



**Demand assessment report  
for incremental capacity  
between *Trans Adriatic Pipeline* and  
*Interconnector Greece-Bulgaria***

**– Document for publication –**

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This report is a joint assessment of the potential for Incremental Capacity projects conducted by:

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## A. NON-BINDING DEMAND INDICATIONS

### Background

The gas interconnector Trans Adriatic Pipeline AG (**TAP**) and Interconnector Greece-Bulgaria (**IGB** or **IGB pipeline**), operated by ICGB AD (**ICGB**), interconnect at interconnection point Komotini (IP Komotini) with EIC: 21Z00000000472E, situated on the territory of Greece.

TAP became operational on 15 November 2020 and has been granted an exemption from the requirements on third party access, tariff regulation and ownership unbundling laid down in Articles 9, 32, 41(6), 41(8) and 41(10) of Directive 2009/73/EC.<sup>1</sup>

IGB became operational on the 1<sup>st</sup> October 2022, enabling additional gas flows from Greece to Bulgaria. ICGB operates under a specific regulatory regime pursuant to the *Final Joint Decision of the Energy Regulators on the Exemption Application of ICGB AD dated August 2018* (and the amendments to it).<sup>2</sup>

The TSOs, in compliance with the applicable regulations, have launched the Demand Assessment Phase of the Incremental Capacity process in July 2023, in line with the provisions of Article 26 of Commission Regulation (EU) 2017/459 establishing a network code on capacity allocation mechanisms in gas transmission systems (**CAM NC**).

The TSOs have received non-binding demand indications for forward firm capacity at IP Komotini and are publishing this joint Demand Assessment Report (**DAR**) in line with the provisions of Chapter V of the CAM NC.

The non-binding demand indications that were received by the TSOs before the publication of this Demand Assessment Report, conclude that the amount of non-binding demand indications received is not sufficient to start the technical design for an Incremental Capacity project in the coordinated Design phase by the TSOs. <sup>3</sup>

- TAP

TAP conducts its Market Test process under the Guidelines for the 2023 Market Test of Trans Adriatic Pipeline (**the Guidelines**) which define the rules and procedures to be followed in the 2023 Market Test process. These Guidelines reflect TAP's specific regulatory regime for the performance of its Market Tests. They seek to align the provisions of the Final Joint Opinion of the Energy Regulators on TAP AG's Exemption Application, dated 6 June 2013, granted by the Authorities pursuant to Directive 2009/73/EC (**FJO**) and of TAP's Tariff Code with the CAM NC.

TAP launched the 2023 Market Test on the 3rd of July, in coordination with its adjacent TSOs, and invited parties to submit non-binding demand indications by expressing interest for non-binding Capacity Requests, and/or Connection Requests as per the Guidelines until 28 August 2023. In addition, through the Guidelines, TAP allowed the possibility to the interested parties to revise the non-binding

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<sup>1</sup> European Commission Decision of 16.5.2013, Brussels, 16.5.2013 C(2013) 2949 final

<sup>2</sup> Accepted by Decisions of RAEEW of Greece n. 768/2018 and EWRC of Bulgaria n. P-BO-2 on 08.08.2018.// <https://www.dker.bg/bg/resheniya/resheniya-za-2018-god.html>

interest during the Revision Window which took place between 19 January and 2nd February 2024<sup>3</sup> and reinforced the right of any interested party to submit non-binding demand indications after the 8 weeks deadline, upon TAP’s reservation of rights to accept such interest, in line with the provisions of Article 26(7) of CAM NC.

In the Project Proposal for the first Binding Phase of the 2021 Market Test, as approved by the Italian, Greek and Albanian Authorities, at Section D “Provisional Timeline of the Incremental Capacity project (Art. 27 (3) d CAM NC)”, TAP, SRG and DESFA, have included their right to organise a second Binding Phase during 2023. The second Binding Phase was launched on 20 October 2023.

