



ANNUAL WORK PROGRAMME

2024

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1 INTRODUCTION

ENTSOG was created in December 2009 as part of the implementation of the European Union's Third Energy Package. This document represents the 2024 edition of the Annual Work Programme (AWP), as required by Regulation (EC) 715/2009. An annex has been included to provide an overview on the legal basis for ENTSOG's primary tasks.

ENTSOG's main tasks have included the monitoring of Network Code implementation, development of its Ten-Year Network Development Plans (TYNDP) (in cooperation with ENTSO-E for scenario development) and assessment of European security of supply, through preparation of Summer Supply Outlook Summer and Winter Supply Outlook reports. ENTSOG has also been tasked with the coordination of network operations under normal and emergency conditions.

Looking at priorities for 2024, ENTSOG and its Members will fulfil the requirements of Regulation (EU) 2022/869 on Guidelines for Trans-European Energy Infrastructure (TEN-E), including the finalisation of the TYNDP 2024 scenario development process, with publication of the final Scenarios Report expected by summer. In parallel, work on TYNDP 2024 Annex A (projects description) will proceed, followed by development of the TYNDP System Assessment Report and Infrastructure Report. The team will work to adapt ENTSO-E/ENTSOG Consistent and Interlinked Model for TYNDP 2024 and future editions.

ENTSOG will further strengthen the cooperation between EU TSOs and the third-country TSOs that play an important role in EU gas supplies, and will contribute to the preparedness for emergencies. The Regional Coordination System for Gas (ReCo System for Gas) will continue its 24/7 exchange platform to address any security of supply challenges in Europe, as it has done so effectively in previous years and the team will assess any developments on the recently established energy security regulatory measures. ENTSOG's Transparency Platform, gas flow and seasonal supply dashboards will continue to provide up-to-date and relevant data to inform gas market stakeholders.

ENTSOG will focus on strategic topics, specifically those required to facilitate gas grids' constructive role in the energy transition, e.g., the repurposing, retrofitting and refurbishment of the gas grids for the transport of renewable and low carbon gases. Core themes for 2024 include unbundling, tariffs, financing, guarantees of origin/certificates, gas quality and hydrogen, biomethane and $\rm CO_2$ transport and handling, and security of supply, including cybersecurity and regional cooperation. The teams

will also monitor the development of the Carbon Management Strategy and engage with stakeholders on the revision of the Electricity Market design and the REMIT Regulation. ENTSOG and its TSO members will continue their efforts to improve data quality and completeness published on the Transparency Platform and delivering on their REMIT obligations.

As for previous years, and to continuously improve its way of working and develop its relations with key stakeholders, ENTSOG will progress regular engagement with European Commission (EC), ACER, stakeholders and ENTSOG's members to ensure a constructive and effective mutual dialogue. In addition to usual workshops and prime movers groups, the ENTSOG team will activity facilitate value-chain discussions through the Advisory Panel for Future Gas Grids and the European Clean Hydrogen Alliance Roundtable on Clean Hydrogen Transmission and Distribution, among others.

Most significantly, the ENTSOG team will undertake the necessary activities that will be required within the regulatory framework of the Hydrogen and Decarbonised Gas Markets package (Regulation and Directive). This legislation, expected to come into force in 2024, aims to decarbonise gas markets, promote hydrogen and biomethane and reduce methane emissions. ENTSOG will also work to support the Members with the implementation of this new legislation, as well as the Emissions Regulation, and Renewable Energy Directive (RED III).

And finally, ENTSOG will continue its work as a proactive, trusted adviser on gas transmission related topics on a European level in 2024 and beyond, to support the achievement of the EU goals of competitiveness, security of supply and sustainability. ENTSOG recognises the urgency to diversify gas supply, to enable a robust and uninterrupted energy delivery, but also the necessity of grids' readiness for renewable and low carbon gases. The structure of ENTSOG with the embedded expertise of its members, as well as of its Brussels office, will continue to play a pivotal role in the further development of the European gas markets and the future of gas grids.



1.1 SUMMARY OF ENTSOG's ACTIVITIES IN 2024

ENTSOG's main activities can be described using the following four headings:

- ▲ Networks Codes and Guidelines (Section 2)
- ▲ Scenarios and Infrastructure (Section 3)
- ▲ Security of Supply (Section 4)
- **▲** Energy Transition (Section 5)

The Annual Work Programme (AWP) had previously focused primarily on the regulatory tasks assigned by the Third Energy Package, including the development process of the network codes, a cornerstone of the organisation's activities. ENTSOG's efforts continue on monitoring the implementation and effects of the Congestion Management Procedure (CMP) Guidelines, Capacity Allocation Mechanisms Network Code (CAM NC), Tariff Network Code (TAR NC), Balancing Network Code (BAL NC) and implementation of the Interoperability and Data Exchange Network Code (INT NC) - these are addressed in Section 2 of this document. The joint activity of managing the Functionality Process with ACER and Transparency Guidelines (including on the Regulation on Wholesale Energy Market Integrity and Transparency, or 'REMIT') is also included in Section 2.

Other regulatory tasks include the elaboration of the Ten-Year Network Development Plan (TYNDP), providing regular information on gas supply and demand for the European market and delivering common operational tools to ensure network security and reliability. These are described in Sections 3 and 4. Section 5 outlines ENTSOG's decarbonisation efforts to address the climate targets and describe how the gas grid can facilitate the transport of renewable gases and low carbon gases, including biomethane and hydrogen.

Research and Development activities undertaken by ENTSOG are described in Section 6. Details on ENTSOG's internal supporting organisation are provided in Sections 7 of this document.

Each topic in Sections 2 – 6 includes objectives, key deliverables and activities and a programme of activities for 2023. ENTSOG's key work areas and deliverables are highlighted in Sections 1.1.1 to 1.1.5 below and summarised in the 'Programme of Activities' tables in each section.

A summary of regulatory references is included in the Annex – Section 8.



1.1.1 NETWORK CODES AND GUIDELINES

In 2024, ENTSOG will continue to provide help and support to its Members and other market participants on Network Code and Guideline-related topics and will maintain monitoring activities. ENTSOG will work with ACER in providing joint solutions to issues posted by stakeholders on the Gas Network Codes Functionality Platform.

Interoperability work in 2024 includes the development, support, and maintenance of Common Network Operation Tools (CNOTs) for data exchange. ENTSOG will continue to work in close cooperation with ACER, European Commission (EC), Energy Community, EASEE-gas and other stakeholders on all matters relating to Network Code and Guidelines.

Activities undertaken for the Transparency Guidelines and REMIT topics relate mainly to the management of the transparency and reporting obligations including TSOs' publications on their websites, on the ENTSOG Transparency Platform (TP) and data reporting to ACER REMIT Information System (ARIS). From a TP perspective, work will be undertaken to analyse stakeholder feedback and implement new functionalities on the Platform that will improve the usability and user-friendliness of the published data. ENTSOG and its TSO members will continue their efforts to improve data quality and completeness and delivering on their REMIT obligations. Additional support will be provided to the TSOs from Energy Community Contracting Parties as they advance their efforts on transparency publications, including potential publication on ENTSOG's TP.

1.1.2 SCENARIOS AND INFRASTRUCTURE

The revision of Regulation (EU) 2022/869 on guidelines for trans-European energy infrastructure (TEN-E) includes a more formal role for ACER and the EC in the TYNDP 2024 scenario development process, impacting the timing of the final publication of the Scenarios report. This consultation process will depend on the timing of ACER to provide its Opinion and EC to provide its approval, and input from other stakeholders. The publication of the final TYNDP 2024 report after approval by EC is expected by Summer 2024. Meanwhile, the TYNDP 2026 scenario cycle will be launched in 2024.

In 2024, ENTSOG will also continue to work on TYNDP 2024, starting with the preparation of the TYNDP 2024 Annex A, publication expected in the first half of 2024. Following this, ENTSOG will proceed to work on the TYNDP 2024 System Assessment Report and Infrastructure Report. The team will work to adapt ENTSO-E/ENTSOG Consistent and Interlinked Model for TYNDP 2024 and future editions

In the second half of 2024, ENTSOG will start to prepare the project portal for the data collection of PCI candidates. In addition, ENTSOG will support EC in the second PCI call under revised the TEN-E through the Cooperation Platform. In addition, ENTSOG plans to publish the Transmission Capacity Map 2024 and – jointly with ENTSO-E – the System Development map 2023.



1.1.3 **SECURITY OF SUPPLY**

ENTSOG continues its assessment of the European security of supply, through preparation of deliverables: Summer Supply Outlook 2024 with winter 2024/25 overview and Summer 2023 Review and the Winter Supply Outlook 2024-2025 with summer 2025 overview and Winter 2023-2024 Review.

ENTSOG will undertake work on facilitating the existing Regional Coordination System for Gas (ReCo System for Gas) as a CNOT for emergency conditions and the common incidents classification scale. ReCo will continue its 24/7 exchange platform and coordinating work to help address security of supply challenges in Europe. ENTSOG will continue to support the EC and the Gas Coordination Group (GCG) in implementing the current Security of Supply Regulation¹, developing adjustments and new documentation, in particular by assisting, if requested, in preparing and implementing solidarity principles, regional emergency plans, preventative action plans, the market correction mechanism and storage filling level targets. Further work is also expected in assisting the Energy Community

Secretariat and Contracting Parties in security of supply activities, e.g., SEEGAS steering committee and others.

ENTSOG will monitor the use of the CNOTs for emergency conditions, as adopted by ACER in 2019 - along with the evolution of operational processes and needs – and will revise them if needed.

Considering that most EU Member States import natural gas from non-EU countries and that a very large share of those imports originates from, or crosses third countries to the EU, ENTSOG will further strengthen the cooperation between EU TSOs and third-country TSOs that play an important role in EU gas supplies and contribute to the preparedness for emergencies.

Finally, ENTSOG will also undertake essential ad hoc analysis to support the EC and other stakeholders in the context of the changes after the Russian war against Ukraine and the current geopolitical situation.

¹ As amended by Regulation (EU) 2022/1032 of the European Parliament and the Council of 29 June 2022 amending Regulations (EU) 2017/1938 and (EC) No 715/2009 with regard to gas storage.

1.1.4 ENERGY TRANSITION

ENTSOG will in 2024 continue to participate in and contribute to the realisation of European Green Deal, including legislative initiatives within the 'Fit for 55' package and the Hydrogen and Decarbonised Gas Market package. ENTSOG will in particular focus on supporting the gas TSO Members in implementation of key legislative files finalised in 2023, monitor the development of the Carbon Management Strategy and engage with stakeholders on the revision of the Electricity Market design and REMIT Regulation. ENTSOG's energy transition activities will continue to focus on two core topics:

- Energy System Integration, to aim for an integrated energy market with gas, electricity and hydrogen, biomethane; and
- 2. Decarbonisation of the gas grids, with focus on uptake of renewable and low-carbon gases as well as development and planning of the EU hydrogen backbone via repurposing and retrofitting of existing pipelines, based on the revised TEN-E Regulation.

With respect to the regulatory framework, ENTSOG will focus on supporting the Members with the implementation of the Hydrogen and Decarbonised Gas Package, Emissions Regulation, and Renewable Energy Directive (RED III). Core topics include:

unbundling, tariffs, financing, guarantees of origin/certificates, gas quality and hydrogen transport and handling, and security of supply, including cybersecurity and regional cooperation.

On these topics, ENTSOG will consider any applicable initiatives and proposals published by the EC, ACER or other relevant stakeholders, as and will liaise internally with different working groups and task forces. ENTSOG will continue working on the principles developed under its 2050 Roadmap for Gas Grids and its Action Plan, specifically and actively communicating through the channels established therein.

ENTSOG will continue to engage with stakeholders along the whole value-chain via:

- ▲ Advisory Panel for Future Gas Grids
- Prime Mover Group on Gas Quality and Hydrogen Handling²
- ✓ Prime Mover Group on Guarantees of Origin
- European Clean Hydrogen Alliance Roundtable on Clean Hydrogen Transmission and Distribution
- European Clean Hydrogen Partnership
- ✓ Investor's Dialogue on Energy

1.1.5 MANAGEMENT SUPPORT

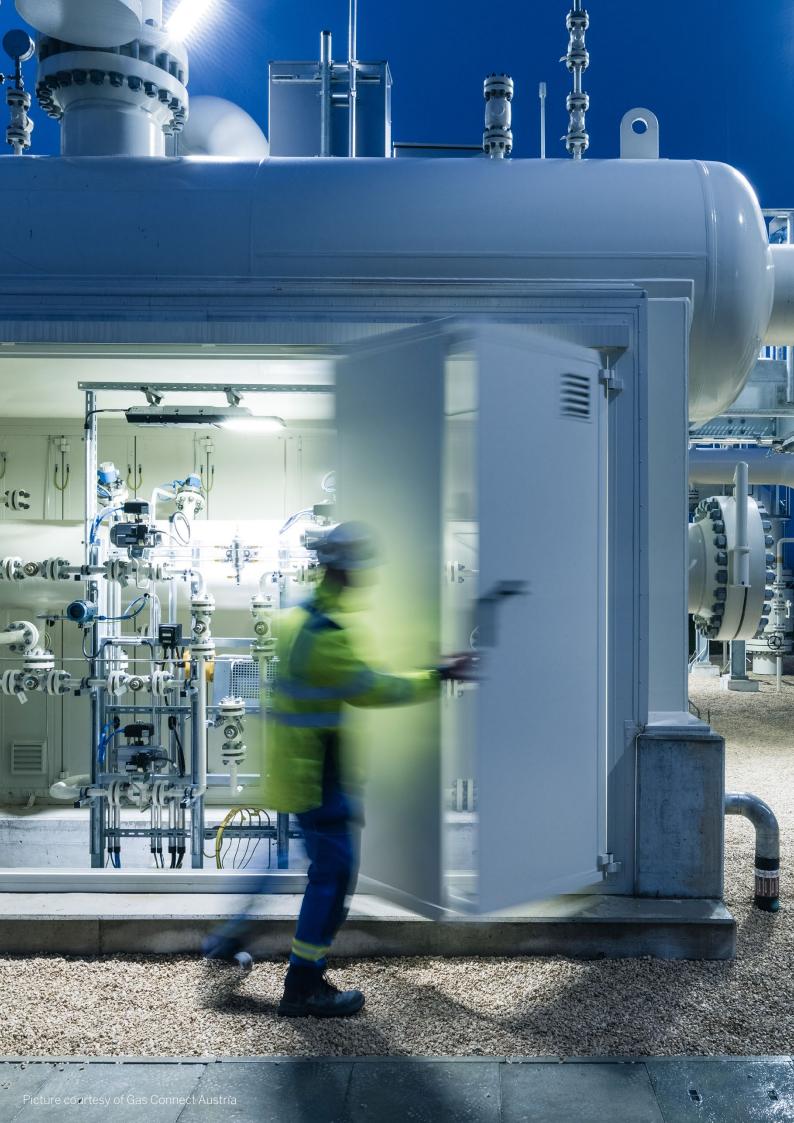
In 2024, the ENTSOG Management Support team will continue to work with the Business Areas and management in Brussels, and with ENTSOG members. Support will be through the Admin, Legal and Corporate Affairs, HR, Finance, and IT functions, to ensure there is a robust platform for ENTSOG activities and deliverables.

