BDEW-Antwort zur Konsultation "European Grids Package", 29.07.2025

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*** Pflichtfeld**

	Frage	Finale BDEW-Antwort
I.	**Secure supplies of clean and affordable energy** are critical for European competitiveness, preparedness, security and the EU's decarbonisation efforts towards 2030 and 2050. Ensuring a well-integrated and optimised European energy grid is crucial to accelerating a cost-efficient clean energy transition. The mission letter to Commissioner Jørgensen calls to work for the production of "more clean energy" and "the upgrade of the grid infrastructure". Specifically, it is requested to "look at the legal framework on European grids with the aim to help upgrade and expand grids to support rapid electrification [and] speed up permitting" and highlights the need to "upgrade our grid infrastructure and develop a resilient, interconnected and secure energy system".	
	Q1: To what extent do you agree that existing EU legal framework for grids delivers on the following objectives?	
	*Market integration	Slightly agree
	*Interconnections	Neutral
	*Competition / Affordability of energy prices	Neutral
	*Energy security	Neutral
	Please explain your reply providing, where possible, qualitative and quantitative evidence.	The timely development of grid infrastructure is critical for achieving the energy transition, yet several barriers impede progress. These include lengthy permitting, insufficient supply chains, lenghty grid planning processes due to high bureaucratic burden and insufficient financing. The Grids Package should also address relevant aspects of H_2 infrastructure which need to be addressed in a timely manner. BDEW supports the existing TYNDP processes but sees room for improvement with regards to stakeholder involvement and scenario variety (see remarks in text file).
	Q2: In your view, what are the main barriers to grid infrastructure development necessary for the energy transition to happen, and at sufficient pace? [rank them from 1 (most important) to 8 (least important)]	
	*Suboptimal transmission network planning	7
	*Suboptimal distribution network planning	5
	*Lengthy permitting	3
	*Insufficient financing	1
	*Insufficient supply chains	2
	*Inefficient use of existing infrastructure	6
	*Regulatory uncertainty	4
	Other (please specify below)	

II.	**EU Infrastructure planning** Requirements for planning of transmission network development on a national and European level are included in the internal market legislation (for electricity as well as hydrogen and decarbonised gases) and the TEN- E Regulation. They require the TSOs to put forward network development plans with at least a 10-year outlook for grid development biannually. At the European level, this is done through the Ten-year network development plan (TYNDP), currently developed by ENTSO-E and ENTSO-G.	
	*The following questions Q3 to Q6 apply to both electricity and hydrogen, please specify the sector you are referring to when answering these questions:	Both
	Q3: To what extent do you agree with the following statements?	
	*The current framework in relation to the TYNDP and national transmission development plans provides for integrated and coherent planning at national and EU level	Neutral
	*The TYNDP identifies all cross-border infrastructure needs	Slightly agree
	*The TYNDP identifies all relevant projects to match the actual infrastructure gaps	Neutral
	*The TYNDP should have a more top-down European approach to identify cross-border infrastructure needs, meaning going beyond a project bottom-up approach and ensuring that the planning aligns with EU and Member States' climate and energy objectives	Neutral
	*The TYNDP should have a more top-down European approach to better link identified needs and priority projects of European interest	Neutral
	*Projects at national level should align and support priorities of European interest	Slightly agree
		Existing TYNDP processes address some modular needs but require greater alignment with sector-coupled infrastructure, including hydrogen and CO_2 networks. For hydrogen, the coordination between EU member states is necessary to build up the hydrogen network and supply chain.
	***Q4: The needs identification at EU level should (you can choose more than one option):**	
	Cover cross-border projects within the EU	✓
	Cover internal reinforcements in Member States necessary for cross-border projects	✓
	Cover connections with third countries	✓
	Cover non-infrastructure solutions (e.g. grid enhancing technologies)	✓
	Follow a cross-sectoral approach	✓
	Other	✓
	If other, please specify:	
	Q5: Do you agree with the following statement?	
	*The frequency of the identification of system needs process (every 2-years) is fit for purpose.	Yes
	*If no, the frequency should be changed as follows:	

