

Public consultation - energy security fitness check

Fields marked with * are mandatory.

1

Introduction

The EU has a comprehensive energy security framework, with the Gas Security of Supply Regulation (EU) 2017/1938 and Electricity Risk Preparedness Regulation (EU) 2019/941 as key pillars. Since their adoption in 2017 and 2019 respectively, sufficient time has passed **to perform an evaluation (fitness check)** to identify synergies within the framework and structurally internalise lessons learned from the COVID-19 and energy crises, as well as to prepare for the changing landscape due to the energy transition and Europe's phase out of Russian energy imports' dependency.

The objective of this evaluation is to evaluate the functioning of the energy security regulations, against 5 criteria:

- **Effectiveness** (how successful were the regulations in achieving its objective of ensuring preparedness, security of supply and resilience of the EU's energy system?)
- **Efficiency** (how efficient were the regulations, e.g. in terms of financial and human resources used for the changes generated by the previously mentioned regulations?)
- **Relevance** (how have the scope and objectives of the regulations remained relevant in addressing the past and current problems across the implementation period from 2017 and 2019 until now? Are they relevant in addressing future needs and problems?)
- **Coherence** (how well did the regulations work with other policy interventions and how well did specific measures in the regulations work together?)
- **EU Added Value** (to what extent did the regulations better reach the objectives, compared to what could have been reasonably expected from regional, national or local actions?)

Through this evaluation, the Commission aims at **assessing the performance of the EU's energy security framework during the energy crisis and during the energy transition**, and identify possible deficiencies, as well as synergies and efficiency gains. This could benefit the ongoing sectoral integration, as well as reduce administrative burden. The assessment

will also look at how the cooperation with neighbours worked, in particular with Energy Community contracting parties.

Besides evaluating how the EU's energy security framework functioned in the past, this questionnaire **looks at the future** by considering the dynamic changes ongoing in the EU's energy landscape, such as new challenges brought by diversification of gas suppliers to non-Russian suppliers, decarbonisation, climate change adaptation and electrification.

This public consultation is structured in **two main sections**: one section with **general questions on energy security** for all respondents, and a **second section with more specific and technical questions**. The section with specific questions is divided into three subsections: (1) on the whole energy security framework, (2) on security of gas supply, and (3) on security of electricity supply. Respondents may choose to answer those subsections of the questionnaire that are of interest to them.

2 About you

* 1 Language of my contribution

- Bulgarian
- Croatian
- Czech
- Danish
- Dutch
- English
- Estonian
- Finnish
- French
- German
- Greek
- Hungarian
- Irish
- Italian
- Latvian
- Lithuanian
- Maltese
- Polish
- Portuguese
- Romanian

- Slovak
- Slovenian
- Spanish
- Swedish

* 2 I am giving my contribution as

- Academic/research institution
- Business association
- Company/business
- Consumer organisation
- EU citizen
- Environmental organisation
- Non-EU citizen
- Non-governmental organisation (NGO)
- Public authority
- Trade union
- Other

* 3 First name

Flora

* 4 Surname

Witkowski

* 5 Email (this won't be published)

flora.witkowski@caneurope.org

* 9 Organisation name

255 character(s) maximum

Climate Action Network (CAN) Europe

* 10 Organisation size

- Micro (1 to 9 employees)
- Small (10 to 49 employees)
- Medium (50 to 249 employees)

- Large (250 or more)

11 Transparency register number

Check if your organisation is on the transparency register. It's a voluntary database for organisations seeking to influence EU decision-making.

* 12 Are you active in the energy sector?

- Yes
- No

* 13 Which energy sector?

- Electricity
- Gas
- Oil
- Other

* 14 Please specify which sector:

50 character(s) maximum

* 15 What is your segment of activity?

- Public authority
- Regulator
- Producer
- TSO
- DSO
- RCC
- Trader
- Shipper
- Retailer
- Aggregator
- Storage operator
- Energy exchange
- Other

* 16 Please specify which other segment of activity:

* 17 Country of origin

Please add your country of origin, or that of your organisation.

This list does not represent the official position of the European institutions with regard to the legal status or policy of the entities mentioned. It is a harmonisation of often divergent lists and practices.

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| <input type="radio"/> Albania | <input type="radio"/> Dominican Republic | <input type="radio"/> Lithuania | <input type="radio"/> Saint Vincent and the Grenadines |
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- Belgium
- Belize
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- Bhutan
- Bolivia
- Bonaire Saint Eustatius and Saba
- Bosnia and Herzegovina
- Botswana
- Bouvet Island
- Brazil
- British Indian Ocean Territory
- British Virgin Islands
- Brunei
- Bulgaria
- Burkina Faso
- Burundi
- Cambodia
- Cameroon
- Canada
- Cape Verde
- Cayman Islands
- Central African Republic
- Chad
- Germany
- Ghana
- Gibraltar
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- Greenland
- Grenada
- Guadeloupe
- Guam
- Guatemala
- Guernsey
- Guinea
- Guinea-Bissau
- Guyana
- Haiti
- Heard Island and McDonald Islands
- Honduras
- Hong Kong
- Hungary
- Iceland
- India
- Indonesia
- Iran
- Iraq
- Ireland
- Montenegro
- Montserrat
- Morocco
- Mozambique
- Myanmar/Burma
- Namibia
- Nauru
- Nepal
- Netherlands
- New Caledonia
- New Zealand
- Nicaragua
- Niger
- Nigeria
- Niue
- Norfolk Island
- Northern Mariana Islands
- North Korea
- North Macedonia
- Norway
- Oman
- Pakistan
- Palau
- Palestine
- Spain
- Sri Lanka
- Sudan
- Suriname
- Svalbard and Jan Mayen
- Sweden
- Switzerland
- Syria
- Taiwan
- Tajikistan
- Tanzania
- Thailand
- The Gambia
- Timor-Leste
- Togo
- Tokelau
- Tonga
- Trinidad and Tobago
- Tunisia
- Türkiye
- Turkmenistan
- Turks and Caicos Islands
- Tuvalu
- Uganda

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18 This public consultation is structured in four sections. Apart from the section containing general energy security questions (for all respondents), which other sections do you wish to answer (if any)?

- Specific questions on the energy security framework
- Specific questions on Gas Security of Supply
- Specific questions on Electricity Security of Supply

The Commission will publish all contributions to this public consultation. You can choose whether you would prefer to have your details published or to remain anonymous when your contribution is published. **For the purpose of transparency, the type of respondent (for example, 'business association,**

'consumer association', 'EU citizen') country of origin, organisation name and size, and its transparency register number, are always published. Your e-mail address will never be published. Opt in to select the privacy option that best suits you. Privacy options default based on the type of respondent selected

*20 Contribution publication privacy settings

The Commission will publish the responses to this public consultation. You can choose whether you would like your details to be made public or to remain anonymous.

Anonymous

Only organisation details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and your contribution will be published as received. Your name will not be published. Please do not include any personal data in the contribution itself if you want to remain anonymous.

Public

Organisation details and respondent details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and your contribution will be published. Your name will also be published.

I agree with the [personal data protection provisions](#)

3 General questions on energy security

Energy security is the ability of an economy to ensure the balance between energy supply and energy needs across different timeframes and the ability of the system to **react to sudden shocks** (resilience) supported by the underlying energy infrastructure. Energy security also has a strong **international dimension**, given that the EU depends on energy imports from third countries.

While the fundamentals are well-functioning and well-interconnected energy markets and energy efficiency efforts, the EU has also developed a **robust energy security framework** relying on: oil emergency stocks, gas security of supply and storage, electricity risk-preparedness, offshore safety, critical infrastructure protection, and cybersecurity.

The energy crisis caused by Russia's unprovoked and unjustified military invasion of Ukraine has shown how external energy dependencies of the EU can be weaponized. It was a stark reminder of how **energy security is a key building block of a resilient, future-proof and**

competitive economy.

