



Poláček & Partners

# Monitoring of Energy Legislation

**NOVEMBER 2025**

The most important legislative changes  
and interesting news

## MONITORING / November 2025

See the most important news in the field of energy for the month of November 2025.

**The government** has approved regulations on targeted energy assistance and maximum prices of electricity, gas, and heat for 2026, which define in detail the compensation mechanism, price caps, and new obligations for suppliers.

**RONI** has adjusted the price regulation, which will directly affect the level of regulated prices for next year. **SEPS** has announced new system services tariffs, which will change at different rates across consumer groups.

The **Ministry of Economy** has again provided information on the new high-efficiency CHP support scheme, aimed at modernising the heating sector.

**OKTE** will have a new Operating Code from January 2026, introducing in particular changes to the provision of billing data.

Read more about these and many other interesting news in our **monitoring for the month of November 2025**.

We wish you a pleasant reading!

**Pavol Poláček**, Managing Partner

## 1. WHAT HAS CHANGED?

ELECTRIC ENERGY AND GAS INDUSTRY	
Act no. <b>309/2009</b> Coll. on the support of RES	no
Act no. <b>250/2012</b> Coll. on Regulation	no
Act no. <b>251/2012</b> Coll. on Energy	no
Act no. <b>321/2014</b> Coll. on energy efficiency	no
Act no. <b>609/2007</b> Coll. on excise duty on electricity, coal and natural gas	no
Act no. <b>555/2005</b> Coll. on energy efficiency of buildings	no
Act no. <b>260/2025</b> Coll on targeted energy aid	no
RONI Decree no. <b>490/2009</b> Coll., laying down details on the support of RES	no
RONI Decree no. <b>92/2023</b> Coll., laying down the conditions of the tender procedure for the provision of electricity storage facility services	no
RONI Decree no. <b>207/2023</b> Coll., establishing the rules for the functioning of the internal electricity market	no
RONI Decree no. <b>208/2023</b> Coll., establishing the rules for the functioning of the internal natural gas market	no
RONI Decree no. <b>230/2023</b> Coll., establishing the content requirements of the distribution system development plan	no
RONI Decree no. <b>285/2012</b> Coll., establishing price regulation for the supply of natural gas to small businesses	no
RONI Decree no. <b>147/2024</b> Coll., establishing price regulation of regulated activities in the gas industry	no
RONI Decree no. <b>154/2024</b> Coll., establishing price regulation in electric energy industry and some conditions for the performance of selected regulated activities in the electric energy industry	yes
RONI Decree no. <b>278/2012</b> Coll., establishing quality standards for gas storage, gas transportation, gas distribution and gas supply	no
RONI Decree no. <b>236/2016</b> Coll., establishing quality standards for electricity transmission, electricity distribution and electricity supply	no
RONI Decree no. <b>284/2012</b> Coll. on the rules for the sale of electricity in the form of auctions	no
Decree of the Ministry of Economy of the Slovak Republic no. <b>599/2009</b> Coll., implementing certain provisions of the Act on the support of RES	no
Decree of the Ministry of Economy of the Slovak Republic no. <b>270/2012</b> Coll. on professional competence for carrying out business activities in the energy sector	no
Decree of the Ministry of Economy of the Slovak Republic no. <b>416/2012</b> Coll., establishing the details of the procedure for applying restrictive measures in a state of emergency and measures aimed at eliminating the state of emergency in the electric energy industry	no
Decree of the Ministry of Economy of the Slovak Republic no. <b>106/2019</b> Coll., establishing the list of authorized industries, the scope and structure of the administration and the method of providing compensation to entrepreneurs	no
Decree of the Ministry of Economy of the Slovak Republic no. <b>202/2019</b> Coll., establishing the conditions for participation in the auction for the selection of the	no

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electricity purchaser and determining the amount of the electricity purchaser's remuneration	
Decree of the Ministry of the Environment of the Slovak Republic no. <b>354/2025</b> Coll. on criteria for the development of wind energy	<b>yes</b>

