FACTUAL SUMMARY REPORT ON THE PUBLIC CONSULTATION – ENERGY SECURITY FITNESS CHECK

DISCLAIMER: THE VIEWS PRESENTED IN THIS FACTUAL SUMMARY REPORT ARE NOT THE VIEWS OF THE EUROPEAN COMMISSION, BUT THOSE OF THE STAKEHOLDERS THAT PARTICIPATED IN THIS PUBLIC CONSULTATION. IT CANNOT UNDER ANY CIRCUMSTANCES BE REGARDED AS THE OFFICIAL POSITION OF THE COMMISSION OR ITS SERVICES.

Objectives and approach of the consultation

The public consultation was one of the main activities that had been identified in the consultation strategy agreed with the energy security Inter-service Group (ISG) in July 2024. It was open from 3 September 2024 until 26 November 2024, together with a call for evidence. The purpose was to proactively seek evidence and to gather information from a wide range of stakeholders and citizens about the functioning of the current EU energy security architecture, with a particular focus on gas and electricity sectors. Other consultation activities have been carried out in parallel, which will be further detailed in the final fitness check report.

The public consultation questionnaire comprised a total of 123 questions, structured in five sections:

- Section 1: Information about respondents;
- Section 2: General questions on energy security;
- Section 3: Specific questions on energy security framework;
- Section 4: Specific questions on gas security of supply;
- Section 5: Specific questions on electricity security of supply.

The section concerning general energy security questions (Section 2) targeted all respondents of the questionnaire. However, the respondents had the possibility to choose whether to respond to any of the following sections (Sections 3-5). The questionnaire included a mix of both closed (to evaluate a set of pre-defined existing provisions) and open questions (to eliminate possible biases or information gaps). The latter also allowed stakeholders and citizens to provide their views on the overall functioning, direction and future priorities of the energy security framework.

An effort was made to raise awareness of this consultation among stakeholders and the general public, beyond the sole publication on the Europa website. The Commission advertised it by the means of several publications on social networks[1] and of presentations to various audiences.

This document provides a short factual summary of the responses to the public consultation. All the quantitative analysis has been performed by European Commission's Joint Research Centre. However, it should be noted that this public consultation is not a representative survey, and the

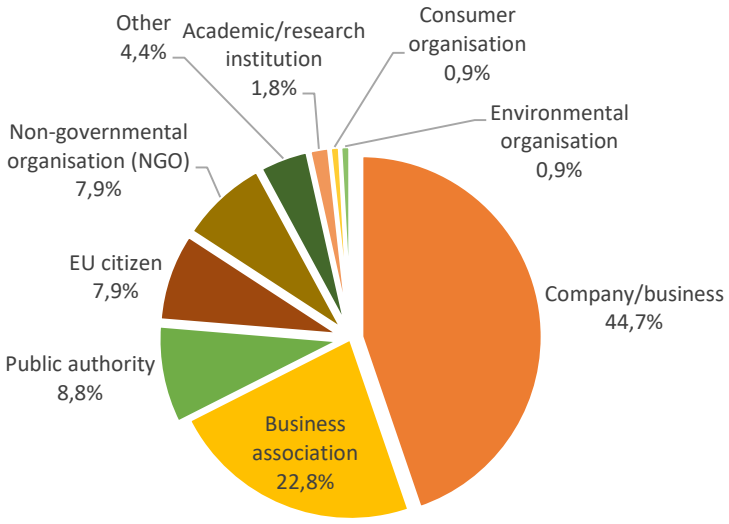
[1] E.g., on Twitter on 17 October (https://x.com/Energy4Europe/status/1846809954205708611) and 9 November (https://x.com/Energy4Europe/status/1855251496578757106).

data presented in this report needs to be used accordingly. A full analysis of all consultation activities results will be included in the final fitness check report.

Section 1. Information about respondents

A total of 114 stakeholders responded to the Public Consultation[2]. Companies or businesses made up the largest proportion of respondents, with 51 submissions (44.7%). This was followed by 26 submissions from business associations (22.8%) and 10 from public authorities (8.8%). EU citizens and non-governmental organisations each submitted 9 questionnaires (7.9%). A much smaller number of contributions were received from academic/research institutions (2), consumers (1) and environmental organisations (1). Five submissions were received from other entities. No contributions were provided by non-EU citizens and Trade Unions.

Figure 1. Contributions received by category of stakeholders



Source: JRC 2024

Out of the 114 respondents, 105 are organisations. Around 50% are large organisations, 14.3% are medium-size organisations, 18.1% are small and 16.2% are micro-organisations.

[2] One submission was sent through the call for evidence and was therefore manually added to the pool of responses for the analysis. This is the reason why the 'Have Your Say' portal shows a total of only 113 responses received.