Besides, decarbonisation and electrification will bring new energy security challenges. Increasing energy system integration increases the risk of cascading **cross-sectoral** failures, in particular between gas and electricity sectors. In 2023, natural gas notably accounted for around 15 % of EU electricity generation, while in the future substantial volumes of electricity will be required for the production of hydrogen through electrolysis.

This section aims at collecting feedback regarding the functioning of the current EU energy security framework, and its possible future evolution.

21 How would you grade the functioning of the current EU energy security framework?

22 Please elaborate your choice:

The greatest challenge to the EU's energy security is an over-reliance on fossil fuels. That's why an essential lacking element of the energy security framework are fossil fuel phase out dates and a binding fossil gas phase out framework, based on criteria regarding climate and environmental impact, due diligence and human rights and security of supply. The emergency gas demand reduction measures adopted by Member States during the crisis with Regulation (EU) 2022/1369 should be used as a regulatory basis to gradually achieve a full gas phase out across sectors by 2035.

The current energy security framework is not adapted to the climate emergency and to the challenges of the energy transition. The concept of energy security as it has been developed so far is built for a fossil based-economy, not taking into account the impacts of a world facing climate crisis, various geopolitical instabilities, scarce resources, aging energy infrastructure, etc. The energy security framework needs to acknowledge that climate change itself will be one of the most important root causes of energy insecurity, and that the best way to address it is by including climate mitigation measures into the energy security framework (i.e strengthen the role played by domestically produced renewables, flexibility, and energy demand reduction and efficiency). The concept of energy security relying too heavily on oil emergency stocks or gas security of supply and storage measures is now outdated, and the energy security fitness check along with the revision of the gas and electricity security of supply regulations are welcome opportunities to update the definition and re-align the security framework with climate and social imperatives to answer to the new threats created by climate change. In particular, the energy crisis caused by Russia's unjustified invasion of Ukraine in 2022 revealed some major weaknesses and lack of functioning of the EU's energy security framework:

- 1) Europe's over-reliance on fossil fuels/gas/nuclear fuel imports, be it from one major supplier (Russia) or be it diversified from different suppliers (as it is now, with increased US LNG imports in a politically unstable context).
- 2) The lack of structural energy and gas demand reduction measures aligned with the need to phase out fossil fuels (coal by 2030, fossil gas by 2035, oil by 2040), to reach a 100% renewable energy system and climate neutrality by 2040.
- 3) The lack of consumer/ citizen protection facing the volatility of gas prices, causing the high energy prices and leading to increased energy poverty.
- 4) The lack of European coordination on the future energy needs projections and related needed infrastructures, especially for the EU's import needs assessments, including for hydrogen. The lack of independent overview or coordinated infrastructure build out is leading to an uncontrolled infrastructure over-expansion, especially fossil gas infrastructures (LNG import terminals) strengthening the dependency on fossil fuels and creating stranded assets, while diverting money from investments needed for the take off of renewable energy.
- 5) The lack of European coordination and development of interconnection points and cross-border infrastructures, minimizing import infrastructures
- 6) The lack of transparency on the EU gas market, leads to inaction and finger pointing by Member States allowing the purchasing of problematic sources of gas to continue without any accountability for big energy companies and Member States. In an ideal world, MS would know the origin of the gas going through each entry point and cross border pipeline, that includes flows in individual pipelines that have been aggregated together into a virtual interconnection point. MS should also publish the origin of the gas that it consumes on a monthly and yearly basis.

* 23 Which of the following objectives do you consider the most important for the EU energy security architecture?

between 1 and 5 choices

- Diversification of energy sources, suppliers and routes

- Making the most of existing infrastructure
- Physical protection of critical energy infrastructures against man-made attacks
- Strengthen the use of energy storage (electricity, gas, liquid fuels, heat) for energy security
- Investments in domestic decarbonised energy system
- Allocating the costs of energy security fairly
- Enhancement of interconnections and smartening of infrastructure between Member States
- Resilience of energy infrastructure, e.g. to climate change
- Cybersecurity
- Securing energy-related supply chains
- Energy demand response and reduction
- Phase-out of Russian fossil fuel supply
- Preparedness (assessment of risks and formalisation of emergency plans)

24 Please elaborate your choice:

All of the above mentioned objectives need to be addressed with strong environmental and biodiversity protection measures. In particular:

--Energy demand response and reduction: The cheapest and the most reliable energy is the one we do not use at all. Energy demand reduction is a key pillar of the energy transition as recognised by the Energy Efficiency Directive (EED) and the establishment of a final and primary energy demand reduction target of 11.7% by 2030. The European Commission should include the achievement of this target in its energy security framework and also establish a new energy savings target of at least 40% for final energy and 50% for primary energy reduction by 2040.

--In relation to fossil gas demand reduction, the Council adopted emergency gas demand reduction measures in 2022 (Regulation (EU) 2022/1369), which substituted 65 bcm of Russian gas in 2023 according to the Commission. Member States overachieved on their voluntary 15% gas demand reduction objective, to reach 19% through a combination of measures mainly in the industry and housing sectors. The current Gas Security of Supply Regulation however, does not mention the continuation of these fossil gas saving measures and the emergency Regulation itself (EU) 2022/1369 has been replaced by a simple recommendation. A framework showing a phase out trajectory for fossil gas across sectors (industry, buildings, power) combined to the gradual gas demand reduction measures should be enacted as a mandatory requirement.

-- Phasing out Russian fossil fuel supply as a first step towards a full phase out of fossil gas. The revised energy security framework and the Gas Security of Supply Regulation should include the Roadmap to achieve full phase out from Russian energy imports by 2027 that Energy Commissioner Jorgensen will present during the first 100 days of his mandate. The diversification of supply strategy implemented by the EU is no solution to the energy security crisis (see more details on the LNG security risks in question 35) as it only creates new dependencies towards new suppliers. To genuinely address the EU's fossil dependence and energy insecurity, phasing out Russian fuels can only be a first step towards a full phase out of fossil gas.

-- Nuclear power does not make the EU energy independent. The EU has to import 99.5% of its natural uranium used to produce nuclear power. Approximately 23% of the uranium needed by operators in EU Member States came from Russia, 21% from Kazakhstan and 14,5% from Niger in 2023. Besides, the EU is dependent on Russia for uranium enrichment services in 26% of cases. By 2040, up to 42 % of Hungary's and 37 % of Bulgaria's electricity could come from Russian-made reactors. Cutting ties with the Russian nuclear sector, waving new nuclear power plants projects and phasing out nuclear power will therefore be key for the EU's resilience in the future.

-- The objective to enhance interconnections and smartening infrastructure between Member States is key to energy security because lacking cross-border connectivity is a bottleneck. Distribution grids are a further frontier alongside enhancement (upgrade + expansion) of transmission grids. For example, Germany lost 3.1 bn EUR and 19 TWh of electricity in 2023 basically because of lacking grid connections.

-- The need to make the most of existing infrastructure, through energy demand reduction measures including binding gas demand reduction is important to avoid the risks of no coordinated infrastructure development across the EU: lock-in effect in fossil gas dependence, stranded assets, wasted money otherwise needed for the transition towards renewables, etc.

* 25 How do you think electrification has already impacted and can further impact EU energy security in the medium term? Was the EU energy security framework sufficient to address such impacts and if not, what improvements you think are needed?

Electrification has already positively impacted energy security through supporting the integration of home-grown renewables to provide electricity and limiting gas import needs. In the medium term, electrification can further support energy security, but only if it is a renewables-based electricity comprised of 4 key aspects:

- 1) rapidly deploying renewables to supply cheap, homegrown, and efficient electricity,
- 2) applying ambitious demand reduction to ensure new electricity is well used and to limit import needs,
- 3) early fossil-fuel phase out dates to ensure gas imports are not the driver of new growth electricity, locking in dependency and emissions and to phase out aging coal fired power plants at risk of increase failures and outage, and
- 4) electrify the demand of both industry and households

*26 Are there energy security risks associated with possible future electricity imports from third countries?

