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SOLAR ENERGY ASSOCIATION of UKRAINE

SOLAR BESS GRID 2026 · WARSAW

Legal Instruments for Implementing Solar PV and Solar PV + BESS Projects in Ukraine, 2026



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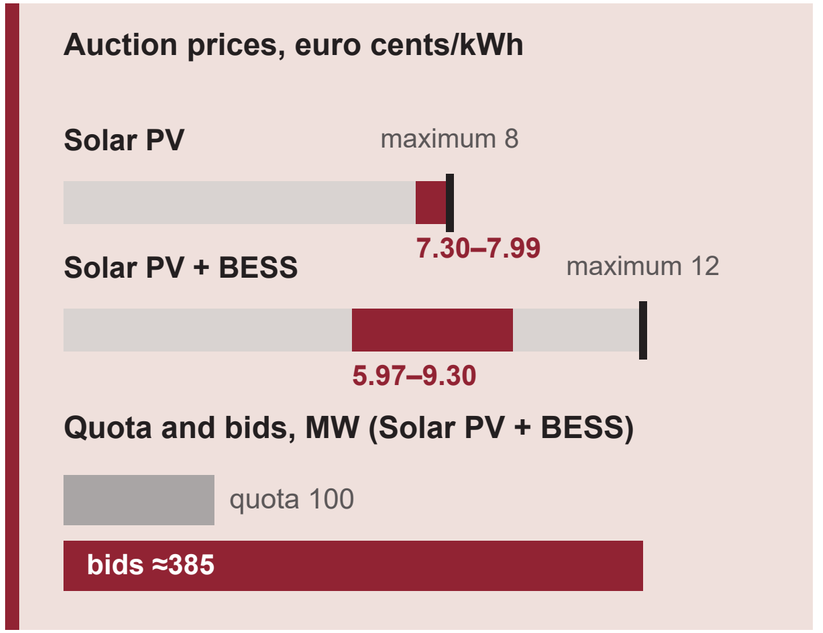
Main Legal Models for Using Solar PV Plants

	Model	Grid injection	Generation licence	Energy storage licence	Imbalance charges / liability	Revenue logic
	**1. Solar PV plant for an industrial consumer's own needs** (self-consumption mechanism)	None	Not required	Not required	None	Reduced electricity costs
	**2. Active consumer** (self-generation / net billing mechanism)	Permitted injection capacity of up to 50% of contracted capacity	Not required up to 5 MW; until 01.01.2028 up to 20 MW	Not required up to 5 MW	None. The electricity supplier or aggregator is responsible for imbalances	Reduced electricity costs, sale of surplus generation to the grid at free prices, provision of demand-side management services
	**3. Wholesale market**	No restrictions	Licence if >5 MW	No separate storage licence at the site of a licensed solar PV plant	Yes	Sale of electricity under bilateral contracts/CPPAs, on the day-ahead market (DAM), the intraday market (IDM) and the balancing market
	**4. Support auction**	As on the wholesale market (no restrictions)	Licence required regardless of capacity	Storage licence not mandatory	Yes	Revenue sources as on the wholesale market + market premium at the auction price for 12 years

“Green” Auctions of the Guaranteed Buyer

The auction determines the auction price, which is fixed in euro for 12 years. The Guaranteed Buyer pays a market premium: the difference between the auction price and the reference price. The programme runs until 31.12.2034

	Solar PV	Solar PV + BESS
2026 quota	50 MW	100 MW
Maximum bid price	8 euro cents/kWh	12 euro cents/kWh
Result of 25.09.2026	2 participants, 3 bids: 7.30 and 7.99 euro cents	≈385 MW of bids (almost 4× the quota); winners: 5.97–9.30 euro cents (−23…−50% against the maximum price)
BESS requirements	none	≥80% of the solar PV capacity; ≥2 kWh per 1 kW of solar PV
Hours without premium accrual	night hours	2 midday hours (12:00–14:00)



Conditions: 18 months for construction and connection; financial security of 5 euro/kW (participation), 10 euro/kW (winner)

Each year the Government sets the size of the quotas. According to the indicative figures, the preliminary quotas for 2027 are: 15 MW for solar PV, 30 MW for solar PV + BESS

Legal Models for Connecting Solar PV and BESS to the Grids

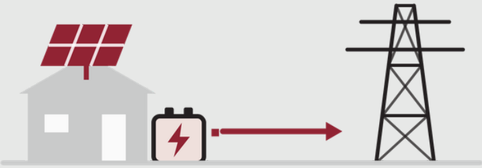
MODEL 1. No connection and no injection of energy into the external grid

- Solar PV and BESS on the premises/site of an industrial consumer: self-consumption, no injection into the grid (the solar PV plant operates within the consumer's internal networks)



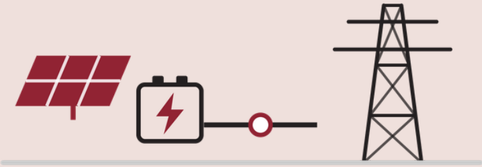
MODEL 2. No connection, but with injection of energy into the external grid through an industrial consumer

- Solar PV and BESS are installed on the premises/site of an active consumer (the solar PV plant operates within the consumer's internal networks, but the consumer may sell surplus energy to the grid)
- Solar PV and BESS on a plot adjacent to the active consumer's facility are connected to the consumer's networks, and the consumer injects surplus energy into the grid

