



# EU DSO Entity

# Annual Report 2025

# DSO Entity at a glance

## Who are we

DSO Entity is the legally mandated EU body for European Distribution System Operators (DSOs), uniting almost 900 DSOs of all sizes in Europe, and connecting more than 250 million electricity customers across all 27 EU member States. It was formally established in June 2021 and mandated by the EU's Electricity Market Regulation to promote the completion and functioning of the internal market and help drive Europe's energy transition.

DSOs are the backbone of the changing energy system:

- DSOs integrate the largest share of renewable and intermittent power sources.
- DSOs manage volatile energy supply and demand challenges in flexible and decentralised grids.
- DSOs manage the digitalised grid and cooperate with Transmission System Operators (TSOs).
- DSOs enable customers to participate in an increasingly decentralised energy world.

DSO Entity offers its members formal representation to the European Commission by providing technical expertise on electricity distribution grids, which operate primarily on the low- and medium-voltage part of the electricity network connecting households, industries, and other end-users.

## Our mission

By taking an integrated view of the energy system, which includes customers, DSO Entity aims to strongly contribute to the energy transition, together with the entire energy ecosystem.

DSO Entity therefore acts as a strong and credible platform that

- Develops future proof network codes that reflect the new role of DSOs in the energy transition
- Provides neutral technical guidance on the integration of renewable energy sources, fostering efficient market performance
- Strengthens cooperation between DSOs and creates

an interactive forum of expertise for its members; and

- Facilitates DSO-TSO cooperation, as well as dialogue with other stakeholders.

## Our core tasks

DSO Entity's missions and pledges inspired its three pillars of activities:

- Participating in drafting the Network Codes and Guidelines which are relevant for DSOs;
- Promoting the optimal and coordinated planning and operation of DSO and TSO networks; and
- Organising expert groups and forums of expertise to exchange views on relevant topics relating to the energy transition.

By participating as a member, DSOs can actively contribute to create futureproof conditions for DSOs to actively facilitate energy transition.

## Our values

DSO Entity is committed to ensuring a diverse and balanced representation of all electricity DSOs within the European Union. It provides a platform where DSOs can contribute to developing network codes, providing neutral expertise and sharing knowledge and best practices. DSO Entity strives for transparency in all its workflows and embraces an open-minded, fact-based and consumer-centric approach. Specific attention is paid to the feasibility and proportionality of network codes and country-specific differences. Applicability for all small and large members is considered central.

## Our vision

In line with the European climate and energy objectives, DSO Entity is committed to supporting the path towards carbon neutrality in Europe by 2050 and has developed its vision as follows:

DSO Entity will support DSOs to actively facilitate the transition to a CO<sub>2</sub>-neutral energy system in the next decades, ensuring security of supply with future-proof network codes and with enhanced collaboration between TSOs and DSOs.

# Table of Contents

- DSO Entity at a glance .....2
- 1. Introduction .....4
- 2. Report of Expert Groups and Tasks Forces for 2025 .....6
  - 2.1. EG Cybersecurity.....8
  - 2.2. EG Distributed Flexibility ..... 10
  - 2.3. EG Data Interoperability ..... 14
  - 2.4. EG Existing Network Codes..... 16
  - 2.5 TF DESAP ..... 19
  - 2.6. TF NP ..... 21
  - 2.7. TF FIN..... 23
  - 2.8 Report Task Force Legal ..... 24
- 3. Report on horizontal tasks for 2025 ..... 25
  - 3.1. Knowledge Sharing and Communication Strategy ..... 25
  - 3.2. The Grid Action Plan..... 31
  - 3.3. The integration of gas DSOs into DSO Entity..... 35
- 4. Summary..... 36
- List of abbreviations..... 38

# 1. Introduction

Activities set and announced by the European Institutions in 2025 made it clear that grids will remain high on the agenda of all three European institutions for the remainder of this legislative term (2024-29). This became not only apparent in strategic publications and announcements of the European Commission but also via activities initiated by the European Parliament and the Council Presidencies.

## **Grids as core enabler of a competitive, resilient and sustainable EU**

Relevant strategic publications of the European Commission in 2025, such as the Clean Industrial Deal (COM/2025/85) or the Action Plan for Affordable Energy (COM/2025/79), highlighted the core role of grids in connecting renewables, enabling flexibility, facilitating electrification and, thereby, guaranteeing affordable electricity prices in the long run. The need for sufficient investments in grids was highlighted in the Affordable Energy Action Plan which stated that “only by accelerating investments in clean energy and infrastructure [...] can we make energy affordable” (COM/2025/79). To ensure grids are fit for purpose, a grids package was proposed on 10 December to investigate the suitability of the current European legal framework for grids and to propose adaptations – mainly in the areas of planning, permitting and connecting. Half a year earlier, the European Parliament had given its view on grids via its own-initiative report “Electricity grids: the backbone of the EU Energy System” adopted on 19 June 2025. The 17-page report highlighted the role of grids and especially DSOs in delivering EU energy and climate objectives and offered targeted recommendations on investments, economic regulation, funding and financing, permitting, grid capacity, resilience, public procurement, and skills. And, the Council Presidencies kept the focus on grids with another high-level conference organised on 28 March by the Polish Presidency on “Resilient EU grids: ensuring energy security and competitiveness”.

A consensus among the three institutions was visible regarding the central role of grids for a well-functioning European economy and the need to further improve the regulatory framework to make grids fit for purpose.

## **DSO Entity’s role in 2025**

2025 showed growing concerns not only for the EU’s competitiveness but also for the resilience of the EU energy system, and the threats posed to its electricity infrastructure, both physical and digital. Given the increasing decentralisation of the energy system, DSOs became more relevant not only for integrating renewables but also for a reliable and stable system. In 2025, the technical work needed to ensure a reliable, competitive and secure energy system in the future continued with active cooperation and interactions between DSO Entity, ENTSO-E, European institutions and stakeholders. DSO Entity, alongside its 830 members, continued to work to promote the functioning of the European electricity market, and facilitate the energy transition. The core of the Secretariat’s work remained fulfilling its mandated tasks in the development of technical rules and guidelines and a close cooperation with ENTSO-E. On top of the regular work, 2025 was characterized by three major projects: the delivery of the remaining actions in the

Grid Action Plan, the dissemination of DSO Entity's [Technical Vision](#) and follow-up activities, and the preparation for the integration of gas and hydrogen DSOs into DSO Entity.

### **Objective and structure of the 2025 Annual Report**

DSO Entity is legally obliged to present each year an Annual Report, informing about the delivered mandated tasks and key accomplishments with a special focus on the work of its EGs and TFs. (Electricity Market Regulation, 2019/943/EU2, Art. 55 (2d)).

**Chapter 1** provides context as to the general environment in which DSO Entity evolved in 2025

**Chapter 2** gives a detailed overview of the delivery of the mandated tasks of all the EGs and TFs

**Chapter 3** describes DSO Entity's completed deliverables on horizontal tasks such as the Knowledge Sharing Strategy

**Chapter 4** concludes the 2025 Annual Report

## 2. Report of Expert Groups and Tasks Forces for 2025

This chapter provides an overview of the activities, deliverables, and key achievements of DSO Entity's Expert Groups (EGs) and Task Forces (TFs) during the reporting period. The EGs and TFs constitute the technical backbone of DSO Entity and are the primary vehicles through which the organisation fulfils its legally mandated tasks, supports European institutions, and contributes to the development and implementation of technical rules, methodologies, network codes, and guidance relevant to distribution system operators.

Their work is framed by the EU DSO Entity Technical Vision, which provides an overarching, holistic perspective on the future European energy system from a DSO viewpoint. The Technical Vision articulates how a fully decarbonised, digitalised and customer-centric energy system should function, identifies key system characteristics that need to evolve, and sets strategic directions that guide and align the activities of all EGs and TFs. Against this backdrop, the individual workstreams described in this chapter represent concrete and coordinated contributions to the long-term transformation pathway outlined in the Technical Vision.

In 2025, the work of the EGs and TFs was characterised by an increased level of cooperation with ENTSO-E, notably through fourteen established joint working groups and their associated stakeholder platforms, the contribution to the ENTSO-E Expert Panel on the Iberian incident as well as intensified exchanges between the respective Boards of Directors in the context of the Joint Work Programme. This strengthened collaboration reflects the growing need for coordinated TSO-DSO approaches to address system-wide challenges such as cybersecurity, flexibility integration, data interoperability, digitalisation, network planning, and grid hosting capacity.

Beyond bilateral cooperation with ENTSO-E, the EGs and TFs also continued to engage closely with ACER, the European Commission, national regulatory authorities, and a wide range of stakeholders. Their work supports both the development of new European regulatory frameworks, such as network codes, implementing acts, and methodologies, and the consistent implementation of adopted legislation across Member States.

The sections below present the main work areas, milestones, and deliverables of each EG and TF. Together, they illustrate how DSO Entity's technical bodies, guided by the Technical Vision, contributed to a reliable, secure, and efficient European electricity system and to the achievement of the EU's energy transition objectives



Figure 1: EGs & TFs activities in 2025

## 2.1. EG Cybersecurity

### Work Area 1: Finalisation and approval of the Cybersecurity Risk Assessment

#### Description

According to Article 18(1), the NCCS Expert Group on cybersecurity, a DSO Entity/ENTSO-E joint working group, developed the Cybersecurity Risk Assessment Methodologies. These methodologies specify how to perform cybersecurity risk assessments:

- at Union level in the Union-wide cybersecurity risk assessment.
- at regional level in the regional cybersecurity risk assessment.
- at Member State level in the Member State cybersecurity risk assessment.

Several workshops were organised with stakeholders, and the draft methodologies were opened for public consultation. In addition, DSO Entity performed a dedicated knowledge sharing for DSO High impact and Critical impact entities through newsletters to help them understand the implementation aspects of these methodologies. These methodologies were approved by the Board of each association in March 2025 and then submitted to the TSOs.

#### Deliverable

Cybersecurity Risk Assessment Methodologies

### Work Area 2: Completion of the Cyber-attack classification scale methodology

#### Description

The NCCS Expert Group on cybersecurity developed the Cyber-attack classification scale methodology in accordance with Article 37(8) of the NCCS. This Methodology provides the rules for classifying the gravity of cyber-attacks according to five levels, the two highest levels being 'high' and 'critical'. It sets out criteria for affected high-impact or critical-impact entities identified according to Article 24 of the NCCS Regulation, to assess whether a cyber-attack at entity level is considered reportable according to Article 38(4) of the NCCS Regulation. This methodology was finalised based on input from stakeholders gathered through public webinars and an open public consultation. The deliverable was approved by both DSO Entity and ENTSO-E in June 2025 and submitted to TSOs by ENTSO-E.

#### Deliverables

Cyber-attack classification scale methodology

### Work Area 3: Development of the Provisional list of standards and controls

#### Description

DSO Entity/ENTSO-E joint working group has developed the provisional list of standards and controls (pursuant to Article 48(6) of the NCCS), required by national legislation with relevance for cybersecurity aspects of cross-border electricity, by identifying the most relevant and widely applied standards and control in the electricity sector. The controls required by national legislation have been provided by the Competent Authority, in accordance with Article 48(7) of the NCCS Regulation. The provisional list of standards includes European and international standards and national legislation which provide guidance on:

- methodologies for cybersecurity risk management at entity level; and
- cybersecurity controls equivalent to the controls that are expected to be part of the minimum and advanced cybersecurity controls.

