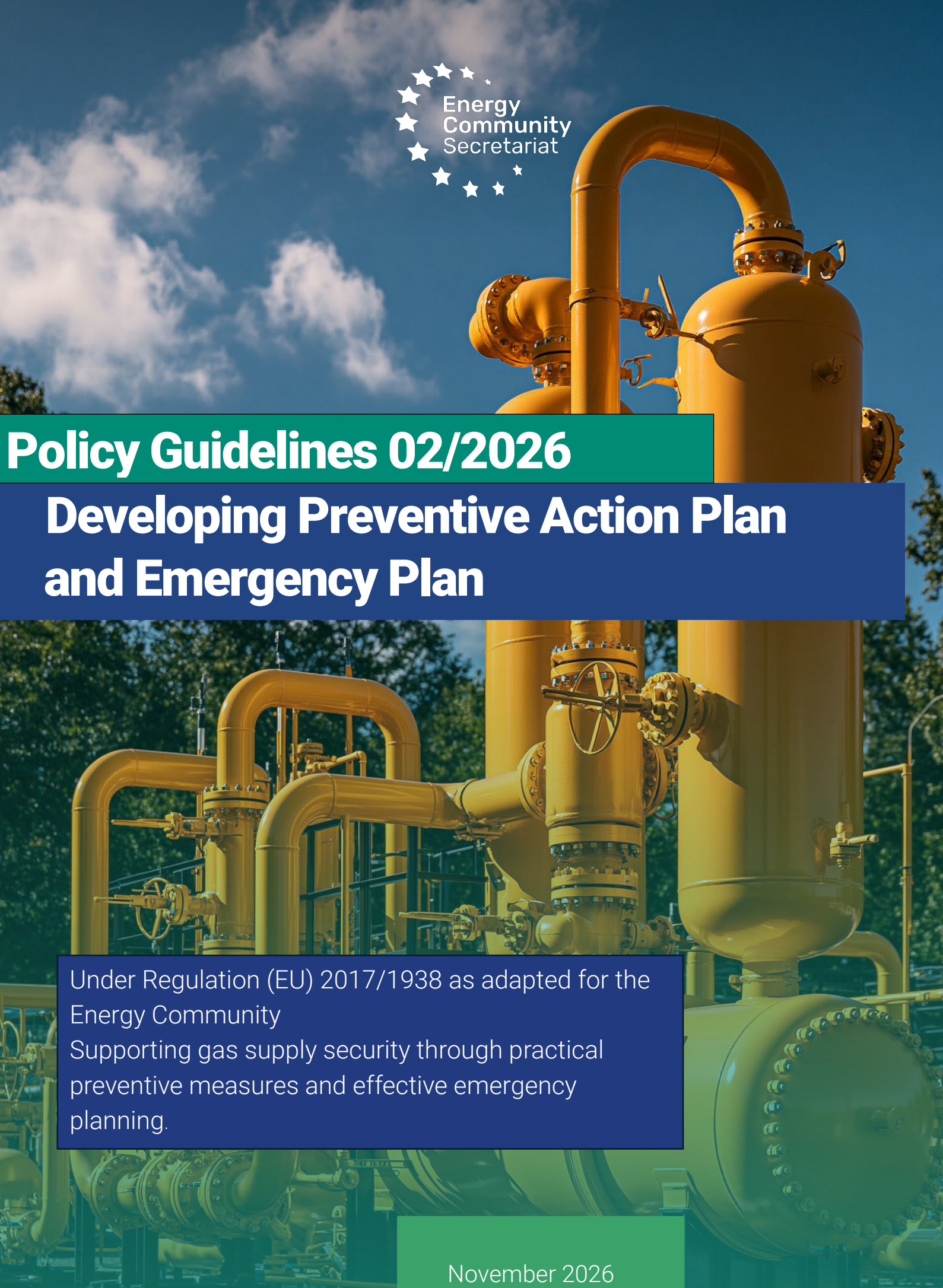


Energy Community Secretariat

Policy Guidelines 02/2026

Developing Preventive Action Plan and Emergency Plan

Under Regulation (EU) 2017/1938 as adapted for the Energy Community

Supporting gas supply security through practical preventive measures and effective emergency planning.

November 2026

Status and use of these Policy Guidelines

These Guidelines assist Energy Community Contracting Parties in preparing, implementing and updating Preventive Action Plans (PAPs) and Emergency Plans (EPs) under Regulation (EU) 2017/1938, as incorporated into and adapted for the Energy Community.

The Guidelines are non-binding. It explains how the legal requirements can be translated into coherent, evidence-based and operationally effective plans. It does not replace the applicable Ministerial Council decisions, the adapted Regulation or national implementing legislation. In the event of any inconsistency, the applicable legal provisions prevail.

The legal baseline includes Ministerial Council Decisions 2021/15/MC-EnC, 2022/01/MC-EnC and 2025/09/MC-EnC. Contracting Parties should verify subsequent amendments when preparing or updating their plans. Under this legal baseline, the temporary storage provisions identified in Article 22 apply until 31 December 2027. Storage-related guidance should therefore be read in conjunction with the provisions applicable at the time of preparation or implementation of the plans.

In the Guidelines, **"must"** identifies a legal requirement, subject to its applicability and any relevant exception or derogation. **"Should"** identifies recommended practice. References to articles and annexes refer to the Energy Community adapted Regulation unless otherwise indicated.

PAPs and EPs must be developed in accordance with the templates in Annexes VI and VII respectively. The Policy Guidelines explains the drafting process, it does not replace those mandatory plan structures or introduce additional submission templates. Contracting Parties should tailor the level of detail, supporting analysis and operational arrangements to their national circumstances while addressing all applicable legal requirements.

The Guidelines should be maintained as a living document. Its application should be reviewed in light of legal amendments, Secretariat assessments, exercises and operational experience.

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Background

The security of natural gas supply is an essential element of economic stability, public welfare and energy security. Households, healthcare facilities, educational institutions, district heating systems and industrial consumers rely on the availability of natural gas. A prolonged disruption may have significant economic and social consequences and may affect the functioning of essential services.

Regulation (EU) 2017/1938 concerning measures to safeguard the security of gas supply, as incorporated into and adapted for the Energy Community acquis on 30 November 2021, establishes a common framework for preventing, mitigating and managing gas supply disruptions. It requires Contracting Parties to assess risks affecting their gas systems, establish measures to reduce vulnerabilities and prepare emergency arrangements capable of protecting consumers and preserving the functioning of the gas market during crises.

The general transposition deadline was 31 December 2022. The first national risk assessments were due by 1 January 2024, followed by PAPs and EPs by 1 May 2024. Preparing, adopting and updating these instruments forms part of Contracting Parties' obligations under the Energy Community acquis.

Following the Regulation's incorporation, Russia's full-scale invasion of Ukraine in February 2022, reduced Russian gas supplies and the end of transit through Ukraine on 1 January 2025 reshaped Europe's gas security environment. These developments highlighted the need to plan for prolonged supply changes alongside short-term technical failures.

PAPs should explain how the selected measures address identified vulnerabilities, while EPs should establish how available responses will be activated and coordinated during a disruption. Both plans should be based on up-to-date information, clearly assigned responsibilities and a realistic assessment of available supply, infrastructure and demand-side capabilities.

Although the adapted Regulation does not reproduce the EU framework's formal regional risk-group architecture or solidarity provisions, national gas systems remain physically and commercially interconnected. A measure assumed to be available in one country may depend on infrastructure, gas, electricity or decisions in another. The absence of a formal regional planning architecture therefore does not remove the practical need for coordinated assumptions, information exchange and compatible emergency procedures.

These Policy Guidelines support competent authorities in developing effective PAPs and EPs, promoting consistency across the Energy Community while accommodating national circumstances. It introduces no additional templates or submission requirements.

1. Planning framework and responsibilities

1.1 Complementary roles of the plans and the planning cycle

The PAP and EP perform different but connected functions.

