24 August 2026

Revision of the Network Code on Capacity Allocation Mechanisms in Gas Transmission Systems

Eurogas' Recommendations

Eurogas welcomes the Commission's objective to improve capacity availability, market responsiveness and transparency through stronger capacity maximisation, more short-term products and clearer auction design. At the same time, these changes must be accompanied by robust enforcement by National Regulatory Authorities, sufficient product liquidity and realistic implementation timelines to ensure that the benefits translate into actual capacity release and operational certainty for Transmission System Operators and shippers.

On the extension of the scope of application to interconnection points (IPs) with third countries [Art.2]

Eurogas acknowledges that derogations from applying network codes to IPs may be requested, in line with Art.70(3) of the Gas Regulation. In line with the Regulation, any derogation that would be granted must be narrow, transparent and well-justified to avoid corridor-by-corridor fragmentation. Any derogation must not be detrimental to the functioning of the internal market or to the security of supply of the Union.

Capacity calculation and maximization [Art.6]

Stronger obligations on Transmission System Operators (TSOs) to recalculate and maximise firm capacity at least twice per year improve capacity availability for the market and congestion visibility. Eurogas supports this measure, and notes the importance of ensuring strict National Regulatory Authority (NRA) enforcement to ensure actual capacity release.

In addition, a shift from maximum 'technical' capacity to maximum 'firm' capacity is being considered. We would welcome further clarification on the rationale behind this change.

Allocation Methodology [Art.8]

According to Art.8, an amount at least equal to 10% of the existing technical capacity at each IP shall be offered no earlier than at the quarterly capacity auction. We welcome the proposal, which maintains flexibility through shorter-term products, but we remain cautious about increasing the share reserved for short-term products beyond the proposed minimum. Reserving additional capacity for short-term products could reduce availability in the annual auction and could increase the premium on long-term products.

Balance-of-Month (BoM) product

We support the introduction of a BoM product which would enhance short-term optimisation and reduce defensive over-booking. The introduction of a new product warrants an appropriate tariff multiplier and sufficient capacity. Notably, we would welcome clarification as to whether the multiplier will be a standard one irrespective of the duration of the BoM in days, or if it will vary.

The design of the product should also fit the auction calendar and not distort the day-ahead auctions.

The same BoM option should be offered for interruptible capacity, so that interruptible users are not disadvantaged if the BoM product becomes cheaper than daily interruptible.

Additional Standard Capacity Products: Weekly and Balance of Week (BoW)

We appreciate the intention of the Commission and ACER to ensure that deliveries of LNG across the TSO network are facilitated through more diverse capacity contracts matching the commodity deals. Based on our experience, even shorter-term products, such as weekly and/ or balance-of-week, would be helpful in the cases of terminals where the regasification periods are limited to 7-10 days at a certain point within the month (e.g., Germany), instead of spreading across the calendar month.

Additional auctions

Re-offering unsold capacity through additional auctions improves utilisation and market responsiveness; this is supported as a necessary complement to capacity maximisation. For this purpose, we support a weekly auction frequency and would welcome a detailed auction calendar outlining when the additional auctions would take place. Our understanding is that the additional auction for a given product (e.g. yearly) would only continue until the next shorter-duration auction is launched (e.g. quarterly), which implies a limited number of additional auctions. The considered revision would state that **"only the upcoming quarter"** shall be offered in the additional quarterly auction. For instance, in the August quarterly auction, only Q4 would be re-offered through weekly additional auctions, not Q1-Q3 of the gas year, in our interpretation. This would limit the additional auction opportunities, reinforcing the preference for implementing a weekly auction frequency.

Auction design and flexibility

Clearer auction design and limited parameter flexibility improve price discovery under volatile conditions; Eurogas supports this, with a strong requirement for EU-wide consistency and transparency. Our understanding of the proposal is that standard yearly, quarterly and monthly auctions would be offered based on the Ascending Clock Auction mechanism, while additional yearly, quarterly and monthly auctions would use a Uniform Price Auction mechanism. We understand the operational rationale for using UPA in the additional auctions, particularly given the higher auction frequency and the desire for a simple and fast allocation process. However, we note that the additional auctions offer the same yearly, quarterly and monthly products that are allocated through ACA in the primary auction process. It would therefore be useful to better understand the expected benefits of moving from ACA to UPA for the re-offering of these products.

Incremental capacity process [Chapter V]

The new provisions on incremental capacity shift away from incremental expansion towards optimising the existing infrastructure. This streamlining of the process is understandable; however, a minimum level of process discipline should be retained where incremental capacity is systemically justified.

Modification of auction parameters

A considered change to the auction parameters provides for a 12-hour notification period rather than the one-day period proposed by ACER for the publication of available capacity for annual, quarterly and monthly auctions. It is important to revert to a one-day period for operational reasons. Furthermore, the long-term nature of the products does not justify such a short notification period, potentially occurring overnight.

Transitional Timeline

We understand the additional and Balance of Month auctions will apply from the gas year following their inclusion in the first auction calendar published 12 months after the entry into force of the Regulation, hence in two years, which is reasonable transitional period.

The foreseen increase in the number of auctions will require robust auction handling by the booking platforms and will also increase the auction data management for the TSOs. As shown by the recent experience with the July 2025 auctions of annual capacity products held via the PRISMA platform, which resulted in several cancellations and duplicate reporting of acquired products, the amendment process should offer generous implementation timelines to minimize the impact on TSOs and the risk for errors.

We welcome the intention of the EU Commission to lay out such timelines in the revised CAM NC, as expressed during the workshop in November 2025. This should particularly be so in complex interconnection points with competing auctions, and hence various TSOs feeding data, so that shippers' booking strategies are not exposed to one another.