

Energy law headlines from the EU & the SEE countries of the *Rokas* network**EU and EnC****Market**

- EnC: Paper on the Economic and Investment Plan for the Western Balkans

Oil & Gas

- EU: ACER & CEER White Paper on the Regulation of Pure Hydrogen Networks

Competition & State Aid

- Slovakian State Aid Scheme for HE CHP Installations (SA.54318)
- EU: Danish Support Scheme for New Offshore Wind Farm Approved (SA.57858)
- Romanian state aid scheme on district heating system in Bucharest approved. (SA 57425)
- EU: Commission Approves Aid in Battery Value Chain

Energy Efficiency

- EU: New EU energy labels applicable from 1 March 2021

Environment

- EU: New Initiative for Coal Regions in Transition in the Western Balkans and Ukraine

BiH**RES**

- FBiH suspends issuing of licenses for small HPPs
- Completion of the Wind farm Podveležje 1 construction

BULGARIA**Electricity**

- Consultation on Bulgaria's electricity market reform plan

Oil & Gas

- Bulgaria launches EUR 73 million gas interconnector project

GREECE**Electricity**

- Additional Public Consultation on the Process of Changing Electricity Supplier
- Amendments to the Greek Energy Balancing Rulebook

Oil & Gas

- Gas TSO Appointed as Balancing Forecasting Party

Infrastructure

- Approved Preventive Action Plan for the Security of Gas Supply
- RAE Approves 2021-2025 Gas Distribution Network Development for the Rest of Greece
- Intergovernmental Agreement for the IGB Project and EMGF Statute Ratified

RES

- RAE's Decision on Interconnection Terms for Connection to the Network

MONTENEGRO**Oil & Gas**

- The Citizens Decide on Offshore Oil After Exploratory Drilling

ROMANIA**Oil & Gas**

- TRANSGAZ Approved the Financing of the Development Plan in the Period 2020-2029

ALBANIA**Market**

- Approval of the Updated Complaint form of Electricity and Natural Gas Customers

Oil & Gas

- Regulation for Determining the Criteria in Exercising the Activity of Natural Gas Storage
- Conditions for the Licensee Charged with the PSO for the Natural Gas Sector

Environment

- Albania adopts Climate Change Law

SERBIA**Electricity**

- Tariff for the System and Auxiliary Services in the Power System for 2021

Oil & Gas

- Update on Case ECS-13/17 against Serbia

EU and EnC

Market

EnC: Paper on the Economic and Investment Plan for the Western Balkans

By Konstantinos Ntallas (Athens)

On October 2020 the European Commission adopted a comprehensive Economic and Investment Plan for the Western Balkans, which identified initiatives related to green energy and the transition from coal, aiming to spur the long-term economic recovery of the region and to foster regional integration and convergence with the European Union. With an overall budget of EUR 9 billion for its implementation during 2021-2027, a fair share is expected to finance buildings renovation and decarbonisation of heating and cooling sectors.

The Energy Community Secretariat published on 25 February 2021 its Discussion Paper on Riding the Renovation wave in the Western Balkans Proposal for boosting energy efficiency in the residential building sector. In the Discussion Paper, the Secretariat highlights the Renovation Needs and Drives in the Region. More specifically, there is a major need for simplification of the current system of oversight and control of the housing policy implementation, with numerous regulatory bodies and inspectorates that bring little effectiveness. Moreover, a comprehensive assessment and streamlining of legal and regulatory interventions in this field would be needed. Furthermore, four (4) different Drives are mentioned in the Paper, which call for such investments in the Balkans: a) need for decarbonisation, b) multiple benefits of energy efficiency in buildings, c) future legal obligations (i.e. EED, EPBD, REDII and Governance Regulation) and d) the present political momentum.

The Paper also advocates that the success of the Renovation wave is dependant on a holistic approach starting with an enabling legal and regulatory framework, dedicated financing with specific financial products (EU/donor grants, IFIs lending, public finance) and significant technical assistance for project preparation and implementation. For that reason the Secretariat offers its assistance to the Western Balkan Contracting Parties in improving the legal framework and governance and removing regulatory barriers in the building sector, developing effective financing instruments, increasing public awareness, facilitating information sharing and exchange of best practice and serving as a bridge between the providers of technical and financial assistance and beneficiaries.

Oil & Gas

ACER & CEER White Paper on the Regulation of Pure Hydrogen Networks

by Ellie Fenekou (Athens)

European Union Agency for the Cooperation of Energy Regulators (ACER) and the Council of European Energy Regulators (CEER) have jointly issued the first white paper of the “European Green Deal” Regulatory White Paper Series with regard to the European Commission’s strategies on Hydrogen and Energy System Integration. The paper, titled “When and How to Regulate Pure Hydrogen Networks”, was published on their respective websites on 9 February 2021. It addresses the potential regulation of dedicated pure hydrogen networks, in the context of assisting the European Commission in its preparation for future legislation on hydrogen and energy system integration.

ACER and CEER recommend opting for a “gradual approach to the regulation of hydrogen networks in line with market and infrastructure development”. As regards market structure, they explain that regulatory intervention will be needed in case of a structural risk of abuse of dominant position (under the essential facilities doctrine). They also recommend a “dynamic regulatory approach” according to the findings of “periodic market monitoring” by the NRAs on the basis of pre-established EU-wide criteria.

ACER and CEER stress the importance of prior “clarity” with regard to the content of future regulation and circumstances of it being applicable, and propose the suitable adoption of certain regulatory principles already proven as effective in the EU energy market (explicitly: “unbundling, third-party access, transparency, non-discrimination, monitoring and oversight by NRAs and ACER”).

They also advocate that there be timely clarity regarding “temporary regulatory exemptions” for both current and future hydrogen infrastructures operating as business-to-business networks, without prejudice to essential facilities with a risk of abuse of dominant position.

As regards network infrastructure, ACER and CEER propose that, in conjunction with newly constructed hydrogen dedicated infrastructure, suitable gas assets be repurposed to transport hydrogen after the evaluation of each case through cost-benefit analyses (CBAs); they suggest that the National Development Plans (NDPs) of gas network operators point out such assets. In such cases, ACER and CEER recommend the application of “cross-reflectivity” and “accounting unbundling” so that there is no “cross-subsidisation” between the users of the gas and hydrogen networks.

