Public consultation - energy security fitness check

3. General questions on energy security

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

22 Please elaborate your choice:

From a broader perspective, achieving sustainable, affordable and secure energy supply is tightly linked to the need to strengthen the competitiveness of gas supplies to the EU, with a focus on new sources and infrastructure. One way to achieve a competitive supply is to put market parties in a position to conclude supply contracts, both long and short-term. The EU should support market participants by providing regulatory certainty and outlining a clear future for molecules in the EU energy mix, sending a consistent message to international partners that Europe will (have to) purchase natural gas and hydrogen in the decades to come. In addition, immediate action is needed to scale-up the production of renewable and low-carbon gases in Europe, as well as the investment into BECCS and CCUS technologies, to boost EU energy independence and progress towards our GHG emission reduction targets.

However, distorting interventions impacting wholesale prices must be avoided. Natural gas prices in the EU have stabilised below 2022/2023 crisis levels. Global natural gas demand returned to structural growth in 2024, driven by Asia, and LNG supply growth remains limited until new projects come online in the next 3-5 years. In this context, Eurogas welcomes the review of the EU SoS architecture, as it provides the opportunity to assess both the benefits and potential adverse effects caused by emergency measures, such as the Market Correction Mechanism and the Storage Regulation.

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

- Preparedness (assessment of risks and formalisation of emergency plans)
- Phase-out of Russian fossil fuel supply
- Strengthen the use of energy storage (electricity, gas, liquid fuels, heat) for energy security
- Making the most of existing infrastructure
- Securing energy-related supply chains
- Physical protection of critical energy infrastructures against man-made attacks
- Investments in domestic decarbonised energy system
- Allocating the costs of energy security fairly

- Energy demand response and reduction
- Diversification of energy sources, suppliers and routes
- Cybersecurity
- Resilience of energy infrastructure, e.g. to climate change
- Enhancement of interconnections and smartening of infrastructure between Member States

24 Please elaborate your choice

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 contributed to EU energy independence, especially through the integration of renewables, but challenges remain. The intermittency of renewable sources limits their contribution, requiring large-volume seasonal storage that relies on gaseous energy carriers, which necessitates maintaining much of the existing gas infrastructure. Smart hybrid heating should be promoted for managing seasonal imbalances in space heating, and a similar approach can be replicated in the industrial sector . Substantial investments in large-volume hydrogen storage and H2-ready power plants are needed to ensure long-term supply security. Moreover, supply diversification in end-use sectors is vital.

***26 Are there energy security risks associated with possible future electricity imports from third countries? Yes, no, NA**

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

Future electricity imports from third countries carry the same energy security risks that gas imports from third countries carry, mainly: supply disruptions due to geopolitical risks in our partner countries, emphasizing the need for diversified energy supply including molecules. Europe's reliance on imports for wind turbines, solar PV, and transmission infrastructure further limits electricity's role in ensuring supply security.

***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?**

To enhance EU energy security in a renewable-based system, targeted improvements are vital. A rapid shift to renewable and low-carbon gases, such as biomethane and hydrogen, supports decarbonization and adds flexibility. Biomethane development leverages agricultural and waste sectors, reduces emissions, and reduces geopolitical risks. Building a hydrogen value chain and implementing CCS are crucial for scaling clean energy. Diversifying domestic natural gas sources aligns with REPowerEU goals, reducing reliance on imports. Renewable and low-carbon gas-fired units can provide seasonal flexibility to support electrification, ensuring electricity supply security. Cost-sharing of security of supply across sectors should be monitored to prevent undue burdens on gas consumers.

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

Renewable and low-carbon hydrogen, including derivatives, can enhance EU energy security by ensuring a flexible, long-term storable energy supply, especially as natural gas use declines. Hydrogen can reduce electricity storage needs and thus support renewable integration while making use of existing, repurposed gas infrastructure. Allowing all renewable and low-carbon hydrogen types for rapid scale-up is vital for early infrastructure development. Liquid hydrogen-based fuels, valued for energy density and storability, offer a resilient alternative for intermittent renewables.

