ECRB Market Monitoring Report

Gas and Electricity Retail Markets in the Energy Community

Reporting period 2024

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INTRODUCTION

After 20 years of energy market reforms and adoption of 2021 Decarbonisation Roadmap[1] and the Electricity Integration Package,[2] the focus of the Energy Community shifted towards stronger market integration and transformation of energy systems. In the retail sector, new solutions to engage and empower consumers are being developed. The regulatory authorities are strongly involved in designing the effective retail market framework, but also perform regular market monitoring, to gain in-depth knowledge of market performance, stakeholder activities and development trends. Promoting carbon neutrality, competition, customer protection, energy efficiency, investments and security of supply at the same time is the key driver of their activities. The relevance of regulatory market monitoring is not only recognized by the Energy Community *acquis communautaire* (hereinafter 'acquis') but is also since years a central activity of the Energy Community Regulatory Board (ECRB).[3]

The present report covers the Energy Community Contracting Parties ('Contracting Parties') Albania, Bosnia and Herzegovina, Georgia, Kosovo*,[4] Moldova, Montenegro, North Macedonia, Serbia and Ukraine. It describes the status quo of electricity and gas markets on retail level with the aim to identify potential barriers and recommend improvements.

Data presented in this report refers to the year 2024.

This report was prepared by the ECRB Customers and Retail Markets Working Group, within the Task Force Retail Market Monitoring led by Mr. Aca Vuckovic (AERS, Serbia) and Mr. Volodymyr Buchyk (NEURC, Ukraine). The active participation and inputs of all Energy Community Regulatory Authorities were vital to the successful completion of this work.

[1] General Policy Guidelines 01/2021/MC-EnC Decarbonisation Roadmap for the Contracting Parties of the Energy Community

[2] https://www.energy-community.org/implementation/package/EL.html

[3] ECRB operates based on the Treaty establishing the Energy Community (Energy Community Treaty). As an institution of the Energy Community, the ECRB advises the Energy Community Ministerial Council and Permanent High Level Group on details of statutory, technical and regulatory rules and makes recommendations in the case of cross-border disputes between regulators. For more information about ECRB consult www.energy-community.org – about us – institutions – regulatory board. Previous editions of the ECRB annual retail market monitoring report are available at https://www.energy-community.org/documents/ECRB.html

[4] Throughout this document, the symbol * refers to the following statement: This designation is without prejudice to positions on status, and is in line with UNSCR 1244 and the ICJ Advisory Opinion on the Kosovo declaration of independence.

FINDINGS: ELECTRICITY

This chapter provides a status review of the analysed retail electricity markets as regards demand data, the supply market structure, switching behaviour of end-customers as well as end-user electricity prices and their regulation.

1. Electricity retail market characteristics

In 2024, the total sale of electricity to final customers increased by 1.71% compared to 2023. This comparison with the previous year is not fully relevant, due to the war in Ukraine.[5] In the Energy Community without data for Ukraine, the total sale of electricity to final customers increased by 3.94% and increase was registered in all Contracting Parties. The highest increase of electricity consumption was in Georgia (7.72%) and Moldova (7.47%). The lowest increase was in North Macedonia (1.00%). Electricity consumption increased in Albania (4.92%), Kosovo* (4.72%), Bosnia and Herzegovina (4.56%), Montenegro (2.98%) and Serbia (2.70%).

The electricity consumption of both households and non-households in the Energy Community without Ukraine increased: consumption of households increased by 4.44%,[6] and consumption of non-household customers increased by 3.50%.[7]

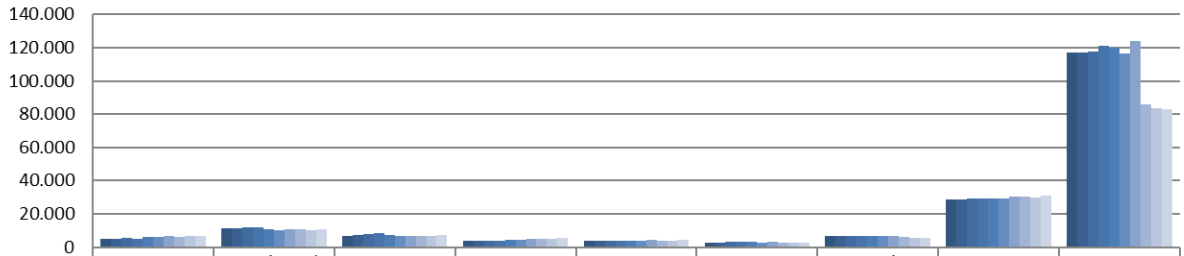
The figures below show the total electricity sales to final customers in the period 2015 – 2024, presented with and without data for Ukraine.

[5] Data for 2023 and 2024 do not include the whole territory of Ukraine. War conditions affected the change in total electricity consumption which in 2024 compared to 2023 decreased by 0.19% – electricity consumption of households decreased by 4.78% but consumption of non-household increased by 2.62%.

[6] The consumption of households increased in all Contracting Parties - the highest increase was in Moldova 11.78%, in Albania 9.41%, Georgia 7.56%, Kosovo* 5.35%, Montenegro 5.17%, North Macedonia 2.50% and Serbia 1.67%

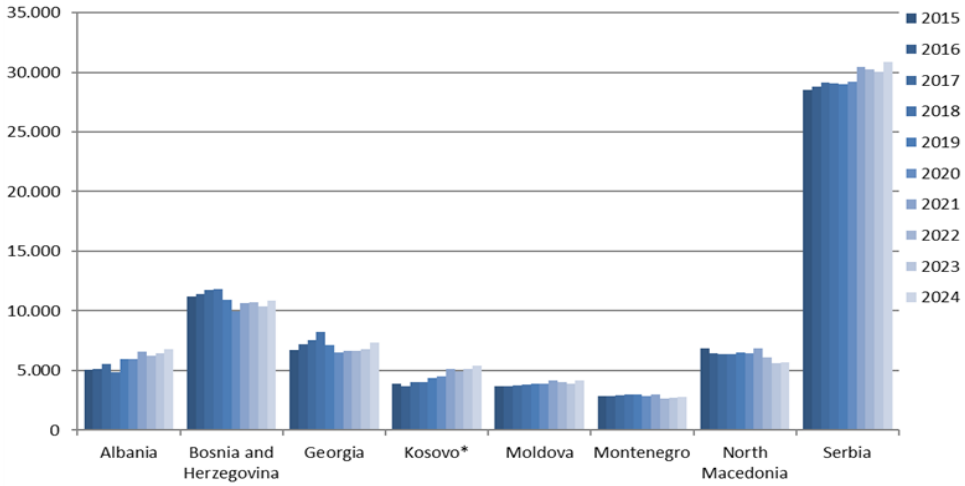
[7] The increase of non-households' consumption in the EnC was 3.50% - whereby consumption decreased only in North Macedonia by 0.73%, while in all other Contracting Parties consumption of non/household was increased - in Georgia 7.83%, Moldova 4.41%, Bosnia and Herzegovina 4.30%, Kosovo* 3.74%, Serbia 3.49%, Albania 0.72% and Montenegro 0.39%.

Figure 1 *Total electricity sale to final customers in GWh 2015 – 2024*



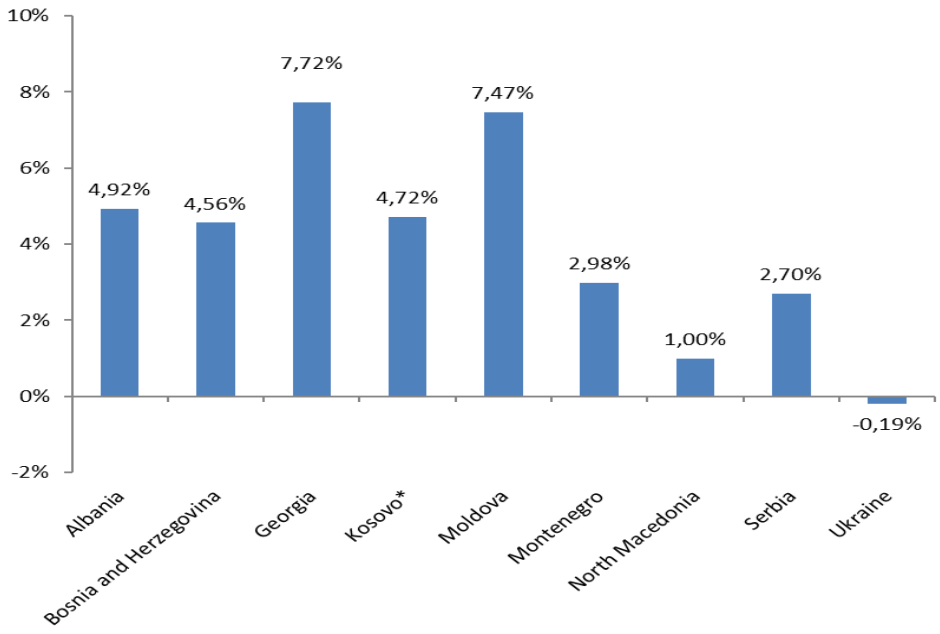
	Albania	Bosnia and Herzegovina	Georgia	Kosovo*	Moldova	Montenegro	North Macedonia	Serbia	Ukraine
2015	5.069	11.183	6.731	3.860	3.717	2.875	6.853	28.531	117.140
2016	5.108	11.432	7.225	3.686	3.669	2.825	6.455	28.819	116.873
2017	5.563	11.735	7.582	4.008	3.730	2.945	6.377	29.121	117.528
2018	4.884	11.793	8.234	4.022	3.855	2.991	6.395	29.038	120.842
2019	5.960	10.960	7.147	4.408	3.875	2.967	6.504	29.007	119.864
2020	5.959	9.971	6.502	4.536	3.866	2.849	6.475	29.219	116.251
2021	6.601	10.673	6.621	5.117	4.156	2.975	6.865	30.458	123.723
2022	6.266	10.739	6.644	4.925	4.050	2.620	6.133	30.242	86.088
2023	6.441	10.356	6.800	5.161	3.888	2.695	5.603	30.021	83.334
2024	6.758	10.828	7.325	5.404	4.178	2.776	5.659	30.832	83.177

Figure 2 *Total electricity sale to final customers in GWh 2015 – 2024 (excluding Ukraine)*



The following figure shows the growth rates of the total of electricity sales to final customers in the Contracting Parties from 2023 to 2024.

Figure 3 *Electricity demand growth rates 2023 to 2024*

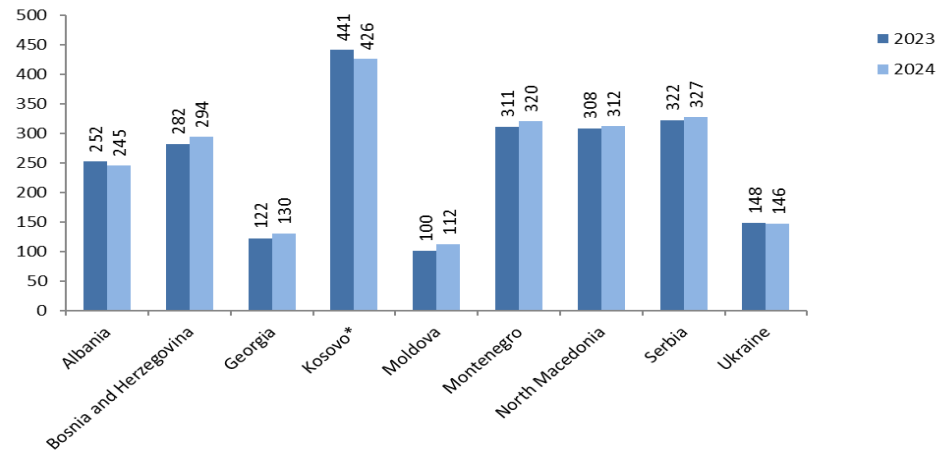


The average monthly consumption of electricity per household[8] varies among the Contracting Parties. Similar to the previous year, in 2024, the lowest consumption was registered in Moldova (112 kWh/month) and Georgia (130 kWh/month), and the highest in Kosovo* (426 kWh/month). In the period 2023 – 2024, in the most of Contracting Parties consumption of electricity per household increased.[9] Average monthly consumption of electricity per household in 2023 and 2024 are displayed in the figure below.

