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Eurogas discussion paper the gas package (2020)



Eurogas is the association representing the European gas wholesale, retail and distribution sectors. Founded in 1990, its members are 44 companies and associations from 22 countries.

Eurogas represents the sectors towards the EU institutions and, as such, participates in the Madrid Gas Regulatory Forum, the Gas Coordination Group, the Citizens Energy Forum and other stakeholder groups.

Its members work together, analysing the impact of EU political and legislative initiatives on their business and communicating their findings and suggestions to the EU stakeholders.

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Eurogas welcomes the European Commission's intention to prepare a gas package to address new opportunities and issues in relation to natural, renewable and decarbonised gas. Eurogas has developed the following preliminary ideas and discussion points, clustered according to the pillars for the gas package that the Commission has indicated.

1. Sector integration
2. Renewable and decarbonised gas
3. Future gas market regulation, including mirroring.

Eurogas proposes a number of policy initiatives, some of which will require further elaboration as discussions develop.

Key policy asks

1. Sector integration

- 1.1. The Commission to develop an EU-level sector integration vision
- 1.2. Obligation for joint gas/electricity infrastructure planning to take an integrated system view
- 1.3. Widen the scope of the European assessment for life-cycle GHG emissions and GHG avoidance cost and publish results

2. Renewable and decarbonised gas

- 2.1. Introduce an EU target for renewable and decarbonised gases
- 2.2. Develop a European blueprint for Guarantees of Origin (GOs)
- 2.3. Open the European GO scheme to non-EU certificates and carbon offset products
- 2.4. The Commission to conduct a study on the market potential for cost-effective exploitation of different forms of r-gas and d-gas
- 2.5. Further develop the European framework for r-gas and d-gas support schemes
- 2.6. Market design to enable r-gas and d-gas to reach maturity and deployment at scale, and to be integrated into the wholesale market
- 2.7. Quantify the advantages of biogas/biomethane in terms of reducing agricultural methane emissions
- 2.8. Favour gasification and digestion over the incineration of waste
- 2.9. Enable the development of carbon capture and storage value chains

3. Future gas market regulation, including mirroring

- 3.1. Definition of the roles and responsibilities of market participants
- 3.2. Policy-makers to be open to smart and flexible gas solutions both in relation to retail and distribution
- 3.3. Ensure appropriate processes for gas customer empowerment and customer communication processes
- 3.4. Phase out price regulation
- 3.5. Wholesale market design: regulatory framework for transmission and storage infrastructure; review of governance for implementation, enforcement and assessment of competition beyond formal compliance to rules
- 3.6. DSO Entity: Have an entity for electricity and an entity for gas
- 3.7. The Commission to recognise in the TYNDP process the important role of gas DSOs in managing flexibility

1. Sector integration

Sector integration (sometimes also called sector coupling) is the holistic view and connection of the different sectors of the energy system: electricity, heat and transport, including the corresponding infrastructure in power, gas and district heating.

Using the virtues of both electricity and gas is the best and fastest way to create a sustainable low-carbon economy. The smart combination of the electricity, gas and heat systems can deliver early achievements, allow more renewables, lower costs and increase system resilience. It is crucial that the Commission develop an EU-level sector integration vision for combining electricity, heat and transport, and including the corresponding infrastructure in power, gas and district heating.

Gas is already providing sector integration: cutting-edge gas technologies, such as power-to-gas and fuel cells, provide solutions for creating the low-carbon energy world of the future. The Eurogas scenario study with PRIMES calculated that a higher share of gas – natural, decarbonised and renewable – in the energy mix saves up to €335bn in infrastructure investments between 2015 and 2050 compared with an all-electric scenario. Other recent major studies reach similar conclusions on the importance of sector integration and of gas in the energy transition.

Technology openness is necessary to enable the successful development of an intensified and highly efficient sector integration. Electrification will play an important role in the energy transition, but it is not a goal in itself. Gaseous fuels will continue to be the reliable backbone of the energy system through the transition. Having electricity as the only basis of the future energy system will mean dependence on just one infrastructure. Gas will still be needed to complement and facilitate the decarbonisation of other economic sectors, in particular heavy industry and heavy goods transport and shipping.