***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?**

Electrolytic hydrogen production relies on the availability of electricity at competitive cost. In addition, according to most if not all available projections, Europe's energy transition will rely on hydrogen imports. In principle, future risks associated to the global trade of hydrogen and its derivatives are mostly related to geopolitics and logistics. The EU energy security framework could support supply stability, but dedicated H_2 security of supply rules would be premature and risk slowing the sector's growth, as the recent hydrogen market monitoring report highlights.

***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.

The current EU energy security framework has not adequately addressed climate change related risks, such as nuclear curtailment during heatwaves, drought effects on hydro power or Dunkelflaute, or unavailability of wind and solar during periods of low temperature The reliance on electricity (imports) exacerbates such vulnerabilities, highlighting the need for demand response and a diverse energy mix and improved storage solutions which currently only gaseous energy carriers can offer.

***34 Liquified 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?

LNG, with its maritime transport and diverse supply sources, is crucial for diversifying energy supply and mitigating pipeline disruptions. However, Europe competes with Asia for LNG supplies, and demand swings can drive up prices, especially during supply crises. To reduce volatility, EU policies should not prevent MPs from entering long-term contracts. This can be achieved by providing a stable gas demand forecast until 2040/50, clarifying the notion of unabated fossil gas contracts beyond 2049 in the Gas Package, and addressing the impact of the EU Methane Regulation on LNG supply, with regards to obligations on importers and the corresponding penalties. Strengthening gas transport infrastructure, particularly for landlocked EU countries, would improve LNG access.

***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**

Obviously, all import dependent economies face the same questions when dealing with supply security. And each finds slightly different responses to that same question. For example, Japan is currently developing the idea of an LNG buffer mechanism which also includes a role for export credit agencies to secure investment and hence influence in the operation and design of LNG upstream facilities.

We believe it should be explored how the EU and its partner countries could develop an institutionalized exchange of risk-assessment and risk-preparedness mechanisms and thus ensure a higher level of awareness of both the actual risk level and Europe's options to mitigate it.

37 Which measures would you like to see mirrored?

Consistent with REPowerEU and the strategies of other leading countries globally, the EU should boost local renewable and low-carbon gas production to enhance energy independence and reduce reliance on imports. This will also improve the environmental footprint through methane standards and shorter transport routes, reduce exposure to geopolitical risks, and stabilize gas prices. Additionally, promoting BECCS solutions can help achieve negative emissions, while keeping options open for domestic natural gas sources. Similar to the established energy transition policy in Japan, we suggest to exploring the potential of e-methane imports.

***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:

See above our response to Q36.

Maintaining an affordable energy supply is best achieved through a competitive gas market, where experienced market actors can negotiate effective contracts. While the AggregateEU instrument, as outlined in the Gas Package, should remain a voluntary, market-driven platform for matching buyers and sellers, the EU could strengthen its global position by pursuing partnerships with gas-exporting nations and facilitating collaboration on compliance with EU law such as the Methane Regulation, while allowing market players to handle contractual arrangements.

***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?**

We believe it is very hard to quantify the costs and benefits of each of the numerous legislative initiatives the EU has taken to manage Europe's supply security. It would be even harder to compare this with relevant measures taken at MS level. However, as a principle, the SoS Regulation should enhance cooperation at the EU level, particularly through mechanisms like the Gas Coordination Group (GCG), without imposing prescriptive measures on market participants. The SoS Regulation promotes this approach, yet implementation gaps persist, particularly in establishing solidarity agreements between Member States, which are essential for a resilient and integrated energy security framework.

