

POSITION PAPER

MOLDOVA COULD RETURN TO PURCHASING ENERGY FROM MOLDGRES

Authors:

Sergiu Tofilat

Eugen Muravschi

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Summary

Due to gaps in legislation, Moldova could return to purchasing energy from the MoldGRES power plant at double the price and, implicitly, to financing the transnistrian separatist region.

Information has appeared in the public space regarding a possible resumption of electricity procurement from MoldGRES,¹ even though the Moldovan government has committed to ending its dependence on Russian energy resources, which are constantly used as a tool for blackmail. This commitment was made in February 2025 in exchange for EUR 250 million in financial support from the European Commission. However, the Government did not inform ANRE of the need to change the electricity procurement procedure to exclude the MoldGRES power plant from participating in tenders.

During the state of emergency, energy procurement was carried out by Energocom based on a public service obligation assigned by the Government.² This obligation will expire on December 31, 2025, after which the auction procedures will be applied in accordance with the electricity market rules, approved by ANRE Decision No. 283/2020.

There is a gap in electricity procurement procedures: **any participant who has no debts to the supplier of fuel used in energy production may qualify**. MoldGRES purchases gas from TiraspolTransgaz-Pridnestrovie, and tariffs are set at the discretion of the so-called government in Tiraspol. Therefore, MoldGRES can easily present a "certificate" confirming that it has no gas debts and will be able to participate in energy procurement tenders organized by operators in Moldova.

Under current conditions, there is a legal possibility for Moldova to resume purchasing electricity from MoldGRES, thereby contributing to the financing of the separatist region. Suppliers in Ukraine will not be able to participate in tenders because they are facing energy shortages and load shedding. Accordingly, MoldGRES will only compete with suppliers from Romania, where the average energy price exceeds EUR 125/MWh. Since the Transnistrian region does not pay for gas consumption, MoldGRES can offer a "slightly" lower price (EUR 124.5/MWh, for example), and Moldovan suppliers will have no legal grounds to reject it. For comparison, in 2024, the Republic of Moldova purchased energy from MoldGRES at a price of EUR 60/MWh (USD 66 USD/MWh).

¹ Moldelectrica press release with reference to information appearing in the public space, November 24, 2025, https://moldelectrica.md/ro/news/latest_news/120

² Government decision 156 of 26.03.2025, https://www.legis.md/cautare/getResults?doc_id=147714&lang=ro

Commitments made by the Government to the EU

In February 2025, Prime Minister Dorin Recean and European Commissioner for Enlargement Marta Kos signed a letter of intent, whereby the Government of the Republic of Moldova undertook a series of commitments to strengthen energy independence in response to Gazprom's complete cut-off of gas supplies. In return, the Republic of Moldova received financial support of EUR 250 million from the European Union.³ The financial assistance provided compensation for the increase in energy tariffs on the right bank, as well as EUR 60 million that can be used for consumers on the left bank of the Dniester.

- The government has committed to adopting a strategy that will make Moldova less vulnerable to blackmail and less dependent on Russian gas for both heat and electricity production (page 2 of the letter of intent):

- (iii) **A socially acceptable approach for progressive energy price alignment**, accompanied by a robust and expanded mechanism for mitigating the impact of higher energy prices, including notably the protection of vulnerable consumers.
- (iv) **A clear strategy for ensuring that Moldova can be decoupled from the insecurity related to Russian gas supplies in the future both in terms of gas use for heating and for electricity generation.**

- Similarly, the Government was to adopt a decision on completely eliminating any dependence on unstable supplies of Russian energy resources (page 5 of the letter of intent):

- Adoption of the National Energy and Climate Plan (NECP).
- The Government of Moldova requests a new financial instrument from the EBRD.
- **The Government of Moldova will adopt a Government Decision to stipulate a full phase out of any form of dependence on Russian supply of energy resources**

For clarification, electricity procurement auctions are conducted according to the rules approved by ANRE. Therefore, the Government should have notified ANRE of the need to amend the electricity procurement procedures. However, to date, the procedures have not been amended.