THERMAL ENERGY	
Act no. <b>657/2004</b> Coll., on thermal energy	no
RONI Decree no. <b>312/2022</b> Coll., establishing price regulation in thermal energy	no
RONI Decree no. <b>277/2012</b> Coll., establishing heat supply quality standards	no
RONI Decree no. <b>328/2005</b> Coll., determining the method of verifying the economic efficiency of the operation of the heating facilities system, the energy efficiency indicators of heat production and heat distribution facilities, the normative indicators of heat consumption, the range of economically justified costs for the verification of the economic efficiency of the operation of the heating facilities system and the method of payment of these costs	no
RONI Decree no. <b>146/2024</b> Coll., establishing the range of economically justified costs caused by disconnection of the consumer from the system of the supplier's heating facilities and the method of their calculation	no
RONI Decree no. <b>167/2025</b> Coll., establishing the templates of applications for business activities in heat energy	no
Decree of the Ministry of Economy of the Slovak Republic no. <b>151/2005</b> Coll., establishing the procedure for preventing the occurrence and removing the consequences of a state of emergency in the thermal energy industry	no
Decree of the Ministry of Economy of the Slovak Republic no. <b>152/2005</b> Coll. on the specified time and on the specified quality of heat supply for the end consumer	no
Decree of the Ministry of Economy of the Slovak Republic no. <b>15/2016</b> Coll., establishing the method of calculating the annual heat production in the production of electricity	no
Decree of the Ministry of Economy of the Slovak Republic no. <b>503/2022</b> Coll., establishing the temperature of hot water at the take-off point and the rules for budgeting costs for the amount of heat supplied in hot water, costs for the amount of heat supplied for heating, costs for the amount of heat supplied or the amount of heat produced in a decentralized heat source and economically justified costs for heat produced in a decentralized heat source	no
Decree of the Ministry of Economy of the Slovak Republic no. <b>308/2016</b> Coll., establishing the procedure for calculating the primary energy factor of the centralized heat supply system	no
Decree of the Ministry of Economy of the Slovak Republic no. <b>14/2016</b> Coll., establishing technical requirements for thermal insulation of heat and hot water distribution lines	no

**Note:** In our monitoring of energy legislation, we monitor for you the changes to the above-mentioned legal regulations, which were published in the Collection of Laws of the Slovak Republic last month.

## 2. YOU MIGHT BE INTERESTED

### 2.1 APPROVED LEGISLATION IN THE ENERGY SECTOR

#### ■ Decree on Criteria for the Development of Wind Energy

**5 December 2025** – A decree of the MoEN SR, **Decree No. 354/2025 Coll. on Criteria for the Development of Wind Energy**, has been published in the Collection of Laws and enters into force on **9 December 2025**.

The document introduces a new regime for defining so-called **acceleration zones** — areas that meet specific technical, environmental, and spatial criteria for the construction of wind turbines. The decree sets out exact threshold parameters and procedures for assessing a given location.

This means that every new wind energy project must now be planned in accordance with these criteria. For investors, project designers, and municipalities, it is essential to verify whether the selected site complies; otherwise, the project cannot be implemented, and the permitting authority may refuse approval.

The full text of the decree is available [HERE](#).

#### ■ Targeted Energy Assistance 2026 and Price Compensation – Government Approves the Decrees

**3 December 2025** – The Government of the Slovak Republic has approved the long-awaited government decrees introducing the previously announced energy assistance scheme. These include the following decrees:

- (i) No. **353/2025 Coll.**, which implement the provisions of Act No. 260/2025 Coll. on Targeted Energy Assistance, entering into force on **8 December 2025**, and;
- (ii) No. **359/2025 Coll.**, which establishes the maximum price for the regulated portion of electricity supply for selected vulnerable electricity customers, the maximum price for the regulated portion of gas supply for selected vulnerable gas customers, and the maximum price for regulated heat supply for selected end-users of heat for the year 2026, as well as the conditions for their application, entering into force on **1 January 2026**.

