

PUBLIC CONSULTATION No. 2025-12

The Energy Regulatory Commission (CRE) is consulting market players.

Public consultation of October 29th 2025, on the non-marketing of certain firm gas transmission capacities and the mechanisms of the single gas market zone in France to reduce the risk of congestion on the NaTran and Teréga transmission networks between December 1st 2025, and March 31st 2026

Translated from the French: only the original in French is authentic

The session was attended by: Emmanuelle WARGON, President, Anthony CELLIER and Valérie PLAGNOL, Commissioners.

The single gas market zone in France, *Trading Region France* (TRF), became operational on November 1st 2018, replacing the two previous marketplaces, PEG Nord and *Trading Region South* (TRS). It has enabled the creation of a single price for all French consumers, access to varied and competitive sources of supply depending on global market conditions, and the strengthening of the liquidity and attractiveness of the French gas market.

The CRE's decisions of October 26th 2017¹, July 24th 2018², May 29th 2019³, December 12th 2019⁴, December 13th 2022⁵, October 12th 2023⁶, July 4th 2024⁷, October 10th 2024⁸ and September 24th 2025⁹ defined the implementation procedures and operating rules for the single gas market zone in France.

Within the single market zone, congestion may occur in certain network usage configurations. The CRE deliberations mentioned above defined the various congestion management mechanisms that can be used by gas transmission system operators (TSOs) and the order in which they can be triggered.

On September 26, 2025, a leak occurred on a pipeline in NaTran's transmission network, located in Saint-Rémy-de-Provence. This led to the interruption of gas transit on this pipeline (named *Artère du Rhône*) and, at the date of this public consultation, had the following consequences on gas transmission capacities within the TRF:

¹ Decision No. 2017-246 of October 26, 2017, on the creation of a single gas market zone in France as of November 1, 2018.

² Deliberation No. 2018-171 of July 24, 2018, on the operation of the single gas market zone in France.

³ Deliberation No. 2019-120 of May 29, 2019, amending the deliberation of October 26, 2017, on the operation of the single gas market zone in France.

⁴ Deliberation No. 2019-276 of December 12, 2019, on the functioning of the single gas market zone in France.

⁵ Deliberation No. 2022-352 of December 13, 2022, on the decision relating to the operation of the single gas market zone in France.

⁶ Deliberation No. 2023-318 of October 12, 2023, on the decision relating to the management of south-to-north congestion within the framework of the operation of the Trading Region France (TRF).

⁷ Deliberation No. 2024-132 of July 4, 2024, on the decision to modify the threshold for small works by GRTgaz and Teréga (operation of the TRF).

⁸ Deliberation No. 2024-181 of October 10, 2024, on the decision regarding the terms and conditions for managing south-to-north congestion within the framework of the Trading Region France (TRF).

⁹ Deliberation No. 2025-221 of September 24, 2025, on the decision regarding the methods for managing south-to-north congestion on gas transmission networks.

- a reduction in the entry capacity of the NaTran gas transmission network from the Fos LNG terminals to a minimum level of 200 GWh/day instead of the previous 380 GWh/day, adjustable upwards on D-1;
- a reduction of -160 GWh/day in the SN1, SN3, NS3, and NS4 limits¹⁰.

NaTran's publications on the ENTSOG *Transparency Platform* website indicate that these limitations will end on July 1, 2026¹¹.

On October 27, 2025, in light of these new constraints, NaTran and Teréga shared their analyses of the French gas transmission network's operation in the coming months with the CRE. NaTran specifically recommended that the CRE suspend the marketing of certain capacities in order to limit congestion during the 2025-2026 gas winter.

In a letter dated October 29, 2025, addressed to NaTran and Teréga, the CRE did not oppose NaTran's request not to market, during the auction on November 3, 2025, the firm quarterly capacities at the Pirineos entry point for the first quarter of 2026.

More broadly, the operating conditions of the TRF zone, and in particular the marketing of available capacity at different maturities, must evolve to take into account the decline in gas transmission capacity within the TRF zone during the winter of 2025-2026.

This public consultation concerns the conditions for marketing gas transmission capacity for the 2025-2026 gas winter at points in the transmission network where this capacity is likely to exacerbate internal congestion in the TRF zone. The CRE may also take into account comments from market players concerning the TRF's congestion management mechanisms.

The CRE emphasizes that the security of gas supply in France for the winter of 2025-2026 is not in question. Storage facilities are approximately 93% full¹² and entry capacities at other points in the territory will compensate for the decrease in entries at Fos following the interruption of the Artère du Rhône pipeline.

Given the timeframe within which the measures considered in this public consultation are to be implemented, the deadline for submitting responses is set at November 10, 2025.

