

## Strengthening the UK's Gas Market Resilience and Infrastructure for the 2030s

Brussels, 18 February 2026 - *Energy Traders Europe* is the leading industry association of energy trading companies, representing over 170 member companies across Europe. We promote well-functioning wholesale energy markets, supporting liquidity, transparency, and efficiency, and engage with regulators and policymakers to facilitate dialogue across the sector.

This response is provided to support the UK Government's consultation on gas system resilience and infrastructure, helping to inform decisions on maintaining secure, efficient, and commercially viable gas supply networks.

### Detailed comments

**Question 1: Do you agree with the assessment that, as supply from the UK Continental Shelf continues to naturally deplete, imbalances between supply and demand may become possible in low-probability, high-stress scenarios?**

From a market participant's perspective, this assessment is broadly reasonable, however we would note that national energy policies can affect the rate of production decline. Nonetheless, declining domestic production increases reliance on imports, exposing the system to external factors such as geopolitics, weather, and international market volatility. While low-probability, high-stress scenarios are rare, reduced domestic flexibility makes the system more sensitive to shocks, impacting both prices and trading strategies.

**Question 2: In light of the analysis outlining the priority of ensuring gas infrastructure capacity, do you think the market will respond to provide such insurance for low probability, high stress scenarios?**

Markets respond well to recurring, price-signalled risks, but are less suited to delivering capacity required only in rare, extreme scenarios. Where utilisation and revenues are highly uncertain, the market alone may not provide the level of insurance envisaged.

**Question 3:** ~~What gas supply and demand scenarios are you using for planning in your organisation and why?~~

**Question 3a:** ~~What impacts to your sector/business have you identified using these scenarios?~~

**Question 3b:** ~~What mitigating actions are you considering against the supply and demand scenarios your organisation is using for planning?~~

**Question 4:** Do you agree with the assessment that ensuring resilient infrastructure capacity is a key priority as the gas supply mix changes?

Yes, resilient infrastructure supports confidence and orderly market functioning, helping manage volatility and disruptions as the supply mix evolves. Resilient infrastructure underpins well-functioning markets through providing reassurance that gas will be flowing and risk of interruptions is remote.

**Question 5:** In light of the analysis outlining the priority of ensuring resilient infrastructure capacity, do you think the market will respond to achieve this priority?

The market is likely to deliver capacity when supported by confidence in sustained demand and clear price signals. However, additional capacity aimed primarily at rare stress events may not be delivered on a purely commercial basis.

**Question 6:** Do you agree with our assessment that ensuring a viable commercial model for infrastructure capacity is a key priority for the gas sector?

From a market participant's perspective, a viable commercial framework for infrastructure capacity is fundamental for its business model. A robust commercial model for

infrastructure provides reassurance that tariffs charged for its use remains stable, which supports investment decisions and taking strategic decisions for the future. Where investment signals are credible and revenues are predictable, the market is generally able to deliver capacity that supports the vast majority of credible stress scenarios. However, it is also recognised that the most extreme events may fall outside what can be efficiently addressed through purely commercial models. In that context, a clear and durable commercial framework can be seen as the primary line of resilience, with well-designed targeted policy intervention acting as a backstop for use only in truly exceptional circumstances.

**Question 7: In light of the analysis outlining the priority of ensuring commercially viable infrastructure capacity, do you think the market will respond to achieve this priority?**

Where there is a clear commercial rationale, the market can be expected to respond. Infrastructure required mainly for non-commercial or highly infrequent scenarios is less likely to be delivered or sustained without additional mechanisms. In addition, if underutilised pieces of infrastructure are still expected to be financed through tariffs alone, it can be expected to negatively affect the attractiveness of capacities throughout the system.

**Question 8: Government's assessment is that existing LNG infrastructure is robust and commercially viable, do you agree?**

Please refer to our answer to question 39.

~~**Question 8a: If not, what actions do you think would be required to protect the strategic importance of existing LNG infrastructure?**~~

**Question 9: Is there a strategic case for enhancing or expanding storage capabilities at LNG terminals?**

There may be a case for additional LNG storage where it is supported by sustained utilisation and clear commercial signals. From a market perspective, LNG infrastructure and associated storage are typically developed in response to expected demand, price differentials, and needed flexibility. Where these fundamentals justify additional capacity, the market is likely to respond. However, storage built primarily for infrequent stress scenarios may be more challenging to justify on a purely commercial basis.

