100	1,375
September 2027		1,134	1,620	2,025
Average	1,30	1,40	2,00	2,50

The values of the discounts under Art. 9 and Art. 16 of Regulation (EU) 2017/460 are as follows:

According to Art. 9(1) of Regulation (EU) 2017/460 for capacity-based transmission tariffs at entry points from storage facilities and exit points to storage facilities, a discount of at least 50 % shall be applied unless and to the extent that a storage facility that is connected to more than one transmission or distribution network is used to compete with an interconnection point.

Regulation (EU) 2022/1032 of the European Parliament and of the Council of 29 June 2022 amending Regulations (EU) 2017/1938 and (EC) No 715/2009 (Regulation (EU) 2022/1032) in relation to gas storage provides for the possibility for national regulatory authorities to apply a discount of up to 100% to capacity-based transmission and distribution tariffs, to entry points from and exit points to underground gas storage facilities and LNG facilities, unless and to the extent that such facility that is connected to more than one transmission or distribution network is used as a competitive alternative to an interconnection point.

On the territory of the Republic of Bulgaria there is only one gas storage – Chiren underground gas storage (UGS), whose operator is Bulgartransgaz EAD.

Given the importance of natural gas storage facilities for security of supply, the adjustment of seasonal irregularities in natural gas consumption, the security of the gas transmission system, as well as the requirements of European legislation for the use of a discount on access tariffs at entry and exit points into/from storage facilities, it is justified to apply a 100% discount on the calculated cost-oriented tariffs, for a natural gas storage facility connected to the transmission system owned by the company.

According to Art. 9 (2) of Regulation (EU) 2017/460 at entry points from liquefied natural gas facilities and at entry points from and exit points to infrastructure designed to overcome the isolation of Member States with regard to their transmission systems, a discount may be applied to relevant capacity-based transmission tariffs in order to enhance security of supply.

The provision of Art. 9 (2) of Regulation (EU) 2017/460 shall not be applied to the Bulgarian transmission system as it is not connected to LNG facilities or infrastructure developed to overcome the isolation of Member States with regard to their gas transmission systems.

The calculation of the reserve prices for standard products for interruptible capacity is defined in Art. 16 of Regulation (EU) 2017/460. The application rules and calculation of a preliminary discount are set out in Art. 16, par. 1 – 3 of Regulation (EU) 2017/460.

Given that in the period 1.01.2025 – 31.12.2025 in the exit direction for Kulata/Sidirokastro entry/exit IP cases of physical overload were reported, with a total interrupted capacity of 132 937 MWh, for the gas year 2026/2027 a preliminary discount (ex-ante discount) should be applied at Kulata/Sidirokastro exit point, calculated in accordance with the requirements of paragraphs 2 and 3 of Art. 16 of Regulation (EU) 2017/460, amounting to 5.12% with a correction factor $A = 1$.

According to Art. 16 (4), first sentence of Regulation (EU) 2017/460, as an alternative to the application of ex-ante discounts, the national regulatory authority may decide to apply an ex-post discount where network users are compensated after actual interruptions have been incurred. Such ex-post discount may be used only at interconnection points where there has been no capacity interruption due to physical congestion in the previous gas year – Art. 16 (4), second sentence of Regulation (EU) 2017/460. The ex-post compensation paid for each day on which an interruption occurred shall be equal to three times the reserve price for daily standard capacity products for firm capacity - Art. 16 (4), third sentence of Regulation (EU) 2017/460.

Given that all other interconnection points lack historical data for calculating interruption probability and also that no interruptions and directions at interconnection points are foreseen in the indicative scenario for gas year 2026/2027, it is justified to apply an ex-post discount based on actually measured interruption duration (ex-post discount).

