



Energy
Regulatory Office

NATIONAL REPORT

OF THE PRESIDENT

OF THE ENERGY REGULATORY OFFICE

2026



WARSAW, JULY 2026

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LIST OF ABBREVIATIONS USED IN THE REPORT

ACER, Agency	Agency for the Cooperation of Energy Regulators
aFRR	Automatic Frequency Restoration Reserves
BC	Balancing Conditions
BM	Balancing Market
CEC	Citizen energy community
CDSO	Closed Distribution System Operator
CEF	Connecting Europe Facility
CEREMP	Centralised European Registry for Energy Market Participants
CCP	Central Counter Party
CCR	Capacity Calculation Region
CM	Commodity Market maintained by TGE S.A.
CSIRE	Central Energy Market Information System
DAM	Day-Ahead Market operated by TGE S.A.
directive 2019/944	Directive (EU) 2019/944 of the European Parliament and of the Council of 5 June 2019 on common rules for the internal market for electricity and amending Directive 2012/27/EU (EU OJ L 158/125, as amended)
DNC	Distribution Network Code
DSO	Distribution System Operator
DSOn	Electricity Distribution System Operator that, as at 1 July 2017, was not subject to the obligation to unbundle electricity distribution and trading activities
DSOp	Electricity Distribution System Operator that on 1 July 2007 unbundled its electricity distribution and trading activities and supplies electricity to at least 100,000 customers — for customers connected to distribution networks at all voltage levels, meaning industrial customers, medium and small businesses, and households
ECP	Energy Consumption Point
EGM	energy generation module
E gas	High-methane natural gas, group E
Electricity System Ordinance	Ordinance of the Minister of Climate and Environment of 22 March 2023 on Detailed Conditions of Electricity System Operation (Journal of Laws of 2025, item 919, as amended)
ENTSO-E	The European Network of Transmission System Operators for electricity
ERAA	European Resources Adequacy Assessment
ES	electricity storage
EU	European Union
FCR	Frequency Containment Reserve
Gas Tariff Ordinance	Ordinance of the Minister of Energy of 15 March 2018 on the Detailed Rules for Development and Calculation of Tariffs and Settlements in Trade in Gaseous Fuels (Journal of Laws of 2021, item 280, as amended)
GCP	Gas Consumption Point
GFM OTF	Gas Forwards Market of the Organised Trading Facility operated by TGE S.A.
GIM	Storage Installations Group

GTN	Gas Transmission Network owned by OGP GAZ-SYSTEM S.A.
IIP	Inside Information Platform
IDM	Intra-Day Market operated by TGE S.A.
IP	Interconnection Point
KZR INiG	System of the National Sustainable Development of the Oil and Gas Institute managed by the Oil and Gas Institute – National Research Institute
L gas	Nitrogenous natural gas, group L
Lw gas	Nitrogenous natural gas, group L, subgroup Lw
Ls gas	Nitrogenous natural gas, group L, subgroup Ls
LFC	Load-Frequency Control
LNG	Liquefied Natural Gas
NEMO	Nominated Electricity Market Operator
NES	National Electricity System
NTC	Net Transfer Capacities
NTYDP	National Ten-Year Development Plan for Transmission System of OGP GAZ-SYSTEM S.A.
OGP GAZ-SYSTEM S.A.	Operator Gazociągów Przesyłowych GAZ-SYSTEM S.A.
OTF	Organised Trading Facility on TGE S.A.
PCI	Project of Common Interest
PGNiG OD sp. z o.o.	PGNiG Obrót Detaliczny sp. z o.o.
PMG	Underground Gas Storage Facility
PPATs	Persons Professionally Arranging Transactions
PPAETs	Persons Professionally Arranging or Executing Transactions
PPETs	Persons professionally executing transactions
President of URE, regulator	President of the Energy Regulatory Office
President of UOKiK	President of the Office of Competition and Consumer Protection
PSE S.A.	Polskie Sieci Elektroenergetyczne S.A.
PSG sp. z o.o.	Polska Spółka Gazownictwa sp. z o.o.
Regulation 715/2009	Regulation (EC) No 715/2009 of the European Parliament and of the Council of 13 July 2009 on conditions for access to the natural gas transmission networks and repealing Regulation (EC) No 1775/2005 (EU OJ L 211/36, as amended)
Regulation 1348/2014	Commission Implementing Regulation (EU) No 1348/2014 of 17 December 2014 on data reporting implementing Article 8(2) and Article 8(6) of Regulation (EU) No 1227/2011 of the European Parliament and of the Council on wholesale energy market integrity and transparency (EU OJ L 363/121)
Regulation 2015/1222	Commission Regulation (EU) 2015/1222 of 24 July 2015 establishing a guideline on capacity allocation and congestion management (EU OJ L 197/24, as amended)
Regulation 2016/631	Commission Regulation (EU) 2016/631 of 14 April 2016 establishing a network code on requirements for grid connection of generators (EU OJ L 112/1, as amended)
Regulation 2016/1388	Commission Regulation (EU) 2016/1388 of 17 August 2016 establishing a network code on demand connection (EU OJ L 223/10)
Regulation 2016/1447	Commission Regulation (EU) 2016/1447 of 26 August 2016 establishing a network code on requirements for grid connection of high-voltage direct current systems and direct current-connected power park modules (EU OJ L 241/1)

Regulation 2016/1719	Commission Regulation (EU) 2016/1719 of 26 September 2016 establishing a guideline for forward capacity allocation (EU OJ L 259/42, as amended)
Regulation 2017/1485	Commission Regulation (EU) 2017/1485 of 2 August 2017 establishing a guideline on electricity transmission system operation (EU OJ L 220/1, as amended)
Regulation 2017/2195	Commission Regulation (EU) 2017/2195 of 23 November 2017 establishing a guideline on electricity balancing (EU OJ L 312/6, as amended)
Regulation 2017/2196	Commission Regulation (EU) 2017/2196 of 24 November 2017 establishing a network code on electricity emergency and restoration (EU OJ L 312/54, as amended)
Regulation 2019/943	Regulation (EU) 2019/943 of the European Parliament and of the Council of 5 June 2019 on the internal market for electricity (EU OJ L 158/54, as amended)
Regulation 2024/1366	Commission Delegated Regulation (EU) 2024/1366 of 11 March 2024 supplementing Regulation (EU) 2019/943 of the European Parliament and of the Council by establishing a network code on sector-specific rules for cybersecurity aspects of cross-border electricity flows (EU OJ L of 24.5.2024)
Regulation 2024/1789	Regulation (EU) 2024/1789 of the European Parliament and of the Council of 13 June 2024 on the internal markets for renewable gas, natural gas and hydrogen, amending Regulations (EU) No 1227/2011, (EU) 2017/1938, (EU) 2019/942 and (EU) 2022/869 and Decision (EU) 2017/684 and repealing Regulation (EC) No 715/2009 (recast) (EU OJ L 2024/1789)
EMD Regulation	Regulation (EU) 2024/1747 of the European Parliament and of the Council of 13 June 2024 amending Regulations (EU) 2019/942 and (EU) 2019/943 as regards improving the Union's electricity market design (EU OJ L 2024/1747)
REMIT Regulation	Regulation (EU) No 1227/2011 of the European Parliament and of the Council of 25 October 2011 on wholesale energy market integrity and transparency (EU OJ L 326/1)
REMIT II Regulation	Regulation (EU) 2024/1106 of the European Parliament and of the Council of 11 April 2024 amending Regulations (EU) No 1227/2011 and (EU) 2019/942 as regards improving the Union's protection against market manipulation on the wholesale energy market (EU OJ L 2024/1106)
BAL NC	Commission Regulation (EU) No 312/2014 of 26 March 2014 establishing a network code on gas balancing of transmission networks (EU OJ L 91/15)
CAM NC	Commission Regulation (EU) 2017/459 of 16 March 2017 establishing a network code on capacity allocation mechanisms in gas transmission systems and repealing Regulation (EU) No 984/2013 (EU OJ L 72/1)
INT NC	Commission Regulation (EU) 2015/703 of 30 April 2015 establishing a network code on interoperability and data exchange rules (EU OJ L 113/13)
TAR NC	Commission Regulation (EU) 2017/460 of 16 March 2017 establishing a network code on harmonised transmission tariff structures for gas (EU OJ L 72/29, as amended)
TEN-E Regulation	Regulation (EU) 2022/869 of the European Parliament and of the Council of 30 May 2022 on guidelines for trans-European energy infrastructure, amending Regulations (EC) No 715/2009, (EU) 2019/942 and (EU) 2019/943 and Directives 2009/73/EC and (EU) 2019/944, and repealing Regulation (EU) No 347/2013 (EU OJ L 152/45)
RES	Renewable Energy Sources
RRM	Registered Reporting Mechanism
SAIDI	System Average Interruption Duration Index
SAIFI	System Average Interruption Frequency Index
SFC	Storage Facilities Code for gaseous fuels
SGT EuRoPol GAZ S.A.	System Gazociągów Tranzytowych EuRoPol GAZ S.A.

SGU	Significant Grid Users
SOKiK	Court of Competition and Consumer Protection
SSO	Gas Storage System Operator
TGPS	Transit Gas Pipeline System owned by SGT EuRoPol GAZ S.A
TGE S.A.	Towarowa Giełda Energii S.A. (Polish Power Exchange)
TNC	Transmission Network Code
TSO	Transmission System Operator
TPA	Third Party Access
TYNDP	Ten Year Network Development Plan
URE, the Office	Energy Regulatory Office
Act of 7 October 2022	Act of 7 October 2022 on Special Solutions for the Protection of Electricity Customers in 2023 and in 2024 in connection with the Situation on the Electricity Market (Journal of Laws of 2024, item 1288, as amended)
Emergency Measures Act	Act of 27 October 2022 on Emergency Measures to Limit Electricity Prices and Support for Certain Customers in 2023–2025 (Journal of Laws of 2024, item 1622, as amended)
Act of 15 December 2022	Act of 15 December 2022 on Special Protection of Certain Customers of Gaseous Fuels in 2023 and 2024 in connection with the Situation on the Gas Market (Journal of Laws of 2024, item 303)
Act of 21 February 2025	Act of 21 February 2025 amending the Capacity Market Act and Certain Other Acts (Journal of Laws of 2025 item 290, as amended)
Energy Law Act	Act of 10 April 1997 – Energy Law (consolidated text, Journal of Laws of 2026 item 43, as amended)
Electromobility Act	Act of 11 January 2018 on Electromobility and Alternative Fuels (Journal of Laws of 2023, item 875, as amended)
Capacity Market Act	Act of 8 December 2017 on the Capacity Market (Journal of Laws of 2025, item 610, as amended)
Act on Stocks	Act of 16 February 2007 on Stocks of Crude Oil, Petroleum Products and Natural Gas, the Principles of Proceeding in Circumstances of a Threat to the Fuel Security of the State and Disruptions on the Petroleum Market (consolidated text, Journal of Laws of 2024, item 1281, as amended)
Act on Heating Voucher	Act of 12 September 2025 on Heating Voucher and Amending Certain Acts to Control Electricity Prices (Journal of Laws of 2025, item 1302, as amended).
Amendment to the Electromobility Act	Act of 2 December 2021 amending the Act on Electromobility and Alternative Fuels and Certain Other Acts (Journal of Laws of 2021, item 2269)
ZUP	Shipper

Legal status as at 31 July 2026

1. FOREWORD

Dear All,

This National Report of the President of URE offers a comprehensive overview of the situation on the Polish electricity and gas market in 2025. The report also outlines the measures taken by the Polish regulator to promote competition, balance the interests of energy companies and customers, and integrate the Polish electricity and gas markets with the EU market.

The year 2025 was the first full year in which the new tools and market opportunities introduced by the comprehensive amendment to the Energy Law Act of 2023 – such as dynamic-price contracts – were available. In 2025, distribution tariffs for electricity were also approved, which allow for the use of flexibility services or include tariff groups designed for customers with dynamic-price contracts.

With regard to gas, the regulator has taken steps to establish, beginning in 2027, an integrated natural gas entry/exit system comprising the networks belonging to the gas transmission operator OGP GAZ-SYSTEM S.A. and the EuRoPol GAZ transit pipeline system. As part of these measures, the President of URE conducted the first consultations on the 'Inter-operator Settlement Mechanism' for the operators of these networks. The creation of a single entry-exit system will not only simplify the order placement procedure for gas transmission capacity by market participants in Poland, but will also reduce the costs of transmission services between Poland and Germany via the Mallnow interconnector.

A detailed description of the condition of the electricity and gas market in Poland and actions taken by the Polish Regulator in 2025 have been presented in this National Report of the President of URE, submitted to the European Commission and ACER. In doing so, the President of URE fulfils its reporting obligation under Polish and European law.

2. LEGAL AND REGULATORY CHANGES ON THE ELECTRICITY AND GAS MARKET

2.1. LEGAL AND REGULATORY CHANGES

Legal changes

In 2025, a number of legislative acts were adopted and brought into force, leading to significant amendments to energy law in the broad sense, affecting market participants and the regulator itself. Furthermore, based on the legislative work underway in 2025 involving the President of URE, a further increase in this body's powers is anticipated in the coming years.

The Act of 21 May 2025 amending the launch date of the CSIRE was crucial to the functioning of the energy market¹. It laid down regulations enabling the comprehensive, phased implementation of the CSIRE by introducing a series of amendments to other legal acts. Among others, this Act clarified the date from which energy market participants were to commence carrying out their tasks via the CSIRE, including through the institution of the virtual prosumer, the definition of which was amended. It also regulated – during a transitional period – the rules governing the operation of back-up sales and the supplier of last resort. Some of the Act's provisions will not come into force until 2026.

Substantial amendments have been adopted in the Capacity Market Act. Two new types of auctions have been introduced: supplementary auctions and catch-up auctions. The first type of auction, established by an amendment to the Capacity Market Act, was introduced by using the option to derogate from the provisions of Regulation 2019/943, which set out the requirements regarding CO₂ emission limits for generation capacity mechanisms. The emission limit in the capacity market significantly restricted the number of entities competing in capacity market auctions. An exception to this rule, allowing entities emitting more than 550 kg CO₂/MWh to participate in the capacity market and compete with other entities, for a limited period and under rigorous conditions, was provided for by the EMD Regulation, which was subsequently utilised by the Polish legislator through the design of the supplementary auction mechanism. These are auctions that may be held for the years 2025 (second half) to 2028, and in which, subject to certain conditions, entities that no longer meet the so-called emission limit requirement may still participate. Meanwhile, the introduction of catch-up auctions has made it possible to supplement capacity contracts entered into as a result of a concluded main auction, in cases where the results of that auction do not ensure the medium- or long-term security of electricity supply to final customers. A catch-up auction is a capacity auction with a delivery period of one calendar year, which may be held following the main auction for a given delivery year. These changes were introduced by the Act of 21 February 2025.

Following the stabilisation of the fuel and energy markets in 2025, after a period of dramatic upheaval caused by the COVID-19 pandemic and Russia's invasion of Ukraine, amendments were made to the legislation providing support for consumers in the fuel and energy markets. Despite the economic situation returning to normal, large groups of the population continued to require state support to mitigate the consequences of the crisis. The legislative changes were therefore primarily aimed at ensuring stability and a more accurate reflection of market conditions in the prices and rates of fees for fuel and energy. The Act of 23 April 2025² postponed the deadlines for submitting electricity tariff applications to the President of URE for the benefit of eligible consumers.

¹ The Act of 21 May 2025 Amending Certain Acts in Connection with the Introduction of the Central Energy Market Information System and Other Acts (Journal of Laws of 2025, item 759).

² The Act of 23 April 2025 Amending the Act on Special Measures to Protect Electricity Consumers in 2023 and 2024 in Connection with the Situation on the Electricity Market (Journal of Laws of 2025, item 565).

In 2025, the Act on Stocks was amended twice. The Act of 25 July 2025³ reorganised the procedure for supervising the conclusion of contracts between participants in the fuel market. The previously applicable provisions required producers and traders to obtain the consent of the President of the RARS (Governmental Agency for Strategic Reserves) to conclude a contract for the performance of tasks relating to the creation and maintenance of mandatory stocks of crude oil or fuels. This Act altered the aforementioned mechanism – instead of consent, the institution of objection by that body, in the form of an administrative decision, was introduced. Consequently, the content of the specifications submitted to the President of URE has also been adjusted to the new procedure. The previous specification of entities against which a decision refusing consent had been issued, has been replaced by a specification of producers and traders against whom an objection has been lodged. In a subsequent amendment to the Act on Stocks, introduced by the Act on Heating Vouchers, the possibility for RARS to provide the so-called ‘ticket service’ was extended, among others.

Regulatory changes

CSIRE

In 2025, work continued on the project to implement the CSIRE system, which, as a centralised IT system in Poland, collects technical and commercial data relating to the energy market. Managed by the Energy Market Information Operator, it facilitates the exchange of data between market participants, is designed to support the process of switching electricity suppliers and enable consumers to access their meter readings, as well as to assist them in making informed decisions regarding the use of the TPA principle (supplier switching) within the electricity trading market. This process is carried out with significant involvement from electricity distribution system operators, which last year continued the nationwide process of replacing electricity metering and billing systems (meters) with systems capable of collecting hourly and daily data and ensuring their transfer to the CSIRE system as part of a nationwide database accessible to all customers and trading companies, whilst adhering to the relevant data exchange procedures and ensuring the security of information flow within the electricity market.

Assessment of the balancing market

In 2025, the President of URE presented an assessment of the functioning of the balancing market and recommendations for improving its operation. This was in fulfilment of a task assigned to the President of URE to prepare a study on measures aimed at reducing the impact of allocation constraints in the Polish electricity system, including an assessment of the application of allocation constraints since the entry into force of the second stage of the balancing market reform, along with a justification for their application, an assessment of the effectiveness of current measures to mitigate the impact of allocation constraints; and recommendations for additional measures aimed at reducing, as far as possible, the application of allocation constraints in the Polish electricity system⁴. On 3 December 2025, a document entitled “Assessment of the impact of the balancing market reform on the application of allocation constraints in the national electricity system during the period 14 June 2024–30 June 2025, and recommendations for further action” was published on the Office’s website. Despite a significant reduction in the application of allocation restrictions, the President of URE considers it necessary to take measures that will improve the functioning of the energy market and lead to a further reduction in the application of allocation restrictions. The report contains 11 recommendations which focus on

³ Act of 25 July 2025 on Special Principles for the Preparation and Implementation of Strategic Investments for State Defense Needs or Key Investments for State Defense Needs or Public Safety, and on the Establishment of Protection Zones for Closed Areas (Journal of Laws of 2025, item 1080).

⁴ The task assigned to the President of URE by the Council’s implementing decision of 27 May 2025 amending Implementing Decision (EU) (ST 9728/22 INIT; ST 9728/22 ADD 1) of 17 June 2022 on the approval of the assessment of Poland’s recovery and resilience plan.

increasing the flexibility of the electricity system, improving its stability and making better use of distributed energy resources. In the opinion of the President of URE, digitalisation, regulatory changes and the introduction of economic mechanisms influencing the behaviour of market participants play a key role.

New services provided as part of the liquefied natural gas regasification operations at the Świnoujście LNG Terminal

Since 1 January 2025, following the completion of the expansion programme for the Świnoujście LNG Terminal – namely, the commissioning of the third LNG storage tank and the infrastructure at the new quay – new additional services have been offered:

- small-scale loading (up to 18,500 m³ of LNG),
- large-scale loading, transshipment from one LNG carrier to another – the services provided include a transshipment capacity of 10,000 m³ of LNG per hour,
- refuelling of vessels powered by LNG (so-called bunkering).

Furthermore, since December 2025, OGP GAZ-SYSTEM S.A., the operator of the Świnoujście LNG Terminal, has held a KZR INiG certificate confirming that its operations comply with the sustainability requirements of the RED Directive. Having obtained the KZR INiG certificate, the operator has launched a new service for issuing Proofs of Sustainability (PoS). The service covers volumes of LNG processed as part of regasification and ancillary services. The service has been available since 1 December 2025.

The Proof of Sustainability issuing service complements the regasification and ancillary services offered at the Świnoujście LNG Terminal. Proofs will be issued in accordance with the principles of the sustainability chain, supporting OGP GAZ-SYSTEM S.A.'s customers in implementing their ESG strategies and long-term energy transition objectives.

Mandatory stocks of natural gas

Until 30 September 2025, a temporary extension to 50 days applied to the maximum period for delivering the entirety of mandatory natural gas stocks from storage facilities to the gas system. As of 1 October 2025, the general rules were reinstated, under which the maximum period for delivering mandatory stocks to the gas system is no more than 40 days.

Due to limited domestic storage capacity, part of the mandatory natural gas stocks was held outside Poland.

As a result of the increase in the volume of mandatory natural gas stocks and the reintroduction of stricter regulations limiting the permitted timeframe for withdrawing accumulated stocks from storage facilities, as of 1 October 2025, energy companies have been forced to increase their contracting of gas storage services outside Poland in order to fulfil their obligation to establish and maintain stocks, given the limited availability of storage services within the country.

Integration of SGT and NTS

One of the major events of 2025 relating to the gas market was the preparation of the integration of the transmission network owned by OGP GAZ-SYSTEM S.A. and the transmission network owned by SGT EuRoPol GAZ S.A. – for which OGP GAZ-SYSTEM S.A. acts as the transmission system operator – into a single entry/exit zone.

These measures were implemented in cooperation with the NTS and TGPS operator. As part of these measures, in 2025 the President of URE conducted the first consultations on the Inter-operator Settlement Mechanism for the operators of these networks. Meanwhile, OGP GAZ-SYSTEM S.A. developed, pursuant to Article 17(4) and (5) of Regulation 2024/1789, the Method for Setting

Reference Prices for the years 2027–2031, which provided for the creation of a single integrated natural gas entry/exit system comprising the NTS and TGPS.

The introduction of a uniform network tariff (Article 17(4) of Regulation 2024/1789) will simplify the process of ordering transmission capacity within the NTS and TGPS and standardise the rules for payment for ordered transmission capacity at interconnection points, thereby eliminating commercial constraints arising from differences in tariff rates. In particular, the charge for ordered transmission capacity at the exit point from the TGPS and at the entry point to the NTS, that is, at the existing IP, will be abolished.

The final shape and duration of the method for determining reference prices for the years 2027–2029 were specified in the decision of the President of URE issued on 26 March 2026⁵.

2.2. IMPLEMENTING THE "CLEAN ENERGY FOR ALL EUROPEANS" PACKAGE

Article 16(8) of Regulation 2019/943 imposed an obligation on the electricity TSO to make cross-zonal capacity available to market participants at a level of not less than 70% of the capacity at a given border or critical network element, determined respecting operational security limits of the system. As the aforementioned conditions could not be fulfilled by the Polish electricity TSO at the moment of the entry into force of the aforementioned regulation, pursuant to Article 15 of the aforementioned Regulation an action plan was developed by the Ministry of Energy, in cooperation with the President of URE and the Polish electricity TSO, adopted on 17 December 2019, which defines the level of minimum cross-zonal trading capacities to be made available to market participants by the Polish electricity TSO from the beginning of 2020 until the end of 2025. This plan also included a timetable for the adoption of measures to achieve the target level of minimum capacity of 70% of the transmission capacity in accordance with Article 16(8) of Regulation 2019/943.

Regulation 2019/943, in Article 16(9), provides for the possibility of granting a derogation from the obligation to make cross-zonal capacity available in accordance with paragraph 8 of that Article where this is necessary to maintain operational security. In 2025, the decision of the President of URE of 10 December 2024 was in force⁶ granting PSE S.A. such a derogation. On 18 December 2025, the decision of the President of URE for 2026 was issued⁷.

On 10 July 2025, the President of URE, pursuant to Article 15(4) of Regulation 2019/943, approved the contribution to the electricity TSO's report for 2024 on capacity sharing in accordance with the linear trajectory specified in the action plan⁸.

In 2025, the regulator prepared a report on redispatching mechanisms⁹, which is an obligation under Regulation 2019/943. Pursuant to Article 13(4) of the Regulation, this report has been prepared on the basis of the reports on redispatching mechanisms for 2024 received from electricity TSO and DSO for the first time. The report was then submitted to ACER and published on the website.

The regulator was also involved in cases proceeded by ACER under the said Regulation.

⁵ <https://www.ure.gov.pl/pl/biznes/taryfy-zalozenia/metoda-wyznaczania-cen-referen/13188,Decyzja-Prezesa-URE-w-sprawie-Metody-wyznaczania-cen-referencyjnych-nr-4KSPSGT-d.html>

⁶ <https://www.ure.gov.pl/pl/energia-elektryczna/europejskiree/decyzje/12313,Decyzja-zatwierdzajaca-odstepstwo-od-obowiazku-udostepniania-miedzystrefowych-zd.html>

⁷ <https://www.ure.gov.pl/pl/energia-elektryczna/europejskiree/decyzje/13013,Decyzja-przyznajaca-PSE-SA-odstepstwo-od-obowiazku-udostepniania-miedzystrefowyc.html>

⁸ <https://www.ure.gov.pl/pl/energia-elektryczna/europejskiree/decyzje/12755,Decyzja-zatwierdzajaca-wklad-PSE-SA-do-sprawozdania-za-2024-r-o-ktorym-mowa-w-ar.html>

⁹ <https://www.ure.gov.pl/pl/urzed/informacje-ogolne/edukacja-i-komunikacja/publikacje/sprawozdania-prezesa-ure-dotyc/12335,Sprawozdania-dotyczace-mechanizmow-redysponowania-w-Polsce.html>

3. ELECTRICITY MARKET

3.1. NETWORK REGULATION AND TECHNICAL FUNCTIONING

3.1.1. Unbundling

In the light of the current regulations of the Energy Law Act, operators for electricity and gas system (hereinafter referred to as "system operators") are designated by decision of the President of URE:

- at the request of the owner of the network or installation referred to in Article 9h para. 1 of the Act,
- ex officio in the cases specified in Article 9h para. 9 of the Act.

Pursuant to Article 9d para. 1d of the Energy Law Act (in force in 2025), a distribution system operator and a hydrogen distribution system operator within the structure of a vertically integrated enterprise remain independent of other activities not related to the distribution of gaseous fuels, electricity or hydrogen in terms of their legal and organisational form and decision-making. Pursuant to Article 9d para. 1e of the Act, in order to ensure the independence of the distribution system operator and the hydrogen distribution system operator, the following independence criteria must be met jointly:

- 1) persons responsible for the management of the distribution system operator or the hydrogen distribution system operator may not participate in the management structures of a vertically integrated enterprise or an energy enterprise involved in the transmission, production, generation or trading of gaseous fuels or transmission, generation or trading of electricity, or transmission, generation or trading of hydrogen, or be responsible, directly or indirectly, for current activities in this area,
- 2) persons responsible for the management of the distribution system operator or the hydrogen distribution system operator are guaranteed to have the possibility to act independently,
- 3) the distribution system operator or the hydrogen distribution system operator has the right to make independent decisions regarding the assets necessary to conduct business activity, in the field of distribution of gaseous fuels, electricity or hydrogen,
- 4) a body of a vertically integrated enterprise may not issue instructions to the distribution system operator or the hydrogen distribution system operator regarding their current operations or take decisions on the construction of the network or its modernisation, including when guaranteeing funds for the implementation of the guidelines of the President of URE referred to in Article 16 para. 1a, unless these instructions or decisions relate to the operation of the distribution system operator or the hydrogen distribution system operator that goes beyond the approved financial plan or other equivalent document.

In addition, pursuant to Article 9d para. 1h of the above-mentioned Act, the transmission system operator, the distribution system operator and the combined system operator may not conduct business activities related to the production, generation or trading of gaseous fuels or electricity, or perform such activities on the basis of an agreement for the benefit of other energy companies.

Detailed requirements for electricity distribution system operators are also included, among others, in Article 9d para. 1i, 3-6 of the Act.

On the other hand, pursuant to Article 9d para. 7 of the Energy Law Act, the provisions of paras. 1d, 1e and 1h-6 do not apply, among others, to a vertically integrated enterprise servicing:

- less than one hundred thousand customers connected to the electricity distribution system of that enterprise,

- an electricity distribution system with an annual electricity consumption not exceeding 3 TWh in 1996, in which less than 5% of the annual electricity consumption came from other interconnected electricity systems,
- less than one hundred thousand customers connected to the gas distribution system of that enterprise,
- less than one hundred thousand customers connected to the gas distribution system of that enterprise, if the enterprise's sales relate to gaseous fuels other than high-methane or nitrogenous natural gas, including liquefied natural gas, supplied via the gas network.

It should be noted that the above-mentioned derogations apply to a vertically integrated enterprise (as a whole), and not to individual entities forming part of it, which means that the number of customers or annual energy consumption or sales of gaseous fuels referred to in Article 9d para. 7 items 1 and 2 of the Act should be referred to the assessment of the entire corporate group, and not to individual companies that are part of it.

There is one electricity transmission system operator in Poland – Polskie Sieci Elektroenergetyczne S.A. On 4 June 2014 a certificate of complying with independence criteria determined in Article 9d para. 1a of the Energy Law Act for the period until 31 December 2030 was granted to PSE S.A. Compliance with independence criteria and conditions of conducting licensed activity and exercising the electricity TSO function is monitored and periodically examined. In 2025 no irregularities in the functioning of the electricity TSO were found.

In 2025, as in previous years, there were five large electricity DSOs on the electricity market, supplying electricity to no fewer than 100,000 customers connected to their distribution networks, which, on 1 July 2007, separated their distribution activities from those relating to electricity generation or trading (unbundling).

In addition, at the end of 2025, there were 187 other electricity DSOs operating.

3.1.2. Network extension and optimisation

Monitoring investment plans of transmission system operators

PSE S.A. performs investment tasks in accordance with the development plan agreed with the President of URE with respect to meeting the current and future demand for electricity. The draft development plan of this operator – pursuant to a provision arising from Article 13 para. 13 of the Energy law Act – is subject to reconciliation with the President of URE acting in agreement with the minister competent for energy. When reconciling the electricity TSO draft development plan, the President of URE verifies first of all the compliance of its content with the Energy Law Act and its implementing regulations and with the assumptions of the state's energy policy, cooperating with the locally competent voivodship boards, and additionally agrees on investment outlays in such an amount that the costs resulting from them may constitute the basis for tariff calculation, in compliance with the requirement referred to in Article 16 para. 10 of the Energy Law Act, according to which the plan should ensure long-term maximisation of the efficiency of outlays and costs incurred by energy companies so that outlays and costs do not cause an excessive increase in electricity prices and fee rates in particular years, while ensuring continuity, reliability and quality of supplies.

In 2025, the development plan for meeting current and future electricity demand for 2025–2034 agreed with the President of URE on 20 December 2024 was in force, under which investment expenditures to be executed by the electricity TSO in these years were agreed at PLN 66,425.76 million (data at fixed prices of 2024).

As part of the implemented tasks regarding the monitoring of investment plans, analyses of the performance of the volumes planned for a given year are conducted annually, the results of which

are used in the process of agreeing subsequent editions of development plans or their updates. As it follows from the report on the implementation of the development plan for 2025 (which enterprises are obliged to submit, pursuant to Article 16 para. 18 of the Energy Law Act), the TSO notified about the execution of planned investment outlays of PLN 2,516.7 million (that is 58.2%, with the plan assumed for that year of PLN 4,320.6 million).

Assessment of consistency of TSOs' investment plans in terms of compliance with the EU-wide network development plan

When agreeing on the draft electricity TSO's development plan, the President of URE shall also verify its consistency with the ten-year EU-wide network development plan ("TYNDP"), developed by ENTSO-E. The consistency of both plans shall be checked at each update of any of the above-mentioned documents.

As part of its investment activities, in 2025 the electricity TSO carried out significant projects relating to the expansion of the transmission network, including interconnections, and to increasing technical transmission capacity for the purposes of cross-border exchange, as set out in the EU's TYNDP 2022. These tasks have been incorporated by the TSO into the current version of the development plan for 2025–2034, as agreed with the President of URE. Certain adjustments to the projects specified in the TYNDP 2024 (e.g. the construction of the Poland–Lithuania interconnector in its onshore version) will be incorporated into the TSO's new plan (the currently applicable plan provides for two alternative versions: direct-current subsea interconnectors and an onshore interconnector).

Based on an analysis of the compliance of previous versions of the TSO's investment plans with the EU-wide network development plan, it can be concluded that there may be minor discrepancies of a planning nature. These stem primarily from the different timings of updates to the TYNDP documents and the TSO's development plan; consequently, subsequent editions of these documents may incorporate information that varies in how up-to-date it is regarding the status of project implementation and the anticipated completion dates.

Monitoring investment plans of distribution system operators

Energy companies carrying out business activities in the field of electricity distribution execute investment projects in accordance with development plans designed to meet current and future demand for electricity. Drafts of these plans, drawn up pursuant to Article 16 of the Energy Law Act, are subject to approval by the President of URE, acting in consultation with the Minister responsible for energy, with the exception of companies meeting the criteria set out in Article 16 para. 13 of that Act.

In 2025, the five largest electricity DSOs were implementing development plans to meet current and future electricity demand, as agreed with the President of URE in 2023, covering the period 2023–2028, with one of the plans having been updated in 2024.

The modernisation processes carried out by the DSOs, in accordance with the development plans reconciled with the President of URE, led to noticeable effects in the decrease of SAIDI and SAIFI indices for distribution companies. A significant contribution to this goal was made by the quality regulation implemented in 2015, which assumed a significant decrease in these indices over a period of several years.

In 2025, the electricity supply reliability indicators in the networks of most of the companies of the largest DSOs improved. When taking into account the combined results of the five DSOs, it should be indicated that they are better in relation to those achieved in 2024 by 11.3% for the SAIDI index and by 9.4% for the SAIFI index, respectively.

The SAIDI index (for unscheduled interruptions including disaster and scheduled interruptions) for the five largest DSOs was 179.24 min/customer in 2025 and decreased by 23.02 min/customer compared to the previous year.

The SAIFI index (for unscheduled interruptions including disaster and scheduled interruptions) for the five largest DSOs was 2.47 units/customer in 2025 and decreased by 0.26 units/customer compared to the previous year.

In 2025, according to the companies' reports, in the majority of cases, the main causes of outages and disruptions in the distribution network – and the resulting interruptions to the supply of electricity to customers connected to the respective DSOs' networks – were:

- adverse weather conditions (storms, heavy rain, heavy snowfall and gales),
- deterioration in the performance of distribution network components due to ageing and material fatigue,
- actions by unauthorised persons,
- interference from animals.

In their reports on the implementation of the development plan for 2025, the five largest electricity distributors notified of:

- the predominant share of outlays (in total outlays) for investments related to network investments, that is, those serving directly to fulfil the statutory obligations of the distribution system operator and to fulfil the obligations under its licence to provide distribution services, including investments related to the connection of electricity customers and producers and the modernisation and restoration of existing assets, related to the improvement of service quality and/or the increase in demand for capacity. These investments were aimed at both the construction of new elements of the power grid and the modernisation of existing elements. At the same time, it should be noted that the modernisation tasks were in most cases related to increasing the performance parameters of the grid, enhancing its functionality and applying solutions facilitating changes in the management of the power grid operation,
- a significant factor shaping the level of expenditure realised in 2025, which was the implementation of investment activities in the area of grid connection,
- implementation of investments necessary to adapt and rebuild its network in order to implement the increasing number of connections of distributed sources (including the prosumer market), DSOs, as well as investments related to the development of e-mobility,
- continuation and at the same time intensification of activities related to the deployment in the network of devices performing switching functions and devices monitoring the state of electrical parameters of the network, in order to achieve the smart grid standard. In order to fully exploit the network automation functionalities and achieve optimum benefits resulting from the automation, actions related to the change of the current network topology were carried out in parallel, with the aim of adapting the network in the long run to the possibility of bilateral supply of MV/IV substations,
- continuation of activities intended to improve operational efficiency, further construction as well as development of IT and telecommunications systems and systematic strengthening of the infrastructure supporting distribution activities through the acquisition of means of transport, in particular specialised equipment, tools, as well as the construction and modernisation of facilities.

Nonetheless, the priority for the companies in 2025 was to connect new entities to the grid, both customers and generators, and to provide them with the highest possible level of energy security, understood as an uninterrupted supply of energy of appropriate quality (SAIDI/SAIFI indices and appropriate voltage and frequency levels).

The difference in the execution of investment expenditures compared to the agreed plans resulted, among others, from the performance of investment tasks not included in the agreed development plan (increase in connection capacity, modernisation work aimed at strengthening the grid and improving the reliability of the power supply), as well as an increase in costs of construction works.

Out of five large DSOs, four companies incurred expenditures higher than agreed and one company incurred expenditures lower than those agreed. Considering the implementation of the development plan of all large DSOs, it should be emphasised that the expenditures made in relation to those agreed were incurred at the level of about 105%.

The main differences in the development plan regarding the implementation of tasks in 2025 compared to the planned ones resulted from the need to adapt the company's activities to the market environment. Adjustments in terms of decreasing or increasing investments were made for various reasons, namely:

- slower or faster development of new settlements,
- abandonment of the construction of their facilities by investors,
- emergence of new investors expecting the connection to be completed in 2025,
- delays resulting from the lack of development of project documentation, caused by difficulties in obtaining consent for the location of power grids,
- administrative barriers, delays in obtaining formal and legal documents related to the implementation of large investment tasks related to the network development,
- increase in the prices of materials and services.

The investment projects completed sought to:

- ensure the correct parameters of the electricity supplied to consumers,
- connect new entities to the grid,
- create opportunities for future connections and covering increased capacity demand by existing customers,
- reduce electricity losses
- decrease of equipment failure rate,
- improve reliability of network operation.

To summarise, the actions undertaken as part of the implemented development plan of particular companies were mainly aimed at satisfying the needs of consumers, ensuring the energy security of the system, reducing the SAIDI, SAIFI and CRP ratios, and were in line with the companies' strategies.

3.1.3. Network tariffs

In 2025 the President of URE conducted proceedings regarding approval of electricity tariffs and modifications to these tariffs for:

- 1) transmission system operator – for entities using the transmission service under a transmission contract,
- 2) distribution system operators, namely:
 - a) the largest distribution system operators which, on 1 July 2007, performed unbundling of their activity and which supply energy to no fewer than 100,000 customers (DSOp) – for customers connected to distribution networks at all voltage levels, that is industrial customers, small and medium-sized businesses, and households;
 - b) other distribution system operators which were not required to unbundle their electricity distribution and trading activities (DSOn).

The rules for calculating tariffs for electricity companies are governed by the provisions of the Ordinance of the Minister for Climate and Environment of 29 November 2022 on the Method of Setting and Calculating Tariffs and the Method of Settlement in the Electricity Market (consolidated text, Journal of Laws of 2024, item 904, as amended).

Approval of the tariff for the electricity TSO

As of 1 January 2025, the electricity TSO tariff approved by the President of URE by decision of 17 December 2024 was in force. In September 2025, the President of URE called upon PSE S.A. to submit an application for approval of the tariff for 2026, in respect of the company's operations. The electricity TSO submitted its application at the end of September 2025, and the tariff submitted was calculated as a one-year tariff. During the administrative proceedings, both the costs and the volumes of energy and capacity forming the basis for the calculation of transmission charges were analysed. In addition, pursuant to the Ordinance of the Minister for Energy of 12 December 2025 amending the Ordinance on the Method of Setting and Calculating Tariffs and the Method of Settlement in the Electricity Market¹⁰, the calculation of the electricity TSO tariff took into account the amended rules for the classification of customers regarding the application of a reduced coefficient in settlements relating to the quality charge. The proceedings concerning the approval of the tariff for 2026 concluded with the issuance, on 16 December 2025, of a decision by the President of URE approving the electricity TSO tariff. The total average price resulting from the approved PSE S.A. tariff increased by approximately 3.5%. The increase in TSO rates translates into an increase in DSO rates.

Approval of tariffs for electricity DSOp

As of 1 January 2025, the tariffs of five largest electricity distribution system operators, approved on 17 December 2024, were in force. These tariffs, as was the case in recent years, were calculated on the basis of assumptions developed for one year only. Also, DSOp's tariffs for 2026 have been calculated on the same principles.

Guidelines for calculating tariffs have been described in the document "DSO TARIFFS FOR 2026 (applies to DSOs which unbundled their business as of 1 July 2007)" and together with appendices they were provided to individual DSOp in the course of administrative proceedings.

In addition, information¹¹ of the President of URE on the basic assumptions adopted in the process of tariffing the distribution sector, which describes the key parameters included in the calculation of DSOp tariffs for 2026, has been published on the URE website.

The calculation of DSOp's tariffs for 2026 was once again carried out taking into account some of the existing rules arising from the assumptions adopted for these companies, but also new solutions.

Applications for approval of tariffs for electricity distribution services for 2026 were submitted by the five largest DSOp, namely PGE Dystrybucja S.A., TAURON Dystrybucja S.A., ENEA Operator Sp. z o.o., ENERGA-OPERATOR S.A. and Stoen Operator Sp. z o.o., at the end of October 2025. Energy companies holding licences shall submit their tariffs to the President of URE on their own initiative no later than two months before the expiry of the previous tariff period or at the request of the President of URE¹². On 17 December 2025, the President of URE issued a decision approving tariffs for electricity distribution services for the period until 31 December 2026 for each of the above mentioned DSOp.

As a result of the approved tariffs, distribution fee rates (the fixed component of the network rate, the variable component of the network rate and the subscription rate), which were calculated on the basis of the justified costs of the DSOp operations, including the costs of purchasing transmission services from the electricity TSO, have increased on average by 0.7% for all customers. For customers in tariff group G, these rates increased by an average of 0.3%.

By contrast, the total average distribution rates, which also take into account additional charges borne by customers under separate legal provisions – namely the RES charge, the cogeneration charge

¹⁰ Journal of Laws of 2025, item 1772.

¹¹ <https://www.ure.gov.pl/pl/biznes/taryfy-zalozenia/zalozenia-dla-kalkulacji/13120,Ogolne-zalozenia-do-kalkulacji-taryf-OSD-na-2026-r.html>

¹² Article 47 of the Energy Law Act.

and the capacity charge – rose by an average of 9.4% for final customers. For customers in tariff group G, the average increase in these rates was 7.6%.

Approval of tariffs for DSOs

In addition to tariffs for the transmission system operator, distribution system operators and suppliers acting as default suppliers, the President of URE also approves electricity tariffs for so-called industrial energy companies, namely companies that had no obligation to unbundle their electricity distribution and trading activities. These tariffs are approved:

- with regard to the distribution activity – with respect to consumers of all tariff groups at all voltage levels,
- with regard to the trading activity – only with respect to household consumers (tariff groups G) connected to the network of the given company.

In 2025, the President of URE approved 138 tariffs and 42 tariff modifications for DSOs.

Approval of tariffs for largest trading companies exercising the function of default suppliers

A default supplier is an energy company holding a licence to trade in gas or electricity, which provides comprehensive services to domestic gas or electricity consumers who do not exercise their right to choose a supplier. Currently, the largest default suppliers in the country are: PGE Obrót S.A., ENEA S.A., ENERGA – Obrót S.A., TAURON Sprzedaż sp. z o.o., TAURON Sprzedaż GZE sp. z o.o. and E.ON Polska S.A..

In 2025, the amendments to electricity tariffs for customers in tariff group G, approved by the President of URE on 28 June 2024, were in force for five default suppliers (PGE Obrót S.A., ENEA S.A., ENERGA – Obrót S.A., TAURON Sprzedaż sp. z o.o., TAURON Sprzedaż GZE sp. z o.o.) for the period until 31 December 2025. The President of URE refused to approve the tariff submitted by E.ON Polska S.A.

The companies TAURON Sprzedaż GZE sp. z o.o. and E.ON Polska S.A. are exempt from the obligation to submit tariffs for approval, in accordance with Article 49 para. 1 of the Energy Law Act; however, under the provisions of the amended Act of 7 October 2022, these companies were required to submit electricity tariffs for consumers in tariff groups G to the President of URE for approval.

Whilst the amended tariffs were in force, pursuant to the amendment to the Act on Extraordinary Measures, which came into force on 12 December 2024¹³, the application of the electricity price cap mechanism was extended until 30 September 2025. By the Act of 23 April 2025¹⁴ the provisions of the Act of 7 October 2022 were amended once again. Under the amended provisions, the period of validity of the revised tariffs was shortened to 30 September 2025.

Thus, energy trading companies supplying electricity to customers in tariff group G were required to submit further applications to the President of URE for approval of changes to the current tariffs by 31 July 2025, with the changes coming into effect on 1 October 2025.

All trading companies submitted the relevant applications to amend the current tariffs within the time limit prescribed by law.

¹³ Act of 27 November 2024 amending the Act on Emergency Measures to Limit Electricity Prices and Support for Certain Customers in 2023 and 2024 and Certain Other Acts (Journal of Laws of 2024, item 1831).

¹⁴ Act of 23 April 2025 amending the Act on Emergency Measures to Protect Customers of Electricity in 2023 and 2024 in connection with the Situation on the Electricity Market (Journal of Laws of 2025, item 565).

At the same time, the Act on Heating Voucher amended the provisions of the Act on Emergency Measures to extend, until 31 December 2025, the application of a maximum electricity price of 500 PLN/MWh for household customers.

Following administrative proceedings, on 30 September 2025 the President of URE approved changes to electricity tariffs for consumers in tariff group G for five default suppliers (PGE Obrót S.A., ENEA S.A., ENERGA – Obrót S.A., TAURON Sprzedaż sp. z o.o., TAURON Sprzedaż GZE sp. z o.o.), for the period from 1 October to 31 December 2025.

The average energy prices approved by the President of URE in the suppliers' tariff amendments were 8.1% lower than those approved on 28 June 2024 for the period until 31 December 2025; however, these prices did not apply directly to household customers. For this group of customers, a maximum electricity price of 500 PLN/MWh applied until 31 December 2025.

As regards E.ON Polska S.A., the administrative proceedings were once again concluded with the President of URE issuing a decision refusing to approve the electricity tariff set by that company. However, pursuant to the provisions on the application of a maximum price referred to above, a price of 500 PLN/MWh also applied to that company's customers.

At the end of October 2025, four default suppliers (PGE Obrót S.A., ENEA S.A., ENERGA – Obrót S.A., TAURON Sprzedaż sp. z o.o.) submitted applications for the approval of electricity tariffs for customers in tariff group G for 2026. However, the current legal regulations did not extend the obligation to submit applications to the President of URE for the approval of electricity tariffs – an obligation imposed by the provisions of the Act of 7 October 2022 – to electricity trading companies performing the duties of a default supplier in relation to customers in tariff group G, which had previously been exempt from this obligation, namely TAURON Sprzedaż GZE sp. z o.o. and E.ON Polska S.A..

Following administrative proceedings, on 17 December 2025 the President of URE approved electricity tariffs for customers in tariff group G for four default suppliers for a period ending on 31 December 2026. The approved average electricity prices under these tariffs are 13.5% lower than the average prices resulting from the amended tariffs approved on 30 September 2025 and in force until 31 December 2025 and 20.5% lower than the average prices resulting from the amended tariffs approved on 28 June 2024 and in force in 2025 from 1 January to 30 September.

3.1.4. Security and reliability regulation

Rules of network security and reliability

Pursuant to the Energy Law Act, energy enterprises engaged in the transmission and distribution of electricity to customers are obliged to:

- maintain the operability of equipment, installations and networks to supply fuel or energy in a continuous and reliable manner, while meeting applicable quality requirements, and
- provide all entities, on the basis of equal treatment, with transmission services consisting in the transmission of fuel or energy from a supplier of gaseous fuels, electricity or heat selected by these entities, under the terms and to the extent specified in the Act.

The provision of transmission services shall not compromise the reliability of electricity supply and the quality of such electricity below the level specified in separate regulations and shall not result in an adverse change in prices and the scope of supply of fuel or energy to other entities connected to the network. The above issues regulating the standards of energy supply to customers arise from supplementary provisions to the Act, contained in the Electricity System Ordinance, which in turn have been reflected in the transmission or distribution network codes of individual network operators. The transmission system operator and distribution system operators are obliged to develop a transmission

network code (TNC) or a distribution network code (DNC), respectively¹⁵. The aforementioned codes are subject to approval by the President of URE, and the methods, conditions, requirements and rules contained therein are binding for the network operators and the users connected to the network of these operators, and constitute a part of the contract for the provision of electricity transmission or distribution services.

The reliability of network operation (understood as the ability of the transmission or distribution network to deliver or receive capacity and electricity under specified conditions, place and time) is a derivative of power security, which is mainly determined by: the amount of capacity reserve in the power system and the competences and rights of system operators. System operators, each within their own area of operation, are responsible for power security on the electricity markets:

- on the system market – electricity TSO,
- on local markets – electricity DSOs.

Codes prepared for the electricity networks specify detailed conditions for the use of these networks by system users and the conditions and manner of operation, exploitation and development planning of these networks. They concern, among others, the requirements regarding the security of operation of the power grid and the conditions that must be met for its maintenance, as well as the indicators characterising the quality and reliability of electricity supply and the security of operation of the power grid. The quality parameters of electricity are specified in the electricity TNC.

Electricity storage facilities integrated into the grid of the electricity system operator

Article 36(1) of Directive 2019/944 provides that "Distribution system operators shall not own, develop, manage or operate energy storage facilities". Article 36(2) of that Directive allows Member States, by way of derogation from paragraph 1, to allow distribution system operators to own, develop, manage or operate energy storage facilities, where they are fully integrated network components and the regulatory authority has granted its approval¹⁶. These provisions have been implemented into the Energy Law Act in Article 9d¹ paras. 1-8 under Polish legislation.

The restrictions related to the disposal of energy storage facilities by electricity system operators arise from the assumption of the EU legislator which assumed the need to maintain competitiveness on the electricity market in an economically effective and non-discriminatory manner¹⁷. The regulations blocking electricity system operators' access to the use of energy storage facilities are intended to protect the electricity market against potential monopoly and to stimulate investment in the local energy sector, which is largely focused on renewable sources¹⁸. Therefore, the energy storage as a fully integrated component of the grid is to perform the functions and tasks of the grid, not the storage facility. According to the adopted regulations, electricity system operators should, as a rule, purchase warehouse services from external entities.

