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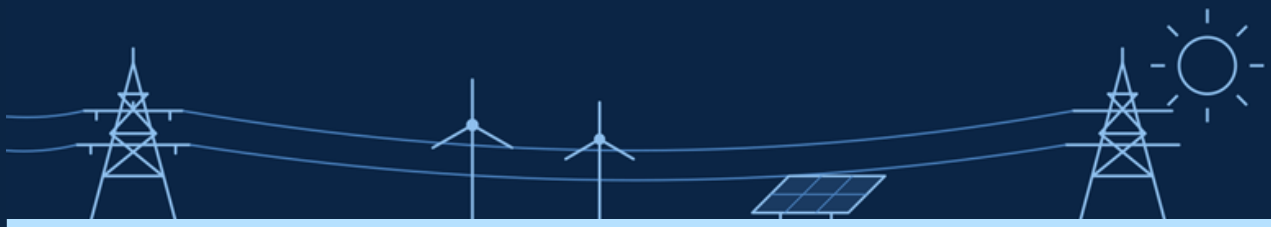
UKRAINE ENERGY INITIATIVE

Global Compact Network Ukraine

September 2026

ENERGY REGULATORY DIGEST

Overview of legislative and regulatory developments in Ukraine's energy and construction sectors



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KEY DEVELOPMENTS

ENERGY SECTION



President signs law implementing EU legislation on renewable energy sources

On 25 September 2026, the President signed Law No. 4963-IX of 2 September 2026 "On Amendments to Certain Legislative Acts of Ukraine Regarding the Implementation of European Union Legislation in the Field of Renewable Energy Sources" (draft law No. 14271; a European integration bill aimed at implementing Directive (EU) 2018/2001 (RED II)). The Law was published on 30 September 2026 and entered into force on 1 October 2026. Certain provisions, in particular those on the publication by transmission and distribution system operators of the share of renewable energy sources (RES) and of specific greenhouse gas emissions, will enter into force 12 months after the first day of the month following the month in which martial law is terminated or lifted.

Among other things, **the Law updates RES terminology**; introduces sustainability criteria, accounting, certification and audit for biofuels, bioliquids and biomass; sets time limits for permit-granting procedures and moves them into electronic format; and regulates renewables acceleration areas, the status of renewable energy communities and of renewables self-consumers.

Renewable energy communities operate on the basis of voluntary and open participation, with the aim of providing environmental, economic and social benefits for their members or for the local areas; they may participate in energy markets on a non-discriminatory basis, directly or through an aggregator, while their members retain their rights as consumers. **Community status does not arise automatically for any association of co-owners of an apartment building (OSBB)** or energy cooperative – compliance with the requirements of the Law is required.

New rule on the non-standard connection fee for BESS: for battery energy storage systems (BESS), the capacity component of the non-standard connection fee will be calculated as the product of the non-standard connection fee rate (set separately for BESS) and **the greater of two values:**

- the additionally requested capacity for **withdrawal;**
- the additionally requested capacity for **injection.**

The National Energy and Utilities Regulatory Commission **(NEURC) must adopt the relevant regulatory acts within 45 days** of the new Law entering into force.

PRICE CAPS

NEURC's powers in respect of price caps on the day-ahead market (DAM), the intraday market (IDM) and the balancing market (BM) are now **limited solely to temporary maximum price limits**: the reference to minimum limits has been removed from clause 1-1 of part 2 of Article 17 of the Law "On the National Energy and Utilities Regulatory Commission" (the NEURC Law) and from paragraph 7 of clause 9 of Section XVII of the Law "On the Electricity Market".

PERMIT-GRANTING PROCEDURES

The total duration of all permit-granting procedures for the construction, grid connection and commissioning of RES facilities must not exceed 12 months in renewables acceleration areas and 24 months outside them (24 and 36 months respectively for offshore wind power plants). For solar installations with a capacity of up to 100 kW the time limit is 30 days; for heat pumps with a capacity of up to 50 MW – 30 days (90 days for geothermal (ground-source) heat pumps); and for repowering (technical re-equipment) that increases capacity by no more than 15% and does not require an environmental impact assessment – three months.

The competent authority must decide on permits, the connection agreement and the technical specifications within 30 days in renewables acceleration areas and 45 days outside them. Applications are submitted electronically via the Unified State Web Portal of

Electronic Services and/or the Unified State Electronic System in the Construction Sector (USESCS). For the purposes of permit-granting procedures, RES projects, including those with BESS, are recognised as being in the public interest, provided that measures are taken to prevent significant adverse environmental impact.

These time limits do not include the time needed for preparatory and construction works or for administrative and judicial appeals. The Law allows the time limits to be extended in specified cases. Separately, for solar installations (including those with BESS and those on buildings that are not electricity sector facilities) Article 14-7 sets a time limit of three months (the 30-day time limit is a special rule for solar installations of up to 100 kW).

Practical application will depend on the operation of the contact points (the Unified State Web Portal of Electronic Services and/or the USESCS, interacting with other compatible electronic information systems and networks that constitute the State's information resource, in accordance with the legislation) and on decisions on renewables acceleration areas. When designating such areas, the Law requires the exclusion of nature conservation areas and sites, Natura 2000 sites, wetlands of international importance and areas above 1,000 m above sea level – which limits the use of accelerated procedures for wind projects in the high Carpathians.

AUCTIONS

A participant in a support quota allocation auction will be able **to submit no more than one closed bid for each facility (construction stage).** An auction will be deemed to have taken place if bids have been submitted by more than one participant. Participants must not be linked to one another by relations of control. Renewable energy communities will be able to acquire the right to support through an auction on equal terms with other producers, and the Cabinet of Ministers will be able to determine the specifics of their participation in the relevant auction.



RENEWABLES SELF-CONSUMERS

The Law introduces peer-to-peer trading of electricity from RES, the procedure for which will be determined by NEURC. Such consumers may sell their surplus independently or through an aggregator – under the self-production mechanism (net billing), at the “green” (feed-in) tariff or under a peer-to-peer trading agreement.

“GREEN” TARIFF FOR HOUSEHOLDS

Under the new wording of part 5 of Article 9-1 of the Law “On Alternative Energy Sources”, **the “green” tariff is set and applies to a private household subject to two conditions:**

- there is a building (buildings) within the household;
- the household consumes at least 10 kWh of electricity per month.

If the household consumes less, the universal service supplier (USS) purchases the volume by which injection into the grid exceeds consumption at the DAM price for the relevant hour. This price may not be higher than the price at which the USS supplies electricity to household consumers.

In the wording in force before 1 October 2026, the conditions concerning the building and consumption (without a minimum threshold) applied only to installations commissioned from 1 January 2024. The new wording contains no such qualification. Formally, therefore, **both conditions will apply to all private households with a “green” tariff, regardless of the date on which the installation was commissioned.** In addition, from 26 September 2026, electricity injected into the grid by household solar installations during night-time hours, as well as volumes exceeding the permitted hourly injection, are paid for at the lower of two values – the “green” tariff or the DAM price – subject to the statutory exception for BESS and the conditions for its application (NEURC Resolution No. 1566).



