

TEN-E

Eurogas input and suggestion of amendments

Contents

Recital (53 new) 3

Article (new) 3

Article 2 – paragraph 9 4

Article 3 – paragraph 5 4

Article 4 – paragraph 3 – point c 5

Article 4 – paragraph 3 – point d 5

Article 4 – paragraph 3 – point d – point i 6

Article 4 – paragraph 3 – point e – point i 7

Article 4 – paragraph 3 – point f 7

Article 12 – paragraph 1 8

Article 12 – paragraph 3 8

Article 16 – paragraph 1 10

Annex I – paragraph 3 – point 8 10

Annex I – paragraph 3 – point 9 11

Annex I – paragraph 3 – point 10 12

Annex I – paragraph 3 – point 13 13

Annex I – paragraph 4 – point 12 13

Annex II – paragraph 2 – point a 14

Annex II – paragraph 3 – point a 15

Annex II – paragraph 3 – point b 15

Annex II – paragraph 3 – point b 15

Annex II – paragraph 4 – point a 16

Annex II – paragraph 5 – point a 17

Annex III – paragraph 1 – point 1 17

Annex IV – paragraph 1 – point d (new) 18

Annex IV – paragraph 1 – point e 19

Annex IV – paragraph 1 – point g 19

Annex IV – paragraph 2 – point i 19

Annex IV – paragraph 5 – point a 20

Annex IV – paragraph 6 – point b 21

Annex IV – paragraph 6 – point c 21

Annex IV – paragraph 7 – point a 22

Annex IV – paragraph 7 – point c 22

Proposal for a regulation

Recital (53 new)

Text proposed by the Commission

Amendment

(53 new) Due to the withdrawal of the United Kingdom from the European Union, Ireland now constitutes a geographically limited area that it is no longer directly connected to the interconnected system of any other Member State. Therefore, infrastructure projects in Ireland are currently unable to fulfil the cross-border criteria required for projects of common interest or projects of mutual interest. The geographical limitation of Ireland should be taken into account when assessing the eligibility of project applications.

Proposal for a regulation

Article (new)

Text proposed by the Commission

Amendment

(new) Projects applications originating in Ireland may derogate from Article 4.1 (c) and Annex IV as regards the cross-border criteria and/or requirement for involvement of at least two Member States , provided however that such projects fulfill the conditions as laid down in Article 4.1 (a). and 4.1 (b) and demonstrate that the project in question is an essential part of a planned priority corridor or thematic area. This derogation shall automatically expire from the date when Ireland is directly connected to the interconnected system of any Member State.

Proposal for a regulation

Article 2 – paragraph 9

Text proposed by the Commission

(9) ‘smart gas grid’ means a gas network that makes use of innovative digital solutions to integrate in a cost efficient manner a plurality of low-carbon and renewable gas sources in accordance with consumers’ needs and gas quality requirements in order to reduce the carbon footprint of the related gas consumption, enable an increased share of renewable and low-carbon gases, and create links with other energy carriers and sectors;

Amendment

(9) ‘smart gas grid’ means a gas network that makes use of innovative digital solutions to integrate in a cost efficient manner a plurality of low-carbon, **decarbonised** and renewable gas sources in accordance with consumers’ needs and gas quality requirements in order to reduce the carbon footprint of the related gas consumption, enable an increased share of renewable, **decarbonised** and low-carbon gases, and create links with other energy carriers and sectors **thereby providing strengthened security of supply and flexibility to the energy system;**

Justification

Extension to low-carbon and decarbonised hydrogen will ensure that TEN-E covers and integrates the transport and distribution of all forms of hydrogen which will be required to deliver on the objective of climate neutrality by 2050. Increased coordination between energy vectors can ensure higher security of supply and increase flexibility of the overall energy system.

Proposal for a regulation

Article 3 – paragraph 5

Text proposed by the Commission

(5) The Commission shall, when adopting the Union list on the basis of the regional lists:
(a) ensure that only those projects that fulfil the criteria referred to in Article 4 are included;
(b) ensure cross-regional consistency, taking into account the opinion of the Agency for the Cooperation of Energy

Amendment

(5) The Commission shall, when adopting the Union list on the basis of the regional lists:
(a) ensure that only those projects that fulfil the criteria referred to in Article 4 are included; **and, for a transitional period, allow for the development of natural gas PCIs included in the 4th and 5th PCI list provided (i) they have reached an advanced**

Regulator ('the Agency') as referred to in point (12) of Section 2 of Annex III;
(c) take into account the opinions of Member States as referred to in point (9) of Section 2 of Annex III;
(d) aim for a manageable total number of projects of common interest on the Union list.

or mature stage by the entry into force of this regulation and (ii) they can prove their readiness to transport renewable or low carbon gases, including hydrogen.