Competition & State Aid

Slovakian State Aid Scheme for HE CHP Installations (SA.54318)

by Viktoria Chatzara (Athens)

On 4 March 2021 the European Commission issued a decision clearing a notified Slovakian state aid measure (under state aid case No. SA.54318), aiming to support high-efficient co-generation heat and power (CHP) production installations that are connected to district heating networks. The objects of the support scheme are three-fold: (a) to increase or maintain high efficiency or existing high-efficient CHP installations, and/ or (b) to incentivise such existing installations to switch from coal to natural gas or renewable resources; and/or (c) to stimulate investments in new high-efficient CHP facilities. According to the details of the proposed scheme, two main categories of beneficiaries were identified: one the one hand new installations with a capacity of 1 MW or higher, and on the other, small installations and existing facilities, while coal-fired installations are not eligible for support. The beneficiaries falling into the first category will be selected via a multi-technology tender procedure, while in relation to the ones pertaining to the second, the aid will be calculated on the basis of the costs of producing electricity (levelised cost of energy). In relation to the aid granted, it will be in the form of a feed-in premium for beneficiaries exceeding 250 kW, and in the form of a fixed feed-in tariff for smaller installations. It is estimated that a total amount of €70 million per year will be granted for a period of 15 years, amounting totally to approximately €1 billion.

The Commission reviewed the notified scheme under the EU state aid rules, including the 2014 Guidelines on State Aid for environmental protection and energy, which allow member states to support high-efficient CHP, provided they meet the high-efficient co-generation criteria set out in the Energy Efficiency Directive. According to the Commission's evaluation of the information provided by Slovakia, the scheme is necessary for the promotion of investments in the high-efficiency co-generation sector, which would not take place without public support, and that it is also proportionate against the objectives set, as the aid is provided through an open competitive process for new large installations, and it is limited as to the small and existing ones. Taking the above into account, the Commission concluded that, as the scheme will support the production of electricity from high-efficient CHP, promoting the EU energy and climate objectives, and without unduly distorting competition, it is in line with the applicable EU state aid law provisions. The non-confidential version of the Commission's decision, providing further details on the design and operation of the scheme, is expected to be published.

EU: Danish Support Scheme for New Offshore Wind Farm Approved (SA.57858)

by Viktoria Chatzara (Athens)

On 23 February 2021, the European Commission issued its decision on a support scheme notified to it by Romania, concerning aid granted for the upgrade of district heating system in the municipality of Bucharest (State Aid case No SA.57425). The scheme provides approximately €254 million of state support for the rehabilitation of the distribution network (the "transmission" pipelines of hot water to the main distribution points) of the district heating system in the urban area of Bucharest. The aid will be granted in the form of direct grants, financed by EU Structural Funds managed by Romania.

The Bucharest's district heating system serves 1.2 million inhabitants, covering around 940 km of thermic pipes of the transmission system and 2,800 km pipes of the distribution system. As far as the support granted to district heating distribution networks is concerned, it may cover up to almost 10% of the overall investment. The aim of the measure is to diminish heat losses, water refill losses, network maintenance costs and contribute to energy savings, reducing greenhouse gas emissions and other pollutants emissions. The support for the construction and/or upgrade of district heating systems is approved in compliance with the Commission's 2014 Guidelines on State aid for environmental protection and energy, and under the conditions that the projects benefited from the aid meet the criteria of "efficient district heating" set by the Energy Efficiency Directive. The Commission decided that the Bucharest system meets the requirements of efficient district heating and cooling system as mentioned above.

The Commission also stated that the aid scheme is necessary, since the projects that will receive the aid would not be carried out without the granted support, and proportionate, considering the rate of return to be delivered by the supported projects. Taking the above into consideration, the Commission concluded that the state aid scheme is compatible with the internal market and the applicable EU state aid rules, due to the amelioration of several environmental problems. The non-confidential version of the Commission's decision is expected to be published in due course.

Romanian state aid scheme on district heating system in Bucharest approved. (SA 57425)

by Agori Michopoulou (Athens)

On 1 March 2021 the European Commission issued a decision clearing a notified Danish state aid measure concerning the new Thor offshore wind farm project, located in the Danish part of the North Sea, and having capacity from 800 MW to 1,000 MW (state aid case No. SA.57858). The non-confidential version of the decision was published in the EU Official Journal on 19 March 2021. The measure aims to support the design, construction and operation of the new offshore wind farm, and its scope includes the offshore wind farm, the offshore substation and the grid connection up to the point of connection in the first onshore substation, with the total amount of the support being equal to approximately €870 million (DKK 6.5 billion). Two onshore substations are provided: one constructed by the concessionaire of the project, and one by the Danish Transmission System Operator (TSO), which will be used as

the point of connection, and is expected to be available to receive first power by 1 January 2025. The project will be awarded through an open competitive tender, and the duration of the aid will be 20 years, in order to ensure that no aid is granted following the depreciation of the wind farm. The aid will take the form of a two-way contract-for-difference premium, paid on top of the market price for electricity, and calculated as the difference between the offered bid price (a fixed amount of DKK/ kWh), and the reference price (the average of the electricity price for the last year, and fixed for 12 months).

Taking into account that electricity generated by offshore wind farm technology is not, under all circumstances, competitive against electricity generated by other, more traditional technologies and that, therefore, the operation of the new Thor offshore wind farm would not be financially viable without public support, the Commission, reviewing the scheme under the applicable EU state aid provisions and, namely, the 2014 Guidelines on state aid for environmental protection and energy, concluded that the aid is necessary and has an incentive effect. Furthermore, the scheme aims to help increase the share of electricity produced from renewable energy sources and the phasing-out coal from electricity production, thus, having positive environmental effects that outweigh any possible negative effects on competition. It was also determined that the aid is proportionate and limited to the minimum necessary. In this, the notified Danish support scheme was considered to be in line with the applicable EU state aid law provisions and the internal market.

EU: Commission Approves Aid in Battery Value Chain

by Dimitrios Mitsakos (Athens)

On 26 January 2021, the European Commission issued a series of decisions on a public support for the project, called “European Battery Innovation” jointly prepared and notified to it by twelve Member States (State Aid cases No. SA 55855 (Austria), SA 55840 (Belgium), SA 55844 (Croatia), SA 55846 (Finland), SA 55858 (France), SA 55831 (Germany), SA 56665 (Greece), SA 55813 (Italy), SA 55859 (Poland), SA 55819 (Slovakia), SA 55896 (Spain) and SA 55854 (Sweden)). By virtue of these decisions, the Commission approved €2.9 billion public funding by those States for the project implementation.

The aim of the abovementioned project, which concerns the second Important Project of Common European Interest (“IPCEI”), is to enhance the development of a whole set of new technological breakthroughs, including different cell chemistries and novel production processes, and other innovations in the battery value chain. It will cover the entire battery value chain from extraction of raw materials, design and manufacturing of battery cells and packs, and finally the recycling and disposal in a circular economy. The overall project is expected to be completed by 2028. Over the coming years, the twelve Member States will provide up to €2.9 billion in public funding, which is expected to unlock an additional €9 billion in private investments.