Table 1. Size of responding organisation by category of respondents.

	Organisation size				
Category of respondent	**Micro (1 to 9 employees)**	**Small (10 to 49 employees)**	**Medium (50 to 249 employees)**	**Large (250 or more employees)**	***Unknown***
Academic/research institution	1	1	0	0	0
Business association	11	12	1	1	1
Company/business	0	0	8	43	0
Consumer organisation	0	0	0	1	0
Environmental organisation	1	0	0	0	0
Non-governmental organisation (NGO)	2	5	2	0	0
Public authority	0	0	2	8	0
Other	2	1	2	0	0
Total	**17**	**19**	**15**	**53**	**1**

Source: JRC 2024

In terms of country of origin, 106 out of the 114 were from the EU-27. The remaining responses came from the United States (3), Ukraine (2), and Norway, Switzerland, and the United Kingdom (1 each). Belgium had the highest number of responses from the EU-27, with 28. This is because most of the responding business associations (17 out of 26) and NGOs (5 out of 9) are based in Belgium. Germany had the second highest number of responses, with 15, of which 10 were from companies or businesses.

Of the 114 respondents, the vast majority (99) stated they were active in the energy sector. Most respondents were active in the **gas** (60 respondents) and **electricity** (56 respondents) sectors. Sixteen respondents were also active in the **oil** sector, while 31 selected other sectors. These included **hydrogen**, **energy efficiency and savings**, and **district heating**.

Regarding the segment of activity, around 23 out of 114 were Transmission System Operators, while 12 declared to be Public Authority. A significant number of respondents (51) selected "Other". This was often because organisations were involved in multiple activity segments throughout the energy value chain but could only choose one option in the public consultation questionnaire. Other respondents included manufacturing companies, IT, equipment and service providers, think tanks, and civil society organisations.

Section 2. General questions on energy security

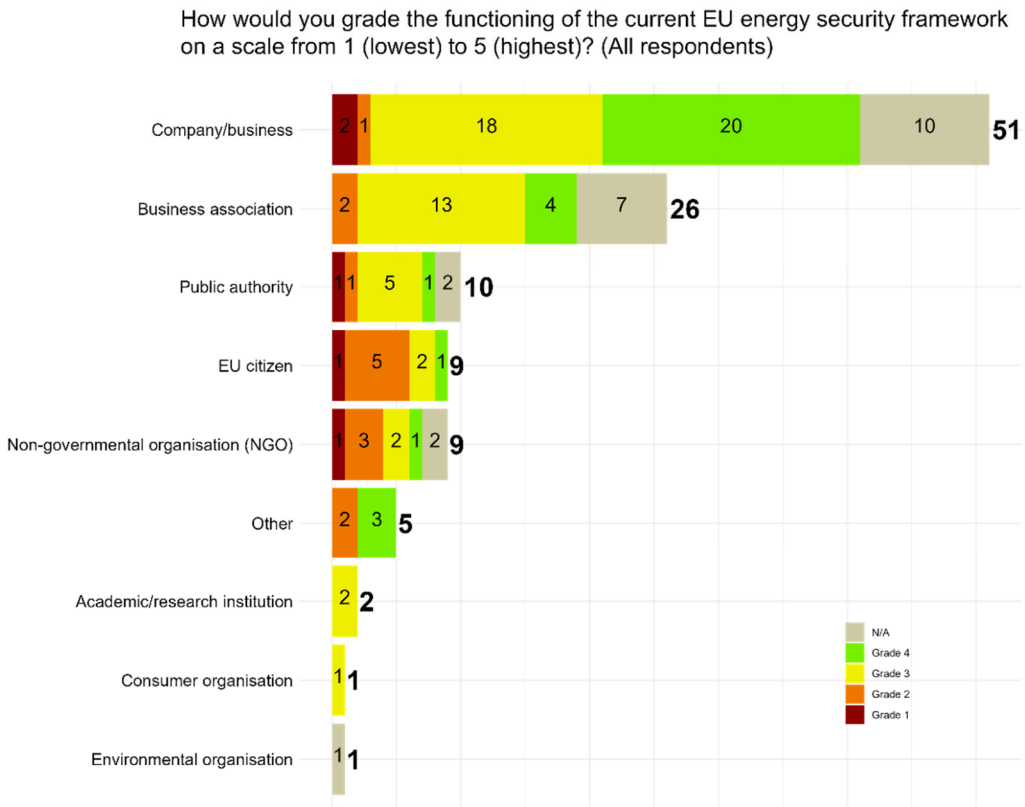
All the 114 survey respondents were asked the general questions on energy security. When asked to grade the functioning of the current EU energy security framework on a scale from 1 (lowest) to 5 (highest), 92 provided an answer. The majority of respondents (43; 37.7%) had a neutral opinion providing a grade 3, while 30 respondents (26.3%) expressed a positive opinion by providing a grade 4. None of the respondents gave the maximum grade 5. 19 respondents (around 17%) had a negative opinion of the functioning of the current EU energy security framework (grades 1 and 2).