In 2025, the President of URE issued decisions recognising the energy storage facility as a fully integrated component of the network and agreed that the electricity system operator owns, develops, manages and operates it¹⁹. The decisions were issued at the request of TAURON Dystrybucja S.A., Energa Operator SA and „Dozamel” sp. z o.o. for a total of seven electricity storage facilities. They apply to four energy storage facilities with a capacity of up to 60 kW, which are to be connected to the low-voltage grid, and three storage facilities with a capacity of up to 2 MW, which are to be connected to the medium-voltage grid. The security of network operation is to be the sole purpose of operation of all these storage facilities, including ensuring continuity of power supply, quality parameters of electricity and technical local

¹⁵ This obligation does not apply to entities referred to in Article 9d para. 7 of the Energy Law Act.

¹⁶ Similarly, transmission system operators – Article 54 of Directive 2019/944.

¹⁷ Article 1 of Directive 2019/944.

¹⁸ See item 62 and 63 of the preamble of Directive 2019/944.

¹⁹ Pursuant to Article 9d¹ para. 2 of the Energy Law Act.

balancing²⁰. The installation of these energy storage facilities will also enable more efficient use of renewable sources and will allow to avoid investments related to the expansion of grid infrastructure.

In addition, in 2025, upon a request of a company, the President of URE issued three decisions declaring that the decisions recognising the energy storage facility as an integrated part of the grid had lapsed.

Congestion management

Approval of rules for access to the cross-border infrastructure, including the rules on capacity allocation and congestion management

The rules on capacity allocation and congestion management of interconnectors are governed by Regulation 2019/943 and Regulation 2015/1222 (on short-term allocation and congestion management) and Regulation 2016/1719 (on long-term allocation).

In 2025, transmission capacities were calculated and allocated separately for: the synchronous profile (covering interconnections with Germany, the Czech Republic and Slovakia), the DC interconnection with Sweden, the interconnection with Lithuania and the interconnections with Ukraine (Zamość-Dobrotwór radial interconnection and Rzeszów-Chmielnicka synchronous interconnection). On most of these connections, a calculation methodology based on net transfer capacity (NTC)²¹ was used, taking into account the balancing conditions:

- for the synchronous profile, NTC values were determined for import and export only for the purposes of the annual auction and monthly auctions (open auctions, explicit auctions),
- for the synchronous profile within the daily horizon, the Flow Based Approach (FBA) was used²²,
- for connections with Sweden and Lithuania, NTC values for exports and imports were determined for the purposes of daily auctions and as part of the intraday procedure (continuous trade),
- for the Zamość-Dobrotwór radial connection until October 2025 inclusive) and Mokre – Dobrotwór (as of November 2025), only NTC values for imports were determined for the purposes of monthly tenders,
- for the Rzeszów-Chmielnicka synchronous connection, NTC values for exports and imports were determined for the purposes of daily auctions.

Short-term capacity allocation at all NES borders with EU Member States was carried out under the pan-European single day-ahead coupling and single intraday coupling mechanisms (implicit auctions), in accordance with Regulation 2015/1222.

In the long-term horizon for the synchronous profile, the provision of cross-border capacity took place in accordance with the allocation rules for the long-term horizon approved by ACER Decision No. 18/2023 of 22 December 2023, as amended. The allocation was carried out as part of coordinated explicit tenders organised by the Auction Office Joint Allocation Office S.A. (JAO).

Transmission capacity on the Poland-Ukraine interconnection (Zamość-Dobrotwór) was allocated as part of explicit auctions organised in a monthly time horizon.

On the Rzeszów-Chmielnicka interconnection, the transmission capacity has been allocated since 18 January 2024 (the date of the first delivery) through coordinated auctions organised by the JAO Auction Office.

²⁰ See Article 3 item 11ba of the Energy Law Act.

²¹ Capacity calculation methodology based on the principle of estimating and defining ex ante the maximum exchange of energy between bordering bidding zones.

²² Capacity calculation methodology in which energy exchanges between bidding zones are limited by power spread factors and available margins on critical network components.

Revenues from transmission capacity allocation on interconnections with the EU states and their utilisation in 2025

The volume of revenues from the cross zonal capacity allocation on the interconnections with the EU member states in the period from 1 January to 31 December 2025 amounted to PLN 986,646,600. Under Regulation 2019/943, regulators are required to publish a detailed report on the use of congestion revenues. In fulfilment of the indicated obligation, the President of URE published the 2025 report on 27 February 2026²³.

System balancing services

The rules for the operation of the power system balancing mechanism (the so-called balancing market – BM) have been defined by the electricity TSO in the TNC and – as of April 2020 – in the Balancing Conditions (BC), developed on the basis of Article 18 of Regulation 2017/2195. Both the TNC and the BC are subject to approval by the President of URE.

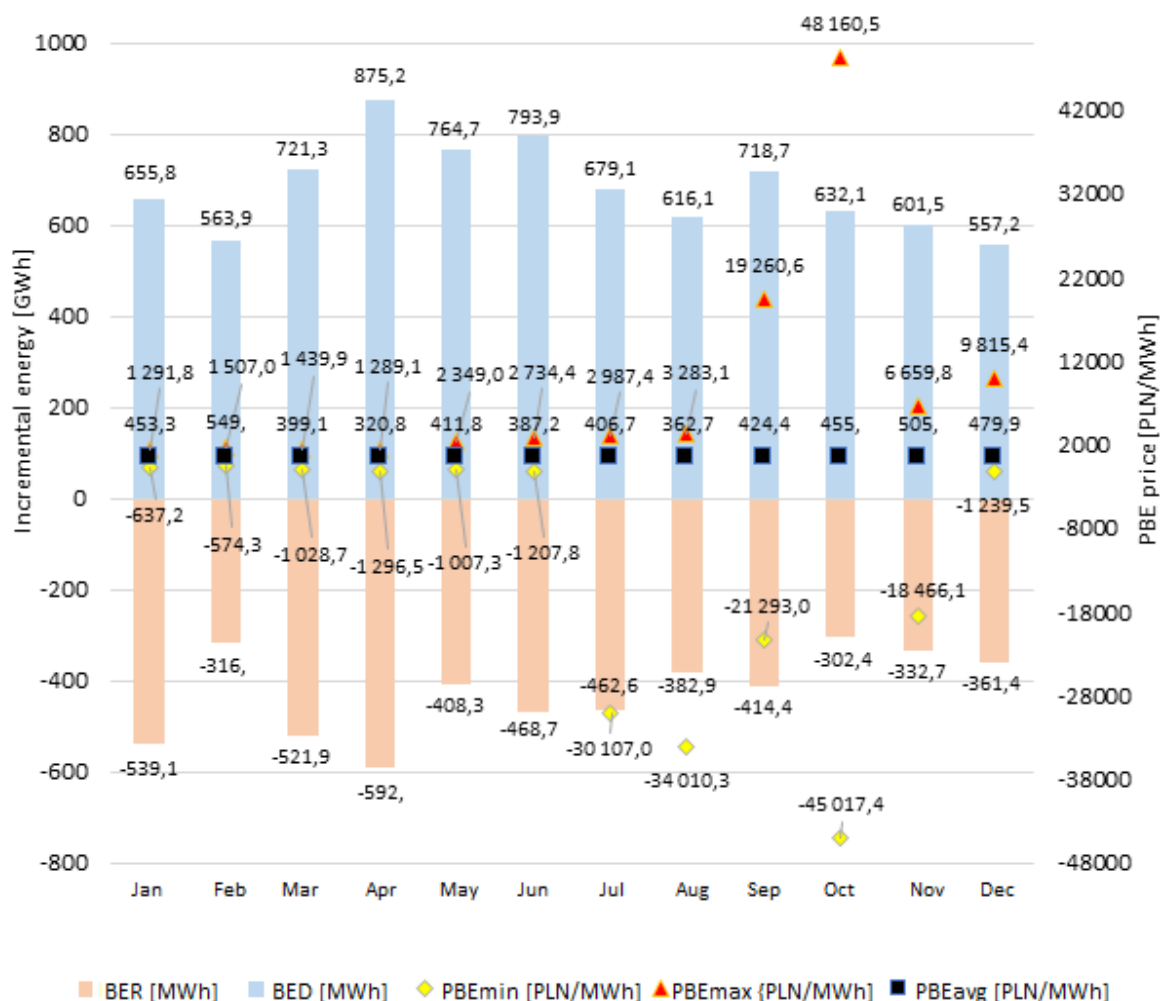
In 2025, the balancing market model implemented as part of the second balancing market reform in Poland was in operation. On 11 July 2025, PSE S.A., in fulfilment of its obligations under Article 21 and Article 22(6) of Regulation 2017/2195, joined the PICASSO platform (Platform for the International Coordination of Automated Frequency Restoration and Stable System Operation), which facilitates the exchange of balancing energy from the automatic frequency restoration reserve (aFRR) between transmission system operators participating in the platform.

As at 31 December 2025, 195 entities were participating in balancing market processes: 14 balancing service providers and 181 balance responsible parties, including 172 entities carrying out commercial balancing of resources, three operating an exchange or acting as an exchange clearing house or performing the functions of a NEMO/CCP NEMO, five acting as distribution system operators, and PSE S.A. as the electricity TSO. Technical and commercial data were reported by 49 market operators and related to 100 scheduling units and 266 balancing units.

The figure below presents information on the volume of balancing energy and energy prices on this market in particular months of 2025.

²³ <https://www.ure.gov.pl/download/9/16122/InformacjaPrezesaURE122026.pdf>

Figure 1. Prices of balancing energy (PBE) and balancing energy received from BM (UBER) and delivered to BM (UBED), in 2025

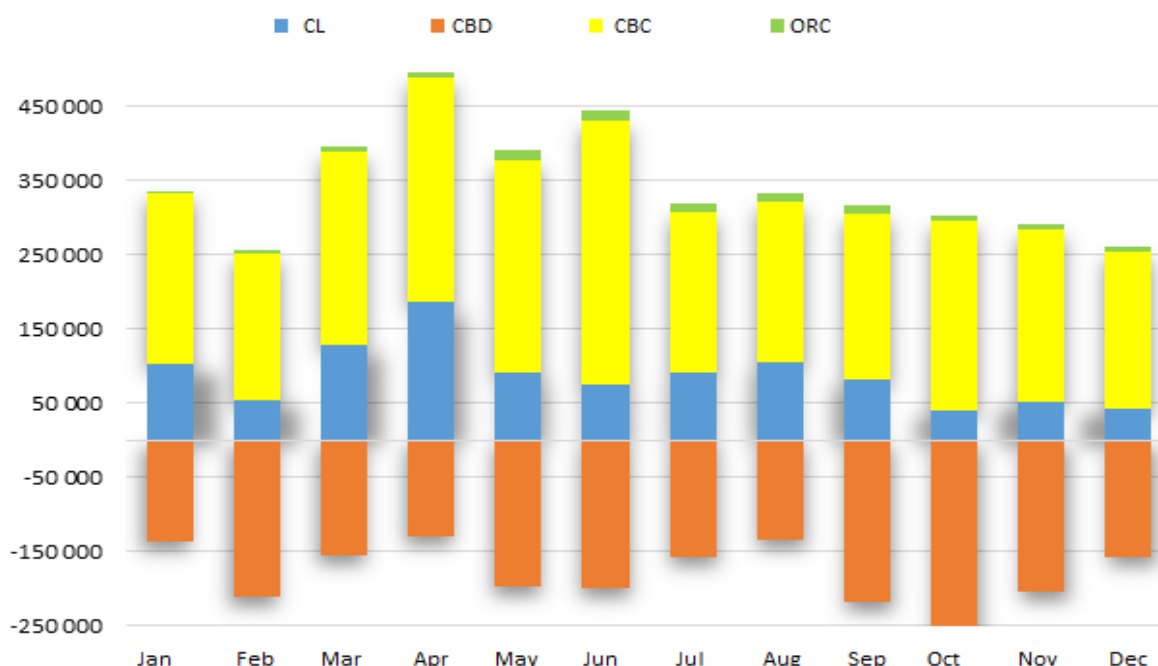


Source: URE on the basis of data acquired from PSE S.A.

For most hours of the year, there was an undercontracting of market participants (insufficient volume of energy contracted to be generated or purchased in relation to the demand of customers). The current status is unfavourable for the balancing of the power system. Following PSE S.A.'s joining the PICASSO platform, a significant increase in the volatility of maximum and minimum balancing energy prices was observed. This phenomenon was linked, among others, to integration with the European aFRR balancing energy market and exposure to prices set on the PICASSO platform. In response to the observed increased volatility in balancing energy prices following its integration with the PICASSO platform, on 3 December 2025 PSE S.A. launched consultations on a draft amendment to the BC concerning the introduction of a flexible balancing energy demand mechanism from the frequency restoration reserve with automatic activation. This amendment was approved by the President of URE on 23 February 2026.

The costs of limitations (CL) in 2025, determined in accordance with the definition of CL in the BC, amounted to PLN 1046.9 million. In addition, the figure shows data on: the costs of balancing customer demand, the costs of balancing capacity and the operating reserve costs.

Figure 2. Costs of balancing customer demand (CBD), costs of removing limitations (CL), costs of balancing capacities (CBC) and operating reserve costs (ORC) in 2025 [PLN thousand]



Source: URE on the basis of data acquired from PSE S.A.

Cybersecurity

In 2025, legislative work on the adoption of provisions enabling the application of Regulation 2024/1366 in the Polish legal system was continued, including the designation of the competent national authority responsible for carrying out the tasks entrusted to it under this Regulation. This work was completed in early 2026. On 2 March 2026, the Act of 23 January 2026 amending the Act on the National Cybersecurity System and Certain Other Acts was published²⁴, which came into force on 3 April 2026. Pursuant to Article 41 para. 1 of the amended Act on the National Cybersecurity System, the competent authority for cybersecurity matters in the energy sector is the minister responsible for energy.

Until the competent authority was entrusted with the tasks arising from Regulation 2024/1366, these tasks were carried out by the President of URE. As part of the competent authority's remit, in February 2025 the President of URE, pursuant to Article 48(3) of Regulation 2024/1366, identified candidates for high-impact and critical-impact entities in Poland – based on the recommended Provisional Electricity Cybersecurity Impact Index²⁵ developed by ENTSO-E in cooperation with EU DSO Entity.

In 2025, the President of URE processed, pursuant to Article 4(1) of EU Regulation 2024/1366, two applications submitted by PSE S.A. to the competent authority concerning the approval of documents entitled: "Cybersecurity risk assessment methodologies" and "Cyber-Attack Classification Scale Methodology". Following the appointment on 3 April 2026 of the minister responsible for energy as the authority responsible for carrying out the tasks of the competent authority under EU Regulation 2024/1366, these proceedings were transferred to the Minister for Energy.

²⁴ Journal of Laws of 2026 item 252.

²⁵ <https://eepublicdownloads.blob.core.windows.net/public-cdn-container/clean-documents/Network%20codes-%20documents/NCCS/Provisional%20ECII.pdf>

On 13 June 2025 ACER published the Cybersecurity Benchmarking Guide²⁶ pursuant to Article 13(1) of Regulation 2024/1366. Following its publication, the President of URE was able to commence work to fulfil the obligation set out in Article 13(2) of Regulation 2024/1366, namely to carry out a benchmarking analysis. In accordance with this provision, within 12 months of ACER establishing guidelines on the benchmarking analysis, national regulatory authorities shall carry out a benchmarking analysis to assess whether current investments in cybersecurity:

- a) mitigate risks having an impact on cross-border electricity flows,
- b) provide the desired results and engender efficiency gains for the development of the electricity systems,
- c) are efficient and integrated into the overall procurement of assets and services.

Following the publication of the guide, the President of URE began work on a benchmarking analysis by participating in the ACER cybersecurity task force. This work was not completed in 2025.

3.1.5. Monitoring the balance of supply and demand

Monitoring investment plans of energy companies in new generation capacity

Performing the tasks arising from the Energy Law Act with respect to monitoring the security of electricity supply, every two years the President of URE examines investment plans of electricity generators fulfilling the obligation to prepare 15-year forecasts²⁷. According to these provisions, an energy company generating electricity from sources with a total installed capacity of not less than 50 MW prepares and submits to the President of URE forecasts for a period of 15 years, covering in particular: the amount of electricity generated, undertakings for modernisation, expansion of existing sources or construction of new ones, as well as technical and economic data concerning the type and size of these sources, their location and the type of fuel used to generate electricity. The survey will be carried out using questionnaires drawn up by the URE, which will be sent to energy companies and corporate groups, as well as data from PSE S.A.

The next survey is due in 2026; consequently, it was not carried out during the reporting year.

Activities related to the capacity market

One form of support for electricity generators is the capacity market, introduced by the Capacity Market Act. The generation capacity mechanism, as a state aid scheme, was approved by a decision of the European Commission of 7 February 2018²⁸ and its purpose is to guarantee the security of the country's electricity supply, as the current electricity prices did not provide sufficient incentives to maintain existing generation capacity on the market or to invest in new capacity. This mechanism has been approved for 10 years; however, as contracts may be concluded for a maximum of 17 years, the contracts awarded under the successful capacity auction will remain in force until 2047. Under this measure, owners of generating units and energy storage facilities may receive additional revenue for their readiness to supply capacity to the electricity system, whilst entities providing demand reduction may receive payment for their readiness to reduce capacity consumption (demand side response – DSR).

²⁶ <https://www.acer.europa.eu/sites/default/files/documents/Other%20Documents/ACER-cybersecurity-benchmarking-guide-2025.pdf>

²⁷ Article 16 para. 21 of the Energy Law Act.

²⁸ https://ec.europa.eu/competition/state_aid/cases/272253/272253_1977790_162_2.pdf

Table 1. Funds paid to capacity providers for the performance of capacity contracts in 2021–2025²⁹

Year	Net payments [PLN million]
2021	5 328.1
2022	5 290.8
2023	5 469.1
2024	6 215.3
2025	7 613.9
Total	29 917.2

Source: URE's own analysis based on data provided by PSE S.A.

The contracting mechanism takes place through competitive Dutch auctions, meaning multi-round auctions with a descending price³⁰.

The detailed rules and organisation of the capacity market are set out in the Capacity Market Act and the Capacity Market Rules, which are approved by the President of URE at the request of PSE S.A., which acts as the operator in accordance with Article 2 para. 1 item 27 of the Capacity Market Act and is responsible for managing capacity market processes: certifications, auctions, etc.³¹

On 14 February 2025, an amendment to the Capacity Market Act came into force, implementing a derogation resulting from changes to EU legislation³² that allows generating units which commenced commercial production before 4 July 2019 and emit more than 550 g of CO₂ from fossil fuels per 1 kWh of electricity, to hold obligations or receive payments after 1 July 2025 under generation capacity mechanisms approved by the European Commission before 4 July 2019³³.

On 18 March 2025, another amendment to the Capacity Market Act came into force³⁴, introducing the possibility of holding catch-up auctions on the capacity market for the 2029 and 2030 delivery years. Catch-up auctions may be organised if an analysis carried out by electricity TSO of the impact of the main auction results on the security of electricity supply to final customers confirms a problem with the adequacy of generation capacity. The same entities are eligible to participate in catch-up auctions as in the main auction.

The parameters of the main auction, the catch-up auction and the supplementary auctions held in 2025 were laid down by the minister responsible for energy by way of an ordinance, following

²⁹ The data presented in the table are the sum of remuneration commissioned to be paid by Zarządca Rozliczeń S.A. to capacity providers, taking into account the annual indexation of the prices of capacity obligations in long-term contracts and bonuses paid for the supply of capacity in excess of the adjusted capacity obligation, reduced by remuneration refunds arising from the provisions of the Capacity Market Act (failure to make a demonstration, failure to meet the emission limit and correction of information being the basis for calculating the reduction of remuneration in connection with the support under aid schemes other than the capacity market) and refunds of bonuses due to failure to meet the emission limit.

³⁰ Owners of capacity market units that have been admitted to participate in the auction, following the successful completion of the general certification process and subsequently the certification process for the main auction, may withdraw their bid if the price in the next round no longer guarantees the capacity remuneration they expect. The auction ends in the round in which the remaining volume of offered capacity equals the demand for capacity in the auction in question, as announced in an ordinance of the minister responsible for energy, determined after consultation with the President of URE and issued pursuant to Article 34 of the Capacity Market Act.

³¹ PSE Capacity Market Rules – <https://www.pse.pl/regulamin-rynku-mocy>

³² EMD Regulation.

³³ The Act introduced the possibility of holding supplementary auctions on the capacity market, in which, in addition to entities participating in the main and additional auctions, generating units that do not meet the CO₂ emission limit of 550 g/kWh of electricity generated will be able to participate. Under the Act, four supplementary auctions may be held for the following delivery periods: the second half of 2025 (a semi-annual auction) and for the delivery years 2026, 2027 and 2028 (annual auctions). These will be held if, for a given delivery year, a problem with the adequacy of generation capacity identified following the main auction and supplementary auctions remains unresolved, and this fact is confirmed in an assessment of the adequacy of generation capacity at the national level carried out by TSO.

³⁴ Act of 21 February 2025.

consultation with the President of URE³⁵. The parameters of the supplementary auctions, on the other hand, were published in the Official Journal of the Republic of Poland, "Monitor Polski"³⁶.

Therefore, following an analysis of the parameters proposed by electricity TSO, the President of URE questioned the level of capacity demand for the catch-up auction for 2029 and the main auction for 2030. The President of URE indicated that this figure was excessive due to overly restrictive assumptions regarding the planned decommissioning of conventional generating units. Furthermore, in the opinion submitted to the Minister for Climate and the Environment, the President of URE highlighted the excessive year-on-year increase in the market entry price for a new generating unit, which determines the maximum price applicable in the main auction. The President of URE emphasised that both the capacity demand and the maximum price in the main auction should be set at levels which, on the one hand, provide incentives for potential investors to build new generation sources, but, on the other hand, do not cause an excessive increase in the already high costs borne by energy customers due to the capacity market. In addition, the regulatory authority drew attention to a further significant reduction in the corrective availability factor for electricity storage facilities (in the form of batteries, kinetic energy storage systems and supercapacitors) compared with the level of this parameter for the years 2028–2029. In the opinion of the President of URE, it would be appropriate to set different values for this factor for electricity storage facilities with different maximum capacity delivery times. However, these proposals were not taken into account.

The execution of the capacity market processes in 2025 progressed on schedule and without disruption. The following auctions took place in 2025:

- 27 March – four additional auctions for supplies in each quarter of 2026,
- 15 May – a supplementary auction for the second half of 2025,
- 17 July – a catch-up auction for 2029,
- 11 September – a supplementary auction for 2026,
- 11 December – the main auction for the 2030 delivery year.

The volume of capacity obligations offered by capacity providers in the main auction for the 2030 delivery year amounted to 9,083 MW and was approximately 31% higher than the capacity demand, which stood at 6,913 MW. The auction concluded in the second round with a clearing price of 465.02 PLN/kW/year, approximately 21% lower than the maximum price (588 PLN/kW/year).

The capacity volume offered in the catch-up auction for 2029 amounted to 5,110 MW and was virtually equal to the capacity demand, which stood at 5,236 MW. Consequently, the auction concluded in round 1 with a clearing price of 534.09 PLN/kW/year, slightly below the maximum price (537 PLN/kW/year).

In fulfilling the obligations arising from the Capacity Market Act and the Act on Heating Voucher, the President of URE in 2025:

- announced the final results of the main auction for the delivery year 2029³⁷,
- announced the final results of the additional auctions for each quarter of the 2026 delivery year³⁸,
- submitted a request to the Minister of Climate and Environment regarding the volume of demand for capacity in the catch-up auction for the delivery year 2029,
- gave its opinion to the Minister of Climate and Environment on capacity demand in the supplementary auction for the delivery period from 1 July to 31 December 2025,

³⁵ Article 34 para. 1 and Article 39a para. 4 of the Capacity Market Act.

³⁶ Article 3 para. 2 of the Act of 24 January 2025 amending the Capacity Market Act (Journal of Laws of 2025 item 159) and Article 34b para. 2 of the Capacity Market Act.

³⁷ Information of the President of URE no. 2/2025, <https://www.ure.gov.pl/pl/energia-elektryczna/rynek-mocy/informacje/12377,Informacja-nr-22025.html>

³⁸ Information of the President of URE no. 22/2025, <https://www.ure.gov.pl/pl/energia-elektryczna/rynek-mocy/informacje/12613,Informacja-nr-222025.html>

- gave its opinion to the Minister of Climate and Environment on capacity demand in the supplementary auction for the delivery year 2026,
- published information on the capacity fee rates for the period from 1 July to 31 December 2025³⁹,
- announced the final results of the supplementary auction for the period from 1 July to 31 December 2025⁴⁰,
- submitted a request to the Minister of Climate and Environment regarding the volume of demand for capacity in the main auction for the delivery year 2030 and in additional auctions for the delivery year 2027,
- gave its opinion to the Minister of Climate and Environment on the parameters of the main auction for the delivery year 2030 and the parameters of the additional auctions for the delivery year 2027,
- announced the final results of the supplementary auction for the delivery year 2026⁴¹,
- indicated selected hours of the day falling within the hours of peak demand for capacity in the system determined separately for the quarters of the delivery year 2026⁴²,
- calculated the capacity fee rates for 2026⁴³,
- calculated the unit rate of the penalty for non-compliance with the capacity obligation applicable in 2026⁴⁴.

In accordance with the requirements of the Capacity Market Act, the President of URE received from electricity TSO information on:

a) the course of the following certifications:

- general certification in 2025;
- for additional auctions for the delivery year 2026;
- for supplementary auctions for the delivery period from 1 July to 31 December 2025 and for the delivery year 2026;
- for a catch-up auction for the delivery year 2029;
- for the main auction for the delivery year 2030,

b) the course of the following auctions:

- additional auctions for the delivery year 2026;
- supplementary auctions for the delivery period from 1 July to 31 December 2025 and for the delivery year 2026;
- a catch-up auction for the delivery year 2029;
- the main auction for the delivery year 2030,

c) total costs of the capacity market for 2026.

In addition, in fulfilment of the obligation set out in the Act on Heat Voucher:

- electricity TSO provided the President of URE with information on the total costs of the capacity market in 2026,
- Zarządca Rozliczeń S.A. provided the President of URE with:

³⁹ Information of the President of URE no. 26/2025, <https://www.ure.gov.pl/pl/energia-elektryczna/rynek-mocy/informacje/12700,Informacja-nr-262025.html>

⁴⁰ Information of the President of URE no. 27/2025, <https://www.ure.gov.pl/pl/energia-elektryczna/rynek-mocy/informacje/12698,Informacja-nr-272025.html>

⁴¹ Information of the President of URE no. 55/2025, <https://www.ure.gov.pl/pl/energia-elektryczna/rynek-mocy/informacje/12894,Informacja-nr-552025.html>

⁴² Information of the President of URE no. 57/2025, <https://www.ure.gov.pl/pl/energia-elektryczna/rynek-mocy/informacje/12931,Informacja-nr-572025.html>

⁴³ Information of the President of URE no. 58/2025, <https://www.ure.gov.pl/pl/energia-elektryczna/rynek-mocy/informacje/12932,Informacja-nr-582025.html>

⁴⁴ Information of the President of URE no. 71/2025, <https://www.ure.gov.pl/pl/energia-elektryczna/rynek-mocy/informacje/13018,Informacja-nr-712025.html>

- information on expenditure and costs relating to debt incurred and justified costs arising from operations in 2026;
- the projected cash balance of the capacity charge account as at 31 December 2025.

The above information served as the basis for the President of URE to calculate the capacity charge rates for 2026.

In 2025, the President of URE approved the following amendments to the Capacity Market Rules⁴⁵:

- The decision of 6 March 2025 amended the content of the application for entry in the register by removing the requirement to:
 - submit a work plan covering the next five years in the case of physical generating units;
 - submit information regarding the intention to register a given physical generating unit to participate in the next main auction or in supplementary auctions, or a declaration of non-participation;
 - specify the year of supply to which the main auction will relate in the case of a planned physical generating unit,
- The decision of 24 March 2025 introduced:
 - amendments aligning the Rules with the amendments to the Capacity Market Act⁴⁶;
 - clarified the provisions relating to the processes for the return of security deposits to demand reduction units, the cancellation of certificates in the event of failure to meet a financial milestone or an operational milestone, and the provision of revised information on the amount of the bonus paid to capacity providers,
- The decision of 8 May 2025 introduced amendments to adjust the Rules to the amendments to the Capacity Market Act⁴⁷ which introduced a new type of capacity auction in the form of a catch-up auction:
 - regulations governing the conduct and timelines of processes involving capacity market units consisting of foreign physical units;
 - a change to the deadline for submitting an application to replace a planned demand reduction unit;
 - the introduction of procedures for confirming, with the relevant entity, the volume of energy covered by a support scheme other than the capacity market,
- The decision of 3 December 2025 introduced amendments aimed at clarifying the provisions of the Rules with regard to:
 - the availability of metering data in the capacity market register;
 - the content of an independent expert report;
 - the application for certification of a demand response capacity market unit;
 - the process of establishing security;
 - modifications to the process of submitting declarations regarding the emission limit after a delivery year,
- The decision of 31 December 2025 introduced:
 - a possibility of taking into account a planned application for the determination of grid connection conditions as one of the grounds for recognising a unit as a planned physical generating unit;
 - a restriction on the scope of the required verification of an application for entry in the register by the electricity DSO, by excluding planned physical generating units from this process.

⁴⁵ Capacity Market Rules, <https://bip.ure.gov.pl/bip/rynek-mocy/3674,Regulamin-rynku-mocy.html>

⁴⁶ Act of 24 January 2025 amending the Capacity Market Act (Journal of Laws item 159).

⁴⁷ Act of 21 February 2025.

Following the main auctions for 2021–2030 and the catch-up auction for 2029, contracts were concluded on the capacity market under which the construction of new generating units and energy storage facilities with a capacity of approximately 18.9 GW will be financed, of which 12.5 GW are units for which decisions to launch the investment were taken after the capacity market was implemented.

During the same period, contracts were signed under which approximately 16 GW of generation capacity will be modernised.

In addition, 10.9 GW has been contracted from demand response service providers.

The above data show that the introduction of the capacity payment mechanism has improved the security of electricity supply by:

- enabling the financing of the modernisation of existing sources and the construction of new ones,
- increasing the capacity to connect renewable energy sources to the National Electricity System,
- supporting the development of energy storage technologies,
- creating new opportunities for the provision of DSR services.

Detailed figures relating to the operation of the capacity market in 2025 are presented below.

Table 2. Additional auction data for all quarters of the delivery year 2026 (the auctions were held on 27 March 2025)

Quarter of delivery year 2025	Number of successful bids in the additional auction	Total volume of capacity obligations arising from the concluded capacity contracts for a given delivery quarter [MW]	Clearing price [PLN/kW/year]
I	98	2 022.723	388.05
II	10	87.524	37.24
III	10	93.524	37.25
IV	115	2 387.759	487.00

Source: URE.

Table 3. Data relating to the supplementary and catch-up auctions for the delivery period from 1 July to 31 December 2025 (the auction was held on 15 May 2025)

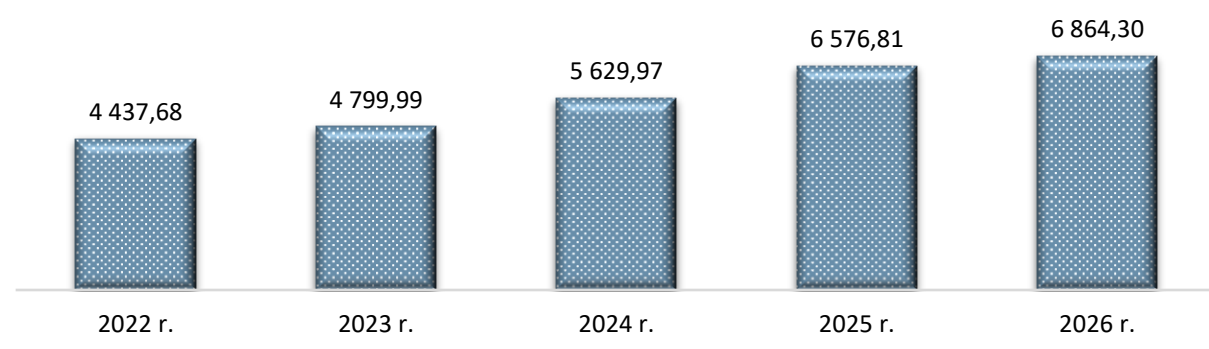
Auction	Number of successful bids in the supplementary auction	Total volume of capacity obligations arising from the concluded contracts [MW]	Clearing price [PLN/kW/year]
Supplementary auction for the delivery period from 1 July to 31 December 2025 (the auction was held on 15 May 2025)	73	5 050.856	431.00
Catch-up auction for the delivery year 2029 (the auction was held on 17 July 2025)	53	4 513.048	534.09
Supplementary auction for the delivery year 2026 (the auction was held on 11 September 2025)	58	7 580.436	346.37

Source: URE.

Table 4. Data relating to the main auction for the delivery year 2030 (the auction was held on 11 December 2025)

Location of units	Number of successful bids in the main auction	Total volume of capacity obligations arising from the concluded capacity contracts for a given delivery year [MW]	Clearing price [PLN/kW/year]
Polish units	165	5 895.639	465.02
Foreign units in total	33	992.000	
including:			
<i>Synchronous profile zone</i>	9	668.000	78.00
<i>Transmission system of the Republic of Lithuania</i>	6	148.000	418.00
<i>Transmission system of the Kingdom of Sweden</i>	18	176.000	444.67
TOTAL	198	6 887.639	465.02

Source: URE.

Figure 3. A comparison of the unit penalty rates for failure to fulfil the capacity obligation in the years 2022–2026 [PLN/MWh]

Source: URE.

Other activities in the area of the capacity market

ERAA

Similarly to previous years, representatives of the President of URE participated in works on an European Resources Adequacy Assessment, whose purpose is to provide a coherent and comparable basis for identifying problems with the availability of capacity in the electricity systems of European transmission system operators. This assessment is carried out for parallel scenarios (with and without capacity markets) and covers a horizon of 10 consecutive years. It allows for the identification of long-term, structural problems in ensuring coverage of electricity demand and additionally provides information on the need for capacity markets within the EU. The European resource adequacy assessment shall be carried out annually by ENTSO-E and submitted to ACER for approval.

ERAA 2024

The European Resources Adequacy Assessment 2024 (ERAA 2024)⁴⁸ was approved by ACER Decision no. 07/2025⁴⁹ of 11 August 2025.

⁴⁸ <https://www.entsoe.eu/eraa/2024/>

⁴⁹ <https://www.acer.europa.eu/sites/default/files/documents/Individual%20Decisions/ACER-Decision-07-2025-ERAA-2024.pdf>

The Agency, in cooperation with the regulatory authorities of the Member States, assessed the ERAA 2024 in terms of its compliance with the requirements of Regulation 2019/943 and the methodology for assessing resources adequacy at the European level, approved by ACER Decision 24/2020⁵⁰. Although the ERAA 2024 analysis was performed on the basis of a number of methodological simplifications, in ACER's view its results accurately identify problems with resource adequacy and may therefore serve as an objective basis for assessing resource adequacy in accordance with the requirements of Regulation 2019/943.

However, it was considered that four elements of the analysis submitted by ENSTO-E required correction, so that the ERAA 2024 were accurate and compliant with the regulatory framework:

- ERAA 2024 should be supplemented with results for Italy and Malta for the year 2026 to ensure compliance with the geographical scope required by Regulation 2019/943,
- the analysis should be supplemented with information explaining the functioning and implementation of the assessment of the impact of curtailment sharing between Member States,
- the results of the two additional scenarios concerning the availability of French nuclear power stations should be excluded from the analysis, leaving only the reference scenario,
- the analysis should be supplemented with detailed data on emergency situations in each Member State.

In view of the above, the aforementioned ACER decision concludes that the ERAA 2024 is approved, subject to the aforementioned amendments⁵¹.

ERAA 2025

The ERAA 2025 proposal was published by ENTSO-E in December 2025. The Agency, in cooperation with the regulatory authorities of the Member States, assessed the ERAA 2025 in terms of its compliance with the requirements of Regulation 2019/943 and the methodology for assessing resource adequacy at the European level. In ACER's assessment, the submitted proposal requires adjustments and additions. As was the case with the ERAA 2024, ACER intends to approve the analysis as amended by it.

3.1.6. Cross-border issues

Monitoring technical cooperation between the EU and third country operators

In 2025, the technical capacity for interconnection exchange was calculated separately for: the synchronous profile of Germany, the Czech Republic and Slovakia; the direct current interconnection with Sweden; the interconnection with Lithuania (operating synchronously as of 9 February 2025); the 220 kV Zamość-Dobrotwór (Ukraine) radial line and the Rzeszów-Chmielnicka (Ukraine) synchronous interconnection.

The applicable rules for capacity calculation, allocation and congestion management are described in Chapter 3.1.4. in the part: "Approval of the rules for access to cross-border infrastructure, including capacity allocation and congestion management".

Under the terms of the contracts concluded, PSE S.A. has at its disposal bilateral and multilateral inter-operator remedial measures, which can be divided into:

- 1) remedial measures used when there is a risk of failing to maintain the capacity balance in the electricity system,
- 2) remedial measures for resolving grid problems.

⁵⁰ https://www.acer.europa.eu/sites/default/files/documents/Individual%20Decisions/ACER%20Decision%2024-2020%20on%20ERAA_1.pdf

⁵¹ The amendments are set out in Annexes I.a–I.g and Annex II to ACER Decision No 07/2025 of 11 August 2025.

The remedial measures applied in situations where the capacity balance of the electricity system is at risk include emergency assistance provided under bilateral contracts (PSE S.A. has concluded such contracts with all neighbouring transmission system operators), as well as emergency assistance from a third operator using the neighbouring operator's system as a transit route, under multilateral contracts (PSE S.A. has concluded a contract with the Hungarian operator involving transit through Slovakia).

Emergency assistance is an extraordinary measure designed to restore safe operating conditions for a given system, both in the event of a capacity shortage and in the event of a forecast surplus – in both cases, after taking market transactions into account.

This measure involves the emergency purchase from – or sale to – another operator of the required volume of capacity. The duration of the supply and the volume of capacity are determined by dispatchers, depending on the capabilities of the assisting operator and the available transmission capacity.

Remedial measures for resolving network issues include redispatching and countertrading, which operate under bilateral contracts (redispatching also operates under a multilateral contract), as well as DC loop flow, which operates under a multilateral contract.

The above measures are also emergency measures designed to reduce flows through both border and internal network elements, as specified in the relevant contracts, when the n-1 criterion is forecast to be breached at those elements.

Redispatching and countertrading consist in simultaneously reducing generation in one system and increasing generation in another, so as to reduce flows from the first system to the second. The difference is that redispatching applies to alternating current interconnections, whilst countertrading takes place between areas connected by direct current interconnections.

Redispatching is provided for in the contracts with 50Hertz Transmission GmbH and ČEPS, a.s., whilst countertrading is provided for in the contract with Svenska kraftnät and – until synchronisation – was included in the contract with Litgrid.

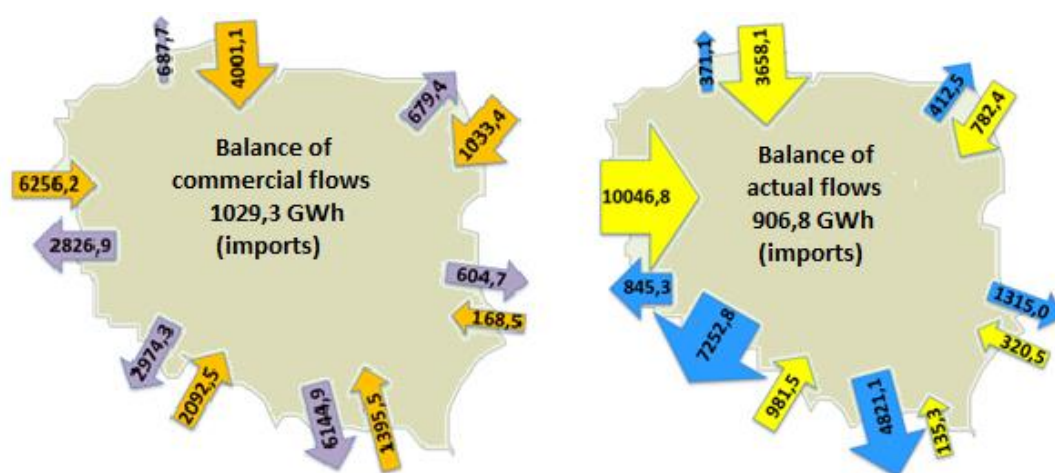
Multilateral redispatching consists in simultaneously reducing and increasing generation in two different systems, but with the aim of reducing flows at the border of a third system, which is not necessarily adjacent to the first and second systems.

DC loop flow enables simultaneous adjustments to schedules on direct current interconnections between the Continental Europe zone (which comprises the Polish, German and western parts of the Danish systems) and the Nordic zone (which comprises the Swedish system and the eastern part of the Danish system), and consequently to adjust flows on cross-border interconnectors between the parties to the contract in a closed loop. The implementation of DC loop flow helps to reduce congestion on the synchronous interconnectors between Poland and Germany or Denmark and Sweden.

Coordinated interconnection exchange

The trade balance of electricity interconnection and the actual energy flows from particular countries to Poland and from Poland to other countries in 2025 are presented below.

Figure 4. Balance of commercial and actual electricity flows at interconnections with other countries in 2025 [GWh]

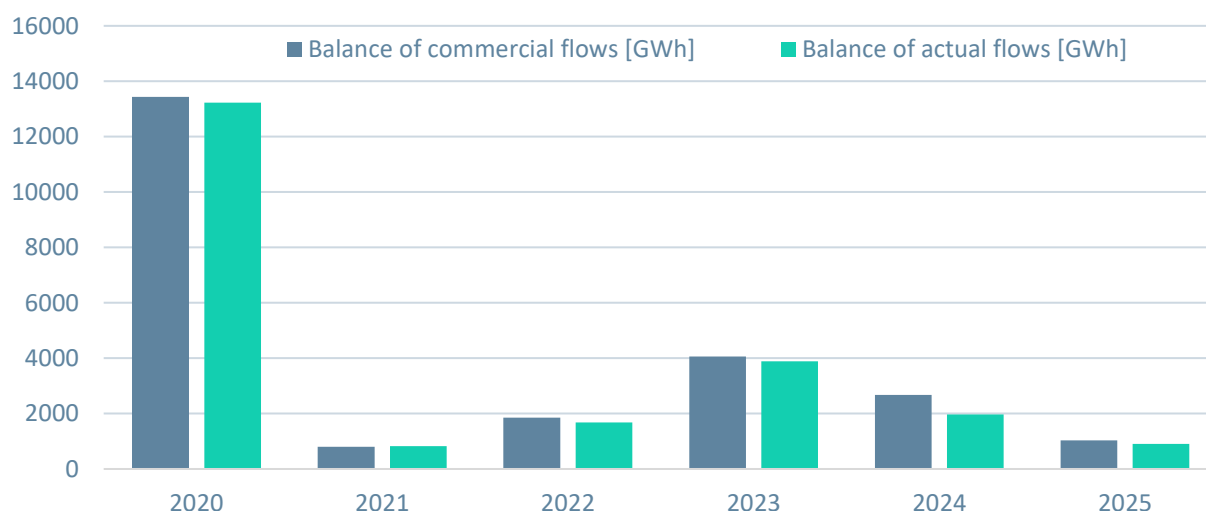


Source: URE's analysis on the basis of data provided by PSE S.A.

A comparison of commercial flow balances and actual electricity flow balances on interconnections with other countries

The electricity commercial balance – the balance at Poland's borders in 2025 – stood at 1,029.3 GWh (imports). Electricity exports in 2025 totalled 13,917.9 GWh, an increase of 18% compared with the previous year. Electricity imports totalled 14,947.2 GWh, an increase of 3.5% compared with 2024.

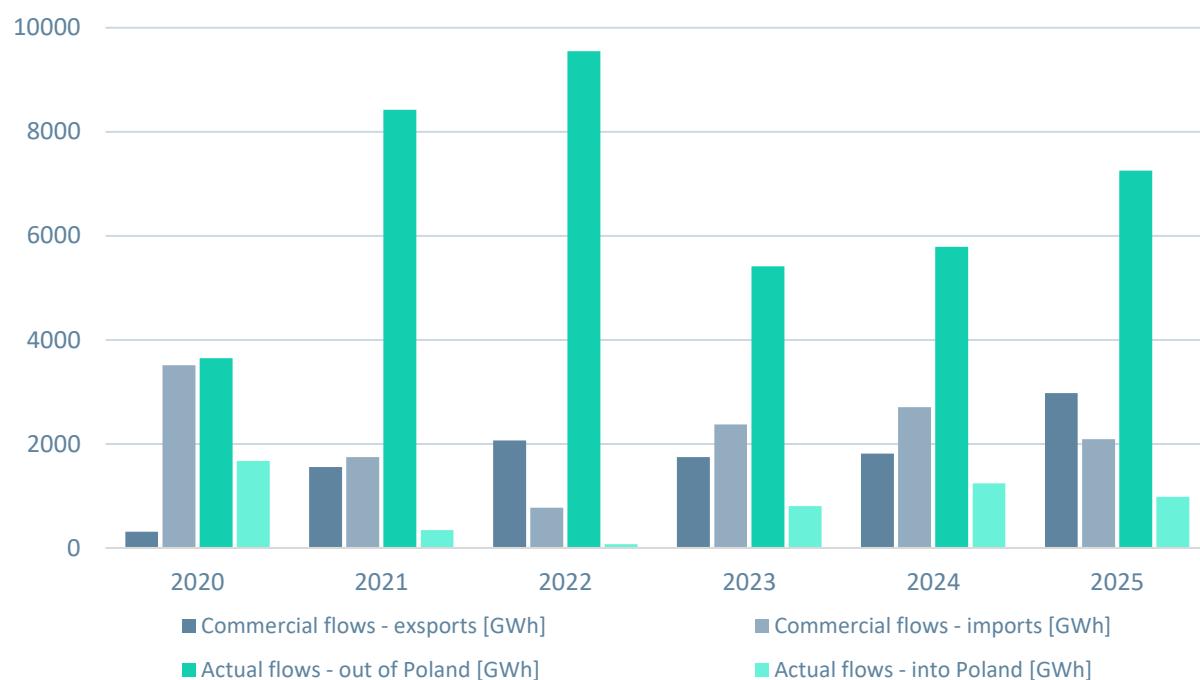
Figure 5. Comparison of commercial and actual electricity flows at interconnections with other countries (total) in 2020–2025 [GWh]



Source: URE's analysis on the basis of data provided by PSE S.A.

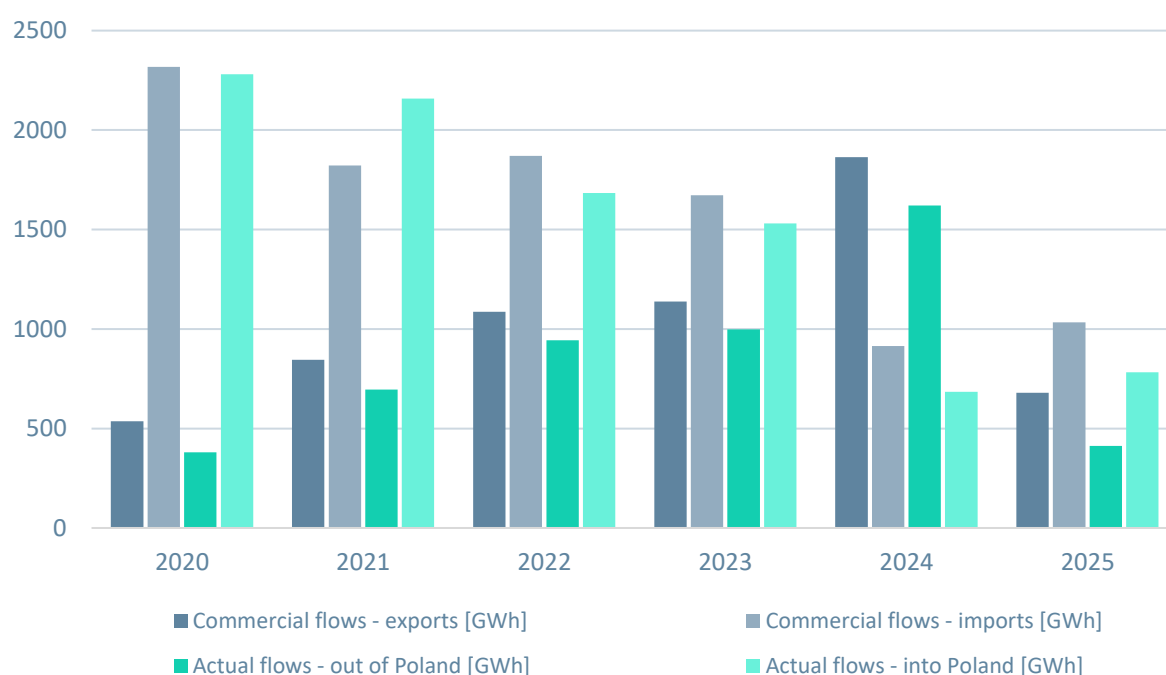
The figures below present a comparison of data on commercial flows (separately for imports and exports) and actual flows (separately for electricity flowing out of Poland and for electricity flowing into Poland) broken down into individual connections with neighbouring countries, that is with the Czech Republic, Lithuania, Germany, Slovakia, Sweden and Ukraine.

