

Ensuring a secure and realistic energy transition: key priorities for the EU Grids Package

We, the undersigned organisations, call on EU co-legislators to ensure that the EU Grids Package delivers a secure, affordable and technically robust energy transition. Europe's decarbonisation pathway requires planning tools grounded in operational realities, governance structures that rely on system expertise, and regulatory mechanisms that protect consumers while enabling investments.

Infrastructure planning must be based on multiple scenarios

To ensure resilient and credible long-term grid planning across regions, sectors and voltage or pressure levels, infrastructure needs assessments must rely on multiple scenarios to reflect uncertainties in technology deployment, demand evolution and electrification pathways. Alongside the European Commission's own scenario, alternative scenarios should receive equal consideration.

Methodologies must build on system expertise

Planning methodologies should rely on the technical expertise of ENTSO-E, ENTSO-G and ENNOH, complemented by transparent consultation of stakeholders and Member States before ACER issues its opinion. Given the growing role of distributed resources, coordination with the DSO Entity is essential to ensure that planning methodologies reflect both transmission and distribution realities. A mere transfer of the task to ACER would compromise technical quality, create additional red tape and risk inconsistencies in the planning process.

Delete the mandatory allocation of 25% of congestion revenues

We urge co-legislators to remove the proposed obligation for TSOs to allocate 25% of congestion revenues to projects on the Union list.

This measure:

- lacks legal and analytical justification,
- risks increasing consumer bills,
- interferes with national regulatory autonomy,
- duplicates existing harmonised rules under Art. 19(2) Regulation (EU) 2019/943.

Congestion revenues are already ring-fenced and regulated; additional EU-level intervention would

undermine regulatory stability and investment predictability.

Our call to policymakers

We call on EU institutions to adopt a TEN-E framework that:

- **strengthens technical credibility,**
- **preserves national regulatory responsibilities,**
- **protects consumers,**
- **maintains system security,**
- **and supports Europe's long-term decarbonisation and energy security objectives.**

We stand ready to work with policymakers to contribute to a final agreement that is ambitious, realistic and aligned with system needs.