Looking at the type of stakeholder, the current EU energy security framework is seen favourably (grade 4) by almost 40% of the responding companies/businesses (20 out of 51), while only 4 out of 26 business associations and 1 public authority out of 10 gave a positive grading. Half of the business associations (13 out of 26) and most of the public authorities (5 out of 8) expressed a neutral opinion and provided a grade of 3.

Most of the respondents that provided a grade 3 or 4 recognised **the robustness of the energy security framework and acknowledged the resilience of the energy system** especially in the face of the recent events (COVID pandemic and 2022-2023 energy crisis). However, the respondents pointed out to the necessity of revising the current framework to address several challenges mainly related to the **need for increased regulatory harmonization across national and EU levels** to prevent fragmentation and foster a stronger, more cohesive energy market. A significant concern is the framework's **over-reliance on fossil fuels**, which not only exposes the EU to geopolitical risks and price volatility but also underscores the ongoing dependence on energy imports, which increases vulnerability.

Another critical challenge identified is the framework's insufficient focus on structural measures to reduce energy and gas demand, which is essential for achieving long-term climate neutrality and reducing reliance on volatile imports. The respondents also highlighted the **need to enhance sector integration**, which could lead to improved energy efficiency and system flexibility. Additionally, **the framework is perceived as overly reactive**, often addressing crises post-occurrence rather than proactively preventing them. The respondents remarked the need of establishing **EU-wide reserves**, particularly in gas, to mitigate supply disruptions and stabilize the market. Furthermore, several respondents indicated that the framework needs to address **cybersecurity threats** more comprehensively, as existing measures are deemed inadequate for protecting critical infrastructure. Finally, respondents called for substantial **investments in modernizing and expanding energy infrastructure**, including interconnectors and hydrogen systems, to ensure long-term security and support the integration of renewable energy sources. Enhanced energy storage strategies are also crucial for boosting resilience and encouraging technology deployment and investment.

Figure 2. Grading of the functioning of the current EU energy security framework provided by category of stakeholders.



Source: JRC, 2024

One of the primary concerns expressed by the respondents who provided a low grade (1 and 2) to the functioning of the current EU energy security framework is the **EU's continued dependence on fossil fuels, which makes it vulnerable to geopolitical crises and price volatility.** The lack of a common attitude among Member States regarding energy supply was considered to exacerbate this issue. The EU's reliance on fossil fuels is considered not only unsustainable but also hampering investments in renewable energy.

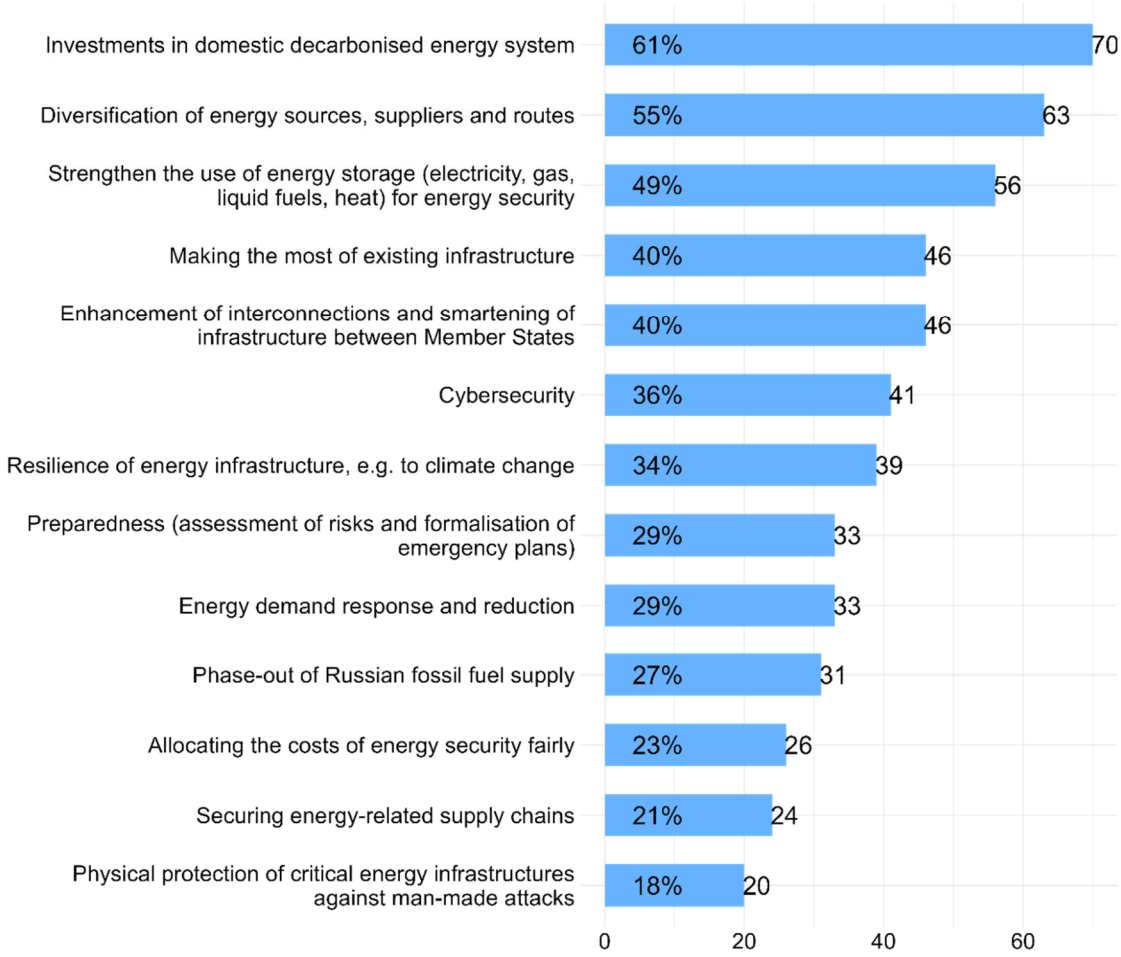
At the same time, some respondents were **concerned about the high energy prices on consumers** that resulted from the EU policies to reduce energy dependence on Russian gas as a result of the unprovoked invasion of Ukraine. Furthermore, the EU's energy security **framework is considered not sufficiently suited to address the impacts of climate change and the challenges of the energy transition.**

