



**FEEDBACK on the INITIATIVE: Proposal for a
Revision of the Regulation on Guidelines for
Trans-European Energy Infrastructure (TEN-E)
([Link](#))**

Position Paper

**Austrian Federal Economic Chamber (WKO)
EU Transparency Register No 10405322962-08**

February 2026

WKO Position Paper on the EC Proposal for a Revision of the Regulation on Guidelines for Trans-European Energy Infrastructure (TEN-E). (2025/0399 (COD))

The Austrian Federal Economic Chamber generally welcomes the current proposal, as it focuses on the rapid expansion of cross-border energy infrastructure and can therefore make an important contribution to the creation of a genuine energy union. Against the backdrop of rising demand for electrification and geopolitical challenges, it is both appropriate and necessary to advance the expansion of European energy networks as quickly and as coordinately as possible.

We further welcome the draft's objective of providing greater clarity regarding the allocation of financing responsibilities and cost-sharing arrangements. Transparent, predictable, and comprehensible rules are essential to ensure investment certainty, facilitate timely project implementation, and prevent protracted coordination processes between Member States..

Nevertheless, we remain critical of certain aspects, in particular the pronounced overall focus of the European Grids Package on electricity. The specific system functions of hydrogen and CO₂ infrastructure—especially with regard to long-term flexibility, seasonal balancing, resilience, and the decarbonisation of industry—are not accorded adequate consideration.

Additionally, it is absolutely crucial that the continued protection of economically sensitive data is ensured. deterioration in this regard compared to the existing regulation. Furthermore, it is of paramount importance to ensure the continued protection of economically sensitive data. There must be no weakening of the level of protection in comparison with the one in existing regulatory framework.

In the following, we would like to address some especially important aspects in greater detail:

On cost Allocation and cost-benefit analysis:

Necessity to include all relevant stakeholders The analysis is conducted exclusively within the energy sector (see Articles 11 ff.). However, the relevant stakeholders, particularly energy-intensive industries, must be placed more clearly at the center of the assessment and should not be treated merely as data providers (see Article 12). Particular emphasis should be placed on the effect of energy prices on international competitiveness of businesses. Accordingly, sensitivity analyses should also examine the impacts on competitiveness as well as the short- and long-term price developments affecting European businesses.

Costs are ultimately passed on to electricity customers. Therefore, provisions should be established at all regulatory levels including under the current TEN-E Regulation to ensure that sectors exposed to international competition are protected from competitiveness-distorting disadvantages. Such safeguards should be reflected in all provisions relating to cost allocation (in particular Articles 17, 19, and 20).

But at the same time, the market should not be undermined, so as not to hinder or prevent the functioning of efficient price formation.

On cyber security:

Provide sufficient protection against cyber security threats It should be borne in mind that cross-border infrastructure projects are also exposed to cyber risks and should therefore comply with applicable cybersecurity requirements, in particular those set out under NIS2 and comparable frameworks. From a security perspective, Policy Options 2 and 3 proposed by the Commission appear to be the most appropriate. By contrast, monitoring as envisaged under Policy Option 1 is, in our view, unlikely to significantly enhance the overall level of security.

On Hydrogen and CO₂ Infrastructure:

Electricity-based focus is as limiting factors for hydrogen and CO₂ infrastructure Electricity-focused scenario and assessment frameworks as constraints on hydrogen and CO₂ infrastructure: The definition of requirements, grid development planning and project evaluation based on scenarios that primarily focus on the development of the electricity system. The specific requirements of hydrogen and CO₂ infrastructure - particularly with regard to seasonal storage, resilience and industrial decarbonisation - are not sufficiently taken into account, especially in terms of their impact on the electricity system. A cross-sectoral scenario framework is therefore needed that also captures the storage and transport requirements of hydrogen and CO₂

Recognise hydrogen storages as independent system components Under the TEN-E Regulation, hydrogen storage facilities are not treated as independent infrastructure with their own systemic function but are functionally assigned to the pipeline-based hydrogen infrastructure. Consequently, storage facilities are primarily regarded as complementary elements of transport and pipeline projects. This classification directly affects the treatment of hydrogen storage projects in EU-wide network development planning. Storage projects must align with pipeline- and transport-centric planning in order to be considered for prioritisation and funding. However, the systemic impact of hydrogen storage facilities (particularly in terms of long-term flexibility, seasonal balancing, and security of supply) often cannot be adequately reflected in such network development and planning logic, as their impacts are frequently indirect, time-shifted, or regional in nature. In addition, hydrogen storage cannot be developed arbitrarily, as suitable locations depend on geological conditions. Planning should therefore start from the locations where the required storage capacities can realistically be created, with grid expansion subsequently aligned to these locations. Despite their systemic importance, hydrogen storage facilities are thus structurally disadvantaged and have only limited access to the instruments of the TEN-E Regulation. Hydrogen storage facilities should therefore be recognised as independent systemically important infrastructure and taken into account in network development planning independently of direct transport effects.