(b) ensure cross-regional consistency, taking into account the opinion of the Agency for the Cooperation of Energy Regulator ('the Agency') as referred to in point (12) of Section 2 of Annex III;
(c) take into account the opinions of Member States as referred to in point (9) of Section 2 of Annex III;
(d) aim for a manageable total number of projects of common interest on the Union list.

Justification: Natural gas projects that will be included in the 5th PCI list, and which will have reached an advanced or mature stage while also promoting the use of renewable or low carbon gases, including hydrogen, should for a transitional period, remain eligible for PCI status, since they can contribute to the energy transition and achievement of the EU's climate neutrality objectives goals.

Proposal for a regulation

Article 4 – paragraph 3 – point c

Text proposed by the Commission

Amendment

(c) for carbon dioxide transport projects falling under the energy infrastructure categories set out in point (5) of Annex II, the project is to contribute significantly to all of the following specific criteria:

(c) for carbon dioxide **capture**, transport **and utilisation or storage** projects falling under the energy infrastructure categories set out in point (5) of Annex II, the project is to contribute significantly to all of the following specific criteria:

Justification

To extend the scope from carbon dioxide transportation to cover the entire value chain from capture to utilisation and storage in line with the amendment of Annex II paragraph 5, point a.

Proposal for a regulation

Article 4 – paragraph 3 – point d

Text proposed by the Commission

Amendment

(d) for hydrogen projects falling under the

(d) for hydrogen projects falling under the

energy infrastructure categories set out in point (3) of Annex II the project is to contribute significantly to sustainability, including by reducing greenhouse gas emissions, by enhancing the deployment of renewable hydrogen and supporting variable renewable power generation by offering flexibility and/or storage solutions. Furthermore, the project is to contribute significantly to at least one of the following specific criteria:

energy infrastructure categories set out in point (3) of Annex II the project is to contribute significantly to sustainability, including by reducing greenhouse gas emissions, by enhancing the deployment of renewable, **decarbonised and low-carbon** hydrogen and supporting variable renewable power generation **and system-wide security of supply** by offering flexibility and/or storage solutions. Furthermore, the project is to contribute significantly to at least one of the following specific criteria:

Justification

Extension to low-carbon and decarbonised hydrogen will ensure that TEN-E covers and integrates the transport and distribution of all forms of hydrogen which will be required to deliver on the objective of climate neutrality by 2050. Increased coordination between energy vectors can ensure higher security of supply and increase flexibility of the overall energy system.

Proposal for a regulation

Article 4 – paragraph 3 – point d – point i

Text proposed by the Commission

(i) market integration, including by connecting existing or emerging hydrogen networks of Member States, or otherwise contributing to the emergence of an Union-wide network for the transport and storage of hydrogen, and ensuring interoperability of connected systems;

Amendment

(i) market integration, including by connecting existing or emerging hydrogen networks of Member States, or otherwise contributing to the emergence of an Union-wide network for the transport, **distribution and storage of hydrogen, including through blended portions of the network,** and ensuring interoperability of connected systems;

Justification

The inclusion of distribution network will guarantee that all end-users can be reached as all household consumers are connected at the distribution whilst large users are also to a large extent, and depending on countries, connected to the DSO level rather than the TSO infrastructure.

In addition, the blending of hydrogen in the existing grid, particularly at an early stage will be crucial to rollout easily and efficiently the hydrogen which will be produced, particularly in the perspective that electrolyzers are today and to a large extent, connected and producing at DSO level.

Proposal for a regulation

Article 4 – paragraph 3 – point e – point i

Text proposed by the Commission

(i) sustainability, including by reducing greenhouse gas emissions and enhancing the deployment of renewable hydrogen.

Amendment

(i) sustainability, including by reducing greenhouse gas emissions and enhancing the deployment of renewable hydrogen **and synthetic fuels**.

Justification

To indicate that electrolyzers can be used for synthetic fuels production.

Proposal for a regulation

Article 4 – paragraph 3 – point f

Text proposed by the Commission

(f) for smart gas grid projects falling under the energy infrastructure category set out in point (2) of Annex II, the project is to contribute significantly to sustainability by enabling and facilitating the integration of renewable and low-carbon gases, such as biomethane, or renewable hydrogen, into the gas distribution and transmission networks in order to reduce greenhouse gas emissions. Furthermore, the project is to contribute significantly to at least one of the following specific criteria:

Amendment

(f) for smart gas grid projects falling under the energy infrastructure category set out in point (2) of Annex II, the project is to contribute significantly to sustainability by enabling and facilitating the integration of renewable **decarbonised** and low-carbon gases, such as biomethane, **synthetic methane** or **renewable** hydrogen, **notably by blending these** into the gas distribution and transmission networks in order to reduce greenhouse gas emissions. Furthermore, the project is to contribute significantly to at least one of the following specific criteria:

Justification

To indicate that electrolyzers can be used for synthetic fuels production.

