

# GAS REGULATION

## Poland



# Gas Regulation

Consulting editors

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Quick reference guide enabling side-by-side comparison of local insights, including into the domestic gas market, government policy and regulatory authorities; regulation of natural gas and unconventional gas production; regulation of natural gas pipeline transportation and storage, distribution, sales and trading; LNG regulation; mergers and competition, including price restrictions; international considerations, including foreign participation, treaties and other multinational agreements, and cross-border sales and deliveries; transactions between affiliates; and recent trends.

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Generated 02 March 2023

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## DOMESTIC SECTOR OVERVIEW

### State of the market

Describe the domestic natural gas sector, including the natural gas production, liquefied natural gas (LNG) storage, pipeline transportation, distribution, commodity sales and trading segments and retail sales and usage.

The liberalisation of the gas market in Poland is subject to the regulations of European directives, the main assumptions of which refer to the principles of unbundling, namely, the separation of the provision of network services (such as transmission, distribution and storage) from the production and sale of energy.

Gas transmission is the responsibility of the gas transmission operator GAZ-SYSTEM S.A. (GAZ-SYSTEM S.A.), which operates the most important gas pipelines in Poland and owns the liquid natural gas (LNG) terminal in Świnoujście. The distribution system operators (DSO) are private enterprise or enterprise with a state treasury share.

The functions of the storage system operator (SSO) are carried out by the special purpose enterprise Gas Storage Poland sp. z o.o., (GSP sp. z o.o.), which is owned by Polskie Górnictwo Naftowe i Gazownictwo S.A. (PGNiG S.A.). As of 2 November 2022, PGNiG S.A. became part of the PKN ORLEN Group.

Poland also produces natural gas. Natural gas is produced by PGNiG S.A., which is the dominant supplier of gas on the wholesale and retail markets. Wholesale trading of gaseous fuels is conducted primarily on the Energy Commodity Exchange S.A. (TGE S.A.), which is the only licensed commodity exchange in Poland operating under the Commodity Exchanges Act of 26 October 2000, which is authorised to operate a regulated market.

The total aggregate volume traded on all natural gas markets in 2021 was 180.8 TWh, an increase of 19.7 per cent compared to 2020. Trading on the commodity forward market also increased (by 21.4 per cent) to 152.1 TWh.

Trading in gaseous fuels is also carried out on the over-the-counter (OTC) market as part of direct transactions. As a result of the contracts concluded at the virtual point, 16.4 TWh of natural gas were delivered on the OTC market.

In 2021, energy companies sold 215.6 TWh of gas fuels to more than 7.4 million end-users. PGNiG Group remained the dominant entity in the sale of gas to end users in 2021, with a market share of 88.7 per cent.

*Law stated - 30 November 2022*

### Consumption

What percentage of the country's energy needs is met directly or indirectly with natural gas and LNG? What percentage of the country's natural gas needs is met through domestic production and imported production?

Domestic consumption of gaseous fuels has been rising steadily for several years, reaching 228.7 TWh at the end of 2021. According to a report by the Polish Geological Institute, Poland's current demand for natural gas is approximately over 20 bcm. In Poland, natural gas is used on a massive scale in the chemical industry, where it is necessary for the production of plastics, and in nitrogen plants for the production of fertilisers.

Domestic gas production in 2021 amounted to 43,003 GWh, representing 17.843 per cent of domestic consumption. Imports in total gas acquisition amounted to 158,906 GWh, which accounted for 80.23 per cent of the share in total acquisition. Approximately 56 per cent of all gas fuel supplies came from the eastern direction. Intra-community purchases of gas amounted to 39,164 GWh, which accounted for 19.77 per cent of the share in total purchases.

The sudden interruption of Gazprom's supply of gaseous fuels to Poland on 27 April 2022 led to an accelerated

diversification of supply sources. In the second quarter of 2022, deliveries of high-methane gas from outside the EU decreased by 91.5 per cent, while LNG terminal gas deliveries increased by 33.2 per cent compared to the second quarter of 2021. In contrast, gas deliveries from the EU increased by 171.5 per cent compared to the second quarter of 2021.

*Law stated - 30 November 2022*

## **Government policy**

**What is the government's policy for the domestic natural gas sector and which bodies set it?**

Energy policy in Poland is implemented by the executive authority, the Council of Ministers. The energy department of government administration, which covers the issues of energy raw materials, energy and fuels, is headed by the Minister of Climate and Environment. The main matters of the Minister include shaping the energy policy of the state and the European Union; the energy security of the country, including security of gas supply; initiating, coordinating and supervising international cooperation in the field of energy, energy raw materials and fuels; and participation in the work of European Union bodies.

On 2 February 2021, the Council of Ministers adopted the new Polish Energy Policy until 2040 – a strategic document, setting out the directions for the development of the energy sector, in particular, regarding energy transition. The main goals of the energy policy are the diversification of supply and the expansion of the natural gas network infrastructure to ensure security of supply.

*Law stated - 30 November 2022*

## **Regulatory authorities**

**Which authorities make regulatory policies and decisions in respect of the production, transmission, distribution and supply of natural gas?**

Functions concerning the regulation of fuel and energy management and the promotion of competition are carried out by the president of the Energy Regulatory Office (ERO), which is the central organ of government administration. The ERO president, as an independent body, is appointed by the Prime Minister from among those selected through an open and competitive recruitment process for a five-year term and can only be reappointed once. The ERO president regulates the activities of energy companies in accordance with the applicable legislation and the national energy policy, aiming to balance the interests of energy companies and fuel and energy consumers. Regulatory decisions are taken with reference to the production, transmission, distribution and supply of natural gas. The decisions of the ERO president are subject to appeal before the Regional Court in Warsaw – the Court of Competition and Consumer Protection.

*Law stated - 30 November 2022*

## **REGULATION OF NATURAL GAS PRODUCTION**

### **Ownership and organisation**

**What is the ownership and organisational structure for production of natural gas (other than LNG)? How does the government derive value from natural gas production?**

Currently, the exploration and production of natural gas on the Polish market is carried out by the company PGNiG S.A., whose majority shareholder is the state treasury (71.88 per cent as of 2021).

Part of the extracted nitrated gas is subject to further processing into high-methane gas. PGNIG S.A., which holds 47 licences for hydrocarbon exploration and prospecting and 188 licences for hydrocarbon production, remained the dominant entity in terms of the exploitation of natural gas deposits in 2021.