This deliverable was finalised and approved by the Board of each association in June 2025. The approved document was published on DSO Entity and ENTSO-E websites.

#### Deliverables

Provisional list of standards and controls

### Work Area 4: Perform feasibility study to develop a common tool

#### Description

In 2025, the joint working group began drafting a feasibility study to assess the practicality and financial costs of developing a common tool that would enable all entities to share information with the relevant national authorities in accordance with Article 37(9) of the NCCS. The first draft was prepared by an information sharing subgroup and is under review process. The engagement with ENISA agency started in early drafting phases and is ongoing. This deliverable is expected to be finalised on 13 June 2026.

### Work Area 5: Business Continuity Management

#### Description

In 2025, the dedicated experts part of the Business Continuity Management (BCM) subgroup contributed to strengthening business continuity and operational resilience across European DSOs in response to increasing cyber, physical, regulatory, and climate-related risks.

#### Deliverables

The development of a common Business Impact Analysis template (BIA) and of a Risk Impact Matrix (RIM) based on DSOs use cases and on expert input. These deliverables were approved by DSO Entity Board and will be submitted to DSOs.

### Work Area 6: Knowledge sharing

#### Description

The Expert Group Cybersecurity organised a wide range of knowledge-sharing activities and related documents. Comprehensive materials were prepared, including documents, slides, and videos to communicate the NCCS implementation phase and its supporting documents. These deliverables aimed to clarify the roles and responsibilities of DSOs under NCCS. The Engagement with DSOs and external stakeholders was done through meetings, webinars, newsletters, social media, etc.

#### Deliverables

- Supporting documents for NCCS implementation: step-by-step guidance on how to carry out specific activities, such as Risk Assessment, helping members to implement the requirements outlined in various articles of the NCCS.
- Targeted newsletters for High Impact and Critical Impact entities.

## 2.2. EG Distributed Flexibility

### Work Area 1: Development and implementation of the Network Code Demand Response (NC DR)

#### Description

The **Network Code on Demand Response** (NC DR) is developed under Regulation (EU) 2019/943 to facilitate the participation of demand response in electricity markets and to ensure secure and efficient system operation across the EU. In line with Article 59(1)(e) of the Electricity Market Regulation, DSO Entity and ENTSO-E, have been mandated to submit a proposal for the NC DR to ACER.

The work area encompasses the **development, consultation, and adoption phases of the NC DR**. Once adopted, the NC DR will set out the rules and methodologies for demand response, and the EG DF Experts will implement the mandates and tasks assigned to DSO Entity, ensuring that DSOs are able to facilitate the integration of demand response solutions, support flexibility, and contribute to secure and efficient electricity system operation across Member States.

#### ***1.1 Monitor the completion of the legal process for the development and implementation of the NC DR***

DSO Entity continued its active engagement in the legal process of the NC DR throughout 2025, in close dialogue with ACER, the EC, and ENTSO-E. Following the joint NC DR proposal submitted by DSO Entity and ENTSO-E on 8 May 2024, and ACER's public consultation and stakeholder engagement during Q3–Q4 2024, ACER submitted its recommendation for the establishment of the NC DR to the EC on 7 March 2025.

Subsequently, the EG DF convened the previously established Development Team to analyse and review ACER's revised NC DR proposal. Based on this analysis, the EG DF developed DSO Entity's response and submitted it to the EC as part of the "targeted consultation to support the establishment of a new network code on demand response" on 12 September 2025.

The process has since continued at EC level and is being followed within the framework of the comitology procedure. Considering the timeline extension into 2026, the deliverables defined for the implementation of the NC DR have been shifted accordingly and will continue throughout 2026.

#### ***1.2 Supporting the Demand Response European Stakeholder Committee***

Based on Article 7 of ACER's recommendation on the NC DR of 7 March 2025, EG DF is tasked with organising **stakeholder involvement** related to demand response, secure system operation, and other aspects of the implementation of the Regulation. This includes regular engagement with stakeholders to identify implementation challenges and propose improvements, notably in relation to Union-wide terms and conditions or methodologies, as well as data exchange standardisation.

In 2025, ACER, DSO Entity and ENTSO-E established the **Demand Response European Stakeholder Group (DRESG)** under the existing European Market Stakeholder Committee (MESOC). The DRESG serves as an EU-level platform to support the monitoring of the implementation of the NC DR and to facilitate the exchange of general views among stakeholders on demand response-related topics.

The first DRESG meeting took place on 3 November 2025 and brought together representatives from ACER, DSO Entity, ENTSO-E, European Commission, and 14 other stakeholder organisations.

In addition, two dedicated meetings were held in 2025 to provide system operator feedback to ACER on aggregation models and baselining, addressed as two separate workstreams. These exchanges aimed to ensure that system operator perspectives are duly reflected in ACER’s monitoring activities and in the further development of the NC DR framework.

### Deliverable

- Monitoring the completion of the legal process for the development of the NC DR in cooperation with ENTSO-E and in dialogue with ACER and the European Commission – **December 2025**.
- Preparation of an Action Plan for the NC DR to ensure timely and efficient implementation of the tasks defined for DSO Entity in the NC DR – **December 2025 and ongoing**.
- Preparation of a Communication Plan for the NC DR to inform all parties involved in the NC DR of their obligations under the NC DR and to involve these parties in the development of the terms, conditions and methodologies – **December 2025 and ongoing**.
- Cooperation with ENTSO-E in the Development of the proposals for the Union Wide methodologies on the fields defined under NC DR - **December 2025 and ongoing**.
- Supporting the European Stakeholder Committee for Demand Response in cooperation with ENTSO-E – **December 2025 and ongoing**.

## Work Area 2: Methodology proposal for a Flexibility Needs Analysis (FNA) of SOs according to the EMDR

### Description

The Flexibility Needs Analysis (FNA) work area covers the implementation of Article 19e of Regulation (EU) 2019/943 (REG), as amended by Regulation (EU) 2024/1724 under the Electricity Market Design Reform (EMDR). Under this provision, DSO Entity and ENTSO-E are mandated to define the type and format of data and to develop a **common methodology for the analysis of flexibility needs (FNAM)** to be applied by TSOs and DSOs across the EU.

The FNAM establishes a framework enabling TSOs and DSOs to assess and report their flexibility needs and to provide the resulting analyses to the relevant national regulatory authorities or designated entities.

### ***2.1 Submission of the Proposal of Flexibility Needs Assessment Methodology (FNAM) & Stakeholder Engagement Process***

Following the EMDR mandate defined under Article 19e of Regulation (EU) 2019/943, DSO Entity and ENTSO-E established a joint task force in 2024. The joint work continued throughout Q1 2025 to ensure the finalisation of the common proposal and its approval by both associations.

On 31 March 2025, DSO Entity organised an “Ask Me Anything” webinar on the FNAM enabling its members to better understand the methodological challenges, provide feedback and raise questions ahead of the formal approval process. In parallel, following the **submission process**, DSO Entity and ENTSO-E organised two public webinars in Q1 2025 to present the FNAM proposal and gather input from interested stakeholders.

The final joint proposal was completed and submitted to ACER on 17 April 2025, in line with the deadline defined in the Electricity Regulation. DSO Entity and ENTSO-E continued their close **dialogue with ACER** through regular meetings and participated in a formal hearing with ACER in May 2025, following which they submitted a joint official letter providing comments on ACER’s draft revisions.

## 2.2 Monitoring the implementation of the FNAM & Development of DSO Entity Guidance

Following its submission, the FNAM was approved and adopted by ACER on 25 July 2025, thereby launching its implementation phase at national level.

Within this work area, DSO Entity plays a key coordinating role in supporting the consistent application of the FNAM across Member States. This includes coordinating TSOs and DSOs, in close cooperation with ENTSO-E, on the data and analyses required for the preparation of national FNA reports, preparing and publishing **EU-level guidance for DSOs**, and contributing to the coordinated selection of at least one EU policy target year to be assessed by system operators in all Member States, in line with the objectives set out in Article 19e of the Electricity Regulation.

To achieve this, the EG DF established a subgroup on “Monitoring the FNAM & DSO Entity Guidance” in Q2 2025 to steer the implementation phase of the FNAM and to prepare the DSO Entity guidance by January 2027. Additionally, DSO Entity’s coordination role under the FNAM is enabled via an established network of Single Points of Contacts (SPOCs), nominated by Member States, that serves as direct liaison points for addressing questions, collecting feedback, and sharing good practices from DSOs across the EU.

### Deliverables

- Definition of the format and type of data and development of a proposal for a methodology to analyse the flexibility needs of DSOs and TSOs at national level, in cooperation with ENTSO-E, and submission to ACER. [(EU) 2019/943 Article 19(e)(4)] – **17 April 2025**.
- Ask me Anything Webinar on Flexibility Needs Analysis Methodology - **31 March 2025**.
- Cooperation with ENTSO-E to coordinate TSOs and DSOs in providing the data and analysis defined in the methodology, once approved and published by ACER. [(EU) 2019/943 Article 19(e)(5)] - **Q3-Q4 2025 and ongoing**.

## Work Area 3: Implementation of Action 6 of EU Action Plan for Grids

### Description

This work area covers the implementation of Action 6a of the EU Action Plan for Grids, which aims to improve **transparency and visibility of available grid hosting capacities** across the European electricity network. In cooperation with ENTSO-E, DSO Entity contributes to the definition of harmonised concepts for available grid hosting capacity and to the development of a pan-EU overview of grid hosting capacities.

The objective of this action is to provide clear and comparable information to new and prospective network users, facilitating more efficient grid connection processes and supporting informed investment decisions. By increasing transparency on grid hosting capacities, the initiative also provides greater visibility to project developers at the early stages of project conceptualisation, notably for renewable energy projects, electrification solutions and electric vehicle recharging infrastructure.

### 3.1 Identification of key deliverables of the Joint Task Force & Stakeholder Engagement

A DSO Entity – ENTSO-E Joint Task Force (JTF) worked on a common understanding of current capacity mappings in Europe and agreed on a joint format to present a pan-EU overview of grid hosting capacity. The JTF works in close cooperation with European Commission and the relevant stakeholders to deliver:

- Supporting definitions (Capacitypedia)
- Common Information portal to the grid hosting capacity information websites (Portal)
- Sharing of good practices

The joint deliverables were presented by DSO Entity at the Energy Infrastructure Forum in June 2025.

### **3.2 Implementation of the Action 6 of the EU Grid Action Plan**

Following the Conclusions of the Energy Infrastructure Forum 2025, the **Capacitypedia Progress Report** was published on 19 December 2025. It provides an overview of the information collected from DSOs and TSOs and sets out the progress achieved under the Grid Action Plan on Hosting Capacity. It also presents a structured outlook, while work continues towards the launch of a **pan-EU Joint Portal** in 2026.

In the meantime, a preliminary website was created to ensure transparency and to make the main progress, key documents and updates publicly available.