The blending of hydrogen in the existing grid, particularly at an early stage will be crucial to rollout easily and efficiently the hydrogen which will be produced, particularly in the perspective that electrolyzers are today and to a large extent, connected and producing at DSO level.

Proposal for a regulation
Article 12 – paragraph 1

Text proposed by the Commission

1. By [31 July 2022], the Agency, after having conducted an extensive consultation process involving the Commission and at least the organisations representing all relevant stakeholders, including the ENTSO for Electricity, the ENTSO for Gas, Union DSO entity, and relevant hydrogen sector stakeholders, shall publish the framework guidelines for the joint scenarios to be developed by ENTSO for Electricity and ENTSO for Gas. Those guidelines shall be regularly updated as found necessary.

The guidelines shall include the energy efficiency first principle and ensure that the underlying ENTSO for Electricity and ENTSO for Gas scenarios are fully in line with the latest medium and long-term European Union decarbonisation targets and the latest available Commission scenarios.

Justification

As the gas package revision is currently being impact assessed, and while Eurogas advocates for the creation of a gas DSO entity, in line with the body being created on the electricity side, we believe that a temporary involvement of gas DSO representatives in the discussion and planning phases related to TEN-E should be ensured, until such a time as a gas DSO entity is set up.

Proposal for a regulation
Article 12 – paragraph 3

Text proposed by the Commission

3. The ENTSO for Electricity and ENTSO for Gas shall invite the organisations representing all relevant stakeholders, including the Union

Amendment

1. By [31 July 2022], the Agency, after having conducted an extensive consultation process involving the Commission and at least the organisations representing all relevant stakeholders, including the ENTSO for Electricity, the ENTSO for Gas, Union DSO entity, **the Gas DSO entity represented by Gas DSO associations until it is set up**, and relevant hydrogen sector stakeholders, shall publish the framework guidelines for the joint scenarios to be developed by ENTSO for Electricity and ENTSO for Gas. Those guidelines shall be regularly updated as found necessary.

The guidelines shall include the energy efficiency first principle and ensure that the underlying ENTSO for Electricity and ENTSO for Gas scenarios are fully in line with the **Energy Union objectives**, the latest medium and long-term European Union decarbonisation targets and the latest available Commission scenarios.

Amendment

3. The ENTSO for Electricity and ENTSO for Gas shall invite the organisations representing all relevant stakeholders, including the Union

DSO entity and all relevant hydrogen stakeholders, to participate in the scenarios development process.

DSO entity, **the Gas DSO entity represented by Gas DSO associations until it is set up**, and all relevant hydrogen stakeholders, to participate in the scenarios development process.

Justification

As the gas package revision is currently being impact assessed, and while Eurogas advocates for the creation of a gas DSO entity, in line with the body being created on the electricity side, we believe that a temporary involvement of gas DSO representatives in the discussion and planning phases related to TEN-E should be ensured, until such a time as a gas DSO entity is set up.

Proposal for a regulation

Article 13 – paragraph 1

Text proposed by the Commission

1. Every two years the ENTSO for Electricity and the ENTSO for Gas shall publish and submit to the Commission and the Agency the infrastructure gaps reports developed within the framework of the Union-wide ten-year network development plans.

When assessing the infrastructure gaps the ENTSO for Electricity and the ENTSO for Gas shall implement the energy efficiency first principle and consider with priority all relevant non-infrastructure related solutions to address the identified gaps.

Prior to submitting their respective reports, the ENTSO for Electricity and the ENTSO for Gas shall conduct an extensive consultation process involving all relevant stakeholders, including the Union DSO entity, all relevant hydrogen stakeholders and all the Member States representatives part of the priority corridors defined in Annex I.

Amendment

1. Every two years the ENTSO for Electricity and the ENTSO for Gas shall publish and submit to the Commission and the Agency the infrastructure gaps reports developed within the framework of the Union-wide ten-year network development plans.

When assessing the infrastructure gaps the ENTSO for Electricity and the ENTSO for Gas shall implement the energy efficiency first principle, **ensure the Energy Union objectives are being applied**, and consider with priority all relevant non-infrastructure related solutions to address the identified gaps.

Prior to submitting their respective reports, the ENTSO for Electricity and the ENTSO for Gas shall conduct an extensive consultation process involving all relevant stakeholders, including the Union DSO entity, **the Gas DSO entity represented by Gas DSO associations until it is set up**, all relevant hydrogen stakeholders and all the Member States representatives part of the priority corridors defined in Annex I.

Justification

As the gas package revision is currently being impact assessed, and while Eurogas advocates for the creation of a gas DSO entity, in line with the body being created on the electricity side, we believe that a temporary involvement of gas DSO representatives in the discussion and planning phases related to TEN-E should be ensured, until such a time as a gas DSO entity is set up.

