

<b>The step under review</b>	<b>Complete transposition of the electricity integration package and continue its implementation, in line with Energy Community requirements (by June 2025).</b>
<b>Baseline</b>	Baseline (2024) is 0.
<b>Deadline of the step</b>	June/2025
<b>Actual results</b>	<p>With the establishment of the Ministry of Energy, Mining and Mineral Resources, the process of drafting the Energy Law, initially started by the Ministry of Economy, and continued in a transparent manner at the working group level. This process involved expert support and the participation of representatives from the Energy Regulatory Commission, MEPSO, ESM, EVN, TE-TO, MEMO, chambers of commerce, associations, and other institutions, i.e., stakeholders directly involved in implementing and regulating the sector covered by the law.</p> <p>The draft law was aligned with the Decision of the Ministerial Council of the Energy Community No. 2021/13/MC-EnC and harmonized with the following EU legislation:</p> <ul style="list-style-type: none"> <li>• Directive (EU) 2019/944 of the European Parliament and of the Council of 5 June 2019 on common rules for the internal market for electricity and amending Directive 2012/27/EU (CELEX No. 32019L0944),</li> <li>• Regulation (EU) 2019/943 on the internal market for electricity (CELEX No. 32019R0943),</li> <li>• Regulation (EU) 2017/1938 on measures to safeguard the security of gas supply (CELEX No. 32017R1938),</li> <li>• Regulation (EU) 2022/1032 amending Regulations (EU) 2017/1938 and (EC) No. 715/2009 regarding gas storage (CELEX No. 32022R1032),</li> <li>• Regulation (EU) No. 1227/2011 on wholesale energy market integrity and transparency (CELEX No. 32011R1227),</li> <li>• Regulation (EU) No. 2015/1222 establishing guidelines on capacity allocation and congestion management (CELEX No. 32015R1222),</li> <li>• Regulation 941/2019 on risk preparedness in the electricity sector.</li> </ul> <p>The working group held 13 meetings, in the period of the beginning of September up to beginning of October. Attendance records were maintained for all meetings during which members were invited to submit proposals, comments, or suggestions, either orally or in writing. The Ministry of Energy, Mining and Mineral Resources led the meetings, reviewed each comment individually, and incorporated relevant feedback into the draft law while ensuring compliance with obligations under the Energy Community Treaty.</p>

Attendance records were maintained for all meetings, ( the evidence are the list down below from point 33 to 45). On October 25, 2024, the Ministry uploaded the new draft law and the Draft Regulatory Impact Assessment Report to the Single National Register of Regulations. [Уредување на прописите на единствениот национален регистар на прописи на Република Македонија](#)

In addition to publishing, it in the National Register, the draft law was submitted to the Energy Community, relevant institutions, chambers, and other stakeholders for feedback.

The Ministry reviewed all comments received via ENER and written submissions, appropriately incorporated them into the draft, and prepared concordance tables aligning the draft law with the EU electricity market integration package.

The draft Energy Law, along with five EU-MK concordance tables, one MK-EU table, a statement of compliance with EU legislation, and the Draft Regulatory Impact Assessment Report, was uploaded to the e-Government portal on January 24, 2025. This initiated the harmonization process with relevant institutions, including the Ministry of European Affairs. The Ministry also published this document package on its website under the Reform Agenda, Market Reforms section. [Реформска агенда - Реформска агенда - Документи - Министерство за енергетика, рударство и минерални сировини - Република Северна Македонија](#)

During this process, 13 opinions were received and appropriately addressed. The Government adopted the draft law on March 18, 2025, along with the concordance tables, the compliance statement, and the Draft Regulatory Impact Assessment Report. ( the evidence are the list down below from point 9 to 22).

The legislative procedure in the Assembly of the Republic of North Macedonia began on April 2, 2025. During the parliamentary process, 74 amendments were submitted, 64 of which were adopted, while the remaining 10 were rejected. [Собрание на Република Северна Македонија - Детали на материјал.](#)

Technical assistance for translating the draft law was provided through the Ministry of European Affairs. After completing the English translation of the draft Energy Law, the Ministry began translating the concordance tables. On April 25, 2025, via letter No. 08-1974/1, the Ministry sent the draft law to the Ministry of European Affairs for submission to the appropriate directorate of the European Commission. Due to amendments introduced during the second parliamentary reading, the translated draft law and the concordance had to be updated accordingly.

At the end of June 2025, the Ministry of European Affairs submitted to the European Commission the English-translated Energy Law and the updated concordance tables, reflecting the adopted amendments.

The new Energy Law entered into force on May 29, 2025(“Official Gazette of the Republic of North Macedonia” No. 101/25).