***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**

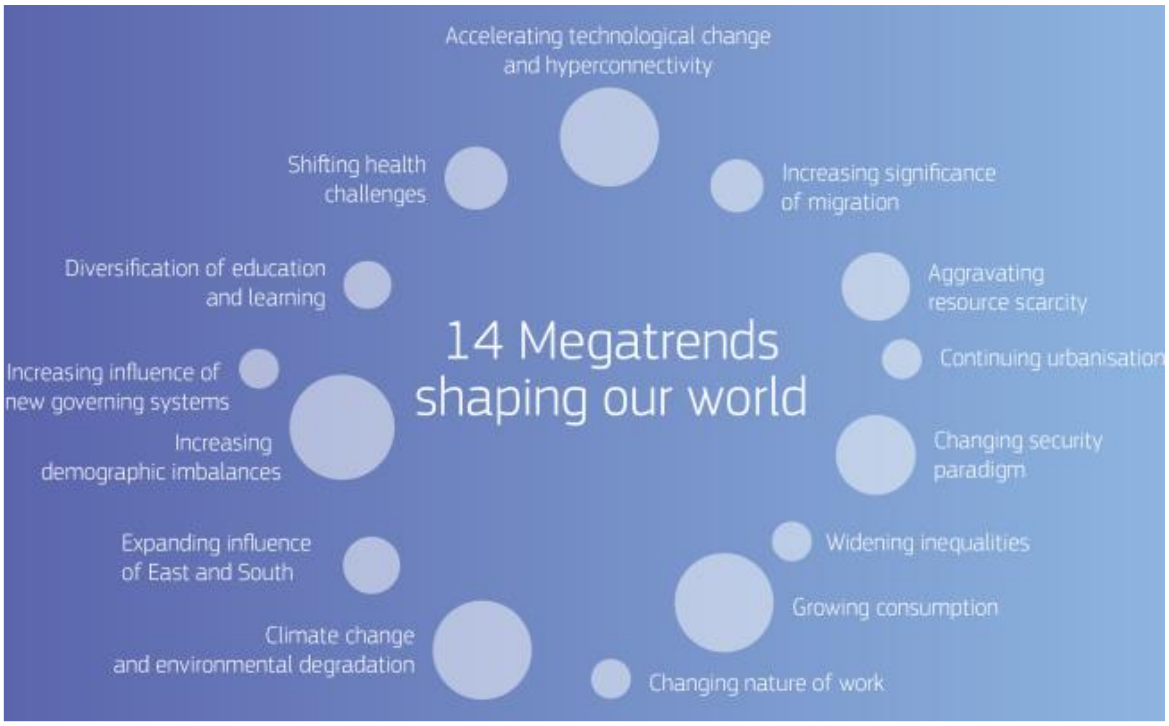
42 Please elaborate:

EU level coordination remains equally important. The crisis highlighted that without it, national actions — such as individual Member States' Neutrality Charges to recover storage costs — can lead to inefficiencies, risking market integration and security. A coordinated EU approach that balances national needs with collective strategy is essential to avoid unilateral actions that could weaken the resilience of the EU's gas supply system.

***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?**

Energy security policy should ensure supply by maintaining infrastructure and flexibility, though it comes at a cost which should be fairly allocated. With strategic planning, affordable energy can be secured, particularly by supporting a competitive and integrated EU gas market. Price signals allowing efficient energy use should prevail. Embracing technologies like CCUS, renewable and low-carbon hydrogen, and biomethane will be essential to meet our energy transition targets in an economically viable and sustainable way. A more balanced transition, that includes renewable and low-carbon gases, allows for their free exchange across borders and uses existing infrastructure, becomes a more cost-efficient decarbonization solution and keeps energy prices manageable.

***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 EU Energy Security architecture is least prepared for the megatrend of growing consumption. Gases play a critical role in maintaining a reliable energy system, particularly with increasing intermittent power supplies, energy storage needs, and long-distance transport requirements. As demand, supply, and infrastructure assumptions change, the reliance on gases like hydrogen intensifies. Gas and hydrogen-fired plants are vital for backup capacity in a renewable-heavy system; without investment, energy security risks increase. Additionally, electrolysers and methane-based imports are essential for balancing renewables, supporting resilience, and achieving climate goals.

