

**Demand Assessment Report  
for Incremental Capacity  
between *Trans Adriatic Pipeline* and  
*ICGB***

**– Document for publication –**

**2025-10-27**



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

Trans Adriatic Pipeline AG

ICGB AD

Lindenstrasse 2  
6340 Baar  
Switzerland  
T: +41 41 747 3400  
F: +41 41 747 3401

23 George Washington Street  
Sofia 1000  
Bulgaria  
T: +359 (2) 4513 545

E: [market.test@tap-ag.com](mailto:market.test@tap-ag.com)  
[www.tap-ag.com](http://www.tap-ag.com)

E: [incremental.capacity@icgb.eu](mailto:incremental.capacity@icgb.eu)  
[www.icgb.eu](http://www.icgb.eu)



## TABLE OF CONTENTS

|    |                                                                                   |    |
|----|-----------------------------------------------------------------------------------|----|
| A. | Non-binding demand indications .....                                              | 4  |
| B. | Demand assessment.....                                                            | 5  |
| 1. | Historical usage pattern .....                                                    | 5  |
| 2. | Results of current annual yearly auction .....                                    | 7  |
| 3. | Relations to GRIPS, TYNDP, NDPs.....                                              | 8  |
| 4. | Expected amount, direction and duration of demand for incremental capacity .....  | 9  |
| C. | Conclusion for the Non-initiation of an incremental capacity project.....         | 9  |
| D. | Provisional timeline.....                                                         | 9  |
| E. | Interim arrangements for the auction of existing capacity on concerned IP(s)..... | 10 |
| F. | Fees.....                                                                         | 10 |
| G. | Contact information .....                                                         | 10 |

## 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: 21Z000000000472E, 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>

TAP and ICGB (the TSOs), in compliance with the applicable regulations, have launched the Demand Assessment phase of the Incremental Capacity process in July 2025, 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**).

### TAP specific process

TAP conducts its Market Test process under the Guidelines for the 2025 Market Test of Trans Adriatic Pipeline (**the Guidelines**) which define the rules and procedures to be followed in the 2025 Market Test process<sup>3</sup>. 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 2025 Market Test on the 7th of July 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 31 August 2025. In addition, through the Guidelines, TAP allowed the possibility to the interested parties to revise non-binding interest during a Revision Window which will take place after the Binding Phase of the 2023 Market Test has been concluded.

---

<sup>1</sup> European Commission Decision of 16.5.2013, Brussels, 16.5.2013 C(2013) 2949 final. Such exemption continues to apply, as also set out in recital 102 of Regulation (EU) 2024/1789 of the European Parliament and of the Council of 13 June 2024 on the internal markets for renewable gas, natural gas and hydrogen, amending Regulations (EU) No 1227/2011, (EU) 2017/1938, (EU) 2019/942 and (EU) 2022/869 and Decision (EU) 2017/684 and repealing Regulation (EC) No 715/2009 (recast).

<sup>2</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>

<sup>3</sup> [https://www.tap-ag.com/shippers/market-tests-7/market-tests-9/\\$30938/\\$30979/\\$31188](https://www.tap-ag.com/shippers/market-tests-7/market-tests-9/$30938/$30979/$31188)

In accordance with the Project Proposal for the Binding Phase of the 2023 Market Test, as approved by the Italian, Greek and Albanian Authorities, TAP opened the Binding Phase on 2 October 2025.

The 2025 incremental cycle is a separate process from the Binding Phase of the 2023 Market Test organised by TAP, SRG and DESFA. In accordance with the DAR published by ICGB and TAP concerning the IP of Komotini under the 2023 Market Test, the IP Komotini is not offered for booking in the Binding Phase of the 2023 Market Test. Therefore, also as set out in the Guidelines, it is not necessary to wait for the outcome of the Binding Phase to issue a DAR for the IP Komotini under the 2025 Market Test.

### **ICGB process**

ICGB launched the non-binding phase of the Incremental Capacity process in July 2025 in coordination with its adjacent TSOs and invited all interested parties to submit non-binding demand indications. ICGB is producing and publishing this DAR for the common IP Komotini jointly with TAP.

### **Non-binding demand indications**

No non-binding demand indications were received by TAP or ICGB for the IP Komotini for any Gas Year.

## **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 provided the network users the opportunity to submit non-binding demand indications to quantify potential demand for incremental capacity.