From 1 January 2016, the extraction tax has covered the extraction of natural gas. The tax is collected under the Act of 2 March 2012 on the tax on the extraction of certain minerals. The tax base for natural gas extraction is the value of the extracted natural gas, which is calculated by means of a special scheme that is regulated in the Act. Nitrated gas is subject to further processing into high-methane gas.

*Law stated - 30 November 2022*

### **Regulatory framework**

Describe the statutory and regulatory framework and any relevant authorisations applicable to natural gas exploration and production.

The terms and conditions for the extraction of hydrocarbons are specified in the Geological and Mining Act of 9 June 2011. The concession is the 'integrated concession', which includes the exploration, appraisal and extraction of hydrocarbons. The award of the concession takes place as a result of a tender procedure or at the request of an interested entity. The concession body is the Minister of Climate and Environment. In order to assess the ability of the entity to conduct the above-mentioned activities, a qualification procedure is carried out. The provisions of the Geological and Mining Act implement Directive (UE) 94/22 of 1994, which aims to ensure that EU member states have non-discriminatory access to conduct activities related to the exploration and production of hydrocarbons. A cooperation agreement is concluded with the entity selected in the tender, to which the Civil Code of 23 April 1964 applies to the extent not regulated in the Geological and Mining Act.

*Law stated - 30 November 2022*

### **Unconventional gas production**

Are there different rules for, or any restrictions on, unconventional natural gas production (including fracking)?

The fracturing process is subject to national and EU regulations, including the Recommendations of the European Commission 2014/70/EU on the basic principles for the exploration and extraction of hydrocarbons (including natural gas) using intensive hydraulic fracturing. An entity interested in the activity of exploration and extraction of raw material after obtaining a concession must at the same time carry out an environmental impact assessment of extraction and identify and eliminate the risk associated with environmental pollution. Companies are required to disclose the composition of the fracturing fluid they use in drilling, which is not a trade secret.

*Law stated - 30 November 2022*

### **Required security and guarantees**

Are participants required to provide security or any guarantees to be issued with a licence to explore for or to store gas?

If this is supported by a particularly important interest of the state or a particularly important public interest related to the protection of the environment or the economy of the country, a concession for the exploration and appraisal of hydrocarbons and the extraction of hydrocarbons or a concession for the extraction of hydrocarbons may be granted



provided that security is provided for claims that may arise as a result of the performance of the activities covered by the concession. The same concerns an enterprise performing such activities within the maritime areas of Poland. The security shall be established after the date of delivery of the decision approving the mining plant operation plan no later than before the date of commencement of the operation of the mining plant.

*Law stated - 30 November 2022*

## REGULATION OF NATURAL GAS PIPELINE TRANSPORTATION AND STORAGE

### Ownership and infrastructure

Describe in general the ownership of natural gas pipeline transportation, and storage infrastructure.

The Polish gas transmission system consists of (1) the National Gas Transmission System (KSP), and (2) the Transit Gas Pipeline System (SGT).

GAZ-SYSTEM S.A. has been appointed by the Energy Regulatory Office (ERO) president as the transmission system operator (TSO) in the mode of ownership unbundling (OU). There is only one TSO in Poland. This means that GAZ-SYSTEM is both the owner of the transmission infrastructure included in the domestic system and the operator of the transmission system.

GAZ-SYSTEM has also been appointed by the ERO president as the operator of SGT in the mode of Independent System Operator (ISO). SGT constitutes the Polish part of the Yamal-Europe pipeline. The ISO-mode means that GAZ-SYSTEM is not the owner of the transmission infrastructure and acts solely as its operator. SGT EuRoPol GAZ S.A. is the owner of the Polish section of the gas pipeline running from Russia through Belarus and Poland to Western Europe. The shareholders of SGT EuRoPol GAZ S.A. are:

- PGNiG S.A.;
- Gazprom; and
- Gas-Trading S.A.

Due to Russia's aggression against Ukraine in November 2022, based on the decision of the Minister of Development and Technology, a temporary receivership was established, as referred to in article 6(a) of the Anti-Aggression Act of 13 April 2022, against the enterprise Gazprom, which is one of the shareholders in the company SGT EuRoPol GAZ S.A. in order to ensure the security of critical infrastructure intended for the transmission of gas.

On the Polish energy market, underground gas storage (UGS) services are provided by Gas Storage Poland sp. z o.o., which is the sole storage system operator (SSO). The SSO is the operator of storage facilities operating on the basis of an entrustment agreement. In Poland, there are seven underground storage facilities of high-methane natural gas, cooperating with the gas transmission system:

- storage in depleted natural gas deposits: UGS Husów, UGS Wierzchowice, UGS Swarzów, UGS Brzeźnica and UGS Strachocina; and
- storage in salt caverns: KPMG Mogilno and KPMG Kosakowo.

The SSO gas storage facilities were 98 per cent full on 30 November 2022.

*Law stated - 30 November 2022*

## Regulatory framework

Describe the statutory and regulatory framework and any relevant authorisations applicable to the construction, ownership, operation and interconnection of natural gas transportation pipelines, and storage.

The construction of gas transmission pipelines is subject to the regulations of the Construction Law of 7 July 1994, the Energy Law of 10 April 1997 and the Regulation on technical conditions to be met by gas networks and their location. In addition, it is necessary to obtain a decision on environmental conditions. In order to carry out transmission activities, a concession must be obtained. The concession is granted by the ERO president after meeting the requirements of the Energy Law.

Only the TSO can be the owner of gas transmission pipelines, as, in principle, in Poland the model of the full unbundling of TSOs has been adopted. In Poland, one TSO has been designated, which operates in the form of a joint-stock company, whose only shareholder is the state treasury. The ISO model is limited only to a part of the Yamal–Europe gas pipeline and it is not possible to build gas transmission pipelines by an entity other than the designated TSO. Operation and rules for connection to the transmission system are regulated in the Energy Law, the Regulation on the detailed conditions for the operation of the gas system and the Transmission Network Code (IRiESP).

The construction of gas storage facilities is subject to the regulations of:

- the Construction Law
- the Geological and Mining Law; and
- the Energy Law.

An entity planning to build storage facilities must have a concession for the underground tankless storage of substances. In the case of the construction of cavern storage facilities – salt deposits, like other minerals, are covered by the mining property right, which is vested in the state treasury. In order to be able to use the object of mining ownership, it is necessary to establish mining usufruct in the form of an agreement with the concession authority. Mining usufruct may be preceded by a tender. The agreement on the establishment of mining usufruct becomes effective on the date of obtaining the concession.

The rules for connecting storage facilities to the transmission system are regulated in the Energy Law, the Regulation on the detailed conditions for the operation of the gas system and in the IRiESP.