Proposal for a regulation

Article 16 – paragraph 1

Text proposed by the Commission

1. The efficiently incurred investment costs, which excludes maintenance costs, related to a project of common interest falling under the categories set out in points (1)(a), (b), (c) and (e) of Annex II and projects of common interest falling under the category set out in point (3) of Annex II, where they fall under the competency of national regulatory authorities, shall be borne by the relevant TSO or the project promoters of the **transmission** infrastructure of the Member States which the project provides a net positive impact, and, to the extent not covered by congestion rents or other charges, be paid for by network users through tariffs for network access in that or those Member States.

Amendment

1. The efficiently incurred investment costs, which excludes maintenance costs, related to a project of common interest falling under the categories set out in points (1)(a), (b), (c) and (e) of Annex II and projects of common interest falling under the category set out in point (3) of Annex II, where they fall under the competency of national regulatory authorities, shall be borne by the relevant TSO, **DSO** or the **relevant** project promoters of the infrastructure of the Member States **to** which the project provides a net positive impact, and, to the extent not covered by congestion rents or other charges, be paid for by network users through tariffs for network access in that or those Member States.

Justification

The inclusion of distribution network will guarantee that all end-users can be reached as all household consumers are connected at the distribution whilst large users are also to a large extent, and depending on countries, connected to the DSO level rather than the TSO infrastructure.

Proposal for a regulation

Annex I – paragraph 3 – point 8

Text proposed by the Commission

Amendment

(8) Hydrogen interconnections in Western Europe ('HI West'): hydrogen infrastructure enabling the emergence of an integrated hydrogen backbone connecting the countries of the region and addressing their specific infrastructure needs for hydrogen supporting the emergence of an EU-wide network for hydrogen transport.

Electrolysers: supporting the deployment of power-to-gas applications aiming to enable greenhouse gas reductions and contributing to secure, efficient and reliable system operation and smart energy system integration. Member States concerned: Austria, Belgium, Denmark, France, Germany, Ireland, Italy, Luxembourg, Malta, the Netherlands, Portugal, and Spain;

(8) Hydrogen interconnections in Western Europe ('HI West'): hydrogen infrastructure enabling the emergence of an integrated hydrogen backbone connecting the countries of the region and addressing their specific infrastructure needs for hydrogen supporting the emergence of an EU-wide network for hydrogen transport **and enabling end-user consumption in all sectors.**

Electrolysers: supporting the deployment of power-to-gas applications aiming to enable greenhouse gas reductions and contributing to secure, efficient and reliable system operation and smart energy system integration. Member States concerned: Austria, Belgium, Denmark, France, Germany, Ireland, Italy, Luxembourg, Malta, the Netherlands, Portugal, and Spain;

Justification

All end-users should be able to access renewable, decarbonised and low-carbon gas in order to feed efficient molecule-based solutions at the local level. To this end, the objective of TEN-E should be to guarantee the large-scale infrastructure, but also the local infrastructure necessary to connect the end-users, particularly in case grid extension are required compared to the existing system.

Proposal for a regulation

Annex I – paragraph 3 – point 9

Text proposed by the Commission

(9) Hydrogen interconnections in Central Eastern and South Eastern Europe ('HI East'): hydrogen infrastructure enabling the emergence of an integrated hydrogen backbone connecting the countries of the region and addressing their specific infrastructure needs for hydrogen supporting the emergence of an EU-wide network for hydrogen transport.

Electrolysers: supporting the deployment of

Amendment

(9) Hydrogen interconnections in Central Eastern and South Eastern Europe ('HI East'): hydrogen infrastructure enabling the emergence of an integrated hydrogen backbone connecting the countries of the region and addressing their specific infrastructure needs for hydrogen supporting the emergence of an EU-wide network for hydrogen transport **and enabling end-user consumption in all sectors.**

power-to-gas applications aiming to enable greenhouse gas reductions and contributing to secure, efficient and reliable system operation and smart energy system integration. Member States concerned: Austria, Bulgaria, Croatia, Cyprus, Czech Republic, Germany, Greece, Hungary, Italy, Poland, Romania, Slovakia and Slovenia;

Electrolysers: supporting the deployment of power-to-gas applications aiming to enable greenhouse gas reductions and contributing to secure, efficient and reliable system operation and smart energy system integration. Member States concerned: Austria, Bulgaria, Croatia, Cyprus, Czech Republic, Germany, Greece, Hungary, Italy, Poland, Romania, Slovakia and Slovenia;

Justification

All end-users should be able to access renewable, decarbonised and low-carbon gas in order to feed efficient molecule-based solutions at the local level. To this end, the objective of TEN-E should be to guarantee the large-scale infrastructure, but also the local infrastructure necessary to connect the end-users, particularly in case grid extension are required compared to the existing system.

