CONSULTATION RESPONSE

Reflecting regional market integration in Dutch gas security of supply assessments

Energy Traders Europe response to GTS' consultation on Security of Supply 2026

Brussels, 06 August 2026 - Energy Traders Europe welcomes the opportunity to respond to the GTS consultation on the 2026 Security of Supply Assessment. We support a robust and transparent assessment of Dutch gas security of supply, provided that it reflects the functioning of integrated gas markets, increasing connectedness to global LNG markets, avoids overly conservative assumptions and recognises the contribution of cross-border flexibility and solidarity mechanisms.

Moreover, given that the Dutch gas market is so integral to the wider European market and that many market participants are not based in the Netherlands **we strongly urge GTS to publish all future reports in English to aid non-Dutch stakeholders.**

Key messages

1. **The assessment should better reflect market-based flexibility and realistic supply assumptions**
   The revised temperature methodology is a welcome improvement, but the central scenario should better capture seasonal LNG imports, global LNG market dynamics and realistic supply-side flexibility. Several assumptions remain unnecessarily conservative and risk overstating the Dutch storage requirement.
2. **Security of supply should be assessed from at least regional, if not EU-wide perspective**
   The Netherlands is part of an integrated regional gas market. Future assessments should therefore better reflect cross-border market integration, EU solidarity arrangements and regional developments when evaluating Dutch security of supply.
3. **Emergency strategic stocks are a better tool than storage-filling obligations, provided they are proportionate and clearly justified**
   Where government intervention is considered necessary to address clearly identified security-of-supply risks, a dedicated emergency reserve is generally less distortive than recurring storage-filling obligations.

Detailed comments

Energy Traders Europe welcomes that GTS has aligned the definition of a cold winter and peak demand event more closely with the EU Security of Supply framework. This improves consistency with the European regulatory framework and results in a more proportionate assessment of Dutch storage needs. The revised approach leads to a required storage volume of 103 TWh in the base case, which better reflects the EU's 1-in-20-year security of supply standard but remains excessive.

At the same time, several assumptions in the assessment remain overly conservative and may overstate the required national storage volume or understate the contribution of market-based flexibility. In particular, the treatment of LNG imports, cross-border flows, EemsEnergyTerminal availability, Grijpskerk capacity and future developments in Germany should be reconsidered:

Seasonal LNG imports and global LNG market connectedness should be reflected in the central scenario

LNG is a highly flexible source of supply. Through interconnected global LNG markets, cargoes are directed towards regions where demand and price signals are strongest. GTS explicitly recognises the importance of global LNG flows for Europe and the Netherlands and shows in its own sensitivity analysis that **assuming seasonal LNG imports reduces the required storage volume from 103 TWh to 83 TWh**. Given the increasing integration of North-West European gas markets with global LNG markets, seasonal LNG imports should form part of the central scenario rather than being treated solely as a sensitivity.

Accordingly, we believe that incorporating seasonal LNG imports into the central scenario would justify a lower required storage volume than the current base case.

Several assumptions remain overly conservative

Energy Traders Europe welcomes the more proportionate temperature assumptions but considers that several other assumptions are unnecessarily conservative.

In particular:

- The assumed unavailability of EemsEnergyTerminal during winter 2027/28 materially tightens both the capacity balance and the storage requirement. Given that EET have recently announced **its final investment decision (FID) to continue operations beyond 2027** and **has reportedly contracted around 70% of its capacity for 2028–2036**, the assumption that it will be unavailable **appears difficult to justify**.
- The treatment of Grijpskerk based on off-spec production capacity may understate the flexibility available in practice during large parts of the winter.
- The assumed increase in exports to Germany is not matched by a corresponding increase in Dutch import assumptions, creating an asymmetric treatment of demand and supply developments.
- The assumption that the UK will not provide additional LNG-related supply during tight winter conditions is insufficiently substantiated.
- Import assumptions from Belgium are conservative and inconsistent with the assumption that LNG flexibility can increase in response to seasonal demand.

Energy Traders Europe recommends that **GTS applies a more balanced approach between projected demand developments and realistic supply-side flexibility**.

Security of supply should be assessed from at least a North-West European perspective

The Dutch gas market is deeply integrated with neighbouring markets through cross-border infrastructure, LNG terminals, storage facilities and trading activity. Security of supply in the Netherlands should therefore not be assessed in isolation. In this context the EU Security of Supply Regulation has established a legally binding solidarity mechanism under which Member States must provide gas to protected customers in neighbouring Member States during severe emergency situations.

As the consultation places significant emphasis on future gas flows between the Netherlands and Germany, including increasing exports from the Netherlands to Germany, it should also consider the impact of the announced development of a 24TWh emergency gas reserve in Germany (expected to be at least partially in place before GY2027 with full implementation expected before GY2029). Future Dutch Security of Supply assessments should consider the extent to which this reserve may strengthen regional resilience and security of supply within the wider North-West European gas market.

Any additional emergency strategic stock should be proportionate, transparent and well justified

Within the assessment, GTS refers to the role of an emergency strategic stock in strengthening Dutch security of supply. Energy Traders Europe agrees that, where public intervention is considered necessary to address a clearly identified and evidenced security-of-supply risk, a **dedicated emergency reserve is generally <u>less distortive</u> than recurring storage-filling obligations**. This is consistent with the principle that commercial storage decisions should, as a general rule, remain market-based.

The current Dutch and European regulatory framework already provide a range of instruments to safeguard security of supply (i.e., commercially operated storage facilities, import infrastructure, cross-border interconnection, etc.). In addition, the Netherlands already maintains an emergency strategic stock of approximately 5 TWh. **Any conclusion that additional strategic stock is required should therefore be supported by an assessment demonstrating why existing measures are insufficient**.

An emergency reserve that is larger than objectively required could crowd out commercial storage, reduce market liquidity, weaken price signals and ultimately increase costs for consumers. For this reason, any strategic reserve should remain strictly proportionate to specific residual risks and should only be considered if those risks cannot be managed through the existing market and regulatory framework. Moreover, to minimise market distortion, there should be clearly understood rules around the triggering and use of emergency strategic stock.

CONSULTATION RESPONSE

Recommendations

Energy Traders Europe recommends that GTS:

- Maintains the revised EU-aligned temperature methodology as the basis for future assessments.
- Includes seasonal LNG imports and the increasing connectedness of global LNG markets in the central scenario rather than only as a sensitivity.
- Reviews conservative assumptions on EemsEnergyTerminal, Grijpskerk, UK flows, Belgian imports and German export projections.
- Applies a more consistent approach between projected demand increases and realistic supply-side flexibility.
- Further develops the North-West European perspective in Dutch security of supply assessments.
- Explicitly reflects German strategic reserve developments and their availability under EU solidarity arrangements in future analyses.

We would welcome the opportunity to discuss these comments further.

Contact

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