The PAP explains how risks identified in the national risk assessment will be prevented or mitigated. It demonstrates compliance with the applicable infrastructure and supply standards and sets out the measures, responsibilities and implementation arrangements needed to strengthen resilience before disruptions occur.

The EP explains how a deterioration in gas supply will be managed. It establishes crisis procedures, decision-making responsibilities, response measures, information flows and coordination arrangements. It should enable the responsible actors to move from recognising a problem to taking lawful and effective action.

The two plans should form part of a continuous planning cycle. The risk assessment identifies vulnerabilities, the PAP establishes preventive responses, the EP determines how remaining disruptions will be managed, and implementation, exercises and actual events reveal improvements needed in the assessment and both plans.

The planning cycle may be summarised as follows:

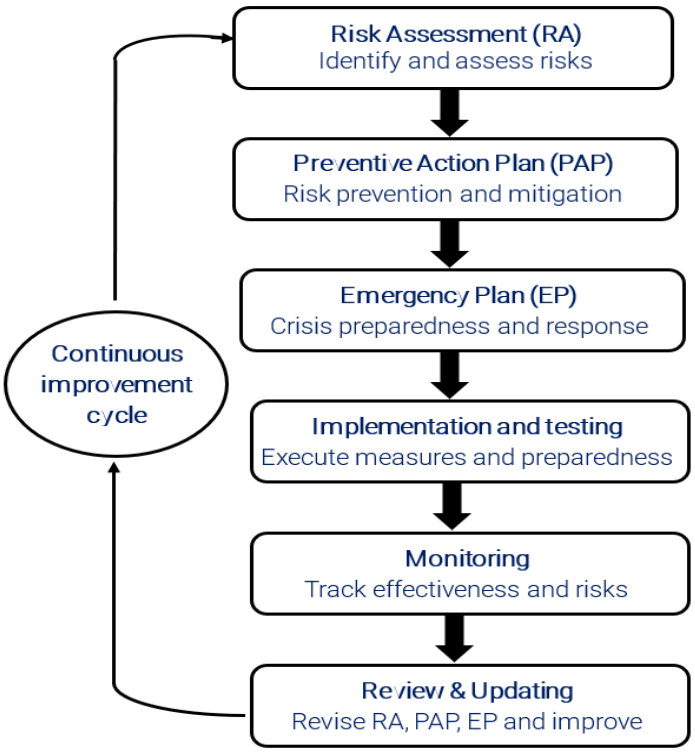


Figure 1. An integrated planning cycle for security of gas supply

A PAP should not merely reproduce the risk assessment, and an EP should not be a general catalogue of possible interventions. Each should provide the information necessary for its particular purpose. Both should use consistent assumptions concerning demand, protected customers, infrastructure availability, supply resources and the capabilities of the entities responsible for implementation.

Country-specific provisions must be assessed individually. An exception from the infrastructure standard does not automatically remove the obligation to ensure supplies to protected customers. Similarly, the absence of domestic underground storage does not, by itself, establish an exemption from the storage arrangements required under Article 6c.

The conditions and duration of any exception or derogation should be checked against the applicable legal text and relevant decisions. Plans should explain the basis on which it applies and identify changes that could bring it to an end.

The effectiveness of both plans depends on a sound risk assessment, credible measures and operationally workable implementation arrangements.

1.2 Using the national risk assessment

The national risk assessment is the analytical foundation for the PAP and EP. These Policy Guidelines do not establish a separate risk assessment methodology, it explains how assessment findings should inform the two plans.

Every gas system contains vulnerabilities. Some may be associated with dependence on a limited number of suppliers. Others may be related to ageing infrastructure, insufficient interconnections, exceptional weather, cyber incidents, electricity failure affecting gas infrastructure, exposure to external geopolitical developments or credible combinations of events. The purpose of the risk assessment is to identify these vulnerabilities and evaluate their potential impact on security of supply.

The outcome of the assessment should lead directly to planning decisions. Risks that can be reduced should be addressed through preventive measures. Risks that cannot be fully eliminated should be addressed through emergency response arrangements.

The PAP should summarise the principal risks and relevant conclusions, identify the version and date of the underlying assessment, and explain how the selected preventive measures address the vulnerabilities identified. The summary should cover the affected infrastructure and customers, expected supply shortfalls and relevant cross-sector or cross-border consequences.

The EP should use those conclusions to define the response capabilities and procedures needed for credible disruption scenarios.

Each significant risk should be linked to preventive measures, emergency arrangements or a combination of both. Where a risk remains insufficiently addressed, the plans should explain the limitation and its implications for preparedness.

Where the assessment is outdated or material information is missing, the competent authority should identify the limitation and arrange the necessary update. Unsupported assumptions should not be presented as demonstrated security of supply. Both plans should reflect important uncertainties and remain aligned with the assessment on which they are based.

1.3 Institutional responsibility

Under Article 3, the competent authority has a central role in establishing and overseeing the plans. Each Contracting Party must designate a competent authority and notify its identity, and any changes, to the Secretariat without delay. The designation must also be made public.

Where tasks are delegated, the PAP and EP must specify those tasks and the bodies responsible. Delegated tasks remain subject to the competent authority's supervision. Delegation of the declaration of crisis levels is restricted to the bodies permitted under Article 3(2). The plans should explain the legal basis and scope of delegation and the associated reporting arrangements.

The competent authority should establish a drafting process involving relevant public authorities, the national regulatory authority, transmission and distribution system operators, storage operators where relevant, suppliers and other gas undertakings. Electricity and district heating actors should participate where their activities affect gas security or depend on gas supply.

Consumer representatives and major gas users should also contribute, particularly to the assessment of demand response, curtailment, protected customer requirements and the consequences of interruption.

The drafting process should distinguish policy responsibilities, regulatory decisions, commercial activities and operational system control. Naming an organisation in a plan is not sufficient: the authority should confirm that the organisation has the legal powers, resources, data access and operational capability needed to perform its assigned role.

Responsibilities should also remain clear where several institutions participate in the same measure. The plans should identify who leads the action, who provides information, who authorises implementation and who verifies completion.

1.4 Evidence and operational usability

Measures contained in both plans must be clearly defined, transparent, proportionate, non-discriminatory and verifiable. They must not unduly distort competition or the effective functioning of the single gas market or endanger the security of gas supply of other Contracting Parties or EU Member States.

Plans should distinguish technical capacity from actual supply availability and operational readiness. An interconnector may exist without sufficient upstream supply being available. Storage capacity may be booked before the corresponding gas has been procured and injected into storage. Booked storage capacity alone therefore does not demonstrate that gas stocks are available. A fuel switching installation may be technically capable of operating on another fuel without adequate alternative fuel stocks, the necessary permits or trained personnel.

For significant measures, the plans should explain the expected contribution, the conditions under which it can be achieved and the principal limitations. Where precise quantification is not possible, the basis for any estimate and the remaining uncertainty should be stated. Resources already available should be distinguished from those that remain to be procured, contracted, financed or commissioned.

The public plans should remain readable and sufficiently detailed to explain the planning logic. Supporting calculations and sensitive operational information may be maintained separately where permitted by the Regulation and applicable confidentiality requirements. Such arrangements should not prevent authorised actors from accessing the information required to implement the plans.

The level of supporting detail should be proportionate to the significance of the measure and the characteristics of the national system. Operational usability does not require unnecessary documentation, it requires clear responsibilities, credible capabilities and procedures that can be followed under pressure.

2. Developing the Preventive Action Plan

The PAP sets out how the Contracting Party will prevent or mitigate the risks identified in the national risk assessment and demonstrate compliance with the applicable infrastructure and supply standards. It must follow Annex VI.

The plan should explain why measures have been selected, expected contribution, who is responsible for implementation and how progress will be monitored. Measures already available should be distinguished from those requiring further investment, agreement or implementation.