These are essential documents that determine the maximum commodity prices and further specify the mechanism for providing energy assistance, the calculation of eligibility (bonity), the rules for assigning consumption points, and definitively set the form and scope of support for electricity, gas, and heat. Below, we present the key points of the decrees, clearly structured by commodity:

#### A. Electricity

For electricity, the support mechanism takes the form of a “price intervention”, under which suppliers will be required to charge households covered by the energy

assistance scheme a price lower than the one set by the Regulatory Office for Network Industries (“**RONI**”). A similar mechanism was applied in previous years.

Specifically, the regulated electricity price for 2026, determined by RONI’s decision, must always be reduced by approximately **31,24/MWh EUR** (excluding VAT) compared to the maximum price set by RONI. This reduction applies to all tariffs and bands, including dynamic pricing. A monthly fee of 1.50 per EUR delivery point (excluding VAT) is also introduced.

Suppliers are required to provide regular data outputs and must account for possible retroactive corrections if the Ministry of Economy of the Slovak Republic (“**MoE SR**”) identifies an incorrect assignment of a delivery point.

## B. Gas

Similarly to electricity, the support mechanism for gas is based on price capping. Suppliers must offer households covered by the energy assistance scheme a **compensated price** instead of the regulated price set by the RONI.

According to the government decree, the commodity component of the gas price for 2026 is to be maintained at the 2025 level by applying a formula *based on  $1.15 \times$  the maximum tariff rate from 2022*. This applies to tariffs D1–D8. A monthly fee of 1.50 EUR per delivery point (excluding VAT) also applies. The supplier adds distribution and transmission charges to this price, which are regulated separately.

Households will therefore receive gas at a lower (capped) price, but the total invoice amount may vary depending on regulated distribution and transmission charges. The system for reimbursing the difference between maximum prices and compensated prices will operate through an advance (prepayment) mechanism throughout the year. Final settlement must be carried out within 24 months after the end of the supply year. If the final difference is positive, the supplier must return the relevant amounts; if negative, the supplier is entitled to reimbursement. MoE SR will specify the procedures and deadlines in a separate guideline.

## C. Heat

In the case of heat, the support will not take the form of a reduced price as it does for electricity or gas. Instead, a system of energy vouchers will be introduced for households whose heat costs increase significantly. The minimum value of a single voucher is 5 EUR. It is paid out in cash via a postal money order. If the calculated amount is less than 10 EUR, the voucher will not be paid.

Vouchers will be paid twice a year, typically in January and July, each time in half of the total amount. The support is designed to be individualised: the value of an energy voucher will depend on the location, the heat price in the relevant region, the consumption of the apartment building (or house), the apartment’s floor area share, the number of persons, and other variables.

The calculation is based on *the difference between the maximum heat price in year  $t$  and year  $t-2$ , multiplied by the household’s share of heat consumption* (two coefficients

apply: common-area consumption + number of persons). If data are not available, a reference value of 199 EUR /MWh is used.

The full texts of the approved government decrees are available [HERE](#) and [HERE](#).

## ■ RONI has amended the decree on price regulation for 2026

**27 November 2025** – RONI has amended Decree No. 154/2024 Coll., which regulates price-setting in the electricity sector. The draft amendment was submitted to the Economic and Social Council of the Slovak Republic on 19 November 2025.

The amendment responds to the significant increase in wholesale electricity prices in 2024–2025 and has a direct impact on the calculation of **the maximum electricity price for households in 2026**. The key change is the adjustment of the reference electricity price used by RONI in regulated pricing formulas. The current value of **61 EUR/MWh has been increased to 72,70 EUR/MWh**. At the same time, the *kckt* coefficient, which reflects market price developments, has been updated — for 2026 its value is **1.429719**, which will substantially affect the calculation of the final price. The adopted amendment therefore means that the price cap for the electricity commodity for households in 2026 will be higher. The change entered into force on the day of its publication, **27 November 2025**.

More information on the legislative proposal and the process is available [HERE](#). The adopted decree amendment is available [HERE](#).