	Q6: Do you agree with the following statement?	
	*The frequency of the scenarios building process (every 2-years) is fit for purpose.	Yes
	*If no, the frequency should be changed as follows:	
	Please explain your reply providing, where possible, qualitative and quantitative evidence.	For all energy carriers, the frequency (every 2 years) is adequate due to the dynamic development which requires regular updates of the planning.
	Q7: Do you agree with the following statement?	
	*The governance framework of the TYNDP, i.e. the role of all individual involved, should be revised.	Yes
	*If yes, please explain:	Stakeholder involvement should be improved (see remarks in separate file, chapter 3.1)
	Q8: In your view, how can the needs for CO2 cross-border infrastructure in the EU be reflected in the PCI/PMI selection process under the TEN-E Regulation? Are there other ways the TEN-E Regulation could support the development of future CO2 cross border infrastructure?	
	Please explain:	
	Please explain your reply providing, where possible, qualitative and quantitative evidence.	It should be ensured that CO_2 networks are mapped and coordinated alongside electricity and hydrogen networks to provide efficiency gains whilst leverage synergies and reduce duplications.
III:	**Electricity network planning at national level** At a national level, transmission and distribution grid operators are obliged to establish respective network development plans (“NDP”) at least on a biannual basis, pursuant to requirements of Articles 51 and 32 of the Directive (EU) 2019/944. Plans should set out planned investment, taking into account future development of supply and demand, including renewables generation, flexibility and electric vehicles (EVs) recharging points.	
	Q9: Concerning the national transmission and distribution network development plans, do you agree with the following statements?	
	*The existing legal framework for transmission network development plans is fit for purpose	Yes
	*There is a sufficient alignment between national transmission development plans between Member States	Yes
	*There is a need for better alignment between national transmission and distribution network development plans across the EU	No

	Q10: Concerning the distribution network development plans, to what extent do you agree with the following statements?	
	*The existing legal framework for distribution network development plans is fit for purpose	Slightly agree
	*The coverage of small distribution system operators (DSOs) in the network planning is sufficient under the existing legal framework	Neutral
	*There is sufficient transparency of distribution network development plans	Slightly agree
	*The implementation of the distribution network development plans is sufficient and their objectives met	Slightly agree
	*Distribution grid operators are equipped with sufficient capacity to properly plan distribution grids	Slightly agree
	*There should be a stronger coordination of distribution network planning at EU level	Strongly disagree
	Other	As legal requirements for network development become increasingly detailed, the preparation of the network development plan demands greater resources. However, the DSO is currently burdened by a significant backlog of network connection requests. Consequently, the DSO lacks sufficient capacity to meet the obligation of updating the network development plan of details, particularly on a quarterly basis.
IV.	**Transparency on electricity grid hosting capacity** Article 31(3) of Directive 2019/944 (EU) requires that distribution grid operators provide system users with the information they need for efficient access to, and use of, the system, in particular on capacity available for new connections in their area of operation, information on connection requests as well as on how the available grid hosting capacity is calculated. The EU Action Plan for Grids further strives to enhance transparency by creating a common understanding on the grid hosting capacity calculation across Europe.	
	***Q11: Do you consider additional measures necessary to reduce grid connection lead times? Should there be differentiated approaches for different types of uses (industry decarbonisation, residential heat, charging infrastructure)?**	
		Yes
	*If yes, please explain your reply providing, where possible, qualitative and quantitative evidence.	Grid expansion has to remain the measure of first choice to overcome scarcety in grid connection capacities. In addition to this, it is important to develop solutions quickly to reduce waiting and processing times for connecting power generation or consumption facilities to the electricity grids. Rules on providing transparency on grid connection capacities have already been introduced with the 2024 review of the Electricity Market Directive: Article 31.3 obliges grid operators to publish information on available grid capacities and to update these information every three months. These rules may appear too weak from the grid users' point of view and too ambitioned from the grid operators' perspective. BDEW proposed to differentiate: In the case of connection requests for "simple" projects, grid operators should be obliged to provide information more quickly than after three months. By contrast, the possibilities to connect complex projects can only be evaluated after thorough investigation which can take more time than three months. Besides, grid operators must be protected from "floods" of information requests which are not based on serious project proposals, as observed in many grid areas. Reducing the number of such requests – for example, by imposing a small fee, possibly refundable if the project is implemented – will relieve the burden on the staff responsible and enable them to process the truly relevant applications more quickly.

