DECISION

No.: 0002/2026/P-PP
File No.: 5211-2026-BA

Bratislava, 20 October 2026

The Regulatory Office for Network Industries, Gas Industry Regulation Department, acting as the authority competent to conduct proceedings pursuant to Section 15(4), in conjunction with Section 9(1)(b), point 2, and Section 9(1)(c), point 1, of Act No. 250/2012 Coll. on Regulation in Network Industries, as amended, in the matter of amending Decision No. 0001/2026/P-PP of 29 January 2026, by which the Office approved the Operating Regulations of the Distribution System Operator,

has decided

pursuant to Section 17(2)(g), in conjunction with Section 13(2)(a), of Act No. 250/2012 Coll. on Regulation in Network Industries, as amended, upon the application of the party to the proceedings, to amend Decision No. 0001/2026/P-PP of 29 January 2026 approving the Operating Regulations of the Distribution System Operator for SPP - distribúcia, a. s., Plátennícka 19013/2, 821 09 Bratislava, Business Registration No. 35 910 739, as follows:

The existing wording of the operative part of the Decision is replaced in its entirety by the following wording:

"Operating Regulations of the Distribution System Operator SPP - distribúcia, a. s.

The text of the Operating Regulations is provided in a separate document.

[This translation contains only source pages 1 and 111-115. Source pages 2-110 are omitted.]

This Decision forms an integral part of Decision No. 0001/2026/P-PP of 29 January 2026.

The Operating Regulations shall take effect on the date on which this Decision becomes final and binding.

Reasons:

1. On 9 September 2026, the Regulatory Office for Network Industries, Gas Industry Regulation Department (hereinafter the "Office"), received an application to amend the Operating Regulations approved by Decision No. 0001/2026/P-PP of 29 January 2026 (hereinafter the "application to amend the Operating Regulations") for the Distribution System Operator SPP - distribúcia, a. s., Plátennícka 19013/2, 821 09 Bratislava, Business Registration No. 35 910 739 (hereinafter the "party to the proceedings"). The application was registered under the Office's incoming reference No. 36621/2026/BA and placed in file No. 5211-2026-BA. Proceedings concerning approval of the application to amend the Operating Regulations commenced on that date.

   The application to amend the Operating Regulations included Annex No. 1, Overview of Proposed Amendments to the Operating Regulations of the Distribution System Operator (hereinafter "Annex No. 1"), and Annex No. 2, Overview of Proposed Amendments to the Operating Regulations of the Operator of the Registry of Renewable Gases (hereinafter "Annex No. 2").

2. According to the party to the proceedings, the grounds for amending the Decision are, in accordance with Section 17(2)(g) of Act No. 250/2012 Coll. on Regulation in Network Industries, as amended (hereinafter "Act No. 250/2012 Coll."), a change in the conditions on which the decision under Section 13 of Act No. 250/2012 Coll. was based, or the occurrence of circumstances justifying such a change. The party to the proceedings proposes the amendment because certain provisions of the Operating Regulations of SPP - distribúcia, a. s. need to be updated in line with the energy legislation adopted, in particular the amendment to Office Decree No. 208/2023 Coll. laying down the rules for the functioning of the internal gas market, the required content of the operating regulations of network operators and storage system operators, and the scope of the commercial terms and conditions forming part of network operators' operating regulations, as amended (hereinafter "Decree No. 208/2023 Coll."). The proposal also clarifies certain existing provisions and introduces substantive and technical changes arising from practical implementation, in particular concerning Guarantees of Origin in the G-REX system, the implementation of cross-border transfers of Guarantees of Origin for biomethane via the ERGaR Hub, the EECS Domain Protocol, etc. The proposal to update the Operating Regulations of the Registry of Renewable Gases was also submitted because of the Registry's connection to the AIB Hub platform, namely the implementation of cross-border transfers of Guarantees of Origin for biomethane and the issuing of EECS Guarantees of Origin for biomethane for cross-border transfers via the AIB Hub.

3. Pursuant to Section 19a(1) and (2) of Act No. 251/2012 Coll. on Energy and on Amendments to Certain Acts, as amended, the party to the proceedings is required to publish the proposed amendments to the Operating Regulations on its website and allow affected market participants a reasonable period in which to express their views and submit comments (hereinafter the "public consultation"). On 19 August 2026, by letter No. DE/2026/51 dated 18 August 2026, the party to the proceedings notified the Office that, pursuant to Section 19a of Act No. 251/2012 Coll., on 18 August 2026

a public consultation on the application to amend the Operating Regulations had commenced on the website of the party to the proceedings, with a closing date of 2 September 2026 (hereinafter the "notification"). The notification was registered under the Office's incoming reference No. 34838/2026/BA.