The operation of storage facilities and the provision of storage services by the only OSM at present, Gas Storage Poland Sp z o.o., is set out in the Storage Service Provision Regulations (RŚUM) of 1 April 2022, which became effective from the start of the gas day on 15 April 2022.

In connection with changes to the Energy Law, proceedings are currently underway before the ERO president regarding the approval of the Storage Facilities Operation and Maintenance Manual (IRIESM) that will, in future, replace the RŚUM.

*Law stated - 30 November 2022*

## Land rights

How does a company obtain the land rights to construct a natural gas transportation or storage facility? Is the method for obtaining land rights to construct natural gas distribution network infrastructure broadly similar?

According to the regulations of the Civil Code, facilities for the supply or removal of gas do not belong to the components of real estate if they are part of an enterprise. The entity that incurred the cost of constructing the facilities may demand that the entrepreneur who connected the facilities to his or her network acquire ownership of them for appropriate consideration. The entrepreneur may also demand the transfer of ownership of these facilities. In order to upgrade existing gas networks or start a new project, one needs to obtain a title to the property, which is required by the Construction Law. One way to obtain title to real estate is to enter into an agreement establishing a transmission easement regulated by article 305(1) of the Civil Code, which indicates that the real estate in question may be encumbered for the benefit of an entrepreneur who intends to build or whose property is owned by facilities for the supply or discharge of gas with a transmission easement. It is possible to judicially establish a transmission easement in the absence of the real estate owner's consent to the contractual establishment of a transmission easement. It is possible for the transmission entrepreneur to apply the administrative procedure of article 124 of the Real Estate Management Act of 21 August 1997, as a result of which the district governor, by decision, restricts the use of the real estate for the foundation of equipment for the transmission or distribution of gases. In the case of upgrading transmission networks that have been sited on real estate for several decades, the most common way to obtain title to the property is to acquire a transmission easement in accordance with the provisions of the Civil Code. The above-mentioned methods of obtaining title to real estate apply *mutatis mutandis* to the gas distribution network. During the period of the establishment of the transmission easement strip, restrictions arise on the development of real estate with buildings and structures, including the planting of trees (controlled zones). The transmission easement expires, at the latest, with the completion of the liquidation of the enterprise that owns the transmission facilities.

*Law stated - 30 November 2022*

## Access

How is access to the natural gas transportation system and storage facilities arranged? How are tolls and tariffs established?

The TSO is obliged to provide services on a third-party administrator basis. The rules of access to the transmission network are described in the Energy Law and the IRiESP. The IRiESP includes the principles of balancing and the quality of gas entering the network. In order to obtain the status of the transmission service provider (ZUP), the gas seller is obliged to conclude a transmission agreement with the TSO.

The TSO sets a tariff for the transmission of gas, which is subject to approval by the ERO president, and proposes its duration. The TSO submits to the ERO president the tariff and its amendment on its own initiative no later than within two months before the expiry of the period of validity of the previous tariff or at the request of the ERO president. The tariff shall be calculated in such a way as to ensure covering the costs of justified economic activities of energy undertakings in the field of transmission by gas together with a reasonable return on the capital involved in these activities.

In the event of a documented change in the external conditions for the performance of the company's business activities, the ERO president may establish, *ex officio*, by way of a decision, correction coefficients resulting exclusively from the change in external conditions that the company is obliged to apply to the prices and fee rates set forth in the existing tariff until the new tariff comes into force. The tariffing of transmission services is also subject to the rules of Commission Regulation (EU) 2017/460 of 16 March 2017 establishing a network code on harmonised transmission tariff structures for gas.

The rules on access to gas storage are regulated in the Energy Law and the RŠUM. The SSO provides storage services to a storage customer (a ZUM) for the provision of gaseous fuel storage services in a storage facility on a non-discriminatory basis and on an equal basis to a ZUM, taking into account the optimal and efficient use of storage facilities. The storage contract is provided by the SSO on the basis of a storage services contract concluded by

application or by auction.

Similar tariff principles to those described above apply to SSOs, with the Energy Law stating that the coverage of the justified costs of the business activities of energy companies in the field of storage of gaseous fuels, including the construction, expansion and modernisation of gaseous fuel storage facilities, together with a reasonable return on the capital employed in these activities, should be set at no less than a rate of return of 6 per cent.

*Law stated - 30 November 2022*

### **Interconnection and expansion**

Can customers, other natural gas suppliers or an authority require a pipeline or storage facilities owner or operator to expand its facilities to accommodate new customers? If so, who bears the costs of interconnection or expansion?

An electricity enterprise engaged in the transmission or distribution of gaseous fuels is obliged to conclude a grid connection agreement with entities applying for grid connection on the basis of equal treatment. A connection is made if the technical and economic conditions for connection to the grid and supply of natural gas exist, and the applicant for conclusion of an agreement meets the conditions for connection to the grid and off-take. In disputes concerning the refusal to conclude a grid connection agreement, interested entities may apply to the ERO president for a ruling – his or her decision may be appealed to the Court of Competition and Consumer Protection.

The SSO shall apply a non-discriminatory and transparent procedure for the allocation of storage capacity, taking into account priority for obligated entities. Where there is storage capacity that can be made available, the SSO shall arrange to make it available. The SSO will decide whether this will be done by auction or by application and will immediately publish information on the IPI regarding a new auction or a new application procedure.

*Law stated - 30 November 2022*

### **Processing**

Describe any statutory and regulatory requirements applicable to the processing of natural gas to extract liquids and to prepare it for pipeline transportation.

The quality parameters of gaseous fuels are specified in article 38 of the Regulation on detailed conditions for the operation of the gas system of July 2010 and in the IRiESP. Gas injected into the network should meet the requirements set out in the aforementioned regulations. In the event that the quality parameters of gaseous fuels have not been met, the TSO or distribution service operator may refuse to accept such fuels, unless by providing an additional service (for a fee), it obtains the correct quality parameters for such fuels.

The gaseous fuel supplied by the customer for a ZUM for injection into the storage facility and the gaseous fuel dispensed to the ZUM from the storage facility must meet the requirements set out in the IRiESP.

*Law stated - 30 November 2022*

### **Contracts**

Describe the contractual regime for transportation and storage.

The customer has the option of concluding one comprehensive contract (both for sale and for gas production) with the seller of his or her choice or to conclude two separate contracts, one of which concerns the transmission and is

concluded with the operator, and the other concerning the purchase of gas from the selected seller.