A sector-integrated approach to infrastructure planning needs to accompany a wider holistic energy system vision. Consideration of the role of gas infrastructure within the overall energy system Ten Year Network Development Plan process will help society to maximise the opportunities linked to existing, largely depreciated assets. This in turn can help to reduce issues of public acceptance for new electricity infrastructure.

Gas has significant potential to reduce CO₂ emissions and improve air quality on land and at sea. In line with EU climate objectives as well as environmental sustainability goals and the circular economy, a technology-neutral whole life-cycle approach that focuses on GHG emissions outcomes can provide a fair level playing field for all technologies.

1.1. Commission to develop an EU-level sector integration vision

Eurogas asks the Commission to develop a vision for the integrated energy system of the future: combining electricity, heat and transport, and including the corresponding infrastructure in power, gas and district heating. This will have the objective of optimising efficiency, costs and energy system resilience.

The vision should:

- Address how to value the resilience of the gas system in supporting the resilience of the energy system as a whole.

- Include drawing up pathways for the development of power-to-gas technology (P2G) and for the development of carbon removal technology, for example pre-combustion CCS. The pathways will include an enabling plan, making available dedicated resources where these are necessary to support innovation and immature technologies, in particular taking into account the scarcity of low-carbon technology solutions in key sectors of the economy, such as heavy industry.
- Consider the potential to optimise heat sources in buildings, for example hybrid systems of gas (natural, decarbonised or renewable) and other renewable and electric technologies. This analysis will need to take account of existing infrastructure, the diversity in regional energy resources, and the multiple ways in which demand response can be provided by gas – both in end use systems and in power generation – to bring a source of flexibility to the electricity system, in particular as that system increasingly relies on variable renewable generation sources. In this context, an enabling plan for smart gas solutions should also ensure that these can benefit from innovation funding.
- Consider the potential for sector coupling and for gas in transport, particularly in shipping and in heavy duty vehicles in transport.

The vision and related proposals should make use of the full analytic toolkit that informs EU policy: quantitative and qualitative assessment, reference scenarios and narratives, and a full system cost approach.

1.2. Obligation for joint gas/electricity infrastructure planning to take an integrated system view

The increasing importance of links between gas and electricity infrastructure shall be reflected in a new requirement for joint infrastructure planning in TYNDPs, at both European and national levels. Future TYNDPs will include power-to-gas and other options together with a cost-benefit analysis. For example, this would mean that before investing in new electricity transmission for debottlenecking, it will first be checked if existing gas pipeline assets and power-to-gas plants could solve the issue at lower cost, in particular taking account of the marginal avoided cost of electricity capex.

This updated approach to infrastructure planning will help to ensure that new infrastructure and existing gas assets are useful, increasingly with decarbonised and renewable gas, to achieve the energy transition.

1.3. Widen the scope of the European assessment for life-cycle GHG emissions and GHG avoidance cost and publish these results

Reduction of EU GHG emissions can be fostered by creating greater transparency for policy-makers and consumers on the sources of emissions by means of full life-cycle emissions analysis. This assessment could calculate and publish data on CO₂ and other GHG avoidance and abatement costs, for example, based on life-cycle emissions calculations for well-to-wheel emissions in different mobility technologies; for biogas/biomethane in terms of reducing agricultural methane emissions; and for different energy storage technologies, including power-to-gas and batteries. The results of the assessment and the publication could be for use by policy-makers and could be established by the EC under the European Environment Agency and JRC.

The gas sector considers that it has a good starting point for this sort of transparency in its existing work on methane leakage.

2. Renewable and decarbonised gas

Renewable gas is the category name for CO₂-neutral gases, including biogas and biomethane, green hydrogen and synthetic methane from power-to-gas. Decarbonised gas is the category name for CO₂-neutral gas produced from natural gas with CCS/U.

Renewable gas can be produced from various feedstocks: electricity from variable renewable sources at times when supply exceeds demand; municipal waste; agricultural residues; sewage. Innovative technologies that produce r-gas and d-gas and that inject it into the grid are already being developed throughout Europe. These should be further incentivised as their availability to deploy at scale will help the EU to achieve a higher share of renewable energy at lower cost.

Eurogas is looking for a clear path forward for gas to help deliver the long-term EU energy transition. Eurogas members are therefore in favour of policies supporting the EU objectives under the UN Paris Agreement, including three integrated elements: an EU-wide target for renewable and decarbonised gas, Guarantees of Origin for r-gas and d-gas under RED II, and a harmonised European framework for r-gas and d-gas support schemes. The details of this approach would need to be carefully developed. Eurogas also supports the scale-up of CCS in the energy system in order to reduce the overall cost of capture and storage, so that the technology becomes a viable option for decarbonisation.