In accordance with Section 19a(2) of Act No. 251/2012 Coll., the Office simultaneously published a notice on its website announcing the start of the public consultation on the proposed amendment to the Operating Regulations of the party to the proceedings.

By letter No. D/10/2026 dated 8 September 2026, the party to the proceedings informed the Office that it had received no comments from gas market participants during the public consultation.

During the public consultation, the Office received no comments from gas market participants on the proposed amendment to the Operating Regulations of the party to the proceedings.

4. The Office examined the application to amend the Operating Regulations and, for the purpose of a more detailed examination of the supporting documents, by letter No. 37391/2026/BA dated 21 September 2026 requested the party to the proceedings to supplement its submission with a more thorough justification of the proposed amendments within 7 days of receipt of the request, in particular:

- Regarding clause 4.5.3 of Annex No. 1, provide a detailed justification of the proposed amendment to the wording.
- Regarding new clause 13.2.21 of Annex No. 1, add the precise interface specified in the technical conditions and add the relevant section to the footnote reference to the Energy Act.
- Regarding the Registry of Renewable Gases and the contractual documents published on the website of the party to the proceedings, provide general information on whether those documents are also being updated in response to legislative changes.
- Regarding the Registry of Renewable Gases, provide general data on transactions in Guarantees of Origin for the period from January 2026 to August 2026.
- Regarding the SPPD Domain Protocol, provide general information on whether it is also available in Slovak or only in English.
- Provide general information on the difference between the EECS (non-EECS) and SK GAS standards when transferring, importing or exporting Guarantees of Origin through the relevant hubs.
- Regarding new clause 6.4 of Annex No. 2, provide a detailed justification of the proposed wording.
- Regarding clause 7.2 of Annex No. 2, provide a detailed justification of the proposed amendment to the wording, or specify more precisely the other purpose permitted under the legislation and the rules of the relevant standard.
- Regarding new clause 7.4 of Annex No. 2, provide a detailed justification of the proposed wording.
- Regarding new clause 7.5 of Annex No. 2, provide a detailed justification of the proposed wording.
- Regarding new clause 8.1 of Annex No. 2, provide a detailed justification of the proposed wording.
- Regarding clause 15.1 of Annex No. 2, provide a detailed justification of the proposed amendment to the wording, for example by specifying more precisely the difference between cancellation and allowing a Guarantee of Origin to expire, etc.
- Regarding clause 15.9 of Annex No. 2, state the date of publication of the information under points (a) to (e) if the party to the proceedings has not yet published all the information concerned on its website.

5. On 29 September 2026, by letter No. D/12/2026 dated 29 September 2026, registered under the Office's incoming reference No. 38942/2026/BA, the party to the proceedings supplemented its submission in response to the Office's request No. 37391/2026/BA dated 21 September 2026.

6. On 6 October 2026, by letter No. 39797/2026/BA, the Office informed the party to the proceedings that, taking into account the extent of the anticipated effects on gas market participants arising from implementation of the proposed amendment to the Operating Regulations, it had classified these administrative proceedings as a particularly complex case and, pursuant to Section 49(2) of Act No. 71/1967 Coll. on Administrative Proceedings (the Administrative Procedure Code), as amended, would decide on approval of the amendment to the Operating Regulations no later than 60 days after the commencement of proceedings.

7. The Office re-examined the application to amend the Operating Regulations and the supplementary submission of 29 September 2026. For the purpose of a more detailed examination of the supporting documents, by letter No. 39798/2026/BA dated 6 October 2026, it requested the party to the proceedings to revise the wording and provide additional information demonstrating the justification for the proposed amendments, as follows:

- Regarding clause 2.7.10(f) of Annex No. 1, briefly describe the technological process.
- Regarding clause 13.2.21 of Annex No. 1, incorporate the clarified reference into the footnote text.
- Regarding Annex No. 2 and the SPPD Domain Protocol, submit a copy of SPPD's participation agreement with AIB dated 11 May 2026, or state when the party to the proceedings submitted a copy of that agreement to the Office for inspection.
- Regarding clause 6.1(d) of Annex No. 2, the Office recommends incorporating the designation "non-EECS" or an explanation in a footnote.
- Regarding clause 7.2 of Annex No. 2, the Office recommends incorporating the designation "other purpose" or an explanation in a footnote.
- Throughout Annex No. 2, the Office recommends adding references to the specific parts of the SPPD Domain Protocol governing the relevant procedures.
- Submit the updated Annexes No. 1 and No. 2 in Word format as well.