³ Letter of intent between the Government of the Republic of Moldova and the European Commission, 04.02.2025, https://enlargement.ec.europa.eu/letter-intent-between-government-republic-moldova-and-european-commission_en

How electricity procurement auctions are conducted

Energy procurements are carried out in accordance with the procedures set out in Annex 1 to the electricity market rules, approved by ANRE Decision No. 283/2020.⁴ Auctions are organized by the following operators:

- **Transmission system operator** (Moldelectrica) and **Distribution system operators** (RED-Nord and Premier Energy distribution), to cover the technical losses of electricity in power grids;
- **Electricity suppliers**, based on their public service obligation (FEE-Nord, Premier Energy supply), for the supply of energy to end consumers.

In 2025, no energy procurement auctions were held because the government assigned public service obligations to Energocom,⁵ for several reasons:

- Since January 1, 2025, the Republic of Moldova has been importing energy from Romania. After Gazprom unilaterally stopped gas deliveries, MoldGRES no longer supplies energy to the right bank;
- In Romania, the price of electricity was capped until June 30, 2025, and was lower than the market price. Romania extended this subsidy to consumers in the Republic of Moldova because energy imports were carried out by Energocom, a state-owned company;
- Although we are connected to the European electricity grid, we can only import a limited amount of energy. According to information published by the government, Moldova's import quota is 315 MW per hour, while the energy deficit during peak hours is around 600 MWh.⁶ For this reason, Energocom staff monitor Ukraine's unused import capacity on an hourly basis every day and reallocate it to cover Moldova's energy consumption.

As the public service obligation assigned to Energocom will expire on December 31, 2025, other operators have recently launched tenders for energy procurement, which must be completed by the end of the year.

⁴ ANRE decision 283/2020 on the approval of the Electricity Market Rules, annex 1, https://www.legis.md/cautare/getResults?doc_id=150615&lang=ro#

⁵ Government decision 156 of 26.03.2025, https://www.legis.md/cautare/getResults?doc_id=147714&lang=ro

⁶ (PDF file) See page 2 of the explanatory note to the Government Decision 156 of 26.03.2025, <https://gov.md/sites/default/files/media/documents/sedinte-de-guvern/2025-04/05-NU-97-MEn-2025.pdf>

The energy procurement procedures established by ANRE include certain requirements for the qualification of bidders. One of the requirements is proof that participants (power plants) have no debts to fuel suppliers, which is used in the production of electricity:

29¹. Cumpărătorul poate să includă în caietul de sarcini cerințe privind următoarele informații, fără a se limita la:

- Capacitatea alocată pe perioada contractului pentru interconexiunile respective, în cazul importatorilor de energie electrică;
- Criterii tehnice: Sursa de energie electrică (centrală electrică proprie, cumpărare din piață, import (din ce țară), altele);
- Dovada disponibilității puterii și cantității suficiente de energie electrică;
- Dovada deținerii volumului suficient de combustibil pe perioada contractului, precum și lipsa datoriilor față de furnizorii de combustibil, în cazul producătorilor care procesează combustibil pentru a produce energie electrică.

30. Caietul de sarcini poate include cerințe legate de garanții financiare pentru executarea contractului.

All operators are required to comply with the rules approved by ANRE and include these provisions in the terms of reference for conducting electricity procurement tenders. These provisions are found in the specifications published by Moldelectrica⁷:

8. Informația necesară de a fi prezentată în oferte

Informația necesară, prezentată de ofertanți va include, fără a se limita la, următoarele:

- Sursa de energie electrică (centrală electrică proprie, achiziționare de pe piață, import (cu indicarea țării de origine), altele);
- Dovada sau declarația pe propria răspundere privind disponibilitatea puterii și cantității suficiente de energie electrică;
- Dovada sau declarația pe propria răspundere privind asumarea obligațiilor de asigurare a capacității pe toată durata contractului pentru interconexiunile respective, în cazul importatorilor de energie electrică;
- Dovada sau declarația pe propria răspundere privind deținerea volumului suficient de combustibil pe perioada Contractului, precum și lipsa datoriilor față de furnizorii de combustibil, în cazul producătorilor care utilizează combustibil pentru a produce energie electrică
- Dovada lipsei datoriilor și/sau altor plăți restante față de Î.S. "Moldelectrica".

