Opinion by the Energy Community Regulatory Board 01/2026

on the draft preliminary lists of Projects of Energy Community Interest (2026)

Approved by: ECRB Board
On: 28 August 2026

THE ENERGY COMMUNITY REGULATORY BOARD,

Having regard to its role in accordance with Energy Community acquis,

Having regard to Regulation (EU) 2022/869 of 30 May 2022 on guidelines for trans-European energy infrastructure, incorporated and adapted by Ministerial Council Decision 2023/02/MC-EnC of 14 December 2023 amending Annex I to the Energy Community Treaty to adapt to and adopt Regulation (EU) 2022/869 on guidelines for trans-European energy infrastructure and amended by Ministerial Council Decision 2023/03/MC-EnC of 14 December 2023 amending Article 2(2) of the Energy Community Treaty (hereinafter 'Energy Community TEN-E Regulation'), in particular, Annex III, section 2, point 14,

Whereas:

I. INTRODUCTION

(1). Energy Community TEN-E Regulation, provides for the identification of projects of Energy Community interest (hereinafter 'PECIs'), necessary to implement the needed power transmission infrastructure, energy storages, smart electricity grids, smart gas grids, hydrogen infrastructure, electrolysers and carbon dioxide infrastructure.

(2). According to Article 3 of the Energy Community TEN-E Regulation, a list of PECI shall be established every two years, on the basis of the preliminary lists adopted by the decision-making bodies of the Groups (hereafter 'PECI Groups') established pursuant to Section 1, point (1), of Annex III to the same Regulation.

(3). The Ministerial Council of the Energy Community is empowered to adopt the list of projects of Energy Community interest by way of a Decision under Title II of the Energy Community Treaty.

(4). According to Article 3, paragraph 5, of the Energy Community TEN-E Regulation, when establishing the Energy Community list, the Ministerial Council shall, amongst others, ensure cross-regional consistency, taking into account the opinion of the Energy Community Regulatory Board (hereinafter 'ECRB') as referred to in Section 2, Annex III, point 14 of the Energy Community TEN-E Regulation.

(5). According to Section 2, point 8, Annex III of the Energy Community TEN-E Regulation, for projects falling under their competence, the national regulatory authorities (NRAs) and, where necessary, the ECRB shall, where possible in the context of regional cooperation, check the consistent application of the criteria and of the cost-benefit analysis methodology and evaluate their cross-border relevance. They shall present their assessment to the Group.

(6). According to Section 2, point 14, Annex III of the Energy Community TEN-E Regulation, the draft preliminary lists of proposed projects falling under the competence of NRAs drawn up by the Groups, shall be submitted to the ECRB and, for information, to the Energy Community Secretariat, six months before the adoption date of the Energy Community list. The draft preliminary lists and the accompanying opinions shall be assessed by the ECRB within three months of the date of receipt. The ECRB shall provide an opinion on the draft preliminary lists, in particular on the consistent application of the criteria and cost-benefit analysis.

(7). On 5 June 2026, the PECI Group (for electricity) submitted to ECRB the draft list of proposed PECI and requested ECRB's opinion on the draft preliminary list and, in particular, on the consistent application of the criteria and the cost-benefit analysis by the end of August 2026.

(8). As no smart grid, hydrogen infrastructure, electrolyses and carbon dioxide infrastructure project is included in the preliminary PECI list, the ECRB opinion has relevance for electricity projects only.

(9). The present Opinion focuses on the application of the eligibility criteria, the assessment methodology and the consistency of the proposed projects with the objectives of the Energy Community TEN-E Regulation. It does not seek to replace the technical assessment carried out by the Consultant, nor to recommend a particular draft preliminary list, but rather to provide regulatory observations relevant for the final decision-making process.

II. ASSESSMENT

In accordance with Annex III, Section 2, point 14 of the Energy Community TEN-E Regulation, the ECRB assessed the consistency of the selection process, the application of the eligibility criteria, the assessment methodology and the draft preliminary list of Projects of Energy Community Interest (PECI) submitted by the Electricity PECI Group.

The assessment is based on the documentation submitted by the PECI Group (electricity), including the Final Assessment Report, the Data Validation and Scenario Report, the Analysis Techniques Guidance Document, the report on the public consultation, the minutes of the PECI Group meetings, and the draft preliminary lists of Projects of Energy Community Interest.

ECRB notes that, unlike the previous PECI selection cycle, three alternative draft preliminary PECI lists were submitted for consideration. While each list is based on the same assessment methodology and analytical framework, they reflect different approaches to the interpretation of the assessment results, in particular with respect to the treatment of the sensitivity analyses and the robustness of the projected long-term benefits.

