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the highlights...

ENERGY MARKETS

EU/ ACER - CEER: 2016 Annual Market Monitoring Reports: On 6 October 2017, the ACER-CEER jointly published the 2016 Wholesale Market Monitoring Reports. The Annual Reports on the Results of Monitoring the Internal Electricity and Natural Gas Markets consist of four volumes: Gas Wholesale Market Volume; Electricity Wholesale Market Volume; Electricity and Gas Retail Volume; and Consumer Protection and Empowerment Volume.

ELECTRICITY

EU: Regulation (EU) 2017/1485 Guideline on TSO: On 2 August 2017, the European Commission issued Regulation no. 2017/1485 establishing a guideline on electricity transmission system operation, which was published in the Official Journal of the European Union L 220/1 as of 25 August 2017. With increasing interconnection between TSOs, this System Operations Guideline provides a set of rules and regulations governing the system operations, and particularly Operational Security, Operational Planning and Scheduling, Load Frequency Control and Reserves.

OIL & GAS

EU/ France: Conseil d' État Decision on Regulated Tariffs of Gas Supply: The French Supreme Administrative Court Conseil d'État judged by its Decision no.370321 that the public service obligation (PSO) of supplying natural gas at regulated tariffs in France breaches EU law. More precisely, it affirmed that no general economic interest objective justifies the French legislation on regulated tariffs for the sale of natural gas.

INFRASTRUCTURE

EU/ENTSO-E and ENTSG: Consultations on Joint TYNDP 2018 Scenario Report and Mid-term Adequacy Forecast 2017: On 2 October 2017, the European Networks of Transmission System Operators for Electricity (ENTSO-E) and Gas (ENTSG) launched a public consultation on their joint draft TYNDP 2018 Scenario Report. The main objective of the consultation is to gather stakeholders' feedback in regard to a set of scenarios, elaborated by ENTSO-E and ENTSG with due account of the input received from the stakeholders, non-governmental organisations, National Regulatory Authorities and Member States. Moreover, on 2 October 2017, ENTSO-E issued for public consultation a new edition of the Midterm Adequacy Forecast (MAF) 2017, which is a state-of-the-art pan-European mathematical analysis of security of electricity supply up to 2020 and 2025.

COMPETITION - STATE AID

EU/C-329/15: CJEU Rules on the Obligation to Purchase Electricity Produced by Cogeneration in Poland: On 13 September 2017, the Court of Justice of the EU (CJEU) issued its decision on case C-329/15, following a request for a preliminary ruling submitted by the Supreme Court of Poland in the context of a dispute between ENEA and the president of the Office for the regulation of energy (URE). The object of the dispute in the main proceedings was the imposition of a financial penalty on ENEA by the URE for breach of its obligation to purchase a certain quota (15% for the year 2006) of electricity produced by cogeneration with the production of heat from energy sources connected to the network and situated in the Republic of Poland.

ENERGY MARKETS highlight...

EU/ ACER - CEER: 2016 Annual Market Monitoring Reports

by Maria Cheimona, (Athens)



On 6 October 2017, the ACER-CEER jointly published the 2016 Wholesale Market Monitoring Reports (MMR). The Annual Reports on the Results of Monitoring the Internal Electricity and Natural Gas Markets consist of four volumes: Gas Wholesale Market Volume; Electricity Wholesale Market Volume; Electricity and Gas Retail Volume; and Consumer Protection and Empowerment Volume.

The Gas Wholesale report shows that gas markets are working better regarding the price and functioning, however, important barriers still remain, particularly in the region of South-East Europe. A positive impact is the implemented gas network codes, although the effects of market fundamentals still prevail. The proper implementation of Network Codes is essential for promoting competition by guaranteeing fairer network access and transparent operation rules. The assessment of EU gas market reveals an overall gradual improvement in the 2013–2016 periods, although further progress towards more liquid and competitive markets is required.

The presence of financial traders on hubs is essential to foster forward liquidity. Thus, relevant authorities should make a clear distinction between supply and pure wholesale trading activities to attract financial tenders. Finally, TSOs should complete the implementation of the Network Codes in all the Member States timely and properly, by setting rules to facilitate the transfer of capacity between network users, in order to achieve more market-based provisions.

The Electricity Wholesale volume stresses that when it comes to further electricity market integration one of the most significant barriers is the limited amount of cross-zonal capacity made available for trading by TSOs. In particular, cross-zonal exchanges are discriminated against internal (intra-zonal) ones, limiting the cross-border capacity available for trade. In both electricity and gas wholesale prices, a downward trend was observed, extended also to electricity household prices. The report presents measures that shall apply in order to achieve increase of commercial capacity. In particular, NRAs and TSOs should ensure the effective and rapid implementation of all legal provision related to TSO coordination and flow-based (FB) capacity calculation.

Regarding retail energy markets, consumer protection and empowerment, both electricity and gas retail prices fell on average for both household and industrial consumers throughout the EU in 2016, compared to 2015. The report also covers the Energy Community Contracting Parties for some retail and gas wholesale topics, thanks to the support and cooperation of the Energy Community Secretariat. Industrial electricity and gas prices in these countries tend to be higher than household prices, with an upward trend for households and a downward one for industrial consumers. From an EU-wide perspective, approximately 25% of household consumers are equipped with electricity smart meters, while, for gas, the use of smart meters remains negligible.

The results of the MMR were presented at the CEER premises in Brussels on 24 October 2017.

Electricity what's new...

EU/ CEER: Report on Power Losses

by Theodoros Theodorou, (Athens)

On 18 October 2017, the Council of European Energy Regulatory (CEER) released a report on power losses across EU. This report provides an overview of power losses (transmission and distribution) on electricity grids, the levels of losses, how they are defined, calculated and valued across 27 EU Member States. It also provides essential information about technical and non-technical losses, losses in transmission and distribution systems and procurement of losses. Furthermore, it includes case studies on the regulatory treatment of losses and the impact of smart meters and distributed generation on network losses. Its primary focus is on reducing of power losses and thus contributing to greater energy efficiency and security of supply for both industries and consumers. In order to achieve this purpose, this report contains a set of recommendations aiming at better benchmarks and reduction of technical and non-technical losses, based on the results of questionnaires sent to EU National Regulatory Authorities (NRAs) and stakeholders.