[8] In the calculation of average monthly consumption of electricity per household, the number of households is equal to the number of metering points. Number of households include all customers, regardless of the fact if they used electricity or not.

[9] Average monthly consumption of electricity per household increased between 1.11% in North Macedonia and 6.78% in Georgia. Average monthly consumption of electricity per household decreased in Albania (2.81%) and Kosovo* (3.45%) Decrease of this consumption in Ukraine was 1.21%, and the war conditions must be taken into account when assessing this decreasing.

Figure 4 *Average monthly consumption of electricity per household in 2023 and 2024 (kWh)*



In all Contracting Parties, except Georgia, licenses have to be issued for the activity of supply of electricity to end-users. In Georgia, as of 1 July 2021, licenses are not issued for supply activities.

During 2024, in Ukraine, the total number of licensed suppliers in the retail market significantly increased – by 87 compared to the previous year. The total number of licensed electricity suppliers in the retail market increased in Moldova by 11, up to 10 more suppliers were registered in Albania, Bosnia and Herzegovina, Kosovo* and Serbia, while in Montenegro the number of licensed suppliers did not change in 2024 in comparison to 2023. Only in North Macedonia, the total number of licensed electricity suppliers in the retail market decreased by 7 compared to 2023.

Not all licensed suppliers were active in the retail markets in 2024. Table 1 below provides information on the number of licensed and active suppliers in 2024 as well as on the change in number of active suppliers between 2023 and 2024. In all Contracting Parties, all suppliers are allowed to offer products on the whole territory.[10] Only in Kosovo*, there is one supplier being licensed for only four municipalities.

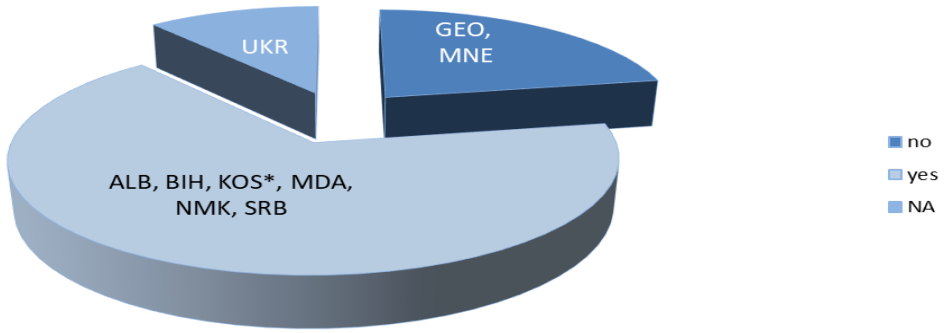
[10] Nationwide supplier means a supplier offering its products on the whole territory of a country. In Bosnia and Herzegovina and Ukraine, the universal suppliers are entitled to sell electricity only to the customers in the designated area, however when not providing universal service, these suppliers are also allowed to supply customers on the whole territory of the country.

Table 1 *Number of active suppliers in retail electricity markets in 2024*

	Number of licensed electricity suppliers	Total number of active electricity suppliers	Number of active nationwide suppliers	Number of net new active nationwide suppliers[11]
Albania	36	13	13	4
Bosnia and Herzegovina	29	7	7	0
Georgia	n.a.[12]	3	1	1
Kosovo*	19	6	5	2
Moldova	89	4	4	-1
Montenegro	6	1	1	0
North Macedonia	125	22	22	0
Serbia	79	11	11	8
Ukraine	1,301	366	366	13

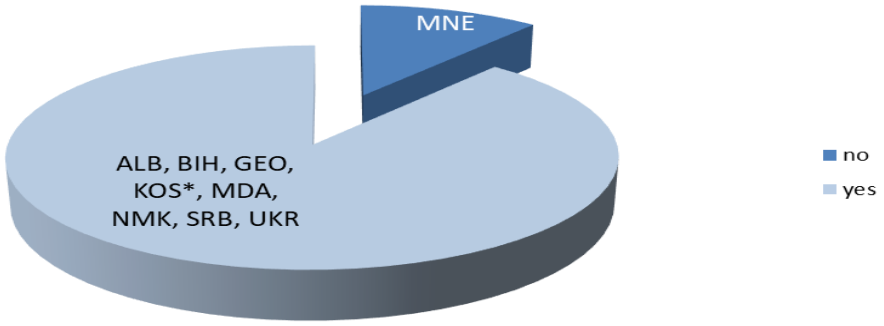
The figures below show information on whether more than one supplier (i.e. the incumbent) was supplying customers connected to the transmission or distribution network in 2024.

Figure 5 *Are there electricity suppliers other than incumbent supplying customers connected to the transmission network?*[13]



[11] Net means the number of entries minus the number of exiting suppliers in the market.
[12] License not required for the electricity retail supply.
[13] No information for Ukraine for 2024

Figure 6 *Are there electricity suppliers other than incumbent supplying customers connected to the distribution network?*



In order to accomplish the picture of retail electricity markets from supply side, concentration and openness of markets have been investigated. Results are presented in the table hereinafter. The information can be explained in the following way:

- In Albania 13 suppliers were active in the retail market in 2024. There was only one supplier selling at least 5% of the total electricity consumed by final customers. Three largest retail suppliers covered 87.93% of the total electricity consumption.
- In Bosnia and Herzegovina, seven suppliers were active in the retail market in 2024. There were three retailers selling at least 5% of the total electricity consumed by final customers, with a joint market share of 97.60%.
- In Georgia, since the end of 2017, two companies, regional and incumbent, supplied all end-users till 2024. In 2024, one supplier entered retail market with market share of 0.2%. The market share of these companies is 100%.
- In Kosovo*, there were six active suppliers of electricity. There was only one supplier selling at least 5% of the total electricity consumed by final customers. Three largest retail suppliers covered 98.98% of the total electricity consumption.
- In Moldova, there were four retail electricity suppliers active in the retail market. Two of them were selling at least 5% of total electricity consumed by final customers in 2024. Three largest retail suppliers covered 99.85% of the total sale of electricity on the retail market.
- In Montenegro, only one retail electricity supplier was active in the market.
- In North Macedonia, there were 22 active suppliers and four of them were selling at least 5% of total electricity consumed by final customers in 2024 (market share of the largest supplier was 61.56%). The market share of the three largest electricity suppliers was 86.15%.

- In Serbia, there were 11 active suppliers. The great majority of customers were supplied by the incumbent supplier having the market share of 98.20% of the total sale of electricity to end customers and only this supplier sold more than 5% of total electricity consumed by final customers in 2024.
- The largest number of electricity suppliers are operating in Ukraine – there were 366 active suppliers on the retail electricity market in 2024. Only three suppliers were selling at least 5% of total electricity consumed by final customers in 2024, with a joint market share of 25.08% of the total sale of electricity on the retail market (the market share of the largest supplier was 12.59%).

Table 2 *Electricity retail market concentration and market opening in 2024*

	Number of electricity retailers selling at least 5% of total electricity consumed by final customers	Market share of the 3 largest companies in the retail market (aggregated) in %	Estimated incumbent market share in the household market, in % of annual consumption
Albania	1	87.93%	100.00%
Bosnia and Herzegovina	3	97.60%	100.00%
Georgia	2	100.00%	100.00%
Kosovo*	1	98.98%	100.00%
Moldova	2	99.85%	100.00%
Montenegro	1	100.00%	100.00%
North Macedonia	4	86.15%	100.00%
Serbia	1	99.47%	100.00%
Ukraine	3	25.08%	100.00%

2. Switching behaviour

The switching rate is one of the commonly used indicators for measuring market competitiveness. However, its interpretation has to be done carefully by taking into consideration relevant legislative and regulatory provisions as well as the structure of the markets.

All customers in the Contracting Parties, except Albania, are eligible to choose their supplier. However, all households and some commercial customer categories in several Contracting Parties are entitled to be supplied at regulated prices (see Chapter 5).

In order to better understand switching rates in the analysed markets, it is worth mentioning that in some Contracting Parties some of the customers (mainly according to the voltage level of connection to the network, electricity consumption and which are not households or small customers) were obliged to leave the regulated market and choose a supplier. This obligation is defined in Albania, Bosnia and Herzegovina, Georgia, Kosovo*, North Macedonia, Montenegro, Serbia and Ukraine.

The table below shows the **switching rates,** measured by using the numbers of metering points, in the analysed markets in 2024. Data refers to the definition of switching as the free move of a customer from one to another supplier; i.e. the change of incumbent supplier due to the obligation to leave the regulated market defined in the law is not included in the data.

Table 3 *Annual switching rates in electricity markets in 2024 (in %)*[14]

	Number of eligible customers under national legislation/number of customers that switched supplier	Annual switching rate in the whole retail market (by number of meter points)	Annual switching rate of household customers (by number of meter points)	Annual switching rate of non-household customers (by number of meter points)	Annual switching rate in the whole retail market (by volume)	Annual switching rate of household customers (by volume)	Annual switching rate of non-household customers (by volume)
Albania	1,901/0	0%	0%	0%	0%	0%	0%
Bosnia and Herzegovina	1,618,585/4	0.0002%	0%	0.003%	0.14%	0%	0.27%
Georgia	2,032,874/24	0.0012%	0%	0.017%	0.20%	0%	0.33%
Kosovo*	752,609/1	0.0001%	0%	0.001%	1.34%	0%	3.43%
Moldova	1,450,697/18	0.0012%	0%	0.017%	n.a.	0%	n.a.
Montenegro	445,716/0	0%	0%	0%	0%	0%	0%
North Macedonia	924,687/ 10,553	1.14%	0.011%	10,05%	8.21%	0.072%	17.85%
Serbia	3,828,463/ 15,907	0.42%	0.121%	2.60%	0.94%	0.041%	1.60%
Ukraine[15]	17,726,939/ 286,458	24.71%	n.a.	n.a.	n.a.	n.a.	n.a.

[14] "n.a." stands for "not available" and means that data was not collected. Switching rates are calculated as share in % of total consumption (or number) of customers.
[15] For Ukraine data for non-households is provided in number of customers and not in metering points. Accordingly, such data cannot be used to calculate certain supplier-switching indicators, as they will not ensure comparability with data from other countries.

In Albania and Montenegro, there was no supplier switching in 2024. A very small number of eligible customers changed their suppliers in Bosnia and Herzegovina, Georgia, Moldova and Kosovo*. In North Macedonia, Serbia and Ukraine, on several thousand metering points customers changed their suppliers. The annual switching rate in the whole retail market calculated by number of metering points was 1.14% in North Macedonia, and less than 1% in Serbia.[16] However, when the annual switching rate in the whole retail market is calculated by volume of non-household consumption, the relevant rates were 17.85% in North Macedonia and 1.60% in Serbia. Except for North Macedonia and Serbia, only non-household customers changed their suppliers. In North Macedonia and Serbia, a very small number of household customers left the incumbent electricity supply at regulated prices and chose a new supplier.

The increasing number of switching requests is proof of market liquidity development. In Georgia and Moldova, there were switching requests for the first time in 2024. Only in Serbia this number increased,[17] in North Macedonia and Kosovo* decreased.[18] In Ukraine, the number of switching requests in 2024 was 60,892 but the dynamics cannot be tracked due to the non-availability of data for 2023.

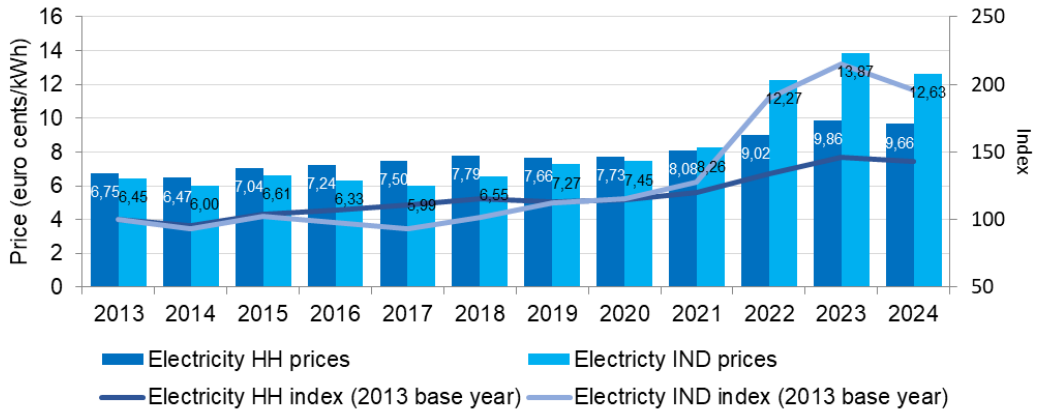
3. End-user electricity prices

In the Energy Community Contracting Parties, excluding Ukraine[19], final average household and industry prices decreased in 2024 when compared to 2023 – by 2% for household segment and 9% for industry. For the fourth year in a row, the average industry price is higher than the average price for households. Having in mind that the household prices in the majority of the Contracting Parties are regulated, this difference points out to an increase in cross-subsidization between the prices for these two categories during and after the crisis.