**Question 9a: What role should government play in supporting this?**

The primary role of government is to provide a stable and predictable regulatory and policy framework that enables market participants to assess long-term investment risks. Where broader system resilience objectives extend beyond what can be efficiently delivered through market incentives alone, there may be a role for targeted policy mechanisms that align commercial outcomes with security-of-supply considerations, while avoiding distortion of normal market signals. Consideration must also be given to ensuring regasification capacity and pipeline capacity is available to allow any additional stored LNG to be utilised when needed.

**Question 10: Do you agree with the assessment that the introduction of an FSRU could help ensure gas infrastructure and resilience?**

An FSRU could contribute to system resilience by increasing import flexibility and reducing reliance on a narrower set of supply routes. From a trading perspective, such optionality can be valuable, particularly during periods of market stress. That said, the effectiveness of an FSRU in enhancing resilience would depend on its commercial structure, utilisation profile, and integration with existing infrastructure, rather than its presence. Answer to this question will therefore depend on the investment scenario considered.

**Question 11: Do you agree that there are no significant barriers to entry for new LNG entry points, including for an FSRU, and that the market can deliver additional capacity if this is necessary?**

Yes.

**Question 11a:** ~~If not, what could government do to resolve the barriers to entry for new LNG entry points?~~

**Question 12:** Do you consider there to be other advantages and/or disadvantages of government directly chartering and appointing an operator of an FSRU, to be operated as a strategic gas supply source?

Government chartering of an FSRU could enhance resilience in exceptional circumstances, but it also carries risks. In particular, it may dampen private investment incentives and complicate market dynamics if access and activation are not tightly defined. From a market perspective, any such arrangement would need clear, transparent rules to ensure it supports, rather than disrupts, normal commercial behaviour.

**Question 13:** ~~Please explain whether and how you think it would impact your role in the market and your current operating model if HMG were to directly charter an FSRU.~~

**Question 14:** How can the strategic importance of interconnector capacity be protected, and what actions do you think might be required?

As interconnector capacity becomes more critical with changes in the supply mix, its strategic importance is best protected through stable market arrangements that support availability, maintenance, and efficient utilisation. While commercial incentives should remain the primary driver, regulatory clarity and coordination may be required to ensure capacity remains accessible and reliable under stressed conditions. Continued utilization of interconnectors will also rely on consistent rules governing capacity bookings and nomination in the UK and neighbouring countries, and adequate alignment of broader energy regulation, thereby facilitating frictionless trade of energy in both directions.

**Question 15:** How can geological storage capacity and deliverability levels be protected and what actions do you think might be required?

The strategic role of storage is best protected by maintaining a commercial framework that supports its economic use and deliverability. Where storage provides clear market value, participants will utilise and invest in it accordingly. Targeted support should be considered only if there is clear evidence that underinvestment threatens system security, and should be carefully designed so as not to distort existing storage signals.

**Question 16: To what extent do you think targets and compulsory stock obligations would address any of the three priorities set out in Chapter 2 (ensuring sufficient infrastructure capacity; ensuring resilient infrastructure capacity; and commercially viable infrastructure capacity)?**

Targets and compulsory stock obligations may offer some support to **sufficiency** in extreme emergency scenarios, but they are poorly aligned with the objectives of **resilience** and **commercial viability**. Gas storage has historically been filled and utilised efficiently through market signals, with participants responding to expected demand, supply availability, and seasonal price spreads. This market-based approach allows storage to provide flexibility dynamically, at lowest overall cost to the system.

Experience with EU storage filling obligations demonstrates that mandatory targets can undermine this dynamic, for example, see the Frontier study requested by the German Ministry of Economics and Energy from 2025<sup>1</sup>. By imposing fixed filling requirements, obligations lock in volumes regardless of prevailing market conditions, reducing the ability of storage to respond flexibly to changes in supply, demand, or price signals. This can increase system costs, amplify price volatility, and crowd out commercial optimisation, particularly when obligations must be met in periods of weak economic incentives.

Compulsory stock obligations also weaken **commercial viability** by shifting risk from market participants to the system as a whole. Where storage is filled because it is economically rational, obligations are unnecessary; where it is not, mandates can discourage efficient behaviour and deter investment by creating regulatory risk and

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<sup>1</sup> ["EVALUIERUNG DER GASSPEICHERFÜLLSTANDSVORGABEN"](#), 10/2025, Frontier Economics & BMW (German Ministry of Economy and Energy).

uncertainty around future returns. Over time, this can reduce incentives to maintain or expand storage and infrastructure capacity.