Establishing the long-term decarbonisation potential of natural gas makes current investments in gas technology and gas infrastructure remain warranted. These assets will not be stranded, as there is an opportunity to convert them for transportation of renewable gas, hydrogen and CO₂.

Numerous studies show that the 2050 decarbonisation targets can be reached most cost-effectively with an increasing share of renewable and decarbonised gas in a cost-efficient way. CO₂-neutral gas has particularly strong advantages in enabling industry to decarbonise their energy-intensive heat processes: an important factor for reaching EU goals on climate and on industrial competitiveness. Decarbonisation of space heating is possible using r-gas/d-gas with existing heating systems without major refurbishments. However, more clarity in Commission analyses on the market potential for these resources is also essential in order for r-gas and d-gas to develop at the necessary pace and scale to deliver emissions outcomes in line with EU commitments.

2.1. Introduce an EU target for renewable and decarbonised gases

Eurogas calls for the definition of a binding target at EU level for renewable and decarbonised gases, based on the existing EU renewable energy target and to be established within National Energy and Climate Plans as a sub-target to the revised Renewable Energy Directive (REDII). The target should be time-limited with the objective of enabling r-gas and d-gas to reach technology maturity and scale. It should encompass both r-gas and d-gas on a technology-neutral basis. Delivery of the target should be based on market measures such as tendering.

A target can help to create a predictable environment for innovation and investment. Eurogas would like to discuss with the Commission possible options for how the target could be calculated, the obligated parties, the target size, and support mechanisms.

2.2. Develop a European blueprint for Guarantees of Origin (GOs)

Guarantees of Origin making the source of the specific renewable and decarbonised energy transparent to the customer can prove that the new r-gas and d-gas gas target is being delivered. Under RED II, GOs will become mandatory for renewable electricity and gas in all Member States. The various national standards for GOs should be harmonised over time according to a European blueprint, which should be developed in cooperation with the gas industry.

Eurogas would like to discuss a timeline for European harmonisation to enable the cross-border transferability and tradability of GOs in order to increase competition and transparency and to lower the prices of r-gas/d-gas. It will also be important to encourage small projects, and to avoid stifling them with administrative and financial burdens.

2.3. Open the European GO scheme to non-EU certificates and carbon offset products

Eurogas sees large potential for GOs and carbon offset projects to help non-EU countries to achieve their commitments under the Paris Agreement. At a later stage and based on strong monitoring, reporting and verification (MRV) and adequate international harmonisation, Eurogas supports the possibility for non-EU GOs offset certificates to be counted against European targets.

2.4. The Commission to conduct a study on the market potential for cost-effective exploitation of different forms of r-gas and d-gas

The Commission should carry out a study on the market potential for renewable and decarbonised gas alongside the work on the sector integration vision. Eurogas stands ready to input to this exercise. The study should consider the different prices of the different forms of gas, including hydrogen from natural and renewable sources. It should consider and compare different scenarios of cost development and different scenarios for r-gas and d-gas usage (both for dedicated supply and injection into the gas network), together with the associated costs for upgrading existing gas infrastructure for the injection of hydrogen. The study should ultimately explore potential development pathways for the different forms of r-gas and d-gas. Furthermore, the study should consider what funding may be necessary to make the development of scalable renewable and decarbonised gas competitive.

2.5. Further develop the European framework for r-gas and d-gas support schemes

Current support schemes are in the remit of Member States with certain conditions being set by EU State Aid Guidelines. The further development of an EU framework would harmonise the existing schemes, reduce market distortions, and could spur sector development across Europe. A well-designed support scheme can help to achieve EU objectives. It can give incentives and provide a stable environment for investors. Developing a framework of r-gas and d-gas support schemes can also be beneficial to the agricultural sector and can contribute

to the circular economy (through waste management). This harmonisation process should reflect the EU target and analysis of market potential.