Proposal for a regulation

Annex I – paragraph 3 – point 10

Text proposed by the Commission

(10) Baltic Energy Market Interconnection Plan in hydrogen ('BEMIP Hydrogen'): hydrogen infrastructure enabling the emergence of an integrated hydrogen backbone connecting the countries of the region and addressing their specific infrastructure needs for hydrogen supporting the emergence of an EU-wide network for hydrogen transport.

Electrolysers: supporting the deployment of power-to-gas applications aiming to enable greenhouse gas reductions and contributing to secure, efficient and reliable system operation and smart energy system integration. Member States concerned: Denmark, Estonia, Finland, Germany, Latvia, Lithuania, Poland and Sweden.

Justification

Amendment

(10) Baltic Energy Market Interconnection Plan in hydrogen ('BEMIP Hydrogen'): hydrogen infrastructure enabling the emergence of an integrated hydrogen backbone connecting the countries of the region and addressing their specific infrastructure needs for hydrogen supporting the emergence of an EU-wide network for hydrogen transport **and enabling end-user consumption in all sectors.**

Electrolysers: supporting the deployment of power-to-gas applications aiming to enable greenhouse gas reductions and contributing to secure, efficient and reliable system operation and smart energy system integration. Member States concerned: Denmark, Estonia, Finland, Germany, Latvia, Lithuania, Poland and Sweden.

All end-users should be able to access renewable, decarbonised and low-carbon gas in order to feed efficient molecule-based solutions at the local level. To this end, the objective of TEN-E should be to guarantee the large-scale infrastructure, but also the local infrastructure necessary to connect the end-users, particularly in case grid extension are required compared to the existing system.

Proposal for a regulation

Annex I – paragraph 3 – point 13

Text proposed by the Commission

(13) Smart gas grids: Adoption of smart gas grid technologies across the Union to efficiently integrate a plurality of renewable and low-carbon gas sources into the gas network, support the uptake of innovative solutions for network management and facilitating smart energy sector integration and demand response.

Member States concerned: all.

Justification

The blending of hydrogen in the existing grid, particularly at an early stage will be crucial to rollout easily and efficiently the hydrogen which will be produced, particularly in the perspective that electrolyzers are today and to a large extent, connected and producing at DSO level

Amendment

(13) Smart gas grids: Adoption of smart gas grid technologies across the Union to efficiently integrate a plurality of renewable and low-carbon gas sources into the gas network, **notably through their blending into the network**, support the uptake of innovative solutions for network management and facilitating smart energy sector integration and demand response.

Member States concerned: all.

Proposal for a regulation

Annex I – paragraph 4 – point 12

Text proposed by the Commission

(12) Cross-border carbon dioxide network: development of carbon dioxide transport infrastructure between Member States and with neighbouring third countries in view of the deployment of carbon dioxide capture and storage.

Amendment

(12) Cross-border carbon dioxide network: development of carbon dioxide transport, **and distribution**, infrastructure between Member States and with neighbouring third countries in view of the deployment of carbon dioxide capture and storage **or utilisation**.

Member States concerned: all;

Member States concerned: all;

Justification:

And distribution: Extend the scope to cover distribution and local networks such industrial consumers.

or utilisation: to extend the scope from CCS to CCU and CCS

Proposal for a regulation

Annex II – paragraph 2 – point a

Text proposed by the Commission

Amendment

(a) any of the following equipment or installation aiming at enabling and facilitating the integration of renewable and low-carbon gases (including biomethane or hydrogen) into the network: digital systems and components integrating ICT, control systems and sensor technologies to enable the interactive and intelligent monitoring, metering, quality control and management of gas production, transmission, distribution and consumption within a gas network. Furthermore, such projects may also include equipment to enable reverse flows from the distribution to the transmission level and related necessary upgrades to the existing network.

(a) any of the following equipment or installation aiming at enabling and facilitating the integration of renewable and low-carbon gases (including biomethane or hydrogen) **by blending it** into the network: digital systems and components integrating ICT, control systems and sensor technologies to enable the interactive and intelligent **integration**, monitoring, metering, quality control and management of gas production, transmission, distribution and consumption within a gas network, **notably by increasing the ability to blend different types of gas**. Furthermore, such projects may also include equipment to enable reverse flows from the distribution to the transmission level and related necessary upgrades to the existing network **as well as new grid connections for renewable, decarbonised and low-carbon gases production units**.

Justification

The inclusion of distribution network will guarantee that all end-users can be reached as all household consumers are connected at the distribution whilst large users are also to a large extent, and depending on countries, connected to the DSO level rather than the TSO infrastructure. In addition, the blending of hydrogen in the existing grid, particularly at an early stage will be crucial to rollout easily and efficiently the hydrogen which will be produced, particularly in the perspective that electrolyzers are today and to a large extent, connected and producing at DSO level.

