



Monitoring report on the implementation of the approved TYDP

Reference period 2024-2033

February 2026

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Introduction

According to the provisions of article 93 par. 2 of the Network Code, DESFA monitors the implementation of the approved Ten Year Development Plan and justifies any deviation in the budget and the implementation schedule of each project, evaluates the impact of possible delays and provides supporting evidence of the measures taken to remedy this, especially for projects where the following have been identified:

A) Deviation of the current budget in relation to the budgeted cost of the project as provided in the approved Development Plan, **by an amount that exceeds a minimum of ten percent (10%) of the budget for the project included in the Development Plan, or an amount of two million (€ 2.000.000) Euros.**

B) Deviation of the current implementation schedule from the project timetable as per the approved Development Plan, **which leads to an increase of the total implementation time by ten percent (10%), counted in whole months.**

Annex I presents the comparison between the (latest) approved Development Plan 2024-2033 (approved from RAAEY with Decision E53/2025, Gov. Gazzete 4622 B/ 27.8.2025) and the draft Development Plan 2026-2035 submitted to RAAEY with letter no. **347496/06.02.2026** and highlights the deviations that exceed only the above limits, showing the respective justification.

In addition, article 95 par. 4 of the Network Code states that the Operator monitors separately the implementation progress of the projects included in the Small Projects List that were completed before the publication of the draft Development Plan.

The following project included in the List of Small projects ver. 29/7.2025 was completed before the publication of the draft TYDP 2026-2035 for consultation (28.11.2025)¹.

Physical Security Transformation Revithoussa -phase 1	
Scope	DESFA conducted a physical security assessment on Revithoussa LNG Terminal. The assessment highlighted the need to increase the security level of Revithoussa LNG terminal with the following technology C-UAS containment solution: the anti-drone solution has been identified as the top priority for physical security needs. Following the assessment, DESFA conducted a market consultation to identify the most suitable provider and technology. Intelligra Ltd emerged as the preferred provider of the C-UAS containment solution, utilizing Sentrycs technology based on an RF sensor and a hijacker for detecting, characterizing, tracking, pilot locating and mitigating unauthorized UAS access to the LNG Terminal premises. The system is able to protect the whole Aghia Triada MR and LNG terminal on Revithoussa Island from unauthorized UAS access.
Budget	2.358.000 €
Timeline	Final Investment Decision: July 2025 Operation Date/ entry in the system: July 2025 Project duration: 1 month

Part 1: Planned Projects included in the Development Plan 2024-2033 and completed

The following projects included in the previous TYDP 2024-2033 have been **completed** and are currently in operation:

Project	Budget
M Station at SALFA Ano Liossia	972.000 €
Replacement of Metering and Supervision/ Control systems at NNGTS M and M/R stations of NNGTS	4.700.000 €
LNG Upgrade Projects 2022	773.000 €

¹ Set in public consultation as draft Ten Year Development plan 2025-2034 and submitted to RAAEY as draft Ten Year Development Plan 2026-2035 per the suggestion of the latter.

Anti-Flood works and Damage Restoration in the Ampelia Station	5.062.000€
LNG Maintenance Projects 2023	1.066.000 €
Replacement of Fire and Gas Systems of NNGTS Stations	1.010.000 €
Renovation of Patima O&M Center	253.000 €
Replacement of obsolete safety vehicles	760.000 €
West Macedonia pipeline	190.938.000 €
Compressor Station Komotini	134.400.000 €
Compressor Station Ampelia	73.936.000 €
LNG Maintenance projects 2024-2025 (set in public consultation as LNG Maintenance projects 2024-2026)	1.200.000 €
Cathodic Corrosion Protection System Upgrading	2.041.546 €

The following projects were completed by the end of 2025-beginning 2026.

Project	Budget
Temporary supply of Naousa through ssLNG Installations	2.254.000 €
LNG Terminal Boil-off Gas Compressor Station	16.790.000 €
Replacement - Upgrade of M-4500 compressed air system	1.000.000
Required electromechanical equipment and tools	2.548.000 €
Operations technology upgrades	160.000 €

Electronic Information System (EIS)- functionalities upgrade	507.000 €
New electronic information system for natural gas (EDGE II)	4.400.000 €
New project management system (EDGE II)	1.800.000 €
Included in the published List of Small Projects²	
Waterproofing and corrosion protection of tanks A+B	507.500 €
Reconstruction of asphalt road at Kipoi for DESFA/TAP facilities- Phase 1	96.300 €
Capacity Increase of the ssLNG Station in Aspros	1.600.000 €
Upgrade of Docking System	270.000 €
Replacement of Batteries of UPS & Charger of S/S 3600	300.000 €
Upgrade of Emerson's DeltaV DCS/SIS System of BMS Sidirokasto	273.015 €
Total budget	32.505.815 €

Part 2: Planned Projects excluded from the draft Development Plan 2026-2035

The following projects were part of Development Plan 2024-2033 and were **excluded** from the draft TYDP 2026-2035.