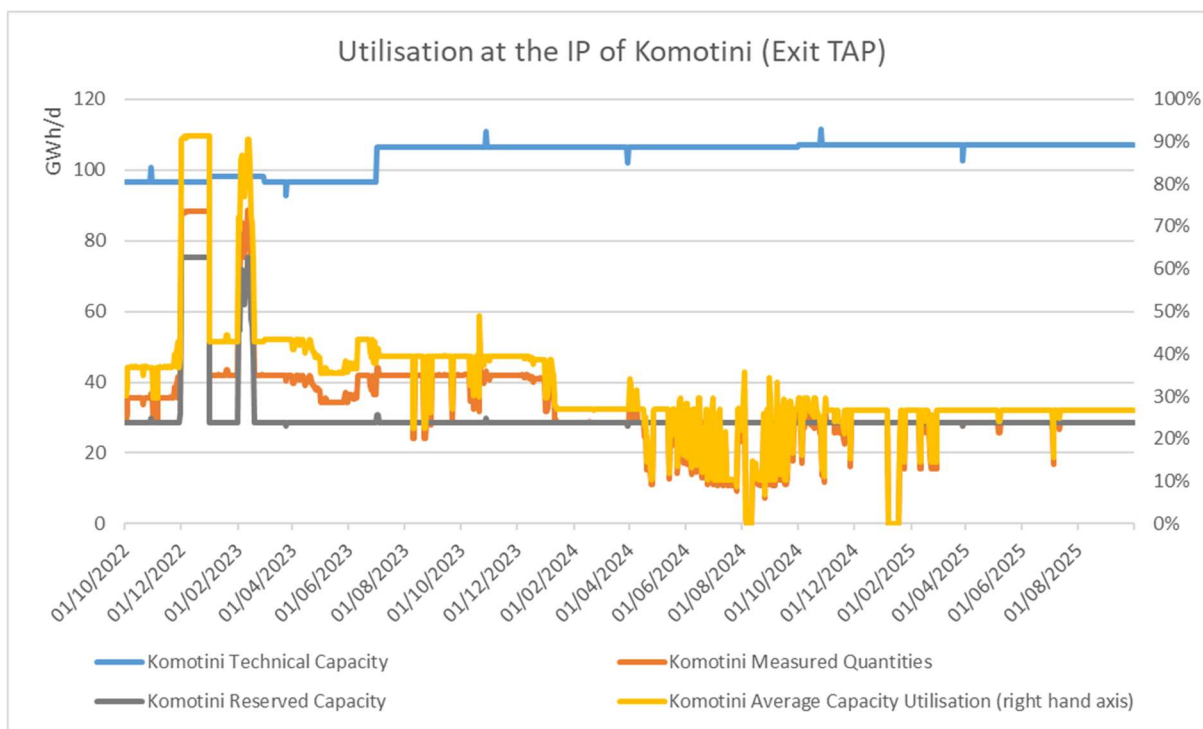
### **1. Historical usage pattern**

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

Since 1<sup>st</sup> October 2022, at IP Komotini, TAP has offered 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).



- ICGB

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

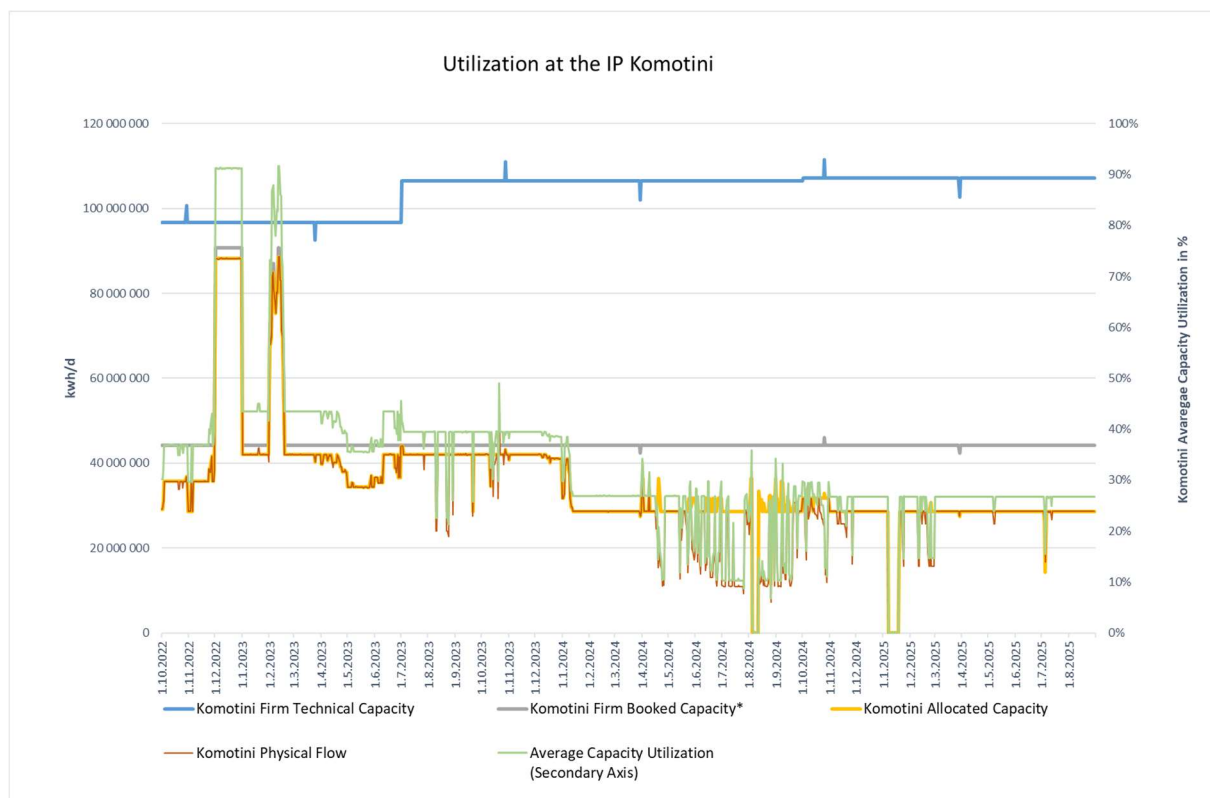
- Forward Firm Entry Capacity.
- Commercial Reverse Capacity.