## 2.2 POLÁČEK & PARTNERS

### ■ P&P: What questions must a Due Diligence Report answer?

**7 November 2025** – In our latest article “*Due Diligence (DD) Report – What Questions Should It Answer?*”, colleagues Matúš Hanušovský and Patrik Repka explain that legal due diligence is not just a formal step in an acquisition or investor entry, but a crucial process that uncovers hidden risks and future liabilities of the target company.

The article highlights that a DD report must provide clear answers to questions such as **what assets you are acquiring, what legal obligations you are assuming, and whether there are risks** such as invalid contracts, incomplete corporate documentation, missing licenses, ongoing disputes, real estate restrictions, or weak intellectual property protection.

Through practical examples, the authors illustrate the kinds of issues a due diligence process may uncover — from missing land ownership titles and risky employment contracts to “change of control” clauses in loan agreements that can significantly complicate a transaction. The article also explains why, in larger transactions, it is essential that the due diligence process be led by a qualified professional. It offers a practical perspective particularly valuable for investors, buyers, and sellers who are planning to enter into a transaction or assess the readiness of their own company.

The full article is available [HERE](#).



## 2.3 REGULATORY OFFICE FOR NETWORK INDUSTRIES

### ■ RONI approved energy prices for 2026

**4 December 2025** – RONI published an overview of the approved energy prices for 2026. Please note that, as of the preparation date of this report, the official pricing decisions had not yet been published on RONI's website.

In the area of **electricity**, RONI states that the average final price for households will increase year-on-year by 2,78%. The main reason is the significant rise in the commodity component—the wholesale electricity price. For typical households, this means higher annual expenses: for low consumption in tariff D1 by approximately 47 EUR, in the most common tariff D2 by 104 EUR, and for higher-consumption family houses by around 67 EUR per year.

In the **gas** segment, annual household costs are expected to increase by approximately 33%, compared to last year's subsidised price list. The fixed charges per delivery point remain unchanged according to RONI, but market developments in gas prices lead to an overall increase in the final price. Distribution charges remain the same or decrease slightly, but this effect is insufficient to offset the higher commodity price.

For **heat**, the changes are significantly milder. Despite public concerns about substantial cost increases, RONI notes that the average household will pay only about 4 EUR more per year for heat supply in 2026. The slight increase results from a combination of lower heat consumption, reduced fuel costs, and rising fixed costs, which partially balance each other out. Final heat prices also depend on weather conditions and the overall consumption behaviour of consumers.

A major regulatory innovation concerns **water** pricing. Some water utilities, following new decisions, have introduced a two-component tariff for water and wastewater services. This means that charges will no longer be based solely on consumption (the variable component), but a fixed component will be added and applied even in cases of zero or very low consumption. The fixed component may result in households paying a "standing charge". For an average household, this could mean a notable increase in annual water costs—according to RONI, typically several tens of euros per year.

More information is available in the article linked [HERE](#).

### ■ RONI on the Increase of Gas Transmission Tariffs

**29 November 2025** – RONI stated on its website that all media "speculation" regarding an increase in gas transmission tariffs is inaccurate. At present, only a public consultation initiated by the transmission system operator Eustream is underway, triggered by a significant decline in transported gas volumes (from 17.8 billion m<sup>3</sup> in 2024 to approximately 5.4 billion m<sup>3</sup> in 2025). Network utilisation currently stands at only about 6%.

RONI further clarified that no pricing proceeding concerning tariffs for 2026 has been opened yet. Any future decision on the tariff will be based solely on criteria defined by law

(allowed revenues, asset value, depreciation, reasonable profit), with the regulator guaranteeing a transparent, balanced, and fair process.

More information is available in the article linked [HERE](#).

## ■ **RONI Launches Pricing Proceedings for 2026 — Gas Prices Rising, Electricity and Water Stabilising**

**13 November 2025** – RONI has announced that the preparation of new pricing decisions for households in the electricity, gas, heat, and water segments for 2026 is fully underway.

According to the regulator, electricity and water prices are expected to remain relatively stable. For heat, RONI anticipates that annual household costs may not increase. However, the situation for gas remains more complex. RONI highlights the strong impact of geopolitical factors and rising transport/transmission costs, which may put upward pressure on prices.