The average EU household price in 2024 was almost three times higher than the average household price in the Contracting Parties in the same year, while the average industry price in the Contracting Parties was around 26% lower than of the average EU price.

[16] ibid
[17] Number of requests increased in Serbia from 11,947 in 2023 to 15,907 in 2024
[18] Number of requests decreased in North Macedonia from 16,583 in 2023 to 10,553 in 2024, in Kosovo* from 3 in 2023 to 1 in 2024.
[19] Due to the martial law application, the Ukrainian authority for statistics did not provide information on prices to EUROSTAT.

Figure 7 *Trends in final electricity prices for household and industrial consumers in the Contracting Parties, without Ukraine, 2013-2024 (euro cents/kWh and index change 2013=100)*



Source: Energy Community Secretariat calculations based on Eurostat Band DC: 2,500 – 5,000 kWh (household electricity consumption) and Band IE: 20,000 – 70,000 MWh (industrial electricity consumption), October 2025

Note: data for Kosovo and Ukraine not available. The information for average industry prices in Kosovo* is not available on EUROSTAT.*

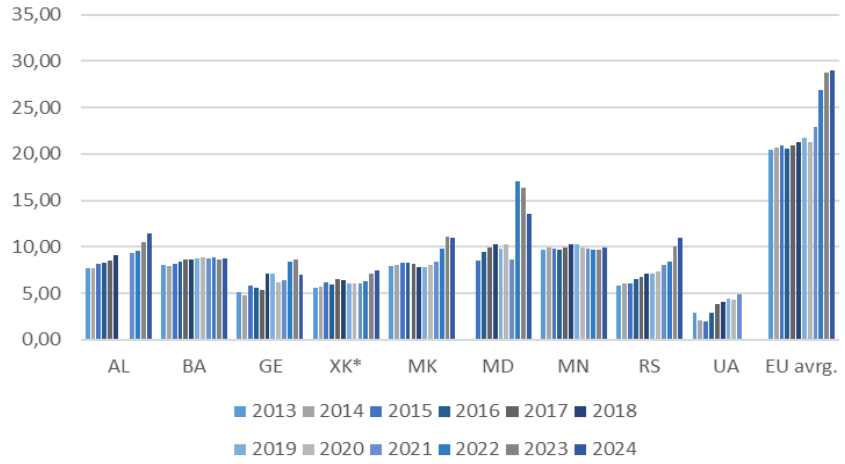
From 2013 to 2024, electricity prices for households in the Contracting Parties excluding Ukraine increased, on average, by 43%, while industrial prices increased on average by 96%.

As in previous years, variations in the electricity price were observed across the Contracting Parties. In 2024, household electricity prices were the highest in Moldova – 13.59 euro cents/kWh and the lowest in Georgia, where the households paid on average 7.03 euro cents/kWh. Still, the household prices in Moldova dropped by 17% in comparison with the previous year. The substantial decrease of average household price occurred in Georgia as well, by 19%. The highest increases in household prices in the period 2023 – 2024 were registered in Albania and Serbia – around 9%. End consumer prices for households were still regulated in all Contracting Parties, except Montenegro, sometimes resulting in prices being set below actual costs. Nevertheless, Montenegro is the only Contracting Party with the almost unchanged household electricity prices since 2013.

In the industry segment of the retail electricity market, the average prices decreased in most of the Contracting Parties, with Moldova registering the most substantial decrease of 27%, followed by North Macedonia and Georgia, with 20% i.e. 17% respectively. In Albania and Bosnia and Herzegovina, the average industry prices increased on a year-to-year basis by close to 8% i.e. 4%. The lowest electricity prices for industrial electricity consumers was in Montenegro, with 6.2 euro cents/kWh on average and the highest in Serbia – 15.78 euro cents/kWh.

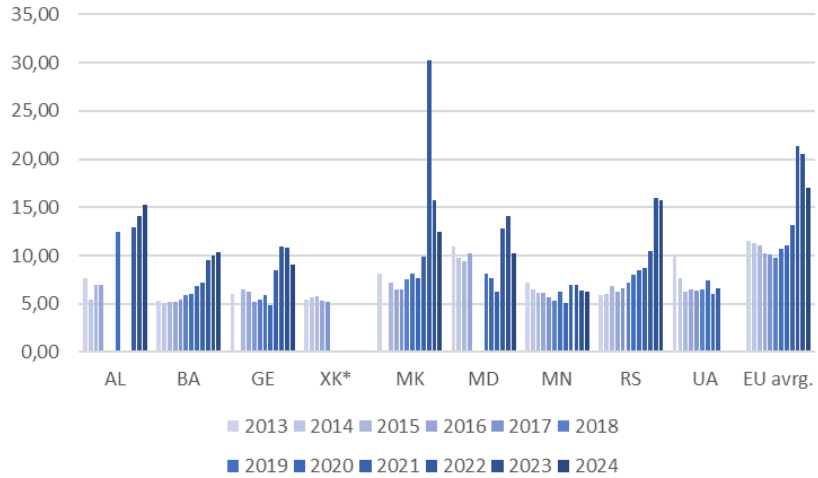
Figures 8 and 9 show the final electricity prices in nominal terms for household and industrial consumers in the Contracting Parties from 2013 to 2024 (in euro cents/kWh).

Figure 8 *Final electricity prices in nominal terms for household consumers in EnC CPs - 2013 – 2024 (euro cents/kWh)*



Source: Energy Community Secretariat calculations based on Eurostat and NRAs. Band DC: 2,500 –5,000 kWh (household electricity consumption), October 2025

Figure 9 *Final electricity prices in nominal terms for industrial consumers in EnC CPs - 2013 – 2024 (euro cents/kWh)*



Source: Energy Community Secretariat calculations based on Eurostat and NRAs. Band IE: 20,000 – 70,000 MWh (industrial electricity consumption), October 2025

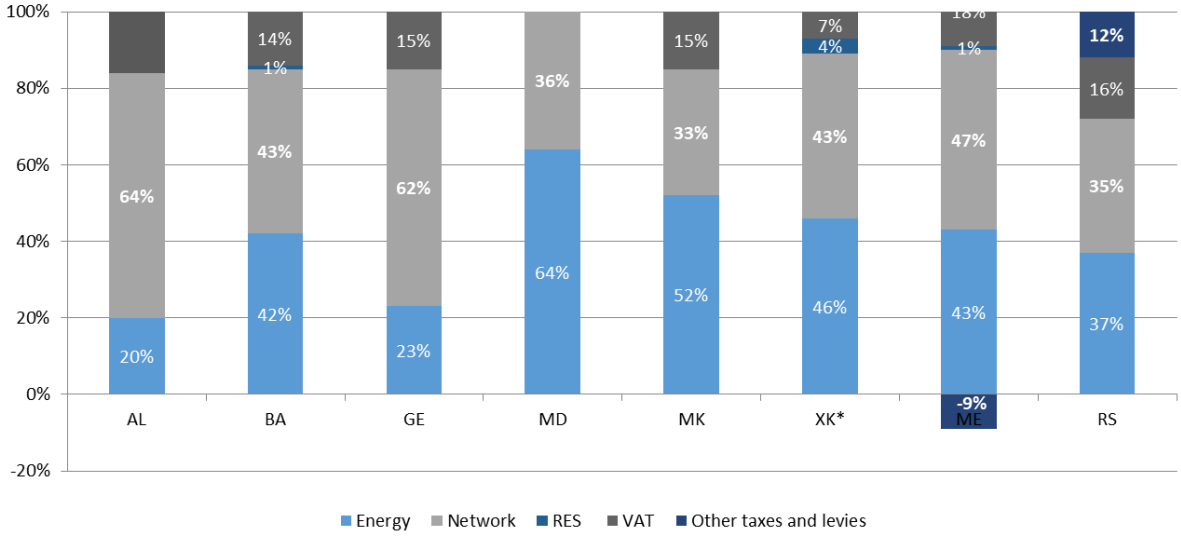
4. Electricity price breakdown for households[20]

Figure 10 shows the breakdown of the final electricity price for households in the Contracting Parties in 2024[21]. The composition of final household electricity price varies widely across the Contracting Parties. The share of the energy component in the final bill was the highest in Moldova (64%) and the lowest in Albania (20%). In the Contracting Parties, the share of network costs in the total household electricity price ranged between 33% in North Macedonia and 64% in Albania.

For three Contracting Parties – Bosnia and Herzegovina, Kosovo* and Montenegro, the share of support for renewable energy ('RES charge') in the household electricity bill is presented separately. In North Macedonia, the RES charge is part of the energy component. In Serbia, the category 'other taxes and levies' includes RES support, energy efficiency support and excise tax. The component 'other taxes and levies' for Montenegro (-6%) refers to the discount on electricity price applied by the incumbent supplier.

Diverse VAT shares correlate to differences in taxation policies in the Contracting Parties. In Moldova, VAT is not charged on electricity prices. In other Contracting Parties, VAT shares range between 7% and 18%.

Figure 10 *Breakdown of electricity prices for households in EnC CPs – 2024*[22]



Source: EnC Secretariat calculations based on Eurostat, Band DC (October 2025)

[20] Information in this chapter was prepared based on EUROSTAT information.
[21] For Ukraine, information for 2024 is not available.

5. Regulation of electricity end-user prices

Household customers were entitled to regulated end-user prices in all Contracting Parties in 2024, except in Montenegro where all categories of consumers are supplied under non- regulated prices.

All household customers were supplied at regulated prices in the analysed markets. The exceptions are Montenegro (see above), North Macedonia and Serbia, where a very small number of household customers left the electricity supply at regulated prices and were supplied under non-regulated prices in 2024.[23]

In Albania, there is no price regulation only for non-households connected to the 35kV network. Customers connected at the 20/10/6 kV voltage level who meet the technical conditions for participation in the liberalized market have been entitled, as of January 1, 2022, to freely choose their electricity supplier. In cases where they are unable to secure a supply agreement with one of the licensed entities operating in this activity, these customers have the right to be supplied with electricity through the Supplier of Last Resort (SOLR) service. About 1% of non-household customers who consumed 58.4% of the electricity consumed by all non-household customers were supplied under non-regulated prices. In Bosnia and Herzegovina, small customers connected to the 0.4 kV network were entitled to supply under regulated end-user electricity prices;[24] for all other customers (about 30% of non-household customers who consumed 78% of the electricity consumed by all non-household customers) prices were not regulated. In Georgia, despite being free to choose their suppliers, non-household consumers connected to 35 – 100 kV and 6 – 10 kV lines, only 24 non-house customers who consumed less than 0.7% of the electricity consumed by all non-household customers, were supplied under non-regulated prices. In Kosovo*, despite that all customers are free to choose their suppliers, 96.77% of all customers continue to be supplied by the universal service supplier at regulated tariffs. About 2.6% of non-household customers who consumed 8.85% of the electricity consumed by all non-household customers were supplied under non-regulated prices and 3.33% of all household customers who consumed 4.27% of the electricity consumed by all household customers were supplied under non-regulated prices. In Moldova only 53 non-house customers who consumed less than 0.3% of the electricity consumed by all non-household customers, were supplied under non-regulated prices. In Montenegro, in 2024, all non-household customers were supplied at non-regulated prices. In North Macedonia, only small consumers[25] were supplied under regulated prices (about 24% of non-household customers supplied at non-regulated prices and they

[23] In Serbia 1,668 of 3,373,023 households supplied at non-regulated prices and in North Macedonia 12,981 of 809,447 households supplied at non-regulated prices. Most of these are apartments, which are owned by legal entities.