OTHER

Underground cable power lines may now be built beneath field-protective forest belts. Natural gas transmission and storage contracts have been recognised as public contracts. The moratorium on the enforcement of decisions against distribution system operators (DSOs) whose area of operation covers areas of hostilities or temporarily occupied territories (as at 31 December 2023), insofar as it concerns debt owed to SE Energorynok, has been extended until 1 January 2028.

The rules for calculating the "green" tariff after reconstruction, restoration and major repairs have been extended to emergency repairs; a producer must notify NEURC of an emergency repair that increases installed capacity within 10 days of its completion. Under the temporary procedure for exporting biomethane by pipeline (pending connection of the Ukrainian biomethane register to the Union database), the certificate submitted to the customs authority must confirm compliance not only with the sustainability criteria but also with the greenhouse gas emissions saving criteria.

The Law also sets **the framework for state support programmes for households:** incentives for installing solar installations of up to 10 kW together with BESS at a ratio of at least 0.5 kWh of storage capacity per 1 kW of generating capacity.

Article 7 "Information support for activities in the field of alternative energy sources", which has been added to the Law "On Alternative Energy Sources", obliges the Cabinet of Ministers to publish information on RES support measures on its website, and the central executive authority responsible for RES, together with other state authorities and local self-government bodies (with their consent), to develop and publish information, awareness-raising, career guidance or training programmes on the rights of active consumers and on the technical and financial aspects of using renewable energy, including self-generated energy and energy used within renewable energy communities.



In addition, until 1 January 2030, detailed plans of territories for the siting and servicing of energy facilities outside settlements, where no comprehensive spatial development plan of the community has been approved, are to be developed and approved taking into account district and/or regional (oblast) planning schemes (where available), **which simplifies spatial planning for energy projects in such communities.**

Implications

Some of the new provisions require secondary legislation: the Cabinet of Ministers must bring its acts into line with the Law within six months, and NEURC must adopt the acts on BESS connection within 45 days. RES developers should take into account the new time limits for permit-granting procedures together with the exceptions and possible extensions, while owners of household solar installations should check whether the conditions regarding the presence of a building and minimum consumption of 10 kWh per month are met.

NEURC approves draft amendments on dynamic electricity prices for owners of smart meters

On 15 September 2026, NEURC approved for public consultation draft amendments to the Retail Electricity Market Rules (pursuant to Law of Ukraine No. 4834-IX of 7 April 2026).

The key novelty is the right of consumers with smart meters to conclude dynamic electricity price contracts, under which the price will change in line with price fluctuations on the day-ahead and intraday markets. Switching is not mandatory – the decision is taken by the consumer. The supplier must inform the consumer not only of the potential savings but also of the risks and costs associated with such a contract. Suppliers serving more than 200,000 consumers are obliged to offer this option to owners of smart meters.

The draft also makes switching electricity supplier free of charge for household and small non-household consumers (a commercial offer may not include a fee for switching supplier; the draft retains the requirement to disclose the existence and amount of any contractual penalties for early termination, while the permissibility of charging them is determined by the legislation and the terms of the contract) and allows consumers to choose a supplier registered in an EU Member State or an Energy Community Contracting Party, provided that it has been admitted to operate on the Ukrainian market. The draft was published on 16 September 2026; comments were accepted until 28 September 2026.

Implications

This is a step towards detailing the rules for applying dynamic pricing in the retail segment of the electricity market – an element of further integration with the European market.

Important for electricity suppliers with more than 200,000 consumers: the draft does not provide for a separate transitional period for this obligation – the resolution is to enter into force on the day following the day of its publication (only certain provisions unrelated to this obligation are deferred until 1 January 2030). The final timeframe will depend on the wording NEURC adopts following the consultation.

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NEURC proposes keeping DAM, IDM and BM price caps at the current level

On 24 September 2026, NEURC approved and, on the evening of the same day, published for consultation the draft resolution "On Price Caps on the Day-Ahead Market, Intraday Market and Balancing Market".

The draft proposes to leave unchanged the current round-the-clock maximum price limits (price caps) set by NEURC Resolution No. 621 of 23 April 2026:

- UAH 15,000/MWh on the DAM and the intraday market (IDM);
- UAH 17,000/MWh on the balancing market (BM).

The minimum price limits (price floors) also remain unchanged:

- UAH 10/MWh on the DAM/IDM;
- UAH 0.01/MWh on the BM.

If adopted, the provisions of the resolution will apply from 31 October 2026. Comments were accepted until 27 September 2026; an open discussion was scheduled for 1 October 2026.

Implications

For generators, traders and BESS operators, **this signals the proposed retention of the current maximum limits from 31 October 2026**, without a return to the hourly differentiated caps that applied in April 2026 (from UAH 5,600 to UAH 15,000/MWh on the DAM/IDM depending on the hour of the day; set by NEURC Resolution No. 70 of 16 January 2026). The current price range is preserved for storage and peaking generation. Arbitrage returns will, as before, depend on the actual hourly spread.

Once Law No. 4963-IX has entered into force (1 October 2026), NEURC will be able to set only temporary maximum price limits, so the minimum price limits in the draft will need to be aligned with the new wording of the law.

NEURC proposes introducing negative prices on the day-ahead and intraday markets

On 15 September 2026 the Commission approved, and on 16 September 2026 published for consultation, draft amendments to the Day-Ahead Market and Intraday Market Rules introducing the possibility of buying and selling electricity under a negative price procedure and, accordingly, of providing an electricity consumption stimulation service.

Under the draft, where a zero or negative price is formed on the DAM or IDM, the traded volume is recorded at the lowest positive price of UAH 10/MWh (excluding VAT), and the buyer provides the seller with a consumption stimulation service at a value equal to the absolute value of the negative price plus UAH 10/MWh.

In other words, during negative-price hours the seller effectively pays the buyer. The amendments are to apply from the day on which market coupling becomes operational.

Implications

The introduction of negative prices is a mandatory technical and legal prerequisite for the full coupling of the Ukrainian and EU electricity markets (within the Single Day-Ahead Coupling (SDAC) mechanism). Market coupling involves joint price formation and implicit allocation of cross-border capacity. For BESS operators and flexible consumers, negative prices may broaden price arbitrage opportunities; however, the amendments will become practically relevant only once market coupling is launched.



President signs law improving the functioning of industrial parks

On 2 September 2026, the Verkhovna Rada of Ukraine adopted the Law "On Amendments to Certain Legislative Acts of Ukraine Regarding the Improvement of the Functioning of Industrial Parks" (draft law No. 12117), and on 25 September 2026 it was signed by the President of Ukraine (Law No. 4961-IX of 2 September 2026). The Law was published on 26 September 2026 in the Holos Ukrainy newspaper.
The Law comprehensively updates the legal framework for the creation, arrangement (infrastructure development) and functioning of industrial parks, including land, urban planning, organisational and infrastructure aspects.