The objective is not to eliminate every conceivable risk. Rather, the PAP should establish a coherent and proportionate preventive strategy that reduces vulnerabilities and identifies the remaining risks to be addressed through emergency preparedness.

2.1 Describing the gas system and its vulnerabilities

The PAP must provide the system information required by Annex VI. The description should focus on the features that determine security of supply rather than presenting a general catalogue of the energy sector.

Demand information must include annual final consumption, a breakdown by customer type and peak demand. The description should clearly distinguish protected customers and explain the role of gas in electricity generation, cogeneration, district heating and industrial activity.

The infrastructure description should identify the main entry and exit points, transmission constraints, production facilities, storage facilities and relevant access to liquefied natural gas (LNG). It should explain actual flow patterns and the conditions under which alternative routes can be used. Domestic production and storage should be described in terms of both volumes and daily delivery capability.

Where storage contributes to security of supply, the PAP must describe its capacity relative to heating-season demand and its withdrawal capability at different filling levels. For cross-border storage and LNG access, the description should identify the transport routes and material constraints affecting delivery to the national system.

The PAP should also explain progress in diversification and significant changes in the breakdown of consumption. Where relevant, it should address renewable gas production and the effects of electrification, energy efficiency and changes in electricity generation on future gas demand. These forward-looking elements should be distinguished from the minimum information expressly required by the Regulation.

All principal data should have a clear reference period. Forecasts should be distinguishable from observed values, and the plans should use consistent units and conversion assumptions.

2.2 Demonstrating compliance with the infrastructure standard

Where Article 5(1) applies, the PAP must demonstrate that the remaining infrastructure can satisfy total daily gas demand in the calculated area following disruption of the single largest gas infrastructure, during a day of exceptionally high gas demand occurring with a statistical probability of once in 20 years. The assessment must take account of gas consumption trends, the long-term impact of energy efficiency measures and the utilisation rates of existing infrastructure.

The calculation must follow Annex II. The PAP must identify the single largest infrastructure, describe and justify the parameters used, explain the relevant methodologies and provide intermediate values sufficient to reproduce the result, including the capacities of the individual border entry points. The single largest infrastructure is the infrastructure with the highest technical capacity to supply the calculated area. Where several infrastructures are connected to a common upstream or downstream gas infrastructure and cannot be operated separately, they must be treated as one single infrastructure.

The PAP should explain the operational meaning of the result, drawing on the hydraulic simulation required for the national risk assessment and, where relevant, the N–1 calculations at storage filling levels of 30% and 100% of maximum working volume. A favourable N–1 result does not, by itself, demonstrate that gas can be procured or delivered through all relevant internal bottlenecks to each affected area.

Where compliance relies on market-based demand-side measures under Article 5(2), the PAP must demonstrate that those measures can compensate sufficiently and in a timely manner for the disruption, using the calculation specified in Annex II, point 4. It should identify the participating demand, the arrangements securing participation, achievable reduction, activation times and verification methods. Unconfirmed voluntary reductions should not be treated as secured capability, and the same reduction must not be counted twice.

The PAP must identify the interconnection points equipped with bidirectional capacity, their maximum reverse-flow capacities and the arrangements governing their use. It must also identify applicable exemptions, including their duration and grounds, in accordance with Article 5(4), Annex III and Annex VI.

Where an exception under Article 5(9) is relied upon, the PAP should identify its current legal basis, explain whether the conditions for its continued application remain satisfied and describe how supplies to protected customers will be secured in accordance with Article 6. Any relevant applicability provisions under Article 20 should also be taken into account.

Where the applicable N–1 requirement is not met, the PAP should clearly identify the shortfall and explain the measures, volumes and capacities needed to address it, together with implementation responsibilities and timescales. Planned measures should be distinguished from capabilities already available.

➢ PRACTICAL EXAMPLE
Distinguishing the N–1 calculation from wider disruption scenarios

The N–1 calculation asks a specific question: **if the single largest gas infrastructure becomes unavailable, can the remaining infrastructure meet total gas demand on an exceptionally high-demand day occurring with a statistical probability of once in 20 years?** It assesses technical infrastructure capacity, not whether sufficient gas has been purchased or whether supplies can be sustained throughout a prolonged disruption.

Consider a gas system supplied through several cross-border entry points. Depending on the country, domestic production, storage or LNG facilities may also contribute. Only the infrastructure and capacities relevant to the calculated area should be included. Where a category is absent, its contribution is zero. Gas obtained from storage outside the calculated area must not be counted again as domestic storage deliverability where its delivery is already represented through border entry capacity.

Reference N–1 calculation — loss of the single largest infrastructure

The authority identifies the single largest gas infrastructure, removes its contribution and assesses the remaining capacity against the once-in-20-years daily demand. In an import-dependent system, the largest infrastructure may be a cross-border entry point. In a system with production, storage or LNG, the largest infrastructure should be identified by its contribution to supplying the system, rather than automatically assuming that it is an import pipeline. Relevant common dependencies must also be considered in accordance with Annex II.

Required supporting analyses. The national risk assessment supplements the calculation with a hydraulic simulation of the largest-infrastructure disruption and, where relevant, calculations at storage filling levels of 30% and 100% of maximum working volume. These help explain whether network constraints or changing storage withdrawal capability affect the result.

Wider disruption scenarios. The risk assessment also examines relevant scenarios such as the loss of another entry point, disruption of a common supply route or a prolonged supply interruption. Each assessment should explain what changes from the reference calculation and why. Where demand-side measures are used to demonstrate compliance under Article 5(2), their contribution must be substantiated through the corresponding Annex II calculation.

For example, a country without domestic storage or production may have sufficient remaining entry capacity after losing its largest entry point but still face difficulties procuring or sustaining alternative deliveries during a prolonged disruption. A country with storage may pass the capacity test but face difficulties later as stocks decline and withdrawal capability falls. Where relevant, the wider assessment should also consider how internal network constraints may affect supplies to national consumers and neighbouring markets.

Implication for the PAP: An N–1 result of at least 100%, calculated in accordance with Annex II, demonstrates that the N–1 capacity requirement is met. It does not, by itself, establish compliance with all obligations under Article 5 or remove the need to address vulnerabilities identified through the risk assessment. The PAP should distinguish the prescribed calculation from supporting analyses and wider scenarios, explain the weaknesses identified and set out the measures addressing them.

Legal basis: Articles 5, 7(4), 9(1)(c) and (j); Annexes II and III; and Annex VI, section 3.2, of Regulation (EU) 2017/1938 as adapted for the Energy Community.

2.3 Demonstrating compliance with the supply standard

The PAP must state the national definition of protected customers and provide the information required by Article 6 and Annex VI. The definition must remain within Article 2(5).

Household customers connected to a gas distribution network are protected customers. Where the national definition also includes eligible small and medium-sized enterprises or essential social services, the plan must demonstrate compliance with the applicable combined consumption limit. Where district-heating installations are included, the definition must respect the conditions concerning the customers served and the inability to switch to fuels other than gas.

The PAP must identify the natural gas undertakings required to ensure supplies to protected customers under the following conditions:

- Extreme temperatures during a 7-day peak period occurring with a statistical probability of once in 20 years.
- Any period of 30 days of exceptionally high gas demand, occurring with a statistical probability of once in 20 years.
- A period of 30 days following disruption of the single largest gas infrastructure under average winter conditions.

For each case, the PAP must identify the necessary gas volumes and capacities. It should explain the demand assumptions, the contribution of the measures relied upon and how delivery to protected customers is secured.

The demonstration should consider both aggregate volumes and daily deliverability. It should account for relevant supply contracts, transport capacity, storage withdrawal constraints and the time needed to activate alternative arrangements. The same gas volumes or capacities should not be counted more than once across overlapping obligations.

The competent authority must not require the standard to be met solely through infrastructure located within national territory. Cross-border resources may contribute where their availability and delivery are credibly demonstrated.