- Yes
- No
- No opinion

27

To what extent are there energy security risks associated with possible future electricity imports from third countries?

An interconnected system within the EU and with its neighbors will ensure electricity can be shifted from areas of high production to regions with high demand, more effectively using renewable energy and ensuring security of supply. It is expected that electricity trade between third countries such as the UK, Norway and Switzerland will continue, taking advantage of renewables and existing hydro storage. In the Western Balkans, interconnection between these countries and with the EU can provide benefits, but efforts must be made to ensure that consumers are not negatively affected by prices in the region. Europe should seek to support the use of renewables in North Africa but should prioritize the use of that electricity to support development and decarbonisation of those countries, and avoid building a neo-colonial import system. Additionally, over-dependence on North Africa for electricity imports may prove a risk to security of supply in Europe, as the European over-reliance on gas imports has proven to be, as energy exports can become vulnerable to geopolitical events and can become politicized as seen with Russia's weaponization of gas exports towards the EU.

*28 Are there improvements to the EU energy security framework that are needed to prepare for the ongoing transition (towards e.g., more electrified, renewable-based and integrated EU energy system)?

- Yes
- No
- No opinion

*29 Can you please elaborate?

The energy security framework needs to be revisited and updated because of a changing energy system. Historically, the argument of energy security was largely developed during a time of an old, centralized, fossil fuel paradigm. The downside of this paradigm is its vulnerability to geopolitical shocks and volatility of energy commodity prices. It is now time to recognize the role and impact of the climate crisis on energy insecurity, and acknowledge that a fossil fuel based market is a vector of dependence, vulnerability and instability. In that regard, the current framework will need to be realigned with the recently adopted principles, objectives and laws under the Fit for 55 Package and European Green Deal, in particular:

--Mainstreaming the energy efficiency first and gas demand reduction first principles in the energy security framework through the implementation of structural demand reduction measures. The fossil gas demand reduction measures implemented by Member States have proven effective to substantially reduce Russian gas imports (see more on that under question 24, 40), but they are one of the blind spots of the gas SoS Regulation (see more on that under question 86, 88 and 90) that needs to be addressed. Continuing energy savings (implementation of the revised Energy Efficiency Directive and Energy Performance of Buildings Directive as well as setting an ambitious 2040 energy efficiency target) - and especially gas savings- are key to the future energy system and its security, and are better aligned to the structural gas reduction kick-started by the energy transition.

--Revise the energy security framework in the light of the climate objectives and consumer protections measures, also thereby strengthening the framework to respond to long-term supply shocks. This implies a revision of the risk assessments and preventive/emergency plans taking into account the climate change consequences, but also protecting customers in the event of difficult climatic conditions or severe disruptions of the gas supply. This can also be done by formulating new standards for the infrastructure standard and the gas supply standard. Overall, the solidarity measures will need to be updated in the light of the 2022 crisis.

--Improve the EU level coordination, especially for neighboring member states to enhance interconnection points and solidarity across MS and to avoid over-expansion of fossil gas infrastructure, stranded assets and fossil gas lock-in effects

--Align with the electrification and renewable energy objectives. Energy security needs to be re-defined in light of a future energy system that will be more decentralized, distributed, electrified, and highly flexible, as an energy system that uses 100% renewable energy. The more the ambition-level can be raised for a flexible, fully renewables-based, electrified energy system, the less pressures there are to rely on emergency measures or energy imports. The more decentralized a future RES system is, the more difficult it is for an adversary to challenge/sabotage it. Decentralized solar and decentralized wind are the basis for such diversification.

--Community energy projects will be an essential element of this framework, strengthening resilience and fostering a stable, inclusive, and secure energy future for all by reducing vulnerabilities by lessening dependence on energy imports and fossil fuels. Instead of relying on emergency measures, energy communities build energy security from the ground up, diversifying production and buffering against global disruptions and geopolitical turmoils.

* 30

What role can decarbonised and renewable hydrogen, including in the form of liquid fuels, play for future EU energy security?

Only a very minor role. According to the PAC scenario, the EU's future needs of hydrogen can be provided by renewable and locally produced hydrogen only.

--The reliance on so-called decarbonised or 'low carbon' hydrogen, fossil-based with Carbon Capture and Storage (CCS) or produced from nuclear energy, diverts critical attention and financial resources from hydrogen produced from renewable energy (solar and wind), which should be the primary and only focus. Incentivizing a decarbonised hydrogen market could potentially create the same risks, dependencies and uncertainties as our current system based on fossil gas is facing. Furthermore, decarbonised hydrogen fails to capture all CO₂ emissions during its production process; even worse the methane leakage during the exploitation and transport phase will not even be mitigated, making the switch to hydrogen as an energy carrier to decarbonise our industry counter effective.

--It is of primary importance for the EU energy security to strictly limit the use of hydrogen only to those very sectors where there are no alternatives: the hard to abate or hard to electrify sectors (such as steel production or long distance transport). Hydrogen produced from renewables will be a scarce resource and should be used only in those sectors where no other more efficient solutions exist, in order to have a reliable balance between needs and supply projections (see the hydrogen ladder).

--Renewable hydrogen as a way to avoid curtailment and store renewable energy could help deliver on energy security but potential, demand, and curtailment needs to be assessed properly to avoid oversized assumptions; ensuring that only renewable hydrogen plays a role for the storage options, not decarbonised hydrogen.

--In that perspective, to strengthen the hydrogen market security, an independent hydrogen needs assessment would be required, to increase certainty and security of reliable demand and supply projections. In parallel, better EU coordination is needed to map the different infrastructure projects already in the making and ensure that only the necessary ones are incentivized. A clear definition of "hydrogen-ready" pipelines or other infrastructure is needed to avoid greenwashed projects to be developed creating a risk of a lock-in effect into grey or decarbonised hydrogen use with the linked risks of fossil gas supply insecurities. A secure hydrogen market will also need to take into account the GHG impact of hydrogen emissions, a gas with a warming potential more than 30 times higher than carbon dioxide over a 20 year time period; and potential hydrogen leaks that can occur across the entire supply chain.

--If renewable hydrogen is imported from third countries, high social and ecological standards must be guaranteed. The involvement of local communities, the generation of regional value creation and the avoidance of water scarcity are exemplary in this regard and also ensure that the supply chain is set up in a resilient manner. Finally, there must be no cannibalization of the local production of renewable electricity.

* 31 What are the potential risks to hydrogen supply security and to what extent should they be mitigated? How do you see the role of hydrogen imports in the future? Should the EU energy security framework play a role?

There are no needs for hydrogen imports according to the PAC scenario, thus increasing the security of hydrogen use. In case hydrogen imports are envisaged, the only way to ensure a secure and sustainable hydrogen for the EU -avoiding past mistakes from fossil-based production and linked insecurities- is to focus on renewable hydrogen imports only, with strict sustainability requirements and avoiding neocolonial import systems.

It is of utmost importance to have a neutral needs assessment of hydrogen use in those hard to abate sectors to ensure supply side overexpansion of production and infrastructure. The Commission has revised hydrogen use figures in its 2040 Climate Target Impact Assessment (February 2024) down from 20 Million tonnes to 3,5 Mt. These numbers need to be included as well in TYNDP infrastructure planning to avoid over optimistic build out of hydrogen infrastructure giving a lifeline to the gas industry.

Given international hydrogen supply chains risk having a similar structure to current fossil gas supply chains, the problems and risks linked to it overlap in part.

One of the current biggest risks linked to hydrogen imports are the over optimistic yet very blurry assumptions that a) enough both renewable and decarbonized hydrogen supply will be available b) there will be adequate import and transport infrastructure of this hydrogen and c) which form it will be (hydrogen, ammonia?) imported and where will crucial demand be. All these questions have not been fully answered, thus making any reliance on hydrogen risky at this stage.

