

**From:** [REDACTED] (CAB-VON DER LEYEN)  
**Sent:** lundi 10 janvier 2022 17:35  
**To:** [REDACTED] (CAB-VON DER LEYEN)  
**Subject:** FW: COM proposal of a Complementary Delegated Act - Evaluation of Gas Activities  
**Attachments:** [REDACTED] - Draft Taxonomy Complementary DA - Gas activities - Modification proposal.pdf

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**From:** [REDACTED] >  
**Sent:** Friday, January 7, 2022 5:41 PM  
**To:** [REDACTED] (CAB-VON DER LEYEN) <[REDACTED]@ec.europa.eu>  
**Cc:** [REDACTED] >; [REDACTED] >  
**Subject:** COM proposal of a Complementary Delegated Act - Evaluation of Gas Activities

Dear [REDACTED],

At the end of last year, the European Commission published the draft Complementary Delegated Act for the EU Taxonomy. This document recognises the contribution of gas power generation – both as power-only and cogeneration installations – as an essential contributor in the transition towards a climate-neutral energy system and society. In the longer term, gas power plants will provide climate-neutral energy thanks to the use of renewable and low-carbon gases, or in combination with the Carbon Capture Use and Storage technologies.

[REDACTED] and [REDACTED], the European associations representing the [REDACTED] welcome the inclusion of gas power generation in the draft complementary DA. However, there are some aspects that should be amended in the final text in order to adequately recognise the role of gas power generation and fully benefit from its contribution to a decarbonised and integrated energy system. The three main points are:

**Recognising the contribution to system reliability and grid stability**

The replacement of coal installations is an important step to support a fast overall GHG emission reduction. Unfortunately, the draft ignores the other key contribution of gas power plants to the energy transition: Gas power plants enable the further build-up of renewable energy, while ensuring the stability of the electricity grid and security of supply. This is an increasingly important role as more intermittent renewables are introduced into the energy system. However, the proposal lacks the recognition of the role of gas power plants as back-up to enable more intermittent renewables in the system. **The technical screening criteria should include the use of gas power plants as back-up in addition to coal-to-gas switching.**

**Acknowledging the trend towards decentralisation**

Given the trend towards a decentralisation of the energy system and the fact that coal-fired power plants are very large installations, **it should be acknowledged throughout**

**the technical screening criteria that the replacement may be made by several, smaller facilities** in aggregate.

**Aligning the ambitions for the use of renewable and low-carbon gases**

The compatibility with the co-firing of low-carbon and renewable gases is an important feature, which can be ensured with the equipment of our members – guaranteeing that investments are future-proof. However, **the proposed timeline and %-shares deviate from the evolution communicated in the EU Gas Decarbonisation & Hydrogen package** (see the graph from the European Commission's [Fact Sheet](#)) and published national plans on the decarbonisation of gas networks.

A full switch to renewable or low-carbon gases will depend on their availability – and at the moment is not clear that this will happen in the same timeframe as the implementation of the DA. Therefore, meeting the timeline and % share of renewable and low-carbon gases requires a commitment of the EU and Member States to provide the necessary gases in time, as well as periodic reviews and adjustments to the DA to reflect reality (see suggested new Article 2a).

**A document with a more comprehensive evaluation and concrete proposals for modifications is attached.**

We hope you can share our considerations and would appreciate, if you would take them into account when finalising the Complementary Delegated Act.

Should you have questions, please do not hesitate to contact us.

Kind regards,

[Redacted signature]

[Redacted signature block]

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