

Brussels, 4 November 2025

To: European Commission - DG ENER  
attention of Mrs Ditte-Juul Joergensen, director-general  
cc. Mrs Mechthild Wörsdorfer, Director-General Deputy  
Mr Lukasz Kolinski, Director - Directorate C

To: ACER - Agency for the Cooperation of Energy Regulators  
attention of Mr Volker Zuleger, interim-director  
cc. Mr Christophe Gence-Creux - HoD/electricity  
Mrs Csilla Bartok - HoD/gas, hydrogen & retail

**Subject: Integration of gas/H2 DSOs into DSO Entity (EC Regulation 2024/ 1789, Art. 40)**

Dear Mrs Joergensen, dear Mr Zuleger,

With this letter, EU DSO Entity AISBL (hereafter referred to as 'DSO Entity') is pleased to submit, for your review, the draft updated Statutes and related material regarding the integration of natural gas/H2 DSOs into DSO Entity.

The Regulation on the internal markets for renewable gas, natural gas and hydrogen (EU) 2024/1789 (hereinafter referred to as "Gas Regulation") sets up a framework for integrating natural gas and hydrogen DSOs within DSO Entity (Art. 39-41). This means that DSO Entity has the challenge to turn itself into the sole DSO organisation developing Network Codes together with its respective TSO counterparts ENTSO-E, ENTSO-G and the newly created ENNOH.

Upon integration, the revised DSO Entity will include both electricity and gas/hydrogen 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. This will strengthen the visibility of DSOs on European level to the benefit of all DSOs, enabling them to play their key role in advancing energy transition.

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 collaborative working structure was established for a joint preparation of the future structure, in close cooperation with various associations representing gas/H2-DSOs: GEODE, CEDEC, Eurogas and GD4S. By involving experts and stakeholder representatives, the process aimed to balance compliance with efficiency.

After extensive dialogue sessions and negotiations that brought us slightly beyond regulatory timelines, the amended draft statutes were approved by the Board and the General Assembly in October 2025, also taking into account the support letter as received from the gas-associations. It is our view that the **compromise package** unites the very different positions and builds on the best support from existing and incoming members, whilst also accommodating the key dimensions for **fair and balanced representation** that are embedded in Regulation (EU) 2019/943 ("Electricity Market Regulation", the original base for DSO Entity) and in the Gas Regulation.

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 resp. 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 memberbase. Thirdly, the **level and complexity of coordination** substantially increases, both internally and externally (like with ENTSO-E, ENTSO-G and ENNOH), requiring higher standards for e.g. Board and Secretariat. The new structure is foreseen 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 gases to prepare decision making in the Board and the integration of gas representatives in Strategic Advisory Group, Country Expert Group and technical Expert Groups.

The official integration is anticipated for Q1/Q2 in 2026, naturally anticipating to receive, and where appropriate react to, the position you will provide.

Referring to Article 40 (3) of the Gas Regulation, we submit the following package for your review:

Statutes (attached separately):

- Draft updated Statutes,
- Draft updated Rules of procedure,

Other documents (attached separately):

- Draft code of conduct,
- Draft rules of procedure on the consultation with the ENTSO for Gas (and other stakeholders)
- Draft list of registered members,
- Draft updated financing rules.

Since last year, we have regularly updated the most involved members of the staff of DG ENER and ACER, both for electricity and for gas. In these updates, we addressed content, process and timeline as well as the challenges related to those dimensions. To facilitate an efficient start of this review, we have arranged for a further introduction meeting on 4 November 2025.

On behalf of DSO Entity, we remain at your disposal for any further question or suggestion.

Sincerely,

A handwritten signature in blue ink that reads "Peter Vermaat". The signature is written in a cursive style and is positioned above a horizontal line.

Peter Vermaat  
Secretary General  
EU DSO Entity AISBL