Overall, policies that preserve or strengthen market-based incentives are more effective in supporting all three priorities. Mandatory stock obligations risk delivering static volumes at high cost, while undermining the flexibility and investment signals required for a resilient and commercially sustainable gas system.

**Question 17:** What are your views on the strategic storage options outlined above in relation to addressing the priorities set out in Chapter 2 (ensuring sufficient infrastructure capacity; ensuring resilient infrastructure capacity; and commercially viable infrastructure capacity)?

**Markets will deliver a storage filling level that is deemed commercially attractive** given the circumstances (including the summer-winter spread, expected availability of gas and forecasted demand). **If additional insurance is sought by the authorities for low-probability and high-risk events, strategic stocks could be an option with the fewest downsides regarding existing market designs and should be preferred to recurring market interventions or mandatory storage filling obligations.** How large these would be and whether the additional costs, both directly (cost of gas, cost of storage) and indirectly (greater price spikes due to reduced market flexibility), are worth the perceived benefits, ultimately is a political decision. Like mandatory filling targets, strategic stocks can distort market outcomes by withdrawing storage capacity and volumes from commercial use, but when designed as an exceptional backstop with narrowly defined activation conditions focused on emergency situations, they may help address extreme situations while minimising interference with day-to-day market functioning. To contain the negative impacts of strategic stocks on the market, the framework governing the establishment, maintenance and use of the reserve needs to be carefully planned - please refer to our answer to Q20 for further details

**Question 17a:** Do you recommend a specific strategic gas storage option?

If a strategic storage option is required, it should function as a narrowly defined emergency backstop. Leasing or part-ownership of existing domestic or international storage could provide resilience quickly, but only where commercial storage would not deliver sufficient capacity. Ideally, storage should remain **owned and operated by the market**, with government involvement strictly limited to emergency activation.

**Question 17b: Are there any alternative strategic gas storage options we have not listed?**

An alternative option could be a “peak demand product”, that would draw from existing assets and be offered via competitive tenders.

**Question 18: How would a strategic storage reserve impact your role in the market (would it have a positive, neutral, or negative effect on your current operating model)?**

Any government intervention to establish a strategic storage reserve would reduce commercial flexibility and constrain the market’s ability to respond to price signals. Even if designed as an emergency backstop, reserved volumes are removed from normal trading, limiting liquidity and potentially weakening investment incentives. As such, the overall impact on market participants would be **negative**, with the scale of effect depending on the size and rules of the reserve.

**Question 19: Who would be best placed to operate a strategic storage site, purchase the gas, and set conditions of use?**

Commercial operators are best placed to run storage day-to-day. Government oversight should be limited to setting clear emergency activation rules or using an intermediary (e.g., system operator) to ensure resilience under extreme conditions, without interfering in routine market operations.

**Question 20: What other factors, including gas usage and refilling terms, should be considered in any strategic gas storage proposal (either through new facilities or by securing capacity at existing sites)?**

To contain the negative impacts of strategic stocks on the market, the framework governing the establishment, maintenance and use of the reserve needs to be carefully planned, including:

1. The **establishment** of the reserve should be done **via a transparent, competitive process**, where market players offer the necessary volumes at most attractive prices, and determined at national level, taking into account its specificities (e.g. storage capacity, LNG capacity, etc.)
2. The size of the strategic stock will inevitably limit the amount of storage for commercial use, limiting the market's ability to counteract price spikes efficiently. The **reserve should therefore be limited to securing the essential demand of the most vulnerable consumers** in a crisis, where the market can no longer function.
3. The **conditions for the use, replenishment and/or dissolution** of the reserve need to be clearly defined upfront, to prevent market distortions. Rules should provide certainty that the strategic stock will only be used in an emergency and will hence not affect day-to-day operations of the market.
4. The establishment of a strategic stock for security of supply reasons is by definition for the **benefit of the entire economy** (i.e. not just gas consumers) thus **maintenance costs**, which are substantial and recurring, **should be socialised**. In addition, no related cost recovery mechanism should affect cross-border gas trading.