One of the changes is that **industrial park land becomes a separate type of intended purpose of land plots.** To this end, the list of land categories in Article 19 of the Land Code is supplemented with industrial park land, and the provision classifying it as industrial land is removed.

Plots of industrial land on which industrial parks are already located will be deemed industrial park land (the relevant information will be entered in the State Land Cadastre at the request of the owner or land user, without the need to prepare land management documentation). Changing the intended purpose of such land will be prohibited for the term for which the industrial park was created. At the same time, the existing cap of 1,000 ha on the maximum area of an industrial park is removed from the legislation.

The list of facilities that may be located within an industrial park is significantly expanded and specified. **It includes dual-purpose structures, alternative energy facilities and battery energy storage systems (BESS), as well as office premises, catering establishments, hotels and hostels.** In addition, it will be possible to classify the electricity networks of an industrial park as a small distribution system without the requirement for connected capacity of at least 1,000 kW (amendment to part 4-1 of Article 49 of the Law "On the Electricity Market", effective from 26 December 2026).

T**he Law also introduces the notion of an eco-industrial park and enshrines the concept of industrial symbiosis.** This covers, in particular, the treatment and reuse of waste between production facilities, the use of by-products, water reuse, cogeneration, and the production and use of energy from renewable sources. The criteria for an eco-industrial park, the procedure for obtaining this status and the specifics of its functioning are to be determined by the Cabinet of Ministers, so in practice the status will become operational once the relevant acts are adopted.

Separately, **the procedure for including an industrial park in the Register of Industrial Parks has been amended.** The initiator of the creation of the park will submit an application in the form established by the authorised state body. The application must be accompanied, in particular, by information (extracts) from the State Land Cadastre, an extract from the urban planning documentation for the territory of the park, and documents confirming the availability of financing for its arrangement and/or functioning in accordance with the concept. If the park is created on leased land, a copy of the lease agreement with all amendments and a copy of the lessor's decision approving the concept of the park are also required.

The Law makes it possible **to create an industrial park and include it in the Register without first developing a detailed plan of the territory** (DPT). This option applies where special provisions of land and urban planning legislation allow the intended purpose of a land plot to be established or changed on the basis of a reasoned opinion of the authorised urban planning and architecture body. In that case, the territory of the park is determined, its arrangement is carried out and the urban planning conditions and restrictions for development are defined in accordance with that opinion. The Law expressly provides that, in such circumstances, **the absence of approved urban planning documentation at the local level does not prevent the creation of an industrial park,** its inclusion in the Register or its functioning.



From 26 December 2026, the arrangement of an industrial park will not in itself require an environmental impact assessment (EIA): this item is being removed from the list of activities subject to EIA (paragraph 2 of clause 10 of part 3 of Article 3 of the Law “On Environmental Impact Assessment”). At the same time, specific production facilities and installations within a park will continue to undergo EIA if they fall within the list set out in that Law.

The Law also establishes **requirements for the transparency of financial relations in the public sector:** state-owned and state-controlled business entities that perform special obligations (public service obligations) or enjoy special or exclusive rights and at the same time carry on other activities must keep separate accounts for the relevant operations and submit reports in accordance with the procedure determined by the Cabinet of Ministers. These amendments to the Law “On Management of State Property Objects” entered into force on 27 September 2026 and primarily concern state-owned energy companies entrusted with public service obligations (PSO).

Entry into force: **the main part of the Law enters into force three months after the day of its publication** (published on 26 September 2026; according to the official web portal of the Verkhovna Rada – from 26 December 2026). Certain provisions (clause 3 of Section I and clauses 2–4 of Section II) entered into force on 27 September 2026.



New requirements for protective structures in urban planning and design documentation

On 8 September 2026, amendments to the Law of Ukraine "On Regulation of Urban Planning Activity" introduced by the Law of Ukraine of 10 February 2026 No. 4778-IX "On Amendments to Certain Legislative Acts of Ukraine on the Prevention of Emergencies and Elimination of Their Consequences, Formation of the Fund of Protective Structures of Civil Protection, and Creation of Safety Classes and Centres" entered into force.

A scheme of protective structures becomes a mandatory component of urban planning documentation approved at the local level. It determines the location of protective structures of civil protection and dual-purpose structures of all forms of ownership within the existing and planned built-up areas of settlements, based on the need for such structures. Publicly accessible protective structures located on communally owned land where no land plots have been formed are identified separately.

To resolve the matter promptly, **the scheme may be developed as a separate electronic document entered in the Register of Construction Activities** – before the comprehensive spatial development plan of the community's territory or the master plan is approved. The decision to develop it is taken by the head of the community (in wartime – by the head of the military administration); **such a document is not subject to expert examination**, strategic environmental assessment or public consultation, is reviewed by the architectural and urban planning council with the participation of the civil protection authority, and is approved by the urban planning and architecture body and the executive body of the council.



The section on civil protection engineering and technical measures in design documentation is now mandatory for facilities of consequence classes CC2 and CC3 in which more than 50 persons will be present permanently or more than 100 periodically, as well as for other facilities on a list approved by the Cabinet of Ministers. The requirements for the measures themselves will be set by building codes, and design solutions must ensure accessibility for persons with disabilities and other low-mobility groups. The section is not prepared for facilities included in the list of construction works that do not require permitting documents and are not subject to acceptance into operation.

The construction of protective structures of civil protection and/or dual-purpose structures must be provided for in the new construction of CC2/CC3 apartment buildings, dormitories and hotels in which more than 50 persons will be present permanently or more than 100 periodically, and also – regardless of the form of ownership – of educational, healthcare and social protection institutions, administrative service centres, passenger stations (terminals) with passenger traffic of 1,500 persons per day or more, metro facilities, airports, and sea and river ports. For other CC2/CC3 public buildings the threshold is more than 150 persons permanently or more than 500 persons periodically.

Shelters are also mandatory for facilities whose employees are to be sheltered in sealed shelters (skhovyshcha) under the Code of Civil Protection, for facilities of business entities assigned to civil protection categories, and for critical infrastructure facilities of criticality categories I–IV where personnel are present permanently and/or periodically – which directly concerns energy companies.



The same requirement **applies to reconstruction if it changes the functional purpose of the facility to one of the categories defined by the Law** (except for the reconstruction of a non-separated part of a facility).

In addition, at the initiative of the developer (construction customer), design documentation for the new construction of apartment buildings, public buildings and structures may provide for protected spaces. Unlike facilities forming part of the fund of protective structures, these are intended to protect the owners (users) of the facility, and access by other persons is possible only by their decision.