According to the Commission, the public support for the research and innovation in the battery value chain is permitted in accordance with the EU State aid rules, including the IPCEI Communication, and following the Sustainable Batteries Regulation proposed by the Commission in December 2020. The Commission also stresses the need of the granted aid in order to provide incentives to companies to carry out the investment, since such projects entail significant technological and financial risks. Furthermore, the total planned maximum aid amounts are proportionate, taking into account the eligible costs of those projects and their funding gaps. Finally, it is noted that 42 direct participants will get involved in the proposed project, including small and medium – sized enterprises as well as start-ups with activities in one or more Member States.

Energy Efficiency

EU: New EU energy labels applicable from 1 March 2021

by Pavlos-Ioannis Kasselakis (Athens)

On 1 March 2021, the European Commission rendered its decision on the applicability of a new version of the EU energy label in all shops and online retailers, following a rigorous consultation process, with the involvement of stakeholders, Member States and manufacturers, as well as scrutiny by the Council and the European Parliament. This initiative is being introduced in order to help EU consumers cut their energy bills and carbon footprint, and eventually to *reduce greenhouse gas emissions*.

The new labels will initially apply to four product categories (i.e., fridges and freezers, dishwashers, washing machines and television sets, including external monitors), whilst other products will follow in the coming years, such as light bulbs. In more detail, the most important change is to return to a simpler A-G scale, since increasingly more products achieve ratings over A+, according to the current framework. The A-G scale is stricter, so that fewer products will be able to achieve the “A” rating, leaving space for more efficient products to be introduced in the future.

In addition to the new scaling system and as regards the layout of the new labels (with clearer and more modern icons), a number of new elements will also be included on the labels, such as a QR code, which will enable consumers to find additional information regarding the product model (e.g., data, features and test results). Furthermore, the comparison of similar products will be facilitated, since all appliances on the EU market must be registered in a new EU-wide database, named after European Product Registry for Energy Labels (EPREL).

Apart from the new energy labeling rules, a number of harmonized minimum performance requirements, known as ecodesign, will also come into force as of 1 March 2021, alongside with two horizontal (“omnibus”) regulations so as to correct and clarify a range of

issues identified in the regulatory scheme originally adopted in 2019. More precisely, the ecodesign rules are expected to reinforce consumer rights to repair products and support the circular economy, whilst manufacturers and importers will now be obliged to make a range of essential parts available to professional repairers for at least 7 to 10 years after the last unit of model has been placed on the EU market. The said obligation will also apply as regards end-users, given that manufacturers must make certain spare parts available for several years after a product is taken off the market. It is noted that the maximum delivery time for all these pieces is 15 working days after ordering.

Environment

EU: New Initiative for Coal Regions in Transition in the Western Balkans and Ukraine

by Kosmas Karanikolas (Athens)

On 9 February 2021, the EU Commission proceeded with the establishment of a new Secretariat, based in Brussels, burdened with the task to assist Western Balkan (Bosnia and Herzegovina, Kosovo, Montenegro, North Macedonia and Serbia) and Ukraine regions, which are currently heavily dependent on coal, effectuate a just transition towards a carbon-neutral economy. It is noted that EU's assistance for the decrease and gradual abolition of carbon use as well as the alleviation of the socioeconomic consequences of the transition towards a climate resilient economy in the areas embraced in the said Initiative is considered to be reasonable, given that these territories are adjacent to the EU territory. The formation of the said Secretariat realised and complemented the relevant EU Initiative, launched in December 2020. The Secretariat will be run by a consortium, encompassing various institutions such as *Climate Strategies* and *Wuppertal Institute for Climate, Environment & Energy*, with expert knowledge of the participating countries' state of affairs, while its management is entrusted to the Commission, in collaboration with 5 international institutions, including, among others, the World Bank and EBRD. The said Secretariat is anticipated to create a region-wide, multi-stakeholder forum aimed at the sharing and exchange of experiences, knowledge and best practices on transition-related issues, such as trainings on governance, community engagement, environmental reclamation, and repurposing of land and assets. The Initiative's function is simple; firstly, regions with significant coal mining activities and coal-based energy production are detected (17 such areas have been identified through an initial screening but other carbon dependent areas can decide to participate, as well) and, secondly, as long as the eligible areas decide to exercise their discretion to actively engage in the Initiative, they are furnished access to technical assistance/expert support in order to develop transition roadmaps and are, further, facilitated to finance the relevant transition projects.

GREECE

Electricity

Additional Public Consultation on the Process of Changing Electricity Supplier

by Sofia Getimi (Athens)

On 19 February 2021, the Regulatory Authority for Energy (RAE) announced an additional public consultation on the process of changing electricity supplier and the respective obligations of the supplier and the consumer during that process.

Under the proposed scheme, a consumer may terminate the supply contract and exercise his right to change electricity supplier even when he has unsettled overdue debts, provided that these debts do not exceed, on a quarterly consumption period, 150€ in case of household consumers, 200€ in case of commercial consumers and 1000€ in case of medium voltage (MV) consumers. If the consumer's overdue debts exceed the aforementioned amounts, the consumer may not terminate the supply contract unless he repays the debt in full or settles his debt with his current supplier.

In addition, a debt flagging system is introduced for consumers whose overdue debts either do not exceed the above amounts or have been settled with the supplier and who may, therefore, proceed to a change of supplier. This system will provide ratings which will reflect the quality characteristics of the customer in relation to his overdue debts and will provide an indication to the new supplier regarding the solvency of the customer.

If the customer does not comply with the terms of the debt settlement agreed with the previous supplier and owes an amount which corresponds to at least six months of electricity consumption, the previous supplier exceptionally retains, for a period of six months from the change of supplier, the right to request the termination of the customer's supply by the new supplier.

RAE proposes that the new scheme should enter into force for a period of one year, upon which it should be re-evaluated as to whether it is effective in reducing the accumulation of debts and addressing abusive customer behaviour. In the context of this additional public consultation, all interested parties were invited to submit any comments and observations until 5 March 2021.

Amendments to the Greek Energy Balancing Rulebook

by Konstantinos Ntallas (Athens)

On 14 January 2021 the Regulatory Authority for Energy (RAE) issued Decision No. 54/2021 (Official Journal B' 531/2021) which amended the Electricity Balancing Rulebook and established measures aimed at its proper functioning and effective competition in it. The amendments concern the setting of limits in the submission of offers for upward and downward energy balancing and a suspension of the possibility of submitting Balancing Electricity offers with negative prices by the Balancing Service Providers until the commissioning of the 400kV Transmission Line Megalopoli-System. RAE called on the Independent Power Transmission Operator (ADMIE) to immediately take all necessary actions to modify / adapt the information systems of the Balancing Market and its relevant Technical Decisions, in order to effectively implement the above measures from the 3rd Allocation Day following the publication of this Government Gazette, as well as to provide to RAE, by 15 February 2021, detailed information on the financial impact, from 1 November 2020, of the submission of an upward or downward Offer of Balancing Energy in MW, in a manner incompatible with the Technical Minimum Production.