The final decisions will be published only after the pricing proceedings are completed, with the regulator planning to conclude them in early December.

More information is available in the article linked [HERE](#).

## ■ **RONI: The Expansion of Battery Storage and the Challenges for Grid Stability**

**7 November 2025** – RONI published an analysis showing that the capacity of energy storage systems (ESS) in the V4 countries plus Austria, Germany, France, and Italy increased from 3,525 MWh in 2022 to 9,326 MWh in 2024, representing a growth of approximately 165%.

RONI warns that the rapid expansion of battery storage poses risks to the stability of the electricity grid if operators prioritise economic profitability (charging at low prices and discharging during peak prices) while failing to comply with the technical limits of the network.

More information is available in the article linked [HERE](#).

## **2.4 MINISTRY OF ECONOMY OF THE SLOVAK REPUBLIC**

### ■ **MoE SR announces support for the modernisation of Heating Plants**

**19 November 2025** – MoE SR announces that the state is launching support for high-efficiency combined heat and power generation (CHP), which is expected to significantly contribute to the modernisation of heating plants connected to district heating systems. The support will be allocated through a competitive tender, with successful projects being those offering the lowest bid price. The maximum eligible price is capped at 119.08 EUR/MWh, the support applies to units up to 220 MW, and it will not apply if the market price of electricity exceeds the bid price. The aim of this measure is to increase production efficiency, reduce emissions, and improve the financial sustainability of heating plant operations.



The support scheme published by the MoE SR is available [HERE](#), and we have already informed you about it in [the monitoring report for October 2025](#). More information can be found [HERE](#).

## 2.5 SHORT-TERM ELECTRICITY MARKET OPERATOR (OKTE)

### ■ OKTE: New Operating Code of OKTE

**1 December 2025** – OKTE informs that amendments to the OKTE Operating Code will enter into force on 3 December 2025 and 1 January 2026, following approval by RONI on 27 November 2025 under Decision No. 0017/2025/E-PP.

**The main changes** introduced by the new OKTE Operating Code include:

- A completely new Chapter 14 – IS FÚ (Billing Data Information System), which covers: **(i)** the provision of data for electricity suppliers' billing, **(ii)** rules for the allocation and receipt of data from DSOs, **(iii)** technical data specifications, **(iv)** deadlines for data submission (in particular "within 1 working day"), **(v)** claims handling and corrections of billing data.
- A new obligation for OKTE to provide billing data to electricity suppliers (a legislative duty effective from 1 January 2026). From 1 January 2026, OKTE must provide data in accordance with § 9(2) of Decree No. 207/2023 Coll.
- Adjustment of the minimum financial security requirements for settlement participants.
- Expansion of Day-Ahead Market products.
- Clarifications and minor edits throughout the document, consisting mainly of technical additions, rewording, and terminology alignment, without substantial changes to core processes.
- Expanded rules for the delivery of billing data DSO → OKTE and OKTE → suppliers. The new Operating Code sets out cases in which OKTE will not make data available (e.g., incorrect data structure, failed formal checks, missing specification of the data delivery method), as well as deadlines for making data available (notably: "no later than 1 working day").

The decision on the new OKTE Operating Code is available [HERE](#). The version of the OKTE Operating Code effective from **1 January 2026** is available [HERE](#).

### ■ OKTE: Mandatory Power Purchase Agreements for 2026–2027

**27 November 2025** – OKTE informs that you may request a new mandatory power purchase agreement for the years 2026–2027 via its IS OKTE information system — the agreement will be concluded with SPP a.s. as the mandatory purchaser.

After receiving the new agreement, it must be printed, signed, and both originals must be sent to SPP so that SPP receives them **no later than 15 December 2025**. The announcement and further information are available [HERE](#).

## ■ OKTE: The new ISFU system

**26 November 2025** – OKTE, a.s. announces that the new ISFU (Billing Data Information System) will be launched into production operation on 5 December 2025, and the system will be fully functional for market participants from 6 December 2025. The announcement and further information are available [HERE](#).