Examples like the one of Mozambique with LNG (where LNG plans are linked to rising terrorism in the region) risk being repeated through hydrogen import projects, which can come with severe impacts on local communities (eg. water scarcity or destruction of a natural park, biodiversity threats, threat of livelihoods due to mega-dam plans as in Chile, Namibia and the Democratic Republic of Congo) - ultimately also putting Europe's hydrogen supply security in danger. Not to mention the risk of fueling climate change with 'decarbonized' blue hydrogen which is based on fossil fuels and has been found to produce even more greenhouse gasses than burning gas directly. An over-reliance on hydrogen also risks requiring more fossil gas than needed in(to) the future, or creating a lock-in into fossil gas use, as the fallback option if the hydrogen economy fails to form in a meaningful, efficient way. This would mean continued use of fossil based hydrogen (as 99% of the hydrogen produced today)- which then aggravates all security risks outlined in the sections on fossil gas/LNG.

* 32 Do you think that the current EU energy security framework has sufficiently taken into account climate risks, such as energy disruptions due to heat and drought or damage to energy infrastructure due to extreme weather events?

- Yes
- No
- No opinion

33 Please provide concrete examples and/or suggestions how this can be achieved.

Nuclear power units across Europe have been proven as unreliable in providing power when needed. Future climatic conditions, such as heatwaves, droughts, flooding and rising sea-levels only increase the likelihood of future nuclear power plant disconnections and pose further security risks. In 2022, on average French nuclear reactors had 152 days with zero-production. Over half of the French nuclear reactor fleet was not available during at least one-third of the year, one-third was not available for more than half of the year, and 98% of the year 10 reactors or more did not provide any power for at least part of the day.

This is another reason to limit the role of nuclear power in the future EU energy mix. Most importantly, no EU funds should go into the development or deployment of nuclear power.

* 34 Liquefied Natural Gas (LNG) has become an increasingly important gas supply source (represents now ca. 50% of EU imports). Do you see any risks associated with the increased reliance on the global LNG market?

- Yes
- No
- No opinion

35 Which concrete risks do you see (e.g., reliance on unstable democratic countries, exposure to global markets fluctuations, infrastructure bottlenecks or oversize, etc.)? How should they be addressed?

The countries the EU currently relies on heavily for LNG are the US (with the biggest share providing currently close to half of all LNG imports), followed by Qatar and Russia.

-US: The recent election of Donald Trump in the US risks creating further uncertainty, due to threats of blanket tariffs on European goods - counter-tariffs of which can also impact US fossil gas imports. Around 90% of fossil gas in the US is extracted via fracking, which together with the complex, energy heavy and leak-prone supply chain of LNG heightens the risk of runaway climate change. The Permian Basin, where much of the US LNG is sourced is considered the biggest carbon bomb globally.

-Qatar, the EU's second biggest LNG supplier has been heavily criticized in the past and does notably raise a risk due to reliance on an intransparent, authoritarian regime. Even more so as Qatargate has revealed the illegal attempts by the Qatari government to influence the EU Parliament.

This shows how the flexibility of the LNG supply chain can be abused and can turn into a risk.

Overall, LNG cannot be seen as a supply solution, as LNG is traded on a global market, and this makes the EU gas market more vulnerable to geopolitical events, as could be seen with the price spikes on the TTF after the strikes at LNG-export facilities in Australia and the recent tensions in the Middle East. Furthermore, its production and transport aggravates the climate crisis, with high methane leakages on the LNG supply chain, strengthening as well the climate risks on the EU gas market. According to ACER, the EU's demand on LNG should have reached its peak in 2024, due to "reductions in structural gas demand driven by the EU's ambitious decarbonisation goals". Further investing into LNG import infrastructure - as for example facilitated through the German "LNG acceleration law" - or continuing to negotiate and conclude LNG MoU to increase LNG as a gas supply source is therefore nothing else but further incentivising energy security problems. In particular:

-Important amounts of LNG are still being imported from Russia through Belgium, France and Spain since 2022 and have even increased, undermining the EU's joint efforts to phase out Russian fuels. It is further fueling the Russian's war capacity in Ukraine and keeping alive all the risk patterns of the 2022 energy crisis.

-Special attention should be paid to the structure, type and duration of LNG contracts that EU and EU member-states commit themselves to. In case of long-term commitments to LNG suppliers, they could become a future bottleneck in the EU energy transition aligning with the Paris Agreement. More transparency is also needed on booked LNG capacities on the markets to ensure the traceability of the supply chain. In the case of Russian LNG this could aid the full phase-out by 2027 or even sooner as compared to the current situation were Member States can use the current lack of transparency to justify continuous Russian LNG import or transshipment.

-LNG, despite being advocated as a modular source (to natural gas pipelines), poses another type of a danger in the meaning of a fossil fuel lock-in effect and increasing the EU's fossil gas dependency. The 2022 crisis also led to a strong diversification of external gas supplies and a massive overexpansion of LNG import infrastructures: we witnessed an uncontrolled infrastructure boom across the EU, with 8 new terminals and 4 expansions already operational in 2023; and 13 new projects under construction (source). These new infrastructure build outs are not aligned with the structural declining gas demand: total LNG total import capacity is projected to reach 408 bcm in 2030, while gas demand is expected to drop by 184 bcm in 2030, according to ACER, if the EU follows its objectives of the REPowerEU plan (or 95 bcm by 2030 according to the PAC scenario).

Given the costs of the energy transition, it is very important to avoid diverting investment from the key infrastructure enablers of future energy infrastructure (wind, solar).

-The deployment of LNG poses a risk of delay in the decommissioning of fossil gas infrastructure, as a transition risk, obstructing systemic change for climate security.

-LNG is inherently also an expensive energy carrier to purchase due to energy loss during liquefaction and transportation, that is why gas in Japan was historically speaking always more expensive than in the EU and why gas prices in the EU won't go back to low prices from before the invasion of Ukraine. LNG is thus not a solution to keep the EU's energy prices for industry competitive with the global market, only Renewables can deliver on the promise

* 36 Are there specific energy security measures in other countries (US, China, Japan, Canada, Switzerland, UK, etc.) that you would like to see mirrored in the EU's framework?

- Yes
- No
- No opinion

* 38 Would you see enhancing international cooperation with close partners as beneficial for EU energy security?

- Yes
- No
- No opinion

39 Please elaborate, if appropriate:

Yes but limited. See answer to question 27

* 40 What is the additional value for EU energy security resulting from EU legislation, compared to what could reasonably have been achieved (in terms of effectiveness and efficiency) by Member States acting at national level?

The EU has an important role to play in shifting the current energy security architecture towards a more sustainable and socially just framework. Enhanced European coordination is needed: while energy security is often seen as a national issue, the lack of energy security affects EU citizens across borders and the transition towards a renewable energy system will require cross-border cooperation and increased interconnections. A coordinated European re-definition of energy security should also be used as an opportunity to prioritize the implementation of the European Green Deal and strengthen the ambition on the 2040 climate objectives. The fitness check should put at its core the "looking forward" perspective, aiming to structurally integrate the decarbonisation and renewables based electrification of the EU's energy system, as guidelines for the next European policy cycle 2024-2029.

Additionally, the EU's actions and coordination in terms of gas savings have proven successful. The REPowerEU plan and the gas demand reduction measures had positive effects, curbing EU countries' gas consumption by 18% between August 2022 and March 2024. According to the Commission gas saving measures on EU- and national level, led to 65 bcm reduction of Russian gas imports in 2023. However, in the current Security of Supply Regulation, gas saving is not mentioned as a potential measure. Furthermore, the gas demand reduction measures have only been reconducted as non binding recommendations. The Commission needs to fill an important gap, by integrating the effective gas demand reduction measures into the revision of the gas security of supply regulation - and incentivize all member states to continue gas saving efforts. Several Member States are calling for putting the "energy efficiency first principle" through gas demand reduction as a key measure to enhance energy security.

