

EC consultation on the composition of gas risk groups (update)

A Eurelectric response paper

August 2021

Eurelectric represents the interests of the electricity industry in Europe. Our work covers all major issues affecting our sector. Our members represent the electricity industry in over 30 European countries.

We cover the entire industry from electricity generation and markets to distribution networks and customer issues. We also have affiliates active on several other continents and business associates from a wide variety of sectors with a direct interest in the electricity industry.

We stand for

The vision of the European power sector is to enable and sustain:

- A vibrant competitive European economy, reliably powered by clean, carbon-neutral energy
- A smart, energy efficient and truly sustainable society for all citizens of Europe

We are committed to lead a cost-effective energy transition by:

investing in clean power generation and transition-enabling solutions, to reduce emissions and actively pursue efforts to become carbon-neutral well before mid-century, taking into account different starting points and commercial availability of key transition technologies;

transforming the energy system to make it more responsive, resilient and efficient. This includes increased use of renewable energy, digitalisation, demand side response and reinforcement of grids so they can function as platforms and enablers for customers, cities and communities;

accelerating the energy transition in other economic sectors by offering competitive electricity as a transformation tool for transport, heating and industry;

embedding sustainability in all parts of our value chain and take measures to support the transformation of existing assets towards a zero carbon society;

innovating to discover the cutting-edge business models and develop the breakthrough technologies that are indispensable to allow our industry to lead this transition.

Regional cooperation is an essential dimension for safeguarding the security of supply inside the European energy markets. With their continuous integration but also the increased interdependency between gas & electricity sectors, solidarity mechanisms are key to anticipate supply disruption risks and minimise their potential negative collateral effects. With the Regulation (EU) 2017/1938 concerning measures to safeguard the security of gas supply, the solidarity provisions to be implemented by the Member States must handle such risks and contribute to strengthening the resilience of the gas system across Europe.

Eurelectric fully supports regional cooperation in order to address the security of gas supply issues, through the establishment of regional risk groups as well as the implementation of National Preventive Action Plans and Emergency Plans. Eurelectric welcomes the Delegated Regulation proposed by the Commission, as a revision of the 2017 Regulation, to update the composition of the regional risk groups, amended in view of the United Kingdom's departure from the European Union and of new or upcoming gas infrastructures to enter in operation by 2023. For this purpose, the European Commission should set a relevant and comprehensive set of regional groups to make sure that the size is appropriate to deal with the various regional challenges. We notice that the proposed update leads to potentially quite large groups (e.g. Ukrainian and Belarus risk groups), with numerous countries involved, which may be a source of additional burden for those countries in the work process of the risk assessments to be performed.

Moreover, we would like to specifically remind the importance of dialogue and cross-border cooperation among involved stakeholders, within their national scope but also with neighboring countries or countries of the regional risk group. This is especially key for infrastructures recently commissioned for which involved stakeholders should get a broader, regional view or conduct in terms of data exchange and transparency, for both daily operations and hazards management. For this purpose, the regional TSO and NRA collaboration within these groups needs to be strengthened.

Eurelectric pursues in all its activities the application of the following sustainable development values:

Economic Development

- Growth, added-value, efficiency

Environmental Leadership

- Commitment, innovation, pro-activeness

Social Responsibility

- Transparency, ethics, accountability



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