

Revision summary note

Amendments to TAP Network Code (TNC) implemented on 25 September 2025

1. Background

This is a note summarizing the contents and purpose of the amendments made to the TNC and is published according to Section 22.6 (b) of the TAP Network Code (TNC).

A public consultation on revisions to the TNC was held from 14 March until 14 April 2025.¹ Following the public consultation, which closed without any comments received, TAP submitted a request for ratification of its decision to adopt the TNC in the version submitted for public consultation, to the NRAs. The Italian, Greek and Albanian NRAs issued ratification decisions of the amendments to the TNC and the TAP Tariff Code in July 2025.²

The revised TNC is published on 25 September 2025.

2. Overview of revisions to the TNC

The revisions to the TNC are outlined below.

2.1 Changes to accommodate Nea Mesimvria as firm bidirectional

TAP currently has one physical entry and three exit points. In the coming years, Nea Mesimvria is expected to become a physically bidirectional IP. The capacity allocation published for the first binding phase of the 2021 Market Test therefore also includes firm capacity to TAP at Nea Mesimvria. (Under the same process, Roskovec is expected to become a new exit point. This is expected to be included in Table A of Appendix 2 in the near future, and potentially additional changes to be included in the TNC through a future revision.) The changes in this section become effective on the “NM Bidirectionality Date”, which is the date that Nea Mesimvria has become operationally bidirectional as published on TAP’s website, or at the latest on 1 October 2026.

2.1.1 Amendments concerning the products offered at a physically bidirectional Interconnection Point.

Nea Mesimvria will now be represented in Table A of Appendix 2 both as an Entry Point and as an Exit Point for Forward Capacity in the Forward IP Direction.

Currently, TAP is offering interruptible reverse flow products including Commercial Reverse Route 3 (Nea Mesimvria to Komotini) as well as Day-Ahead virtual entry capacity (which is often used in combination with firm exit capacity in Melendugno). Once TAP and DESFA are able to offer bundled firm capacity for both entry and exit TAP, interruptible capacity may (as per regulation) only be offered after firm capacity is sold out. TAP can therefore not continue offering the current interruptible reverse flow products mentioned above.

On this basis and given the provisions of Article 32 “Allocation of interruptible services” of the CAM NC (Capacity Allocation Network Code), the possibility to book Forward Interruptible Capacity in the Reverse IP Direction in Nea Mesimvria and the Commercial Reverse Route 3 (with Nea Mesimvria as an entry point) have been removed from the TNC. Komotini thus becomes the only Entry Point left for “Forward Interruptible Capacity that is provided in the Reverse IP Direction”.

These elements lead to revisions to the TNC definitions and in the sections 6.3 and 6.4.

¹ <https://www.tap-ag.com/transparency/public-consultations>

² ARERA's Resolution 317/2025/R/GAS of 8 July 2025, RAEWW's Decision no. E-164/2025 dated 03.07.2025 published in GR Government Gazette with no. B' 4549/20.08.2025 and ERE's Decision 145 of 08 July 2025.

2.1.2 Amendments concerning the Minimum Flow Rate for Nea Mesimvria

The Minimum Flow Rate is given separately both for Nea Mesimvria as an Entry Point and as an Exit Point, although the value is expected to be the same. Also in the definition, the reference is changed from Interconnection Point to “Entry Point or Exit Point in the Forward IP Direction”, and similar changes are made in a number of contexts (e.g. in 13.3 on FDA UIOLI or 13.6 on LT UIOLI) to avoid ambiguity.

A situation where Forward Firm bookings and nominations in opposing directions result in a netted flow being below the Minimum Flow Rate is now a possibility that TAP needs to be able to address. The current wording of Clause 9.5, (“If the aggregate of all Shippers’ Confirmed Quantities at a particular Interconnection Point would result in a physical daily flow greater than zero but below the relevant Minimum Flow Rate”) implies that TAP, in an IP with a single direction might (but is not expressly required to) bring the Confirmed Quantities down to zero. In a bidirectional point, a situation of a netted flow resulting in a flow below Minimum Flow Rate may be handled operationally through OBA and/or batch flow, therefore in most cases avoiding the need to bring the flows down to zero. However, should TAP have to do that, the TNC allows TAP to “revise the Confirmed Quantities” and bring the flow rate down to zero without necessarily setting the Confirmed Quantities to zero.

2.2 Changes to the fuel gas allocation

This section presents the revised fuel gas allocation methodology in the TNC. As fuel gas allocation is done on a monthly basis, these changes become effective only at the start of the first full month after the NM Bidirectionality Date, with the first Gas Day of such a month being termed the “Fuel Gas Update Effective Date”.