BiH: Rules for Additional Cross-Border Capacity Approved

by Nebojsa Milanovic, (Banja Luka)

On 14 September 2017, upon the proposal of the Independent System Operator (ISO), the Bosnia and Herzegovina's Regulatory Commission for Electricity adopted the Decision on approval of the Rules for additional cross-border transfer capacity. The Decision regulates: Harmonized rules for granting long-term transfer rights pursuant to Article 51 of the Regulation Commission (EU) 2016/1719 on the establishment of guidelines for Long-term allocation of capacity; Granting of the long-term rights of transfer at the borders the trading zone served by the Coordinated Auction Office in South East Europe (SEE CAO); Rules for an explicit daily allocation of transmission capacities at the borders of the trading zone served by SEE CAO; Agreement on participation, between the SEE CAO and registered participants (Awarding platform); Financial requirements for participating in procedures organized by the Awarding Platform in accordance with Agreement on participation; SEE CAO nomination rules; and Rules on the SEE CAO information system.

Greece: Further Amendments to NOME Auction Rules

by Mira Todorovic Symeonides, (Athens)

On 27 September 2017, the Energy Regulatory Authority (RAE) launched a public consultation, which lasted until 4 October 2017, on the amendments of the Code on Term Electricity Products Auctions (NOME Code) in regards with: a) prohibiting participation of suppliers and traders who failed to supply certain minimum portions of the electricity purchased at NOME auctions to their Greek consumers, and b) limitation to the use of "all or nothing" clause. On 9 October, RAE issued Decision 850/2017 (OJ B'3659/2017) which introduced the following two main amendments of the NOME Code and the auction rules: a) prohibits participation at the auctions to participants who failed, during the previous three months before the respective auction, to realize the purchase of electricity from the NOME auctions above the certain quantity named "the Regulated Proportion of Use the Committed NOME Products". Such Regulated Proportion has, by the above decision, been determined to be 30% for 2017, 50% for the first six months of 2018 and 70% of the quantities of the forward annual produced purchased at the NOME auctions, for the second six months of 2018, with the exception of new entrants to the market for which the Regulated Proportion for 2018 is 30%; and b) reinstalls the use of the "all or nothing" option but with compulsory increase in a new offer, submitted after the use of the option, of requested price or quantities in comparison with previous offer of such participant.

On 18 October 2017, RAE published on its website the comments submitted by twelve (12) participants including three associations: the Association of the Greek Suppliers and Traders (ESEPIE), the Association of the Industrial Electricity Consumers (EBIKEN) and the Association of the Greek Independent Electricity Companies (ESAI). Also, on 18 October 2017, the Electricity Market Operator (LAGIE) published on its website the amended version of the NOME Code (version no. 1.4). The forth 2017 auction 2017A04, initially scheduled for 18 October 2017, was postponed by LAGIE for 25 October 2017. On 17 October 2017, RAE issued Decision 870/2017 (OJ B' 3728/23.10.2017) launching the auction and approving the new rules.



Greece: Greece-Italy TSOs Proposal of Common Capacity Calculation Methodology

by Mira Todorovic Symeonides, (Athens)

On 18 October 2017, the Energy Regulatory Authority (RAE) launched a public consultation, which will last until 17 November 2017, on the Greece-Italy TSOs proposal of common capacity calculation methodology for the day-ahead and intraday market timeframe in accordance with Article 21 of the Commission Regulation (EU) 2015/1222 of 24 July 2015 establishing a guideline on capacity allocation and congestion management (CACM Regulation). The document is a common proposal developed by all TSOs within the Greece-Italy Capacity Calculation Region (GRIT Region). Within six (6) months from the approval of this methodology the TSOs of the GRIT Region should compute the reliability margin for the capacity calculation performed in Day 2 and Day 1 before the day of delivery; while no later than twelve (12) months after the approval of the methodology they should submit a Reliability Margin Study to the National Regulatory Authorities (NRAs) of the GRIT Region. The TSOs of GRIT Region should review the list of critical network elements to be monitored in the capacity calculation process at least once a year, while Terna (the Italian TSO) shall perform dynamic assessments in order to detect possible additional limitations to be applied to the maximum net transmission capacity for each Internal Italian border at least once a year and shall inform the Italian NRA accordingly. The consultation documents consist of the Draft Methodology and the Explanatory Note of the Coordinated NTC methodology for GRIT Region.



Serbia/ Croatia: Public Consultation on the Rules for Explicit Capacity Allocation

by Mirjana Mladenovic, (Belgrade)

On 15 September 2017, the Joint Allocation Office (JAO) launched a public consultation on the Rules for explicit Daily Capacity Allocation on Bidding Zone border Croatia-Serbia (Allocation Rules) and the Border Specific Annex for the Bidding Zone border Croatia – Serbia to the Harmonised Allocation Rules for long-term transmission rights (Annex). The Allocation Rules regulates: (i) the rights and obligations of Registered Participants (market participants who have entered into a Participation Agreement with the Allocation Platform) (ii) the requirements for participation in Auctions (iii) the process of Auction, including the determination of Marginal Price as a result of Auction and the processes for curtailment of Daily Transmission Rights, and (iv) invoicing/payment. As for the Annex, its purposes is to apply the Harmonized Allocation Rules for long-term transmission rights (as amended by the Annex) to the Bidding Zone border Croatia-Serbia, i.e. to the Bidding Zone border between Croatian Transmission System Operator Ltd. and EMS AD Beograd. The rules described in the Annex are governed by the applicable EU legislation law or by applicable legal acts of Energy Community, and/or applicable national legislation. The Public Consultation lasted until 12 October 2017.

Ukraine: Ukrenergo Publishes a TYNDP for 2018-2027 and a Report on Compliance Assessment of Generating Facilities

by Tetyana Vyshnevskaya, (Kiev)

On 9 October 2017, the electricity Transmission System Operator (TSO) SE NPC Ukrenergo published on its website a draft Ten Year Network Development Plan (TYNDP) for 2018-2027 and a draft Report on Compliance (Sufficiency) Assessment of Generating Facilities (the Report), prepared in accordance with the requirements of the Electricity Market Law (No. 2019-VIII of 13 April 2017) and the best European practices. The Report (drafted for the first time) provides an overview of the prospective balances of the capacity and electricity in the Unified Energy System of Ukraine (UESU) for a short, medium and long term, with due account of the structural, economic, market and environmental conditions, introduction of the demand response and energy efficiency measures, and compliance with operational security standards. The TYNDP is based on the Report as well as development plans of adjacent electricity transmission and distribution systems, and provides information on the measures ensuring the security of electricity supply as well as information on the construction and/or reconstruction of objects of the electricity transmission system in the following decade and relevant investments. It reiterates the integration with the European energy system (ENTSO-E) as the main objective and focuses on the future network development which factors in the world trends and objectives of the Energy Strategy of Ukraine (the growing share of renewables in the energy mix, implementation of smart grids etc.). Interested stakeholders may submit their comments and suggestions concerning the published documents to the TSO's subdivision "Research & Design Centre for Development of the UESU". The TYNDP and the Report are subject to approval of the National Energy and Utilities Regulatory Commission.