The PAP must describe any increased supply standard or additional security-of-supply obligation and demonstrate compliance with Article 6(2). Obligations imposed on undertakings must be non-discriminatory and must not impose an undue burden.

Monitoring arrangements should enable the authority to detect potential shortfalls before the relevant risk period. Where applicable, the PAP must describe the monitoring and sanctions arrangements required by Annex VI.

2.4 Selecting preventive measures

The PAP must be based primarily on market-based measures. Where non-market-based measures are included, they must comply with the applicable requirements of the adapted Regulation.

Measures should be selected because they address identified risks, not simply because they are commonly included in security of supply plans. Depending on national circumstances, appropriate measures may include supply diversification, commercial storage arrangements, contractual flexibility, demand response, infrastructure improvements, maintenance, fuel switching, energy efficiency and protection of critical facilities.

Not all measures can be implemented simultaneously. Authorities should prioritise measures according to effectiveness, urgency, feasibility, implementation timeframe and cost-effectiveness. A smaller number of well-targeted and implementable measures is generally more effective than an extensive list of ambitions with limited prospects for delivery.

The PAP should explain how the selected measures work together. Several measures may address a single risk, while one measure may improve resilience against several scenarios. Their expected contributions should be assessed consistently, avoiding double counting where measures depend on the same gas volumes, infrastructure capacity or demand-reduction potential.

Particular care is needed when describing diversification. A new route supplied by the same upstream source may improve route security without materially reducing source dependence.

Similarly, additional entry capacity may have limited security value if gas cannot be purchased or transported to the customers concerned.

Gas storage should be considered within this broader preventive strategy, taking account of the risks identified and the characteristics of the national gas system. The PAP should explain the contribution that storage can realistically make to security of supply, whether through domestic facilities or access to storage in another country.

Where storage obligations apply, considering the relevant obligations for the Contracting Parties with or without underground storage facilities, the PAP should describe the arrangements for meeting the applicable filling requirements and intermediate trajectories, monitoring implementation and addressing potential shortfalls. This description should reflect the relevant provisions of Articles 6a–6d, as amended and applicable to the Contracting Party concerned, including any derogations.

The PAP should distinguish between access to storage capacity, the availability of gas held in storage and the ability to deliver that gas when needed. Relevant considerations include withdrawal capability, transport capacity and potential constraints during a regional disruption. Meeting a storage filling requirement does not, by itself, demonstrate compliance with the protected-customer supply standard or establish sufficient daily deliverability. Arrangements for using stored gas during an emergency should be addressed consistently in the EP.

For all significant preventive measures, the PAP should identify the responsible institutions, implementation timelines, expected outcomes and monitoring arrangements.

➢ PRACTICAL EXAMPLE
Market-based and non-market-based measures

The same action—reducing gas consumption or switching to another fuel—can be market-based or non-market-based. The distinction lies in how it is activated, not simply in its physical effect.

- *Market-based measures:* commercially agreed demand reduction and voluntary fuel switching. A gas supplier facing a shortage may offer an industrial customer payment or discount to reduce consumption for an agreed period. If the customer accepts, the reduction is obtained through a voluntary commercial arrangement. Activation of an interruptible supply contract in accordance with its agreed terms is also market-based.

Similarly, a dual-fuel industrial facility or heat producer may voluntarily switch from gas to an alternative fuel in response to high gas prices. This may be commercially attractive during a regional gas crisis, provided the facility has suitable equipment, sufficient alternative-fuel supplies and the necessary permits. The decision is market-based because the operator responds to commercial conditions rather than a compulsory instruction.

- *Non-market-based measures:* compulsory demand reduction and enforced fuel switching.

Where market-based responses are insufficient, the competent authority may, subject to the applicable legal conditions, order specified customers to reduce gas consumption or require technically capable facilities to switch to an alternative fuel. These are non-market-based measures because they are imposed through public-authority intervention rather than undertaken through commercial decisions or agreed contractual arrangements. Payment of compensation does not, by itself, make a compulsory measure market-based.

Annex VIII expressly identifies enforced fuel switching as a non-market-based measure. It also includes enforced utilisation of interruptible contracts where these have not been fully utilised as part of market-based measures.

The PAP should describe the realistically available commercial demand-reduction and voluntary fuel-switching capabilities, including activation times and relevant technical, fuel-supply and environmental constraints. The EP should separately describe the legal basis, responsible authority and procedures for compulsory interventions. Capacity already expected to respond voluntarily should not be counted again as additional capacity available through an emergency order.

Legal basis: Article 9, Article 10(1)(h)–(i), Article 11(1), and Annex VIII of Regulation (EU) 2017/1938 as adapted for the Energy Community.

Note: This example concerns operational responses to a shortage. Preventive non-market-based measures are also possible under Article 9, subject to its applicable requirements.

2.5 Addressing preventive non-market measures

The PAP may include preventive non-market-based measures where permitted by the applicable framework. Such measures require particular attention to necessity, proportionality and their effects on the market.

The distinction between preparing a capability and activating compulsory emergency intervention must remain clear. Establishing an obligation or readiness arrangement in advance does not mean that its emergency activation is permitted at any time. The PAP should explain the preventive arrangement, while the EP should specify any crisis-related activation conditions and procedures.

For each preventive non-market-based measure, the PAP should explain why market-based alternatives are insufficient, what risk is addressed and why the proposed design is no more restrictive than necessary. The applicable assessment and notification requirements under Article 9 must be followed.

The supporting explanation should address the relevant economic, competition, consumer, environmental and cross-border effects, with a level of detail appropriate to the measure and the applicable legal requirements. Where a particular effect is not material, the plan should briefly explain that conclusion rather than imply that an extensive separate study is always necessary.

Measures should be subject to review. Where the underlying risk or market conditions change, the authority should reconsider whether the intervention remains justified and whether it should be adjusted or discontinued.

2.6 Assessing effectiveness and impacts

The PAP should explain how the selected measures contribute to addressing the identified risks. The explanation should be proportionate to the nature and significance of the measures and draw on available information.

Where feasible, the PAP should indicate the expected improvement in security of supply, such as a reduction in a potential supply shortfall or an increase in the period for which demand can be met. A full reassessment of every scenario is not necessary solely for this purpose, provided the expected contribution and principal limitations of the measures are adequately explained.

The PAP must address the impacts required by Article 9. For general preventive measures, the PAP should briefly describe the main expected economic, market, customer, environmental and/or cross-border effects, where relevant. More detailed analysis may be appropriate for significant investments or obligations, or where expressly required by the applicable framework.

Where information is limited, the PAP should acknowledge the main uncertainties rather than provide unsupported estimates. It should also avoid double-counting benefits where several measures depend on the same supply, infrastructure capacity or customer response.

Remaining risks should be stated transparently and reflected in emergency planning. The PAP should distinguish risks that are accepted on a reasoned basis from gaps that require further corrective action.

➢ PRACTICAL EXAMPLE
A short and targeted assessment of impacts

Assessing a measure means explaining what it achieves, who bears its costs and what other effects it may have—not simply describing how it works. A concise assessment can draw on existing operational information, contractual arrangements and stakeholder consultation. Its detail should reflect the scale and significance of the measure.

Illustrative measure: voluntary arrangements with technically capable industrial customers to switch temporarily from gas to an alternative fuel during a supply shortage.

The PAP could present the assessment as follows:

Effectiveness and limitations. The measure reduces gas demand during a shortage, helping to maintain supplies to other customers. Its expected contribution is based on participating facilities' verified switching capability, activation time and available alternative-fuel stocks. Only demand reduction that can be delivered within the relevant disruption scenario is counted. Facilities without suitable equipment, fuel supplies or permits are excluded.

