

Public consultation - energy security fitness check

Fields marked with * are mandatory.

1

Introduction

The EU has a comprehensive energy security framework, with the Gas Security of Supply Regulation (EU) 2017/1938 and Electricity Risk Preparedness Regulation (EU) 2019/941 as key pillars. Since their adoption in 2017 and 2019 respectively, sufficient time has passed **to perform an evaluation (fitness check)** to identify synergies within the framework and structurally internalise lessons learned from the COVID-19 and energy crises, as well as to prepare for the changing landscape due to the energy transition and Europe's phase out of Russian energy imports' dependency.

The objective of this evaluation is to evaluate the functioning of the energy security regulations, against 5 criteria:

- **Effectiveness** (how successful were the regulations in achieving its objective of ensuring preparedness, security of supply and resilience of the EU's energy system?)
- **Efficiency** (how efficient were the regulations, e.g. in terms of financial and human resources used for the changes generated by the previously mentioned regulations?)
- **Relevance** (how have the scope and objectives of the regulations remained relevant in addressing the past and current problems across the implementation period from 2017 and 2019 until now? Are they relevant in addressing future needs and problems?)
- **Coherence** (how well did the regulations work with other policy interventions and how well did specific measures in the regulations work together?)
- **EU Added Value** (to what extent did the regulations better reach the objectives, compared to what could have been reasonably expected from regional, national or local actions?)

Through this evaluation, the Commission aims at **assessing the performance of the EU's energy security framework during the energy crisis and during the energy transition**, and identify possible deficiencies, as well as synergies and efficiency gains. This could benefit the ongoing sectoral integration, as well as reduce administrative burden. The assessment

will also look at how the cooperation with neighbours worked, in particular with Energy Community contracting parties.

Besides evaluating how the EU's energy security framework functioned in the past, this questionnaire **looks at the future** by considering the dynamic changes ongoing in the EU's energy landscape, such as new challenges brought by diversification of gas suppliers to non-Russian suppliers, decarbonisation, climate change adaptation and electrification.

This public consultation is structured in **two main sections**: one section with **general questions on energy security** for all respondents, and a **second section with more specific and technical questions**. The section with specific questions is divided into three subsections: (1) on the whole energy security framework, (2) on security of gas supply, and (3) on security of electricity supply. Respondents may choose to answer those subsections of the questionnaire that are of interest to them.

2 About you

* 1 Language of my contribution

- Bulgarian
- Croatian
- Czech
- Danish
- Dutch
- English
- Estonian
- Finnish
- French
- German
- Greek
- Hungarian
- Irish
- Italian
- Latvian
- Lithuanian
- Maltese
- Polish
- Portuguese
- Romanian

- Slovak
- Slovenian
- Spanish
- Swedish

* 2 I am giving my contribution as

- Academic/research institution
- Business association
- Company/business
- Consumer organisation
- EU citizen
- Environmental organisation
- Non-EU citizen
- Non-governmental organisation (NGO)
- Public authority
- Trade union
- Other

* 3 First name

Angelo

* 4 Surname

Gagliani

* 5 Email (this won't be published)

angelogagliani@gmail.com

* 9 Organisation name

255 character(s) maximum

Emergenzacliamtica.it

* 10 Organisation size

- Micro (1 to 9 employees)
- Small (10 to 49 employees)
- Medium (50 to 249 employees)

- Large (250 or more)

11 Transparency register number

Check if your organisation is on the transparency register. It's a voluntary database for organisations seeking to influence EU decision-making.

185226239147-02

* 12 Are you active in the energy sector?

- Yes
- No

* 15 What is your segment of activity?

- Public authority
- Regulator
- Producer
- TSO
- DSO
- RCC
- Trader
- Shipper
- Retailer
- Aggregator
- Storage operator
- Energy exchange
- Other

* 16 Please specify which other segment of activity:

Environmental organization

* 17 Country of origin

Please add your country of origin, or that of your organisation.

This list does not represent the official position of the European institutions with regard to the legal status or policy of the entities mentioned. It is a harmonisation of often divergent lists and practices.

