Navigating the TEN-E Regulation Revision

Assessment of the 2026 Trilogue Positions

October 2026

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Context

Following a detailed review of the respective positions of the European Commission, the European Parliament and the Council regarding the revision of the TEN-E Regulation (EU) 2022/869, Eurogas would like to share the outcome of its members' assessment of several key provisions. This assessment echoes and complements recommendations presented in the Eurogas position paper "European Grids Package: A Technology-Neutral & Integrated Energy System" (April 2026).

Overall, Eurogas believes that an effective revision of the TEN-E Regulation should support balanced and responsive infrastructure planning, facilitate the development of hydrogen and CO_2 infrastructure, and streamline procedures for strategic projects. Particular attention should also be given to creating a framework for hydrogen infrastructure that enables investment, including in repurposed gas assets, while reflecting the current uncertainties surrounding market uptake, demand and infrastructure deployment.

Eurogas assessment

Article 1

Eurogas welcomes the European Parliament's proposal to adopt a more holistic approach to energy infrastructure planning, explicitly recognising energy affordability, system resilience and climate change adaptation. This better reflects the objectives of the energy trilemma and ensures that infrastructure development contributes not only to decarbonisation, but also to secure energy supplies and affordable energy costs for consumers.

Eurogas considers that the holistic approach to energy infrastructure planning, and particularly the Union Strategic Scenario under Article 11, should help recognizing the value of existing gas infrastructure and its potential to contribute to a cost-effective energy transition. Gas distribution system can increasingly accommodate biomethane and other renewable and low-carbon gases, reduce emissions while making efficient use of existing infrastructure. Energy scenarios should assess electricity, gas infrastructure, hydrogen and CO_2 networks on a consistent and technology-neutral basis, taking account of their respective contributions to decarbonisation, affordability, resilience and security of supply.

Article 2(9)

Eurogas supports the European Parliament's proposed definition of a "smart electricity grid". The reference to the active participation of all users connected to the network better reflects the required growing contribution of consumers, prosumers, storage facilities, flexibility resources and aggregators to the cost optimization of modern energy systems.

Article 2(17)

Eurogas welcomes the European Parliament's proposal to include CO_2 infrastructure within the definition of repurposing. However, Eurogas considers that the exclusion of hydrogen blending does not adequately reflect the practical pathway for hydrogen network development.

Article 2(19c)

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Eurogas supports the European Parliament's proposed definition of "innovative non-wire solutions", notably the inclusion of flexibility-enabling technologies that actively manage network constraints using real-time data and control. This technology-neutral approach unlocks a broader range of flexibility solutions, including hybrid heating systems and cogeneration, while supporting more efficient grid operation.

Article 4(3)(b)(iv)

Eurogas supports the European Parliament's proposal to explicitly recognise demand response, energy storage and grid-supportive cogeneration as components of smart sector integration. These solutions enhance system flexibility, optimise infrastructure use and support the deployment of hybrid heating solutions, including cogeneration.

Article 7(6a)

Eurogas welcomes the European Parliament's proposal initiated by MEP Andrea Wechsler to support the recognition of biomethane facilities and their grid connections as projects of overriding public interest. This recognition is important to allow faster permitting procedures and facilitate the deployment of biomethane infrastructure, contributing to decarbonisation, energy security and the integration of renewable gases into the energy system under the principle of technology neutrality.

To ensure the provision appropriately reflects operational realities, Eurogas would like to suggest a clarification recognising that biomethane injection may not always be possible at the geographically closest connection point due to technical and economic constraints. We therefore would welcome a complementary wording such as "[...] injection of biomethane into the nearest technically feasible and economically efficient existing grid connection point". **Article 11**

Eurogas supports the European Parliament's approach to Article 11. Eurogas supports a coordinated Union Strategic Scenario provided that it remains technology-neutral, transparent and genuinely multi-vector, and fully recognises the system value and decarbonisation potential of Europe's existing gas infrastructure, including through the scaling-up and integration of biomethane. To avoid ambiguity regarding the scope of the Union strategic scenario, **Eurogas recommends explicitly referring in the title of Article 11 to both the Union List and the Ten-Year Network Development Plans (TYNDPs).**

A title such as "Union Strategic Scenario for the Union List and for the Ten-Year Network Development Plans" would better reflect the intended purpose of Article 11 and prevent the perception that the Union strategic scenario is solely designed to support project selection for the Union List.

Article 11(1)

Eurogas welcomes the European Parliament's inclusion of CO_2 transport and storage in the Union strategic scenario, including for the establishment of the Union List, the TYNDPs, infrastructure needs identification, energy system-wide cost-benefit analysis, and cross-border cost allocation. Recognising CO_2 infrastructure across these planning processes adequately reflects the role of CCS in industrial decarbonisation and supports the timely development of the CO_2 transport and storage networks needed to achieve the EU's climate objectives.

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Eurogas supports updating the Union Strategic Scenario every two years, as proposed by the European Parliament. For the initial scenario, however, Eurogas supports a timeline of two years following the entry into force of the Regulation, in line with the proposals of the European Commission and the Council.