* 41 Has the EU level action and coordination become more important or less important for energy security due to recent developments, e.g. due to the rising importance of LNG, the enhanced cross-border infrastructure and the joint phase out of Russian gas, or other?

- More important
- Equally important
- Less important
- No opinion

42 Please elaborate:

The EU's actions and coordination has become more important, but only on specific issues. While overall coordination on EU level can be a positive development (see response above) and the joint acting on Russian gas imports has shown impressive results so far, the way in which coordinated action concerning LNG imports has happened raises questions.

The EU Energy Platform, established for LNG demand aggregation and to facilitate purchasing, failed to look at important factors, including climate impact of the gas in question, human rights and support of questionable regimes etc.

An advisory group for the Energy Platform was established on request of oil and gas majors, and consisting of only industry players, excluding civil society. This has been questioned/criticized by the EU Ombudsman and received heavy criticism by Civil Society Organizations, who say that it gives fossil fuel majors who helped create the EU's dependence on gas in the first place a privileged access to decision makers. It's problematic as the companies in the expert group are the same that benefit from gas imports into the EU.

On the other side, there seems to be a lack of coordination with differing and often contradictory claims and aims among Member States, which have in the past few years led to an excessive build out of LNG infrastructure, out of touch with import realities and security necessities.

In this respect, EU coordination could be valuable and provide a reality check as well as avoid redundancies.

Unchecked infrastructure build out, risking the creation of stranded assets with little to no contribution to energy security, has e.g. been the result of several EU countries claiming to become gas hubs, or several new LNG facilities built/expanded in different member states (Germany, Greece, Croatia) all claiming they will benefit one same country (e.g Austria, Hungary) to get off Russian gas.

The EU could play an important coordination role in collecting these claims and providing a reality and energy security check to those.

Coordination could also have helped secure energy supply while avoiding excess costs in cases like the Croatian case: In a move that cost taxpayers dearly, in 2023 Croatian state-owned electricity company HEP bought too much gas that it then couldn't store. It then had to sell that gas for a price of up to only about 1 /47th of the price to a Croatian private gas company, PPD.

* 43 Has the EU's energy security policy tackled the needs of EU citizens and/or businesses (e.g., in terms of energy availability, affordability, etc)? Will it continue to be relevant for them in the next decade?

In the next decades, energy security needs to be updated to align better with the changing energy paradigm and acknowledge citizen protection.

Recent crises have shown that climate actions in key end-use sectors are crucial to protect citizens and businesses. The pressure to build LNG supplies at a haste, as a fossil fuel source, and energy prices spikes

after Russia's attack on Ukraine prove that the EU and EU Member States were not prepared or resilient enough. As a note, energy security is often traditionally nationally framed, e.g. through security of supply, with protective agencies, and a focus on critical infrastructure(s). When it comes to buildings for instance, it is important to acknowledge that action (especially reduction of energy demand) has been worryingly slow in the past decades. This has left, and continues leaving millions of households to deal with sky-rocketing energy bills, which coupled with the rapidly decaying EU building stock is increasing the phenomenon of energy poverty (felt during the winter and also the summer because of rising temperatures linked to climate change). It is important to note that behavioral measures such as setting the indoor heating temperature at 19°C cannot be considered enough when more and more households are forced to switch off their heating system during the winter because of very high energy bills (mixed with very low income levels). A more structural response is needed to ensure that energy demand of homes is lowered and that renewable-based heating and cooling technologies are deployed in the most affordable and rapid way possible. Support implementation of EU Directives such as the Energy Performance of Buildings Directive, Energy Efficiency Directive and Renewable Energy Directive amongst others will need to feature more strongly in the overall architecture.

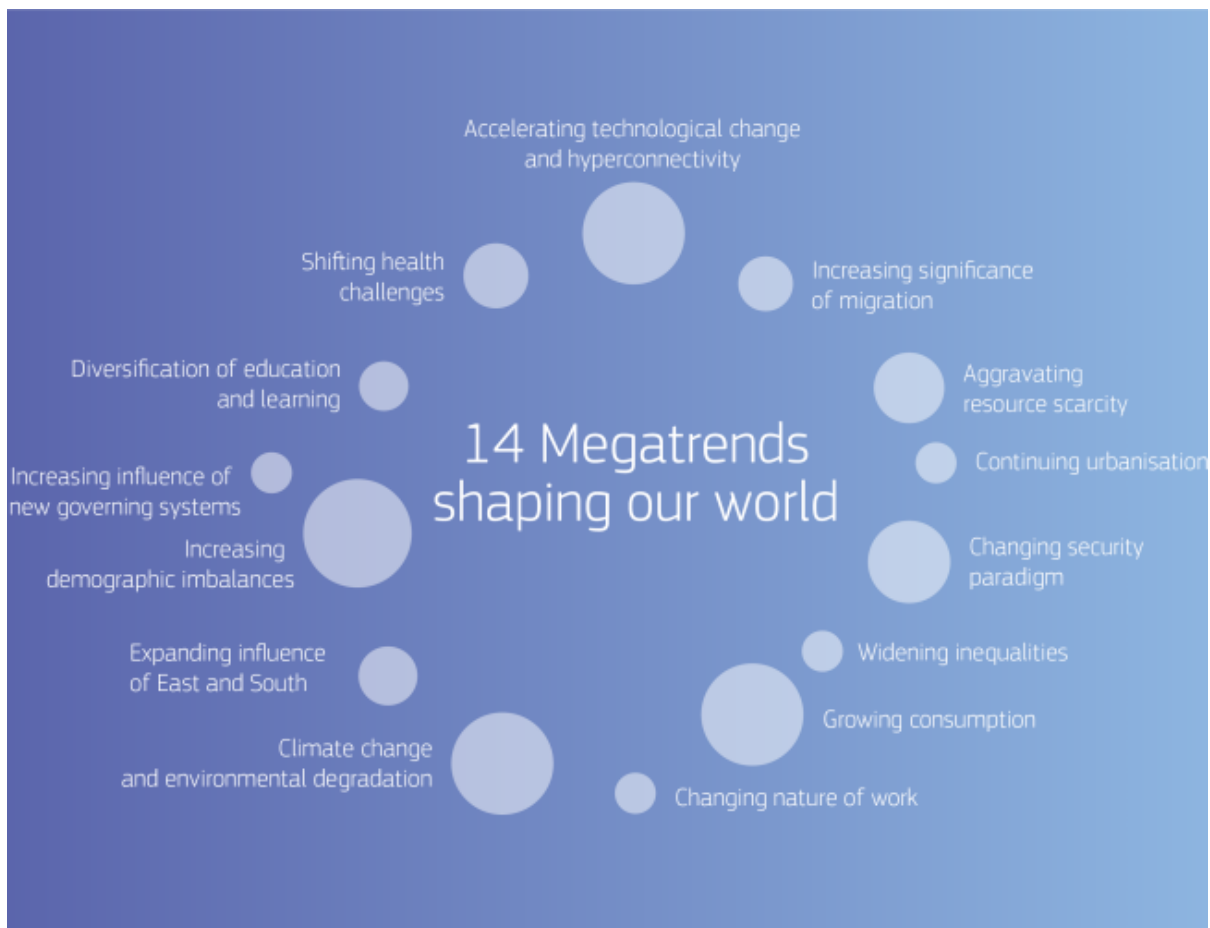
For times of crises, citizens should be protected better against energy price hikes, which put citizens in 2022 to bear a heavy burden, and caused household energy savings to be deployed, which really should be a last resort - while fossil fuel corporations made billions and billions in profit, which they protected with claws and teeth (see i.e. lawsuit against EU windfall tax) while failing to invest these profits into cleaning their portfolios and reach emissions reductions.