V.	**Permitting** Directive (EU) 2023/2413 (Renewable Energy Directive – RED III), Directive (EU) 2024/1788 (Directive on Gas and Hydrogen Markets), Regulation (EU) 2022/869 (TEN-E Regulation), and Regulation (EU) 2024/1735 (Net-Zero Industry Act) establish provisions for the acceleration of permitting procedures for renewable energy generation, storage and energy networks including CO2 assets. Whilst some RED III provisions have yet to be transposed by Member States due to upcoming deadlines, permitting procedures are perceived as one of the main cause of delays in project implementation.	
	Q12: In order to accelerate permitting for energy networks, storage and renewables and CO2 assets, to what extent do you agree with the following statements?	
	*The permitting provisions of the TEN-E regulation are clear and easy to implement	Slightly disagree
	*Permitting procedures should be fully digitalised	Slightly agree
	*Availability and sharing environmental and geological data (and other technical data required) should be ensured	Slightly agree
	*One-stop shops for network permitting should be introduced	Slightly disagree
	Environmental assessments should be simplified and streamlined	Strongly agree
	*Legal deadlines for permitting procedures need to be shortened	Neutral
	*Deadlines for the permitting of networks should be shortened or established where missing	Slightly agree
	*Deadlines for the permitting of Projects of Common Interest and Project of Mutual Interest should be shortened and clarified to reflect the urgency in implementing these projects	Slightly agree
	The permitting procedures for storage should be simplified	Slightly agree
	The permitting procedures for distribution network projects and small-scale renewable projects, as well as repurposing, refurbishment and repowering should be simplified	Slightly agree
	*The permitting procedures for hybrid projects (combining different technologies, including storage) and other innovative solutions should be simplified	Slightly agree
	Other	The European Commission should prioritise the swift and uniform implementation of RED III provisions across Member States. New permitting at this point in time rules could disrupt ongoing implementation efforts at national level. Instead, to accelerate permitting without causing additional bureaucratic hurdles, the Commission should work closely with Member States to identify and address barriers hindering effective implementation. In addition to the obliged provisions on overriding public interest, renewables acceleration areas and new permitting deadlines, the European Commission should also urge Member States to adopt plans for dedicated infrastructure areas.
	On those marked with an asterisk (*),please specify:	

VI.	**Facilitating investments in grid infrastructure** Article 16 of the TEN-E Regulation facilitates investments with cross-border impact through a cross-border cost allocation (CBCA) framework where the relevant national regulatory authorities (NRAs) jointly agree on CBCA decision. Where there is no agreement among the NRAs, they may jointly request ACER to decide on the investment request including the CBCA.	
	Q13: To what extent do you agree with the following statements?	
	*The current cross-border cost allocation (CBCA) framework is fit for purpose	Slightly disagree
	*An investment request within the CBCA framework could also cover several projects ('bundling') to facilitate cost sharing amongst more Member States beneficiaries	Slightly agree
	*The CBCA framework should be developed further to facilitate that investment costs are shared amongst countries, beyond hosting Member States, in proportion to the expected benefits	Neutral
	The role of involved actors (Member States, NRAs, ACER, TSOs) should be revised to facilitate the process	Slightly agree
	Other:	
	On those marked with an asterisk (*), please specify:	The current CBCA framework for electricity grids can, in general, be considered as "fit for purpose". By contrast, with regards to hydrogen, the current CBCA framework fails to address the nascent nature of the yet to evolve European hydrogen market, and to adequately reflect the underlying high uncertainty and fast-paced dynamics. It is crucial to review the current CBCA framework considering the unique challenges of an early H2 market to allow for needed flexibility in order for CBCA to contribute effectively to the development of cross-border H2 infrastructure. At the same time, additional financing and de-risking schemes are needed to address prohibitive network tariffs and derisk cross-border infrastructure projects to facilitate a successful market development across Europe.
	Q14: To what extent other instruments or tools (beyond CBCA) should be considered or modified to facilitate financing of cross-border infrastructure?	
	*Inter-Transmission System Operator Compensation (ITC) mechanism	Slightly disagree
	*Sharing of congestion income	Neutral
	*Common/regional regulated asset base (RAB)	Neutral
	*Ex post conditionalities	Neutral