[24] Federation BIH: small electricity customers are end customers (legal persons and entrepreneurs) with less than 50 employees, total annual revenue of up to 8 million BAM (1EUR=1.95583BAM), whose facilities are connected to the distribution system at a voltage level lower than 1 kV and whose annual consumption in previous year did not exceed 50,000 kWh;
Republika Srpska and Brcko District: small customer means any customer whose facilities are connected to the distribution system at the voltage level lower than 1 kV and annual consumption in previous year is lower than 35,000 kWh. In addition, small customer fulfils at least two of the three following criteria: (1) it has less than 50 employees, (2) annual income is less than 2 million BAM, (3) value of assets is less than 1 million BAM.

[25] A small electricity consumer is an entity whose average number of employees in the last two accounting years is less than 50 employees and has a total annual income of less than two million euros in Denar counter value, with the exception of electricity producer and transmission system operator and electricity distribution system.

consumed 85.1% of the electricity consumed by all non-household customers). In Serbia, only small customers had the possibility to be supplied at regulated end-user prices;[26] for all other non-household customers (36.5% of non-household customers who consumed more than 93% of the electricity consumed by all non-household customers), prices were not regulated. In Ukraine, only small non-household consumers were supplied under regulated prices.[27] For all other non-household customers (more than 25% of all non-household customers) prices were not regulated and in 2024, those customers were consumed about 91.8% of the electricity consumed by all non-household customers.

Table 4 *Number of non-households (number of metering points) supplied at non-regulated electricity prices in 2023 and 2024*

	Number of non-household customers supplied at non-regulated prices in (number of metering points)	
	2023	2024
Albania	0	1,901
Bosnia and Herzegovina	14,723	39,412
Georgia	0	24
Kosovo*	5	2,787
Moldova	n.a.	53
Montenegro	44,115	45,619
North Macedonia	28,793	25,051
Serbia	175,956	189,504
Ukraine[28]	96,909	144.811

6. Contract offers and dynamic pricing

To enable and facilitate the active participation of consumers in the evolving electricity market, the Contracting Parties must ensure that the national regulatory framework enables suppliers to offer a various range of contracts, including dynamic electricity price contracts. More flexible offers incentivize the uptake of renewable energy and have benefits for grid management. The Electricity Directive requires that dynamic price offers are available to customers who have a

[26] The Energy Law defines small electricity customers are end customers (legal persons and entrepreneurs) with less than 50 employees and a total annual revenue of up to 10 million EUR in dinar counter value whose facilities are all connected to the electricity distribution system at a voltage level lower than 1 kV and whose electricity consumption in the previous year did not exceed 30,000 kWh.
[27] A small non-household customer means a non-household whose electric power installations are connected to an electricity network with a capacity up to 50 kW and who buys electricity for its own consumption. Small non-households have a right for universal service supply with end prices calculated according NEURC's methodology.
[28] Data refer to number of contracts, not metering points.

smart meter installed. Furthermore suppliers that have more than 200,000 final customers will have to offer dynamic price contracts.

So far, in the Contracting Parties, households are offered only fixed price contracts.

Traditionally, the suppliers in many Contracting Parties offer day and night prices for supply to households (Bosnia and Herzegovina, Kosovo*, North Macedonia and Serbia), in Moldova and Montenegro on & off-peak prices were used, while in Ukraine day and night and on & off peak prices were used depend of installed meters which can register consumption in two or three time zones. In Bosnia and Herzegovina (only in the Federation of Bosnia and Herzegovina entity – one of two public i.e. universal supplier) seasonal prices i.e. different prices for different times of year were applied.

In the non-household segment, day and night prices were applied in Bosnia and Herzegovina, Kosovo*, Moldova, and Serbia; in Albania and Montenegro were applied on & off-peak prices, while in North Macedonia seasonal and on & off-peak prices were used.

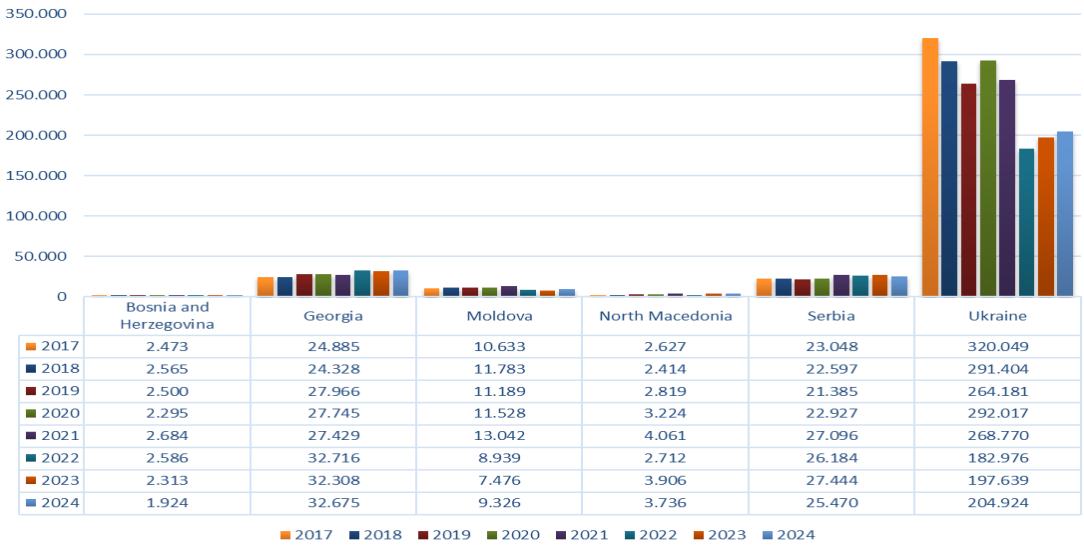
FINDINGS: GAS

This part of the report provides analysis of the retail gas markets in Bosnia and Herzegovina,[29] Georgia, Moldova, North Macedonia, Serbia and Ukraine. Having in mind that Albania, Kosovo* and Montenegro do not have gas markets, this part of the report does not include information for these Contracting Parties.

1. Gas retail market characteristics

After the substantial drop in 2022, the gas demand in Contracting Parties started recovering following different dynamics. To the minor decrease of average gas consumption of less than 0.5% from 2023 to 2024 contributed the increases in Georgia, Moldova and Ukraine and decreases in Bosnia and Herzegovina, North Macedonia and Serbia. The highest year-to-year increase of almost 25% was registered in Moldova and the biggest decrease in Bosnia and Herzegovina- close to 17%. In comparison to the period before the energy crisis and the war in Ukraine- from 2020 to 2024, the gas demand dropped by 30% in Ukraine, 20% in Moldova and 16% in Bosnia and Herzegovina, while increasing by more than 10% in Georgia, North Macedonia and Serbia. These increases are explained by the existence of long-term wholesale supply contracts in Georgia and Serbia, and continuous gasification process in Georgia and North Macedonia. The figures below present the total gas sales to final customers in the period from 2017 to 2024 as well as consumption growth rates for the whole period and in the last year. Having in mind the size of the Ukraine gas market compared to other Contracting Parties, the results are displayed separately with and without data for Ukraine.

Figure 2 *Total sale of gas to final customers in the Energy Community Contracting Parties in the period 2017 – 2024 (in GWh)*[30]

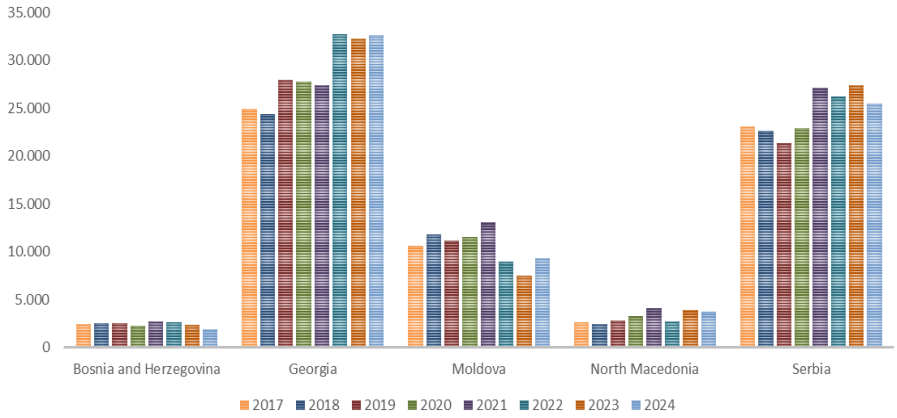


	Bosnia and Herzegovina	Georgia	Moldova	North Macedonia	Serbia	Ukraine
2017	2.473	24.885	10.633	2.627	23.048	320.049
2018	2.565	24.328	11.783	2.414	22.597	291.404
2019	2.500	27.966	11.189	2.819	21.385	264.181
2020	2.295	27.745	11.528	3.224	22.927	292.017
2021	2.684	27.429	13.042	4.061	27.096	268.770
2022	2.586	32.716	8.939	2.712	26.184	182.976
2023	2.313	32.308	7.476	3.906	27.444	197.639
2024	1.924	32.675	9.326	3.736	25.470	204.924

[29] The information for Bosnia and Herzegovina for gas was provided by the regulatory authority of Republika Srpska entity of Bosnia and Herzegovina. Only the information on gas demand refers to the whole Bosnia and Herzegovina.
[30] For Ukraine, the information for 2022 do not include data of four DSOs and for 2023 and 2024 data for three DSOs.

Source: National regulatory authorities

Figure 3 *Trends in sale of gas to final customers in GWh in the period 2017 – 2024 (excluding Ukraine)*

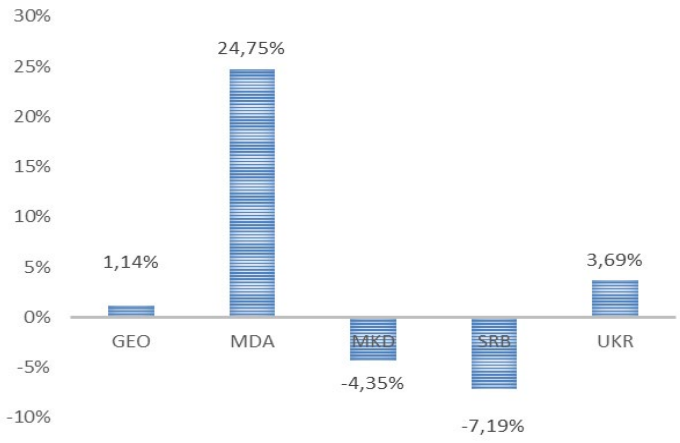


Source: National regulatory authorities

Figure 4 *Growth rates of gas demand 2020 to 2024*

Source: National regulatory authorities

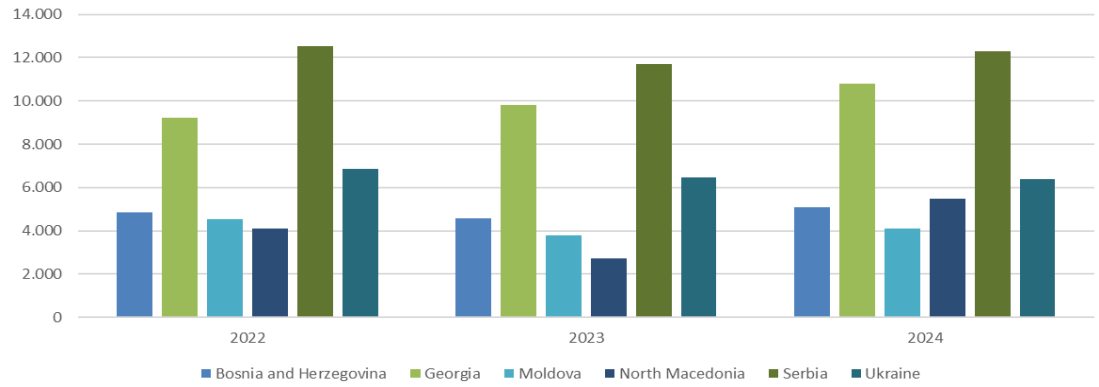
Figure 5 *Growth rates of gas demand 2023 to 2024*



Source: *National regulatory authorities*

The gas consumption of households in Georgia and Serbia is substantially higher than in other Contracting Parties. In most of the markets, average household demand decreased between 2020 and 2024, while it increased on year-to-year basis since 2023 in all of them except Ukraine.[31] A substantial decrease in average household consumption between 2020 and 2024 was registered in North Macedonia (38%) and Moldova (19%), the Contracting Parties with the highest final gas prices, while in other Contracting Parties the average household consumption dropped as well, but to a lesser extent. Relevant quantities are displayed in the figure below.

