

SEEGAS Meeting

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NOMAGAS JSC Skopje

Topic: NCs Development

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Presentation Content

- **NOMAGAS Overview**
 - Key info
 - NOMAGAS physical network
 - **Development of NCs**
 - Intro (National and EU Requirements)
 - Status, key issues (Network Rules, CAM NC, BAL NC)
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NOMAGAS Overview – Key Info

- **Country EU membership candidate since 2004**
- **Founding Party to the Energy Community.**
- **“NOMAGAS AD Skopje” established 2023 after merger of GA-MA (P/P) and MER (Public). State 100% shareholder.**
- **ENTSOG Observer status.**
- **Owns and operates the network.**
- **Gas Market Operator yet to be established.**
- **NOMAGAS assumed partial Gas MO responsibilities for the interim.**
- **Fiscal measurement – all continuous**



NOMAGAS Overview - Network

Currently “sideways horseshoe” shape
with a single IP (BG).

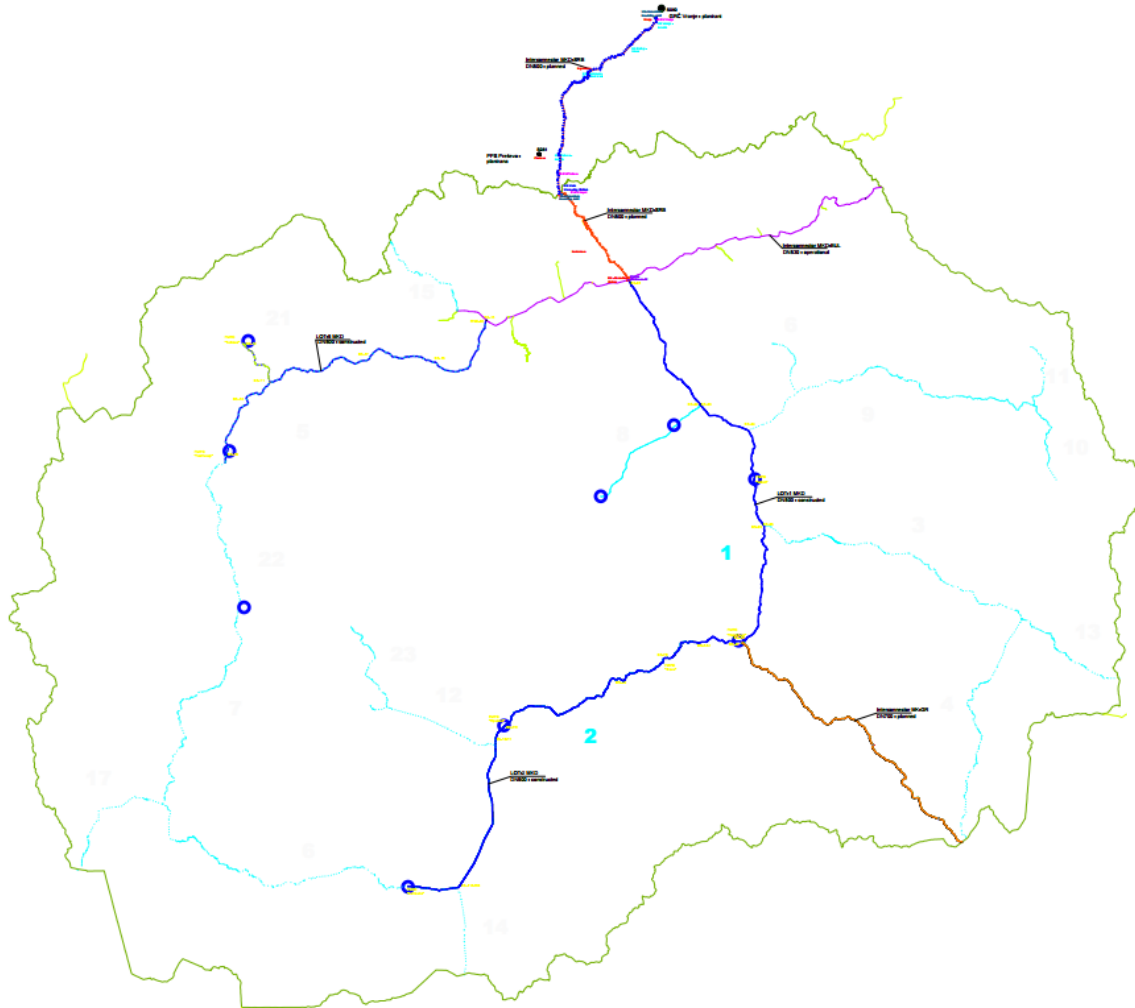
Existing and Future Pipelines:

-  Interconnector MK-BG (operational)
-  Interconnector MK-SRB (tender)
-  Built 2010-2024 (in service 2026/27)
-  Interconnector MK-GR (in construction)
-  Future expansion (closing the ring etc)

- All main sections DN500, except MK-GR DN700
- Annual consumption ~400 million Nm³ ie. 13 mln kWh/d average, but with heavy seasonal bias.

