

ENNOH

Annual Report 2025



H2



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ENNOH 2

President's & Director's Foreword

In 2025, ENNOH moved from concept to operational delivery. What in 2024 existed primarily as a legal mandate and an organisational blueprint has evolved into a collective ambition of future hydrogen transmission network operators (HTNOs), capable of structuring cooperation, delivering on its regulatory tasks and becoming a collective voice of HTNOs at the Union level.

The year was therefore defined by ramp-up and first deliveries. ENNOH established its governance structures, implemented a disciplined work programme, built up the core of its Brussels-based Secretariat, and launched the workstreams that will underpin future network planning, market integration, network codes, system operation and transparency. A recurring objective throughout the year was that ENNOH must demonstrate – early and consist-

ently – that it can deliver. From the initial Board discussions onwards, Members underlined the need to prioritise the most urgent regulatory deliverables while strengthening ENNOH's capabilities and resources. Step by step, ENNOH demonstrated its ability to translate cooperation into concrete functionality and outputs that institutions, regulators and stakeholders can rely upon.

Future HTNOs cooperating and staying united to deliver

Discussions and decisions within ENNOH throughout the year reflected both the scale of this responsibility and the maturity with which Members have approached it. In a context characterised by regulatory implementation, market uncertainty and high expectations from EU institutions and stakeholders, ENNOH focused on building the technical and governance foundations required to deliver on its mandate.

Progress on system planning and modelling was central to ENNOH's work. Key elements were advanced, including cost-benefit analysis enhancements, close cooperation with ENTSG on repurposing, and contributions to the Inter Linked Market Model together with ENTSG and ENTSO-E, underlining the importance of cross-sector analytical consistency for robust infrastructure planning. In parallel, ENNOH strengthened transparency and credibility by strategically adopting an open-source modelling tool in line with regulatory and stakeholder expectations. These efforts were complemented by preparatory groundwork on future EU network codes and structured stakeholder engagement, paving the way for the formal network code development process.

A key achievement in 2025 was the approval of ENNOH's statutory framework. The adoption of the final Articles of Association, Rules of Procedure and Rules for Stakeholder Consultation provided clarity on roles, decision making processes and accountability. This framework underpins credibility, transparency and effective cooperation with key partners, notably the European Commission, ACER, ENTSO E, ENTSG and the EU DSO Entity. ENNOH further reinforced its governance through the adoption of additional internal guidelines developed in line with its statutes and Regulation (EU) 2024/1789.

A consistent theme in 2025 discussions was that infrastructure will be delivered at pace only if financing and de-risking frameworks enhance projects' investability. On the basis of the mandate received from the Energy Infrastructure Forum, ENNOH therefore intensified and prioritised work on financing and de-risking, building analytical content jointly with ENTSG and engaging stakeholders through dedicated workshops and structured exchanges.

Organisational strengthening and cooperation arrangements

Throughout 2025, ENNOH's capabilities and resources increased steadily. The Secretariat grew to eight full time equivalents by year end, forming a motivated and committed team serving ENNOH and its Members while fostering close cooperation with EU institutions and stakeholders. This team, which will continue to grow in 2026, is now established in its own new Brussels office and supported by a consolidated corporate identity.

Furthermore, last year, ENNOH benefited from structured technical support from ENTSOG, which played a key role during this foundational phase. Cooperation with non EU operators also advanced and is expected to be mutually beneficial. In parallel, ENNOH strengthened its external engagement through targeted participation in conferences and workshops, as well as meetings with senior representatives of EU institutions and key stakeholders.

Looking ahead

The challenges ahead remain substantial, but ENNOH enters 2026 with a clear direction: to continue delivering core EU mandated outputs, to deepen cooperation across the energy system, and to further strengthen governance and internal capabilities. ENNOH will continue to act with professionalism, discipline and transparency – anchored in its mandate and driven by efficient and effective delivery. It remains committed to serving as a neutral, technically grounded entity where contributions received are translated into coherent planning, regulatory and technical outputs.