Figure 6 *Average annual gas consumption per household in 2022 – 2024 (in kWh)*[32]



The number of active suppliers ranged from two in Bosnia and Herzegovina to 199 in Ukraine. Moldova continued to register an increase of retail market suppliers – from five in 2022 to 15 in 2024. In Ukraine, the number of active suppliers dropped in the period 2023 – 2024 from 212 to 199, while in other Contracting Parties the numbers of active suppliers remained stable. The majority of active retail suppliers holds a license for supplying customers nationwide, i.e. those suppliers that are entitled to supply not only in a specified geographical region but on the entire territory of the country. Nevertheless, the household customers in the Contracting Parties predominantly buy gas from local incumbent suppliers.

In four Contracting Parties, namely Georgia, Moldova, Ukraine and Serbia customers connected to the distribution network are supplied by more than one supplier (i.e. other than the incumbent). On the other side, in all Contracting Parties customers connected to the transmission network could be supplied by more than one supplier. To generate positive market-opening effects, it is crucial to ensure the efficient unbundling of supply and network operations and to permit gas retailers to serve customers across the entire country.

[31] Having in mind that for Ukraine the set of data as of 2024 does not include three DSOs, it could be that households' gas demand also there increased.
[32] For Ukraine, the information for 2022 do not include data of four DSOs and for 2023 and 2024 for three DSOs.

Table 5 *Number of active gas suppliers in 2023 and 2024*

	Number of licensed gas suppliers		Number of active gas suppliers	
	2023	2024	2023	2024
Bosnia and Herzegovina	na	na	2	2
Georgia	No license for supply		28	29
Moldova	24	33	11	15
North Macedonia	28	28	6	8
Serbia	67	66	34	34
Ukraine	1039	1081	212	199

Source: *National regulatory authorities*

In order to accomplish the picture of retail gas markets from supply side, concentration of markets have been investigated. The results are presented in the table below. The following conclusions can be drawn:

- In all Contracting Parties, the aggregated market share of three largest retail suppliers was more than 80%. This market share increased from 69% in 2022 to 87% in 2024 in Ukraine, whereas in other Contracting Parties remained stable. The shares of the largest companies varied from 39% in Georgia, 45% in Ukraine and 52% in North Macedonia to 78% and 89% in Serbia and Moldova respectively. The great majority of active suppliers in all analysed markets cover less than 5% of total gas consumed by final customers.
- There was often no alternative to the incumbent gas supplier in the household segments of the analysed markets and in cases where there was an alternative available it was hardly used in 2024. The exception is Ukraine, where households change suppliers (see chapter below), but there is no track record on the share of incumbents in the household gas supply. Traditional obstacles to retail market entries in other Contracting Parties, such as a single source of gas and poor access to liquid wholesale markets stepwise lose their relevance and give way to removing remaining issues related to retail market design, the most important being the regulation of end-user prices.

Table 6 *Retail gas market concentration in 2024*

	Number of gas retailers selling at least 5% of total gas consumed by final customers	Market share of the 3 largest companies in the retail market (aggregated) in %	Estimated incumbent market share in the household market, in % of annual consumption
Bosnia and Herzegovina	2	100%	100%
Georgia	3	85%	100%
Moldova	1	95%	100%
North Macedonia	4	92%	100%
Serbia	1	86%	100%
Ukraine	2	87%	n.a.

2. Switching behaviour

All natural gas customers in the analysed Contracting Parties were eligible to choose their supplier. Only in Ukraine and Moldova, household customers changed their suppliers in 2024, more precisely 30 households in Moldova and 12,795 in Ukraine.

For non-households, the following information on switching rates has been provided for other Contracting Parties:

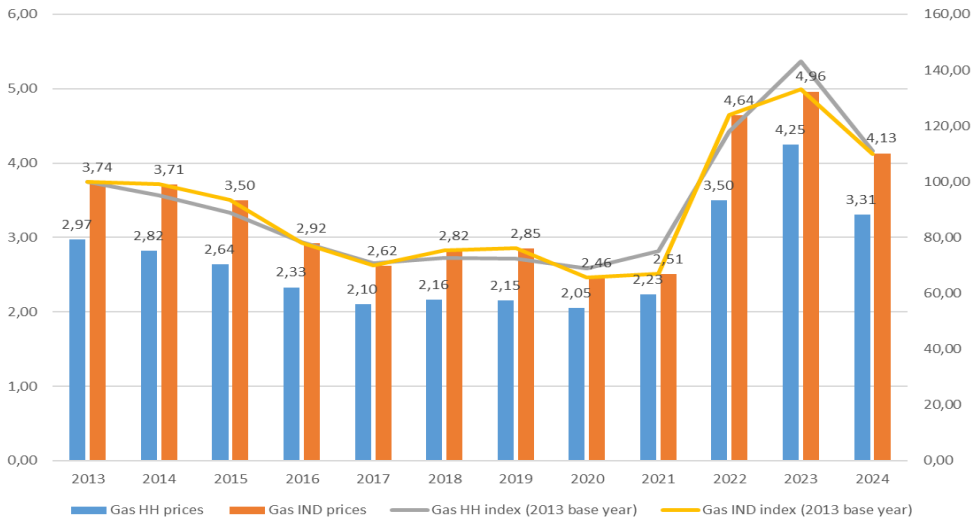
- In Bosnia and Herzegovina and Georgia, none of the non-households changed supplier in 2024;
- In North Macedonia, 10 non-household customers, holding 2.85% of total national consumption, changed suppliers in 2024.
- In Serbia, 52 non-household customers, accounting to 0.92% of total consumption, changed suppliers in 2024.
- In Moldova, 87 non-households changed their supplier.
- In Ukraine, 6.56% of non-households and 0.11% of households, measured in number of metering points, switched supplier. This reflects 4.05% of the total gas consumption in the country.

3. End-user natural gas prices

In 2024, both weighted average household and industry prices in the Contracting Parties (without Ukraine) decreased on a year-to-year basis, for the first time since 2021, for households by 22% reaching 3.31 euro cents/kWh, and for industry by 17% resulting in 4.13 euro cents/kWh. Over the period 2013-2024, the average gas prices for households increased by 11.45% and for industry by 10.43%. The average household price in the Contracting Parties was around 30% of

the average EU price for households in 2024. In the same year, the average price for industry was 1.2 euro cents/kWh lower than for the EU industry.

Figure 7 *Average final gas prices for households and industry in the EnC (without Ukraine)- 2013 – 2024 (euro cents/kWh)*

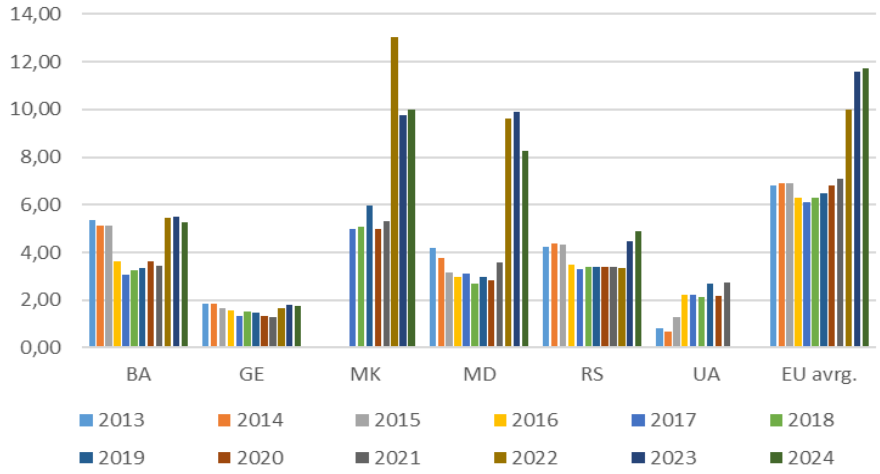


Source: Eurostat, Band D2: 20 – 200 GJ (household gas consumption), Band I5: 1,000,000 – 4,000,000 GJ, for Bosnia and Herzegovina, Ukraine and Serbia i.e. Band I4: 100,000 – 1,000,000 GJ, for Georgia, Moldova and North Macedonia (industrial gas consumption), October 2025

Across the Contracting Parties, substantial national discrepancies in the level of household and industrial gas prices are observed. The final prices paid by household gas consumers in 2024 in North Macedonia and Moldova (10.05 i.e. 8.28 euro cents/kWh) were around 5 times higher than 1.79 euro cents/kWh paid by Georgian households. In the industrial segment, the price paid by consumers in Georgia (2.58 euro cents/kWh) was more than two times lower than the industry price paid in Bosnia and Herzegovina (6.16 euro cents/kWh). Very low gas prices in Georgia are explained by the existence of long-term wholesale supply contracts and Government subsidies.

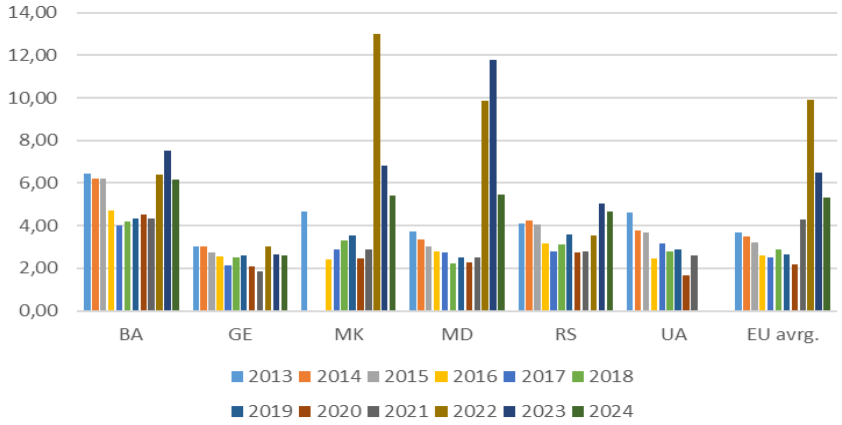
The biggest decreases between 2023 and 2024 in both consumer segments were registered in Moldova – 16% for households and 54% for industry. For the households, prices increased in North Macedonia and Serbia, by 2.67% i.e. 9.38%. The average industrial prices decreased in all Contracting Parties.

Figure 8 *Final gas prices in nominal terms for household consumers in EnC CPs – 2013 – 2024 (euro cents/kWh)*[33]



Source: Eurostat, Band D2: 20–200 GJ (household gas consumption), October 2025

Figure 9 *Final gas prices in nominal terms for industrial consumers in EnC CPs – 2013 – 2023 (euro cents/kWh)*[34]



Source: Eurostat, Band I5: 1,000,000–4,000,000 GJ, for Bosnia and Herzegovina, Ukraine and Serbia i.e. Band I4: 100 000 GJ -1 000 000 GJ, for Georgia, Moldova and North Macedonia, (industrial gas consumption), October 2025

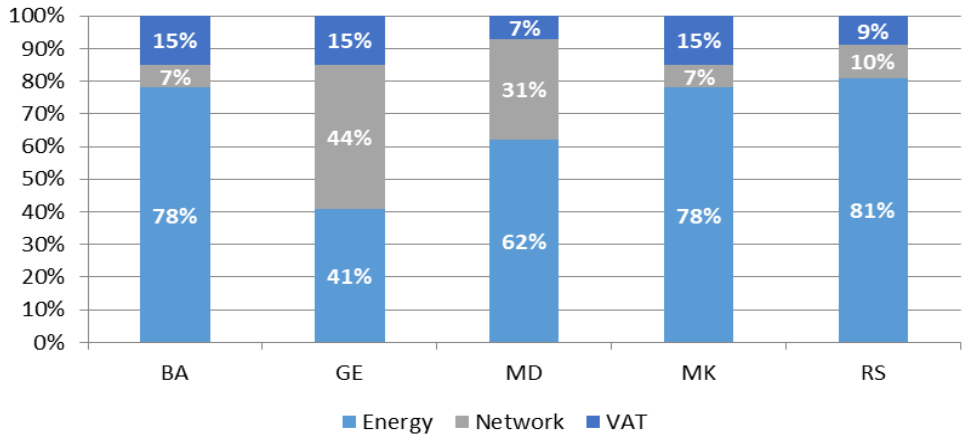
4. Gas price breakdown for households

The figure below shows the breakdown of gas prices for households in the Contracting Parties, for which the information was available.[35] The share of energy component in the final gas price in 2024 ranged from 41% in Georgia to 81% in Serbia. The share of network charges, including

[33] EUROSTAT data for Ukraine since 2022 not available.
[34] EUROSTAT data for Ukraine since 2022 not available.
[35] For Ukraine, information for 2024 is not available.

both distribution and transmission network costs, ranged from 7% in Bosnia and Herzegovina and North Macedonia to 44% in Georgia. In comparison to 2023, the change of energy/network shares occurred only in Moldova, where the price of energy dropped substantially, consequently increasing the share of energy cost in the final price for households. The average shares of energy component in the final household prices were mostly higher in the Contracting Parties than in the EU (usual difference of around 20 percentage points), whereas the network cost shares were lower.