In the case of split contracts, the customer is responsible for balancing him or herself. In the case of unbundled contracts, the customer itself is responsible for balancing. According to article 5(2)(2) of the Energy Law, the contract for the provision of gas fuel transmission services should at least contain provisions specifying:

- the contractual capacity and the conditions for its modification;
- the quantity of gaseous fuels or energy transmitted by contractual periods;
- the places of delivery of gaseous fuels or energy to the network and their withdrawal from the network;
- the quality standards;
- the conditions for ensuring the reliability and continuity of gaseous fuel or energy supply;
- the fee rates or tariff group used in settlements and the conditions for introducing changes to these rates and tariff group;
- the method of conducting settlements, technical parameters of gaseous fuels or energy and the amount of discount for failure to meet these parameters and quality standards of customer service;
- the responsibility of the parties for failure to meet the terms of the contract; and
- the term of the contract and the conditions for its termination.

By law, the IRIESP and the tariff are part of the contract for the provision of transmission services.

The SSO shall enter into a contract with a ZUM for the provision of gaseous fuel storage services. According to article 5(2)(3), the provisions of such a contract should specify:

- the contractual capacity and the conditions for introducing changes thereto;
- the quantity of gaseous fuels and the place, period and manner of their storage;
- the rate of charges or tariff group used in settlements and the conditions for introducing changes to that rate and tariff group;
- the manner of conducting settlements;
- the liability of the parties for failure to meet the terms of the contract; and
- the duration of the contract and the conditions for its termination.

The rules for the provision of storage services are governed by the Energy Act and the RŚUM.

*Law stated - 30 November 2022*

## REGULATION OF NATURAL GAS DISTRIBUTION

### Ownership

Describe in general the ownership of natural gas distribution networks.

A distribution system operator (DSO) may be a private company or with the state treasury share. The regulations do not introduce any restrictions other than the obligation to obtain a concession for the distribution of gas, which is granted by the ERO president after meeting the requirements of the Energy Law.

As of 31 December 2021, there were 55 DSOs operating in Poland. The largest DSO in Poland is Polska Spółka Gazownictwa sp. z o.o. (PSG sp. z o. o.), which manages, as of 2021, 95.6 per cent of the distribution networks in Poland, whose total length within the country, including connections, amounts to more than 208,900 km. In 2021, PSG sp. z o. o. supplied 144.2 TWh of gaseous fuels to customers, an increase of 14.5 per cent compared to 2020.

The other operators are:

- G.EN. GAZ Energia sp. z o.o.;
- DUON Dystrybucja S.A.;
- SIME Polska sp. z o.o.; and
- EWE Energia sp. z o.o.

*Law stated - 30 November 2022*

## **Regulatory framework**

Describe the statutory and regulatory structure and authorisations required to operate a distribution network. To what extent are gas distribution utilities subject to public service obligations?

The construction of distribution pipelines is subject to the Construction Law, the Energy Law, the Act on Investments in the Liquefied Natural Gas Regasification Terminal in Swinoujscie and the Ordinance on Technical Requirements for Gas Networks and their Location. In addition, it is necessary to issue a decision on environmental conditions. Competence for commissioning gas pipelines is held by the Office of Technical Inspection.

In order to perform distribution activities, a concession must be obtained, which is granted by the ERO president. An operator may remain a vertically integrated undertaking within the meaning of the Gas Directive 2009/73 as long as a given entity serves less than 100,000 customers connected to the distribution system included in that entity if the sales of gas by that entity during the year do not exceed 150 million m<sup>3</sup>.

The DSO has a public law obligation to connect customers, an obligation to provide services on a third-party administrator basis and an obligation to supply gas. In addition, the DSO is obliged to operate, maintain and overhaul the network, as well as to ensure its development and expansion.

*Law stated - 30 November 2022*

## **Access and pricing**

How is access to the natural gas distribution grid organised? Describe any regulation of the prices for distribution services. In which circumstances can a rate or term of service be changed?

The DSO is obliged to provide services on a third-party administrator basis (TPA). The rules for access to the distribution network are described in the Distribution Network Code (IRIESD). To obtain the customer status of the distribution service, the gas seller is obliged to conclude the general distribution agreement with the DSO.

The DSOs shall set tariffs for the distribution of gaseous fuels, which are subject to approval by the ERO president, and propose their duration. A licensed DSO submits a tariff and its amendment to the ERO president on its own initiative no later than two months before the expiration of the term of the previous tariff or at the request of the ERO president. Tariffs should be calculated in a manner that ensures (1) coverage of the justified costs of the business activities of enterprises in the distribution of gaseous fuels, together with a reasonable return on the capital employed in these activities and (2) coverage of the justified costs incurred by DSOs in connection with the performance of their tasks.

In the event of a documented change in the external conditions for the performance of economic activities by an undertaking, the ERO president may establish, ex officio, by way of a decision, correction coefficients resulting exclusively from the change in external conditions that the undertaking is obliged to apply to the prices and fee rates set out in the applicable tariff until the new tariff comes into force.

**System/service expansion and limitation**

May the regulator require a distributor to expand its system to accommodate new customers?  
May the regulator require the distributor to limit service to existing customers so that new customers can be served?

The DSO has a public-law obligation to connect customers to the distribution network, an obligation to provide services on a TPA basis and an obligation to supply gas. The connection of a customer to the distribution network is possible as a result of the fulfilment of economic and technical conditions.

The DSO is obliged to plan for the long-term development of the capacity of the gas system. The DSO is obliged to draw up a development plan for meeting the current and future demand for gas or energy, for a period of no less than three years. The draft development plan is subject to agreement with the ERO president, excluding the development plans of enterprises involved in the distribution of gas, to less than 50 customers, to whom this company supplies a total of less than 50 million m<sup>3</sup> of gas annually.

Law stated - 30 November 2022

**Contracts**

Describe the contractual regime in relation to natural gas distribution.

The customer has the option of concluding a comprehensive agreement (both for the sale and distribution of gas) with the seller of his or her choice or to conclude two separate contracts, one of which concerns distribution and is concluded with the operator, and the other concerning the purchase of gas from the seller selected by the customer. In the case of split contracts, the customer is responsible for balancing. Article 5(2)(2) of the Energy Law specifies what the contract for gas distribution services should contain. By virtue of the law, part of the contract for distribution services is the IRiESD and the tariff.

Law stated - 30 November 2022

**REGULATION OF NATURAL GAS SALES AND TRADING****Ownership and organisation**

What is the ownership and organisational structure for the supply and trading of natural gas?

