



Consultation document on the joint special capacity product "Route 2" offered by the gas transmission system operators of the Republic of Greece - DESFA SA , the Republic of Bulgaria – Bulgartransgaz EAD, the Republic of Romania – Transgaz SA, the Republic of Moldova – VestMoldTransgaz SRS and the Republic of Ukraine – Gas TSO of Ukraine, as well as by the operator of the interconnection gas pipeline Greece - Bulgaria - ICGB AD, respectively of a special capacity product "Route 3" by the gas transmission network operators of the Republic of Bulgaria - Bulgartransgaz EAD, the Republic of Romania - Transgaz SA, the Republic of Moldova - VestMoldTransgaz SRS and the Republic of Ukraine - Gas TSO of Ukraine, as well as by the operator of the interconnection gas pipeline Greece - Bulgaria - ICGB AD

The gas transmission system operators of the Republic of Greece – DESFA SA, the Republic of Bulgaria – Bulgartransgaz EAD, the Republic of Romania – Transgaz SA, the Republic of Moldova – VestMoldTransgaz SRS and the Republic of Ukraine – Gas TSO of Ukraine, as well as the operator of the interconnection gas pipeline Greece - Bulgaria - ICGB AD, have made a joint proposal to the regulatory authorities of the mentioned countries to approve the provision of a special capacity product "Route 2" in order to effectively cover the needs of the Republic of Ukraine for natural gas, given the upcoming winter. A similar request was made by the gas transmission network operators of the Republic of Bulgaria - Bulgartransgaz EAD, the Republic of Romania - Transgaz SA, the Republic of Moldova - VestMoldTransgaz SRS, the Republic of Ukraine - Gas TSO of Ukraine, as well as the operator of the interconnection gas pipeline between the Republic of Greece and the Republic of Bulgaria - ICGB AD, regarding the special capacity product "Route 3".

I. The special capacity product "Route 2" is for firm capacity, with a monthly duration, for booking capacity at the interconnection points (IPs) through the Trans-Balkan Gas Pipeline, namely: IP Amfitríti (entry point of the LNG storage and regasification terminal in Alexandroupolis, Greece), IP Komotini (DESFA/IGB), IP Stara Zagora, IP Negru Voda/Kardam, IP Isaccea/Orlovka, IP Kaushany/Grebenyky, respectively the special capacity product "Route 3" - IP Komotini (TAP/IGB), IP Stara Zagora, IP Negru Voda/Kardam, IP Isaccea/Orlovka, IP Kaushany/Grebenyky, in the direction from Greece to Ukraine.

The gas transmission system operators justify the need to jointly offer the special capacity products "Route 2" and "Route 3", indicating that, in accordance with the European Commission's REPowerEU Plan for phasing out imports of Russian fossil fuels, their cooperation and coordinated actions are aimed at creating conditions and facilitating the process of phasing out Russian gas, ensuring real opportunities for natural gas supplies to the Republic of Ukraine in order to meet the country's urgent import needs and fill gas storage facilities before the start of the winter season. The operators indicate that the Ukrainian gas infrastructure is of historical key importance for ensuring Europe's energy security, and that after the ceasing the transit of Russian natural gas through the Republic of Ukraine, the Ukrainian underground gas storage facilities are almost empty. In this regard, they point out that the security of supplies for consumers and the preparation of the Republic of Ukraine for the next winter season require the injection of significant natural gas quantities into Ukrainian underground gas storage facilities - approximately 5 billion cubic meters. The operators also point out that due to the reduced domestic production of natural gas by 20% and the limited ability to provide the necessary

quantities for the functioning of the gas system and satisfying national consumption, it is necessary, in view of diversification of sources and security of supplies, for the Republic of Ukraine to be supplied with significant quantities of natural gas via various routes as soon as possible.

In view of the above, the operators consider that due to the strategic location of the Trans-Balkan route, it has the potential to provide natural gas for the urgent needs of the Republic of Ukraine, as well as access to LNG sources. In addition, the operators point out that for users willing to book capacity for natural gas transportation to Ukraine through the Trans-Balkan route, there is increased uncertainty in booking the necessary capacity, due to the risk of not being able to provide the required level of reserved capacity at all IPs along the route. In addition, these users should participate in several capacity booking auctions simultaneously in order to be able to book at each interconnection point along the Trans-Balkan route, and in some cases this capacity is offered as unbundled.