Furthermore, RAE determined that the establishment of a ceiling on the submission of bids for the energy balancing is not advisable at this point, because, despite the "unrealistic prices" that were observed during the first period of operation of the new market, the substantial reduction of the relevant costs as has occurred recently (end of December onwards) does not justify at this stage the adoption of such a measure. This de-escalation of the balancing market costs in combination with the measure of suspension of the possibility of submitting Balancing Electricity bids with negative prices by the Balancing Service Providers until the commissioning of the 400kV Transmission Line Megalopolis-System, are the main reasons why RAE deems it inappropriate to establish a ceiling. According to the operative part of the decision, its validity starts from its publication in the Official Gazette, which occurred on 10 February 2021, and the implementation of the amendments included in it starts from the third Distribution Day following the publication of the decision in the Official Gazette, i.e. on 13 February 2021.

Oil & Gas

Gas TSO Appointed as Balancing Forecasting Party

by Mira Todorovic Symeonides (Athens)

On 21 January 2021 the Energy Regulatory Authority (RAE) issued decision no. 70/2020 (Official Journal B' 473/2021) on designating the Hellenic Gas Transmission System Operator S.A. (DESFA) as the balancing forecasting party for the zone of the Hellenic National Natural Gas System, in compliance with article 39.5 of the EU Commission Regulation 312/2014 on establishing a Network Code on Gas Balancing of Transmission Networks. According to the Regulation, the forecasting party is responsible for forecasting a network user's non-daily metered off-takes and where appropriate its subsequent allocation. DESFA shall also undertake to develop the respective information model which should secure smooth flow of natural gas into network. Further, the above decision obliges DESFA to submit, within 3 months from receiving of the decision, the following: a) proposed procedure of exchange of information with the distribution network operators as well as all phases of the forecast preparation procedures; b) data regarding the costs (investment and operation costs) necessary for DESFA to undertake this role and the proposed securing of these funds; and c) proposed incentive mechanism regarding the provision of an accurate forecast for a network user's non-daily metered off-takes.

RAE particularly took into consideration that it is difficult to obtain intraday information regarding the network users which provide gas to the final consumers without installed hourly-metered consumption, thus the information is based on an assumption; that there is a high number of such consumers; that the distribution network in Greece is currently in its transitional period as the size of the networks is continuously increasing, as well as the number of the distribution network operators; and that the shareholding structure of some of the operators is undergoing changes. In regards to the information model, RAE refers to its Decision no. 780/2020 on Designation of the Information Model for the Balancing Zone of the Hellenic National Natural Gas System, in compliance with article 33.4 of the Regulation (EU) 312/2014, which regulates that the national regulatory authority shall decide on one information model per balancing zone and that for information provision on intraday metered inputs and off-takes, the same rules shall apply to all models.

Infrastructure

Approved Preventive Action Plan for the Security of Gas Supply

by Pavlos-Ioannis Kasselakis (Athens)

On 17 February 2021, Energy Regulatory Authority (RAE) approved the Preventive Action Plan regulating the measures to ensure security of gas supply in compliance with articles 8 and 9 of the Regulation (EU) 2017/1938, by virtue of its Decision no. 216/2021.

In more detail, the scheme of actions to be taken comprises of a set of measures, mainly referring to the additional capacity offered by the Operator and their distribution at the Access Points, the improvement of the planning framework for the unloading of Liquid Natural Gas (LNG) in two separate phases (Planning A and B), as well as the utilization of the Revythousa LNG plant in order to maintain seasonal stock of LNG by the electricity producers.

In addition to the aforementioned actions, the plan enlists a set of measures and obligations, including the development of specifications and guidelines for the establishment of Business Continuity Systems, the obligation of Operators and Electricity Producers for the Maintenance of Business Continuity Systems, and the designing of a Risk Management System for the security of supply. Furthermore, the plan includes several obligations of Transmission System Operator for the substantiated estimation of demand, obligations of Natural Gas Providers, obligations of Electricity Producers using Natural Gas fuel, as well as provisions for the exemption of diesel oil used as an alternative fuel from excise duty.

RAE Approves 2021-2025 Gas Distribution Network Development for the Rest of Greece

by Mira Todorovic Symeonides (Athens)

On 4 March 2021, the Regulatory Energy Authority's (RAE's) decision no. 1615/2020 approving the Development Programme of the Public Gas Distribution Networks S.A. (DEDA) for the distribution network of the Rest of Greece, in the period 2021-2025, was published in the Official Journal B' 844/2021. The approved budget of approximately €272.500.000 should cover the costs of development of low and medium pressure network, new interconnections, decompressors, investments IT and in buildings, all in the regions of the Rest of Greece (meaning the area other than Attica, Thessalonica and Thessaly). Particularly, the Programme envisages the development of 133 km of the medium pressure network in the four regions of Greece (Central Greece, Central Macedonia, East Macedonia and Thracie, as well as West Macedonia) and 1.725 km of the low pressure network in the above 4 and another 2 regions of Greece (West Greece and Epirus). The network is planned to be developed in the above 6 regions and specifically in 34 municipalities, some of which now do not have any natural gas network, while the works should be executed simultaneously in several municipalities of different regions.

The approved Programme, however is not substantially different from the previously approved 2020-2025 Programme, with the exception of the length of the network in the West Macedonia. The amendments include the determination of the exact kilometers of the network and precise construction costs due to the fact that the necessary technical studies have been finalised in the meantime. The delay in implementation of the Programme approved last year is, according the company, justified by the amendments of the regulatory framework, delay in approving of the documents for the competitive procedures for construction of the network and in obtaining of the installation and operation licenses for the decompressors, delay in approval of the financing of the part of the budget by the State etc. It should be noted that the new Programme does not increase distribution tariffs which remain at the last year's level, ranging from 4,5€/MWh in the Central Greece to €18,3/MWh in the West Macedonia.

Intergovernmental Agreement for the IGB Project and EMGF Statute Ratified

by Andriani Kantilleraki (Athens)

On 29 January 2021, law n. 4769/2021 regarding the intergovernmental agreement on the IGB Project and the establishment of the EMGF was published in the Official Gazette (A' 14/29.01.2021). By virtue of the aforementioned law, the intergovernmental agreement between Greece and Bulgaria relating to the IGB gas pipeline (gas interconnector between the countries), was ratified. At the same time, the law provides for the ratification of the statute of the EMGF (East Mediterranean Gas Forum).