1. Metering and Regulating Station for connecting with Dioriga Gas FSRU

The implementation of this Connection Project was conditional upon the timely fulfillment of specific contractual obligations of the Dioriga Gas FSRU project promoter. Since those were not met timely,

² [NNGS Development Plan - ΔΕΣΦΑ Α.Ε.](#)

the relevant agreement has expired, according to its terms and applicable legislation and consequently the Connection Project is excluded from the Ten-Year Development Plan.

2. Duplication of the HP branch Patima – Livadeia

This project was linked to the Connection Project under para. 1 above and its implementation was subject to Dioriga Gas FSRU final investment decision. The exclusion of the connection project from the TYDP for the reasons above also triggers the exclusion of this project.

3. Upgrading Projects of NNGS -3rd group- reassessment of the necessity of the investment.

3. Metal Roof at BMS Sidirokastro- reassessment of the necessity of the investment.

4. Argos/Nafplio M/R city gate station- the project will not move forward as the distribution system operator declared the unnecessary of the M/R station.

5. Metering and Regulating Station for connecting South Kavala underground storage: the project (outside the 3 YR Development Plan) meant to connect the Underground Storage facility in South Kavala with the NNGTS. Since there is no progress on the implementation of the UGS it is removed from the TYDP.

ANNEX I

Follow-up on the implementation progress of the Development Plan 2024-2033

Project	Approved ³ Budget	New Budget	Start Date	Approved date of Entry in the system	New Entry in the System	Project's duration (months)	New Project's duration (months)	
1	Pipeline Nea Mesimvria – Evzonon/ Gevgelija and M Station	92.036.000	92.036.000	Jun-17	Mar-26	Oct-26	105	112
Justification of deviations: Not applicable								
2	Connection of ELVAL plant of NNGTS	5.447.000	-	Dec-15	Mar-27	-	135	-
Justification of deviations: The budget and timeline of the project are under revision, following the User's request, and subject to the amendment of the Connection Agreement.								
3	Connection with THERMOILEKTRIKI KOMOTINIS Power Plant to the NNTGS	6.746.000	6.750.000	Jun-20	May-26	May-26	71	71
Justification of deviations: Not applicable								
4	Connection with ELPEDISON Power Plant to the NNTGS	3.993.000	-	Jun-20	Nov-25	-	65	-

³ TYDP 2024-2033 (RAAEY Decision E53-2025)

Justification of deviations: The budget and timeline of the project are under revision, following the User's request, and subject to the amendment of the Connection Agreement								
5	Connection of "Alexandroupolis SA" power station with NNGS and Metering Station	12.806.800	12.806.800	Jun-23	May-27	Sep-27	47	51
Justification of deviations: Not applicable								
6	Connection of " Larisa Thermoelectriki " power station with NNGS and Metering Station	7.521.500	7.931.500	Jun-23	Jun-27	Feb-28	48	57
Justification of deviations: <ul style="list-style-type: none"> Budget: Not applicable Timeline: The primary driver of the rescheduling is the signing of the Connection Agreement, which is expected in February 2026. In accordance with ARCA provisions, project completion is scheduled 24 months, February 2028, after the signing of the Connection Agreement. 								
7	M/R Station at the prefecture of Aspros	5.034.000	5.034.000	Dec-19	Jun-25	Nov-26	66	83
Justification of deviations: <ul style="list-style-type: none"> Budget: Not applicable Timeline: Reschedules to aligne with both HENGAS's updated timeline and ENAON's new draft Development Plan. The project is scheduled to commence operations for the 2026 heating season. 								
8	M/R Station in the region of Perdikas Eordeas	4.433.000	5.263.000	Dec-19	Jun-25	Mar-26	66	75
Justification of deviations:								