ELECTRICITY highlight...

EU: Regulation (EU) 2017/1485 Guideline on TSO

by Mira Todorovic Symeonides, (Athens)

On 2 August 2017, the European Commission issued Regulation no. 2017/1485 establishing a guideline on electricity transmission system operation, which was published in the Official Journal of the European Union L 220/1 as of 25 August 2017. As the EU's electricity networks are currently operating according to their national rules, harmonised with the Regulation no. 714/2009, in order to increase the integration of the EU electricity markets and particularly the efficient use of cross-border interconnection between Member States (MSs), as well as to provide for more secure and reliable electricity system, the common set of rules are being adopted through the adoption of the Network Codes. The Codes may, by the subject they regulate, be divided into three groups: i) Connection topics, ii) Operational topics and iii) Market topics.

The Regulation no. 2017/1485 belongs to the second group – Operational topics. With increasing interconnection between TSOs, this System Operations Guideline provides a set of rules and regulations governing the system operations, and particularly Operational Security, Operational Planning and Scheduling, Load Frequency Control and Reserves. The Regulation aims at determining common operational security requirements and principles; common interconnected system operational planning principles; common load-frequency control processes and control structures; and ensuring the conditions for maintaining a frequency quality level of all synchronous areas throughout the EU; promoting the coordination of system operation and operational planning; ensuring and enhancing the transparency and reliability of information on transmission system operation; and contributing to the efficient operation and development of the electricity transmission system and electricity sector in the EU.

TSOs are required by the Regulation to develop the terms and conditions or methodologies which should be approved by the competent regulatory authorities or other entities designed by the MSs. When such terms, conditions or methodologies should be agreed by more than one MSs TSO/s and no consensus is reached, the Regulation provides that the decision would be passed by

the qualified majority of TSOs representing at least 55% of the MSs and comprising at least 65% of the population of the EU, while the blocking minority for such decisions would be TSOs representing at least four MSs. The Regulation provides for concluding agreements with the third country TSOs not bound by this Regulation, if such third countries belong to the same synchronous area with some MSs.

ENTSO-E shall monitor the implementation of this Regulation and each September it shall publish annual reports on the following topics: on operational security indicators, on load-frequency control; and on regional coordination assessment.



In regard to operational security, the Regulation particularly addresses the operational security requirements (system states, remedial actions); data exchange between TSOs, and with DSOs, with owners of interconnectors, with power generating modules connected to transmission and distribution system, and with demand facilities; compliance and training programmes for employees as well as certification of system operation employees in charge of real time operations.

The Regulation came into effect twenty (20) days after its publication, with the exception of the provisions on data exchange which shall apply eighteen (18) months after the entry into force of the Regulation.

Oil & Gas what's new...

EnC: Secretariat Launches Gas Market Integration Report

by *Andriani Kantilieraki, (Athens)*

On 27 September 2017, the Energy Community Secretariat launched a report concerning the evaluation of gas market integration, in the prospect of presenting it before the Energy Community for the Central and South-Eastern European Gas Connectivity (CESEC) High Level Group Meeting, which was held in Bucharest on 28 September 2017. The aforementioned report aims to provide an overview of the latest developments in the gas market and activities towards regional market integration. Thus, the report focuses on crucial subjects such as the implementation of the Third Energy Package especially in regards with the Contracting Parties (namely Albania, Bosnia and Herzegovina, FYRoM, Moldova, Serbia and Ukraine) and the implementation of EU Gas network codes and guidelines as outlined in the Energy Community Gas Action 2020 which deals with the shortcomings of the present gas infrastructure connectivity and market structures. Finally, the report highlights the progress related to interconnection agreements between Contracting Parties' TSOs and other EU Member States as well as the state of the gas interconnector project between Bulgaria and Serbia.

Albania: Supporting Opinion of the EnC Secretariat on the Certification of Albga

by *Odisea Xhelita, (Tirana)*

On 2 October 2017, the Energy Community Secretariat (EnC Secretariat), issued the Opinion no. 4/2017, by which the certification of Albga is supported in line with the Preliminary Decision. Nevertheless, the EnC Secretariat has addressed to ERE the following remarks: a) before issuing the Final Decision, ERE should ensure that the transmission tariff methodology regarding natural gas is adopted, and tariffs for Albga's services are set; b) the Final Decision should provide for the duty of Albga to report on monthly basis to ERE concerning the ongoing procedure for registration of transmission assets, and to conclude the procedure within six (6) months following the adoption of the Final Decision; c) the Final Decision should provide that the company's supervisory board is to be replaced with members not employed in the Ministry or the energy production and/or supply undertakings controlled by the later; d) the Final Decision should include transitional provisions; e) the Final Decision should comprise of the requirement for the full transfer of tasks related to Albga to its sole shareholder Ministry of Finance and Economy (former MZHETTS); f) the Final Decision should elaborate the application of unbundling rules on natural gas and electricity sectors and their implementation in Albania. Pursuant to Article 3 of the Gas Regulation, ERE shall take the utmost account of the above comments of the EnC Secretariat when taking the Final Decision regarding the certification of Albga.



Bulgaria: Bulgartransgaz Approved Three Model Agreements

by *Apostolos Christakoudis, (Sofia)*

On 1 October 2017, the Bulgarian gas TSO, Bulgartransgaz EAD, have approved the amendments to the three model agreements: Contract for access and transmission, Contract for purchase and sale of natural gas for balancing, and Contract for use of the Virtual Commercial Point. The amended agreements will be applied for the year 2017/2018. The amended Contract for access and transmission with the General Conditions and the Contract for purchase and sale of natural gas for balancing will be sent to the users entitled to access to the gas transmission networks of Bulgartransgaz in accordance with the procedure under the Rules for granting of access to gas distribution networks. In order to reserve the capacity in Bulgartransgaz's transmission grids, the users should be registered to the Regional Booking Platform (RBP) in compliance with the RBP operation rules and the respective RBP users' agreements.