Figure 6. Comparison of commercial and actual electricity flows at the Polish-Czech interconnection in 2020–2025 [GWh]



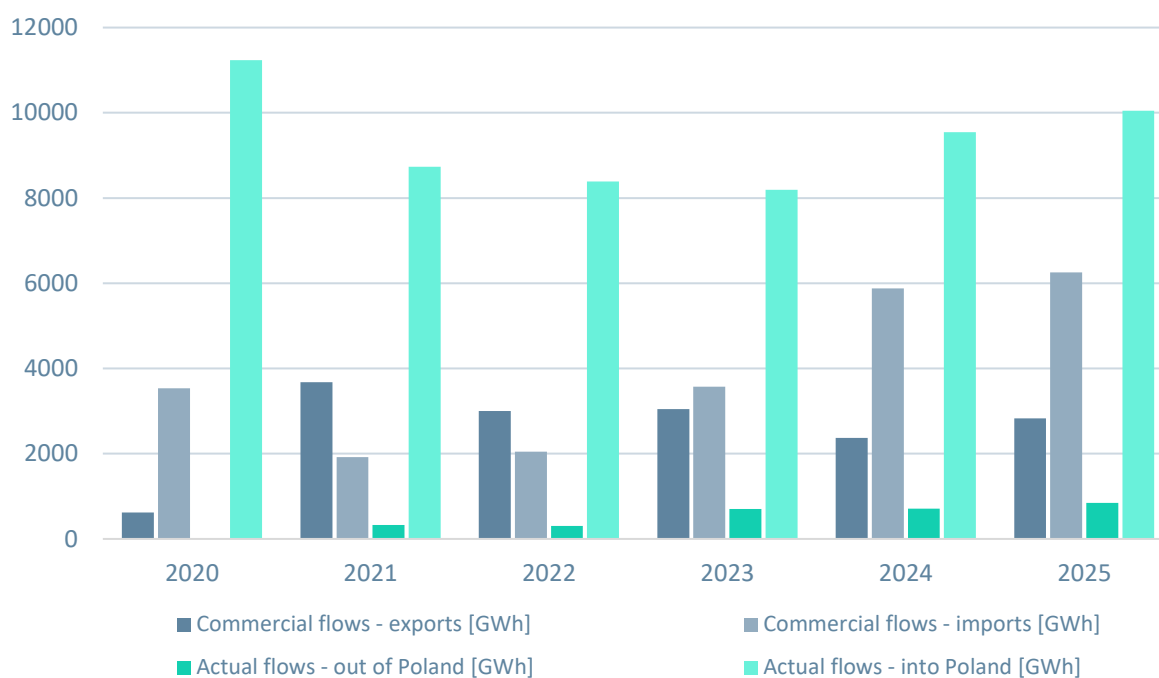
Source: URE's analysis on the basis of data provided by PSE S.A.

Figure 7. Comparison of commercial and actual electricity flows at the Polish-Lithuanian interconnection in 2020–2025 [GWh]



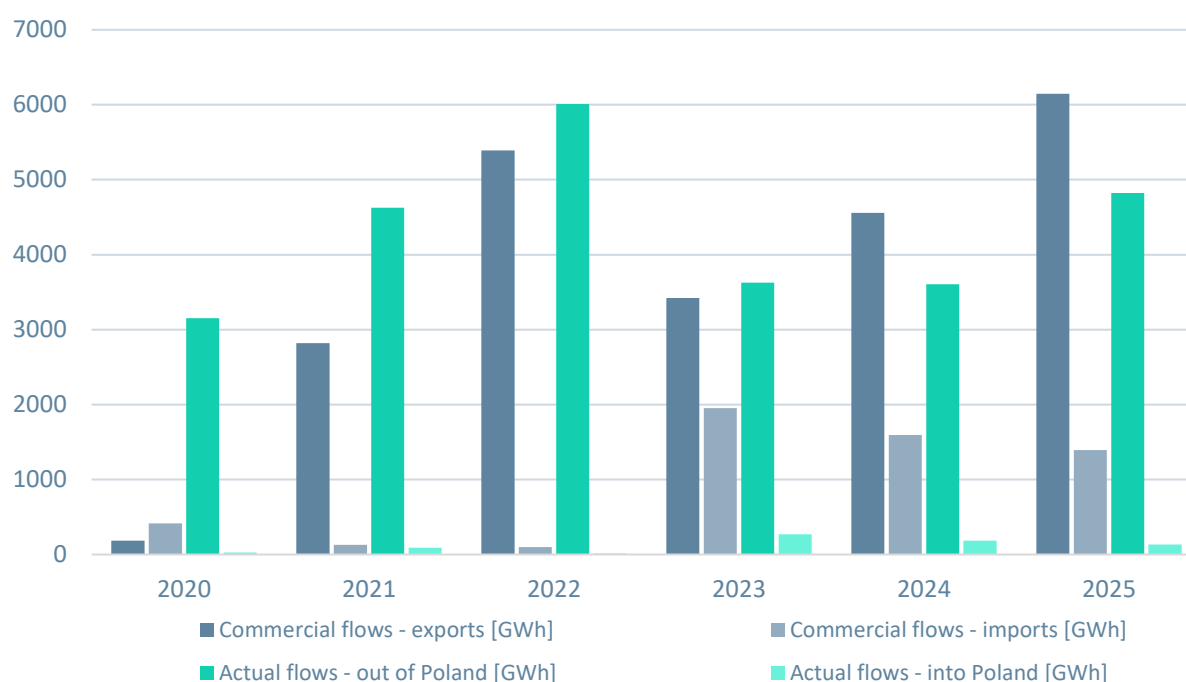
Source: URE's analysis on the basis of data provided by PSE S.A.

Figure 8. Comparison of commercial and actual electricity flows at the Polish-Germany interconnections in 2020–2025 [GWh]



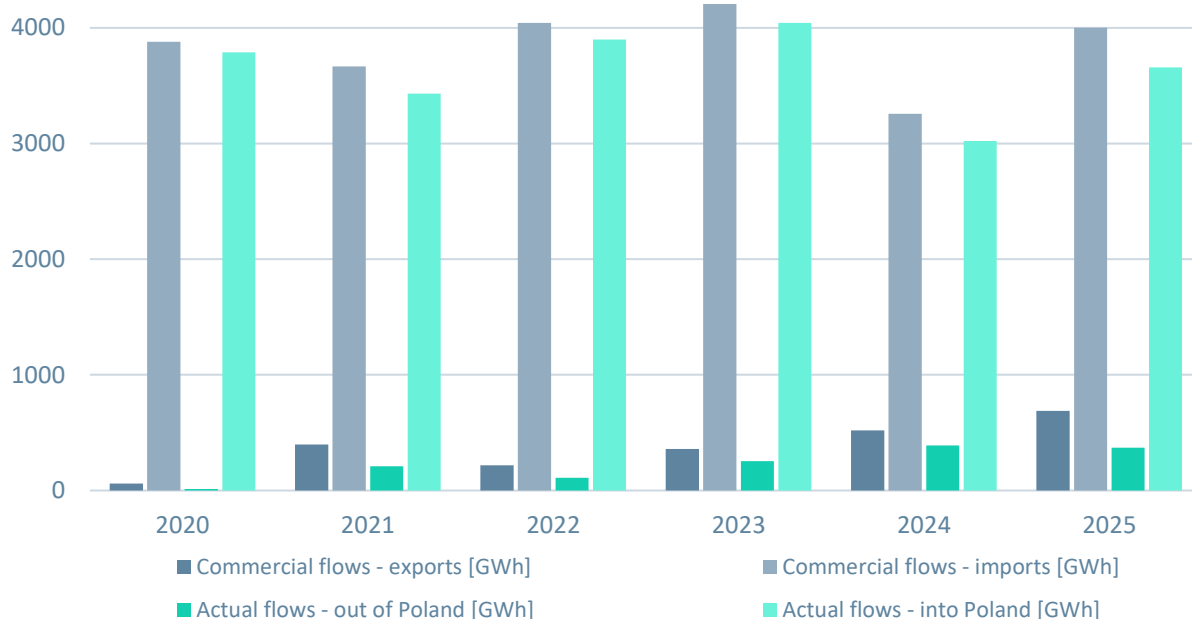
Source: URE's analysis on the basis of data provided by PSE S.A.

Figure 9. Comparison of commercial and actual electricity flows at the Polish-Slovakian interconnection in 2020–2025 [GWh]



Source: URE's analysis on the basis of data provided by PSE S.A.

Figure 10. Comparison of commercial and actual electricity flows at the Polish-Swedish interconnection in 2020–2025 [GWh]



Source: URE's analysis on the basis of data provided by PSE S.A.

Figure 11. Comparison of commercial and actual electricity flows at the Polish-Ukraine interconnection (for imports only and for energy outgoing from Poland) in 2020–2025 [GWh]



Source: URE's analysis on the basis of data provided by PSE S.A.

When comparing import commercial flows and actual flows on interconnections with Ukraine, it is noteworthy that there is a large difference between commercial flows and actual flows, which did not occur before 2023. As for the reasons for the above phenomenon, it should be indicated that in May 2023, a 400 kV synchronous connection Rzeszów-Chmielnicka was launched, on which circular flows occur in both directions, mainly via Slovakia and to a lesser extent via the Czech Republic, so there are similar dependencies as on the other synchronous connections.

At the same time, attention should be drawn to the significant difference between commercial and actual electricity flows at synchronous borders (Germany, the Czech Republic, Slovakia), which has persisted for many years, and is due to unscheduled electricity flows, contributing to the reduction of transmission capacity offered to participants at these borders.

Monitoring the limitations of transmission services in cross-border exchange due to lack of capacity or grid failures in 2025

In 2025, there were no reductions in allocated transmission capacity in cross-border exchange.

3.1.7. Implementation of guidelines and network codes

Table 5. Applicable European Commission regulations concerning the development of a single electricity market

Name of network code / guidelines	Published in
Commission Regulation (EU) 2015/1222 of 24 July 2015 establishing a guideline on capacity allocation and congestion management	EU OJ L 197, 25.07.2015, p. 24 as amended
Commission Regulation (EU) 2016/1388 of 17 August 2016 establishing a network code on demand connection	EU OJ L 223, 18.08.2016, p. 10
Commission Regulation (EU) 2016/631 of 14 April 2016 establishing a network code on requirements for grid connection of generators	EU OJ L 112, 27.04.2016, p. 1, as amended
Commission Regulation (EU) 2016/1447 of 26 August 2016 establishing a network code on requirements for grid connection of high-voltage direct current systems and direct current-connected power park modules	EU OJ L 241, 8.9.2016, p. 1
Commission Regulation (EU) 2016/1719 of 26 September 2016 establishing a guideline on forward capacity allocation	EU OJ L 259 of 27.09.2016, p. 42, as amended
Commission Regulation (EU) 2017/1485 of 2 August 2017 establishing a guideline on electricity transmission system operation	EU OJ L 220, 25.08.2017, p. 1, as amended
Commission Regulation (EU) 2017/2195 of 23 November 2017 establishing a guideline on electricity balancing	EU OJ L 312 of 28.11.2017, p. 6, as amended
Regulation (EU) 2019/941 of the European Parliament and of the Council of 5 June 2019 on risk-preparedness in the electricity sector and repealing Directive 2005/89/EC	EU OJ L 158, 14.06.2019, p. 1
Regulation (EU) 2019/942 of the European Parliament and of the Council of 5 June 2019 on the internal market for electricity	EU OJ L 158, 14.06.2019, p. 54, as amended
Regulation (EU) 2019/943 of the European Parliament and of the Council of 5 June 2019 establishing a European Union Agency for the Cooperation of Energy Regulators	EU OJ L 158, 14.06.2019, p. 22, as amended

Source: URE.

In accordance with the provisions of the legal acts listed in Table 5, the regulatory authorities of the EU Member States are responsible for approving the conditions and methods specified therein. These methods can be divided into European, regional and national methods and are developed by nominated electricity market operators, ENTSO-E and the transmission system operators concerned, that is national methods by relevant national transmission system operators, regional methods by transmission system operators of a given region and European methods by all transmission system operators to which a given method applies.

The situation is similar with the approval of methods by regulatory authorities, except for the European methods, for which the decision always rests with ACER. In case the regulators within a region are not able to agree on a common position, either due to lack of consensus (it is sufficient for one regulator to oppose), or if the deadline for the decision has passed, this method is also subject to ACER approval.

ACER's Decision on the determination of Capacity Calculation Regions (CCRs)⁵², issued on the basis of Regulation 2015/1222, outlined the framework for cooperation and joint coordination within particular regions by electricity TSOs and national regulatory authorities. The borders of the Polish bidding zone are assigned to three independent CCRs: Hansa (Polish-Swedish border), Core/Central Europe (Polish-German, Polish-Czech and Polish-Slovakian borders), Baltic (Polish-Lithuanian border). By ACER's Decision no. 10/2025 of 16 December 2025⁵³ a new region, Eastern Europe, was established (which covers the Polish-Ukrainian border). In addition, in Regulation 2017/2195 establishing a guideline on electricity balancing the notions of a relevant geographical area and the synchronous area are used. Regulation 2017/1485 establishing a guideline on electricity transmission system operation introduces a notion of a load-frequency control block (LFC block), which means a part of a synchronous area or an entire synchronous area, physically demarcated by measurement at the interconnections to other LFC blocks, covering at least one LFC area, operated by one or more TSOs fulfilling obligations of load-frequency control. The methods or conditions approved in 2025 on the basis of the above-mentioned legal acts are set out in Table 6.

With regard to electricity trading on the day-ahead and intraday markets, Regulation 2015/1222 required each Member State to designate at least one NEMO in each bidding zone on its territory. The role of NEMOs is to organise day-ahead and intraday market coupling processes, to match and allocate bids and offers for the sale and purchase of electricity, to publish market results and to conduct clearing and settlement of concluded contracts. Due to the specific nature of the activities, these roles are fulfilled in practice by power exchanges. The above regulation established two methods for allowing NEMOs to offer energy trading services in a given Member State. In the first case, a NEMO can be designated by the relevant regulatory authority. In the second case, a market operator designated in another Member State may provide services under the mutual designation recognition (the so-called passport) and exercise a function of a NEMO. In 2025, there were three NEMOs operating in the Polish bidding zone. The role of the nominated electricity market operator was performed by TGE S.A., which was again designated by the President of URE to exercise this function until 2 December 2027. In addition, two electricity market operators benefiting from the mutual nomination recognition mechanisms conduct their activity in Poland: EPEX SPOT SE and Nord Pool EMCO AS.

In order to enable more than one NEMO to operate within the Polish bidding zone, PSE S.A. has developed a mechanism allowing for the operation of multiple electricity market operators. This mechanism, set out in the document "Terms and conditions concerning the allocation of cross-zonal transmission capacity and other necessary mechanisms enabling the operation of more than one NEMO in Poland", was approved by a decision of the President of URE of 5 June 2017⁵⁴. The document sets out the rules governing cooperation between NEMO and the relationship between NEMO and the transmission system operator. Its implementation enables a uniform process for coupling bids and setting a single electricity price for the Polish bidding zone, regardless of which of NEMO's services a market participant uses.

⁵² The capacity calculation regions were established by ACER Decision No. 06/2016 of 17 November 2016 (published on the ACER's website, as amended).

⁵³ <https://www.acer.europa.eu/acer-decision-10-2025-amendment-determination-capacity-calculation-regions>

⁵⁴ <https://bip.ure.gov.pl/download/3/8956/20170605ZatwierdzenieWarunkowdotyczacychalokacjimiedzyobszarowych-zdolnosciprzesy.pdf>

Table 6. Methodologies or conditions approved in 2025 under regulations and guidelines

Regulation	Conditions or methodologies	Zone	Approval method
Regulation 2015/1222	Amendment to the fallback procedure for the Core region in accordance with Article 44 of Regulation 2015/1222	Core region	Decision of the President of URE of 7 January 2025
	Amendment to a common intraday capacity calculation methodology for the Core region in accordance with Article 20(2) of Regulation 2015/1222	Core region	Decision of the President of URE of 28 May 2025
	Amendment to a common capacity calculation methodology for the Hansa region in accordance with Article 20(2) of Regulation 2015/1222	Hansa region	Decision of the President of URE of 26 August 2025
	Amendment to a methodology related to products that can be taken into account in the single intraday coupling	EU	ACER Decision 03/2025 of 27 March 2025
	Amendment of the determination of Capacity Calculation Regions in accordance with Article 15(1) of Commission Regulation (EU) 2015/1222	EU	ACER Decision 10/2025 of 16 December 2025
	Amendment to the intraday cross zonal gate opening and gate closure times	EU	ACER Decision 11/2025 of 19 December 2025
Regulation 2016/631	Amendment of general application requirements arising from Regulation 2016/631	PL	Decision of the President of URE of 15 May 2025
Regulation 2016/1447	Amendment of general application requirements arising from Regulation 2016/1447	PL	Decision of the President of URE of 15 May 2025
Regulation 2016/1719	All Baltic CCR TSOs' Common capacity calculation methodology for long-term time frames in accordance with Article 10(1) of Regulation (EU) 2016/1719	Baltic region	Decision of the President of URE of 25 June 2025
	Amendment to the harmonised allocation rules for long-term transmission rights in accordance with Article 51 of Regulation 2016/1719	EU	ACER Decision 08/2025 of 17 September 2025
Regulation 2017/1485	Amendment of the FCR dimensioning rules for the Continental Europe synchronous area in accordance with Article 153(2) of Regulation (EU) 2017/1485	Continental Europe synchronous area	Decision of the President of URE of 2 April 2025
	Amendment of the rules of determination of LFC blocks for the Continental Europe synchronous area pursuant to Article 141(2) of Regulation (EU) 2017/1485	Continental Europe synchronous area	Decision of the President of URE of 30 June 2025
Regulation 2017/2195	Amendment of the methodology for the market-based allocation process of cross-zonal capacity for the exchange of balancing capacity for the Baltic capacity calculation region in accordance with Article 41(1) of Regulation (EU) 2017/2195	Baltic region	Decision of the President of URE of 7 January 2025
	Cross-zonal capacity calculation methodology within the balancing timeframe for the Hansa capacity calculation region in accordance with Article 37(3) of Regulation (EU) 2017/2195	Hansa region	Decision of the President of URE of 20 February 2025
	Amendment to the harmonized methodology for the allocation process of cross-zonal capacity for the exchange of balancing capacity or sharing of reserves in accordance with Article 38(3) of Regulation 2017/2195	EU	ACER Decision 01/2025 of 29 January 2025
Regulation 2017/2196	Amendment of the list of SGUs responsible for the implementation at their installations of measures resulting from the mandatory requirements set out in Regulations (EU) 2016/631, (EU) 2016/1388 and (EU) 2016/1447	PL	Decision of the President of URE of 28 August 2025

Regulation	Conditions or methodologies	Zone	Approval method
	or from national legislation, and the list of measures to be implemented by the SGUs concerned as determined by the TSO in accordance with Article 11(4)(c) and Article 23(4)(c) of Regulation 2017/2196		
Regulation 2019/943	Approval of PSE S.A.'s contribution to the 2024 report on the allocation of transmission capacity pursuant to Article 16 and the Action Plan established under Article 15 of Regulation (EU) 2019/943	PL	Decision of the President of URE of 10 July 2025
	Derogation for PSE S.A. from the requirement to apply a cross-zonal intraday gate closure time of 30 minutes before real-time in the Polish bidding zone, for a maximum period of 3 years, that is until 1 January 2029	PL	Decision of the President of URE of 27 November 2025
	Derogation for PSE S.A. from the obligation to make day-ahead cross-zonal capacity available pursuant to Article 16(8) of Regulation (2019/943), for 1 year, as regards Polish critical network elements taken into account in the day-ahead capacity calculation process in the Core region	PL / Core region	Decision of the President of URE of 18 December 2025
	First amendment to the Regional Coordination Centre Regional Procurement of Balancing Capacity Methodology in accordance with Article 37(1)(k) of Regulation 2019/943	EU	ACER Decision 09/2025 of 12 December 2025

Source: URE.

In August 2025, at the request of the electricity TSO, the President of URE approved an amendment to the currently applicable document entitled: "List of SGUs responsible for the implementation on their installations the measures that result from the mandatory requirements set out in Regulations (EU) 2016/631, (EU) 2016/1388 and (EU) 2016/1447 or from national legislation and the list of measures to be implemented by the SGUs concerned as defined by TSOs in accordance with Article 11(4)(c) and Article 23(4)(c) of Commission Regulation (EU) 2017/2196 of 24 November 2017 establishing a network code on electricity emergency and restoration)". The change of the existing List of SGUs was due to the need to update the following documents: *System Defence Plan* and *Recovery Plan* in terms of the List of SGUs due to the decommissioning of generating modules and the commissioning of generating modules – classified as existing and new generating modules in accordance with Regulation 2016/631. At the same time, electricity TSO has expanded the list of SGUs to include electricity storage (ES), arguing that, whilst ESs are not currently widely installed in the National Electricity System (NES), given the number of connection conditions issued and being issued for ES, as well as information on projects already underway, it is to be expected that they may play a significant role in the operation of the NES. Furthermore, given their technical capabilities, PSE S.A. notes that ES have great potential to stabilise the operation of the National Electricity System by balancing fluctuations in energy generation and consumption, as well as their ability to regulate voltage and frequency.

The decision of the President of URE of 2 April 2025 concerned a change to the rules for FCR dimensioning in accordance with Article 153(2) of Regulation 2017/1485 for the Continental Europe synchronous area. The previous rules were based on a deterministic approach to FCR dimensioning at the reference incident level, which Regulation 2017/1485 sets at 3,000 MW for the Continental Europe synchronous area, without any probabilistic dimensioning of FCR. However, Article 153(2) of Regulation 2017/ 1485 allows transmission system operators to adopt a probabilistic approach to the dimensioning of FCR, which, given the significant changes taking place in the electricity system due to the increasing generation of electricity from renewable sources characterised by considerable

variability, better takes into account the current and future operating conditions of the electricity system. The probabilistic method takes into account load, generation and inertia patterns, as well as the available means of utilising minimum inertia in real time, in order to reduce the probability of insufficient FCR occurring to a value of once in 20 years or less. The probabilistic model simulates the behaviour of the entire Continental European synchronous area in terms of frequency trends. This model uses a probabilistic simulation process to simulate the operating conditions of synchronous areas over a period of several years by generating random imbalances in capacity associated with frequency deviations and outages of significant network components.

The decision of the President of URE of 30 June 2025 on amending the rules of determination of LFC blocks for the Continental Europe synchronous area concerned the inclusion therein of the LFC areas and the LFC block of the transmission system operators of the Baltic States, namely Lithuania, Latvia and Estonia. The amendment was intended to reflect the situation following the synchronisation of the Baltic States with the Continental Europe area, which took place on 9 February 2025.

Implementation of Connection Network Codes

In 2025 the President of URE continued its activities related to the Grid Connection Network Codes (Regulations: 2016/631, 2016/1388 and 2016/1447).

Regulation 2016/631 in Title III set out the operational notification procedure for connection of new generating modules, with the connection procedure for each new generating module of type A, B, C and D. Pursuant to Article 33 of Regulation 2016/631, the operational notification procedure for connection of each new type D generating module⁵⁵ shall comprise:

- energisation operational notification ("EON"),
- interim operational notification ("ION")⁵⁶,
- final operational notification ("FON").

This procedure granted the regulatory authorities the power to grant derogations at the request of a power-generating facility owner or prospective owner, relevant system operator or relevant transmission system operator – from a provision or provisions of this regulation.

In 2025, the President of URE issued 7 decisions to extend the period for which the owner of a type D generating module can maintain the status of the "ION" operating notification – three decisions referred to the operating notification issued by the TSO, four decisions to the operating notification issued by the DSOs. Information on the decisions was included in the Register of Derogations from the Connection Requirements of Network Codes maintained by the President of URE in accordance with Article 64 of Regulation 2016/631 published on URE's website⁵⁷ and was published on the dedicated register of derogations maintained by ACER⁵⁸.

In turn, Regulation 2016/1388, in Chapter 2 of 'Title II', set out the authorisation procedure for the connection of any new demand facility connected to the transmission system, any new distribution

⁵⁵ Type D includes generating modules with a maximum power rating of 75 MW and above, as well as all generating modules, regardless of their maximum power, if the voltage at their point of connection is at least 110 kV.

⁵⁶ The ION operating notification entitles the generating facility owner to operate the generating module and power generation by using the grid connection for a specified period of time and is issued by the relevant system operator subject to the finalisation of the data verification and analysis process required under Article 35 of Regulation 2016/631. The maximum period for which the owner of a generating facility may maintain the status of an "ION" operating notification is 24 months, with Article 35(5) of Regulation 2016/631 allowing for the possibility of extending this period if the request for a derogation is submitted to the relevant system operator before the expiry of the above-mentioned period in accordance with the derogation procedure laid down in Article 60 of Regulation 2016/631.

⁵⁷ <https://bip.ure.gov.pl/bip/rejestr-i-bazy/rejestr-odstepstw-od-wymogow-p/4301,Rejestr-odstepstw-od-wymogow-przylaczniowych-kodeksow-sieciowych.html>

⁵⁸ <https://aegis.acer.europa.eu/record/>

installation connected to the transmission system, and any new distribution system connected to the transmission system, which includes:

- energisation operational notification ("EON"),
- interim operational notification ("ION"),
- final operational notification ("FON").

Under this procedure, regulatory authorities have been granted the power to grant derogations, upon application by the owner or prospective owner of a demand facility, a DSO/CDSO, a prospective DSO/CDSO, the relevant system operator or the relevant TSO, from one or more provisions of this Regulation.

In 2025, the President of URE issued one decision extending the period during which a distribution system operator may retain the 'ION' operating licence status for a distribution facility. The decision related to a permit issued by electricity TSO. Information regarding the decision was published in the register of derogations from the connection requirements of the network codes, maintained by the President of URE in accordance with Article 54 of Regulation 2016/1388, and available on the URE's website⁵⁹ and was also published in the dedicated register of derogations maintained by ACER⁶⁰.

As a result of the monitoring performed between October 2023 and April 2024 of the fulfilment by TSO and the five largest DSOs of their obligations regarding the issue of an interim operational notification ("ION") for the purpose of connecting each new type D power generating module, taking into account the derogation procedure set out in Article 60 of Regulation 2016/631, the President of URE initiated proceedings against three DSOs to impose a financial penalty. In two cases, the proceedings resulted in decisions finding a breach of the obligation set out in Article 60 of Regulation 2016/631 and imposing a financial penalty (decisions of the President of URE of 10 December 2024 and 9 June 2025). In one case, the proceedings concluded with a decision in which the imposition of a financial penalty was waived (decision of the President of URE of 2 April 2025).

In October 2025, URE received an application from electricity TSO for approval of an updated document entitled „Scope of data exchanged for the purposes of operational planning and control of the National Electricity System (method set out in Article 40(5) of SO GL regarding the scope of data exchanged)". The TSO justified the update of this document by citing a change in the rules and scope of the structural, planning and real-time data exchanged. With regard to structural data, the changes stem from the need to adapt the scope of the data and the rules governing its exchange to processes in the area of power system management and include, in particular:

- updating the scope of power generating module structural data and data and information on network elements,
- changing the data submission procedure – entities required to submit structural data shall submit it to the system operator to whose network they are connected.

With regard to planning data, the changes arise from the need to adapt the scope and rules governing the exchange of such data to the requirements arising from the planning of operations and the management of the NES, including compliance with the conditions for the safe operation of the NES, and include, in particular:

- updating the scope of planning data exchanged between the power generating module facility owner, the DSOs and the TSO – expanding and updating the data exchanged to the extent necessary for the implementation of the National Electricity System's operational planning and dispatch processes,
- a change to the procedure for submitting planning data – entities required to submit planning data shall submit it to the system operator to whose network they are connected,

⁵⁹ <https://bip.ure.gov.pl/bip/rejestr-y-i-bazy/rejestr-odstepstw-od-wymogow-p/4301,Rejestr-odstepstw-od-wymogow-przylaczeniowych-kodeksow-sieciowych.html>

⁶⁰ <https://aegis.acer.europa.eu/record/>

- a change in the resolution of power generating modules' work plans from 1 hour to 15 minutes (the balancing energy settlement period).

For similar reasons, changes are being made to the transmission of real-time data, which, in particular, introduce an obligation to transmit – in the case of type C and B power generating modules whose primary energy source is wind or solar radiation – respectively, wind speed measurements and solar radiation measurements, as well as air temperature at the location of these power generating modules. The proceedings concluded on 22 April 2026 with the issuance by the President of URE of a decision approving the document entitled “Scope of data exchanged for the purposes of operational planning and control of the National Electricity System (method set out in Article 40(5) of SO GL regarding the scope of data exchanged)”. The approved document will become effective on 1 February 2027.

Regulation (EU) 2016/631, in Article 3(1), prejudices that, as a general rule, the connection requirements apply to new generating modules which are considered significant, in accordance with the criteria set out in Article 5, however, Article 4(1)(a) and (b) provide for exceptional cases where existing generating modules are subject to the requirements of this Regulation. According to these provisions, existing generating modules shall not be subject to the requirements set out in this Regulation, except where a type C or type D generating module has been modified to such an extent that its connection agreement must be substantially revised in accordance with the following procedure:

- power-generating facility owners who intend to undertake the modernisation of a plant or replacement of equipment impacting the technical capabilities of the power-generating module shall notify their plans to the relevant system operator in advance,
- if the relevant system operator considers that the extent of the modernisation or replacement of equipment is such that a new connection agreement is required, the system operator shall notify the relevant regulatory authority or, where applicable, the Member State; and
- the relevant regulatory authority or, where applicable, the Member State shall decide if the existing connection agreement needs to be revised or a new connection agreement is required and which requirements of this Regulation shall apply.

In 2025, the President of URE issued four decisions pursuant to Article 4(1)(a)(iii) of Regulation 2016/ 631, in which, following notifications from the owner of a power generation facility regarding planned modernisation or replacement that could affect the technical capacity of a type D power generating module, the President of URE recognised the need to conclude new connection agreements and specified which requirements set out in Regulation 2016/631 apply.

In accordance with Article 4(1)(a) and (b) of Regulation 2016/1388, the requirements set out in that Regulation shall not apply to transmission-connected demand facilities, existing distribution facilities connected to the transmission system, existing transmission-connected distribution facilities, existing distribution systems and existing demand units that are or can be used by a demand facility or a closed distribution system to provide demand response services to a relevant system operator or relevant TSO, unless:

- a) an existing transmission-connected demand facility, an existing transmission-connected distribution facility, an existing distribution system, or an existing demand unit within a demand facility at a voltage level above 1 000 V or a closed distribution system connected at a voltage level above 1 000 V, has been modified to such an extent that its connection agreement must be substantially revised in accordance with the following procedure:
 - demand facility owners, DSO, or CDSO who intend to undertake the modernisation of a plant or replacement of equipment impacting the technical capabilities of the transmission-connected demand facility, the transmission-connected distribution facility, the distribution system, or the demand unit shall notify their plans to the relevant system operator in advance;

- if the relevant system operator considers that the extent of the modernisation or replacement of equipment is such that a new connection agreement is required, the system operator shall notify the relevant regulatory authority or, where applicable, the Member State; and
 - the relevant regulatory authority or, where applicable, the Member State shall decide if the existing connection agreement needs to be revised or a new connection agreement is required and which requirements of this Regulation shall apply; or
- b) a regulatory authority or, where applicable, a Member State decides to make an existing transmission-connected demand facility, an existing transmission-connected distribution facility, an existing distribution system, or an existing demand unit subject to all or some of the requirements of this Regulation, following a proposal from the relevant TSO in accordance with paragraphs 3, 4 and 5.

In 2025 the President of URE issued two decisions pursuant to Article 4(1)(a)(iii) of Regulation 2016/1388, in which it acknowledged the need to conclude a new connection agreement and indicated which requirement specified in the said regulation applies – in connection with the appropriate notification to the customer of the planned modernisation or replacement of equipment that may affect the technical capabilities of the existing distribution system connected to a system other than the transmission system; in one case, the decision concerned an existing distribution system connected to a system other than the transmission system, and in the other case, a demand facility connected to the transmission system.

In 2025, work by ENTSO-E, the EU DSO Entity, ACER and the regulatory authorities on the draft new Demand Response Network Code was completed. On 7 March 2025, ACER submitted a proposal for the new network code to the European Commission, together with proposals for amendments to Regulation 2017/2195, Regulation 2017/1485 and Regulation 2016/1388. The code is intended to set out requirements for demand response, including provisions on aggregation, energy storage, distributed generation and demand curtailment. Furthermore, it is intended to define obligations relating to ensuring that providers of energy resources and energy services have access to electricity markets, as well as to facilitate the award of contracts for relevant services by system operators.

3.1.8. Electromobility

The amendment to the Electromobility Act introduced a provision prohibiting electricity DSO from being the operator of a public charging station, the owner of the station or the charging service provider. The legislator set out three exceptions to this provision. The provision shall not apply to charging stations used by electricity DSO only for its own use (Article 3a para. 5 of the Electromobility Act). The second exception applies to the case where the DSO has conducted a tender procedure for the sale of public charging stations in an open, transparent and non-discriminatory manner. Pursuant to Article 3a para. 2 of the Electromobility Act, a DSO may remain the owner of a public charging station where the following conditions are jointly met:

- 1) In order to sell a public charging station, it conducted an open, transparent and non-discriminatory tender:
 - a) the general terms and conditions of which have been approved by the President of URE at its request, by way of a decision;
 - b) as a result of which no contract for the sale of this station was concluded, in particular due to the inability to provide charging services immediately after the purchase of this station and at market prices,
- 2) It takes measures to ensure that the operator of the public charging station it owns fulfils the obligation to ensure that charging service providers have access to the public charging station, on the basis of a contract concluded at arm's length.

The third exception concerns closed distribution systems, for which the DSO has obtained a decision from the President of URE stating that, in relation to that operator, the prohibition on acting as

an operator of a public charging station, the owner of such a station or a provider of charging services does not apply⁶¹. By the end of 2025, URE had not received any application from the DSO for such a decision.

Pursuant to Article 24 para. 4 of the amendment to the Electromobility Act, in the case of public charging stations for which before the date of entry into force of the amending Act, the DSO did not select an operator of a public charging station in accordance with Article 65 para. 3 of the Electromobility Act, the operator of a public charging station designated in accordance with Article 65 para. 2 of the Electromobility Act performs its tasks until the performance of the tasks of the operator of a public charging station is transferred to another entity or the DSO sells a public charging station.

In 2025, due to the fact that one DSO announced the sale of public charging stations by way of a tender, further administrative proceedings were initiated to declare invalid the decision to designate an energy company to act as an operator of a public charging station and a charging service provider. Following the proceedings, the President of URE stated that the decision was invalid for the Gorzów Wielkopolski municipality. Current information in this respect is published on URE's website⁶².

3.2. COMPETITION AND MARKET OPERATION

3.2.1. Wholesale market

The volume of gross domestic electricity production in 2025 was lower than in the previous year and amounted to 166,529 GWh (a decrease of 0.28% compared to 2024). In the reported period, gross domestic electricity consumption amounted to 167,484 GWh and decreased by 0.87% compared to 2024.

The GDP in 2025, according to the estimates of the Central Statistical Office, increased by 3.6%⁶³ and was 4.5 percentage points higher than the increase in domestic energy consumption.

In 2025, imports accounted for 8.7% of total revenue in the national balance of physical flows of electricity, while exports accounted for 8.2% of electricity outflows. Compared to 2024, the share of imports increased by 1.4 percentage point, while the share of exports remained unchanged.

The structure of electricity production in 2025 did not change significantly compared to the previous year.

In 2025, the installed capacity in the national electricity system was 77,331 MW, and the generating capacity was 77,177 MW, which is an increase of 7.1% and 7.9%, respectively, compared to 2024⁶⁴.

In 2025 the average annual demand for capacity was 24,846 MW (an increase of 8.6% compared to the previous year), with a maximum demand of 27,550 MW (a decrease of 3.3% compared to the previous year).

The ratio of available capacity to generating capacity in 2025 had a decreasing trend and amounted to 48.3% (a decrease of (-) 2.6% age points compared to 2024)⁶⁵.

Entity structure of the wholesale energy market

In 2025, as in previous years, the share of generators from the largest groups in the volume of energy fed into the NES (PGE Polska Grupa Energetyczna S.A., ENEA S.A., ORLEN S.A.) changed slightly.

⁶¹ Article 3a para. 5a of the Electromobility Act.

⁶² <https://www.ure.gov.pl/pl/energia-elektryczna/operatorzy-ogolnodostep/9283,Wykaz-przedsiębiorstw-energetycznych-wyznaczonych-do-pelnienia-funkcji-operatora.html>

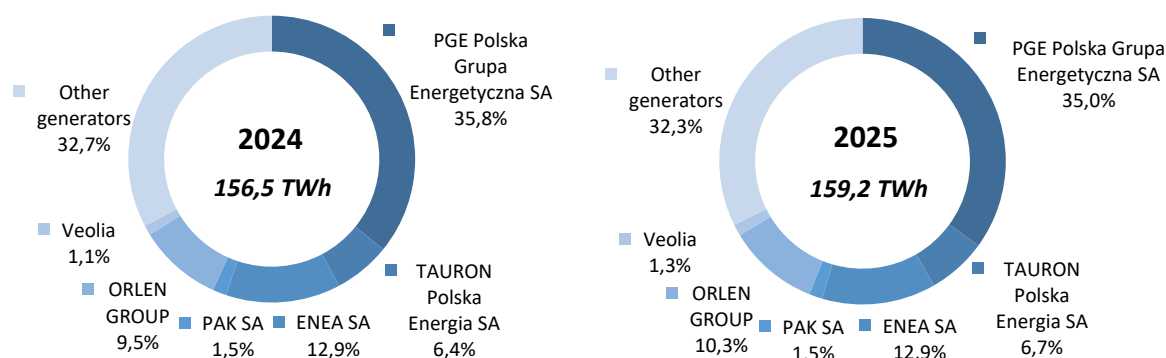
⁶³ <https://stat.gov.pl/obszary-tematyczne/rachunki-narodowe/roczne-rachunki-narodowe/produkt-krajowy-brutto-w-2025-roku-szacunek-wstepny,2,15.html>

⁶⁴ As at 31 December 2024 and 31 December 2025, data from PSE S.A.

⁶⁵ Data based on average annual values from the evening peak of business days, data from PSE S.A.

This trend is due to a gradual reduction in gross electricity production in 2025 compared to 2024 from fossil fuels, which dominate the power generation structures in these groups. The PGE Polska Grupa Energetyczna S.A. group still had the largest share in the energy market in the electricity generation subsector. It should be highlighted that the share of this group is decreasing year by year, both in terms of the volume of energy fed into the grid and the installed capacity, compared to other generators. In the analysed period, this group continued to maintain its leading position on the market of sales to final customers.

Figure 12. Share of groups in the volume of electricity fed into the grid in 2024–2025 (taking into account the entity structure as at 31 December of a given year)



Note: The group of "other generators" includes both generators which are part of groups (e.g. Azoty, E.ON, Polenergia) and generators operating individually on the electricity generation market, that is outside groups.

Source: Data from the Ministry of Energy and URE.

Market share ratio of the three largest market players, measured by energy fed into the grid (taking into account the amount of energy supplied by generators directly to final customers and the amount of electricity returned from the energy storage facility to the NES), in 2025 remained at the 2024 level and amounted to 58.2%. A clear downward trend, for a consecutive year, was also maintained by the share of the three largest generators in installed capacity – a decrease of 1.4 percentage points. The top three generators both in terms of installed capacity and the volume of energy fed into the NES, concentrated in groups, in the year 2025 under investigation, were: PGE Polska Grupa Energetyczna S.A., ENEA S.A. and ORLEN S.A.. Generators of the TAURON Polska Energia S.A. group are in fourth position for a consecutive year.

Table 7. Market shares and state of concentration of the generation subsector*

Year	Number of companies holding at least a 5% share in installed capacity	Number of companies holding at least a 5% share in energy fed into the grid	Share of three largest entities in installed capacity [%]	Share of three largest entities in energy fed into the grid [%]	HHI ⁶⁶	
					Installed capacity	energy fed into the grid
2023	4	4	44.2	61.4	976.2	1 762.1
2024	4	4	42.0	58.2	915.1	1 597.7
2025	4	4	40.6	58.2	856.4	1 558.3

⁶⁶ The Herfindahl-Hirschman index (HHI) is defined as the sum of squares of individual market shares of all companies forming a given branch: HHI>5,000 – very high concentration, HHI from 1,800 to 5,000 – high concentration, HHI from 750 to 1,800 – medium concentration, below 750 – low concentration (according to the "Report on progress in creating the internal electricity and gas market", Brussels 2005 and J. Kaminski: *Methods for estimating market power in the energy sector*, Polityka Energetyczna, Volume 12, Paper 2/2, 2009).

* For all entities operating in the generation sector which are subject to an obligation of reporting statistics, including installed capacity and energy fed into the grid from renewable sources.

When calculating the market share ratios of the three largest entities and HHI ratios, both by energy fed into the grid and by installed capacity, the structure of entities as at 31 December of the year under review was taken into account.

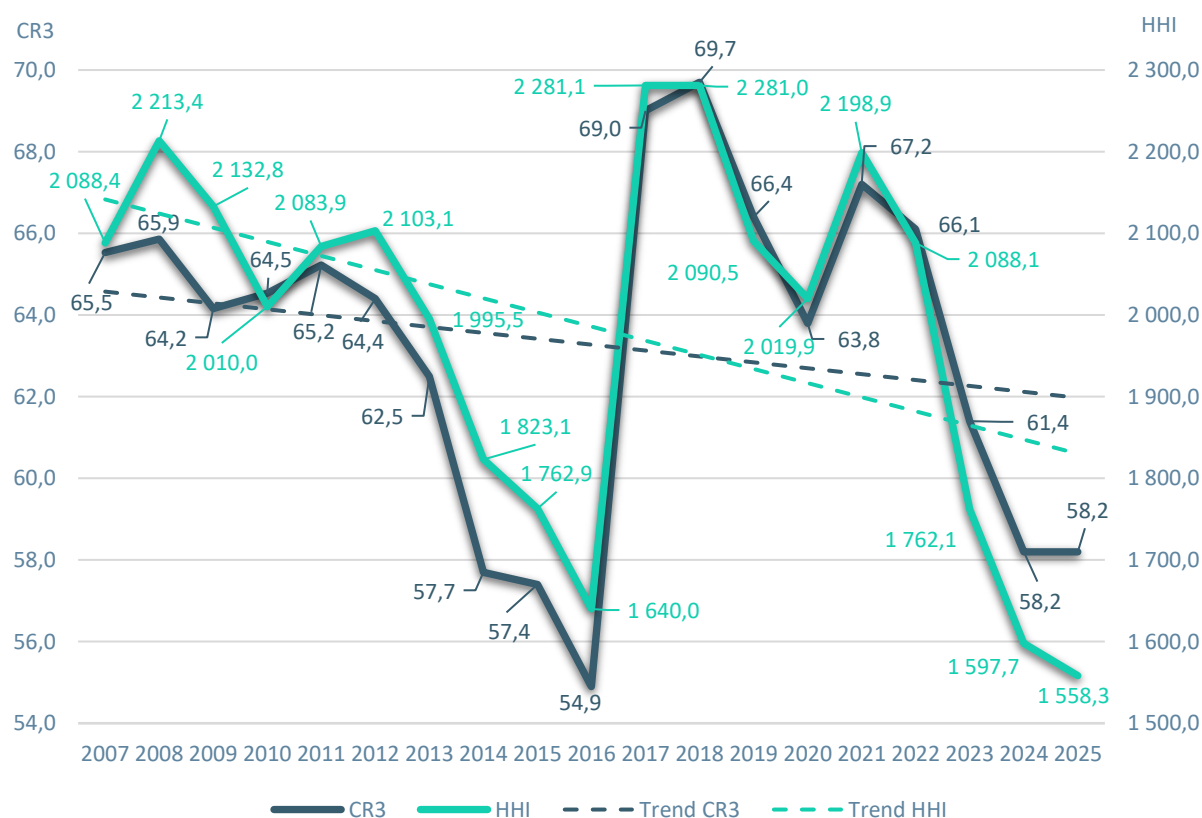
Source: Data from the Ministry of Energy and URE.

The long-term downward trend concerning in particular HHI measured by installed capacity and by the volume of energy fed into the grid (including the amount of energy supplied by generators directly to final customers and the amount of electricity returned from the energy storage facility to the NES), changed significantly in 2017, the intensity of which is also observed in 2025. The concentration ratios for installed capacity and energy fed into the grid maintained a downward trend for another year (in 2025, compared to 2024, they decreased by 6.4% and 2.5%, respectively).

It is worth noting that the level of the above-mentioned ratios in 2025 indicates that the degree of concentration on the generation market was within the range of the average concentration on the generation market.

The change in the concentration index and the market share ratio of the three largest entities in the generation subsector in the years 2007-2025 is presented in the figure below.

Figure 13. Concentration level in generation subsector and market shares of largest entities by volume of energy fed into the grid 2007–2025



Source: Data from the Ministry of Energy and URE.

With regard to the concentration data from recent years presented above, it should be noted that they reflect the dynamics of electricity production from fossil fuels and various renewable sources. The declines in both concentration indices are mainly driven by an increase in electricity production from small, dispersed renewable energy sources in the national energy generation mix and a gradual annual decline in production from fossil fuels.

Sales and purchase of energy in particular market segments

The structure and mechanisms of the wholesale market operation do not differ from the corresponding structures and mechanisms that have been developed in most other European countries, considered to be competitive markets. Market participants have, on equal terms, wide access to various forms of purchase and sale of electricity and access to information on the volumes and prices at which electricity is contracted and sold on the wholesale market.

The tables below present the forms of purchase and sale of electricity in the generation and trading segments in 2023–2025.

Table 8. Forms of electricity sales by generators in 2023–2025 [TWh]

Year	Trading companies	Regulated markets, including power exchange	Balancing market	Exports	Final customers	Other sales*
2023	38.7	69.1	12.0	0.0	2.1	0.2
2024**	66.1	38.1	10.5	0.0	1.0	0.1
2025	80.0	26.8	9.2	0.0	0.9	0.1

* Other sales include volumes of electricity sold to electricity TSO and DSOs, to small local distributors and to other customers.

** The data have been changed compared to the data in the National Report of the President of URE for 2024 due to the correction of the data by the surveyed entities.

Source: Data from the Ministry of Energy and URE.

Table 9. Forms of electricity sales by trading companies in 2023–2025 [TWh]

Year	Trading companies	Regulated markets, including power exchange	Balancing market	Exports	Final customers	Other sales*
2023	112.3	103.7	11.3	4.2	125.8	20.0
2024**	136.6	70.3	8.3	0.6	125.1	23.7
2025	129.3	82.0	6.4	1.4	126.8	31.2

* Other sales include the volumes of electricity sold to electricity TSO and DSOs, to small local distributors, to generation companies and to other customers.

** The data have been changed compared to the data in the National Report of the President of URE for 2024 due to the correction of data by the surveyed entities.

Source: Data from the Ministry of Energy and URE.

Purchase of energy in respective market segments

The tables below present the development of forms of electricity purchase in the generation and trading segments in 2023–2025.

Table 10. Forms of electricity purchase by generators in 2023–2025 [TWh]

Year	Trading companies	Regulated markets, including power exchange	Balancing market	Imports	Other purchase directions
2023	4.6	2.1	7.2	0.0	0.0
2024*	5.2	2.6	5.6	0.0	0.0
2025	8.9	3.9	3.1	0.0	0.0

* The data have been changed compared to the data in the National Report of the President of URE for 2024 due to the correction of data by the surveyed entities.

Source: Data from the Ministry of Energy and URE.

Table 11. Forms of electricity purchase by trading companies in 2023–2025 [TWh]

Year	Power plants	RES installations directly	Trading companies	Regulated markets, including power exchange	Balancing market	Imports	Other purchase directions	Obligated supplier**
2023	61.3	20.6	108.1	171.1	8.8	4.0	1.7	0.2
2024*	90.8	21.1	133.1	105.6	10.1	2.5	3.5	0.2
2025	106.4	22.5	128.2	105.4	21.0	1.0	3.2	0.4

* The data have been changed compared to the data in the National Report of the President of URE for 2024 due to the correction of data by the surveyed entities.

** Obligated supplier – includes the purchase of electricity from a micro-installation other than a prosumer and from an installation other than micro-installation.

Source: Data from the Ministry of Energy and URE.

Data presented in Tables 10 and 11 show that electricity producers increase their energy purchases from trading companies and on regulated markets year by year (an increase in 2025 compared to 2024 by 71% and 50%, respectively). In contrast, trading companies purchase more and more energy on the balancing market (an increase in 2025 by 108% compared to 2024) and directly from power plants (an increase in 2025 by 17% compared to 2024).

3.2.1.1. Monitoring the level of prices, the level of transparency, the level and effectiveness of market opening and competition

The prices of electricity supplied in 2025 are illustrated by three price indices published by the President of URE, that is the average annual and quarterly price of electricity sold on the competitive market and the average quarterly price of electricity sold calculated under Article 49aa para. 2 of the Energy Law Act.

Table 12. Price indices published by the President of URE

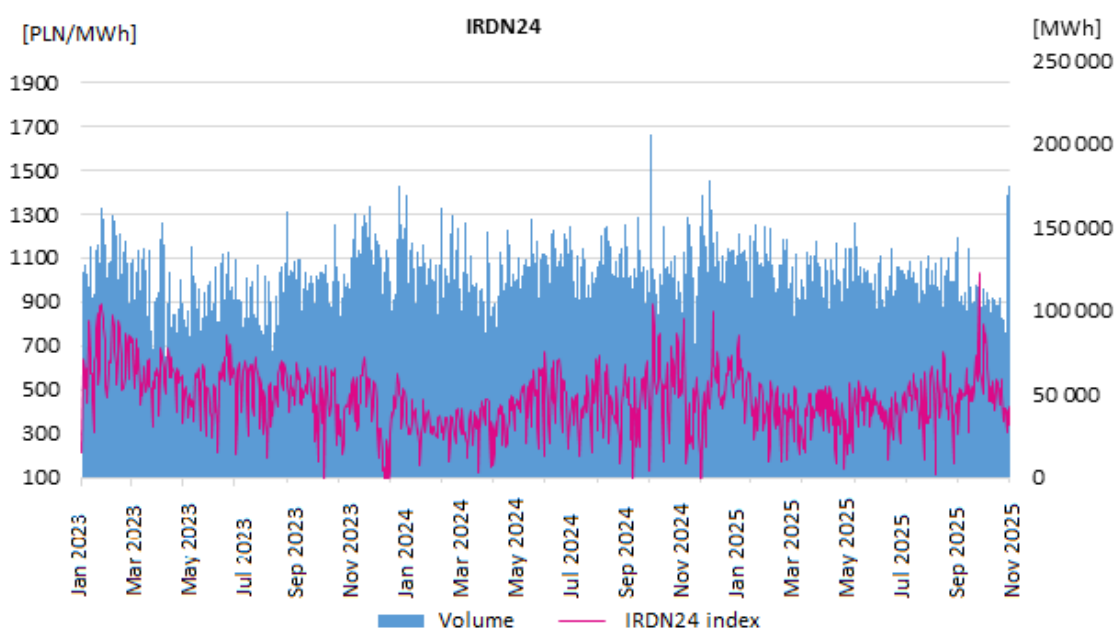
Index	Year 2025			
Price of electricity for a household customer including the fee for the provision of electricity distribution services [PLN/kWh] (<i>excise duty included and VAT excluded</i>) (Article 23 para. 2 item 18 section d of the Energy Law Act)	0.9198			
Average annual selling price of electricity on the competitive market [PLN/MWh] (Article 23 para. 2 item 18 section b of the Energy Law Act)	458.24			
Average quarterly selling price of electricity on the competitive market [PLN/MWh] (Article 23 para. 2 item 18a of the Energy Law Act)	I quarter 474.68	II quarter 424.37	III quarter 452.88	IV quarter 477.24
Average quarterly price of electricity calculated on the basis of information on contracts or settlement agreements concluded within groups, under which energy companies involved in electricity generation sell, buy or settle electricity [PLN/MWh] (Article 49aa para. 2 of the Energy Law Act)	I quarter 475,77	II quarter 446,76	III quarter 456,69	IV quarter 470,88

Source: URE based on data from TGE S.A., ARE S.A. and electricity generators.