Transitional rule: the new requirements apply to facilities for which the right to build was obtained after Law No. 4778-IX entered into force (8 September 2026). If the right to carry out construction works was obtained earlier, it is not mandatory to provide for the construction of a shelter in the design (clause 6-9 of Section V of the Law "On Regulation of Urban Planning Activity"); other applicable safety requirements remain in force.

Government proposes a warranty of at least 10 years for new real estate

On 14 September 2026, **the Government** registered in the Verkhovna Rada **draft law No. 16071** (amendments to Article 884 of the Civil Code of Ukraine and the addition of Article 39-4 to the Law "On Regulation of Urban Planning Activity"); the lead committee is the Committee on Legal Policy.

The Government proposes to establish a warranty period of at least 10 years for completed facilities accepted into operation. A ten-year contractor's warranty period is already provided for by the current Article 884 of the Civil Code; what is new is that it will run from the date on which the facility is accepted into operation (currently – from the date on which the facility is accepted by the construction customer (developer)), and that the quality warranty to the property owner is provided by the developer.

The developer or its legal successor will be liable for the quality of the facility during this period – for defects that affect the fitness of the facility for use and that arose through its fault or the fault of the contractor.

A separate defect notification procedure is envisaged: defects affecting the normal use of the property must be confirmed by a report from a certified specialist; within 30 calendar days of receiving the notice together with the report, the developer must propose a method and timeframe for remedying the defects or provide a reasoned refusal, and the owner must, within 7 calendar days, accept or reject the proposals.

By agreement with the developer (its legal successor), **the owner will be able to remedy the defects independently or by engaging third parties**; in that case the draft provides for full reimbursement of the relevant costs. In the absence of agreement or in the event of failure to perform obligations, the dispute is to be resolved in court.

Exceptions are provided for facilities built on the basis of a construction passport and for CC1 facilities built by the owner's own efforts (without engaging a contractor). Entry into force is proposed from the day following the day of publication, but not earlier than the entry into force of the Law "On Consumer Rights Protection" No. 3153-IX of 10 June 2023.



Government sets conditions for arranging safe spaces and for business operations during an air threat

On 18 September 2026, Resolution of the Cabinet of Ministers of Ukraine No. 1128 of 15 September 2026 (amending CMU Resolution No. 1092 of 4 September 2026), which introduced the concept of a "safe space", entered into force.

A safe space means the most protected areas in premises, buildings or structures designated by balance holders, which are arranged within the existing space-planning solutions and must protect staff and visitors from the secondary effects of conventional weapons and from the maximum blast overpressure; the pressure value is determined by the Ministry of Defence and the General Staff of the Armed Forces, and compliance is confirmed by the balance holder's calculations.

The resolution does not establish separate requirements for design documentation. At the same time, the maximum overpressure value must be communicated, among others, to design and expert examination organisations so that it can be taken into account when developing space-planning solutions and creating safe spaces; designers would therefore be well advised to take it into account already now (*Altelaw recommendation*).

In addition, the balance holder and business entities **must place signs at the entrances to premises reading "Facility provided with a shelter",** "Facility provided with a safe space" or "Facility not provided with a shelter", measuring 100 × 60 cm, and must determine the procedure for staff actions in the event of an "Air raid alert" signal.

Having a safe space allows a business entity to continue operating during a "yellow" threat level. Business entities without a shelter may operate at the yellow level, with the consent of the workforce, until a shelter is arranged, but for no longer than three months from the date on which Resolution No. 1092 entered into force.



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The resolution does not provide for a separate procedure for approving a safe space with the State Emergency Service of Ukraine or other authorities. This does not relieve entities from other applicable construction and safety requirements.

At the same time, it should be borne in mind that **a safe space is not a substitute for a protective structure of civil protection or a dual-purpose structure.**

Where the law requires a protective structure of civil protection to be designed as part of a facility in new construction or reconstruction, the existence of a designed safe space does not remove this obligation.

Ministry for Recovery, Infrastructure and Transport proposes permissible deviations from the design for acceptance of facilities into operation

On 11 September 2026, the Ministry for Recovery, Infrastructure and Transport of Ukraine published for public consultation a draft resolution of the Cabinet of Ministers "On Amendments to Certain Resolutions of the Cabinet of Ministers of Ukraine Regarding Permissible Deviations for Completed Construction Facilities". It concerns cases where the actual parameters of a completed facility according to its technical passport (floor area, height, built-up area) differ slightly from those provided for in the design documentation.

If the discrepancies do not exceed the permissible deviations, the developer (construction customer) will be able, before submitting the documents for acceptance of the facility into operation, **to draw up a discrepancy protocol in the Unified State Electronic System in the Construction Sector** (USESCS). It must be confirmed by electronic signature by the persons carrying out designer's (author's) supervision and technical supervision and by the contractor (if any) – within three working days. The confirmed protocol is attached to the documents for acceptance into operation and may not serve as grounds for refusing to register the declaration or to issue the certificate.

The permissible deviation in total floor area is proposed at between 3% and 10% depending on the type and area of the facility (for example, 10% for apartments and non-residential premises of up to 50 m², 3% for buildings of 500 m² or more); for houses, buildings and structures, deviations in maximum height (1.5%) and built-up area (1%) are also proposed.

A protocol may not be drawn up if the discrepancies concern the maximum parameters defined by the urban planning conditions and restrictions, the consequence class, the number of storeys, construction stages, the number or functional purpose of buildings and premises, or a reduction in the energy efficiency class, or where building codes have been violated or there are signs of unauthorised construction. The mechanism does not apply to linear facilities of engineering and transport infrastructure.

The draft also provides for the automatic transfer of updated facility characteristics from the USESCS to the State Register of Property Rights to Immovable Property, automated correction of the address following adjustment of the design documentation, the owner's (co-owner's) consent to be given by electronic signature, and simplification of technical inventory by means of the USESCS. Comments were accepted within 15 days of publication. Under the draft, the provisions on the discrepancy protocol and permissible deviations are to enter into force six months after the day of publication of the resolution; until then, the current rules for acceptance of facilities into operation apply.



DIAM's first practice on appeals against refusals to issue urban planning conditions and restrictions: 6 of 14 complaints reviewed upheld

On 21 September 2026, the State Inspectorate of Architecture and Urban Planning of Ukraine (DIAM) published the first results of the mechanism for administrative appeals, via the USESCS, against refusals to issue urban planning conditions and restrictions (UPCR). In the first month, 22 complaints were received, most of them from Kyiv and Kharkiv.

Chief inspectors of construction **supervision reviewed 14 complaints:**

- in 8 cases, the refusals were upheld;
- in 6 cases, the refusals were found to be unjustified and the complaints were upheld.