In more detail, the ratified intergovernmental agreement provides the specifics for the construction and operation of a cross-border interconnector pipeline originating in the Hellenic Republic and designed to transport natural gas to and from the Republic of Bulgaria, with the view of enhancing the security and availability of natural gas supply, a goal which makes the IGB project a project of common interest (PCI). The main provisions of the intergovernmental agreement refer to the permissions regarding the transport of natural gas, the performance and observance of the agreement, the undertaking of responsibilities such as the non-interruption of the project activities as well as tax relating issues. It should be mentioned that the IGB Project is being implemented by the joint venture company ICGB AD, registered in Bulgaria in 2011, with shareholders BEH EAD (50%) and IGI Poseidon (50%). The co-shareholder IGI Poseidon is a company, registered in Greece, with shareholders being the Greek public gas corporation DEPA SA (50%) and the Italian energy group Edison SpA (50%).

Furthermore, in regards with the ratification of the Statute of the East Mediterranean Gas Forum, the contracting parties, i.e. the Cypriot, Egyptian, Greek, Israeli, Italian, Jordanian and Palestinian Governments, agreed to the establishment of the EMGF (or Forum) as a regional intergovernmental organisation, whose goals are (among others) as follows:

- a) the cooperation in order to manage the sustainable, efficient and environmentally conscious development, use and conservation of natural gas resources,
- b) the formulation of regional policies on natural gas issues and
- c) the formation of a regional gas market, thus ensuring security of supply.

The aforementioned targets can be promoted through the development of policies and strategies, the enhancement of governmental cooperation in this respect, the promotion of coherent frameworks and the collaboration with financing institutions in order to minimise the investment risks. The Statute further provides for the establishment of three main bodies (the Ministerial Meeting, the Executive Board and the Secretariat) as well as their duties and obligations.

RES

RAE's Decision on Interconnection Terms for Connection to the Network

by Andriani Kantilieraki (Athens)

On 22 October 2020, the Regulatory Authority for Energy (RAE) issued its decision n. 1444/2020. By virtue of the aforementioned decision, RAE accepted the complaint filed by the investors of two photovoltaic power stations against the Hellenic Electricity Distribution Network Operator (DEDDHE) concerning the offers for connection with the network proposed by the latter.

In more detail, the claimants complained about the unfair interconnection terms imposed by DEDDHE, among which one could highlight the following; the omission of the Operator to provide for the installation of a current inverter and a mutual connection point between the stations in order to reduce the respective costs; the unfair enforcement of the condition for the upgrade of the Medium Voltage line (by replacing the 50 mm² ACSR conductors with 95 mm² ACSR conductors) especially considering that no such obligation was imposed and included in the terms of previous relevant projects; and the failure to provide essential information resulting to the misleading of investors.

Taking under consideration the complaints and respective documents filed by DEDDHE, RAE accepted the positions of the claimants as regards the imposition of a differentiated practice by the Operator during the technical examination and evaluation for the connection of the power stations in comparison with previous projects without due cause, thus infringing the provisions of articles 127 and 128 of law 4001/2011 and articles 5, 53 and 70 of the Electricity Distribution Network Operation Code. As a result, RAE imposed a fine amounting to €50.000 to DEDDHE and recommended towards the Operator to address a new proposition to the claimants for the submission of a joint connection application for both power stations as well as to provide further information and notices towards RAE.

ALBANIA

Market

Approval of the Updated Complaint form of Electricity and Natural Gas Customers

by Blerta Topore (Tirana)

On 15 January 2021 the Board of the Energy Regulatory Entity (ERE), issued its decision n. 07, after reviewing the report no. 142/19 prot, dated 24.12.2020, prepared by the Directorate of Consumer Protection, Performance and Standards on Approval of the updated complaint form. According to that decision ERE found that:

The scope of work of the Directorate of Consumer Protection, Performance and standards among others consists in handling and resolving all complaints and direct conflicts arising from the relationship between the supplier of electricity or natural gas and customers, as well as between the licensees, aiming at protecting the interests of end customers and protecting their interests as a whole from abuses in the electricity and natural gas market.

- The updated grievance form has been reformatted for ease of completion by energy customers as well as supplemented with data that facilitates the grievance registration process under the combined working conditions of the administration.
- The contents of the form also contain the provisions of the Law on Personal Data Protection, informing each client who signs this form the purpose for which he authorizes the processing of the data made available.
- In the content of the form are provided provisions for the selection of modalities of addressing the complaint in official correspondence or through electronic communication, determining the status of the complainant as a customer of electricity or natural gas, etc.

Pursuant to the abovementioned point, the ERE Board decided the Approval of the Complaint Form to electricity and natural gas customers.

Oil & Gas

Regulation for Determining the Criteria in Exercising the Activity of Natural Gas Storage

by *Blerta Topore (Tirana)*

The ERE is the authority responsible for determining the purchase price of electricity produced from small renewable sources from the sun with an installed capacity of up to 2MW and wind with an installed capacity of up to 3MW, in accordance with the methodology approved by the Council of Ministers. The companies "WINDSBAB" shpk, "MAX ENERGY" shpk and "SEMAN EOLIK" shpk are the only companies that have received final approval from the Ministry of Infrastructure and Energy for 2019 for the construction of wind farms with power up to 3MW; Despite the number of licenses issued over the years for the construction of wind farms in Albania, these companies are implementing for the first time this technology, bringing diversification of electricity production from renewable sources with lower cost investments. Based on the experience created for determining the purchase price of electricity produced by photovoltaic generation plants up to 2MW, the purchase price of electricity produced by wind farms with installed capacity up to 3MW has been calculated. From the application of the formula for the calculation of LCOE, for the determination of the price for wind farms, results a price of 75.64 Euro / MWh On 4 December 2020, the Board of the Energy Regulatory Entity (ERE), issued its decision n. 204, after reviewing the report with no. 127/3 prot, dated 02.12.2020, prepared by the Directorate of Natural Gas, on the initiation of the procedure for the approval of the "Regulation on determining the criteria for the exercise of natural gas storage activity". According to that decision, it was concluded that:

- The Technical Directorates have drafted the Regulation on the storage of natural gas, to provide stakeholders in the gas industry, the Regulatory Act that sets the criteria for the exercise of activity by licensees in the natural gas sector.
- This document will provide a clearer picture of the modalities of exercising this activity, especially for the gas storage site in salt deposits (Dumre), in the depleted oil wells (wells; Cakran-Mollaj, Ballsh-Hekal, Visokë, Patos, Gorisht-Kocul, Marinëz), and gas sources (Divjakë, Frakull, Povelçë, Ballaj-Kryevidh, Panaja, Finiq-Kranë), in the aquifers (Aquifaire) where they can be identified, in the Republic of Albania.