Considering its strategic relevance within the current Action 6 timeline, the Ask Me Anything webinar has been rescheduled to take place after the launch of the joint portal and prior to the 2026 Copenhagen Forum.

#### Deliverables

- **Capacitypedia Progress Report delivered on 19 December 2025**
- Establishment of a **pan-EU overview** of available grid hosting capacities for new network users to connect in cooperation with ENTSO-E: **December 2025 & ongoing**
- **Ask Me Anything Webinar** on harmonized definitions on the grid hosting capacities-**December 2025 & Ongoing**

### **Work Area 4: Knowledge sharing & Communication Strategy on Distributed Flexibility**

#### Description

The EG DF facilitates the exchange of knowledge with member distribution system operators on topics related to **distributed flexibility**. Webinars were initiated in 2024, with a total of 10 countries sharing their **existing practices**. Of these, a series of webinars with experts from 5 countries was completed in 2025.

Based on the findings from these webinars, the EG DF completed a **report** highlighting key recommendations to support DSOs in developing markets for local services. The drafting and approval phases of the report within the EG DF process were completed in 2025, while the DSO Entity internal approval for the dissemination of the report and publication processes, are expected in Q1 2026.

The Reflection Paper on Best Practices on Flexible Connection Agreements (FCAs) facilitates knowledge exchange among DSOs on the **implementation of FCAs and related practical experiences**. It was agreed to continue the work on FCAs in 2026, with a more comprehensive review of the latest regulatory developments and their interaction with DSO Entity' strategic priorities.

### **4.2 Representation of DSO Entity in External Events**

In 2025, the EG DF Experts represented DSO Entity at several European events, such as **ENLIT Europe**, the **Florence Forum**, the **Energy Infrastructure Forum**, and **ACER webinars on the Network Code on Demand Response**.

#### Deliverables

- Report on Best Practices on Distributed Flexibility: **for approval & publication in Q1 2026**
- Ask me Anything Webinar on Report on Best Practices: **postponed to Q1 2026**
- Reflection Paper on Best Practices on Flexible Connection Agreements (FCAs): **Postponed to 2026**

## 2.3. EG Data Interoperability

### Work Area 1: Contribution to Joint Working Group (JWG)

#### Description

The EGDI group and part of its members are directly involved in the work of the Joint Working Group (JWG) together with ENTSO-E. The scope of its work is enshrined in Articles 11 and 12 of the Implementing Act on Electricity Metering and Consumption Data (EU) 2023/1162. Additionally, it tracks and assesses the JWG's progress and, when needed, offers recommendations to the DSO Entity Board of Directors (BoD) about its output.

#### Deliverables

2025 was a key year for the submission of important deliverables within the JWG. More specifically:

**March 2025:** After taking the roles previously undertaken by ebIX, DSO Entity (together with ENTSO-E) published a new version of the [Harmonised Electricity Market Role Model \(HEMRM\)](#)

**July 2025:** Launch of the [common JWG repository](#) where, among other information, the JWG publishes the reference models being submitted by Member States in compliance with Implementing Regulation (EU) 2023/1162.

**December 2025:** Submission of the draft of the Implementing Act for interoperability requirements in Demand Response to the European Commission.

The JWG also started preparatory work in two documents related to the Implementing Regulation in Customer Switching. The first of these documents is the Implementation Guideline aimed at supporting Member States in the submission of the mapping of their reference model for this Implementing Regulation. The second document is the technical guide for the system operators to facilitate that they implement this reference model. The finalisation of these two documents will be undertaken when the new Implementing Regulation is published by the European Commission.

### Work Area 2: Support work in the sub-groups of the Smart Energy Expert Group (SEEG)

#### Description

The Smart Energy Expert Group (SEEG) started its work in October 2024 as part of the EU Action Plan on the Digitalisation of the Energy System. DSO Entity is a member of the SEEG by construction (i.e., without application).

EG DI leads the work from DSO Entity in one of the sub-groups – sub-group Data4Energy –, with the aim to advance interoperability and secure data exchanges across distribution systems in the EU; and ensure a DSO perspective in the EU's digital transformation of the energy systems.

### Deliverables

EG DI members took a very active role in the development of the initial work of this group which includes the identification of the necessary steps to create a Common European Energy Data Space.

Given the growing activities in the group, EG DI decided to expand the number of experts involved in these activities. As a result, new resources and experts have already been allocated within the different subgroups within Data4Energy.

### Work Area 3: Submeters (including Dedicated Measurement Devices (DMDs))

#### Description

As part of its knowledge-sharing activities, EGDI developed in September 2024 an internal reflection paper on sub-metering, exploring its potential to enhance energy management, demand response, and flexibility services. For this year, the team monitored potential new development in this area to consider whether there was a need to update this paper.

#### Deliverables

As part of this knowledge-sharing activity, the EGDI group answered in October 2025 to a new call for evidence launched by the European Commission regarding the necessity (or not) of a new update for the Measuring Instruments Directive (MID). The main aim of the MID is the harmonisation of the design and manufacturing requirements for a wide range of measuring instruments, including smart meters and DMDs, so that they provide correct and reliable information.

### Work area 4: Analysis of data interoperability for energy sharing

#### Description

EGDI identified the necessity to ensure some degree of data interoperability between different Member States for energy sharing activities. Therefore, this workstream extend the work EG DI undertook in 2024 for the development of a reference model that could be used for energy sharing activities.

#### Deliverables

Throughout the reporting period, EGDI continued laying the foundations for future work in this area. Initial preparatory activities were carried out through a series of informal meetings, during which the group began shaping a preliminary roadmap to support a comprehensive perspective on the forthcoming implementing regulation on energy sharing.

## 2.4. EG Existing Network Codes

### Work Area 1: Follow-up on the amendments to grid connection Network codes (NC RfG and NC DC)

#### Description

In 2023 ACER and DG Ener opened the revision process for the NC RfG, NC DC and NC HVDC. Upon ACER's presentation of the first draft of the amended network codes, the EG participated in the dedicated public consultation providing extensive feedback on the text proposals, including comments of technical and editorial nature. After the public consultation, which took place in September 2023, the European Commission took responsibility for advancing the revision process, which includes the following steps: the presentation of a new legal text, the opening of a new public consultation, the publishing of the revised network codes. In 2024, ACER drafted amendments to the Network Code on HVDC. In 2026, the European Commission is planning to launch a public consultation on RfG and DC Network Codes.

#### Deliverables

The EG took part in the revision of the Network Codes RfG and NC DC by formally and informally providing feedback and input to the EC and ACER. On a more informal level, the EG kept interacting with relevant stakeholders (ENTSO-e, ACER and the EC), found shared positions on a series of topics, for instance compounding. This required the EG to participate in several meetings, while developing technical content.

### Work Area 2: Guidance Document of GFC in DSO networks

#### Description

Grid forming capabilities will allow for the massive integration of renewable energy into the grid, while keeping overall system stability, but at the same time pose a challenge for DSOs. This is why in 2024 the workstream started developing a guidance document for DSOs on the measures required for the implementation of grid forming capabilities. It seems likely that the guidance document will be extremely relevant for DSO's by helping to develop a "roadmap" which will be legally required in the NC RfG 2.0.

#### Deliverables

In 2024 the basis for the work on this topic was laid. In 2025, the EG completed the guidance document, which also included risk mitigation measures for DSOs, and provided the basis on which DSOs may need to seek regulatory funding for those mitigations.

### Work Area 3: Development of Certification schemes for EVs and Heat Pumps

#### Description

In 2024, our EG put forward the proposal of creating an expert group on certification schemes for EVs and Heat pumps in the framework of the ESC GC. This proposal was welcomed with enthusiasm by ACER and stakeholders, and our EG worked on delivering the skeleton of the ToR for this expert group. Although the EG Existing Network Codes doesn't have full ownership over the work of this expert group, which is in fact under the European Stakeholder Committee GC, it will nonetheless provide valuable inputs through its experts. This expert group has kicked off its activities in November 2024, while the most part of the work was carried out in 2025.

### Deliverables

The EG EX NC provided Secretarial support for the organization of this expert group. Through some of its experts, technical contributions were provided. The technical annexes were created and the entire EG EX NC was informed and involved during the process

## Work Area 4: Continuous Interaction within the European Stakeholder Committees on GC and SO

### Description

Since 2023 DSO Entity is formally one of the co-organizers of the European Stakeholders Committees Grid Connection and System Operations. The EG EX NC both provides technical input through its experts and Secretarial support through the EG coordinators.

### Deliverables

EG Existing network codes experts provided technical input during these meetings. This endeavor required experts to prepare documentation before the meetings. While the general meetings of the ESC are held 4 times a year, there were several other meetings of ad-hoc and temporary sub-groups within the ESCs that took place more frequently (workstream on heat pumps, EVs, SPGMs and Power2Gas, Iberian incidents). The EG coordinators carried out secretarial support by organizing the general ESC meeting once a year, following a well-defined division of work between EU DSO Entity, ACER and ENTSO-E. Expert group coordinators nonetheless worked on drafting the minutes for the general ESC meetings, upon agreement with colleagues from ACER and ENTSO-E.

## Work Area 5: Review of existing NC or GL, especially as of new NC on Demand Side Response

### Description

The newly drafted NC Demand Side Response was shown to interact with some existing network codes. For instance, the current version of the NC demand response affects: 1) SO GL, 2) EB Regulation, 3) SO Regulation amendments DR NC including CACM 2.0 4) NC DC

### Deliverables

EG Existing Network codes experts supported this work by providing technical opinions on topics affecting existing network codes. This involved preparation of written technical analysis, response to public consultation, interactions in meetings.

## Work Area 6: Possible re-opening of existing NC or GL, or documents such as GLDPM, KORRR, System Operation Guideline and Balancing Guidelines

### Description

The primary goal of the EG is to participate in the revision process of the existing network codes (an overview [here](#)). Although it is unknown whether/when ACER will decide to start revising other existing network codes, the EG EX NC must find itself ready.

### Deliverables

EG Existing Network codes experts started a set of meetings on SO GL topic in October 2025. The meetings involved preparation of technical analysis and interaction with ENTSO-E.

## Work Area 7: Collaboration with relevant Stakeholders

### Description

Collaborating with stakeholders on technical matters is one of the key pillars of this EG and EU DSO Entity in general. In particular, this EG collaborates closely with ENTSO-E, ACER and other key industry players in the framework of the European Stakeholder Committees. Ad-hoc interactions with specific stakeholders are organised to discuss certain topics.

### Deliverables

EG coordinators will facilitated the organisation and follow-up of these interactions, by arranging the meetings and producing minutes. Experts contributed to these interactions by providing their technical expertise.

## 2.5 TF DESAP

### Work Area 1: Define Smart Grid Indicators for the European Grid Operators

#### Description

The primary objective of the Task Force Digitalisation of the Energy System (TF DESAP) in 2025 was to provide guidance and support for network operators on sustainable and cost-effective smart grid investments. This was to be achieved through collaboration with ENTSO-E, ACER and the NRAs (CEER) to develop a carefully selected set of Smart Grid Indicators via a stepwise and collaborative learning process. A key milestone was to deliver a comprehensive initial update at the Energy Infrastructure Forum in June 2025. Building on the groundwork laid in 2024, TF DESAP provided input for a report developed by CEER.