The published information reveals the following **reasons and requirements of urban planning** and architecture bodies that DIAM **found unjustified:**

- a requirement to submit a decision of the urban planning council, given that such a council is an advisory body;
- a reference to the absence of a mandatory document (an excerpt from the topographic and geodetic plan at a scale of 1:2000), although the document had in fact been submitted;
- a reference to the absence of the cadastral number of the land plot in the application, although the application concerned the reconstruction of a facility, for which such a number is not required in that case;
- formal comments on the name of the facility;
- a reference to the inconsistency of the development intentions with the functional purpose of the territory, although the application concerned the reconstruction of an existing facility without changing its geometric parameters or purpose;
- the development intentions exceeding the permissible height, whereas the body should have set the height restriction in the UPCR themselves rather than refusing to issue them.

DIAM's first practice on appeals against refusals to issue urban planning conditions and restrictions: 6 of 14 complaints reviewed upheld

These examples can be used when preparing a complaint against a refusal to issue UPCR (procedure for filing via the USESCS); however, each position should be checked against the circumstances of the specific project and Article 29 of the Law "On Regulation of Urban Planning Activity", which sets out the list of documents for obtaining UPCR and the grounds for refusal.

MARKET SIGNALS

Support quota allocation auctions held for solar, solar-plus-BESS and wind power plants

25 September 2026 – support quota allocation auctions were held for new solar power plants (SPPs) and SPPs with BESS (SPP+BESS). According to the announcement by the Guaranteed Buyer, 26 bids with a total capacity of 385.94 MW at prices ranging from 5.97 to 11.45 euro cents/kWh were submitted for the auction for SPPs with BESS (quota of 100 MW, maximum price – 12 euro cents/kWh) (according to the Solar Energy Association of Ukraine – 26 price bids from 24 companies). According to ExPro data, the first seven bids in the ranking (prices from 5.97 to 9.30 euro cents/kWh) together amount to 101.75 MW.

For the auction for SPPs without storage (quota of 50 MW, maximum price – 8 euro cents/kWh), 2 participants submitted 3 bids for 38.99 MW at prices of 7.30–7.99 euro cents/kWh, so the quota was not fully taken up.

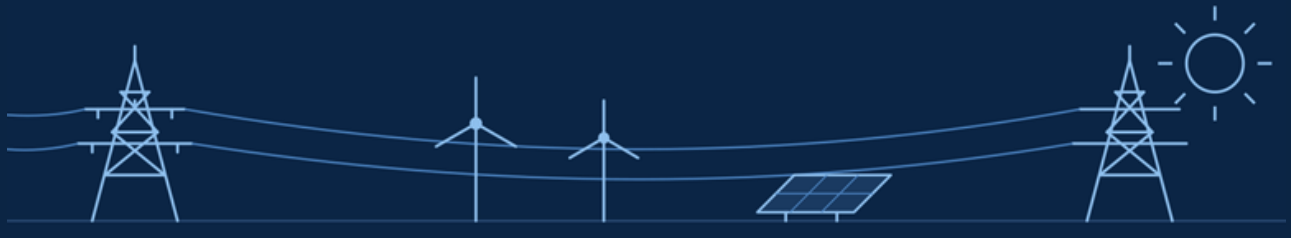


30 September 2026 – an auction for wind power plants was held (quota of 700 MW, maximum price – 8 euro cents/kWh): 9 participants submitted 93 bids for 1,218.1 MW at prices ranging from 2.98 to 7.59 euro cents/kWh – demand exceeded the quota by 518.1 MW. According to LIGA.net, the cut-off price was 7.40 euro cents and the weighted average price about 5.93 euro cents/kWh.

Bidding has been completed and the documents are being verified (for SPPs and SPPs with BESS – 28 September–9 October 2026; for wind power plants – 1–14 October 2026), after which the protocols will be drawn up.

7 September 2026 – NPC Ukrenergo, JSC Market Operator and Ukrainian Energy Exchange LLC (UEEX) signed memorandum of cooperation on coordinating preparations for coupling Ukraine's electricity market with the EU market (market coupling) – alignment of the contractual and organisational framework, technical integration of information systems, and interaction with NEURC, the Ministry of Energy, ENTSO-E, ACER and European nominated electricity market operators (NEMOs). The memoranda set out the areas of organisational and technical preparation for market coupling.

10 September 2026 – in June–August 2026, critical infrastructure enterprises received, through the Ukraine Energy Support Fund, 76 consignments of equipment worth EUR 74.79 million, financed by 15 donor countries and the EU (the largest contributions: the Netherlands – EUR 15.98 million, Germany – EUR 13.08 million, Italy – EUR 13.01 million, the United Kingdom – EUR 7.38 million, Sweden – EUR 6.63 million).



11 September 2026 – Canada will provide loan guarantees through the EBRD of up to CAD 757 million for emergency gas purchases and strategic fuel reserves ahead of the 2026/2027 heating season, and will contribute an additional CAD 10 million to the Ukraine Energy Support Fund (total contribution – CAD 100 million). Further partnership is envisaged between Energoatom and Canada's Cameco on long-term uranium supplies and conversion services until 2035.

14 September 2026 – more than 100 healthcare facilities in 23 regions of Ukraine are already generating electricity thanks to solar power plants installed under the "Ray of Hope" project (total capacity – over 9 MW) and to energy storage systems with a total capacity of about 10 MWh. The programme increases hospitals' autonomy during power outages and attacks on the power system. It is being implemented with the participation of the Ministry of Energy, the Ministry of Health, the Ukraine Energy Support Fund (with the support of the EU and partner countries) and the Energy Community Secretariat.

16 September 2026 – the Board of Directors of the DFC (U.S. International Development Finance Corporation) approved a loan to DTEK to finance an energy storage systems project with a capacity of 200 MW/400 MWh (maximum amount of debt financing – up to USD 185 million; DFC Public Information Summary). According to the company, this is the DFC's largest transaction in Ukraine's energy sector since the start of the full-scale invasion. The financing is intended to support the portfolio already built, including the repayment of bridge financing for construction and commissioning; approval does not mean that the entire maximum amount will be disbursed.

17 September 2026 – the fifth ministerial meeting of the G7+ Ukraine Energy Coordination Group was held in Paris. The Ministry of Energy reported that more than EUR 218 million has been received by the Ukraine Energy Support Fund since July, and about a further EUR 307 million has been announced. The need to raise at least a further EUR 400 million by the end of the year was emphasised. More than 10 GW of capacity is planned to be restored and built in 2026.

18 September 2026 – at the summit of the Carpathian Eight (C8) in Ivano-Frankivsk region, according to the President, more than 50 agreements worth over EUR 1 billion were prepared for signing. Separately, a joint investment portfolio of 95 projects worth over EUR 42.5 billion was presented (official statement), about half of which relates to energy (solar and wind generation, energy storage, new interconnectors, underground gas storage facilities); a Carpathian wind cluster with a capacity of 1.5 GW was announced.