The 2023 incremental cycle is a separate process from the second Binding Phase of 2021 Market Test organised by TAP, SRG and DESFA. To mitigate any potential and unintended consequences of the two overlapping Market Tests, the Interested Parties have been given the opportunity to revise the already submitted 2023 non-binding demand indications within 2 weeks from the publication of the outcome of the second Binding Phase of the 2021 Market Test on 18 January 2024 (**Revision Window**). During the Revision Window, TAP has also remained open to receiving new non-binding demand indications. The non-binding demand indications are listed in an aggregated manner per the IP between TAP and IGB – Komotini.

- IGB

ICGB launched the non-binding phase of the Incremental Capacity process in July 2023 in coordination with its adjacent TSOs and invited all interested parties to submit non-binding demand indications. Given the circumstance that TAP conducts its Market Test process under the specific Guidelines as specified above and since the DAR is a common document, that shall be produced and published jointly by the TSOs on both sides of an IP, ICGB is producing and publishing the DAR for the common IP Komotini jointly with TAP, following the timeframe applicable to TAP.

**1. Non-binding demand indications for Forward Firm Capacity**

The aggregated non-binding demand indications received by TAP and IGB for the IP Komotini are shown below:

<i>Exit Capacity</i>	<i>Entry Capacity</i>	<i>Gas Year(s)</i>	<i>Amount kWh/d</i>
TAP	IGB	2025/2026	14,520,548
TAP	IGB	2026/2027	29,520,548
TAP	IGB	2027/2028	29,520,548
TAP	IGB	2028/2029	29,520,548
TAP	IGB	2029/2030	14,520,548
TAP	IGB	2030/2031	14,520,548
TAP	IGB	2031/2032	14,520,548
TAP	IGB	2032/2033	14,520,548
TAP	IGB	2033/2034	14,520,548
TAP	IGB	2034/2035	14,520,548
TAP	IGB	2035/2036	14,520,548
TAP	IGB	2036/2037	14,520,548

<sup>3</sup> To recall, the Revision Window was included as a mitigation of the potential consequences of running the Demand Assessment Phase of the 2023 Market Test almost in parallel with the second Binding Phase of the 2021 Market Test (launched on 20 October 2023). More information here [2023 Market test > Trans Adriatic Pipeline \(TAP\) \(tap-ag.com\)](https://www.tap-ag.com/2023-Market-test-Trans-Adriatic-Pipeline-TAP)

TAP	IGB	2037/2038	14,520,548
TAP	IGB	2038/2039	14,520,548
TAP	IGB	2039/2040	14,520,548
TAP	IGB	2040/2041	14,520,548
TAP	IGB	2041/2042	14,520,548
TAP	IGB	2042/2043	14,520,548

## 2. Conditionalities

A number of interested parties specified conditionalities, as per Article 26(8) letter d) of CAM NC, applicable to their non-binding Capacity Requests in TAP.

The main conditionality refers to linking commitments at different interconnection points (e.g. interest in exit capacity from TAP being conditional upon the same amount of capacity being allocated at the requested entry point of TAP ).

ICGB has not received any conditionality applicable to their non-binding Capacity Requests for IP Komotini.