Accordingly, the purpose of this Opinion is not to recommend a particular draft preliminary list, but rather to assess whether the selection process, the applied methodology and the resulting project assessments provide a sound and transparent basis for the identification of Projects of Energy Community Interest. Where appropriate, the ECRB also provides observations regarding the regulatory implications arising from the assessment results and the differences between the submitted draft preliminary lists.

1. Assessment of the selection process

Energy Community process for the identification of Projects of Energy Community Interest (PECI) was carried out in accordance with the provisions of the Energy Community TEN-E Regulation as adapted and adopted by the Ministerial Council Decision 2023/02/MC-EnC of 14 December 2023.

The selection process included the nomination of candidate projects, verification of eligibility criteria, collection and validation of project-specific and country-specific data, development of reference scenarios, application of the cost-benefit analysis (CBA) and multi-criteria analysis (MCA), public consultation, and discussion of the assessment results within the Electricity PECI Group before submission of the draft preliminary PECI lists to the ECRB.

ECRB notes that 27 projects were nominated during this PECI selection process, comprising 16 electricity-related and 11 gas-related projects. Following the eligibility assessment, eight electricity projects fulfilled the applicable eligibility criteria and proceeded to the detailed assessment phase. No gas projects were found eligible under the Energy Community TEN-E Regulation.

ECRB welcomes the improvements introduced in this PECI selection cycle compared to the previous process, including enhanced verification of project data, more comprehensive supporting documentation, increased interaction with the PECI Groups, and an extended period for stakeholder consultation and regulatory review. These improvements contribute to a more transparent and robust selection process.

ECRB further notes that comments received during the public consultation, including those concerning environmental aspects and project maturity, were presented to the Electricity PECI Group before preparation of the draft preliminary lists. While the assessment of such matters falls primarily within the competence of the relevant authorities, the ECRB considers that their transparent consideration strengthens the overall credibility of the selection process.

Overall, ECRB considers that the PECI selection process has been conducted in accordance with the Energy Community TEN-E Regulation and that the assessment process provides an appropriate basis for the identification of Projects of Energy Community Interest.

2. Assessment of the approach, methodology and selection criteria

ECRB notes that the assessment methodology applied by the Consultant is consistent with the requirements of the Energy Community TEN-E Regulation and broadly aligned with the methodologies applied under the EU TEN-E framework.

The assessment consisted of the verification of the general, specific and technical eligibility criteria, followed by a detailed assessment of eligible projects through cost-benefit analysis and multi-criteria analysis. Electricity transmission projects were assessed using the ENTSO-E Guideline for Cost-Benefit Analysis, while the electricity storage project was assessed using the methodology applicable to storage infrastructure. The assessment was supported by regional market and network simulations using recognised modelling tools.

ECRB welcomes the continued alignment of the PECI assessment methodology with established European practice and notes the improvements introduced in the second selection cycle, including enhanced documentation of modelling assumptions, strengthened data verification and a more comprehensive assessment of project maturity and non-monetised benefits.

ECRB further notes that, in addition to the reference assessment scenario, the Consultant performed a number of sensitivity analyses to evaluate the robustness of the assessment results under alternative assumptions relating to electricity demand, renewable energy deployment and long-term system adequacy. During the assessment process, additional sensitivity analyses were requested in order to further assess the influence of long-term security of supply benefits and the treatment of benefits beyond 2040.

ECRB considers that these sensitivity analyses constitute an integral part of the assessment framework. While they do not replace the reference assessment scenario, they provide important information regarding the robustness of the economic assessment and the degree to which the projected benefits of individual projects depend on key long-term assumptions. The ECRB therefore considers that both the reference assessment scenario and the sensitivity analyses should be taken into account when assessing the overall robustness of the results.

Overall, the ECRB considers that the approach, methodologies and assessment criteria have been applied consistently and in accordance with the Energy Community TEN-E Regulation. The methodology provides an appropriate basis for assessing the relative contribution of candidate projects to the objectives of the Energy Community energy transition and regional electricity market integration.

3. Assessment of the results

The ECRB notes that three alternative draft preliminary PECI lists were submitted together with the supporting assessment reports. The submitted lists contain different combinations of projects, while all are based on the same eligibility assessment, cost-benefit analysis and multi-criteria analysis undertaken by the Consultant.

ECRB further notes that all eight eligible projects demonstrate positive economic viability under the reference assessment scenario, with positive net present values and benefit-cost ratios exceeding one. On this basis, all eight projects satisfy the economic assessment requirements established under the applied methodology.