At the end of this public consultation, the CRE intends to deliberate on the conditions for marketing gas transmission capacity for the 2025-2026 gas winter and on changes to the TRF operating mechanisms.

Paris, October 29, 2025.

For the Commission de régulation de l'énergie,

The President,

Emmanuelle WARGON

¹⁰ The entry and exit points associated with these limits are detailed in the appendix.

¹¹ In its publications on the lowering of the SN1, SN3, NS3, and NS4 limits, NaTran stated that this would remain in effect until further notice.

¹² Storage facilities were 93% full as of October 29, 2025.

Responding to the consultation

The CRE invites interested parties to submit their contributions by November 10, 2025, at the latest, by entering them on the platform set up by the CRE: <https://consultations.cre.fr>.

In the interests of transparency, contributions will be published by the CRE.

If your contribution contains information that you wish to keep confidential, a version with this information redacted must also be submitted. In this case, only this version will be published. The CRE reserves the right to publish information that may be essential to all stakeholders, provided that it is not protected by law.

In the absence of an redacted version, the full version will be published, subject to information covered by legally protected secrets.

Interested parties are invited to respond to the questions, providing reasons for their answers.

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1. List of questions

Question 1: Do you support the CRE's proposal to suspend the marketing of firm monthly entry capacities at Pirineos for the months of December 2025 to March 2026?

Question 2: Are you in favor of the CRE's proposal to suspend the marketing of monthly firm exit capacity at Oltingue for the months of December 2025 to March 2026, provided that the Italian, Swiss, and German authorities confirm that their countries' security of supply will not be affected by this measure?

Question 3: Are you in favor of continuing to market available interruptible capacity at the Pirineos entry point?

Question 4: Are you in favor of continuing to market firm daily entry capacity at the Pirineos point and exit capacity at the Oltingue point?

Question 5: Do you have any proposals other than those mentioned in this public consultation to limit the risk of congestion during the 2025-2026 gas winter? If so, please provide an analysis of the advantages and disadvantages of your proposals.

2. Legal framework

Article L. 134-2, 4° of the Energy Code gives the CRE the power to specify "*the rules concerning [...] the tasks of natural gas transmission system operators [...] in terms of the operation and development of these networks,*" "*the tasks [...] of underground natural gas storage operators*" and "*the conditions of use of natural gas transmission networks.*"

In accordance with these provisions, the CRE defined the rules for the operation of the TRF in its decision of September 24, 2025¹³. The congestion management mechanisms within the TRF are as follows:

	NS1	NS2 to NS4 E02 and S1	SN0 to SN4
In the event of daily constraints	1. If possible, implementation of inter-operator mechanisms, particularly with Fluxys		1. Cut off the UIOLI storage at the upstream withdrawal point
	2. Interruption of interruptible capacities		2. Interruption of interruptible capacities on both sides of the border ¹⁴
	3. Interruption of output capacities at PITS above nominal levels		
	4. Non-marketing of available firm capacity		
			5. Storage swap (for SN3 and SN4)
			6. Localized <i>spread</i>
In the event of failure of the above mechanisms		7. Mutualized restriction	
		8. Anticipated restriction	

Table 1. TRF congestion management mechanisms in order of priority

3. NaTran analysis of the consequences on TRF operations

NaTran conducted an assessment of the risk of congestion on the south-north borders during the 2025-2026 gas winter following the incident in Saint-Rémy-de-Provence, with the following conclusions:

- The reduction to 200 GWh/day (level adjustable upwards on D-1) of gas entry capacities from the Fos LNG terminals follows the decrease in physical gas transmission capacities from the south to the north of the territory. It allows a maximum level of congestion that is stable compared to previous winters.
- This reduction in gas intake capacity from the Fos LNG terminals will result in a loss of supply on the TRF, estimated by NaTran at around 19 TWh¹⁵ during the 2025-2026 gas winter. All other things being equal, these volumes of gas will have to enter the TRF via other points. However, the arrival of all or part of these 19 TWh upstream of the congestion front will contribute to increasing the risk of congestion. Similarly, any additional quantity of gas leaving the territory downstream of the congestion front will contribute to increasing the risk of congestion.

¹³ Deliberation No. 2025-221 of September 24, 2025, deciding on the terms and conditions for managing south-to-north congestion on gas transmission networks.

¹⁴ For points aggravating congestion.

¹⁵ Assuming that the Fos terminals would have emitted an average of 325 GWh/day during the winter without the new limitations, and that they will only emit an average of 200 GWh/day during this period.