## B. DEMAND ASSESSMENT

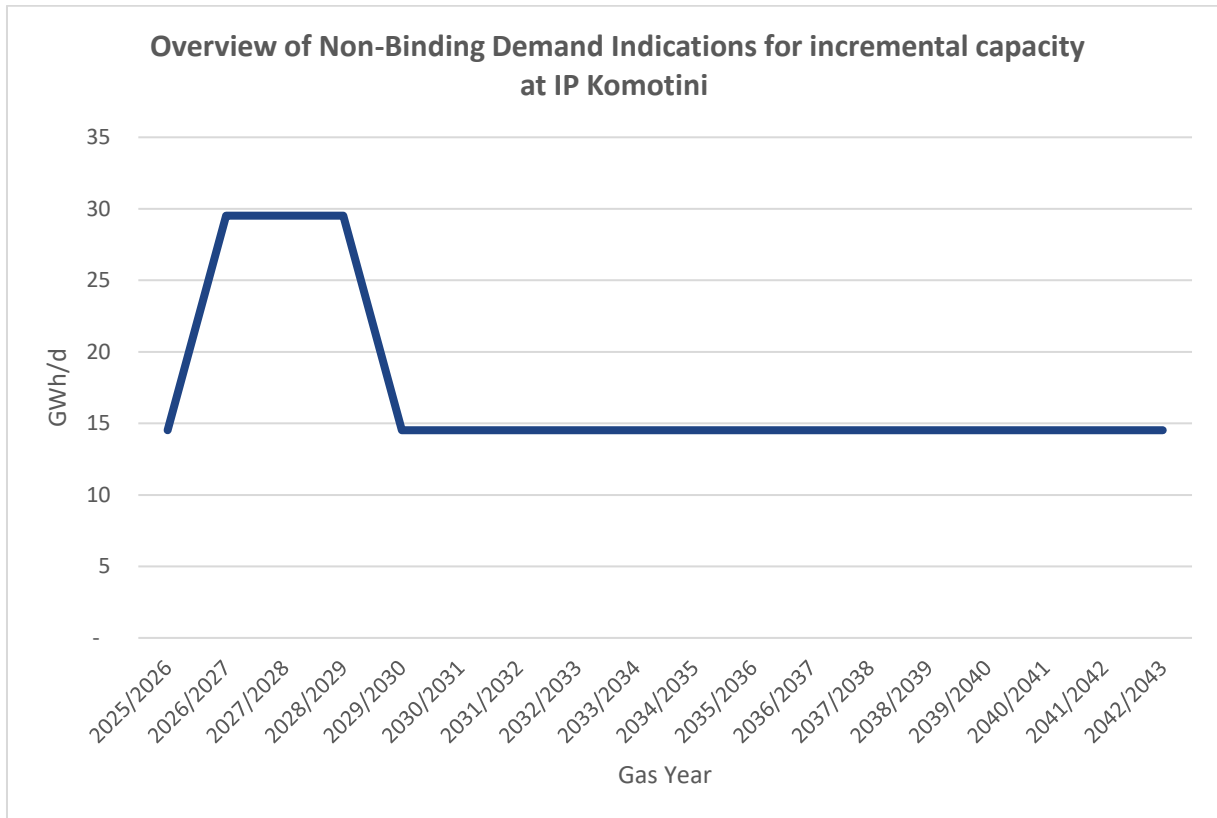
The Demand Assessment Phase commenced immediately after the start of the Annual Yearly Capacity Auction, as specified in Article 11(4) of CAM NC. Each of the TSOs from this market Demand Assessment Report gave network users the opportunity to submit non-binding demand indications to quantify potential demand for incremental capacity.

TAP opened the 2023 Market Test in compliance with the timeline provided by Article 26(2) CAM NC and the Guidelines. In TAP's case and as mentioned above, the 2023 incremental cycle is a separate process from the second Binding Phase of 2021 Market Test. To mitigate any potential and unintended consequences of the two overlapping Market Tests, the Interested Parties have been given the opportunity to revise the already submitted 2023 non-binding demand indications within 2 weeks from the publication of the outcome of the second Binding Phase of the 2021 Market Test on 18 January 2024.<sup>4</sup>

In total, TAP and ICGB have received the following non-binding demand indications expressed in GWh/d, as shown in the graph below:

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<sup>4</sup> [Market tests > Trans Adriatic Pipeline \(TAP\) \(tap-ag.com\)](#)