Consider supra-regional impact of hydrogen storage facilities	Insufficient consideration of the supraregional impact of hydrogen storage facilities in the PCI assessment criteria: The evaluation criteria for projects of common interest (PCI) focus on market integration and cross-border transport effects. The supraregional system function of hydrogen storage facilities is not sufficiently taken into account. As a result, storage projects—whose benefits mainly arise from long-term flexibility, seasonal balancing, and security-of-supply functions—are difficult to assess adequately under the current framework. The PCI assessment criteria should explicitly consider the contributions of hydrogen storage facilities to security of supply, system stability and seasonal balancing.
Recognise hydrogen storages as independent decarbonisation infrastructure	Transport-centred design of CO ₂ infrastructure without adequate consideration of CO ₂ storage facilities: CO ₂ infrastructure is primarily defined along the transport chain, with CO ₂ storage facilities functionally regarded as end points rather than as independent infrastructure with their own system function. This approach does not adequately reflect the role of CO ₂ storage facilities as a key prerequisite for industrial decarbonisation and the implementation of CCUS. CO ₂ storage facilities should be recognised as independent decarbonisation infrastructure.
Retain the 50 MW threshold for electrolyzers	Raising the minimum capacity threshold for electrolyzers as a barrier to entry: According to Annex II of the TEN-E Regulation, electrolyzers are to be considered only if they have an installed capacity of 500 MW or more, representing a significant increase from the previous threshold of 50 MW. In light of the still gradual ramp-up of the hydrogen economy and the current project landscape, this threshold is not appropriate. It effectively limits the TEN-E framework to a small number of very large-scale projects and excludes the majority of realistically implementable projects. The previous minimum threshold of 50 MW should therefore be retained.
Restrictive requirement for hydrogen storage facilities to be connected to high-pressure pipelines.	According to Annex II of the TEN-E Regulation, hydrogen storage facilities are considered relevant infrastructure only if they are connected to high-pressure hydrogen transmission pipelines, effectively making such a connection a prerequisite for their recognition. However, this requirement does not adequately reflect current practice. In some member state, particular in Austria, storage facilities are predominantly connected to the distribution network, where they perform essential system functions. An exclusive focus on high-pressure (long-distance) pipelines should therefore not become a barrier to the inclusion of large-scale hydrogen storage facilities. The consideration of hydrogen storage facilities should be independent of the grid level to which they are connected to.

On the development of the common central scenario:

Ensure sufficient regional and national stakeholder involvement	The introduction of a common central scenario by the European Commission is a sensible step, as it provides a clearer strategic vision for the development of energy infrastructure and enables better coordination between the electricity, hydrogen, and gas sectors. At the same time, it must be ensured that important national developments, specific characteristics, and planning priorities are not overlooked. Close and continuous dialogue with national stakeholders and experts is therefore
--	--

essential to ensure that European planning remains realistic and enjoys broad acceptance among Member State.

Furthermore, a common central scenario should fully leverage the benefits of sector coupling. To this end, it is important to take into account, from the outset, not only the electricity, gas, and hydrogen sectors, but also the heating and cooling sectors as well as CO₂ infrastructure.

On smart gas grids:

Keep project category 'smart gas grid' due to the importance of gas as a bridging technology

The former project category 'Smart Gas Grids' has been deleted. We deeply regret the removal of this category. Gas will continue to play a crucial role as a bridging technology, at least in the medium term. With appropriate planning and design, existing gas infrastructure can be adapted to transport low-carbon and renewable gases in the future, thereby making a significant contribution to achieving climate targets. Furthermore, gaseous energy carriers enable the transport of energy over long distances in many cases more efficiently than electricity grids. For this reason, smart gas grid connections should not be overlooked, particularly with regard to ensuring energy security across Europe.

Conclusion

The proposed revision of the TEN-E-Regulation provides important impetus for the quick expansion of European energy infrastructure. While greater transparency in financing and cost allocation is welcome, the entire Grids Package remains unbalanced in its overly strong focus on electricity. Hydrogen and CO₂ infrastructures, in particular storage facilities, are structurally disadvantaged, and their systemic importance is underestimated. In addition, stronger national participation and genuinely cross-sectoral planning are needed to develop realistic, forward-looking scenarios capable of supporting the creation of a resilient Energy Union.



Contact:

Jürgen Streitner, Director of Environment and Energy Policy Department, +43 590 900-4195, juergen.streitner@wko.at

Claudia Hübsch, Environment and Energy Policy Department, +43 590 900-3007, claudia.huebsch@wko.at

Mathilda Ketunuti, Environment and Energy Policy Department, +43 590 900-3316, mathilda.ketunuti@wko.at

Barbara Lehmann, Brussels, EU Representation WKO, +32 2 286 58 80 barbara.lehmann@eu.austria.be