#### Deliverables

- TF DESAP contributed to a report developed by CEER on key principles on smart grid indicators.
- Following the 2025 Energy Infrastructure Forum, TF DESAP continued developing with CEER, ACER, and ENTSO-E an indicative list of input and output Indicators. This work will continue in 2026.

### Work Area 2: Define a concept for a Digital Twin of the European electricity grid

#### Description

In 2025, TF DESAP continued its collaboration with ENTSO-E to define key concepts, set priorities for Digital Twin use cases, and develop a roadmap and recommendations for an EU electricity grid Digital Twin. Building on earlier work, the Task Force moved beyond the identification of challenges and adopted a more practical, interactive approach focused on concrete use cases and actionable recommendations. The Joint Task Force concluded the year by launching the final phase of the joint work: the development of a Digital Twin Roadmap, scheduled for delivery in Q1–Q2 2026.

#### Deliverables

- Within the Joint Task Force with ENTSO-E, TF DESAP delivered two reports:
  - TSO-DSO Challenges and Opportunities for the Digital Electricity System
  - TSO-DSO Use Cases and Digital Twin Solutions
- As part of the dissemination practices of the Joint Task Force, TF DESAP participated and co-presented key messages within the webinar organized to showcase the report “TSO-DSO Challenges and Opportunities for the Digital Electricity System”.

### Work Area 3: Support system operators in digitalizing and streamlining procedures for grid connection requests

#### Description

TF DESAP developed a report outlined in the GAP, notably action point 6, specifically focusing on supporting system operators to digitalize and streamline procedures for grid connection requests. The

Task Force focused on digitalisation efforts that enhance efficiency, transparency, and customer satisfaction within the early phases of inquiry, assessment and approval of connection requests. TF DESAP aimed to deliver a focused output addressing the challenge of digitalising and streamlining connection requests by identifying existing solutions and disseminating best practices across EU Member States.

#### Deliverables

- TF DESAP developed a report on good practices identified from DSOs/Member States that addresses challenges in digitalising and streamlining connection requests.
- Dissemination of the Digital Solution for Grid Connection Request report, which was also presented at GEODE - WG Innovation & Development on 5 November.

### Work Area 4: Define a concept to promote the uptake of smart grid, network efficiency, and innovative technologies for system operators

#### Description

After the successful launch of the Technopedia Concept in 2024, TF DESAP continued its cooperation with ENTSO-E and various external stakeholders. In 2025, the Task Force progressed by developing the content for the DSO/TSO Technopedia platform further by jointly collecting and reviewing with ENTSO-E relevant and valuable material from organisations and companies who wished to contribute to the DSO/TSO Technopedia. The first iteration of the DSO/TSO Technopedia platform was successfully launched.

#### Deliverable

- Jointly with ENTSO-E, TF DESAP developed and launched the first iteration of the DSO/TSO Technopedia platform.
- Jointly with ENTSO-E, TF DESAP co-hosted webinars that presented key information to external stakeholders on the DSO/TSO Technopedia development.

### Work Area 5: Knowledge Sharing

#### Description

The Task Force actively participated in external events and conferences. A key objective for 2025 was to present a unified and well-coordinated position on Smart Grid Indicators at the Copenhagen Forum 2025. In addition, in response to the GAP (specifically Action 7) issued by the European Commission in November 2023, TF DESAP aimed to develop a knowledge-exchange platform similar to ENTSO-E's Technopedia. This platform would serve as a central hub for information sharing and collaboration, while proactively engaging external stakeholders in the development and drafting of its content.

#### Deliverable

- TF DESAP jointly presented with ENTSO-E the work on Smart Grid Indicators at the 2025 Copenhagen Infrastructure Forum

## 2.6. TF NP

### Work Area 1: Distribution System Development

#### Description

Enhance the transparency, reliability, and forward-looking nature of Distribution Network Development Plans (DNDPs) to support a sustainable and resilient distribution system. As DSOs face increasing demands to integrate renewable energy sources, manage flexible demand, and reduce connection delays, robust DNDPs are essential. This work conducted in TF NP sought to strengthen the capacity of DSOs to develop and implement high-quality DNDPs that align with EU energy and climate objectives. The focus throughout 2025 focused on mapping existing DNDPs, identifying good practices, and establishing guidelines to support DSOs of all sizes, especially smaller operators facing resource constraints.

#### Deliverable

- TF NP presented its key DNDP messages at the Energy Infrastructure Forum in Copenhagen.
- TF NP published eight key messages in response to ACERs developed guidance document on Distribution Network Development Plans.
- TF NP participated in the first of a series of workshops on the topic of DNDPs with all relevant stakeholders, derived from the 2025 Energy Infrastructure Forum conclusions.

### Work Area 2: Collaborate on joint Distribution and Transmission System Development

#### Description

Task Force NP aimed at promoting integrated and coordinated planning between DSOs and TSOs to enable a unified approach to energy transition and infrastructure development. Given the interconnected nature of Europe's energy networks, it is essential for DSOs and TSOs to align their planning processes. This work focused on fostering collaboration between distribution and transmission network operators, enabling coordinated grid development that integrate renewable energy, meets flexibility needs, and responds to cross-sectoral demands from areas like electromobility and heating. By improving data exchange and standardizing planning methodologies, TF NP supported the creation of a streamlined approach to joint network planning, helping DSOs and TSOs manage shared challenges, optimize resources, and support an interconnected and resilient European energy system.

#### Deliverable

- The Task Force exchanged with ENTSO-E on network planning, TYNDP, ERAA, and DNDPs.
- TF NP began coordinating with ENTSO-E on network development plans within the context of the Energy Infrastructure Forum conclusions which called for the development of a report on best practices on TSO-DSO collaboration.

### Work Area 3: Guidance on Flexibility and Market Integration

#### Description

The TF worked collaboratively to equip DSOs to quantify flexibility needs as part of the distribution system development, promoting the integration of flexibility resources like demand response and energy storage to enhance grid stability and support decarbonization.

#### Deliverable

TF NP supported Expert Group Distributed Flexibility with the development of a methodology to assess flexibility needs together with ENTSO-E as requested by (EU) 2024/1747 in article 19e

### Work Area 4: Knowledge sharing

#### Description

TF NP aimed to foster knowledge exchange among DSOs to improve network planning capabilities, share successful approaches, and support the adaptation of best practices across diverse DSO profiles.

#### Deliverables

- TF NP held internal knowledge exchange sessions surrounding various topics related to DNDP development and practices.
- TF NP exchanged internally, with ENTSO-E, as well as with relevant stakeholders on the practices of network planning and the intricacies that arise within DSO development of DNDPs. These included exchanges surrounding connection requests, supply chains, as well, within relevant sectors such as data centers and EV infrastructure deployment.

## 2.7. TF FIN

### Work Area 1: Regulation and Tariffs

#### Description

With the objective of supporting the delivery of GAP Actions 4 and 8, this workstream examined how regulatory tools and tariffs could enable DSOs to access the funding required to deliver the energy transition, while considering interactions with other regulatory objectives. To support this work, TF FIN assessed potential barriers and identified good regulatory practices aimed at removing them.

#### Deliverables

- February 2025: publication of a paper presenting the interaction between Anticipatory Investments and the regulatory framework
- July 2025: publication of a paper identifying potential regulatory mechanisms National Regulatory Authorities use to facilitate innovation among DSOs
- December 2025: publication of a paper considering the different approaches to network charges and the potential effects they would have on the incentives of the different network users. This paper was developed with the Expert Group in Demand Flexibility.
- Participation in the European Commission's workshops on the Guidance document for the implementation of regulatory frameworks that account for anticipatory investments.

### Work Area 2: Finance and Funding

#### Description

The aim of this work area was to support the delivery of GAP Actions 9 and 10a by facilitating the identification of potential limitations in the different sources available to fund the investment of DSOs (i.e. financial markets and public funds). In doing so, the task force considered the main characteristics of these financing sources and how they would interact with the main characteristics of the DSOs.

#### Deliverables

- June 2025: publication of a paper identifying the main challenges DSOs have found in previous years when aiming to access public funds. This paper was based on an internal survey among members with the objective of identifying challenges across the different Member States.
- June 2025: publication of a paper identifying the main challenges DSOs can face when accessing funds in financial markets and how these challenges would interact with the main characteristics of the DSOs (e.g. size of the company or ownership structure)

These documents formed the basis for extensive engagement with the European Commission (e.g. responses to consultations on the Multiannual Financial Framework), the European Investment Bank, the investors' dialogue, and other relevant stakeholders. To support this work, the task force also organised a blended finance workshop with representatives from the European Investment Bank, the European Bank for Research and Development, the investors' dialogue, and private investors. This work

further underpinned the development of a paper examining how the proposed new Multiannual Financial Framework could interact with the significant investment needs of DSOs.

## 2.8 Report Task Force Legal

Task Force Legal provides legal expertise and advice to all Expert Groups and Task Forces, helping them effectively address the requirements outlined in the Electricity Regulation (EU) 2019/943. The engagement of legal experts at the Member State level ensures that national contexts are considered and positions DSOs effectively within the evolving landscape of network codes and guidelines. In 2025, TF Legal strategically analysed proposed regulations, provided legal analysis, and actively engaged with DSO Entity's counterparts to represent its members on the following topics:

- EG Cybersecurity: NCCS Legal Group
- EG Distributed Flexibility: FNA Methodology and NC DR
- EG Data Interoperability: JWG on Data: IR on Demand Response
- TF Network Planning: Public Procurement Directives' revision and Grid Action Plan AP13
- EG Existing Network Codes: Revision of the Grid Connection NC
- TF FIN: Tariff methodologies

## 3. Report on horizontal tasks for 2025

### 3.1. Knowledge Sharing and Communication Strategy

In 2025, DSO Entity implemented its third annual Knowledge Sharing Strategy (KSS) and intensified the sharing of technical expertise, knowledge and good practices. Keeping a three-track approach and a strong connection to its Communication Strategy, DSO Entity delivered on the Knowledge Sharing Strategy for 2025 (KSS25) by striving to increase the involvement of its members and build cooperation with external stakeholders.

The KSS25 built upon DSO Entity's Technical Vision; and furthermore, continued to be key when delivering the tasks assigned to DSO Entity in the EU Grid Action Plan (COM/2023/757) in view of the Copenhagen Forum of 2025 (and the 2026 edition). The KSS25 also adapted to the shift of the EU priorities with a stronger focus on competitiveness and resilience.



Figure 2: DSO Entity's three-track Knowledge Sharing Strategy 2025

#### **KSS25: Sharing expertise on the relevance of DSOs for a clean, competitive and secure Europe**

In 2025, the **KSS25 followed an approach pursuing the delivery of three main tracks**, building upon DSO Entity's Technical Vision. Special attention was given to the second track of the KSS25 in the context of the Clean Industrial Deal and its implementation. DSO Entity thus intensified the work carried out to **raise awareness on the relevance of distribution grids not only for achieving the clean energy transition but also for ensuring affordable energy prices and enhancing the security of the EU energy system**. Key reports were developed and external events organised to share expertise, key figures and good practices on DSOs to ensure the distribution level is considered in ongoing and future EU initiatives. Eventually, with the conclusion of the Grid Action Plan (GAP) in June 2025, DSO Entity also successfully completed its assignments with actions falling under the scope of all KSS25's three tracks and will continue to work on ongoing mandated tasks in 2026.