Proposal for a regulation
Annex II – paragraph 3 – point a

Text proposed by the Commission

Amendment

(a) transmission pipelines for the transport of hydrogen, giving access to *multiple* network users on a transparent and non-discriminatory basis, *which mainly contains high-pressure hydrogen pipelines, excluding pipelines for the local distribution of hydrogen;*

(a) transmission **and distribution** pipelines for the transport of hydrogen, **aiming to give** access to **all** network users on a transparent and non-discriminatory basis;

Justification

The inclusion of distribution network will guarantee that all end-users can be reached as all household consumers are connected at the distribution whilst large users are also to a large extent, and depending on countries, connected to the DSO level rather than the TSO infrastructure. In addition, the blending of hydrogen in the existing grid, particularly at an early stage will be crucial to rollout easily and efficiently the hydrogen which will be produced, particularly in the perspective that electrolyzers are today and to a large extent, connected and producing at DSO level

Proposal for a regulation
Annex II – paragraph 3 – point b

Text proposed by the Commission

Amendment

(b) underground storage facilities *connected to the high-pressure hydrogen pipelines referred to in point (a);*

(b) underground **and local small-scale** storage facilities;

Justification

It should be ensured that decentralised storage connected to low-pressure DSO grids and allowing for a flexible and fluctuating management of gas quality levels in those grids, can be considered.

Proposal for a regulation
Annex II – paragraph 3 – point b

Text proposed by the Commission

Amendment

(d) any equipment or installation essential for the hydrogen system to operate safely, securely and efficiently or to enable bi-

(d) any equipment or installation essential for the hydrogen system, **included in blended portions of the network**, to operate safely,

directional capacity, including compressor stations.

Any of the assets listed in points (a), (b), (c), and (d) may be newly constructed assets or assets converted from natural gas dedicated to hydrogen, or a combination of the two.

securely and efficiently or to enable bi-directional capacity, including compressor stations.

Any of the assets listed in points (a), (b), (c), and (d) may be newly constructed assets or assets converted from natural gas dedicated to hydrogen, or a combination of the two.

Justification

Blending of hydrogen in the existing grid, particularly at an early stage will be crucial to rollout easily and efficiently the hydrogen which will be produced, particularly in the perspective that electrolyzers are today and to a large extent, connected and producing at DSO level.

Proposal for a regulation

Annex II – paragraph 4 – point a

Text proposed by the Commission

(a) electrolyzers that: (i) have at least 100 MW capacity, (ii) the production complies with the life cycle greenhouse gas emissions savings requirement of 70 % relative to a fossil fuel comparator of 94g CO₂e/MJ *as set out in Article 25(2) and Annex V of Directive (EU) 2018/2001 of the European Parliament and of the Council.*¹ Life cycle greenhouse gas emissions savings are calculated using the methodology referred to in Article 28(5) of Directive (EU) 2018/2001 or, alternatively, using ISO 14067 or ISO 14064-1. Quantified life-cycle GHG emission savings are verified in line with Article 30 of Directive (EU) 2018/2001 where applicable, or by an independent third party, and (iii) have also a network-related function;

Amendment

(a) electrolyzers that: (i) have at least 100 MW capacity, (ii) the production complies with the life cycle greenhouse gas emissions savings requirement of 60 % relative to a fossil fuel comparator of 91g CO₂e/MJ. Life cycle greenhouse gas emissions savings are calculated using the methodology referred to in Article 28(5) of Directive (EU) 2018/2001 or, alternatively, using ISO 14067 or ISO 14064-1. Quantified life-cycle GHG emission savings are verified in line with Article 30 of Directive (EU) 2018/2001 where applicable, or by an independent third party, and (iii) have also a network-related function;

Justification

Based on a LCA approach, the proposed threshold rules out certain production methods and energy sources used for the production of clean hydrogen, such as production of H₂ produced by electrolysis from solar electricity. Such restrictive criteria risks undermining the EU hydrogen

¹ OJ L 328, 21.12.2018, p. 82.

strategy, disincentivizing investments even if some green H2 production technologies. To ensure a supportive and cost-efficient approach is pursued, in line with the work undertaken by the Certifhy project, we suggest a 60% reduction in line with the objectives of the hydrogen strategy and climate neutrality towards 2050.