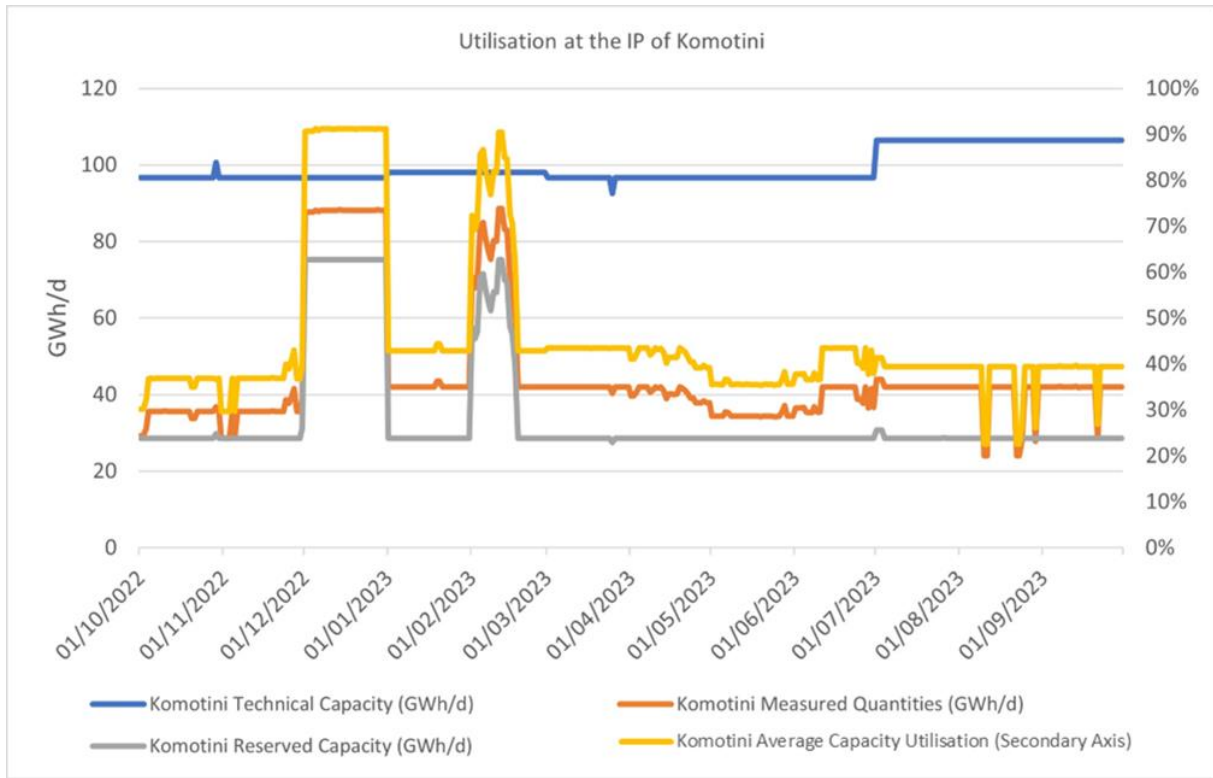
**1. Historical usage pattern**

The utilization of the technical capacity is presented in the charts below by comparing the technical capacity with the booked capacity, the allocated commercial flows and physical flows from the start of operations of IP Komotini which coincided with IGB’s start of operations on 1<sup>st</sup> October 2022.

- TAP

As of October 1<sup>st</sup> 2022, at IP Komotini, TAP offers the following capacity products on the PRISMA platform:

- Forward Firm Exit Capacity.
- Commercial Reverse Capacity (Route 2: Melendugno – Komotini and Route 3: Nea Mesimvria – Komotini).
- Virtual Entry Komotini (for Forward Flow to Nea Mesimvria or Melendugno).



- IGB

As of October 1<sup>st</sup> 2022 ICGB offers at IP Komotini the following capacity products on the PRISMA capacity booking platform:

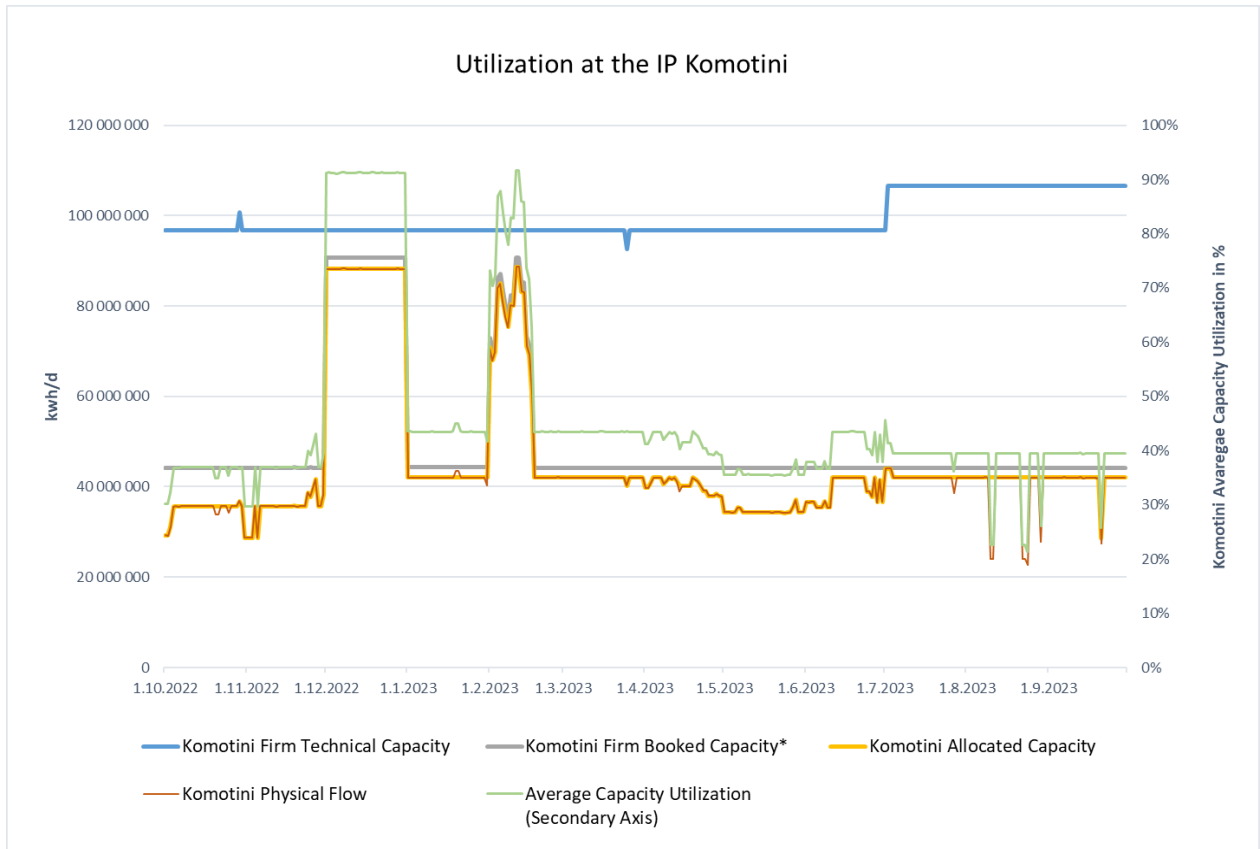
- Forward Firm Entry Capacity.
- Commercial Reverse Capacity.

In addition, at IP Komotini, ICGB has allocated Exempted Capacity under long-term contracts for up to 25 years since the start of commercial operation pursuant to the *Final Joint Decision of the Energy Regulators on the Exemption Application of ICGB AD dated August 2018* (and the amendments to it).<sup>5</sup>

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<sup>5</sup> Accepted by Decisions of RAEWW of Greece n. 768/2018 and EWRC of Bulgaria n. P-BO-2 on 08.08.2018.// <https://www.dker.bg/bg/resheniya/resheniya-za-2018-god.html>





\*Firm Booked Capacity is the sum of the Exempted Capacity booked under long-term contracts and the Forward Firm Capacity booked at the capacity trading platform.