SPOT TGE S.A.

The figure below presents development of electricity prices on the Day-Ahead Market (DAM) operated by TGE S.A., measured by the IRDN24 index in 2025. This index represents the arithmetic average price of all transactions, except for block contracts, on the DAM trading session, calculated after the delivery date for the entire 24 hours.

Figure 14. Average daily electricity prices in SPOT transactions measured by the IRDN24 index [PLN/MWh] and daily volume of electricity traded on the Day-Ahead Market (excluding block contracts) [MWh] in particular months of 2023–2025



Source: URE, on the basis of data provided by TGE S.A.

The volume-weighted average price of electricity on the DAM in 2025 amounted to 445.27 PLN/MWh and was higher than in 2024 by 20.33 PLN/MWh, when the price was 424.94 PLN/MWh.

Prices on the CFIM/EFM OTF market of TGE S.A.

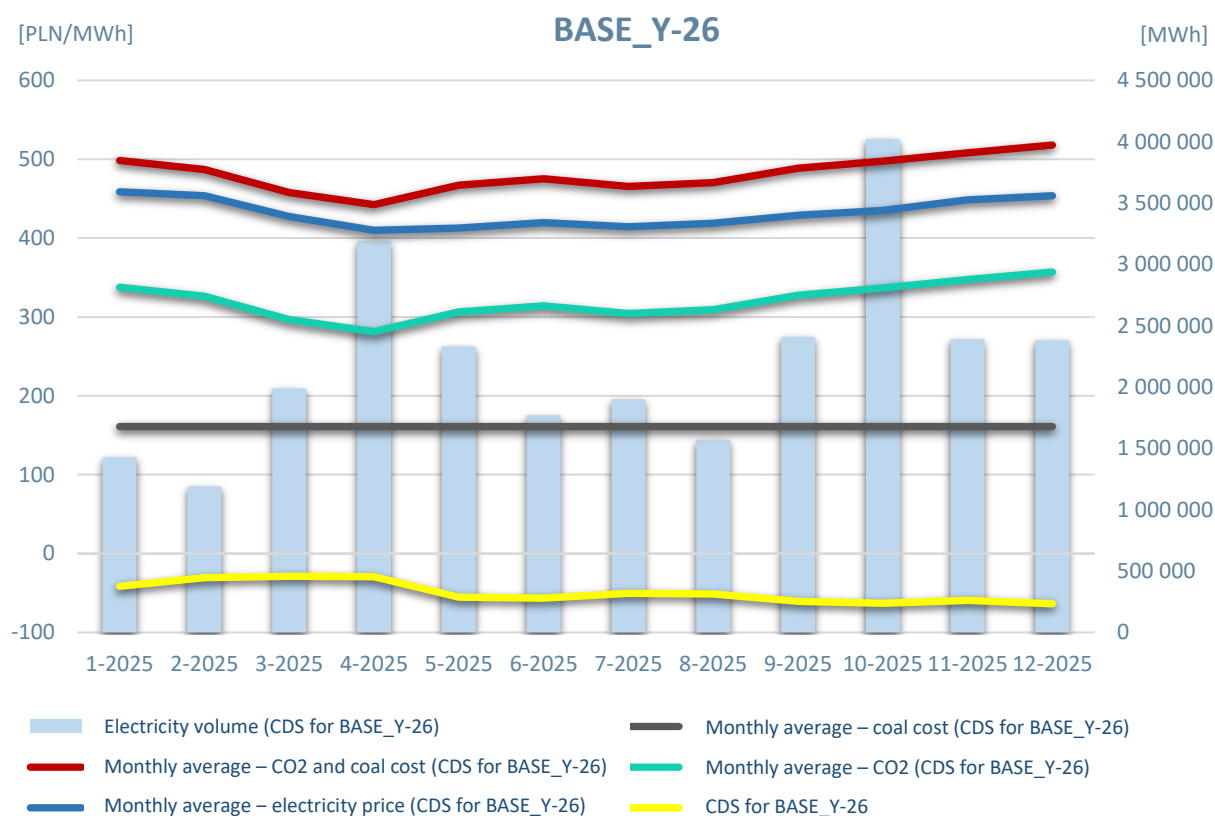
A decrease in electricity prices was recorded on the forward market operated by TGE S.A., which is reflected in a year-on-year decrease in the prices of BASE_Y forward contracts (a yearly contract with baseload delivery for the next year). The volume-weighted average transaction price of the BASE_Y-26 contract for the whole of 2025 was 430.50 PLN/MWh, while a year earlier it was 449.80 PLN/MWh for the corresponding BASE_Y-25 forward contracts, so it was higher by 19.30 PLN/MWh.

At the same time, the average monthly price of BASE_Y-26 contracts concluded in December 2025 was 453.92 PLN/MWh, while the average monthly price of corresponding BASE_Y-25 contracts concluded in December 2024 amounted to 426.75 PLN/MWh. This means an increase in the price of these contracts by 6.37%.

Despite limited resources and options, the President of URE also performs regular monitoring of the wholesale electricity market, including in terms of components affecting the level of electricity prices, such as, among others, the prices of CO₂ emission allowances and coal prices. In particular, the level of the Clean Dark Spread (CDS) indicator was examined by the President of URE⁶⁷.

⁶⁷ CDS = CEE – (CP + CCO₂), where: CDS – Clean Dark Spread index; CEE – net electricity price in PLN/MWh; CP – coal price converted into the cost of production of 1 MWh of electricity net from hard coal in PLN/MWh; CCO₂ – CO₂ emission allowance price converted into the cost of CO₂ emission for production of 1 MWh of electricity net in PLN/MWh.

Figure 15. Average monthly CDS against average monthly electricity prices – instrument BASE_Y-26⁶⁸ quoted on TGE S.A. in 2025 [PLN/MWh]



Source: Own analysis on the basis of data of TGE S.A., ICE, ARP.

Wholesale energy market transparency – implementation of obligations under the REMIT Regulation

Wholesale energy market participants, in accordance with the REMIT Regulation⁶⁹, are prohibited from manipulating or attempting to manipulate the market, as well as trading on the basis of inside information.

New competences of the President of URE

The REMIT II Regulation has introduced a number of new competences and obligations for the President of URE, while their additional scope is scheduled for implementation into national law, that is, in the draft Act amending the Energy Law Act and certain other acts, which was processed in 2025 (No. UC84 in the list of legislative and programme work of the Council of Ministers, Sejm paper No. 2150). The legislative work aimed at ensuring the appropriate application of the REMIT II Regulation was not completed in 2025.

On 5 February 2025, the second amendment to the 2024 REMIT Regulation entered into force. Under its provisions, the competences of the President of URE under the REMIT Regulation were

⁶⁸ One-year forward contract for the supply of electricity, due to be performed in 2025.

⁶⁹ Amended by Regulation 2024/1106 and Regulation 2024/1789.

extended to cover, in addition to the wholesale electricity market and the natural gas market, the wholesale hydrogen market⁷⁰.

On the President of URE, like on other national regulatory authorities, a new annual reporting obligation to ACER has been imposed regarding PPAET arrangements, systems and procedures and their effectiveness, as well as the analysis by national regulatory authorities of suspicious transactions and their response to the poor quality of reporting and non-reporting of suspicious transactions, as well as the related enforcement and sanction actions taken by them.

In addition, the amendment to the REMIT Regulation has increased the responsibilities of national regulatory authorities, including the President of URE, in the field of wholesale energy market supervision, cooperation with ACER and other national energy regulators, financial supervisors and the European Securities and Markets Authority (ESMA), competition protection authorities, tax authorities and EUROFISC, as well as other institutions at the national level.

Registration in the national register of market participants

The key obligations of wholesale energy market participants include registering and continuously updating data in the national register of market participants⁷¹.

The registration of Polish energy market participants is conducted by the President of URE through the CEREMP system⁷², developed by ACER.

At the end of 2025, there were 1,218 market participants registered in the CEREMP system managed by URE (approximately 5.89% of all registered entities). The growth in the number of market participants registered by URE in 2025 compared to 2024 amounted to approximately 10.03%.

Data reporting to ACER

Reporting data to ACER is preceded by the obligation to register market participants in the national register of these participants⁷³. Wholesale energy market participants report information on concluded transactions and orders⁷⁴ to trade through entities that have been granted the status of the so-called Registered Reporting Mechanism (RRM) granted by ACER⁷⁵. At the end of 2025, three entities in Poland held the status of RRM, that is: TGE S.A., OGP GAZ-SYSTEM S.A. and PSE S.A.

Publication of inside information

Under the REMIT II Regulation, the effective compliance with the obligation to publish inside information by market participants can only take place through Inside Information Platforms (IIPs)⁷⁶.

As of 1 January 2023, wholesale energy market participants can no longer use their websites as a backup solution for the publication of inside information. In the event of an emergency, market

⁷⁰ Pursuant to Article 83 of Regulation (EU) 2024/1789 of the European Parliament and of the Council of 13 June 2024 on the internal markets for renewable gas, natural gas and hydrogen, amending Regulations (EU) No 1227/2011, (EU) 2017/1938, (EU) 2019/942 and (EU) 2022/869 and Decision (EU) 2017/684 and repealing Regulation (EC) No 715/2009 (recast) (EU OJ L 2024/1789).

⁷¹ Article 9 (1)(5) of the REMIT Regulation.

⁷² https://www.acer-remit.eu/ceremp/home?nraShortName=20&lang=pl_PL

⁷³ Article 8(1) of the REMIT Regulation.

⁷⁴ The data to be transmitted are collected by ACER using the ARIS system (ACER REMIT Information System) set up for this purpose.

⁷⁵ Pursuant to Article 2(16) of the REMIT Regulation, as of 7 May 2024 the Registered Reporting Mechanism means a legal person authorised pursuant to this Regulation to report or to provide the service of reporting details of transactions, including orders to trade, and fundamental data to the Agency on its own behalf or on behalf of market participants (editorial comment: subject to the provisions of Article 9a(1)(3) of the REMIT Regulation).

⁷⁶ See: Article 4(1) of the REMIT Regulation.

participants must only use the back-up solutions provided by the relevant IIP, including such as the publication of inside information through another IIP⁷⁷.

Wholesale energy market participants are required to indicate in the national register of market participants CEREMP selected IIPs on which they publish the required inside information.

In 2025, the ACER list published on the REMIT PORTAL website⁷⁸, among the entities applying for the recognition by ACER of platforms operated by these entities as compliant with the requirements specified for IIPs⁷⁹, and entities whose platforms passed at least the first stage of ACER assessment, included TGE S.A., operating the Exchange Information Platform (GPI)⁸⁰ for the wholesale electricity market and OGP GAZ-SYSTEM S.A., operating the wholesale gas market platform since 2019 and since 2021 also for the wholesale electricity market – the Gas Inside Information Platform (GIIP). Both TGE S.A. and OGP GAZ-SYSTEM S.A. have successfully passed all stages of the ACER assessment.

Inside information platforms that have been registered by the Agency pursuant to Regulation 1348/2014 and included in the list of inside information platforms maintained by the Agency may continue their activities until the Agency takes a decision on authorisation pursuant to Article 4a(1) and (2) of the REMIT Regulation. The new regulations for IIPs⁸¹, introduced by the REMIT II Regulation into the REMIT Regulation in Article 4a(1)-(8) regarding the authorisation requirement and ACER's supervision over IIPs, will apply from the entry into force of the delegated act⁸² adopted by the European Commission pursuant to Article 4a(8) of the REMIT Regulation.

PPAETs' obligations

In the light of Article 15(1) and (2) of the REMIT Regulation, amended by the REMIT II Regulation, the supervision of the wholesale energy market in terms of detecting potential breaches of Article 3 (prohibition of insider trading), Article 4 (obligation to disclose inside information to the public) or Article 5 (prohibition of market manipulation) of the REMIT Regulation is carried out by two categories of entities, covered jointly by a common definition of Persons Professionally Arranging or Executing Transactions (PPAETs)⁸³:

- Persons professionally arranging transactions (PPAT), and
- Persons professionally executing transactions (PPET).

⁷⁷ ACER publication "REMIT Quarterly" (Issue No. 31 /Q4 2022), information entitled "Disclosure of inside information"; https://www.acer.europa.eu/sites/default/files/REMIT/REMIT%20Reports%20and%20Recommendations/REMIT%20Quarterly/REMITQuarterly_Q4_2022_1.0.pdf

⁷⁸ <https://www.acer-remit.eu/portal/list-inside-platforms#>

⁷⁹ Pursuant to Article 4a(8) of the REMIT Regulation.

⁸⁰ The Exchange Information Platform (GPI) has been in place since 27 February 2014 and was established with the cooperation of representatives from the entire electricity sector under the patronage of the President of URE.

⁸¹ "Inside information platform" means a person authorised under the REMIT Regulation to provide services of operating a platform for disclosing inside information and reporting disclosed inside information to the Agency (ACER) on behalf of market participants (editor's note: subject to Article 4a(1) and (2) of the REMIT Regulation).

⁸² Commission Delegated Regulation (EU) 2026/255 of 30 January 2026 supplementing Regulation (EU) No 1227/2011 of the European Parliament and of the Council as regards the necessary details for the authorisation and supervision of inside information platforms and registered reporting mechanisms by the European Union Agency for the Cooperation of Energy Regulators.

⁸³ Pursuant to Article 2(8a) of the REMIT Regulation: "person professionally arranging or executing transactions" means a person professionally engaged in the reception and transmission of orders for, or in the execution of transactions in, wholesale energy products".

A detailed concept and obligations of PPAET are described in ACER's open letter of 25 September 2024: *Open letter on the designation of representatives by non-EU market participants and on the new obligations of persons professionally arranging or executing transactions (PPAETs), according to the revised REMIT* and Chapter 9 of ACER Guidance "ACER Guidance on the application of Regulation (EU) No 1227/2011 of the European Parliament and of the Council of 25 October 2011 on wholesale energy market integrity and transparency", 6.1st Edition, 18 December 2024.

https://www.acer.europa.eu/sites/default/files/documents/Other%20Documents/6.1st_Edition_ACER_Guidance.pdf

In 2025, as in previous years, in Poland, three entities were persons professionally arranging transactions (PPAT): TGE S.A., PSE S.A. and OGP GAZ-SYSTEM S.A.

In 2025, no persons professionally executing transactions (PPET) referred to in Article 15(2) of the REMIT Regulation were identified on the Polish energy market.

Notification of violations

PPAETs are required, under Article 15(1) and (2) of the REMIT Regulation, to notify ACER and the relevant national regulatory authorities (in Poland – the President of URE) of any potential breaches of Articles 3, 4 or 5 of the REMIT Regulation, with the new PPAT obligations under Article 15(1) became effective on 7 May 2024, and the obligations of PPET, under Article 15(2), became effective on 8 November 2024.

PPAETs are required to notify ACER and the relevant national regulatory authorities (in Poland – the President of URE) of the above-mentioned potential breaches without delay and in any event no later than four weeks from the date on which the person became aware of the occurrence of the suspicious event.

In 2025, one Polish PPAT reported two cases of suspected market manipulation or attempted market manipulation by wholesale energy market participants to the President of URE. Based on the received Suspicious Transaction or Order Reports (STORs), the President of URE initiated supervisory activities in 2025, which will be continued in 2026.

Table 13. Categories of entities under the REMIT Regulation

Status as at the end of 2025	EU	Poland
Market participants registered with CEREMP	20 674	1 218
Registered Reporting Mechanisms (RRM)	105	3
Entities applying to ACER for IIP status and entities that have passed at least the first stage of ACER* evaluation as IIP	21	2
PPATs	no current data**	3
PPETs	no data	no data

* As at the end of 2025, excluding Central Transparency Platforms.

** As at November 2025, ACER identified 293 PPATs across the EU and selected third countries (according to the ACER report: *Market surveillance by persons professionally arranging or executing transactions; Arrangements, systems and procedures*; 8 May 2026⁸⁴).

Source: ACER's website – REMIT PORTAL.

Cooperation of the President of URE with other regulatory authorities and ACER with regard to the implementation of obligations under the REMIT Regulation

In 2025, representatives of the President of URE participated in ACER working groups. In addition to discussions on the effectiveness of wholesale energy market supervision in the context of, among others, algorithmic trading, the issues of the amendment to the REMIT Regulation, the implementation of which into national legal systems was an important aspect of regulatory work last year, were raised. The cooperation took place in the form of on-line meetings, as well as physical meetings, and through the exchange of information and opinions in electronic form.

An important aspect of the work involved meetings with the European Commission, ACER and other national regulatory authorities regarding the draft of the new implementing regulation replacing

⁸⁴ <https://www.acer.europa.eu/sites/default/files/documents/Publications/ACER-Report-PPAETs-market-surveillance-2026.pdf>

Regulation 1348/2014, and the draft delegated act of the European Commission concerning registered reporting mechanisms and inside information platforms.

Communication with participants of the wholesale energy market

The most important information related to the REMIT Regulation has been published on the URE's website⁸⁵. Market players may also send their questions about performance of obligations arising from the above-mentioned Regulation and from secondary legislation concerning the registration of market participants in the national register to the Office to a dedicated e-mail address⁸⁶. Employees of URE performing tasks related to the REMIT Regulation are also available by phone⁸⁷. In turn, ACER runs the so-called "REMIT Portal" on its website⁸⁸ dedicated to all issues contained in the REMIT Regulation.

Wholesale energy market participants, as well as other entities and institutions, may report suspected violations of the REMIT Regulation through ACER's online platform (Notification Platform⁸⁹), as well as, with the exception of PPAETs, directly to the President of URE, as referred to below.

Administrative and criminal sanctions for breaches of the REMIT Regulation

Administrative and criminal sanctions for breaches of the REMIT Regulation were provided for in the Energy Law Act⁹⁰ and, in 2025, they constituted the only available means of enforcing the provisions of the REMIT Regulation by the President of URE⁹¹ and the courts⁹².

In 2025, the President of URE did not conduct any administrative proceedings, nor did the President of URE issue any administrative decision imposing a financial penalty for breaching the provisions of the REMIT Regulation. On the other hand, in 2025, the courts issued three judgments upholding the appealed decisions of the President of URE, issued in 2023 and 2024 respectively, regarding the imposition of financial penalties pursuant to Article 56 para. 1 item 40 of the Energy Law Act, that is for failure to comply with the obligation to submit to ACER the data referred to in Article 8(1) of the REMIT Regulation within the deadline referred to in Article 7 of Regulation 1348/2014. Two judgments were rendered in the first instance by SOKiK (Court of Competition and Consumer Protection), and one judgment was issued by the court of second instance – the Court of Appeal in Warsaw, upholding the 2023 decision of the President of URE on the imposition of a financial penalty.

Explanatory proceedings

As part of the wholesale energy market supervision in 2025, the President of URE analysed 16 cases related to suspected manipulation or attempted manipulation and/or unlawful use of inside information referred to in the REMIT Regulation.

The aforementioned cases are characterised by a high degree of complexity due to their specific nature and intricate character. They require an individual approach to each analysed case against the changing national and EU legislation over recent years, including successively introduced market reforms as well as amendments to instructions and procedures implemented by entities of significant importance for the functioning of wholesale energy markets, such as TSOs. Cases involving breaches of Article 5 of the REMIT Regulation (prohibition of market manipulation) frequently require

⁸⁵ <https://www.ure.gov.pl/pl/urzed/prawo/prawo-wspolnotowe/remit/aktualnosci-remit>

⁸⁶ REMIT.rejestracja@ure.gov.pl

⁸⁷ <https://www.ure.gov.pl/pl/urzed/informacje-ogolne/departamenty/9521,Departament-Monitorowania-Rynku.html?search=421604661983>

⁸⁸ <https://www.acer-remit.eu/portal/home>

⁸⁹ <https://www.acer-remit.eu/np/home>

⁹⁰ Pursuant to Article 18 of the REMIT Regulation.

⁹¹ Administrative financial penalties provided for in Article 56 para. 1 items 39-42 and item 43 of the Energy Law Act.

⁹² Criminal sanctions provided for in Articles 57a-57f of the Energy Law Act.

consultations with ACER and PPATs, as well as cooperation with other national regulatory authorities in the EU in cross-border cases.

In 2025, the President of URE analysed a total of 20 such cases (13 of an exclusively domestic nature and seven of a cross-border nature), three of which were concluded during the reporting period. Nine cases were reported through the online platform dedicated to reporting breaches of the REMIT Regulation (Notification Platform) maintained by ACER, including four by foreign PPATs, two by Polish PPATs, and three by foreign market participants or foreign natural persons. Out of the 20 aforementioned cases, nine cases were reported by Polish PPATs pursuant to Article 15 of the REMIT Regulation, including two in 2025.

Of the cases received in 2025, two were submitted by domestic and foreign natural persons, one by a foreign market participant, one by a foreign PPAT, and two by Polish PPATs.

Regardless of the above, in 2025, within limited resources, the President of URE also conducted, according to own criteria, monitoring of the trading activity of wholesale energy market participants for potential breaches of Article 5 of the REMIT Regulation on selected energy products traded on TGE S.A.

Notifications of a suspected crime

In 2025, the President of URE did not submit any notification of a suspected crime for breaches of the REMIT Regulation. In February and April 2025, the prosecutor approved two decisions to discontinue investigations conducted as a result of the President of URE submitting two notifications, in January 2023 and November 2024 respectively, of a suspected crime specified in Article 57a of the Energy Law Act (that is, market manipulation / attempted market manipulation).

In March and May 2025, respectively, the President of URE filed interlocutory appeals against the aforementioned decisions of the prosecutor. By a decision of September 2025, the District Court for Warszawa-Śródmieście in Warsaw – 2nd Criminal Division upheld the prosecutor's decision of April 2025, which had been appealed by the President of URE in May 2025. On the other hand, until the end of 2025, the court had not made a decision regarding the prosecutor's decision of February 2025, which was appealed by the President of URE in March 2025.

In September 2025, the President of URE received a notification from the District Prosecution Office in Warsaw regarding the submission of an indictment to the court in a case initiated by the President of URE filing a notification in December 2018 of a suspected crime specified in Article 57a of the Energy Law Act.

3.2.2. Retail market

At the end of 2025, electricity customers with a total of 19,531,524 energy consumption points (ECP) were connected to the national electricity system, of which 16,624,091 (85%) were ECP of consumers purchasing energy for household consumption (data based on electricity DSOs survey conducted by the President of URE). The remaining group of final customers are customers belonging to tariff groups A, B and C. Groups A and B consist of consumers supplied from high and medium voltage grids and are the so-called industrial consumers, while group C includes consumers connected to the low voltage grid, consuming electricity for business purposes, the so-called business consumers. Electricity customers have the right to receive electricity in an uninterrupted and reliable manner from the electricity supplier of their choice.

Table 14. Number of consumers connected to the distribution network as at 31 December 2025, broken down by tariff groups

Tariff group	A	B	C	G		TOTAL
				total	including households	
Number of ECP	1 138	56 477	1 637 467	17 836 442	16 624 091	19 531 524

Source: URE's own analysis on the basis of a one-time annual DSOs survey.

In the retail electricity market, there were five large electricity DSOs subject to the obligation of legal unbundling, whose networks are directly connected to the transmission network, and 187 undertakings designated as DSOs. In the case of DSOs operating within the structures of vertically integrated enterprises, accounting and bookkeeping separation is required by law, as well as the obligation to separate the distribution activity conducted by the system operator from other activities not related to electricity distribution – organisational unbundling.

The supply side of the retail energy market consists of energy suppliers offering the commodity to final customers. This group includes six suppliers operating within groups, jointly with distribution system operators, but as separate legal entities. The second group consists of suppliers in entities that are also distribution system operators and the third is independent electricity suppliers – entities not related to distribution activity in Poland.

As explained above in Part 3.1.3, with regard to institutional consumers, suppliers are not obliged to submit electricity tariffs to the President of URE for approval, while tariffs for households are approved only at the request of the default supplier and with regard to those customers who choose not to switch their supplier (sales under public obligation). However, default suppliers may – in addition to selling energy using the prices and rates specified in the tariff – present a market offer with a freely shaped price to all consumers, including all consumers in households. In the case of household consumers connected to the network of the operator on whose territory the supplier perform the tasks of a default supplier, the choice of tariff or market offer depends on the consumer. In 2025, electricity prices for households remained frozen under the amended Emergency Measures Act⁹³.

3.2.2.1. Monitoring the level of prices, the level of transparency, the level and effectiveness of market opening and competition

All electricity suppliers selling electricity to final customers are legally obliged to publish on their websites and make information on electricity sales and terms and conditions of their application publicly available in their premises. In case of large industrial/commercial consumers, offers are usually presented individually by supplying companies. Prices and other terms and conditions of the agreement are each time negotiated with the contractor and are different, depending on delivery time, volume and firmness of off-take.

Average electricity prices in 2025, broken down by consumption criterion, are presented in the table below.

Table 15. Number of customers, volume, value and average electricity prices applied to final customers depending on the consumption criterion in 2025

Consumption criterion	Number of customers	Volume [MWh]	Value [PLN thous.]	Average price [PLN/MWh]
< 50 MWh	19 196 451	44 264 493	25 019 886	565.24
50 – 2 000 MWh	30 907	25 742 164	14 196 279	551.48
> 2 000 MWh	933	23 900 041	11 690 506	489.14
Total	19 228 291	93 906 698	50 906 671	542.10

Source: Based on quarterly surveys from the six largest suppliers: PGE Obrót S.A., Energa Obrót S.A., ENEA S.A., E.ON Polska S.A., TAURON Sprzedaż sp. z o.o. and TAURON Sprzedaż GZE sp. z o.o.

In 2025, compared to 2024, a further increase (by 3.08%) was recorded in the number of consumers consuming less than 50 MWh of energy per year, including households, while at the same time the volume of electricity sold in this group of consumers decreased (by 0.32%). The average sales price of electricity in this group increased from 530.31 PLN/MWh to 565.24 PLN/MWh, that is by 6.59%.

⁹³ Act of 27 October 2022 amending the Act on Emergency Measures to Limit Electricity Prices and Support for Certain Customers in 2023–2025 and Certain Other Acts (Journal of Laws of 2024, item 1831, as amended).

As a result, the value of sales increased in this group, while it decreased in the remaining two groups – by 17.06% in the group of medium customers and by 14.83% in the group of the largest customers. This was related to a decrease in the average prices for these two groups of consumers. The total average price for all categories of consumers decreased in 2025, compared to 2024, by 2.8%.

The table below presents data on electricity prices and distribution fees in the fourth quarter of 2024 and 2025 for consumers with comprehensive contracts. A decrease in total average energy prices in the fourth quarter of 2025 was recorded only in the group of the largest consumers, namely in tariff groups A (decrease by 2.14%) and B (decrease by 7.63%). In 2025, electricity prices for households remained frozen.

Table 16. Electricity prices and distribution fees applicable to consumers with comprehensive contracts

Specification	Q IV 2024			Q IV 2025		
	Average sales price	including:		Average sales price	including:	
		Electricity fee	Distribution fee		Electricity fee	Distribution fee
	[PLN/MWh]					
Customers in total	952.30	560.60	391.60	1 012.44	573.30	439.14
of which: consumers on HV (group A)	652.60	537.20	115.40	638.63	494.82	143.81
consumers on MV (group B)	995.40	655.00	340.30	919.44	564.61	354.83
consumers on LV (group C)	1 333.20	747.10	586.10	1 411.59	790.71	620.88
consumers of group G	849.70	475.90	373.80	959.89	526.49	433.40
of which: households	871.60	486.10	385.60	986.22	543.32	442.90

Source: URE on the basis of data from the Ministry of Climate and Environment.

The average total price for all consumer groups in the fourth quarter of 2025 stood above the price level of the fourth quarter of 2024 (an increase of 6.32%), while fees for electricity as a commodity increased by 2.27%. The average increase in the distribution fee on a quarter-on-quarter basis amounted to slightly over 12.14%. In the group of the largest institutional consumers purchasing electricity from the high-voltage grid (tariff groups A and B), a decrease in electricity charges was recorded (by 7.89% in group A and 13.80% in group B), accompanied by an increase in distribution fees (by 24.6% in group A and 4.27% in group B), which resulted in a lower total sales price of electricity delivered (by 2.14% in group A and 7.63% in group B). In the group of the remaining consumers (tariff groups C and G), the price of electricity as a commodity increased (by 5.84% in group C and 10.63% in group G), while the increase in distribution fees reached 5.93% in group C and as much as 15.94% in group G. The final cost of electricity supply (commodity with distribution service) was lower by 7.63% for medium-voltage consumers (tariff group B), but increased by 5.88% for institutional consumers taking electricity from the low-voltage grid (tariff group C) and by 12.97% for tariff group G. In households, a simultaneous increase was recorded in electricity fees (by 11.77%) and distribution costs (by 14.86%), which translated into an over 13% increase in the total cost of energy supply in the fourth quarter of 2025, compared to the fourth quarter of 2024.

The year 2025 was the year in which the electricity price freeze for households was expected to end, which occurred on 31 December. The price decrease in tariff group A may indicate a relatively strong link between these prices and wholesale market prices.

Dynamic price contracts

A dynamic price contract is a free-market electricity supply contract in which the price reflects price fluctuations in the energy market, in particular the day-ahead and intraday markets, at intervals equal to at least the imbalance settlement period (amounting to 15 minutes).

Since 24 August 2024, the obligation to offer dynamic price contracts has applied to all electricity suppliers serving at least 200,000 final customers. Smaller suppliers also have the right to feature such an offer.

On 29 May 2026, the President of URE published the latest report on the monitoring of the conclusion and application of dynamic price contracts⁹⁴, which covers the year 2025. The 2025 report is the first one to cover a full year of the application of dynamic price contracts. The previous one, presenting the situation in 2024, covered the period from 24 August to 31 December of that year (the period during which the obligation was in force).

At the end of 2025, dynamic price contracts for households were offered by nine suppliers, who presented 10 offers, nine of which were available nationwide, and one (E.ON Polska S.A.) exclusively for consumers connected to the Stoen Operator network. In turn, the number of suppliers providing dynamic price offers for micro-enterprises increased over the past year from 20 to 24, and the number of available offers grew from 27 to 36.

Table 17. Number of suppliers and electricity sales offers in dynamic price contracts

Status as at	Number of suppliers		Number of offers	
	31.12.2024	31.12.2025	31.12.2024	31.12.2025
For households	9	10	9	10
For micro-enterprises	20	24	27	36

Source: Own analysis based on data submitted by suppliers to the URE energy price comparison tool.

In the household segment, a significant increase in the number of consumers using dynamic price contracts was recorded during 2025, growing from 135 to 4,836, which represents a year-on-year increase of nearly 3.5 thousand %. At the same time, the share of dynamic price contracts in the entire household segment remained negligible and did not exceed 0.03% of consumers, who consumed only 0.05% of the energy supplied to this group.

Table 18. Development of the dynamic price contract segment at the end of 2025

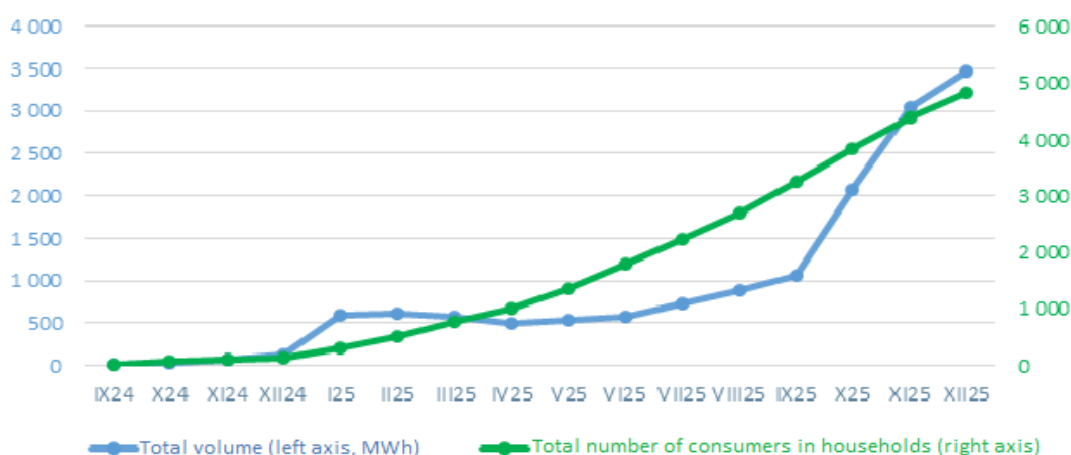
Status as at	Number of consumers (acc. to ECP)			Annual volume [MWh]		
	31.12.2024	31.12.2025	increase	31.12.2024	31.12.2025	increase
households	135	4 836	3 482%	117	3 479	2 878%
group C and G w/o households	24 122	27 114	12.5%	861 062	1 492 585	73.3%

Source: URE's own analysis based on one-time annual survey of trading companies.

The dynamic growth in the household group is mainly driven by alternative suppliers which are not legally obliged to offer dynamic price contracts. At the end of 2025, as many as 4,503 contracts in this group (93%) were concluded with alternative suppliers.

⁹⁴ <https://www.ure.gov.pl/pl/urzed/informacje-ogolne/edukacja-i-komunikacja/publikacje/raport-z-monitorowania-zawiera/12685,Raport-z-monitorowania-zawierania-i-stosowania-umow-z-cenami-dynamicznymi.html>

Figure 16. Size of the dynamic price contract segment among household consumers between September 2024 and December 2025.

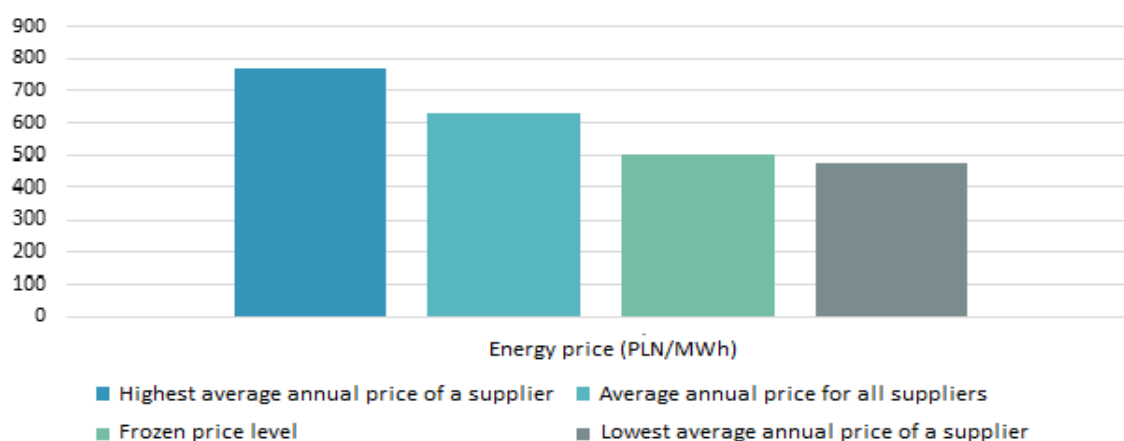


Source: URE based on one-time survey of electricity suppliers.

In the segment comprising small and micro-enterprises (tariff groups C and G, excluding households), the number of dynamic price contracts increased by 12.5% in 2025 and amounted to 27,000 at the end of the same year. This represented 1.1% of customers in these tariff groups, who accounted for 5.5% of electricity consumption within their respective groups.

In 2025, a maximum price of 500 PLN/MWh net continued to apply to household customers, and choosing a dynamic price contract meant opting out of this protection mechanism. The price spread among individual suppliers was high. The highest volume-weighted average annual price achieved by customers of a specific supplier amounted to 769 PLN/MWh, while the lowest was 476 PLN/MWh. Customers of four out of ten suppliers achieved an average annual price below the “frozen price” level of 500 PLN/MWh. The large differences in the average price levels resulted mainly from variations in the customers' average consumption profiles.

Figure 17. Dynamic price contracts – average price spread among individual suppliers in 2025



Source: URE based on one-time survey of electricity suppliers.

Supplier switching

Data obtained by the President of URE from electricity DSOs indicates that in 2025, the number of consumers which have ever exercised their right to choose a supplier increased by 7% compared to 2024, with this change reaching as much as 14.93% in the institutional consumer group (tariff groups A, B, and C), while in tariff group G (including households), the increase amounted to 3.99%.

The total volume of electricity delivered to final customers on market terms in 2025, that is after exercising the TPA rule, amounted to 82,253,931 MWh. Compared to 2024, the volume of energy delivered to consumers exercising their right to choose a supplier decreased slightly – by 0.68 TWh. The share of energy delivered to such final customers in the total volume of energy delivered decreased in 2025 to 52.30% from 55.51% in the previous year.

The growing number of TPA consumers (on a cumulative basis) does not indicate intensified market development in a given year, particularly in the institutional consumer segment. In order to formulate an assessment in this regard, the President of URE calculates the TPA indicator for individual years, defined as the ratio of the number of supplier switches to the total number of consumers. In 2025, this indicator decreased compared to 2024 and reached 0.17% (in 2024, it amounted to 0.24%). The TPA indicator remains at a low level, the reasons for which can be attributed to the electricity price freeze for households, which continued into 2025.

As at 31 December 2025, 59.98% of household customers purchased electricity based on contracts with an approved tariff, compared to 62.42% at the end of 2024 (a decrease of 2.44 percentage points). The remaining consumers purchased electricity at prices resulting from market offers.

Wholesale vs. retail electricity prices for households

Since 2024, the President of URE has been monitoring the ratio of retail electricity prices for households to wholesale prices, pursuant to the provisions of Article 23 para. 2 item 18b section e of the Energy Law Act. As a measure of wholesale price levels, the President of URE adopts the weighted average price of futures contracts for the analysed year. For the year 2025, these were the BASE-Y-25 and PEAK5-Y-25 contracts, which were traded until the end of 2024. The weighted average price over the entire trading period amounted to 488.09 PLN/MWh for the BASE-Y-25 instrument and 488.14 PLN/MWh for the PEAK5-Y-25 instrument.

Due to the entry into force of the provisions on the “freezing” of electricity sales prices for households, the maximum price for this consumer group last year amounted to 500 PLN/MWh. The frozen price was higher by 2.44% than the average price of the BASE-Y-25 instrument and by 2.43% than the average price of the PEAK5-Y-25 instrument. Based on the annual survey of trading companies, the President of URE further determined the actual average price of electricity (volume-weighted) sold to households in 2025. This price stood at 496.98 PLN/MWh and was higher by 1.82% than the average price of the BASE-Y-25 instrument and by 1.81% than the average price of the PEAK5-Y-25 instrument. The table below presents a comparison of data regarding the relationship between wholesale and retail prices in 2025 and the previous year.

Table 19. Wholesale vs. retail electricity price ratio in 2025 and 2024

Year	Wholesale price indicators		„Frozen” price	Retail/wholesale ratio	Average actual price	Retail/wholesale ratio
	name	value [PLN/MWh]	value [PLN/MWh]	[%]	value [PLN/MWh]	[%]
2024	BASE-Y-24	663.67	500*	-24.66	462.67	-30.29
	PEAK5-Y-24	775.19	500*	-35.50	462.67	-40.32
2025	BASE-Y-25	488.09	500**	+2.44	496.98	+1.82
	PEAK5-Y-25	488.14	500**	+2.43	496.98	+1.81

* Price applicable in II half 2024.

** Price applicable in 2025.

Source: URE based on one-time survey of electricity suppliers and data of TGE S.A.

The table above shows that in 2025, the relationship between retail and wholesale electricity prices for households reversed – retail prices were a few percent higher than the wholesale price indicators,

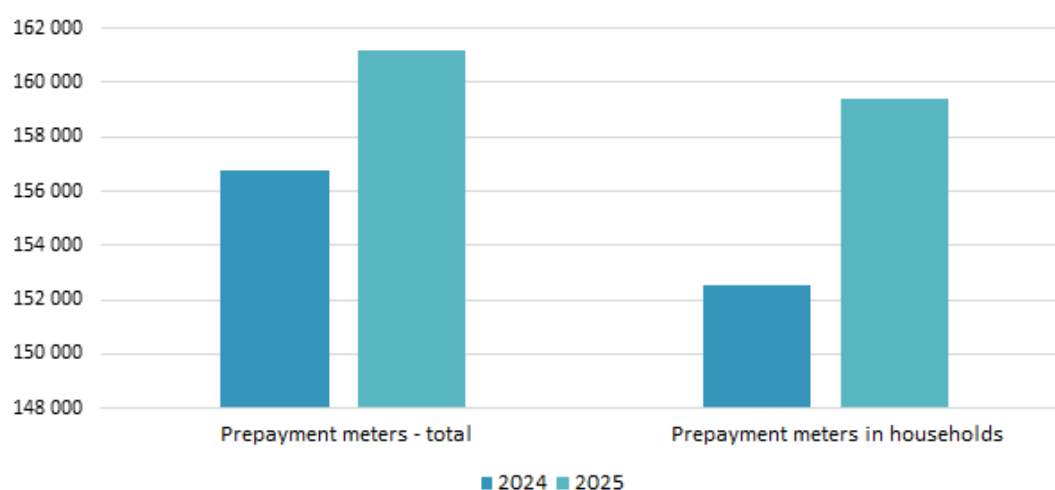
whereas in 2024, they were several dozen percent lower than wholesale prices. The normalisation of the situation in the electricity market resulted from a decrease in wholesale prices in 2025 and allowed for the phasing out of the price freeze for households as of 1 January 2026.

Prepayment meters

With a prepaid metering and billing system, the supply of electricity is started after a portion of the energy has been paid in advance. The consumer (usually a household) decides on the use of electricity and also pays a fixed charge, regardless of whether electricity is consumed by the consumer. An application for the installation of a prepayment metering system can be made by a vulnerable electricity consumer and the operator is then obliged to install such a meter at its own expense. Such an application may also be submitted by other household electricity consumers, but in such a case it is the consumer who is obliged to cover the cost of its installation. In addition, a prepayment meter can be installed at the initiative of the energy company in a situation where the consumer: has been in default of payment for electricity consumed or services rendered for a period of at least one month within 12 consecutive months, does not have a legal title to the property, facility or premises to which the electricity is supplied and where the consumer uses the property, facility or premises in a manner which makes it impossible to regularly check the status of the metering and billing system. In such a case, the costs of installing a prepayment metering system shall also be borne by the operator, and if the customer does not agree to the installation of a prepayment meter, the electricity DSO may suspend the supply of electricity or terminate the contract.

Furthermore, the installation of a prepaid metering and billing system at the operator's expense is possible in a situation where the consumer applies for the initiation of proceedings before the Negotiation Coordinator acting at the President of URE in respect of the consideration of a dispute concerning the supply of electricity or applies for resolution by the President of URE of a dispute that is within the competence of that body⁹⁵. According to data from a one-time annual survey, there were 161,193 prepayment meters installed in the Polish power system at the end of 2025, compared to 156,729 a year earlier (an increase of 2.85%); of these, 159,426 such meters were installed for household customers, compared to 152,510 at the end of 2024 (an increase of 4.53%).

Figure 18. Number of prepayment meters installed as at the end of the year



Source: URE based on one-time survey of electricity suppliers.

⁹⁵ Pursuant to Article 6e of the Energy Law Act.

Suspensions of electricity supplies

In 2025, electricity supply was discontinued to 220,635 customers (by ECP), and this number was 22% higher compared to 2024. The ECP affected by the supply discontinuation accounted for 1.13% of the total number of ECP (an increase of 0.19 percentage points compared to the previous year).

Households accounted for 72.1% of the energy supply suspension cases, representing a decrease of 1.3 percentage points compared to 2024. Similar to the previous year, the cause of nearly all these events (98.67% overall and 98.66% in the household group) was the failure to make timely payments for the electricity consumed.

Restrictive contractual practices

Fulfilling the obligation resulting from Article 23 para. 2 item 18b section i of the Energy Law Act, the President of URE monitors the occurrence of restrictive contractual practices, including exclusivity clauses that may prevent customers from simultaneously concluding contracts with more than one supplier or restrict their choice in this regard, and, where deemed necessary, notifies the President of UOKiK of such practices.

Continuing the activities initiated in 2024, the President of URE monitored the occurrence of the restrictive contractual practices referred to above in 2025. The monitoring covered eight energy enterprises engaged in the sale of electricity, serving over 34,000 ECP, which had not been included in the 2024 monitoring. The draft and model contracts presented by individual energy suppliers and applied by them to consumers were subject to verification. The conducted monitoring did not reveal any provisions containing exclusivity clauses in the presented contracts. Furthermore, in 2025, the President of URE did not receive any complaints or other signals regarding the occurrence of such practices.

Regardless of the above, URE also received complaints regarding unfair market practices of electricity suppliers. Bearing in mind the competences of the President of URE and the fact that the regulator does not possess direct competences to conduct antitrust proceedings and impose penalties for practices restricting competition, these matters were forwarded to the President of UOKiK in accordance with the substantive jurisdiction, while simultaneously providing customers with information on their rights. However, the number of such cases constituted a small percentage of all processed matters.

Support for vulnerable consumers

In Poland, the vulnerable consumer protection system⁹⁶ is linked to the social welfare system. The financial support system provides for payment of energy allowances by municipalities to vulnerable consumers who were granted housing allowance (electricity consumers) or a lump sum for the purchase of fuel (gaseous fuels consumers) and who are, respectively, a party to a comprehensive contract or contract on supply of electricity or gaseous fuels, and reside in the place of supplying this energy or fuels. Regardless of the energy allowance, a vulnerable consumer at risk of supply suspension due to payment arrears may submit an application to the supplier for additional support tools regarding current and overdue electricity liabilities. These include, for instance: deferral of the payment deadline, payment of debt in instalments, partial debt write-off or waiver of interest charges, and temporary suspension of debt enforcement.

⁹⁶ Pursuant to the wording of Article 3 item 13c, a vulnerable consumer is a person who has been granted a housing allowance within the meaning of Article 2 para. 1 of the Act of 21 June 2001 on Housing Allowances (Journal of Laws of 2023, item 1335), who is a party to a comprehensive contract or an electricity supply contract concluded with an energy enterprise and resides at the place of electricity supply.

Due to the vulnerable consumer support model adopted in Poland, the Regulator has not been equipped with pricing tools to protect this category of consumers.

On the other hand, energy poverty is defined as a situation in which a household cannot ensure a sufficient level of heat, cooling, and electricity to power appliances and to light a flat or a single-family building where no economic activity is conducted, provided that this is caused by high energy prices and the household collectively achieves low income, incurs high expenditures for energy purposes, and occupies a premises or building with low energy efficiency. The amendment to the provisions of the Energy Law Act specifying the criteria for recognising a household as being at risk of energy poverty was introduced only in 2026.

Ensuring access to data on energy consumption by customers

Pursuant to the provisions of the Energy Law Act, electricity suppliers are obliged to inform their customers about the amount of electricity consumed by these customers in the previous year and about the place where information about the average consumption of electricity for a given tariff group which these customers used is available, as well as about energy efficiency improvement measures and energy-efficient technical equipment.

In addition, an energy company providing an energy distribution service or an energy supplier which provides a comprehensive service, when issuing a clearing invoice to the consumer, should provide information on, among others, the following, in a billing attached to the invoice:

- the volume of electricity consumption in the settlement period on the basis of which the amount due was calculated,
- the method of reading the metering and billing system, whether it was a physical or remote reading made by an authorised representative of the energy company or a reading made and reported by the customer,
- the method of determining the volume of electricity consumption in a situation where the settlement period is longer than a month and when the first or last day of the settlement period does not coincide with the dates of readings of the metering and billing system, or when during the settlement period there has been a change in prices or fee rates, or about the place where this information is available,
- permissible time of interruptions in the supply of electricity.

In addition, the energy company has an obligation to provide free of charge information on the principles of settlements, current tariffs and provides the customer with the possibility of access to information on settlements made in electronic form, as well as to electronic invoices.

Electricity price comparison tool

In connection with the obligation of the President of URE to maintain an electricity supply offers comparison tool for household consumers and micro-enterprises with an expected annual consumption below 100,000 kWh, the President of URE has been providing an Excel spreadsheet on the Office's website since 2024⁹⁷, presenting the supply offers available on the market. The specification includes market (unregulated) offers with fixed prices (single- and multi-zone), indexed prices, and dynamic price offers. The specification for households also takes into account the tariff offers of default suppliers, whose prices and rates have been approved by the President of URE. Users are provided with the option to search and sort offers by all relevant criteria, such as the supplier's name, type of offer, area and period of its validity, energy prices, notice period of the contract, or the amount of penalties for its early termination. The comparison engine does not contain

⁹⁷ <https://maszwybor.ure.gov.pl/or/cenki/122,Zestawienie-ofert-sprzedawcow-energii-elektrycznej.html>

information on distribution rates resulting from approved tariffs. Information on current distribution rates can be found in the electricity distribution tariffs approved by the President of URE⁹⁸.