## **Growing importance and benefits of Knowledge Sharing and connection with Communication Strategy**

**2025 marked an intensification of efforts to develop DSO Entity into the European platform of expertise on and for DSOs.** DSO Entity is growing as a forum of expertise and knowledge on DSOs (pursing the work started in 2024 and intending to maintain this ambition in the future KSS26). This highly contributed to further disseminating key messages on the relevance of DSOs for the EU's competitiveness and energy security, translating the core technical work of EG/TFs and sharing DSO Entity's Technical Vision across 2025.

The KS work carried out in 2025 continue to **demonstrate the benefits of this pillar for DSO members** as they can learn, exchange and share expertise, data and good practices on technical topics relevant for DSOs while gaining in parallel an increasing understanding of EU-level developments. The strong connection with the Communication Strategy ensured **a growing member outreach and involvement** by strengthening internal communications (i.e., a monthly newsletter, several Radar News editions, and new dedicated KS website page), organising internal webinars that allowed all members to directly interact with DSO Entity's experts on ongoing technical work, launching campaigns (e.g. campaign introducing the new KS website page in September-October) and assuring the presence of DSO Entity members and experts in different European events (e.g. European Commission's Fora<sup>1</sup>).

Furthermore, KSS25 increased the **opportunities for DSO Entity to connect, exchange and share technical expertise and practices on distribution grids with external stakeholders** ensuring further awareness on the role and relevance of DSOs and cooperation to achieve the energy transition and enhance EU's competitiveness and resilience. This was done through event organisation and participation (e.g., Breakfast Event together with the four other DSO associations at the European Parliament in January), sharing of expertise (e.g. a new DSO Entity Brief tool), as well as cooperation and dialogue with partners in relation to relevant workstreams (e.g., Technopedia with ENTSO-E in April, joint roadmap on future-proof grids related to the GAP Action Point 13 in June; joint webinar with ENTSO-E on flexibility needs assessment methodology in April). DSO Entity also continued to reinforce its online presence by engaging in social media platforms and launching a new KS page on its website.

---

<sup>1</sup> Participating and contribution in the Copenhagen Infrastructure Forum, the Florence Electricity Forum, the Madrid Gas Forum.

### **Country Expert Group (CEG)'s pivotal role in delivering Knowledge Sharing Strategy 2025**

With one DSO representative for each country, the CEG constitutes a body of expertise and knowledge well-suited to **map Europe's current state of play, collect data and good practices on DSOs from all Member States**. In 2025, the CEG:

- Led the development of **two strategic reports on the relevance of DSOs for the EU's competitiveness** (September; accessible [here](#)) **and energy security** (to be published early 2026) as some of the main KS milestone projects under the KSS25's second track.
- Remained in the **lead on the permitting topic**, supporting the delivery of the related Action Points 11 and 12 of the GAP with the publication of a paper (January; accessible [here](#)) and response to EU consultation (August).
- Supported activities related to enhancing **public engagement** as part of DSO Entity's involvement as signatory of the Pact for Engagement and related assignment from the Copenhagen Forum.
- Supported the **delivery of the GAP's Action Point 13 on supply chain**.
- Collected **DSO data and good practices pertaining competitiveness and resilience**.

## Report on KSS25 three core tracks

The blocks below provide a detailed overview per track of the deliverables achieved in 2025.

### TRACK 1: Dissemination of Technical Vision



#### Track

**Objective:** Disseminating and further building upon DSO Entity's Technical Vision.

The publication of the **Technical Vision was the KSS24 flagship project**, and DSO Entity worked to disseminate its outcomes and further build upon them across 2025 (more details available [here](#)).

#### Deliverable

- **(14/01) Technical Vision** (*accessible [here](#)*): The full Technical Vision was unveiled in early 2025. It provides the joint and common vision of European DSOs for the future of the EU's energy system through a customer-centric approach. It describes how a fully decarbonised energy system will differ from the current system, outlines which key characteristics will have to be adapted from a DSO perspective to be able to deliver on the EU's net-zero targets and provides recommendations to ensure the right conditions are set.
- **(27/03 and 09/04) Let's Connect Brochure and Factsheet** (*Brochure accessible [here](#) and Factsheet [here](#)*): These two documents show the relevance of DSOs as key enablers for a clean, competitive and secure Europe, and shares key facts and figures on DSOs and highlight their remaining challenges and recommendations.
- **(04/04) Webinar "How does DSO Entity's Technical Vision match with the EU's priorities for 2025+?"** (*more [here](#)*): The webinar presented the key-findings of the Technical Vision, and its relevance for the political discussion at the EU level.



### TRACK 2: Raising awareness on DSO relevance for a clean, competitive and secure Europe

#### Track

**Objective:** Sharing expertise, facts, figures and good practices on DSOs to increase the awareness on their relevance for the energy transition but also the EU's competitiveness and energy security contributing to the discussion at the EU level in the context of the Clean Industrial Deal.

The Country Expert Group played a key role in implementing Track 2 (see Figure).

## Deliverables

- **(H2 2026) Resilience Report** (*to be published in February 2026*): The report explains the growing role of DSOs for security of supply and system stability as active system operators in coordination with TSOs in a changing energy system. It also shows their increasing relevance as critical entities when facing emerging challenges (e.g. cybersecurity and climate adaptation) and shares DSOs' needs with supporting practices to strengthen the resilience of grid infrastructure and ensure overall security of the EU's energy system.
- **(September) Competitiveness Report** (*accessible [here](#)*): The report explains the connection between grid investments, energy prices and electricity bills, shows why investing in electricity grids is a no-regret option and vital to ensure a thriving economy and further shares key measures to ensure affordable electricity.
- **(09/04) Breakfast Event 'No grids, no glory: why investing in grids is pivotal for a thriving EU economy'**: The event shed light on the relevance of grids and discussed measures needed to support the EU's economy by investing in grids while keeping energy prices low.

## TRACK 3: DSO Entity as a Platform of Expertise for and on DSOs



## Track

**Objective:** Intensifying efforts to develop DSO Entity into the European platform of expertise for and on DSOs by raising awareness on and translating the core technical work of DSO experts.

Track 3 was implemented with strong link to the different EG/TFs activities, including the Grid Action Plan's delivery, as to further share their expertise and good practices.

## Deliverables

- **(29/04) Launch of the Technopedia Platform with ENTSO-E** (*platform accessible [here](#)*): Developed as part of the GAP's delivery, the platform features detailed descriptions of technologies available to system operators, along with use cases and deployments from across Europe. It is open to contributions from stakeholders who can submit applications on specific use cases. The platform allows system operators to explore how others are leveraging various technologies, sharing good practices, and adopting similar solutions in their own grids.
- **(September) Launch of the KS website page** (*accessible [here](#)*): The KS page makes available key publications, DSO Entity's insights on EU developments relevant to distribution grids, event recordings, facts and figures on DSOs with relevant infographics, and the EU DSO map (launched in 2024).
- **(across 2025) Delivery of KS activities of EG/TF Work Programmes:** Organisation of internal and public webinars (recordings accessible on DSO Entity's website), publication of reports and papers, and building of exchange and cooperation with main partners (European Commission, ACER, ENTSO-E) and other stakeholders. More details can be found in the dedicated Chapter 3.

## Report on Communication core activities

The last table below provides insights into the KPIs coming from the communication activities that were carried out in support of the KSS 25 and to promote the work of the EGs and TFs.



Figure 3: DSO Entity communication main KPIs<sup>2</sup>

As shown in the Figure, DSO Entity's Communication Strategy aimed at integrating all pursued activities into the various communication channels to maximise the visibility of projects, documents and news. Beyond the macros reporting for the website, newsletter, and social media outreaches, it is important to focus on disseminating the main activities (e.g., Technical Vision, public consultations, strategic reports and core documents produced by EGs and TFs).

Regarding external contributions, DSO Entity representatives participated in a total of 62 events, of which 48 were stakeholder events where our members presented our priorities and main activities; 12 were organised by the Secretariat (e.g., Annual event, Annual Plan presentation, informative sessions on grids with decision-makers such as MEPs and webinars); 22 represent our participation in high-level events mainly organised by the European Commission and Council's presidencies (e.g., Fora, PCI Energy Days and EUSEW); and, lastly, 11 events in which DSO Entity's President Vincenzo Rainieri joined for high-level interventions.

In respect to public consultations, DSO Entity took part in the launch of three public consultations in cooperation with ENTSO-E (i.e. definition of the type and format of data, and the methodology for the analysis by transmission system operators and distribution system operators of the flexibility needs at

<sup>2</sup> These KPIs include the work of all DSO Entity's bodies, thus, resulting in higher KPI-numbers than shown in the overview of the EG/TFs in chapter 2.

national level and Cyber Risk Assessment Methodology). DSO Entity also provided 12 replies to public consultations organized by the European Commission (e.g., to the targeted stakeholder consultation on the Grids Package, the Citizens Energy Package or Electrification Action Plan).

Lastly, DSO Entity published a total of 22 documents including reports, joint statements in cooperation with other relevant partners and stakeholders, and other projects.

### 3.2. The Grid Action Plan

The Grid Action Plan (COM/2023/757), presented in November 2023 by the European Commission, identified seven challenges faced by grids in delivering on the net-zero targets. The Communication further proposed 14 Action Points that should support grids in overcoming such challenges to be implemented over the next 18-months. The text was a milestone for the recognition of grids, and especially of the distribution level, in reaching the European Union’s climate and green objectives.

DSO Entity appeared as key actor of the Action Plan, being directly responsible for the delivery of 7 out of 14 of the Action Points, often together with ENTSO-E, and in a supporting role for several others.

While DSO Entity delivered all assigned Action Points on time it became apparent that several deliverables were transformed into permanent tasks continuing well beyond the official due date. Already at the Copenhagen Infrastructure Forum in 2024, after DSO Entity had delivered on first Action Points, follow-up actions were defined and assigned. This approach is visible on topics such as network development planning, transparency on grid hosting capacities as well as for the cooperative approach for supply chains and the close engagement between the public and stakeholders via the Pact for Engagement. Therefore, some Action Points could already be completed in 2024 as the work on others continued in 2025. The achieved progress and results were presented at the 11th Energy Infrastructure Forum in Copenhagen on 2-3 June 2025.

The table below gives a concise overview of the work done in relation to the GAP in 2025. More details on the delivery for each action can be found in the reports of the different Expert Groups and Task Forces.

**A holistic overview of DSO Entity’s delivery of the Grid Action Plan since 2023 and beyond 2025 is provided in the publication [“Delivering the Grid Action Plan – DSO Entity’s role and takeaways”](#).**

■ Tasks not directly assigned by DSO Entity in the Grid Action Plan.

Challenge	Action Point	Leading EG/TF	Delivered tasks and ongoing activities
Challenge 2	A3 (a)	TF NP	○ Publication of <a href="#">“DSO Entity Key Messages on DNDPs”</a> (09/25)

**Improving long term grid planning for a higher share of RES and increased electrification:** Need for long term visibility of network needs, especially at DSO-level, is highlighted, as well as the importance of better support for PCI applications for smart grids projects.