	Other:	FOR HYDROGEN: Existing financing schemes for cross border infrastructure such as CBCA do not address the issue of potentially prohibitive network tariffs linked to an initially limited number of network users during market ramp up. This could lead to lower capacity bookings, inhibit investment along the hydrogen value chain, and potentially even stalling market development. In order to facilitate a successful market development, this issue needs to be addressed by intertemporal cost allocation mechanisms in combination with appropriate guarantee schemes. In particular for cross-border infrastructure projects, it is crucial to develop mechanisms on a European level to allow for a level playing field between H2 transport corridors and drive the development of a European core network. Besides an European amortization account and intertemporal cost allocation mechanism, also guaranteed capacity bookings could aid derisking cross border projects. Additionally, increasing overall volume of CEF funding is seen crucial to provide necessary support to further develop integrated energy grids across the EU. On the other mechanisms proposed under this question, we feel that additional information on the design and functioning would be required to give an ultimate evaluation.
VII.	**Funding the necessary grid reinforcements and adaptations** will require mobilisation of significant financial resources. Grid operators, both at the transmission and distribution levels, are faced with an unprecedented increase in the volume of capital expenditure possibly affecting credit rating and access to capital.	
	Q15: In your view, which financial obstacles are most relevant for investments in infrastructure projects?	
	*Access to debt	Slightly agree
	*Access to equity	Strongly agree
	*Access to counter-guarantees	Slightly agree
	*Regulatory risk	Slightly agree
	*Access to public funding (EU/national)	Slightly agree
	Other:	

	Q16: If needed, what financial measures could be considered to further support transmission infrastructure?	
	Please specify.	
	Q17: If needed, what financial measures could be considered to further support distribution infrastructure? Please specify	
	Please specify.	There is urgent need to modernise Europe's electricity grid infrastructure also in the distribution networks. In order to meet the challenges of decentralisation as well as electrification of large parts of the energy sector, digitalisation especially of DSOs is key. DSOs play a crucial role for energy transition since they connect the majority of new electricity users (e.g. heat pumps, EV charging infrastructure) and renewable energy resources. Therefore increased EU funding for distribution grids, simplified access to financing for smaller DSOs, and improved public procurement rules are recommended. BDEW asks to extend the existing funding systems for PCIs and PMIs to DSOs. Apart from that, it has to be stated that network regulation is a national matter; therefore, the relevant competences should remain at the national level. National regulators shall have the necessary competences to set the best fitting regulatory framework in a given country to intentivise an efficient network infrastructure planning and the subsequent implementation of projects.
	Q18: If needed, what financial measures could be considered to further support hydrogen infrastructure? Please specify.	
	Please specify.	In order to support the development of H2 infrastructure, and in particular the realization of cross-border projects, instruments on corridor and European level are needed, such as an European amortization account and EU/corridor-specific intertemporal cost allocation mechanisms, together with complementary EU guarantees to derisk cross-border infrastructure and facilitate an EU-wide level playing field for infrastructure development.
	Q19: If needed, what financial measures could be considered to further support CO2 infrastructure? Please specify.	
	Please specify.	BDEW sees a need for revenue guarantee mechanisms (e.g. Regulated Asset Base, or a similar approach taken to the German H2 Network) at either EU or national level to incentivise operators to bring forward infrastructure development, especially in the market ramp-up phase. The Connecting Europe Facility budget should be increased in the coming years to facilitate the ramp up. Financial guarantees by e.g. the EIB could be also explored.