- Afghanistan
- Djibouti
- Libya
- Saint Martin
- Åland Islands
- Dominica
- Liechtenstein
- Saint Pierre and Miquelon

- Albania
- Algeria
- American Samoa
- Andorra
- Angola
- Anguilla
- Antarctica
- Antigua and Barbuda
- Argentina
- Armenia
- Aruba
- Australia
- Austria
- Azerbaijan
- Bahamas
- Bahrain
- Bangladesh
- Barbados
- Belarus
- Belgium
- Belize
- Benin
- Bermuda
- Bhutan
- Bolivia
- Dominican Republic
- Ecuador
- Egypt
- El Salvador
- Equatorial Guinea
- Eritrea
- Estonia
- Eswatini
- Ethiopia
- Falkland Islands
- Faroe Islands
- Fiji
- Finland
- France
- French Guiana
- French Polynesia
- French Southern and Antarctic Lands
- Gabon
- Georgia
- Germany
- Ghana
- Gibraltar
- Greece
- Greenland
- Grenada
- Lithuania
- Luxembourg
- Macau
- Madagascar
- Malawi
- Malaysia
- Maldives
- Mali
- Malta
- Marshall Islands
- Martinique
- Mauritania
- Mauritius
- Mayotte
- Mexico
- Micronesia
- Moldova
- Monaco
- Mongolia
- Montenegro
- Montserrat
- Morocco
- Mozambique
- Myanmar/Burma
- Namibia
- Saint Vincent and the Grenadines
- Samoa
- San Marino
- São Tomé and Príncipe
- Saudi Arabia
- Senegal
- Serbia
- Seychelles
- Sierra Leone
- Singapore
- Sint Maarten
- Slovakia
- Slovenia
- Solomon Islands
- Somalia
- South Africa
- South Georgia and the South Sandwich Islands
- South Korea
- South Sudan
- Spain
- Sri Lanka
- Sudan
- Suriname
- Svalbard and Jan Mayen
- Sweden

- Bonaire Saint Eustatius and Saba
- Bosnia and Herzegovina
- Botswana
- Bouvet Island
- Brazil
- British Indian Ocean Territory
- British Virgin Islands
- Brunei
- Bulgaria
- Burkina Faso
- Burundi
- Cambodia
- Cameroon
- Canada
- Cape Verde
- Cayman Islands
- Central African Republic
- Chad
- Chile
- China
- Christmas Island
- Clipperton
- Guadeloupe
- Guam
- Guatemala
- Guernsey
- Guinea
- Guinea-Bissau
- Guyana
- Haiti
- Heard Island and McDonald Islands
- Honduras
- Hong Kong
- Hungary
- Iceland
- India
- Indonesia
- Iran
- Iraq
- Ireland
- Isle of Man
- Israel
- Italy
- Jamaica
- Nauru
- Nepal
- Netherlands
- New Caledonia
- New Zealand
- Nicaragua
- Niger
- Nigeria
- Niue
- Norfolk Island
- Northern Mariana Islands
- North Korea
- North Macedonia
- Norway
- Oman
- Pakistan
- Palau
- Palestine
- Panama
- Papua New Guinea
- Paraguay
- Peru
- Switzerland
- Syria
- Taiwan
- Tajikistan
- Tanzania
- Thailand
- The Gambia
- Timor-Leste
- Togo
- Tokelau
- Tonga
- Trinidad and Tobago
- Tunisia
- Türkiye
- Turkmenistan
- Turks and Caicos Islands
- Tuvalu
- Uganda
- Ukraine
- United Arab Emirates
- United Kingdom
- United States

- Cocos (Keeling) Islands
- Colombia
- Comoros
- Congo
- Cook Islands
- Costa Rica
- Côte d'Ivoire
- Croatia
- Cuba
- Curaçao
- Cyprus
- Czechia
- Democratic Republic of the Congo
- Denmark
- Japan
- Jersey
- Jordan
- Kazakhstan
- Kenya
- Kiribati
- Kosovo
- Kuwait
- Kyrgyzstan
- Laos
- Latvia
- Lebanon
- Lesotho
- Liberia
- Philippines
- Pitcairn Islands
- Poland
- Portugal
- Puerto Rico
- Qatar
- Réunion
- Romania
- Russia
- Rwanda
- Saint Barthélemy
- Saint Helena, Ascension and Tristan da Cunha
- Saint Kitts and Nevis
- Saint Lucia
- United States Minor Outlying Islands
- Uruguay
- US Virgin Islands
- Uzbekistan
- Vanuatu
- Vatican City
- Venezuela
- Vietnam
- Wallis and Futuna
- Western Sahara
- Yemen
- Zambia
- Zimbabwe

18 This public consultation is structured in four sections. Apart from the section containing general energy security questions (for all respondents), which other sections do you wish to answer (if any)?