**Question 21: What are the implications of leasing part of an existing or future storage site, either in GB or abroad?**

Leasing part of an existing or future storage site, domestically or internationally, reduces the volume available for commercial trading, constraining market flexibility and liquidity. It also introduces operational complexity, regulatory requirements, and potential cross-border restrictions, particularly for overseas sites, which may carry transport, legal, and geopolitical risks. While leasing avoids the high costs and long lead times of developing new storage, it typically carries a premium for assured availability. Any decision to lease should carefully weigh these costs and risks against the market's ability to deliver flexibility and resilience through commercial mechanisms.

**Question 22:** ~~Please provide any evidence on the cost of developing a new storage facility.~~

**Question 23:** ~~Please provide any estimations on the cost of leasing existing storage capacity?~~

**Question 24:** Should we attempt to encourage or require shippers to enter more long-term contracts with producers? If yes, can you explain what mechanism you believe to be most appropriate to encourage or require long-term contracting?

The market is best placed to determine the optimal mix of contract durations, and there should be **no mandatory requirements** for shippers to enter long-term contracts. Forcing long-term arrangements is fundamentally counterproductive, risks distorting market signals, reducing flexibility, and increasing costs for consumers.

Where long-term contracting is beneficial, it should emerge **voluntarily through commercial incentives**, such as stable price signals, predictable demand, or risk-sharing arrangements between buyers and producers. Government's role should be limited to maintaining a supportive commercial environment – ensuring regulatory clarity, transparent market rules, and minimal barriers – so that market participants can enter longer-term contracts where they make economic sense.

**Question 25:** Do you agree with the assessment that there would be limited benefits to security of supply or to consumer prices if we entered the wholesale market and purchased gas directly?

Yes. Direct government procurement would risk displacing private market activity, disrupting the efficient allocation of gas, and weakening price signals. For these reasons, any potential benefits to security of supply or consumer prices would be at best short-lived and limited.

**Question 26:** If HMG were to secure gas on the wholesale market directly, what would be the impact on your current operating model and position in the market?

State participation in the wholesale gas market would increase regulatory risk and dampen trading activity, particularly if the timing, conditions, or pricing of government-held volumes were unclear. This uncertainty could disrupt normal market operations, distort price signals, and constrain the market's ability to allocate supply efficiently, creating challenges for commercial participants in managing positions and risk. It will also likely be suboptimal for the state to set up such activities from scratch, instead of relying on market mechanisms to secure additional volumes.

**Question 27:** Do you think industrial demand side response measures are helpful in either ensuring sufficient infrastructure capacity; ensuring resilient infrastructure capacity; or ensuring commercially viable infrastructure?

Industrial demand-side response can offer **some additional flexibility during periods of system stress**, helping to ease short-term pressure on supply and reduce peak deliverability needs. While the scale of this contribution varies from country to country, it can rather add to system flexibility, than commercial viability of the system.

~~**Question 28:** Are you aware of National Gas' existing Demand Side Response scheme for Daily Metered consumers?~~

~~**Question 29:** If you were aware of the scheme, are there any change(s) that would make it more likely for your organisation to submit a bid to the existing scheme?~~

**Question 30:** Do you think the possible commercial support options outlined would address any of the three priorities set out in Chapter 2 (ensuring sufficient infrastructure capacity; ensuring resilient infrastructure capacity; or commercially viable infrastructure capacity)? Please include any additional evidence you have on why action of this kind is/is not required in your answer.

The tariff spiral problem is well known and quite universal across Europe, hence we appreciate that the consultation seeks to explore potential solutions. We believe that, whenever security of supply considerations underpin the decision to sustain the gas infrastructure that is heavily underutilised, some form of cost socialisation needs to be considered as further increasing tariffs only worsens the underutilisation of the assets.

**Question 31: If you do think these commercial models address one of the three priorities, which option(s) do you believe to be most appropriate? Please provide evidence of how these options could work for the three types of gas flexibility facilities (LNG terminals, interconnectors, and storage sites) focused on in this chapter.**

Out of the options considered, the RAB model alone is unlikely to address the problem of commercial viability – warranted revenue would still need to be recovered via falling throughput, while the performance incentives are unlikely to encourage divestment decisions. Cap and floor and contracts for difference approaches are more likely to sustain commercial interest in using all three asset types before outright commercial support is required. The approach envisaged for storage filling in France can serve as an example of a similar measure which proved to be efficient. While the capacity frontstop/backstop could provide similar level of reassurance to the infrastructure operator, it will be more difficult to design (requiring rules on handling the capacities reserved by the government) and more likely to prove distortive to the market. Finally, the capacity market for gas would need to be defined in further detailed if it was to be evaluated properly, though effectively a form of subsidy that could contain the level of tariffs charged for capacity could help addressing the problem.