We thank all ENNOH Members for their engagement and valuable technical contributions, and we greatly appreciate the constructive exchanges and support from EU institutions, regulators and stakeholders throughout the year. Together, we are laying the groundwork for ENNOH to fulfil its role as a central pillar of Europe's future hydrogen system. Activity levels are set to intensify further in 2026 and beyond, and we look forward to continuing this journey together.

Christoph von dem Bussche, President

Abel Enriquez, Director

"ENNOH is becoming a cornerstone of Europe's hydrogen architecture. Our commitment to cooperation, transparency and credibility gives the long-term perspective needed to turn policy ambition into a functioning cross-border H₂ infrastructure system."

Christoph von dem Bussche, President



"2025 was about building the fundamentals of ENNOH: governance, teams, working processes and first deliverables. Our focus has been pragmatic and efficient – turning voluntary cooperation into concrete functionality and outputs that institutions, regulators and stakeholders can rely upon."

Abel Enriquez, Director

1 Organisational structure & Membership

1.1 ENNOH as a framework for cooperation among future HTNOs

In 2025, ENNOH operated as a structured framework for cooperation among future hydrogen transmission network operators (HTNOs), to be established pursuant to Regulation (EU) 2024/1789. While not yet legally constituted as an entity, ENNOH's activities in 2025 were carried out under a voluntary cooperation structure, with a clear mandate to deliver the regulatory tasks assigned to

ENNOH under the EU hydrogen market and infrastructure framework. This transitional set-up ensured the possibility to work on the ramp-up of the ENNOH, continuity of work, early delivery of key outputs, and inclusiveness of all future HTNOs, pending the fulfilment of the criteria for ENNOH's legal foundation.

1.2 Membership

At the end of 2025, ENNOH brought together future HTNOs from across the European Union, representing a broad geographical and system diversity, gathering 37 members from 26 EU member states, including an Associated Partner from Cyprus. Membership is open to future HTNOs.

MEMBERS

Austria	– Gas Connect Austria GmbH – TAG GmbH
Belgium	– Fluxys Belgium S. A.
Bulgaria	– Bulgartransgaz EAD
Croatia	– Plinacro
Czech Rep.	– NET4GAS, s.r.o
Denmark	– Energinet
Estonia	– Elering AS
Finland	– Gasgrid Finland Oy
France	– NaTran – TERÉGA
Germany	– bayernets GmbH – GASCADE Gastransport GmbH – Gasunie Deutschland Transport Services GmbH – NaTran Deutschland – Nowega GmbH – Ontras Gastransport GmbH – Open Grid Europe GmbH – terranets bw GmbH – Thyssengas GmbH

Greece	– DESFA S. A.
Hungary	– FGSZ Natural Gas Transmission
Ireland	– Gas Networks Ireland
Italy	– Snam Rete Gas S.p.A. – Società Gasdotti Italia S.p.A
Latvia	– Conexus Baltic Grid
Lithuania	– AB Amber Grid
Luxembourg	– Creos Luxembourg S. A.
Netherlands	– Hynetwork
Poland	– Gas Transmission Operator GAZ-SYSTEM S. A.
Portugal	– REN – Gasodutos, S.A.
Romania	– Transgaz S.A.
Slovak Rep.	– eustream, a.s.
Slovenia	– Plinovodi d.o.o.
Spain	– Enagás S.A.
Sweden	– Nordion Energi

ASSOCIATED PARTNERS

Cyprus	– Ministry of Energy, Commerce and Industry
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In addition to Members with voting rights, ENNOH may include Associated Partners and Observers, in line with its statutory documents. These categories allow for the involvement of entities from Member States where hydrogen transmission activities are not yet established, as well as non-EU operators and other relevant parties, under clearly defined participation and financial contribution rules.

Membership contributions to ENNOH's annual budget are calculated in accordance with the Statutes, based on Members' composite voting rights. This approach ensures proportionality, fairness and transparency, while providing ENNOH with the financial stability required to implement its Annual Work Programme.