According to the respondents, a comprehensive approach is required and should include the development of clean tech manufacturing within the EU, to reduce dependence on geopolitical competitors and achieve Europe's decarbonisation targets. Also, the growing dependence on clean technology manufacturing from non-EU suppliers (such as China) raises **cybersecurity** concerns.

In the respondents' views, a revision of the current EU's energy security framework is necessary to address these concerns. Strengthening the role of **domestically produced renewables**, **flexibility**, and **energy sufficiency** and **efficiency** are considered important. The revised framework should also consider **climate mitigation and adaptation measures**, and focus more on **energy consumption reduction measures**.

Respondents were asked to select up to five objectives that they consider to be the most important for the EU energy security architecture. All 114 respondents provided replies.

Figure 3. Top-selected objectives of the EU energy security architecture (number and % of respondents)



Source: JRC, 2024

The survey identifies that the primary objective is to accelerate the **investments into a domestic decarbonised energy system**, with a significant majority (61%) of respondents highlighting this as a cornerstone for achieving energy independence and meeting climate goals. This involves substantial investment in renewable energy sources, along with the development of infrastructure necessary for electrification. Closely following this priority is the **diversification of energy sources, suppliers, and routes**, supported by 55% of respondents. This diversification is seen as essential for creating a resilient energy system that can withstand disruptions. It involves

forming new partnerships with reliable trade partners and integrating a broader energy mix, including both renewables and domestic resources.

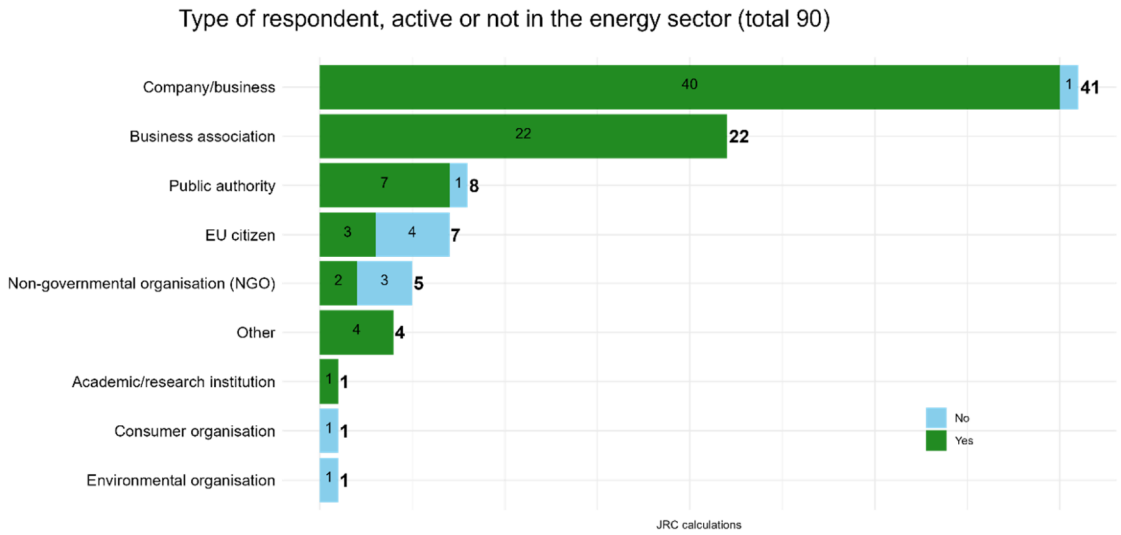
There is a strong call for **strengthening energy storage solutions,** with 49% backing increased investment in technologies like batteries and pumped hydro to effectively balance supply and demand and provide backup power during peak periods. Furthermore, **enhancing interconnectivity and digital infrastructure** between Member States, supported by 40% of respondents, is seen as vital for improving grid efficiency and integrating renewable energy at scale. Lastly, the **efficient use of existing infrastructure**, also supported by 40%, aims to repurpose and upgrade current systems like gas networks and electricity grids to accommodate renewable energy and new technologies such as hydrogen.