A natural gas trading company may be a private company or with the state treasury share. The regulations do not introduce any restrictions other than the obligation to obtain a trading licence. In the case of the importation of natural gas from abroad, after obtaining a trade licence, an application should be submitted to the Energy Regulatory Office (ERO) president to grant a concession for trading gas with foreign countries.

At the end of 2021, 180 entities held a licence to trade in gaseous fuels, and at the end of the second quarter of 2022, 179 entities held a licence.

Law stated - 30 November 2022



## Government oversight

To what extent are natural gas supply and trading activities subject to government oversight?  
What authorisations are required to engage in wholesale trading of gas?

In order to trade in gas, a licence to trade in gas fuels is necessary. The licence is granted by the ERO president. In the event of an intention to import natural gas from abroad, after obtaining a licence to trade in natural gas, it is necessary to apply to the ERO president for a licence to trade in gaseous fuels from abroad.

The entities trading in gaseous fuels are obliged to sell no less than 55 per cent of the high-methane natural gas introduced into the transmission network in a given year on the exchange:

- at entry points to the national transmission system at connections with transmission systems of other countries;
- through the upstream pipeline network; or
- through liquefied natural gas terminals.

The Act provides for exceptions with respect to entities to which the exchange obligation does not apply.

Work is currently underway to adopt a Decree of the Minister of Climate and Environment to reduce the exchange obligation to 30 per cent.

In addition, entities trading in natural gas with foreign countries and entities importing natural gas from abroad, pursuant to the Stocks Act of 16 February 2007, are obliged to maintain mandatory stocks of natural gas in an amount corresponding to at least 30 days' average daily imports of that gas in the period from the 1 April of the previous year to 31 March of the given year. Gas stock calculated in this manner shall be maintained in the period from the 1 October of a given year to 30 September of the following year. The ERO president shall verify the volume of the mandatory stocks. Gas stocks may be maintained on Polish territory or outside it in facilities which ensure the possibility of supplying, on a continuous basis and under all conditions, the total volume of mandatory stocks of natural gas maintained outside Polish territory, to the national transmission or distribution network – in a period of no longer than 40 days. In the case of maintaining stocks outside Polish territory, an entity may use the capacity reserved for the supply of the total quantities of mandatory stocks of natural gas maintained outside Polish territory to the national transmission or distribution network only for these purposes. It may not use that capacity for commercial purposes.

Beyond this, Polish and EU legislation provides for solutions in crisis market situations. The Minister of Energy, upon receiving information from the gas system operator or the gas interconnected system operator, shall declare, by means of a regulation, a state of emergency referred to in article 11(1)(a) or (b) of Regulation (EU) 2017/1938, taking into account the expected inability to cover customers' demands for natural gas.

In the case of a state of emergency referred to in article 11(1)(c) of Regulation (EU) 2017/1938, the Minister of Energy shall declare, by means of a regulation, upon receipt of information from the gas system operator or the gas interconnected system operator on the occurrence of, inter alia, a threat to national gas security. In the event of the declaration of a state of emergency on Polish territory, the obligation to sell no less than 55 per cent of natural gas on the exchange shall be suspended for the duration of the state of emergency.

*Law stated - 30 November 2022*

## Trading processes



## How are physical and financial trades of natural gas typically completed?

The sale and purchase of gaseous fuels on the Polish wholesale market takes place primarily on the exchange market operated by TGE S.A. (the Exchange Commodity Market and, from 1 May 2020, the Organised Trading Platform (OTF)). Participants in the exchange market are mainly companies trading in gaseous fuels and the largest end-users, who may act independently after concluding an appropriate agreement with TGE S.A., becoming members of the Exchange Commodity Market (RTG) and OTF, respectively, or through brokerage houses or other entities with the status of RTG and OTF members from their own capital group that may conclude transactions on behalf of other entities belonging to the same capital group.

In 2021, TGE S.A. operated the following markets for the sale of gaseous fuels:

- the Intraday Market (RDBg),
- the Day-Ahead Market (RDNg); and
- the Forward Market for Products with Natural Gas Delivery (RTPG) of the OTF.

Gas fuel can be purchased on the forward market (between one month and three years in advance) or is purchased on an ongoing basis with delivery up to a few days ahead. Natural gas is also sold through an auction system. On the 1 May 2020, the Commodity Futures Market was transformed into the Forward Market for Products with Natural Gas Delivery (RTPG) of the OTF.

Standard contracts used in the market are consistent with the European Federation of Energy Traders templates.

*Law stated - 30 November 2022*

## Available services and products

Must wholesale and retail buyers of natural gas purchase a bundled product from a single provider? If not, describe the range of services and products that customers can procure from competing providers.

There is no requirement to purchase a bundled product on the Polish market. Both the wholesale trader and the retail customer may separately buy capacity up to Poland and capacity within the transmission system and separately purchase gas, for example, on the over-the-counter (OTC) market or the stock exchange. In the case of split contracts, the customer is responsible for balancing.

The transmission system operator (TSO) offers firm and interruptible capacity at entry and exit points as yearly, quarterly, monthly, daily or within-day products. Capacity at the entry and exit points is offered via auctions on a booking platform operated by the TSO (GSA-platform). According to Regulation (EU) No. 2017/459 establishing a network code on capacity allocation mechanisms in gas transmission systems and repealing Regulation (EU) No. 984/2013 (CAM NC), the capacity at IPs shall be offered as bundled capacity (see section 12, article 3 and section 1, article 8 of CAM NC).

In the case of a purchase of gas on an exchange, an entity that is a member of the exchange shall notify the TSO of the physical execution of the concluded exchange transaction for the purchase or sale of gas and may use the following transmission service provider (ZUP) code for this purpose:

- the ZUP code received from the TSO; or
- the ZUP code made available by another ZUP in accordance with the rules set out in the Exchange Regulations.

The place of delivery of natural gas can be an OTC virtual point or a physical point on one of the interconnections. Depending on the business decision, the final customer may also conclude a comprehensive agreement under which the gas supplier ensures both the gas and its transmission or distribution to the final customer.

*Law stated - 30 November 2022*

## REGULATION OF LNG

### Ownership and organisation

What is the ownership and organisational structure for LNG, including liquefaction and export facilities, and receiving and regasification facilities?

Poland has a liquid natural gas (LNG) import regasification terminal in Świnoujście, owned and operated by OGP Gaz-System S.A., which also acts as the sole transmission system operator in Poland. The regasification capacity of the terminal is a maximum of 54.4 TWh/year. The terminal also provides services in terms of:

- unloading LNG from tankers with a capacity of 120,000 m<sup>3</sup> to 217,000 m<sup>3</sup> LNG;
- in-process storage in tanks with a total capacity of 320,000 m<sup>3</sup> LNG; and
- the transshipment of LNG into tanker trucks.