⁷ (PDF file) Moldelectrica's terms of reference of November 20, 2025,
[https://moldelectrica.md/files/docs/8/505_Caiet_de_SARCINI_20.11.2025_\(12_luni\)_www.pdf](https://moldelectrica.md/files/docs/8/505_Caiet_de_SARCINI_20.11.2025_(12_luni)_www.pdf)

This provision is also found in the terms of reference of other operators. (FEE-Nord,⁸ Premier Energy⁹ and RED-Nord¹⁰).

How MoldGRES can resume energy supplies to Moldova

The MoldGRES power plant is included in the list of prequalified participants for tenders organized by Moldelectrica. The latter explained that the information is from 2021 and has not been updated.¹¹

In reality, the problem stems from the fact that the tender procedures have not been changed. ANRE was supposed to amend them in line with the commitments made by the government to the European Commission back in February 2025, but this did not happen. Therefore, neither Moldelectrica nor the other operators that initiated the tenders have any legal grounds to refuse MoldGRES' participation in the tenders.

MoldGRES is eligible to participate in energy procurement tenders if it provides confirmation that it has no debts for gas consumption. MoldGRES procures gas from TiraspolTransgaz-Pridnestrovie,¹² and tariffs are set by the so-called government of the transnistrian region.¹³

Therefore, the Government should explain why it did not request ANRE to amend the energy procurement procedures in order to implement the commitments made to the European Commission regarding the strengthening of energy security. Why, from February until now, have the energy procurement procedures not been amended?!

Another reason for suspicion is the fact that the director of Moldelectrica, just one week after his appointment ¹⁴ (14.11.2025), visited the MoldGRES power plant.¹⁵ This visit was covered by the media on the left bank of the Dniester, while Moldelectrica did not publish any official statement regarding the purpose of the visit. More recently, the

⁸ Tender announcement by FEE-Nord, <https://fee-nord.md/anunt-privind-initierea-licitatiei-repetate-pentru-procurarea-energiei-electrice/>

⁹ Tender announcement by Premier Energy, <https://premierenergy.md/cunoaste-ne/achizitii-pe/achizitii-anuale-de-energie/achizitii-anuale-de-energie-2025/>

¹⁰ Tender announcement by RED-Nord, <https://rednord.md/achizitii-de-energia-electrica>

¹¹ Press release of Moldelectrica of November 24, 2025, https://moldelectrica.md/ro/news/latest_news/120

¹² TiraspolTransgaz-Pridnestrovie tariffs, https://www.ttgpmr.com/tarif_price/yurlitsa/tarify-dlya-yurlits-i-ip/

¹³ The ruling of the so-called transnistrian government, <https://mer.gospmr.org/zakoni/postanovlenie-ot-27-maya-2024-goda-%E2%84%96-258-o-stoimosti-prirodnogo-gaza-gazovoj-sostavlyayushhej-uchityvaemoj-v-predelnyh-urovnyah-tarifov-na-uslugi-gazosnabzheniya-na-2025-god>

¹⁴ Press release of Moldelectrica of November 14, 2025, https://moldelectrica.md/ro/news/latest_news/118

¹⁵ Moldelectrica's visit to MoldGRES on November 21, 2025, (1) <https://t.me/moldgres/9094>, (2) <https://tiraspol-news.ru/other/2025/11/21/221124.html>

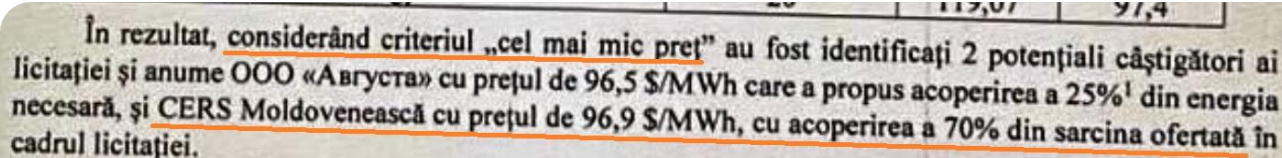
so-called foreign minister of the transnistrian region, Vitalii Ignatiev, stated that there is potential for MoldGRES to resume energy deliveries both to Moldova and for export.¹⁶