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>4</sup>

*\*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.*

---

<sup>4</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>



## 2. Results of current annual yearly auction

- TAP

TAP offered the following products during the annual yearly auction of July 2025:

| Network Point Exit/Entry                                                | Category      | Product | Gas Year  | Offered Capacity KWh/d | Booked Capacity KWh/d |
|-------------------------------------------------------------------------|---------------|---------|-----------|------------------------|-----------------------|
| Komotini Exit                                                           | Firm          | Yearly  | 2025/2026 | 55,641,308             | 0                     |
| Komotini Exit                                                           | Firm          | Yearly  | 2026/2027 | 55,641,308             | 0                     |
| Komotini Exit                                                           | Firm          | Yearly  | 2027/2028 | 55,641,308             | 0                     |
| Komotini Exit                                                           | Firm          | Yearly  | 2028/2029 | 55,641,308             | 0                     |
| Commercial Reverse-Route 3 (Nea Mesimvria entry - Komotini exit) Bundle | Interruptible | Yearly  | 2025/2026 | 55,641,308             | 0                     |
| Commercial Reverse-Route 2 (Melendugno entry - Komotini exit) Bundle    | Interruptible | Yearly  | 2025/2026 | 30,346,301             | 0                     |

- ICGB

The results of the recent annual yearly firm capacity auction that took place on 7<sup>th</sup> of July 2025 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  | 2025/2026 | 42,795,335             | 0                     |
| Komotini Entry           | Firm     | Yearly  | 2026/2027 | 42,795,335             | 0                     |
| Komotini Entry           | Firm     | Yearly  | 2027/2028 | 42,121,639             | 0                     |
| Komotini Entry           | Firm     | Yearly  | 2028/2029 | 53,527,212             | 0                     |
| Komotini Entry           | Firm     | Yearly  | 2029/2030 | 53,527,212             | 0                     |

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

- TAP

In line with TAP's exemption decision, TAP is exempted from the obligation to submit annually to the regulatory authorities a 10 year development plan 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**), the information shared with ENTSOG covers TAP's expansion scenarios from the 2021 Market Test, as approved by the Italian, Greek and Albanian NRAs. 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.

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 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.

- ICGB

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

---

<sup>5</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))

IGB pipeline is included in the TYNDP 2015, 2017, 2018, 2020, 2022 and in the Draft TYNDP 2024 of ENTSOG<sup>6</sup>. Due to its specific regulatory regime ICGB is exempted from the obligation to submit a ten-year network development plan under Article 22 of the Directive 2009/73/EC concerning common rules for the internal market in natural gas.<sup>7</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>8</sup>

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

Considering the available capacity at IP Komotini, historical usage patterns, and the fact that the TSOs have not received any non-binding demand indications, the gas transport can be fully performed based on the current 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 fact that no non-binding demand indications have been received, no incremental capacity project will be initiated. TAP and ICGB will not proceed to the next phase of the 2025 Incremental Capacity process and will not open the Coordinated Design phase for the definition of technical studies specifically applied to IP Komotini.<sup>9</sup>

### **D. PROVISIONAL TIMELINE**

N/A

---

<sup>6</sup> Ten Year Network Development Plan (TYNDP) of ENTSOG

<sup>7</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>8</sup> [Key cross border infrastructure projects \(europa.eu\) https://energy.ec.europa.eu/topics/infrastructure/projects-common-interest/key-cross-border-infrastructure-projects\\_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-infrastructure-projects_en#:~:text=The%20PCI%20list%201%20Fifth%20PCI%20list%3A%20Regulation,PCI%20list%3A%20Regulation%20%28EU%291391%2F2013%20of%2013%20October%202013)

<sup>9</sup> Please note that this conclusion is without prejudice to other Interconnection Points of TAP, which will be covered under a separate Demand Assessment Report to be published in accordance with the TAP Guidelines.

## **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.

## **G. CONTACT INFORMATION**

### **Yngve Torvanger**

Tariff Manager

Trans Adriatic Pipeline AG

Lindenstrasse 2

6340 Baar, Switzerland

[www.tap-ag.com](http://www.tap-ag.com)

[market.test@tap-ag.com](mailto:market.test@tap-ag.com)

### **Svetlin Berkov**

Market Research and Regulation Expert

ICGB AD

23 George Washington Street

Sofia 1000, Bulgaria

[www.icgb.eu](http://www.icgb.eu)

[incremental.capacity@icgb.eu](mailto:incremental.capacity@icgb.eu)