In the following, we discuss the options that received less than 40% of the respondents' votes. **Enhancing cybersecurity**, supported by 36%, is crucial as digitalisation increases, necessitating robust frameworks to protect energy systems from cyber threats. **Improving the resilience of energy infrastructure** against climate change, backed by 34%, calls for the need for better planning to withstand extreme weather events. **Preparedness**, also at 34%, focuses on developing comprehensive risk assessments and emergency plans for energy disruptions. **Energy demand response and reduction**, supported by 29%, stresses the importance of efficiency improvements to reduce dependency on volatile supply chains. Lastly, **phasing out Russian fossil fuel supply**, with 27% support, remarks the urgency of reducing reliance on Russian energy to bolster security, while **fair cost allocation** (23%), **securing energy-related supply chains** (21%), and the **physical protection of critical energy infrastructure** (18%) highlight the importance of equitable, resilient, and protective measures in the EU's energy framework.

Section 3. Specific questions on energy security framework

Out of 114 respondents, only 90 chose to answer the specific questions on energy security framework. The type of respondents is described in Figure 4; out of the 90 contributors, 79 are active in the energy sector, while 11 are not. Participants that dropped out are primarily citizens and NGOs.

Figure 4. Type of respondents in Section 3: specific questions on energy security framework

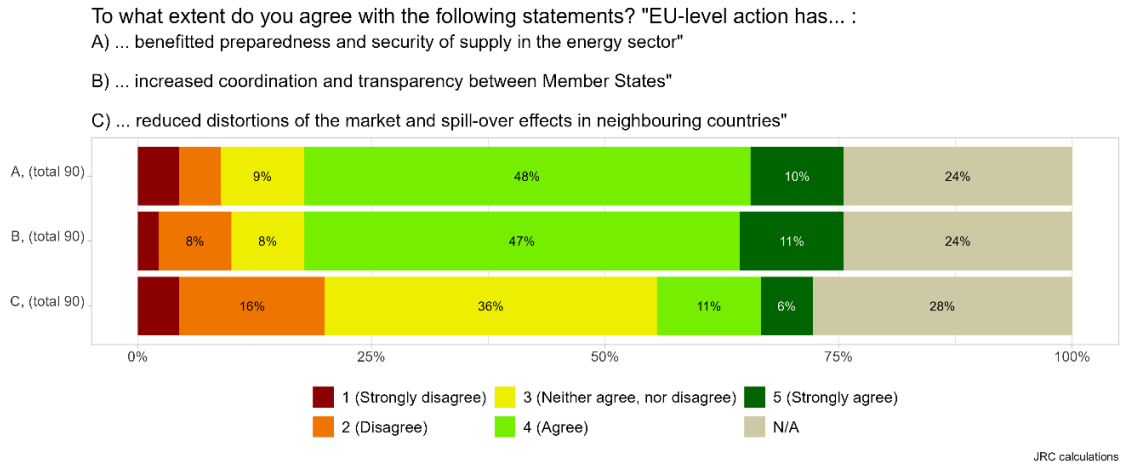


Source: JRC, 2024

The survey results indicate a **generally positive perception of EU-level actions concerning preparedness and security of supply** in the energy sector, with 57.8% of respondents (52 out of 90) agreeing or strongly agreeing that these actions have been beneficial. A small minority, 8.8%, disagreed/strongly disagreed, while a notable 24.4% abstained, indicating some uncertainty or lack of opinion on the matter.

Similarly, **EU-level actions are viewed favourably in terms of increasing coordination and transparency** among Member States, with 56.8% (43 out of 90) expressing agreement or strong agreement. However, 10% disagreed, and again, 24.4% did not respond, suggesting room for improvement in communication or perceived effectiveness.