The European framework should give consideration to:

- The fact that r-gas/d-gas is generally less developed than renewable electricity
- The case for technology-specific support mechanisms and the setting up of EU funding mechanisms to promote renewable and decarbonised gas, such as a special EU investment fund
- Developing a European blueprint, e.g. a contract for difference with tender for premium for large installations
- Developing EU guidelines on how the costs for support schemes shall be recovered (e.g. taxes, specific or general consumption levies), considering integration in market design
- Avoiding overlap of support schemes with tradable GOs
- Incentivising uses of biogas, including gas production for electricity generation and the injection of biomethane into the grid
- A “best practice” dialogue to learn from existing schemes in Member States both in order to spur the development of r-gas and d-gas projects and to help create a level-playing field between Member States

2.6. Market design to enable r-gas and d-gas to reach maturity and deployment at scale, and to be integrated into the wholesale market

Market design has been used to help renewable electricity to reach maturity and deployment at scale. The Commission should review the aspects of wholesale market design that today favour renewable electricity in light of an r-gas and d-gas target.

Fair competition will enable more options for achieving decarbonisation at lower cost to the consumer. Market design has to be aligned with the elements essential to deliver on EU objectives. Points for discussion include facilitative requirements for r-gas/d-gas in daily balancing for an initial period, the removal of levies that support only renewable electricity, and how r-gas and d-gas can be integrated into the wholesale market as these resources mature.

2.7 Quantify the advantages of biogas/biomethane in terms of reducing agricultural methane emissions

The agricultural sector emits substantial volumes of methane, which can be (partially) avoided by converting residues to biogas/biomethane. These advantages need to be quantified and considered in EU GHG reduction targets, also in order to help the agriculture sector to decarbonise.

Default pathways exist in RED II within which it would be possible to calculate individual alternative pathways in case there is a particular feedstock mix to be tested with a certain proportion of manure, waste, cover crop, etc.

2.8 Favour gasification and digestion over the incineration of waste

A large share of EU waste is currently incinerated. Waste gasification and digestion are an important source for biogas that is currently largely untapped and should be considered in the context of wider policies on the circular economy. Consideration should be given to the removal of barriers preventing optimal use of gasification in waste management and the implementation of the circular economy.

2.9. Enable the development of carbon capture and storage value chains

CCS is one of the key enabling technologies to achieve a low-carbon economy. The gas industry would like to work with the EU institutions to develop a stepwise decarbonisation pathway such that CCS value chain investments can be spread over time at the pace that different Member States can afford.

3. Future gas market regulation, including mirroring

Some elements of the current gas market framework can be improved. In some areas and in order to maintain a level playing field, consistency across electricity and gas market design legislation is also important, for example regarding customer relations for efficiency and cost effectiveness, and to simplify common grid development. Updating appropriate aspects of the gas market framework can benefit consumers.

The traditional roles of market participants have changed with liberalisation and are changing further due to sector integration (e.g. gas infrastructure will play an integral role in ensuring security of supply in the electricity sector). Coupling in retail market services and products can also result in changing roles. Roles and responsibilities might need to be adapted and redefined for the future market design.

Unlike electricity grids, gas grids are naturally capable of managing high energy demand fluctuation. They are a powerful tool to provide flexibility to the energy system in the EU and to contribute to a more decarbonised and sustainable European energy sector. Seasonal storage is an issue that cannot be tackled by the electricity sector on its own.

A smart and flexible gas offer will give choice and options for customers. Customers will benefit from innovative and more efficient ways of using gas, for example in hybrid heating systems, including those facilitated by micro-CHP and fuel cells. CHP gas customers can also become prosumers.

3.1. Definition of the roles and responsibilities of market participants

As new markets take shape, the principles of a robust market in which suppliers meet the demand for new products and services and grid operators are market facilitators should be maintained. If, however, the market is not reacting and developing autonomously because there is not enough appetite to kick-start some activities (for example gas fuelling stations for road vehicles and CNG/LNG/renewable gas storage), a role could be envisaged for other interested parties, including network operators, to own and develop these assets, for a limited period, with new revenue streams linked to this market facilitator role.

This role for network operators should be subject to appropriate regulatory oversight, with clear principles/criteria to determine the degree of contestability in an agreed set of activities. Similar to the proposed electricity provisions in the Clean Energy Package,¹ these new activities should only be done by gas grid operators if other parties, following an open and transparent tendering procedure, have not expressed an interest to carry out those activities. A regular market test should monitor whether the market situation is evolving and establish exit conditions.