Figure1 : Diagram of congestion fronts from south to north

If no additional measures are taken, NaTran forecasts that during the 2025-2026 gas winter, based on supply pattern assumptions and consumption levels, congestion volumes of around 0.5 TWh in the most favorable case, and around 15 TWh in the most unfavorable scenarios (compared with the historical maximum of 5.8 TWh during the 2022-2023 gas winter). In particular, supply patterns that maximize inflows to Pirineos are responsible for the most unfavorable scenarios. Maximizing outflows at Oltingue also has an effect, albeit more limited, on increasing congestion volumes.

NaTran's analysis indicates that average daily congestion for the 2025-2026 gas winter under average climate conditions could vary between 22 GWh/day and 145 GWh/day during congestion episodes, depending on the scenario.

According to NaTran's analysis, in unfavorable scenarios, the volume of congestion could be significant, leading to high localized *spread* costs and increasing the risk that this mechanism will be unsuccessful, thereby triggering last-resort mechanisms (mutualized or anticipated restrictions).

Finally, NaTran points out that excessive congestion volumes in the coming months could pose a risk to security of supply at the end of the 2025-2026 gas winter. This is because existing congestion management mechanisms, particularly localized *spreads*, tend to accelerate the withdrawal of storage in the north. If these storage facilities are depleted too quickly at the beginning of winter, the remaining quantities at the end of winter may not be sufficient to meet demand in the north in the event of a cold snap.

Natran will hold an information workshop for market players on November 6, 2025.

Teréga broadly agrees with NaTran's analysis. Teréga's assessment of the maximum congestion risk during the 2025-2026 gas winter is about 13.5 TWh in the most unfavorable scenarios.

On this basis, in a letter dated October 29, 2025, addressed to NaTran and Teréga, the CRE did not oppose NaTran's request not to market, at the auction on November 3, 2025, the firm quarterly capacities at the Pirineos entry point for the first quarter of 2026.

4. Requests from gas transmission system operators

With the exception of anticipated restrictions, existing congestion management mechanisms only allow TSOs to act on a daily basis. These mechanisms are designed to resolve daily congestion, but do not prevent it. Only anticipated restrictions can sustainably reduce the use of network points that generate congestion. However, TSOs believe that capacity restrictions (whether mutualized or anticipated) should be avoided as far as possible, as they undermine the firmness of the capacity traded.

With this in mind, NaTran considers that existing congestion management mechanisms may not be sufficient to avoid significant restrictions on firm capacity during the 2025-2026 gas winter. NaTran therefore proposes suspending the marketing of certain firm capacity products at points that could exacerbate congestion during the 2025-2026 gas winter. According to NaTran, implementing this measure would limit congestion volumes during the 2025-2026 gas winter to a maximum of 8 TWh (compared to around 15 TWh if no additional measures are taken). More specifically:

- for the Pirineos point, at the entry point: NaTran proposes suspending all marketing of monthly firm capacity for the months of December 2025, January, February, and March 2026, with the possibility of marketing the corresponding capacity on a daily firm or interruptible basis;
- for the Oltingue point, at the exit: NaTran considers that the use of capacity is likely to increase the risk of congestion, but stresses that it is necessary to involve the Swiss, Italian and German TSOs and authorities before taking any decision that could affect the security of supply in these countries. In addition, the volumes of firm capacity remaining to be marketed at Oltingue are lower than those at Pirineos. ;

NaTran proposes to suspend all or part of the marketing of these capacities during the 2025-2026 gas winter if the evolution of the risk of congestion, or the level of gas in northern storage facilities allows it.

Finally, NaTran emphasizes that the marketing of firm daily and intraday capacities is already subject to network congestion (see section 2) and therefore does not require any change to the rules in force.

Teréga wishes to maintain the marketing of firm monthly capacities for December 2025, January, February, and March 2026 at Pirineos entry. Teréga nevertheless considers that a possible suspension of these sales could indeed be decided on a month-by-month basis, depending on how the situation evolves.

5. Preliminary analysis by the CRE

Firstly, the current situation does not call into question the security of gas supply in our country for the winter of 2025-2026. Storage facilities are approximately 93% full and entry capacities at other points in the territory will compensate for the drop in entries at Fos following the interruption of the Artère du Rhône pipeline.

This public consultation tackles the changes to the operating conditions of the TRF zone necessary to limit congestion from the south to the north of the country during the winter of 2025-2026, following the interruption of the Artère du Rhône pipeline.

Mutualized and anticipated restrictions interrupt the use of firm capacity, thereby degrade the commercial offer of TSOs and disrupt the supply of shippers at very short notice. They should be avoided as much as possible.

In particular, it is not desirable to market additional firm capacity if it has to be frequently interrupted due to congestion on the network.

Furthermore, since 2022, the localized *spread* mechanism has been used 200 times, systematically in the south-north direction. Localized *spreads* have been successful 85% of the time, with an average requirement per localized *spread* call of 46 GWh/day. When calls were unsuccessful, the average requirement was significantly higher (79 GWh/day).

