Demand Assessment Report
for incremental capacity
between DESFA and ICGB gas Transmission Systems,
where no non-binding demand indications were received

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This report is a joint assessment of the potential for incremental capacity projects conducted by:

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Table of Contents

Currently, the gas transmission systems on Bulgarian ("**BG**") and Greek ("**GR**") territories are interconnected in two areas. The Interconnection Point ("**IP**"), which is a subject to the current Demand Assessment Report ("**DAR**"), is located in the area of Komotini (GR) connecting the national Greek Gas Transmission System ("**DESFA System**") operated by the Hellenic Gas Transmission System Operator S.A. (**DESFA**) with the Interconnector Greece-Bulgaria ("**IGB pipeline**"), operated by ICGB AD ("**ICGB**"), namely **Komotini – DESFA / IGB** (EIC Code: 21Z0000000005398)[1]. This DAR refers explicitly to the Komotini – DESFA / IGB IP, between DESFA and ICGB in the area of Komotini (GR).

IGB pipeline became operational in October 2022, enabling additional gas flows from the Greek territory to be transmitted to Bulgaria. The commercial operation of the IP Komotini – DESFA / IGB started on October 1st, 2024. ICGB operates under specific regulatory regime pursuant to *Final Joint Decision of the Energy Regulators on the Exemption Application of ICGB AD dated August 2018* (and the amendments to it)[2], establishing possibility for upgrading the IGB capacity to approximately 5 bcm/y. In addition to the connection with DESFA System, IGB pipeline is also connected to the gas transmission system of Trans Adriatic Pipeline AG ("**TAP**") in the area of Komotini (GR) through a separate IP, which is not part of this DAR.

A. Non-binding demand indications

DESFA and **ICGB** (the "**TSOs**") have launched the Demand Assessment of the Incremental Capacity Process in July 2025, in line with the provisions of Article 26 of Commission Regulation (EU) 2017/459 of 16 March 2017[3] ("**CAM NC**").

According to the provisions of CAM NC, on July 7th, 2025, the TSOs invited all interested parties to submit non-binding demand indications for incremental capacity at existing or

[1] *Another IP is in the area of Kulata (BG)/Sidirokastro (GR) on the Greek-Bulgarian border, connecting the Gas Transmission System, operated by Bulgartransgaz EAD, with the DESFA System.*

[2] *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* .

[3] *Commission Regulation (EU) 2017/459 of 16 March 2017 establishing a network code on capacity allocation mechanisms in gas transmission systems and repealing Regulation (EU) No 984/2013.*

new IPs in the following application windows in accordance with CAM NC:

a) non-binding demand indications <u>within 8 weeks</u> after the start of the annual yearly capacity auction on 7th July 2025.

b) non-binding demand indications <u>later than 8 weeks</u> after the start of the annual yearly capacity auction on 7th July 2025, to be considered in the current incremental capacity cycle.

The involved TSOs, DESFA and ICGB, have not received any non-binding demand indications for firm capacity at the interconnection point between the entry-exit system of ICGB and the entry-exit system of DESFA. Therefore, zero amount for non-binding demand indications has been used as a basis for this demand assessment.

B. Demand assessment

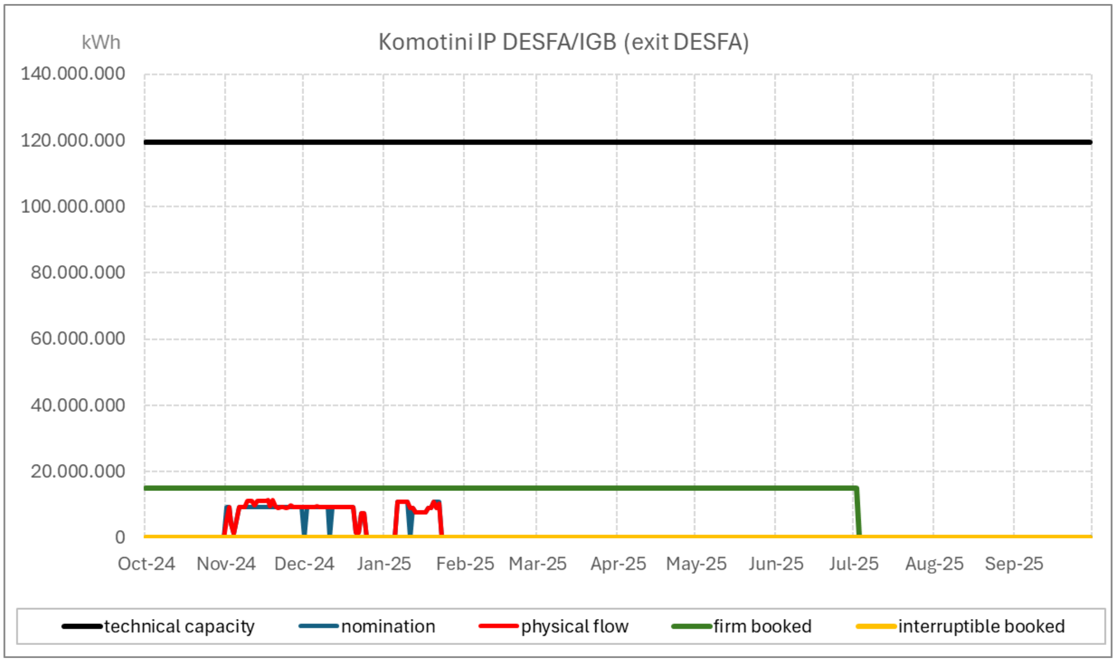
The Demand Assessment commenced immediately after the start of the annual yearly capacity auction as specified in Article 11(4) of CAM NC, and closed maximum 16 weeks after the start of the annual yearly capacity auction in accordance with Article 26 of CAM NC. The interested parties had the opportunity to submit non-binding demand indications to quantify potential demand for incremental capacity in compliance with the timeline provided by Article 26 CAM NC.