Electricity Integration Package's transposition into the new Energy Law (\*) creates a legal prerequisite for smooth and active inclusion of energy systems and electricity markets as an integral part of the regional and European Union's electricity markets. For the purpose of achieving smooth and active integration of energy systems and electricity markets into the regional and internal markets of the European Union, new rights, obligations and responsibilities of the competent state authorities, transmission system operator, electricity market operator for the organized electricity market not only in terms of implementation, but also in terms of active involvement in the adoption of common rules regulating all aspects of the operation of the regional energy markets.

Most important solutions for establishment of regional electricity market are provided in the new Energy Law are:

1. Reliability criterion is introduced by the Ministry in accordance with the methodology developed by ENTSO-E and approved by ACER, and the calculation shall take into account the values of lost load and the cost of building new capacities for a certain time interval at the least, with the criterion being expressed by the parameters "Expected Energy Not Served" and "Loss of Load Expectation";

2. Principles for the capacity mechanism, principles for the creation of the capacity mechanism and the rules for cross-border participation in the capacity mechanism have been elaborated in detail;

3. Provisions for energy storage as an energy activity are foreseen, i.e. the issues of who, when and how can use a storage facility are more precisely regulated, a prohibition for the transmission system operator and the distribution system operator to own storage facilities and to use storage facilities for commercial purposes, except as a technologically integrated part of the system, has been established, and an exception to the prohibition for them has been developed;

4. The rights and duties of the electricity transmission system operator have been expanded in the domain of managing the capacity of interconnections and congestion, cross-border cooperation with system operators and Regional Coordination Centres, market integration, data exchange and interoperability, system security and risk management, and the cost-effectiveness of system operation and development;

5. Coupling of markets and cooperation in the region for coordinated capacity calculation has been developed, new provisions have been prescribed, which also refer to: adoption and application of rules and methodologies for coordinated calculation of cross-zonal transmission capacities in the coordinated calculation region and market methods for allocating cross-zonal

capacities, for cooperation in the region for coordinated system management and transfer of rules and methodologies from the ENTSO-E network codes and methodologies for coordinated management of the electricity transmission system, for exchange and coordinated access to common resources for system balancing and system defence and restoration of its functions in the event of an outage;

6. Use of energy storage, energy efficiency mechanisms, demand-side management and aggregation, priority dispatching are regulated;

7. The electricity transmission system operator is envisaged to prepare a ten-year transmission system development plan every two years, upon consultation with the affected market participants, users of the transmission system and customers;

8. Congestion management in the Bidding Zone has been regulated, which also regulates the revision of the Zone configuration in cooperation with the operators from the Region, as well as the treatment of system congestion, as well as the management of system congestion in the Bidding Zone;

9. Rules for allocation of inter-zonal capacities in the region and the management of physical congestion, as well as the procedure for allocation of inter-zonal transmission capacities with allocation in different time frames have also been covered;

10. Harmonized calculation of congestion charges through ACER methodology, which also regulates the procedure for use and purpose of congestion revenues;

11. In terms of international cooperation, the provisions establish the regions of cooperation, i.e. the region of coordinated capacity calculation and the region of coordinated management of electricity transmission systems. The obligation for coordinated calculation of transmission capacities at the borders of the Bidding Zone through the common mechanism has also been regulated;

12. The electricity market has been regulated in more detail by introducing principles regarding the operation of electricity markets and adding new market participants such as aggregators;

13. Obligations of the Operator of the organised electricity market arising out of the Regulation (EU) No. 2015/1222 of the European Commission of 24 July 2015 establishing a guideline on capacity allocation and congestion management (CELEX No. 32015R1222) or the CACM Regulation have been transposed accordingly in the articles of the law;

14. It has also been made possible for operators of organized markets nominated in other countries to perform day-ahead and intraday market services outside the countries where they are nominated;

15. Revocation of the organized market operator's license has been regulated;

16. The balancing market has been established as a separate market with provisions for its operation, and long-term markets have been added as a new type of market;

17. For the part of integration of electromobility into the electrical grid, the integration of electric vehicle chargers into the electrical distribution system has been enabled;

18. New opportunities for customers have been provided, including:

1. entering into more than one electricity supply contract at the same time, provided that there are separate connection points and metering devices.
2. entering into a dynamic electricity supply contract and
3. entering into aggregation contract;

19. Customers are enabled to produce, store and sell electricity, i.e. to participate in the electricity market directly or through an aggregator, as well as to participate in mechanisms for ensuring system flexibility and energy efficiency schemes;

20. Civil energy community has been introduced as a legal entity registered in the register of other legal entities, in which members or owners of shares as natural persons, local self-government units or legal entities in accordance with the Company Law sharing a common connection to the electricity distribution

21. Provisions for early warning and declaration of an electricity crisis, cooperation with the Contracting Parties to the Energy Community and the European Union's Member States and ex-post evaluation of the electricity crisis have been entered, and a basis for adopting a Regulation on Preparedness for Dealing with Risk and Electricity Crisis has been provided.