- Specific questions on the energy security framework
- Specific questions on Gas Security of Supply
- Specific questions on Electricity Security of Supply

The Commission will publish all contributions to this public consultation. You can choose whether you would prefer to have your details published or to remain anonymous when your contribution is published. **For the purpose of transparency, the type of respondent (for example, 'business association', 'consumer association', 'EU citizen') country of origin, organisation name and size, and its transparency register number, are always published. Your e-mail address will never be published.** Opt in to select the privacy option that best suits you. Privacy options default based on the type of respondent selected

*20 Contribution publication privacy settings

The Commission will publish the responses to this public consultation. You can choose whether you would like your details to be made public or to remain anonymous.

Anonymous

Only organisation details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and your contribution will be published as received. Your name will not be published. Please do not include any personal data in the contribution itself if you want to remain anonymous.

Public

Organisation details and respondent details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and your contribution will be published. Your name will also be published.

I agree with the [personal data protection provisions](#)

3 General questions on energy security

Energy security is the ability of an economy to ensure the balance between energy supply and energy needs across different timeframes and the ability of the system to **react to sudden shocks** (resilience) supported by the underlying energy infrastructure. Energy security also has a strong **international dimension**, given that the EU depends on energy imports from third countries.

While the fundamentals are well-functioning and well-interconnected energy markets and energy efficiency efforts, the EU has also developed a **robust energy security framework** relying on: oil emergency stocks, gas security of supply and storage, electricity risk-preparedness, offshore safety, critical infrastructure protection, and cybersecurity.

The energy crisis caused by Russia's unprovoked and unjustified military invasion of Ukraine has shown how external energy dependencies of the EU can be weaponized. It was a stark reminder of how **energy security is a key building block of a resilient, future-proof and competitive economy**.

Besides, decarbonisation and electrification will bring new energy security challenges. Increasing energy system integration increases the risk of cascading **cross-sectoral** failures, in particular between gas and electricity sectors. In 2023, natural gas notably accounted for around 15 % of EU electricity generation, while in the future substantial volumes of electricity

will be required for the production of hydrogen through electrolysis.

This section aims at collecting feedback regarding the functioning of the current EU energy security framework, and its possible future evolution.

21 How would you grade the functioning of the current EU energy security framework?

22 Please elaborate your choice:

The EU politics on replacing methane delivery by pipeline with LNG is a failure and will enforce the interests of oil and gas companies, will strengthen the risk of speculations on the gas price, and since LNG is more expensive than methane, it risks to increase gas prices for all the citizens. And LNG is not a solution: it's more environmentally harmful and will not contribute to the reduction of CO2 emission target for 2035 and even less for the 2050 zero emission targets

*23 Which of the following objectives do you consider the most important for the EU energy security architecture?

between 1 and 5 choices

- Investments in domestic decarbonised energy system
- Diversification of energy sources, suppliers and routes
- Physical protection of critical energy infrastructures against man-made attacks
- Enhancement of interconnections and smartening of infrastructure between Member States
- Energy demand response and reduction
- Allocating the costs of energy security fairly
- Preparedness (assessment of risks and formalisation of emergency plans)
- Making the most of existing infrastructure
- Resilience of energy infrastructure, e.g. to climate change
- Phase-out of Russian fossil fuel supply
- Cybersecurity
- Securing energy-related supply chains
- Strengthen the use of energy storage (electricity, gas, liquid fuels, heat) for energy security

24 Please elaborate your choice:

The major objective for the EU energy security architecture should be to promote the self production and a prosumer based system of energy production: this would be the best energy security system: distributing more than possible consumption and production.

- * 25 How do you think electrification has already impacted and can further impact EU energy security in the medium term? Was the EU energy security framework sufficient to address such impacts and if not, what improvements you think are needed?

Electrification should be improved with extra loans and no lobbying should be permitted on electrification UE directives, like in the automotive sector. But electricity should be produced from renewable systems, not from gas.

- * 26 Are there energy security risks associated with possible future electricity imports from third countries?

- Yes
 No
 No opinion

27

To what extent are there energy security risks associated with possible future electricity imports from third countries?

Many new electricity pipelines arrives from countries like Israel, Egypt, that are not reliable countries.

- * 28 Are there improvements to the EU energy security framework that are needed to prepare for the ongoing transition (towards e.g., more electrified, renewable-based and integrated EU energy system)?

- Yes
 No
 No opinion

- * 29 Can you please elaborate?

No GNL, out of fossil, more prosumer capacity

*30

What role can decarbonised and renewable hydrogen, including in the form of liquid fuels, play for future EU energy security?