Bulgaria: Memorandum on CM Procedures at Interconnection Points

by *Veronika Yordanova, (Sofia)*

On 29 September 2017, the Commission for Energy and Water Regulation issued the Memorandum on congestion management procedures in case of contractual congestion. The procedures apply to the interconnection points with the neighbouring EU Member States. The TSO should promote the optimal use of the capacity by organizing a secondary capacity market. The TSO shall offer the additional capacity (addition to technical capacity) at the relevant interconnection point. The additional capacity is offered when the technical capacity of the relevant point is entirely reserved. It is offered on a day-ahead basis, at a price not lower than the price announced by the TSO which is equal to the TSO's prices for access and transmission for the respective day. If the transfer of all quantities secured by the additional capacity is not possible due to a physical congestion the TSO shall apply the regulated remuneration mechanism. The users of gas transmission networks may offer back to the TSO the capacity they do not intend to use and which the TSO may further redistribute to the other users following the allocation procedures.

Greece: Pre-contractual Audit Approved for Plot 2 in the Ionian Sea

by *Stefania Chatzichristofi, (Athens)*

On 10 October 2017, the Greek Court of Audit completed its pre-contractual audit procedure of granting the exploration and exploitation right of the plot 2 (which is located west of the island of Corfu, in the Ionian Sea), to the selected consortium consisting of the three companies: Hellenic Petroleum (HELPE), Edison and Total. It should be noted that plot 2 was part of the international hydrocarbon exploration tender of 2014. Following this approval, a signing ceremony will take place and further the contract will be submitted to Parliament for ratification.

Greece: Public Consultation on Amendments of the Code for Pricing of the Gas Network

by *Kostis Krimizis, (Athens)*

On 27 September 2017, the Regulatory Authority for Energy (RAE) launched a public consultation regarding the proposed amendments of the Code for the Pricing of the Gas network, which lasted until 5 October 2017. The aim of the proposed amendments are harmonisation with the Regulation (EU) 2017/460 of 16 March 2017 establishing a network code on harmonised transmission tariff structures for gas, as well as establishing a mechanism for prompt adjusting of transmission prices in order to minimise surplus and deficit in the TSOs income in case of unpredictable changes in demand for natural gas, and to distribute the surplus from the period 2006/2016 in compliance with article 61 of the law 4409/2016.



Greece: Consultation on Amendments of the Code for Operation of the Gas Network

by *Kostis Krimizis, (Athens)*

On 5 October 2017, the Regulatory Authority for Energy (RAE) launched a public consultation for the revision of the Code for the Operation of the Gas network, which lasted until 25 October 2017. The amendments were proposed by RAE, Natural gas Distribution System Operator (DEDA), Natural gas supply company of Attica Region (EDA Attikis) and Natural gas supply company of Thessalonica Region. One of the issues discussed is whether auxiliary services shall be compensated by the end user or by the distributor in case of early termination of the contract. A solution proposed is that this issue is regulated between the distributor and the end user. Generally there is a debate whether the relations with end-consumers should be regulated by the Code for the Operation of the Gas Network or a mere publication on the website of the distributor is enough to satisfy the consumer's protection need.

Greece: Public Consultation on Natural Gas Supply Code for Eligible Customers

by Theodoros Theodorou, (Athens)

On 17 October 2017, the Greek Energy Regulatory Authority (RAE) launched a public consultation on the Draft Natural Gas Supply Code for Eligible Customers. This Code is expected to provide extensive regulations of supply of the household and industrial consumers due to the liberalization of the gas markets on 1 January 2018. The public consultation will last until 3 November 2017. Draft Code regulates rights and obligations of suppliers and end consumers, legal entities and natural persons which purchase natural gas for their own use, covering supply contracts negotiation, conclusion and implementation in regard to all supplies, not lonely from the transmission and distribution grid.

Ukraine: Consultation on Amendments concerning Developers of Mineral Resources

by Tetyana Vyshnevskaya, (Kiev)

On 3 October 2017, the Ministry of Ecology and Natural Resources of Ukraine launched a public consultation on amendments to certain normative acts regulating the issuance of special permits for subsurface use and the management of geological information with the view to increase the transparency of the pertaining procedures and thus attract domestic and international investors in exploration and development of mineral resources in Ukraine. In particular, the Ministry proposes: a) a new edition of the Procedure for Management of Geological Information (the updated procedure for the establishment and maintenance of the registry of primary and secondary geological information concerning State and private property, with free access to such information) and b) amendments to the Resolutions of the Cabinet of Ministers of Ukraine No. 594 and No. 615 dated 30 May 2011 approving the Procedure for Auctioning of Special Permits for Subsurface Use and the Procedure for Granting Special Permits for Subsurface Use respectively (the amendments are expected to simplify the

procedures, including by introducing the electronic submission of documents). All the interested stakeholders may provide their feedback to the consultation until 3 November 2017. Subsequently, the final version of the Ministry's proposals shall be submitted for consideration and approval by the Government.



Ukraine: Naftogaz Commences the First Stage of TSO Unbundling

by Tetyana Vyshnevskaya, (Kiev)

On 29 September 2017, PJSC NJSC Naftogaz of Ukraine, which is a gas incumbent and a sole owner of current gas Transmission System Operator (TSO) PJSC Ukrtransgaz, approved the internal reorganization of the latter. Namely, by means of the Shareholder's Decision No. 136 of 29 September 2017 Naftogaz decided on the establishment of an affiliated company of Ukrtransgaz named "Operator

of the Gas Transmission System of Ukraine" (the future gas TSO) and on approval of its Regulations, which determine the purpose, activities, functions, management and other issues concerning the operation of the new company. The unbundling of the current gas TSO is prescribed by the Resolution of the Cabinet of Ministers of Ukraine No. 496 of 1 July 2016 on Unbundling of the Natural Gas Transmission and Storage (Injection and Withdrawal) Activity, and the Naftogaz's decision marks the first step towards its practical implementation.