The development of the first Union Strategic Scenario will require the establishment of a new methodology, governance framework and stakeholder consultation process, as well as the integration of multiple sectors and planning instruments. Allowing two years for the first exercise would help ensure a robust and comprehensive outcome, while maintaining a two-year update cycle thereafter would preserve the responsiveness of infrastructure planning to evolving energy system developments. This represents a balanced compromise between the European Commission, European Parliament and Council proposals.

Article 11(1a)

Eurogas supports the European Parliament's proposal and welcomes, in particular, the elements set out under points (ii) and (iii) of Article 11(1a). These provisions strengthen the robustness and comprehensiveness of scenario development through the introduction of alternative scenarios reflecting actual progress in implementing Member States' NECPs and mandatory sensitivity analyses testing the resilience of infrastructure planning under different assumptions. However, no version of Article 11 mentions security of supply or affordability.

Article 11(2)

Eurogas welcomes the European Parliament's amendments, notably points (bb), (bc) and (c), which strengthen the Union Strategic Scenario by better reflecting distribution network needs, national and regional specificities, and the impact of different system conditions on infrastructure planning.

- **Point (bb) provides an appropriate framework to consider biomethane development** plans and gas distribution network planning through the inclusion of distribution-level constraints and DSO data. In addition, the sensitivity analyses foreseen under point (c), including multi-day and seasonal variations in renewable generation and demand, are essential to properly capture the system value of gaseous energy carriers and related infrastructure.
- **Eurogas also supports the cross-sectoral approach set out in point (b)**, including the consideration of CO_2 transport and storage infrastructure. Ensuring consistency across the electricity, hydrogen, gas and CO_2 value chains is essential to support efficient infrastructure development and evolving decarbonisation pathways.

Article 11(4)

Eurogas supports the European Parliament's proposal to formally involve the EU DSO Entity in the development of the Union Strategic Scenario. As the EU DSO Entity now represents electricity, gas and hydrogen distribution system operators, it is well placed to provide the Commission and ACER, upon request, with the data and information necessary to ensure robust, comprehensive and representative scenario modelling across all relevant energy vectors.

Article 11(5)

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Eurogas expresses a preference for the Council's approach providing two months, instead of one, to the TEN-E Group to comment on the Commission scenario. However, Eurogas members consider that ENTSOG's contributions should also be included in the TEN-E Group's work, alongside ENNOH and ENTSO-E, under the justification that the scenarios cover gas infrastructure as well as electricity and hydrogen networks across the European Union. Eurogas therefore recommends amending Annex III and Article 12 accordingly to ensure equal representation across all the European energy networks.

Article 11(8)

Should Article 11(1a) be retained as proposed by the European Parliament, Eurogas considers Article 11(8) may no longer be required. The sensitivity analyses foreseen under the Union Strategic Scenario (Article 11(1a (iii)) would already fulfil the purpose of regular scenario testing, while ensuring that this exercise remains integrated within the broader planning framework rather than being carried out exclusively by the Commission.

Article 12(2)(d)

Eurogas supports the European Parliament's proposal to strengthen infrastructure needs identification reports by requiring consideration of interactions, trade-offs and synergies across energy sectors, as well as the impacts of climatic zones, seasonality, and local and national circumstances. This proposal better reflects the diversity of European energy systems and supports more robust infrastructure planning.

Article 12(2)(db)

Eurogas supports the European Parliament's proposal to include forward-looking climate and extreme weather risk scenarios in infrastructure needs identification reports. The consideration of non-wire and digital solutions to prevent system failures would help promote more resilient, flexible and cost-effective infrastructure planning in a context of increasing climate-related risks. The potential of renewable gases for seasonal storage shall be taken into account as well.

Article 14(a)

Eurogas cautions towards the European Parliament's proposal of a "comprehensive framework assessment" associated with the Union Strategic Scenario before its objectives, governance structure, methodology and policy implications have been clearly defined. Any such assessment should remain technology-neutral and evaluate the contribution of electricity, gas, biomethane, hydrogen and CO2 development pathways, on an equal basis. In the absence of such safeguards, Eurogas would favour the Commission's and Council's approach not to include this provision, as the repercussions of these additional scenarios remain unclear.

Annex II

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Eurogas supports the European Parliament's proposal, in particular the inclusions of point (aa) and (b) in paragraph 2, which recognise the important role of hydrogen import and dispatch terminals and connected hydrogen storage facilities in the development of an integrated European hydrogen network.

However, to fully realise the benefits of this broader scope, **Eurogas recommends maintaining the existing 50 MW eligibility threshold.** Increasing the threshold could exclude many viable hydrogen projects, including phased developments, industrial clusters and regional hubs that are essential for the gradual development of the hydrogen market. Should the 50 MW threshold not be retained, Eurogas would favour the Council's proposed threshold of 150 MW over lower alternatives.

Annex III

Eurogas expresses a preference for the European Parliament's proposal, which broadens project eligibility criteria by introducing the concept of "sufficient project maturity" supported by a non-exhaustive list of milestones. This approach provides greater flexibility while maintaining appropriate safeguards regarding project readiness.

Eurogas also supports the Parliament's proposal under paragraph 4a, as it expands the range of projects eligible for consideration and better reflects the diversity of infrastructure solutions required to achieve the Union's energy and climate objectives. The proposal therefore provides a broader and more flexible eligibility framework, allowing a wider spectrum of projects to be considered.

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