

EU Energy Security Framework (Revision)

Call for Evidence

Eurogas Response

Competitiveness, sustainability, and security of supply are fundamental pillars of Europe's energy future. The review of the Union's Security of Supply (SoS) framework comes at a pivotal moment, as the European Union advances its plans to phase out Russian gas. This review must enable a **diversified and resilient energy system, prioritise market-based measures** to avoid costly interventions, and strengthen the framework's **operational readiness** through targeted clarification and simplification. Eurogas therefore welcomes the Commission's initiative and supports targeted revisions that:

- **Recognise the complementarity of the electricity and gas systems**, where gases provide essential flexibility;
- **Incorporate range-based demand scenarios** to reflect a wider set of trajectories and policy options;
- **Promote market-based diversification of supply**, including the development of renewable and low-carbon gases;
- **Facilitate data analysis and transparency** while avoiding new reporting layers;
- **Clarify and streamline SoS requirements**, particularly in crisis management and solidarity mechanisms.

Building on Eurogas' response to the European Commission's energy security fitness check consultation¹, and Eurogas' recommendations for a competitive European Energy Security of Supply framework², Eurogas offers targeted input on the key areas for action identified by the Commission in this review process.

1. Diversification

Avoid Measures that Unintentionally Create Barriers to Diversification

Eurogas urges the European Commission to review any existing and upcoming measures to avoid unintended consequences with regards to potential barriers for European importers in pursuing diversification and security of supply. In particular, the importers' requirements introduced by the Methane Emissions Regulation, the Corporate Sustainability Due Diligence Directive (CSDDD) and the upcoming obligations foreseen in the Regulation on the phase-out of Russian gas risk causing significant challenges for European

¹ Eurogas, [Response to the European Commission's energy security fitness check consultation](#) (Dec. 2025).

² Eurogas, [Recommendations for a Competitive European Security of Supply Framework](#) (Mar. 2025).

buyers as they are not practical and workable. We believe that the ongoing review of the Energy Security Framework should focus on creating a stable, investment-friendly regulatory environment, for example by ensuring that the abovementioned regulations are practical and workable for EU importers and third-country partners. **The Commission's role is important to ensure reliable commercial partnerships with third countries, while allowing the market to keep making contracting decisions and avoiding market interventions that could unintentionally disrupt trade.**

Demand Projections and Range-Based Scenarios

To diversify the EU's energy supply, investors and suppliers need clearer guidance on future gas demand. Updating the 2030, 2040 and 2050 natural gas consumption projections with range-based scenarios would provide the flexibility needed for infrastructure planning and supply contracts.

We welcome the Commission's intention to include such sensitivity scenarios into the SoS framework to ensure that Europe's infrastructure and market signals remain aligned with its energy security goals.

Support domestic production of less carbon intensive energy

To decrease its dependence on imports, the EU should immediately scale up the domestic production of renewable and low-carbon gases and invest in (BE)CCUS technologies that can help reduce emissions and even reach negative emissions, including in the building sector and energy-intensive sectors such as industry and transport. A technology-neutral and pragmatic policy framework with simplified regulatory requirements would ensure that gases complement electrification and support an affordable, resilient, and sustainable energy system.

Eurogas stands ready to provide input to the Commission with regards to gas supply diversification and scaling renewable/low-carbon gases and would support the creation of a Gas sectoral dialogue, notably with the Gas Market Task Force referred to in the Affordable Energy Action Plan.

2. Monitoring and transparency

Streamline transparency and origin tracing requirements

In areas identified for future improvements, the Commission notes gaps in data on energy security, including the traceability of gas imports. As Eurogas has highlighted in the context of the EU Methane Regulation and the Russian gas phase-out proposal³, precisely identifying the origin of gas can be challenging for EU importers in certain supply chain setups. This potential challenge on traceability is adding to the challenges our industry is facing in managing duplicating and overlapping reporting requirements at the European and national levels and other complexities related to regulatory requirements, dynamic markets, and logistical constraints, with overall potential impacts on trading and security of supply.

Eurogas proposes, in the spirit of EU regulation, that reporting obligations under the Russian gas phase-out remain proportionate, relying on information already available to market participants through existing

³ Eurogas, [Ending Russian Gas Imports: Ensuring a Practical and Legally Sound Approach](#) (Aug. 2025).

regulations such as the Union Customs Code or REMIT, avoiding unnecessary administrative burdens. The same principles of proportionality, simplification, and pragmatism should apply under the EU Methane Regulation.