An important role if it's green hydrogen and produced in place with green hydrogen valleys and not imported via new methane pipelines from Africa or TAP

*31 What are the potential risks to hydrogen supply security and to what extent should they be mitigated? How do you see the role of hydrogen imports in the future? Should the EU energy security framework play a role?

Yes, EU energy security framework should avoid the importing of hydrogen through methane pipelines and incentivize green hydrogen valleys inside the EU countries

*32 Do you think that the current EU energy security framework has sufficiently taken into account climate risks, such as energy disruptions due to heat and drought or damage to energy infrastructure due to extreme weather events?

- Yes
- No
- No opinion

*34 Liquefied Natural Gas (LNG) has become an increasingly important gas supply source (represents now ca. 50% of EU imports). Do you see any risks associated with the increased reliance on the global LNG market?

- Yes
- No
- No opinion

35 Which concrete risks do you see (e.g., reliance on unstable democratic countries, exposure to global markets fluctuations, infrastructure bottlenecks or oversize, etc.)? How should they be addressed?

The EU politics on replacing methane delivery by pipeline with LNG is a failure and will enforce the interests of oil and gas companies, will strengthen the risk of speculations on the gas price, and since LNG is more expensive than methane, it risks to increase gas prices for all the citizens. And LNG is not a solution: it's more environmentally harmful and will not contribute to the reduction of CO2 emission target for 2035 and even less for the 2050 zero emission targets

* 36 Are there specific energy security measures in other countries (US, China, Japan, Canada, Switzerland, UK, etc.) that you would like to see mirrored in the EU's framework?

- Yes
- No
- No opinion

* 38 Would you see enhancing international cooperation with close partners as beneficial for EU energy security?

- Yes
- No
- No opinion

39 Please elaborate, if appropriate:

Many new partners are not reliable countries, like in the Italian "Piano Mattei" politics.

* 40 What is the additional value for EU energy security resulting from EU legislation, compared to what could reasonably have been achieved (in terms of effectiveness and efficiency) by Member States acting at national level?

Italy, Germany and Spain based all their energy security on LNG and this is a very dangerous choice since these suppliers are not reliable and LNG is not environmentally sustainable and subject to market speculations.

* 41 Has the EU level action and coordination become more important or less important for energy security due to recent developments, e.g. due to the rising importance of LNG, the enhanced cross-border infrastructure and the joint phase out of Russian gas, or other?

- More important
- Equally important
- Less important
- No opinion

42 Please elaborate:

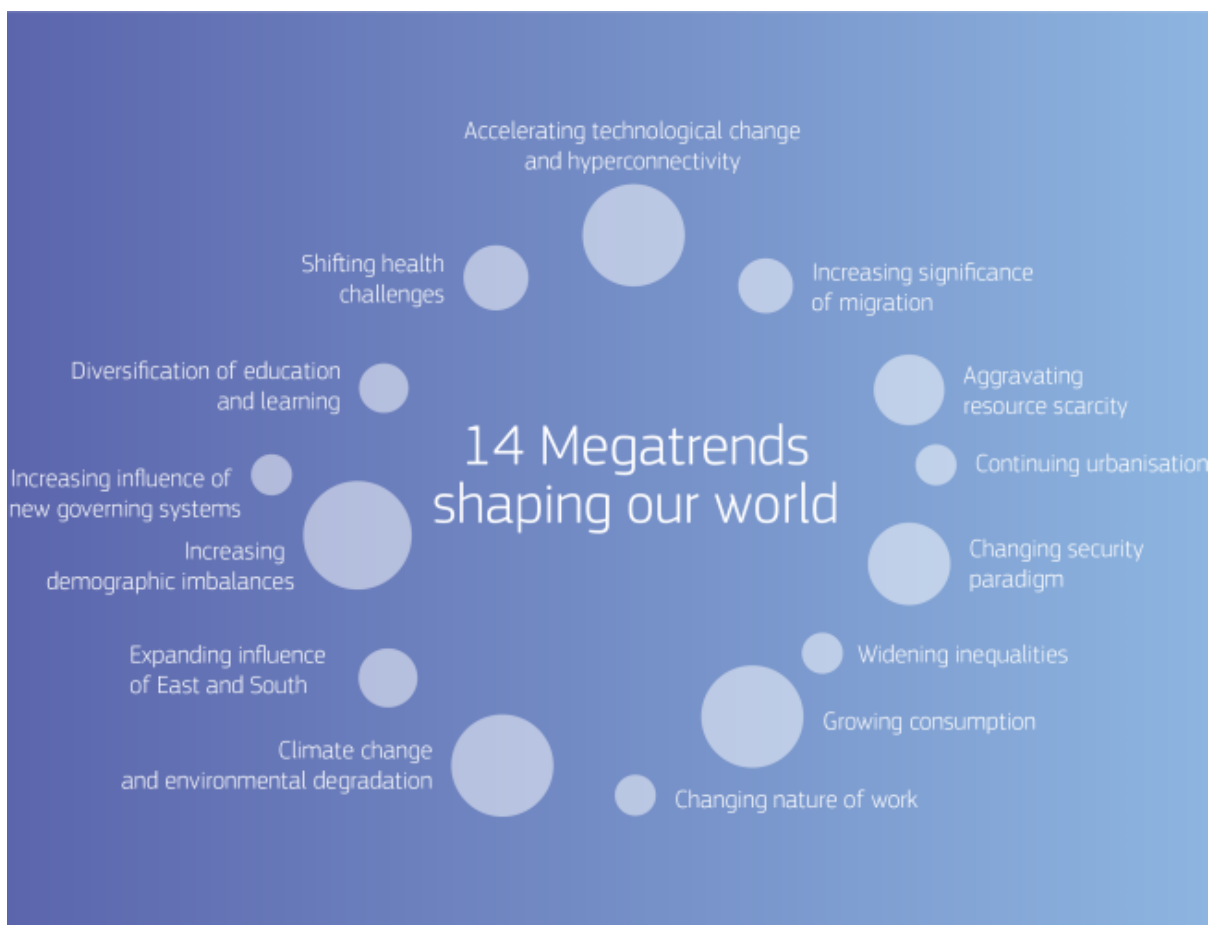
The rising importance of LNG is an environmental problem and justifies new cross-border pipelines, while EU has to reach the reduction target for 2035 and net zero for 2050.