22. New procedure for appointing president and members of the Energy Regulatory Commission has been introduced, which shall be implemented through the Assembly's Committee on Election and Appointment Issues, thus replacing the current model by a new one that is expected to enable greater efficiency and independence. This section further specifies the provisions

regarding the integrity and conflict of interest of the Energy Regulatory Commission's members;

23. The procedure for assessing risks to the security of electricity supply, i.e. short-term and seasonal adequacy assessment in the event of an electricity crisis have also been regulated, as well as the adoption of the preparedness plan for dealing with risks against an electricity crisis and its content, or more specifically, provisions for adequacy assessment have been added, whereby the transmission system operator shall, by applying the Short-term and Seasonal Adequacy Assessments Methodology prepared by ENTSO-E and approved by ACER, and the short-term assessment prepared by the Regional Coordination Centre on the basis of the seasonal assessment of resource adequacy and in coordination with the Contracting Parties to the Energy Community or the European Union's Member States, prepare a short-term assessment of resource adequacy in the course of one month, one week and a day-ahead, as well as provisions for the plan for implementing measures to eliminate identified deficiencies, which upon a proposal by the Energy Regulatory Commission and the transmission system operator shall be adopted and published by the Ministry;

24. Protection of the energy customers', in particular vulnerable customers' rights; and

25. New energy policy is being established which, through a strategic planning process, will enable reliable, safe and quality supply of customers with all types of energy, stability, competitiveness and economic operability of the energy sector, efficient provision of services and protection and promotion of customer rights, reduction of energy poverty and protection of vulnerable customers, integration of energy markets in regional and international markets, use of energy sources in a manner ensuring sustainable energy development, promotion of energy efficiency, reduction of the use of fossil fuels for energy production, protection of the public health, the environment and mitigation of climate change against harmful impacts arising out of the performance of energy activities, fulfilment of obligations arising out of ratified international treaties and other objectives.

Transitional provisions in Article 307 came into effect, outlining the procedure for appointing the nominated electricity market operator (NEMO) in the Republic of North Macedonia. This obligation arises from the transposition of the EU's "Clean Energy" Package.

According to these provisions, within eight days from the law's entry into force, the Energy Regulatory Commission must determine compliance with the conditions outlined in the Regulation on the operation of the organized electricity market operator and the necessary technical, staffing, and financial requirements (\*) ("Official Gazette of the Republic of North Macedonia" No. 227/19). The Commission must then submit an opinion and a proposal to the Government for a decision on appointing the entity managing the organized electricity market (as designated in the Government's Decision published in

Official Gazette of the Republic of North Macedonia” No. 218/20) as the nominated electricity market operator – NEMO

By Decision No. 44-8155/1 dated September 9, 2020, (“Official Gazette of the Republic of North Macedonia” No. 218/20), the Government, appointed the National Electricity Market Operator – MEMO LLC Skopje - company registration number 7309724, with headquarters at Maksim Gorki Street No. 4, Centre, Skopje, as the organized electricity market operator. ( the evidence are the list down below point 24,27,28 and 32).

On June 5, 2025, the Government adopted the Decision appointing the organized electricity market operator as the nominated electricity market operator – NEMO in the Republic of North Macedonia. (“Official Gazette of the Republic of North Macedonia” No.114/25). On July 7, 2025, the Ministry of Energy, Mining and Mineral Resources forwarded the same documents,(Energy Law, Decision for NEMO) ( the documents are the listed down below from point 1 to 8). The document in point 1 include visible changes resulting from the accepted amendments to the Energy Community Secretariat for verification.

According to the *Regional ATC Market Coupling Gap Analysis for Albania, Kosovo, and North Macedonia*, prepared by USAID, the implementation of market coupling requires the adoption of 26 secondary legal acts. These include national (approved by the Energy Regulatory Commission), regional acts (approved by relevant regional and regulatory bodies), and some are pan-European (approved by ACER).

It is estimated that the Transmission System Operator will prepare and submit for approval all Terms, Conditions, or Methodologies) TCMs) by the end of 2025 or by March 2026. This would create the conditions for day-ahead market coupling, which could be technically feasible by the end of 2026.

