

FSR Regulatory Policy Workshop Series 2025-2026

Energy Networks for the Green Transition

3 October 2025

Council of European Energy Regulators, Cours Saint-Michel 30a/F, BE-1040, Brussels

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To connect online (listening only)

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Introduction

EU energy grids play an essential role in supporting market integration, promoting competition and enabling the increasing penetration of renewable energy sources (renewable-based electricity and renewable gases, including renewable hydrogen). Without investment in grid expansion, modernisation, digitalisation and flexibility, connection delays will increase, and renewables and electrification will stall. This Workshop will look at the opportunities for streamlining and simplifying the EU network regulatory framework, at the most effective approach to enable efficient anticipatory investments, and at the regulatory approaches to electricity interconnectors with third countries.

EU energy grids play an essential role in supporting market integration, promoting competition and enabling the increasing penetration of renewable energy sources (renewable-based electricity and renewable gases, including renewable hydrogen)[1]. Without investment in grid expansion, modernisation, digitalisation and flexibility, connection delays will increase, and renewables and electrification will stall. In May 2022, the [Commission estimated](#) that €584 billion in grid investments are needed before the end of this decade to meet the Repower EU objectives.

Over the years, legislation has improved the framework for grid planning, development and operation. The 2013 Trans-European Networks for Energy (TEN-E) Regulation[2] established a new legal framework for cross-border energy infrastructure, replacing the 2006 bottom-up approach, by focussing on European planning – through the TYNDPs and the identification of Projects of Common Interest (PCIs) – and tools – such as regional cooperation, permitting streamlining and the cross-border cost allocation (CBCA) – to enable their implementation.



Following a full evaluation in 2020, the TEN-E Regulation was revised in 2022[3] to be aligned with the European Green Deal's objectives. The main changes concerned removing fossil gas from the scope, including hydrogen infrastructure in its scope, as well as a strengthened focus on offshore grids to facilitate achieving the offshore ambitions set out in the EU offshore renewable strategy[4]. The TEN-E framework now also includes Projects of Mutual Interest (PMIs) – cross-border projects with neighbouring non-EU countries – alongside the PCIs.

However, the evolving geopolitical context and risks and the increasingly ambitious energy and climate targets call for a reassessment of the regulatory framework applicable to energy grids. For this purpose, from May to August this year, the European Commission run a public consultation on the legal framework for European grids. The feedback received will feed into the Commission's work on the European Grids Package, as part of the [Competitiveness Compass\[5\] for the EU](#) and the [Clean Industrial Deal\[6\]](#), which is foreseen for publication before the end of 2025. The key objective of the European Grids Package will be to help upgrade and expand grids to support rapid electrification and speed up permitting

Against this background, this Workshop will cover three aspects aimed at enhancing the legal framework and the role of European energy grids.

- *Streamlining and simplifying the regulatory framework*

Earlier in the year, the FSR published a Policy Brief on 'Offshore wind energy in the North Seas: crafting collaboration and navigating governance'[7] and a Policy Paper on 'Trans-European energy networks (TEN-E) – ideas for simplification in view of accelerating project implementation'[8], providing suggestions for the review of the TEN-E Regulation, by focussing on the main priorities at the top of the Commission's agenda, namely simplification as well as competitiveness and affordability. Those suggestions were elaborated keeping in mind the urgency to invest in grids as well as the good track-record of the TEN-E policy framework.

The European Parliament recently adopted an own-initiative report on '*Electricity Grids: the backbone of the EU energy system*'[9] that highlights the critical role of modernising EU's grid infrastructure for the EU's energy transition and security. The report also: (a) emphasises the importance of grid resilience, of enhancing the regulatory framework and financing, and the role of anticipatory investments; (b) underlines the importance of local-level distribution grids and calls for a dedicated framework for their planning and financing; and (c) recommends making grid planning more efficient, taking into account the needs of sector integration at transmission and distribution levels.

At the same time, despite several PCIs having been implemented in the past decade, ACER's monitoring report[10] highlights delays, both in project preparation (technical studies, financing) and permitting procedures. It is therefore important and urgent to look at the planning and regulatory frameworks from the perspective of speeding up implementation. Whilst synergies can be built in certain areas – e.g. for scenarios underpinning modelling –, in other areas the differences between the well-meshed electricity grid and the green field nature of both hydrogen and CO2 networks should be acknowledged.

- *Promoting efficiency in anticipatory investments*

Anticipatory investments are forward-looking infrastructure investments based on identified medium- and long-term network needs. The lengthy timeframes traditionally required to develop grid projects might lead to significant delays in strengthening the energy networks and connecting new resources, which are instrumental to the energy transition, to the grid[11]. Therefore, now, more than ever, anticipatory investments are key not to delay the energy transition.