The Management Support team is responsible for the meetings of the General Assembly and the Management Board as well as coordinating ENTSOG publications, e.g., Annual Report and Annual Work Programme (AWP). In addition, the activities of the Liaison Group, the Legal Advisory Group and the Financial Committee are organised by the Management Support team along with the activities of

the External Contact Platform (open to non-EU Gas transmission companies), which was created in collaboration with the Energy Community. Additionally, the Management Support team will facilitate the framework for cooperation between ENTSOG and the UK TSOs in 2024.

The Annual Report and AWP are the result of combined efforts from the entire ENTSOG team – the Annual Report assesses ENTSOG's work and achievements retrospectively for each given year. The ENTSOG AWP contains the expected activities for ENTSOG in the upcoming year, considering ACER's opinions on ENTSOG's work and allowing the interested stakeholders to prepare their activities vis-à-vis ENTSOG.

² Depending on topic-related developments, the engagement could take place either via the continuation of the dedicated Prime Movers' Group on gas quality and hydrogen handling or stakeholder workshops. Please, note that the Prime Movers' Group is currently in stand-by mode.



2 NETWORK CODES AND GUIDELINES

Regulation (EC) No. 715/2009 requires European-wide Network Codes and Guidelines to be developed by ENTSOG to harmonise the applicable rules aimed at facilitating market integration.

All the so-far foreseen Network Codes and the Guidelines have been developed. ENTSOG is required to monitor the implementation of the Network Codes and the Guidelines and their effect on the harmonisation of applicable rules aimed at facilitating market integration and transparent rules, which will continue in 2024 and beyond. ENTSOG will also continue to actively participate in the further development of the Network Codes and Guidelines through the Functionality Process as well as any formal regulatory amendment process which might be initiated in the future, as required. Additionally, ENTSOG will consider any specific legislative developments arising from the European Commission's 'Fit for 55' legislative package. In particular, potential changes or new Network Codes arising from the Hydrogen and Decarbonised Gas Package, which was proposed by the EC in 2021, will need to be considered, as well as the EC's Net Zero Industry Act proposed in 2023.

More specifically in relation to transparency, specific obligations for gas TSOs have been introduced through Regulation (EC) No. 715/2009, defining the basic transparency rules further specified in Chapter 3 of Annex I (and its amendments). Reporting obligations have been added following the REMIT Regulation including its Implementing Acts. ENTSOG will also continue to deliver on these requirements and implement necessary updates.

With the consequences of Russia's ongoing war in Ukraine on the European gas market since 2022, ENTSOG considers that the full implementation of Network Codes and Guidelines in each Member State is of paramount importance, not only from a market perspective, but also from a system operations and security of supply point of view. For this reason, ENTSOG will continue to pay additional attention to compliance with European legislation in this context.

2.1 CAPACITY ALLOCATION MECHANISMS NETWORK CODE

The CAM NC sets up capacity allocation mechanisms for existing and incremental capacity and how adjacent TSOs cooperate to facilitate capacity sales, having regard to general commercial as well as technical rules related to capacity allocation mechanisms.

The amended CAM NC entered into force as Regulation (EU) 2017/459 on 6 April 2017 and repealed the previous Regulation (EU) No. 984/2013. It

is anticipated that changed market conditions, ongoing Functionality processes, and recent court rulings could give reason to further amend the CAM NC. In 2024, ENTSOG will continue to support the implementation of the CAM NC by providing members and stakeholders with advice and guidance throughout the implementation process, as well as engage in any activities related to possible amendments to the CAM NC if such a process were to be launched by the European Commission.

2.1.1 OBJECTIVES

- ✓ To support the implementation and application of the CAM NC.
- ✓ To monitor and analyse the implementation of the CAM NC and its effect on the harmonisation of applicable rules aimed at easing market integration.
- ✓ To monitor the incremental capacity process initiated in 2021 according to Chapter V of the CAM NC and provide support to members throughout the different steps of this process.
- To facilitate activities and provide expert knowledge and guidance to stakeholders related to capacity.

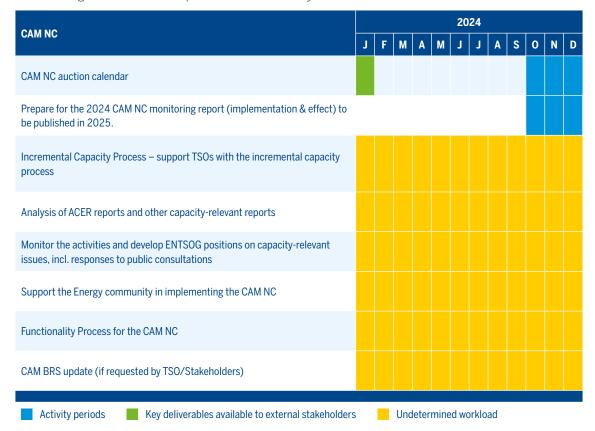
- ✓ To respond to CAM NC-related issues raised on the Functionality Platform, working in close dialogue with stakeholders.
- ✓ To support and assist in the implementation of the CAM NC in terms of regulatory interpretation by relevant EU bodies as well as via knowledge sharing and the dissemination of good practices, including assistance to the Energy Community in implementing the CAM NC.
- To develop documents/solutions stemming from legal obligations on ENTSOG outlined in the CAM NC (including the auction calendar published every year).

2.1.2 KEY ACTIVITIES AND DELIVERABLES

- ▲ Commence work on the 2023–2024 CAM NC Implementation and Effect Monitoring Report to be published in 2025.
- ✓ Publish the yearly CAM NC Auction Calendar.
- ✓ Issue solutions delivery from the joint ACER and ENTSOG functionality process involving stakeholders.
- ✓ Update the Business Requirements Specification (BRS) CAM if requested by TSO/Stakeholders.
- ▲ Monitor the progress of the incremental capacity process and support members throughout the different steps of this process.
- ✓ Develop ENTSOG positions on capacity-related issues, including responses to public consultations and ACER reports.

2.1.3 PROGRAMME OF ACTIVITIES

The following table shows the expected timeline and key activities on CAM NC related issues:





2.2 **BALANCING NETWORK CODE**

The BAL NC applies to balancing zones within the borders of the EU. It establishes rules for natural gas balancing, including network-related rules on nomination procedures, imbalance charges, settlement processes associated with daily imbalance charges, and provisions on operational balancing.

The BAL NC was published in the Official Journal of the European Union on 26 March 2014. The code entered into force on 16 April 2014 with a first implementation deadline of 1 October 2015. However, according to Article 52(1), the application could be postponed until 1 October 2016, if approved by the

NRA and provided that no interim measures were applied. As a third option, the BALNC allowed TSOs to apply interim measures according to Articles 45-50 in the absence of sufficient liquidity on the short-term wholesale market and upon approval by the NRA. Article 45(4) set April 2019 as the deadline for the termination of interim measures.

In 2024, ENTSOG will continue to support the implementation of the BAL NC by providing members and stakeholders advice and guidance throughout the implementation process and any other related topics.

2.2.1 **OBJECTIVES**

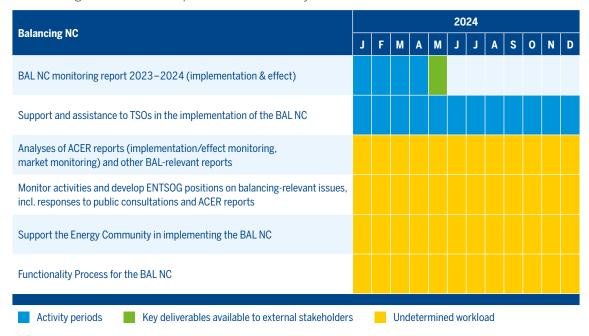
- ✓ To support the implementation and application of the BAL NC.
- ▲ To monitor and analyse the implementation of the BAL NC and its effect on the harmonisation of applicable rules aimed at easing market
- To facilitate activities and provide expert knowledge and guidance to stakeholders related to balancing.
- To respond to BAL NC-related issues raised on the Functionality Platform, working in close dialogue with stakeholders.
- To support and assist in the implementation of the BAL NC in terms of regulatory interpretation by relevant EU bodies as well as via knowledge sharing and the dissemination of good practices, including assistance to the Energy Community in implementing the BAL NC.
- To coordinate with ACER on data exchange and information sharing to monitor the effective implementation of the BAL NC.

2.2.2 **KEY ACTIVITIES AND DELIVERABLES**

- ✓ Publish the 2023–2024 BAL NC Implementation and Effect Monitoring Report.
- ✓ Issue solutions delivery from the joint ACER and ENTSOG functionality process involving stakeholders.
- Update the Business Requirements Specification (BRS) for Balancing processes if requested by TSO/stakeholders.
- ▲ Develop ENTSOG positions on balancingrelated issues, including responses to public consultations and ACER reports.

2.2.3 PROGRAMME OF ACTIVITIES

The following table shows the expected timeline and key activities on BAL NC related issues:



2.3 TARIFF NETWORK CODE

The TAR NC on rules regarding harmonised transmission tariff structures for gas was published in the Official Journal of the European Union on 17 March 2017 and entered into force on the 6 April 2017. The application of the TAR NC was over three dates: 6 April 2017 (chapters I, V, VII, IX, X); 1 October 2017 (chapters VI, VIII); 31 May 2019 (chapters II, III, IV).

The TAR NC contributes to achieving tariffs, or methodologies used to calculate them (which are transparent), consider the need for system integrity and its improvement, reflect the actual cost incurred, are non-discriminatory, facilitate efficient gas trade and competition, avoid cross-subsidies between network users, and provide incentives for investment.

ENTSOG will continue in 2024 to support the ongoing implementation and monitoring of the TAR NC by providing members and stakeholders with advice and guidance throughout the implementation process.

2.3.1 OBJECTIVES

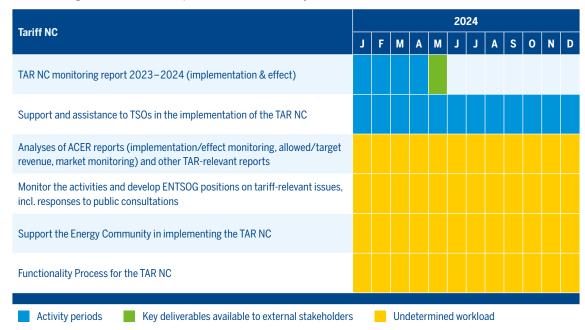
- To support the implementation and application of the TAR NC.
- ✓ To monitor and analyse the implementation of the TAR NC and its effect on the harmonisation of applicable rules aimed at easing market integration.
- To facilitate activities and provide expert knowledge and guidance to stakeholders related to tariffs
- ✓ To respond to TAR NC-related issues raised on the Functionality Platform, working in close dialogue with stakeholders.
- To support and assist in the implementation of the TAR NC in terms of regulatory interpretation by relevant EU bodies as well as via knowledge sharing and the dissemination of good practices, including assistance to the Energy Community in implementing the TAR NC.
- To develop documents/solutions stemming from legal obligations for ENTSOG outlined in the TAR NC (for example, regarding transparency requirements).

2.3.2 **KEY ACTIVITIES AND DELIVERABLES**

- ✓ Publish the 2023-2024 TAR NC Implementation and Effect Monitoring Report.
- ✓ Issue solutions delivery from the joint ACER and ENTSOG functionality process involving stakeholders.
- Develop ENTSOG positions on tariff-related issues, including responses to public consultations and ACER reports.

2.3.3 **PROGRAMME OF ACTIVITIES**

The following table shows the expected timeline and key activities on Tariff NC related issues:



INTEROPERABILITY AND DATA EXCHANGE NETWORK CODE 2.4

Regulation (EU) 2015/703 established a network code on interoperability and data exchange rules (INT NC) in 2015.