**Challenge 3**

**Introducing regulatory incentives for forward looking grid build-out:** Need for a supportive regulatory framework bringing investment certainty and recognising the importance of anticipatory investments & accounting for both CAPEX and OPEX in network tariffs, is stressed

**Challenge 4**

**Incentivising a better usage of the grids:** More transparency on grid hosting capacities (capacity maps, frameworks for non-firm connection agreements etc.).

Support DSO grid planning by mapping the existence and characteristics of DSO development plans and by improving best practices and recommendations

**A3 (b)**  
Reinforce DSO Entity's support to the design and submission of PCI applications or smart grid projects

**A4**  
*(With ACER and ENTSO-E)* Support the EC in proposing guidance for conditions to approve anticipatory investments

**A6 (a)**  
*(with ENTSO-E)* Agree on harmonized definitions for available grid hosting capacity for SOs and set a pan-EU overview

**A6 (b)**  
*(with ENTSO-E)* Issue guidance and recommendations to digitalise and streamline

TF FIN

TF FIN

EG DF

TF  
DESAP

- o *Follow up assignments on this topic were provided from the Copenhagen Forum 2025.*

- o Responses to EC-consultations on CEF-E funding and on the design of the next [Multiannual Financial Framework \(MFF\)](#) (08/25)
- o Paper "[EU Funding opportunities and challenges](#)" (06/25)

- o Paper "[Anticipatory Investments – An initial Regulatory Discussion](#)" (02/25)
- o Paper "[DSOs' access to finance: Barriers and potential facilitation mechanisms](#)" (06/25)

- o Preparations for the Capacity-  
pedia website to be live in 2026
- o *Follow up assignments on this topic were provided from the Copenhagen Forum 2025.*

- o Paper "[Digital solutions for handling connection requests](#)" (10/25)
- o Response to the EC's [consultation on Grid Connection](#) (08/25)

Insufficient smart grids incentives (e.g. insufficient OPEX compensation; rising digitalisation costs, data processing, flexibility procurement)

procedures for grid connection requests

**A7**  
(with ENTSO-E) DSO Entity, with ENTSO-E, to promote smart grid uptake, network efficiency & innovative technologies, and to update the Technopedia

TF  
DESAP

- o Launch of the [DSO/TSO Technopedia platform](#)
- o Follow up assignments on this topic were provided from the Copenhagen Forum 2025.

**A8** ■  
ACER, in its tariff report, to recommend best practices in relation to the promotion of smart grids and network efficiency technologies through tariff design, focusing on the consideration of OPEX in addition to CAPEX and benefit sharing

TF FIN

- o Preparation of paper “[Tariffs and incentives: a premier for the future](#)” (01/26)

**Challenge 5**

**Improving access to**

**finance:** Need to raise awareness

on EU funding opportunities, especially for DSOs, is in the focus. The unprecedented increase in the volume of capital expenditure of DSOs affects key financial performance indicators such as credit ratings. Need for tailor-made financing products to support grids

**A9** ■  
EC to identify tailored financing models and strengthen dialogue to address obstacles to private financing (Investors Dialogue - ID)

TF FIN

- o Presentation of the outcome of the ID-E WG Transmission and Distribution at the 3rd plenary meeting (02/25)
- o Workshop on blended finance including EIB and EBRD) (04/25)
- o Paper on [Innovation for regulated companies](#) (06/25)

**A10 (a)**  
Raise awareness on the available options to increase funding applications for DSOs

TF FIN

- o Refer to Action Point 3 (b) above
- o Paper “[EU funding opportunities and challenges](#)” (06/25)

## Challenge 6

### Accelerating deployment through faster permitting and public engagement:

Focus is on supporting the acceleration of permitting over long distances and crossing several jurisdictions, & constraints in staffing and digitalisation of the competent authorities

## Challenge 7

### Strengthening grid supply chains: Lead times for procuring specific grid

components are increasing due to a growth in global demand but also divergency in product specificities. Further concerns regarding reliance on high-risk third country suppliers for critical components, insufficient access to raw materials and staff shortages aggravate the situation.

#### A11

EC to support permitting acceleration, among others EC will support application of permitting rules in RED/emergency regulation (overriding public interest) as regards DSOs

CEG

- Publication of a paper "[Guidance on EU permitting-related provisions on grid and renewable energy projects](#)" (09/01/25)
- Intensification of exchanges with the EC, in two dedicated Implementation Dialogues (04/25 and 06/25)
- Response to the consultation on the [simplification of environmental assessment permitting](#).

#### A12

DSO Entity with ACER, ENTSO-E and RGI to sign the Pact for Engagement to reinforce stakeholder engagement

CEG

- *Participation to the Pact and DG ENER's dedicated focus group on Public Engagement Plans*
- *Follow up assignments on this topic were provided from the Copenhagen Forum 2025.*

#### A13 (a)

(With ENTSO-E) DSO Entity, with ENTSO-E, to collaborate with technology providers to develop standard technology specifications.

Multiple

- Regular meetings between DSO Entity, ENTSO-E, Europacable and T&D Europe at both Secretariat and experts' levels.
- Publication of a "[joint roadmap towards future proof grids](#)" with ENTSO-E, T&D Europe and Europacable
- *Follow up assignments on this topic were provided from the Copenhagen Forum 2025.*

#### A13 (b)

Develop mechanisms for providing increased visibility to manufacturers into their upcoming procurement plans for equipment and systems on all voltage levels

- Joint Paper "[DSOs and the supply chain challenge](#)" with E.DSO
- *Follow up assignments on this topic were provided from the Copenhagen Forum 2025.*

### 3.3. The integration of gas DSOs into DSO Entity

The Decarbonised Gas and Hydrogen Market Regulation (2024/1789) sets up a framework for integrating gas and hydrogen DSOs within DSO Entity (Art. 39-41) This means that DSO Entity will be the sole DSO organisation developing Network Codes together with its respective TSO counterparts ENTSO-E (electricity), ENTSO-G (gas) and the newly created ENNOH (hydrogen).

The enlarged membership and tasks will strengthen the visibility of DSOs on European level to the benefit of all DSOs. Thus, this development is highly relevant for the more than 1.100 DSOs in the EU that distribute gas to more than 90 million customers on a daily basis. Part of these are dual grid companies that already are a member of DSO Entity in their electricity grid operations.

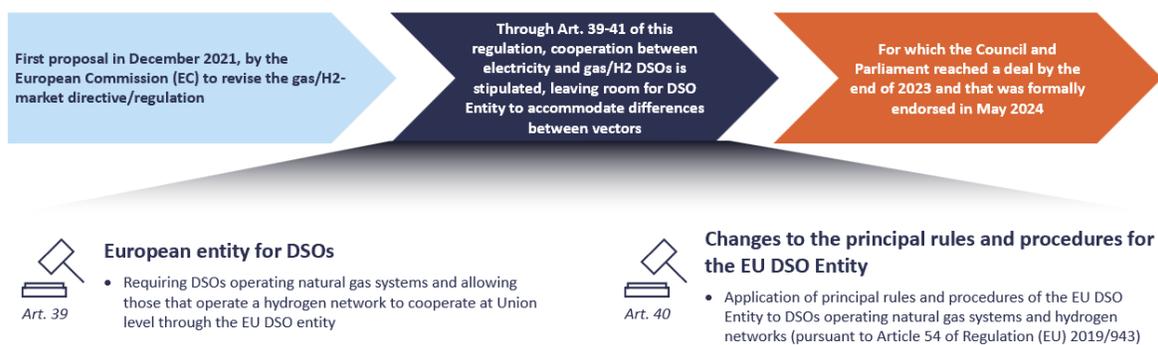


Figure 4: The new gas regulation stipulates the cooperation of gas/H2 DSOs through EU DSO Entity

#### Building a new joint governance and structure

Already before the adoption of the Gas Regulation, DSO Entity's Board started discussing the integration of gas and hydrogen DSOs in early 2024. A working structure was established for joint preparation of the future structure, in close cooperation with various associations: GEODE, CEDEC, Eurogas and GD4S.

The drafting efforts included updating statutes, proposing rules for fair and balanced representation, and creating operational budgets. By involving experts and stakeholder representatives, the process aimed to balance compliance with efficiency. After extensive dialogue sessions and negotiations, the amended draft statutes were approved by the Board and the General Assembly in October. After that, the statutes were submitted to ACER and to the European Commission for their review and feedback, which is anticipated to be ready in the coming months.

This new structure, in fact, creates a fundamentally revised governance model for DSO Entity in order to accommodate the challenge that comes with the integration of gas and hydrogen DSOs. On the one hand, this challenge is related to the **wide diversity** of the extended DSO-community in size, geographic background and type of DSO (single E or G or dual grid). On the other hand, the **substantial extension** with some 400 members (+ 50%) and some 87 million connections (+ 30%) implies focused efforts on structuring and operating the extended member base. Thirdly,

the **level and complexity of coordination** substantially increase, both internally and externally (like with ENTSO-E, ENTSO-G and ENNOH), requiring higher standards for example Board and Secretariat. The new structure is meant to comprise an extension of the Board, a specific way for decision making between vectors if no consensus can be achieved, the establishment of Councils for both electricity and gas to prepare decision making in the Board and the integration of gas representatives in SAG, CEG and technical Expert Groups.

**Official Launch in 2026**

While in 2025 great efforts were made regarding the integration of gas, the official integration is anticipated for Q1/2026 and the operational launch is foreseen in Q2/2026. By this point, the integrated DSO Entity will include both electricity and gas members, with a strong governance structure for representation and decision making, clear roles, an extended team at the Secretariat and a unified approach to addressing Europe’s energy transition challenges.