This Regulation sets out the criteria that the ERE plans to use when considering the most appropriate third-party access regime or exemption for gas storage in Albania in the future. For all the above, the ERE board, decided:

- a. The initiation of the procedure for the approval of the "Regulation for determining the criteria for exercising the activity of natural gas storage".
- b. The Directorate of Natural Gas, to notify the stakeholders about the decision of the ERE board.

Conditions for the Licensee Charged with the PSO for the Natural Gas Sector

by *Blerta Topore (Tirana)*

On 28 December 2020, the Board of the Energy Regulatory Entity (ERE), issued its decision n. 267 regarding the Initiation of the procedure to approve "Conditions for the licensee in charge of public service obligation for the natural gas sector in Albania". Law no.102 / 2015 "On the natural gas sector", as amended, provides that ERE determines the conditions that must be met to obtain a license, considering, inter alia, public service obligations, as provided in this law; In article 92, point 3, in Law 102/2015 "On the natural gas sector" ERE defines and approves the operational rules for suppliers that perform the supply of natural gas as a public service obligation. The public service provider must provide to the customers who have the right of public service, the supply service in accordance with the standard supply contract approved by the ERE in accordance with Article 95 of Law no. 102/2015, "On the natural gas sector" and relevant legislation for customer protection.

As defined in article 4, point 4.1, of DCM no. 533, dated 25.07.2019, the public service obligation to a licensee is imposed by the ERE, in accordance with Article 89 of Law 102/2015 "On the Natural Gas Sector", in a transparent, non-discriminatory and easily verifiable manner, guaranteeing equality of access for gas companies EU member states or contracting parties of the Energy Community for domestic customers and without hindering the opening of the natural gas market and the right of other natural gas suppliers to supply customers in the Republic of Albania.

These rules/operational conditions for the Public Service Provider FSHP with natural gas that are imposed on the licensee charged with this obligation by ERE, have been compiled in accordance with the principles of law no. 102/2015 "On the natural gas sector", with the aim achieving a competitive, secure and sustainable natural gas market, by environmental point of view, without being discriminated against in their rights and obligations.

Also, are taken into consideration the Decision of the ERE board no. 68, dated 22.04.2020 on the approval of the "Natural Gas Transmission Network Code" and the Decision of the ERE board no.166, Date 22.10.2020 on the approval of the General Conditions of the type contract of natural gas supply for end customers who benefit from the public supply service".

Environment

Albania adopts Climate Change Law

by *Blerta Topore (Tirana)*

On 17 December 2020, the Albanian Parliament approved law no.155, "On Climate Change". This law is partially aligned with: a) Directive 2003/87/EC of the European Parliament and of the Council of 13 October 2003 and b) Regulation (EU) no. 525/2013 of the European Parliament and of the Council, dated 21 May 2013. The main purpose of this law is:

- to contribute to the reduction of greenhouse gas emissions;
- accelerate adaptation to climate change, with the aim of mitigating the harmful effects of climate change;
- to contribute to the global efforts to climate change through the fulfillment of the obligations of the Republic of Albania to the Convention;
- establish a comprehensive legal and inter-institutional framework for climate action at national level in line with EU climate change legislation;
- to join the states that recognize the climate emergency, according to the decision of the European Parliament of 28 November 2019;

The impact expected from the adoption and implementation of this law concerns:

- the encouragement of environmentally friendly investments;
- the Competent Authority to discourage the transfer of old technologies, and encourage research in science and technology, as well as the development, transfer and use of technologies, equipment and processes for reducing GHG emissions and adaptation, in order to reduce vulnerability to climate change, to improve environmental performance and to support sustainable development;
- to encourage private sector involvement;
- Competent Authorities will promote the development of local and national projects and programs;
- to Encourage The Green Climate Fund GCF (an international funding mechanism) to support investments in greenhouse gas reduction and adaptation to climate change;

The aforementioned law will enter into force 6 months after its publication in the Official Bulletin.

BOSNIA & HERZEGOVINA

RES

FBiH suspends issuing of licenses for small HPPs

by *Mirjana Mladenovic (Belgrade)*

On 1 April 2021, the FBiH Government at its session determined and sent to the FBiH Parliament the Proposal of the Law on Amendments to the Law on Electricity in FBiH ("**Amendments**"). One of the novelties is the provision that a small hydropower plant (**small HPP**) is a hydropower facility with installed capacity up to and including 10 MW. Amendments also prescribed suspension of issuance of the energy permits for small HPPs. In addition, the applicants for the issuance of an energy permit who have concluded concession agreements with the competent authority before the entry into force of these Amendments are exempted from this rule, provided that they are obliged to complete the application for the issuance of an energy permit within three years.

These Amendments were proposed after the FBiH Government instructed the competent federal ministries, two water agencies and the FBiH Concessions Commission to prepare proposals for amendments to all regulations within their competences regarding construction of small HPPs, all in accordance with the conclusion of the House of Representatives of the FBiH Parliament.

Completion of the Wind farm Podveležje 1 construction

by Mirjana Mladenovic (Belgrade)

The first wind power plant Podveležje 1 owned by the company Elektroprivreda Bosne (EPB) has been completed. This wind power plant has an installed capacity of 48 MW and it will annually produce 130 GWh of electricity which will significantly increase the production from renewable sources within the EP BiH system. This project which was financed by a loan from the German Development Bank (KfW) and Elektroprivreda BiH (EPBiH) funds, included the construction of access roads about 10 kms long, a 110/30 kV substation and a 110 kV connecting transmission line about 2.5 kms long. The consortium of Siemens Games Renewable Energy Croatia and Wind Power A/S Denmark was in charge of design, delivery of equipment, construction works, installation, testing and commissioning of wind turbines, and ABB Zagreb was engaged in the substation and cable and telecommunications network.

Wind power plant Podveležje 1 will contribute to the efficient use of Bosnia and Herzegovina's natural resources and reduce the environmental and climate change impacts of fossil fuels. The EPBiH states that the first kilowatts of electricity were produced during the testing of wind turbine functionality and their readiness for parallel operation with the grid, and the final tests of compliance with the requirements of the Grid Code will be conducted during the trial operation of the wind farm. Also, the director for Capital Investments of EPBiH, stated that the construction of three more wind power plants is planned - Podveležje 2, Vlačić and Bitovnja.

BULGARIA

Electricity

Consultation on Bulgaria's electricity market reform plan

by Kosmas Karanikolas (Athens)

On 21 January 2021, Bulgaria launched its Implementation Plan encompassing the required market reforms as well as the deadlines for their introduction, in compliance with the Internal Market for Electricity Regulation (art. 20 para. 3 of the EU Regulation 2019/943), while, on the same date, the Commission initiated a consultation on the proposed reforms, in order to be facilitated to assess them.