At the same time, the assessment demonstrates different levels of robustness when the results are tested under alternative sensitivity scenarios. In particular, the additional sensitivity analyses performed during the assessment indicate that the economic performance of certain projects is more dependent on assumptions relating to long-term system adequacy and the treatment of security of supply benefits beyond 2040 and 2050 than others. These findings were discussed within the Electricity PECI Group and documented in the Consultant's assessment.

ECRB understands that the differences between the submitted draft preliminary PECI lists primarily reflect different approaches to the interpretation of these sensitivity analyses rather than differences in the underlying assessment methodology. The ECRB therefore considers that the submitted lists should not be regarded as reflecting different methodological approaches, but rather different levels of confidence in the robustness of the projected long-term benefits.

ECRB further observes that the reference assessment scenario represents the principal analytical basis for the identification of candidate Projects of Energy Community Interest under the applied methodology. The sensitivity analyses provide additional information regarding the robustness of the assessment results and the degree to which the projected benefits depend on key long-term assumptions. Consequently, both elements should be considered together when evaluating the overall merits of candidate projects.

ECRB considers that, while the reference assessment demonstrates the contribution of all eligible projects to the objectives of the Energy Community TEN-E Regulation, the sensitivity analyses provide valuable additional information regarding implementation risks and the resilience of the projected benefits under alternative future developments. The interpretation of these findings ultimately requires the exercise of judgement in balancing long-term strategic objectives with the robustness of the underlying assumptions.

Accordingly, ECRB does not consider it appropriate to express a preference for any of the submitted draft preliminary PECI lists. Rather, the ECRB considers that the final decision should take into account the results of the complete assessment, including the eligibility assessment, cost-benefit analysis, multi-criteria analysis, sensitivity analyses and any relevant considerations relating to project maturity and implementation.

4. Regulatory observation on individual projects

Without prejudice to the final decision on the Energy Community PECI list, ECRB considers it appropriate to provide the following observations on the assessed projects.

- **E01 – Construction of the new interconnection, OHL 400 kV Gacko (BA) - Brezna (ME)**
  The assessment indicates that the project makes a significant contribution to regional market integration and security of supply and demonstrates robust economic performance under the reference assessment scenario. The project remains economically viable under the principal sensitivity analyses, although its benefit-cost ratio decreases under certain alternative assumptions relating to increased renewable generation. The ECRB has not identified any significant methodological concerns regarding the assessment of this project.

- E02 – Trans-Balkan Corridor, Double OHL 400 kV Bajina Basta (RS) – Visegrad (BA)/Pljevlja (MN) – BA and MN sections
  The project demonstrates strong economic performance and contributes significantly to regional market integration, cross-border transmission capacity and security of supply. The ECRB notes that the project consistently performs well across the analysed scenarios and no significant regulatory concerns have been identified regarding its assessment.

- E03 – New 400 kV interconnection between Montenegro and Bosnia and Herzegovina, 400 kV overhead line Brezna-Sarajevo 20 with construction 400/220 kV substation Piva's mountain
  The project satisfies the applicable eligibility criteria and demonstrates positive economic viability under both the reference assessment scenario and the analysed sensitivity scenarios. However, ECRB notes that concerns relating to project maturity, including the status of the environmental assessment process and the development of the preferred transmission corridor, and the fulfilment of certain technical and financial requirements under the applicable national approval procedures, were raised during the public consultation and discussed within the PECI Group (electricity). While these issues fall outside the scope of the economic assessment, ECRB considers that they are relevant to the overall readiness of the project and should be duly taken into account in the final decision-making process. In view of the outstanding concerns regarding project maturity and the national approval process, the ECRB does not support the inclusion of this project in the final PECI list at this stage.

- E04 – Rehabilitation of existing 220 kV lines Trebinje (BA) – Perućica (ME) – Podgorica (ME) – Vau Dejës (AL)
  The assessment demonstrates that the project provides significant benefits with respect to regional market integration, security of supply and socio-economic welfare. The project remains economically robust under the analysed sensitivity scenarios and the ECRB has not identified any significant methodological concerns.

- E05 – 400 kV interconnection corridor East-West, western section
  The assessment identifies significant benefits under the reference assessment scenario, particularly with respect to regional network development and long-term market integration. The ECRB notes, however, that the additional sensitivity analyses indicate that the economic justification of the project is more dependent on assumptions regarding future adequacy and long-term security of supply benefits than projects demonstrating robust performance across all analysed scenarios. This observation does not diminish the potential strategic importance of the project but indicates a higher degree of uncertainty associated with its projected economic benefits.