In this respect it is crucial to mention that the EU's energy security policy has not succeeded to address the issue of conflicts of interest. Tackling this issue would improve real energy security as for the past decades the heavy involvement of the fossil fuel industry has resulted in policies which tied the EU more firmly to gas, watered down climate ambition and energy efficiency and renewables measures which not only would have brought the EU's emissions and fossil fuel demand down but also would have greatly addressed its import dependency. Ironically, it was exactly the same players who were given important mandates in designing the energy market, providing outlooks and assessing projects. The issue of conflicts of interest must be addressed in order to move towards real energy security.

A far more distributed and diffused view could place more serious systemic attention into the micro-level, for which an EU level coordination could be of great added value: on prosumerism, scaling up energy cooperatives (e.g. through advancing electricity market design) to sustain a more resilient system, in service of citizens and businesses, also enhancing resilience, especially in times of crises.

- * 44 The European Commission's Joint Research Centre identified [14 megatrends](#) (see figure below), which are long-term driving forces that are most likely to have a global impact in the future. For which one(s) of these megatrends do you think the EU Energy Security architecture is the least prepared and why? Please explain.

The "climate change and environmental degradation" trend. Please see previous answers for more explanations.



45 Do you have anything to add regarding the general functioning and/or the future orientation of EU energy security policy?

The future EU energy security policy must work towards the following objectives:

Establish binding fossil fuel phase out dates to end the EU's reliance on expensive, volatile and polluting fossil fuels. CAN Europe - based on its Paris Agreement Compatible (PAC) energy scenario - calls for phasing out coal by 2030, fossil gas by 2035 and oil by 2040.

Accelerate the deployment of renewable infrastructure (solar, wind, flexibility, grids, storage) and build a 100% renewables based energy system by 2040

Fully leverage energy demand reduction by ambitiously implementing the Energy Efficiency Directive and the Energy Performance in Buildings Directive and setting a new energy efficiency target for 2040, aiming to halve energy consumption.

Avoid false solutions such as new nuclear power and Carbon Capture and Storage as they are costly and too slow to deploy, risking to delay the urgently required phase out of fossil fuels.

More details can be found in CAN Europe's Energy Compass for the new European Commission:

<https://caneurope.org/content/uploads/2024/09/Energy-Compass-for-the-new-policy-cycle-2024-2029.pdf>

Please also see CAN Europe's Paris Agreement Compatible energy scenario, the PAC scenario.

The executive summary can be found here: <https://caneurope.org/content/uploads/2024/09/PARIS-AGREEMENT-COMPATIBLE-SCENARIO-2024.pdf>

The full report can be found here: https://www.pac-scenarios.eu/fileadmin/user_upload/PAC/PAC_documents/202408_PAC20_Technical_Summary.pdf

46 Are there any papers, reports or other documents that you would like to upload?

Only files of the type pdf,txt,doc,docx,odt,rtf are allowed

[e528503a-e99e-4567-8d80-f96db82ce66d/Energy-Compass-for-the-new-policy-cycle-2024-2029.pdf](#)

4 Specific questions on energy security framework

47 To what extent do you agree with the following statements? "*EU-level action has...*"

	1 (Strongly disagree)	2 (Disagree)	3 (Neither agree, nor disagree)	4 (Agree)	5 (Strongly agree)
<i>... benefitted preparedness and security of supply in the energy sector"</i>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<i>... increased coordination and transparency between Member States"</i>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<i>... reduced distortions of the market and spill-over effects in neighbouring countries"</i>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

48 Are there any inconsistencies or gaps between the Gas Security of Supply and Storage Regulation and the Electricity Risk Preparedness Regulation that emerged in past years, and which hinder the achievement of the respective objectives of these Regulations?

- Yes
- No
- No opinion

49 How could the coherence between the previously mentioned Regulations be concretely improved in the future and the identified gaps filled?

750 character(s) maximum

50 Are there strategies in place in your industry or country to mitigate the impact of an electricity crisis on gas supply, and vice versa?

- Yes
- No
- No opinion

51 Please elaborate on the strategies in place:

750 character(s) maximum

52 Are the roles and responsibilities, as well as the mechanisms to coordinate between electricity and gas sectors, effective during crises?

- Yes
- No
- No opinion

53 Why are they not effective?

750 character(s) maximum

54 Electricity and gas markets have become increasingly intertwined. Do you see the following as potential areas where regulatory synergies could be sought?

	Yes	No	No opinion
Risk assessments and scenarios	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Preventive action/risk preparedness plans	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Definitions and levels of crises	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Crisis management procedures	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Protected customers / Special protection against disconnection	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Storage measures for energy security (electricity, gases, liquid fuels, heat)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Regional cooperation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Solidarity / Assistance	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

55 Please elaborate, if appropriate:

750 character(s) maximum

56 Are there other areas, not identified in the table above, where synergies should be sought?

750 character(s) maximum

57 Do you see reasons and ways to bring the energy security frameworks for gas storage and wider energy storage closer?

- Yes
- No

58 Can you provide concrete examples?

750 character(s) maximum

59 What are the most relevant cross-sectoral or cascading risks affecting gas and electricity that should be addressed in the future (e.g. shortage of critical gas volumes for power generation, power outages affecting turbines in the gas system or boilers, or power outages affecting production of renewable/low-carbon gases)?

750 character(s) maximum

60 How could these risks be tackled in the future?

750 character(s) maximum

61 To what extent are risks associated with the further digitalization and smartening of energy networks, i.e., cybersecurity risks, sufficiently covered in terms of ensuring security of supply? Do you see a need for improvements to the EU energy security framework to tackle these risks?

750 character(s) maximum

Guidance on risks associated with further digitalization and smartening of energy networks and systems could be included in a European Commission recommendations for demand-side flexibility (similar to the ten recommendations for energy storage, issued as part of the Action Plan for Affordable Energy Prices and/or Electrification Action plan). EU coordination mitigates the risk that every country goes its own way, which is a potentially inefficient solution.

See ten recommendations here: [https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32023H0320\(01\)](https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32023H0320(01))

62 Do you see any additional or increasing role for demand-side measures in the future EU energy security architecture, on top of the already existing framework under the recently adopted Electricity Market Design?

- Yes
- No
- No opinion

63 Can you provide concrete examples that would allow to better recognize and leverage demand-side policies?

750 character(s) maximum

European Commission recommendations to unlock demand-side flexibility from businesses and households - similar to the ten recommendations for energy storage- issued as part of the Action Plan for Affordable Energy Prices and/or Electrification Action plan.

See Ember's report: <https://ember-energy.org/app/uploads/2024/04/Making-clean-power-flexy.pdf>

64 Please explain:

750 character(s) maximum

Guidance on: Making demand “smart as standard from the start”: standards to give consumers more control and choice to access electricity when it is cheaper, handling cyber-security risks, with special focus on new EVs, heat pumps, air conditioners, electrified industrial processes; Making infrastructure fit for smart electrification, with special focus on regulation that promotes system operators’ procurement of flexibility services, at all voltage levels, beyond new poles and wires (e.g. more balanced CAPEX-OPEX approach);

Bringing consumers onboard ensuring minimal disruption (via aggregators, incentives, improved uptake of dynamic price offers); Quantifying and leveraging on demand-side flexibility potential to meet flexibility needs

65 Are there any papers, reports or other documents on these issues that you would like to upload?

Only files of the type pdf,txt,doc,docx,odt,rtf are allowed

5 Specific question on Gas Security of Supply

Gas security of supply (SoS) is the ability of the gas system to guarantee the supply of gas to customers with a clearly established level of performance. At EU level, safeguards are introduced by the **Gas Security of Supply Regulation (EU) 2017/1938**, amended in 2022 by the Gas Storage Regulation and the Gas Package adopted in 2024. It relies on:

- Improved **information exchanges** and transparency via e.g. the **Gas Coordination Group**.
- EU-wide **simulations** and **risks assessments** conducted at European, regional and national levels.
- A framework for national **Preventive Action Plans** and **Emergency Plans**, to prevent and react to risks and crises.
- **Crisis management** procedures and **solidarity** safeguards in emergencies, in particular to “**protected customers**” (e.g. households).
- A policy to ensure a filling of gas **storage**.