Risks regarding MoldGRES' admission to energy procurement tenders

If energy procurement auctions continue to be conducted according to existing rules, operators will have a choice between offers from Romania or MoldGRES. The average price of energy on the Romanian OPCOM electricity exchange in October-November 2025 was over EUR 125/MWh.¹⁷ This means that MoldGRES could offer an insignificant discount, and Moldovan operators will be forced to accept the offer.

In this situation, MoldGRES could resume energy deliveries to Moldova at a price of over EUR 120/MWh, or double the price paid in 2024. Or this will mean **an increase in funding for the separatist budget, which collects money from the sale of gas used to produce energy that will be delivered to Moldova.**

We recall that a similar situation occurred in 2022, when MoldGRES won the auction organized by Energocom with a price of USD 96.9/MWh.¹⁸



În rezultat, considerând criteriul „cel mai mic preț” au fost identificați 2 potențiali câștigători ai licitației și anume OOO «Августа» cu prețul de 96,5 \$/MWh care a propus acoperirea a 25%¹ din energia necesară, și CERS Moldovenească cu prețul de 96,9 \$/MWh, cu acoperirea a 70% din sarcina ofertată în cadrul licitației.

However, resuming energy deliveries from MoldGRES would require additional volumes of Russian gas. Gazprom supplies gas to the EU via the Turkstream pipeline, which is already operating at full capacity. But there is also the Bluestream pipeline, connected to the gas network in Turkey and Bulgaria via the Strandzha (BG)/Malkoclar (TR) interconnection point. This route has a capacity of approximately 11 million m³/day, and daily flows vary between 4-9 million m³/day.¹⁹ Therefore, technically Gazprom could supply certain volumes of gas to enable the Transnistrian region to increase its energy production.

¹⁶ Ignatiev on the potential for resuming energy supplies, 11.12.2025, <https://novostipmr.com/ru/news/25-12-11/ignatiev-na-dannyi-moment-ot-moldovy-ne-postupalo-predlozheniy-po>

¹⁷ OPCOM report for November 2025, https://opcom.ro/uploads/doc/rapoarte/lunar/R_2511_RO.pdf

¹⁸ Mold-street.com, May 03, 2022, <https://www.mold-street.com/noutate/detalii-din-culisele-licitatiei-nicio-companie-nu-a-propus-100-din-necesarul-de-energie>

¹⁹ ENTSO-G transparency platform, <https://transparency.entsog.eu/#/points/data?from=2024-01-01&indicators=Physical%20Flow%2CFirm%20Technical&points=bg-tso-0001itp-00041entry>

Recommendations

1. Modification of electricity procurement procedures

ANRE must adjust the procedures for organizing energy procurement auctions so that all participants are on equal terms. As long as the transnistrian region does not pay for gas consumption, MoldGRES benefits from low gas tariffs and can influence the results of auctions in its favor.

One option would be to include a provision requiring participants to provide proof that they have no fuel (gas) debts to registered and licensed suppliers in a member country of the European Energy Community Treaty. In this case, MoldGRES will not be able to provide “confirmation” issued by TiraspolTransgaz-Pridnestrovie.

2. Organizing auctions only for transmission and distribution operators

Given the limited capacity to import energy from European networks, it is reasonable to organize auctions only to cover technical losses of energy in transmission and distribution grids (approximately 10% of total energy consumption). This measure will allow local producers to participate in auctions and will create incentives for the development of the electricity market.

3. Extension of public service obligations to Energocom for the supply segment

The supply service (FEE-Nord and Premier Energy supply) accounts for approximately 90% of total energy consumption. To cover this energy consumption, it is reasonable to extend Energocom's public service obligations. This will allow them to continue to procure energy on the Romanian market and reallocate import capacities not used by the Ukrainian side on an hourly basis until a more sustainable solution is identified.