## 2. Results of current annual yearly auction

- TAP

TAP offered the following products during the annual yearly auction from July 2023:

Network Point Exit/Entry	Category	Product	Gas Year	Offered Capacity KWh/d	Booked Capacity KWh/d
Komotini Exit	Firm	Yearly	2023/2024	55,146,048	0
Komotini Exit	Firm	Yearly	2024/2025	55,146,048	0
Komotini Exit	Firm	Yearly	2025/2026	55,146,048	0
Komotini Exit	Firm	Yearly	2026/2027	55,146,048	0
Commercial Reverse-Route 3 (Nea Mesimvria entry - Komotini exit) Bundle	Interruptible	Yearly	2023/2024	30,346,301	7,800,000
Commercial Reverse-Route 2 (Melendugno entry - Komotini exit) Bundle	Interruptible	Yearly	2023/2024	55,146,048	0

- IGB

The results of the recent annual yearly firm capacity auction that took place on 3<sup>rd</sup> July 2023 for the IP Komotini, are presented below:

Network Point Exit/Entry	Category	Product	Gas Year	Offered Capacity KWh/d	Booked Capacity KWh/d
Komotini Entry	Firm	Yearly	2023/2024	51,678,918	0
Komotini Entry	Firm	Yearly	2024/2025	51,678,918	0
Komotini Entry	Firm	Yearly	2025/2026	51,678,918	0
Komotini Entry	Firm	Yearly	2026/2027	51,678,918	0
Komotini Entry	Firm	Yearly	2027/2028	53,081,470	2,076,248

### 3. Relations to GRIPS, TYNDP, NDPs

- TAP

In line with TAP's exemption decision, TAP is exempted from Article 22 of the Directive 2009/73/EC concerning common rules for the internal market in natural gas for a period of 25 years as of TAP's Commercial Operations Date. For this reason, TAP has not been listed in any National Development Plans (**NDP**) (even for its initial capacity).

In what concerns the EU Ten Year Network Development Plan (**TYNDP 2024**) process, at the moment of the publication of this Demand Assessment Report, data on the non-binding demand indications received during the Demand Assessment Phase of the 2023 Market Test had not been shared with ENTSOG, due to confidentiality reasons and because such information will be made publicly available only via the publication of the DAR. The information shared with ENTSOG for the TYNDP 2024 purposes covers TAP's expansion scenarios as resulting from the 2021 Market Test and second Project Proposal, as approved by the Italian, Greek and Albanian NRAs. <sup>6</sup> TAP has also provided the required information for ENTSOG's Third Incremental Capacity Process Report 2021-2023, based on the information available from the 2021 Market Test.<sup>7</sup>

In view of its strategic role, as well as substantial contribution to the security of supply, decarbonisation, market integration and competition, the European Commission, the European Parliament and the Council have given TAP's initial project the Project of Common Interest (**PCI**) status in 2013, 2015, 2017

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<sup>6</sup> Details on the TYNDP 2022 can be found [here](#).

<sup>7</sup> [Third Incremental Capacity Process Report 2021–2023 \(entsog.eu\)](#)

and 2019 for its role, amongst others, in opening up the Southern Gas Corridor, one of the energy corridors identified by the EU as priorities for the achievement of European energy policy objectives.

- IGB

IGB pipeline is included in the 5<sup>th</sup> edition of the Southern Corridor Gas Regional Investment Plan (SC GRIP)<sup>8</sup> of ENTSOG as a key transmission project for the Southern Corridor Region (project TRA-F-378).

IGB pipeline is included in the TYNDP 2015, 2017, 2018, 2020 and 2022 of ENTSOG<sup>9</sup>. Due to its specific regulatory regime ICGB is exempted from the obligation to submit a ten-year network development plan under Article of the Directive 2009/73/EC concerning common rules for the internal market in natural gas.<sup>10</sup> As an interconnector, IGB pipeline has not been included in any National Development Plans (NDPs) since NDPs refer mainly to developments on a national level.

IGB pipeline is acknowledged as a leading project within the CESEC (The Central and South-Eastern Europe energy connectivity) initiative.

The IGB Interconnector was included as a Project of Common Interest (PCI) in the First (2013), Second (2015), Third (2017), Fourth (2019) and Fifth (2021) PCI Lists.<sup>11</sup>

#### 4. Expected amount, direction and duration of demand for incremental capacity

- TAP

The amounts and directions of the demand for incremental capacity considered during the present procedure are the ones represented above in Section A for Forward Firm Capacity. Please note that these requests for further long-term Forward Firm Long-Term Capacity<sup>12</sup> may be accommodated within TAP's initial configuration of 10 bcma.