The Commission published on 5 October 2023 a report reviewing the Regulation (COM(2023) 572). Following the most recent amendments, the Commission has to prepare a report on the implementation of the storage provisions and of the solidarity provisions of the Hydrogen & Decarbonised Gas Package by 28 February 2025. Besides informing the fitness check on the energy security framework, this public consultation intends to provide input also for that report.

A. Backward-looking

1) Effectiveness

66 Regulation (EU) 2017/1938 pursues several objectives. How would you grade its performance on the following objectives?

	1 (Very poor)	2 (Poor)	3 (Average)	4 (Good)	5 (Excellent)

Secure an adequate level of preparedness in Europe for gas supply disruptions, e.g. through assessing risks and sufficient infrastructure	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Ensure that all necessary measures are taken to safeguard an uninterrupted supply of gas, in particular to protected customers	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Enhance regional and EU-wide cooperation, including in times of supply emergencies	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

67 Have you experienced barriers or difficulties in implementing and enforcing the provisions of the Regulation?

- Yes
- No
- No opinion

68 Which provisions proved difficult to implement and why?

750 character(s) maximum

Problems of conflict of interest because of the governance structure of the SoS Regulation, especially with the Gas Coordination Group (GCG, article 4 SoS) and the responsibilities they have in the gas supply and infrastructure scenarios. No involvement of civil society is problematic.

69 Have there been any unexpected and/or unintended effects caused by the implementation of this Regulation, which hindered progress towards these objectives?

- Yes
- No
- No opinion

70 Which effects were there and what parts of the Regulation caused these effects?

750 character(s) maximum

The gas storage targets: obligation of gas storage for MS who want to phase out gas or have advanced gas phase out objectives and pathways- see for example the situation in the Netherlands.

71 To what extent do you agree that the following specific provisions have been effective in ensuring preparedness, security of supply and/or resilience?

	1 (Not effective at all)	2 (Marginally effective)	3 (Moderately effective)	4 (Effective)	5 (Very effective)
Gas Coordination Group	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Infrastructure standard and bi-directional capacities	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Supply standard and protected customers	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Common Risk Assessments	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
National Risk Assessments	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Preventive Action Plans and Emergency Plans	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Crisis management	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Crisis levels	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Solidarity provisions	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Information exchange requirements under Article 14	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Storage targets	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Annual storage trajectories set by the Commission	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Storage system operators' certification	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Demand reduction and EU-alert	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Cooperation with Energy Community Contracting Parties	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

72 Do you wish to elaborate on any of the points above? If so, please indicate to which point(s) you are referring to.

750 character(s) maximum

Effectiveness of the gas demand reduction measures: see answer under question 40.
Points on the storage targets: see answer question 70
Point on the GCG: see answer question 68

73 What do you consider the main strengths and weaknesses of the Storage Regulation, in particular the 90% storage targets, the trajectories, burden sharing, the certification procedure, the sunset clause in 2025 of the storage provisions?

750 character(s) maximum

We have seen that gas storage play a crucial role in the current gas system but with the global decrease in gas demand there is less need for gas storage in the future, therefore a storage obligation or putting too much burden on this is not needed anymore. Market flexibility should be incentivised rather than storage.

2) Efficiency

74 What were the costs and benefits of the implementation of the Gas SoS Regulation (including the storage and solidarity amendments introduced by the Storage Regulation and the Hydrogen and Decarbonised Gas Package) for your organization? If possible, please provide both quantitative and qualitative elements.

750 character(s) maximum

Overall: more involvement of civil society, and especially concerned stakeholder (consumer protection organization). But these measures are still not strong enough and should be prioritized in the revision of the SoS regulation, to avoid the conflict of interests with the gas industry

75 To what extent have the following provisions created **disproportionate** burden (e.g. administrative, financial or other burden)?

	1 (Negligible)	2 (Low)	3 (Average)	4 (High)	5 (Very high)
Gas Coordination Group	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Infrastructure standard and bi-directional capacities	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Supply standard and protected customers	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Common Risk Assessments	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
National Risk Assessments	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Preventive Action Plans and Emergency Plans	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Crisis management	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Crisis levels	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Solidarity provisions	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Information exchange requirements under Article 14	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Storage targets	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Annual storage trajectories set by the Commission	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Storage system operators' certification	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Demand reduction and EU-alert	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Cooperation with Energy Community Contracting Parties	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

76 Do you wish to elaborate on any of the points above? If so, please indicate to which point(s) you are referring to.

750 character(s) maximum

77 How can the Regulation's reporting and monitoring requirements be simplified? Have the current reporting and monitoring requirements or frequency avoided unnecessary duplication or overlapping responsibilities (e.g. regarding risk assessments and plans)?

750 character(s) maximum

3) Relevance

78 To what extent were the provisions of the Gas Security of Supply Regulation relevant in addressing the gas supply challenges and disruptions experienced by the EU since its implementation? Please elaborate your answer, e.g. by making explicit reference to the 2022/2023 energy crisis.

750 character(s) maximum

The solidarity measures and the coordination with energy communities were interesting tools. But most of the relevant measures were the emergency measures adopted outside of the gas SoS regulation: the gas demand reduction measures, the windfall profit tax, the gas price cap

79 How well adapted is the Gas Security of Supply Regulation to technological or scientific progress, and to the environmental/climatic challenges that EU will face?

750 character(s) maximum

Not adapted, for example the risk assessment does not take into account the impacts of climate change on the gas production but also regarding the exposure of infrastructures. A better assessment of the climate, social and geopolitical risks need to be added, in the perspective of fossil gas' contribution to climate change and the EU's dependence on it.

4) Coherence

80 To what extent is the Gas Security of Supply Regulation aligned with other EU policy goals?

750 character(s) maximum

Lack of alignment with climate goals and need to adapt to the structurally reducing gas demand.
Also not aligned with the methane regulation: the supply standard (article 6 SoS) for example could be adapted to take into account the MRV obligations for imported gas sources under the methane regulation.

81 Did some provisions within the Regulation prove to be inconsistent with one another?

- Yes
- No
- No opinion

82 Please give concrete examples:

750 character(s) maximum

The implementation of the energy efficiency first principle, which is mentioned in the text, is lost through the overall logic of a gas based energy security for the market, while nowadays the security is better achieved and the market is transitioning towards renewable energy.
The GCG is not aligned with the appropriate level of transparency needed.

5) EU added value

83 The 2016 Commission's proposal for the Gas Security of Supply Regulation argued that the necessity of EU action was based on the following:

- “The increasing interconnection of the EU gas markets and the 'corridor approach' for enabling the reverse flows on gas interconnectors call for coordinated measures”;
- “Without such coordination, national security of supply measures are likely to adversely affect other Member States or the security of supply at EU level”;
- “The risk of a major disruption of gas supplies to the EU is not restricted to national boundaries and could affect several Member States, whether directly or indirectly”;
- “National approaches both result in sub-optimal measures and aggravate the impact of a crisis”.

Did the events of past years (in particular the 2022/2023 energy crisis and the increased importance of LNG as alternative to Russian gas) confirm these statements in your view?