Economic impact and efficiency. The main costs are maintaining switching equipment and alternative-fuel stocks, any additional fuel expenditure and, where applicable, contractual payments to participating customers. These costs should be considered against the expected benefit of avoiding gas-supply interruptions and the costs of other feasible responses, such as additional gas procurement or voluntary production reductions. Existing dual-fuel capability may offer a practical option, but it should not be assumed to be the least-cost solution without checking the relevant costs and availability.

Effects on customers and markets. Participating customers may be able to continue operating rather than shut down, but switching fuels may increase their operating costs or reduce production output. Other customers may benefit from reduced pressure on available gas supplies. Participation should be offered on transparent terms to technically eligible customers. Where contractual incentives are used, the assessment should identify how they are funded and whether their costs are passed on to other customers.

Environmental and cross-border effects. Switching to a more polluting fuel may temporarily increase emissions and local air pollution. The assessment should identify the fuel concerned, applicable permit conditions and any limits on operating duration. It should also consider whether the alternative fuel remains available during a regional crisis. Reduced gas demand eases pressure on the national gas balance and may also benefit neighbouring markets by reducing competition for available gas supplies. Any expected cross-border benefit should be explained in light of the relevant interconnections and supply arrangements.

The measure is retained where its verified contribution and expected benefits justify its costs and adverse effects. Participation arrangements should be reviewed before winter, and the contribution included in the PAP adjusted if equipment readiness, fuel availability or permit conditions change.

Replace statements such as "the measure has no significant negative impact" with a brief explanation of the expected effects and the evidence supporting that conclusion. Where an effect is uncertain or considered negligible, explain why.

Legal basis: Article 8(1), Article 9(1)(f)–(h) and Annex VI, Sections 4 and 5 of Regulation (EU) 2017/1938 as adapted for the Energy Community. This concise example does not replace any specific impact assessment requirements applicable to non-market-based measures under Article 9 (4)–(9).

2.7 Other obligations, infrastructure projects and implementation

The PAP must describe other obligations affecting security of supply, including those relating to safe system operation and relevant public service obligations. It must explain who is subject to them and how and when they apply.

Future infrastructure projects must be presented separately from resources already available. Their expected contribution should be linked to identified vulnerabilities and supported by realistic information on capacity, timing and dependencies. Planned infrastructure should not be counted as an existing response capability before commissioning and operational readiness.

The PAP should explain the status of significant projects, including permitting, financing, investment decisions and necessary works in neighbouring systems. Where completion depends on an external decision or another project, that dependency should be explicit.

Implementation should be supported by clear responsibilities and milestones. The authority should monitor whether measures have been delivered and whether they provide the contribution anticipated. Monitoring should identify implementation delays, changes in assumptions and newly emerging vulnerabilities.

A measure should not be treated as complete merely because an administrative decision has been adopted. Where operational readiness depends on contracts, equipment, staffing, procedures or testing, the relevant conditions should also be verified.

Implementation monitoring should support corrective action and future updates of the PAP.

2.8 Cooperation with neighbouring countries

The PAP must describe mechanisms for cooperation with other Contracting Parties, including those used to prepare and implement preventive and emergency measures.

Cooperation should focus on practical dependencies: access to supply, transport and storage; compatible reverse-flow arrangements; coordinated maintenance; and the effects of national measures on neighbouring systems.

The competent authority should seek early discussion of assumptions and relevant draft provisions with neighbouring authorities, including EU Member States where appropriate. Such exchanges are recommended practice and should not be presented as the EU regional planning procedure excluded from the adaptation.

Attention should be given to resources that several countries may expect to use simultaneously. Access to the same import route, storage facility or source of emergency supply should not be assumed to remain unconstrained during a wider disruption.

The plan should distinguish binding arrangements from informal understandings and prospective cooperation. Where assistance depends on further agreement, that limitation should be explicit. Cooperation arrangements should identify their legal, contractual, technical or administrative basis and the entities responsible for implementation.

3. Developing the Emergency Plan

The EP constitutes the operational component of the security of supply framework. It describes how authorities, system operators and market participants will respond to a deterioration in supply and manage disruptions that preventive measures cannot fully avoid.

The EP must follow Annex VII and describe the measures, actions and procedures for each crisis level. It should be built around credible disruption scenarios and explain how decisions will be taken, communicated and implemented under crisis conditions.

Market-based responses remain important throughout a crisis. The EP should identify and prepare any legally available non-market interventions in advance, while making clear that their activation remains subject to the conditions established by the adapted Regulation. It should also provide for ending temporary interventions, safely restoring normal operation and incorporating lessons learned into future planning.

3.1 Defining crisis levels and declaration procedures

Article 11 establishes three crisis levels.

Early warning applies where concrete, serious and reliable information indicates that an event may significantly deteriorate supply and is likely to trigger alert or emergency. At this stage, authorities should intensify monitoring, increase information exchange and review contingency arrangements.

Alert applies where disruption or exceptionally high demand significantly deteriorates supply, but the market can still manage the situation without non-market intervention. During this phase, authorities should coordinate closely with market participants and monitor the effectiveness of available commercial responses.

Emergency applies where all relevant market-based measures have been implemented but supply remains insufficient and additional non-market measures are necessary, particularly to safeguard protected-customer supply.

The EP must identify the authority empowered to declare and terminate each level. It should describe the evidence used, the decision procedure and the required notifications.

Operational indicators may include forecast supply deficits, infrastructure losses, pressure trends, storage endurance and the exhaustion of market responses. These indicators support the legal assessment; they do not replace it.

The plan should not require sequential declaration of all levels if the circumstances already justify a higher level.

The relationship with general national emergency legislation must be explicit. A civil-protection or national emergency procedure should not create ambiguity about gas sector declarations, powers or reporting obligations.

➢ PRACTICAL EXAMPLE

When should the competent authority declare a crisis level?

The EP must explicitly identify the body responsible for declaring each crisis level and the procedures to follow, as required by Annex VII, point 1(a). This responsibility rests with the competent authority under Article 11(2), unless delegated in accordance with Article 3(2). Any such delegation must be specified in the EP and remains subject to the competent authority's supervision.

The EP should also set out the indicators informing the declaration, such as the scale of a supply shortfall, network pressure levels or technical failures, and the measures and activation procedures applicable at each level. These indicators should support the assessment against the crisis-level definitions in Article 11(1), rather than serve as automatic triggers in isolation.

The key questions are: Is a significant deterioration anticipated or already occurring? Can market-based measures still meet demand? An infrastructure failure does not automatically mean an Emergency, and the authority should not wait until protected customers lose supply before acting.

Illustrative scenario: a major import route is threatened by a technical failure during winter.

- Early Warning — a credible threat requires preparation. The upstream operator provides concrete, serious and reliable information that the import route may become unavailable. Deliveries currently continue, but the transmission system operator (TSO) confirms that the anticipated interruption could significantly worsen the national supply situation and lead to an Alert or Emergency.

The competent authority declares Early Warning on the basis of that verified information and its likely consequences. It intensifies monitoring and asks suppliers and operators to confirm alternative supplies, transport capacity, storage deliverability and available voluntary demand reductions. An unverified report or a price increase alone would not establish that these conditions are met.

- Alert — the disruption is occurring, but the market can manage it. The import route becomes unavailable and the supply situation deteriorates significantly. Suppliers obtain replacement gas through another route, increase commercial storage withdrawals and activate agreed interruptible contracts. The TSO confirms that these responses can maintain supplies and safe system operation without compulsory intervention.

The competent authority declares Alert. The decisive consideration is not that an important route has failed, but that a significant disruption is occurring and market-based responses remain sufficient. The authority monitors whether these responses can be sustained for the expected duration of the interruption.

- Emergency — market-based responses no longer cover demand. The interruption continues and cold weather raises demand. All relevant market-based measures have been implemented, but the updated gas balance shows that available supplies cannot meet the remaining demand. The TSO confirms that additional compulsory demand reduction is necessary to maintain safe operation and safeguard supplies, particularly to protected customers.