i. Historical usage pattern

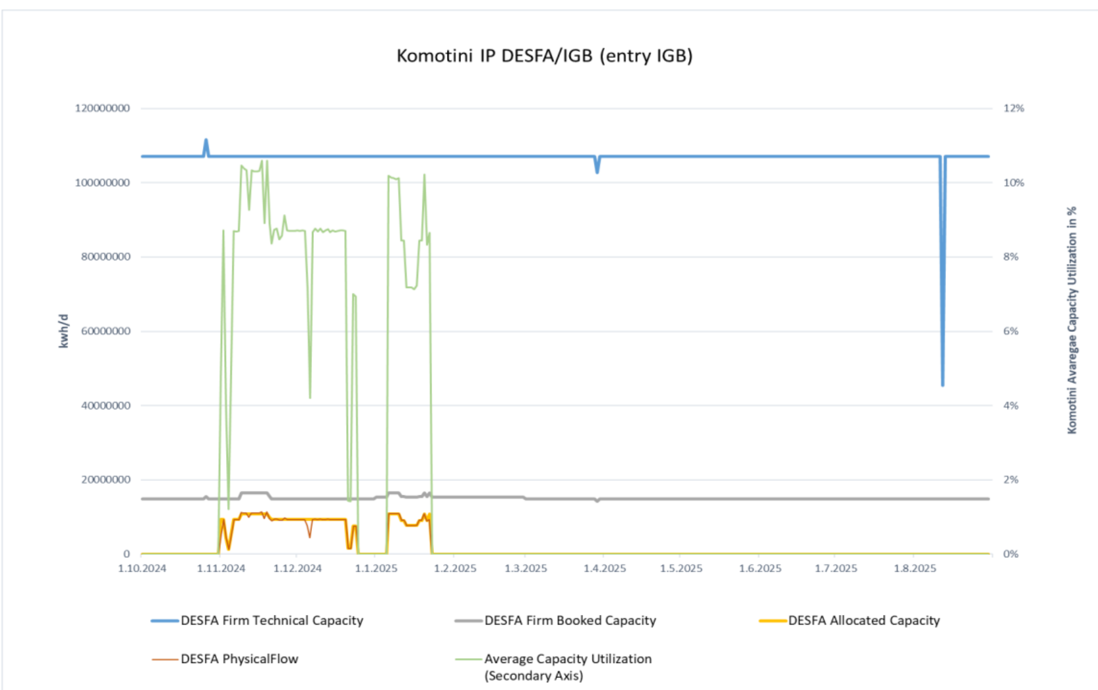
The utilization of the capacity of the Interconnection Point Komotini – DESFA / IGB is presented in the graphs below[4]. The technical capacity, the booked capacity, as well as the nominated quantities but also the actual physical flow, for the previous 2 years, are presented.

[4] *ENTSOG Transparency Platform data was used for the preparation of the graphs.*

Graph 1: IP Komotini – DESFA / IGB exit Greece [kWh/d]



Graph 2: IP Komotini – DESFA / IGB entry Bulgaria [kWh/d]



ii. Results of current annual yearly auction

- DESFA

In the recent DESFA annual yearly firm capacity auction that took place on 07.07.2025 for the IP Komotini DESFA/IGB, the following results have been achieved:

IP Name	IP EIC Code	Flow Direction	Gas Year	Offered Capacity (kwh/d/y)	Booked Capacity (kwh/d/y)	Capacity Type
Komotini - DESFA / IGB	**21Z0000000005398**	**Exit DESFA / Entry ICGB**	2025/2026	62.141.475	0	**Bzk**
			2026/2027	62.141.475	0	
			2027/2028	62.141.475	0	
			2028/2029	71.470.800	0	
			2029/2030	71.470.800	0	

- ICGB

In the recent ICGB annual yearly firm capacity auction that took place on 07.07.2025 for the IP Komotini DESFA/IGB, the following results have been achieved:

IP Name	IP EIC Code	Flow Direction	Gas Year	Offered Capacity (kwh/d/y)	Booked Capacity (kwh/d/y)	Capacity Type
Komotini - DESFA / IGB	**21Z0000000005398**	**Exit DESFA / Entry ICGB**	2025/2026	42.795.335	0	**Firm, forward**
			2026/2027	42.795.335	0	
			2027/2028	42.121.639	0	
			2028/2029	53.527.212	0	
			2029/2030	53.527.212	0	

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

The expected demand level for incremental capacity at the interconnection point Komotini – DESFA / IGB, between DESFA and IGB entry-exit systems, for the future period, is zero. No demand indications have been received as presented in section A. The available capacity (i.e. technical and/or interruptible capacity which is not yet booked), are considered sufficient to cover potential need for incremental capacity in the period before the start of the next incremental process, in 2027. It is mentioned that there is also the possibility to use Congestion Management Procedures (CMP) procedures if needed.

C. Conclusion for the non-initiation of an incremental capacity project

According to the assessment result of the non-binding demand indications and the historical usage patterns, which already indicated that no demand levels for incremental capacity need to be developed, **no incremental capacity project will be initiated. Based on the aforementioned decision, no technical studies for incremental capacity projects will be conducted.**

D. Fees

For Incremental Capacity Process - 2025 addressed by this report, neither ICGB, nor DESFA introduced a fee for the evaluation and processing of non-binding demand indications.

E. Contact information

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