Proposal for a regulation

Annex II – paragraph 5 – point a

Text proposed by the Commission

Amendment

(a) dedicated pipelines, ***other than upstream pipeline network***, used to transport carbon dioxide from more than one source, i.e. industrial installations (including power plants) that produce carbon dioxide gas from combustion or other chemical reactions involving fossil or non-fossil carbon-containing compounds, for the purpose of permanent geological storage of carbon dioxide pursuant to Directive 2009/31/EC of the European Parliament and of the Council²;

(a) **all infrastructure and equipment, including** dedicated pipelines, used to transport carbon dioxide from more than one source, i.e. industrial installations (including power plants) that produce carbon dioxide gas from combustion or other chemical reactions involving fossil or non-fossil carbon-containing compounds, for the purpose of permanent geological storage of carbon dioxide pursuant to Directive 2009/31/EC of the European Parliament and of the Council³, **or for the purpose of carbon dioxide capture and utilisation;**

Justification:

All infrastructure and equipment including: All infrastructure and equipment to be developed should be covered. Notably, projects for carbon dioxide transportation via ships and trucks are relevant from a strategic point of view and allow higher economies of scale in view of future CCS hubs that should be considered as a priority at EU level.

or for the purpose of carbon dioxide capture and utilisation: to extend the scope from CCS to CCU and CCS

Proposal for a regulation

Annex III – paragraph 1 – point 1

Text proposed by the Commission

Amendment

(1) with regard to energy infrastructure falling under the competency of national regulatory authorities, each Group shall be composed of representatives of the Member States, national regulatory

(1) with regard to energy infrastructure falling under the competency of national regulatory authorities, each Group shall be composed of representatives of the Member States, national regulatory authorities, TSOs,

² OJ L 140, 5.6.2009, p. 114.

³ OJ L 140, 5.6.2009, p. 114.

authorities, TSOs, as well as the Commission, the Agency *and* the ENTSO for Electricity *or* the ENTSO for Gas, as relevant.

For the other energy infrastructure categories, each Group shall be composed of the representatives of the Member States, project promoters concerned by each of the relevant priorities designated in Annex I and the Commission

Justification

While the necessity to ensure interoperability of the network and the overall EU market shall be ensured, and whereas DSO and TSO cooperation is key to guarantee this, the requirements related to the involvement of DSOs and TSOs shall be flexible in order to adapt to overly prescriptive conditions for the projects which are being proposed.

DSOs, as well as the Commission, the Agency, the ENTSO for Electricity, the ENTSO for Gas, **the EU DSO Entity and the Gas DSO entity represented by Gas DSO associations until it is set up**, as relevant.

For the other energy infrastructure categories, each Group shall be composed of the representatives of the Member States, project promoters concerned by each of the relevant priorities designated in Annex I and the Commission

Proposal for a regulation

Annex IV – paragraph 1 – point d (new)

Text proposed by the Commission

(new)

Amendment

(da new) for hydrogen distribution the project enables the distribution of hydrogen to end-users and the connection of hydrogen production units at a decentralised level

Justification

The inclusion of distribution network will guarantee that all end-users can be reached as all household consumers are connected at the distribution whilst large users are also to a large extent, and depending on countries, connected to the DSO level rather than the TSO infrastructure. In addition, the blending of hydrogen in the existing grid, particularly at an early stage will be crucial to rollout easily and efficiently the hydrogen which will be produced, particularly in the perspective that electrolyzers are today and to a large extent, connected and producing at DSO level.

Proposal for a regulation
Annex IV – paragraph 1 – point e

Text proposed by the Commission

(e) for hydrogen storage or hydrogen reception facilities referred to in point (3) of Annex II, the project aims at supplying directly or indirectly at least two Member States;

Justification

Increased coordination between energy vectors can ensure higher security of supply and increase flexibility of the overall energy system.

Amendment

(e) for hydrogen storage or hydrogen reception facilities referred to in point (3) of Annex II, the project aims at supplying directly or indirectly, **by providing security of supply benefits**, at least two Member States;

Proposal for a regulation
Annex IV – paragraph 1 – point g

Text proposed by the Commission

(g) for smart gas grids, a project involves transmission system operators, transmission and distribution system operators or distribution system operators from at least two Member States. Distribution system operators *can be involved only with the support of* the transmission system operators, *of at least two Member States*, that are closely associated to the project and ensure interoperability.

Justification

While the necessity to ensure interoperability of the network and the overall EU market shall be ensured, and whereas DSO and TSO cooperation is key to guarantee this, the requirement related to the involvement of DSOs and TSOs shall be flexible in order to adapt to overly prescriptive conditions for the projects which are being proposed.

Amendment

(g) for smart gas grids, a project involves transmission system operators, transmission and distribution system operators or distribution system operators from at least two Member States. Distribution system operators **shall consult with the relevant** transmission system operators that are closely associated to the project and ensure interoperability **and non-discriminatory access to the networks**.