Meanwhile, MEMO has launched an initiative to couple the Day-Ahead Market with neighbouring countries. Regional cooperation has been established through the SEE Market Coupling Initiative, involving TSO and NEMOs from North Macedonia, Greece, Albania and Kosovo. In November 2023, these parties signed a Memorandum of Understanding to advance the project. The initiative aims to align with the rules and processes of the Italian Border Working Table (IBWT), and a request for IBWT membership has been submitted. The coupling project must comply with Single Day-Ahead Coupling (SDAC) procedures. Final IBWT documentation has now been delivered and MEMO, following coordination with the Energy Regulatory Commission, is in the process of aligning with. This lays the foundation for establishing Local Implementation Projects (LIPs), following the certification of the EIP and approval of MCO IP by ACER.

Within nine months, MEMO is expected to adopt Rules for registration for participation in the electricity market and regulation of the market of bilateral contracts. Additionally, JSC MEPSO is participating in the Joint Declaration on

	Regional Coordination – South-East Europe Energy Community TSO's signed by all ENSO-E TSO and continues to work on fulfilling obligations under the declaration.
<b>Evidence provided</b>	<ol style="list-style-type: none"> <li>1. Energy Law in official Gazette - <a href="#">3a анек\Energy Law in official Gazette.pdf</a></li> <li>2. Energy Law - <a href="#">3a анек\Energy Law.pdf</a></li> <li>3. Concordance table 943 - <a href="#">3a анек\CT 943 Regulation.pdf</a></li> <li>4. Concordance table 944 - <a href="#">3a анек\CT 944 Regulation.pdf</a></li> <li>5. Concordance table 1938 1032 - <a href="#">3a анек\CT 1938 1032 Regulation.pdf</a></li> <li>6. Concordance table 2019 941 - <a href="#">3a анек\CT 2019 941 Regulation.pdf</a></li> <li>7. Concordance table CACM - <a href="#">3a анек\CT CACM Regulation.pdf</a></li> <li>8. Concordance table REMIT - <a href="#">3a анек\CT REMIT Regulation.pdf</a></li> <li>9. Opinion from the Ministry of Social Policy, Demography and Youth - <a href="#">1. Opinion from the Ministry of Social Policy, Demography and Youth.pdf</a></li> <li>10. Opinion for the Commission for Protection of Competition - <a href="#">2. Opinion for the Commission for Protection of Competition.pdf</a></li> <li>11. Opinion from the Ministry of Agriculture, Forestry and Water Economy – Minister's Cabinet - <a href="#">3. Opinion from the Ministry of Agriculture, Forestry and Water Economy – Minister's Cabinet.pdf</a></li> <li>12. Opinion from the Ministry of Agriculture, Forestry and Water Economy – Sector for Normative and Legal Affairs <a href="#">4. Opinion from the Ministry of Agriculture, Forestry and Water Economy – Sector for Normative and Legal Affairs.pdf</a></li> <li>13. Opinion from the Ministry of Digital Transformation - <a href="#">5. Opinion from the Ministry of Digital Transformation.pdf</a></li> <li>14. Opinion from the Ministry of Environment and Physical Planning - <a href="#">6. Opinion from the Ministry of Environment and Physical Planning.pdf</a></li> <li>15. Opinion from the Ministry of European Affairs - <a href="#">7. Opinion from the Ministry of European Affairs.pdf</a></li> <li>16. Opinion from the Ministry of Finance - <a href="#">8. Opinion from the Ministry of Finance.pdf</a></li> <li>17. Opinion from the Ministry of Finance_1 - <a href="#">9. Opinion from the Ministry of Finance 1.pdf</a></li> <li>18. Opinion from the Ministry of Justice - <a href="#">10. Opinion from the Ministry of Justice.pdf</a></li> <li>19. Opinion from the Ministry of Public Administration - <a href="#">11. Opinion from the Ministry of Public Administration.pdf</a></li> <li>20. Opinion of the Secretariat for Legislation on the Statement of Compliance with the Concordance Table of the Regulation - <a href="#">12. Opinion of the Secretariat for Legislation on the Statement of Compliance with the Concordance Table of the Regulation.pdf</a></li> <li>21. Opinion from the Secretariat for Legislation - <a href="#">12. Opinion of the Secretariat for Legislation on the Statement of Compliance with the Concordance Table of the Regulation.pdf</a></li> <li>22. Opinion from the Ministry of Local Self-Government - <a href="#">14. Opinion from the Ministry of Local Self-Government.pdf</a></li> </ol>

