



**Plamen Mladenovski**  
**Chairman**  
**Energy and Water Regulatory Commission of Bulgaria**

**Dimitrios Fournalis**  
**Vice President**  
**Regulatory Authority for Energy, Waste and Water of Greece**

**Yurii Vlasenko**  
**Chairman**  
**National Energy and Utilities Regulatory Commission of Ukraine**

**George Sergiu Niculescu**  
**President**  
**National Energy Regulatory Authority of Romania**

**Alexei Taran**  
**Director General of the Board**  
**National Agency for Energy Regulation of Moldova**

**Dear Mr. Mladenovski,**  
**Dear Mr. Fournalis,**  
**Dear Mr. Vlasenko,**  
**Dear Mr. Niculescu,**  
**Dear Mr. Taran,**

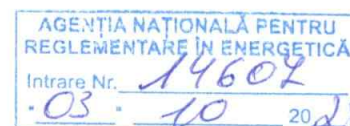
In May 2025, we, the Transmission System Operators of Bulgaria (Bulgartransgaz EAD), Greece (DESFA SA), Moldova (VestMoldTransgaz SRL), Romania (Transgaz SA), and Ukraine (Gas TSO of Ukraine) jointly requested your consent for offering the Route 1 bundled capacity product.

Route 1 was developed in the spirit of solidarity and can serve as an example for regional cooperation. This joint solidarity action aims to improve energy security and ensuring alternative and affordable energy supplies for Ukraine.

After receiving the support of the NRAs, the product was successfully offered to the market in a transparent, market based and non-discriminatory manner – being available for the period June-October 2025 for all market participants. It allowed capacity bookings along the route from Greece, via Bulgaria, Romania and Moldova, to Ukraine, ultimately connecting the Greek and Ukrainian VTPs.

It should be noted, that this joint endeavor of the TSOs received positive feedback by various market stakeholders, including from Ukraine-based shippers.

At the same time, the continuing attacks on Ukrainian infrastructure, including gas production facilities, are limiting domestic production. Attacks on gas transmission infrastructure are threatening also the continuous availability of transport routes. Thus, during the upcoming winter season, Ukraine will need to continue importing significant gas volumes via multiple routes in order to meet in a safe manner the country's urgent and immediate demand for gas, stemming both from consumption by residential users and heat and electricity producers and from filling the storages during the next injection period.



The import demand during next months remains substantial, and significant part of it can be delivered through the Trans-Balkan route, offering additional diversification of supply routes and contributing to the effective and satisfactory functioning of the gas system.

'Route 1' product serves for natural gas transmission from Greece to Ukraine, through the following Interconnection Points: Kulata/Sidirokastron, Negru Voda/Kardam, Isaccea/Orlovka, Kaushany and Grebenyky. It is offered on the Regional Booking Platform (RBP) on a monthly basis, on the 4<sup>th</sup> Monday of each month immediately preceding the month the auctions concerned. The discount applied on the respective capacity prices reflects the limitations imposed on the product users. The capacity offered with the product is the available capacity remaining after the 'regular' monthly capacity auction.

Route 1 facilitates gas supplies to Ukraine providing access to all interested parties at equal and transparent conditions.

We hereby reconfirm our commitment to develop a long-term, commercially attractive solution that is maximizing the use of existing infrastructure and enhances the role of the Trans-Balkan route for strengthening the security of supply across the region and for further enhancing the integration of our energy markets.

We would like to draw your attention to our dedicated involvement in several regional joint initiatives addressing regulatory and market barriers. Discussions have been started between the TSOs for tariff optimization, as well as on enabling other potential supply routes from the region to Ukraine. The TSOs have introduced and tested, for a limited period of time, the draft gas quality requirements developed under the MoU for harmonization of gas quality requirements in the CESEC region, thus providing additional grounds for their adoption in the whole region. Conditional products with substantial tariff reduction covering a respective section of the route have been introduced by GTSOU and VMTG, while Bulgartransgaz has removed its flow-based transmission component for the coming 5-year regulatory period. Bulgartransgaz and DESFA are investing in expanding the capabilities of their networks in order to increase the transmission capacities from South to North. However, these examples are only steps towards a long-term, even permanent solution, which would require more time to be achieved.

Nevertheless, urgent actions are still needed with immediate effect for the coming winter and next injection season.