An appropriate degree of harmonisation in technical, operational and communication areas is key to overcome potential barriers to the free flow of gas in the European Union. The INT NC enables the necessary harmonisation in those areas, therefore leading to effective market integration. For that purpose and for facilitating cooperation between adjacent transmission system operators, ENTSOG provides assistance for the harmonised implementation of the INT NC and develops and maintains CNOTs for the technical implementation of Network Codes and Guidelines.

OBJECTIVES 2.4.1

- ▲ To support the implementation and application. of technical, operational and communication harmonised rules.
- ▲ To investigate the further steps of harmonisation regarding common data exchange solutions.
- To facilitate and support coordination of technical cooperation between Member States, Energy Community and third-country transmission system operators, as required by Art 8(3)c of Regulation (EC) No. 715/2009.

2.4.2 KEY ACTIVITIES AND DELIVERABLES

2.4.2.1 Monitoring of the implementation and functioning of the Network Code on Interoperability and Data Exchange Rule

- ✓ Publish the 5th Implementation Monitoring Report (IMR-2023) of the Network Code on Interoperability and Data Exchange Rules.
- ✓ Review of selected Interconnection Points by ACER, to document detailed evidence of Interconnection Agreements' (IAs') compliance with the INT NC as a complementary part of the IMR. The results of the IMR will be considered as input for a dialogue on a possible amendment of the INT NC.
- ▲ Analyse any proposals arising from the Functionality Process including validation, categorisation and prioritisation of the issues and develop proposals for improvement or amendment of the network codes or guidelines together with other ENTSOG business areas as well as with ACER and relevant stakeholders.
- Facilitate possible amendments of the INT NC to implement the agreed solutions for reported FUNC issues (e.g., reported FUNC issues "Communication Protocol and encryption" and "Capacity trading platforms").

2.4.2.2 Development, support and maintenance of common network operation tools (CNOTs) for data exchange

- Monitor the implementation and functionality of published CNOTs for capacity and congestion, and nominations and matching procedures, including the related Business Requirement Specifications, edig@s xml, implementation guidelines and the technical communication profiles.
- ✓ Provide support throughout 2024 for the CNOTs, including delivering an amended version of a given CNOT as and when required.
- Hold a Data exchange and cyber security workshop related to the implementation of Common Data Exchange Solutions featuring Data Exchange, Communication and Cyber Security.
- Maintain the new gases pre-analysis report created in 2022 and build out the report to included hydrogen processes. Further refine the following document as required: INT2265-22 220121 Report on Gas pre-analysis.
- ▲ Analyse any suitable requests concerning potential Data Exchange harmonisation.
- Maintain cooperation with EASEE-gas, GIE, EC (DEP- Digital Europe Program) eDelivery, ACER and other relevant stakeholders in the field of data exchange and share appropriate and relevant information.

2.4.2.3 Technical cooperation between Member States, Energy Community and third-country transmission system operators

- ✓ If required, update recommendations relating to the coordination of technical cooperation between Member States, Energy Community and third-country transmission system operators.
- Support the TSOs of Member States, Energy Community and third countries in the implementation of the INT NC rules and expanding regional cooperation.
- ✓ Host possible workshop to discuss future steps for strengthening technical cooperation between Member States, Energy Community and third-country TSOs supplying or transiting gas to the EU (e.g., North African countries, Turkey). This cooperation is also discussed on the external communication platform which was established between ENTSOG and Energy Community Secretariat.

2.4.2.4 Operate the Local Issuing Office for Energy Identification Coding scheme

- Management of EIC Codes requests and updates from/to the Central Issuing Office (CIO/ENTSO-E) and ENTSOG website.
- Cooperation with ENTSO-E to further streamline and standardise the implementation of the scheme in the gas sector.

2.4.2.5 Gas Quality and Hydrogen handling:

- ▲ Cooperate with CEN Technical Committees (TC) 234 and 408, particularly in:
 - The revision of the standard EN16726 including the associated Task Forces dealing with the review of the following gas quality parameters: hydrogen and relative density, Wobbe Index (WI), Sulphur, Methane number and oxygen.
 - The development of a CEN standard on hydrogen quality technical specifications, depending on the EC mandate to CEN.
 - The work carried out by the Working Groups established in CEN TC 408, to prepare the next revision of EN 16723 - natural gas and biomethane for use in transport, and biomethane for injection in the natural gas grid.
- ✓ Carry on activities related to the gas transmission network readiness to integrate hydrogen and other renewable and low-carbon gases.
- ▲ Explore the possibilities of deploying a 'smart gas grid' to improve the interoperability of systems and technologies and provide a better gas quality and hydrogen management.

- ▲ Advise on Strategic Research and Innovation Agenda and the Annual Work Plan of the Clean Hydrogen Partnership as part of its Stakeholder Group.
- ▲ Assess the potential achievable hydrogen purity levels on repurposed natural gas grids.
- Further assess the technical challenges for TSOs on Gas Quality management (i.e, oxygen removal, WI classification system management, information provision), together with challenges and impact related to the injection of higher amounts of biomethane into the gas grids.
- Cooperate with stakeholders to define gas quality and hydrogen handling principles (via Prime Movers' set up³ and/or engagement with other associations WGs e.g., EASEE-gas, CEN, Marcogaz, GERG, GIE, CEDEC, GEODE, GD4S, Eurogas, etc).

2.4.2.6 Methane Emissions Reduction

- Follow the development on the methane emissions reduction process in Europe and will collaborate with other organisations like GIE, MARCOGAZ, GERG, and Eurogas
- ✓ If required, provide support to TSOs in the methane emissions reduction activities. This support includes, in particular, activities recommended by EC/UNEP for methane emissions reporting and targets setting, as well as dissemination of best practices for the detection, quantification and mitigation of methane emissions.
- During the development and implementation of the EU Regulation on Methane emissions reduction in the energy sector, ENTSOG will follow the process and will be involved in preparation of feedback and other activities to the extent needed.
- Follow the new R&D initiatives and monitor the technical discussions regarding hydrogen emissions.

³ Depending on topic-related developments, the engagement could take place either via the continuation of the dedicated Prime Movers' Group on gas quality and hydrogen handling or stakeholder workshops. Please, note that the Prime Movers' Group is currently in stand-by mode.

2.4.3 PROGRAMME OF ACTIVITIES

The following table shows the expected timeline and key activities on INT NC related issues:

		2024											
nteroperability and Data Exchange NC	J	F	М	A	М	J	J	A	s	0	N	ı	
Publish the fifth INT NC monitoring report covering a period 2022–2023													
Start preparatory work for the revision of the INT NC considering the adoption of the revised Gas Regulation													
Support and assistance of TSOs and Energy Community and stakeholders in the implementation of the INT NC and relevant CNOTs													
Monitor the implementation and functionality of published CNOTS. Update of CNOTs when required.													
Functionality Process for the INT NC													
TC KG Data Exchange and Cybersecurity workshop													
Deliver an analysis of potential solutions in data exchange harmonisation as and when required.													
CAM/CMP BRS update (and Nomination & Matching BRS update) if requested by TSO/Stakeholders													
Management of EIC codes													
ENTSOG – GIE cooperation on EC's Methane Emissions initiative													
Cooperation with other stakeholders on Cyber Security													
Continue with stakeholders on the ongoing work to create, at the European and national level, an updated ENTSOG AS4 profile with new encryption features.													
Maintain the new gases CNOT analysis report for Hydrogen processes. NT2265-22 220121													
Maintain cooperation with EASEE-gas, GIE, EC (DEP- Digital Europe Program) Delivery, ACER and other relevant stakeholders in the field of data exchange.													
Analysis of interoperability topics in relation to the new gas package													
Cooperation with stakeholders on Gas Quality and hydrogen handling (e.g., via prime movers' group, stakeholder workshops)													
Cooperation with CEN in standardisation activities for gas and hydrogen quality													
Organise a public Workshop on Gas Quality & hydrogen handling													
Advise on Strategic Research & Innovation Agenda and Annual Work Plan of the Clean Hydrogen Joint Undertaking													
Continue assessment of the maximum achievable hydrogen purity level on repurposed natural gas grids													
Explore the possibilities of deploying 'smart gas grids'													
Assess the technical challenges of Gas Quality management and impact of the njection of higher amounts of biomethane into the gas grids													

2.5 **CONGESTION MANAGEMENT PROCEDURES GUIDELINES**

The CMP GLs were developed by the EC in 2010 and 2011 and approved by the EU Gas Committee on 24 August 2012. The implementation date was 1 October 2013.

The CMP GLs help free up unused capacity with a view to optimal and maximum use of the technical capacity and the timely detection of future congestion and saturation points. They facilitate cross-border exchanges in natural gas on a nondiscriminatory basis.

ENTSOG will continue to support the implementation of the CMP GLs in 2024, by providing members and stakeholders with advice and guidance throughout the implementation process, in particular focusing on potential changes to the CMP GLs arising from the Hydrogen and Decarbonised Gas Package proposed by the EC in 2021.

2.5.1 **OBJECTIVES**

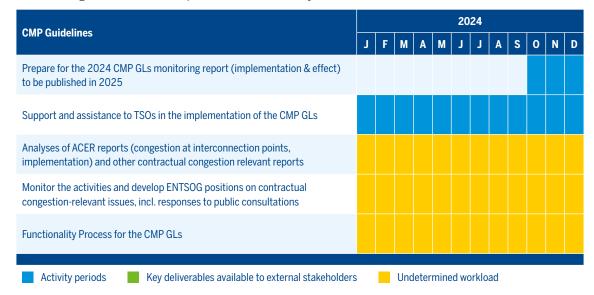
- ▲ To support the implementation and application. of the Congestion Management Procedures Guidelines.
- ✓ To monitor and analyse the implementation of the CMP GLs and its effect on the harmonisation of applicable rules aimed at easing market integration.
- ▲ To facilitate activities and provide expert knowledge and guidance to stakeholders related to congestion management.
- To respond to CMP GLs-related issues raised on the Functionality Platform, working in close dialogue with stakeholders.
- To support and assist in the implementation of the CMP GLs in terms of regulatory interpretation by relevant EU bodies as well as via knowledge sharing and the dissemination of good practices, including assistance to the Energy Community in implementing the CMP GLs.

2.5.2 **KEY ACTIVITIES AND DELIVERABLES**

- ✓ Commence the work on the 2023–2024 CMP GLs Implementation and Effect Monitoring Report to be published in 2025.
- ✓ Issue solutions delivery from the joint ACER and ENTSOG Functionality Process involving stakeholders.
- ✓ Update the Business Requirements Specification (BRS) CMP if requested by TSO/Stake-
- ✓ Develop ENTSOG positions on congestion management-related issues, including responses to public consultations and ACER reports.

2.5.3 **PROGRAMME OF ACTIVITIES**

The following table shows the expected timeline and key activities on CMP related issues:



2.6 TRANSPARENCY GUIDELINES

The energy market liberalisation process, aimed at securing a well-functioning, open and efficient internal market in gas, has significantly changed the gas transmission business and increased the need for transparency. In this respect, specific obligations for gas TSOs have been introduced through Regulation (EC) No 715/2009, which defines the basic transparency rules, further specified in Chapter 3 of Annex I (and its amendments).

The Network Codes have been developed to provide rules and procedures to reach an appropriate level of harmonisation towards efficient gas trading and transport across gas transmission systems in the EU, increasing data publication requirements.

ENTSOG activities on the Transparency topic relate to management of the transparency obligations including TSOs' publications on their websites and the Transparency Platform and Regulation on Energy Market Integrity and Transparency (REMIT). Regulation (EU) No. 1227/2011 (REMIT) and its Commission Implementing Regulation (EU) No. 1348/2014 introduced additional publication and reporting obligations to the market participants, aimed at supporting market monitoring, fostering open and fair competition in wholesale energy markets. The REMIT obligations are also handled by the Transparency Area in ENTSOG.

2.6.1 OBJECTIVES

The objective of the Transparency activities in ENTSOG is to enhance the transparency of gas TSOs' activities in the European Union. This is realised by the data published on the Transparency Platform (TP) and the TSOs' websites. The requirements for the transparency publications are specified in Regulation (EC) No 715/2009, REMIT and the Network Codes. The main objectives are to:

- ✓ Further enhance ENTSOG Transparency Platform with functionalities improving the usability and user-friendliness of the published data while taking cost-efficiency into account.
- ▲ Monitor, analyse and apply the legal transparency and reporting requirements coming from EU legislation such as:

- Regulation (EC) No 715/2009
- Regulation (EU) No 1227/2011
- Regulation (EU) No 1348/2014
- Regulation (EU) 2015/703
- Regulation (EU) 2017/459
- Regulation (EU) 2017/460
- Regulation (EU) 2019/942
- Cooperate with other ENTSOG business areas to fulfil transparency requirements coming from relevant network codes and liaise with relevant ENTSOG WG to identify synergies in fulfilling these obligations.



2.6.2 KEY ACTIVITIES AND DELIVERABLES

In line with the previous Annual Work Programme 2023, ENTSOG continues to update and improve the ENTSOG Transparency Platform to the benefit of all users and stakeholders. The TP provides technical and commercial data on the TSOs' transmission-relevant points, showing them on an interactive map, in charts, in tables, in downloads, and as 'Application Programming Interfaces' (APIs). Part of this information is also available via 'Really Simple Syndication' (RSS) web-feeds. The information is available free of charge, provided by the TSOs.

ENTSOG continues to work closely with the TSOs to apply the regulation provisions, including the transparency requirements coming from the Network Codes and Guidelines, and REMIT.