3.2. Policy-makers to be open to smart and flexible gas solutions both in relation to retail and distribution

The “smart and flexible” use of energy is today mostly associated with electricity. This can underestimate the potential for some market-friendly smart technologies also to be employed in the gas sector, for example smart controls as part of hybrid heating systems combining gas boilers and heat pumps. Opportunities for smartness and digitalisation in gas need specifying in EU policy – also where these are different from electricity.

3.3. Ensure appropriate processes for gas customer empowerment and customer communication processes

Eurogas supports customer empowerment facilitated through clear innovative communications tools that can enable active market participation. However, care should be taken not to follow the outcome of the Electricity Directive where it is not technically appropriate to gas processes – and therefore will not benefit the consumer, while imposing administrative costs.

Some points can only be definitively assessed when the final electricity market text is known. Current assessment is that the following would be appropriate for mirroring: The sensible refinement of the provision on switching fees, high-quality comparison tools, Alternative Dispute Resolution (ADR), basic contractual rights, and billing. Mirroring on other points would be unwelcome, notably harmonised data formats. Points such as requirements of closing bill dispatch and information provisions are a matter of concern. 24-hour switching may be useful, subject to technical feasibility. In the view of Eurogas, other provisions on smart metering should not be mirrored.

3.4. Phase out price regulation

Price regulation in gas retail markets still exists in many countries or is even being reintroduced (for example in the UK). Gas and electricity regulated prices should be phased out. If the two are not done at the same time, the market will be distorted. Mechanisms such as social tariffs should be maintained only where duly justified.

¹ Provisional as the CEP is still in trilogue until approx. end of 2018

3.5. Wholesale market design

(1) Quo Vadis way forward

The Quo Vadis study, amongst its main recommendations, suggests three main measures: implement a Capacity- Commodity Release Scenario, further refine the Tariff Reform Scenario and consider its implementation, explore a Strategic Partnership with suppliers.

Without prejudice to comments made by Eurogas on previous scenarios and positioning on the outlined reform options, we would like to recognise and express our views on the new reform scenario which is proposed in the final conclusions of the Quo Vadis study and, according to the study, could generate welfare benefit in Europe: the capacity and commodity release option.

- On commodity and capacity release, Eurogas notes that commodity and capacity issues are different and should be treated separately.
- Eurogas does not support an EU wide commodity release programme. European hubs are at different stages of development: Northwest Europe is liquid while some hubs in Southern Europe have been consistently improving over the past few years. Moreover, some markets are well connected to the broader LNG market through LNG terminals. Introducing a commodity release programme in these markets would be unnecessary and counterproductive. However, Eurogas has raised concern with respect to slow progress in Eastern European markets and has consistently encouraged further progress on the implementation of the Third Package and Network Codes. At local level only and for a limited period of time, Eurogas could support ad-hoc measures such as mandatory commodity release programs (on dominant market players) where there are proven structural constraints to competition and liquidity in those specific markets.

With respect to the proposal to increase the share of capacity allocated on a short-term basis:

- Eurogas considers that existing capacity and incremental capacity should be treated differently, as it is envisaged in the current regulatory framework.
- Eurogas notes that throughout Europe, capacity is to some extent still linked to old long-term capacity contracts which do not match the move towards liquid short-term commodity markets and may cause access issues in less developed markets. Eurogas has consistently supported a regulatory framework that enables shippers to build a diversified portfolio of capacity contracts of different durations which suit companies' commercial strategies and evolving market conditions.
- To create a level playing field and ensure long-term contestability, Eurogas would support a higher share of capacity (existing capacity and bookings) being allocated on a short-term basis. Taking into account the impact on the market, this could be achieved, for example, by first allowing shippers to voluntarily release existing long-term bookings. This could avoid reverting to more intrusive interventions.
- The impact of the capacity release on the market varies and depends on whether the capacity released would be booked again. Therefore, a threshold could be considered for possible mitigation to take account of the potential impact on tariffs and network users.

- Eurogas would welcome options increasing the amount of capacity allocated on a short-term basis provided that this does not diminish shippers' ability to deliver on existing long-term commodity contracts, in line with EU security of supply objectives.