In June 2025, the Commission published a Notice on anticipatory investments for developing forward-looking electricity networks[12], to support Member States, national regulatory authorities and distribution and transmission system operators with recommendations for action in the whole process leading to a final investment decision. More specifically, the Notice covers and provides recommendations on a number of areas: (i) improvements in network planning to allow forward looking investments; (ii) the scrutiny regime for network development plans; (iii) allowing anticipatory investments while keeping electricity network tariffs and connection charges low; (iv) the regulatory scrutiny of network investments and incentives; (v) the perceived risks and risk mitigation strategies.

Previously, ACER and CEER published a Position Paper on anticipatory investment^[13], highlighting, *inter alia*, that anticipatory approaches are already used in network planning in several Member States, that the regulatory treatment does not differentiate anticipatory investments from other investments, that planning activities help evaluating anticipatory investments and that there are limited coordination roles on anticipatory investments. The Position Paper also offered a number of recommendations.

- *Enabling energy interconnectors with third countries*

The growing difficulty in building the renewable-based generation, necessary to support the decarbonisation process of the industrial sector, within the European Union, highlights the need to consider the opportunity to expand the geographical scope for the location of such generation to non-European regions. These regions are typically characterised by a better endowment of space, wind and solar resources and are therefore capable of providing energy production at competitive prices in the future.

In this context, some electricity interconnection projects have already been launched – both under the regulated and unregulated regimes – between countries in the Mediterranean basin, aiming at a deeper energy sector integration. This process can generate significant benefits both for the economic development of third countries and for the achievement of the EU's climate objectives.

The European regulatory framework, extremely mature and detailed when it comes to interconnections between Member States, is still incomplete and not always clear with regard to the integration with third countries, especially when these are implemented as merchant initiatives.

Furthermore, the rules that have stratified since the start of the liberalisation process do not fully take into account the needs of possible unregulated investments made by private operators who base their financing model on the cost competitiveness of generation outside the EU. These investments require a clear and stable framework for access to the European electricity network, so as to ensure the possibility of using long-term contracts (over a decade) with potential off-takers, and avoiding the risk of not being able to honour them due to physical or regulatory limitations in accessing the EU markets.

In July 2025, the Florence School of Regulation published a Research Report^[14] on this topic, proposing different regulatory schemes which might serve as a blueprint for the regulatory framework for electricity interconnectors with third countries.

To discuss these three topics, the Workshop will be structured in three sessions:

- Session I, in the morning, will look at the opportunities for streamlining and simplifying the TEN-E regulatory framework;
- Session II, also in the morning, will focus on the most effective approach to enable efficient anticipatory investments,
- Session III, in the afternoon, will discuss the regulatory approaches to electricity interconnectors with third countries outlined in the FSR Research Report.

Sustainability assessment

The FSR assesses the sustainability and carbon footprint of all its Workshops of the Regulatory Policy Workshop Series. This Workshop is run 'in presence' to promote more effective interaction and discussion. Participants travelling to Brussels by car or by air will be encouraged to offset any carbon emissions related to their travel. It is considered that, in this way, a suitable balance is achieved between the effectiveness of the policy dialogue and the net carbon footprint of the event.

Gender balance statement

At FSR we actively work to achieve gender-balanced representation at all our events. As a platform that connects diverse voices and perspectives in the sector, we firmly value inclusive and gender-balanced panel debates and training courses.

Available at:

[1] Commission Staff Working Document implementing the Repower EU Action Plan: Investment Needs, Hydrogen Accelerator and Achieving the Bio-Methane Targets accompanying the document Communication from the Commission to the European Parliament, the European Council, the Council, the European Economic and Social Committee and the Committee of the Regions, Repower EU Plan, Brussels, 18.5.2022, SWD(2022)230 final.

[2] Regulation (EU) No 347/2013 of the European Parliament and of the Council of 17 April 2013 on guidelines for trans-European energy infrastructure and repealing Decision No 1364/2006/EC and amending Regulations (EC) No 713/2009, (EC) No 714/2009 and (EC) No 715/2009.

[3] 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 (EC) No 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.

[4] Communication from the Commission to the European Parliament, the Council, The European Economic and Social Committee and the Committee of the Regions, An EU Strategy to harness the potential of offshore renewable energy for a climate neutral future, Brussels, 19.11.2020, COM(2020) 741 final.

[5] https://commission.europa.eu/topics/eu-competitiveness/competitiveness-compass_en.