1.3 Governance bodies

ENNOH's governance structure is designed to ensure balanced representation, efficient decision-making and strong accountability. It is composed of the General Assembly, the Board, the President and Vice-Presidents, supported by the ENNOH Secretariat.

The General Assembly is ENNOH's highest decision-making body and brings together all Members. In 2025, the General Assembly approved the Annual Work Programme and budget, adopted ENNOH's statutory documents, decided on financial contributions, and provided strategic guidance on ENNOH's development and future legal foundation.

The Board is responsible for steering ENNOH's activities between General Assembly meetings. It oversees the implementation of the Annual Work Programme, monitors budget execution, approves the launch of working groups and task forces, and ensures coherence between technical workstreams and ENNOH's mandate. Board decisions are taken by consensus where possible, reflecting ENNOH's cooperative nature.

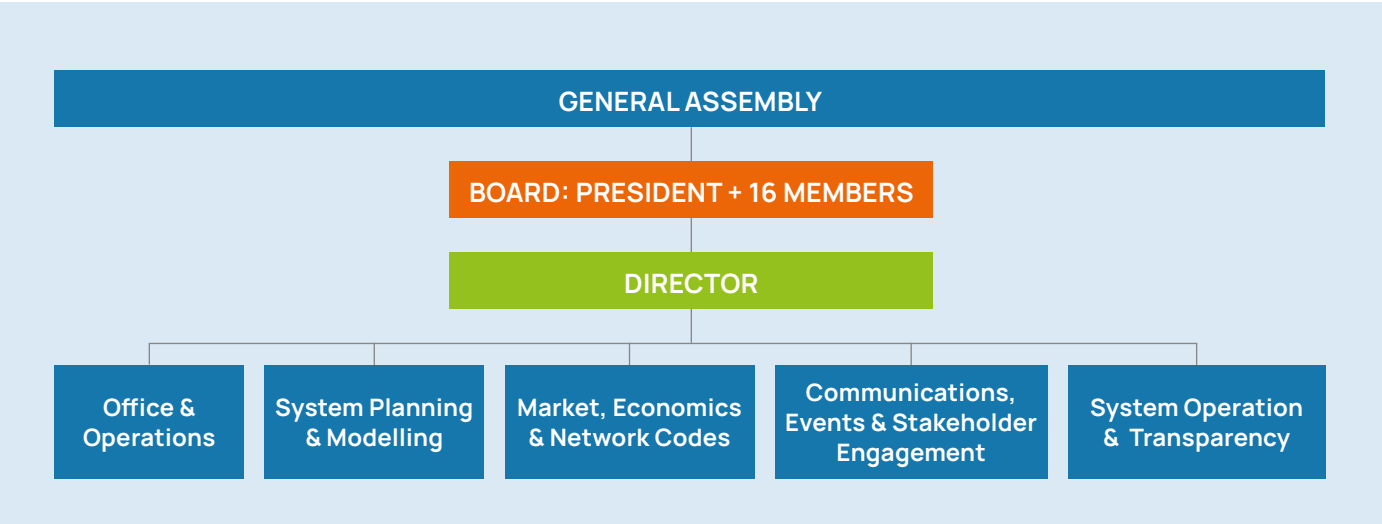
The President represents ENNOH externally and ensures the proper functioning of its governance bodies. Vice-Presidents support the President in setting the agendas for Board meetings and in the association's external representation when needed.

1.4 The Secretariat and Internal Working Structure

The ENNOH Secretariat is responsible for the day-to-day management and coordination of ENNOH's activities. In 2025, the Secretariat was progressively built up, reaching eight full-time equivalents by year-end. It brings together expertise in planning and modelling, markets and network codes, system operation and transparency, communications and events organisations, regulatory intelligence, and organisational support.

The Secretariat operates under the authority of the ENNOH Director and supports the governance bodies, working groups and task forces in delivering ENNOH's regulatory tasks. In 2025, the Secretariat became established in its own new Brussels office, strengthening ENNOH's operational capacity and institutional presence.

