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**COMMISSION IMPLEMENTING REGULATION (EU) .../...**

**of **XXX****

**setting the filling trajectory with intermediary targets for 2025 for each Member State with underground gas storage facilities on its territory and directly interconnected to its market area**

# COMMISSION IMPLEMENTING REGULATION (EU) .../...

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**setting the filling trajectory with intermediary targets for 2025 for each Member State with underground gas storage facilities on its territory and directly interconnected to its market area**

THE EUROPEAN COMMISSION,

Having regard to the Treaty on the Functioning of the European Union,

Having regard to Regulation (EU) 2017/1938 of the European Parliament and of the Council of 25 October 2017 concerning measures to safeguard the security of gas supply and repealing Regulation (EU) No 994/2010<sup>1</sup>, as amended by Regulation (EU) 2022/1032 of the European Parliament and of the Council of 29 June 2022, and in particular Article 6a(7), third subparagraph, thereof,

Whereas:

- (1) Following the Russian military aggression against Ukraine and in the face of the possibility of a protracted disruption or even a halt of gas supplies from Russia, the European Union undertook initiatives to increase its preparedness against such disruptions, in order to protect its citizens and its economy.
- (2) In this context, Regulation (EU) 2022/1032<sup>2</sup> of the European Parliament and of the Council was adopted with a view to ensure the filling of Member States' underground gas storage facilities for the winter period of 2022-2023 and beyond, by amending Regulation (EU) 2017/1938.
- (3) As for 2023 and following years, sub-paragraph 1 of Article 6a(7) of Regulation (EU) 2017/1938 provides that each Member State with underground gas storage facilities must submit to the Commission, by 15 September of the previous year, a draft filling trajectory with intermediary targets for February, May, July and September, including technical information, for such facilities on its territory and directly interconnected to its market area in an aggregated form. The filling trajectory and the intermediate targets shall be based on the average filling rate during the preceding five years.
- (4) Sub-paragraph 3 of Article 6a(7) of Regulation (EU) 2017/1938 stipulates that, based on the technical information provided by each Member State and taking into account the assessment of the Gas Coordination Group (the 'GCG'), the Commission must adopt implementing acts setting the filling trajectory for each Member State by 15 November of the preceding year in accordance with the examination procedure

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<sup>1</sup> Regulation (EU) 2017/1938 of the European Parliament and of the Council of 25 October 2017 concerning measures to safeguard the security of gas supply and repealing Regulation (EU) No 994/2010 (OJ L 280, 28.10.2017, p. 1-56) as amended by Regulation (EU) 2022/1032 of the European Parliament and of the Council of 29 June 2022 amending Regulations (EU) 2017/1938 and (EC) No 715/2009 with regard to gas storage (OJ L 173, 30.6.2022, p. 17-33).

<sup>2</sup> Regulation (EU) 2022/1032 of the European Parliament and of the Council of 29 June 2022 amending Regulations (EU) 2017/1938 and (EC) No 715/2009 with regard to gas storage (OJ L 173, 30.6.2022, p. 17-33).

referred to in Article 18a(2) of the aforementioned Regulation. The Commission is assisted by a comitology committee referred to in Article 18a(1) of the Regulation (EU) 2017/1938, the ‘Gas Storage Committee’.

