

Joint consultation response
by Open Grid Europe GmbH
and Thyssengas GmbH



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Gasunie Transport Services B.V.
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By email to:
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Essen/Dortmund, 27. November 2025

**Joint consultation response by Open Grid Europe GmbH and Thyssengas GmbH
on the draft Investment Plan 2026 of Gasunie Transport Services B.V.**

Dear Sir or Madam,

Many thanks for the opportunity to participate in the consultation process regarding the Investment Plan 2026 as published by Gasunie Transport Services B.V. (hereinafter: GTS) on 3 November 2025, which provides an overview of all planned expansion and replacement investments. Both, Open Grid Europe GmbH (hereinafter: OGE) and Thyssengas GmbH (hereinafter: TG), welcome the comprehensive investment planning by GTS and would like to specifically highlight the importance of the proposed investments at the interconnection points between the Netherlands and Germany in Zevenaar and Winterswijk.

Within the scenario framework of the German Network Development Plan (Netz-entwicklungsplan; NEP), as confirmed by the regulator BNetzA on April 30, 2025, the German transmission system operators have determined the demand for natural gas in 2030. Alongside declining natural gas demand for distribution networks, significant additional demand resulting from the conversion of lignite-fired power plants to gas-fired facilities and industrial demand must be considered. For this additional demand, OGE and TG have received various enquiries and expansion obligations in line with the Gas Network Access Regulation, which are concentrated in the Rhineland and Ruhr area. Being part of the scenario framework confirmation by BNetzA, the additional demand leads to a capacity balance deficit in 2030. One import means to compensate the disbalance between entry and exit capacities are additional entry capacities.

Joint assessments have shown that the utilisation of the existing infrastructure at the cross border points at Zevenaar and Winterswijk –used for L-gas transport until 2028/29– represent a cost-efficient and effective solution for addressing the increasing capacity demand. Both sides of the border benefit from well-established transport routes from entry points in the Netherlands to existing and upcoming demand at exit points in Germany. Therefore, it is advisable to continue utilising these existing infrastructures and to

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convert them from L-gas to H-gas, enabling a total additional H-gas capacity of 10 GW at the interconnection points in Zevenaar and Winterwijk.

For the reasons stated above, we fully support the inclusion of these investments – to equip the interconnection points – in the Investment Plan 2026 and are also pushing forward the necessary measures on our side in the German Network Development Plan. We are committed to engaging in trilateral discussions the determination of the most suitable next steps.

Please do not hesitate to contact us for any further questions.

Kind regards,

Open Grid Europe GmbH

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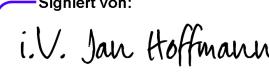
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