The current status of the offers in the specification is ensured by the obligation under the provisions of the Energy Law Act for energy suppliers to submit to the President of URE information on any amendment to an energy supply offer or its withdrawal, as well as on the introduction of a new offer (prior to the planned introduction of the offer amendment), as well as each time upon the request of the President of URE. As information on suppliers' offers, offer amendments, or their withdrawal flows in, the President of URE updates the published compilations on a weekly basis. In 2025, there were 40 updates to the specification for households and 36 updates to the specification for micro-enterprises.

Regardless of fulfilling the obligation to make public the electricity supply offers targeted at the indicated group of customers, the President of URE continues efforts to acquire a more technologically advanced price comparison tool. In 2025, conceptual work on the new system was underway.

The number of suppliers whose offers of a selected type were presented in the existing comparison engine, as well as the total number of offers of a given type, broken down by customer groups as of the end of 2025, are presented in the table below.

Table 20. Number of suppliers providing offers in the comparison tool as at 31 December 2025

Consumer type	Offer type ⁹⁹		
	Fixed prices	Dynamic prices	Other
Households	54	9	7
Micro-enterprises	129	23	15

Source: URE.

Compared to the end of 2024, the number of suppliers presenting their offers for both consumer groups underwent only minor changes, which may indicate the widespread use of this tool by energy suppliers since 2024, in accordance with applicable law.

Many suppliers present more than one offer for each consumer type. The number of offers presented at the end of 2025 for household consumers changed slightly compared to the end of 2024, whereas in the specification of offers for micro-enterprises, a nearly 16% increase in the number of fixed-price offers and an over 33% increase in the number of dynamic price offers were recorded.

Table 21. Number of offers presented in the comparison engine as at 31 December 2025

Consumer type	Offer type ¹⁰⁰		
	Fixed prices	Dynamic prices	Other
Households	361	10	23
Micro-enterprises	449	36	45

Source: URE.

⁹⁸ Electricity distribution tariffs are available on the URE website at: <https://bip.ure.gov.pl/bip/taryfy-i-inne-decyzje-b/energia-elektryczna>

⁹⁹ The category of fixed-price offers also includes time-of-use offers (with a fixed price within a given time zone), whereas the category of dynamic price offers includes offers compliant with the definition under Article 3 item 6d of the Energy Law Act.

¹⁰⁰ The category of fixed-price offers also includes time-of-use offers (with a fixed price within a given time zone), whereas the category of dynamic price offers includes offers compliant with the definition under Article 3 item 6d of the Energy Law Act.

Citizen energy communities (CEC)

CECs are based on voluntary and open participation. They may operate in the form of a cooperative, a housing cooperative, a housing association, an association (excluding ordinary associations), a partnership (excluding a professional partnership), or a farmers' cooperative. Depending on the legal form, the members or partners of a CEC may be natural persons, local government units, micro-enterprises, or small enterprises. The primary objective of a citizen energy community is to provide environmental, economic, or social benefits for its members, partners, or the areas where the community will operate.

The activity of a citizen energy community may include the generation, distribution, supply, consumption, aggregation, or storage of energy, as well as providing energy efficiency services, electric vehicle charging services, or providing other energy services to its members or shareholders. At the same time, a customer joining a citizen energy community retains full consumer rights.

The entry is made upon the application of a citizen energy community. In order to facilitate the submission of such an application for entry into the registry of citizen energy communities by interested entities, URE developed a template for the registry entry application along with appendices and a detailed information package, and published them in the Public Information Bulletin of URE¹⁰¹.

In the course of the registry entry proceedings, the President of URE verifies the application in terms of the accuracy and correctness of the submitted data, as well as the statute or agreement of the citizen energy community in terms of its compliance with the objective and scope of activity. The President of URE may refuse, by means of a decision, to enter a citizen energy community into the registry if: a final court ruling has been issued prohibiting the applicant from performing the activity covered by the entry, the application submitted is inconsistent with the actual facts, or the statute or agreement of the citizen energy community is non-compliant with the objective and scope of activity. In cases specified in the Act, the President of URE removes a citizen energy community from the registry.

The President of URE maintains an electronic registry of citizen energy communities, which is published in the Public Information Bulletin of URE¹⁰².

3.2.2.2. Consumer protection and dispute settlement

Monitoring of claims and complaints lodged by household customers to energy companies

The President of URE conducted monitoring of complaints and claims submitted by household electricity consumers to energy companies. The total number of complaints and claims increased in 2025 compared to the previous year and remains at a high level. In 2025, 2.07% of all household customers and 2.86% of prosumers filed a complaint (a slight decrease compared to 2024). The main subject of complaints and claims (over 49% of submissions from all customers and over 58% of submissions from prosumers) involved billing and debt recovery issues.

The data collected during the monitoring will be used for a quantitative and qualitative analysis of the categories of customer notifications received by URE. This will allow for a two-dimensional assessment of the enterprises – their efficiency in customer service processes, the identification of procedures, the scale and repeatability of problems, as well as customer relations.

¹⁰¹ <https://bip.ure.gov.pl/bip/rejstry-i-bazy/wykaz-obywatelskich-spolecznos/4707,Wykaz-obywatelskich-spolecznosci-energetycznych.html>

¹⁰² <https://bip.ure.gov.pl/bip/rejstry-i-bazy/wykaz-obywatelskich-spolecznos/4707,Wykaz-obywatelskich-spolecznosci-energetycznych.html>

Complaint handling

Complaints against energy enterprises lodged to the President of URE by household electricity consumers are processed by individual organisational units of URE (depending on the subject of the complaint, by both departments and regional offices). The range of issues raised by consumers in 2025 was very broad, and the complaints were frequently multi-faceted. The President of URE undertook actions aimed at clarifying the issues covered by the submitted complaints, which concerned, among others, such areas as:

- connection to the grid: consumers' complaints in this category mainly concerned the performance of the grid connection contracts and processing applications for connection terms and conditions,
- metering: consumers reported problems with the operation of measuring and billing systems, which directly affected the settlements and amounts due on invoices,
- quality of supply: consumers complained about the failure to meet quality parameters; a majority of these complaints were filed by prosumers who complained about the incorrect value of the voltage in the grid and related problems with the operation of the PV micro-installations,
- unfair commercial practices: consumers reported the actions of electricity sellers, these reports concerned misleading contracting,
- contracts and sales: complaints reported by consumers in this category mainly concerned the performance of contracts, amendments to contracts, problems with contract termination and penalty charges. Consumers also reported irregularities related to the contracting process,
- starting supply or resumption of supply after interruption: the complaints filed by consumers in this category mainly concerned resumption of supply after interruption and the fee for resumption of supply,
- suspension of supplies due to non- or late payment: in this category, consumers complained about the companies' failure to comply with the procedure of suspension of supply, in particular the failure to inform the household customer of their intention to suspend supply,
- invoices/bills issued and debt recovery: complaints in this category concerned the ambiguous content of invoices, correctness of settlement, level of forecasts, basis for invoice adjustment and timeliness of their issuing,
- price/tariff: consumers complained about wrong tariff group qualification and complained about electricity prices and rates, part of complaints in this category concerned ambiguities around the interpretation and application of statutory instruments affecting prices and fee rates and their changes,
- compensation: consumers asked for help in getting discounts and compensation from energy companies,
- supplier switching: consumers complained about problems with the entry into force of the new contract after the supplier switching and timeliness of settlements with the old supplier,
- customer service: in this category, complaints most often concerned the timeliness of response to complaints, delay in the execution of orders and instructions submitted by consumers or problems with establishing telephone contact with the energy company (complaints made by phone),
- microgeneration/prosumption: the notifications from prosumers mainly concerned problems related to grid connection, contract conclusion and settlement. Prosumers also reported problems with electricity parameters.

Table 22. Complaints against energy companies (suppliers and distribution system operators) submitted to the President of URE by electricity consumers in households (including prosumers)

Type of complaint	Number
Grid connection	285
Metering	165
Quality of supply	413
Unfair commercial practices	13

Type of complaint	Number
Contracts and sales	394
Starting supply or resumption of supply after interruption	27
Suspension of supplies due to non-payment or late payment	148
Invoicing/billing and debt recovery	887
Price/tariff	291
Compensation	29
Supplier switching	43
Customer service	254
Microgeneration/prosumption	471
Other	223

Source: URE.

4. NATURAL GAS MARKET

4.1. NETWORK REGULATION

4.1.1. Network and LNG tariffs for connection and access

Gas enterprises with licences for the transmission, distribution, storage of gaseous fuels, natural gas liquefaction or regasification of liquefied natural gas conduct the above-mentioned activities based on tariffs approved by the President of URE. A prerequisite for the approval of the tariff is its compliance with the provisions of the Energy Law Act and the executive acts to this Act, including in particular the Ordinance on the Detailed Rules for Shaping and Calculation of Tariffs and Settlements in the Gaseous Fuel Trade. In the tariff approval administrative proceedings, the President of URE thoroughly analyses the costs which form the basis for calculating the rates of fees, ensuring that there are no cross-subsidies between the licensed and non-licensed activities and between the various types of licensed activities. The basis for the assessment of costs accepted for the calculation of tariffs are the data included in the financial statements. Due to the structure of the Polish gas sector, comparative analyses are used to a limited extent. Tariffs approved by the President of URE are published in the URE Bulletin within 14 days of the date of approval. Except for tariffs regarding transmission of gaseous fuels, to which the TAR NC applies, gas companies introduce tariffs for application not earlier than after 14 days and not later than 45 days of the date of their publication, while energy companies engaged in the transmission of gaseous fuels introduce the tariff for application within the deadline set by the President of URE, not earlier than 14 days after publication in the URE Bulletin. Tariffs regarding transmission of gaseous fuels are published not later than 30 days before the annual procedure of annual capacity auction.

The decision of the President of URE approving or refusing to approve the company's tariff may be appealed from to the District Court in Warsaw – the Competition and Consumer Protection Court, via the President of URE, within two weeks of the date of its delivery.

Enterprises engaged in the transmission or distribution of gaseous fuels are obliged to conclude a network connection agreement with entities applying for connection, on the basis of equal treatment, provided that technical and economic conditions for connection and supply of these fuels exist, and the party requesting the conclusion of the agreement meets the conditions for network connection and take-off.

A fee is charged for connection to the gas transmission network in the amount corresponding to the actual expenses incurred for the implementation of the connection.

On the other hand, final customers whose devices, installations and networks are connected to distribution networks (low, medium, higher and high-pressure), pay a fee determined on the basis of rates calculated by the distribution network operators and contained in their tariffs approved by the President of URE. These rates shall be calculated on the basis of $\frac{1}{4}$ of the annual average investment expenditure for the construction of the sections serving to connect these entities, as defined in the development plan drawn up by the distribution system operator. In the case of connecting sources cooperating with the grid and the networks of energy companies involved in the transmission or distribution of gaseous fuels, a fee is charged based on the actual expenditure incurred for the implementation of the connection.

Key energy infrastructure companies in the gas sector include:

- OGP GAZ-SYSTEM S.A., acting as the operator of:
 - the transmission system on its own network and the network of gas pipelines belonging to SGT EuRoPol Gaz S.A.;
 - the operator of the natural gas liquefaction and liquefied natural gas (LNG) regasification system,
- PSG Sp. z o.o. – gas distribution system operator,
- Gas Storage Poland Sp. z o.o. – gas storage system operator.

OGP GAZ-SYSTEM S.A. – tariff for the transmission of gaseous fuels through the company's own network

In 2025, the OGP GAZ-SYSTEM S.A.'s own network was subject to the Gas Transmission Tariff No. 18, approved by the President of URE by the decision of 3 June 2024 for the period from 6:00 am on 1 January 2025 to 6:00 am on 1 January 2026¹⁰³.

The basic assumptions for Tariff No. 18 are:

- the division of revenue into entry and exit points corresponds to the proportion of 45/55,
- rates of charges for transmission services have been set at the entry and exit points for:
 - E gas and
 - Lw gas,
- discount on entry from the liquefied natural gas regasification installation – 100%,
- discount on entries from storage facilities and on exits to these installations – 80%,
- for interruptible products, an ex-ante discount:
 - 6% on interconnections with EU countries and third countries;
 - 2% on interconnections;
 - 80% for virtual return services,
- non-transmission services offered:
 - compression (offered in a high-methane natural gas system, mainly to support the supply of natural gas from gas mines);
 - pressure reduction (at exits).

The calculation of Tariff No. 18 takes into account the provisions of the decision of the President of URE of 10 April 2024 approving the *Method of determining reference prices No. 3/OGP with respect to the own transmission network of the Operator Gazociągów Przesyłowych GAZ-SYSTEM S.A. for the period: from 6 am, 1 January 2025 to 6 am, 1 January 2027*, constituting an attachment to this decision¹⁰⁴ and *Information No. 4/2024 on the level of multipliers, seasonal factors and discounts referred to in Article 28(1)(a)-(c) of the Tariff Network Code, taken into account in the calculation of*

¹⁰³ URE Bulletin – Gaseous Fuels no. 62 (2859) – Tariffs published in 2024 - BIP gaseous fuels – Energy Regulatory Office.

¹⁰⁴ URE Bulletin – Gaseous Fuels no. 50 (2847) of 11 April 2024, Other decisions, information, reports published in 2024 – Other decisions, information, reports BIP – Energy Regulatory Office.

*tariffs for gaseous fuel transmission services for the period from 6 am, 1 January 2025 to 6 am, 1 January 2026*¹⁰⁵ issued on the basis of the provisions of the TAR NC.

The tariff for 2025 was approved within the deadline resulting from the provisions of Article 29 and Article 32(a) of the TAR NC. According to these regulations, the publication of, among others, transmission fee rates for the next gas year should take place no later than 30 days before the yearly auction for annual capacity. On the other hand, according to Article 11(4) of the CAM NC, the yearly auctions for annual capacity start on the first Monday of July each year.

By decision of 5 June 2025 the President of URE approved the Tariff No. 19 for the transmission of gaseous fuels for the period from 6:00 am on 1 January 2026 to 6:00 am on 1 January 2027.

The tariff established by OGP GAZ-SYSTEM S.A. ensured coverage of the planned costs along with a justified return on the capital employed. This tariff has been calculated in accordance with the requirements of the Gas Tariff Regulation and the TAR NC.

At the same time, with the aforementioned decision the regulatory account balance was reconciled as at 31 December 2024, in the amount of (-)PLN 290,966.22 thousand (under-recovered revenue). The tariff calculation for 2026 took into account a portion of the regulatory account balance amounting to (-)PLN 284,125.64 thousand (which was due to increasing the revenue for the calculation of transmission tariff rates). The remaining part of the regulatory balance will be taken into account in the tariff calculations for subsequent periods.

The calculation of the tariff takes into account the provisions of the decision of the President of URE of 10 April 2024 approving the *Method of determining reference prices No. 3/OGP with respect to the own transmission network of Operator Gazociągów Przesyłowych GAZ-SYSTEM S.A. for the period: from 6 am, 1 January 2025 to 6 am, 1 January 2027*, constituting an attachment to this decision¹⁰⁶ and *Information No. 9/2025 on the level of multipliers, seasonal factors and discounts referred to in Article 28(1)(a)-(c) of the Tariff Code, taken into account in the calculation of tariffs for gaseous fuel transmission services for the period from 6 am, 1 January 2026 to 6 am, 1 January 2027*¹⁰⁷, issued on the basis of the TAR NC.

Furthermore, the tariff calculation took into account the provisions of the decision of 6 March 2025, granting the gas TSO a derogation from the application of Article 18(4) of Regulation No. 2024/1789¹⁰⁸. As a result, in 2026, the gas TSO will not be obliged to grant discounts to natural gas transmission network users at interconnection points between EU Member States, in respect of capacity-based tariffs, for renewable gases (100%) and low-carbon gases (75%).

The tariff includes transmission fee rates (fixed rates in gr/kWh/h per h) for firm annual gaseous fuels transmission services provided at entry and exit points to/from the transmission system (for high-methane natural gas – group E and nitrogenous natural gas – group L, subgroup Lw), including for high-methane natural gas also at the entry points and exits from/to underground gas storage facilities.

In addition, non-transmission services were specified in the calculation of Tariff No. 19 (for 2026):

1. compression services (dedicated to cooperation with the natural gas extraction sector) and
2. pressure reduction services at exit points from the transmission system, where pressure reduction in the gas TSO's facilities is required.

¹⁰⁵ Multipliers, seasonal factors and discounts for 2025 – Article 28 of NC TAR Energy Regulatory Office

¹⁰⁶ URE Bulletin – Gaseous Fuels no. 50 (2847) of 11 April 2024, Other decisions, information, reports published in 2024 - Other decisions, information, reports BIP – Energy Regulatory Office

¹⁰⁷ <https://www.ure.gov.pl/pl/biznes/taryfy-zalozenia/mnozники-wspolczynniki-sezonow-1/12236,Mnozники-wspolczynniki-sezonowe-i-rabaty-na-2026-r-art-28-NC-TAR.html>

¹⁰⁸ <https://www.ure.gov.pl/pl/biznes/taryfy-zalozenia/decyzja-ws-odstepstwa-od-art-1/12546,Decyzja-ws-odstepstwa-od-art-184-rozporzadzenia-20241789.html>

In the tariff for 2026, the share of revenues obtained from fixed fees, both for high-methane and nitrogenous gas, was 100%. The distribution of revenue between entry and exit points adopted in the tariff calculation corresponds to a proportion of 45/55. Rates at entry and exit points to/from storage facilities have been established with an 80% discount, that is they amount to 20% of the transmission rates at entry and exit points to/from the high-methane natural gas transmission network other than storage facilities.

At the entry point to the transmission system from the LNG terminal, a 70% discount was applied in 2026¹⁰⁹.

The average rate for gas fuel transmission services, calculated according to Tariff No. 19, increased by 13.1% compared to the average rate under Tariff No. 18 (for contracted capacities and volumes planned for 2026).

Table 23. Fee rates for the provision of transmission services for annual products offered on a firm basis, for the tariff in force in 2025 (Tariff No. 18) and approved for 2026 (Tariff No. 19)

Physical entry points (E_{we} , L_{we}) / physical exit points (E_{wy} , L_{wy})	Fee rates [gr/(kWh/h)/h]		
	Tariff 18	Tariff 19	change [%] (T19/T18-1)
For users of E gas network			
E_{we}	0.7896	0.7709	-2.37
E_{wy}	0.3317	0.3808	14.80
E_{we} LNG	0.0000	0.2313	---
E_{we} PMG	0.1579	0.1542	-2.34
E_{wy} PMG	0.0663	0.0762	14.93
For users of Lw gas network			
L_{we}	0.2769	0.3196	15.42
L_{wy}	0.1765	0.2189	24.02

Source: URE.

OGP GAZ-SYSTEM S.A. – tariff for the transmission of gaseous fuels via the transmission network belonging to System Gazociągów Tranzytowych EuRoPol GAZ S.A.

In 2025, the tariff for the transmission of gaseous fuels of the Polish Section of the Yamal-Europe Transit Gas Pipeline System No. 1/2024, approved by the decision of the President of URE of 3 June 2024, for the period from 6 am, 1 January 2025 to 6 am, 1 January 2026, was applied.

The tariff for the transmission of gaseous fuels of the Polish Section of the Yamal-Europe Transit Gas Pipeline System No. 1/2026 was approved by the decision of the President of URE of 5 June 2025. The tariff rates (reference prices) were established for the period from 6:00 am, 1 January 2026 to 6:00 am, 1 January 2027.

The tariff for 2026 for the transmission network owned by SGT EuRoPol GAZ S.A. was developed on the basis of the *Method of determining reference prices No. 3/SGT with respect to the transmission network owned by System Gazociągów Tranzytowych SGT EuRoPol GAZ S.A. with its registered office in Warsaw for the period: from 6 am, 1 January 2025 to 6 am, 1 January 2027*¹¹⁰ and *Information No. 9/2025 on the level of multipliers, seasonal factors and discounts referred to in Article 28(1)(a)-(c)*

¹⁰⁹ <https://www.ure.gov.pl/pl/biznes/taryfy-zalozenia/mnozники-wspolczynniki-sezonow-1/12236,Mnozники-wspolczynniki-sezonowe-i-rabaty-na-2026-r-art-28-NC-TAR.html>

¹¹⁰ <https://www.ure.gov.pl/pl/biznes/taryfy-zalozenia/metody-wyznaczania-cen-referen-2/11809,Decyzja-Prezesa-URE-w-sprawie-metody-wyznaczania-cen-referencyjnych-stosowanej-w.html>

of the Tariff Code, taken into account in the calculation of tariffs for gaseous fuel transmission services for the period from 6 am, 1 January 2026 to 6 am, 1 January 2027¹¹¹.

Due to the complete cessation of natural gas flows from the Eastern direction, the following points are taken into account in the tariff calculation for gas transmission using the transmission system owned by SGT EuRoPol GAZ S.A. for 2026:

1. Mallnow-entry (firm service),
2. PWP-exit (firm service).

The split of revenue between entry and exit points adopted in the tariff calculation corresponds to a 50/50 proportion.

Table 24. Fee rates for the provision of transmission services for annual products offered on a firm basis, for the tariff in force in 2025 (Tariff 1/2025) and approved for 2026 (Tariff 1/2026)

Physical entry points (E_{en} , L_{en}) / physical exit points (E_{ex} , L_{ex})	Fee rates [gr/(kWh/h)/h]		
	Tariff 1/2025	Tariff 1/2026	change [%] (T1/2025)/(T1/2026)-1
E_{en}	1.2428	0.3603	-71.01
E_{ex}	1.2427	0.3604	-71.00

Source: URE.

Tariff of PSG sp. z o.o. for gaseous fuel distribution services

In 2025, this operator provided distribution services to over 7.6 million customers of:

1. E-gas,
2. Lw-gas,
3. Ls-gas,
4. coke oven gas.

In 2025, Tariff No. 13 for gas fuel distribution services, approved by the President of URE by a decision of 16 December 2024, for the period until 31 December 2025, was applied.

On 17 December 2025, Tariff No. 14 was approved for the period from 1 January 2026 to 31 December 2026.

The aforementioned decision also settled the regulatory account balance as at 31 December 2024, in the amount of PLN 452,179.97 thousand (under-recovered revenue). The tariff calculation took into account a portion of the regulatory account balance amounting to PLN 70,277.76 thousand, representing 15.5% of the regulatory account balance established as at 31 December 2024. The remaining part of the regulatory account balance will be taken into account in the tariff calculations for subsequent periods.

The tariff was introduced for application by the enterprise on 1 January 2026. As a result of the tariff approval, fees for gas fuel distribution services decreased by 1.67% for E-gas, 1.22% for Lw-gas, and 9.69% for Ls-gas. The significant deviation in fees for the Ls-gas distribution service results from the programme aimed at unifying fee rates across the enterprise's areas of operation. Connection fee rates for entities classified under connection group B were increased by 3%, that is, by the inflation rate for 2026. Provisions regarding the classification of customers into tariff groups in the event of a change in the type of fuel supplied were introduced into the wording of the tariff (item 1.14).

¹¹¹ <https://www.ure.gov.pl/pl/biznes/taryfy-zalozenia/mnozники-wspolczynniki-sezonow-1/12236,Mnozники-wspolczynniki-sezonowe-i-rabaty-na-2026-r-art-28-NC-TAR.html>

On 31 December 2025, a decision was issued to discontinue the administrative proceedings initiated upon the application of 10 June 2022, regarding the approval of the amendment to Tariff No. 10 for gaseous fuel distribution services, in the part concerning the addition of liquefied natural gas regasification services. The proceedings were discontinued due to the expiry of a three-year period, counting from the date of suspension of the proceedings, and during this period, none of the parties requested the resumption of the proceedings¹¹².

Tariff of Gas Storage Poland sp. z o.o. for the provision of gaseous fuel storage services

Until 31 July 2025, Tariff No. 1/2024 for gaseous fuel storage services, approved by the President of URE by a decision of 29 April 2024, as amended, was applied.

In 2025, three administrative proceedings regarding storage service tariffs were conducted. One of them concerned an amendment to the tariff approved in 2024. However, due to the expiry of the decision of the President of URE approving this tariff, the application for its amendment could not be substantively considered after that date. The objectively groundless nature of the proceedings resulted in the necessity to discontinue them (decision of 25 April 2025).

By a decision of 18 June 2025, the President of URE approved Tariff No. 1/2025 for gaseous fuel storage services for the period until 31 March 2026, which – in connection with legal regulations regarding the rules for maintaining mandatory natural gas stocks – provided for different parameters of storage services until 30 September 2025 (Part A of the tariff) and from 1 October 2025 (Part B of the tariff), which corresponded to diversified fee rates for storage services – Part A and Part B, respectively.

As at the date of approval of the tariff, there was a temporary extension of the permissible time for withdrawal of mandatory gas stocks from storage facilities. Until 30 September 2025, the mandatory natural gas stocks could be maintained in storage facilities whose technical parameters allowed to deliver their total volume to the gas system in a period of no more than 50 days¹¹³. From 1 October 2025, there was a return to the regulations determining the possibility of delivering the total amount of mandatory stocks of natural gas accumulated in storage facilities to the gas system in the period not longer than 40 days¹¹⁴.

In the tariff, the volume of working capacity in the bundle remained unchanged, namely 200 MWh. The structure of the services offered has not changed, either – the gas SSO offers firm and interruptible, long-term and short-term services, in the form of a bundled unit, a flexible bundled unit, as well as Unbundled and Reverse Storage Services.

For the period in which Part A of the tariff applied, that is until 30 September 2025, the average rate for the storage service increased by nearly 1.28% compared to the previously applied tariff. In turn, the introduction of Part B of the tariff for application on 1 October 2025, was associated with a decrease in the average storage service rate by approximately 0.02%.

At the same time, by the aforementioned decision the regulatory account balance was reconciled as at 31 December 2023, in the amount of (-) PLN 13,139.20 thousand (over-recovered revenue). The calculation of Tariff No. 1/2025 for gaseous fuel storage services took into account the entire regulatory account balance, which results in a reduction of the revenue for the calculation of storage fee rates.

On 15 December 2025 the President of URE approved the amendment to the tariff, which was due to an increase – as of 1 January 2026 – in the cost of purchasing gaseous fuel transmission services due to the introduction of a new tariff of the gas transmission pipeline operator OGP GAZ-SYSTEM S.A. for

¹¹² Article 98 § 2 of the Code of Administrative Procedure.

¹¹³ Article 70d of the Act on Stocks (in the wording of the Act of 5 August 2022).

¹¹⁴ Article 24 para. 2 item 2 of the Act on Stocks.

application from that date. The increase in average fees for storage services resulting from this amendment to the tariff amounted to 0.44%.

OGP GAZ-SYSTEM S.A. – tariff for liquefied natural gas regasification services

As of 1 January 2025, in settlements for LNG regasification services and additional services provided by the operator¹¹⁵ of the Lech Kaczyński LNG Terminal in Świnoujście, Tariff No. 10, approved by the President of URE by decision of 16 December 2024 for the period from 1 January 2025 to 1 January 2026 was applied.

By decision of 17 December 2025, the President of URE approved Tariff No. 11 for LNG regasification services for the period from 1 January 2026 to 1 January 2027.

At the same time, the aforementioned decision of 17 December 2025 settled the regulatory account balance as at 31 December 2024, in the amount of PLN 2,069 thousand.

The approval of Tariff No. 11 resulted in an increase in the average rate for regasification services by 3.5% compared to the average rate calculated under the applicable tariff (for the value of the contracted capacity and the volume of gas after regasification used in the calculation of the approved tariff), while the rate for LNG transshipment onto tanker trucks decreased by 6.4%. The above change in rates for regasification services was mainly due to an increase in costs related to the commissioning of new infrastructure (the third storage tank and the new jetty).

In Tariff No. 11, similarly to the previous tariff, the rates of fees (fixed and variable) were determined for bundled regasification services of liquefied natural gas, including: unloading of LNG from a tanker, in-process storage in tanks, regasification and return of gaseous fuel to the transmission system, as well as rates of fees for LNG transshipment on tanker trucks. LNG regasification services may be provided as long-term services – for a period longer than one year, and short-term services – for at least one gas day. In addition, the tariff includes the rates of fees for unbundled services, that is unbundled in-process storage of LNG and unbundled contracted regasification capacity, which will be provided in addition to bundled services. In the tariff for 2026, the fee rates for additional services have also been calculated: small-scale loading, large-scale loading, transshipment from the carrier to other gas carriers and refuelling of ships using LNG for propulsion (so-called bunkering). The new additional services have been offered since 1 January 2025 in connection with the completion of the LNG terminal expansion programme, that is the commissioning of the third LNG tank and the infrastructure on the new jetty.

The calculation of the enterprise's tariff was performed on the basis of the planned annual operating costs along with a justified return on capital, based on the so-called "gas-in-kind" principle, according to which OGP GAZ-SYSTEM S.A. does not include in the tariff the costs of purchasing gas used in the regasification process. This cost is borne directly by the regasification service ordering party, accepting the fact that it receives less gas from the terminal (in MWh) than it feeds into it (in MWh).

It should be added that in 2025 and in previous years, users of the LNG terminal feeding regasified natural gas into the transmission system did not incur a fixed entry fee into this system due to a 100% discount¹¹⁶.

¹¹⁵ On 31 March 2021, the merger of OGP GAZ-SYSTEM S.A. and Polskie LNG S.A. took place – with OGP GAZ-SYSTEM S.A. being the acquiring company and Polskie LNG S.A. being the acquired company. Until then, the tariff had been calculated by Polskie LNG S.A.

¹¹⁶ As of 1 January 2026, it was reduced to 70%, pursuant to the Information of the President of URE No. 9/2025, <https://www.ure.gov.pl/pl/biznes/taryfy-zalozenia/mnozники-wspolczynniki-sezonow-1/12236,Mnozники-wspolczynniki-sezonowe-i-rabaty-na-2026-r-art-28-NC-TAR.html>

Monitoring access to storage, storage capacity of gas pipelines and other ancillary services

The President of URE monitors the performance of tasks by the gas SSO, primarily as part of the proceedings for the approval of the gas Storage Facility Code (SFC) and the annual survey of the operator's functioning.

Storage Facilities Code

The gas SSO manages natural gas installations on the basis of the gas SFC, approved by the President of URE. In accordance with the provisions of the Energy Law Act, the SFC specifies in particular:

- 1) procedures for the conclusion of storage services contracts,
- 2) procedures for access to and allocation of storage capacity,
- 3) congestion management of the gas system,
- 4) criteria for security of operation of facilities,
- 5) procedures to be followed in the event of a threat to security of gas supply,
- 6) emergency procedures,
- 7) conditions for cooperation between the storage system operator and other gas system operators,
- 8) procedures for the communication of information between system operators and between the storage system operator and customers,
- 9) quality parameters for gaseous fuels and service quality standards for gas system users,
- 10) characteristics of the services for the injection of gaseous fuels into storage facilities or groups of storage facilities,
- 11) characteristics of services for the offtake of gaseous fuels from storage facilities or groups of such facilities.

In 2025 the President of URE approved Amendment No. 2 to the SFC¹¹⁷, which entered into force on 29 January 2025. The amendment concerned two areas:

- 1) harmonisation of the SFC provisions with the legal regulations resulting from Article 4c para. 2 of the Energy Law Act and § 37a of the Gas System Regulation, regarding the gas SSO's activities when making storage capacity available to the gas TSO for the performance of its tasks. Rules for the reduction of storage capacity covered by contracts for the provision of long-term storage services in favour of the gas TSO were introduced in the SFC, in the event that the TSO reports a demand for storage capacity for the following year at a level exceeding the available storage capacity. In such a case, the SSO applies a two-stage reduction mechanism for contracted storage services, that is as part of so-called voluntary and mandatory reductions. In a situation where the reported quantities of voluntarily reduced storage services do not meet the gas TSO's demand, a mandatory reduction of storage capacities takes place on a proportional reduction basis, to be applied from the following storage year. Storage capacities allocated or used for the purpose of maintaining mandatory natural gas stocks, which remain at the disposal of the minister responsible for energy commodity management, are not subject to mandatory reduction¹¹⁸,
- 2) the need to provide storage services with parameters that meet the requirements of the Act on Stocks, concerning the maximum period of delivery of natural gas from storage facilities to the gas transmission system.

On 31 October 2025, Gas Storage Poland sp. z o.o. submitted an application to the President of URE for the approval of Amendment No. 3 to the gas SFC, on the basis of which the President of URE

¹¹⁷ <https://bip.ure.gov.pl/bip/taryfy-i-inne-decyzje-b/inne-decyzje-informacj/4771,Inne-decyzje-informacje-sprawozdania-opublikowane-w-2025-r.html>

¹¹⁸ Pursuant to Article 26 para. 1 of the Act on Stocks.

initiated administrative proceedings. The proceedings were concluded by a decision of the President of URE of 4 March 2026¹¹⁹ approving the amendment to the SFC.

Parameters of storage facilities in 2025

Gas Storage Poland sp. z o.o., acting as the gas SSO, conducts natural gas storage activities nationwide. The company provides natural gas storage services within two storage facility groups and one storage facility.

The performance of the operator's duties by Gas Storage Poland sp. z o.o. takes place on the basis of an entrustment agreement concluded between the operator and the owner of the UGS facilities, which is ORLEN S.A.

The technical capacities of the storage facilities in 2025 are presented in the table below.

Table 25. Operation of storage facilities in 2025 (as at 1 January 2026 at 6:00 am)

Name and type of storage facility			Type of stored gas	Working volume				Volume of gas withdrawn from the storage facility	Volume of gas injected into the storage facility	Minimum stock level in 2025	Maximum stock level in 2025	Status as at 6:00 am on 1 January 2026	
				[mln m³]	[GWh] ²⁾		[GWh]	[GWh]	[GWh]	[GWh] ³⁾	[GWh]		
GIM Kawerna ¹⁾	cUGS Mogilno	in salt caverns	E gas	874.32	580.92	9 742.80	6 471.40	6 600.5	6 913.0	5 345.4	9 255.4	9 092.1	
	cUGS Kosakowo				293.40		3 271.40						
GIM Sanok ¹⁾	UGS Brzeźnica	in a depleted high-methane gas reservoir		1 135.00	100.00	12 832.30	1 126.0	11 830.7	9 793.9	3 245.8	13 014.9	9 383.8	
	UGS Husów						500.00						5 650.0
	UGS Strachocina						460.00						5 211.8
	UGS Swarzędów						75.00						844.5
Storage facility PMG Wierzchowice ¹⁾		in a depleted nitrogenous gas reservoir		1 300.00	14 729.0		9 835.6	9 591.6	5 104.9	14 696.5	11 935.5		
Total				3 309.32	37 304.10		28 266.8	26 298.5	-	-	30 411.4		

¹¹⁹ <https://bip.ure.gov.pl/bip/taryfy-i-inne-decyzje-b/inne-decyzje-informacyj/4915,Inne-decyzje-informacje-sprawozdania-opublikowane-w-2026-r.html>

- 1) Settlements of gaseous fuel storage services are carried out only for GIM Kawerna, GIM Sanok and Instalacja Magazynowa (Storage Facility) PMG Wierchowice.
- 2) Working capacity of the storage facility [in GWh] determined after the projected heat of combustion.
- 3) Maximum storage status taking into account the filling level of the facility determined by the actual heat of combustion.

Source: URE's own analysis on the basis of data of Gas Storage Poland sp. z o.o.

Provision of services

The provision of storage services is carried out on the terms and conditions specified in the gas SFC, which is approved by the President of URE.

Gas Storage Poland sp. z o.o. offers long- and short-term storage capacities through applications submitted by storage service users under application procedures. Gas Storage Poland sp. z o.o. may also offer short-term storage capacities through auctions.

The table below presents the storage services offer of Gas Storage Poland sp. z o.o. announced in the application procedures conducted in 2025. During this period, the company did not offer storage capacities through auctions.

Table 26. Storage capacities offered by Gas Storage Poland sp. z o.o. in 2025 through applications

Storage facility	Type of storage service (SS)	Number of bundles	Working volume	Injection capacity	Withdrawal capacity	Start of the offer period	End of the offer period
		[items]	[MWh]	[MWh/h]	[MWh/h]		
Storage capacity on a firm basis							
Storage facility PMG Wierchowice	Long-term in the form of Bundles, Flexible Bundles or Unbundled SS	19 808	3 961 600	1 644.064	4 278.528	15.04.2025 6:00 am	15.04.2026 6:00 am
GIM Sanok		11 958	2 391 600	1 040.346	2 475.306	15.04.2025 6:00 am	15.04.2026 6:00 am
GIM Kawerna		34 956	6 991 200	4 579.236	9 158.472	15.04.2025 6:00 am	15.04.2026 6:00 am
		275	55 000	36.025	72.050	1.08.2025 6:00 am	1.08.2026 6:00 am
Storage Facility PMG Wierchowice	Long-term in the form of Bundles*	7 130	1 434 000	595.110	1 548.720	15.04.2025 6:00 am	15.04.2026 6:00 am
GIM Sanok		3 697	739 400	321.639	765.279	15.04.2025 6:00 am	15.04.2026 6:00 am
GIM Kawerna		4 921	984 200	644.651	1 289.302	15.04.2025 6:00 am	15.04.2026 6:00 am
Storage capacity on an interruptible basis							
Storage Facility PMG Wierchowice	Long-term in the form of Bundles, Flexible Bundles or Unbundled SS	36 632	7 326 400	3 223.616	4 835.424	15.04.2025 6:00 am	15.04.2026 6:00 am
		22 000	4 400 000	1 936.000	2 904.000	15.04.2026 6:00 am	15.04.2027 6:00 am
GIM Sanok		46 061	9 212 200	3 869.124	4 882.466	15.04.2025 6:00 am	15.04.2026 6:00 am
		23 000	4 600 000	1 932.000	2 438.000	15.04.2026 6:00 am	15.04.2027 6:00 am
GIM Kawerna		2 050	410 000	305.450	703.150	15.04.2025 6:00 am	15.04.2026 6:00 am
		2 000	400 000	298.000	686.000	15.04.2026 6:00 am	15.04.2027 6:00 am
	Short-term in the form of Bundles, Flexible Bundles or Unbundled SS	1 152	230 400	171.648	395.136	01.07.2025 6:00 am	01.04.2026 6:00 am
		324	64 800	48.276	111.132	01.11.2025 6:00 am	01.04.2026 6:00 am

- * As of 1 October 2025, long-term storage capacities in the form of bundled unit were provided as Long-Term Storage Services on interruptible terms in accordance with item 9.5.2 of the SFC version 001 with Amendment No. 2.

Source: URE specification based on data from Gas Storage Poland sp. z o.o.

Information on the services offered, including standard contract templates, the current tariff and the SFC, is published on the gas SSO website.

Monitoring of the fulfilment of the tasks of the natural gas liquefaction system operator

The President of URE monitors the fulfilment of tasks by the Liquefied Natural Gas System Operator (LNG System Operator), primarily as part of the procedure for approving the LNG Facility Code and the annual examination of the operator's performance.

Liquefied Natural Gas Facility Code

Pursuant to Article 9g para. 1 of the Energy Law Act, the liquefied natural gas system operator is obliged to develop the Liquefied Natural Gas Facility Code, which, pursuant to Article 9g para. 3b of the Energy Law Act, specify the detailed terms and conditions for the use of the liquefied natural gas facility by users, as well as the terms and conditions for the operation, maintenance, and development planning of these facilities.

In 2025, the Liquefied Natural Gas Facility Code, approved by the decision of the President of URE of 19 December 2024, was in force (the effective date of the Code was 1 January 2025). The decision is available in the Public Information Bulletin of URE¹²⁰.

Description of gas liquefaction and regasification systems

Conducting business activity in the field of liquefied natural gas liquefaction and regasification of liquefied natural gas in liquefied natural gas facilities with a capacity of at least 200 m³/h requires a license.

In 2025, six entities held licences to conduct business activity in the field of liquefied natural gas liquefaction and regasification of liquefied natural gas in liquefied natural gas facilities, including five entities that held the status of a liquefied natural gas system operator. The largest of these facilities is the LNG Terminal in Świnoujście. The remaining facilities are local terminals that primarily feed island distribution networks and individual customers.

LNG Terminal in Świnoujście

The owner and operator of the LNG Terminal in Świnoujście is OGP GAZ-SYSTEM S.A. This terminal is an installation designed for:

- LNG unloading from carriers with a capacity of up to 217,000 m³ of LNG,
- process storage in tanks with a total capacity of 500,000 m³ of LNG,
- LNG regasification – which allows for a maximum yield of 8.3 bcm of natural gas per year,
- LNG reloading onto tank trucks and ISO containers,
- LNG reloading onto small- and large-scale carriers,
- LNG bunkering.

¹²⁰ <https://bip.ure.gov.pl/bip/taryfy-i-inne-decyzje-b/inne-decyzje-informacj/4574,Inne-decyzje-informacje-sprawozdania-opublikowane-w-2024-r.html>

Table 27. LNG Terminal in Świnoujście in numbers – 2025

LNG facility type	Maximum volume of LNG unloading	Maximum daily volume of gas fed into the national network	Capacity for commercial purposes		LNG tank capacity	Volume of LNG brought	Maximum technical capacity
			total offered	reserved			
LNG unloading, process storage and regasification facility	212 473 m ³ LNG 127,107 M Nm ³ 1 420 678 MWh	40 369 m ³ LNG/d 23 616 thous. m ³ /d 263 956 MWh/d	946 000 Nm ³ /h 10 579,502 MWh/h	946 000 Nm ³ /h 10 579,502 MWh/h	500 000 m ³ LNG 288,31 M Nm ³ 3 430 000 MWh	14 484 664 m ³ LNG/y 91,59 TWh/y	984 000 Nm ³ /h 10 998,17 MWh/h
LNG truck loading facility			3 660 000 MWh/year	3 660 000 MWh/year			180 m ³ LNG/h 1 234,8 MWh/h

Source: URE on the basis of data from OGP GAZ-SYSTEM S.A.

The LNG Terminal in Świnoujście is connected to the gas transmission system with an entry capacity into this transmission system of 10.58 GWh/h. In 2025, the following services were performed¹²¹:

- volume of LNG unloaded from carriers – 91.60 TWh
 - of which 87.49 TWh was injected into the NTS (National Transmission System),
- 2.95 TWh of LNG was reloaded onto tank trucks,
- 2.96 GWh of LNG was reloaded onto vessels.

In 2025, OGP GAZ-SYSTEM S.A. continued the project to construct a fourth LNG tank truck loading bay at the LNG Terminal in Świnoujście, driven by the steadily growing demand for LNG reloading onto tank trucks. The new bay will significantly increase the Terminal's loading capacity. Upon project completion, the LNG Terminal operator will be able to handle up to 60 tank trucks per day, representing a 50% increase in loading capacity compared to the current level of 40 tank trucks per day.

Local liquefied natural gas facilities

It is estimated that in 2025, in about 169¹²² local LNG facilities connected to distribution systems approximately 0.96 TWh¹²³ of natural gas was regasified. It should be noted that some of these facilities are exempt from the licensing obligation. Most LNG stations feed island distribution networks (with no connection to the national gas grid). There are also cases where LNG stations support the operation of the national gas grid in areas with limited capacity, e.g. in the Białystok region.

Provision of services

In 2025, OGP GAZ-SYSTEM S.A. provided gaseous fuel regasification services (long-term as well as short-term, so-called spot services) and ancillary services. The regasification service is bundled, and as part of it, the operator provides the user with LNG unloading from the carrier, process storage, LNG regasification, and delivery of gaseous fuel to the exit point from the LNG Terminal in Świnoujście. On the other hand, as an ancillary service, OGP GAZ-SYSTEM S.A. provides LNG reloading onto tank trucks, unbundled process storage, unbundled contractual capacity, LNG loading, transshipment, and LNG ship bunkering.

LNG ship bunkering, LNG loading, and transshipment services were available as of 1 January 2025, that is from the effective date of the amendments to the Code approved by the decision of the

¹²¹ <https://www.gaz-system.pl/pl/terminal-lng/terminal-lng-dane-techniczne/dane-operacyjne.html#>

¹²² Data as at the end of 2025 on the basis of gas DSOs reports on development plans implementation for 2025.

¹²³ Information from GAZ-3.

President of URE of 19 December 2024¹²⁴. In 2025, the operator additionally implemented a new service for issuing sustainability certificates, which is described in more detail in Chapter 2 of the Report.

Information on the services offered, including standard contract templates, the current tariff, and the LNG Facility Code, is published on the Operator's website.

4.1.2. System balancing

The balancing of the gas system is performed by the gas TSO as part of the gaseous fuels transmission services provided in three balancing zones. The National Transmission System comprises two balancing zones: E gas zone and Lw gas zone. The third separate balancing zone is the Transit Gas Pipeline System (TGPS). The high-methane gas balancing zone in the National Transmission System and the TGPS balancing zone are connected by the Connection Point, through which natural gas can be transmitted. Physical (operational) balancing is carried out by the gas TSO in order to ensure operational security and integrity of the transmission system. On the other hand, commercial balancing is the gas TSO's activity consisting in determining and settling the imbalance resulting from the difference between the quantities of gaseous fuel delivered and received in a given balancing zone by system users.

The balancing rules of the TSO have been regulated in the gas TNC, which is subject to approval by the President of URE. The Code contains a separate part concerning system balancing and congestion management. The gas TNC specifies the platform on which the TSO is authorised to buy and sell gas. It is a market operated by TGE S.A. The TNC also regulates the method of determining the price for daily imbalance. The system users, including customers whose facilities, installations or networks are connected to the network of the gas TSO or using the services provided by it, are obliged to comply with the terms and requirements and procedures of conduct and exchange of information specified in the TNC. The Code constitutes a part of a contract for the provision of gaseous fuels transmission services or a comprehensive contract.

4.1.3. Cross-border issues

Rules of access to cross-border infrastructure

The rules of access to the natural gas system, including the rules for transmission capacity allocation and congestion management, are regulated in Regulation 2024/1789 and in Annex I to this act, as well as in the CAM NC. Detailed provisions governing the rules for capacity management and allocation on the gas market in Poland, including congestion management rules, were approved by the President of URE in the NTS TNC and TGPS TNC.

The CAM NC was adopted on the basis of Regulation 2024/1789 and is directly applicable in all EU Member States. This Regulation governs capacity allocation mechanisms in gas transmission systems with respect to existing and incremental capacity, and establishes rules for cooperation between adjacent transmission system operators to facilitate capacity sales, taking into account general commercial and technical principles related to capacity allocation mechanisms.

In accordance with the CAM NC, capacity allocation mechanisms include an auction procedure applied at interconnection points within the EU with respect to standard capacity products that are offered and allocated. This Regulation assumes that the same auction model is applied at all interconnection points. The relevant auction processes start simultaneously at all interconnection points. Standard capacity products shall be offered in the following order: first, products for annual

¹²⁴ <https://bip.ure.gov.pl/bip/taryfy-i-inne-decyzje-b/inne-decyzje-informacj/4574,Inne-decyzje-informacje-sprawozdania-opublikowane-w-2024-r.html>

capacity shall be offered, followed by products for capacity with the next shortest duration within the same timeframe. Transmission system operators shall offer yearly, quarterly, monthly, daily, and intraday standard capacity products for firm capacity. Interruptible capacity shall be offered where the respective firm capacity product has been sold with an auction premium¹²⁵, has been sold out, or was not offered. Network users shall be provided with the maximum technical capacity, taking into account system integrity, safety, and efficient network operation. Adjacent transmission system operators shall jointly offer bundled capacity products.

In the Polish natural gas transmission system, in accordance with the rules specified in the TNC, at a given physical entry point or physical exit point, the allocation of capacity (contractual capacity) takes place on a firm basis and on an interruptible basis. Available capacity on a firm basis at an existing physical entry or exit point, at the interconnection with the transmission system of an EU Member State, as well as at a physical interconnection point connecting transmission systems for the purpose of providing integrated capacity services, to the extent agreed with the interconnected system operator, is made available by the gas TSO as bundled capacity.

To the extent that the available capacity of these points is not made available as bundled capacity, its allocation takes place within an auction procedure on the Auction Platform as unbundled capacity. The gas TSO allocates the available capacity of the transmission system for yearly, quarterly, monthly, single gas day, and intraday periods via the GSA and RBP booking platforms¹²⁶.

Congestion management principles

In accordance with the provisions of the TNC, the TSO operates the transmission system and controls its traffic in a manner that reduces the probability of system congestion, as well as plans and implements works within the system (including system expansion) so as not to cause congestion.

The transmission system operator undertakes actions to eliminate the possibility of system congestion, including among others:

- at the stage of consideration of capacity allocation requests or approval of capacity allocation forecasts, the TSO shall analyse the possibility of performance of new contracts so that they do not result in a decrease of the security of supply and the quality of gaseous fuel supplied to the existing system users,
- where it is possible to provide transmission services, the TSO offers the available capacity in accordance with the provisions of the gas TNC,
- if firm transmission services cannot be provided, the TSO shall make interruptible transmission services available, if possible,
- it plans the work in the system so as not to cause congestion, and if congestion is necessary in connection with the work carried out, it endeavours to minimise their effects.

In accordance with Article 10(3) of Regulation 2024/1789, the TSO shall offer unused firm capacity on the primary market on an interruptible basis (in case of contractual congestion) and shall allow network users to resell or otherwise make available on the basis of another legal title the unused contracted capacity on the secondary market. In 2025, 30 offerings ended with resale transactions on a secondary market, with a total volume of 26,236,886 MWh.

In accordance with the provisions of point 2 of Annex I to Regulation 2024/1789, containing guidelines governing the principles of capacity allocation mechanisms and congestion management procedures, in the event of contractual congestion, the gas TSO is obliged to implement measures aimed at increasing capacity at points where all capacity has previously been booked, although not always fully utilised.

¹²⁵ Auction premium – the difference between the clearing price and the reserve price in an auction.

¹²⁶ <https://ipnew.rbp.eu/Rbp.eu/#/>

Contractual congestion management procedures have been approved by the President of URE in both the NTS TNC and the TGPS TNC. The main purpose of their application is to prevent the occurrence of and eliminate existing contractual congestion at interconnection points with neighbouring EU Member States. Contractual congestion management procedures include the following mechanisms:

1) Oversubscription and buy-back scheme (implemented in Poland on 1 October 2013)

The oversubscription and buy-back scheme assumes that if the TSO determines, based on analyses, including statistical ones, that at a given interconnection point there is booked firm capacity that is regularly underutilised during a given period, thereby restricting access to the transmission system for other entities, the TSO has the right to make this capacity available to other market participants as a Day-Ahead product on a firm basis. However, in the event that the originally entitled entity wishes to utilise this capacity on a day for which the TSO has sold capacity under oversubscription, the TSO will conduct a buy-back auction, during which it will offer users the opportunity to resell to the TSO the capacity they purchased under the oversubscription scheme. The price cap for such an auction is 10 times the daily transmission capacity rate. If the TSO is unable to buy back the capacity to enable the execution of all nominations, the TSO will reduce the capacity allocation against a corresponding discount specified in the TSO tariff.