Further analysis:

- Eurogas would encourage the Commission to explore options to increase the level of capacity made available to the market on a short-term basis.
- Eurogas would also encourage further investigating the impact of such options by taking into account our views on treatment of stranded infrastructure, including the need to avoid cross subsidies across TSOs, as outlined below
- With respect to spiralling unitary tariffs, to the extent this may become a problem, National Regulatory Authorities (NRAs) should be encouraged to consider appropriate measures, including socialisation and compensation outside of network tariffs, to avoid spiralling tariffs becoming a barrier to cross-border trade, thus negating the success of the single energy market.

(2) Regulatory framework for transmission and storage infrastructure

Storage infrastructure

Eurogas considers that storage has two functions: it is a security of supply instrument and a flexibility tool. The role of storage is different in different markets, depending on the availability of other sources of security of supply and of flexibility. Eurogas therefore believes that any specific storage measure would need to be tailored to the local market, avoiding one-size-fits-all solutions.

With respect to security of supply, Eurogas has consistently expressed a preference for market-based non-distortive mechanisms as opposed to securing utilisation through regulatory obligations on shippers. For example, in case of regulated assets, which are needed for security of supply but have low utilisation rates, Eurogas could support, at local level, removing obligations on market participants, auctioning capacity to maximise commercial utilisation and potentially integrate that with a cost recovery mechanism.

With respect to its flexibility function, Eurogas believes that storage should be managed and participate in the market on a commercial basis and compete against other forms of flexibility.

Transmission infrastructure

Eurogas would encourage the development of options to avoid a vicious circle of spiralling tariffs to deal with possible stranded transmission infrastructure (i.e. low utilisation triggering higher tariffs which further discourage utilisation), as well as with the need to maintain the attractiveness of the EU gas market, competitiveness of gas as a fuel, supply diversification and security of supply.

In particular, Eurogas recommends:

- Policy clarity on the future role of renewable and decarbonised gas to enable a forward-looking regulatory approach to infrastructure
- Coordinated decommissioning or mothballing of stranded infrastructure which is not critical for security of supply

- Explicit compensation outside network tariffs to avoid spiralling tariffs
- A forward-looking and integrated approach to gas and power network planning
- Recognising the value of new infrastructures developed on a merchant basis (i.e. do not restrict exemption processes when these are justified), consistent with the concern to avoid stranded assets
- Avoiding the accelerated depreciation of TSO infrastructure

Eurogas also considers that new and existing flexibility services and other services, such as bunkering, which could be offered on a commercial basis, should be provided by the market and facilitated by transmission infrastructure operators.

(3) Review of governance for implementation, enforcement and assessment of competition beyond formal compliance to rules

In the Madrid Forum, Eurogas has suggested a review of governance to support the removal of national regulatory barriers to market development and instances of non-compliance. The 2020 process offers an opportunity for this and to improve the current process for implementation and enforcement of EU rules. In particular, Eurogas would support:

- A review of the Commission's enforcement powers to ensure that the Commission is able to address instances of consistent lack of progress in implementing EU rules more effectively and quickly
- A review of ACER powers to monitor and assess the level of competition, and actively support the implementation of EU rules (for example: Member States should be obliged to follow structured processes supported by regional roadmaps). ACER has currently very limited ability to go beyond the reporting of formal compliance and to play a role in implementation processes.

3.6. DSO entity: Have an entity for electricity and an entity for gas

The Commission is expected to propose the creation of a DSO entity. There are several possible structures: There could be two completely separate entities for gas and for electricity, or two distinct work streams with separate boards, both housed in the same entity.

Eurogas supports a separate entity for gas DSOs to ensure the adequate representation of gas DSOs and their interests and to ensure that the specificities of the gas sector can be addressed, rather than the same work areas being defined for both electricity and gas. In case this option proves unfeasible, Eurogas would accept, as a compromise, having a single entity with two distinct work streams and clear arrangements that ensure the independence of each work stream.

Nevertheless, Eurogas also considers it very important that both entities work closely together on all cross sectoral topics. This principle should be defined in the legislation.

The responsibilities of the DSO entity need to be further analysed, specifically the possibility of a delegated act, i.e. the fields of activity where the rules become binding.

3.7. The Commission to recognise in the TYNDP process the important role of gas DSOs in managing flexibility

The natural gas grid provides flexibility as well as the option to introduce novel technologies that can facilitate decarbonisation. It would be useful for the Commission to assess the new flexibility services that DSOs provide to the energy system, such as storage for the electricity grid and power-to-gas services, in cases where the market is not able to provide these.