The following is a list of key activities and deliverables:

- Strive to continuously improve the TP user experience based on feedback from public workshops, the Functionality Platform, satisfaction surveys, and the TP "Submit a question" form
- Organise a workshop to receive feedback from stakeholders.
- Evaluate the communication between ENTSOG and the TP users in terms of newsletters, sur-

- veys, and announcements on the Platform.
- Support TSOs in improving data completeness and consistency in line with legal obligations.
- ▲ As Registered Reporting Mechanism, continue to provide aggregated fundamental data to the ARIS as defined in Article 9(1) of Regulation (EU) 1348/2014.
- ✓ Follow-up on reporting and on data collection processes for TSOs and ENTSOG under REMIT obligations. In 2024, this will include activities to implement changed security requirements.
- Maintain, together with the gas TSOs, a close working relationship with ACER's Market Integrity and Transparency department and support bilateral effort in improving REMIT application. This includes participation in ACER public consultations and surveys on REMIT as well as various stakeholder user groups managed by ACER, e.g., REMIT Expert Group, RRM User Group, and roundtables for REMIT reporting and inside information disclosure.
- Prepare implementation following the updated publication provisions of the Hydrogen and Decarbonised Gas Markets Package.

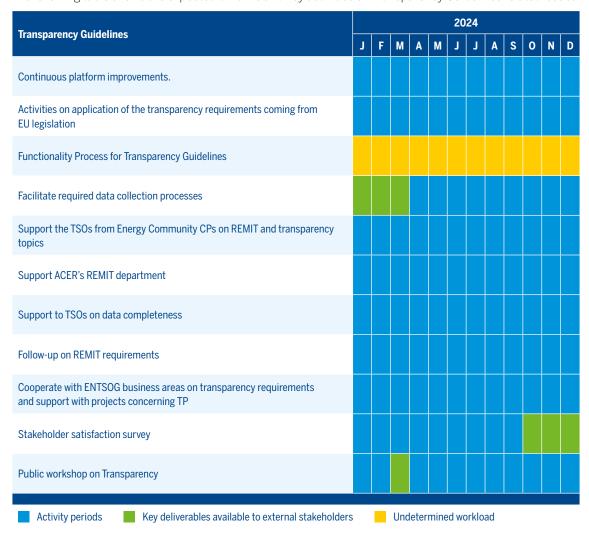
2.6.3 SUPPORTING ACTIVITIES

ENTSOG will facilitate required data collection processes when required by the legislation, e.g., the information for ACER's 2024 Congestion Monitoring Report. The team will support TSOs from the Energy Community Contracting Parties on their ENTSOG TP transparency publications and provide support to ACER's REMIT teams and ACER stakeholder user groups, e.g., REMIT Expert Group, RRM User Group, roundtables for REMIT reporting and for inside information disclosure etc., with input on the processes and practices on the EU gas market relevant for the REMIT implementation and developments.

ENTSOG will facilitate continuous dialogue with other ENTSOG working and kernel groups to provide support for any ad hoc data requests for possible ACER monitoring or for research studies within ENTSOG. Furthermore, ENTSOG will support the other ENTSOG working and kernel groups on projects related to the usage of information provided by the TSOs in ENTSOG's Professional Data Warehouse (PDWS) including the Regional Coordination System for Gas (ReCo System for Gas).

2.6.4 PROGRAMME OF ACTIVITIES

The following table shows the expected timeline and key activities on Transparency Guidelines related issues:



2.7 FUNCTIONALITY PROCESS

The established Functionality Process, co-managed by ENTSOG and ACER and supported by the European Commission, is aimed at reaching commonly recommended solution(s) on implementation and operational issues within the existing Gas Network Codes and Guidelines which already entered into force.

The central tool of the process is the Gas Network Codes Functionality Platform (<u>www.gasncfunc.eu</u>) which was launched in February 2016.

After an issue has been reported, ACER and ENTSOG will jointly validate, categorise, and prioritise the raised issues and produce solutions taking into account stakeholders' views.⁴ The process includes data collection, launch of public consultations, and analysis of results.

⁴ As of June 2023, 22 issues have been reported on the FUNC Platform, 20 of which have been solved, closed, or withdrawn by the issue poster, while two of them are new or in progress.

2.7.1 OBJECTIVES

ACER and ENTSOG provide stakeholders with the Functionality Platform (FUNC Platform) to raise and discuss implementation and operational Network Codes and Guidelines issues and give them an

opportunity to be involved in developing solutions, which, at the end of the process, will aim at commonly recommended non-binding guidance.

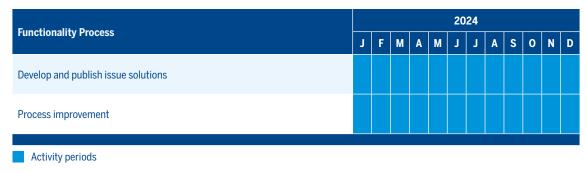
2.7.2 KEY ACTIVITIES AND DELIVERABLES

It is anticipated that ENTSOG will provide further joint ACER and ENTSOG solutions to issues posted by the stakeholders on the Functionality Platform in 2024.

In addition to the content work of producing issue solutions, ACER and ENTSOG also actively work on improving the Functionality Process itself by making it more efficient, transparent, and easier to use for the involved stakeholders. This work will continue in 2024.

2.7.3 PROGRAMME OF ACTIVITIES

The following table shows expected timeline and key activities on the Functionality Process:



2.8 SUPPORTING ACTIVITIES

2.8.1 STAKEHOLDER ENGAGEMENT ON NETWORK CODES

In the past years, ENTSOG have participated at the Network Code Implementation and Monitoring Group (NC IMG), a forum for high-level strategic coordination, with the European Commission, ACER, and the European Network of Transmission System Operators for Electricity (ENTSO-E). This group oversaw the implementation and implementation monitoring of electricity network codes and gas network codes in the EU.

Going forward, ENTSOG aims to continue transparent dialogue and effective information exchange between EC, ACER and the ENTSOs on the integration of the European electricity and gas markets and the important topics related to new legislative files and proposals, for example, "Fit for 55" initiative, Hydrogen and Decarbonised Gas Package, and the Net Zero Industry Act. This dialogue with help to reinforce the participation of the renewable energy market and drive the investments necessary to provide security of supply.



3 SCENARIOS AND INFRASTRUCTURE

The deliverables and activities outlined in this section reflect ENTSOG obligations under Regulations (EC) No. 715/2009 (3rd Energy Package), (EU) 2017/1938 (Security of Supply), (EU) 2022/869 (Energy Infrastructure Guidelines) and EU 2015/703 (Interoperability & Data Exchange Network Code) and relate to scenario development, investment and infrastructure assessment for the EU energy system.

One of ENTSOG's main deliverables are short and medium to long-term assessments such as the Union- wide Ten-Year Network Development Plan (TYNDP). In addition, the ENTSOG maps show commitment to transparency and to providing stakeholders with easily accessible and high added value information.

All these deliverables aim at developing a vision of the integrated European energy market and in particular its infrastructure component. This vision is of particular importance in view of completing the pillars of the European Energy Policy to achieve the European energy and climate targets and European commitments to the EU Green Deal and the Paris Agreement.

The TYNDP development is a three-year process (even though published every second year), with scenario development taking two years, and the infrastructure and project assessment taking an additional year. The TYNDP Scenarios are jointly developed by ENTSOG and ENTSO-E following an extensive engagement and cooperation with external stakeholders. This process is the entry point to two parallel subsequent processes, to which ENTSOG provides its support: the development of

the Gas Regional Investment Plans (GRIPs) and the Projects of Common Interest (PCI) selection process. The overall TYNDP and subsequent processes take a total of four years and are repeated every second year.

Regulation (EU) 2022/869 (TEN-E) identifies 11 priority corridors and 3 priority thematic areas to develop and interconnect. The revised TEN-E Regulation updates the infrastructure categories eligible for support with an emphasis on decarbonisation, and adds a new focus on offshore electricity grids, hydrogen infrastructure and smart grids.

In parallel, in light of Russia's invasion of Ukraine, the EC published the REPowerEU Plan to rapidly reduce dependence on Russian fossil fuels and fast forward the green transition. This will be taken into account when developing the forthcoming TYNDP 2024.

3.1 OBJECTIVES

- To assess the contribution of infrastructure solutions under different scenarios to the European Energy Policy, in particular sustainability, security of supply, competition and market integration, as well as to assess the European supply adequacy outlook through modelling of the integrated network and development of supply and demand scenarios.
- To support the investment process starting from gap identification through to the coming on-stream of the respective infrastructure solutions
- To support the Regional Groups, established by the European Commission, in the PCI selection process by providing the technical background and methodologies related to the cost-benefit analysis of projects.
- ✓ To provide support to institutions and stakeholders in the understanding of gas infrastructure
- ✓ To develop ENTSOG skills, methodologies and tools to sustain the achievement of the above objectives.

3.2 KEY DELIVERABLES AND ACTIVITIES

- ✓ Finalise TYNDP 2024 Scenarios
- Start TYNDP 2026 Scenarios development cycle
- ▲ TYNDP 2022 project-specific cost-benefit analysis
- Support to the PCI Project Collection and the 7th PCI Selection Process (2nd PCI Process under the revised TEN-E).
- ✓ Transmission Capacity Map 2024 publication
- ✓ System Development map 2023 publication
- Adapt ENTSO-E/ENTSOG Consistent and Interlinked Model for TYNDP 2024 and future editions.
- ✓ Start drafting process for TYNDP 2024

3.2.1 SCENARIOS FOR TYNDP 2024

The TYNDP 2024 Scenario development process takes two years in total, starting in 2022. As part of the Interlinked Model, it will build on continuous cooperation between ENTSOG and ENTSO-E and external stakeholders, allowing for the evolution of policy and technology to be considered, and the experience gained from TYNDP 2022 as well as the joint focus study on the interlinkages between gas and electricity sectors. In this regard, the ENTSOs will further develop their methodology on the development of full-energy scenarios, including aspects of sector coupling such as hybrid demand solutions and Power-to-Gas (P2G).

Building on the drafted, consulted and published TYNDP 2024 Scenario report by end 2023, ENTSOG and ENTSO-E plan to finalise the report in 2024. The final report will include the quantification of demand and supply patterns for the scenarios:

- ▲ A joint data collection for bottom-up gas and electricity data for use in the National Trends scenario.
- ▲ Electricity market simulations, including major improvements regarding sector coupling (such as market integrated P2G) primarily in the COP21 scenarios.
- Quantification of gas supply patterns, in particular extra-EU supply potentials for both methane and hydrogen, biomethane production and Power-to-Molecules.

Moreover, the ENTSOs' plan to have defined and tested their quantification methodologies and collected technical boundary conditions and trajectories for the scenarios.



3.2.2 SCENARIOS FOR TYNDP 2026

After the planned submission of the final TYNDP 2024 scenario report to ACER and EC in Q1 2024, the preparation and kick-off for the TYNDP 2026 scenarios development is expected to start in Q2 2024 in parallel with ACERs consideration and Opinion and ECs consideration and approval of the TYNDP 2024 scenario draft report. Based on

the experience of previous TYNPD scenario cycles and the two years duration of a scenario cycle, a draft TYNDP 2026 scenarios report is planned for publication in early 2025. There is high uncertainty related to this timeline, depending on factors such as approval process by EC of TYNDP 2024.

3.2.3 PROJECT COLLECTION FOR TYNDP 2024

Interested project promoters are required to comply with the Practical Implementation Document so their projects can be included in TYNDP 2024. ENTSOG will support projects promoters during the submission process.

TYNDP 2024 project collection starts at the end of 2023 and will continue in Q1 2024 and includes engagement with all relevant stakeholders, in particular with the EC and ACER. The final list of project submitted as part of the TYNDP 2024 process is planned to be finalised in Q1 2024. An important milestone for the draft TYNDP 2024 is the Infrastructure chapter.

3.2.4 HYDROGEN PROJECT ASSESSMENT FOR TYNDP 2024

Project categories were defined in the EC proposal of December 2020 for the revision of the TEN-E Regulation. On that basis ENTSOG adapted its TYNDP 2024 Practical Implementation Document as well as its Project Portal to facilitate the data collection of new project categories, with particular focus on the hydrogen-related infrastructures, and their contribution to sustainability. This included all necessary changes implemented to apply PS-CBA assessment for hydrogen projects under the new Cost-benefit analysis Methodology.

Following the publication of the first PCI list under the revised TEN-E, it is expected that EC will launch in 2024 a new PCI process in the second half of 2024.

In the second half of 2024, ENTSOG in coordination with the PCI Cooperation Platform, will prepare the project submission portal for the second PCI data collection and will prepare the dataset for project-specific cost-benefit analysis for projects applying to the 2nd PCI selection process under the revised TEN-E.

3.2.5 ENTSO-E/ENTSOG CONSISTENT AND INTERLINKED MODEL

Building on the outcomes of the study performed in 2020, ENTSOG and ENTSO-E have started adapting their Interlinked Model.

Regulation 2022/869 requires ENTSO-E and ENTSOG to jointly submit to the EC and ACER by 24 June 2025, a consistent and progressively integrated model. This model would include electricity, gas and hydrogen transmission infrastructure as

well as storage, LNG and electrolysers, covering the energy infrastructure priority corridors and the areas defined in line with the principles outlined in Annex V of the Regulation.

In 2024, ENTSOG will continue with testing the adapted version of the Interlinked Model principles. The current status is an interlinked electricity and hydrogen model, built upon the TYNDP scenarios.

3.2.6 TYNDP 2024

During 2024 ENTSOG will continue the development process for TYNDP 2024. TYNDP 2024 will cover the 2023–2050 time horizon.