19 September 2026 – Ukrhydroenergo expects the first EIB tranche of EUR 21 million, the allocation of which was announced on 17 September at the G7+ "Energy Ramstein" ministerial meeting. The tranche is provided under a EUR 120 million loan agreement signed in July 2025. The funds will go towards urgent repairs and modernisation of the Kaniv, Kremenchuk and Dnipro hydropower plants (HPPs).

21 September 2026 – the Ministry of Economy and Environment of Ukraine published a practical guide on energy supply for industrial parks, prepared in response to requests from initiators and management companies (in preparing the clarifications, the Ministry of Economy consulted the Ministry of Energy and NEURC). The document systematises the available models of energy supply for a park (own generation, electricity production for sale, active consumer status, energy storage) and grid connection issues. It notes separately that NEURC does not set special distribution tariffs for industrial parks, but **DSOs must take the needs of parks into account when preparing five-year distribution system development plans.**

The guide is a useful reference for developers of industrial sites at the project structuring stage – above all as regards combining own generation and BESS with contracted capacity and participating in the planning of DSO network development.

23 September 2026 – on the sidelines of the UN General Assembly, OpenAI announced that it was giving Ukraine access to its Daybreak cyber defence programme (OpenAI statement) to protect civilian critical infrastructure, including energy facilities, hospitals and telecommunications. The cooperation is being carried out together with the Ministry of Digital Transformation: Ukrainian specialists will receive AI tools for finding software vulnerabilities and speeding up their remediation.

23 September 2026 – the Government allocated more than UAH 157 million from the reserve fund to energy facilities in frontline regions: UAH 107 million for the restoration of an energy facility in Sumy region on which heat supply to almost 160,000 families depends, and UAH 50 million for additional protection of eight energy facilities in Kherson region (engineering structures, anti-drone protection).

29 September 2026 – the Ministry of Energy and UNDP are launching a facility (the Ukraine Energy Installation Facility) to accelerate the installation of energy equipment in communities. It will cover the preparation of projects and sites, installation of equipment, grid connection and commissioning. The initiative will be implemented over five years.



LEGAL & REGULATORY UPDATES

VRU Verkhovna Rada of Ukraine

15 September 2026

Draft Law No. 16000 **"On the State Budget of Ukraine for 2027"**, submitted by the Cabinet of Ministers of Ukraine, was registered in the Verkhovna Rada.

Impact

The draft **proposes to suspend for 2027** certain provisions of the Law "On Measures Aimed at Repaying the Debt Accumulated in the Wholesale Electricity Market" (clauses 1–3 of part 1 of Article 3, part 2 of Article 4, clause 3 of the Section "Final and Transitional Provisions"), as well as certain provisions of the Law "On Alternative Energy Sources" (part 3 of Article 8, part 31 of Article 9-6) insofar as they concern financing from the state and local budgets and the issue of green bonds (first reading – by 20 October 2026).

According to the Ministry of Energy, **the draft provides about UAH 100 billion for the energy sector in 2027, i**ncluding about UAH 60 billion for the protection and restoration of energy facilities after attacks and for the development of distributed gas-fired generation, and about UAH 700 million **for supplementary payments to energy workers engaged in emergency and restoration works.**



16 September 2026

The Verkhovna Rada adopted as a basis (at first reading) draft law No. 14282 "On Amendments to Certain Laws of Ukraine on Strengthening Guarantees for the Exercise of the Powers of the National Energy and Utilities Regulatory Commission" (Reg. No. 14282 of 8 December 2025).

Impact

The draft law **has the status of a European integration bill.** The next stage is preparation for the second reading in the Committee on Energy, Housing and Utilities Services. The document strengthens NEURC's institutional, functional and financial independence, provides for rotation of the Commission's membership (phased renewal over 12 months) and for the involvement of representatives of the European Commission and the Energy Community Secretariat in the competitive selection of its members.

21 September 2026

Two draft laws were registered in the Verkhovna Rada as alternatives to the Government's draft law No. 16033 "On Amendments to the Law of Ukraine 'On the Electricity Market' on Regulating Issues of Ensuring the Security of Electricity Supply". The alternatives propose different models of supervision.

No. 16033-1 (MP V. Hryb) **provides for the reorganisation of the State Inspectorate for Energy Supervision of Ukraine** (Derzhenerhonahliad) by merging it into the central executive authority responsible for industrial safety and occupational safety and health, which will become its legal successor; compliance orders already issued remain in force, and proceedings already opened are to be completed by the successor. It is proposed to rename the supervision "state supervision (control) over technical safety in the electricity sector" and to exclude from its scope matters within NEURC's competence and consumers not classified as a special group; entry into force is proposed six months after the day following the day of publication.

No. 16033-2 (MP O. Kucherenko) **does not provide for reorganisation**: it is proposed to exclude matters within NEURC's competence from the scope of energy supervision; entry into force is proposed from the day following the day of publication.

Both drafts prohibit a market participant from being held liable simultaneously by NEURC and by the supervisory authority for the same offence, and contain identical provisions on consumption schedule optimisation, demand response and the crisis coordinator. For generators, DSOs and large consumers, the model chosen will determine the list of inspections and the grounds for compliance orders and sanctions.

CMU Cabinet of Ministers of Ukraine

9 September 2026

The Cabinet of Ministers of Ukraine announced that, at the initiative of the Ministry of Energy, it had improved the **mechanism for distributing the funds** of heat supply and heat generating enterprises (CMU **Resolution No. 1110 of 9 September 2026**).

According to the Government, funds credited to the special accounts of these enterprises under the public service obligation (PSO) mechanism on the gas market are to be distributed as follows: 60% – for payments for natural gas; 5% – for repayment of debt for electricity and related services (only where there is such debt to the supplier of last resort, the transmission system operator (TSO) or a DSO); 35% – at the disposal of the enterprises for current payments.

The mechanism provides for the funds earmarked for electricity to be distributed proportionally among market participants – the supplier of last resort, the transmission system operator and distribution system operators – depending on the amount of debt owed to each of them.

Impact

The decision is aimed at reducing debt to the supplier of last resort and network operators and at improving payment discipline ahead of the 2026/2027 heating season. On 25 September 2026, NEURC published **draft amendments to the Procedure for Monitoring the Distribution and Use of these funds** (proposals – by 6 October 2026), which align the monitoring with the Government's changes.



17 September 2026

The Government **expanded the war risk insurance programme** for businesses and preferential lending for fuel infrastructure (**CMU Resolution No. 1157 of 17 September 2026** – on compensation for the value of property and for insurance premiums, and **Resolution No. 1156 of 15 September 2026** – on lending).

Kyiv and Kyiv region have been included in the high-risk areas. The maximum compensation of insurance premiums has been increased from UAH 3 million to UAH 5 million per year per enterprise; the list of property eligible for compensation has been extended to include fuel, vehicles for its transportation and storage, trucks, trailers and agricultural machinery; and compensation of insurance premiums has also been extended to leased property. The UAH 5 million limit applies specifically to compensation of insurance premiums; compensation for the value of property is subject to the territorial and other conditions of the Procedure.