[6] https://commission.europa.eu/topics/eu-competitiveness/clean-industrial-deal_en.

[7] Leonardo Meeus, Offshore wind energy in the North Seas: crafting collaboration and navigating governance, FSR Policy Brief, issue 2025/02, January 2025.

[8] Catharina Sikow-Magny, Trans-European energy networks (TEN-E) – ideas for simplification in view of accelerating project implementation, FSR Policy Paper, RSC PP 2025/13, July 2025.

[9] European Parliament resolution of 19 June 2025 on electricity grids: the backbone of the EU energy system (2025/2006(INI)), available at: https://www.europarl.europa.eu/doceo/document/TA-10-2025-0136_EN.html.

[10] Consolidated report on the progress of electricity and gas Projects of Common Interest, 2022; electricity infrastructure development to support a competitive and sustainable energy system, 2024

[11] For example, according to Wind Europe data, wind farms might have to wait as long as 9 years to get access to the network.

[12] C(2025) 3291 final. This notice defines anticipatory investment as “*as investments into grid infrastructure assets that proactively address network development needs beyond the ones corresponding to reinforcements relating to currently existing grid connection requests by generation or demand projects*” (page 3).

[13] ACER-CEER, Position on anticipatory investments, March 2024, available at: <https://www.ceer.eu/wp-content/uploads/2024/04/ACER-CEER-Position-on-Anticipatory-Investments.pdf>.

[14] Alberto Pototschnig and Leonardo Meeus, [The regulatory regime applicable to electricity interconnectors with third countries](https://cadmus.eui.eu/server/api/core/bitstreams/bd9cf077-70df-4d45-95ff-cf8cd56b8e63/content), Research Project Report, Florence School of Regulation, July 2025, available at: <https://cadmus.eui.eu/server/api/core/bitstreams/bd9cf077-70df-4d45-95ff-cf8cd56b8e63/content>.

Programme

- 09.00 – 09.15 Welcome and introductory remarks
Leonardo Meeus | Florence School of Regulation
Alberto Pototschnig | Florence School of Regulation
- 09.15 – 09.40 Keynote addresses: the policy perspective
Joachim Balke | Head of Unit, Infrastructure and Regional Cooperation, DG ENER, European Commission.

SESSION I – STREAMLINING AND SIMPLIFYING THE REGULATORY FRAMEWORK

Moderator: **Alberto Pototschnig** | Florence School of Regulation

- 09.40 - 09.55 Opening address
Catharina Sikow-Magny | Florence School of Regulation
- 09.55 – 10.25 The views of academics and civil society
Tooraj Jamash | Director, Copenhagen School of Energy Infrastructure
Frauke Thies | Co-Director Europe, Agora Energiewende
- 10.25 – 11.05 Roundtable of representatives of FSR Donors and general discussion
Benjamin Genêt | Elia
Michael Mieszczański | TransnetBW
Luis Ignacio Parada Diego | Enagás
Lucie Boost | GIE
Noemi Szabo | ENTSO-E
- 11.05 - 11.25 Coffee Break

SESSION II – PROMOTING EFFICIENCY IN ANTICIPATORY INVESTMENTS

Moderator: **Leonardo Meeus** | Florence School of Regulation

- 11.25 – 11.40 Opening address
Riccardo Vailati | Co-Convener, ACER Infrastructure Task Force in the Electricity Working Group, and ARERA
- 11.40 – 12.40 The view of the industry
Pascale Fonck | Board Member, ENTSO-E
Abel Enriquez | Director, ENNOH
Isabelle Chaput | Secretary-General, IFIEC
- 12.40 – 13.10 Contributions from FSR Donors and general discussion
Benjamin Genêt | Elia
Luis Ignacio Parada Diego | Enagás
Lucie Boost | GIE
- 13.10 - 14.00 Lunch break

SESSION III – ENABLING ENERGY INTERCONNECTORS WITH THIRD COUNTRIES

Moderator: **Catharina Sikow-Magny** | Florence School of Regulation

- 14.00 – 14.15 Opening address
Alberto Pototschnig | Florence School of Regulation
- 14.15 – 15.00 The view of project developers and regulators
Alessandro Fiocco | Head of European Office, Terna Group
Michele Vadora | Zhero Managing Director Medlink
Jan Kostevc | Team Leader, Energy Infrastructure, ACER
- 15.00 – 15.15 General discussion
- 15.15 – 15.30 Concluding remarks
Leonardo Meeus | Florence School of Regulation
Catharina Sikow-Magny | Florence School of Regulation