**Question 32: What might be the possible advantages and drawbacks (including unintended consequences) of such an intervention in the market?**

From the perspective of the broader market, the main benefit of commercial support to infrastructure owners/operators should be containing and stabilising tariffs charged for their services which in turn enhances energy security. This should support higher utilisation of the gas network, and sustain the flexibility and security that it offers. These benefits need to be weighted against the costs of such support and careful consideration

needs to be given to the way these costs are socialised. Additional drawbacks may also be stemming from outright participation of the state in the market – it can crowd out commercial actors, reduce market flexibility, and negatively affect price formation mechanisms.

**Question 33:** ~~Are there other alternative models that are preferable to those listed above? Please outline the basic principles of an alternative model and why you would believe it would be more appropriate.~~

**Question 34:** ~~What are the risks and opportunities of interaction between a possible gas storage commercial support model and other business models in energy, notably hydrogen storage and carbon dioxide storage?~~

**Question 35:** To what extent do you think the current gas framework will remain fit for purpose over the coming decades? What changes, if any, need to be made and why?

Many of the main principles governing the gas market today will remain valid in the future. One of the main challenges that the sector is facing in Europe is the one explored under this consultation i.e. falling throughput and difficulties with sustaining underutilized assets. This goal can be further reinforced through updating rules governing capacity allocation to increase the flexibility of the process (mirroring the ongoing revision of NC CAM in the EU).

**Question 36:** ~~Do you expect the standards set out in the GS(M)R to remain suitable should GB become more reliant on imported gas generally, and LNG for baseload supply? If not, why, and how could this be alleviated?~~

**Question 37:** How might GB's gas regulatory regime (including assimilated EU legislation) be impacted by the EU's own regulatory and policy plans for transitioning their energy system to net zero?

The EU is introducing extensive regulatory and policy measures to support its transition, including methane emissions standards and decarbonisation requirements. Cross-border

trade with the EU is likely to become increasingly important, so GB's regulatory regime should ensure compatibility and alignment where appropriate. Contradictory or misaligned measures could create barriers, increase compliance costs, and disrupt trading flows, reducing efficiency and undermining the benefits of interconnected markets.

**Question 38:** ~~Are there any other current regulations (not the upper limit of the Wobbe number or LNG terminal capacity) that may be acting as a barrier to investment, gas security, and/or affordability?~~

**Question 38a:** ~~Please demonstrate the impact of the regulation, and the likely impact of alternative arrangements.~~

**Question 39:** Are there any other aspects of GB's regulatory or market framework that could be a barrier to LNG being brought to GB where this is needed or impacting on our security of supply?

The GB gas market faces competitive disadvantages that threaten its ability to attract LNG supplies:

- NTS entry capacity charges are significantly higher than those in competing EU destinations; and
- GB Wobbe Index restrictions result in a requirement for LNG supplies to undergo costly gas treatment which is not required in EU destinations; and
- UK LNG terminals currently rely on submerged combustion vaporisers (SCVs) to regasify LNG having been prevented from using much cheaper and lower emissions open rack vaporisers, which utilise the heat in sea water. This puts UK terminals at a cost disadvantage, including the cost of the fuel and the associated carbon emissions, compared to LNG terminals in neighbouring countries which are allowed to use that technology.

Addressing these barriers will enhance GB's competitiveness, improve security of supply, and reduce costs for UK consumers.

**Question 40:** Do you have examples of when these barriers had an impact on LNG imports?

**Question 41:** To what extent would increasing the upper Wobbe limit address any of the three priorities set out in Chapter 2 (ensuring we have sufficient supply capacity to meet future demand; ensuring resilient supply capacity; and ensuring commercially viable supply capacity)?

Provided that safety standards are maintained, raising the upper Wobbe limit could significantly enhance supply flexibility, lower the costs of gas treatment, and support both system resilience and commercial efficiency.

**Question 42:** Would increasing the upper Wobbe Index limit strengthen GB's energy security and competitiveness in the global LNG market and, if so, why?