Following the publication of the ENTSOG's first Hydrogen and Natural Gas TYNDP – TYNDP 2022 – ENTSOG's work on TYNDP 2024 will continue as an important platform for hydrogen projects and their assessment.

TYNDP 2024 represents the basis for the selection of the 2nd of Projects of Common Interest (PCI) list under the revised TEN-E, both to support the identification by Regional Groups of the investment needs, and to serve as basis for the project-specific cost-benefit analysis of PCI candidates.

Guided by the recently revised TEN-E Regulation, TYNDP 2024 will include the latest development of IT/R&D activities and it will be continue to improve the tool used for modelling, Plexos.

ENTSOG will publish the draft TYNDP 2024 in the second half of 2024, including the Infrastructure Report, System Assessment. Following the Draft TYNDP publication and the subsequent public consultation, ENTSOG will submit the TYNDP 2024 to ACER. Final publication will depend on the engagement with external stakeholders (ENTSO-E, ACER and EC and others) but is expected by end of 2024 or early the beginning of 2025.

3.2.7 MAPS 2024

Since its creation, ENTSOG has developed different maps, on a voluntary basis. These maps are welcomed by institutions and stakeholders as a highly useful overview and resource.

Every year ENTSOG publishes the System Development Map and starting from 2018 publish either

the Capacity Map, or the TYNDP Map with all the projects included in TYNDP, on a bi-annual basis.

In 2024, ENTSOG will publish the System Development Map and the Transmission Capacity Map, which can be obtained in hardcopy or downloaded from ENTSOG website.

3.3 SUPPORTING ACTIVITIES

3.3.1 SUPPORT TO REGIONAL GROUPS ON THE PCI SELECTION PROCESS

To the extent envisioned by the European Commission, ENTSOG will take part to the Cooperation Platform (informal working group) between the European Commission, ACER and ENTSOs, and will participate in and support the work of the Regional Groups established by the EC in the tasks of operating the 2nd PCI selection process under revised TEN-E and monitoring PCIs.

ENTSOG will support promoters of projects applying for the PCI label, as for the previous PCI selection processes, including through the handling of Project-Specific cost-benefit analysis (PS-CBA) as part of TYNDP, in line with its CBA Methodology, subsequent TYNDP improvements, and ACER recommendations. The publication of PS-CBA results will provide a transparent tool to all concerned stakeholders taking part to the 2nd PCI process under revised TEN-E.

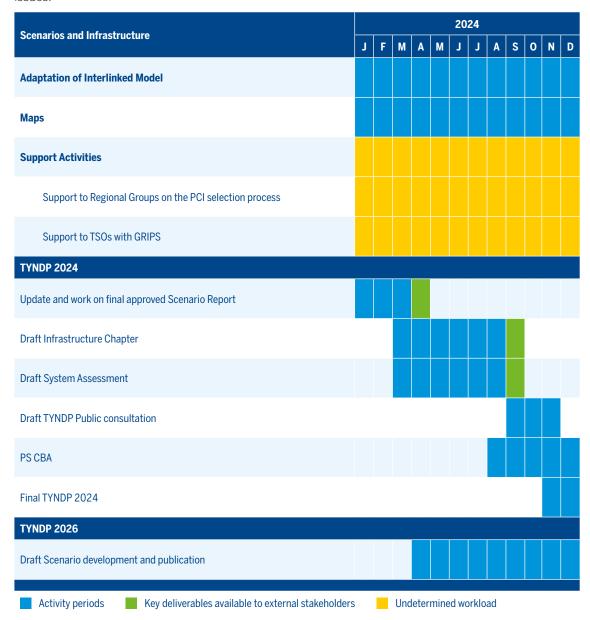
3.3.2 **GAS REGIONAL INVESTMENT PLANS (GRIPS)**

TSOs regional cooperation to produce Gas Regional Investment Plans (GRIPS) will continue, and

ENTSOG will support TSOs in the development of the next edition of their GRIPS.

PROGRAMME OF ACTIVITIES 3.4

The following table shows the expected timeline and key activities on Scenarios and Infrastructure related issues:





4 SECURITY OF SUPPLY

After the gas crises of 2006 and 2009, the EU reinforced its security of gas supply, notably by adopting the first security of gas supply Regulation (EU) 994/2010 in 2010. On 28 October 2017 a revised Regulation (EU) 2017/1938 concerning measures to safeguard the security of gas supply and repealing Regulation (EU) 994/2010 entered into force. This security of gas supply Regulation, as well as (EC) No. 715/2009, were amended by Regulation (EU) 2022/1032 with regard to gas storage.

In a broader context, Council Regulation 2022/2576 (Enhancing Solidarity) and Council Regulation 2022/2578 (Market Correction Mechanism) were also created to enhance security of supply in Europe.

The impact of the Russian invasion of Ukraine has shown that the existing security of supply rules were, however, not adequately adapted to sudden major geopolitical developments, where supply shortages and price peaks may not only result from the failure of infrastructure or extreme weather conditions, but also, as seen recently, from intentional major events and longer lasting or sudden supply disruptions. It was and is therefore necessary to address the increased risks resulting from the current geopolitical situation, including the diversification of the EU's energy supplies. ENTSOG will

continue to contribute to supporting the adoption of new rules and legislations for security of gas supply, and will continue to take part in the works of the Gas Coordination Group (GCG) and ensure functionality of the Regional Coordination System for Gas (ReCo System for Gas).

Within the GCG crisis management formation ENTSOG can facilitate the coordination and assist to develop channels for communication with all relevant actors and collect any information relevant to the security of gas supply at national, regional, and EU level.

Considering perspective developments of hydrogen production and transportation infrastructure, ENTSOG will evaluate how security of supply risks can also be addressed on the basis of the further development of such infrastructure.

4.1 OBJECTIVES

- ✓ Facilitate regional cooperation for security of supply (SoS) and operational issues.
- Within the framework of the revised SoS regulation, facilitate the functioning of the Regional Coordination System for Gas (ReCo System for Gas) as CNOT for emergency conditions and the incidents classification scale (Art 8(3)c) Regulation (EC) 715/2009). ReCo will continue its 24/7 exchange platform and coordinate work to help address security of supply challenges in Europe.
- Support the GCG and relevant stakeholders in the implementation of the SoS regulation and the assessment of European SoS.
- ✓ Provide support to institutions and stakeholders in the provision of gas demand and supply outlooks, reviews, and monitoring activities.

4.2 KEY DELIVERABLES AND ACTIVITIES

- ✓ Summer Supply Outlook 2024, with winter 2024/25 overview.
- ▲ Summer Supply Review 2023.
- ✓ Winter Supply Outlook 2024–2025, with summer 2025 overview.
- ✓ Winter Supply Review 2023–2024.
- Support functioning of the ReCo System for Gas.
- Support to the Gas Coordination Group.
- Support the EC in relation to SoS topics.
- ▲ Cooperation with non-EU TSOs and coordination of SoS activities.
- Run communication and tabletop exercises for better risk preparedness.

- Develop and adopt updates to the existing ReCo System for Gas and Incidents classification scale.
- ▲ Maintain existing tools for gas flow patterns monitoring and evaluate new patterns.
- ✓ Facilitate the monitoring of the market correction mechanism, including monitoring the effects of the dynamic bidding limit on financial and energy markets and on security of supply in the case of the activation of the market correction mechanism.
- Monitor the filling of the European gas storage facilities according to the targets set for the yearly and intermediate filling level.

4.2.1 OUTLOOKS AND REVIEWS

4.2.1.1 Summer Supply Outlook 2024 with winter 2024/25 overview and Summer 2023 Review

ENTSOG plans to publish its Summer Supply Outlook 2024 in April 2024, including a winter 2024/25 overview, to inform stakeholders very early in the injection season. To develop this report, ENTSOG builds on the experience gathered since 2010 taking due account of ACER opinions and stakeholder feedback. The report benefits from the latest development of IT/R&D activities in the fields of modelling, supply and demand approaches.

Summer Supply Outlook will assess the ability of the European gas infrastructures to provide flexibility while enabling shippers to fill storage in preparation of the winter, also in the context of the current geopolitical situation. This report assesses the level of service provided by infrastructures considering the latest trends in supply and demand – it does not intend to forecast market behaviour. As for the Supply Outlooks since 2013, EC and Member States, through the GCG, can request ENTSOG assessments for specific situations.

Along with its Summer Supply Outlook 2024, ENTSOG will also deliver on a voluntary basis the Summer 2023 Review: a description of the behaviour of the gas market during the summer months of 2023 on the basis of the observed daily gas flows and prices. It will provide the opportunity to investigate the short-term demand and supply trends and especially the dynamic of the gas demand for power generation. The Review will cover any relevant events taking place during the period.

This analysis will then be factored in ENTSOG's research and development activities for further improvement of approaches for future deliverables.

4.2.1.2 Winter Supply Outlook 2024–2025 with summer 2025 overview and Winter 2023–2024 Review

ENTSOG plans to publish its Winter Supply Outlook 2024–2025 in October 2024, including a summer 2025 overview, to inform stakeholders very early in the storage withdrawal season. To develop this report, ENTSOG will build on the experience gathered since 2010 taking due account of ACER opinions and stakeholder feedback. The report will benefit from the latest development of IT/R&D activities in the fields of modelling, supply and demand approaches.

Winter Supply Outlook will assess both the possible evolution of gas storages inventory along different winter cases as well as the resilience of the European gas infrastructures under peak conditions, also in the context of the current geopolitical situation. This report assesses the level of service provided by infrastructures considering the latest trends in supply and demand – it does not intend to forecast market behaviour. As for all Supply Outlooks since 2013, EC and Member States, through the GCG, may request ENTSOG assessments for specific situations.

Along with the Winter Supply Outlook 2024–2025, ENTSOG will also deliver on a voluntary basis the Winter 2023-2024 Review, a description of the behaviour of the gas market during the winter months of 2023-2024 on the basis of the observed daily gas flows and prices. It will provide the opportunity to investigate the short-term demand and supply trends and especially the dynamic of the gas demand for power generation. The Review will cover any relevant event taking place during the period.

This analysis will then be factored in ENTSOG research and development activities for further improvement of approaches for future deliverables.

4.2.2 **REGIONAL COORDINATION (RECO) SYSTEM FOR GAS**

ENTSOG will ensure facilitation of the existing ReCo System for Gas as a CNOT for emergency conditions, including the incidents classification scale, and other supporting documentation for the ReCo Teams. Following the ReCo System for Gas common procedures, TSOs and ENTSOG will identify which TSOs will take the role of the 24/7 facilitators for the existing ReCo Teams Europe, East, North-West and South in 2024–2025 and will undertake relevant communication and tabletop exercises.

The Russian invasion of Ukraine in 2022 triggered a very close cooperation between TSOs, with communication on a daily basis and the identification of the need to closely monitor the gas flows all over Europe. In this respect, ENTSOG developed in 2022 online dashboards which included data for capacity usage and gas supply corridors distribution. ENTSOG made these publicly available on its website and will continue to provide the dashboard data update in 2024 and beyond.

ENTSOG will continue to share aggregated information about gas flows in the EU, flow patterns, and SoS updates with TSOs and relevant stakeholders such as EC and ACER, and to publish information on its website.

ENTSOG, in coordination with the European ReCo Teams, will facilitate strengthening the cooperation in the energy sector in the case of sudden 'stress' events in addition to normal conditions and planned events, in particular with electricity TSOs (ENTSO-E), and other relevant associations.

ENTSOG will continue facilitating the coordination of TSOs' maintenance plans. Additionally, TSOs will continue to closely cooperate in coordinating and planning the maintenance of networks to minimise any disruption of transmission services to network users and transmission system operators in general, and to ensure equal benefits with respect to security of supply particularly in relation to transit.

To enhance coordination between TSOs in normal and emergency conditions (following ACER's opinion No. 09/2019 on the adoption of ENTSOG's common network operation tools5), ENTSOG and TSOs will continue their work on developing visualisation solutions for exchange of operational data between TSOs. Better information for all TSOs can contribute to a more efficient and secure management of the gas transmission systems by allowing faster and more efficient preventive and remedial actions by TSOs to emergency situations. In this regard, ENTSOG developed internal tools for TSOs for observing SoS situation closely and will further enhance these in 2024 with appropriate functionalities improving usability.

⁵ See opinion no 09/2019 of the Agency for the Cooperation of Energy Regulators (ACER) here.



4.3 SUPPORTING ACTIVITIES

4.3.1 SUPPORT TO GAS COORDINATION GROUP (GCG)

ENTSOG will continue to support the EC and the GCG in the implementation of the current SoS regulation and follow tasks given by the GCG. On request of the EC, SoS updates will be provided in GCG meetings. Through the GCG and when preparing Supply Outlooks, ENTSOG will continue to encourage Member States to feedback on particular cases of interest.

Furthermore, ENTSOG will support the TSOs and MS in the risk assessment for the defined groups based on the results of the Union-wide simulation.

The team will assist the TSOs and competent authorities in the establishment of the preventive action and emergency plans, and possible new documentation regarding potential threats to business continuity as seen during the recent pandemic and other unplanned situations. If required, ENTSOG will support the TSOs and competent authorities to agree on the technical arrangements for the application of the solidarity principles. As has been undertaken to date, ENTSOG will continue to support the EC and the TSOs in conducting ad hoc analysis investigating the different geopolitical challenges in the context of the security of gas supply.