Ukraine: NEURC Approves Minimum Standards for Natural Gas Supply

by Tetyana Vyshnevskaya, (Kiev)

On 21 September 2017, the National Energy and Utilities Regulatory Commission (NEURC) issued Resolution No. 1156 on Approval of the Minimum Standards and Quality Requirements for Customer Service and Natural Gas Supply, in accordance with the provisions of the Natural Gas Market Law (No. 329-VIII of 9 April 2015). The main objective of the Resolution is to improve customer service and customer protection by determining the minimum quality requirements/standards for natural gas distribution, supply and gas network connection (e.g. the maximum time-limits for execution of repair works, network connection, resumption of gas supply etc.) as well as the amounts of compensation to be paid to customers in case of non-compliance with such requirements/standards. The Resolution came into force on 8 October 2017. Gas distribution system operators and gas supplying companies are required to put up the Resolution on their websites (until 23 October 2017).

OIL & GAS highlight...

EU/ France: Conseil d'État Decision on Regulated Tariffs of Gas Supply

by Stefania Chatzichristofi, (Athens)

On 19 July 2017, the French Supreme Administrative Court Conseil d'État judged by its Decision no.370321 (Decision) that the public service obligation (PSO) of supplying natural gas at regulated tariffs in France breaches EU law. More precisely, it affirmed that no general economic interest objective justifies the French legislation on regulated tariffs for the sale of natural gas. This Decision is important since it paves the way to a fully competitive retail market for the supply of natural gas in France. In particular, in July 2013, the National Association of Retail Energy Companies, in French "ANODE" filed an appeal against the Decree no. 2013-400 of 16 May 2013 on regulated tariffs for the sale of natural gas in France before the Conseil d'État. ANODE argued in particular that the legal basis of the Decree and more precisely Articles L. 445-1 to L. 445-4 of the French Energy Code disregarded the objectives of the common rules for the EU internal market in natural gas, as set out in Directive 2009/73/EC of 13 July 2009 concerning common rules for the internal market in natural gas. This case raised difficulties of interpretation of the EU Directive provisions and the Conseil d'État decided in December 2014, to file two requests to the Court of Justice of the European Union (CJEU) for a preliminary ruling (Case C-121/15). On 7 September 2016, the CJEU responded accordingly to the first request that State intervention in fixing the price of supply of natural gas to the final consumer is an obstacle to achieving a competitive natural gas market, even if such intervention

does not prevent competing offers at prices lower than regulated tariffs. Further, regarding the second question, the CJEU ruled that such State intervention may nevertheless fall within the framework of Directive 2009/73/EC, provided that the following three conditions are fulfilled: the State intervention must: (i) pursue an objective of general economic interest; (ii) comply with the principle of proportionality; and (iii) lay down PSOs that are clearly defined, transparent, non-discriminatory, and verifiable.

Finally, the Decision of 19 July 2017 annulled the aforementioned Decree, without conducting a proportionality test, on the grounds that the imposition of a natural gas tariff regulation infringed EU law since it constitutes restriction to the existence of a competitive common gas market. It was also pointed out that the national legislation failed to fulfil the conditions set by the CJEU ruling. The Conseil d'État concluded that no objective of general economic interest could justify the extent to which the national legislation had hindered the achievement of a competitive natural gas market. In this respect, the Conseil d'État rejected all three of the claimed objectives of general economic interest submitted by the French State, namely: a) security of supply, b) territorial cohesion, and c) reasonable supply prices. The Conseil d'État judged that exceptionally the Decree will cease to apply ex nunc, in light of the legal uncertainty that would be caused to the contracts signed by millions of consumers in compliance with the Decree.



Infrastructure what's new...

EU/ENTSO-E: Call for Submission of Projects for the TYNDP 2018

by Tetyana Vyshnevskya, (Kiev)

On 2 October 2017, the European Network of Transmission System Operators for Electricity (ENTSO-E) opened a window for submission of electricity infrastructure projects to be included in the Union-wide 10-year network development plan (TYNDP 2018), which is a biennial plan intended to assess the needs for the transmission system into and within Europe and the planned development projects submitted by project promoters to address these needs. Alongside the announcement ENTSO-E also published a Practical implementation document for inclusion of transmission and storage projects in the TYNDP 2018, which provides guidance to project promoters on the procedural steps to be taken as well as technical and administrative criteria their projects will have to meet (based on the type of the project promoter, the type of the project and its maturity) and the required documents and information. Interested promoters of electricity transmission and storage projects can apply until 30 November 2017 using the online submission tool. Information on acceptance/rejection of the submitted projects in the TYNDP 2018 will be communicated to the project promoters during January-February 2018 and the final ENTSO-E's decision will be made public in March 2018.

Albania: Regulation on the Approval of Investment Plans of Electricity TSOs and DSOs

by Odisea Xhelita, (Tirana)

On 6 September 2017, the Albanian Energy Regulatory Entity (ERE), by virtue of the Decision no.135/2017, adopted the Procedures for Submission and Approval of the Investment Plans on the Electricity Sector by the Transmission and Distribution System Operators (the Regulation). The Regulation was approved after taking into consideration the comments of the Energy Community Secretariat (EnC Secretariat). Despite the compliance with the applicable law, the investment plans, must also meet the requirements for the protection of life, health, environment and national security, and must be in compliance with the national development strategies on electricity sector. The respective plans should be public, whereas the stakeholders' comments should also be taken into consideration. More precisely, the investment plan submitted by the Transmission System Operator (TSO), should be in compliance with the Network Development Plan of Albania for the next ten (10) years, with the ENTSO-E's Plan the pan-EU TYNDP, and the proposals of the EnC Secretariat. ERE's Decision no.135/2017 came into force on 6 September 2017 and was published in the Official Gazette on 18 September 2017.

Greece: Cooperation Agreement on the LNG Project in Alexandroupolis

by Maria Cheimona, (Athens)



On 12 October 2017, the Greek State-controlled natural gas company DEPA signed a cooperation agreement with the Greek private natural gas company Gastrade, to participate in the development of a Liquefied Natural Gas terminal in Alexandroupolis in northern Greece. Gastrade S.A. is a Greek utility company which studies, designs, develops, operates and exploits natural gas infrastructures. It has obtained the license of the Independent Natural Gas System and is currently developing the LNG Terminal in Alexandroupolis. The Agreement regulates participation of DEPA in the share capital of Gastrade and contains a list of joint undertakings of the Parties

for the further commercial development of the Project. The Project aims at securing of natural gas quantities for the supply of the Greek and the regional SE European markets, offering new sources and routes of natural gas supply, promoting competition, enhancing the security of supply in Greece and the Balkan markets. On 9 February 2017, Gaslog Ltd, an international company, owner, operator and manager of LNG carriers, via a 100% owned affiliate, acquired 20% stake in the share capital of Gastrade.