* 43 Has the EU's energy security policy tackled the needs of EU citizens and/or businesses (e.g., in terms of energy availability, affordability, etc)? Will it continue to be relevant for them in the next decade?

EU's energy security policy introduced the LNG and regassification systems like FSRU all over Europe and caused the gas prices to speculatively rise over 10 times in the last year. We cannot depend on LNG and market speculation in the next years.

* 44 The European Commission's Joint Research Centre identified [14 megatrends](#) (see figure below), which are long-term driving forces that are most likely to have a global impact in the future. For which one(s) of these megatrends do you think the EU Energy Security architecture is the least prepared and why? Please explain.

Climate change is even more less important for EU Commission.



45 Do you have anything to add regarding the general functioning and/or the future orientation of EU energy security policy?

Please, encourage self-consumption of energy

46 Are there any papers, reports or other documents that you would like to upload?

Only files of the type pdf,txt,doc,docx,odt,rtf are allowed

4 Specific questions on energy security framework

47 To what extent do you agree with the following statements? "*EU-level action has...*"

	1 (Strongly disagree)	2 (Disagree)	3 (Neither agree, nor disagree)	4 (Agree)	5 (Strongly agree)
<i>... benefitted preparedness and security of supply in the energy sector"</i>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<i>... increased coordination and transparency between Member States"</i>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<i>... reduced distortions of the market and spill-over effects in neighbouring countries"</i>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

48 Are there any inconsistencies or gaps between the Gas Security of Supply and Storage Regulation and the Electricity Risk Preparedness Regulation that emerged in past years, and which hinder the achievement of the respective objectives of these Regulations?

- Yes
- No
- No opinion

49 How could the coherence between the previously mentioned Regulations be concretely improved in the future and the identified gaps filled?

750 character(s) maximum

LNG is not the solution. Community and citizen self production and consumption is the solution.

50 Are there strategies in place in your industry or country to mitigate the impact of an electricity crisis on gas supply, and vice versa?

- Yes
- No
- No opinion

51 Please elaborate on the strategies in place:

750 character(s) maximum

Renewable energy communities

52 Are the roles and responsibilities, as well as the mechanisms to coordinate between electricity and gas sectors, effective during crises?

- Yes
- No
- No opinion

53 Why are they not effective?

750 character(s) maximum

The gas sector only wants to achieve higher profits and survive to the new emission targets for 2035 and 2050 and will not make the interests of the citizens.

54 Electricity and gas markets have become increasingly intertwined. Do you see the following as potential areas where regulatory synergies could be sought?