In the event of interruption, users who have reserved interruptible capacity will be compensated by applying an ex-post discount equal to three times the reserve price for daily capacity products calculated over the actually interrupted capacity in accordance with the following formula:

$$D = 3 * P_{dp} * C * t ,$$

where:

D is the discount, EUR;

P_{dp} is the price for daily capacity product, EUR/kWh/d;

C is the actual amount of interrupted capacity, kWh/h;

T is the interruption time, h.

EWRC invites all interested parties to submit their opinions no later than 27 May 2026. In case the opinions contain confidential data and information that cannot be published by EWRC on

its website, this must be explicitly and clearly stated, otherwise EWRC will consider that the correspondent agrees with the processing and publication of the information provided.

This Consultation document on the multipliers, seasonal factors and discounts applied for setting transmission tariffs for 2026 – 2027 gas year, has been adopted by EWRC with a decision under Protocol No 100/30.04.2026, item

Seasonal factors for monthly, daily and intraday capacity products

Month	Total monthly forecast quantities (art. 15 (3)a) [kWh]	Sum of monthly forecast quantities (art. 15 (3)b) [kWh]	Usability level (art. 15 (3)c)	Initial level of coefficients (art. 15 (3)e)	Arithmetic mean of the products of (5) with the monthly product multiplier (art. 15 (3)f)	Arithmetic mean of the products of (5) with the daily product multiplier (art. 15 (3)f)	Arithmetic mean of the products of (5) with the intraday product multiplier (art. 15 (3)f)	Final value of coefficients for monthly product (art. 15 (3)g)	Final value of coefficients for daily product (art. 15 (3)g)	Final value of coefficient for a product intraday (art. 15 (3)g)
(1)	(2)	(3)	(4)=(2)/(3)	(5)=((4)*12)^1	(6)	(7)	(8)	(9)	(10)	(11)
Oct-26	15 197 676 205	186 428 700 000	0,0815	0,9782	1,3695	1,9565	2,4456	0,98	0,98	0,98
Nov-26	17 773 287 038	186 428 700 000	0,0953	1,1440	1,6016	2,2881	2,8601	1,14	1,14	1,14
Dec-26	19 592 084 929	186 428 700 000	0,1051	1,2611	1,7655	2,5222	3,1527	1,26	1,26	1,26
Jan-27	22 336 826 926	186 428 700 000	0,1198	1,4378	2,0129	2,8755	3,5944	1,44	1,44	1,44
Feb-27	22 379 264 653	186 428 700 000	0,1200	1,4405	2,0167	2,8810	3,6013	1,44	1,44	1,44
Mar-27	18 136 208 508	186 428 700 000	0,0973	1,1674	1,6343	2,3348	2,9185	1,17	1,17	1,17
Apr-27	18 145 187 282	186 428 700 000	0,0973	1,1680	1,6352	2,3359	2,9199	1,17	1,17	1,17
May-27	12 889 123 709	186 428 700 000	0,0691	0,8296	1,1615	1,6593	2,0741	0,83	0,83	0,83
Jun-27	9 294 702 976	186 428 700 000	0,0499	0,5983	0,8376	1,1966	1,4957	0,60	0,60	0,60
Jul-27	9 558 918 523	186 428 700 000	0,0513	0,6153	0,8614	1,2306	1,5382	0,62	0,62	0,62
Aug-27	8 547 802 779	186 428 700 000	0,0459	0,5502	0,7703	1,1004	1,3755	0,55	0,55	0,55
Sep-27	12 577 616 473	186 428 700 000	0,0675	0,8096	1,1334	1,6192	2,0240	0,81	0,81	0,81
Arithmetic mean value					1,40	2,00	2,50			
Comparison with the best limit					Да	Да	Да			

Seasonal factors for quarterly capacity products calculated according to Art. 15 (5)(a)(i)

Quarter	Factor
2026 IV quarter (1 Oct - 31 Dec)	1,13
2027 I quarter (1 Jan - 31 March)	1,35
2027 II quarter (1 April - 30 June)	0,87
2027 III quarter (1 July - 30 Sep)	0,66