Impact

By Resolution No. 1156, the Government also **expanded preferential lending for large projects in the fuel sector, logistics, trade and the processing industry,** including for the restoration of fuel and warehouse infrastructure: **the State compensates 5.5 percentage points of the base annual interest rate** (the base rate may not exceed 18% per annum; for example, at a base rate of 18% the borrower will pay 12.5% per annum), the maximum limit for a group of related parties is UAH 1 billion, and the minimum amount is UAH 100 million (UAH 30 million for projects in areas of possible and active hostilities).



23 September 2026

By Resolutions No. 1178 and No. 1179, the Government extended until 31 March 2027 the public service obligations (PSO) on the natural gas market – in respect of gas supply to household consumers, to heat supply enterprises at preferential prices, to gas distribution system operators, and for cogeneration in frontline territories.

Impact

According to the Government and the Ministry of Energy, **the gas price** for household consumers and for heat supply enterprises receiving gas under the PSO **will remain unchanged throughout the 2026/2027 autumn–winter period.**

24 September 2026

NEURC announced a public consultation on the draft CMU resolution it has prepared, "On Amending Resolution of the Cabinet of Ministers of Ukraine No. 303 of 13 March 2022". The aim is to align Resolution No. 303 on the termination of state supervision (control) measures under martial law with the NEURC Law, so that licensees cannot use it as a formal ground for challenging the Regulator's decisions. The discussion was scheduled for 1 October 2026 at 14:30. The draft has been agreed with the Ministry of Energy, the Antimonopoly Committee of Ukraine (AMCU), the Ministry of Finance, the Ministry of Economy and the Ministry of Digital Transformation.

Impact

if adopted, **it will be harder for licensees to challenge the Regulator's compliance orders** and sanctions by reference to the moratorium on inspections.

30 September 2026

The Ministry for Recovery, Infrastructure and Transport of Ukraine (Minrozvytku) published for electronic consultations a draft order of the Cabinet of Ministers approving an action plan for 2026–2027 aimed at the comprehensive settlement of accounts payable of heat supply, heat generating and heat transporting organisations (proposals – within 15 days of publication).

The tasks include compensation from the state budget in 2027 of debt arising from the difference in tariffs, deferral of payment of natural gas debts that arose from the difference in tariffs (this requires a separate law), improvement of two-part tariffs for heat energy, restructuring of consumers' debts for housing and utility services, and a **transition to economically justified tariffs once the moratorium on raising them is lifted.**

NEURC

National Energy and Utilities Regulatory Commission

9 September 2026

NEURC approved draft amendments to the Procedure for Submitting Information on Executed Business and Trading Transactions Related to Wholesale Energy Products (REMIT reporting), pursuant to Law No. 4834-IX: flexibility services and balancing capacity are added to the list of products, and references to “cross-border interconnections” are replaced with capacity “between bidding zones” (cross-zonal capacity).

17 September 2026

NEURC published for consultation draft amendments to the Transmission System Code approved at its meeting on 15 September 2026 (implementing the provisions of Law of Ukraine No. 4937-IX), which give effect to the right of a connection customer to independently select a contractor for construction and installation works and for start-up and commissioning works when connecting to the transmission system (Article 21 of the Law “On the Electricity Market” as amended by Law No. 4937-IX).

The draft provides for the TSO to publish qualification requirements for such a contractor, a procedure for the contractor to confirm compliance with those requirements, and a procedure for the TSO to conclude a works contract with the contractor chosen by the customer. Under the draft, the TSO **must publish the qualification requirements and the list of documents for confirming compliance within 3 working days of the amendments entering into force.**

15 September 2026

NEURC adopted Resolution No. 1521 on the commencement of an investigation into abuses in the wholesale energy market (within its powers to oversee wholesale market integrity and transparency – REMIT). The investigation concerns settlement hours of delivery days in April 2024. This signals tighter oversight.

24 September 2026

NEURC clarified the rules on settlements for electricity from household solar installations during night-time hours. At its meeting (a continuation of the meeting of 23 September 2026), by Resolution No. 1566 (published on 25 September 2026, in force from 26 September 2026), it approved amendments to the Retail Electricity Market Rules and to the Procedure for the Sale and Metering of Electricity Generated by Active Consumers and Settlements for It (as regards settlements with private households) – pursuant to Law of Ukraine No. 4937-IX of 15 July 2026.

For electricity **injected into the grid by a household's solar installation** from 23:00 to 04:00 (from 1 April to 31 October) and from 21:00 to 06:00 (from 1 November to 31 March), the price at which the universal service supplier (USS) purchases it will be the lower of two values – the "green" tariff set for that household or the day-ahead market (DAM) price for the relevant hour. The same approach applies to volumes exceeding the permitted hourly injection volume corresponding to the installed capacity of the installation. The Regulator emphasises that the amendments **do not provide for a general reduction of the "green" tariff for households.**

The decision also updates certain provisions on contractual relations in the retail market in connection with the repeal of the Economic (Commercial) Code of Ukraine. The draft underwent open discussion and was agreed with the Antimonopoly Committee of Ukraine.

Impact

For night-time injection and volumes above the hourly limit, **the purchase price can no longer exceed the DAM price for the relevant hour.** However, this rule does not apply to electricity that was previously stored and is injected from a BESS.



24 September 2026

NEURC, by Resolution No. 1564, set the regulatory fee rate for Q4 2026 at 0.065%.

By Resolution No. 1570 of 24 September 2026, the contribution to the special (earmarked) fund for covering the arbitration costs of JSC Guaranteed Buyer for Q4 2025 and Q2 2026 was approved – 1% of the payer's net income from operations at the facility (construction stage) for which an electricity sale and purchase agreement at the "green" tariff or an agreement on the provision of services under the market premium mechanism has been concluded.

By Order No. 147-r of 24 September 2026, the deadline by which the Guaranteed Buyer must remedy the breaches of the Licence Conditions under Order No. 170-r (to make full settlements under the "green" tariff for certain months of 2022–2024, under the market premium mechanism, and with NPC Ukrenergo for imbalances as at 31 December 2024) was moved from 1 October 2026 to 31 December 2026, and the reporting deadline from 15 October 2026 to 15 January 2027.

Impact

For RES producers – a contribution to the arbitration fund of 1% of net income for two quarters, and the postponement of the deadline by which **the regulator requires the Guaranteed Buyer to settle its historical debt.**



25 September 2026

The draft resolution "On the Approval of and Amendments to Certain NEURC Resolutions" was published; it concerns the improvement of the mechanisms for forming financial security and calculating the balancing neutrality charge on the natural gas market (amendments to the Gas Transmission System Code, the Gas Distribution Systems Code and the Standard Natural Gas Transmission Contract). The draft was approved on 24 September 2026. Comments are accepted until 5 October 2026 (inclusive).