In 2025, no circumstances arose that would result in the application of the oversubscription and buy-back scheme.

2) Long-term use-it-or-lose-it mechanism (implemented in Poland on 1 October 2013)

In accordance with the assumption of the guidelines on congestion management procedures, the mechanism based on the long-term "use-it-or-lose-it" principle (long-term UIOLI mechanism) is applied by the TSO and the President of URE as a measure to counteract long-term capacity hoarding. It assumes that if, at interconnection points, a network user utilises on average less than 80% of its booked capacity annually, both from 1 April to 30 September and from 1 October to 31 March, with an effective contract duration of more than one year, which the user cannot properly justify, and has neither sold nor offered its underutilised capacity on reasonable terms, and other network users are requesting firm capacity, the TSO shall report this to the President of URE. In this situation, the regulator, after analysing the data provided by the TSO, issues a decision in which it obliges the TSO to withdraw the underutilised part of the booked capacity from the user.

In 2025, the gas TSO did not report to the President of URE any need to apply the procedure based on the long-term "use-it-or-lose-it" principle to long-term allocations of booked capacity.

3) Surrender of contracted capacity

Every user has the right to surrender its contracted capacity and transfer it to the TSO. The surrender of allocated capacity on a firm basis is possible at physical entry or exit points at interconnections with the transmission systems of neighbouring countries and at the IP. The user retains all rights and obligations related to the contracted capacity until it is reallocated by the TSO to another user.

In 2025, there were no recorded cases of a user surrendering its contracted capacity.

4) Firm day-ahead use-it-or-lose-it mechanism (implemented in Poland on 1 July 2016)

The firm day-ahead "use-it-or-lose-it" mechanism (FDA UIOLI) is applied by the TSO as a result of being obliged to do so by the President of URE, if the annual ACER IP congestion monitoring report regarding firm capacity products¹²⁷ shows that during capacity allocation procedures demand exceeded offer at the reserve price, when auctions are used in a given year or in the subsequent two

¹²⁷ ACER Report referred to in point 2.2.1 subpoint 2 of guidelines to Regulation 2024/1789.

years – in respect of specific conditions concerning the quantity of firm capacity products of a specific duration¹²⁸.

Under this mechanism, for each network user at interconnection points, the TSO introduces rules regarding revisions to the initial nomination. Renomination is permitted only within the range of 10% to 90% of the allocated capacity on a firm basis. However, if the nomination exceeds 80% of the allocated capacity, only half of the unnominated quantity may be renominated upwards. Within the remaining capacity allocated to the user, the renomination is treated as a renomination submitted for interruptible capacity. If the nomination does not exceed 20% of the allocated capacity, then half of the nominated quantity may be renominated downwards.

In 2025, the firm day-ahead "use-it-or-lose-it" mechanism was not applied.

Monitoring of investment plans and assessment of their consistency with the EU-wide development plan

Energy undertakings involved in the transmission or distribution of gaseous fuels are obliged to prepare, for the area of their activity, development plans for satisfying current and future demand for those fuels¹²⁹.

Agreeing on the draft development plans is aimed at ensuring compliance of these draft plans with the legal regulations and compliance with the state's energy policy. Development plans – due to a multiannual investment cycle and involvement of significant financial resources (high capital-intensity), which cause long-term financial consequences for the company and its customers – have a direct impact on the level of the future tariffs of the company. Therefore, agreeing on the draft development plans is directly connected with issuing decisions on tariff approval.

In the process of agreeing on the development plans, the consistency of the envisaged measures with the Ten-Year Network Development Plan (TYNDP) is also verified. This document is intended to guide and ensure consistency in the pursuit of energy objectives at the European Union level in terms of security of supply, energy prices as well as sustainability.

Development plans are also a source of information on the investment plans of the company in terms of planned investments aimed to connect new customers and projects necessary to maintain an appropriate level of reliability and quality of provided network services.

In 2025, regulations were in force providing for the agreement of development plans by DSOs and TSO engaged in hydrogen transmission and distribution via hydrogen networks, adopted at the end of 2024 in the act aimed at eliminating development barriers in the hydrogen market¹³⁰, as presented in the previous National Report. Despite the introduction of such an obligation, it did not, however, find practical application in 2025. This is due to the fact that by the deadline for submitting draft development plans for agreement, falling on 30 April 2025, no entity had yet obtained the status of a hydrogen transmission or distribution system operator, meaning that during this period there were no entities obliged to prepare a development plan for meeting current and future hydrogen demand.

In 2025, the obligation to submit draft development plans for agreement with the President of URE¹³¹ in the field of gaseous fuels applied to:

- 1) Gas TSO – OGP GAZ-SYSTEM S.A.,
- 2) 11 gas DSO, of which:

¹²⁸ In accordance with point 2.2.3 subpoint 1 sections a-d of guidelines to Regulation 2024/1789.

¹²⁹ Pursuant to Article 16 para. 1 of the Energy Law Act.

¹³⁰ Act of 21 November 2024 amending the Energy Law Act (Journal of Laws of 2024 item 1881)

¹³¹ Pursuant to Article 16 para. 2, 4 and 14a and Article 16¹ para. 1 and 7 of the Energy Law Act, development plans are submitted to the President of URE for reconciliation on a biannual basis.

- Polska Spółka Gazownictwa sp. z o.o. – the largest gas DSO in the country, with 7.6 million customers connected to the gas distribution system of this enterprise;
- 10 the so-called small gas DSO, with up to 100,000 customers connected to the gas distribution system of this enterprise,

3) Gas SSO – Gas Storage Poland sp. z o.o.

Transmission system operator (OGP GAZ-SYSTEM S.A.)

The Development Plan of OGP GAZ-SYSTEM S.A. consists of two parts:

- Part A, which concerns the development of the transmission infrastructure owned by it, and
- Part B, which concerns the development of the transmission infrastructure owned by SGT EuRoPol GAZ S.A., on which OGP GAZ-SYSTEM S.A. performs the function of operator in the Independent System Operator (ISO) formula¹³².

Pursuant to Article 16, para. 2 of the Energy Law Act, Part A of this Development Plan is subject to an update every two years, whereas Part B of this Plan, pursuant to Article 16, para. 3 of the Energy Law Act, is subject to an annual update.

In 2025, the TSO's (OGP GAZ-SYSTEM S.A.) development plan entitled the *National Ten-Year Transmission System Development Plan. Development Plan for Meeting Current and Future Demand for Gaseous Fuels for 2024–2033*", whose draft was agreed on 8 February 2024, was in force. An extract from the agreed NTSDP is available on the gas TSO website¹³³.

Pursuant to Article 16 paras 2, 13 and 14a of the Energy Law Act, on 28 April 2025, OGP GAZ-SYSTEM S.A. submitted for agreement with the President of URE another development plan entitled the *National Ten-Year Transmission System Development Plan (NTSDP) for the years 2026–2035*. This plan was agreed (both with respect to OGP GAZ-SYSTEM S.A.'s own network – Part A, and the network belonging to SGT EuRoPol GAZ S.A. – Part B) for the period covering the years 2026–2027. Due to OGP GAZ-SYSTEM S.A.'s failure to demonstrate the feasibility of implementing certain investments in the years 2026–2027, the amount of agreed capital expenditures for these years was reduced by 9.1% compared to the company's application.

The forecast presented in the draft development plan indicates that by 2031, due to the replacement of high-emission solid fuels with natural gas, a significant increase in transmitted natural gas will occur across all analysed scenarios. Concurrently, for the purposes of the forecast, it was assumed that the capacity installed in newly connected gas-fired units will replace the installed capacity in coal-fired units as follows:

- 1) in the baseline scenario: by approximately 25%,
- 2) in the Power Sector+ scenario: by approximately 36%,
- 3) in the Power Sector 20 GWe scenario: by approximately 57%.

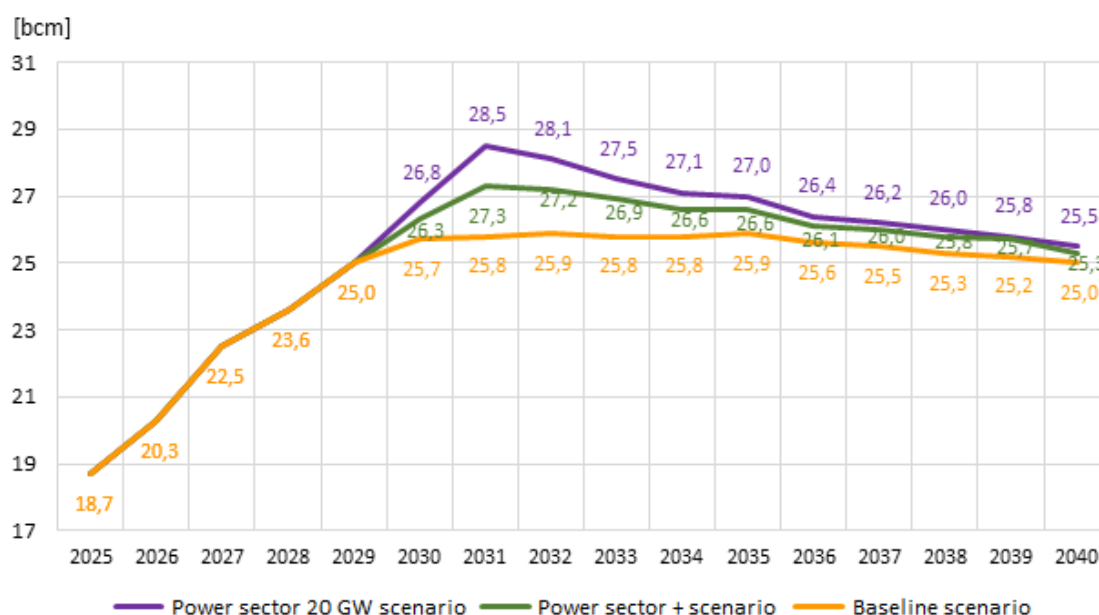
It is estimated that the volume of gaseous fuels transmitted through the transmission network in 2031, depending on the analysed scenario, will range from 25.8 bcm to 28.5 bcm, being approximately 44-55% higher than the volume transmitted in 2024. In turn, in 2035, that is the final year of the draft NTSDP in question, the volume of transmitted gaseous fuels will slightly decrease compared to 2031 and will range from 25.9 bcm to 27.0 bcm, depending on the scenario. The gradual decline in natural gas utilisation after 2031 was justified by EU regulations, which, from 2030, introduce a ban on installing fossil fuel boilers as standalone heat sources in all new residential buildings across the EU. Their installation is to be permitted only as devices operating in combination with other sources, which in practice precludes heating based exclusively on natural gas.

¹³² In conjunction with Article 1 item 26 section a of the Act of 20 May 2021.

¹³³ <https://www.gaz-system.pl/pl/system-przesylowy/rozwoj-systemu-przesylowego/krajowe-plany-rozwoju.html>

In the draft NTSDP, OGP GAZ-SYSTEM S.A. plans to further expand the transmission network, which, in addition to ensuring a high degree of diversification of gas sources and transmission directions, will enable access to competitive markets. As a result of the expansion of the national transmission system to date and the completion of the construction of new cross-border interconnections, its transmission capacity has increased. As a result of the implementation of development activities, a complete replaceability of technical import capacities located on the eastern border has been achieved. Currently, in addition to ensuring the diversification of supply directions, it has become important to create technical opportunities to access new sources of supply. Therefore, OGP GAZ-SYSTEM S.A. plans to further improve the degree of diversification of supply directions and sources based on LNG technology, which implies the need for further expansion of the transmission system and its adaptation to the new flow pattern.

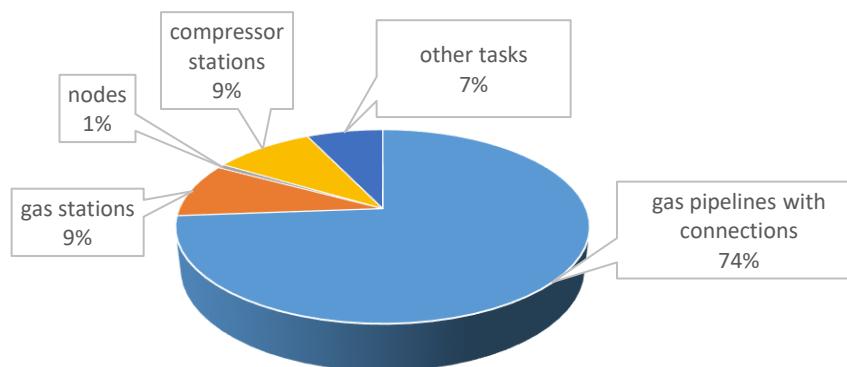
Figure 19. Results of forecasts for gaseous fuel transmission services demand – annual volumes in units of volume (total gases converted to high-methane natural gas – group E) [bcm]



Source: OGP GAZ-SYSTEM S.A.

Demand forecasts indicate a distinct change in the structure of gas consumers from the transmission network. An increased share of power plants and combined heat and power (CHP) plants is assumed, resulting from the energy transition. OGP GAZ-SYSTEM S.A. anticipates that approximately 38-40% of natural gas from the transmission network in 2035 will be transmitted to power plants and CHP plants, compared to 17% of gas sent out to these consumers in 2024.

Regarding biomethane, in the submitted draft development plan for the years 2026–2035, OGP GAZ-SYSTEM S.A. assumed, on the basis of available biomethane market analyses and issued grid connection conditions, among others, domestic biomethane production at a level of approximately 0.8–1.0 bcm in 2030 and up to 1.3 bcm in 2035, of which it was assumed that approximately 60% will be injected into the transmission system.

Figure 20. Structure of capital expenditures completed in 2025

Source: URE on the basis of a report of OGP GAZ-SYSTEM S.A.

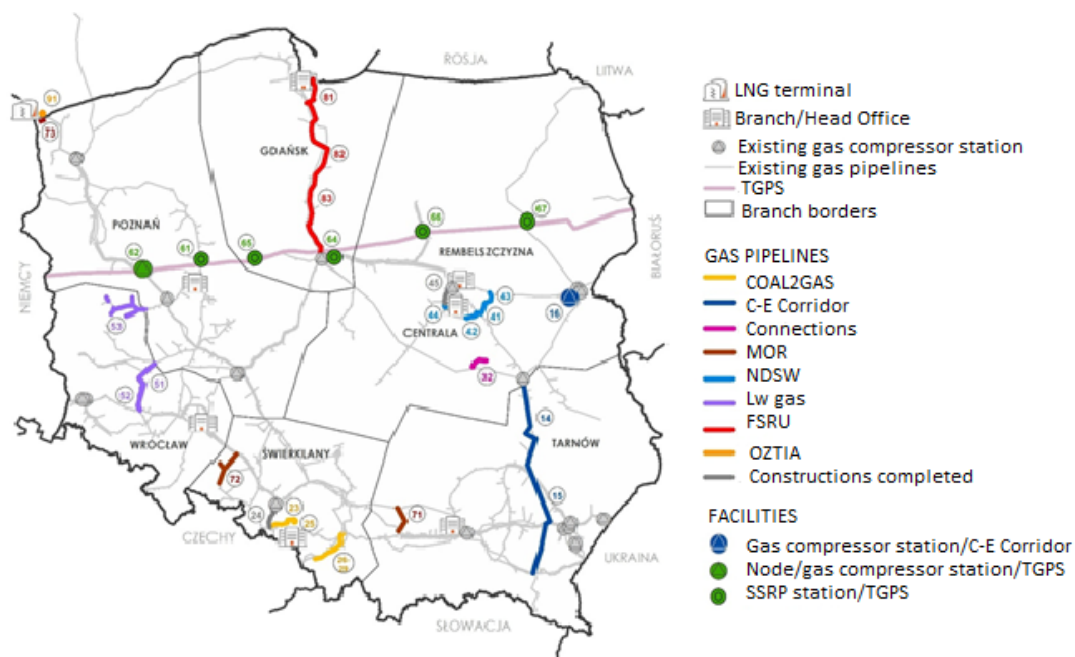
In 2025, OGP GAZ-SYSTEM S.A. carried out investment tasks in the transmission system in two basic areas:

- development area: construction of new system facilities and modernisation of the existing ones, aimed at increasing technical capabilities of the transmission system,
- safety area: modernisation and restoration tasks resulting from technical or operational needs.

The degree of financial implementation of the investment by OGP GAZ-SYSTEM S.A. for the national transmission system amounted to approximately 40% compared to the level of expenditures agreed for 2025.

In the year in question, OGP GAZ-SYSTEM S.A. completed the construction and commissioning of:

- Poland – Czech Republic gas pipeline stage I: Kędzierzyn – Racibórz with a length of 37 km and a diameter of DN 1000 mm,
- Rembelszczyzna – Mory gas pipeline with a length of 28.5 km and a diameter of DN 700 mm,
- System Reduction and Measurement Station (SRMS) in Długa Goślina with a capacity of 250 thous. m³/h,
- System Reduction and Measurement Station (SRMS) in Zambrów with a capacity of 1000 thous. m³/h.

Figure 21. Map of key investments, as at 31 December 2025

Source: OGP GAZ-SYSTEM S.A.

Table 28. Key investments – as at 31 December 2025

item	SWZI portfolio breakdown	Number on the map (Appendix 2)	Name of the project (investment/task)	Basic data	Branch	Project stage
1.	COAL2GAS PORTFOLIO	23	RACIBÓRZ – OŚWIĘCIM GAS PIPELINE Stage I: Racibórz-Rybnik	DN=700 L= 38.7 km MOP 8.4 MPa	Świerklany	CONSTRUCTION
2.		24	POLAND – CZECH REPUBLIC GAS PIPELINE Stage I: Kędzierzyn-Racibórz	DN=1000 L= 37 km MOP 8.4 MPa	Świerklany	COMPLETED
3.		25	PGE RYBNIK CONNECTION GAS PIPELINE	DN=500 L=4.5 km MOP 8.4 MPa	Świerklany	CONSTRUCTION
4.		26	SKOCZÓW – KOMOROWICE – OŚWIĘCIM GAS PIPELINE Stage II: Wilamowice – Oświęcim	DN=500 L=20.1km MOP 8.4 MPa	Świerklany	DESIGN
5.		27	SKOCZÓW – KOMOROWICE – OŚWIĘCIM GAS PIPELINE Stage III: Komorowice – Wilamowice	DN=500 L=11.4 km MOP 8.4 MPa	Świerklany	DESIGN
6.		28a	SKOCZÓW – KOMOROWICE – OŚWIĘCIM GAS PIPELINE Stage IV a: from ZZU Komorowice (without ZZU) to Stare Bielsko	DN=500 L=4.5 km MOP 8.4 MPa	Świerklany	DESIGN
7.		28b	SKOCZÓW – KOMOROWICE – OŚWIĘCIM GAS PIPELINE Stage IV b: from Stare Bielsko to ZZU Wapienica (without ZZU)	DN=500 MOP 8.4 MPa L=4.0 km	Świerklany	DESIGN
8.		29	SKOCZÓW – KOMOROWICE – OŚWIĘCIM GAS PIPELINE Stage V: Pogórze – Wapienica	DN=500 L= 17.3 km MOP 8.4 MPa	Świerklany	DESIGN

item	SWZI portfolio breakdown	Number on the map (Appendix 2)	Name of the project (investment/task)	Basic data	Branch	Project stage
9.	C-E CORRIDOR PORTFOLIO	14	WRONÓW – ROZWADÓW GAS PIPELINE	DN=1000 L=119.8 km MOP 8.4 MPa	Tarnów	DESIGN
10.		15	ROZWADÓW – STRACHOCINA GAS PIPELINE	DN=1000 L=161.6 km MOP 8.4 MPa	Tarnów	DESIGN
11.		16	TG HOŁOWCZYCE NEW COMPRESSOR UNIT (NASH)	Compression aggr. = 1 item Power= up to 13 MW	Rembelszczyna	DESIGN
12.	CONNECTION PORTFOLIO	32	CONNECTION OF EC KOZIENICE IN ŚWIERŻE GÓRNE	DN=700 L= 20 km MOP 8.4 MPa	Rembelszczyna	DESIGN
13.	MOR PORTFOLIO	71	WĘŻERÓW GAS PIPELINE – TRANSPORT WITH SSRP TRANSPORT	DN=700 L=45 km MOP 8.4 MPa	Tarnów	CONSTRUCTION
14.		72	LEWIN BRZESKI – NYSA GAS PIPELINE WITH BRANCHES	DN=500/150/100 L=41/10.1/1.6 km MOP 8.4 MPa	Świerklany	CONSTRUCTION
15.	NDSW PORTFOLIO	45	REMBELSZCZYZNA – MORY GAS PIPELINE	DN=700 L= 28.5km MOP 8.4 MPa	Rembelszczyna	COMPLETED
16.		41	WOLA KARCZEWSKA – KARCZEW GAS PIPELINE	DN=500 L=14.4 km MOP=8.4 MPa	Rembelszczyna	DESIGN
17.		42	KARCZEW – GASSY GAS PIPELINE	DN=400 L= 1.8km MOP=8.4 MPa	Rembelszczyna	DESIGN
18.		43	STANISŁAWÓW (MIŃSK MAZOWIECKI) – WOLA KARCZEWSKA GAS PIPELINE	DN=700 L=38 km MOP=8.4 MPa	Rembelszczyna	DESIGN
19.		44	MORY – REGUŁY GAS PIPELINE	DN=400 L= 5.2 km MOP=8.4 MPa	Rembelszczyna	DESIGN
20.	LW GAS PORTFOLIO	51	KOTOWICE – HM LEGNICA GAS PIPELINE Northern section (KOTOWICE – KRZECZYN)	DN=300 L= 37.9 km MOP=8.4 MPa	Wrocław	DESIGN
21.		52	KOTOWICE – HM LEGNICA GAS PIPELINE	DN=300 L= 25.8 km MOP=8.4 MPa	Wrocław	DESIGN

item	SWZI portfolio breakdown	Number on the map (Appendix 2)	Name of the project (investment/task)	Basic data	Branch	Project stage
	TSGP PORFOLIO		Southern section (KRZECZYN – HM LEGNICA)			
22.		53	NOWE TŁOKI – SULECHÓW GAS PIPELINE (RAKONIEWICE – ŚWIEBODZIN)	DN=300/150/100 L=42.9/23.6/ 10.6 km MOP=8.4 MPa	Wrocław	CONSTRUCTION
23.	TSGP PORFOLIO	61	SSRP DŁUGA GOŚLINA	DN=500 MOP=8.4 MPa Q=250 thous. m ³ /h	Poznań	COMPLETED
24.		62	TG LWÓWEK	DN=1000 MOP=8.4 MPa Q(two-direct.)=1600 thous. m ³ /h Compr. Aggr. = 3 items Power=24 MW	Poznań	CONSTRUCTION WORKS TENDER
25.		64	SSRP WŁOCŁAWEK	DN=1000 Q(two-direct.)=1000 thous. m ³ /h	Gdańsk	DESIGN
26.		65	SSRP WYDARTOWO	DN=700 MOP=8,4 MPa Q(two-direct.)=1200 thous. m ³ /h	Gdańsk	CONSTRUCTION
27.		66	SSRP CIECHANÓW-PAWŁOWO	DN=700 MOP 8,4 MPa Q=250 thous. m ³ /h	Rembelszczyzna	CONSTRUCTION
28.		67	SSRP ZAMBRÓW	DN=700 Q=1000 thous. m ³ /h	Rembelszczyzna	COMPLETED
29.	FSRU PORTFOLIO	81	KOLNIK – GDAŃSK GAS PIPELINE POM 1	DN1000 L= 34 km MOP 8.4 MPa	Gdańsk	CONSTRUCTION
30.		82	GARDEJA – KOLNIK GAS PIPELINE POM 2	DN1000 L= ca. 88 km MOP 8.4 MPa	Gdańsk	CONSTRUCTION
31.		83	GUSTORZYN – GARDEJA GAS PIPELINE POM 3	DN1000 L= ca. 128 km MOP 8.4 MPa	Tarnów	CONSTRUCTION

Source: OGP GAZ-SYSTEM S.A.

The Renovation Plan in 2025 comprised 229 tasks, including 146 planned for completion in 2025, of which 138 (94.5%) were completed. The material effect of the renovations carried out was:

- elimination of 43 gas pipeline shallows,
- replacement of 3,660 m of gas pipelines,
- replacement of 18 pieces of fittings,

- removal of 8 leaks on gas pipelines,
- repair of 5 corrosion protection stations, 9 gas facility devices,
- execution of 63 general construction works,
- decommissioning of 5 gas stations.

The financial implementation of the Renovation Plan in 2025 amounted to PLN 76.9 million, which is 88.4% of the plan. Renovation tasks not completed in 2025 (91) will be continued according to schedule in 2026.

Along with Part A of the TYNDP for the years 2026–2035, by a letter of 28 April 2025, OGP GAZ-SYSTEM S.A. submitted Part B, covering investment tasks on the transmission network owned by the energy enterprise – SGT EuRoPol GAZ S.A., where it acts as the operator under the ISO model (hereinafter: TGPS infrastructure).

Investment tasks in the TGPS infrastructure under the TYNDP Part B for the years 2026–2035 are of a modernisation and replacement nature and serve to ensure the safety, continuity, reliability, and optimisation of gas transmission in accordance with the transmission capacities made available. The plan assumes maintaining the existing transmission capacities of the TGPS infrastructure in the west-to-east direction, and its adaptation to operate in the new framework following the unbundling under the entrustment agreement.

Operators of gas distribution networks

The largest gas DSO in the country is PSG sp. z o.o., a company belonging to ORLEN Group. In 2025, the *Development plan for meeting current and future gaseous fuel demand for the years 2024–2028*, developed by PSG sp. z o.o. and coordinated by the President of URE on 29 January 2024, was in force. Within the statutory deadline, that is by 30 April 2025, PSG sp. z o.o. submitted another draft development plan for meeting current and future gaseous fuel demand, developed for the years 2026–2030, for agreement with the President of URE.

The investment tasks planned by PSG sp. z o.o. have been divided into the following categories:

- 1) connection of new customers and new sources, along with the associated construction of new networks (24.04% of total capital expenditures) – the so-called group A:
 - a) connection of new customers (networks and service lines) – 17.70% of total capital expenditures;
 - b) connection of new sources (networks and service lines) – 6.34% of total capital expenditures,
- 2) expenditures on the modernisation and replacement of distribution network components, and the electrification/gasification of non-gasified areas (61.84% of total capital expenditures) – the so-called group B:
 - a) modernisation and replacement associated with improving the quality of services and/or growing capacity demand – 59.35% of total capital expenditures;
 - b) expansion into new areas (networks and service lines) and network extension in non-gasified areas – 2.49% of total capital expenditures,
- 3) other investments not included in groups A and B (14.12% of total capital expenditures) – the so-called group C, covering in particular tasks in the field of communications, metering, IT, buildings and structures, investment preparation, and the purchase of means of transport.

PSG sp. z o.o. plans to do the following for the period 2026–2030:

- 1) connect 117,881 new customers,
- 2) construct 6,574 km of new distribution network,
- 3) construct 203 new pressure reduction and metering stations,
- 4) construct 1 LNG regasification station,
- 5) modernise 9,588 km of distribution network,

- 6) modernise 370 pressure reduction and metering stations,
- 7) replace 4,938,639 gas meters and billing-and-metering systems,
- 8) connect a total of 57 gas sources to the distribution network, including 54 biomethane plants, one natural gas mine, and two gas collection centres.

In the development plan of PSG sp. z o.o., investment expenditures were agreed for the replacement of gas meters with SMART gas meters at 1.38 million exit points classified under tariff group 3. The schedule for this task concerns the period 2025–2026.

As a result of the analysis of investment expenditures, the President of URE recognised a level of financial investment expenditures lower by 7.87% compared to the level of investment expenditures requested by PSG sp. z o.o. in the draft development plan in question as justified for the years 2026–2030, while the physical scope of this plan was agreed in its entirety as requested. The President of URE agreed the development plan in question on 22 October 2025.

In addition, in 2025, the President of URE conducted proceedings regarding the agreement of 10 draft development plans of operators with fewer than 100,000 customers connected to the gas network. These operators conduct their activities mainly locally and mostly outside large urban areas; nevertheless, they constitute an important element of gas market liberalisation with respect to natural gas supplies to customers, including households. The value of the agreed capital expenditures in 2025 for the development plans of these operators covering the years 2026–2030 totalled PLN 127.3 million. The agreed expenditures primarily include investments in gas network expansion and the connection of new customers. Nine draft development plans were agreed, while one proceeding regarding the agreement of a draft development plan was discontinued due to the operator obtaining the status of a closed distribution system. For the period 2026–2030, this group of operators jointly plans to:

- 1) connect 3,972 customers,
- 2) construct 112 km of new distribution network,
- 3) construct 12 pressure reduction and metering stations,
- 4) construct 13 liquefied natural gas regasification stations,
- 5) modernise 1 km of distribution network,
- 6) modernise 34 pressure reduction and metering stations,
- 7) replace 6,099 gas meters and metering-and-billing systems.

Gaseous fuel storage system operator (Gas Storage Poland sp. z o.o.)

The obligation to coordinate the draft development plan for meeting current and future demand for storage facility capacities, prepared by the gas SSO, was introduced into the Energy Law Act by the Act of 5 August 2022¹³⁴.

The SSO prepares a development plan for meeting current and future demand for storage facility capacities for a 10-year period. This plan is subject to update every 2 years. Furthermore, the draft development plan takes into account, in particular:

1. the local spatial development plan,
2. the energy policy of the state,
3. a preventive action plan,
4. the development plan drawn up by the gas transmission system operator.

Fulfilling its obligation, Gas Storage Poland sp. z o.o., acting as the gas SSO, submitted a draft development plan for meeting current and future demand for storage facility capacities for the years 2026–2035 by a letter of 28 March 2025. The President of URE, acting in consultation with the minister competent for the management of energy raw materials, refused to agree this development plan due

¹³⁴ Article 1 para. 4 of the Act of 5 August 2022 Amending Certain Acts in order to Strengthen the State's Gas Security in Connection with the Situation on the Gas Market (Journal of Laws of 2022, item 1723), which added Article 16¹ to the Energy Law Act.

to the application's failure to meet the requirements resulting from Article 16¹ of the Energy Law Act. In particular, it was taken into account that both the current and the planned by the SSO level of storage capacities in the years 2026–2035 does not and will not ensure the possibility of maintaining mandatory natural gas stocks within the country in a quantity resulting from the demand forecasts for this gas. Currently, over 10% of these stocks are maintained in storage facilities outside the territory of the Republic of Poland. Demand forecasts confirm that the share of mandatory stocks maintained outside the territory of the Republic of Poland may increase if storage facilities are not sufficiently expanded. Due to the lack of storage capacities, the gas SSO was also forced to refuse many entities the provision of storage capacities in the expected volume, including for commercial purposes (that is, unrelated to mandatory stocks).

Among the identified problems, which support the inability to agree on the aforementioned draft plan, reference should also be made to the lack of appropriate assessment of the demand for storage capacities that would be able to ensure gas supplies for the needs of gas-fired power generation; this is particularly significant in connection with the increasing role of gas-fired generation sources in the power sector and the resulting assumed growth in natural gas consumption. In the assessment of the President of URE, proper assessment of the needs and coordination of development are necessary in this regard.

Works carried out by OGP Gaz-System S.A. on the construction of interconnections

In the last few years, significant investment projects of fundamental importance for the security of natural gas supply to Poland were implemented, involving the creation of new cross-border connections or the extension of the functionality of existing connections, which has enabled the company to become fully independent of supplies from the east. These projects, concerning interconnections completed by 2022, have been discussed in previous reports.

The effective National Ten-Year Network Development Plan provides for further expansion of the transmission system in order to improve its operational capabilities under the new flow pattern and thereby increase the security of supply to customers. The most important tasks currently being implemented include the connection of the floating storage and regasification unit (FSRU) planned in the Gulf of Gdańsk and the implementation of the so-called Central-Eastern Corridor, aimed at distributing gas from the northern direction within the country and supplying new customers. Among the significant tasks, reference should also be made to projects enabling the operation of the Yamal gas pipeline, owned by SGT EuRoPol GAZ S.A., within the new supply configuration, allowing for its full integration into the National Transmission System.

The process of expanding cross-border connections has been supported by EU programmes related to projects of common interest (PCI). The status of PCI is assigned by means of an agreement between the company planning to undertake the project and the Member State (or companies and Member States), with the participation of the EU institutions (in particular the European Commission). Key cross-border infrastructure projects connecting the energy systems of EU Member States that are intended to help the EU achieve its energy policy and climate objectives – affordable, secure and sustainable energy for all citizens and the long-term decarbonisation of the economy in accordance with the Paris Agreement – may be recognised as PCIs. PCI projects can benefit from the best practices arising from the TEN-E Regulation, which means, among others, that they can benefit from an accelerated process for obtaining permits. Under certain conditions, PCI status also makes it possible to apply for co-financing from the Connecting Europe Facility (CEF).

However, it should be highlighted that the process of supporting infrastructure projects by the European Commission has changed in recent years to reflect the objectives of decarbonising the EU economy and to incorporate the assumptions of the European Green Deal. Under the currently effective provisions of the TEN-E Regulation, the possibility of co-financing projects based on energy sourcing from fossil fuels, that is oil and natural gas, has been significantly restricted, and EU support

has been redirected towards offshore energy grids, hydrogen infrastructure, and the so-called smart grids. Gas projects will be eligible to receive EU support, but only until 2029 and on the condition that they are adapted to transmit or store decarbonised gases (e.g. hydrogen or biomethane). Consequently, a reduction in new investments for the construction of gas interconnections is observed. On the other hand, investments aimed at creating a hydrogen transmission system are in the phase of developing feasibility studies, preparing business plans, and conducting analyses prior to taking binding investment decisions.

On 1 December 2025, the European Commission published a delegated regulation regarding the second EU list of projects of common interest¹³⁵. The Nordic-Baltic Hydrogen Corridor project, for the implementation of which in the Polish part OGP Gaz-System S.A. is responsible, was included in the list. The purpose of the project is assumed to enable the transfer of hydrogen from Finland via the Baltic States and Poland to Germany. To this end, the gas transmission system operators: GAZ-SYSTEM (Poland), Gasgrid Finland (Finland), Elering (Estonia), Conexus Baltic Grid (Latvia), Amber Grid (Lithuania) and ONTRAS (Germany) signed a cooperation agreement and initiated work on a preliminary feasibility study. The Nordic-Baltic Hydrogen Corridor is designed to strengthen the region's energy security, reduce dependence on imported fossil energy and create a fast track for decarbonisation in significant sectors of the economy, including e.g. industry, transport, electricity and district heating to meet the REPowerUE 2030 targets. Promoters of the project are conducting technical, economic and financial analyses under a feasibility study, on the basis of which a decision will be taken to proceed with the development of the project and further activities such as the design, construction and commissioning of the transmission network. Co-financing from CEF funds in the amount of approximately EUR 6.8 million has been granted for the implementation of these tasks.

Furthermore, PCI status was also granted to the Germany-Poland hydrogen interconnection project, also known as the Pomeranian Green Hydrogen Cluster. This is a cross-border project implemented by the transmission system operators GAZ-SYSTEM S.A. and GASCADE Gastransport GmbH in the area of north-western Poland and north-eastern Germany. The venture aims to develop cross-border transmission infrastructure that will enable the integration of hydrogen production potential and demand on both sides of the border. It covers the Zachodniopomorskie and Lubuskie Voivodeships, as well as the Federal States of Mecklenburg-Western Pomerania and Brandenburg. The feasibility phase of the Pomeranian Green Hydrogen Cluster was covered by co-financing from the Connecting Europe Facility – Cross-border Renewable Energy Programme (CEF RES). The scope of activities includes a feasibility analysis of the venture, as well as an assessment of the rationale and conditions for the development of hydrogen infrastructure in the Polish-German border area.

The implementation of projects with PCI status and those applying for support under this procedure is subject to ongoing monitoring by the President of URE as part of the reconciliation of draft development plans and annual validation surveys in the course of ACER work.

Complaints against a transmission, storage, LNG or distribution system operator relating to their obligations under the directive

The President of URE is the body responsible for investigating complaints against energy companies, which may be submitted by any entity. In such a situation, the President of URE assesses whether the activity of a given company violated the provisions of the applicable acts of common law, that is EU regulations, acts, national regulations or decisions issued by the President of URE, including for example network codes.

¹³⁵ Commission Delegated Regulation (EU) 2026/764 of 1 December 2025 amending Regulation (EU) 2022/869 of the European Parliament and of the Council, as regards the Union list of projects of common interest and projects of mutual interest.

4.1.4. Implementation of network guidelines and codes

TAR NC

In 2025, works related to the implementation of the obligations under the TAR NC were continued. The Regulation entered into force on 6 April 2017, with the exception of Chapters VI and VIII, which have been applicable since 1 October 2017, and Chapters II, III and IV, which have been applicable since 31 May 2019. The TAR NC is one of the so-called 'network codes', the procedure for the development and adoption of which is provided for in Article 6 of Regulation 715/2009¹³⁶, which is binding in its entirety and directly applicable in all EU Member States.

The purpose of this regulation is to increase the transparency of the process of establishing gas transmission tariffs and to unify their structures across the EU. The TAR NC introduces consultation and publication obligations on the calculation methodology and technical parameters adopted for the calculation of transmission tariffs to ensure that users of the EU gas transmission systems have greater predictability in the level of fees and their comparability.

The implementation of the Code is expected to contribute to a more integrated European gas market, increased security of supply and the development of interconnections, which in turn can improve the competitiveness of European companies and reduce household gas bills.

The financial stability of gas transmission system operators is to be strengthened by the so-called regulatory account introduced by the TAR NC. Thanks to its application, it is possible to settle and include in the calculation of tariffs for gaseous fuels transmission services for subsequent years the difference between revenues planned before the beginning of the tariff year and revenues actually generated by the transmission system operator in that period, as part of the reconciliation of the regulatory account referred to in Article 20 of the TAR NC. Thanks to this mechanism, the risk of transferring the effects of incorrect forecasts regarding, among others, planned long-term or short-term capacity orders, to the transmission system users was eliminated. Until now, a reconciliation of the regulatory account for OGP GAZ-SYSTEM S.A. (for own network) was made as at 31 December of the years: 2019, 2020, 2021, 2022, 2023 and 2024. On the other hand, with respect to the network owned by SGT EuRoPol GAZ S.A., the balance of the regulatory account was reconciled for the first time as at 31 December 2023 and then as at 31 December 2024. More comprehensive information on this matter has been included in the decisions approving tariffs for gas fuel transmission services, available on the Office's website. The solutions concerning the regulatory account were introduced by the national legislator for operators other than the TSO, in the Gas Tariff Ordinance (§ 10 para. 6 and § 10a).

Tariffs for gaseous fuel transmission services are calculated in accordance with the requirements of the gas tariff regulation and the TAR NC, including the decisions on the reference price methodology and on multipliers, seasonal factors, and discounts for interruptible services and at LNG terminal entry points. The issuance of these decisions by the President of URE is preceded by consultations, conducted by the gas TSO in the first case, and by the President of URE in the second.

In the calculation of tariffs for gaseous fuel transmission services for 2025 and 2026, provided using the transmission network owned by OGP GAZ-SYSTEM S.A. and the network owned by SGT EuRoPol GAZ S.A.¹³⁷ the provisions of the *Reference Price Methodology No. 3/OGP for the own transmission network of OGP Gaz-System S.A. for the period: from 6:00 am on 1 January 2025 to 6 am on 1 January*

¹³⁶ Article 8(6)(k) of Regulation 715/2009 has been replaced with Article 71(2)(d) of Regulation 2024/1789. Pursuant to Article 88 of Regulation 2024/1789, references to the repealed Regulation 715/2009 are to be read as references to Regulation 2024/1789, according to the correlation table in Appendix III to this Regulation.

¹³⁷ OGP GAZ-SYSTEM S.A. acts as the gas transmission system operator for the network owned by the energy enterprise SGT EuRoPol GAZ S.A. based on the decision of the President of URE dated 17 November 2010, reference number: DPE-4720-4(8)/2010/6154/BT, and has been calculating tariffs for this network starting from the tariff for 2023.

2027¹³⁸ and the *Reference Price Methodology No. 3/SGT for the transmission network owned by the energy company System Gazociągów Tranzytowych EuRoPol GAZ S.A. with its registered office in Warsaw for the period from 6:00 am on 1 January 2025 to 6:00 am on 1 January 2027*¹³⁹, which constitute appendices to the decision of the President of URE, were applied.

In the administrative proceedings for the approval of the above methodologies of determining reference prices, the results of consultations conducted by OGP GAZ-SYSTEM S.A. in the period 31 August – 31 October 2023, concerning the years 2025–2026, with respect to its own transmission network¹⁴⁰ and the transmission network owned by SGT EuRoPol GAZ S.A.¹⁴¹, were used. The gas TSO was designated to conduct the aforementioned consultations by the President of URE in the decision of 16 July 2018, pursuant to Article 5(1), Article 26(1), and Article 27(1) of the TAR NC.

Consultations on the reference price methodology for the years 2027–2031¹⁴², covering the elements specified in Article 26(1) of the TAR NC, for a single combined entry/exit system for natural gas, were conducted between 1 September and 1 November 2025.

In the *"Consultation Document for the Entry-Exit System within the territory of the Republic of Poland for the years 2027-2031"*, it was assumed that both separate entry/exit systems (NTS and TGPS) would be merged into a single combined natural gas entry/exit system within the territory of the Republic of Poland, for which the same reference price methodology will be applied jointly (a uniform network tariff will be in force¹⁴³).

The creation of a single combined natural gas entry/exit system, covering OGP GAZ-SYSTEM S.A.'s own transmission network for high-methane E gas and low-methane Lw gas as well as the transmission network owned by the enterprise SGT EuRoPol GAZ S.A.¹⁴⁴ results in the necessity to establish an effective inter-TSO compensation mechanism (ITCNTS/TGPS).

Upon completion of the consultations, the gas TSO published the responses received and their summary¹⁴⁵. Concurrently, pursuant to the provisions of Article 27(3) of the TAR NC, ACER published and sent to the Office and OGP GAZ-SYSTEM S.A. the conclusions of the analysis of the consultation document, carried out in accordance with para. 2 of the aforementioned provision¹⁴⁶.

The results of the aforementioned consultations were taken into account in the decision of the President of URE approving in 2026 the reference price methodology for the period from 2027 for a single combined natural gas entry/exit system. The decision was published on URE website and transmitted to ACER and the European Commission.

Between 1 September and 1 November 2025, the President of URE consulted for the eighth time¹⁴⁷ on the matters referred to in Article 28 of the TAR NC, concerning, among others, multipliers, seasonal

¹³⁸ URE Bulletin – Gaseous Fuels no. 50 (2847) of 11 April 2024, <https://bip.ure.gov.pl/bip/taryfy-i-inne-decyzje-b/inne-decyzje-informacji/4574,Inne-decyzje-informacje-sprawozdania-opublikowane-w-2024-r.html>

¹³⁹ URE Bulletin – Gaseous Fuels no. 44 (2841) of 21 March 2024, <https://bip.ure.gov.pl/bip/taryfy-i-inne-decyzje-b/inne-decyzje-informacji/4574,Inne-decyzje-informacje-sprawozdania-opublikowane-w-2024-r.html>

¹⁴⁰ <https://www.gaz-system.pl/pl/dla-klientow/uslugi-w-ksp/taryfa-ksp/nc-tar.html>

¹⁴¹ <https://www.gaz-system.pl/pl/dla-klientow/uslugi-w-sgt/taryfa-sgt/nc-tar.html>

¹⁴² <https://www.gaz-system.pl/pl/dla-klientow/uslugi-w-ksp/taryfa-ksp/nc-tar.html>

¹⁴³ It should be borne in mind that in Regulation 2024/1789 the term "tariff" is used to mean a "fee rate", whereas pursuant to Article 3 para. 17 of the Energy Law Act, a "tariff" means "a set of prices and fee rates as well as the terms and conditions for their application, developed by an energy enterprise and introduced as binding for the customers specified therein in the manner prescribed by the Act", meaning that it is a document containing, among others, "fee rates", which is approved by the President of the URE.

¹⁴⁴ OGP GAZ_SYSTEM S.A. acts as the gas transmission system operator for the SGT EuRoPol GAZ S.A. transmission network based on the decision of the President of URE of 17 November 2010, reference number: DPE-4720-4(8)/2010/6154/BT.

¹⁴⁵ <https://www.gaz-system.pl/pl/dla-klientow/uslugi-w-ksp/taryfa-ksp/nc-tar.html>

¹⁴⁶ <https://www.acer.europa.eu/sites/default/files/documents/Publications/ACER-Gas-Tariff-Report-Poland-2025.pdf>

¹⁴⁷ <https://www.ure.gov.pl/pl/biznes/taryfy-zalozenia/mnozники-wspolczynniki-sezonow-2/12842,Konsultacje-w-zakresie-rabatow-mnozownikow-i-wspolczynnikow-sezonowych-do-taryfy-n.html>

factors, discount levels at LNG terminal entry points, and discounts applied to calculate reserve prices for standard interruptible capacity products. For the first time, these consultations concerned a single combined natural gas entry/exit system, covering OGP GAZ-SYSTEM S.A.'s own network and the network of the enterprise SGT EuRoPol GAZ S.A.

The main change planned for 2027 concerned the reduction of the discount at the entry point to the natural gas transmission system from the LNG terminal to 40%. The issue of a gradual reduction of this discount (from the 100% level applied in 2025) was the subject of analyses carried out for the purposes of the previous consultations – concerning 2026. As a result, the consultation document for 2026¹⁴⁸ proposed a gradual reduction of the discount at the LNG terminal entry point: to 70% in 2026 and to 40% in 2027, and the reduced value of this discount for 2026 was approved in the Information of the President of URE No. 9/2025 of 18 February 2025¹⁴⁹.

Additional information on this subject can be found in the Consultation Document available on the Office's website¹⁵⁰.

Pursuant to Article 28(2) of the TAR NC, the aforementioned consultation shall take place during each tariff period. As defined in Article 3(23) of the TAR NC, a tariff period means the time period during which a particular level of reference price is applicable, which minimum duration is one year and maximum duration is the duration of the regulatory period. As the tariffs for gas transmission services are approved for a period of 12 months, this consultation is carried out every year.

Between 1 September and 1 November 2025, for the first time, the President of URE conducted consultations¹⁵¹ on the inter-TSO compensation mechanism (ITC NTS/TGPS), referred to in Article 10(3) of the TAR NC, for a single combined natural gas entry/exit system. During the consultations, five opinions from interested entities were received, including the position of one industry organisation (Energy Traders Europe).

The ITC NTS/TGPS mechanism will be applied between the transmission system operator for OGP GAZ-SYSTEM S.A.'s own high-methane and nitrogenous natural gas transmission network and the transmission system operator for the transmission network owned by SGT EuRoPol GAZ S.A. operating under the ISO model¹⁵².

As already mentioned, the creation of a single combined natural gas entry/exit system results in the necessity to establish an effective inter-TSO compensation mechanism, which is to ensure that each operator (NTS and TGPS) recovers its allowed revenue from transmission activity, lost as a result of the liquidation of interconnection points (between the NTS and TGPS) and the subsequent lack of revenues at these points.

Pursuant to the provisions of Article 10(5) of the TAR NC, at the same time as the final consultation in accordance with Article 26, the national regulatory authority shall conduct a consultation on the principles of an effective inter-transmission system operator compensation mechanism referred to in para. 3 and its consequences on the tariff levels. The inter-transmission system operator compensation mechanism shall be applied in accordance with Article 41(6)(a) of Directive 2009/73/EC¹⁵³ and published together with the consultation responses received. Thus, the President

¹⁴⁸ <https://www.ure.gov.pl/pl/biznes/taryfy-zalozenia/mnozники-wspolczynniki-sezonow-1/12236,Mnozники-wspolczynniki-sezonowe-i-rabaty-na-2026-r-art-28-NC-TAR.html>

¹⁴⁹ <https://www.ure.gov.pl/pl/biznes/taryfy-zalozenia/mnozники-wspolczynniki-sezonow-1/12236,Mnozники-wspolczynniki-sezonowe-i-rabaty-na-2026-r-art-28-NC-TAR.html>

¹⁵⁰ <https://www.ure.gov.pl/pl/biznes/taryfy-zalozenia/mnozники-wspolczynniki-sezonow-2/12842,Konsultacje-w-zakresie-rabatow-mnozownikow-i-wspolczynnikow-sezonowych-do-taryfy-n.html>

¹⁵¹ <https://www.ure.gov.pl/pl/biznes/taryfy-zalozenia/itc-kspsgt-2027-2031-art-105-n/12843,Konsultacje-w-zakresie-Mechanizmu-rozliczen-miedzyoperatorskich-ITC-KSPSGT-2027-.html>

¹⁵² Independent System Operator.

¹⁵³ Directive 2009/73/EC of the European Parliament and of the Council of 13 July 2009 concerning common rules for the internal market in natural gas and repealing Directive 2003/55/EC (EU OJ L 211/94, as amended).

of URE is obliged to prepare a consultation document and conduct consultations on the inter-transmission system operator compensation mechanism for the period for which the reference price methodology is being consulted by the Operator.

In 2025, ACER continued its work on the ACER Efficiency Comparison (AEC)¹⁵⁴ of European gas TSOs, which is carried out pursuant to Article 19(2) of Regulation 2024/1789¹⁵⁵. The participation in this analysis by regulatory authorities and the gas TSOs, including the submission of all necessary data, is mandatory.

Between 17 June and 17 July 2025, ACER conducted public consultations¹⁵⁶ dedicated to the AEC, under which all stakeholders, in particular the TSOs, had the opportunity to submit comments and present their positions on the proposed AEC methodology. Representatives of the President of URE also participated in the work on the AEC, including the organised workshops.