Yes, it could. Expanding the acceptable Wobbe range would ease operational constraints, reduce compliance costs where technically feasible, open up new sources of LNG supply, and make GB a more attractive for LNG imports.

**Question 42a:** What would be impact of making no changes to the upper Wobbe Index limit?

This would be a continuation of disadvantageous conditions with likely upward pressure on wholesale prices as a result.

**Question 43:** What impact would increasing the upper Wobbe Index limit have, particularly in relation to cost and operational burdens, for your organisation, whether positive or negative?

For traders, this would provide greater optionality, lower transaction costs, and make sourcing and managing LNG cargos simpler and more commercially attractive.

**Question 44: To what extent do you agree that current regulatory and market arrangements for LNG terminals are suitable for the future needs of the gas system?**

From a trader's perspective, current arrangements are generally adequate, but their effectiveness will depend on how expiring exemptions and regulated third-party access are implemented. The framework should maintain clear access rules, support efficient trading and flexibility, and preserve commercial incentives, particularly during periods of market stress.

**Question 45: How could HMG best support the continued effectiveness and adaptability of the regulatory and market framework for LNG terminals, if needed?**

The government should focus on **preserving market efficiency and flexibility** by ensuring clear and predictable access rules, supporting liquid trading, and avoiding ad hoc interventions.

**Question 46: ~~Are there any other areas of emerging regulation you believe government should monitor or engage with to support the existing commercial models in place within GB's gas sector?~~**

**Question 47: Would the introduction of an equivalent UK import standard be a viable route to managing the risks presented by the EU standard?**

Considering the considerable challenges posed by the very prescriptive requirements placed on importers and production on the EU side, we would strongly discourage the introduction of such a standard at this time, which would create a significant burden for UK businesses/importers. An equivalent standard in the sense of the EUMR would have to include domestic production and is neither needed or able to address the challenges set by the EU MR. Overall, consistent policies implemented in the UK and EU should simplify and encourage trade, support supply security and improve utilisation of the interconnectors.

**Question 48:** ~~If applicable, what Measurement, Reporting and Verification frameworks do you currently have in place and do you believe they meet EU requirements?~~

**Question 48a:** ~~If not, what do you think the main barriers are to your Measurement, Reporting and Verification frameworks meeting EU requirements?~~

The main barriers to comply with EU MER's requirements are:

1. Limited availability of OGMP 2.0 Level 5 production volumes globally
2. No formally recognized verification protocols that would enable third party verification
3. No third party verifier has been accredited in line with EU MER to carry out the audits of producers' MRV measures
4. Third party verifiers currently do not have sufficient number of expert personnel to conduct verification audits for all producers/assets globally
5. Importers are struggling to identify the producer of their imports and may not be able to report the data
6. Importers have limited powers to pass obligations placed upon them onto their suppliers

**Question 49:** ~~Do you consider it feasible to provide methane-related data for gas traded through virtual hubs, given the challenges of physical traceability, and how?~~

Providing methane-related data for gas traded via virtual hubs is highly challenging due to the commingled nature of global LNG and pipeline supplies, which makes tracing individual molecules to specific producers effectively impossible. The industry has, however, developed a proposed framework for addressing these "complex value chains" in line with the EU Methane Regulation. Details can be found here: "[Description of principles for solutions addressing the challenge for EU importers to identify the producer of natural gas or crude oil to achieve compliance with the EU Methane Regulation](#)"<sup>2</sup>.

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<sup>2</sup> "[Action plan to address key challenges on importers' requirements in the Methane Regulation](#)", 07/2025, Energy Traders Europe.  
"[Description of principles for solutions addressing the challenge for EU importers to identify the producer of natural gas or crude oil to achieve compliance with the EU Methane Regulation](#)", 10/2025, Energy Traders Europe.

**Question 50:** What are your views on the different options for addressing methane emissions from imported gas (e.g. mandated Measurement, Reporting and Verification requirements, certification schemes, and performance standards)?

See above.

**Question 51:** Are there any other alternative mitigations we have not named that could address the priority of ensuring a commercial model that works?

Incentivise demand for low methane emissions products.

## Contact

**Marlena Debora Mazura**

Gas Policy Advisor

[m.mazura@energytraderseurope.org](mailto:m.mazura@energytraderseurope.org)