Thus, on any given day, the greater the volume of the localized *spread* call, the higher the risk of it being unsuccessful. The failure of this call may result in the use of capacity restrictions.

NaTran's analysis shows that the daily congestion volumes expected during the 2025-2026 gas winter could be significantly higher than the volumes that can be absorbed by the localized *spread* mechanism

(145 GWh/day on average during congestion episodes in scenarios where the Pirineos entry point is fully utilized), leading to the likely use of restriction mechanisms.

Consequently, the CRE considers at this stage that NaTran's proposal to suspend the marketing of monthly firm capacity for the 2025-2026 gas winter is relevant. This measure makes it possible, by acting in advance, to limit congestion volumes and reduce the use of mutualized or anticipated restrictions. It takes into account the physical reality of the gas transmission network in France, which is no longer capable, due to the cut-off of the *Artère du Rhône* pipeline, of flowing as much gas from the south to the north of the country.

Regarding the points likely to be affected by this measure, the CRE notes that:

- for the Pirineos entry point, this is quantitatively the point likely to cause the highest volume of congestion;
- for the exit at Oltingue, the measure could be considered. Furthermore, the CRE considers at this stage that it is not possible to implement it without confirmation from the TSOs and the Swiss, German, and Italian authorities that there will be no impact on the security of supply in their countries.

The CRE therefore considers at this stage that it is desirable to take priority action on the Pirineos PIR at the entry point.

Furthermore, the suspension of firm capacity sales only needs to apply to monthly firm products because:

- There is already a mechanism in place to suspend marketing of firm daily capacity in the event of congestion risk (fourth mechanism, see 2). There is therefore no need to suspend marketing of daily products as a preventive measure.
- It is no longer possible to market quarterly and annual firm capacity that can be used during the 2025-2026 gas winter at the Pirineos PIR.
- Interruptible capacities may be interrupted in the event of a proven risk of congestion or actual congestion (second congestion management mechanism). The sale of such capacities cannot therefore cause congestion.

Apart from entry capacity at Pirineos and exit capacity at Oltingue, the operators of transmission networks, storage facilities, and LNG terminals have informed the CRE that there is no significant firm capacity remaining that can still be marketed (including at transmission-storage interface points and transmission-LNG terminal interface points) that could contribute to congestion during the 2025-2026 gas winter.

Point	Direction	Marketable firm capacity (GWh/day/month)	
		December 2025	January 2026 to March 2026
Pirineos	Input	93	117
Oltingue	Exit	20	26

Table 2. Firm marketable capacity as of October 29, 2025

6. Preliminary guidelines from the CRE

In light of the above analysis, the CRE is currently considering the following for the 2025-2026 gas winter:

1. to suspend the marketing of firm monthly capacity for December 2025, January, February, and March 2026 at the Pirineos entry point. Marketing of firm monthly capacity may resume during the winter depending on how the risk of congestion evolves;
2. to suspend the marketing of monthly firm capacity at the Oltingue exit PIR, subject to confirmation by the Italian, Swiss, and German authorities that this measure will not affect the security of supply in their countries;

3. to maintain the marketing of all interruptible capacity products (quarterly, monthly, and daily) at the Pirineos entry PIR. Entry capacity at Pirineos that cannot be marketed as firm capacity may be marketed as interruptible capacity;
4. to maintain the marketing of firm daily capacities at the Pirineos entry PIR and Oltingue exit PIR.

The auction schedule for the marketing of capacity is governed by the provisions of the CAM code¹⁶, which stipulates that the auction for the sale of monthly firm capacity for December 2025 will take place on November 17, 2025. The CRE is therefore required to gather the opinions of market participants within a limited time frame.

Question 1: Are you in favor of the CRE's proposal to suspend the marketing of monthly firm capacity at Pirineos for the months of December 2025 to March 2026?

Question 2: Are you in favor of the CRE's proposal to suspend the marketing of monthly firm exit capacity at Oltingue for the months of December 2025 to March 2026, provided that the Italian, Swiss, and German authorities confirm that their countries' security of supply will not be affected by this measure?

Question 3: Are you in favor of continuing to market available interruptible capacity at the Pirineos entry point?

Question 4: Are you in favor of continuing to market firm daily entry capacity at the Pirineos point and exit capacity at the Oltingue point?

Question 5: Do you have any proposals other than those mentioned in this public consultation to limit the risk of congestion during the 2025-2026 gas winter? If so, please provide an analysis of the advantages and disadvantages of your proposals.

¹⁶ [Commission Regulation \(EU\) 2017/459 of March 16, 2017, establishing a network code on capacity allocation mechanisms in gas transmission systems and repealing Regulation \(EU\) No. 984/2013.](#)