	Yes	No	No opinion
Risk assessments and scenarios	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Preventive action/risk preparedness plans	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Definitions and levels of crises	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Crisis management procedures	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

Protected customers / Special protection against disconnection	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Storage measures for energy security (electricity, gases, liquid fuels, heat)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Regional cooperation	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Solidarity / Assistance	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

55 Please elaborate, if appropriate:

750 character(s) maximum

The gas sector and also the energy sector is in the hands of major and multinational companies who only want to achieve higher profits and survive to the new emission targets for 2035 and 2050 and will not make the interests of the citizens.

56 Are there other areas, not identified in the table above, where synergies should be sought?

750 character(s) maximum

Renewable energy communities

57 Do you see reasons and ways to bring the energy security frameworks for gas storage and wider energy storage closer?

- Yes
 No

58 Can you provide concrete examples?

750 character(s) maximum

Gas consumption for energy production has to stop with the emission reduction targets for 2035 and the net zero target 2050: why are you continuing to ask how they should enforce closeness and cooperation?

59 What are the most relevant cross-sectoral or cascading risks affecting gas and electricity that should be addressed in the future (e.g. shortage of critical gas volumes for power generation, power outages affecting turbines in the gas system or boilers, or power outages affecting production of renewable/low-carbon gases)?

750 character(s) maximum

Gas consumption for energy production has to stop with the emission reduction targets for 2035 and the net zero target 2050: why are you continuing to ask how they should enforce closeness and cooperation?

60 How could these risks be tackled in the future?

750 character(s) maximum

Out of fossil: investing on community and citizens self production of energy

61 To what extent are risks associated with the further digitalization and smartening of energy networks, i.e., cybersecurity risks, sufficiently covered in terms of ensuring security of supply? Do you see a need for improvements to the EU energy security framework to tackle these risks?

750 character(s) maximum

Out of fossils: digitalization could only soften the risks but emissions will not stop and we are at a turning point on climate change and the weather events will be even more catastrophic, as the frequency and the intensity of such events showed in the last years all over Europe

62 Do you see any additional or increasing role for demand-side measures in the future EU energy security architecture, on top of the already existing framework under the recently adopted Electricity Market Design?

- Yes
- No
- No opinion

63 Can you provide concrete examples that would allow to better recognize and leverage demand-side policies?

750 character(s) maximum

Renewable energy communities

64 Please explain:

750 character(s) maximum

Out of fossil: investing on community and citizens self production of energy

65 Are there any papers, reports or other documents on these issues that you would like to upload?

Only files of the type pdf,txt,doc,docx,odt,rtf are allowed

5 Specific question on Gas Security of Supply

Gas security of supply (SoS) is the ability of the gas system to guarantee the supply of gas to customers with a clearly established level of performance. At EU level, safeguards are introduced by the **Gas Security of Supply Regulation (EU) 2017/1938**, amended in 2022 by the Gas Storage Regulation and the Gas Package adopted in 2024. It relies on:

- Improved **information exchanges** and transparency via e.g. the **Gas Coordination Group**.
- EU-wide **simulations** and **risks assessments** conducted at European, regional and national levels.
- A framework for national **Preventive Action Plans** and **Emergency Plans**, to prevent and react to risks and crises.
- **Crisis management** procedures and **solidarity** safeguards in emergencies, in particular to “**protected customers**” (e.g. households).
- A policy to ensure a filling of gas **storage**.

The Commission published on 5 October 2023 a report reviewing the Regulation (COM(2023) 572). Following the most recent amendments, the Commission has to prepare a report on the implementation of the storage provisions and of the solidarity provisions of the Hydrogen & Decarbonised Gas Package by 28 February 2025. Besides informing the fitness check on the energy security framework, this public consultation intends to provide input also for that report.

A. Backward-looking

1) Effectiveness

66 Regulation (EU) 2017/1938 pursues several objectives. How would you grade its performance on the following objectives?

	1 (Very poor)	2 (Poor)	3 (Average)	4 (Good)	5 (Excellent)
Secure an adequate level of preparedness in Europe for gas supply disruptions, e.g. through assessing risks and sufficient infrastructure	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Ensure that all necessary measures are taken to					

safeguard an uninterrupted supply of gas, in particular to protected customers	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Enhance regional and EU-wide cooperation, including in times of supply emergencies	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

67 Have you experienced barriers or difficulties in implementing and enforcing the provisions of the Regulation?

- Yes
- No
- No opinion

68 Which provisions proved difficult to implement and why?

750 character(s) maximum

The energy security system can no more be supported on gas supply: the EU has to look forward and implement news politics based on gas reduction for 2035 and no more fossils for 2050, instead of improving "new gas assessments" and new gas policies based on fossil LNG

69 Have there been any unexpected and/or unintended effects caused by the implementation of this Regulation, which hindered progress towards these objectives?