Figure 5. EU-level action evaluation in the framework of energy security

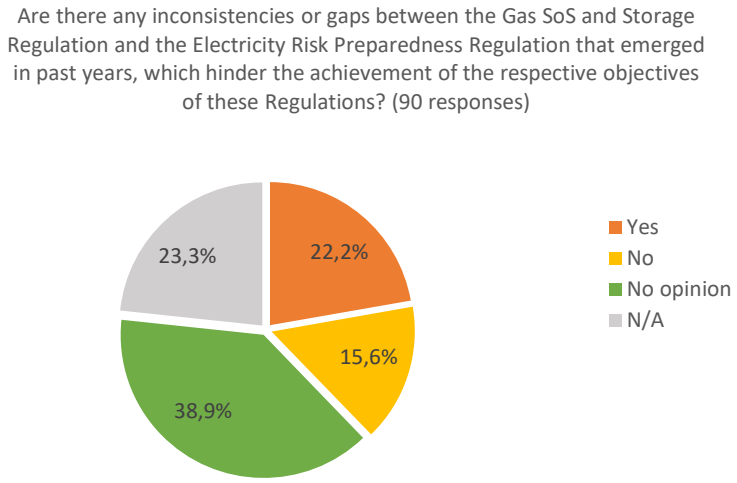


Source: JRC 2024

By contrast, the perception of EU-level action's impact on **reducing market distortions and spill-over effects in neighbouring countries** is less favourable. Only 16.7% of respondents agreed that such actions have been effective, while the largest group, 35.6%, neither agreed nor disagreed, reflecting a significant level of ambivalence or uncertainty. Additionally, 27.8% did not provide a response, indicating a possible lack of clarity or understanding regarding the EU's role in addressing these complex market issues. This highlights an area where further efforts might be needed to enhance the perceived effectiveness and awareness of EU actions in mitigating market-related challenges.

In response to the survey question regarding **potential inconsistencies** or gaps between the Gas Security of Supply and Storage Regulation and the Electricity Risk Preparedness Regulation, **opinions among the 90 respondents varied**. A segment of the participants, 20 respondents out of 90 (22.2%), expressed the belief that inconsistencies have indeed emerged in recent years, and might be hindering the effective achievement of the regulations' objectives.

Figure 6. Inconsistencies between the Gas Security of Supply and Storage Regulation and the Electricity Risk Preparedness Regulation



Source: JRC 2024

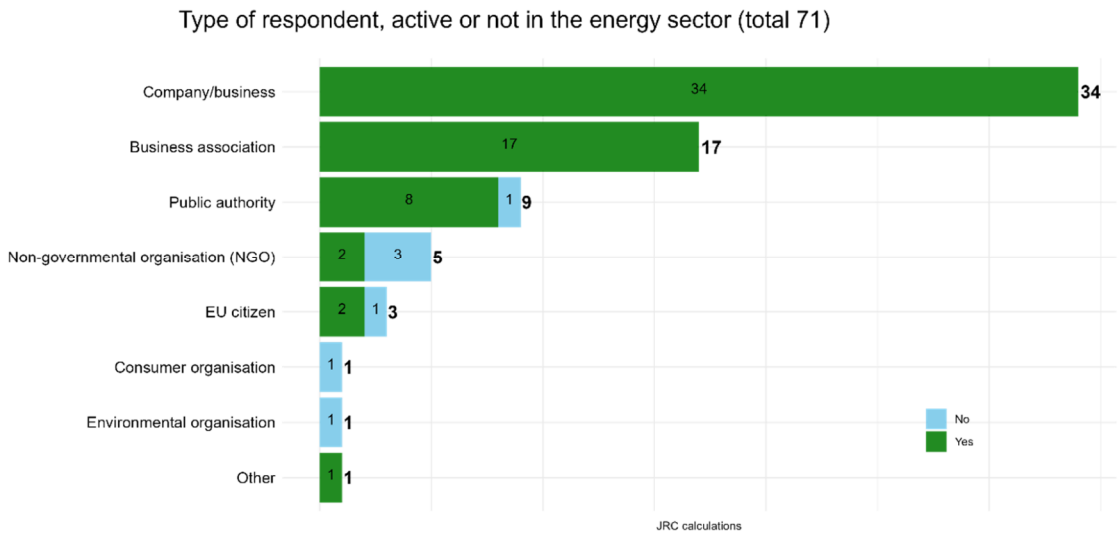
Conversely, 14 respondents (15.6%) disagreed with this view, indicating a belief that the regulations are consistent and complementary.

A significant portion of the respondents, 35 individuals (38.9%), did not express a specific opinion on the matter. Additionally, 21 respondents (23.3%) did not provide a response, which could reflect either a lack of awareness or interest in the topic, or a hesitancy to comment.