4.3.2 TECHNICAL COOPERATION BETWEEN MEMBER STATES, ENERGY COMMUNITY AND THIRD COUNTRY TSOs

In 2024, ENTSOG will continue to support Energy Community Contracting Parties and third countries TSOs concerning security of supply. In particular, assistance will be provided to enhance technical cooperation with the third country TSOs supplying or transiting gas to the EU, to exchange technical and operational information in case of unforeseen stress events.

ENTSOG will continue to organise meetings in the framework of the External Contact Platform (ECP) in cooperation with the Energy Community Secretariat in Vienna. This platform was developed by ENTSOG and the Energy Community Secretariat, to strengthen ENTSOG's cooperation with non-EU gas

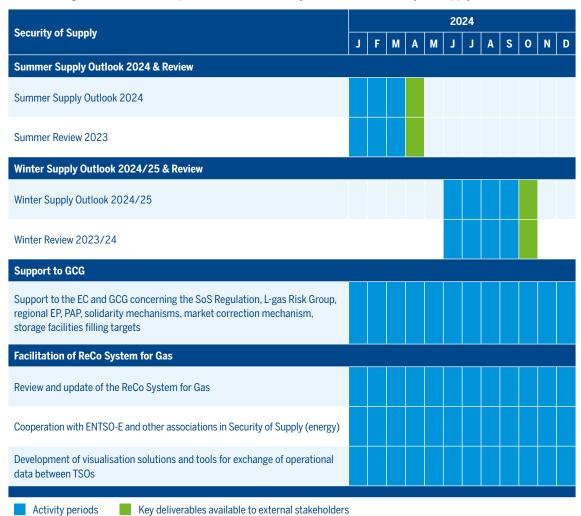
transmission companies, including those from the Energy Community countries. In 2024, there will be continued support for the TSOs of Member States, Energy Community and third countries in the implementation of the EU NC rules by expanding regional cooperation, via workshops or meetings organised by ENTSOG.

ENTSOG plans to organise a possible workshop between EU TSOs and relevant adjacent non-EU TSOs (e.g., TSOs from North African countries, Turkey and parties acting as TSOs) supplying or transiting gas to EU, to discuss future steps for strengthening technical cooperation.



PROGRAMME OF ACTIVITIES 4.4

The following table shows the expected timeline and key activities on Security of Supply related issues:





5 ENERGY **TRANSITION**

The EC developed in 2021 and 2022 new energy and climate related legislation in the context of the European Green Deal, the 'Fit for 55' legislative package, and the Hydrogen and Decarbonised Gas Market package, which also includes an update to the current gas market design and has been recently complemented by the REPowerEU Plan.

In 2023 most of the legislative files were finalised (e.g., the revision of Gas and hydrogen markets Regulation and Directive, revision of Renewable Energy Directive, revision of Energy Efficiency Directive, and revision of the EU Emissions Trading System) and it anticipated that these will progress to be subsequently implemented in 2024.

These files provide for new elements as well as adjustments to the current gas regulatory framework. Therefore the upcoming implementation will be of particular relevance, impacting ENTSOG and TSOs activities for the coming years.

ENTSOG's engagement in the energy transition related activities have focused on two core topics:

- 1. Energy system integration via cooperation with gas, hydrogen and electricity value chains
- Decarbonisation of gas sector with uptake of renewable and low-carbon gases – via coordination with gas, hydrogen and biomethane stakeholders.

ENTSOG continuously underlines the synergies of electricity and gas systems integration and the importance of planning for hydrogen production centres and transmission capacities. In this regard, in 2024, ENTSOG will continue activities in relation to the published Hydrogen and Natural gas TYNDP 2022 and update the joint Hydrogen Infrastructure map to provide an up-to-date picture on the planned hydrogen infrastructure projects. In 2024, ENTSOG will further engage in the European Clean Hydrogen Alliance's Roundtable on Transmission and Distribution with activities focusing on implementation of hydrogen transport and storage projects and mapping of dedicated financing.

ENTSOG will facilitate the preparation of the Roundtable's three main deliverables:

- Report on implementation of Learnbook on Hydrogen Supply Corridors
- Report highlighting potential financing options and existing funding gaps to finance hydrogen projects
- 3. Learnbook on Hydrogen Imports infrastructure

To achieve these ambitions in time and the scale needed for effective implementation of the REPowerEU Plan, ENTSOG will integrate the information based on the TYNDP 2022 project collection, as well as IPCEI and European Clean Hydrogen Alliance project collections, to facilitate appropriate network planning and assessment for the grid users.

ENTSOG will continue dialogue with relevant stakeholders from the hydrogen, electricity, and gas value chains. Engagement with storage and LNG system and ports operators, DSOs and hard-to-decarbonise off-takers of hydrogen are of particular relevance.

With the finalisation of all the legislative files, the activities for 2024 will focus on implementation. Therefore, ENTSOG will support the Members to ensure proper implementation of the needed regulatory framework and monitor the transposition into the national laws. Key topics relate to unbundling, tariffs, financing of networks, guarantees of origin/certificates, gas quality and hydrogen transport and handling, methane emissions, security of supply including cybersecurity and regional cooperation.

On these topics, ENTSOG will consider any applicable initiatives and proposals published by the EC, ACER or other relevant stakeholders as well as liaise internally with different ENTSOG working groups and task forces.

5.1 OBJECTIVES

- Monitor key energy/climate policy and regulatory developments put forward by EU institutions.
- Support ENTSOG's Members in implementation of the EC's legislative proposals for the EU gas sector, specifically the Hydrogen and Decarbonised Gas Market Package.
- ✓ Communicate ENTSOG's positions regarding the legislative and policy proposals developed for the EU gas sector, including hydrogen, and its integration with other energy sectors.
- ▲ Engage in dialogue with EC, ACER, industry associations, energy sector associations and other key EU stakeholders.
- Propose the practical solutions for the implementation of the integrated planning for gas and hydrogen, security of supply and market development.
- Facilitate effectively and transparently the European Clean Hydrogen Alliance Roundtable on Hydrogen Transmission and Distribution based on the rules agreed with the EC (DG GROW and DG ENER).

- Coordinate and exchange with stakeholders along the whole value chain on how gas grids can transition via the ENTSOG Advisory Panel for Future Gas Grids (including CEOs of Brussels-based associations of producers and consumers from gas, hydrogen and electricity value chains).
- Develop communications to assist stakeholders understand how gas grids can contribute to decarbonisation and the energy transition in different sectors of the EU economy.
- Support in developing positions on measures that are needed at a national level to facilitate deployment of new TSO products and services to facilitate decarbonisation and the energy transition.

5.2 KEY ACTIVITIES AND DELIVERABLES

- ▲ ENTSOG's support to Member in implementation of regulatory framework in context of European Green Deal and 'Fit for 55' legislative package and the Hydrogen and Decarbonised Gas Market Package, including Revised Gas Regulation and Directive, and on the Methane Emission Reduction Regulation.
- ENTSOG's responses to relevant public consultations and stakeholders' engagement processes contributing with facts, figures, and proposals for technical standards and solutions for market, grids and operations integrating gas, hydrogen and electricity value chains.
- ▲ Communication of ENTSOG proposals on integration of gas and hydrogen planning, security of supplies and market development.
- ▲ ENTSOG's positions for the Copenhagen, Florence and the Madrid Fora.

- ENTSOG's positions on all relevant reports and studies concerning strategic topics in relation to market design, grid planning and grid operations.
- ✓ Engagement with stakeholders via the Advisory Panel for Future of Gas Grids.
- Support for European Clean Hydrogen Alliance work, specifically on Clean Hydrogen Transmission and Distribution Roundtable.
- Participation in Prime Movers on Guarantees of Origin.
- ✓ Participation in Prime Movers on Gas Quality and Hydrogen Handling⁶
- → Participation in Clean Hydrogen Partnership
- → Participation in Investors Dialogue on Energy

⁶ Depending on topic-related developments, the engagement could take place either via the continuation of the dedicated Prime Movers' Group on gas quality and hydrogen handling or stakeholder workshops. Please, note that the Prime Movers' Group is currently in stand-by mode.



5.3 PROGRAMME OF ACTIVITIES

The following table shows the expected timeline and key activities:

Activities		2024										
		F	М	A	М	J	J	A	s	0	N	D
Monitor implementation of key EU energy & climate policy and regulatory files												
Provide feedback to relevant EU public consultations												
Develop ENTSOG's contributions to identified strategic projects/reports/studies												
Develop ENTSOG's positions for the 2023 Copenhagen, Florence Madrid Fora												
Communicate ENTSOG's views on strategic projects to stakeholders (including EC)												
Facilitate and support work of the Hydrogen Transmission & Distribution Roundtable of the European Clean Hydrogen Alliance												
Exchange and coordinate with stakeholders on key technical, regulatory and market relevant topics via Advisory Panel for Future Gas Grids												
Prime Movers on Guarantees of Origin												
Clean Hydrogen Partnership												
Investors Dialogue on Energy												
Provide support to ENTSOG's Members regarding the development of any new TSO products and services which can contribute towards meeting decarbonisation and EU climate neutrality targets												

Activity periods



6 RESEARCH & DEVELOPMENT

6.1 OBJECTIVES

Regulation EC No. 715/2009 requires that the ENTSOG Annual Work Programme includes a list and description of its research and development activities. ENTSOG is committed to working towards and promotion of innovation and improvement of processes of its Members' activities and

strives to meets challenges on an ongoing basis. This is evidenced in this section, in which the tools, methodologies, stakeholder engagement processes and IT solutions are outlined to address potential difficulties and to improve our way of working.

6.2 **KEY DELIVERABLES AND ACTIVITIES**

6.2.1 PROMOTING TSO INNOVATIVE ACTIVITIES

In 2024, ENTSOG will continue its work to actively engage with its Members to further develop the database of TSO Research, Development and Innovation (RDI) activities by using the Innovative Projects Platform (IPP), which is available on ENTSOG's public website. This platform includes best practices applied by EU TSOs for technology development, regulation and business models and partnerships. The purpose of this exercise is to showcase TSOs decarbonisation projects as

examples of how to achieve current EU energy and climate goals of reducing GHG emissions by innovating in the gas sector, including in hydrogen.

ENTSOG will work on documenting the emerging hydrogen value chain developments via updating the projects database and illustrating the technical solutions for blending and pure hydrogen possible pathways with repurposed/retrofitted gas grids. ENTSOG will continue to promote the IPP via its social media and other media channels.

6.2.2 HYDROGEN PROJECT VISUALISATION PLATFORM

In 2021 ENTSOG developed the Hydrogen Project Visualisation Platform based on open-source data and intends to provide a comprehensive overview of current hydrogen projects along the whole value chain - from production, via transmission and distribution to end-use. It shows where the first hydrogen valleys could emerge and how they can be connected via retrofitted & repurposed pipelines based on planned and ongoing hydrogen projects collected. ENTSOG will continue in 2024 to update the map periodically.

6.2.3 JOINT MAPPING OF HYDROGEN INFRASTRUCTURE

The 36th European Regulatory Forum for Gas (Madrid Forum) conclusions in 2022 identified a joint action to be undertaken by the gas infrastructure industry (ENTSOG, EHB, GIE, CEDEC, Eurogas, GEODE and GD4S) to visualise all hydrogen infrastructure projects collected under different existing processes in the form of a map. Together with the relevant stakeholders, ENTSOG in 2023 developed a public **joint Hydrogen Infrastructure Map** to map all planned hydrogen infrastructure projects based on bottom-up data collection process. The aim was to present the data in an interactive,

user-friendly and publicly accessible map that could be used by stakeholders and policy makers. The interactive Hydrogen Infrastructure map brings together the hydrogen perspective and projects of Transmission System Operators (TSOs) of gas, Distribution System Operators (DSOs), Storage System Operators (SSOs) and LNG System Operators (LSOs), as well as third party promoters developing projects in consortia along the whole value-chain. In 2024, ENTSOG will continue to develop the map further to ensure the information is up to date and comprehensive.

6.2.4 EXPLORING A 'TRI-INTERLINKED MODEL'

In 2024, ENTSOG's system development team will continue to develop advanced sector coupling models. The development of the interlinked model is a joint project conducted with ENTSO-E. Currently, the task force has focused on the development of a hydrogen – electricity interlinked model, which can be used to perform cost benefit analysis on projects submitted to both ENTSO-E and ENTSOG.

In 2024, this model will be extended to include the methane system, which has historically been used

for the gas TYNDP. This model can be used for a range of purposes including cost benefit analysis, system needs analysis, scenario development, supply to gas turbines, steam methane reforming and the impact of repurposing methane infrastructure for hydrogen use.

Additional possible areas in the upcoming development of the Interlinked Model are offshore wind hubs, hybrid heating and production of synthetic fuels.

6.2.5 HYDROGEN AND GAS QUALITY ASSESSMENT

ENTSOG will progress in assessing the tolerance for different levels of hydrogen concentration in the gas grid system, analyse the feasibility and verification of all pathways, which are hydrogen backbone, methane backbone, and hydrogen/methane blended networks. Furthermore, to support the cost-effective integration of renewable and low carbon gases such as synthetic methane, biomethane, and hydrogen in the network (in accordance with consumers' needs and gas quality requirements), ENTSOG is committed to further work in analysing the possibilities of deploying smart grid solutions and digital tools for gas quality and hydrogen handling. This could include digital systems for online gas quality tracking and forecasting, sensor

technologies for interactive and intelligent metering, among others.

Furthermore, taking into account the European Commission's proposal for the Hydrogen and Decarbonised Gas Package, ENTSOG will continue working closely with its members and stakeholders in assessing the potential achievable hydrogen purity levels for repurposed gas grids, the potential implementation of hydrogen blends and a maximum allowable oxygen level at IPs for the unhindered cross-border flow hydrogen blends and of biomethane, and the Wobbe Index classification system for exit points (based on the CEN SFGas GQS proposal?).