- Yes
- No
- No opinion

70 Which effects were there and what parts of the Regulation caused these effects?

750 character(s) maximum

Gas prices market speculations in 2021 and following years with an increase of energy process for "protected customers" and households that ended up being never-before-seen extra profits for transportation and energy supply companies

71 To what extent do you agree that the following specific provisions have been effective in ensuring preparedness, security of supply and/or resilience?

	1 (Not effective at all)	2 (Marginally effective)	3 (Moderately effective)	4 (Effective)	5 (Very effective)

Gas Coordination Group	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Infrastructure standard and bi-directional capacities	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Supply standard and protected customers	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Common Risk Assessments	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
National Risk Assessments	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Preventive Action Plans and Emergency Plans	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Crisis management	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Crisis levels	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Solidarity provisions	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Information exchange requirements under Article 14	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Storage targets	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Annual storage trajectories set by the Commission	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Storage system operators' certification	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Demand reduction and EU-alert	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Cooperation with Energy Community Contracting Parties	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

72 Do you wish to elaborate on any of the points above? If so, please indicate to which point(s) you are referring to.

750 character(s) maximum

The Gas Coordination Group has perfectly been effective to increase the interests of the the gas and oil companies, shifting the cost of choices onto families and doubling profits

73 What do you consider the main strengths and weaknesses of the Storage Regulation, in particular the 90% storage targets, the trajectories, burden sharing, the certification procedure, the sunset clause in 2025 of the storage provisions?

750 character(s) maximum

The energy security system can no more be supported on gas supply: the EU has to look forward and implement news politics based on gas reduction for 2035 and no more fossils for 2050, instead of improving "new gas assessments" and new gas policies based on fossil LNG

2) Efficiency

74 What were the costs and benefits of the implementation of the Gas SoS Regulation (including the storage and solidarity amendments introduced by the Storage Regulation and the Hydrogen and Decarbonised Gas Package) for your organization? If possible, please provide both quantitative and qualitative elements.

750 character(s) maximum

The Gas Coordination Group has perfectly been effective to increase the interests of the the gas and oil companies, shifting the cost of choices onto families and doubling profits

75 To what extent have the following provisions created **disproportionate** burden (e.g. administrative, financial or other burden)?

	1 (Negligible)	2 (Low)	3 (Average)	4 (High)	5 (Very high)
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Gas Coordination Group	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Infrastructure standard and bi-directional capacities	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Supply standard and protected customers	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Common Risk Assessments	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
National Risk Assessments	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Preventive Action Plans and Emergency Plans	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Crisis management	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Crisis levels	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Solidarity provisions	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Information exchange requirements under Article 14	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Storage targets	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Annual storage trajectories set by the Commission	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Storage system operators' certification	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Demand reduction and EU-alert	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Cooperation with Energy Community Contracting Parties	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

76 Do you wish to elaborate on any of the points above? If so, please indicate to which point(s) you are referring to.

750 character(s) maximum

The Gas Coordination Group has perfectly been effective to increase the interests of the the gas and oil companies, shifting the cost of choices onto families and doubling profits

77 How can the Regulation's reporting and monitoring requirements be simplified? Have the current reporting and monitoring requirements or frequency avoided

unnecessary duplication or overlapping responsibilities (e.g. regarding risk assessments and plans)?

750 character(s) maximum

This Regulation has to Stop fossil fuels. No reporting or monitoring requirements, only for reduction of fossil fuels use.

3) Relevance

78 To what extent were the provisions of the Gas Security of Supply Regulation relevant in addressing the gas supply challenges and disruptions experienced by the EU since its implementation? Please elaborate your answer, e.g. by making explicit reference to the 2022/2023 energy crisis.

750 character(s) maximum

The energy security system can no more support gas supplies: the EU has to look forward and implement news politics based on gas reduction for 2035 and no more fossils for 2050, instead of improving "new gas assessments" and new gas policies based on fossil LNG

79 How well adapted is the Gas Security of Supply Regulation to technological or scientific progress, and to the environmental/climatic challenges that EU will face?