TAP is implementing a flow weighted distance approach for fuel gas allocation, which ensures that fuel gas costs are allocated to shippers based on all forward flows entering or exiting TAP. Note that with the allocation methodology applicable so far, Allocated Quantities for Interconnection Points other than Kipoi and Melendugno do not trigger any fuel gas charges to the relevant shippers.

The precise methodology has now been developed, and the formulas have been updated accordingly, in a way similar to the existing exit tariffs of the TAP Tariff Code but using Allocated Quantities instead of capacity and Fuel Gas quantities instead of Target Revenue. Distance weighting applies for both entry and for exit. The calculation is to be done for every shipper and every month, based on actual daily quantities.

Fuel Gas price calculations remain unchanged, while the formula for allocation of fuel gas quantities would be as follows, using the formula for allocation to entry points as an example:

Fuel Gas quantities allocated to quantities entering TAP for a given shipper (TNC, 14.4 e):

$$F_{S,En,t,x} = (50\% \cdot F_t) \cdot \left(\frac{AQ_{En,t,x} \cdot L_{rev,x}}{\sum_{j=1}^m (AQ_{En,t,j} \cdot L_{rev,j})} \right) \cdot \left(\frac{AQ_{S,En,t,x}}{AQ_{En,t,x}} \right)$$

where:

$F_{S,En,t,x}$	Fuel Gas quantities allocated to Shipper S for Gas Month t at Entry Point x , in kWh.
F_t	The aggregate Fuel Gas quantity for the specific Gas Month t , in kWh.
$AQ_{En,t,x}$	The aggregate Allocated Quantities for all Shippers for entry at Entry Point x during Gas Month t , in kWh.

$AQS_{S,En,t,x}$	The aggregate Allocated Quantities for Shipper S for entry at Entry Point x during Gas Month t , in kWh.
$L_{rev,x}$	Pipeline length from westernmost Exit Point to Entry Point x .
j	Denotes the unique serial number indicating the Entry Points for Forward Capacity within the TAP Transportation System. Entry Points are assigned unique serial numbers, 1 being assigned to the easternmost Entry Point and m to the westernmost one.
m	Total number of Entry Points for Forward Capacity in the TAP Transportation System.

A similar formula, but with distances calculated from the easternmost entry point instead of the westernmost exit point, applies to allocation to quantities exiting TAP.

The cap on fuel gas allocation is kept, but rather than being 2% per Fuel Gas Facility as today, it is now reformulated to apply as 2% for entry and exit respectively.

3. Other Changes to the TNC

3.1 Registration Portal

Seeking to further streamline and partly automate the process for registering new potential Shippers and to improve the user experience for registered parties, TAP has developed a registration portal. A number of amendments to the TNC are required to enable the use of this registration portal.

These changes include the introduction of a definition of the Registration Portal as well as replacing relevant references to the TAP website with the Registration Portal. Required modifications are introduced in Section 3.1 “Application to become a Registered Party” and in Appendix 3 “Registration Form”.

3.2 Changes aimed at increasing transparency and clarity concerning ETS

Based on Shipper feedback and internal considerations, TAP sees potential for providing more clarity and information to Shippers concerning emission charges. The changes are not triggered by the additional entry and exit points as indicated above, but given the relationship between fuel gas and ETS, this topic is addressed together with the changes to fuel gas described above.

Related revisions in the TNC include the following:

- The definition of Fuel Gas Price is amended to make the inclusion of emission charges explicit,
- Section 19.2 (d) Annual Statement is amended to also make explicit that emission charges are allocated only with the Annual Statement, while a statement is included that TAP may from time to time publish updates on input data to the Annual Statement. (TAP regularly receives requests from individual shippers for updates e.g. on ETS costs and redistributable revenues. Updates on these parameters have also been provided in the Stakeholder Forum taking place twice a year. Uploading such data also on the public EDP may be helpful and ensure equal access to information.)

3.3 Miscellaneous changes

Additional minor improvement updates not linked directly to any of the main themes include:

- “Initial Effective Date” being replaced by “date of this Network Code”, as the “Initial Effective Date” concept was mainly useful before start of operations and can be misleading in some contexts now.
- In section 13.1 on Surrender, the reference “in accordance with the procedures specified in Section 5.5” is deleted, as it is both erroneous and superfluous.

- In light of the foreseen electrification through a future TAP expansion project, a provision is introduced defining electrification as an explicit trigger for review of the fuel gas mechanism in section 14.5 and for electric power in section 15.7.