The competent authority declares Emergency and activates the necessary, proportionate non-market-based measures under the EP, such as compulsory reductions for designated non-protected customers. It should not wait for pressure to fall to unsafe levels or for household supplies to be interrupted: the decision should use the verified operational outlook and allow for the time needed to implement the measures.

How does the authority know? The EP should establish a clear route for the TSO and suppliers to provide a short operational assessment covering:

- The event: its reliability, expected duration and effect on deliveries.
- The gas balance: forecast demand and physically deliverable supplies, including relevant network constraints.
- The market response: measures implemented, their actual contribution and whether further responses can arrive in time.
- The remaining risk: any uncovered demand, threats to safe operation and the expected ability to maintain protected-customer supplies.

Country-specific indicators such as reduced entry flows, a forecast supply deficit, declining pressure margins or a line-pack falling below operational minimum — can support this assessment. An increase in gas prices, whether locally or across the region, does not in itself justify declaring a crisis level. Higher prices may reflect a normal market response to tighter supply–demand conditions and warrant closer monitoring, but they do not automatically demonstrate a threat to physical supply or an inability of the market to meet demand. The competent authority should therefore examine closely the circumstances underlying the price increase, considering price developments alongside information on supply availability, infrastructure conditions, demand and the market's capacity to respond. It should substantiate its conclusion as to whether the legal conditions for declaring an Early Warning, Alert or Emergency under Article 11(1) are met. Whenever a crisis level is declared, the competent

authority must immediately notify the Energy Community Secretariat and the competent authorities of directly connected Contracting Parties.

Indicators inform the decision; they do not replace the legal conditions for each level. The authority should record why those conditions are met, the actions required and when the situation will next be reviewed. The levels need not be declared sequentially if a sudden event already meets the conditions for a higher level.

Legal basis: Articles 10(1)(a), (d), (f), (h) and (i); 11(1)–(2); 14(1) and (4); and Annex VII, Section 1, of Regulation (EU) 2017/1938 as adapted for the Energy Community.

3.2 Organising crisis management and information flows

The EP must identify the crisis manager or team and the responsibilities of the relevant actors.

The institutional description should distinguish statutory decisions, commercial decisions and operational control. The competent authority may direct the overall response within its powers, while system operators remain responsible for safe operation and undertakings retain their assigned commercial obligations.

The plan should explain how information is consolidated, how urgent decisions are approved and how instructions reach implementing bodies. Deputies and out-of-hours arrangements should be established.

A controlled contact directory should include primary and backup contacts, secure communication channels and escalation arrangements. This directory should be tested and updated without requiring a full republication of the plan.

Information flows should support a common operational picture. The EP should identify who collects information, who checks it, who assesses its implications and who is authorised to issue instructions or public messages.

The daily information requirements under Article 14 are addressed in Section 3.7. More frequent operational exchanges may be needed where conditions change rapidly, subject to the applicable legal powers. The plan should provide arrangements for resolving inconsistent data and maintaining essential information flows if normal systems are unavailable.

3.3 Responding through market-based measures

At early warning level, the emphasis should be on verification, intensified monitoring and preparation. The EP should explain how the authority confirms the information received, assesses possible consequences and checks the readiness of the actors and measures potentially required.

Preparatory actions may include reviewing supply and capacity availability, confirming storage access, checking demand-response arrangements and notifying relevant operational teams. These actions should not be confused with activating emergency-only non-market interventions.

At alert level, the EP must identify the contribution of market-based measures. These may include additional commercial procurement, use of contractual flexibility, commercially initiated storage withdrawals, voluntary demand response and activation of interruptible arrangements in accordance with their contractual terms.

Linepack may provide short-term operational flexibility but should not be treated as a sustained source of supply. Its use must remain within safe operating limits.

For each significant measure, the EP should explain the actors involved, the procedure, the expected contribution, activation time, duration and information flows. The authority should be able to determine whether a measure is available, being implemented, exhausted or ineffective under the circumstances.

Commercial and industrial actors must have sufficient opportunity to respond in accordance with the applicable framework. The EP should therefore describe how the market response is monitored and how any remaining deficit is assessed before escalation.

3.4 Measures at emergency level

The EP must establish predefined actions to make gas available during an emergency, including relevant commercial agreements and compensation mechanisms where appropriate. Market-based measures may continue to contribute at emergency level and should not be treated as automatically displaced by public intervention.

Non-market-based measures must be identified, their necessity and effects assessed, and their implementation procedures defined. Such measures may be used only when market-based mechanisms alone can no longer ensure supplies, particularly to protected customers. Annex VIII provides a list of non-market-based security of gas supply measures.

For each significant emergency intervention, the EP should establish who takes the decision, the legal basis, the conditions for activation, the entities required to act, the expected contribution and the principal effects. It should also explain how implementation will be monitored, reviewed and ended.

Where stored gas is part of the response, the EP should distinguish commercial stocks, strategic storage and balancing stock. It should explain ownership and control, release conditions, authorisation requirements, withdrawal capability and transport arrangements. An emergency

declaration does not automatically transfer control of privately held gas or remove contractual and regulatory constraints.

The plan should explain any applicable compensation arrangements and distinguish arrangements already established from those requiring further legal or contractual action. Unresolved financing or compensation issues should be identified before a crisis.

A declaration of emergency does not waive the requirements of necessity, proportionality, non-discrimination and cross-border protection. Any duly justified exceptional departure from the EP must follow the notification and justification requirements of Article 11(4).

3.5 Curtailment and prevention of undue consumption

The EP must describe the technical and legal arrangements to prevent undue consumption by non-protected customers of gas intended for protected customers during an emergency.

Curtailment arrangements should be sufficiently detailed to be implemented safely. They should identify the responsible bodies, the basis for prioritisation, the method of notifying affected customers, the means of verifying compliance and the arrangements for managing technical constraints.

Voluntary contractual interruption should be clearly distinguished from compulsory demand reduction or firm-load shedding. The plan should avoid counting the same demand reduction under more than one measure.

Curtailment schedules should take account of safety, public health, essential services, network configuration and relevant energy-system interdependencies. Where prioritisation among non-protected customers is used, its criteria should be transparent and consistent with applicable law.

The EP should address the practical limits of selective disconnection, particularly on distribution networks supplying mixed customer categories. It should explain how customers are instructed to reduce or cease consumption without creating unsafe situations, consistent with the requirements of Article 10.

The plan should distinguish demand that can be interrupted promptly from processes requiring minimum notice, controlled shutdown or a minimum level of gas supply to prevent damage or unsafe conditions.

Restoration should be considered when curtailment is designed. Restarting industry or reconnecting distribution customers may require inspection, staffing and phased load recovery. These requirements can materially affect the duration and consequences of interruption.

3.6 Coordinating with electricity and district heating

The EP must address the potential effects of a gas disruption on district heating and electricity generation where relevant or explain why specific measures are not appropriate.

For district heating, the plan should identify the installations affected, the customers served, the availability of alternative fuels and the constraints on switching. A nominal dual-fuel capability should not be treated as available unless the necessary stocks, equipment, permissions and operating arrangements are in place.

For electricity, the EP should explain how gas shortages affect generation adequacy, balancing and the operation of critical infrastructure. Coordination arrangements between gas and electricity transmission system operators must be clear at each crisis level.

Gas supply and electricity supply can be mutually dependent. Electricity shortages may affect gas production, compression, storage or control systems, while reduced gas deliveries may constrain electricity generation. The response should therefore be assessed jointly rather than through separate sector assumptions.

Where a Contracting Party envisages using Article 11(7) to prioritise certain critical gas-fired power plants over certain categories of protected customers, it must meet the conditions of that provision. The relevant plants and possible gas volumes must be clearly identified through cooperation between the gas and electricity transmission system operators, and the measure must be based on the risk assessment.

The EP should explain the request, assessment and decision procedure for this exceptional prioritisation. It should not treat all gas-fired generation as automatically entitled to priority.