As far as the **wholesale market** is concerned, the aforesaid plan stresses the need for market liberalization and, in this regard, provides for the termination of two long term electricity purchase contracts concluded 20 years ago, in 2001, between the national Bulgarian electricity company (Natsionalna Elektricheska Kompania – NEK) and two power plants, Maritsa East 1 (ME1) and Maritsa East 3 (ME3). It is noted that these contracts' cessation is a condition precedent to the introduction of a capacity mechanism. Moreover, Bulgaria plans to remove the remaining quotas in the electricity market which currently remain in the segment concerning the securing of the consumers needs at regulated prices.

Market couplings in the standing **day-ahead and intraday market frames** are also proposed. As far as the former is concerned, the market coupling on the Bulgarian - Greek border is estimated to be implemented in April 2021, the coupling on the Bulgarian – Romanian frontier is scheduled to be launched afoot (estimated initiation; August 2021), the North Macedonia – Bulgaria coupling is expected to be realized during the 1st trimester of 2022 while the Serbian – Bulgarian coupling is the least mature project. As far as market the **intraday market is concerned**, albeit Bulgaria's Electricity System Operator (ESO) and the Independent Bulgarian Energy Exchange (IBEX) joined in the coupling of the intraday markets through the BG-RO border and are, therefore, numbered among the Single Intraday Coupling (SIDC)'s operating parties, the implementation of a market coupling in the BG-GR border has been postponed due to the Greek party's absence of technical preparedness.

Regarding **balancing capacity**, Bulgaria's Transmission System Operator (TSO) recently launched a new platform for auctions, the first monthly auction bidding being completed at the end of December 2020. As long as Regulation 2019/943 requires that contracts for balancing capacity shall not be concluded more than one day before the capacity's provision, the contracting period not exceeding one day, as of 1 July 2021, Bulgaria intends to ensure that at least 40% of all balancing capacities will be purchased on a daily basis. Moreover, by virtue of a forthcoming amendment of the standing mechanism, balancing energy providers will be afforded the fluency to update the prices of their offers up to two hours prior to the intraday cross-zonal market gate closure time. Finally, the lifting of price restrictions for activation of balancing energy is anticipated to be fully effectuated until 01 July 2022.

Furthermore, alterations are programmed in Bulgaria's **retail market**. In this regard, albeit all non-household customers, including micro enterprises, are no longer subject to regulated prices as of 1 October 2020, households' electricity market is scheduled to be liberalized gradually and step-wise, the relevant transition being completed not earlier than the end of 2024. Given that household consumers are not accustomed to a competitive energy market without regulated prices, Bulgaria will launch a comparative electricity supply offers' aggregator in early 2021. As market liberalization entails the danger of vulnerable consumers being deprived of access to electricity, Bulgaria plans to determine criteria (such as low income, high energy costs compared to the available income and low energy efficiency), in order to detect households in a position of energy poverty and, thus, insert measures to eliminate them, price intervention being, at present, excluded from the measures to be employed to that end.

Oil & Gas

Bulgaria launches EUR 73 million gas interconnector project

by Apostolos Christakoudis (Sofia)

On 22 January 2021, The Public Procurement Agency (PPA) published the procedure for the requirements for the construction of a gas interconnection between Bulgaria and Serbia on Bulgarian territory, according to a reference on the agency's website. The contracting authority is Bulgartransgaz.

Bulgaria is launching a public procurement for Gas Interconnection Bulgaria-Serbia (IBS), a reverse connection that will link the national gas transmission networks of Bulgaria and Serbia. The estimated value of the project is EUR 73 million (BGN 143,559,450), and stakeholders had until 22 February 2021 to file their offers.

The gas pipeline's total length is approximately 170 km – from the existing site for treatment plant "Novi Iskar" of the national gas pipeline with length of the transmission gas pipeline from the starting point up to the point of crossing the Bulgarian-Serbian border of about 62 km and the end is at the Bulgarian-Serbian border.

Since 62 km of the line will be on Bulgarian territory, Bulgaria's gas transmission operator Bulgartransgaz EAD is holding the public procurement procedure for "Investment design–working design phase, delivery of the necessary materials and equipment, construction and commissioning of the site: 'Interconnection gas connection Bulgaria - Serbia on Bulgarian territory'".

Secure access to natural gas is expected to accomplish the following for Bulgaria: reduce energy dependency, ensure a gas supply along the route of the interconnection for all household and industrial users, ensure recovery and economic development in the municipalities along the pipeline route, enable enterprises switching from electricity and petroleum products to natural gas, generate significant savings and reduce harmful emissions. As a result, the IBS project is considered to be extremely important for the Bulgarian economy.

MONTENEGRO

Energy

The Citizens Decide on Offshore Oil After Exploratory Drilling

by Mirjana Mladenovic (Belgrade)

After the protest of environmentalists and the warning of the State Audit Institution according to which Montenegro is not ready to repair the oil slick if the spill occurs, the Ministry of Capital Investments announced that it will not give up exploratory drilling in the Adriatic. Namely, they stated that if it gave up exploratory drilling in the project for possible exploitation of oil and gas, Montenegro would have to pay at least 35 to 40 million euros to the Italian Eni and the Russian Novatek. Having in mind that they are faced with opposition among environmental organizations, they stated that they will first determine whether suitable reserves for exploration exist and that a public discussion can be held after that in order to reach a decision. In addition to the request from the non-governmental sector to grant a concession agreement for works on the Adriatic Sea, the project is overshadowed by the conclusion of the State Audit Institution (SAI) that Montenegro does not have adequate equipment to protect the environment in case of major incidents.

ROMANIA

Oil & Gas

TRANSGAZ Approved the Financing of the Development Plan in the Period 2020-2029

by Raluca Draghici (Bucharest)

The National Natural Gas Transport Company "TRANSGAZ" SA is a Romanian legal entity majority owned by the Romanian State which aims to fulfil the national strategy established for natural gas transport, international transit, dispatching and research-design in the field of natural gas transport by performing, in compliance with the Romanian legislation, of commercial acts corresponding to the object of activity. "TRANSGAZ" S.A. is the technical operator of the national transport system and is responsible for its operation in conditions of quality, safety, economic efficiency and environmental protection.

"TRANSGAZ" SA developed last year the Development Plan of the National Natural Gas Transmission System in the period 2020-2029, plan which has been approved by the National Regulatory Authority for Energy on 25 November 2020. At the end of January 2021, "TRANSGAZ" SA convened the Ordinary General Meeting of Shareholders having as item on the agenda the approval of the financing of the "Development Plan of the National Natural Gas Transmission System in the period 2020 - 2029". As a result of the General Meeting, the shareholders of, "TRANSGAZ" SA decided to approve the financing "Development Plan of the National Natural Gas Transmission System in the period 2020 - 2029" which includes projects of estimated value at approx. 4.1 billion euros.