- (5) Accordingly, the Commission is to adopt, by 15 November 2024, implementing acts setting the filling trajectory for each Member State with underground gas storage facilities for 2025. Given the time constraints for the adoption of those implementing acts, a single implementing act for all Member States concerned should be adopted.
- (6) In light of the high uncertainty as regards the general security of gas supply situation and the development of gas demand and supply in the Union and individual Member States, the different consumption scenarios depending on winter temperatures, and the extent of voluntary demand reduction measures implemented by Member States according to the Council Recommendation (C/2024/2476) on continuing coordinated demand reduction measures for gas<sup>3</sup>, the filling trajectories laid down in this Implementing Regulation comprise technically feasible minimum intermediate targets that allow Member States to meet the filling target of 90% by 1 November 2025.
- (7) The filling trajectories should consider, to the extent possible, those submitted by the Member States and take into consideration the Member States’ average filling rate during the preceding five years. The technical feasibility of the intermediary targets set out in this Implementing Regulation should also consider the aggregated injection capacity curve of the storage sites of each Member State. Those targets should be set in a manner that safeguards the security of gas supply at Union level, while avoiding unnecessary burdens on Member States, gas market participants, storage system operators or customers, and without unduly distorting competition between storage facilities located in the neighbouring Member States. Filling targets should also be set in a way that ensures that their implementation has no distortive impact on the proper functioning of the internal market in gas, including in gas derivatives markets.
- (8) The intermediary targets of 1 February and 1 May 2025 are important targets for the security of supply in 2025, also in view of the end of gas transit agreement through Ukraine by 1 January 2025. Setting the February target to a Union minimum average around 50% aims to reinforce security of gas supply by ensuring high availability from the storages in December 2024 and January 2025 when gas demand is high. This will be particularly important in case the 2024-2025 winter is colder than average. Nevertheless, considering the ENTSOG Winter Supply Outlook, Member States should strive to collectively reach 55% storage filling of Union underground gas storage facilities capacity to prevent a deterioration of the security of gas supply in the Union. A minimum EU-level intermediary target around 30% on 1 May 2025 is deemed sufficient to reach the November target of 90% while granting market flexibility for the storage sites. Nevertheless, in the event of higher demand and/or reduced supply during summer 2025, Member States should strive to collectively reach the filling of 45%, to reinforce security of supply by facilitating storage refilling on 1 November 2025. In line with Regulation (EU) 2017/1938, filling levels that remain up to five percentage points below the target are considered to comply with the targets of Regulation (EU) 2017/1938. Where the filling level of a Member State is more than five percentage points below the level of its filling trajectory, the competent

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<sup>3</sup> Council Recommendation (C/2024/2476) of 25 March 2024 on continuing coordinated demand reduction measures for gas.

authority should immediately take effective measures to increase it. Member States should inform the Commission and the GCG of such measures.

- (9) Filling trajectories submitted by Member States can differ from one another since they reflect country-specific situations. Also, storage targets for 1 May are generally lower than the targets of 1 February since the storage withdrawals are linked to the heating demand and storages reach their minimum at EU level around April each year.
- (10) For Member States falling under Article 6a(3) of Regulation (EU) 2017/1938, the filling target should be reduced by the volume which was supplied to third countries during the reference period 2016 to 2021 if the average volume supplied was more than 15 TWh per year during the gas storage withdrawal period (October – April).
- (11) Member States should meet the filling target of 90% of their storage facilities referred to in paragraph 1 of Article 6a of Regulation (EU) 2017/1938. In filling storage, and in light of the challenges for the filling season in 2025, Member States should make best use of all available coordination tools at EU level. The use of the demand aggregation and joint purchasing mechanism for natural gas could contribute to a better coordination of storage filling.
- (12) The filling trajectories also take into account the assessment of the GCG, which was consulted during its meeting of 3 October 2024.
- (13) This Regulation is reflecting the storage trajectories of Member States with underground storage facilities, while Article 6c of Regulation (EU) 2017/1938 provides other obligations for Member States without underground gas storage facilities.
- (14) Considering the need to set the filling trajectories for 2025 by 15 November 2024, this Regulation should enter into force on the following day of the day of its publication in the Official Journal of the European Union.
- (15) The measures provided in this Regulation are in accordance with the opinion of the Gas Storage Committee.

HAS ADOPTED THIS REGULATION:

#### *Article 1*

#### **Filling trajectories for 2025**

The filling trajectories with intermediary targets for 2025 for Member States with underground storage facilities on their territory and directly interconnected to their market area are set out in the Annex.

#### *Article 2*

#### **Entry into force and application**

This Regulation shall enter into force on the day following that of its publication in the *Official Journal of the European Union*. This Regulation shall be binding in its entirety and directly applicable in all Member States.

Done at Brussels,

*For the Commission  
The President*