Section 4. Specific questions on gas security of supply

Out of 114 respondents, 71 chose to answer the specific questions on gas security of supply. The type of respondents is described in Figure 7. Out of the 71 contributors, 64 are active in the energy sector, while 7 are not.

Figure 7. Type of respondents in Section 4: specific questions on gas security of supply



Source: JRC 2024

In evaluating the performance of Regulation (EU) 2017/1938, the survey respondents provided insights into how effectively the regulation meets its objectives related to gas supply security in Europe. Of the 71 respondents, a notable portion did not respond to the question regarding the regulation's performance, with non-response rates ranging from 18% (13 respondents) to 23% (16 respondents), suggesting some level of uncertainty or lack of familiarity with the Regulation's impact.

For objectives A and C in Figure 8—securing adequate preparedness for gas supply disruptions and enhancing regional and EU-wide cooperation—between 46% (33 respondents) and 50% (36 respondents) rated the regulation's performance as good or excellent. This indicates a **reasonable level of satisfaction with how the regulation is perceived to assess risks, ensure sufficient infrastructure, and foster collaboration** across regions and the EU, particularly in times of supply emergencies.

However, when it comes to objective B in Figure 8, which focuses on safeguarding an uninterrupted gas supply to protected customers, only 22 out of 71 respondents rated the performance as at least good. This lower rating suggests that respondents may perceive **gaps or challenges in the regulation's effectiveness** in implementing necessary measures **to ensure continuous gas supply** to priority sectors or customers.

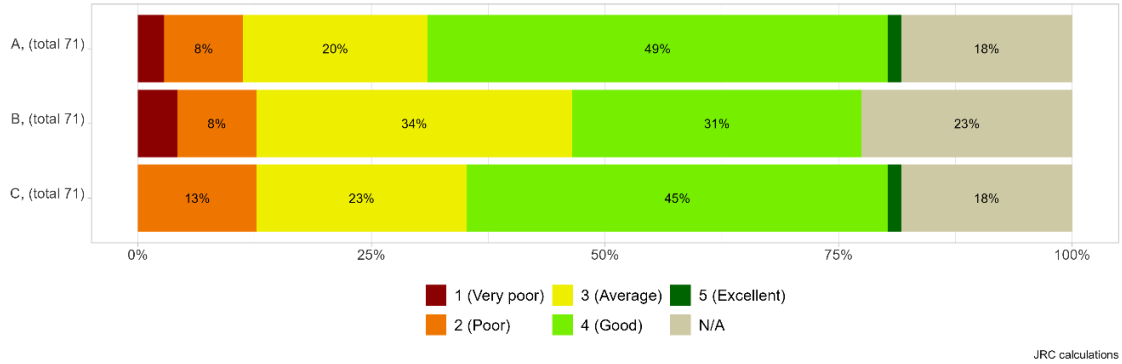
Figure 8. Performance of several objectives of the Regulation (EU) 2017/1938

Regulation (EU) 2017/1938 pursues several objectives. How would you grade its performance on the following objectives? :

A) Secure an adequate level of preparedness in Europe for gas supply disruptions, e.g. through assessing risks and sufficient infrastructure

B) Ensure that all necessary measures are taken to safeguard an uninterrupted supply of gas, in particular to protected customers

C) Enhance regional and EU-wide cooperation, including in times of supply emergencies