With regard to the above, the concerned TSOs are proposing a prolongation until the end of the gas year 2025/2026 of the optimized 'Route 1' product as a short-term solution in order to satisfy the urgent needs of Ukraine (Concept paper is presented in Annex 1). This optimized solution takes account of the feedback received in the last months from various market participants, including for higher discounts, where possible and justifiable.

Adopting this solution will contribute to avoiding a potential energy crisis in Ukraine and negative impacts on the regional gas market (and consecutively – electricity market) during the upcoming winter season and next injection season. This solution is based on using diversified gas sources in line with European rules and requirements for competition, sustainability and solidarity.

This joint solidarity action will contribute to the strategical aims for improving energy security and ensuring alternative and affordable energy supplies for Ukraine.

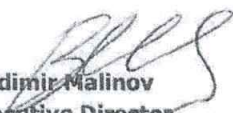
With regard to the above, with the present application and the concept presented in Annex 1, Bulgartransgaz, DESFA, Gas TSO of Ukraine, Transgaz and VestMoldtransgaz kindly request the Energy and Waters Regulatory Commission of Bulgaria, the Regulatory Authority for Energy, Waste and Water of Greece, the National Energy and Utilities Regulatory Commission of Ukraine, the National Energy Regulatory Authority of Romania and the



National Agency for Energy Regulation of Moldova to approve the prolongation of the 'Route 1' product, as described in the concept attached to this letter.

The accelerated and timely approval by the National Regulatory Authorities is of key importance for the implementation of the concept, for ensuring the necessary flows to Ukraine during the upcoming winter and next injection season. In this regard, we kindly and jointly ask you for your approval of the proposed prolongation for gas year 2025/2026 of the temporary monthly capacity product 'Route 1' as soon as possible.

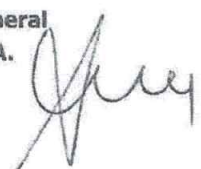
Yours sincerely,



Vladimir Malinov  
Executive Director  
Bulgartransgaz EAD




Maria-Rita Galli  
CEO  
DESFA S.A.



Ion Sterian  
Director General  
Transgaz S.A.



Vladyslav Medvediev  
Acting CEO  
Gas Transmission System Operator of Ukraine LLC



Mihai Leahu  
Chairman of the Board  
VestMoldTransgaz SRL



Concept for a route product for transmission of natural gas 'Route 1' from Greece to Ukraine through the Interconnection Points: Kulata/Sidirokastron, Negru Voda/Kardam, Isaccea/Orlovka, Kaushany and Grebenyky

Taking into consideration

1. That a significant share of the capacity offered by the TSOs of Greece, Bulgaria, Romania, Republic of Moldova and Ukraine in the Interconnection Points Kulata / Sidirokastron, Negru Voda / Kardam, Isaccea / Orlovka, Kaushany and Grebenyky for transporting gas from south to north through the trans-Balkan pipeline remains unsold, thus resulting to the underutilization of said infrastructure.
2. The increase of utilization rate of the afore – mentioned infrastructure will be to the benefit of gas markets participants in Greece, Bulgaria, Romania, Republic of Moldova and Ukraine, since it would lead to a reduction of transportation tariffs of the respective gas transmission systems, due to the increased revenues that will be born from the sale of the so far unused capacity.
3. The need for Ukraine to gain access to secure, affordable, diversified and reliable gas supplies for satisfying its market needs and filling-up their underground gas storage facilities, considering also the difficulties the country faces due to the ongoing war with Russia.
4. The need of Moldova to diversify its gas supplies and gain access to secure, affordable and reliable energy sources.
5. The public consultation organized by ACER, regarding the revision of the network code on capacity allocation mechanisms in gas transmission systems (Reg. (EU) 2107/459), where, among others, it was examined the possibility to offer capacity at the IPs through auctions implementing the Uniform Price Algorithm, that will be conducted in addition to the auctions foreseen by the said Regulation, as currently in force.

We propose the provision of a special bundled capacity product that will facilitate the transportation of gas imported in Greece to Ukraine.