The work of ENNOH is structured around areas, working groups and task forces. The internal working structure at the end of 2025 can be seen in the figure below.



1.5 Cooperation arrangements

To ensure efficiency and continuity during its build-up phase, ENNOH relied on structured cooperation arrangements, notably with ENTSOG. Technical support provided under a service and cooperation framework enabled ENNOH to leverage existing expertise while progressively developing its own independent capabilities.

ENNOH also maintained close cooperation with ENTSO-E, the EU DSO Entity, ACER and the European Commission, as well as targeted engagement with stakeholders and

non-EU operators. These arrangements were guided by a clear principle: cooperation should enhance coherence and delivery, while fully respecting ENNOH's mandate, governance and independence.

Together, these organisational and membership arrangements provided a robust foundation for ENNOH's activities in 2025 and for its continued development in the years ahead.



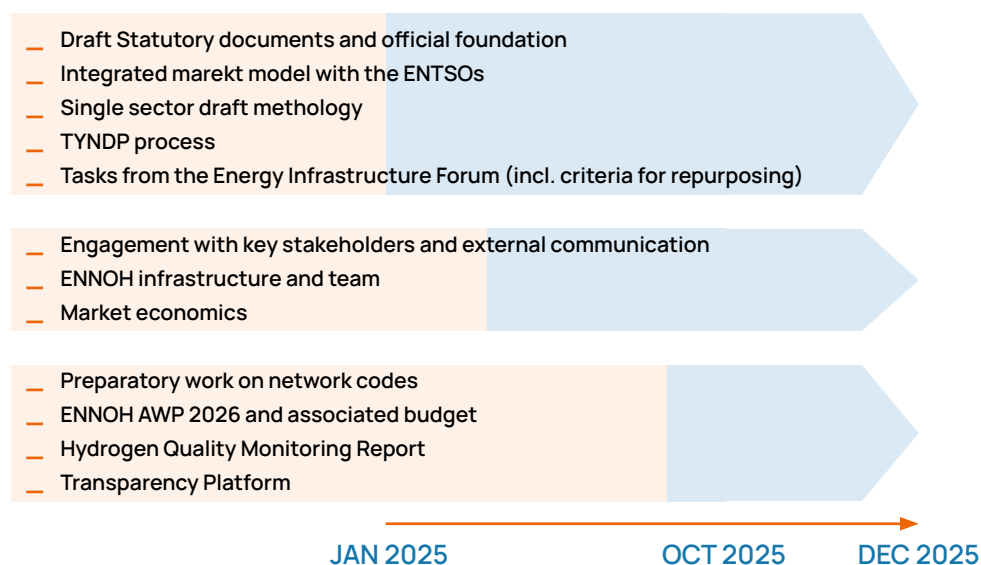
2 Summary of ENNOH's activities & deliverables in 2025