	<p>23. Excerpt from the Draft Minutes of the Sixty-First Session of the Government of the Republic of North Macedonia held on 18 March 2025 - <a href="#">15. Excerpt from the Draft Minutes of the Sixty-First Session of the Government of the Republic of North Macedonia held on 18 March 2025.pdf</a></p> <p>24. Decision NEMO - <a href="#">Decision NEMO.pdf</a></p> <p>25. Submission of materials for verification and opinion english version - <a href="#">Submission of materials for verification and opinion english version.pdf</a></p> <p>26. Submission of materials for verification and opinion macedonian version - <a href="#">Submission of materials for verification and opinion macedonian version.pdf</a></p> <p>27. ERC OPINION AND PROPOSAL for the appointment of the operator of the organized electricity market - <a href="#">ERC OPINION AND PROPOSAL for the appointment of the operator of the organized electricity market.pdf</a></p> <p>28. ERC Proposal to the Government for the Appointment of NEMO - <a href="#">ERC Proposal to the Government for the Appointment of NEMO.pdf</a></p> <p>29. JUST AND SECURE ENERGY TRANSITION (JSET) PROJECT - <a href="#">JUST AND SECURE ENERGY TRANSITION (JSET) PROJECT.pdf</a></p> <p>30. Report on regulator impact assessment - <a href="#">Report on regulator impact assessment.pdf</a></p> <p>31. Statement of Compliance of the Regulation with the Legislation of the European Union with a Correspondence Table - <a href="#">Statement of Compliance of the Regulation with the Legislation of the European Union with a Correspondence Table.pdf</a></p> <p>32. Decision NEMO Official Gazette - <a href="#">Decision NEMO Official Gazette.pdf</a></p> <p>33. Constitutive first meeting - <a href="#">Attendance list\Constitutive first meeting.pdf</a></p> <p>34. First meeting - <a href="#">Attendance list\First meeting.pdf</a></p> <p>35. Second meeting - <a href="#">Attendance list\second meeting.pdf</a></p> <p>36. Third meeting - <a href="#">Attendance list\third meeting.pdf</a></p> <p>37. Fourth meeting - <a href="#">Attendance list\fourth meeting.pdf</a></p> <p>38. Fifth meeting - <a href="#">Attendance list\fifth meeting.pdf</a></p> <p>39. Sixth meeting - <a href="#">Attendance list\sixth meeting.pdf</a></p> <p>40. Seventh meeting - <a href="#">Attendance list\seventh meeting.pdf</a></p> <p>41. Eighth meeting - <a href="#">Attendance list\eighth meeting.pdf</a></p> <p>42. Ninth meeting - <a href="#">Attendance list\ninth meeting.pdf</a></p> <p>43. Tenth meeting - <a href="#">Attendance list\tenth meeting.pdf</a></p> <p>44. Eleventh meeting - <a href="#">Attendance list\eleventh meeting.pdf</a></p> <p>45. Twelfth meeting - <a href="#">Attendance list\twelfth meeting.pdf</a></p>
<p><b>Checks performed in the verification of</b></p>	<p>During the drafting of the Energy Law Proposal, a total of six concordance tables were prepared. In this phase, the following legal acts were of particularly importance:</p>

<p><b>the step and related findings</b></p>	<ul style="list-style-type: none"> <li>• Directive 2012/27/EU (CELEX No. 32019L0944),</li> <li>• Regulation (EU) 2019/943 (CELEX No. 32019R0943), and</li> <li>• Regulation (EU) No. 2015/1222 (CELEX No. 32015R1222).</li> </ul> <p>To ensure transparency in the legislative process, a dedicated working group was established, and 13 meetings were held. The public was informed about the content of the draft law through the Single National Portal for the Publication of Regulations.</p> <p>During the law’s preparation, stakeholders, including chambers of commerce, non-governmental organizations, and relevant state institutions, were given the opportunity to submit comments. In line with national procedures for public participation in the legislative process, a Draft Regulatory Impact Assessment was prepared, followed by a final assessment during the Government’s adoption procedure.</p> <p>The national procedures for preparing the concordance tables and the statement of compliance with EU legislation were appropriately followed. For the purposes of the Reform Agenda, a translation of the concordance tables was also prepared.</p>
<p><b>Compliance with general principles and DNSH principle</b></p>	<p>The implementation of the steps does not contravene the general principles outlined in Article 4 and 11(4) of Regulation (EU) 2024/1449 and Article 3 of the Facility Agreement.</p> <p>The implementation of the steps does not contravene the ‘Do No Significant Harm’ principle (DNSH).</p>
<p><b>Double funding</b></p>	<p>Contributions from third parties were not reported in support of the achievement of this step.</p>
<p><b>Clear conclusion on the achievement of the step</b></p>	<p>Fully achieved</p>

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