Within this development project, "TRANSGAZ" SA aims to create a gas hub in Romania. Romania hub gas is an project that involves building a new vision on the natural gas market, respectively building a free, liquid, responsible, closely monitored market, developing ways to support vulnerable customers, uniquely dispatched to prevent crises in exceptional situations and total integrated into the European Energy Union. The HUB involves rethinking all activities in the natural gas sector for a single purpose, that of facilitating the trading of natural gas in order to obtain the best prices and ensure the quality of the natural gas transmission service.

Among the projects included within the Development Plan of the National Natural Gas Transmission System in the period 2020 – 2029 are:

1. New developments of the NTS in order to take over the gases from the Black Sea coast, having as term of completion the year 2021;
2. Development on the Romanian territory of the National Natural Gas Transmission System on the Bulgaria-Romania-Hungary – Austria Corridor (Phase II), having as term of completion the year 2022;
3. Development of the SCADA system for the National Natural Gas Transmission System, having as term of completion the year 2023;
4. Amplification of the two-way natural gas transport corridor Bulgaria – Romania – Hungary – Austria (BRUA-Phase III), having as term of completion the year 2025;
5. Interconnection of the national natural gas transmission system with the natural gas transmission system in Ukraine, in the direction of Gherăești – Siret, having as term of completion the year 2025;
6. Development / Modernization of natural gas transmission infrastructure in the North-West area of Romania, having as term of completion the year 2022 for Stage 1, 2025 for Stage 2, 2026 for Stage 3;
7. Increasing the natural gas transmission capacity of the Romania-Bulgaria interconnection on the Giurgiu-Ruse direction, having as term of completion the year 2027.

SERBIA

Electricity

Tariff for the System and Auxiliary Services in the Power System for 2021

by Mirjana Mladenović (Belgrade)

At the sessions held on 21 January 2021, the Energy Agency of the Republic of Serbia (AERS), in accordance with the Energy Law (*Official Gazette of RS, No. 145/14*), adopted the Decision on Prices of System and Ancillary Services in the Power System for 2021 ("Decision"). This Decision determines the prices of lease of power reserves for system services of secondary and tertiary regulation which are necessary for the provision of secure, reliable and stable operations of the power system, i.e. for readiness for regulation of frequency and power of exchange, as well as prices of auxiliary services for regulation of voltage, i.e. reactive power and prices of services for starting generators from voltage-free state.

Oil & Gas

Update on Case ECS-13/17 against Serbia

by Aleksandar Mladenovic (Belgrade)

On 3 February 2021, the Advisory Committee of the Energy Community has rendered its opinion in Case ECS-13/17 against Serbia opened on 27 July 2018, which concerns the Srbijagas, i.e. the company acting as the natural gas TSO in the Republic of Serbia and in charge of all entry and exit points to/from the Serbian natural gas transmission system, failure to implement third party access obligation by continuing to unilaterally exclude cross-border natural gas transmission capacities at the Horgoš entry point from open capacity allocation procedures.

The Energy Community Secretariat (ECS) preliminarily found that due to the unjustified exclusion from unrestricted and non-discriminatory third party access and from open capacity allocation procedures, the Republic of Serbia violates Article 32 of Directive 2009/73/EC („Gas Directive“) and Article 16 of Regulation (EC) 715/2009 („Gas Regulation“) and, therefore, fails to fulfill its obligations under Articles 6, 10 and 11 of the Energy Community Treaty. According to Serbia's assertions the restricted access to the Horgoš entry point has been justified in accordance with Article 35(1) of Directive 2009/73/EC and such exclusion of respective system entry point from capacity-allocation procedure satisfy the above criteria for refusal of access.

The ECS therefore submitted a Reasoned Request to the Ministerial Council on 19 April 2019 which Advisory Committee has now confirmed and which represents a last step before the Ministerial Council decision on the matter in accordance with the Rules of Dispute Settlement (article 32, Title IV, Chapter I). As ruled by the Court of Justice of the European Union (Judgement of 22 May 2008, citiworks AG, C-439/06, ECLI:EU:C:2008:298, para. 44; judgment of 9 October 2008, Sabatauskas and Others, C-239/07, ECLI:EU:C:2008:551, para. 33; judgment of 29 September 2016, Essent Belgium NV, C-492/14, ECLI:EU:C:2016:732, para. 76), third party access to transmission systems constitutes “one of the essential measures” which contracting parties must implement under the ECT and the respective obligations have been elaborated in the above mentioned Gas Directive and Gas Regulation.

for further information, please contact Editing authors



Mira Todorovic Symeonides, LL.M.
Partner
Rokas (Athens)

Andriani Kantilieraki, LL.M.
Associate
Rokas (Athens)



Authors

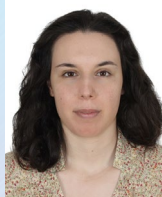
Rokas (Athens)

Rokas Law Firm, 25 & 25A Boukourestiou Str., 106 71 Athens, Greece, E athens@rokas.com



Viktoria Chatzara, LL.M.
Senior Associate

Sofia Getimi
Associate



Ellie Fenekou
Associate

Konstantinos Ntallas
Associate



Kosmas Karanikolas
Associate

Dimitris Mitsakos
Associate



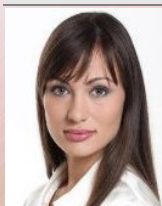
Pavlos – Ioannis Kasselakis
Associate

Agori Michopoulou
Associate



Rokas (Belgrade)

IKRP & Partners Belgrade, 30 Tadeusa Kosciuskog Str., 11000 Belgrade, Serbia, E belgrade@rokas.com



Mirjana Mladenovic, LL.M.
Associate

Aleksandar Mladenovic, LL.M.
Associate



Rokas (Bucharest) I.K. Rokas & Partners – Constantinescu, Radu, Ionescu SPARL, 45 Polona Str., District 1, Bucharest, Romania, E bucharest@rokas.com



Raluca Draghici
Associate

Rokas (Sofia) Rokas Law Firm- Branch Bulgaria - 12-16 Dragan Tzankov Blvd. Lozenetz Square, Sofia, Bulgaria E: sofia@rokas.com



Apostolos Christakoudis
Associate

Rokas (Tirana) IKRP Rokas & Partners Albania sh.p.k., Bulevardi "Dëshmorët e Kombit", Twin Towers, Tirana, Albania, E tirana@rokas.com



Blerta Topore
Associate