<ul style="list-style-type: none"> Budget: ENAON requested from November 2024, the upgrade in the design of the station with a final capacity of 10,000 Nm³/h (including the construction of both phases from the start. The above change in the technical design resulted in the need to construct a third line (3rd stream)). Timeline: The above change in the design resulted in a corresponding timeline extension. 								
9	Drimos/Liti M/R city gate station	4.000.000	4.000.000	Jul-20	Jul-27	Sep-27	84	86
Justification of deviations: Not applicable								
10	High Pressure Pipeline to Patras	101.395.000	117.000.000	July-20	Mar-27	Mar-28	80	92
Justification of deviations: <ul style="list-style-type: none"> Budget: Increase in the cost following the finalization of tender prices for pipes and hot bends. This increase reflects pipeline route changes identified through detailed topographic surveys, as well as revised unit prices from the basic design that account for market changes since the initial estimates. It was presented to the RAAEY Energy sector during the meeting on 24/07/2025 and approved with their decision O-116403/25.7.2025. Timeline: DESFA was ready to proceed with the Final Investment Decision (FID) in December 2025. However, the Competent Authority's delay, of over one year, in approving the Environmental Terms necessitated the postponement of the FID. Despite this delay, the project remains fully structured and execution-ready, with all preparatory work completed. Following the issuance of Environmental Terms and FID, DESFA has prioritized all necessary actions to award the pipes and hot bends supply contract and advance EPC construction tendering activities. It should be noted here that the project schedule will continue to slip while the Ministry delays issuing the Environmental Terms. 								
11	M/R Station to Veroia	3.666.000	3.666.000	Oct-21	Jul-25	Sep-26	45	59
Justification of deviations: <ul style="list-style-type: none"> Budget: Not applicable Timeline: The project aligns with Distributor Operator's new draft 10-Year Development Plan (10YDP) and is scheduled to commence operations for the 2026 heating season. 								
12	M/R Station to Naousa	3.666.000	3.666.000	Oct-21	Jul-25	Oct-26	45	60

Justification of deviations:								
<ul style="list-style-type: none"> Budget: Not applicable Timeline: The project aligns with Distributor Operator's new draft 10-Year Development Plan (10YDP) 								
13	Ports' Extension/Upgrade for the LNG Trucks transfer to and from Revithoussa Terminal Station (remaining part of TLS project)	1.720.000	1.720.000	Apr-16	Jun-25	Nov-26	110	127
Justification of deviations:								
<ul style="list-style-type: none"> Budget: Not applicable Timeline: On February 1, 2024, the Elefsina Port Authority (OLE) granted Decision 12/435 for DESFA, authorizing a 15-year composite use of the Perama Megaridos port area to expand the existing jetty for SSLNG truck transport. HRADF subsequently approved this decision on April 22, 2024. However, under current legislation, the Ministry of Maritime Affairs must also approve Decision 12/435 before it can take effect. OLE submitted the required documentation to the Ministry in May 2024. Approval remains pending, which has delayed the project's advancement. Upon receiving Ministry approval, DESFA will immediately initiate procurement and begin implementation. The project schedule will continue to slip while the Ministry of Maritime Affairs' approval remains pending. 								
14	New jetty for small scale LNG in Revithoussa	37.507.000	44.207.000	Jun-17	Dec-25	Mar-27	102	117
Justification of deviations:								
<ul style="list-style-type: none"> Budget: There is an increase in the projected cost of platform system and the Project's general contingencies Timeline: Additional delays resulted from the cancellation of the original platform system tender and subsequent re-tendering process, driven by the need for further analysis to ensure compliance with co-funding requirements and promote enhanced competition. 								
15	Booster Compressor for TAP in Nea Mesimvria	47.968.000	49.468.000	Dec-19	Dec-25	Dec-26	72	84
Justification of deviations:								
<ul style="list-style-type: none"> Budget: Not applicable 								

<ul style="list-style-type: none"> Timeline: The schedule extension results from additional work necessitated by the revised plot plan and delays in the permitting process. 								
16	Duplication of Karperi - Komotini HP branch	310.563.000	321.563.000	Feb-23	Mar-27	Mar-28	49	61
<p>Justification of deviations</p> <ul style="list-style-type: none"> Budget: There is an increase mainly in the estimated Right-of-Way (RoW) compensation costs and archaeological services. It was presented in RAAEY and approved with O-116403/25.7.2025 in implementation of the decision of the 24.7.2025 meeting of the of the Energy Sector of RAAEY. Timeline: The primary driver of the schedule extension is the delayed approval of Environmental Terms, which were received in December 2025. The timeline also accounts for the finalization of major tenders, specifically for steel pipe supply and the EPC contract for pipeline construction. It was presented in RAAEY and approved with O-116403/25.7.2025 in implementation of the decision of the 24.7.2025 meeting of the of the Energy Sector of RAAEY. 								
17	Upgrade of LNG and O &M Facilities for energy saving	2.000.000	360.000	Dec-19	Mar-25	Feb-26	63	74
<p>Justification of deviations</p> <ul style="list-style-type: none"> Budget: The budget reflects the remaining project scope—the LNG facility upgrade—as the O&M component has been completed. Timeline: The remaining LNG works were rescheduled to align with operational requirements at the Revithoussa Terminal. The remaining LNG works were rescheduled to align with Revithoussa Terminal operational requirements. 								
18	Expansion and Upgrade of M/R Stations of Exit Point to Distribution Network 'Athens'	3.307.000	3.307.000	Oct-21	Dec-25	Sep-26	50	59
<p>Justification of deviations:</p> <ul style="list-style-type: none"> Budget: Not applicable Timeline: The delay is due to additional refine and optimize the project design, extending the basic design phase. 								
19	Construction of a new Metering & Regulating	2.401.000	2.401.000	Oct-21	Dec-25	Jun-28	50	80