750 character(s) maximum

The energy security system can no more support gas supplies: the EU has to look forward and implement news politics based on gas reduction for 2035 and no more fossils for 2050, instead of improving "new gas assessments" and new gas policies based on fossil LNG

4) Coherence

80 To what extent is the Gas Security of Supply Regulation aligned with other EU policy goals?

750 character(s) maximum

The energy security system can no more support gas supplies: the EU has to look forward and implement news politics based on gas reduction for 2035 and no more fossils for 2050, instead of improving "new gas assessments" and new gas policies based on fossil LNG

81 Did some provisions within the Regulation prove to be inconsistent with one another?

- Yes
- No
- No opinion

82 Please give concrete examples:

750 character(s) maximum

The energy security system can no more support gas supplies: the EU has to look forward and implement news politics based on gas reduction for 2035 and no more fossils for 2050, instead of improving "new gas assessments" and new gas policies based on fossil LNG

5) EU added value

83 The 2016 Commission's proposal for the Gas Security of Supply Regulation argued that the necessity of EU action was based on the following:

- "The increasing interconnection of the EU gas markets and the 'corridor approach' for enabling the reverse flows on gas interconnectors call for coordinated measures";
- "Without such coordination, national security of supply measures are likely to adversely affect other Member States or the security of supply at EU level";
- "The risk of a major disruption of gas supplies to the EU is not restricted to national boundaries and could affect several Member States, whether directly or indirectly";
- "National approaches both result in sub-optimal measures and aggravate the impact of a crisis".

Did the events of past years (in particular the 2022/2023 energy crisis and the increased importance of LNG as alternative to Russian gas) confirm these statements in your view?

- Yes
- No
- No opinion

84 Can you please elaborate on why you think that these events confirmed those statements?

750 character(s) maximum

The energy security system can no more support gas supplies: the EU has to look forward and implement news politics based on gas reduction for 2035 and no more fossils for 2050, instead of improving "new gas assessments" and new gas policies based on fossil LNG. And also doubling the TAP capacity will not meet the targets.

85 Can you please elaborate on why you think that these events invalidated those statements?

750 character(s) maximum

The energy security system can no more support gas supplies: the EU has to look forward and implement news politics based on gas reduction for 2035 and no more fossils for 2050, instead of improving "new gas assessments" and new gas policies based on fossil LNG. And also doubling the TAP capacity will not meet the targets.

B. Forward-looking

86 According to the impact assessment on the [2040 targets](#), natural gas demand in the EU should decline from ca. 319 Mtoe today to 100-150 Mtoe in 2040, with an increase in biomethane production. The overall decreasing gas consumption may lead to a change in consumption pattern with likely different speeds of phase out across sectors. How should the Gas Security of Supply Regulation change to remain relevant, considering the foreseen evolution of the EU gas supply and demand?

750 character(s) maximum

Stop fossil fuels. Improve Renewable Energy Communities.

87 Are there objectives for gas security of supply that were not considered in 2017 and that a potential revision of the Regulation should aim to achieve?

- Yes
- No
- No opinion

88 Which blind spots in the current Regulation do you think should be addressed in a future update of the energy security framework?

750 character(s) maximum

Stop fossil fuels. Improve Renewable Energy Communities.

89 Some provisions expire in 2025, including the 90% storage target. What role do you think gas storage policies should play beyond 2025 in the short and long-term?

750 character(s) maximum

The energy security system can no more support gas supplies: the EU has to look forward and implement news politics based on gas reduction for 2035 and no more fossils for 2050, instead of improving "new gas assessments" and new gas policies based on fossil LNG.

90 Should a revision of the Regulation provide more transparency on long-term gas contracts e.g. via Article 14, in particular where a single third country supplier represents a significant share of the overall supply mix?

- Yes
- No
- No opinion

91 How should the Regulation provide more transparency?

750 character(s) maximum

Stop fossil fuels. The energy security system can no more support gas supplies: the EU has to look forward and implement news politics based on gas reduction for 2035 and no more fossils for 2050, instead of improving "new gas assessments" and new gas policies based on fossil LNG.

92 Why should the Regulation not focus on providing more transparency?

750 character(s) maximum

Stop energy systems based on gas and other fossil fules.

93 How should the costs of maintaining a high level of gas security of supply be distributed between various actors, such as companies, citizens and governments?

750 character(s) maximum

Citizens has not to pay for this self-killing policy based on emission and consumption of fossil fuels, like methane and worse LNG

C. Other

94 Do you have anything to add regarding the general functioning and/or the future evolution of the Gas Security of Supply Regulation?

Stop fossil fuels and invest in renewable energy communities.

Contact

ENER-SOS-REVISION@ec.europa.eu