Greece: Public Consultation on the TYNDP for Gas (2017-2026)

by Evridiki Evangelopoulou, (Thessaloniki)

On 13 October 2017, the Energy Regulatory Authority (RAE) launched a public consultation the Development Plan Program for the National Natural Gas System for the next ten years (TYNDP). The Plan includes the infrastructure projects whose construction is scheduled to take place within the time frame of the Program (2017-2026), regardless of the time of its completion. It is noted that the TSO has already completed the first round of public consultation on its original proposal for the Development Plan. The Consultation will last until 10 November 2017.

INFRASTRUCTURE highlight...

EU/ENTSO-E and ENTSG: Consultations on Joint TYNDP 2018 Scenario Report and Mid-term Adequacy Forecast 2017

by Tetyana Vyshnevskya, (Kiev)

On 2 October 2017, the European Networks of Transmission System Operators for Electricity (ENTSO-E) and Gas (ENTSG) launched a public consultation on their joint draft TYNDP 2018 Scenario Report. The main objective of the consultation is to gather stakeholders' feedback in regard to a set of scenarios, elaborated by ENTSO-E and ENTSOG with due account of the input received from the stakeholders, non-governmental organisations, National Regulatory Authorities and Member States. The TYNDP scenarios outline the potential futures for the electricity and gas systems in Europe, covering the period of 2020-2040 and detailing the electrical load and generation, along with gas demand and supply, within a framework of EU decarbonisation targets and commodity prices. The TYNDP scenarios include a Best Estimate scenario for the short and medium term (for 2020 and 2025), but three storylines for the longer term (2030-2040) to reflect increasing uncertainties: Sustainable Transition (ST), Distributed Generation (DG) and Global Climate Action (GCA). The scenarios may be used to test and assess future electricity and gas infrastructure developments or to analyse future energy policies, market designs and technologies.

In particular: (i) according to the ST scenario, binding emission targets shall be imposed by the national legislation and the climate action will be achieved with a mixture of national regulation, emission trading schemes and subsidies. Gas will play a prominent role in power generation, heating and transport sectors. (ii) In the DG scenario innovation of small-scale generation and residential/commercial storage technologies will be key drivers in climate action. This scenario places prosumers at the centre, provides for a strong Emissions Trading System (ETS) scheme and increasing share of bio fuels. Both electricity and gaseous fuels will be crucial for the transport sector to reach the emission reduction goals. Electric and hybrid heat pumps will play a significant role in the heating sector. Yearly gas demand is expected to decrease in the residential sector and industrial use. (iii) According to the GCA scenario, an efficient ETS is key for the electricity sector's success in contributing to global/EU decarbonisation policy objectives. A CO₂ market price will provide the correct market signals to trigger investments in low-carbon power generation technologies and for flexibility services. Electricity and

natural gas will play an important role in the transport sector, while electric and hybrid heat pumps together with district heating plants will present an efficient solution for the heating sector. Electricity demand will increase in various sectors; natural gas demand will increase in the transport sector, decrease in the residential sector and remain stable in the industrial sector. The consultation will be open until 11 November 2017, and the final version of the report will be issued within three months of the consultation's closure.

Moreover, on 2 October 2017, ENTSO-E issued for public consultation a new edition of the Midterm Adequacy Forecast (MAF) 2017, which is a state-of-the-art pan-European mathematical analysis of security of electricity supply up to 2020 and 2025. The MAF shall assist the stakeholders in making qualified decisions which are driven and affected by the level of adequacy in the European power system, and shall help develop the latter in a reliable, sustainable and connected way. The MAF 2017 takes into account the TYNDP 2018 scenarios and presents, inter alia, the following findings: a) the resource adequacy in 2020 will remain high in most countries, however, severe risk of resource scarcity has been identified in several countries, mainly for islands (Cyprus, Malta, Ireland and Northern Ireland) and, more generally, at the periphery of the simulated countries (e.g. Albania, Bulgaria, Greece and Finland), which confirms the importance of interconnection in helping countries to get support in critical situations; b) the resource adequacy concerns found for 2025 are broadly in line with the ones in the 2020 base case scenario, but the situation will aggravate in the Baltic area, especially in Estonia and Lithuania where several old power plants are assumed to drop out of the system, and in Poland where forecasted demand growth does not correspond with investments needed. That said, the resource adequacy is expected to improve between 2020 and 2025 in Bulgaria (due to the envisaged commissioning of new Combined Cycle Gas Turbine plants) and Northern Ireland (second North-South Interconnector to be commissioned in 2021). In addition, it was also found that power systems adequacy is severely affected by climate conditions, mothballing has a significant impact on adequacy in larger regions and interconnections are crucial for supporting adequacy in large systems. The consultation will close on 10 November 2017.

Competition - State Aid **what's new...**

[EU/SA.45155: Commission Approves Proposed UK Amendment to Reductions for Energy-Intensive Users](#)

by *Viktoria Chatzara, (Athens)*



On 6 October 2017, the European Commission's decision dated 12 June 2017 in the case SA.45155 concerning the amendments contemplated by the United Kingdom to the reductions provided for energy-intensive users (EIU) in connection with additional costs connected to electricity from renewable energy sources (RES), was published in the Official Journal of the European Union. Under the existing Renewable Obligation (RO) scheme, electricity suppliers are obliged to purchase a specific proportion of their supplies from eligible RES, in the form of purchasing specific amounts of RO Certificates. The energy market regulator (Ofgem) issues and administers RO Certificates to RES electricity generators, which in turn sell them to electricity suppliers, thus receiving additional to the wholesale electricity price revenues. The cost of the RO Certificates is ultimately passed-on to the end users. In 2015, the Commission approved a measure consisting in compensation for EIU for certain costs of RES support, in the form of a reduction from the Contract for Difference for Renewables scheme (CfD) and a direct payment for the indirect costs related to the RO and Feed-in Tariffs (FiT). Under the proposed amendments, the compensation for the indirect costs would be changed into an aid based on an exemption of up to 85% of electricity supplied to eligible EIU from the RO obligation, without this affecting the total amount of the aid paid to RES-generators under the above described scheme. According to the information provided by the UK, this reduction will be applicable only to undertakings eligible for

compensation under the already approved measure, whereas a specific method has been described, under which it will be ensured that the RES-generators receive the same amount of aid. The total value of the support for EIU is estimated to be around £179 million per annum over 2017/18 to 2026/27 in 2016 prices. Under the Commission's assessment, as in the previous decision concerning the compensation schemes for EIU, the contemplated measure constitutes State aid. However, said measure is considered to be compatible with the internal market, thus, no objections were raised by the Commission.