Max daily ~20 mln kWh/d =>

=> high utilisation at relatively low P of ~38-40 barg



NOMAGAS Network

**MK-SRB IP bidirectional
(tender):**
DN500, Pd=54 barg,
100% H2 ready.
In service 2028/29
**MK-KS
(future)**

**Closing Ring
(future):**
DN500, Pd=54 barg

**MK-AL
(future)**

MK-BG IP (sole operational asset),
DN500, Pd=54barg, Pmin=36barg,
Po~40barg;
~32 mln kWh/d
Existing “sideways horseshoe” network (online
2026/27):
DN500, Pd=54 barg. **NG only.**
Filling 2026/27. Significant connection interest

MK-BG (future)

MK-GR IP (under construction):
DN700, Pd~67 barg,
100% H2 ready.
In service 2027/28.
Potential transit.

Simple System !
**Extension of BG
Network**
No linepack control.
No remote control.

Complete network.
>3 IPs + spurs.
Operational control.

**Lots of hard work
ahead!!**

Tariff Framework

- **Revenue Cap model**
- **Tariff comprised of 3 components**
 - Capacity - Entry
 - Capacity - Exit
 - Transmission (Quantity/Commodity)
- **Currently 100% commodity.**
- **Transition from commodity to capacity over 5 year period following introduction of CAM NC (2027)**
- **Capacity will be 75% of the tariff at the end of 5 years, entry-exit split 50:50.**

Component	Current % of tariff	Future % of Tariff
Capacity - Entry	0%	½ of 75%
Capacity – Exit	0%	½ of 75%
Quantity	100%	25%

Development of NCs – National and EU Requirements

- **According to the Energy Law the following individual documents shall be prepared by the TSO and approved by the NRA**
 - Network Rules
 - Capacity Allocation Rules
 - Balancing Rules
 - Gas Transmission Agreement
 - Other accompanying documents
- **As a Contracting Party to the EnC Treaty, required to align national legislation with and implement relevant parts of the EU energy acquis, as transposed into the EnC acquis.**
 - Capacity Allocation Rules and Balancing Rules are being prepared in full harmonisation with CAM NC and BAL NC.
 - Market Operator rules currently being updated by NRA/NOMAGAS. Considering circumstances (low consumption, small number of shippers and so on), establishment of a market operator would be counterproductive at this stage (increase costs, decrease liquidity).

Network Rules

- **Status**

- Draft submitted to the NRA
- Initial review completed, ongoing discussions
- Stakeholder consultation in the coming period

- **Highlights**

- Complete update of the 2022 network rules
 - In line with relevant EU regulations
 - Makes reference to separate balancing rules and capacity allocation rules documents
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Capacity Allocation Rules - CAM NC

- **Status**

- Finalising draft document, harmonised with CAM NC - to be submitted to the NRA in the coming period.

- **Key issues**

- Bundling – single point of supply at the moment (IP with BG) – existing interconnection agreement (IA) from 2022
 - Legacy contract on BG side until at least 2030 on most of the capacity
 - Small % left “free” for bundling, remaining will have to be unbundled capacity, individual trades on each side
 - Derogation (BG NRA)
 - BG NRA (EWRC) submitted a request to ACER for derogation from the application of network codes and guidelines pursuant to Article 70(3) of the Gas Regulation (5 February 2026)
 - BG NRA previously communicated with the MK NRA re derogation on CAM NC only (no mention of CMP GL)
 - ACER approved the derogation on both CAM NC and **CMP GL as requested by BG NRA**. Does not leave room for liberalising capacity, improving competition; and will continue to affect NU self-balancing abilities.
 - TSO Communication / Cooperation
 - Needs improvement
 - Communication re CAM NC with BG TSO yet to commence

Capacity Allocation Rules - CAM NC

- **Key issues (continued)**
 - Second IP (GR) coming online 2027/28 (unidirectional)
 - IA yet to be negotiated
 - Third IP (SRB) coming online in 24-30 months (potentially bi-directional)
 - Communications with SRB TSO to be improved
 - IA discussions yet to commence
 - Do not expect major issues, new infrastructure, no legacy contracts
 - Auction platform
 - Yet to be decided upon
 - RBP required by BG (and possibly SRB)
 - PRISMA required by DESFA
 - Auction Products
 - Type and frequency of standard products auctions yet to be discussed with BG side, priority at the moment.
 - With GR and SRB also very important but not as urgent.
- **Summary**
 - Need to have clear understanding on capacity available for bundling, auction products, platform on MK-BG interconnection in order to expedite deployment of CAM NC.

Balancing Rules - BAL NC

- **Status**

- Finalising draft document, harmonised with BAL NC - to be submitted to the NRA in the coming period..
- NU survey conducted by NOMAGAS in the period Feb-Apr 2026 (written and in person) in order to establish obstacles in self-balancing.