II . The special capacity product "Route 2" has the following characteristics:

1. The operators propose to provide it in the months of December 2025, January, February, March and April 2026.

2. Conditions for participation in the capacity allocation auctions for each IP on the route with entry IP Amfitriti, IP Komotini, IP Stara Zagora, IP Negru Voda/Kardam, IP Isaccea/Orlovka, IP Kaushany/Grebenyky, in accordance with Commission Regulation (EU) 2017/459 of 16 March 2017 establishing a Network Code on capacity allocation mechanisms in gas transmission systems and repealing Regulation (EU) No 984/2013 (Regulation (EU) 2017/459).

3. Through a single monthly auction, equal capacity is allocated along the route with entry IP Amfitriti, IP Komotini, IP Stara Zagora, IP Negru Voda/Kardam, IP Isaccea/Orlovka, IP Kaushany/Grebenyky, for the specific month in competition with special product "Route 1" and special product "Route 3", which will be held on the Regional Booking Platform (RBP). The auctions will be held on the fourth Monday of the month preceding the month in which the capacity product will be provided. In case one or more rolling monthly capacity auctions for the allocation of capacity at specified interconnection points have not been completed by the fourth Monday of a month, the capacity auction (product "Route 2") shall be cancelled.

4. Provision of capacity on each side of all relevant interconnection points along the route with IP Amfitriti entry and Grebenyky exit without providing access to virtual trading points or national exit points in the Republic of Greece, the Republic of Bulgaria, the Republic of Romania and the Republic of Moldova.

5. Implementation of the Uniform Price Algorithm as provided for in Article 18 of Regulation (EU) 2017/459. The amount of capacity to be auctioned during each month shall be determined by the rule of the minimum available capacity at any of the specified interconnection points, and it shall be after the completion of the corresponding rolling monthly auction in accordance with Article 13 of Regulation (EU) 2017/459 for the same month, taking into account the restrictions of competition in the IP on the route related to the special capacity product "Route 1" and the special capacity product "Route 3". If the monthly capacity to be sold in the auction is zero, the capacity allocation auction for the special capacity product "Route 2" shall be cancelled. Due to the restriction on access to the virtual trading points and national exit points of the Republic of Greece, the Republic of Bulgaria, the Republic of Romania and the Republic of Moldova, the price for booking capacity at the auction is equal to the sum of the starting price of each operator for the respective current monthly auction, reduced by 25% for IP Amfitriti (entry), IP Komotini (exit), IP Stara Zagora (entry), IP Negru Voda/Kardam (exit), respectively reduced by 50% for IP Negru Voda/Kardam (entry), IP Isaccea/Orlovka (exit), IP Kaushany (entry) and Grebenyky (exit), respectively reduced by 46% for IP Komotini (entry), IP Stara Zagora (exit), IP Isaccea/Orlovka (entry), IP Kaushany (exit) and Grebenyky (entry) or a discount of 25% of the price of Bulgartransgaz EAD and DESFA SA, a discount of 50% of the price of Transgaz SA and VestMoldTransgaz SRS and a discount of 46% of the price of ICGB AD and Gas TSO of Ukraine.

6. Persons who have reserved capacity under the special product "Route 2" submit applications/correction applications to all six operators, namely: of the interconnection gas pipeline Greece - Bulgaria (IGB) - ICGB AD, Bulgaria - "Bulgartransgaz" EAD, Greece - DESFA SA, Romania - Transgaz SA, Moldova - VestMoldTransgaz SRS and Ukraine - Gas TSO of Ukraine, in accordance with the procedure and under the conditions of Chapter IV "Applications" of Commission Regulation (EU) No. 312/2014 of 26 March 2014 establishing a network code for balancing the gas transmission networks and the regulatory framework applicable in each IP. In case, before the deadline for submitting daily requests and corrective requests, a user who has reserved capacity for natural gas transmission on the Trans-Balkan route to the Republic of Ukraine wishes to change the quantity of natural gas to be transported, the user shall send an email to the gas transmission network operators, indicating the quantity of natural gas to be transported on his behalf from the Republic of Greece to the Republic of Ukraine within the special capacity product "Route 2". In case of discrepancy, the gas transmission network operators will apply the "smaller quantity" rule between the IPs on "Route 2".

III. The special capacity product "Route 3" has the following characteristics:

1. The operators propose to provide it in the months of December 2025, January, February, March and April 2026.

2. Conditions for participation in the capacity allocation auctions for each IP on the route with entry IP Komotini (TAP/IGB), IP Stara Zagora, IP Negru Voda/Kardam, IP Isaccea/Orlovka, IP Kaushany/Grebenyky, in accordance with Commission Regulation (EU) 2017/459.