	Station in Markopoulo Site to replace the existing temporary M/R							
Justification of deviations:								
<ul style="list-style-type: none"> Budget: Not applicable Timeline: The project timeline is contingent upon receiving critical data from the distribution company, EnaonEDA. Enaon has not yet provided the required consumption quantities for the area, which are essential for DESFA to complete the final basic design of the new station. DESFA is prepared to advance upon receipt of this data. 								
20	Upgrade of Fire Fighting System & replacement of the pressure relief valves at BMS Sidirokastro	879.500	879.500	Oct-21	Mar-25	Jun-27	41	68
Justification of deviations:								
<ul style="list-style-type: none"> Budget: Not applicable Timeline: The project has been rescheduled to align with the optimal shutdown period to ensure safety and operational integrity during execution. 								
21	Nitrogen injection system	2.783.000	3.253.000	Oct-21	Nov-25	Oct-26	49	60
Justification of deviations:								
<ul style="list-style-type: none"> Budget: The cost increase is primarily attributed to continuous raw material price fluctuations and increases since 2021, including: <ul style="list-style-type: none"> Higher market overheads and fixed costs Increased daily rates and fabrication costs Timeline: The project schedule is aligned with the “Booster Compressor to TAP in Nea Mesimvria” project timeline. 								
22	Necessary modifications to Nea Mesimvria M/R Station for the interconnection of	2.267.000	2.267.000	Jul-22	Nov-25	Dec-26	40	53

	NNGTS with TAP, for Reverse Flow Operation							
Justification of deviations								
<ul style="list-style-type: none"> Budget: Not applicable Timeline: Schedule alignment with the Compressor Station Booster project timeline. 								
23	Geohazards Management Upgrade Project	920.000	920.000	Jan-23	Dec-25	Dec-27	35	59
Justification of deviations								
<ul style="list-style-type: none"> Budget: Not applicable Timeline: The new completion date reflects the revised estimation for installation completion of additional geotechnical instruments in new Areas of Concern along the pipeline route as well as the extra time required for the realization of a LiDAR pilot project. 								
24	Upgrade of physical access control systems	555.000	555.000	Jan-23	Sep-25	Sep-26	32	44
Justification of deviations:								
<ul style="list-style-type: none"> Budget: n/a Timeline: The works for the HQ Renovation project were delayed affecting the timeline of this project 								
25	Upgrade of Control Room, Guardhouse and Fire Brigade Building of the LNG Terminal in Revithoussa – Phase 1	100.000	1.800.000	Feb-23	Jun-25	Dec-27	28	50
Justification of deviations								
<ul style="list-style-type: none"> Budget & Timeline: The increase in budget & delay in the implementation reflects the expanded scope of Phase 1, which includes defining all project requirements and delivering detailed technical specifications for the EPC implementation in Phase 2. 								
26	Replacement - Upgrade of the Central Control System (DCS - FGS – ESD) of Revithoussa Terminal	3.037.000	3.037.000	Feb-23	Dec-25	Dec-26	46	46

Justification of deviations: <ul style="list-style-type: none"> Budget: Not applicable Timeline: The DCS replacement and ESD upgrade have been completed, while the FGS remains pending. The schedule extension was necessary to reflect the extra effort performed for the reliable execution of the technical feasibility study, necessary for the award of the relevant EPC contract. 								
27	New quay for passenger boat at Agia Triada & Revithoussa	2.211.400	2.211.400	Feb-23	Dec-25	Feb-28	34	66
Justification of deviations: <ul style="list-style-type: none"> Budget: Not applicable Timeline: The delay is due to the extended design period required to accommodate the operational requirements of the Revithoussa's Terminal. 								
28	Digital Transformation Program Phase III (EDGE III)	3.950.000	4.350.000	Feb-23	Dec-26	Jun-26	46	40
Justification of deviations: <ul style="list-style-type: none"> Budget: The delay is due to the project's maturity stage; following a thorough assessment of project requirements and scope, the budget was reviewed and adjusted accordingly. Timeline: n/a 								
29	Overhaul of LNG pumps	4.045.000	5.100.000	Jan-24	Dec-25	Dec-26	23	35
Justification of deviations: <ul style="list-style-type: none"> Budget: Increase is due to the addition of a new activity related to the overhaul of the BOG compressor. Timeline: Extension is due to the introduction of the new project (BOG compressor overhaul), which has an extended timeline. 								
30	Intelligent Pigging inspection project of NNGTS	1.013.000	1.013.000	May-24	Dec-26	Dec-26	31	31