- E12 – Moglice Extension Pumped-Storage Hydropower Plant (PS Moglice Extension)
  The project represents the only electricity storage project assessed during the current PECI selection cycle and contributes to flexibility, balancing capability and the integration of renewable energy sources. The ECRB notes that the economic performance of the project is particularly sensitive to the treatment of long-term benefits in the sensitivity analyses. Nevertheless, the increasing importance of storage technologies for the transition towards a decarbonised electricity system should also be recognised when considering the broader strategic contribution of the project.

- E13 – Reconfiguration of 400 kV grid and new 400 kV interconnection Albania – Kosovo*[1]
  The assessment demonstrates positive economic performance under the reference assessment scenario and confirms the project's contribution to regional market integration. The ECRB notes that the additional sensitivity analyses indicate a greater dependence of the projected benefits on long-term adequacy assumptions than is the case for several other assessed projects. Accordingly, the robustness of the projected benefits should be considered together with the project's strategic contribution to regional integration.

- E15 – 330 kV OHL Balti (MD) - Dnestrovsk HPP-2 (UA)
  The assessment demonstrates the strongest economic performance among the assessed projects and confirms significant benefits with respect to regional market integration, security of supply and socio-economic welfare. The project remains economically robust under all analysed scenarios and no significant methodological concerns have been identified.

ECRB recognises that all eight projects satisfy the applied assessment methodology and demonstrate positive economic performance under the reference assessment scenario. At the same time, the additional sensitivity analyses indicate different degrees of dependence on long-term assumptions regarding future adequacy and security of supply, while the progress of national approval procedures and overall project maturity remains a relevant consideration for certain projects. These findings do not invalidate the assessment results but provide relevant information for decision makers when establishing the final PECI list.

[1] 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.

5. Regulatory observation on individual projects

Without prejudice to the outcome of the current PECI selection process, ECRB considers that future PECI selection processes could benefit from further improvements aimed at enhancing transparency, consistency and regulatory certainty.

In particular, the ECRB recommends that:

- where more than one draft preliminary PECI list is prepared, the accompanying documentation should clearly explain the rationale underlying each proposed list, including the methodological or policy considerations that distinguish one proposal from another;
- where the final draft preliminary list differs from the outcome of the consultant's assessment, the reasons for such differences should be clearly documented to facilitate the review and the subsequent decision-making process;
- the role of sensitivity analyses within the overall assessment framework should be further clarified, including the extent to which they are intended to inform the assessment of project robustness, project ranking or the preparation of draft preliminary PECI lists;
- the assessment reports should continue to provide transparent information regarding project maturity and implementation readiness, including, where relevant, the status of environmental assessment and permitting procedures;
- continued efforts should be made to align future PECI selection processes with the corresponding EU practices, thereby promoting regulatory convergence and consistency across Europe.

III. OPINION

Based on the information provided by the PECI Groups,

HAS ADOPTED THE FOLLOWING OPINION:

1. ECRB considers that the second PECI selection process has been conducted in accordance with the procedural requirements of the Energy Community TEN-E Regulation and that the overall assessment process was carried out in a transparent and structured manner.

2. ECRB considers that the eligibility assessment, cost-benefit analysis, multi-criteria analysis and supporting market and network modelling have been applied in accordance with the methodology established under the Energy Community TEN-E Regulation and provide an appropriate analytical basis for the assessment of candidate Projects of Energy Community Interest.

3. The ECRB notes that all eight eligible electricity projects demonstrate positive economic viability under the reference assessment scenario and satisfy the applicable assessment requirements for inclusion on the draft preliminary PECI list.

4. The ECRB further notes that the additional sensitivity analyses provide valuable information regarding the robustness of the projected benefits of candidate projects under alternative assumptions concerning future electricity system development. ECRB considers that these analyses should be taken into account together with the reference assessment when evaluating the overall robustness of the assessment results.

5. The ECRB notes that the three submitted draft preliminary PECI lists reflect different interpretations of the assessment results, particularly regarding the consideration of the sensitivity analyses and the robustness of projected long-term benefits.

6. ECRB considers that the final determination of PECI list should take into account the assessment as a whole, including the eligibility assessment, cost-benefit analysis, multi-criteria analysis, sensitivity analyses, project maturity and other relevant considerations identified during the assessment process including, where applicable, issues relating to the status of national approval procedures.

7. ECRB welcomes the improvements introduced in the second PECI selection process, in particular with respect to data validation, stakeholder consultation and the transparency of the assessment methodology, and encourages their continuation in future selection cycles.

8. The ECRB recommends that future PECI selection processes further enhance transparency by clearly documenting the rationale for the preparation of draft preliminary PECI lists, particularly where more than one alternative list is submitted. Such documentation should explain the considerations underlying each proposed list and facilitate the review of the assessment by the ECRB and the subsequent decision-making process.

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