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

The success of Europe's energy transition hinges on balancing affordability, security, and sustainability. Gases—natural, renewable, and low-carbon—are critical to ensuring this balance and enhancing resilience. Acting now to secure these gases supports a stable energy system, as they are cost-effective enablers and a safeguard against unmet energy demands Prioritizing the integration of renewable and low-carbon gases while maintaining gas infrastructure is vital for a secure, adaptive energy future.

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

Frontier study to be uploaded.

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?

	Very poor	Poor	Average	Good	Excellent
Secure an adequate level of preparedness in Europe for gas supply disruptions e.g. through assessing risks and sufficient infrastructure				X	
Ensure that all necessary measures are taken to safeguard an uninterrupted supply of gas in particular to protected customers				X	
Enhance regional and EU wide cooperation including in times of supply imbalances			X		

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

The SoS framework should not result in unnecessary cost and administrative burden. While a coordinated EU approach to risk preparedness is beneficial, implementation gaps persists, particularly in preventive and emergency action plans, with many solidarity agreements still absent and plans missing regional chapters. From an MPs perspective, the strict gas storage filling trajectories are challenging; they disrupt commercial operations of private entities and impose high costs. The complexity of SSO certification further complicates matters, while cross-border transmission tariffs limit beneficial options for SoS such as UA storage. A cost-benefit analysis of storage obligations could improve the framework.

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

Eurogas acknowledges the value of storage obligations during crises but warns that proposed obligations, particularly intermediary filling levels, limit market flexibility and risk devaluing storage facilities. These restrictions could have lasting negative effects on the EU energy market, which has operated effectively. Balancing interventions is crucial to preserve market dynamics and ensure storage facilities' value in managing supply and demand fluctuations. Impacts vary by region, especially in CEE/SEE reliant on seasonal storage. Demand reduction measures must remain temporary during crises to avoid industrial delocalization. The Market Correction Mechanism has had minimal effect, risks market disruption, and should not be extended.

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

	Not effective at all	Marginally effective	Moderately effective	Effective	Very effective
Gas coordination group					x
Infrastructure standard and bidirectional capacities				x	
Supply standard and protected customers			X		
Common Risk Assessments			x		
National Risk Assessments			x		
Preventive Action Plans and Emergency Plans				x	
Crisis management				x	
Crisis levels				x	
Solidarity provisions			x		
Information exchange requirements under Article 14		x			
Storage targets			x		
Annual storage trajectories set by the Commission		x			
Storage system operators' certification	x				
Demand reduction and EU-alert		x			
Cooperation with Energy Community Contracting Parties	x				

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

We recommend that the Security of Gas SoS Regulation foster enhanced cooperation among MS without imposing detailed solutions. Interventions should be limited to extreme situations to respect subsidiarity and avoid unnecessary costs. A coordinated approach to risk preparedness at regional and the EU level and across the electricity and gas sectors, utilizing the GCG, should be prioritized, addressing implementation gaps in preventive plans and solidarity agreements among MS. Cooperation with Energy Community Contracting parties could be improved through integration in the GCG or elaboration of solidarity agreements.

Furthermore, the Aggregate EU framework should maintain its voluntary nature and reject a "single EU buyer" mechanism to uphold competition and efficiency. Demand reduction measures should only be temporary and crisis-specific to prevent industry delocalization.

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

Storage filling has ensured supply security and generally helps avoid severe price spikes, but inflexible requirements have led to high costs. If extended, storage requirements need an impact assessment and amendments to avoid market distortions and clarify provisions of the Storage Regulation. The 1 November filling target could adapt to gas demand reductions and regional specifics, balancing market certainty with flexibility for participants to exceed targets when supply permits. Intermediate filling trajectories could be reduced or removed, and storage certification simplified. Eurogas prioritizes market-based mechanisms for storage, reserving last-resort measures for cases where market solutions fall short of expected benefits.