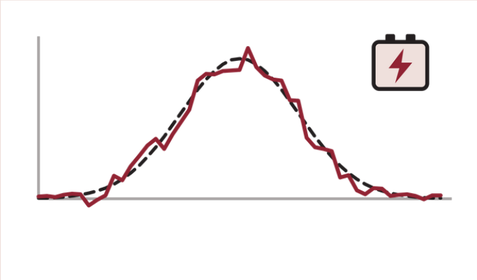


MODEL 3. Connection to external grids (DSO / TSO)

- **Conventional solar PV plant:** Solar PV and BESS are connected to the distribution system operator's networks under the general procedure, which involves payment for capacity and a connection fee. A separate plot, own connection point, separate connection agreement
- **Flexible connection:** Solar PV and BESS are connected to the distribution system operator's networks with limited (non-guaranteed) available capacity (depending on grid load), but the connection time and cost are significantly lower compared with a conventional (standard) connection
- **Cable pooling:** allows the use of an industrial consumer's existing connection point and capacity. Solar PV and BESS are connected at one shared point without a separate payment for capacity, which significantly reduces connection costs. Injection and offtake not above the permitted capacity; separate metering

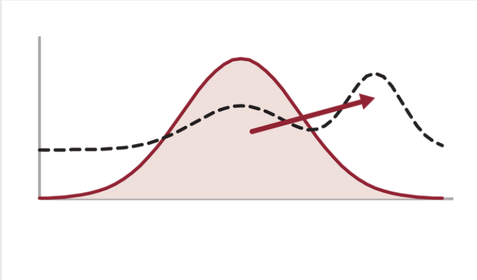


Using BESS as an Additional Revenue Source for Solar PV



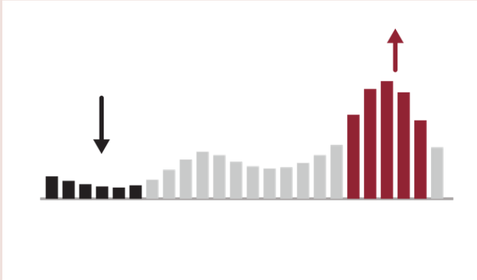
1 Managing solar PV imbalances

BESS compensates for deviations from the generation schedule and reduces the cost of imbalances



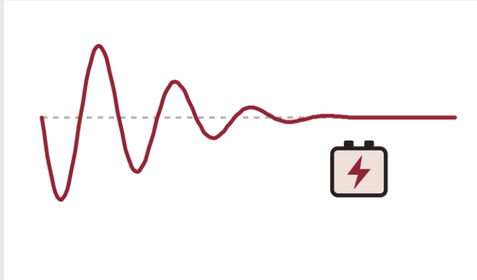
2 Generation shifting

BESS is used to shift electricity generated by solar PV in time, from daytime peaks (when minimum prices apply) to the period of maximum market prices



3 Arbitrage

BESS is used to charge with electricity from the grid during hours when minimum prices apply, in order to sell it later during the period of maximum market prices



4 Ancillary services

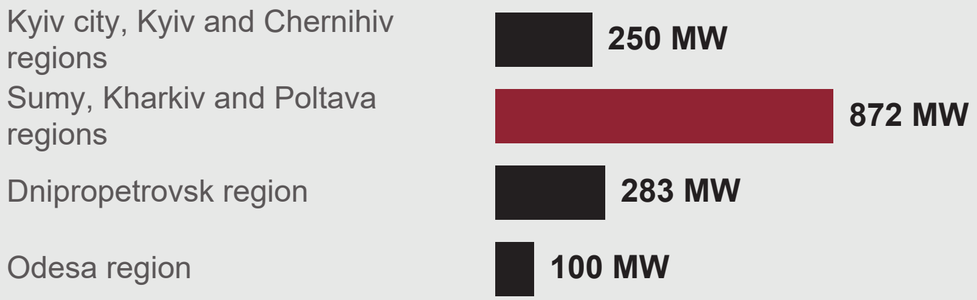
BESS is used to provide ancillary services, in particular to participate in Ukrenergo's special auctions for fast reserves, as well as for demand response through aggregation

Ukrenergo Tenders for Constructing Flexible Capacity

The tender provides for

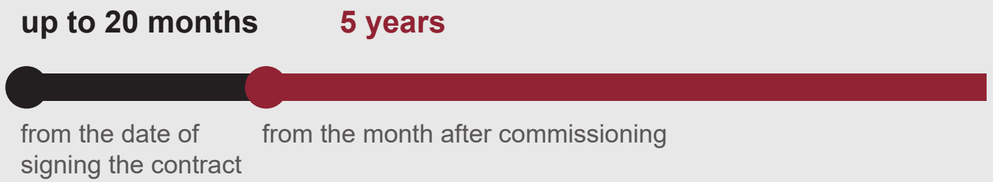
- Payment for the capacity development service: the difference between the bid price and the market reference price
- The service is paid only during peak hours: Jan–Feb, Mar, Nov–Dec 08–11 and 16–20; Apr–May, Sep–Oct 08–10 and 18–21; Jun–Aug 07–09 and 19–22
- Security: 5,000 euro/MW (participation), 15,000 euro/MW (contract performance)

Total volume: 1,505 MW in four regional lots:



Terms and deadlines:

- payment for the capacity development service for 5 years from the month after commissioning
- maximum price 27.92 euro cents/kWh including VAT
- commissioning within 20 months from the date of signing the contract



Requirements for facilities:

- unit capacity of at least 10 MW, not exceeding the bid volume for the lot
- minimum equipment service life of 20 years or 100,000 operating hours
- activation time in frequency restoration reserve mode of no more than 5 minutes
- installation of engineering protection against air attack

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Thank you for your attention!

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