An expansion of the LNG terminal in Świnoujście is currently underway from its current regasification capacity of 54.4 TWh/year to 91 TWh/year. The expansion programme also includes the construction of an additional quay for ships and the construction of a third LNG tank together with the required installations. In addition, the growing demand for gas fuels has led to the preparation of the design basis for a floating LNG terminal in the Gdansk Bay area, which would have LNG storage and regasification functions.

*Law stated - 30 November 2022*

### Regulatory framework

Describe the regulatory framework and any relevant authorisations required to build and operate LNG facilities.

The construction of an LNG terminal is regulated by the Construction Law, the Terminal Law and the Energy Law. In addition to the construction supervision authorities, the Technical Supervision Authority also oversees the commissioning of LNG terminals. Furthermore, a decision on environmental conditions is required.

The rules for connecting LNG facilities to the transmission system are regulated in the Energy Law, the Regulation on detailed conditions for the operation of the gas system and the IRIESP .

The operator of the natural gas liquefaction system may be a private company or may hold shares of the state treasury. The regulations do not impose any restrictions other than the obligation to obtain a licence for natural gas liquefaction and LNG regasification. The concession requirement applies to LNG facilities with a capacity of at least 200 m<sup>3</sup>/h. The concession is granted by the Energy Regulatory Office (ERO) president after meeting the requirements of the Energy Law.

In 2021, seven entities held concessions for business activity in the field of natural gas liquefaction and LNG regasification:

- PSG sp. z o.o.;
- Duon Dystrybucja S.A.;
- LNG Silesia sp. z o.o.;
- G.EN. GAZ Energia Sp. z o.o.;
- Polskie LNG S.A.; Blue Cold sp. z o.o.; and
- Zakład Budowlany Stanisław Andrysiewicz.

The operation of an LNG terminal and the provision of regasification services is defined in the LNG Terminal Code .

*Law stated - 30 November 2022*

## Pricing

Describe any regulation of the prices and terms of service in the LNG sector.

According to the Energy Law, a natural gas liquefaction system operator must have a tariff approved by the ERO president. The natural gas liquefaction system operator shall submit the tariff and its amendment to the ERO president on its own initiative no later than two months before the expiry of the previous tariff or at the ERO president's request. The tariff shall be calculated in such a way as to ensure that the justified costs of the economic activity of energy enterprises in the field of liquefaction or regasification of gaseous fuels are covered, together with a justified return on the capital employed in that activity.

*Law stated - 30 November 2022*

## MERGERS AND COMPETITION

### Competition authorities

Which government body may prevent or punish anticompetitive or manipulative practices in the natural gas sector?

The central government authority for the protection of competition and consumers under the Competition and Consumer Protection Act of 16 February 2007 is the president of the Office of Competition and Consumer Protection (the OCCP). The activities of the OCCP are supervised by the Prime Minister. He or she is appointed from among persons selected through an open and competitive recruitment process.

In turn, violations of Regulation 1227/2011 of the European parliament and of the council on wholesale energy market integrity and transparency with regard to manipulation on wholesale energy markets and unlawful use of inside information fall within the competence of the Energy Regulatory Office (ERO) president, who has the power to control REMIT, in accordance with the competence granted by the Energy Law.

*Law stated - 30 November 2022*

### Competition standards

What substantive standards does that government body apply to determine whether conduct is anticompetitive or manipulative?

There are no additional standards applied. The standards are regulated directly in the Competition and Consumer Protection Act. Only companies listed on the stock exchange are obliged to apply the corporate governance principles

of the Best Practices of Companies Listed on the Warsaw Stock Exchange .

*Law stated - 30 November 2022*

## **Enforcement**

**What authority does the government body have to preclude or remedy anticompetitive or manipulative practices?**

The powers of the OCCP president, with regard to the prevention of antitrust practices, are set out in the Competition and Consumer Protection Act. The powers of the OCCP president include exercising control over the compliance of entrepreneurs with the provisions of the Act and issuing decisions in cases of competition-restricting practices, in cases of concentration of entrepreneurs, in cases of recognition of the provisions of a standard agreement as prohibited and in cases of practices that infringe collective consumer interests. The OCCP president is authorised to conduct research into the state of concentration of the economy and market behaviour of entrepreneurs.

The ERO president's powers to prevent manipulation on the wholesale energy market are set out in Regulation 1227/2011 on wholesale energy market integrity and transparency with regard to manipulation on wholesale energy markets and the unlawful use of inside information and the Energy Law.

To prevent anti-competitive or manipulative practices on the market, an authorised employee of the ERO has the right to demand access to all kinds of documents, files and information carriers related to the subject of the inspection, to demand oral explanations or to carry out an inspection at the premises of the inspected entity, which, as a rule, does not have to be informed about such inspection. In the course of a REMIT inspection, the inspecting employee may even use the assistance of officers of other state control bodies or the police. Polish legislation has introduced two sanctions for infringement of the prohibitions set out in the EU regulation: a fine and criminal liability. A fine is imposed on anyone who obstructs the conduct of the aforementioned investigation, violates the obligation to publish inside information or to report data to the European Union Agency for the Cooperation of Energy Regulators, and also in the event of failure to register or update their data. On the other hand, a fine, restriction of liberty or imprisonment of up to five years may be imposed on the entity in the case of manipulation or attempted manipulation of the market and violation of the prohibition on using inside information, as well as in the case of a failure to provide the ERO president with information on reasonable suspicion of the aforementioned activities.

*Law stated - 30 November 2022*

## **Merger control**

**Does any government body have authority to approve or disapprove mergers or other changes in control over businesses in the sector or acquisition of production, transportation or distribution assets?**

The authority responsible for merger control is the OCCP president. The intention to concentrate shall be notified to the OCCP president if:

- the total worldwide turnover of the entrepreneurs participating in the concentration in the financial year preceding the year of notification exceeds the equivalent of €1 billion; or
- the aggregate turnover in Polish territory of the undertakings participating in the concentration in the financial year preceding the year of notification exceeds the equivalent of €50 million.

The obligation to notify an intention of concentration applies to:

- a merger of two or more independent entrepreneurs;
- the acquisition – by purchasing or acquiring shares or other securities, or in any other way – of direct or indirect control over one or more entrepreneurs by one or more entrepreneurs;
- the creation of a joint entrepreneur by entrepreneurs; and
- the acquisition by a businessperson of a part of property of another businessperson (the whole or a part of the business), if the turnover realised by this property in any of the two financial years preceding the notification exceeded, in Polish territory, the equivalent of €10 million.