## 4. Summary

In 2025, DSO Entity continued the delivery of its enlarged mandate through its three core pillars, while advancing on the integration of gas and hydrogen DSOs into DSO ENTITY. The organization’s work is guided by the EU DSO Entity Technical Vision, which provides a holistic and customer-centric perspective on the future European energy system and serves as the overarching framework for all technical activities

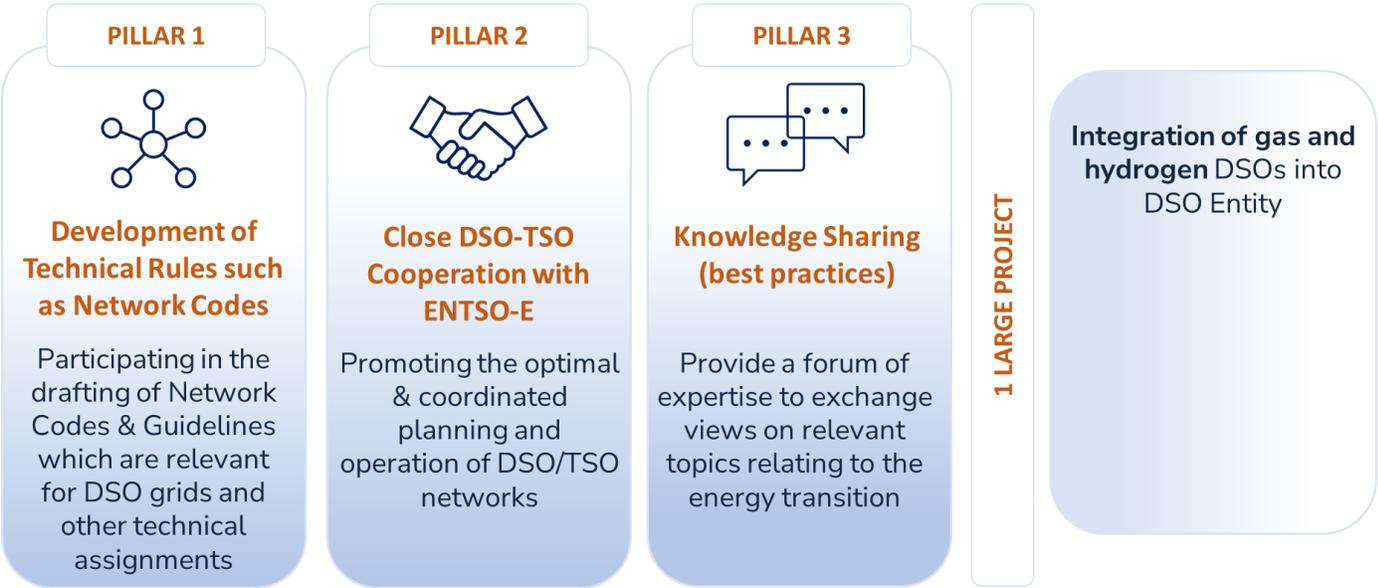


Figure 5: Delivered work priorities 2025: three pillars and one project

<p style="text-align: center;"><b>Overview of core deliverables in 2025 in the three pillars</b></p>	
<b>Pillar 1:</b>	<p>DSO Entity’s EG and TFs delivered substantial progress on the development, implementation, and monitoring of European technical rules, methodologies, and guidance relevant for DSOs. Key achievements in 2025 included advances on cybersecurity risk assessment methodologies and cyber-attack classification scales, continued work on the Network Code on Demand Response, submission and adoption of the Flexibility Needs Assessment Methodology, and important contributions to data interoperability implementing acts through the Joint Working Group with ENTSO-E.</p> <p>Further technical work covered engagement in the revision of existing grid connection network codes, development of guidance on grid forming capabilities, progress on smart grid indicators and digital twin concepts, improvements in distribution network development planning practices, and analysis of regulatory, tariff, financing, and funding frameworks to support the growing investment needs of DSOs. Together, these activities contribute to building a secure, flexible, digitalised, and efficient distribution system capable of supporting large-scale integration of renewables and new energy uses</p>
<b>Pillar 2:</b>	<p>Close cooperation with ENTSO-E remained a cornerstone of DSO Entity’s work and intensified further in 2025. Fourteen joint working groups and their dedicated stakeholder platforms supported coordinated TSO–DSO contributions to network codes, methodologies, and guidance. In parallel, cooperation among the representatives of both associations’ Boards of Directors strengthened under the Joint Work Programme.</p>
<b>Pillar 3</b>	<p>Knowledge sharing and communication continued to be essential enablers of DSO Entity’s technical work. Through its three-track Knowledge Sharing Strategy, DSO Entity intensified internal and public webinars, published reports and papers, and expanded internal communication tools and public-facing content. These activities increased member involvement, facilitated exchange of good practices, and strengthened awareness of the role, relevance, and diversity of DSOs.</p> <p>The Country Expert Group played a pivotal role by collecting national data and good practices, supporting work on permitting, grid connections, and supply chains, and contributing to the delivery of Grid Action Plan-related activities.</p>

The 2025 reporting year demonstrates DSO Entity’s growing maturity as a technical coordinator, policy contributor, and knowledge hub. Through strong cooperation, high-quality technical deliverables, and structured knowledge sharing, DSO Entity is laying robust foundations for a resilient, secure, and future-proof European energy system.

## List of abbreviations

ACER	The European Union Agency for the Cooperation of Energy Regulators
CAPEX	Capital Expenditures
CEER	The Council of European Energy Regulators
CEG	Country Expert Group
DESAP	Digitalisation of the Energy System: Action Plan
DSO	Distribution System Operator
DT	Digital Twins
EC	European Commission
EG CS	Expert Group Cybersecurity
EG DF	Expert Group Distributed Flexibility
EG DI	Expert Group Data Interoperability
EG ExNCC	Expert Group Existing Network Codes
EG	Expert Group
EMD	Electricity Market Design
ENCS	The European Network for Cyber Security
ENTSO-E	European Network of Transmission System Operators for Electricity
ESC	European Stakeholders Committee
FF55	Fit for 55 package
F-gases	Fluorinated Greenhouse gases
MS	Member States
NCCS	Network Code Cybersecurity
NCDR	Network Code on Demand Response
NZIA	Net-Zero Industrial Act
OPEX	Operating Expenses

PCI	Project of Common Interest
RED	Renewable Energy Directive
RES	Renewable Energy Source
RfG	Requirements for Generators
RGI	Renewable Grid Initiative
SEEG	Smart Energy Expert Group
SGI	Smart Grid Indicators
SOGL	System Operation Guideline
TCMs	Terms Conditions and/or Methodologies.
TF	Task Force
TF DESAP	Task Force Digitalising the Energy System - Action Plan
TF TYNDP	Task Force Ten Year Network Development Plan
TSO	Transmission System Operator
TYNDP	Ten Year Network Development Plan

**Annex: Overview of DSO Entity’s mandated tasks and its delivery in the AR25**

**(A) Mandated tasks from legislative acts**

1. *Electricity Market Regulation (2019/943/EU)*

<b>Article 55: Tasks of DSO Entity</b>	
<b>Legal text</b>	<b>Reporting</b>
<b>(1) The tasks of the DSO Entity shall be the following</b>	
(a) Promoting operation and planning of DSO in coordination with the operation and planning of transmission networks;	<p>Chapter 2.6, TF NP (Work Areas 1 &amp; 2): Mapping of existing DNDPs, identification of good practices, and exchanges with ENTSO-E on DNDPs, TYNDP and joint network development.</p> <p>Chapter 2.2, EG DF (Work Area 2): Development and submission of the Flexibility Needs Assessment Methodology (FNAM) with ENTSO-E; monitoring of implementation.</p> <p>Chapter 3.2, Grid Action Plan (Action Point 3): Support to DNDP good practices and coordinated planning.</p>
(b) facilitating the integration of RES, distributed generation and other resources embedded in the distribution network such as energy storage;	<p>Chapter 2.2, EG DF (Work Areas 1, 3 &amp; 4): NC Demand Response development and monitoring; implementation of Action 6 of the Grid Action Plan on hosting capacity; knowledge-sharing on distributed flexibility.</p> <p>Chapter 2.4, EG Existing Network Codes (Work Areas 1–3): Follow-up on grid connection NCs, guidance on grid-forming capabilities, and certification schemes for EVs and heat pumps.</p>

	Chapter 2.5, TF DESAP (Work Areas 3 & 4): Digitalisation and streamlining of grid connection requests; DSO/TSO Technopedia.
(c) facilitating demand side flexibility and response and distribution grid users' access to markets	Chapter 2.2, EG DF (all Work Areas): <ul style="list-style-type: none"> <li>• Development and monitoring of NC Demand Response;</li> <li>• Support to Demand Response European Stakeholder Group;</li> <li>• Flexibility Needs Assessment Methodology;</li> <li>• Best-practice report and webinars on distributed flexibility.</li> </ul>
(d) contributing to the digitalisation of distribution systems including deployment of smart grids and intelligent metering systems;	Chapter 2.3, EG DI (Work Areas 1–4): Joint Working Group deliverables on interoperability, common repository.  Chapter 2.5, TF DESAP (Work Areas 1–4): Smart Grid Indicators, Digital Twin concepts and roadmap, digitalisation of grid connection requests, and Technopedia.
(e) supporting the development of data management, cyber security and data protection in cooperation with relevant authorities and regulated entities;	Chapter 2.1, EG Cybersecurity (Work Areas 1–6): <ul style="list-style-type: none"> <li>• Cybersecurity Risk Assessment Methodologies;</li> <li>• Cyber-attack classification scale;</li> <li>• Provisional list of standards and controls;</li> <li>• Feasibility study for common tool;</li> <li>• Business continuity management;</li> <li>• Knowledge-sharing deliverables.</li> </ul> Chapter 2.3, EG DI (Work Area 1): Data transparency cooperation within the Joint Working Group.

<p>(f) participating in the development of network codes which are relevant to the operation and planning of distribution grids and the coordinated operation of the transmission networks and distribution networks pursuant to Article 59.</p>	
<p><b>(2) In addition the EU DSO Entity shall:</b></p>	
<p>(a) cooperate with the ENTSO for Electricity on the monitoring of implementation of the network codes and guidelines</p>	<p>Chapter 2.1, EG Cybersecurity (Work Areas 2 &amp; 4): NCCS implementation and feasibility study for common tool.</p> <p>Chapter 2.4, EG Existing Network Codes (Work Areas 4–7): Continuous interaction in European Stakeholder Committees and stakeholder collaboration.</p>
<p>(b) cooperate with the ENTSO for Electricity and adopt best practices on the coordinated operation and planning of transmission and distribution systems including issues such as <b>exchange of data between operators and coordination of distributed energy resources</b></p>	<p>Chapter 2.2, EG DF (Work Area 2): Joint FNAM with ENTSO-E.</p> <p>Chapter 2.6, TF NP (Work Area 2): Joint distribution and transmission system development.</p> <p>Chapter 2.5, TF DESAP (Work Area 2): Digital Twin of the European electricity grid.</p>
<p>(c) work on identifying <b>best practices</b> on the areas identified in paragraph 1 and for the introduction of energy efficiency improvements in the distribution network;</p>	<p>Chapter 2.2, EG DF (Work Area 4): Report on Best Practices on Distributed Flexibility.</p> <p>Chapter 2.6, TF NP (Work Areas 1 &amp; 4): DNDP good practices and knowledge-sharing.</p> <p>Chapter 2.5, TF DESAP (Work Areas 1 &amp; 3): Smart Grid Indicators and digital grid connection practices</p>

(d) adopt an annual work programme and an annual report;	Publication of 2025 Annual Work Programme. Adoption of Annual Report 2025.
(e) operate in accordance with competition law and ensure neutrality.	Compliance ensured through governance and internal procedures.
<b>Article 60: Amendment of Network Codes (DSO Entity related)</b>	
<b>Legal text</b>	<b>Reporting</b>
(2) Persons who are likely to have an interest in any network code adopted under Article 59, including the ENTSO for Electricity, the EU DSO entity, regulatory authorities, transmission system operators, distribution system operators, system users and consumers, may propose draft amendments to that network code to ACER. ACER may also propose amendments on its own initiative.	Chapter 2.4, EG Existing Network Codes (all Work Areas): Technical feedback, consultation responses and stakeholder coordination on amendments to RfG, DC and HVDC and interaction with NC DR
(3) ACER may make reasoned proposals to the Commission for amendments, explaining how such proposals are consistent with the objectives of the network codes set out in Article 59(3) of this Regulation. Where it considers an amendment proposal to be admissible and where it proposes amendments on its own initiative, ACER shall consult all stakeholders in accordance with Article 14 of Regulation (EU) 2019/942.	