Justification of deviations:								
<ul style="list-style-type: none"> Budget: Not applicable Timeline: Not applicable 								
31	Upgrade of Valves - Installation of electric actuators	1.521.000	1.521.000	May-24	Dec-26	Dec-27	31	43
Justification of deviations:								
<ul style="list-style-type: none"> Budget: Not applicable Timeline: Not applicable 								
32	Replacement & Upgrade of Unloading Arm C	3.011.000	3.011.000	May-24	Dec-25	Dec-26	19	31
Justification of deviations:								
<ul style="list-style-type: none"> Budget: Not applicable Timeline: According to the original timeline the delivery of the spare parts for the overhaul maintenance of the unloading arm, was scheduled for October 2025 and the replacement works have been scheduled until the end of the year. Though, the production of the spare parts is expected to be completed within January 2026, due to delay in the production line of the vendor. As the maintenance will reduce the unloading technical capacity of the terminal, it was decided the works to be performed in a time window with lower unloading needs, to secure the security of supply of the market. According to the dispatching center estimations this period is October 2026. 								
33	Renovation of DESFA's headquarters	5.200.000	9.200.000	Jul-24	Jan-26	Dec-26	18	29
Justification of deviations:								
<ul style="list-style-type: none"> Budget: The increase in the budget is due to the expansion of the project scope to include the upgrade of floor -1 and the creation of a new auditorium at the HQ. This initiative will provide DESFA with the ability to host all key internal events in-house , enhance organizational efficiency, and offer a modern space tailored to the company's evolving needs. Timeline: Subsequently to cover the increase in the scope the timeline need to be extended to end of 2026 								

34	Installation of Process & Dry Seal Recompression System in Nea Mesimvria CS	4.820.000	5.180.000	Feb-23	Oct-25	Jul-26	32	46
Justification of deviations: <ul style="list-style-type: none"> Budget: n/a Timeline: Delay caused by extended negotiations for the Dry Seal Recompression System, affecting procurement and overall schedule. 								
35	Installation of Process & Dry Seal Recompression System in Booster Compressor to TAP in Nea Messimvria	4.562.000	4.562.000	Feb-23	Dec-25	Jun-28	34	64
Justification of deviations: <ul style="list-style-type: none"> Budget: n/a Timeline: Rescheduled following operational needs analysis, with Dry Seal works executed sequentially at Nea Mesimvria, Ampelia, and Booster CS. 								
36	Installation of Process & Dry Seal Recompression System in Ampelia Compressor Station	4.562.000	4.562.000	Feb-23	Dec-25	Dec-27	34	58
Justification of deviations: <ul style="list-style-type: none"> Budget: n/a Timeline: Reschedule of FID, as a few months of operational period of CS Ameplia are needed to finalize the specifications and parameters of the recompressor system. 								
37	Pyrolysis project	425.000	554.000	Feb-23	Apr-26	Dec-27	38	58

Justification of deviation: <ul style="list-style-type: none"> Budget & Timeline: The increase in the budget is due to the increase in the cost of materials. The postponement of the project completion date is due to the delay in finding the appropriate materials. 								
38	Technical Training Center H2 Injection Facility	768.000	768.000	Jul-24	Dec-25	Dec-27	17	41
Justification of deviation: <ul style="list-style-type: none"> Budget: Not applicable Timeline: Not applicable 								
39	Amyntaio-Komnina pipeline	13.006.000	17.500.000	Jul-24	Dec-27	25 months from FID	41	-
Justification of deviation: <ul style="list-style-type: none"> Budget: The budget difference results from the pipeline diameter increase from 8" to 14" to accommodate H2 line pack use, as well as increased contingency allowances to address undefined technical parameters related to critical project components pending further detailed design (i.e., compressor station, blending facilities, etc.). It was presented in RAAEY and approved with O-116403/25.7.2025 in implementation of the decision of the 24.7.2025 meeting of the Energy Sector of RAAEY. Timeline: Not applicable 								