⁷ CEN Sector Forum Gas WG Gas Quality Study 'Prenormative Studies of H-Gas quality parameters' (short CEN SFGas GQS), in support of EC Mandate M/400 on gas quality harmonisation, came up with a proposal for the Wobbe Index in the standard for H-gas (EN 16726): A recommendation for a single EU WI entry range and the requirement of a WI classification system at exit to the end-use applications using H-gas.

6.2.6 **CYBERSECURITY ASSESSMENT**

In 2024, ENTSOG IT will continue its activities to protect its information assets from potential cybersecurity attacks while also ensuring organisational operational efficiency. This ongoing programme includes development and implementation of policies, controls and governance.

Additionally, ENTSOG will continue together with GIE as a partner of the Joint Cyber Security Task Force its coordination and dialogue with relevant parties in the field of cybersecurity as well as closely observe the further steps regarding the implementation of the NIS 2.0 Directive. The planned ENTSOG annual data exchange workshop will be supplemented by a dedicated, full-day cybersecurity session involving ACER, ENISA, EDA, EU DSO, TSOs and critical infrastructure organisations.

ENTSOG will continue to participate in the ENISA cyber security briefings which provides ENTSOG with bi-weekly cyber security threat analysis. The aim is to provide pro-active, early warnings to TSOs (when required) in the event of any upsurge or imminent cybersecurity threat to prepare and plan. As part of an ongoing collaboration with ENISA, ENTSOG will support the goal to raise awareness on cybersecurity issues throughout the gas sector. This will be achieved by organising various cybersecurity awareness events (tabletop exercises, courses, information sessions) which are delivered by ENISA staff and promoted to ENTSOG's gas community.

ENTSOG will continue to use the ReCo system to inform TSOs on cybersecurity incidents affecting dispatching and operational procedures and review malware information sharing platforms when required.

PROGRAMME OF ACTIVITIES 6.3

The following table shows the expected timeline and key activities on Research and Development-related issues:

Research and Development		2024										
		F	M	A	M	J	J	A	s	0	N	D
Promoting TSO Innovative Activities												
Visualisation of hydrogen projects and creation of project database												
Joint mapping of hydrogen infrastructure												
System Development 'Tri-Interlinked Model'												
Hydrogen and Gas Quality assessment												
Cybersecurity assessment												

Activity periods



7 ENTSOG SUPPORTING ACTIVITIES

7.1 OBJECTIVES

With the support of its Members and the guidance of its steering bodies, the Management Support team coordinates and supports the work of ENTSOG. It prepares, arranges, and coordinates the various General Assembly and Management Board Meetings and maintains an overview on all organisational activities. It is structured in various management support functions that work with the Brussels team but also directly with the Members. With a growing number of cross-organisational projects and interlinked activities, the Management Support team supports ENTSOG planning, management, and execution.

The Management Support team also prepares the strategic processes aimed at defining the ENTSOG profile and taking care of the consistent application of those strategic orientation lines in organisation practice. The team aims to establish and maintain the most efficient structure to support all organisational Business Areas (i.e., Market, System Development, System Operation and Strategy, Policy and Communications) and the related working groups (WGs) and Task Forces (TFs). That includes the planning and development of financial and human resources but also the communication flow within the association and to its stakeholders.

ENTSOG will continue to internally evaluate the risks that present challenges to meet its objectives, activities, and deliverables, addressing regulatory, legal, finance and human resource aspects. Risk assessment and plans for proper mitigation measures will be supervised by ENTSOG's steering bodies.

A high-level overview of the main risks and associated mitigation measures are outlined in the table included in Section 7.2.4.

KEY DELIVERABLES AND ACTIVITIES 7.2

7.2.1 **LEGAL AND CORPORATE AFFAIRS**

The ENTSOG Legal Team ensures compliance of ENTSOG with the applicable law and the regulatory framework while carrying out its missions. It undertakes the day-to-day activities of the Association from the legal perspective as well as supporting activities undertaken by the different Business Areas and their respective WGs.

In 2024, this support will continue with respect to the implementation of the existing network codes and in some cases effect monitoring. The Legal Team will in particular support WGs and TFs established or to be established with the aim to implement/interpret the new Hydrogen and Decarbonised Gas Market Package of legislation. The Legal Team will also support the System Development team by providing legal assistance on the development of the forthcoming TYNDP.

The Management support team will continue to facilitate meetings of the External Contact Platform (ECP), a platform developed by ENTSOG and the Energy Community Secretariat, to strengthen ENTSOG's cooperation with non-EU gas transmission companies, including those from the Energy Community countries.

The Management support team will also continue to facilitate the meetings and the activities of the EU-UK Gas TSOs Task Force, which was created in 2021 as the interface between ENTSOG and the UK TSOs. This is upon request of the EC and the UK Government in accordance with the Trade and Cooperation agreement concluded by the EU and the UK following the Brexit. The main goal of this Task Force is to ensure further cooperation between the EU and the UK TSOs.

To address the legal issues arising out of meetings of the ENTSOG Working Groups, the Legal Team coordinates the activities of the Legal Advisory Group (LAG), which convenes for monthly meetings. The LAG is the ENTSOG legal working group composed of ENTSOG members' representatives from legal staff of the TSOs.

On a day-to-day basis, the Legal Team and Management support provides legal assistance and advice to the management, the Board and the General Assembly in terms of governance. The Legal Team is also ensuring the compliance of the Association with national law applicable to companies and associations.

Depending on the final outcome of the Hydrogen and Decarbonised Gas Market package of legislation, the Legal Team and Management support might be required to assist the association in adjusting ENTSOG statutes and ways of working to the requirements of Hydrogen and Decarbonised Gas Market Package, as needed.

7.2.2 FINANCE AND HR

7.2.2.1 Finance

ENTSOG is an international non-profit association (AISBL) established according to Belgian law. The highest decisive body of ENTSOG is the General Assembly which meets four times a year. ENTSOG is financed by its Members. The member TSOs contribute to the budget according to the number of kilometres of gas grid, population of the country and in some cases to special EU Grid connection significance.

With regards to financial reporting, ENTSOG created and implemented clear and efficient accounting procedures and controls.

In 2010, a Financial Committee has been established and the main tasks of the Committee are as follows:

- checking the compliance with local laws and obligation
- advising on the association's Budget
- validating the closure of the accounting year and balance sheet
- reporting on a quarterly basis to the Board and General Assembly on account situation

Financial Committee meetings are held five times per year.

7.2.2.2 Human Resources

ENTSOG is committed to meet the targets of the Third Energy Package. But this requires a well-prepared recruitment pipeline so that ENTSOG will have the relevant resources and competences to perform the requested activities.

By the end of 2023, the ENTSOG Team in Brussels consists of forty-one persons and a replacement plan is in place to prepare for replacement of seconded persons whose contracts expire.

ENTSOG is comprised of:

- ✓ Seconded staff from its members typically seconded for 3–5 years
- ✓ Direct employees
- ▲ External consultants

The ENTSOG staff consists currently of 19 different nationalities and representing 11 companies, which provides a unique and challenging international working environment.

Key responsibilities of the Adviser role include leadership and support for internal work groups, external workshops and meetings, as well as participation in processes led by the European Commission, ACER and other European authorities.

ENTSOG has a strong focus on the resource allocation as well as the relevant hand-over processes to ensure the performance of the organisation vis-àvis the required deliverables. Systematic planning of resources replacement and knowledge transfer allows for the mitigation of risks which may affect the business continuity of the association.

ENTSOG Staff	31.12.2022	31.12.2023
General Director	1	1
Directors	4	4
Manager/Advisers	34	33
Senior Assistants	2	2
Assistants	1	1
Total	42	41

7.2.3 INFORMATION TECHNOLOGY (IT)

The ENTSOG IT team provides IT support and services to the ENTSOG team (i.e., management and the Business Areas), its members and other ENTSOG stakeholders (e.g., ACER, EC). The figure below outlines the key delivery and support activities which are the responsibility of the IT team.

Working with several IT providers, vendors and IT contractors, the IT team plans, manages, builds, and operates IT systems to support ENTSOG advisors and their activities; they also provide IT support to ENTSOG stakeholders in the use of ENTSOG's data and systems.

The ENTSOG IT systems include:

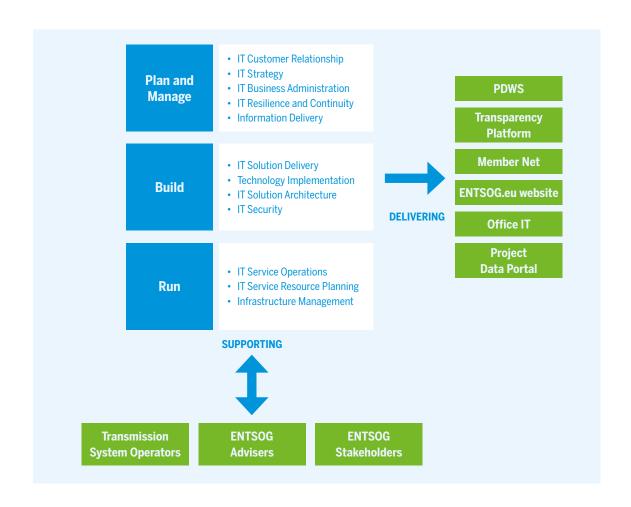
- ✓ Professional Data Warehouse (PDWS) (including a Data Portal for reporting)
- ✓ Portal for Projects Data Collection
- ▲ Modelling Database for SysDev
- ▲ Content Management Solution (Membernet)
- **▲ ENTSOG Website**
- ▲ ESRI ArcGIS solution or QGIS

- ✓ ReCo 2.0
- ✓ PLEXOS tool for simulations
- ▲ ETM tool (Energy Transition Model) used in collaboration with ENTSO-E
- ✓ Office IT Network, Laptops, Mobile phones, Conferencing Audio-Video, etc.
- Azure infrastructure for the multiple internal tools and projects

Following a review of its IT systems in 2019, ENTSOG will plan the replacement/upgrade of ENTSOG's IT assets in the coming years to deliver secure, integrated, and cost-effective IT solutions for ENTSOG. The targeted services for these upgrades in 2021 and 2022 were the TP, PDWS and ArcGIS systems.

In 2023 and 2024 ENTSOG will continue to add to its technology stack tools, such as PLEXOS and ETM:

✓ The TP upgrade analysis commenced in 2019 with main delivery in early 2022 when all the PDWS and TP infrastructure was migrated to Azure cloud. The fine-tuning continued in 2023 and new improvements will be added in 2024.



- ✓ One of the purposes of PDWS is the reporting feature. This was improved in 2020 by migrating some or building new reports in <u>Power BI</u> (a business analytics service that delivers insights by transforming data into visuals which can be shared and collaborate on), and the task will continue in 2023 and 2024.
- ESRI ArcGIS software implementation, which had commenced in 2019 as part of IT R&D strategy and BI vision will continue in 2024, possibly by adding the new hydrogen infrastructure map (initially mapped using with QGIS).
- Besides the PDWS/TP infrastructure migration to cloud, another project delivered in 2022 was the SharePoint upgrade of the Data Portal. In 2023 ENTSOG fine-tuned the release and new functionalities will be brought in during 2024.

- ✓ In 2022 the development of the Modelling Database commenced by using Azure Data Factory. This will continue in 2023 and 2024 by using PLEXOS for the simulations.
- ✓ For the office IT, the main project in 2022 2023 was the Active Directory (AD) migration to Azure cloud and fine-tuning of policies in InTune. For 2024 ENTSOG will have a complete cloud-based infrastructure for ENTSOG, including both servers and devices.
- ✓ The development of ReCo 2.0 commenced in late 2021 and continued throughout 2022 and 2023 for its different phases. In 2024 ENTSOG will evaluate the solution built so far, and plan for future phases if needed.
- ▲ A joint project with ENTSO-E will require the use of the solution called Energy Transition Model (ETM)

7.2.4 RISK AND MITIGATION

ENTSOG strives to meet challenges and potential risks on an ongoing basis. The core ENTSOG organisational structure, with the flow of information between the ENTSOG Members, Board and General Assembly ensures that the correct mechanisms are in place to anticipate in advance any potential risks. ENTSOG Working Group, Task Force and Standing group meetings occur at minimum monthly, and ad hoc as needed. Additionally, ENTSOG is in direct and frequent communication with ACER and European Commission, as ENTSOG tasks are embedded in Regulation (EC) 715/2009.

ENTSOG and ACER's Network Code Functionality Platform allows for the identification by market participants of the effectiveness of the implementation of the Network Codes, thereby allowing full transparency, monitoring, and a formal process for identification and reaction to any relevant issues.

As outlined in Section 6 Research and Development of this report, and included in each edition of the AWP, the tools, methodologies, stakeholder engagement processes and IT solutions to address potential difficulties and risks to performance and to improve our way of working.

Additionally, ENTSOG will continue to internally evaluate the risks that present challenges to meet its objectives, activities and deliverables, addressing regulatory, legal, finance and human resource aspects. Risk assessment and plans for proper mitigation measures will continue to be supervised by ENTSOG's steering bodies. ENTSOG aims to minimise unnecessary costs to the Association that would be incurred through additional risk assessment undertaken by external consultants.

The table below outlines the key mitigation measures implemented by ENTSOG to address the potential risks identifies.