*Law stated - 30 November 2022*

### **Price restrictions**

In the purchase of a regulated gas utility, are there any restrictions on the inclusion of the purchase cost in the price of services?

The operator has the right to accept only justified costs for the determination of the tariff. Justified costs within the meaning of the Energy Law are the costs necessary for the fulfilment of obligations arising in connection with the energy company's activities in the field of generation, processing, storage, transmission and distribution or trading of fuels or energy and adopted by the energy company for the calculation of prices and fee rates established in the tariff in an economically justified manner, with due diligence aimed at protecting the interests of consumers.

Justified costs are not tax-deductible costs within the meaning of the tax regulations.

*Law stated - 30 November 2022*

### **Corporate governance regulations**

Are there any restrictions on the acquisition of shares in gas utilities? Do any corporate governance regulations or rules regarding the transfer of assets apply to gas utilities?

There are no legal restrictions on the acquisition of shares in gas utilities with the exception of entities that are included in the list of protected entities regulated by the Decree of the Council of Ministers of 7 December 2021 on the list of protected entities and the control authorities competent for them.

Energy companies that are also listed on the stock exchange are obliged to apply the corporate governance principles of the Best Practices of Companies Listed on the Warsaw Stock Exchange.

The obligation to implement these is incumbent on every listed company on a 'comply or explain' basis. Reporting (mandatory reporting on voluntary compliance) on the application or non-application (as long as the company acts in good faith) is mandatory for every entity that falls within their scope of application, and failure to comply may result in a regulatory or administrative penalty.

*Law stated - 30 November 2022*

## **INTERNATIONAL**

### **Foreign participation**

## Are there any special requirements or limitations on foreign companies acquiring interests in any part of the natural gas sector?

The Principles of State Property Management Act of 16 December 2016 prohibits the disposal of shares or rights from shares owned by the state treasury, inter alia, in a company related to gas trading (Polskie Górnictwo Naftowe i Gazownictwo S.A.). The prohibition does not apply to the disposal of shares or rights from shares in a company in which the state treasury holds shares.

In connection with Russia's invasion of Ukraine, the parliament in Poland adopted the Anti-Aggression Act. Beyond this, the Ministry of Internal Affairs and Administration maintains a sanction list and issues decisions to include on the list persons and entities that directly or indirectly support Russia's aggression against Ukraine.

In terms of the international gas market, sanctions have been imposed on, among others, PAO Gazprom, one of the largest companies supplying gas to, inter alia, Western and Central European countries. As a result of the sanctions, PAO Gazprom's exercise of rights on shares and other securities and the freezing of dividends were frozen. As a result of the aggression in Ukraine, 100 per cent of PAO Gazprom's shares held in the Polish company System Gazociągów Transitowe EuRoPol Gaz S.A were placed under receivership.

Gazprom Export LLC was also listed, its main business being the export of natural gas. A freeze of all funds and economic resources was applied to the company and a ban on making available, directly or indirectly, any funds or economic resources. Similar sanctions were applied to the Russian company OAO Novatek, the second largest producer of natural gas. The company was excluded from public procurement procedures or competitions.

*Law stated - 30 November 2022*

## International agreements

### To what extent is regulatory policy affected by treaties or other multinational agreements?

The Polish gas market is part of the EU internal energy market and is subject to all EU regulations. Poland is obliged to comply with EU regulations, including Regulation 715/2009, which are directly implemented into Polish law. In the field of energy, Poland is obliged to implement numerous directives, which are binding as to their purpose and subject to harmonisation. Gas market players are regulated by the following network codes:

- NC CAM;
- NC BAL;
- NC TAR; and
- NC INT.

*Law stated - 30 November 2022*

## Cross-border sales and deliveries

### What rules apply to cross-border sales or deliveries of natural gas?

Imports and intra-community acquisitions of gas are regulated by the Stocks Act. According to the Stocks Act, an entity engaged in the business of trading natural gas with foreign countries and an entity importing natural gas (for its own use) are obliged to maintain mandatory stocks of natural gas in an amount corresponding to at least 30 days' average daily imports of that gas in the period from the 1 April of the previous year to 31 March of a given year. The gas stock

calculated in this manner shall be maintained in the period from the 1 October of a given year to 30 September of the following year. The Energy Regulatory Office president shall verify the volume of the mandatory stocks. Gas stocks may be maintained on Polish territory or outside it in facilities that ensure supplying, on a continuous basis and under all conditions, the total volume of mandatory stocks of natural gas maintained outside Poland, to the national transmission or distribution network in a period not longer than 40 days. In the case of maintaining stocks outside Poland, an entity may use the capacity reserved for the supply of the total quantities of mandatory stocks of natural gas maintained outside Polish territory to the national transmission or distribution network only for these purposes. It may not use this capacity for commercial purposes.

In addition, pursuant to the Regulation of the Council of Ministers of 24 April 2017 on the minimum level of diversification of gas supplies from abroad, the obligation to diversify is imposed on imports of natural gas from a single source in a given calendar year, which may not be higher than:

- 70 per cent in the years 2017 to 2022; and
- 33 per cent in the years 2023 to 2026.

Importation is understood, according to the Excise Duty Act, to be the importation of excise goods (excise goods include natural gas) from the territory of a third country into Polish territory, excluding the importation of natural gas from the Swiss Confederation or the member states of the European Free Trade Agreement – parties to the Agreement on the European Economic Area. Diversification is not subject to intra-community acquisition, including the importation of gas to Poland through the Mallnow entry, which constitutes intra-community acquisition with the use of reverse service.

*Law stated - 30 November 2022*

## TRANSACTIONS BETWEEN AFFILIATES

### Restrictions

What restrictions exist on transactions between a natural gas utility and its affiliates?

Entities subject to unbundling (distribution system operators (DSOs) and storage system operators (SSOs)) apply compliance programmes concerning the non-discriminatory treatment of users of a given gas system in relation with other companies of the same capital group. Operators have a statutory obligation to completely eliminate phenomena that may lead to discrimination against other market participants or service providers carrying out work for operators. Achieving the desired effects related to the ensuring of non-discriminatory treatment of the mentioned entities in the context of compliance programmes consists of three issues:

- the content of the programme – it should contain rules of conduct to eliminate discriminatory behaviour;
- the application of the programme – actively working to implement the programme and promoting specific actions and procedures; and
- the effective monitoring of and regular reporting on the implementation of the programme.