- Yes
- No

- No opinion

84 Can you please elaborate on why you think that these events confirmed those statements?

750 character(s) maximum

More coordinated use of the existing pipeline interconnections and terminals helped a quick LNG ramp up providing room to reduce Russian gas flows, while a coordinated gas saving target played a crucial role in providing an extra security buffer. However, this coordinating spirit was missing in the continued overshooting build-out of LNG infrastructure following Russia's aggression of Ukraine, leading to overcapacity, lack of efficiency as well as high prices for consumers (eg. the example of German consumers' gas bills rising by up to 56% including due to high LNG investments.) Interconnectedness raises the impacts one country's decisions have on others, so also coordinated action on windfall taxes and conflicts of interest would be desirable.

85 Can you please elaborate on why you think that these events invalidated those statements?

750 character(s) maximum

B. Forward-looking

86 According to the impact assessment on the [2040 targets](#), natural gas demand in the EU should decline from ca. 319 Mtoe today to 100-150 Mtoe in 2040, with an increase in biomethane production. The overall decreasing gas consumption may lead to a change in consumption pattern with likely different speeds of phase out across sectors. How should the Gas Security of Supply Regulation change to remain relevant, considering the foreseen evolution of the EU gas supply and demand?

750 character(s) maximum

Inverse the logic of the SoS by recognizing the role of fossil gas as an energy insecurity vector, as it contributes to climate change, impacts human lives & exposes EU to external geopolitical events. Expand the now limited role that demand-side measures play to provide SoS, use coordination & info exchange for appropriate levels of decommissioning while (independently) assessing how SoS can be provided in a continued interconnected gas market. Open the Regulation to take into account the interplay between electricity & storage ramp up, gas demand reduction & SoS and open it to take into account the very limited role H2 may play in securing supply for some sectors formerly dependent on fossil gas. Include active role for ESABCC & CSOs.

87 Are there objectives for gas security of supply that were not considered in 2017 and that a potential revision of the Regulation should aim to achieve?



Yes

No

No opinion

88 Which blind spots in the current Regulation do you think should be addressed in a future update of the energy security framework?

750 character(s) maximum

The current SoS regulation lacks a gas savings measures or demand reduction approach (only a mention in Annex VIII of the Regulation). This can be approached as part of the emergency reduction measures implemented by MS during the 2022 crisis, but also by eg prioritizing CH4 abatement measures from imported gas=strengthening the supply chain by reducing leaks & aligning the SoS Regulation with the methane regulation & energy efficiency first principle.Regulation enables dangerous conflicts of interest by mandating ENTSO-G to make scenarios on gas supply & infrastructure disruption. ACER & the ESABCC should have a more independent oversight to avoid an oversized costly gas grid & enable decommissioning while ensuring SoS.

89 Some provisions expire in 2025, including the 90% storage target. What role do you think gas storage policies should play beyond 2025 in the short and long-term?

750 character(s) maximum

Gas storage targets need to be revised. With the structurally reducing gas demand in Europe, gas storage needs to be based on national phase out trajectories & demand forecasts. Instead of looking at the total storage levels a more flexible approach would allow electrification with renewables & increased electricity storage etc. to be phased in and gas to be phased out. This approach could require storage levels not exceeding 5 year average of demand (also taking into account interconnectedness where no storage exists in a member state) to be expanded to all member states. An integrated view combining both electricity /alternative storage & gas storage to avoid excess gas storing and a more holistic energy security view will be beneficial.

90 Should a revision of the Regulation provide more transparency on long-term gas contracts e.g. via Article 14, in particular where a single third country supplier represents a significant share of the overall supply mix?

Yes

No

No opinion

91 How should the Regulation provide more transparency?

750 character(s) maximum

More information on gas contracts, booked capacity, on foreseen import capacities, for stakeholders to be able to confront the gas industry's projections with the needed decline of gas imports. Also more transparency on the whole supply chain, where the gas is coming from, how methane emissions and leaks were reported and addressed, to avoid situations like with the Austrian OMV group which contracted new russian gas in 2022, after the crisis, creating now an issue for the Austrian government to implement a full Russian gas phase out.

92 Why should the Regulation not focus on providing more transparency?

750 character(s) maximum

93 How should the costs of maintaining a high level of gas security of supply be distributed between various actors, such as companies, citizens and governments?

750 character(s) maximum

C. Other

94 Do you have anything to add regarding the general functioning and/or the future evolution of the Gas Security of Supply Regulation?

- Overarching framework to phase out gas by 2035 with sector (industry, housing, power) level targets. Work on decommissioning and linking infrastructure planning to climate objectives, putting in place specific regulatory measures to allow for decommissioning (disconnection right protecting vulnerable consumers, spread decommissioning costs evenly), integrate heat and network planning, don't rely on unrealistic projections for future technologies (hydrogen), collect harmonized EU wide data for network developments, protect vulnerable customers.
- Putting gas saving measures first, by using the emergency gas demand reduction measures adopted by Member States during the crisis (Regulation (EU) 2022/1369) as a regulatory basis to gradually achieve a full gas phase out across sectors by 2035. Develop a response mechanism adapted to long-lasting supply shocks protecting vulnerable consumers first; transform the reliance on gas storage towards flexibility measures and shifting to renewable production. The gas storage targets need to be aligned with the structurally decreasing European gas market.
- Mainstream the EU's climate objectives: The risk assessment & scenario, combined with the preventive and emergency plans need to include an assessment of the climate change impacts on supply and infrastructure and need to further take into account the energy efficiency first principle. Strengthened involvement of the ESABCC will be key to ensure an independent oversight on the different assessments, plans or crisis declarations, to ensure the compatibility of proposed emergency responses with climate objectives.
- The solidarity measures to protect vulnerable consumers need to be adapted and strengthened, to be able to answer long-lasting energy supply disruption impacting energy prices, based on solidarity contribution measures (clause that safeguards Europeans from oil & gas majors raking in billions of windfall profits in emergency situations - as we saw it in 2022) towards less affected consumers, by integrating mechanisms fighting energy poverty. By contrast to the 'protected customers' which are the last ones to have gas supply reduced (eg households, energy poor) there could also be guidelines to identify 'least protected' customers which contribute least to our societies and added in an annex to a new regulation.
- Include a section about the future security of hydrogen supply: in the light of the high uncertainty around the use of this molecule for some sectors in our economies it is relevant for security of supply to prevent over-reliance on hydrogen.
- Add reference to methane regulation and put in place a methane import standard. Gas is mainly composed

of methane, and methane is one of the first and easiest low hanging fruits to tackle the climate crisis, a crisis affecting energy security. Methane abatement measures are a way to create gas revenues and can further strengthen the EU's reduction of gas imports, either through gas supply standards including a methane import standard or via gas saving measures. Curtailing flaring and methane leakages could save over 45 bcm of fossil gas in countries that currently export to the EU, those enabling an existing gas source without needing to construct any new import infrastructure. Methane abatement could also further help the EU to reduce its reliance on Russian gas. The revision of the infrastructure standards and gas supply standard integrating gas saving measures are also a good way to implement the "energy efficiency first principle".

- Include specific safeguards fighting the fossil gas lock-in effects due to uncoordinated gas infrastructure development relying on unsupervised and un-coordinated energy needs assessments.
- Enhance transparency and participation: Not only stakeholder consultations or optional invitation of stakeholders (which should include all relevant civil society organizations not only as the regulation says now 'organizations representing the interests of households').
- Revise the SoS's governance system (e.g the Gas Coordination Group, GCG) and include specific measures fighting conflict of interests created by the active involvement of the fossil gas industry. An independent body overseeing scenarios needs to be included, checking assumptions, risk assessments, preventive and emergency plans and the gas supply and infrastructure standards. A key blind spot in the Regulation is that it currently enables dangerous conflicts of interest by mandating notably ENTSO-G, the fossil gas transport industry with a direct interest in building and operating the gas grid, to make scenarios on gas supply and infrastructure disruption. ACER and the ESABCC should have a more independent oversight to avoid an inefficient, oversized and costly gas grid and enable decommissioning while ensuring SoS. The inclusion of civil society groups and a push for more transparency, accountability and crucial alignment with climate goals is also missing.

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