2. *Electricity Market Design reform; Regulation (EU/2024/1747) amending Regulation (2019/943/EU)*

<b>Article 19e: Assessment of flexibility needs (FNA)</b>	
<b>Legal text</b>	<b>Reporting</b>
(6) By 17 April 2025, the ENTSO for Electricity and the EU DSO entity shall jointly submit to ACER a proposal regarding the type of data and format to be submitted to a regulatory authority or another authority or entity designated pursuant to paragraph 1, and the methodology for the analysis of the flexibility needs referred to in paragraph 4. Within three months of receipt of the proposal, ACER shall either approve the proposal or amend it. In the latter case, ACER shall consult the Electricity Coordination Group, the ENTSO for Electricity and the EU DSO entity before adopting the amendments. The adopted proposal shall be published on ACER's website.	Chapter 2.2, EG DF (Work Area 2): Joint FNAM developed, consulted, submitted to ACER and adopted.

3. *Implementing Regulation (2023/1162/EU) on interoperability requirements and non-discriminatory and transparent procedures for access to metering and consumption data*

<b>Article 11: Cooperation on data transparency between the EU DSO entity and the ENTSO for Electricity</b>	
<b>Legal text</b>	<b>Reporting</b>
(1) The cooperation foreseen between the European Network of Transmission System Operators for Electricity (the 'ENTSO for Electricity') and the European Entity for Distribution System Operators (the 'EU DSO entity'), in Article 30(1) points (g) and (k) and Article 55(1) points (d) and (e) of the Regulation (EU) 2019/943, may take the form of a Joint Working Group setting up a process to collect and publish national practices provided by the Member States. ENTSO for Electricity and EU DSO entity may in that way also cooperate to advise and support the Commission in monitoring the implementation of, and further developing	Chapter 2.3, EG DI (Work Area 1): Joint Working Group and Task Forces; common repository; guidance and implementing acts.

<p>the implementing acts on data interoperability under Article 24(2) of Directive (EU) 2019/944.</p>	
<p>(2) While preparing their advice and undertaking their supporting activities to the Commission, the ENTSO for Electricity and EU DSO entity cooperate closely with representatives of national regulatory authorities, competent authorities and regulated entities with institutional roles at national level regarding the right to access to metering and consumption data, as well as with all relevant stakeholders, including consumer associations, electricity retailers, European standardisation organisations, service and technology providers, and equipment and component manufacturers.</p>	
<p><b>Article 12: Tasks under the EU DSO entity and ENTSO for Electricity cooperation on data transparency</b></p>	
<p><b>Legal text</b></p>	<p><b>Reporting</b></p>
<p><b>(1) In order to ensure transparency of access to data across the EU, the main tasks that ENTSO for Electricity and the EU DSO entity perform under their cooperation on data transparency shall include</b></p>	
<p>(a) developing guidance to assist Member States in the report of national practices as set out in Article 13;</p>	<p>Chapter 2.3, EG DI (Work Area 1): Guidance for mapping national practices; collection and publication of reports</p>
<p>(b) collecting the reports of national practices provided by Member States regarding the implementation of the reference model, as set out in Article 10;</p>	
<p>(c) publishing the reports of national practices in a publicly available repository which shall be kept up to date.</p>	
<p>(2) The ENTSO for Electricity and the EU DSO entity may also cooperate in assisting the Commission, following the process set out in paragraph 2 of Article 11, in the monitoring of the implementation of the reference model included in this Regulation and its further development as a result of regulatory, market or technology changes, and support the Commission, upon its request, in developing, as part of future implementing acts,</p>	<p>- Chapter 2.3, EG DI (Work Area 1): Draft of Implementing Act on Demand Response submitted to the European Commission (12/25 ).</p>

interoperability requirements and nondiscriminatory and transparent procedures for access to data required for customer switching, demand response, and other services referred to in Article 23(1) of Directive (EU) 2019/944.	
---	--

4. *Decarbonised Gas and Hydrogen Regulation (2024/1789/EU)*

<b>Article 39: DSO Entity for gas and hydrogen DSOs</b>	
<b>Legal text</b>	<b>Reporting</b>
<p>Distribution system operators operating a natural gas system shall and hydrogen distribution network operators operating a hydrogen network may cooperate at Union level through the EU DSO entity, in order to promote the completion and proper functioning of the internal market for natural gas, cooperate in the development of the hydrogen market and promote optimal management and a coordinated operation of distribution and transmission systems.</p> <p>Registered members may participate in the EU DSO entity directly or be represented by a national association designated by a Member State or by a Union-level association.</p> <p>The costs related to the activities of the EU DSO entity shall be borne by the distribution system operators and hydrogen distribution network operators that are registered members and shall be taken into account in the calculation of tariffs. Regulatory authorities shall approve costs provided that they are reasonable and proportionate and provide reasons where they are not approved.</p>	<p>- Chapter 3.3, Gas Integration: See report of Article 40 for work undertaken by DSO Entity.</p>

**Article 40: Changes to the principal rules and procedures for DSO Entity**

(1) The principal rules and procedures for the EU DSO entity pursuant to Article 54 of Regulation (EU) 2019/943 shall also apply to distribution system operators operating a natural gas system and hydrogen distribution network operators.

(2) The Strategic Advisory Group referred to in Article 54(2), point (f), of Regulation (EU) 2019/943 shall also consist of representatives of associations representing European distribution system operators operating a natural gas system or European hydrogen distribution network operators.

(3) By 5 August 2025, the EU DSO entity shall submit to the Commission and to ACER draft updated statutes, including a code of conduct, a list of registered members, draft updated rules of procedure, including rules of procedure on the consultation with the ENTSO for Electricity, the ENTSO for Gas and other stakeholders, and draft updated financing rules. The draft updated rules of procedure of the EU DSO entity shall ensure fair and balanced representation of all participating distribution system operators, including those owning or operating natural gas systems, and of hydrogen distribution network operators.

(4) Within four months of receipt of the documents submitted pursuant to paragraph 3, ACER shall provide the Commission with its opinion, after consulting organisations representing all stakeholders, in particular distribution system users, including customers.

(5) Within three months of receipt of ACER's opinion, the Commission shall issue an opinion on the documents submitted pursuant to paragraph 3, taking into account ACER's opinion referred to in paragraph 4.

- Chapter 3.3, Gas Integration: Creation of joint Task Forces, Sounding Committee, and preparation of updated statutes, rules of procedure and financing rules.

<p>(6) Within three months of receipt of the Commission’s positive opinion, the distribution system operators shall adopt and publish the EU DSO’s updated statutes, rules of procedure and financing rules.</p> <p>(7) The documents referred to in paragraph 3 shall be submitted to the Commission and to ACER where there are changes thereto or upon the reasoned request of either of them. The Commission and ACER may issue an opinion in accordance with the process laid down in paragraphs 3, 4 and 5.</p>	
---	--

**(B) List of non-legislative acts with additional assignments**

Assigned tasks based on non-legislative acts	
Non-legislative act	Reporting
EU Grid Action Plan (COM 2023/757/EU)	<p>Chapter 3.2: Full overview of Action Points.</p> <p>Chapter 2.2 EG DF: Action 6a (hosting capacity).</p> <p>Chapter 2.5 TF DESAP: Actions 6b &amp; 7 (digital connections, Technopedia).</p> <p>Chapter 2.6 TF NP: Action 3 (DNDPs).</p> <p>Chapter 2.7 TF FIN: Actions 8, 9, 10 (tariffs, financing, funding)</p>
Assignments from Copenhagen Forum Conclusions	<p>Chapter 2.5, TF DESAP (Work Area 1):</p> <ul style="list-style-type: none"> <li>• Contribution to Smart Grid Indicators concept and principles.</li> <li>• Input to CEER report and development of indicative list of input/output indicators.</li> </ul> <p>Chapter 2.5, TF DESAP (Work Area 2):</p> <ul style="list-style-type: none"> <li>• Joint work with ENTSO-E on Digital Twin of the European electricity grid:</li> <li>• Report on TSO-DSO challenges and opportunities.</li> <li>• Report on Digital Twin use cases and solutions.</li> </ul>

	<p>Chapter 2.6, TF NP (Work Area 1): DNDP good-practice paper responding to Copenhagen Forum conclusions on planning.</p>
<p>EU Action Plan on Digitalising the energy system (COM 2022/552/EU)</p>	<p>Chapter 2.5, TF DESAP (all Work Areas):</p> <ul style="list-style-type: none"> <li>• Smart Grid Indicators: principles and indicative indicator list.</li> <li>• Digital Twin of EU electricity grid: challenges, use cases, roadmap preparation.</li> <li>• Digitalisation of grid connection procedures.</li> <li>• Technopedia concept and implementation.</li> </ul> <p>Chapter 2.3, EG Data Interoperability:</p> <ul style="list-style-type: none"> <li>• Joint Working Group with ENTSO-E on data transparency.</li> <li>• Updated HEMRM.</li> <li>• Common repository for national reference models.</li> <li>• Draft Implementing Acts on interoperability (customer switching, demand response).</li> </ul>

**Broad overview of DSO Entity’s mandated tasks in legislative and non-legislative acts.**

CROSS-CUTTING MANDATE (IN REGULATION)			
Cooperation with ENTSO-E and TSOs		Identification and sharing of best practices	
NETWORK CODES (IN REGULATION)		TECHNICAL REGULATIONS (IA, DA)	
NC Cybersecurity ( <i>Implementation &amp; TCM development</i> )	NC Demand Response ( <i>Joint proposal submitted to ACER</i> )	Joint Working Group with ENTSO-E ( <i>IR on electricity metering and consumption data, IR on data for customer switching &amp; for DR</i> )	Participation in developing data reference models & requirements ( <i>EPBD and EMD data requirements for energy sharing and buildings</i> )
NCs Grid Connection ( <i>Amendment</i> )			
MANDATES FROM OTHER LEGISLATIVE ACTS		TASKS ASSIGNED IN NON-LEGISLATIVE ACTS	
Development of a methodology to assess flexibility needs w/ ENTSO-E ( <i>Electricity Market Regulation</i> )	Participation in TYNDP development scenarios ( <i>TEN-E Regulation</i> )	Development of Digital Twin & Smart Grid Indicators ( <i>Action Plan Digitalising the Energy System</i> )	Support of the delivery of seven of the 14 Action Points in the Grid Action Plan ( <i>EU Grid Action Plan</i> )
Integration of gas and hydrogen DSOs in DSO Entity ( <i>Gas Market Regulation</i> )		Deliverables on Network Development Planning, inputs on innovative regulatory approaches, development of EU catalogue of output indicators for smart grids ( <i>Copenhagen Forum 2024</i> )	Ad hoc requests for input and/or good practices on different topics from the EC

**Legend:**

- As provided by DSO Entity’s mandate (\*Electricity Market Regulation (2019/943/EU) /\*\* Electricity Market Directive (2019/944/EU)/Implementing Regulation)
- As provided by Implementing Regulations and other legislative acts under the scope of DSO Entity’s mandate
- As assigned by the European Commission in other non-legislative acts under the scope of DSO Entity’s mandate