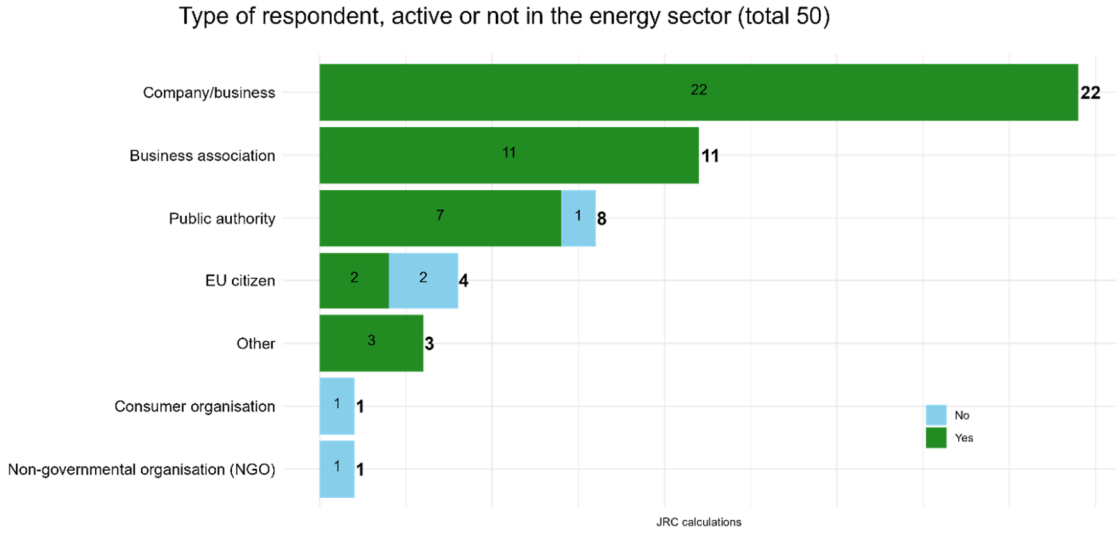


Source: JRC 2024

Section 5. Specific questions on electricity security of supply

Out of 114 respondents, 50 chose to answer the specific questions on electricity security of supply. The type of respondents is described in Figure 9; out of the 50 contributors, 45 are active in the energy sector, while 5 are not.

Figure 9. Type of respondents in section Specific questions on electricity security of supply.



Source: JRC 2024

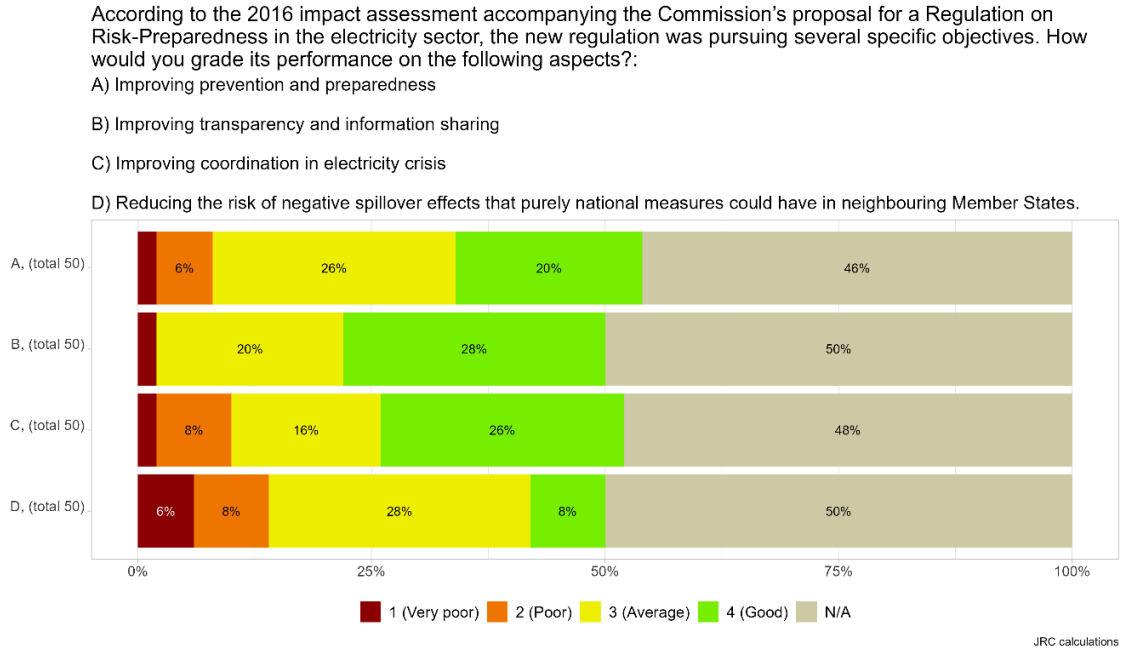
The survey responses provide insight into how the Regulation on Risk-Preparedness in the electricity sector is perceived in terms of its performance on specific objectives. Among the 50 respondents, a significant portion, ranging from 46% to 50%, did not answer the questions regarding these objectives, indicating either a lack of familiarity with the regulation's effects or uncertainty about its impact.

Regarding the performance on **improving coordination during electricity crises** (aspect C in Figure 10) and **enhancing transparency and information sharing** (aspect B Figure 10), 26% (13 respondents) and 28% (14 respondents), respectively, rated these aspects as good. This suggests a **moderately positive level of satisfaction** with the Regulation's ability to foster better communication and coordination among stakeholders during electricity emergencies.

In contrast, fewer respondents rated the performance as good for improving prevention and preparedness (aspect A in Figure 10) and reducing negative spillover effects from national measures on neighbouring Member States (aspect D), with only 20% (10 respondents) and 8% (4 respondents) expressing a positive view. Notably, no respondents rated any of the aspects as excellent, indicating room for enhancement across all areas of the regulation.

Overall, the feedback highlights the need for continued efforts to strengthen the regulation's impact on risk preparedness and cross-border cooperation in the electricity sector.

Figure 10. Performance of aspects of the Commission's proposal for a Regulation on Risk-Preparedness in the electricity sector



Source: JRC 2024