- **Key issues**

- NOMAGAS often dealing with large imbalances, perform commercial balancing by trading on BGH.
- BRP ability for self-balancing - ties in with CAM NC and opportunities/hurdles from that.
- Key relevant findings from the BRP survey
 - Lack of capacity booking on MK side (to be partially resolved soon by introducing CAM NC)
 - Most users are currently unable to re-nominate. Those that have contractual flexibility, may be turned down by their BG counterpart, depending on the situation.
 - BRP trading on neighbouring exchange – must establish office in neighbouring zone = >> cost impacts
 - BRPs insist capacity on BG side be freed up for bundling to increase competition and reduce costs (highly unlikely to occur considering the derogation approval)
 - Some BRPs adamant within-day auctions will be needed (yet to be explored with BG side, unlikely to be acceptable)
- Backhauling may be an option at MK-BG, but it is yet to be explored in terms of possibility, legal or commercial obstacles, effectiveness.

Balancing Concept (based on BAL NC)

Primary Balancing

Self Balancing NUs (BRPs)

Pre-requisites:

- Adequate information to NUs
- Liquid wholesale market
- Trading platform

Potential Tools:

- Trade on BGH – NUs need to establish local presence in BG
- Gas transfer between BRPs (Art 5)
- Interim measure – BAL platform (Art 47) (website based) (**Note 1**)
- Nominations/renominations of quantities (Art 12) (**Note 2**)
- Over-nomination? (CAM, Art 32, within day, interruptible only)
- Imbalance charges (Art 19-23)

NU: Network User

BRP: Balancing Responsible Party (portfolio)

BGH: Balkan Gas Hub

Note 1: expecting small effects due to illiquid market and small number of large NUs

Note 2: Re-nominations may not be possible to satisfactory extent. IP congestion (legacy capacity contract)

Residual Balancing

Operational Balancing (TSO)

Pre-requisites:

- Liquid wholesale market in own balancing zone
- Alternative – trading platform in adjacent balancing zone

Possible Tools:

- Trade STSP on trading platform or use of balancing services (Art 6(3)).
- NOMAGAS cannot comply with Art 10 (Trading Platform), hence ==>
- NRA approves trading in an adjacent balancing zone (Art 9(3)) – currently only BGH available (GR in future)
- BRP justification for imbalance outside pre-set limits. Multiple occurrences without justification may be grounds for limit of nominations or license revocation.
- Within-day obligations (Art 24-28) (**Note 3**)
 - System WD obligations
 - Balancing portfolio WDO
 - Entry-exit point WDO
 - Approved by NRA
- Interim measures - illiquid market (Chapter X)
 - Balancing platform NOMAGAS (**Note 4**)
 - Balancing services - last resort (Art 9 (1)(c), Art 48)
 - Linepack flexibility service (Art 43) (**Note 5**)

Note 3: May be introduced at a later stage.

Note 4: Website anonymous title transfer in lieu of Balancing Platform (see left)

Note 5: No control over the linepack by NOMAGAS currently. Future option, 3-yr window).

Balancing Rules - BAL NC

- **Potentially Available Balancing Tools**

- Renominations, where feasible
- NUs trade on neighbouring exchange (BGH)
- Transfer between NUs
- NOMAGAS trading on BG and later GK exchange
- Active dispatching measures

- **Daily imbalance charges**

- Quantities and prices in accordance with BAL NC (Art 21 and Art 22)
- Daily imbalance charges in accordance with BAL NC (Art 20)

- **Neutrality**

- Significant focus to come up with a suitable approach for neutrality.
- Reviewed several methodologies (Germany, Netherlands, Bulgaria, Greece, Slovakia, Poland etc)
- 3 methods prevail in EU: quantities (most countries), imbalances and hybrid (quantities and imbalances)
- Quantity method – many countries, suitable for more mature and liquid markets, particularly where balancing-related costs are structural regardless of individual shipper behaviour. Costs are spread across transported/allocated/measured etc. volumes (depending on country).
- Based on the system specifics NOMAGAS proposing to use imbalances: proportional allocation of balancing-related costs to BRPs according individual BRP imbalances.

- **Summary**

- Key issue at the moment = > provide NUs with **feasible** tools for self-balancing without causing significant cost impact. Success largely dependent on existing IP capacity liberalisation and availability of flexible contracts on other side of the IP without significant cost impacts.
- Less concern in a 2-3 year window due to access to other markets

BAL NC and CAM NC – Final Remarks

- **In conclusion**

- CAM NC affects BAL NC
- CAM implementation Q4 2026 into 2027
- Capacity bundling will be unsatisfactory on the existing IP with BG. Mostly unbundled capacity.
- Self-balancing = > under current circumstances NUs may not be objectively able to always self-balance and NOMAGAS may have to continue to trade significant imbalances on their behalf.
- Availability of flexible contracts on the BG side and associated costs impacts are subject to further analysis.
- BRP ability to trade on BG exchange and associated costs impacts are subject to further analysis.
- Full compliance with CAM and BAL NC unlikely under current circumstances
- Opening up the second interconnector should improve the situation

Thank you !
