

Eurogas feedback on TEN-E roadmap

Eurogas would like to welcome the roadmap looking at a potential revision of the TEN-E regulation, and the possibility to provide input at this early stage.

As is rightly underlined in the roadmap document, the *“TEN-E Regulation’s key objectives are the timely construction of projects which interconnect the energy markets across Europe, thereby facilitating a final impact of improved sustainability (via the better integration of renewable energy sources), better security of supply and improved competition within markets that keeps prices in check.”* Considering the above, the development of new dynamics in the gas market due to sectoral integration and as the TEN-E directly impacts PCIs and the cross-border cost allocation element we believe that certain points could be further emphasized in the roadmap;

1. Eurogas considers the TEN-E and its offshoots such as the PCI or CEF as important cornerstone to complete the internal market for gas and to provide secure, affordable and sustainable energy to consumers. The latter energy union objectives could be further underlined in the roadmap as critical in building the future energy system.
2. As PCIs may be restricted to single Member States, if they have significant cross-border impacts, we would suggest assessing whether the financing of renewable and decarbonised gas production projects through the TEN-E and related funding opportunities such as the CEF would contribute to the achievement of EU objectives. Indeed, this could dramatically improve security of supply in that area and may also provide additional flexibility to an interconnected energy system through gas-to-power (biogas/methane or green/blue hydrogen for example) or power-to-gas conversion/production units. When assessing the level of achievement of TEN-E objectives, due account should therefore be taken of possible positive externalities of PCIs on other parts of the energy system.
3. As is well noted in the roadmap, TEN-E should support the timely implementation of energy transmission and distribution landscapes of tomorrow, we would suggest that an assessment should also consider the potential of smart gas grids and further digitalisation of the gas grid as way to deal with evolutions in flows and gas qualities and to provide final customers with additional information on their consumption.
4. Considering the increasing move towards a decentralized system of energy production, through renewable gas produced at the local level, Eurogas would recommend including Distribution System Operators in the list of main stakeholders.
5. The roadmap adequately identifies the need to consider the coherence of the TEN-E with “EU energy and climate targets for 2030, the EU long-term decarbonisation commitment, and the energy efficiency first principle”. We believe that the assessment should also consider the key principles of affordability and a “just transition”.

We wish to underline that Eurogas and its experts remain available for any further questions or clarification and that we look forward to providing feedback to the final report.