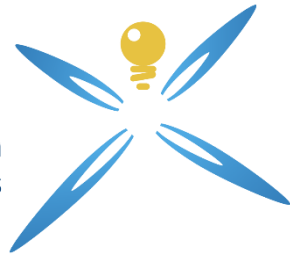


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Regulators' reflections on enabling the injection and access to the wholesale market of biomethane

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Access of biomethane to the wholesale market

[Recital 113 Gas Regulation
Articles 39 and 44 Gas Directive]

Connection fees and costs for biomethane production facilities

[Article 58 Gas Directive]

Tariff discounts for biomethane

[Article 18 Gas Regulation]

Trading of biomethane

[Article 16 and Annex I Gas Directive
Articles 19 and 29 REDIII]

➔ Overview of how nine EU Member States are implementing key provisions of the Gas Decarbonisation Package relevant to biomethane

- **Main finding:** Multiple workable models exist to integrate distribution-level biomethane into the wholesale market.
- Different concepts are applied:
 - **Integrated market areas** (e.g. AT, DE, IT, LV, PT): direct access to VTP at both transmission & distribution level through an integrated balancing zone
 - **Virtual entry points** (e.g. DK): distribution-level injected biomethane can be virtually injected into the transmission level and then traded at wholesale level
 - **Indirect access** (e.g. FR): offtake via “buyer of last resort” obligation gives indirect access to wholesale market

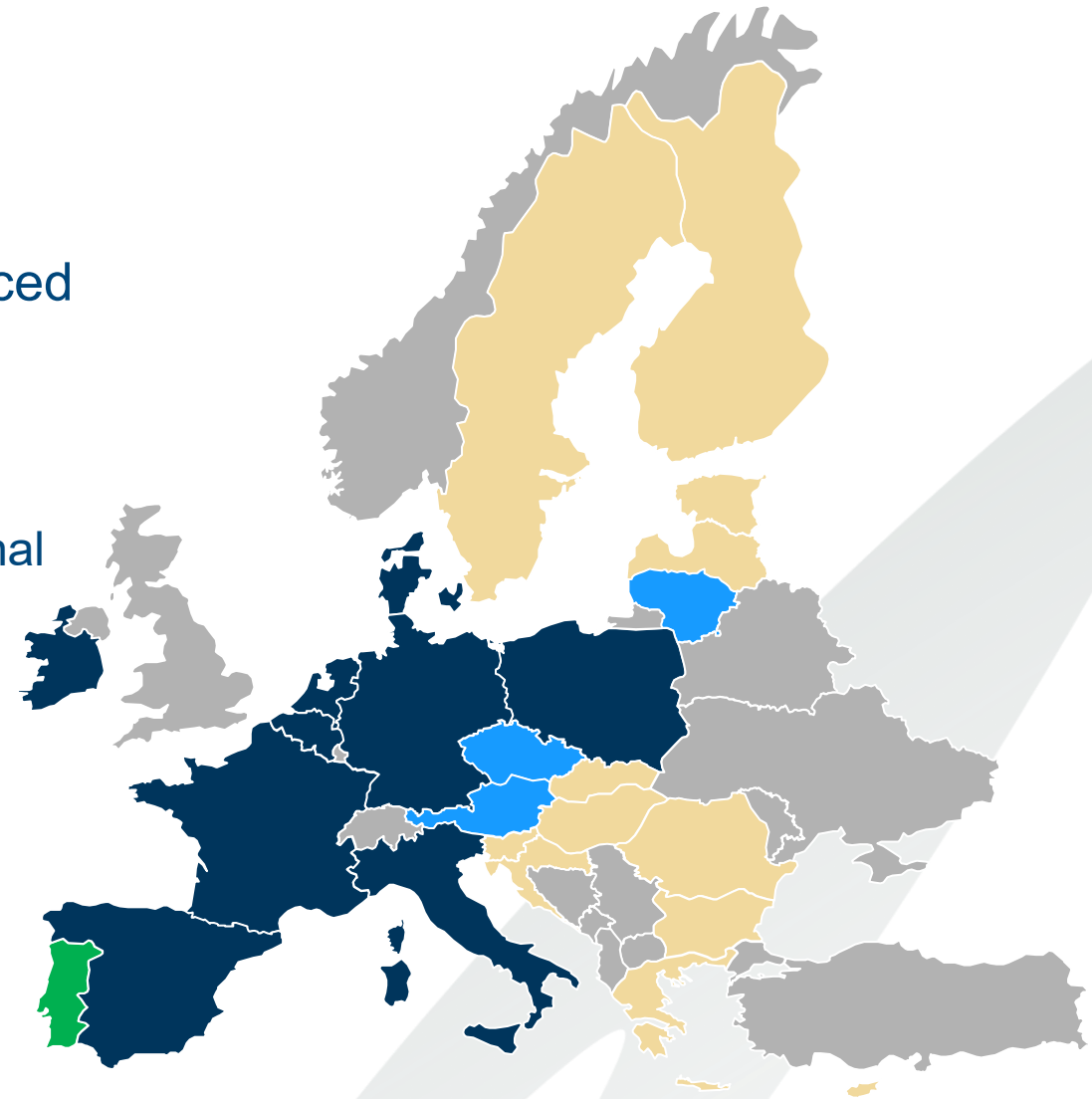
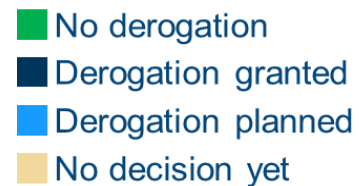


