

# Feedback from: Vereinigung der Fernleitungsnetzbetreiber Gas e.V.

**Feedback reference**

F13722

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**Submitted by**

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**User type**

Business association

**Organisation**

Vereinigung der Fernleitungsnetzbetreiber Gas e.V.

**Organisation size**

Micro (1 to 9 employees)

**Country of origin**

Germany

**Initiative**

[Strategy for long-term EU greenhouse gas emissions reductions](#)

FNB Gas Members (FNB Gas) are committed to contributing to EU targets in line with the Paris Agreement.

FNB Gas welcomes the integrative approach taken by the European Commission (EC) to develop a strategy for the long-term GHG emissions reduction. FNB Gas has a strong willingness in contributing to this strategy based on its experience in Germany.

FNB Gas requests EC to take a holistic and macroeconomic approach towards means to reduce GHG emissions. By considering all CO<sub>2</sub> saving technologies - fuels and infrastructures - a sector integration (physical and market coupling of gas, power, heat and transport sectors) can be fostered with the aim to minimize societal costs and negative effects while achieving the EU energy transition by 2050. In this respect, FNB Gas would like to underline the financial, environmental and social benefits that the use of the gas infrastructure can provide and the potentials to make huge contributions to decarbonising the EU energy system while safeguarding security of energy supplies.

Gas infrastructure is an essential part of the backbone of the EU energy system and a valuable long-living asset. The further utilization of these assets can offer vast benefits for achieving energy and climate goals in the most cost-efficient way.

Today's gas infrastructure transports and stores enormous amounts of energy which is used for power generation, heating, transportation and as raw material for industry. Already now, the use of natural gas/gas infrastructure can deliver substantial emission reduction and thus improvements of air quality at relatively low cost by substitution of coal/lignite/oil in power/heat production and road/water transportation. By switching from natural gas to decarbonised/green gas (bio-gas/methane, hydrogen etc.) the existing gas infrastructure will in the future also allow for transportation and long-term storage of renewable wind/solar power e.g. through power-to-gas.

EU policy should reflect customer interests and encourage a decarbonized energy system aided by sector integration. This integration combines the strengths of all energy carriers

Joint planning of the EU gas and electricity infrastructure is the facilitator for a successful sectoral integration. The integrated asset development offers flexibilities in deployment of various technologies and thus helps to maintain SoS with the lowest carbon content and cost.

EU policies should promote cross sector solutions and services for energy supplies, transport and storage and hence treat green gases like renewable power. Trade barriers for green gases need to be abolished. Neither regulated nor non-regulated entities should be excluded from taking a pro-active role in the process of sectoral integration of green gases.

EU regulation should encourage investments in the energy sector that help to gain efficiency and drive innovation, new technologies and SoS.

Regarding the future energy mix, a fair and balanced technology-neutral approach towards decarbonized energy solutions in both gas and electricity infrastructure is required to incentivize innovative products and services. Operators of gas infrastructure need clear signals from EU and national regulation regarding the future energy mix in order to take the right investment decisions. FNB Gas believes that regulatory approaches to projects, infrastructure ownership and innovation need to be streamlined for the success of the EU “Energiewende”.

Gas transmission system operators are able and willing to meet the challenges of modernizing energy grids to achieve the energy transition.

EU regulation has to keep pace with the accelerating transition towards decarbonisation. Decisions aiming at long-term targets need to be taken very shortly. This transition will create new products, services and jobs, but will hardly work without sector coupling and digitalization.