On the website¹⁵⁷ dedicated to the recent ACER workshop, information on the AEC consultations, introductory materials for cost efficiency analyses, and a video recording of the workshop were posted. The workshop was organised during the ACER public consultations, which enabled an exchange of views and a discussion on the AEC before stakeholders took their final positions within the consultation framework.

The results of the first comparison will be published by ACER by 5 August 2027, and subsequent ones every 4 years. They will be taken into account by national regulators when determining the regulated revenue of the gas TSOs, since pursuant to Article 19(2) of Regulation 2024/1789 “[...] *When periodically setting the allowed or target revenue of transmission system operators, the relevant regulatory authorities shall take into account such comparison and national circumstances*”.

In connection with the above, the reference price methodology for the period from 2027 contains provisions enabling the efficiency result of the TSO, determined in the AEC, to be appropriately taken into account when setting the regulated revenue.

Furthermore, Article 19(1) of Regulation 2024/1789¹⁵⁸ introduced new publication obligations regarding the transparency of transmission tariffs and regulated revenue, which may be implemented by the regulatory authority or the transmission system operator. By a decision of 18 July 2025, the President of URE designated the gas TSO as the entity responsible for the publication of the information referred to in Article 19(1) of Regulation 2024/1789 with respect to its own transmission network and the transmission network owned by the enterprise – SGT EuRoPol GAZ S.A., where OGP GAZ-SYSTEM S.A. acts as the gas transmission system operator. The first publication carried out by the TSO concerned the tariffs for 2026 and is available on its website¹⁵⁹.

The designation of the operator as the entity responsible for the aforementioned publications resulted from the fact that, by a decision of 27 October 2017, the operator had been designated as the entity responsible for the publication of the information referred to in Article 30 of the TAR NC with respect to both transmission networks. In turn, an analysis of the scope of information published

¹⁵⁴ ACER Efficiency Comparison – <https://www.acer.europa.eu/gas/efficiency-comparison-gas-TSOs>

¹⁵⁵ Regulation (EU) 2024/1789 of the European Parliament and of the Council of 13 June 2024 on the internal markets for renewable gas, natural gas and hydrogen, amending Regulations (EU) No 1227/2011, (EU) 2017/1938, (EU) 2019/942 and (EU) 2022/869 and Decision (EU) 2017/684 and repealing Regulation (EC) No 715/2009 (EU OJ L of 15.07.2024).

¹⁵⁶ <https://www.acer.europa.eu/public-consultation/pc2025g04-public-consultation-acer-gas-tso-cost-efficiency-comparison-draft-methodology>

¹⁵⁷ <https://www.acer.europa.eu/public-events/workspace/workshop-acers-new-cost-efficiency-comparison-eu-gas-tsos>

¹⁵⁸ “1. From 5 August 2025, the relevant regulatory authority shall ensure the transparency of the methodologies, parameters and values used to determine allowed or target revenue of transmission system operators. The regulatory authority shall publish the information referred to in Annex I, or shall require the publication by the relevant transmission system operator subject to the protection of data considered by the relevant regulatory authority to be commercially sensitive. That information shall be made available in a freely accessible, downloadable and read-only format and, to the extent possible, in one or more commonly understood languages”.

¹⁵⁹ <https://www.gaz-system.pl/pl/dla-klientow/uslugi-w-ksp/taryfa-ksp/nc-tar.html>

pursuant to Article 30 of the TAR NC and the scope of information published pursuant to Article 19(1) of Regulation 2024/1789 indicated that this information significantly overlaps. Consequently, the coordination of these publications by a single entity – namely the operator – is necessary.

CAM NC

In accordance with the CAM NC, the transmission system operator shall make the maximum technical capacity available at interconnection points. The gas TSO shall regularly perform an analysis of the technical capacity at the above-mentioned points in order to maximise the capacity made available to market participants. In fulfilling the provisions of Article 6 of the CAM NC, the TSO shall agree the results of the above-mentioned analyses with the system operators cooperating in accordance with the Regulation.

Transmission system users book transmission capacities at cross-border interconnections through auctions that take place on the terms established in the CAM NC. In 2025, the capacity booking process at entry/exit points to/from the Polish natural gas transmission system took place on the GSA and RBP auction platforms. The table below presents a summary of natural gas flows at individual interconnection points in Poland in 2025.

Table 29. Maximum transmission capacity offered by the gas TSO and capacities booked by system users at interconnection points in 2025 (including the TGPS system) [MWh/year]

System operator's name	Operator's country	Interconnection point	Supply direction	Total transmission capacity		Reserved transmission capacity	
				firm	interruptible	firm	interruptible
OGP GAZ-SYSTEM S.A.	Poland/TGPS	PWP (en)	Poland	101 315 733	30 507 629	598 344	0
OGP GAZ-SYSTEM S.A.	Poland	PWP (ex)	Poland/SGT	0	101 315 733	0	0
ONTRAS	Germany	GCP GAZ-SYSTEM/ONTRAS (en)	Poland	17 776 668	12 697 620	14 609 386	15 072
ONTRAS	Germany	GCP GAZ-SYSTEM/ONTRAS (ex)	Germany	31 746	17 776 668	1 530	58 680
GasNet s.r.o.	Czech Republic	Branice Czechy	Poland	15 794	15 794	0	0
Net4Gas	Czech Republic	Cieszyn (en)	Poland	6 593 915	6 568 352	6 525 394	24
Net4Gas	Czech Republic	Cieszyn (ex)	Czech Republic	3 959 520	786 998	0	0
GasNet, s.r.o.	Czech Republic	Zlate Hory	Poland	49 008	231 487	0	0
GasNet, s.r.o.	Czech Republic	Zlate Hory	Czech Republic	0	0	0	0
Eustream	Slovakia	Vyrava (en)	Poland	63 488 100	6 348 810	5 577 535	0
Eustream	Slovakia	Vyrava (ex)	Slovakia	52 743 960	5 274 396	2 474	0
LLC Gas TSO of Ukraine	Ukraine	GCP GAZ-SYSTEM/UA TSO (en)	Poland	49 494 000	48 999 060	54 555	0
LLC Gas TSO of Ukraine	Ukraine	GCP GAZ-SYSTEM/UA TSO (ex)	Ukraine	24 367 320	52 549 882	23 479 218	4 608
AB Amber Grid	Lithuania	Santaka (en)	Poland	21 195 258	6 874 997	5 513 334	0
AB Amber Grid	Lithuania	Santaka (ex)	Lithuania	26 762 676	18 948 756	1 309 499	0
Energinet	Denmark	FAXE (Baltic Pipe entry)	Poland	117 480 360	78 696 643	102 232 232	24
Energinet	Denmark	FAXE (Baltic Pipe exit)	Denmark	33 750 002	3 375 000	0	0

System operator's name	Operator's country	Interconnection point	Supply direction	Total transmission capacity		Reserved transmission capacity	
				firm	interruptible	firm	interruptible
GASCADE Gastransport Gmbh	Germany	Mallnow TGPS (en)	Poland	101 315 733	21 939 280	598 224	0
GASCADE Gastransport Gmbh	Germany	Mallnow TGPS (ex)	Germany	0	101 315 733	0	120

Source: URE's own analysis based on data from OGP GAZ-SYSTEM S.A.

Table 30. Unbooked transmission capacities, booked non-utilised capacities and actual transmission at interconnection points in 2025 (including the TGPS system) [MWh/year]

System operator's name	Operator's country	Interconnection point	Supply direction	Non-booked transmission capacity		Non-utilised booked transmission capacity		Transmission completed – firm and interruptible capacity
				firm	interruptible	firm	interruptible	
OSGT GAZ-SYSTEM S.A.	Poland /TGPS	IP (en)	Poland	100 717 389	30 507 629	16 525	0	581 819
OSGT GAZ-SYSTEM S.A.	Poland	IP (ex)	Poland/TGPS	0	101 315 733	0	0	0
ONTRAS	Germany	GCP GAZ-SYSTEM/ONTRAS (en)	Poland	3 167 282	12 682 548	1 403 519	15 072	13 205 867
ONTRAS	Germany	GCP GAZ-SYSTEM/ONTRAS (ex)	Germany	30 216	17 717 988	0	9 738	50 472
GasNet s.r.o.	Czech Republic	Branice Czechy	Poland	15 794	15 794	0	0	3 522
Net4Gas	Czech Republic	Cieszyn (en)	Poland	68 521	6 568 328	2 777 499	24	3 747 895
Net4Gas	Czech Republic	Cieszyn (ex)	Czech Republic	3 959 520	786 998	0	0	0
GasNet, s.r.o.	Czech Republic	Zlate Hory	Poland	49 008	231 487	0	0	0
GasNet, s.r.o.	Czech Republic	Zlate Hory	Czech Republic	0	0	0	0	0
Eustream	Slovakia	Vyrava (en)	Poland	57 910 565	6 348 810	3 304 540	0	2 272 995
Eustream	Slovakia	Vyrava (ex)	Slovakia	52 741 486	5 274 396	26	0	2 448
LLC Gas TSO of Ukraine	Ukraine	GCP GAZ-SYSTEM/UA TSO (en)	Poland	49 439 445	48 999 060	1 900	0	52 655
LLC Gas TSO of Ukraine	Ukraine	GCP GAZ-SYSTEM/UA TSO (ex)	Ukraine	888 102	52 545 274	778 753	4 608	22 700 465
AB Amber Grid	Lithuania	Santaka (en)	Poland	15 681 924	6 874 997	544 660	0	4 968 674
AB Amber Grid	Lithuania	Santaka (ex)	Lithuania	25 453 177	18 948 756	744 487	0	565 012
Energinet	Denmark	FAXE (Baltic Pipe entry)	Poland	15 248 128	78 696 619	5 274 175	24	96 958 057
Energinet	Denmark	FAXE (Baltic Pipe exit)	Denmark	33 750 002	3 375 000	0	0	0
GASCADE Gastransport Gmbh	Germany	Mallnow TGPS (en)	Poland	100 717 509	21 939 280	16 405	0	581 819
GASCADE Gastransport Gmbh	Germany	Mallnow TGPS (ex)	Germany	0	101 315 613	0	120	0

Source: URE's own analysis based on data from OGP GAZ-SYSTEM S.A.

Incremental capacity projects

On 7 July 2025, OGP GAZ-SYSTEM S.A. launched the fifth non-binding market demand assessment for incremental capacity between the Polish and neighbouring transmission systems, which lasted for eight weeks, that is, until 1 September 2025. This assessment is conducted as part of the process for obtaining incremental capacity (the so-called incremental procedure) based on the requirements of the CAM NC.

Based on the demand submissions received as part of the assessment, OGP GAZ-SYSTEM S.A. and the neighbouring transmission system operators developed joint market demand assessment reports. The reports estimated the potential demand for incremental capacity within a given system at entry-exit points and determined whether an incremental capacity project should be initiated.

Based on the non-binding submissions received, a decision was made that as a result of the procedure initiated in 2025, an incremental capacity project proposal will be prepared only for the entry-exit points of the systems of OGP GAZ-SYSTEM S.A. and the Ukrainian LLC operator "Gas Transmission System Operator of Ukraine".

Accordingly, in the upcoming design phase, both operators will conduct technical analyses based on the submitted demand for transmission capacity increases. Subsequently, at a later stage of the procedure, they will present an incremental capacity project proposal for market consultation.

BAL NC

Within the E gas balancing zone, in 2025 OGP GAZ-SYSTEM S.A. undertook balancing actions on TGE S.A. (Polish Power Exchange) under short-term standardised products, within which it purchased 983 GWh (149 balancing actions) and sold 277 GWh (44 balancing actions).

Within the TGPS and Lw balancing zone, OGP GAZ-SYSTEM S.A. did not undertake balancing activities on TGE S.A. in 2025.

In 2025, as in previous years, the President of URE approved gas trading in adjacent balancing zones and gas transmission to and from these balancing zones in order to perform balancing tasks¹⁶⁰. However, in 2025, the gas TSO did not undertake balancing activities in the adjacent balancing zone.

Balancing services were applied at the Branice interconnection point on the Polish-Czech border. The rules for their use are set out in Article 8 of the BAL NC and the contract for the provision of these services, which is concluded by the TSO after a non-discriminatory tendering procedure. As part of balancing services at the Branice entry point, 3.5 GWh were supplied to the transmission system in 2025.

OGP GAZ-SYSTEM S.A. continued to apply the mechanism to ensure cost neutrality introduced by the TSO on 1 June 2020 by virtue of the decision of the President of URE of 27 May 2020 approving the "*Mechanism to ensure cost neutrality of balancing activities of Gas Transmission Operator GAZ-SYSTEM S.A.*". This document sets out the methodologies for calculating fees related to the cost neutrality of the operator's balancing activities.

On 1 February 2025 at 6:00 am, the methodology of calculating fees related to balancing neutrality, included in the document "*Mechanism to ensure cost neutrality of balancing activities of Gas Transmission Operator Gaz-System S.A. in accordance with Commission Regulation (EU) No. 312/2014 of 26 March 2014 establishing a network code on gas balancing of transmission networks*", approved by decision of 8 November 2024 by the President of URE.

¹⁶⁰ <https://www.ure.gov.pl/pl/paliwa-gazowe/europejski-rynek-gazu-1/decyzje/12818,GAZ-SYSTEM-otrzymal-zgode-Prezesa-URE-na-obrot-gazem-na-sasiadujacych-obszarach-.html>

The rules for g balancing, including the methodology for calculating imbalance fees and additional information on balancing the NTS¹⁶¹ and TGPS¹⁶² are available on OGP GAZ-SYSTEM S.A.'s website.

The TSO provides the Shipper with information on the quantities delivered and withdrawn during the gas day. Information on the estimated value of the imbalance is provided to particular Shippers individually through the Information Exchange System (IES):

- for the first 4 hours of a given gas day, information is provided to the Shipper by 2:00 pm of a given gas day,
- for the first 8 hours of a given gas day, information is provided to the Shipper by 6:00 pm of a given gas day,
- for a given gas day, information is provided to the Shipper by 12:00 pm of the next gas day.

The Shipper receives in the IES the values of the operative allocation for all entry and exit points at which it is allocated, as well as information about the imbalance status.

In addition, OGP GAZ-SYSTEM S.A. provides the Shipper with forecasts of the gas DSO in the scope of the Shipper's non-daily metered off-takes (the forecast on the D-1 day is provided by 1:00 pm, two updates of the forecast during the day are made available by 2:00 pm and 8:00 pm on a given gas day).

Billing data on the quantities delivered and received by the Shipper are provided immediately after the end of the month to which the settlement relates.

INT NC

In 2025, OGP GAZ-SYSTEM S.A. continued its cooperation with the following operators: Czech NET4GAS s.r.o., German GASCADE Gastransport GmbH and Ontras Gastransport GmbH, Ukrainian LLC "Gas Transmission System Operator of Ukraine", Lithuanian AB Amber Grid, Slovakian Eustream a.s. and Danish Energinet SOV in accordance with the provisions of inter-operator agreements.

In 2025, the company continued to comply with the following obligations in accordance with the INT NC:

- publication of the points in which the current operational balancing account (OBA) agreements apply¹⁶³,
- implementation of OBA agreements containing detailed arrangements on: nomination matching rules, rules for allocation of gas quantities, communication procedure in case of exceptional events,
- promoting common solutions for the electronic exchange of information related to the execution of transmission contracts, which is based on the electronic document interchange (EDI) standard, in the version developed for the gas industry called EDIG@S¹⁶⁴,
- promotion of common data exchange solutions based on the AS4 protocol¹⁶⁵,
- publication of daily data (in accordance with Article 16 of the INT NC) for each interconnection point regarding Wobbe index and calorific value¹⁶⁶.

All the above-mentioned information is also available in English.

¹⁶¹ <https://www.gaz-system.pl/pl/dla-klientow/uslugi-w-ksp/przesyl-gazu-ksp/bilansowanie-ksp.html>

¹⁶² <https://www.gaz-system.pl/pl/dla-klientow/uslugi-w-sgt/przesyl-gazu-sgt/bilansowanie-sgt.html>

¹⁶³ <https://www.gaz-system.pl/pl/dla-klientow/informacje-rynkowe/wymiana-danych.html>

¹⁶⁴ <https://www.gaz-system.pl/pl/dla-klientow/informacje-rynkowe/wymiana-danych.html>

¹⁶⁵ <https://www.gaz-system.pl/pl/dla-klientow/informacje-rynkowe/wymiana-danych.html>

¹⁶⁶ <https://swi.gaz-system.pl/publications/sgt/gcv/daily>

4.2. COMPETITION AND MARKET FUNCTIONING

4.2.1. Wholesale market

Trading in natural gas

The national wholesale gas market comprises all transactions concluded within the territory of the Republic of Poland and at interconnection points with neighbouring transmission systems, the subject of which are wholesale energy products related to natural gas. This trading takes place, in particular, on TGE S.A., the OTF, and in over-the-counter (OTC) trade.

Trading on the Polish wholesale gas market comprises in particular:

- contracts for the sale and supply of natural gas, with physical delivery or financial settlement in the Polish transmission or distribution system, to entities that are not final customers,
- supply contracts to the largest final customers (e.g. the chemical industry or professional power generation), if their annual consumption capacity exceeds the threshold of 600 GWh (contracts below this threshold constitute an element of the retail market and do not qualify as wholesale energy products – pursuant to the provisions of the REMIT Regulation).

At the end of 2025, 190 entities held a licence for trade in gaseous fuels, compared to 185 at the end of 2024. Among them, 93 enterprises actively participated in wholesale natural gas trading, for which gaseous fuel transmission services were provided within the transmission pipeline system.

Gas trading enterprises from the ORLEN Group acquired 375.1 TWh of natural gas, while those from outside the ORLEN Group acquired 99 TWh. The remaining data regarding wholesale gas sales by trading companies can be found in the table below.

Table 31. Volumes of gas acquired and sold as wholesale trade by the surveyed trading companies in 2025 [TWh]

	Total	ORLEN Group	Other trading companies
Gas acquisition (purchase and production) ¹⁶⁷	474.1	375.1	99.0
Wholesale of gas	191.9	142.2	49.7

Source: Data from the Ministry of Climate and Environment and URE¹⁶⁸.

In 2025, the total volume of gas acquired from purchases and production on the wholesale market increased by 14% compared to the previous year. This growth resulted from a 9% increase in volume within ORLEN Group companies and a 35% increase in other trading companies. During the same period, total wholesale gas sales increased by 37%. A 19% increase was recorded in ORLEN Group companies, while the volume of wholesale sales in other trading companies increased by 141%.

Natural Gas Exchange

The sale and purchase of gaseous fuels on the Polish wholesale market takes place primarily on the commodity exchange operated by TGE S.A. (including the Commodity Market – CM and as of 1 May 2020 – Organised Trading Facility – OTF). Exchange market participants are mainly gaseous fuel trading companies and the largest final customers which can act independently after concluding a relevant agreement with TGE S.A., becoming members of CM or OTF, respectively, or through brokerage houses or through other entities having the status of a CM and OTF member from its own corporate group

¹⁶⁷ The volume of gas acquisition does not include acquisition for own consumption by the monitored trading companies, including gas acquisition by energy enterprises that are simultaneously large final customers.

¹⁶⁸ 121 entities submitting the Report on the Activities of Gas Enterprises GAZ-3 in 2025 were taken into account.

which may conclude transactions for the benefit of other entities belonging to the same corporate group.

Stock exchange trading takes place by concluding sales agreements (transactions) between members of CM and OTF.

In 2025, TGE S.A. operated the following markets for the sale of gaseous fuels: the Intraday Market (IDMg), the Day-Ahead Market (DAMg) and the Gas Forwards Market (GFM) of the Organised Trading Facility (OTF).

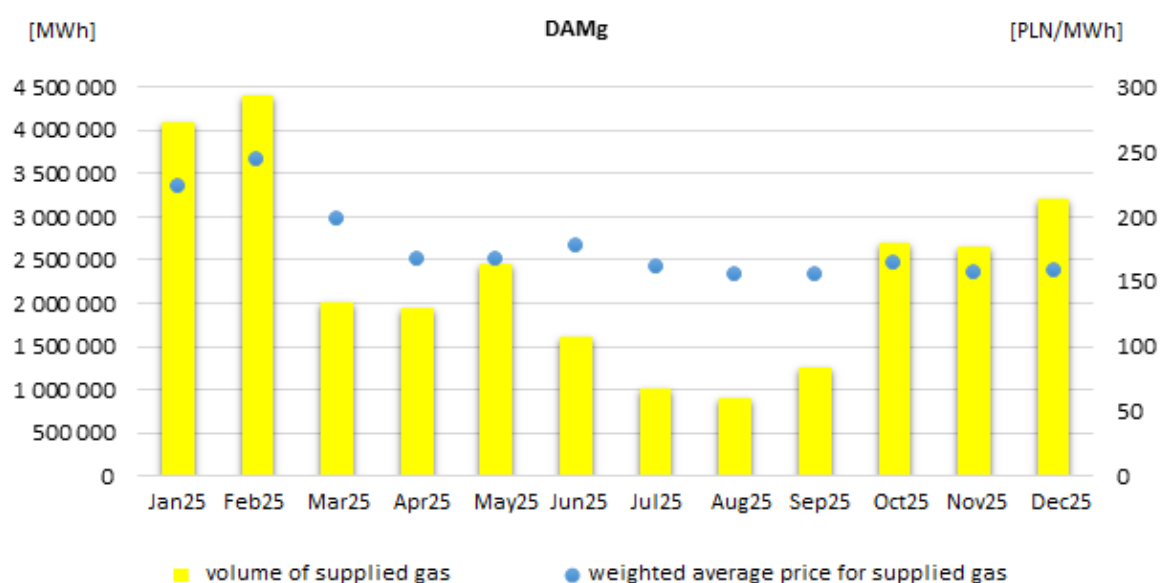
The subject of trading on GFM OTF was the supply of gas in equal quantities during all hours of the delivery period in accordance with the instrument standard (weekly, monthly, quarterly, seasonal and annual).

The supply of gas in equal volumes at all hours of the delivery day is subject of trade on the DAMg. It is a base instrument and one contract corresponds to the delivery of 1 MWh of gas in each hour of the delivery day. Trading is conducted during one day preceding the date of delivery in the continuous trading system. In addition, the subject of trading on the day-ahead gas market are weekend instruments with the delivery period from 6:00 am on Saturday to 6:00 am on Monday (gas weekend) in the equal amount of 1 MWh for each hour of the contract execution deadline. Quotations of the weekend instrument are carried out for two days preceding the delivery period.

Trading on the IDMg is carried out in the continuous trading system.

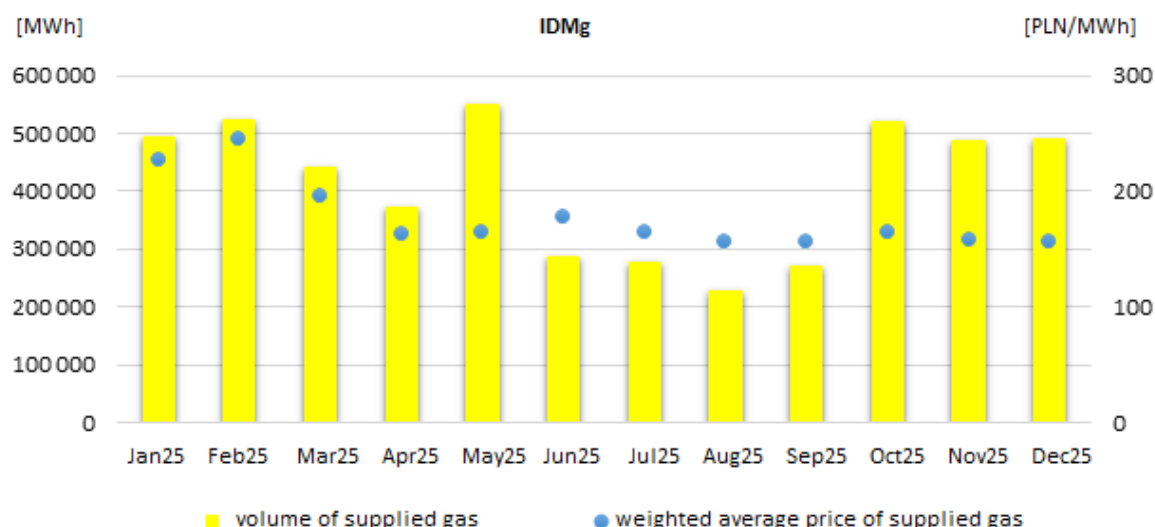
The figures below show the volume and price of gas supplied under contracts concluded on the Day-Ahead Market, Intra-day Market and Gas Forward Market (GFM OTF).

Figure 22. Volume and weighted average monthly price of gas supplied as a result of the performance of contracts concluded on the Day-Ahead Market (DAMg) in 2025



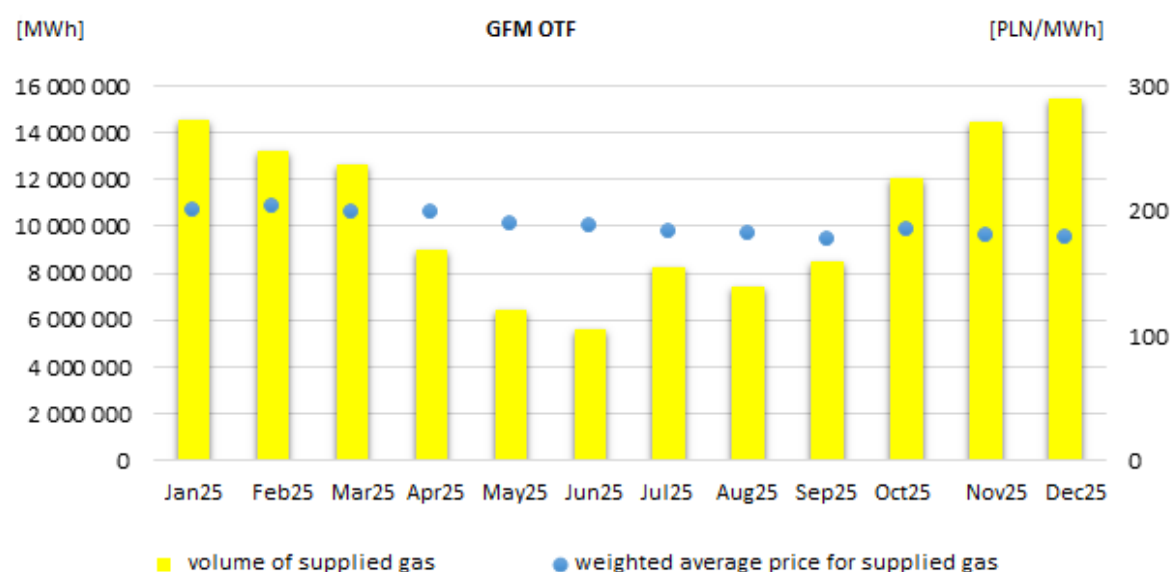
Source: In-house analysis based on TGE S.A. data.

Figure 23. Volume and weighted monthly average price of gas supplied as a result of the performance of contracts concluded on the Intra-Day Market for gas (IDMg) in 2025



Source: In-house analysis based on TGE S.A. data.

Figure 24. Volume and weighted average monthly price of gas supplied as a result of the execution of contracts concluded on the Gas Forward Market on the Organised Trading Facility (GFM OTF) in 2025



Source: In-house analysis based on TGE S.A. data.

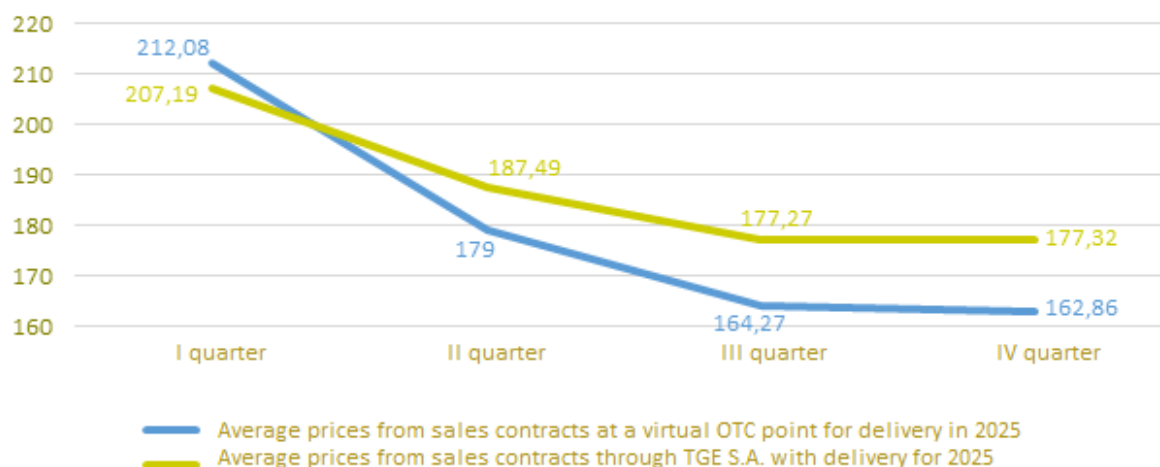
In 2025, as a result of the performance of contracts concluded on TGE S.A., throughout the entire quotation period of a given type of contract, 160,758,618 MWh of natural gas was delivered at an average price of 188.83 PLN/MWh (28,260,317 MWh on the DAMg market at an average price of 186.98 PLN/MWh, 4,947,814 MWh on the IDMg market at an average price of 180.41 PLN/MWh and 127,550,487 MWh on the forward market at an average price of 189.56 PLN/MWh).

Compared to 2024, a 17% higher volume of natural gas was delivered as a result of executing contracts concluded on TGE S.A., at an average price lower by 24%. On the DAMg, the delivery volume increased by 32%, at an average price higher by 4%, while on the IDMg, the volume increased by 29%, at an average price higher by 5%. In turn, on the Gas Forward Market of the Organised Trading Facility (GFM OTF), a 14% higher volume of gas was delivered, at an average price lower by 28%.

Trading in high-methane natural gas at an OTC virtual point

The President of URE also monitored transactions concluded at a virtual point on the OTC market. According to the definition from the OGP GAZ-SYSTEM S.A.'s TNC, it is a point in a given balancing zone of the transmission system with an unspecified physical location, where gaseous fuel is traded. As a result of the performance of contracts concluded at this point on the OTC market, regardless of the date of the contract, 24,045,564 MWh of natural gas was delivered in 2025 at the weighted average annual price of 179.69 PLN/MWh. Prices in individual quarters are as shown in the figure below.

Figure 25. Comparison of average natural gas prices from sales contracts at a virtual OTC point and sales through TGE S.A. in individual quarters of 2025 [PLN/MWh]



Source: URE.

Compared to 2024, a 4% lower volume of natural gas was delivered as a result of executing contracts concluded at the virtual point on OTC market, at an annual weighted average price lower by 6%.

4.2.2. Retail market

The retail market for gaseous fuels in Poland comprises the sale of natural gas to final customers, carried out by energy enterprises conducting business activities in the field of gaseous fuel trade. This sale takes place using the infrastructure of distribution and transmission systems on a Third-Party Access (TPA) basis, in accordance with the provisions of the Energy Law Act, in particular Article 4 para. 2 and Article 4j.

In this chapter, the sale of gaseous fuels is understood as the volume of gas sold by trading companies to final customers. The data was obtained as part of the annual survey of enterprises conducting activities in the field of gaseous fuel supply.

The presented data do not include gas acquired directly by entities utilising gaseous fuels for their own consumption that do not conduct business activities in the field of gaseous fuel supply and do not hold a licence. Consequently, the actual consumption of gas in the economy may be higher than the sales volume reported in this survey.

Data regarding the number of final customers and the number of gas consumption points (GCPs) may differ from the data presented by gas DSOs and the TSO, which results from a different reporting scope. Gas system operators register all GCPs functioning within the system, whereas supply companies report customers resulting from concluded contracts for the sale of gaseous fuel. Consequently, a single customer may be associated with more than one supplier.

Market entity structure

In 2025, the number of active gaseous fuel suppliers¹⁶⁹ was 85, compared to 82 in 2024. In the household segment, the number of active suppliers remained unchanged at 26.

The change in the number of active entities resulted both from the entry of new enterprises into the market and the withdrawal of some entities from business activities, as well as organisational changes within energy enterprises.

The market share structure indicates a high concentration level of gaseous fuel sales. The five largest suppliers hold a total market share of 90.64%, with this share amounting to 96.69% in the household segment and 88.28% in the other consumers segment. This means that market concentration remains particularly high in the household segment.

Provision of transmission and distribution services to gaseous fuel suppliers

Distribution services are provided to gaseous fuel suppliers under distribution service agreements concluded between the gas DSOs and suppliers. In the event that the distribution system operator and the gaseous fuel supplier conduct their activities within the same energy enterprise, the conclusion of such an agreement is not required, as the enterprise provides the distribution service for its own benefit.

Taking into account both models described above, in 2025, gas DSOs reported 272 cases of providing the possibility to deliver distribution services, both on the basis of concluded distribution service agreements and in the event that distribution and sales activities were conducted by the same energy enterprise. If a supplier conducted activities within the area of more than one gas DSO, it could be indicated multiple times.

The average number of suppliers to which a single operator provided or could provide distribution services was 5.8, with half of the operators ensuring such a possibility to no more than three suppliers.

At the same time:

- in the area of 16 gas DSOs, a single supplier conducted activities,
- in the areas of 10 gas DSOs, at least 10 suppliers operated,
- only in the case of 2 gas DSOs, the number of suppliers exceeded 20.

The above indicates a diversified level of competition at the local level, despite formal access to the network infrastructure.

In 2025, 58 final customers were connected to the natural gas transmission network, to which sales were conducted by 14 trading companies holding a licence for trade in gaseous fuels.

Retail market size

In 2025, sales of natural gas delivered via the gas network to final customers amounted to 205,797,477 MWh, representing an increase of 6.93% compared to 2024.

Table 32. Sales of gas to final customers in the years 2024–2025 [MWh]

Market segments	2024	2025	Change in %
Households	54 604 159	57 697 170	5.66%
Other customers	137 863 964	148 100 307	7.43%
Entire market	192 468 123	205 797 477	6.93%

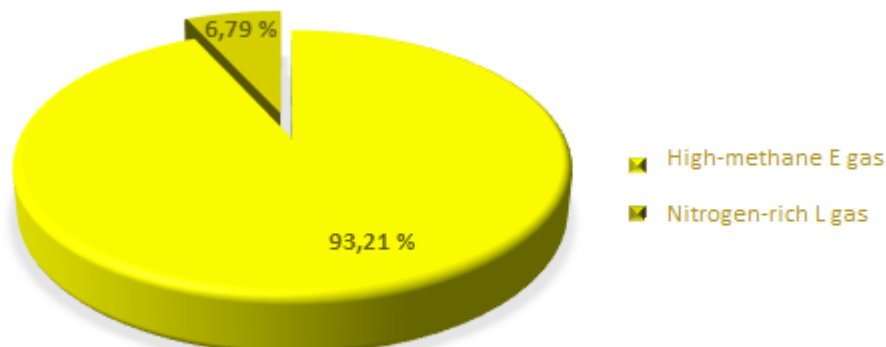
Source: URE on the basis of survey data.

¹⁶⁹ Active supplier – a gaseous fuel trading enterprise executing sales of gaseous fuels to final customers via the gas network during the reporting year.

An increase in sales volume was recorded both in the household segment and in the other consumers segment.

In the case of households, sales increased by 5.66%, while in the other consumers segment – by 7.43%, indicating relatively greater consumption dynamics in sectors other than households.

Figure 26. Gas sales structure by gas type – by volume



Source: URE on the basis of survey data.

In 2025, the vast majority of gaseous fuel sales consisted of E gas, the share of which amounted to 93.21% of the total sales volume.

The share of L gas was significantly lower and amounted to 6.79%, which results from the geographically limited scope of its occurrence and its gradual replacement with E gas.

Gas sales structure by offer type

The rules for applying tariffs in gaseous fuel trade result from the provisions of the Energy Law Act. As a general rule, gaseous fuel prices are formed under market conditions; however, with respect to specific consumer groups, the legislator has provided for a temporary retention of the obligation to apply tariffs approved by the President of URE¹⁷⁰.

Pursuant to Article 62b of the Energy Law Act, energy enterprises conducting business activities in the field of sales of gaseous fuel are obliged to apply tariffs approved by the President of URE with respect to the sale of gaseous fuels to household consumers and certain other categories of consumers specified in this provision. This regulation is of a transitional nature and was originally intended to be in force until 31 December 2023. In 2022, in the face of international tensions having a direct impact on energy product markets, the period for applying tariffs approved by the President of URE was extended until 31 December 2027.

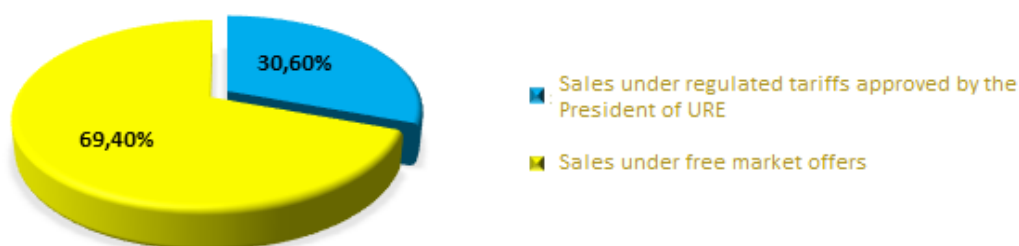
With respect to the other final customers, the sale of gaseous fuels takes place under market conditions, based on commercial offers of trading companies.

The gas sales structure by offer type has been presented from two perspectives:

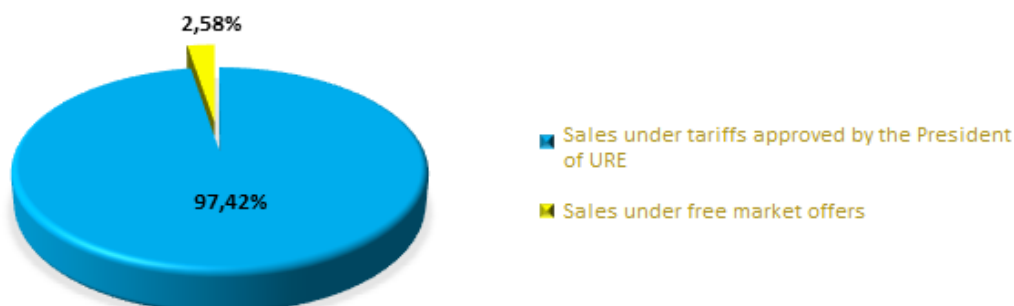
- by sales volume expressed in MWh,
- by the number of GCPs.

Such an approach enables a simultaneous assessment of the importance of individual market segments from the perspective of gaseous fuel consumption and the number of customers utilising particular forms of sale.

¹⁷⁰ Article 62b para. 1 item 2 of the Energy Law Act.

Figure 27. Gas sales structure by offer type – by volume

Source: URE on the basis of survey data.

Figure 28. Gas sales structure by offer type – by GCP

Source: URE on the basis of survey data.

The analysis of the sales structure by volume and by the number of GCPs indicates significant diversification between market segments.

In volume terms, sales under free-market offers constituted the majority of the market at 69.40%, meaning that the largest gas consumption is attributed to consumers utilising market conditions.

At the same time, in terms of the number of GCPs, tariff-based sales remain the dominant form of sale, covering 97.42% of GCPs, which results from the fact that the vast majority of household consumers are covered by the tariff mechanism.

This means that the retail market for gaseous fuels is characterised by the dominance of tariff-based sales in terms of the number of consumers, combined with the simultaneous dominance of free-market sales in terms of consumption volume.

This structure reflects the specificity of the market, in which households constitute the majority of consumers, whereas the essential part of gaseous fuel consumption is concentrated among other consumers.

Gas sales structure by customers sectors

The analysis of the retail market is supplemented by the gaseous fuel sales structure by final customer sectors¹⁷¹, which allows for the identification of the main areas of gas utilisation in the economy.

¹⁷¹ The following definitions of sectors have been adopted:

- Households – final customers purchasing gaseous fuels solely for their own consumption within the household;
- Power and heat generation – customers utilising gas for the generation of electricity and/or heat, including combined heat and power (CHP) plants and cogeneration facilities, regardless of the scale of activity;
- Energy-intensive industry – large industrial plants with high gas consumption, in particular from industries such as the chemical industry, metallurgy, and the production of construction materials (e.g. cement plants);
- Light and medium industry – production plants with moderate gas consumption, including, among others, food processing, furniture manufacturing, wood industry, textiles, and similar activities;

The data have been compiled on the basis of information provided by trading companies and are presented in volumetric terms (MWh), with a distinction between E gas and L gas.

Table 33. Gas sales structure by customers sectors in 2025 [MWh]

Sector	E gaz	L gas	Total	Share in total sales [%]
Households	54 764 798.67	2 932 371.58	57 697 170.25	28.04
Power and heat generation	38 354 355.36	6 931 046.60	45 285 401.96	22.00
Energy intensive industry	59 267 638.51	2 083 980.09	61 351 618.60	29.81
Light and medium industry	21 846 535.66	1 129 841.58	22 976 377.24	11.16
Commercial services	11 065 042.99	424 947.88	11 489 990.86	5.58
Public utilities	6 104 111.52	382 087.27	6 486 198.79	3.15
Agriculture	422 448.52	88 270.95	510 719.47	0.25
TOTAL	191 824 931.23	13 972 545.94	205 797 477.17	100.00

Source: URE on the basis of survey data.

The gas sales structure indicates the dominant role of industrial customers and the power and heat generation sector.

The largest share in gas consumption was recorded in the energy-intensive industry sector (29.81%), which confirms the significant importance of gas as a technological fuel in industrial processes. A substantial share was also held by the power and heat generation sector (22.00%), in which gas is utilised for both electricity and heat generation, including in cogeneration facilities.

Households accounted for 28.04% of the total gas sales volume, which, given their dominant share in the number of consumers, indicates a relatively lower unit consumption.

The remaining sectors had a clearly smaller share in the structure of gas consumption. This structure indicates that gas consumption in Poland is primarily concentrated in sectors with high energy demand and in industrial activities, while the service sectors and agriculture play a relatively small role in the total sales volume.

In addition, E gas remains the dominant fuel in all sectors, whereas the share of L gas is of a supplementary nature and results from the regional scope of its occurrence.

Concentration of the gaseous fuel sales market

The analysis of the retail market is supplemented by the assessment of its concentration level, conducted using the Herfindahl-Hirschman Index (HHI), calculated on the basis of the suppliers' market shares.

The following methods were adopted to determine the HHI for individual customer groups:

- for households – based on the number of GCPs,
- for other customers – based on the volume of gaseous fuel sales (MWh).

-
- Commercial services – entities conducting service activities, in particular trade, food service, hotels, offices, shopping centres, and other service facilities;
 - Agriculture – agricultural and horticultural holdings utilising gas for technological purposes, including, among others, heating greenhouses, drying facilities, or livestock buildings;
 - Public utilities – entities performing public tasks, in particular healthcare facilities, education, public administration, and municipal economy units (e.g. wastewater treatment plants, waterworks).

Table 34. Market concentration index (HHI) in 2025.

Customers	HHI
Customers in households	9 532.27
Remaining customers	3 331.48

Source: URE on the basis of survey data.

The values obtained indicate a very high market concentration level in the household segment, measured based on the number of GCPs, and a moderately high concentration level in the remaining customers segment, determined based on the sales volume.

The diversification of the concentration level results from the different structures of both market segments and the basis of measurement adopted. In the household segment, sales remain heavily concentrated around a single dominant supplier, which is directly reflected in the structure of the number of GCPs. Conversely, in the other consumers segment, concentration is lower, and the market structure is characterised by a greater dispersion of shares among suppliers.

To further enhance the market concentration analysis, the structure of the number of suppliers by market share level, determined on the basis of the volume of gaseous fuel sales to final customers, was also analysed.

Number of suppliers by market shares:

- above 5% – 2 suppliers,
- from 1% to 5% – 4 suppliers,
- below 1% – 79 suppliers.

The market structure indicates that the number of suppliers holding a significant market share is limited, with the simultaneous presence of a large group of entities with very small shares.

This means that despite the formal presence of many market participants, gaseous fuel sales are concentrated within a limited number of the largest enterprises, which is reflected in the HHI values.

Alongside the sale of gaseous fuels delivered via the gas network, some trading companies also conduct sales of other gaseous fuels, including LNG.

LNG sales

LNG sales constitute an important segment of the retail market for gaseous fuels, carried out by a number of enterprises conducting business activities in the field of gaseous fuel trade.

For the purposes of this study, LNG sales to final customers are understood as deliveries of liquefied natural gas carried out directly to customers utilising the gaseous fuel for their own consumption, using regasification installations located at the customers' premises.

In 2025, 25 enterprises holding a licence for trade in gaseous fuels reported sales of LNG to final customers, provided that these sales did not include deliveries carried out at vehicle refuelling stations.

Table 35. LNG sales to final customers by sector in 2025

Sector	Number of customers	LNG [MWh]	Share of LNG sold [%]
Power and heat generation	21	336 726.85	12.18
Energy intensive industry	3	22 772.03	0.82
Light and medium industry	139	1 487 385.08	53.79
Commercial services	297	590 656.47	21.36
Public utilities	11	179 323.82	6.48
Agriculture	6	148 348.98	5.36
TOTAL	477	2 765 213.24	100.00

Source: URE on the basis of survey data.

The LNG sales structure indicates the dominant role of the light and medium industry sector, which accounted for 53.79% of the total LNG sales volume. A significant share was also recorded in the commercial services sector (21.36%) and in the power and heat generation sector (12.18%).

The remaining sectors, including public utilities and agriculture, were of relatively lesser importance in the LNG sales structure.

At the same time, the structure of the number of consumers indicates the dispersed nature of LNG utilisation – the largest number of consumers occurred in the commercial services sector and in the light and medium industry.

The sales of LNG complement the market for natural gas delivered via the gas network and play an important role in ensuring access to gaseous fuel in locations not covered by the network infrastructure or in cases where its development is economically unviable.

Other gaseous fuels

In addition to LNG, some trading companies also conduct sales of other gaseous fuels, in particular compressed natural gas (CNG), coke oven gas, and gas from mine demethanisation.

The sales of these fuels are conducted by a limited number of enterprises and remain a segment of marginal importance for the national gaseous fuel market. These fuels are mainly utilised in the industrial sector, whereas the sales of CNG are primarily carried out in the transport sector.

4.2.2.1. Monitoring the level of prices, the level of transparency, the level and effectiveness of market opening and competition

Tariffs for gaseous fuels

Tariffs established by energy companies for the sales of natural gas were subject to approval by the President of URE when gas was sold to consumers in households and to consumers performing important public utility tasks¹⁷² (hereinafter also referred to as “eligible consumers”).

In the tariff/tariff amendment approval proceedings, the President of URE is obliged in particular to examine whether the prices and fee rates set therein have been calculated in accordance with Article 45 of the Energy Law Act, that is, whether they ensure that only justified costs are covered, as well as whether they guarantee the protection of customers' interests against their unjustified level.

In 2025 the President of URE approved 41 tariffs or tariff amendments for enterprises operating in the field of trading in gaseous fuels (that is sales of gaseous fuels to consumers referred to in Article 62b para. 1 item 2 of the Energy Law Act).

After 31 December 2024, the provisions aimed at limiting gas price increases for eligible consumers through the introduction of maximum gaseous fuel prices ceased to apply¹⁷³. In view of the above, as of 1 September 2025, settlements between eligible consumers and gaseous fuel suppliers shall be based on the gaseous fuel trading tariffs approved by the President of URE, without any limit restricting the level of prices and rates for eligible customers. Nevertheless, the President of URE monitors price levels on the markets on an ongoing basis and takes the necessary measures. In October 2025, as part of the performance of their duties and pursuant to Article 47 para. 1 of the Energy Law Act, the President of URE called upon three energy enterprises to submit an application for a tariff amendment by reducing gaseous fuel prices. This call resulted from the situation on the gas market at that time (a significant drop in prices compared to the level planned in the applications for tariff approval). As a result of the aforementioned actions, three entities submitted applications for a tariff

¹⁷² Article 62b para. 1 item 2 of the Energy Law Act.

¹⁷³ Article 3 para. 1 item 2 of the Act of 15 December 2022.

amendment by reducing gaseous fuel prices, which in two cases led to a reduction in gas fees borne by eligible consumers in 2025. Conversely, the third proceeding was not completed in 2025.

From the point of view of eligible consumers, the PGNiG OD sp. z o.o. tariff¹⁷⁴ was of key importance, as it is used to settle more than 90% of consumers.

In 2025, the President of URE conducted one tariff proceeding for the aforementioned energy company. This proceeding concerned the approval of PGNiG OD sp. z o.o.'s Tariff No. 16 for the supply of gaseous fuels, which came into force on 1 July 2025. Gaseous fuel prices were reduced by approximately 14.8% (from 239.65 PLN/MWh to 204.26 PLN/MWh) compared with the prices set by the energy company in Tariff No. 15, approved on 27 June 2024. As part of the calculation of PGNiG OD sp. z o.o.'s Tariff No. 16 for the supply of gaseous fuels, the President of URE took into account the amount of the adjustment for the period from 1 January 2024 to 30 June 2024, resulting from insufficient recovery of gaseous fuel purchase costs following the expiry of PGNiG OD sp. z o.o.'s gaseous fuel trading Tariff No. 13¹⁷⁵.

The retail gas market operates on the principle of third-party access to the network, which enables final customers to choose their gas supplier.

Pursuant to Article 3 item 13a of the Energy Law Act, a final customer is defined as a customer that purchases fuels or energy for their own use.

From the perspective of the final customer, both the mechanisms enabling active participation in the market – in particular the ability to switch suppliers – and the measures ensuring the continuity of gas supplies and the protection of customers in exceptional circumstances are of significant importance.

Certain aspects of the functioning of the retail gas market from the perspective of the final customer are set out below, including the process of switching suppliers, the mechanisms for last resort supply and default supply, and instances where gas supplies are suspended.

Monitoring supplier switching

The right of the consumer to choose a gas supplier is set out in Article 4j of the Energy Law. This provision guarantees consumers the right to purchase gas from a supplier of their choice and sets out the basic rules governing the process of switching suppliers.