8. On 14 October 2026, by letter No. D/13/2026 dated 13 October 2026, registered under the Office's incoming reference No. 41039/2026/BA, the party to the proceedings supplemented its submission in response to the Office's request No. 39798/2026/BA dated 6 October 2026.

9. After examining the application to amend the Operating Regulations and the supporting documents supplemented in response to its requests No. 37391/2026/BA dated 21 September 2026 and No. 39798/2026/BA dated 6 October 2026, the Office found the application to amend the Decision to be well-founded. The party to the proceedings had demonstrated, through the documents and justification submitted, a change in the conditions on which Decision No. 0001/2026/P-PP of 29 January 2026 approving the Operating Regulations had been based.

10. The Office proceeded in close cooperation with the party to the proceedings, as required by the Administrative Procedure Code. For this reason, the Office maintained intensive written communication with the party to the proceedings. The consultations aimed to obtain sufficient information about the circumstances affecting the justification for the proposed amendments to the Operating Regulations of the party to the proceedings.

11. In proceedings concerning approval of the amendment to the Operating Regulations, the Office proceeds pursuant to Section 17(2)(g) and Section 15 of Act No. 250/2012 Coll., Section 19(7) of Act No. 251/2012 Coll., the Administrative Procedure Code and Decree No. 208/2023 Coll.

12. Pursuant to Section 17(2)(g) of Act No. 250/2012 Coll.: "The Office shall, upon the application of a party to the proceedings or on its own initiative, also amend or revoke a decision if the conditions on which the decision under Section 13 was based have changed, or if circumstances have arisen that justify such an amendment."

13. Pursuant to Section 17(4) of Act No. 250/2012 Coll.: "Sections 14 to 16 shall apply, as appropriate, to proceedings concerning the amendment or revocation of a decision."

14. Pursuant to Section 32(1) of the Administrative Procedure Code: "The administrative authority shall establish the facts of the case accurately and comprehensively and obtain the documents and evidence necessary for its decision. In doing so, it shall not be bound solely by the proposals of the parties to the proceedings."

15. Pursuant to Section 32(2) of the Administrative Procedure Code: "The basis for a decision shall consist, in particular, of submissions, proposals and statements of the parties to the proceedings, evidence, declarations on honour, and facts that are generally known or known to the administrative authority from its official activities. The scope and method of obtaining the documents and evidence for the decision shall be determined by the administrative authority. Data from public administration information systems and extracts therefrom, other than data and extracts from the Criminal Register, shall be deemed generally known facts and may be used for legal purposes. A party to the proceedings or a participating person need not substantiate these data to the administrative authority by documentary evidence. Documents issued by the administrative authority and the contents of its own records shall be deemed facts known to the administrative authority from its official activities, which a party to the proceedings or a participating person need not substantiate to the administrative authority by documentary evidence."

16. Pursuant to Section 34(3) of the Administrative Procedure Code: "A party to the proceedings shall propose evidence known to it in support of its assertions."

17. Pursuant to Section 33(2) of the Administrative Procedure Code: "Before issuing a decision, the administrative authority shall give the parties to the proceedings and participating persons an opportunity to comment on the basis for the decision and the manner in which it was established, and, where appropriate, to propose that it be supplemented."

18. Under Section 41 of Act No. 250/2012 Coll., Section 33(2) of the Administrative Procedure Code does not apply to these proceedings, because the Office based its decision solely on the documents submitted by the party to the proceedings, whose application was granted in full.

19. In these proceedings, the Office relies on documents forming part of administrative file No. 5211-2026-BA.

20. The Office states that, in the interests of certainty, clarity and ease of reference, the operative part of the Decision is set out in full.

21. On the basis of the above facts, the Office has decided as stated in the operative part of this Decision.

Notice of Appeal Rights:

An appeal may be lodged against this Decision. The appeal must be submitted to the Regulatory Office for Network Industries, Gas Industry Regulation Department, within 15 days of notification of the Decision. This Decision is subject to judicial review after all ordinary remedies have been exhausted.

Ing. Richard Ružička
Director of the Gas Industry Regulation Department

This Decision shall be served on:
SPP - distribúcia, a. s., Plátennícka 19013/2, 821 09 Bratislava