More specifically, we propose

- (a) the allocation of firm capacity<sup>1</sup> at the Interconnection Points Kulata / Sidirokastron, Negru Voda / Kardam, Isaccea / Orlovka, Kaushany and Grebenyky (product name: Route 1 - Entry Kulata / Sidirokastron, exit Grebenyky), through a single auction that will be conducted in RBP auction platform, being the platform where the capacity of the above IPs is commercialized according to the provisions of the Regulation (EU) 2017/459 (CAM NC).
- (b) 'Route 1' capacity product will be offered for the months November 2025 up to and including September 2026 (i.e. until the end of the Gas Year 2025/2026).
- (c) 'Route 1' capacity product booked at the auctions mentioned in point (a) provides capacity at all relevant IPs along the route on each side of the IPs but shall not provide access to VTPs or national exit points in Bulgaria, Romania and the Republic of Moldova.
- (d) the auctions mentioned in point (a), shall take place the 4<sup>th</sup> Monday of each month for the allocation of capacity in the immediately succeeding month, i.e. one week after the start of the rolling monthly firm capacity auctions, acc. to article 13 of the Reg. (EU) 2017/459. In case one or more rolling monthly capacity auctions for the allocation of capacity at the points mentioned in point (a) above, has not been closed by the 4<sup>th</sup> Monday of a month, then the auction for the allocation of capacity, referred to point (a) here-above, shall be cancelled.
- (e) the Uniform Price Algorithm shall be implemented for the allocation of capacity in Route 1, which secures the completion of the auction within the same day said auction starts, i.e. sufficiently before the use of the relevant capacity starts.
- (f) the capacity that will be offered shall be expressed in kWh/D and shall be calculated as the minimum available at any of the IPs Kulata / Sidirokastron, Negru Voda / Kardam, Isaccea / Orlovka, Kaushany and Grebenyky, meaning the lowest available, after the closing of the respective rolling monthly capacity auction, as per art. 13 of the Reg. (EU) 2017/459.
- (g) capacity holders at Route 1, i.e. entities that will book capacity in the auctions as per point (a) here-above, shall not have access to the Virtual Trading Points of Bulgaria, Romania and the Republic of Moldova.

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<sup>1</sup> DESFA, BULGARTRANGAZ, TRANSGAZ, VESTMOLTRANSGAZ and GTSOUA agree, that for securing firm capacity along Route 1, the concentration of CH<sub>4</sub> measured at the IPs Kulata / Sidirokastron, Negru Voda / Kardam, Isaccea / Orlovka, Caushany and Grebenyky, shall not be lower than 85% mole.

- (h) capacity holders at Route 1 shall submit nominations / re-nominations to all five TSOs (namely Gas TSO of Ukraine, Vestmoldtransgaz, Transgaz, Bulgartransgaz and DESFA), according to Chapter IV of the Reg. (EU) 312/2014 (BAL NC). In case of mismatch the “lesser of” rule shall be applied among the IPs of Route 1, by the said TSOs.
- (i) the capacity of Route 1 shall be offered at a reserve price equal to the sum of the reserve prices, expressed in EURO/kWh/D (considering the exchange rate public by the national bank of each country, as relevant, on the day immediately preceding the auction day) applicable for the provision of monthly capacity at the IPs Kulata / Sidirokastron, Negru Voda / Kardam, Isaccea / Orlovka, Kaushany and Grebenyky, discounted by 25% for DESFA and Bulgartransgaz, 50% for Transgaz and Vestmoldtransgaz and 46% for GTSOU, due to the restriction imposed to the respective capacity holders to access the VTPs and national exit points of, Bulgaria, Romania and the Republic of Moldova.



**От:** Sotirios Bravos <S.BRAVOS@DESFA.GR>  
**Отправлено:** Friday, October 3, 2025 1:11 PM  
**Кому:** dker@dker.bg; info@rae.gr; anre@anre.ro; anre@anre.md; box@nerc.gov.ua  
**Копия:** Vladimir Malinov; ion.sterian@transgaz.ro; Maria Rita Galli; Michalis Thomadakis; marius.lupean@transgaz.ro; medvedev-vs@tsoua.com; mihai.leahu@transgaz.ro; prokofev-ag@tsoua.com; rybachuk-vv@tsoua.com; simona.dragomir@transgaz.ro; alexandra.fodor@transgaz.ro; cabinet@transgaz.ro; bogdan.andronic@transgaz.ro; bucur.neagu@transgaz.ro; cristina.iancu@transgaz.ro; Venelin Fachikov; irina.stefan@transgaz.ro; florin.bunea@transgaz.ro; Nikola.Delev  
**Тема:** RE: Concept for a route product for transmission of natural gas 'Route 1' from Greece to Ukraine through the Interconnection Points: Kulata/Sidirokastron, Negru Voda/Kardam, Isaccea/Orlovka, Kaushany and Grebenyky  
**Вложения:** Route1\_to\_UA\_Ext\_Letter.pdf; VC\_to\_Ukraine\_Route1Ext.pdf