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

The Storage Regulation has brought costs and benefits. Bruegel reports that EU gas storage hit 90% in November 2022 at a cost of €100bn, ten times the usual expense, while helping secure supply. In Germany, the gas storage neutrality charge was set at 2.5€/MWh by July 2024, roughly 7% of the TTF spot price. While Eurogas sees the price dampening effect of storage, quantifying market-driven vs. regulation-induced impact is difficult. The neutrality charge has distorting effects, increasing interconnection tariffs, reducing trade efficiency, and hindering market integration. These challenge the EU's efforts to reduce dependency on Russian gas, counteracting REPowerEU goals, and should be minimized.

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

	Negligible	Low	Average	High	Very high
Gas coordination group	x				
Infrastructure standard and bidirectional capacities		x			
Supply standard and protected customers		x			
Common Risk Assessments	x				
National Risk Assessments	x				
Preventive Action Plans and Emergency Plans	x				
Crisis management		x			
Crisis levels	x				
Solidarity provisions	x				
Information exchange			x		

requirements under Article 14					
Storage targets				X	
Annual storage trajectories set by the Commission					X
Storage system operators' certification				x	
Demand reduction and EU-alert			x		
Cooperation with Energy Community Contracting Parties			x		

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

In relation to the review of the SoS framework, we recommend conducting a cost-benefit analysis of the various emergency measures implemented during the crisis, as detailed in this list. This analysis should particularly focus on evaluating the market impact of the storage obligation.

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

The reporting requirements under Article 14 lack clarity, leading to uncertainty about how the information is utilized. To simplify, it may be beneficial to eliminate redundant requirements and streamline the reporting process.

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 Gas SoS Regulation has been significant in addressing gas supply challenges in the EU, particularly during the 2022/2023 energy crisis. The GCG facilitated crucial information sharing among Member States regarding winter preparedness and LNG infrastructure. This collaborative framework enhanced the EU's resilience to supply disruptions, particularly in light of reduced gas flows from Russia. However, implementation challenges remain, such as infrastructure bottlenecks in some regions, which hinder a fully cohesive response and effectiveness of the solidarity provisions. Overall, while the Regulation provided a framework for cooperation, ongoing efforts are needed to overcome these implementation gaps.

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

The Gas Security of Supply Regulation must adapt to technological advancements and environmental challenges. As the EU moves toward greener energy, strategic gas reserves should transition to hydrogen storage and distribution, ensuring long-term energy security. Domestic production, including biomethane, should be prioritized to diversify energy sources and enhance resilience. Regulations must emphasize flexibility in energy systems to accommodate fluctuating supply and demand, enabling the EU to effectively navigate both energy security and climate goals. Recent crises highlight the need for reliable supply chains and innovation in energy infrastructure to support this transition. This should be reflected in the risk assessment and plans foreseen in the Regulation.

4) Coherence

80 To what extent is the Gas Security of Supply Regulation aligned with other EU policy goals? 750 character(s) maximum

Overall, it is challenging to reconcile sustainability, security of supply, affordability and competitiveness of energy supply. Gases have a key role to play when it comes to bringing together these objectives. In this context, we recommend to ensure that SoS Regulation maintains a balanced approach to avoid unintended consequences with potentially long-lasting negative effects on an otherwise well-functioning market. This requires assessing the impact of measures such as storage obligations or the Market Correction Mechanism on the functioning of the energy market, or of gas demand reduction measures on competitiveness. Finally, the impact of the Methane Emission Regulation on security of supply needs thorough assessment, as stricter emissions controls could affect gas availability and pricing.