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<sup>8</sup> Fifth edition of the Southern Corridor Gas Regional Investment Plan (SC GRIP) of ENTSOG ([https://www.entsog.eu/sites/default/files/2022-03/GRIP\\_SC\\_2021\\_220318.pdf](https://www.entsog.eu/sites/default/files/2022-03/GRIP_SC_2021_220318.pdf))

<sup>9</sup> Ten Year Network Development Plan (TYNDP) 2022 of ENTSOG (<https://www.entsog.eu/tyndp#entsog-ten-year-network-development-plan-2022>)

<sup>10</sup> Section 4.1.(1) of Final Joint Decision of the Energy Regulators on the Exemption Application of ICGB AD dated August 2018 (and the amendments to it), accepted by Decisions of RAEWW of Greece n. 768/2018 and EWRC of Bulgaria n. P-BO-2 on 08.08.2018 <https://www.dker.bg/bg/resheniya/resheniya-za-2018-god.html>

<sup>11</sup> [Key cross border infrastructure projects \(europa.eu\) https://energy.ec.europa.eu/topics/infrastructure/projects-common-interest/key-cross-border-infrastructureprojects\\_en#:~:text=The%20PCI%20list%201%20Fifth%20PCI%20list%3A%20Regulation,PCI%20list%3A%20Regulation%20%28EU%291391%2F2013%20of%2013%20October%202013](https://energy.ec.europa.eu/topics/infrastructure/projects-common-interest/key-cross-border-infrastructureprojects_en#:~:text=The%20PCI%20list%201%20Fifth%20PCI%20list%3A%20Regulation,PCI%20list%3A%20Regulation%20%28EU%291391%2F2013%20of%2013%20October%202013)

<sup>12</sup> According to Section 2 of TAP's Network Code, **Forward Firm Long Term Capacity** means Firm Capacity in the TAP Transportation System for the transportation of Natural Gas in the Forward IP Direction that is made available to Shippers under a Gas Transportation Agreement at a particular Interconnection Point on every Gas Day for a period of more than one Gas Year.

- IGB

The amount and direction of the demand for the incremental capacity at IP Komotini, considered during the present procedure are the ones presented in Section A NON-BINDING DEMAND INDICATIONS.

The TSOs conclude that the non-binding demand indications received are lower than the available capacity at IP Komotini.

The analysis of the available capacity for the time horizon, for which capacity was requested at IP Komotini, shows that, taking into consideration historical usage patterns, the gas transport can be fully performed based on the available capacity at IP Komotini, on both sides of the IP.

### **C. CONCLUSION FOR THE NON-INITIATION OF AN INCREMENTAL CAPACITY PROJECT/PROCESS**

Based on the evaluation of the received non-binding demand indications as presented in Section B in relation to the available technical capacity for the same period at the interconnection point Komotini, an **Incremental Capacity project will not be initiated.**

TAP and IGB will not proceed to the next phase of the 2023 Incremental Capacity process and will not open the Coordinated Design Phase for the definition of technical studies specifically applied to IP Komotini. The amount of non-binding demand indications received by the TSOs can be accommodated inside the existing technical capacity.

### **D. PROVISIONAL TIMELINE**

N/A

### **E. INTERIM ARRANGEMENTS FOR THE AUCTION OF EXISTING CAPACITY ON CONCERNED IP(S)**

N/A

### **F. FEES**

According to Article 26(11) of CAM NC, transmission system operators may charge fees for activities which result from the submission of non-binding demand indications.

For the incremental capacity cycle addressed by this report, in compliance with CAM NC and the provisions of the Guidelines, TAP has requested fees for the evaluation and processing of the non-binding demand indications received in the value of 10,000 EUR/interested party.

For the incremental capacity cycle addressed by this report, ICGB has not introduced a fee for the evaluation and processing of non-binding demand indications.

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