Dear Mr. Mladenovski,  
Dear Mr. Furlaris,  
Dear Mr. Vlasenko,  
Dear Mr. Niculescu,  
Dear Mr. Taran,

Please find attached a joint letter from the CEOs of the gas transmission system operators Bulgartransgaz EAD (Bulgaria), DESFA SA (Greece), VestMoldTransgaz SRL (Moldova), Transgaz SA (Romania), and Gas TSO of Ukraine (Ukraine) on the prolongation of the provision of Route 1 Special capacity product for transmission of natural gas from Greece to Ukraine through the Interconnection Points: Kulata/Sidirokastron, Negru Voda/Kardam, Isaccea/Orlovka, Kaushany and Grebenyky, up to and including September 2026.

The revised concept document is also attached.

Kind regards,



[www.desfa.gr](http://www.desfa.gr)

**Sotirios Bravos**

Chief Officer

Commercial Services

T: +30 213 088 4370

M: +30 6949 124 750

[s.bravos@desfa.gr](mailto:s.bravos@desfa.gr)

357-359, Messogion Avenue,

152 31, Chalandri, Attica, Greece



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**From:** Nikola Delev <Nikola.Delev@bulgartransgaz.bg>

**Sent:** Friday, May 16, 2025 8:40 PM

**To:** dker@dker.bg; info@rae.gr; anre@anre.ro; anre@anre.md; box@nerc.gov.ua

**Cc:** Vladimir Malinov <Vladimir.Malinov@bulgartransgaz.bg>; ion.sterian@transgaz.ro; Maria Rita Galli <m.galli@DESFA.GR>; Michalis Thomadakis <m.thomadakis@DESFA.GR>; marius.lupean@transgaz.ro; medvedev-vs@tsoua.com; mihai.leahu@transgaz.ro; prokofev-ag@tsoua.com; rybachuk-vv@tsoua.com; Sotirios Bravos

<S.BRAVOS@DESFA.GR>; simona.dragomir@transgaz.ro; alexandra.fodor@transgaz.ro; cabinet@transgaz.ro; bogdan.andronic@transgaz.ro; bucur.neagu@transgaz.ro; cristina.iancu@transgaz.ro; Venelin Fachikov <Venelin.Fachikov@bulgartransgaz.bg>; irina.stefan@transgaz.ro; florin.bunea@transgaz.ro

**Subject:** Concept for a route product for transmission of natural gas 'Route 1' from Greece to Ukraine through the Interconnection Points: Kulata/Sidirokastron, Negru Voda/Kardam, Isaccea/Orlovka, Kaushany and Grebenyky

Dear Mr. Mladenovski,  
Dear Mr. Furlaris,  
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Dear Mr. Niculescu,  
Dear Mr. Taran,

Please find attached a joint letter from the CEOs of the gas transmission system operators Bulgartransgaz EAD (Bulgaria), DESFA SA (Greece), VestMoldTransgaz SRL (Moldova), Transgaz SA (Romania), and Gas TSO of Ukraine (Ukraine) with regard to a Concept for a route product for transmission of natural gas 'Route 1' from Greece to Ukraine through the Interconnection Points: Kulata/Sidirokastron, Negru Voda/Kardam, Isaccea/Orlovka, Kaushany and Grebenyky.

The letter is sent in two copies - one electronically signed by Ms Galli, Mr. Malinov, Mr. Sterian and Mr. Leahu, as well as one scanned copy with the signature of Mr. Medvediev.

The concept document is also attached.

Kind regards,

Nikola Delev

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Nikola Delev  
Director 'Strategic Planning and Development'  
"Bulgartransgaz" EAD

e-mail: nikola.delev@bulgartransgaz.bg  
tel: +359 2 939 6674  
mob: +359 886 036 436  
[www.bulgartransgaz.bg](http://www.bulgartransgaz.bg)

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[dlzd@bulgartransgaz.bg](mailto:dlzd@bulgartransgaz.bg).

Thank you for your cooperation!"

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Благодаря Ви за съдействието!"



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