Impact

The draft changes the basis for the minimum (non-reducible) balance of financial security: instead of the previous gas month – the maximum daily consumption over the last 12 months with final allocations. A 10-day coverage period is proposed for budget-funded institutions and state and municipal healthcare facilities (5 days for chemical and metallurgical enterprises and 3 days for other consumers remain unchanged).

Security will have to be provided no later than 3 hours before the deadline for submitting a nomination or 3 hours before a renomination is submitted and, as regards the register of consumers, by 15:00 Kyiv time on gas day D-1. **Where security is insufficient, the gas transmission system (GTS) operator will enter in the register information on the termination of current supplier status** after 3, 5 or 10 days depending on the consumer category (and, in the case of nominations, will also reject the nomination or renomination) and will notify the gas distribution system operator, except where consumers are automatically transferred to the supplier of last resort. It is proposed to remove the 10% adjustment from the security calculation.

It is proposed that the balancing neutrality charge take into account the GTS operator's costs of paying interest on a loan raised (where necessary) to pay network users (transmission service customers) the amounts due for the gas month, as well as the costs for the gas month of writing off bad debt for daily imbalances arising from 1 April 2025 onwards – according to defined criteria of irrecoverability (unsuccessful enforcement due to the debtor's insufficient assets, force majeure, bankruptcy or liquidation).

28 September 2026

The dashboard "Prices and Tariffs on the Retail Market" was published on NEURC's website. The tool covers data from Q3 2019 to Q1 2026 and makes it possible to track price and tariff trends for household and non-household consumers, compare indicators across the regions of Ukraine and individual service providers, and analyse the components of the final electricity price.

Impact

The dashboard covers historical data only up to Q1 2026: it is useful for retrospective analysis of prices and tariffs by region and service provider, but is no substitute for checking current commercial offers. For the separate draft on comparison tools, see below.

29 September 2026

NEURC set "green" tariffs effective from 1 October (Resolutions No. 1611, No. 1612 and No. 1613 of 29 September 2026) for three groups of producers: for business entities (together with premiums for the use of Ukrainian-made equipment), for consumers' generating installations, including those of energy cooperatives, with a capacity of up to 150 kW, and for private households.

Context

"Green" tariffs are set for the following quarter on the basis of the average official exchange rate of the hryvnia against the euro over the last 30 calendar days preceding the date of NEURC's last meeting in the current quarter.

The average rate for the period from 30 August 2026 to 28 September 2026 is UAH 5,153.9450 per EUR 100, which is higher than the official rate as at 1 January 2009 (UAH 1,085.5460 per EUR 100); **the Energy Market Department has therefore recalculated the "green" tariffs for electricity** generated by business entities, by consumers' generating installations, including those of energy cooperatives, and by generating installations of private households. Consequently, the hryvnia value of electricity sold to the grid at the "green" tariff depends on the exchange rate, **which reduces the risk of hryvnia depreciation for producers.**

30 September 2026

NEURC clarified the amendments to the Retail Electricity Market Rules approved by Resolution No. 1565 of 24 September 2026 (most provisions apply from 26 September; the new mechanism for the cost of services – from 1 October 2026).

A household consumer will not reimburse the costs of disconnection and reconnection if, at the time the warning was issued, the debt was less than half of the subsistence minimum for able-bodied persons – currently UAH 1,664. The same applies if, after adjustment based on actual meter readings, the debt at the time of disconnection proves to be below this threshold (in which case the costs are borne by the system operator), and if the consumer was disconnected in breach of the procedure.
From 1 October 2026, DSOs will determine the cost of these services under a single mechanism, within the maximum amount set by the Rules.

The indicative **average maximum cost of one service,** excluding VAT:

- remotely – UAH 170;
- at the meter or circuit breaker (up to 1 kV) – UAH 510;
- at the power line pole (up to 1 kV) – UAH 1,020.

The operator must choose the least complex and cheapest method of carrying out the works, where technically feasible and the necessary access is available. Once the reasons for disconnection have been eliminated and the necessary conditions fulfilled, electricity supply is restored within 3 working days in cities and 5 in rural areas.

Impact

Before the new mechanism was introduced, the cost of such works could be about UAH 5,000 for some system operators. The changes introduced by NEURC are **intended to make the procedures for disconnection and restoration of electricity supply more transparent,** harmonise approaches to determining the cost of the works and strengthen the protection of household consumers. For DSOs, this means having to recalculate and publish new cost calculations; the consumer must still pay the debt for electricity consumed.

NEURC adopted: 9–29 September 2026

Resolution No. 1493 of 9 September 2026 (in force from 11 September 2026) – for the duration of martial law, certain columns of the annual monitoring forms for generation, aggregation and BESS are not to be completed;

Resolution No. 1494 of 9 September 2026 – the TSO and DSOs must update the register of commercial metering points in the Datahub (location, generating units, installed capacity) by 1 October 2026;

Resolution No. 1538 of 17 September 2026 – amendments to the Transmission System Development Plan for 2026–2035 were approved;

Resolution No. 1573 of 29 September 2026 – amendments to the Temporary Procedure for the Procurement by NPC Ukrenergo of the Ancillary Service of Providing Replacement Reserves (tertiary control) were agreed;

Resolution No. 1591 of 29 September 2026 – the weighted average DAM price for 10–21 September 2026 (inclusive) is to be used for universal service prices for small non-household consumers for October 2026 and January 2027.

Impact

For generators, aggregators and BESS operators – **lighter annual reporting for the duration of martial law** (other reporting remains in place). For the TSO and DSOs – the update of the register of commercial metering points had to be completed by 1 October 2026. For USSs – the basis for calculating universal service prices for small non-household consumers.



NEURC also approved for consultation the following drafts:

Amendments to the Market Rules (approved on 15 September, published on 18 September, comments – by 30 September 2026) on monitoring the performance by ancillary services providers of their obligations, determining the volumes of balancing energy during activation of the automatic frequency restoration reserve (aFRR) and resolution of system constraints, and the TSO's taking into account of system constraints in system operators' networks when accepting balancing energy bids;

Amendments to Resolutions No. 282 and No. 450 on reporting (published on 28 September, proposals – by 12 October 2026) – submission of reports via an automated module, adjustment of TSO reports, data on intraday capacity allocation auctions, and BESS operations, including in aggregated groups;

Amendments to the Retail Electricity Market Rules on comparison tools for electricity suppliers' offers, pursuant to Law No. 4834-IX (approved on 29 September) – requirements for the independence of such tools, a NEURC "trust mark" in the form of a QR code, and free access for household and small non-household consumers whose forecast annual consumption does not exceed 100,000 kWh.

Impact

For generators and BESS operators, the most important is the draft amendments to the Market Rules – the conditions for monitoring the performance of ancillary services, determining the paid volumes of balancing energy and taking network constraints into account.
As at 30 September 2026, all three documents have the status of drafts.

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