VIII.	**Supply chains** Constrained supply chains and a lack of skilled workforce are being cited the major hurdles hindering grid development. The 2023 Action Plan for Grids included concrete action to address the often fragmented technical requirements for grid components through a common specifications workstream, as well as the need for greater visibility on future investments planned. The Union of Skills package adopted on 5 March 2025 targets the identified gap in skills - particularly those needed for the energy transition, investing in people for competitiveness, reinforcing the Competitiveness Compass and the Clean Industrial Deal.	
	Q20: To what extent do you agree with the following statements?	
	*The current network development plans at EU and national level provide sufficient visibility for the supply chain for the purpose of investment planning	Slightly agree
	*There is a need for better visibility to ensure sufficient investment in the supply chains	Neutral
	*If slightly/strongly agree, please specify	
	Q21: To what extent do you agree with the following statements?	
	There is a need for further harmonisation of equipment requirements within the EU, for the purpose of scaling up supply chains and their repair capacities	Slightly agree
	Other:	For gas equipment, the requirements are already largely harmonized, as they must comply with specific European standards. Furthermore, there are also national safety requirements and other national specificities which need to be followed and can't be harmonized within Europe. In electricity, there could be a benefit from further harmonization of requirements in order to reduce the number of variants for different products.
	***Q22: Is there a need for additional EU action to address supply chain bottlenecks in the energy sector, following recent initiatives?**	
		Slightly agree
	***Q23: Is there a need for additional EU action in the field of skills for the energy sector, following recent initiatives, such as the Union of Skills?**	
		Slightly agree
IX.	**Digitalisation and resilience** Digitalised and resilient grids are essential from a security of supply perspective. Actions were put forward also as part of the Action Plan for Grids adopted in 2023. By the end of 2025, a common Technopedia Platform operated by the ENTSO-E and the EU DSO entity should materialize, providing an overview of existing grid enhancing technologies. Enhancing the security and resilience of cross-border energy infrastructure projects is crucial for ensuring a reliable supply of energy. It is also a key priority of the current Commission mandate, especially in the context of emerging risks such as climate change impacts and malicious attacks on critical energy infrastructure.	
	***Q24: Do you agree that there is a need for additional EU action concerning visibility and quantified benefits of innovative, digital and grid enhancing technologies?**	
		Neutral
	***Q25: In your view, should there be further measures to increase the efficiency of the existing grid?**	
		Yes
	*If yes, please specify:	Different measures are already in place in many countries, e.g. flexible grid connection arrangements and additional connection at existing connection points beyond the initial connection limit ("Überbauung"). Please see also the additional file, chapter 3.5.

XI.	**Flexibility** Pursuant to the existing EU regulatory framework, distribution network development plans shall provide transparency on the medium and long-term flexibility services needed and consider alternatives to grid development (such as flexibility, demand response or innovative grid technologies). There is also ongoing work between TSOs, DSOs, ACER and the Commission following up on the most recent revision of the Regulation (EU) 2019/943 on the internal market for electricity in 2024, mandating the regulatory authorities or dedicated authorities to conduct biannual assessment of flexibility needs. The relevant methodology, explaining inter alia the link to the network planning should be adopted in Q3/2025	
	***Q27: In this context, do you agree that the existing framework is sufficient for considering flexibility needs in network planning and development**	
		Neutral
XII.	**Simplification**	
	Q28: In view of simplifying the PCI/PMI selection process, to what extent do you agree with the following statements?	
	*The current frequency of the PCI/PMI selection process (every 2 years) should be decreased e.g. every 3 years	Neutral
	*The application of Project with PCI/PMI status should not be required to reapply for each PCI/PMI process, provided certain conditions are met (e.g. sufficient maturity, progress) policies, processes and practices, including i.e. information sharing and vulnerability disclosure, in the area of cybersecurity risk management sufficiently mitigates all relevant risks related to the ICT supply chain security of entities.	Strongly agree
	*The application process should be further simplified	Strongly agree
	Please specify your reply providing, where possible, qualitative and quantitative evidence.	
	Q29: In view of additional simplification measures, to what extent, do you agree that there is potential for simplification in the following areas?	
	*TYNDP process: Scenario building	Slightly agree
	*TYNDP process: infrastructure gap identification	Slightly agree
	*TYNDP process: Project assessment	Slightly agree
	*Offshore network development planning process	Neutral
	*PCI/PMI project monitoring and reporting	Slightly agree
	Please specify your reply providing, where possible, qualitative and quantitative evidence.	The project assessment in the TYNDP process should be improved rather than simplified. The results of the PS-CBAs need to become more transparent and reliable for some projects. With regards to offshore planning, it is important to involve also ENTSOG and later ENNOH alongside with ENTSO-E.