Figure 10 *Breakdown of household gas prices in the EnC CPs – 2024 (in %)*



Source: *ECS calculations based on Eurostat, Band D2, October 2025*

5. End-user gas price regulation

End-user gas prices for **household customers** were regulated in all Contracting Parties in 2024[36] except in North Macedonia. In Ukraine, the Law No 2479 was adopted, establishing a moratorium on natural gas price increases for all households compared to the prices applied in relations between suppliers and relevant consumers as of 24 February 2022. The moratorium was established for the period of martial law and 6 months after its abolition.

Application of price regulation for **industry** differs among Contracting Parties:

- In Bosnia and Herzegovina, North Macedonia, Georgia and Ukraine, end-user prices for industry are not regulated. However, in Ukraine, as of 2022, public service obligations to supply natural gas for heating companies, budgetary institutions and for thermal power plants, combined heat and power plants, gas turbine and gas piston plants at predefined prices were imposed again on some gas market participants. The share of non-households supplied at regulated prices, measured in volume, reached 65%.
- In Serbia, small and medium enterprises with a yearly consumption up to 100,000 m^3 and connected to the distribution system may buy gas at regulated prices.

[36] It is worth noting that all customers, including households, are eligible to change their suppliers. However, in all Contracting Parties protected customer categories (households, small industry and/or district heating) have the right to be supplier at regulated prices.

- In Moldova, non-households are supplied both at regulated and non-regulated prices, depending on a supplier. The so-called non-regulated suppliers became active suppliers for the first time in 2020. Still, 99% of non-households were supplied at regulated prices in 2024.

In the process of phasing out end-user price regulation it is important to prove to customers that the gas price is a market-based commodity price that varies according to the wholesale market developments. One of the most efficient tools for doing so is frequent updating of the regulated energy component, so to allow the final price to reflect changes in the wholesale market. This will also offer customers the possibility to estimate if retail companies, other than incumbent suppliers, provide cheaper energy.

CONSUMER PROTECTION AND EMPOWERMENT

This chapter reviews the level of consumer protection and empowerment in electricity and gas markets of Energy Community Contracting Parties.

The topics covered in this chapter are:

- Supplier of last resort and disconnections;
- Vulnerable customers;
- Billing and price comparison tools;
- Smart metering systems;
- Offers;
- Active consumers and
- Complaint handling and dispute resolution.

1. Supplier of last resort and disconnections

To ensure the right to universal service according to Article 27 of Electricity Directive, Contracting Parties may appoint a supplier of last resort (SOLR) and impose on DSOs an obligation to connect consumers under terms, conditions and tariffs set in accordance with the procedure laid down in Article 59(7). Directive 2009/73 also calls for a SOLR for consumers connected to the gas system.

The Energy Community acquis does not further define the meaning and functions of a SOLR, but in 2024 the relevant EU legislation was supplemented[37] with new provisions that explicitly lay down the general rules for the operation of the supplier-of-last-resort regime (new article 27a of the EU Electricity Directive). National legislation and practice in European Union Member States and Energy Community Contracting Parties so far recognized such functions of SOLR as protection of inactive consumers, precaution for failure of supplier and protection of consumers with payment difficulties. The role of SOLR should be designed in a way to enable and promote consumer engagement in the liberalized market.

In all Contracting Parties, a SOLR is appointed for non-household consumers in both electricity and gas markets (provided that some of the Contracting Parties do not have organized gas market). In the household segment of these markets a SOLR is designated in the majority of Contracting Parties, but not in North Macedonia, Serbia and Federation of Bosnia and Herzegovina (as BIH entity) where a public i.e. universal supplier fulfils the role SOLR for them and not in Georgia (for natural gas market).

[37] Directive (EU) 2024/1711 of the European Parliament and of the Council of 13 June 2024 amending Directives (EU) 2018/2001 and (EU) 2019/944 as regards improving the Union's electricity market design.

The SOLR are appointed by the Governments (or by NRA in Albania and Moldova) following a public tender procedure.[38] In the majority of cases, the price at which SOLR supplies customers is higher than the average market price for households.[39] In Montenegro, the price of electricity for the SOLR may not be higher than the price procured on the market under the most favourable conditions, with allowed increase or difference in price of maximum 10% per unit of delivered energy. In Ukraine for gas this price is the same. The higher price of the SOLR incentivizes consumers to actively look for a supplier on the market. If this incentive is lacking, another mechanism should be in place.

In all Contracting Parties, customers are allowed to stay with the SOLR for a limited period of time, mostly three (Federation of Bosnia and Herzegovina and Brčko District (as BIH entity/part), Montenegro, Moldova, Ukraine for electricity, Georgia and North Macedonia for electricity and gas) or two months (Albania, Kosovo* and Ukraine for gas, Serbia both for electricity and gas, Republika Srpska (as BIH entity) for both electricity and gas). But electricity customer In Albania may remain in the SOLR regime for two years and in Moldova gas customer may remain in the SOLR regime for 4 months.

In addition to the basic right to electricity and gas supply, household customers should be timely and properly informed about the upcoming disconnection in case they did not pay the electricity or gas bill. Article 10 of Electricity Directive obliges suppliers to provide household customers with adequate information on alternative measures to disconnection sufficiently in advance of any planned disconnection.

The overview of the notice periods for disconnection of consumer from the network in the Contracting Parties is shown in the table below.

Table 7 *Minimum duration of disconnection process for non-paying consumers across the Contracting Parties in 2024*[40]

How many working days in advance must final household consumers be given a final warning about imminent disconnection in case of non-payment by law	ELECTRICITY	GAS
Albania	60	NA
Bosnia and Herzegovina	8	RS: after 2 non-paid bills
Georgia	NA	NA
Kosovo*	15	NA
Moldova	10	10
Montenegro	8	NA
North Macedonia	30	30
Serbia	8	8

[38] There is no tendering procedure in Albania and Moldova for electricity.
[39] For North Macedonia the issue is not applicable, for Bosnia and Herzegovina only the information for Federation of BIH has been provided.
[40] Hereinafter the following abbreviations apply: NA - not available.

Ukraine[41]	10	not less than 3 days

In all Contracting Parties except Moldova and for electricity – Republika Srpska (as BIH entity), suppliers inform customers on the alternative measures to disconnection. This is mostly an alternative payment plan.

The number and share of household disconnections due to non-payment for electricity in the Contracting Parties presented in the table below.

Table 8 *The number and share of household disconnections due to non-payment for electricity across the Contracting Parties in 2024*

Contracting Party	Number of household disconnections	Share of household disconnections, in % of household metering points
Albania	74,017	5.5%
Bosnia and Herzegovina	22,969	1.59%
Georgia	NA	NA
Kosovo*	299,805	3.87%
Moldova	NA	NA
Montenegro	12,699	3.17%
North Macedonia	98,272	10.63%
Serbia	8,584[42]	0.2%
Ukraine	171,590	1.03%

2. Vulnerable customers

Energy services and the well-being of the citizens are inseparable and cannot be considered differently. Therefore, providing adequate warming, cooling, lighting and energy to power appliances are essential services in order to ensure a decent standard of living. Both Electricity and Gas Directive require that Contacting Parties define the concept of vulnerable customers and take appropriate measures to protect them. Furthermore, the Contracting Parties shall establish the set of criteria to be used when assessing the number of households in energy poverty pursuant to the Governance Regulation[43]

The results of the survey show that all Contracting Parties have introduced **definitions of the concept of vulnerable consumers**, but only a few of them (Serbia, Moldova for both electricity and gas and BIH entity Republika Srpska for gas) defined "energy poverty" in national legislation.

[41] During the validity of the martial law disconnections are not allowed for households located within territories in which hostilities are conducted, data in the table refer to regular circumstances.
[42] Number of metering points
[43] https://www.energy-community.org/dam/jcr:e24c911e-f0f6-4f26-a152-ec79d85ee1a4/EnC%20REGULATION%20(EU)%2020181999.pdf

The following table shows measures used for protection of vulnerable customers in the Contracting Parties in 2024.

Table 9 *Measures to protect vulnerable customers in the Contracting Parties in 2024*

Measures to protect vulnerable customers	Number of CPs – electricity	Number of CPs – gas
Restrictions on disconnection due to non-payment	8 (UA, SRB (only for medical), ME, GE, AL, MK, BIH (RS), KS)	5 (UA, SRB (only for medical), GE, MK, BIH (RS))
Earmarked social benefits to cover (unpaid) energy expenses	5 (UA, GE, MK, MD, KS)	2 (UA, MD)
Special energy prices for vulnerable customers	1 (AL)	0
Additional social benefits to cover (unpaid) energy expenses (non-earmarked financial means)	4 (GE, MK, BIH (BD), MD)	3 (GE, MK, MD)
Free energy-saving advice to vulnerable customers	5 (UA, MK, BIH (BD), MD, KS)	2 (MK, MD)
Right to deferred payment	3 (UA, MK, BIH (BD))	3 (UA, MK, BIH (RS))
Exemption from some components of final customer energy costs (e.g. energy price, network tariffs, taxes, levies…)	1 (AL)	0
Financial grants for the replacement of inefficient appliances	3 (AL, MK, MD)	1 (MD)
Free basic supply of energy	1 (SRB)	1 (SRB)
Other[44]	3 (UA, ME, BIH (BD))	1 (UA)

The most common measures for protection of vulnerable customers in Contracting Parties are restrictions on disconnection due to non-payment and earmarked social benefits to cover (unpaid) energy expenses. Measures of protection are more used in electricity, but that is partly so because gas markets do not exist in all Contracting Parties.

The shares of vulnerable electricity customers out of the total number of households metering points in Contracting Parties at the end of the 2024, were the following:[45] Bosnia and Herzegovina 4.56%, Kosovo* 9.24%, Montenegro 6.69%, North Macedonia 0.17%, in Serbia 5.01%. In Moldova the share of vulnerable customers for both electricity and gas is the highest – 75%.

[44] In Montenegro depending on the category of vulnerable customers subventions are: 30 – 40% of the bill if it is up to 60 EUR, for bills of more than 60 EUR the subvention is fixed at 18 – 24 EUR; 50% of the bill if consumption is up to 600 kWh, and if consumption is above 600 kWh the subvention is 50% of the bill for 600 kWh consumption. In Federation of Bosnia and Herzegovina (as BIH entity) pensioner with the lowest pensions and beneficiaries of permanent social financial support are protected in a form of reducing electricity costs in such a way that monthly consumption is below 268 kWh if supplied by JP Elektroprivreda BIH d.d. Sarajevo, and bellow 348 kWh if supplied by JP Elektroprivreda HZHB d.d. Mostar. In Ukraine until the termination or abolition of martial law in Ukraine, it is prohibited to accrue and collect penalties (fines), inflation accruals, interest per annum, accrued on arrears formed for late and / or incomplete payment for utilities, termination / suspension of the provision of utilities in case of non-payment or incomplete payment to households located within territories in which hostilities are conducted or temporarily occupied by the Russian Federation (the resolution of the Cabinet of the Ministers of March 5, 2022 № 206)

[45] Information not available for all Contracting Parties.

3. Billing and price comparison tools

Making a customer an active participant in the market requires accurate billing information, i.e. the **information on energy bills** must be clear, accurate, concise, user-friendly and transparent. In addition to the requirements that billing information is free of charge and that various modalities for bill payment are available, the minimum requirements for bills are envisaged in Annex I of the Electricity Directive.

The table below provides information included in the customers' electricity bills in the Contracting Parties.

