

**OPINION No 06/2021  
OF THE EUROPEAN UNION AGENCY  
FOR THE COOPERATION OF ENERGY REGULATORS**

**of 27 July 2021**

**on ENTSOG's Summer Supply Outlook 2021**

THE EUROPEAN UNION AGENCY FOR THE COOPERATION OF ENERGY REGULATORS,

Having regard to Regulation (EU) 2019/942 of the European Parliament and of the Council of 5 June 2019 establishing a European Union Agency for the Cooperation of Energy Regulators (hereinafter referred to as “ACER”), and, in particular, Article 4(3)(b) thereof,

Having regard to Regulation (EC) No 715/2009 of the European Parliament and of the Council of 13 July 2009 on conditions for access to the natural gas transmission networks and repealing Regulation (EC) No 1775/2005, and, in particular, Articles 9(2) and 8(3) thereof,

Having regard to the outcome of the consultation with the ACER's Gas Working Group,

Having regard to the favourable opinion of the Board of Regulators of 13 July 2021, delivered pursuant to Article 22(5) of Regulation (EU) 2019/942,

Whereas:

**1. INTRODUCTION**

- (1) On 12 April 2021, the European Network of Transmission System Operators for Gas (“ENTSOG”) published the Summer Supply Outlook 2021 pursuant to Article 8(3)(f) of Regulation (EC) No 715/2009.
- (2) Pursuant to Article 4(3)(b) of Regulation (EU) 2019/942, ACER may provide an Opinion to ENTSOG on, inter alia, relevant documents referred to in Article 8(3) of Regulation (EC) No 715/2009, as submitted to ACER pursuant to Article 9(2), first subparagraph, of Regulation (EC) No 715/2009.

**2. SUMMARY OF THE DOCUMENT**

- (3) In the Summer Supply Outlook 2021, ENTSOG undertakes an assessment of the European gas network for the upcoming summer. The analysis investigates the possible evolution of the supplies and the injection in the storages as well as the ability of the gas

infrastructures to handle gas flows to serve the demand, the exports and the storage injection needs during the summer 2021. ENTSOG has used a reference objective of reaching a 90% level of storage capacity by 30 September 2021, and performed a sensitivity analysis considering different scenarios of injection targets and flexibility of injection between 80% and 100% of storage levels.

- (4) ENTSOG finds that the European gas network is sufficiently robust in most parts of Europe to enable at least 90% gas storage level in preparation of the upcoming winter, also considering maintenance to ensure infrastructure reliability in the long term and flexibility for the network users' supply strategy<sup>1</sup>. These main findings are based on supply assumptions used for the modelling, namely that the minimum and maximum daily average gas supply potentials from various sources (Algeria, Libya, Norway, Russia and LNG) during the 2021 injection season would be identical to the daily average minimum and maximum supply observed over a six-year period (historical availability, April-September 2015-2020)<sup>2</sup>, with maximum supply from LNG basins identical to the maximum supply potential defined in the TYNDP 2020<sup>3</sup>. ENTSOG provides the relevant data and the assumptions in the annexes to the Summer Supply Outlook 2021.

### **3. ASSESSMENT OF THE DOCUMENT**

- (5) ACER welcomes the publication of the Summer Supply Outlook 2021 by ENTSOG in due time, ahead of the summer season.
- (6) ACER appreciates and underlines the importance of the main conclusions contained in the Summer Supply Outlook 2021 as indicated above. However, ACER notes that conclusions are only valid to the extent to which gas supply from the various sources would actually be available in the volumes used for the purpose of the modelling, which are based on historically observed volumes over a 6-year period of time when no significant disruptions of supply flows occurred.
- (7) ACER reiterates its view that the modelling approach thus assumes that import gas supplies will always be available to serve demand, i.e. there will always be "additional flexibility" per supply source, and the modelling checks whether the gas transmission network and storages are able to handle the supplied volumes, including by injecting gas in storage. ACER notes that ENTSOG may consider acting on ACER's outstanding invitation to consider including in future supply outlooks an analysis of the potential changes in supply as an independent variable<sup>4</sup>.
- (8) ACER is of the view that it would be pertinent for the Summer Supply Outlook 2021 and for future supply outlooks to provide a more detailed assessment of the potential risk to which Member States would be exposed in case of significant disruption of supply from

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<sup>1</sup> Cf. ENTSOG's SSO 2021, p. 3.

<sup>2</sup> Ibid., Annex B, p 20.

<sup>3</sup> Ibid., p. 6.

<sup>4</sup> Cf. ACER's Opinion No. 16/2019, pt. 12.

the various sources. ACER notes that such a risk assessment could be provided by analogy to the risk-based approach foreseen under Article 6(1)(c) of Regulation (EU) 2017/1938<sup>5</sup>, whereby for summer supply outlooks the 30-day period would be the period of most intensive injection of gas into storage and for winter outlooks the period foreseen in Regulation (EU) 2017/1938.

- (9) ACER reiterates its invitation to ENTSOG to consider the various roles which gas supply from UGS may play, such as the role of providing gas for covering baseload and the role of providing gas for peak demand shaving, and highlighting its findings in upcoming Winter and Summer Outlooks<sup>6</sup>,

HAS ADOPTED THIS OPINION:

1. ACER is of the view that ENTSOG' Summer Supply Outlook 2021 meets the objectives of Regulation (EU) 2019/942 and Regulation (EC) No 715/2009 in terms of contributing to non-discrimination, effective competition and the efficient and secure functioning of the internal natural gas market.
2. ACER invites ENTSOG to carry out supplemental modelling analyses aimed at identifying, by analogy to Regulation (EU) 2017/1938, Member States which could be exposed to the risk of not achieving at least 80% level of gas in storage in case of a gas supply disruption over a 30-day period of most intensive injection of gas into storage. ACER would appreciate if ENTSOG could inform ACER in due time about the results of the supplemental analysis, in view of notifying the relevant Competent Authorities in the potentially concerned Member States, if any.

This Opinion is addressed to ENTSOG.

Done at Ljubljana, on 27 July 2021.

**- SIGNED -**

*For the Agency  
The Director*

C. ZINGLERSEN

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<sup>5</sup> Regulation (EU) 2017/1938 of the European Parliament and of the Council of 25 October 2017 concerning measures to safeguard the security of gas supply and repealing Regulation (EU) No 994/2010, OJ L280/1, 28.10.2017. Also considered should be the risk assessments as foreseen in Article 7 of Regulation (EU) 2017/1938.

<sup>6</sup> Cf. ACER's Opinion No 16/2019, pt. 14.