Finally, Eurogas supports enhanced cooperation and data sharing between the European Commission, ENTSO-G, ACER, and Member States, building on existing platforms such as REMIT reporting and the Gas Coordination Group, to make the best use of available information rather than creating additional reporting layers.

Limit Access to Sensitive Contractual Information Under Russian Gas Phase-Out Proposal

Connecting the Gas Security of Supply Regulation with the Russian gas phase-out proposal of the Commission, currently under negotiations in Council and European Parliament, Eurogas expresses strong reservations about the broad information request powers granted to the European Commission under Art.13(2) v, vi, and vii. The possibility for the Commission to require access to detailed contractual clauses – beyond what is necessary for customs or compliance checks and already provided by the UCC and REMIT – raises serious concerns about commercial confidentiality and legal risk. Such disclosure obligations would create uncertainty for importers and could undermine trust in the regulatory framework. Eurogas advocates for strictly limiting access to sensitive contractual information, recommending that SoS Regulation requests be confined to data already reported to ACER under REMIT to ensure proportionality and protect commercial confidentiality.

3. Recognise the Complementarity of Gas and Electricity in Infrastructure Standards, Risk Assessments and Plans

Focus on the Link Between Gas and Electricity Infrastructure

As the energy transition progresses, the increasing interdependence between sectors calls for a more integrated and regional approach. A good example to capture the link between the two sectors is given by the fundamental role gas plays in ensuring electricity flexibility and security of supply⁴. The future SoS framework should prioritise cross-sectoral regional assessments, ensuring that electricity and gases are considered together in security planning. In this context, **Eurogas believes demand scenarios used within the context of the EU SoS framework should also consider sector coupling between gas and electricity, and flexibility provided by all energy vectors.**

In addition, **Eurogas welcomes ENTSO-G's proposal to introduce a medium-term analysis that would complement the European Resource Adequacy Assessment of ENTSO-E⁵**. Building on ACER's conclusions about infrastructure planning and adequacy assessments⁶ – which highlight the shortcomings of building

⁴ European Commission, [The EU's energy security framework successfully tested to ensure winter preparedness](#) (Nov. 2024)

⁵ ENTSG's proposal was presented during the Gas Coordination Group held on 8 July 2025.

⁶ ACER, [Study to support the development of scenarios for EU-wide infrastructure planning and adequacy assessments](#) (Aug. 2025).

scenarios based on National Energy and Climate Plans – we recommend that this assessment includes a broader range of scenarios. Doing so would strengthen the EU’s infrastructure preparedness and resilience. This approach could also be extended to consider other energy vectors, such as hydrogen.

Finally, the scope of the Gas Coordination Group should be merged with the electricity fora into a **comprehensive security-of-supply body**, addressing not only gas but the entire EU energy system. This expansion would strengthen overall energy resilience across the Union.

Adapt and Repurpose Gas Infrastructure

Diversification and efficient use of gas infrastructure is essential to provide increased flexibility to the EU energy market. Since mid-2022 and over 2024, LNG regasification capacity in the EU has expanded by 70 bcm/year, enabling the import of flexible volumes of LNG and satisfaction of demand⁷. Gas storages offer more than 100 bcm of storage capacity, which represents about one third of the EU’s annual gas consumption. This infrastructure can be reused or repurposed to accommodate renewable and low-carbon gases such as biomethane, hydrogen and derivatives or captured CO₂. Better integration of gas and electricity sectors would also allow the system to rely on existing gas infrastructure. Address Security of Supply Infrastructure Costs and Combine Market-Based Infrastructure Use with Supply Standards.

Security of Supply Infrastructure Costs

Infrastructure plays a central role in ensuring security of supply, as evidenced by the addition of over 70 bcm of LNG regasification capacity in Europe since mid-2022. However, transmission tariffs are now increasing at a faster pace and with less predictability, while network codes are still not fully implemented in several Member States. For example, during the recent crisis, unplanned tariff changes were applied on top of the tariffs for the prevailing period, and many of these adjustments remain in place today. Looking ahead, further changes will be driven by the need to provide additional flexibility to support the electricity sector, the shifting of gas flows resulting from the Russian gas phase-out, and the ongoing replacement and refurbishment of networks to accommodate hydrogen and biomethane. In this context, **it is crucial to enhance transparency and predictability of tariffs, ensuring that investments are efficiently planned and implemented, and that system users can reliably anticipate costs, maintain market competitiveness, and continue to support affordable and secure gas supplies across Europe.**