Table 10 *Elements of the electricity bills in the Contracting Parties*

Information on customer bills issued by supplier	ALB	BIH	GEO	KOS*	MDA	MNE	MKD	SRB	UKR
Price to pay	yes	yes	yes	yes	yes	yes	yes	yes	yes
The breakdown of price	no	yes	yes	yes	yes	yes	yes	yes	yes
Consumption for the billing period	yes	yes	yes	yes	yes	yes	yes	yes	yes
Due date of payment	yes	yes	yes	yes	yes	yes	yes	yes	yes
Information on the fuel company mix used (including environmental impact)	no	no	no	no	yes	no	no	no	yes
Information on the fuel product mix used (including environmental impact)	no	no	no	no	yes	no	no	no	no
Comparisons of the consumers' current electricity consumption with consumption for the same period in the previous year in graphic form	no	yes	yes (not in graphic form)	no	yes	yes	no	yes	yes
Contact information for consumer organizations, energy agencies, or similar bodies	no	no	yes	no	yes	no	no	yes	no
Website addresses, from which information may be obtained on available energy efficiency improvement measures, comparative end-user profiles, and objective technical specifications for energy-using equipment	no	no	no	no	yes	yes	no	no	no
Comparisons with an average normalized or benchmarked final consumer in the same user category	NA	no	yes	no	no	no	no	yes	no
Reminder about cancellation terms and/or dates	NA	no	yes	no	no	yes	yes	yes	no

Information on customer bills issued by supplier	ALB	BIH	GEO	KOS*	MDA	MNE	MKD	SRB	UKR
Whether consumption is based on actual reading or estimation	yes	yes	NA	yes	yes	no	no	yes	no
Contact details of the supplier, including a consumer support hotline and email	yes	yes	yes	yes	yes	yes	no	yes	yes
Tariff name	yes	yes	NA	yes	no	yes	no	yes	no
Duration of the contract/end date	no	no	no	no	no	no	no	yes (but not for in-definite-term con-tracts)	yes
Consumer's switching code or unique identification code for their supply point	yes	yes	yes	no	yes	yes	no	yes	no
Information on and benefits of switching supplier	NA	no	NA	no	no	no	no	no	yes
A link or reference to where comparison tools can be found	yes	no	NA	no	no	no	no	no	no
Information on their rights as regards the means of dispute settlement available to them in the event of a dispute	yes	yes	yes	yes	yes	no	no	no	no
Contact details of the dispute settlement body	NA	yes	yes	yes	yes	no	no	no	yes[46]

Some of the most important elements of the bills that are not included in the electricity bills in many Contracting Parties are the following:

- Duration of the contract/end date;
- The information on and benefits of switching;
- Link or reference to a price comparison tool (worth noting here is that price comparison tools are not available in the most Contracting Parties);
- Information on the fuel company and product mix used (including environmental impact);

[46] In Ukraine the electricity supplier is obliged to provide in the bill issued to the electricity consumer (or in its annexes) in the form and manner determined by the Regulator, information on addresses, telephone numbers, and websites for submitting applications, claims, and complaints, as well as for providing notifications of threats to the secure operation of the power system.

- Contact information for consumer organizations, energy agencies, or similar bodies as well as
- Comparisons with an average normalized or benchmarked final consumer in the same user category.

When it comes to the gas bill the most present information are:[47] current actual prices of gas, consumption for the billing period, the breakdown of price, due date of payment and the supplier's details.

The frequency of billing information based on actual consumption was monthly in all Contracting Parties during 2024. This is well beyond the requirement of the Electricity Directive to have billing based on actual consumption at least once a year.

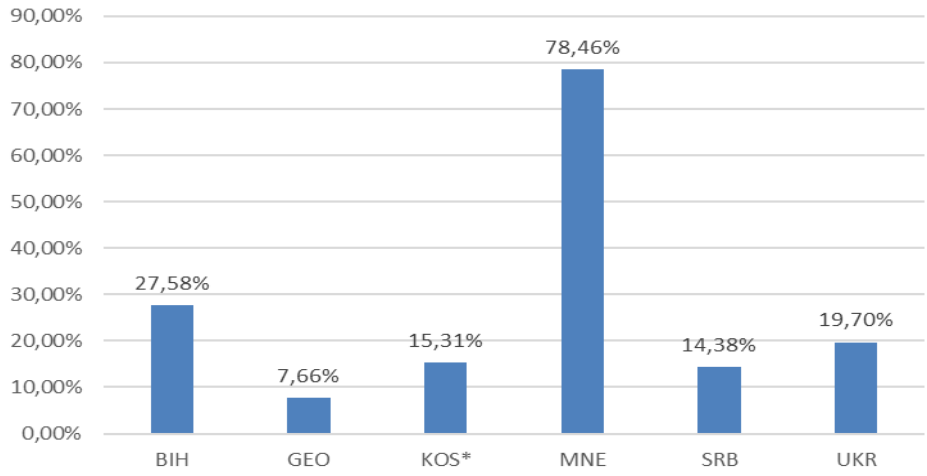
In the majority of the Contracting parties, consumers don't have access to a **comparison tool** or tool that meets the criteria of Article 14 of Electricity Directive. Still, price comparison tools for electricity market exist in Albania, Bosnia and Herzegovina (http://uporedistruju.ba) and North Macedonia (https://switch.mk/#/).

4. Smart metering systems

The Electricity Directive requires the implementation of **smart metering systems** that shall assist the active participation of consumers in the electricity supply market. The implementation of such smart metering systems may be subject to an economic assessment of all long-term costs and benefits to the market and the individual consumer. The assessment shall take into consideration the methodology for the cost-benefit analysis and the minimum functionalities for smart metering systems as per Commission Recommendation 2012/148/EU as well as the best available techniques for ensuring the highest level of cybersecurity and data protection. Where the deployment of smart metering systems is assessed positively, at least 80% of final consumers shall be equipped with smart metering systems either within seven years of the date of the positive assessment or by 2024 for those Contracting Parties that have initiated the systematic deployment of smart metering systems before the date of entry into force of Electricity Directive in the Energy Community. The cost-benefit analysis was performed only in Georgia (with positive results), Bosnia and Herzegovina – Republika Srpska entity (with negative results) [48] and Kosovo* (no information whether the results were positive or negative) [49]. Nevertheless, many Contracting Parties introduced smart meters, as shown for electricity in Figure 20 below[50]. Still, these smart meters do not meet in full the functionalities as outlined in the Electricity Directive (except Albania and Kosovo*, who explicitly stated that smart meters meet the functionalities as outlined in Article 20 of Directive 2019/944).

[47] The information is based on the answers of Bosnia and Herzegovina, Moldova, Serbia and Ukraine
[48] The cost-benefit analysis was done about ten years ago, a new one should be done.
[49] The cost-benefit analysis was done by the DSO, now it is under revision.
[50] For Montenegro - the share is calculated to the total number of consumers (households and non-households) equipped with smart meters; for Ukraine – without data from 2 DSOs.

Figure 20 *Share of households with smart meters in total number of households (in %) (status 31.12.2024.)*



Source: NRAs

Five Contracting Parties have provided information on the shortest timing interval for consumption data stored in smart meters and transmitted to the DSO/suppliers/responsible party available for final household consumers: Albania (15 min), Bosnia and Herzegovina (15 min), Georgia (1 hour), Kosovo* (15 min) and Ukraine (30 min).

In most of the Contracting Parties (Albania, Bosnia and Herzegovina, Georgia, Kosovo*, Serbia and Ukraine) the smart meters can account for the energy generated by household prosumers.

5. Offers

Electricity Directive defines basic contractual rights for customers and obliges Contracting Parties to ensure that all final customers are entitled to have their electricity provided by a supplier, subject to the supplier's agreement, regardless of the Party to the Energy Community in which the supplier is registered, provided that the supplier follows the applicable trading and balancing rules.

Specific attention is paid to dynamic electricity price contracts. Electricity Directive clearly states that Contracting Parties shall ensure that the national regulatory framework enables suppliers to offer dynamic electricity price contracts. Contracting Parties shall ensure that final customers who have a smart meter installed can request to conclude a dynamic electricity price contract with at least one supplier and with every supplier that has more than 200,000 final customers.

In 2024 none of the Contracting Parties has market based dynamic price contracts available to household as well as non-household customers. Detailed information on the products available to household and non-household consumers is presented in the table below.

Table 11 *Products available to household and non-household consumers in the Contracting Parties*

Products	ALB	BIH	GEO	KOS*	MDA	MNE	MKD	SRB	UKR
Household consumers									
Market based fixed price, fixed term contracts	-	yes	yes	-	yes	yes	no	yes	yes
Market based dynamic price contracts reflecting as defined in Directive 944	-	no	no	-	-	-	no	-	no
Market based variable, based on average monthly spot price	-	no	no	-	-	-	no	-	no
Regulated fixed price contracts	yes	yes	yes	yes	yes	-	yes	-	yes
Regulated variable contracts	-	no	no	-	-	-	no	-	yes
Non-household consumers									
Market based fixed price, fixed term contracts	-	yes	yes	-	yes	yes	yes	yes	yes
Market based dynamic price contracts reflecting as defined in Directive 944	-	no	no	-	-	-	no	-	no
Market based variable, based on average monthly spot price	-	no	no	yes	-	-	yes	yes	yes
Regulated fixed price contracts	-	yes	yes	-	yes	-	yes	-	yes
Regulated variable contracts	-	no	no	-	-	-	no	-	no

6. Active consumers

The concept of active customers, as prescribed by the Electricity Directive, is still not fully applied in the Contracting Parties. The concept of renewable self-generators, on the other side, is implemented in most of the Contracting Parties. This means that consumers are entitled to sell the electricity they produce and/or participate in net metering or billing schemes. However, active customers should be allowed to operate in the markets also through aggregation, to participate in flexibility and energy efficiency schemes. They should also be responsible for imbalances they cause in the electricity system. Enabling framework for active customers goes even beyond this and requires compliance with provisions related to smart metering, consumer information, switching, demand response, data management etc.

The table below provides the information on the number of households and non-households generating their own electricity, volumes of electricity being generated by households and non-households, capacity installed for renewables self-consumption in operation, in the Contracting Parties in 2024, where provided by the regulators.

Table 12 *Consumers generating electricity in the Contracting Parties in 2024 - number, capacities and volumes*

Contracting Party	Number of consumers generating their own electricity		Volume of electricity being generated by consumers (in MWh)		Capacity installed for renewables self-consumption in operation (in MW)
	Households	Non-households	Households	Non-households	
Albania	274	613	NA	NA	NA
Bosnia and Herzegovina	108	482	NA	NA	80
Georgia	907	794	3,780	60,415	144
Kosovo*	366	243	883	5,010	17
Moldova	4,691	1,649	39,219	67,698	151
Montenegro	4,480	354	44,195	8498	24
Serbia	3,039	1,228	17,085	15,015	83
Ukraine	63,099	451	1,710,852	19,711	1,931

Maximum level of installed capacity for renewables self-consumers or other category of active consumer (capacity limits) for households and non-households across Contracting Parties, where provided by NRAs, is presented in the table below.

Table 13 *Maximum level of installed capacity for renewables self-consumers or other category of active consumer (capacity limits) for households and non-households across Contracting Parties in 2024*

Contracting Party	Maximum level of installed capacity for renewables self-consumers or other category of active consumer (capacity limits) (in MW)	
	Households	Non-households
Albania	0.5	0.5
Bosnia and Herzegovina	For Republika Srpska: up to the level of the approved connection capacity	For Republika Srpska: In the way that the installed capacity of the power plant corresponds to consumption
Georgia	0.5	0.5

Contracting Party	Maximum level of installed capacity for renewables self-consumers or other category of active consumer (capacity limits) (in MW)	
	Households	Non-households
Kosovo*	0.007	Prosumers within support scheme: 0.015 – for prosumers connected to the low voltage distribution network (0.4kV) and not invoiced for the engaged active power; 0.1 – for prosumers connected to the low voltage of the distribution network (0.4kV), and are metered and invoiced for the engaged active power; 0,2 – for prosumers connected to the medium voltage distribution network (6kV, 10kV, 20kV and 35kV) and the transmission network. Prosumers out of support scheme: for prosumers connected to the low voltage distribution network (0.4kV), the allowed capacity is evaluated based on the lowest value of the consumed energy and based on the Electro-Energetic Consent; for prosumers connected to the medium voltage distribution network (6kV, 10kV, 20kV and 35kV) and the transmission network, the allowed capacity is evaluated based on the lowest value of the average engaged power during the 12-month period and based on the Electro-Energetic Consent.
Moldova	0.2	0.2
Montenegro	Up to the level of the approved connection capacity	Up to the level of the approved connection capacity
Serbia	0.0108	0.15
Ukraine	0.05 - for feed-in tariff scheme; 0.03- for net-billing scheme	0.15 - for feed-in tariff; 0.05 - for small non-households under net-billing scheme; 5 - for other non-households under net-billing scheme (20 MW - temporarily until 1 January 2028)

In the vast majority of Contracting Parties aggregation was not practiced in 2024, mostly due to the lack of relevant primary or secondary legislation. In Serbia consumer's right to aggregation is defined in primary legislation (Energy Law), but the implementation required adoption of relevant by-laws. In Brčko District part of Bosnia and Herzegovina consumers can purchase aggregation services in the market, but in Republika Srpska as BIH entity the relevant process of approving the Distribution Network Rules was underway. In Montenegro aggregation was not recognized by the old Energy law that was in force during the reporting period. Ukraine had the most advanced situation in this regard: due to legislation adopted in 2023, two aggregators were present in the market during the reporting period, while the volume of downward capacity awarded to aggregators in the balancing market was 0,37 MWh.