3.7 Notifications and reporting

Declaration of any crisis level triggers the applicable immediate notification obligations under Article 11. When a crisis level is declared, the competent authority must immediately inform the Secretariat and the competent authorities of directly connected Contracting Parties, providing the necessary information, particularly on intended action.

Article 14(1) requires the undertakings concerned, whenever any crisis level has been declared, to provide daily information on demand and supply forecasts for the following three days, relevant gas flows and the expected period for which supplies to protected customers can be ensured.

The EP should specify submission times, reporting channels, responsibility for checking data and arrangements for resolving inconsistencies. It should also identify who prepares and transmits the information required by the Secretariat under the applicable provisions.

A common situation report should combine operational data, the current balance, available measures, decisions taken and the short-term outlook. Data should be time-stamped, validated and accompanied by the assessed uncertainty.

Public communication should distinguish voluntary requests, binding restrictions and safety instructions. Messages should identify the authoritative information source and avoid disclosure of commercially or security-sensitive details.

The plan should provide backup arrangements for failure of normal communications and ensure that urgent messages can reach the actors and customers required to take action.

3.8 Cross-border cooperation

Emergency measures must respect the applicable safeguards against undue restrictions on cross-border gas flows and serious harm to another Contracting Party's supply security. Cross-border access to infrastructure must be maintained as far as technically and safely possible, in accordance with the applicable requirements.

The EP must describe cooperation and information-exchange arrangements at each crisis level. It should identify the operational contacts, the information to be exchanged and the arrangements for coordinating measures that may affect neighbouring systems.

The EP should explain how the transmission system operator will apply the priority rule in Article 11(5) when an emergency is declared in a neighbouring Contracting Party. The associated compensation process must not delay implementation of that rule.

Where assistance is expected from an EU Member State or another neighbouring country, the plan should identify the actual arrangements supporting it, including relevant commercial, technical and administrative conditions. It should not describe prospective assistance as a guaranteed entitlement under EU solidarity rules.

The plan should distinguish assistance that can be activated under existing arrangements from support requiring further agreement. Relevant constraints, including competing demand during a regional disruption, should be stated.

The plan should also identify responsibility for responding promptly to the Secretariat's examination of an emergency declaration and any request to modify measures or end an unjustified emergency.

3.9 Ending the crisis and restoring operation

The EP should define the evidence required to de-escalate or terminate a crisis level and end temporary interventions. It should identify the responsible decision-maker, the information supporting the decision and the applicable notification arrangements.

Restoration should be managed as a distinct phase. It may include reconnecting customers, controlling industrial restart, returning to normal balancing arrangements, replenishing stocks and settling emergency transactions.

The sequence of restoration should take account of system safety, available supply, network constraints and the ability of customers to resume consumption. Ending a crisis declaration should not be treated as evidence that all operational consequences have been resolved.

Following an emergency, the competent authority must prepare the assessment required by Article 14(3) and provide it to the Energy Community Secretariat as soon as possible and no later than six weeks after the emergency is lifted.

The review should identify which measures worked, which failed, what effects occurred and what changes are required. The assessment must be made available to the Security of Supply Coordination Group and reflected in updates of the PAP and EP.

4. Consultation, adoption, testing and updating

4.1 Stakeholder consultation

Consultation is part of plan development, not a final procedural step.

The competent authority must consult the relevant gas undertakings, organisations representing the interests of household and industrial gas customers, including electricity producers, and the relevant national regulatory authority when establishing the PAP and EP. Consultation should also involve other actors whose responsibilities or operations are directly affected by the plans, such as district-heating operators and authorities responsible for implementing emergency measures.

Consultation should be a substantive part of preparing the plans, rather than a final procedural step. It should help verify the underlying assumptions, establish whether proposed measures can be implemented and identify consequences that may not be apparent to the drafting authority. Stakeholders should receive sufficient information and a meaningful opportunity to comment while changes are still possible.

The consultation should address both the planning assumptions and the practical arrangements. For the PAP, this includes the availability and deliverability of preventive measures, implementation responsibilities and relevant impacts. For the EP, it includes decision-making arrangements, information flows, the activation of response measures and the practical consequences of curtailment and restoration.

The PAP must describe the consultation mechanism and results in accordance with Annex VI. The authority should maintain a concise record covering both plans, identifying the principal comments received, the changes made and the reasons for not accepting substantive proposals. Commercially confidential and security-sensitive information should be handled through appropriate arrangements without unnecessarily restricting meaningful participation.

Consultation should be completed in time for its results to inform the plans before adoption. The subsequent arrangements for adoption, publication and notification, including submission of the supporting national risk assessment, are explained in Section 4.4.

➢ PRACTICAL EXAMPLE
When and how to consult stakeholders

Start consultation while the plans can still change—not when they are ready for signature. For a routine comprehensive update of the PAP and EP, stakeholder engagement could begin around four months before the intended adoption date. The sequence below is illustrative: the Regulation does not prescribe a minimum consultation period, and applicable national procedural requirements must be respected. The stages may overlap, particularly where drafting proceeds alongside the collection and validation of updated information.

Around four months before adoption — confirm assumptions and responsibilities.

The competent authority contacts the relevant stakeholders, explains the scope of the update and requests targeted information. This may include revised demand forecasts, infrastructure availability, supply arrangements, demand-reduction capabilities and operational constraints. Stakeholders are also asked to verify their proposed responsibilities.

For example, a district-heating operator may confirm that fuel switching is technically possible but explain that alternative fuel stocks would support only a limited period of operation. The PAP should reflect that limitation when assessing the measure's preventive contribution, while the EP should identify the conditions and time needed to activate it.

Around two to three months before adoption — consult on full draft plans.

The authority circulates the draft PAP and EP together, or makes them available through the applicable consultation procedure, allowing stakeholders to assess how the proposed arrangements fit together. A response period of approximately four weeks may be appropriate for a routine update, depending on the complexity of the changes and national procedural requirements. Sensitive operational details may be shared separately with the relevant actors.

The request for comments should highlight the issues on which feedback is particularly needed. These may include whether a measure is deliverable within the stated time, whether an assigned responsibility is supported by the necessary powers and resources, and whether proposed restrictions create safety or operational risks.

For example, an industrial customer may explain that an immediate interruption would damage equipment, whereas a controlled reduction over several hours would be feasible. The authority should assess this information and, where justified, adjust the EP's curtailment arrangements without assuming that the customer is exempt from restrictions.

Around one month before adoption — resolve substantive comments and check consistency.

The authority reviews the responses and holds targeted discussions where necessary. Attention should be given to disagreements affecting the availability of a measure, the allocation of responsibilities or the protection of customers. Changes should be reflected consistently across the PAP and EP and, where relevant, in the underlying risk assessment.

For example, if consultation establishes that a proposed demand-reduction measure cannot deliver the volume initially assumed, the PAP should revise its expected contribution. The EP should use the same revised assumption when describing the available crisis response.

Before adoption — close the feedback loop.

The authority prepares a concise account of who was consulted, when and how consultation took place, the principal issues raised, and the resulting changes or reasons for not accepting a proposal. This record should support the consultation description required in the PAP and explain how consultation informed both plans. Consultation does not require unanimous agreement, but unresolved issues affecting the legality or deliverability of a measure should be transparently addressed.

Legal basis: Article 8(2), Article 8(11) and Annex VI, Section 9, of Regulation (EU) 2017/1938 as adapted for the Energy Community.

4.2 Improving cross-border consistency

The adapted Regulation does not establish the full EU regional planning architecture. Nevertheless, competent authorities should exchange relevant draft findings and procedures with neighbouring competent authorities and transmission system operators, subject to confidentiality.

The objective is to identify incompatible assumptions, such as simultaneous reliance on the same limited import capacity or storage resource. Exchanges should also help confirm operational contacts, notification arrangements and the potential effects of national measures on neighbouring systems.