Supplier switching involves the consumer entering into a gas supply contract with a new supplier, whilst ensuring the continuity of gas distribution or transmission services provided by the relevant system operator.

Detailed procedures for switching electricity suppliers are set out in the gas TNC and DNCs, which are drawn up by transmission and distribution system operators in accordance with Article 9g of the Energy Law Act and approved by the President of URE. Gas DSOs also publish information on their websites regarding the procedure for switching electricity suppliers and the rules governing its implementation.

The process of switching suppliers is one of the fundamental mechanisms underpinning the functioning of the retail market, enabling consumers to participate actively in the market and choose the offer that best suits their needs.

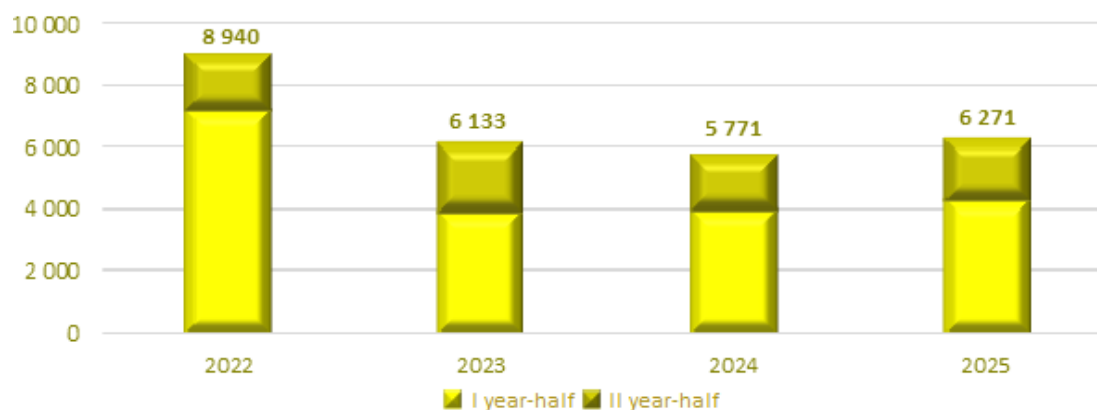
¹⁷⁴ Currently: myORLEN sp. z o.o.

¹⁷⁵ In connection with the decision of the President of URE of 17 April 2025, issued pursuant to Article 63b para. 6, in conjunction with Article 63b paras 1–5 of the Act of 15 December 2022.

Consumer activity regarding switching suppliers

In 2025, there were 6,271 switches of gas suppliers, based on the number of consumers, representing an increase of 8.66% compared with 2024.

Figure 29. Number of switches of suppliers by number of consumers in 2022–2025



Source: URE on the basis of survey data.

The switches of the supplier mainly concerned consumers in the 'other consumers' category that use high-methane gas.

Table 36. Supplier switches by consumer groups in 2025

Consumer groups	Households		Other consumers	
	High-methane gas	Nitrogenous gas	High-methane gas	Nitrogenous gas
Number of consumers	2 006	6	4 259	0
Number of GCPs	2 197	6	10 843	0

Source: URE on the basis of survey data.

The largest number of supplier switches occurred in the other consumers group for high-methane gas, with 4,259 consumers, which corresponded to 10,843 GCPs.

The ratio of the number of GCPs to the number of consumers indicates that within this customer group, some entities possess multiple GCPs, which is characteristic of institutional and industrial consumers.

Conversely, no supplier switches were recorded in the other consumers group on nitrogen-rich gas networks.

Switching rates

Despite the recorded increase in the number of supplier switches, the level of consumer activity in the market remains low. In 2025:

- for household consumers, the annual supplier switching rate amounted to:
 - 0.03% by the number of GCPs;
 - 0.06% by volume,
- for other consumers, this rate amounted to:
 - 3.27% by the number of GCPs;
 - 2.73% by volume.

Customers not switching supplier

An additional indicator of consumer activity is the share of consumers who have not switched their supplier within the last three years. In 2025:

- among household consumers, this share amounted to 99.63% (by GCPs),
- among other consumers, it was 94.16% (by GCPs).

Table 37. Consumers who have not switched supplier within the last three years

Consumer groups	Total number of consumers/GCPs	Of which no supplier switching			
		households		other consumers	
		E gas	L gas	E gas	L gas
Number of consumers	7 515 013	7 011 219	353 918	140 428	9 448
Number of GCPs	7 744 734	7 076 026	356 686	292 368	19 654

Source: URE on the basis of survey data.

These data confirm that the vast majority of final customers do not actively utilise the possibility of supplier switching.

The level of consumer activity in terms of supplier switching constitutes one of the fundamental indicators of competition development on the retail market for gaseous fuels.

The low scale of supplier switching, particularly in the household segment, may result from the ongoing high level of market concentration, as well as from other factors, including:

- the functioning of the tariff mechanism for household consumers, which limits economic incentives for supplier switching,
- relatively low consumer awareness regarding the possibility of supplier switching,
- the perceived complexity of the supplier switching process,
- the stability of contractual relationships between consumer and suppliers.

At the same time, the higher activity observed in the other consumers segment indicates a greater importance of economic factors and more active gaseous fuel purchase management by entities conducting business activities.

Last resort supply and default supply

The Energy Law Act provides for mechanisms aimed at ensuring the continuity of supply of gaseous fuel to final consumers in situations where the consumer does not hold an active contract for the sale of gaseous fuel or when the existing supplier has ceased conducting business activities in the field of gaseous fuel sales.

These mechanisms include, in particular, supply of last resort¹⁷⁶, and default supply of gaseous fuel¹⁷⁷. These mechanisms constitute an element of the customer protection system, ensure the continuity of gaseous fuel supply, and mitigate the risk of supply interruption in the event that the existing supplier ceases sales. In the case of consumers with respect to whom energy enterprises are

¹⁷⁶ Supply of last resort – pursuant to Article 3 para. 6b of the Energy Law Act, means the sale of gaseous fuels to a final customer connected to a gas distribution network or to a gas transmission network, conducted by a last resort gaseous fuel supplier in the event that the existing supplier ceases the sale of gaseous fuels, executed under a gaseous fuel sales contract or a comprehensive contract referred to in Article 5 para. 3.

¹⁷⁷ Default supply of gaseous fuel – pursuant to Article 5ab of the Energy Law Act, means the sale of gaseous fuels to a final customer in the event that the last resort supplier does not initiate sales or in the absence of a last resort supplier.

obliged to apply tariffs approved by the President of URE in their settlements, these tariffs apply to carrying out last resort supply and default supply¹⁷⁸.

Pursuant to the provisions of the Act, the consumer designates a supplier of last resort in the gaseous fuel sales contract. In the absence of such designation, deliveries are carried out by the default supplier appropriate for the operating area of the gas DSO. Distribution system operators and the transmission system operator are obliged to publish information on suppliers offering last resort supply.

In 2025, the transmission system operator and distribution system operators indicated that 24 trading companies for E gas and three companies for L gas acted as suppliers of last resort on their networks. On the other hand, 35 trading companies for E gas and six companies for L gas performed the function of a default supplier.

Among the entities performing the indicated functions, a significant role is played by ORLEN Group companies, which were designated by 8 operators as a supplier of last resort.

Based on the data provided by trading companies, in 2025, last resort supplies were executed for 174 consumers, corresponding to 198 GCPs. The volume of gas delivered under last resort supply amounted to 6,801.40 MWh

Table 38. Supply of last resort in 2025

Consumer groups	Households		Other consumers	
	E gas	L gas	E gas	L gas
Number of consumers	137	0	37	0
Number of GCPs	159	0	39	0
Volume of gas sold [MWh]	5 808.21	0	993.20	0

Source: URE on the basis of survey data.

In 2025, default supplies were executed for 464 final customers, corresponding to 640 GCPs. The volume of gas delivered under default sales amounted to 20,807.43 MWh.

Table 39. Default sales in 2025

Consumer groups	Households		Other consumers	
	E gas	L gas	E gas	L gas
Number of consumers	393	0	71	0
Number of GCPs	524	0	116	0
Volume of gas sold [MWh]	13 850.87	0	6 956.56	0

Source: URE on the basis of survey data.

Both supplies of last resort and default supplies were executed on a limited scale in 2025 and primarily concerned household consumers.

In the case of both last resort supplies and default supplies, no instances of their activation were recorded on the transmission network of the gas TSO in 2025. This may be due to the fact that large customers are connected to the transmission network, which are capable of professionally securing their gas supplies without utilising the mechanisms provided for in the Energy Law Act.

Furthermore, in the case of both last resort supplies and default supplies, no instances of their execution were recorded for L gas in 2025. This indicates the limited importance of these mechanisms in the L gas segment, which may result from the specificity of this market, in particular, a smaller

¹⁷⁸ Applies to the customers referred to in Article 62b of the Energy Law Act.

number of consumers and a limited number of suppliers operating in the distribution areas of this type of fuel.

Supply suspension

In 2025, according to data from gas DSOs, gas supplies were suspended for 40,598 E and L gas consumers, 90.76% of which were household consumers. Article 6b of the Energy Law Act specifies the circumstances in which an energy company may suspend the supply of gaseous fuels, and the conditions under which this measure may be applied. In accordance with this provision, an energy company may suspend the supply of gaseous fuels, in particular where a customer is in arrears with payment for the gaseous fuel supplied or the services provided.

Supplies may also be suspended in other cases provided for by law, in particular where the unauthorised withdrawal of gaseous fuel or the use of the installation in a manner posing a threat to life, health or the environment is established.

The detailed terms and conditions, as well as the procedure for suspending gas supplies, are also set out in the provisions of contracts concluded with customers and in the gas TNC and DNCs.

Table 40. Gas supply suspensions by consumer group in 2025

Consumer groups	Households		Other consumers	
	E gas	L gas	E gas	L gas
Number of consumers	35 063	1 784	3 710	41
Number of GCPs	37 033	1 902	10 323	43

Source: URE on the basis of survey data.

The most common reason for suspending gas supplies was the consumer's delay in paying for the gas supplied or the services provided. These cases accounted for 72.33% of all supply suspensions.

For household consumers, this share was higher, at 78.63%.

Table 41. Suspension of supplies due to non-payment in 2025

Consumer groups	Households		Other consumers	
	number	[%]	number	[%]
Number of consumers	28 971	78.63	392	10.45
Number of GCPs	30 861	79.26	441	4.25

Source: URE on the basis of survey data.

No suspensions of gas supplies were recorded on the transmission network in 2025.

4.2.2.2. Consumer protection and dispute settlement

Dispute resolution

Pursuant to Article 8 of the Energy Law Act, the President of URE resolves, upon a request of a party, disputes concerning, among others:

- refusal to conclude:
 - grid connection contracts, including those for increasing the connection capacity;
 - comprehensive contracts;
 - sales contracts;
 - contracts for the provision of gaseous fuel transmission or distribution services;

- contracts for the provision of natural gas liquefaction services,
- contracts for the provision of natural gas transport services;
- contracts for the provision of gas storage services;
- unjustified suspension of the supply of gaseous fuels.

An energy company has a public-law obligation to conclude contracts for connection to the gas network if the statutory conditions are met, that is if there are technical and economic conditions for connection and off-take, the entity requesting the conclusion of the contract meets the conditions for connection to the network and off-take, and has a legal title to use the real estate, facility or premises to which gaseous fuels or power are to be supplied. The consequence of the existence of a public-law obligation to connect to the grid, in the event of a dispute as to the existence of this obligation, is the shape of a connection contract with a fixed amount of the connection fee determined under Article 7 para. 8 of the Energy Law Act.

The number of applications for resolution of the above-mentioned disputes referred to in Article 8 para. 1 of the Energy Law Act that were received in 2025, compared to the previous period, decreased. In the reporting year, 282 such applications were considered. The most prevalent ones were applications for the resolution of a dispute over refusal to conclude a gas network connection contract. As in previous years, some of the disputes concerned the issue of suspension of supplies, mainly in connection with arrears in payments. The proceedings overwhelmingly confirmed the absence of a public law obligation on the part of DSOs to connect to the gas network. In most of these cases, the lack of obligation for the company to connect resulted from the lack of economic conditions allowing for connection. In some cases, an agreement was reached between the parties in the course of the proceedings as to the content of the grid connection contract, as a result of which the administrative proceedings were discontinued.

Other entities assisting consumers in resolving disputes with energy companies

Since May 2017, the Coordinator for Negotiations has been operating with the President of URE. The Coordinator's tasks include conducting proceedings on out-of-court resolution of disputes between consumers of gaseous fuels, electricity or heat in households and energy undertakings, aggregator or citizen energy communities or between renewable energy prosumers, virtual or collective prosumers of renewable energy, active customers that are consumers and energy undertakings, aggregator or citizen energy communities, arisen under the following contracts:

- on connection to the electricity, gas or heating network, including connection of micro-installations,
- for the provision of electricity or natural gas transmission or distribution services,
- for the provision of heat transmission and distribution services,
- sales contracts,
- comprehensive contracts,
- aggregation contracts,
- for the provision of electricity storage services.

In addition, there are Municipal and District Consumer Ombudsmen in Poland, to whom customers (consumers) can complain in individual cases, including the energy-related cases. The competences of Customer Ombudsmen comprise, among others, providing free of charge consumer advice and legal advice on the protection of consumer interests, bringing proceedings for the consumers and joining the ongoing proceedings on the protection of consumer interests upon the consumer consent.

Handling complaints

Complaints against energy companies submitted to the President of URE by household gas consumers are processed by the relevant organisational units within URE (depending on the subject of the complaint, this may involve both departments and regional offices). The range of issues raised by

consumers in 2025 was very broad, and the complaints were often multi-faceted. The President of URE took steps to clarify the matters covered by the complaints submitted, which concerned, among others, areas such as:

- connection to the grid: complaints reported by consumers in this category mainly concerned the performance of contracts for connection to the grid,
- metering: consumers reported problems with the operation of metering and billing systems, which directly affected billing and the amounts due on invoices,
- quality of supply: consumers have complained about the failure to meet the quality standards for gaseous fuel,
- unfair commercial practices: consumers reported incidents involving gaseous fuel sellers; these reports concerned misleading practices during the conclusion of contracts,
- contracts and sales: complaints reported by consumers in this category mainly concerned the performance of contracts, amendments to them, and issues relating to contract termination and the calculation of penalty charges. Consumers also reported irregularities relating to the contract conclusion process,
- commencement of supplies or resumption of supplies following an interruption: complaints received from consumers in this category mainly concerned the process of resuming supplies following an interruption and the fee for resuming supplies,
- suspension of supplies due to non-payment or late payment: in this category, consumers complained that companies had failed to follow the procedure for suspending supplies, in particular the failure to notify household consumers of their intention to suspend supplies,
- invoicing and debt recovery: complaints in this category related to the unclear content of invoices, the accuracy of settlements, the amounts quoted, the grounds for adjusting invoices, and the timeliness of their issuance,
- price / tariff: consumers have complained about being incorrectly allocated to a tariff group and have raised concerns about the level of prices and fee rates for gaseous fuels,
- compensation: consumers asked for help in obtaining discounts and compensation from energy companies,
- supplier switching: consumers complained about problems with the new contract coming into effect following supplier switching, and about the timeliness of settlements with the previous supplier,
- customer service: in this category, complaints most frequently concerned the timeliness of responses to complaints, delays in processing requests and instructions submitted by consumers, and difficulties in contacting the energy supplier by telephone (complaints made by telephone).

Table 42. Complaints against energy companies (suppliers and distribution system operators) lodged with the President of URE by household gas consumers

Complaint type	Number
Connection to the grid	99
Metering	34
Quality of supply	13
Unfair commercial practices	3
Contracts and sales	37
Commencement of supply or resumption of supply following an interruption	1
Suspension of supply due to non-payment or late payment	28
Invoicing and debt recovery	155
Price/tariff	119
Compensation	4
Supplier switching	5
Customer service	29
Other	18

Source: URE.

Protection of legitimate interests of consumers

In 2025, the President of URE maintained ongoing cooperation with the relevant administrative authorities and consumer protection bodies, in particular with municipal and district consumer ombudsmen, as well as with the President of UOKiK. This cooperation encompassed both the handling of individual consumer complaints and the ongoing exchange of information and consultations on issues relating to the functioning of the gas market and the protection of customers' interests.

A key element of this cooperation was the liaison with district and municipal consumer ombudsmen, who forwarded consumer complaints – particularly regarding gas supply bills – mainly to the Regional Branches of URE. These cases were analysed in the light of the powers of the President of URE, in particular pursuant to Article 28 of the Energy Law Act. Once clarifications had been obtained from the energy companies, the Office's position on the matter was communicated to consumers, often accompanied by information on the available avenues for further legal redress. The cooperation also included ongoing telephone consultations and the exchange of experiences on individual cases and on general issues, concerning, amongst other things, the rules for billing gaseous fuel consumers and tariffs approved by the President of URE.

In cases where complaints from consumers regarding the actions of energy companies involved in the distribution and sale of gas included requests for measures to be taken to protect consumers' interests, consumers were informed of the powers of the President of UOKiK to investigate business practices for compliance with competition and consumer protection legislation. Attention was also drawn to the possibility of referring the matter to the relevant department of that authority. At the same time, it was explained that disputes concerning the performance of contractual provisions between a consumer and an energy company are not subject to assessment under the administrative sanctions that may be imposed by the President of URE. It should also be noted that the number of such complaints was small.

In the case of reports concerning the technical condition of gas appliances/installations, it was pointed out that the district building control inspectorates were the competent authorities for dealing with such matters. As part of the proceedings conducted, in particular those concerning disputes examined under Article 8 para. 1 of the Energy Law Act, enquiries were also made to the relevant local authorities regarding the assumptions underlying the local authorities' gas supply plans or the plans for the supply of these utilities. Cooperation with local government bodies was a key element in gathering the information necessary for the proper examination of cases.

Providing access to consumption data

Pursuant to the provisions of the Energy Law Act, gaseous fuels suppliers are obliged to inform their customers about the amount of gaseous fuels consumed by these customers in the previous year and about the place where information about the average consumption of gaseous fuels for a given tariff group which these customers used is available, as well as about energy efficiency improvement measures and energy-efficient technical equipment.

In addition, an energy company making a settlement under gaseous fuels received or transmission services performed, provides a consumer, along with the billing relevant for the settlement type, with the following information:

- readings of the metering and billing system at the beginning and end of the settlement period, expressed in [m³] – for consumers consuming gaseous fuels in amounts not greater than 110 kWh/h,
- consumption of gaseous fuels in the settlement period, expressed in [m³],
- value of the conversion factor,
- consumption of gaseous fuels in the settlement period, expressed in [kWh],
- whether the indicated consumption is the actual consumption, forecasted consumption or consumption established in the event when it is not possible to read the indication of the metering

and billing system and the customer's failure to provide the reading of the metering and billing system – on the basis of average 24-hour consumption of gaseous fuel by the customer, established on the basis of correctly measured consumption of that fuel in a comparable period, multiplied by the number of days in the billing period,

- the amount of gaseous fuel remaining to be consumed or the amount that remains to be used from the previously paid fee – in the case of customers who have a prepaid metering and billing system installed,
- comparison of the consumption of gaseous fuels by a final customer, consuming gaseous fuels in the amount of no more than 110 [kWh/h], in the period which the settlement concerns, with the consumption of gaseous fuels in the corresponding period in the previous year,
- the price of gaseous fuels, the rates of transmission or distribution fees and the rate of subscription fee currently applied in settlements for the supply of gaseous fuels to a final customer,
- place of publication of analyses of the average consumption of gaseous fuels by consumers consuming gaseous fuels in amounts no greater than 110 [kWh/h], and information on energy efficiency improvement measures,
- tariff group.

In addition, the energy company provides the customer with the possibility of access to an electronic form of information on settlements and invoices issued to them.

Compliance programmes

In accordance with the Energy Law Act, the Compliance Programme sets out measures designed to ensure non-discriminatory treatment of system users, including the obligations of the operator's staff. The obligation to adopt a Compliance Programme is imposed on operators operating within the structures of a vertically integrated undertaking.

In 2025, two distribution system operators were required to adopt the Compliance Programme: PSG sp. z o.o. and Energomedia sp. z o.o., which changed its name to ORLEN Energomedia Operator sp. z o.o. on 31 December 2025.

Operators fulfilled their obligation to publish the Programmes on their websites. The reports on the implementation of the Compliance Programmes for 2025 were submitted by the statutory deadline – by the end of March 2026 – and published on the URE website¹⁷⁹.

An analysis of the content of the reports, particularly the report submitted by the compliance officer at PSG sp. z o.o., highlights the growing importance of the Programme and the role of the compliance officer.

One of the main objectives of the compliance officers' work was to monitor compliance with the principle of equal and non-discriminatory treatment of system users. The work of the compliance officers was largely based on issuing opinions and statements.

Operators also took steps to ensure the security and protection of sensitive information.

According to the reports, compliance officers monitor adherence to the Compliance Programmes on an ongoing basis. They were provided with the conditions to operate independently within the company and were able to liaise directly with the Management Board. The provisions of the Compliance Programme were implemented correctly in 2025. At both ORLEN Energomedia Operator sp. z o.o. and PSG sp. z o.o., no breaches of the principle of equal and non-discriminatory treatment of users were identified, nor were any conflicts of interest within the meaning of the Compliance Programme noted. Furthermore, no complaints regarding breaches of the provisions of the

¹⁷⁹ <https://bip.ure.gov.pl/bip/taryfy-i-inne-decyzje-b/inne-decyzje-informacj/4915,Inne-decyzje-informacje-sprawozdania-opublikowane-w-2026-r.html>

Compliance Programme were received by the compliance officers or the President of URE, nor were any reports of suspected conflicts of interest recorded.

4.3. SECURITY OF SUPPLIES

In 2025, the authority competent for matters related to the security of gaseous fuel supply was the Minister of Industry, performing also the role of the minister responsible for energy raw materials. The Minister also acted as the competent authority as defined in Regulation 2017/1938, that is, as the authority responsible for implementing the measures set out in the aforementioned Regulation to ensure the security of natural gas supply. However, on 21 August 2025, the Ministry of Industry was reorganised pursuant to the Regulation of the Council of Ministers of 18 August 2025 on the establishment of the Ministry of Energy. As a result of these changes, the matters in question remained within the remit of the Minister of Energy for the remainder of the year.

Pursuant to Article 49a para. 1 of the Act on Stocks, in the event of the occurrence of the conditions referred to in Article 11(1)(a) or (b) of Regulation 2017/1938, the minister responsible for the management of energy resources, upon receipt of information from the gas system operator or the operator of the interconnected gas system, declares, by way of a regulation, a state of crisis, referred to in Article 11(1)(a) or (b) of that Regulation, taking into account the expected inability to cover customers' demand for natural gas.

Pursuant to Article 49a para. 2 of the Act on Stocks, the state of emergency referred to in Article 11(1)(c) of Regulation 2017/1938 is announced by the minister responsible for the management of energy resources, by way of a regulation, after receiving information from the gas system operator or the interconnected gas system operator about the occurrence of at least one of the following situations:

- 1) threats to the gas security of the state,
- 2) disruptions in the supply of natural gas to the gas system,
- 3) sudden, unforeseen damage or destruction of devices, installations or networks, resulting in interruption in their use or loss of their properties threatening the safety of the gas system's operation,
- 4) unforeseen increase in natural gas consumption

taking into account the need to ensure uninterrupted supplies of natural gas to customers.

In the event of a state of emergency, the gas system operator takes the necessary measures to ensure or restore the proper functioning of the gas system¹⁸⁰. These measures include, in particular, the gas transmission system operator or the interconnected gas system operator requesting the minister responsible for energy resources management to approve the release of mandatory stocks of natural gas or submitting a request to the Council of Ministers to introduce restrictions on the consumption of natural gas¹⁸¹.

Taking into account the concept of gas security of the state, defined in Article 2 para. 1 item 1a of the Act on Stocks as a state enabling the current and prospective coverage of customers' demand for natural gas, in a specified amount and time, in a technically and economically justified manner, to the extent enabling the proper functioning of the economy, security of natural gas supply is the area of security in question which, under statutory regulations is also monitored by the President of URE.

The monitoring of the security of gaseous fuel supply carried out in 2025 was focused on those areas of market operation that referred in particular to issues related to:

¹⁸⁰ Article 51 para. 1 of the Act on Stocks.

¹⁸¹ Article 51 para. 1a of the Act on Stocks.

1) licences

Licences for foreign trade in natural gas are issued with consideration of diversification of natural gas supplies and energy security. An energy company dealing with foreign trade in natural gas is obliged to diversify natural gas supplies from abroad¹⁸². In addition, in 2025, licences for foreign trade in natural gas included a condition relating to the obligation to diversify natural gas supplies. As part of the procedure for granting licences for foreign trade in natural gas, the President of URE also verifies whether the applicant has submitted a declaration undertaking to comply with the diversification obligation.

2) diversification of natural gas supplies from abroad

In 2025, the President of URE undertook measures to verify compliance with the provisions of the Ordinance of the Council of Ministers of 24 April 2017 on the minimum level of diversification of natural gas supplies from abroad¹⁸³ by energy companies holding a licence to trade natural gas with foreign countries in 2023. The verification covered 39 entities.

3) tariffs

An indirect method of monitoring the security of gaseous fuels supply is tariffing of infrastructure companies. In the course of the tariff process, the extent of financing of assets (transmission, distribution, storage and liquefied natural gas installations), necessary for the supply of fuels to customers, is resolved. The amount of investment expenditures on network assets and the amounts allocated to repairs and modernisation of these assets determine their physical condition, that is operational security. The issue of tariff approval is further explained in Sections 4.1.1 and 4.2.2.1.

4) approval of plans to introduce restrictions on natural gas consumption by operators

The introduction of restrictions on natural gas consumption is intended to allow for the achievement of natural gas savings sufficient to ensure the state's gas security and to guarantee gas supplies to protected customers in the contracted quantities, despite the restrictions on natural gas consumption in force.

Gas transmission system operators, gas distribution system operators and gas interconnection system operators or energy enterprises acting as operators are obliged to develop a plan for introducing restrictions in the consumption of natural gas¹⁸⁴. Pursuant to Article 58 para. 17 of the Act on Stocks, the aforementioned operators update the plans for introducing restrictions annually and submit them, by 15 November of a given year, for approval by way of a decision.

The restriction plans developed by operators or energy companies acting as operators specify the maximum hourly and daily volumes of natural gas consumption by individual customers connected to their network, for individual supply levels. Pursuant to Article 58 para. 3 of the Act on Stocks and § 6 para. 6 of the Ordinance on Restrictions, the entities developing restriction plans inform customers of the maximum volumes of natural gas consumption in individual supply limitation levels established for them in the approved plan for introducing restrictions. These volumes, specified in the approved restriction plans, shall become an integral part of sales contracts, contracts for the provision of natural gas transmission or distribution services and comprehensive contracts, as defined in Article 5 para. 2 item 1 and 2 and para. 3 of the Energy Law Act.

In the fourth quarter of 2025, the President of URE received 49 applications for approval of plans to introduce restrictions on natural gas consumption, that is, from all entities required to do so.

¹⁸² Article 32 para. 2 of the Energy Law Act.

¹⁸³ Journal of Laws of 2017 item 902.

¹⁸⁴ Pursuant to Article 58 para. 1 of the Act on Stocks, hereinafter: restriction plan.

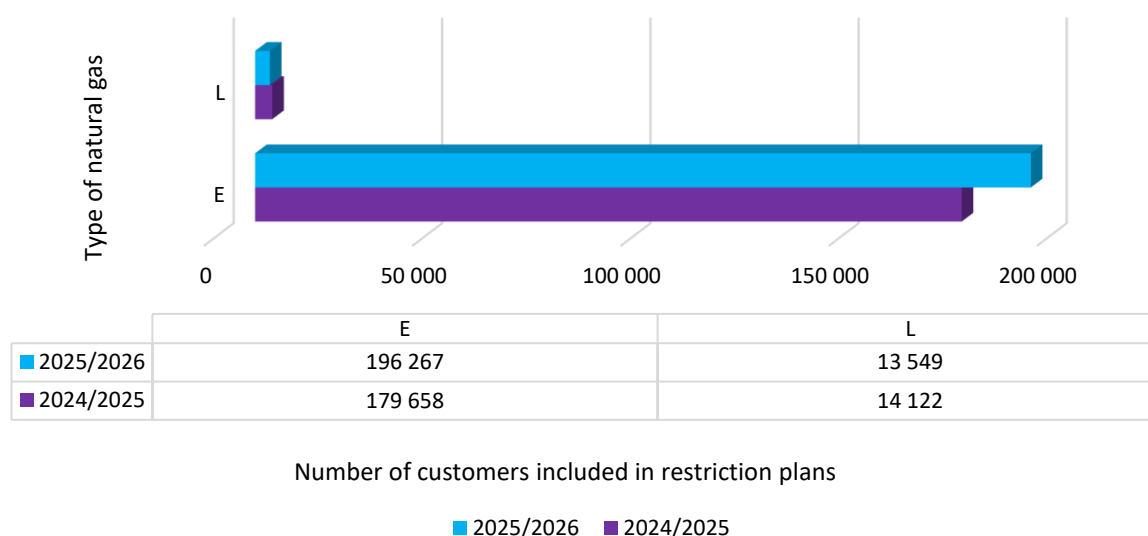
Compared to 2024, the number of entities obliged to submit a restriction plan on natural gas consumption increased by three.

The difference between the number of operators functioning in the country and the number of applications for approval of the plan for introducing restrictions on natural gas consumption is due to the fact that companies acting as operators of systems of gases other than natural gas (e.g. coke-oven gas) are not covered by the relevant obligation. The Act on Stocks applies to natural gas, while the Energy Law Act also to other types of gaseous fuels.

Plans for the introduction of restrictions on natural gas consumption were submitted for approval by the President of URE based on the applicable provisions of the Act on Stocks and the Restrictions Ordinance, as well as on the information dedicated to the aforementioned plans posted on the URE website, including a sample template for a restriction plan drawn up by the President of URE in order to streamline the process, both in terms of drawing up the plans and the process of approving them.

In 2025, the President of URE approved 31 plans to introduce restrictions on natural gas consumption for the 2025/2026 season. Proceedings concerning the remaining restriction plans continued in early 2026. The approved plans covered a total of 209,816 customers, which is approximately 8.3% more than in the restriction plans approved the previous year. This is due to new customers being connected to the network, as well as some customers losing their protected customer status (e.g. due to a change in the use of a particular facility connected to the gas network). At the same time, it should be noted that, compared with the plans approved for the 2024/2025 period, the number of nitrogenous gas (L) customers has fallen by nearly 600, which is mainly due to the conversion of the nitrogenous gas network to high-methane natural gas (E).

Figure 30. Number of customers for each type of natural gas included in the restriction plans approved for the 2024/2025 and 2025/2026 seasons

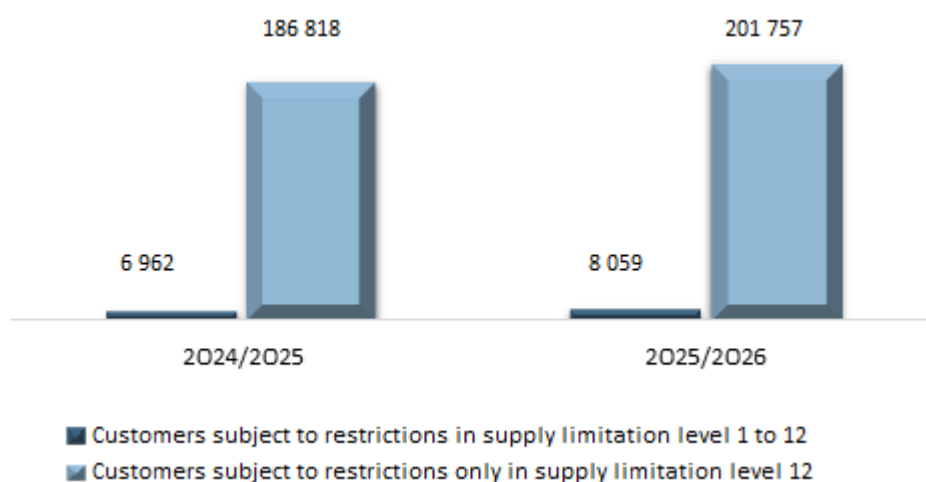


Source: URE on the basis of data from restriction plans.

The vast majority of customers (201,757; 96%) included in the currently approved plans are subject to restrictions only if the last – 12th supply limitation level – is introduced. The remaining customers (8,059) are subject to restrictions in supply limitation levels from 1 to 12, however, the full scope of restrictions with the obligation to reduce intermediate levels between 2 and 10 applies only to 788 largest natural gas customers. With reference to the above, in the case of customers other than protected customers, whose contractual capacity specified in the contract referred to in Article 5 para. 2 and para. 3 and 4 of the Energy Law Act is less than 5 500 kWh/h, pursuant to § 7 para. 10 of the Restrictions Ordinance, the volume of natural gas consumption specified in supply limitation levels 3 to 9 is equal to the volume of consumption in the second supply limitation level, that is the

average hourly and daily amount of natural gas consumed by the customer at a given exit point from the gas system in the period from 1 July of the preceding year to 30 June of the year in which the plan was developed, excluding days for which there was no daily off-take at the exit point from the gas system.

Figure 31. Number of customers included in restriction plans subject to restrictions in supply limitation levels 1 to 12, and only if supply limitation level 12 is introduced in 2024/2025 and 2025/2026 seasons



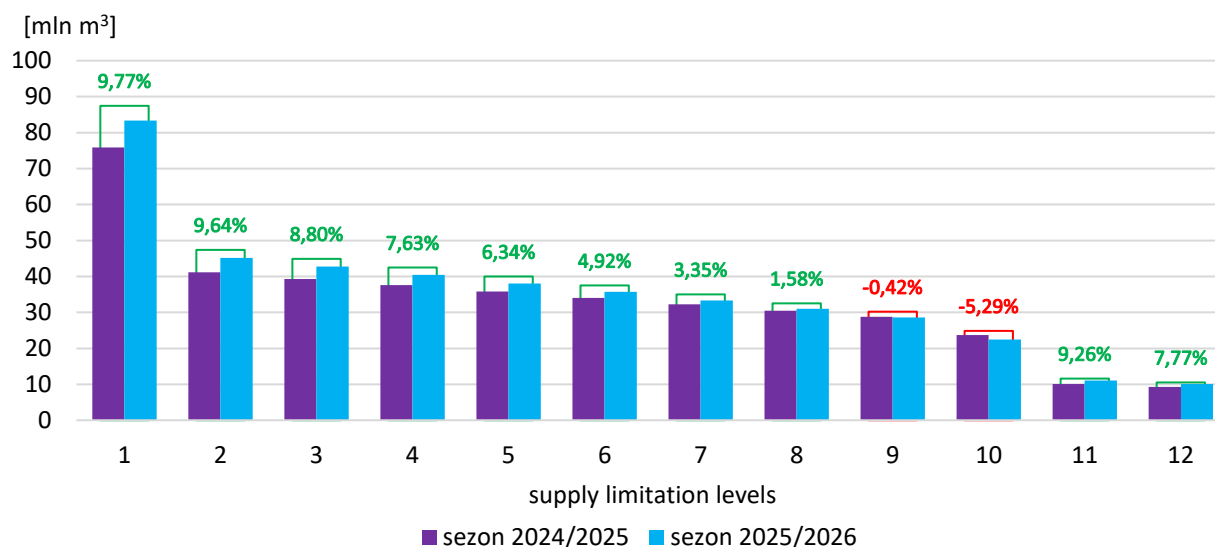
Source: URE on the basis of data from restriction plans.

The total maximum natural gas consumption volumes for customers included in the restriction plans approved in 2025 for the 2025/2026 season (for most of the supply limitation levels that could be implemented in the event of restrictions on natural gas consumption) have increased compared with the restriction plans approved for the 2024/2025 season. This increase is mainly due to an overall rise in the number of customers included in the restriction plans, as well as changes in contracted capacity and average natural gas consumption during the reference period by some of the existing customers included in the restriction plans. It should be noted that the average consumption corresponding to supply limitation level 2 in the plans approved for the 2025/2026 season accounts for approximately 54% of the contracted capacity, which corresponds to supply limitation level 1. This is the same ratio of the second to the first supply limitation level as in the restriction plans approved for the 2024/2025 season.

The levels and fluctuations of individual supply limitation levels in different seasons are primarily influenced by the number of new customers and the consumption history of existing customers during the reference period taken into account by gas system operators when drawing up the restriction plan. In this context, it is important to note that the reference period taken into account when determining a customer's average consumption (supply limitation level 2) is shorter (1 year) than the reference period taken into account when determining supply limitation level 10 (3 years), that is, the minimum hourly and daily volume of natural gas consumed by a customer at a given exit point from the gas system, which does not pose a threat to personal safety or cause damage to or destruction of technical facilities. At the same time, in order to prevent customers from attempting to inflate the 10th supply limitation level, the legislator has specified the provisions governing its determination¹⁸⁵.

¹⁸⁵ This quantity, as specified by the customer, must not exceed the highest of the minimum hourly and daily natural gas consumption levels set for each year during the three-year period preceding 1 July of the year in which the plan was drawn up, excluding days on which the hourly and daily volume of natural gas consumed by the customer at a given exit point from the gas system did not exceed 15% the value specified for that customer in the second supply level, as determined for the year in question.

Figure 32. Total maximum daily consumption volumes of E natural gas in [million m³/day] in the 2024/2025 and 2025/2026 seasons by customers other than protected customers, subject to restrictions in supply limitation levels 1 to 12



Source: URE on the basis of data from restrictions plans.

In 2025, no restrictions were imposed on the consumption of natural gas within the country or in any part of it. The procedure set out in the relevant legislation was last applied in 2009.

5) agreeing on draft development plans for gas companies

Agreeing with the President of URE on the draft network development plan allows companies dealing with transmission or distribution of gaseous fuels to secure adequate financial resources for the planned investment tasks, including tasks related to maintaining an appropriate level of reliability and quality of the network services provided, which have a direct impact on the security of gas supply. Monitoring of the implementation of tasks resulting from development plans in 2025 highlighted further progress in efforts to diversify sources and directions of natural gas supply, that is activities contributing to market liberalisation and directly enhancing the level of security of natural gas supply to Poland. In this context, a number of investment projects being carried out within the national transmission system are of particular importance, as they enable the distribution of natural gas within a changing supply landscape¹⁸⁶.

6) maintaining mandatory stocks of natural gas

Mandatory stocks of natural gas are maintained in the period from 1 October of a given year to 30 September of the following year. Thus, when describing issues related to the maintenance of mandatory stocks of natural gas in 2025, two sub-periods may be distinguished: from the beginning of the year until 30 September and from 1 October until the end of the year.

Two categories of entities (hereinafter jointly referred to as “obligated entities”) are required to maintain mandatory stocks of natural gas (hereinafter referred to as “gas stock obligation”):

- a) energy companies engaged in the business of trading natural gas with foreign countries, and
- b) importers of natural gas.

The first category currently includes companies holding a licence to trade natural gas with foreign countries. The second category generally comprises entities that import natural gas into the territory of the Republic of Poland as an intra-Community acquisition or imports for purposes other than trading

¹⁸⁶ The change to the power supply arrangement is linked to the expansion of import capacity at the FSRU terminal in the Gulf of Gdańsk and the terminal in Świnoujście, which has not been agreed with the President of URE.

in that gas. For example, entities importing natural gas are customers importing natural gas for their own use, including companies engaged in the transmission or distribution of natural gas, importing gas for purposes related to their own network activity.

In 2025 the Act on Stocks provided for the implementation of the gas stock obligation in three different formulas:

- 1) under a storage contract with a domestic gas SSO,
- 2) under a storage contract with foreign gas SSO,
- 3) under what is known as a stock ticket contract¹⁸⁷ with an energy company engaged in natural gas foreign trading or gaseous fuel trading (contractor).

In 2025, for both periods of the mandatory gas stock obligation – that is, up to 30 September 2025 and from 1 October 2025 – the number of entities required to fulfil the gas stock obligation increased compared with 2024, whilst the total volume of mandatory stocks held also rose.

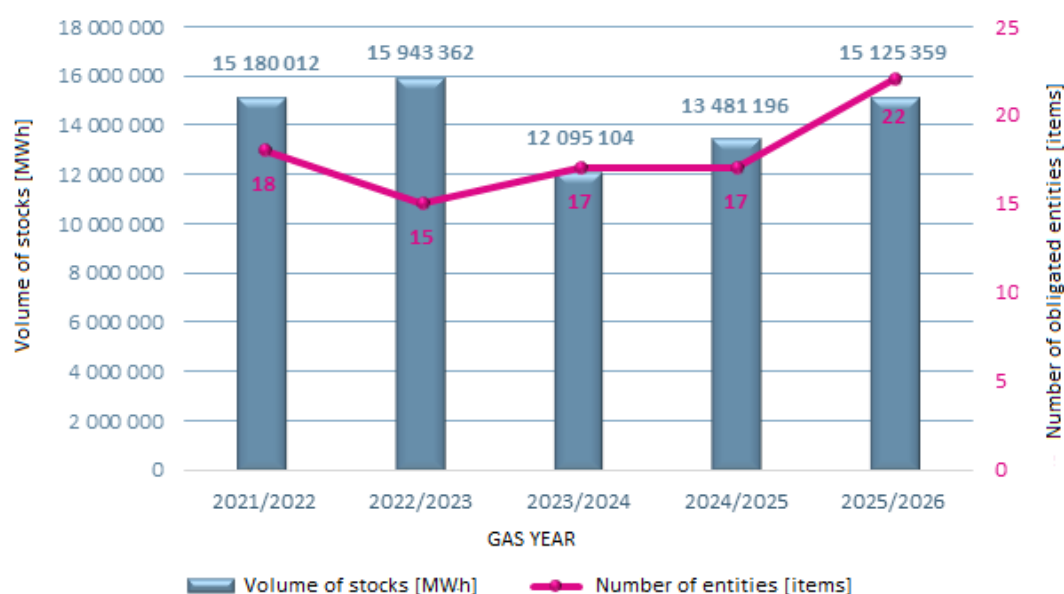
The tasks of the President of URE under the Act on Stocks related to, among others, establishing or verifying the volume of mandatory stocks, granting or refusing consent to conclude a stock ticket contract, controlling obligated entities with regard to the correctness of fulfilment of the gas stock obligation, sanctioning irregularities. Monitoring of the fulfilment of the obligation to maintain mandatory stocks of natural gas therefore covers both activities preceding the commencement of the obligation execution and its fulfilment.

The President of URE verified and determined the mandatory stocks of natural gas for the period from 1 October 2025 in the total amount of 15,125,359 MWh, which means an increase by 12% in the approved volume of mandatory stocks compared to the volume of stocks approved for the previous annual period. The number of entities required to maintain stocks from 1 October 2025 has risen from 17 to 22, representing a 29% increase compared with the previous gas year. This is due to a greater number of entities commencing operations involving the import of natural gas into Poland, as well as an increase in the volume of gas imports from abroad by entities already operating on the market.

In 2025, mandatory stocks were not released.

The scope of the gas stock obligation, that is the total amount of mandatory stocks determined for obliged entities in 2020-2025, is presented in the chart below.

¹⁸⁷ A stock ticket contract consists in allowing obligated entities to outsource the obligation to create and maintain mandatory stocks to another energy company. It is possible to create stocks on gaseous fuel belonging to both the principal and the contractor. The stocks so created can be held both domestically and internationally.

Figure 33. Volume of approved mandatory stocks of natural gas

Source: URE's own analysis.

7) Stock ticket contracts

The year 2025 was the ninth year in which obligated entities had the possibility to fulfil their gas stock obligation by concluding the so-called "stock ticket contract" referred to in Article 24b of the Act on Stocks. An energy company carrying out economic activity in the field of foreign trade in natural gas and an entity importing natural gas may commission, under a contract, the performance of tasks related to the maintenance of mandatory stocks of natural gas to another energy company carrying out economic activity in the field of foreign trade in natural gas or to an energy company carrying out economic activity in the field of trade in gaseous fuels. The basic requirements for the content of such a contract are contained in Article 24b para. 3 of the Act on Stocks. In addition, the Act indicates that in the event that the mandatory stocks of natural gas, maintained in accordance with Article 24b para. 1, do not constitute the property of the energy company carrying out economic activity in the field of foreign trade in natural gas or of the natural gas importer commissioning the maintenance of these stocks, the contract should also contain provisions guaranteeing the commissioning party the right to purchase these stocks within its duration and specifying the method of determining the resale price of these stocks.

Before concluding a stock ticket contract, an energy company performing economic activity in the field of foreign trade in natural gas and an entity importing natural gas (as entities obligated to fulfil the gas stock obligation) shall be obliged to submit a draft of the contract to the President of URE and obtain consent for its conclusion. The President of URE, by way of a decision, shall either consent or refuse to consent to the conclusion of the contract, within 30 days from the date of receipt of a complete application for consent to the conclusion of the contract. The President of URE shall refuse to consent to the conclusion of a stock ticket contract if:

- 1) a draft of this contract does not contain the provisions referred to in Article 24b para. 3 of the Act on Stocks,
- 2) the location or technical parameters of the storage facilities and the gas networks to which these facilities are connected do not ensure the possibility of supplying the total quantity of mandatory natural gas stocks to the gas system within a period of no more than 40 days.

The President of URE's consideration of applications for authorisation to enter into a stock ticket contract in 2025 was significantly influenced by uncertainty regarding the final form of the regulations setting out how obligations relating to the maintenance of mandatory stocks would be fulfilled after

30 September 2025. The late decision on how the gas stock obligation would be fulfilled for the period from 1 October 2025 to 30 September 2026 affected the way in which applications were submitted to the President of URE for authorisation to enter into stock ticket contracts. In 2025, a greater number of applications than in previous years (due to an increase in the number of entities commencing operations in the field of international gas trading) were received relatively late – applications were received in mid-September 2025 and concerned stock ticket contracts coming into force on 1 October 2025. Whilst 8 and 9 such applications were received in 2023 and 2024 respectively, in 2025 applicants submitted 17 applications.

In this context, it was particularly important to be well prepared for conducting proceedings, so as to take all necessary steps effectively within the framework of individual administrative proceedings.

Having considered the applications containing draft stock ticket contracts submitted by the relevant companies and entities, the President of URE issued decisions granting approval for the conclusion of seventeen stock ticket contracts (or annexes to existing stock ticket contracts) to the obligated entities. None of the applications submitted to the President of URE in 2025 for authorisation to conclude a stock ticket contract for the 2025/2026 season were rejected or left unconsidered within the required timeframe.

In the 2025/2026 season, 16 stock ticket contracts concerned the storage of stocks within the national territory. One stock ticket contract concerned the storage of stocks abroad.

8) reporting obligations related to the maintenance of mandatory stocks

The statutory tool for monitoring obligations relating to the maintenance of mandatory stocks of natural gas are the provisions of Article 27 para. 2 item 1 and item 2 of the Act on Stocks¹⁸⁸.

Pursuant to these provisions, obligated entities were required to submit information on the actual volume of mandatory stocks of natural gas maintained and the place of their storage as at 15 September 2025 – by 20 September 2025.

In 2025, all obligated entities submitted information to the President of URE on the actual volume of mandatory natural gas stocks and their storage locations, as at 15 September 2025.

In addition, obligated entities are required to submit by 15 May 2025 to the minister responsible for energy resources management and the President of URE information on:

- 1) actions taken with a view to ensure the state's fuel security with regard to foreign trade in natural gas or imports of natural gas in the period from 1 January to 31 December of the preceding year (here: from 1 January 2024 to 31 December 2024), and
- 2) fulfilment of the obligation to maintain mandatory stocks of natural gas.

The above-mentioned disclosure obligation is referred by the legislator to the concept of the state's gas security (understood as a condition allowing for the current and prospective coverage of the customers' demand for natural gas, in a specific amount and time, in the technically and economically viable manner, to the extent enabling the proper functioning of the economy – Article 2 para. 1 item 1 of the Act on Stocks) and therefore this obligation has a broader scope than only directly related to the imports of natural gas, foreign trade in natural gas or only the implementation of the obligation to maintain natural gas stocks.

In addition to the monitoring carried out pursuant to Article 27 para. 2 items 1 and 2 of the Act on Stocks, the President of URE obtained information on the maintenance of mandatory stocks using dedicated questionnaires sent to entities in respect of which a decision had been issued verifying or determining the levels of mandatory stocks¹⁸⁹.

¹⁸⁸ <https://www.ure.gov.pl/pl/paliwa-gazowe/zapasy-obowiazkowe-gazu-ziemne/11860,Zapasy-obowiazkowe-gazu-ziemnego.html>

¹⁸⁹ Article 25 para. 3 and 5 of the Act on Stocks.

This was applicable to the period beginning on 1 October 2025, information on the fulfilment of the gas stock obligation was obtained by the President of URE on the basis of a questionnaire sent to selected enterprises subject to the relevant obligation.

In the period in question – as in preceding years – compliance with the obligation to maintain mandatory stocks of natural gas was monitored using information from obligated entities, to the extent referred to above, as well as information provided by these entities in applications to the President of URE in other matters, or documents submitted in the performance of other obligations, e.g. providing information on the implementation of contracts for the purchase of natural gas from abroad pursuant to Article 49c of the Energy Law Act. The information also came from other entities, including the transmission system operator, distribution system operators and the storage system operator, other trading companies, as well as administrative bodies (e.g. customs authorities pursuant to Article 25 para. 11 of the Act on Stocks). In order to identify the entities obliged to fulfil the obligation in question (entities that declared importing natural gas in the aforementioned period), data from the resources of URE, the gas TSO and the Ministry of Finance were used.

The monitoring carried out in the manner described above showed that:

- 1) 22 entities that were obligated to establish mandatory stocks, including 21 energy companies trading in natural gas with foreign countries and one natural gas importer, complied with their gas stock obligation ending 30 September 2025. In addition to using domestic storage facilities, mandatory stocks were also held in facilities located in Germany.
- 2) All 22 entities that were obligated to establish mandatory stocks, including 21 energy companies trading in natural gas with foreign countries and one natural gas importer, complied with their gas stock obligation as at 1 October 2025. In addition to using domestic storage facilities, mandatory stocks were also held in facilities located in Germany and Slovakia.