Focus on Market-Based Measures to Fill Storages

Eurogas recognises the critical role of gas storage in ensuring security of supply, particularly during times of crisis. However, the European energy landscape has significantly evolved since 2022, when the EU Gas Storage Regulation was first implemented, warranting a reassessment of emergency measures. While the Regulation was important in managing gas supply during the initial shock, storage obligations carry the risk of further exacerbating the problem of high and volatile wholesale gas prices. The revision of the Regulation (Sept. 2025) moved in the right direction, by introducing important flexibilities – e.g., increased window of time to reach the filling target, newly established indicative nature of trajectories, flexibility mechanisms

⁷ European Commission, [Liquefied Natural Gas](#) (2025).

allowing the reduction of the target based on countries' specific conditions. **Building on the experience of the energy crisis and in line with the Commission's commitment to affordable energy, Eurogas would recommend the Storage Regulation be subject to a thorough impact assessment before a prolongation is considered, to evaluate its economic, security and market implications.** This impact assessment should take into account the changing market environment, including LNG supply developments and flexible gas production; the costs and benefits of maintaining high storage obligations beyond crisis periods; the potential market distortions caused by rigid storage targets and intervention measures.

Gas Supply Standard

Future proof gas supply standards should go hand-in-hand with a combination of market-based instruments (storage, regasification, contract flexibility, demand side response, etc) to provide the necessary level of security of supply.

a. Clarify the Definition of Protected Customers at the European Level

Protected customers are central in the discussion of EU energy security, as this element influences many aspects of the energy security framework, from potential gas demand to obligations for gas shippers and suppliers, as established in Art.5-6 of the Gas SoS Regulation. **While supporting the current system that leaves the room for adaptation to national authorities, Eurogas believes that clarification at European level would be beneficial in this context, for example to avoid solutions that go against competition and market rules. This definition should be considered under a more cross-sectoral approach, including considerations on the essential electricity demand (part of which is, for instance, satisfied by gas fired power plants).**

b. Consider an Update of the Weather Conditions Which Impact the Energy Demand and Supply

The current supply standard rules cover situations of extreme cold spell. It is recommended to update the weather conditions relevant for the supply standards taking into account the integration of intermittent energy sources in the system – e.g., Dunkelflaute incidents are currently observed impacting the functioning of the market.

4. Clarify and Implement Existing Measures on Crisis Management & Solidarity

Before considering further modifications or implementation of new regulations, Eurogas stresses the importance of implementing the mechanisms already in place. Clarity and transparency are fundamental for all stakeholders involved, and for the proper functioning of the EU security of supply framework. Some examples of further implementation and/or clarification needed can be found in:

- Declaration of a crisis (Art.11 of the Gas SoS Regulation), where a clarification of the steps involved in reaching this declaration is necessary. Currently, the mechanisms to reach a crisis level are unclear and could trigger the adoption of non-market-based measures and/or emergency measures like a gas demand reduction. Eurogas encourages the Commission to clarify these points, by describing different phases and situations which would bring a change in the measures to be taken – from i. market-based measures, to ii. some non-market-based measures to be applied, and finally to iii. last resort measures

such as solidarity mechanisms, in case the market is unable to supply (“solidarity”) protected customers. The tipping point to non-market-based measures should be clearly stated in the legislation. Activation of these measures should only be allowed after all market-based measures are exhausted and should be harmonised so that it does not lead to distortions within the internal market.

- Preventive action plans (Art.8-9 of the Gas SoS Regulation), emergency plans (Art.8, 10 of the Gas SoS Regulation) and regional risk assessments (Art.7 of the Gas SoS Regulation). In this context, Eurogas stresses the importance of providing clarity to gas shippers and distributors, including on roles and responsibilities of all stakeholders involved, and the costs associated with said plans. All Member States should work on consistent regional plans.
- Solidarity mechanisms (Art.13 of the Gas SoS Regulation), that are currently not fully implemented, as agreements among Member States are not yet fully established. Clarifications should also be given that Solidarity mechanisms should be a last resort measure, to be applied only if market-based measures have been exhausted – in line with EU Gas Security Regulation and the new Gas Package, and if volumes from licensed suppliers have proven insufficient to address an extreme weather scenario.
- Solidarity agreements should be set throughout the EU. Making use of the many instruments already included in the Gas SoS Regulation would ensure security of supply for EU citizens, limiting significantly negative effects caused by market interventions.

In this context, the Gas Coordination Group represents an exceptional avenue to increase discussion among the parties involved – Member States and private stakeholders, and its role should be used at the greatest extent possible.