Category	Risk	Mitigation
Regulatory/legal	Possible inadequacy between the regulatory framework in place and the ENTSOG's objectives, tasks and deliverable	 ENTSOG, as AISBL, works under Belgian law. The legal team of ENTSOG is composed of a Belgian lawyer, and a strong network has been built with Belgian Notary and other Belgian Officials/authorities. Adherence to ENTSOG's Article of Association and related Rules of Procedures, following opinions issued by ACER and the Commission. Oversight by ACER of ENTSOG's regulatory tasks, as outlined by Regulation (EC) No. 715/2009 Constant legal monitoring to review, application and implementation of any additional/new pieces of legislation to which ENTSOG may be subject
Finance/ budgeting	Underestimated budget in place to achieve ENTSOG's objectives, tasks, deliverables	 ✓ Finances evaluated frequently by ENTSOG Finance committee, comprising ENTSOG members. The Finance committee meets five times per year. ✓ The status of finance evaluation reported, on quarterly basis, to Members to ensure a constant monitoring ✓ External publication of a detailed Financial Statement in ENTSOG Annual Report, which includes comparison of the assets, liabilities and equities, and income sources with the previous year. Any potential negative risk is being evaluated and addressed based on the trends presented. ✓ Yearly submission of Financial Statements to National Belgium Bank in accordance with Belgian accounting rules.
Resource allocation	Inadequate resource allocation to achieve ENTSOG's objectives, tasks, deliverables	 ✓ Secondment principal applied – personnel coming from TSOs ✓ Systematic planning in advance of personnel replacement ✓ Internal processes to ensure knowledge transfer within the Business Areas ✓ Annual outlook and analysis of recruitment needs prepared and addressed to Members on bi-annual basis
IT/cyber security	Inadequate IT resources/ systems in place to achieve ENTSOG's objec- tives, tasks, deliverables	 ▲ Frequent planning for replacement/upgrade of ENTSOG IT resources and infrastructure to deliver secure, integrated, and cost-effective IT solutions ▲ Anti-malware and cyberattack protection training campaigns rolled out to ENTSOG Brussels team on a regular basis ▲ Update of hardware and software to ensure IT security ▲ Audit of infrastructure and policies put in place ▲ Constant monitoring of traffic activities for email and SharePoint ▲ Knowledge transfer between personnel for back up in case of absences



8 ANNEX: OVERVIEW OF ENTSOG's **REGULATORY FRAMEWORK FOR ITS TASKS**

The tasks entrusted to ENTSOG derive mainly from the following pieces legislations:

Regulation (EC) No. 715/2009 of 13 July 2009 on conditions for access to the natural gas transmission networks and repealing Regulation (EC) No 1775/2005 (so-called Gas Regulation)

- ✓ Definition of the tasks of ENTSOG (Art. 8)
 - elaboration of network codes (NCs);
 - adoption of:
 - I. common network operation tools (CNOTs);
 - II. a non-binding Community-wide ten-year network development plan;
 - III. recommendations relating to the coordination of technical cooperation between Community and third country TSOs:
 - IV. an annual work programme;
 - V. an annual report;
 - VI. annual summer and winter supply outlooks.
- ✓ obligation of monitoring and analysing the implementation of NCs and the Guidelines adopted by the Commission and their effect on the harmonisation of applicable rules aimed at facilitating market integration.
- ✓ views to the Commission on the adoption of the Guidelines, upon request of the latter insti-
- ▲ ENTSOG shall make available all information. required by ACER to fulfil its tasks.
- ▲ All TSOs shall cooperate at Community level through ENTSOG in order to promote the completion and functioning of the internal market in natural gas and cross-border trade and to ensure the optimal management, coordinated operation and sound technical evolution of the natural gas transmission network (Art. 4);
- ▲ TSOs shall establish regional cooperation within the ENTSOG to contribute to the accomplishment of some of its tasks (Art. 12);

Regulation (EU) No. 1227/2011 of 25 October 2011 on wholesale energy market integrity and transparency (so-called REMIT)

- market participants, or a person or authority on their behalf (as ENTSOG), shall provide ACER with a record of wholesale energy market transactions, including orders to trade (Art. 8);
- cooperation at Union level foreseen (Art. 16);

Commission Implementing Regulation (EU) No. 1348/2014 of 17 December 2014 on data reporting implementing Article 8(2) and Article 8(6) of Regulation (EU) No. 1227/2011 (so-called REMIT **Implementing Act)**

- ✓ For reducing the burden of reporting on market participants and to make best use of existing data sources, reporting should involve where possible ENTSOG (Recital 8);
- the obligation for reporting should be phased in, starting with transmitting fundamental data available on the transparency platforms of ENTSOG (Recital 11);
- ▲ ENTSOG shall, on behalf of market participants, report information to ACER in relation to the capacity and use of facilities for transmission of natural gas including planned and unplanned unavailability of these facilities, through the Union-wide central platform (commonly known as ENTSOG TP) (Art. 9);
- ENTSOG is obliged to make the said information available to ACER as soon as it becomes available on its TP (Art. 9).

⁸ This non-exhaustive list is only listing the pieces of legislation in force at the time of drafting this report. ENTSOG expects, however, to be subject to additional/new pieces of legislation in 2024, upon final adoption by the EU Legislator of, notably: the so-called Hydrogen and Decarbonised Gas Package - amending/replacing the gas Directive and Regulation - the so-called "gas storage regulation", etc.

Commission Regulation (EU) No. 703/2015 of 30 April 2015 establishing a network code on interoperability and data exchange rules (the INT NC)

- ▲ ENTSOG should monitor and analyse the implementation of this Reg. and report its findings to ACER for allowing the institution to fulfil its tasks (Recital 10);
- TSOs shall communicate to ENTSOG the mandatory terms of interconnection agreements or any amendments thereof concluded after the entry into force of this Reg. within 10 days after their conclusion or amendment (Art. 4);
- by 30 June 2015, ENTSOG shall develop and publish a draft interconnection agreement template covering the default terms and conditions set out in the Reg. (Art. 5);
- ▲ taking into account the opinion provided by ACER, ENTSOG shall publish on its website the final template by 31 December 2015 (Art. 5);
- ENTSOG shall publish on its TP a link to the websites of the TSOs with reference to the Wobbe-index and gross calorific value for gas directly entering their transmission networks for each interconnection point (Art. 16);
- ENTSOG shall publish every two years a longterm gas quality monitoring outlook for transmission systems (aligned with the TYNDP) in order to identify the potential trends of gas quality parameters and respective potential variability within the next 10 years (Art. 18);
- ✓ For each data exchange requirement, ENTSOG shall develop a CNOT and publish it on its website (Art. 24);
- ▲ ENTSOG shall establish a transparent process for the development of all CNOTs (Art. 24);
- ✓ Where a potential need to change the common data exchange solution is identified, ENTSOG on its own initiative or on the request of ACER, should evaluate relevant technical solutions and produce a cost-benefit analysis of the potential change(s)(Art. 21);
- by 30 September 2016 at the latest, ENTSOG had to monitor and analyse how TSOs have implemented Chapters II to V of this Reg. TSOs were obliged to send the relevant information before 31 July 2016 (Art. 25).

Regulation (EU) 2022/869 of the European Parliament and of the council of 30 May 2022 on Guidelines for Trans-European Energy Infrastructure, amending Regulations No. (EC) 715/2009, (EU) 2019/942 and (EU) 2019/943 and Directives 2009/73/EC and (EU) 2019/944, And Repealing Regulation (EU) No. 347/2013 (so-called TEN-E Regulation)

- ✓ Involvement of ENTSOG for the establishment of a harmonised energy system-wide cost-benefit analysis
- Involvement of ENTSOG for the publication of framework guidelines for the joint scenarios (for the TYNDPs) to be developed together with ENTSO-E
- ✓ Publication, together with ENTSO-E of infrastructure gaps reports

Regulation (EU) 2017/1938 of 25 October 2017 of the European Parliament and of the Council concerning measures to safeguard the security of gas supply and repealing Regulation (EU) No 994/2010 (the "SOS Regulation" 9)

- Obligation for ENTSOG to perform an EU-wide gas supply and infrastructure disruption simulation in order to provide a high-level overview of the major supply risks for the EU
- ✓ Participation in the Gas Coordination Group
- Obligations for the TSOs, in the event of a regional or Union emergency, to cooperate and exchange information using the ReCo System for Gas established by ENTSOG.

⁹ As amended by Regulation (EU) 2022/1032 of the European Parliament and the Council of 29th June 2022 amending Regulations (EU) 2017/1938 and (EC) No 715/2009 with regard to gas storage.

Commission Regulation (EU) 2017/459 of 16 March 2017 establishing a network code on capacity allocation mechanisms in gas transmission systems and repealing Regulation (EU) No 984/2013 (the CAM NC)

- ▲ ENTSOG is required to publish the auction calendar (by January of every calendar year for auctions taking place during the period of March until February of the following calendar year) (Art. 3);
- ▲ ENTSOG has facilitated the establishment of joint booking platforms (Art. 37).
- ▲ ENTSOG is involved in a process by which terms and conditions of TSOs across the Union for bundled capacity products should be assessed and aligned to the extent possible, with a view to creating a common template of terms and conditions (Recital 10);
- ✓ within nine months from the entry into force of this Regulation ENTSOG shall, after consulting stakeholders, review and create a catalogue of the applicable main terms and conditions of the transport contract(s) of the TSOs in relation to bundled capacity products (Art. 20);
- in particular, ENTSOG shall analyse existing transport contracts, identifying and categorising differences concerning the main terms and conditions and the reasons for such differences and publish its findings in a report (Art. 20);
- ✓ on the basis of the said report, ENTSOG shall develop and publish a template for the main terms and conditions, covering contractual provisions which are not affected by fundamental differences in principles of national law or jurisprudence, for the offer of bundled capacity products (Art. 20);
- no later than three months after receiving the ACER's opinion, ENTSOG shall publish on its website the final template for the main terms and conditions (Art. 20);
- ENTSOG shall finalise at the latest by 1 October 2017, after consulting stakeholders and ACER, a conversion model for existing transport contracts in case of network users holding mismatched unbundled capacity at one side of an interconnection point. This because a freeof-charge capacity conversion service shall be offered by TSOs as from 1 January 2018 (Art. 21);

- ENTSOG shall coordinate and assist the completion of the demand assessment reports including by providing a standard template and publishing the reports on ENTSOG's website (Art. 26);
- in order to assist ACER in its implementation monitoring, ENTSOG shall monitor and analyse how TSOs have implemented the new version of CAM in accordance with Article 8(8) and (9) of Regulation (EC) No.715/2009. In particular, ENTSOG shall ensure the completeness and correctness of all relevant information from TSOs. ENTSOG shall submit to ACER that information by 31 March 2019 (Art. 38).
- ENTSOG shall monitor and analyse effects of network codes and the Guidelines on the harmonisation of applicable rules aimed at facilitating market integration (Regulation (EC) No 715/2019 Art. 8(8))

Commission Regulation (EU) 2017/460 of 17 March 2017 establishing a network code on harmonised transmission tariff structures for gas (the TAR NC)

- in order to assist ACER in its implementation monitoring, ENTSOG shall monitor and analyse in accordance with Article 8(8) and (9) of Regulation (EC) No. 715/2009 how transmission system operators have implemented the TAR NC. In particular, ENTSOG shall ensure the completeness and correctness of all relevant information provided by transmission system operators. ENTSOG shall submit to ACER that information in accordance with deadlines set out in the TAR NC (Art. 36);
- provide feedback on the template that ACER shall develop for the consultation document (Art. 26).



9 ABBREVIATIONS

	Definition		Definition
ACER	Agency for the Cooperation	GQ	Gas Quality
	of Energy Regulators	GQO	Gas Quality Outlook
API	Application Programming Interface	GQS	Gas Quality Study
AWP	Annual Work Programme	GRIP	Gas Regional Investment Plan
BAL NC	Network Code on Gas	IA	Interconnection Agreement
BRS	Balancing Business Requirements Specifications	IMR	Implementation Monitoring Report
CAM NC	Network Code on Capacity Allocation Mechanisms	INT NC	Network Code on Interoperability and Data Exchange Rules
CBA	Cost-Benefit Analysis	IP	Interconnection Point
CEN	European Committee for	IPP	Innovative Projects Platform
	Standardisation	KG	Kernel Group
CMP GL	Congestion Management Procedures Guidelines	LAG	Legal Advisory Group
CNOT	Common Network	MS	Member States
ONOT	Operations Tools	NC IMG	Network Code
DSO	Distribution System Operator		Implementation and Monitoring Group
EASEE-gas	European Association for the Streamlining of Energy	PCI	Projects of Common Interest
	Exchange – gas	PDWS	Professional Data
EC	European Commission		Warehouse System
ECP	External Contact Platform	RDI	Research, Development, and Innovation
EIC	Energy Identification Code	ReCo	Regional Cooperation
ENTSO-E	European Network of Transmission System Operators for Electricity	REMIT	Regulation on Energy Market Integrity and Transparency
ENTSOG	European Network of	SFGas	Sector Forum Gas
	Transmission System Operators for Gas	SoS	Security of Supply
ESI	Energy System Integration	TP	Transparency Platform
ETR	Energy Transition Related	TF	Task Force
EU	European Union	TAR NC	Network Code on
GCG	Gas Coordination Group	.,	Harmonised Transmission Tariff Structures for Gas
GERG	European Gas Research Group	TSO	Transmission System Operator
GIE GIS	Gas Infrastructure Europe Geographic Information	TYNDP	Ten-Year Network Development Plan
	System	WG	Working Group

ADDITIONAL **NOTE**

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