[EU/SA.46898: EU Commission Approves French RES Support Schemes](#)

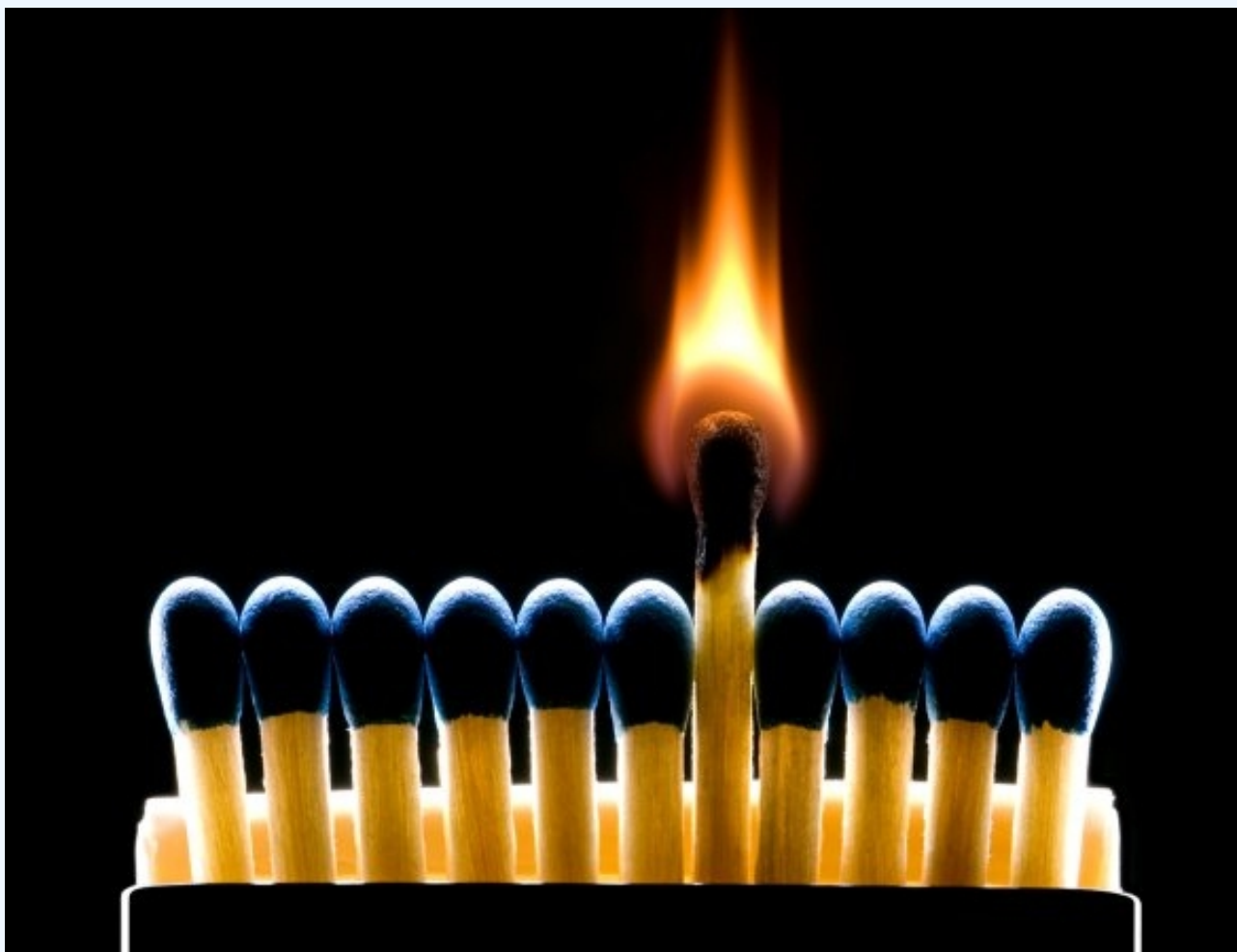
by *Stefania Chatzichristofi, (Athens)*

On 6 October 2017, the Decision of the European Commission in the Case SA 46898 regarding the support scheme for electricity generation installations using biogas produced by methanisation and for electricity generation installations using energy extracted from geothermal deposits was published in the Official Journal of the European Union, while its public version was available following the notification of the letter to France on 7 February 2017. The French authorities had notified the Commission about different projects intended to boost electricity production from RES by granting a feed-in tariff (FiT) or a top-up payment to the following installations, among others: i) the ones using energy extracted from geothermal deposits; ii) the ones of less than 500 kW which use biogas produced by methanisation (i.e. gas produced from agricultural residues and organic waste). The aim of these State aid schemes, which are financed from the 'Energy Transition' account, is to help France meet its RES target as well as to minimize any distortion to competition. The Commission referred to the 2014 Guidelines on State Aid for Environmental protection and Energy, pursuant to which the Member States were allowed to support RES, subject to certain conditions. The Commission concluded that the State aid schemes at hand helped integrate RES producers into the French market in accordance with the Guidelines, only installations of less than 500 kW shall be eligible for the FiT and installations with the capacity equal to or exceeding 500 kW shall receive support in the form of a premium on top of the market price, besides, the measures also include monitoring arrangements to prevent the installations from receiving excessive remuneration. With specific regard to installations using geothermal energy, the Commission has observed that the potential number of projects is too limited to organise a competitive tender. In such cases, the Guidelines allow for the aid to be granted without going through a tender procedure. By its Decision, the European Commission confirmed that the said support scheme is in line with EU State aid rules, and the measure in question will promote the European energy objectives without unduly distorting competition.