Operators appoint a compliance officer to monitor the implementation of the programmes.

*Law stated - 30 November 2022*

## Enforcement

### Who enforces the affiliate restrictions and what are the sanctions for non-compliance?

The DSOs and SSOs shall submit the compliance programmes referred to in article 9(d) paragraph 4 of the Energy Law to the Energy Regulatory Office (ERO) president on their own initiative or upon his or her request. The ERO president shall, by way of a decision, approve the programme referred to in paragraph 4 and set a deadline for its implementation or refuse to approve it if the actions specified therein do not ensure non-discriminatory treatment of system users. In the decision to refuse approval of the programme, the ERO president shall set a deadline for the submission of a new programme. The lodging of an appeal against the decision shall not suspend the obligation to submit a new programme for approval. The effectiveness of their actions is subject to verification by the ERO president through monitoring activities. Failure to eliminate the above is subject to the sanctions specified in article 56 of the Energy Law.

*Law stated - 30 November 2022*

## UPDATE AND TRENDS

### Gas sector-specific regulation

Describe recent trends and developments in the regulation of the domestic natural gas sector.

In 2021, the Polish government adopted the 'Energy Policy of Poland until 2040', which assumes an increase in the input and use of gaseous fuels in generating units. Natural gas prices (turnover) for the last tariff group, namely, households, were to be released from the tariff obligation at the beginning of 2024. However, due to the crisis in the gas market caused, inter alia, by Russia's aggression against Ukraine, in order to protect gas consumers, the Law on the Special Protection of Gas Fuel Consumers in 2022 was adopted in 2023 in connection with the gas market situation. This law extends the gas prices tariff for households until 2027. Moreover, the catalogue of entities subject to tariff gas prices was extended to include sensitive entities, for example, schools, hospitals, crèches and social care homes to the extent that they consume gas for basic activity needs.

In addition, regulations concerning biomethane have been introduced into the Polish legal system, and provisions have been made for the production, marketing and distribution of hydrogen. With plans to increase the use of synthetic gases, biogas, biomethane and hydrogen in Europe's gas networks, gas operators must engage in research and development into the feasibility of injecting these gases into the network, their transport and storage. The technical parameters of the existing networks currently allow only a small share of the transported mixture of gases other than natural gas, making it difficult to increase the use of the above decarbonised gases. As a target stimulating development in this area, it was indicated to achieve, by 2030, the capacity to transport a mixture containing approximately 10 per cent of gases other than natural gas (decarbonised gases: biomethane, hydrogen) through gas networks.

In Poland and other European countries, the European Union introduced regulations concerning gas filling levels in storage infrastructure. These regulations included Regulation (EE) 2022/1032 of the European parliament and of the council of 29 June 2022, amending Regulations (EU) 2017/1938 and (EC) No 715/2009 regarding gas storage. The Regulation in article 6(a) provided that underground storage facilities in the territory of the member states should be filled to at least 80 per cent by 1 November 2022 and 90 per cent by 1 November 2023. In total, Europe has already managed to meet the above obligation under the Regulation with 95 per cent. At the same time, in November this year, Poland almost completely (98 per cent) filled its gas storage facilities.

*Law stated - 30 November 2022*



### **Other regulatory developments of particular relevance to the gas sector**

Describe any other recent regulatory trends and developments of particular interest to those operating in the domestic natural gas sector.

In Poland, there is a great interest in hydrogen as an alternative fuel for transport in order to create a regulatory framework for the functioning of hydrogen and regulations defining the details of the functioning of the market. It is being considered to adopt regulations not in the form of an amendment but through the introduction of a 'Hydrogen Law' that will comprehensively and, in one place, regulate the operation of the hydrogen market.

The Baltic Pipe pipeline was completed in September 2022, which provides Poland with direct access to gas deposits located on the Norwegian Shelf. The undertaking was carried out by transmission network operators: the Polish GAZ-SYSTEM and the Danish Energinet. The investment implemented by GAZ-SYSTEM consisted of the construction of 275 km of offshore gas pipeline from Faxe in Denmark to Pogorzelica in Poland, as well as 231 km of domestic gas pipelines on the Goleniów – Lwówek and Niechorze – Płoty routes.

Also, in 2022, the Poland-Slovakia gas pipeline connection began. The constructed transmission infrastructure connected the gas hub in Strachocin in Poland with the Veľké Kapušany (Greater Kapuszyany) compressor station in Slovakia. Thanks to this investment, it will be possible to import 5.7 bcm of gas per year into Poland, and 4.7 bcm per year can be transmitted towards Slovakia.

The Poland-Lithuania gas interconnector also began in May 2022 to address gas supply security issues and end the isolation of the Baltic states from the EU gas market.

In terms of corporate changes, the merger was affected by the acquisition of PGNiG S.A. under article 492(1)(1) of the Commercial Companies Code by transferring all the assets of the acquired company to Koncern Naftowy Orlen S.A. The merger was affected on the basis of Resolution No. 4 of the extraordinary general meeting of the acquiring company of 28 September 2022. Currently, PGNiG S.A. operates as part of the Orlen S.A. Group.

*Law stated - 30 November 2022*

## Jurisdictions

	<b>Angola</b>	Vieira de Almeida & Associados
	<b>Austria</b>	Schima Mayer Starlinger
	<b>Brazil</b>	Campos Mello Advogados
	<b>Colombia</b>	Figueroa Sierra & Asociados Abogados
	<b>Denmark</b>	Bech-Bruun
	<b>East Timor</b>	Vieira de Almeida & Associados
	<b>Faroe Islands</b>	Bech-Bruun
	<b>Germany</b>	Luther Rechtsanwaltsgesellschaft
	<b>Greenland</b>	Bech-Bruun
	<b>India</b>	Clarus Law Associates
	<b>Iraq</b>	Al Hadeel Al Hasan Law
	<b>Italy</b>	CMS Italy
	<b>Mexico</b>	Galicia Abogados SC
	<b>Mozambique</b>	Vieira de Almeida & Associados
	<b>Nigeria</b>	ENR Advisory
	<b>Norway</b>	Kvale Advokatfirma
	<b>Poland</b>	Banasik Woźniak i Wspólnicy Kancelaria Radców Prawnych Sp. P.
	<b>Thailand</b>	Chandler MHM Limited
	<b>Turkey</b>	Kesikli Law Firm
	<b>United Kingdom</b>	Dentons
	<b>USA</b>	Step toe & Johnson LLP