Proposal for a regulation
Annex IV – paragraph 2 – point i

Text proposed by the Commission

for projects of mutual interest in the category set out in point (3) of Annex II, the hydrogen project enables the transmission of hydrogen across *at* the border of a Member State with one or more third countries and proves bringing significant benefits, under the specific criteria listed in in Article 4(3), to at least two Member States. The calculation of the benefits for the Member States shall be performed and published by the ENTSO for Gas in the frame of Union-wide ten-year network development plan;

Justification

As the gas package revision is currently being impact assessed, and while Eurogas advocates for the creation of a gas DSO entity, in line with the body being created on the electricity side, we believe that a temporary involvement of gas DSO representatives in the discussion and planning phases related to TEN-E should be ensured, until such a time as a gas DSO entity is set up.

Proposal for a regulation

Annex IV – paragraph 5 – point a

Text proposed by the Commission

(a) Sustainability measured as the contribution of a project to: greenhouse gas emission reductions in different end-use applications, such as industry or transport; flexibility and seasonal storage options for renewable electricity generation; or the integration of renewable hydrogen.

Justification

The impact of gas-based solutions, notably those that help convert and store electricity, or wider production units for renewable, decarbonised and low-carbon gas installations can help decarbonise the gas system but also the power system by ensuring the adequate flexibility,

Amendment

for projects of mutual interest in the category set out in point (3) of Annex II, the hydrogen project enables the transmission **and distribution** of hydrogen **along or** across the border of a Member State with one or more third countries and proves bringing significant benefits, under the specific criteria listed in in Article 4(3), to at least two Member States. The calculation of the benefits for the Member States shall be performed and published by the ENTSO for Gas in the frame of Union-wide ten-year network development plan **in cooperation with the Gas DSO entity represented by Gas DSO associations until it is set up;**

Amendment

(a) Sustainability measured as the contribution of a project to: **direct or indirect** greenhouse gas emission reductions in different end-use applications, such as industry, **agriculture, heating** or transport; flexibility and seasonal **and short-term** storage options for renewable electricity generation; or the integration of renewable hydrogen.

security of supply and backup required to deal with increased intermittent renewable power generation. The inclusion of the heating sector as a vital to decarbonise sector requiring all existing solutions in order to decarbonise by 2050, including the consumption of hydrogen in individual and building-wide power and heat generation units (Fuel cells or individual boilers).

Proposal for a regulation

Annex IV – paragraph 6 – point b

Text proposed by the Commission

Amendment

(b) quality and security of supply measured by assessing the ratio of reliably available gas supply and peak demand, the share of imports replaced by local renewable and low-carbon gases, the stability of system operation, the duration and frequency of interruptions per customer.

(b) quality and security of supply measured by assessing the ratio of reliably available gas supply and **system-wide** peak demand, the share of imports replaced by local renewable and low-carbon gases, the stability of system operation, the duration and frequency of interruptions per customer.

Justification

While sector integration can significantly reduce costs for the overall energy system in achieving the climate neutrality objective, the additional benefit in terms of optimising energy use and transport/distribution or on the reduction of emissions through certain end-uses, should be underlined and accounted for.

Proposal for a regulation

Annex IV – paragraph 6 – point c

Text proposed by the Commission

Amendment

(c) facilitation of smart energy sector integration measured by assessing the cost savings enabled in connected energy sectors and systems, such as the heat and power system, transport and industry.

(c) facilitation of smart energy sector integration measured by assessing the cost **and greenhouse gas emission savings and efficient use of energy** enabled in connected energy sectors and systems, such as the heat and power system, transport, **agriculture** and industry.

Justification

To clarify the text and ensure that savings are not only limited to costs aspects.

Proposal for a regulation
Annex IV – paragraph 7 – point a

Text proposed by the Commission

(a) sustainability measured by assessing the share of renewable hydrogen *or* hydrogen meeting the criteria defined in point (4) (a) (ii) of Annex II integrated into the network, and the related greenhouse gas emission savings;

Amendment

(a) sustainability measured by assessing the share of renewable hydrogen, hydrogen meeting the criteria defined in point (4) (a) (ii) of Annex II **or synthetic methane** integrated into the network, and the related greenhouse gas emission savings;

Justification

To indicate that electrolyzers can be used for synthetic methane production.

Proposal for a regulation
Annex IV – paragraph 7 – point c

Text proposed by the Commission

(c) the facilitation of smart energy sector integration measured by assessing the cost savings enabled in connected energy sectors and systems, such as the gas, hydrogen, power and heat networks, the transport and industry sectors, and the volume of demand response enabled.

Amendment

(c) the facilitation of smart energy sector integration measured by assessing the cost, **and greenhouse gas savings and the efficient use of energy** enabled in connected energy sectors and systems, such as the gas, hydrogen, power and heat networks, the transport and industry sectors, and the volume of demand response enabled.

Justification

To clarify the text and ensure that savings are not only limited to costs aspects.