## ■ OKTE Launches New “Loop-Block” Product on the Day-Ahead Market Effective 3 December 2025

**25 November 2025** – OKTE informs market participants that it has published an announcement regarding the launch of a new product, “Loop-Block”, which will take effect on 3 December 2025, with the first trading day on 4 December 2025.

The “**Loop-Block**” product is a new type of block order for the day-ahead market that enables trading of continuous time intervals (blocks) which are activated only as a whole and only if the set price limit is met. This eliminates partial order executions, increasing flexibility and allowing better portfolio optimisation, particularly for producers or consumers with multi-hour or profile-intensive positions.

The announcement and further information are available [HERE](#).

## ■ OKTE Announcement – “Mandatory Power Purchase 2026–2027”

**20 November 2025** – OKTE announces that the Ministry of Economy (MoE SR) has designated Slovenský plynárenský priemysel, a.s. (SPP) as the mandatory electricity purchaser for the period 2026–2027.

In the coming days, it will be possible to request the conclusion of the Mandatory Power Purchase Agreement and the Agreement on Imbalance Responsibility for the period from 1 January 2026 to 31 December 2027 via the IS OZE system.

You can read more directly in the announcement [HERE](#).

## ■ OKTE: New Energy Guarantees of Origin Agreement Effective 1 December 2025

**6 November 2025** – OKTE informs market participants about the introduction of changes related to energy Guarantees of Origin (GOs) agreements. As of 1 December 2025, there will be a single unified agreement for GOs from both AIB member and non-member countries. The new agreement is simplified in several aspects and will cover electricity GOs as well as heat and cooling GOs. Existing agreements will remain valid. The new agreement can be concluded from 1 December 2025 via the [EDC platform](#). A template is available [at the provided address](#).

More information can be found [HERE](#).

## ■ OKTE: Change to the Energy Guarantees of Origin Price List effective 1 December 2025

**6 November 2025** – OKTE has informed market participants of its plan to amend the price list for Guarantees of Origin (GOs), effective 1 December 2025. The annual fixed account maintenance fee of EUR 120 (excl. VAT) will be abolished. The existing tariffs for issuing and transferring Guarantees of Origin will increase from EUR 0.005/MWh to EUR 0.008/MWh (excl. VAT). The updated price list is available [at the provided link](#).

More information can be found [HERE](#).

## 2.6 SLOVAK ELECTRICITY TRANSMISSION SYSTEM (SEPS)

### ■ SEPS: RONI sets System Services Tariffs for 2026

**4 December 2025** – SEPS announced that on 3 December 2025, RONI issued Decision No. 0067/2026/E, setting the system services tariffs for 2026.

RONI set the following System Services Tariffs (TSS) for 2026:

- **Group 1:** a reduction from 12,4207 → **10,9796 €/MWh** (-11,60 %)
- **Group 2:** increase from 4,4173 → **4,8310 €/MWh** (+9,37 %)
- **Group 3:** increase from 1,3402 → **1,4273 €/MWh** (+6,50 %)
- **Group 4:** a reduction from 1,2421 → **1,0979 €/MWh** (-11,61 %)

The decision is available [HERE](#). More information can be found in the SEPS announcement [HERE](#).

### ■ SEPS publishes its 2024 sustainability report – Financial Results, ESG, and Outlook for the Future

**28 November 2025** – SEPS announces that it has published its 2024 Sustainability Report, providing a comprehensive overview of the company's economic, environmental, and governance (ESG) activities and results.

The report tracks the implementation of ESG principles: the company reaffirms its commitment to economic, social, and environmental sustainability, including alignment with regulatory and environmental requirements of both Slovakia and the EU. The SEPS 2024 Sustainability Report is an important document for the energy market, as it outlines SEPS's plans for transmission system investments, environmental measures, and infrastructure modernisation — information relevant for generators, traders, and large consumers alike.

More details, including the full report, can be found in SEPS's official announcement [HERE](#).

# Poláček & Partners

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