



**Consultation document on the joint special capacity product "Route 1" 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 SRL and the Republic of Ukraine – Gas TSO of Ukraine**

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 SRL and the Republic of Ukraine – Gas TSO of Ukraine jointly offer at the monthly capacity booking auctions held on the Regional Booking Platform, a special capacity product "Route 1" in order to effectively cover the natural gas needs of the Republic of Ukraine, given the upcoming winter.

**I.** The special capacity product "Route 1" is for firm capacity, with a monthly duration, for booking capacity at the interconnection points (IPs) through the Trans-Balkan Gas Pipeline, namely: IP Kulata/Sidirokastro, 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 product "Route 1", 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 by October 2025 - 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 transmission 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 1" has the following characteristics:

**1.** On the route with Kulata/Sidirokastro entry and Grebenyky exit, allocation of firm capacity in IP Kulata/Sidirokastro, IP Negru Voda/Kardam, IP Isaccea/Orlovka and IP Kaushany and Grebenyky through a single auction, which will be held on the Regional Booking Platform (RBP) - the platform on which the capacity of the specified IPs is booked under 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). The auctions will be held one week after the start of the current monthly capacity auction, as provided for in Article 13 of Regulation (EU) 2017/459. 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 1") shall be cancelled.

**2.** Provision of capacity on each side of all relevant interconnection points along the route with Kulata/Sidirokastro 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.

**3.** 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. The reserve price of the auction shall be equal to the starting price of the corresponding monthly auction, reduced by 25%.

**III.** The special capacity product "Route 1" will be offered jointly by the gas transmission system operators for the months of June, July, August, September and October 2025.

**IV.** The joint proposal to the regulatory authorities, submitted by letter reg. № E-15-45-17 of 19.05.2025 of the gas transmission system 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 product "Route 1", 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 27.08.2025, during which time interested parties may submit opinions to the Energy and Water Regulatory Commission.

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