- **Main finding:** cost-sharing models are applied in most Member States
- **Cost-sharing models**
 - DK, PT: producers cover most connection costs (pipelines, compressors, metering)
 - AT, DE, FR, IT, LV, CZ producers pay part of project-specific costs:
 - FR: 40% producer / 60% socialised ($\leq 600\text{k€}$)
 - IT (DSO): 80% producer / 20% socialised
 - DE: 25% producer / 75% operator (distance caps)
 - CZ: case-specific (capacity & distance)
 - LV: producer pays pipeline, TSO pays injection facilities
 - AT: full socialisation if $\leq 60 \text{ m/m}^3\text{CH}_4\text{eq/h}$
- **System-level reinforcements** (e.g. reverse flow and meshing)
 - Usually covered by network operators and fully socialised
- **Mapping tools** (AT, FR, IT) guide optimal injection points
- **Shared connection points** for multiple plants can cut costs

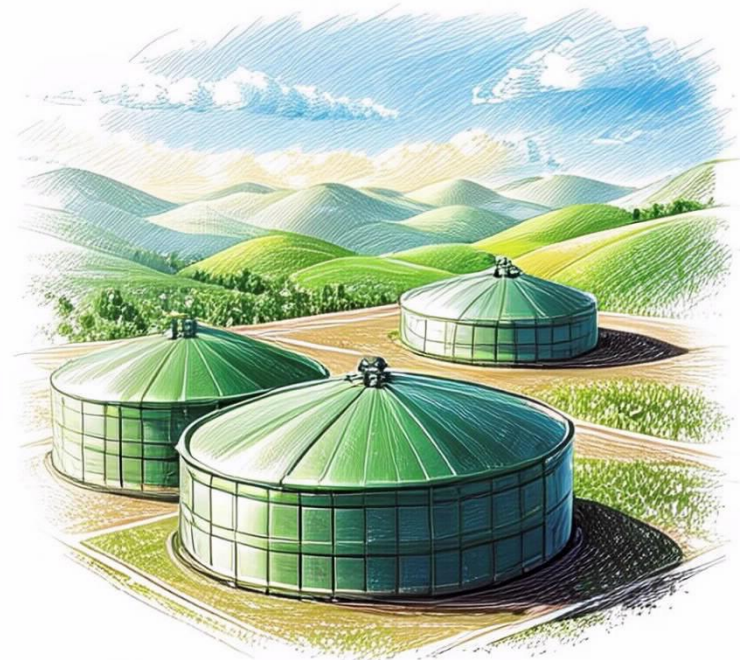


- **Main finding:**

- Several derogations so far
- Most derogations based on Art. 18(5b): advanced rollout or alternative support scheme
- Some MS still evaluating
- Implementation challenge:
 - PoS certification systems not yet fully operational



- **Main finding: Tariff discounts at biomethane entry points (mainly DSO level)**
 - Very low tariffs: AT, CZ
 - 100% discount: LV, PT, IT (DSO)
 - No discount: DK, FR → offset by national support schemes
- **Result:** Fragmented application of tariff discounts across Member States, subject to different stages of biomethane sector development and alternative support schemes



- **Main finding**

- Different types of gas certification schemes exist
 - Guarantees of Origin (GOs) schemes for disclosure towards end customers
 - Proof of Sustainability (PoS) for compliance with achieving EU targets under RED II
- Several Member States have already established national gas GO schemes while implementation is pending in some Member States

- **Facilitating cross-border biomethane trade and market integration**

- Integrated and harmonized handling of GOs and PoS within the national GO registries and the Union Data Base (UDB)



Thank you



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