EU/SA.47887: Commission Approves German State Aid Scheme

by Viktoria Chatzara, (Athens)

On 6 October 2017, the European Commission's decision dated 23 May 2017 on the reform of the support scheme for combined heat and power generation (CHP) contemplated by Germany, was published in the Official Journal of the European Union. According to the information provided by the German State, the reform aims to further reduce by 4 million tones until 2020 the CO₂ emissions in the electricity sector in Germany. Under the Opening Decision of the Commission on this case, support granted to new, modernized and retrofitted high-efficiency CHP installations, existing gas-fired CHP installations in the district heating sector (until 2019), to new heat/cooling storage facilities or retrofitted storage facilities, and for the construction or expansion of heating/cooling networks, was approved. The support scheme is financed through a CHP surcharge imposed on electricity supplied to end consumers and collected by network operators. Under the amendments proposed by Germany, the CHP surcharge will burden the electricity when it is withdrawn from the storage facility and not when it is fed into the storage facility. Furthermore, with respect to the categories of end consumers, entitled to reduced rates of the CHP surcharge, as of 1 January 2017, i.e. following the proposed amendments, the reductions would be granted only to electro-intensive users, eligible for reductions of the surcharge levied in Germany on electricity, in order to finance support to renewable energy sources (EEG surcharge), provided they fulfil a series of requirements, including, indicatively, that the electricity being subject to the EEG surcharge and that has been used by the undertaking was at least 1 GWh in the last financial year, that the undertaking concerned can be classified at the consumption point concerned in one of the sectors of Annex 4 to the EEG, etc. The German authorities indicated that the undertakings falling into this scope will be mainly active in sectors, such as mining and quarrying except energy producing materials, manufacture of food products, manufacture of beverages, manufacture of textiles, etc. Taking into account all the comments submitted to it, the Commission concluded that the measure in question involves State aid. Nevertheless, after examining all the specific circumstances, the Commission reached the conclusion that the measures at hand are in line with the 2014-2020 Guidelines on State aid for environmental protection and energy and, thus, compliant with the internal market.



COMPETITION - STATE AID highlight...

EU/C-329/15: CJEU Rules on the Obligation to Purchase Electricity Produced by Cogeneration in Poland

by *Viktoria Chatzara, (Athens)*

On 13 September 2017, the Court of Justice of the EU (CJEU) issued its decision on case C-329/15, following a request for a preliminary ruling submitted by the Supreme Court of Poland in the context of a dispute between ENEA and the president of the Office for the regulation of energy (URE). The object of the dispute in the main proceedings was the imposition of a financial penalty on ENEA by the URE for breach of its obligation to purchase a certain quota (15% for the year 2006) of electricity produced by cogeneration with the production of heat from energy sources connected to the network and situated in the Republic of Poland. According to the applicable Polish law provisions, such obligation of electricity supplies was funded by the suppliers' own financial resources, whereas the president of the URE had the power to fix the price of electricity produced by cogeneration at a reasonable level when calculating the maximum price that could be charged to end users, in a way that the additional cost inferred on the electricity suppliers from the above described obligation could not be passed-on to end users. ENEA did not comply with its above described obligation for the year 2006, having as result that a financial penalty was imposed, which it contested before the competent Polish courts. ENEA argued, among others, that the obligation to purchase electricity produced by cogeneration constituted State aid measure, thus a relevant request for preliminary ruling was submitted to the CJEU.

The CJEU, after examining the information submitted to it, assessed whether the obligation constitutes intervention by the State or through State resources, as the referring court's decision made it apparent that the other three conditions for the existence of State aid were considered to be fulfilled. The Court examined firstly whether the measure at hand could be attributed to the Polish State; in this regard, taking into account that obligation at issue in the main proceedings was imposed by means of a law, the Court stated that it could be clearly attributed to the Polish State. With respect to the condition for the existence of intervention by the State or through State resources, the CJEU preliminary pointed out that it is considered to be fulfilled, not only in the event that the aid is granted directly by the State, but also when it is granted by public or private bodies established



or designated by the State with the view to administer the aid, even if there is no direct transfer of State resources. In this relevance, it was further mentioned that a measure is considered to constitute State aid, even if the support does not derive from sums held by the State, provided that they constantly remain under public control. The Court, however, pointed out that at the present case, the measure at hand required electricity suppliers to sell a quota of the electricity produced by cogeneration accounting for at least 15% of their annual electricity sales to end users, whereas any additional costs for the suppliers could not be passed on entirely to end users, nor were they financed by a compulsory contribution imposed by the State or by a fully offset mechanism. To this end, the electricity suppliers cannot be viewed as being appointed by the State to manage a State resource. With respect, moreover, to the fact that ENEA (and most of the electricity suppliers bound by the above obligation) were public undertakings, the Court stated that it did not derive from the facts of the case that the Polish State exercised a dominant influence that enabled it to direct the use of the resources towards the purchase of electricity produced by cogeneration, in which case a use of State resources would be accepted. Taking all the above into account, the CJEU ruled that a national measure, as the one above described, placing an obligation on both private and public undertakings to purchase electricity produced by cogeneration, does not constitute intervention by the State or through State resources, and, thus, does not constitute State aid in the sense of the relevant EU law provisions.

Renewables what's new...

Greece: Institutional Initiatives for the Transition of Islands into Clean Energy Forms

by Evridiki Evangelopoulou, (Thessaloniki)

On 2 October 2017, the Ministry of Environment and Energy published a press release according to which, having as a main strategic goal the transition of the islands to clean energy forms, describes promptly the necessary institutional framework initiatives that need to be taken. More specifically, the proposed initiatives refer to: a) the launch of the hybrid projects of Tilos and Ikaria, b) the implementation of two specific pilot projects on the islands in order to examine the possibility of higher energy penetration and c) the determination of the Licensing Procedure and the Operational Support Framework for the Green Island Project, relating to Ai Stratis.



Energy Efficiency **what's new...**




EU: Changes to Eurostat Rules to Boost Investment in Energy efficiency

by Aleksandar Mladenovic, (Belgrade)

On 19 September 2017, upon initiative of the Member States and in cooperation with their National Statistical Institutes (NSIs), Eurostat published a revised guidance note clarifying certain European system of national accounts' (ESA) 2010 provisions applied to the accounting treatment of energy performance contracts (EPC) and the circumstance in which such contracts can be recorded off government balance sheets. For an EPC to be recorded off government balance sheet, first such EPC contractor must be considered as the economic owner of the assets. In addition the analysis has also to focus on the issues such as the duration of the contract, the existence of factoring operation in the context of the EPC, whether government provides financing or other guarantees to the EPC provider and, more in general, on specific clauses that might distort the distribution of the risks and rewards in an EPC. As a background, under the ESA 2010 investment is recorded as gross fixed capital formation (GFCF), which constitutes expenditure and has an impact on the deficit or surplus of a Member States' budget in case it is recorded on government balance sheet. The possibility of off balance sheet recording can make the use of EPCs more attractive, allowing governments to invest in energy savings while complying with the debt and deficit thresholds established in the Maastricht Treaty.






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