Any mandatory cooperation or notification requirement must be distinguished from recommended broader coordination. Voluntary cooperation strengthens plans but does not replace national obligations.

The Security of Supply Coordination Group of the Energy Community, through its Gas Subgroup, provides a forum for discussing common vulnerabilities, implementation experience and emergency preparedness.

4.3 Final review before adoption

The PAP and EP must be developed in accordance with Annexes VI and VII, respectively, and meet the applicable requirements of the Energy Community adapted Regulation. Before adoption, the competent authority should carry out a final check of both plans against those requirements.

The PAP should demonstrate a clear connection between identified risks, compliance with standards and the selected preventive measures. The EP should demonstrate that available

measures can be activated through defined powers, procedures and information flows, with credible estimates of their contribution.

The authority should confirm that the two plans use consistent data, customer definitions, infrastructure assumptions and descriptions of available resources. Any exception or derogation relied upon should have a clear and current legal basis.

The authority should also confirm that consultation has been documented, cross-border consequences considered, sensitive information appropriately protected and the actors responsible for implementation able to perform their assigned tasks.

This final review may be organised using the authority's existing administrative tools. No additional submission template is prescribed by these Guidelines.

4.4 Adoption, publication and notification

Following stakeholder consultation, the PAP and EP must be established by the competent authority in accordance with the applicable national arrangements and Article 8(2) of the adapted Regulation. The established plans must be made public and notified electronically to the Energy Community Secretariat pursuant to Article 8(7) and Article 18. As a practical arrangement, publication and notification should be coordinated to take place promptly following adoption.

The original notification deadline was 1 May 2024. Where a required plan remains outstanding, its preparation and notification should be treated as an overdue obligation, not deferred to the next regular update.

Publication must preserve the confidentiality of commercially sensitive information. Where critical information may be excluded under the Regulation, the public version should still explain the measures and planning conclusions sufficiently for scrutiny.

The national risk assessment, PAP and EP form a connected set of planning documents, but their submission requirements are distinct. The competent authority must submit the national risk assessment and its updates to the Secretariat in accordance with Article 7, while the PAP and EP are subject to the establishment, publication and notification requirements of Article 8. The documents do not necessarily have to be submitted simultaneously, but the authority should clearly identify which risk assessment underpins the notified plans.

When submitting an updated risk assessment, the authority should identify its date and version, summarise the principal changes and explain whether these require corresponding amendments to the PAP or EP. Where amendments are needed but have not yet been completed, the accompanying communication should explain how the material implications will be addressed.

An updated risk assessment should not be held back solely because amendments to the plans are still being prepared.

When notifying the PAP and EP, the authority should identify their adoption dates and versions, together with the supporting risk assessment. Any material differences in data or assumptions should be briefly explained. Clear version control should also show the relationship between the public plans and any controlled supporting material, so that operational actors can identify the current applicable documents.

The competent authority may seek clarification from the Secretariat during preparation, particularly where questions arise concerning the adapted Regulation or cross-border consistency. Such exchanges do not replace formal submission or notification and should not be described as prior approval of the documents.

Following notification, the Secretariat assesses the plans under Article 8. Where it recommends revision, the competent authority must follow the applicable response procedure, including the requirement to notify amended plans or explain disagreement within three months of the Secretariat's opinion.

4.5 Testing the Emergency Plan

The measures, actions and procedures in the EP must be tested at least once between its four-year updates.

Article 10(3) requires real-time simulation of high- and medium-impact scenarios and responses in accordance with the EP. The exercise should test whether the relevant actors can perform their roles through realistic procedures and within the time available during a disruption.

The scope of testing should cover the response chain relevant to the selected scenario, including detection, declaration, notification, decision-making, measure activation, customer instructions, cross-border coordination and restoration.

Table-Top exercises are useful for examining decisions and responsibilities. Contact tests and operational walkthroughs also support readiness. The exercise format should be assessed against the requirement for real-time response simulation rather than treated as sufficient solely because it is described as a test.

Scenarios should be drawn from the national risk assessment and expose material dependencies, such as delayed information, constrained storage withdrawal, loss of an entry point or simultaneous gas and electricity stress. Neighbouring authorities and operators should be involved where cross-border coordination is central to the response.

The EP must include a calendar for real-time simulations of emergency situations and identify the actors, procedures and specific high- and medium-impact scenarios covered by those simulations. Updated EPs must briefly describe the tests carried out since the previous plan, their main results and any measures adopted as a result.

The competent authority must present the test results to the Security of Supply Coordination Group. Identified shortcomings should lead to assigned corrective actions and, where necessary, amendments to either plan. Where testing does not identify a need for corrective measures, the results should nevertheless be documented.

➢ PRACTICAL EXAMPLE
Testing the Emergency Plan through a Table-Top exercise

What makes a useful exercise?

A Table-Top exercise (TTX) brings the organisations responsible for emergency response together to work through a realistic disruption. It tests whether the EP provides clear answers to practical questions: *Who decides? On what information? Within what time? Using which measures? How are decisions communicated and implemented?*

Participants act in their normal institutional roles, responding to developments introduced progressively and within defined response periods. The emphasis is on applying procedures and coordinating decisions, rather than simply discussing the plan. Observers record difficulties, and a concluding review identifies any corrective actions, responsible entities and completion dates. The value of the exercise lies in identifying and addressing weaknesses—not in completing the scenario without difficulties.

Moldova: testing a progressively worsening winter disruption

On 9 June 2026, Moldova's competent authority (Ministry of Energy), with support from the Energy Community Secretariat, organised a TTX involving around 80 participants from public authorities, the regulator, gas and electricity operators, suppliers, large consumers, combined heat and power plants and international partners.

The exercise simulated a progressively worsening winter gas-supply disruption, combining infrastructure constraints, reduced supply availability, adverse weather conditions and commercial difficulties. Participants worked at tables organised by institutional role, assessing successive developments and deciding whether crisis declaration or escalation was justified, what information was needed and which response measures remained available.

Discussions covered alternative supply routes, commercial and security stocks, demand reduction, and the implications for electricity and district heating. Simulated messages from

neighbouring authorities and operators tested cross-border coordination. The final stage addressed the restoration of supply and termination of crisis measures.

The subsequent exercise report identified priorities for follow-up, including simpler crisis-declaration procedures, verified, 24/7 available contact details, a common situation report during a crisis, more detailed interruptible customer data, clearer criteria for determining when market responses are insufficient, and stronger joint gas–electricity–heat procedures.

The example illustrates how testing can turn practical difficulties into specific recommendations, providing a basis for improving the national risk assessment, PAP and EP.

4.6 Monitoring and updating the plans

Adoption does not complete the planning process.

In accordance with Article 8(4), competent authorities must report regularly to the Security of Supply Coordination Group on progress in preparing and adopting the PAPs and EPs. They must also ensure regular monitoring of the implementation of those plans.

PAPs and EPs must be updated every four years after 1 May 2024, or more frequently where circumstances warrant or at the Energy Community Secretariat's request. Updates must reflect the updated risk assessment and the results of emergency testing.

The authority should also review whether changes in supply contracts, infrastructure availability, customer demand, storage access, legal requirements or institutional responsibilities materially affect the plans. Lessons from actual disruptions and implementation monitoring should inform this review.

Review should assess effectiveness as well as formal completion. A measure may have been introduced but no longer provide the expected protection because demand, market access or infrastructure conditions have changed.

The risk assessment, PAP and EP should remain consistent with one another. Changes such as the introduction of a new supply route may affect the risks identified, the preventive measures required and the emergency response procedures, and should therefore be reflected across all three documents, as appropriate.

The quality of the plans ultimately depends on whether they provide a credible basis for preventing and mitigating gas supply disruptions and a practical framework for a lawful, timely and coordinated response when disruptions occur.

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PAP & EP Policy Guidelines

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