3. Through a single monthly auction, equal capacity is allocated along the route with entry IP Komotini (TAP/IGB), IP Stara Zagora, IP Negru Voda/Kardam, IP Isaccea/Orlovka, IP Kaushany/Grebenyky, for the specific month in competition with special product "Route 1" and special product "Route 2", which will be held on the Regional Booking Platform (RBP). The auctions will be held on the fourth Monday of the month preceding the month in which the capacity product will be provided. In case one or more rolling monthly capacity auctions for the allocation of capacity at specified interconnection points have not been completed by the fourth Monday of a month, the capacity auction (product "Route 3") shall be cancelled.

4. Provision of capacity on each side of all relevant interconnection points along the route with IP Komotini (TAP/IGB) entry and Grebenyky exit without providing access to virtual trading points or national exit points in the Republic of Greece, the Republic of Bulgaria, the Republic of Romania and the Republic of Moldova.

5. Implementation of the Uniform Price Algorithm as provided for in Article 18 of Regulation (EU) 2017/459. The amount of capacity to be auctioned during each month shall be determined by the rule of the minimum available capacity at any of the specified interconnection points, and it shall be after the completion of the corresponding rolling monthly auction in accordance with Article 13 of Regulation (EU) 2017/459 for the same month, taking into account the restrictions of competition in the IP on the route related to the special capacity product "Route 1" and the special capacity product "Route 2". If the monthly capacity to be sold in the auction is zero, the capacity allocation auction for the special capacity product "Route 3" shall be cancelled. Due to the restriction on access to the virtual trading points and national exit points of the Republic of Greece, the Republic of Bulgaria, the Republic of Romania and the Republic of Moldova, the price for booking capacity at the auction is equal to the sum of the starting price of each operator for the respective current monthly auction, reduced by 25% for IP Stara Zagora (entry), IP Negru Voda/Kardam (exit), respectively reduced by 50% for IP Negru Voda/Kardam (entry), IP Isaccea/Orlovka (exit), IP Kaushany (entry) and Grebenyky (exit), respectively reduced by 46% for IP Komotini – TAP/IGB (entry), IP Stara Zagora (exit), IP Isaccea/Orlovka (entry), IP Kaushany (exit) and Grebeniki (entry) or a discount of 25% of the price of Bulgartransgaz EAD and DESFA SA, a discount of 50% of the price of Transgaz SA and VestMoldTransgaz SRS and a discount of 46% of the price of ICGB AD and Gas TSO of Ukraine.

6. Persons who have reserved capacity under the special product "Route 3" submit

applications/correction applications to all five operators, namely: of the interconnection gas pipeline Greece - Bulgaria (IGB) - ICGB AD, Bulgaria - "Bulgartransgaz" EAD, Greece - DESFA SA, Romania - Transgaz SA, Moldova - VestMoldTransgaz SRS and Ukraine - Gas TSO of Ukraine, in accordance with the procedure and under the conditions of Chapter IV "Applications" of Commission Regulation (EU) No. 312/2014 of 26 March 2014 establishing a network code for balancing the gas transmission networks and the regulatory framework applicable in each IP. In case, before the deadline for submitting daily requests and corrective requests, a user who has reserved capacity for natural gas transmission on the Trans-Balkan route to the Republic of Ukraine wishes to change the quantity of natural gas to be transported, the user shall send an email to the gas transmission network operators, indicating the quantity of natural gas to be transported on his behalf from the Republic of Greece to the Republic of Ukraine within the special capacity product "Route 3". In case of discrepancy, the gas transmission network operators will apply the "smaller quantity" rule between the IPs on "Route 3".

IV. The joint proposal to the regulatory authorities, submitted by letter reg. № E-12-00-249 of 11.11.2025 of the gas transmission system operators of the Republic of Greece, the Republic of Bulgaria, the Republic of Romania, the Republic of Moldova and the Republic of Ukraine, within the framework of the initiative to offer a special capacity products "Route 2" and "Route 3", in order to effectively cover the needs of the Republic of Ukraine for natural gas in view of the upcoming winter, is available [here](#).

V. The consultation will last until 05.12.2025, during which time interested parties may submit opinions to the Energy and Water Regulatory Commission.

This Consultation document has been adopted by the Energy and Water Regulatory Commission with a decision under Protocol № 327 of 21.11.2025, item 1.