Also, none of the Contracting Parties reported about citizen energy communities being in place.

7. Complaint handling and dispute resolution

Both Electricity and Gas Directive require that final customers have access to simple, fair, transparent, independent, effective and efficient out-of-court dispute settlement mechanisms, through an independent mechanism such as an energy ombudsman or a consumer body or through a regulatory authority. Also, any party having a complaint against a transmission or distribution system operator in relation to that operator's obligations may refer the complaint to the regulatory authority which, acting as dispute settlement authority shall issue a relevant decision within defined period of time.

In all Contracting Parties, the national regulatory authority has the role of an Alternative Dispute Resolution (ADR) body. But several Contracting Parties have some specifics in this regard: in Serbia NRA performs the role of ADR body only for connection, access to system and supplier switching issues and may issue financial penalties for infringement of certain obligations in electricity sector but there are also other organizations in place like consumer protection organizations and courts; in Bosnia and Herzegovina only regulatory body of Republika Srpska entity has the role of ADR, but in Brcko District this role is performed by the Commission for Appeals under the Brcko District Government and in Federation of Bosnia and Herzegovina entity – by Consumer Protection Ombudsman or local/regional court; in Kosovo* the role of ADR body has also private mediator licensed by the Ministry of Justice.

Several regulators provided the information on the number of disputes settled during 2024: 287 in Albania, 1019 in Georgia, 2 in Moldova and approx. 520 in North Macedonia. The number of household complaints received by the NRAs, suppliers and DSOs are presented in the table below.

Table 14 *Number of household customer complaints for gas and electricity received by different institutions in 2024*

	Electricity				Gas			
	Suppliers	DSOs	ADR	NRA	Suppliers	DSOs	ADR	NRA
Albania	133,706	NA	143		NA	NA	NA	NA
Bosnia and Herzegovina	23,455	17,185	372 (RS)		NA	NA	NA	NA
North Macedonia	NA	7,155	520		382	NA	NA	
Georgia	NA	NA	868		NA	NA	622	
Kosovo*	11,596	398	NA	176	NA	NA	NA	NA
Moldova	NA	NA	810[51]		NA	NA	-	
Montenegro[52]	6,134	3,819	3		NA	NA	NA	NA
Serbia[53]	NA	NA	NA	331	NA	11,031	NA	10

[51] For both electricity and gas in total.
[52] Provided data refers to total number of complaints received from households and non-households.
[53] Provided data refers to total number of complaints received from all types of customers.

Ukraine	2,688	24,294	10,372	29,783	63,028	10,487

The majority of complaints included in the table above refer to bills. Other complaints received by the regulators are related to network connections and quality of supply.

The processing times set for suppliers, DSOs and NRAs to deal with complaints is shown in the table below.

Table 15 *The processing times set for suppliers, DSOs and NRAs to deal with complaints in 2024, in days*

	Electricity			Gas		
	Suppliers	DSOs	NRA	Suppliers	DSOs	NRA
Albania	30	30	45	30	30	45
Bosnia and Herzegovina	FBIH: 15 RS: 15 BD: 7	FBIH: 15 RS: 15 BD: 7	FBIH: 60 days from the day when the complaint was received, but may be extended for an additional 60 days if NRA needs to get more information RS: 60 (additional 30 in special cases) BD: 30	NA	NA	RS: 15
North Macedonia	NA	24	30 for complaints, 60 for disputes	for bills – 160 for quality of supply – 30 for connection – 58 other - 40	9	30 for complaints, 60 for disputes
Georgia	10 working days	10 working days	2 months after receiving the complete documents and information related to the issue, but may be extended by an additional 2 months if NRA needs additional time to search for information.	10 working days	10 working days	2 months after receiving the complete documents and information related to the issue, but may be extended by an additional 2 months if NRA needs additional time to search for information.
Kosovo*	for bills, quality of supply and connection 30	30	60 (but depends on the case)	NA	NA	NA

	Electricity			Gas		
	Suppliers	DSOs	NRA	Suppliers	DSOs	NRA
Moldova	for bills and other complaints (except quality of supply and connection) - 30	30	30	for bills and other complaints (except quality of supply and connection) - 30	30	30
Montenegro	for bills and other complaints (except quality of supply and connection) - 15	NA[54]	45	NA	NA	NA
Serbia	8 days for bills for households, and 15 days for billing complaint submitted by non-household customers	15 days for connection, 8 days in case operator has rejected request for access to system, 30 days for all others 15 days for billing complaint submitted directly by customer to DSO	60 days upon receival of customer appeal submitted for rejection of connection request, 8 days from customer submission of appeal against TSO/DSO rejection of access to system, 30 days for others	8 days for bills	15 days for connection, 8 days in case operator has rejected request for access to system 30 days for others	60 days for connection, 8 days from customer submission of appeal against TSO/DSO rejection of access to system, 30 days for others
Ukraine[55]	30-45 days	30-45 days	30-45 days	30-45 days	30-45 days	30-45 days

[54] The complaints towards DSOs are taken over by supplier, and then the processing time for suppliers is being applied.
[55] 30 days from the day when the complaint was received but may be extended for an additional 15 days if it is impossible to resolve the issue withing 30 days.

MAIN FINDINGS AND CONCLUSIONS

1. Electricity

After the substantial drop in the period 2021 – 2023 caused by the war in Ukraine and energy crisis, **electricity demand** in the Contracting Parties **increased** in 2024, on average by 1.71%. The highest increase was registered in Georgia – 7.72% and the lowest in North Macedonia – 1%.

End-user electricity prices decreased on average (without Ukraine) by 2% for households and 9% for industry. For the fourth year in a row, average industry prices were higher than those of households pointing out to the **existence of cross-subsidization** between these customer segments. The prices in the Contracting Parties are still well below the average prices on the EU level.

Except in Montenegro, Contracting Parties' households and small non-household customers were supplied at regulated prices in 2024. In several Contracting Parties, namely Albania, Georgia, Kosovo* and Moldova, also other non-households were buying electricity at regulated prices. **While price regulation may be justified in times of crisis, its persistence does not enable consumers to reap the benefits of market opening nor to actively participate in the energy sector transformation.** So, switching rates in the Contracting Parties were still mostly very low, and in the household segment, only a small number of consumers in North Macedonia and Serbia changed supplier in 2024.

In the majority of the Contracting Parties, **retail electricity markets are still highly concentrated**, with an aggregated market share of the three largest companies of more than 95% in six of them. The lowest share of three largest companies were registered in Ukraine – 25%. Nevertheless, households were still supplied only by incumbent suppliers in all Contracting Parties.

2. Gas

After the substantial drop in 2022, the gas demand in Contracting Parties started recovering following different dynamics. To the **minor decrease of average gas consumption** of less than 0.5% from 2023 to 2024 contributed the increases in Georgia, Moldova and Ukraine and decreases in Bosnia and Herzegovina, North Macedonia and Serbia. The highest year-to-year increase of almost 25% was registered in Moldova and the biggest decrease in Bosnia and Herzegovina – close to 17%.

In 2024, both weighted **average household and industry prices** in the Contracting Parties (without Ukraine) **decreased on a year-to-year basis**, for the first time since 2021, for households by 22%, and for industry by 17%. The average household price in the Contracting Parties was around 30% of the average EU price for households in 2024. In the same year, the average price for industry was 1.2 euro cents/kWh lower than for the EU industry. As for the electricity prices, average gas industry prices were higher than those of households, pointing out to the existence of **cross-subsidization** between these customer segments.

In 2024, only in Moldova and Ukraine, some household customers changed their supplier. In the non-household segment, some customers changed their suppliers in Moldova, North Macedonia, Serbia and Ukraine. The switching rates were the highest in Ukraine. Household and other protected customer categories in the Contracting Parties were offered the regulated end-user gas prices in 2024. However this was not the case in North Macedonia and Ukraine.[56]

In all Contracting Parties, the aggregated share of 3 biggest retail suppliers was more than 85%. The market share of the three largest companies in the retail gas market increased in Ukraine, whereas in other Contracting Parties remained stable. The great majority of active suppliers in all analysed markets covers less than 5% of total gas consumed by final customers. Still, all households were supplied by their incumbent supplier (data not available for Ukraine).

3. Customer protection and empowerment

The level of consumer protection in the Contracting Parties has been generally high for many years. Both households and commercial consumers are entitled to electricity and gas supplies through suppliers of last resorts i.e. public suppliers. The role of these suppliers needs to be designed to enable and promote consumer engagement in the liberalized markets, for example through the adequate price or the timespan during which consumers can be supplied under special conditions. In addition to the basic right to electricity and gas supply, household customers should be timely and properly informed about the upcoming disconnection in case they did not pay the electricity or gas bill. The regulators should monitor the disconnection rates in a systematic way.

Vulnerable customers are defined and protected through short-term measures, such as restriction on disconnection or earmarked social benefits to pay energy bills, in all Contracting Parties.

Making a customer an active participant in the market requires accurate billing information, i.e. the information on energy bills must be clear, accurate, concise, user-friendly and transparent. Some important elements of the bills are not included in the electricity bills in many Contracting Parties, such as the information on and benefits of switching, price comparison tools or the fuel company and product mix used. The frequency of billing information based on actual consumption was monthly in all Contracting Parties during 2024. This is well beyond the requirement of the Electricity Directive to have billing based on actual consumption at least once a year.

In the majority of the Contracting Parties, consumers still don't have access to a price comparison tool.

Smart metering systems are another tool enabling active participation of consumers in the energy market. Many Contracting Parties introduced smart meters, however these meters

[56] N.B. there is a moratorium on natural gas increases established in Ukraine for the period of martial law and six months after its abolition.

(except few Contracting Parties) do not meet in full the functionalities as required by the Electricity Directive.

Electricity Directive pays specific attention to **dynamic electricity price contracts** by clearly stating that Contracting Parties shall ensure that the national regulatory framework enables suppliers to offer such type of contracts to their customers. But in 2024 none of the Contracting Parties has market based dynamic price contracts available to household as well as non-household customers.

The concept of **active customers**, as prescribed by the Electricity Directive, is still not fully applied in the Contracting Parties. The concept of renewable self-generators, on the other side, is implemented in most of the Contracting Parties. However, active customers should be allowed also to operate in the markets also through aggregation, to participate in flexibility and energy efficiency schemes. In the vast majority of Contracting Parties aggregation was not practiced in 2024, mostly due to the lack of relevant primary or secondary legislation. It should be noted that enabling framework for active customers goes even beyond this and requires compliance with provisions related to smart metering, consumer information, switching, demand response, data management etc.

Final customers should have access to simple, fair, transparent, independent, effective and efficient out-of-court **dispute settlement mechanisms**, through an independent mechanism such as an energy ombudsman or a consumer body or through a regulatory authority. In all Contracting Parties, **the national regulatory authority has the role of an alternative dispute resolution body** with some countries' specifics related to the existence of other organizations involved in dispute settlement like consumer protection organizations, ombudsman, private mediators and courts. The majority of consumer complaints refer to bills, the other complaints received by the regulators were related to network connections and quality of supply.