81Did 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

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

The crisis highlighted that, without coordination, national-level measures can lead to suboptimal results, as seen with the Neutrality Charges imposed by some MS to recover costs of storage filling requirements. Such measures, taken without sufficient EU-led cooperation, demonstrated the risks that arise when MS act independently, potentially compromising the integration of the EU's internal gas market.

An EU-coordinated approach, which balances national peculiarities with a strong framework for collective action, is vital to prevent unilateral initiatives from undermining the overall security and resilience of the EU's gas supply system.

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

The EU must secure sufficient LNG amid global competition, with realistic demand forecasts and political support for contracts to mitigate market risks. The Gas Package's ban on long-term contracts for unabated fossil gas post-2049 must be clarified, to enable market-participants to conclude agreements. By 2050, gases, particularly hydrogen and biomethane, and technologies like CCUS will remain crucial in meeting final energy demand. Renewable and low-carbon gases should be phased in rapidly, supporting energy security and stability as a cost-efficient transition path. Investment in gas infrastructure, including strategic reserves and hydrogen storage, will ensure preparedness if renewable targets are not fully met.

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

To enhance the energy security framework, future updates should address several critical blind spots. Firstly, the question of under what circumstances Member States would curtail exports in an emergency remains unanswered, creating uncertainty in crisis management. Secondly, there is a need for improved mechanisms for sharing the costs of security of supply measures that benefit neighboring Member States, ensuring a fair distribution of responsibilities and resources. Finally, we advocate for the incorporation of the biomethane production target from the REPowerEU plan (35 bcm/year by 2030) into the EU Security of Supply framework as a binding target. This measure would facilitate the EU's transition away from Russian energy dependency while simultaneously aiding in the decarbonization of the EU's energy system.

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

EU natural gas prices have stabilized below 2022/2023 crisis levels, but global demand has resumed structural growth. The market remains tight until new LNG capacities come online in 3–5 years and the transit situation via Ukraine is solved. If extending the storage target is considered, an impact assessment of the Storage Regulation (e.g., ENSTOG's 2026 risk assessment) is necessary. Any extension should require amendments based on the findings, such as lower November filling targets, fewer milestones at MS level depending on alternative supplies (LNG, flexible domestic gas or biomethane production), and consideration of domestic energy mix and regional specificities. Clarifications are needed on filling obligations as a % of MS gas consumption, alternatives, regional factors, and simplifying storage certification.

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

Eurogas holds the view that the current Regulation provides the necessary transparency in long-term contracts.

92 Why should the Regulation not focus on providing more transparency? 750 character(s) maximum

While Eurogas understands the intent of providing additional certainty, the current frameworks, notably on LNG data reporting and LNG benchmark reporting under the recently revised REMIT framework, alongside additional transparency mechanisms planned under the Methane Emission Regulation (Art. 30), are sufficient to ensure the transparency of the gas market.

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

Ultimately, the cost will be borne by the consumers. Even if allocated elsewhere in the value chain, costs of SoS will be reflected in the end price. Costs should be shared with minimal market distortion, such as through end-customer charges or taxation. Enhanced burden-sharing mechanisms for security of supply that benefits neighboring countries could improve fairness. The solidarity mechanism allows for fair cost compensation; linking it to wholesale market prices helps prevent free-riding and could strengthen cooperation between Member States. Addressing implementation gaps and refining compensation frameworks are essential for effective burden-sharing and regulatory certainty.

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

The EU energy platform and Aggregate EU tool should maintain their voluntary nature and reject a "single EU buyer" mechanism, as it conflicts with EU competition policies that promote transparency, efficiency, and the proper functioning of the internal energy market. Joint purchasing would not effectively address the EU's supply issues, as competition is primarily with global actors, such as those in Asia, rather than among Member States. The unique characteristics of the biomethane market—marked by decentralized production, varying product traits, and diverse feedstocks—render the Aggregate EU model unsuitable for this sector. Instead, Eurogas advocates for a stable legal framework that encourages domestic biomethane production, enhancing security of supply and sustainability while preserving a competitive gas market.