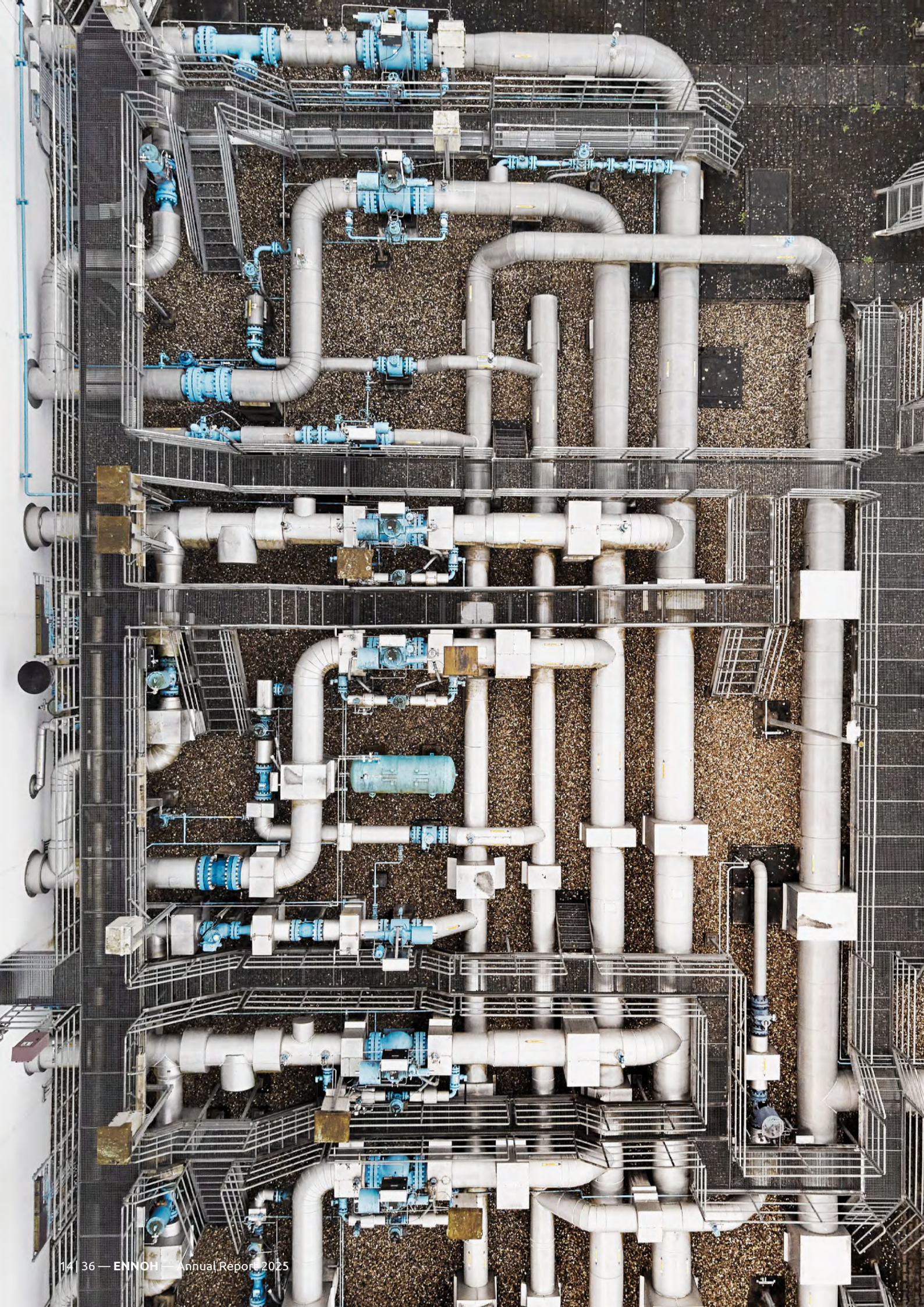


Activity to be delivered in 2025 (_ Goals)	Delivered?	Comments
TASKS ALLOCATED BY REGULATION		
TYNDP Process - Cooperation with ENTSG, ENTSO-E, and other relevant key stakeholders. - Start acquiring and building internal capabilities.	Yes	Following the recruitment, the ENNOH Team dealing with System Planning and Modelling started cooperation with ENTSG, ENTSO-E, and other relevant key stakeholders. The ENNOH Team also started to build internal capabilities and technical expertise.
Inter-linked and Integrated Market Model (ILM) - Cooperate with ENTSG and ENTSO-E in the preparation of the report. Approve ToR to define each party's role and responsibilities. - ILM report to be sent to ACER and EC by the end of October 2025	Yes	ENNOH worked closely with ENTSG and ENTSO-E on the preparation of the ILM report. The report was published at the end of October by ENTSG and ENTSO-E, acknowledging the contribution of ENNOH.
Single-Sector Draft Methodology (CBA methodology) - Engagement with the Stakeholders, including workshop - Public Consultation on CBA methodology - Publication by December 2025	Yes/ partially	The ENNOH CBA methodology should have been published in December 2025. However, as ENNOH was not yet legally established at that time, the European Commission and ACER recommended allowing additional time for stakeholder engagement. An intermediate report will be published at the beginning of March 2026.
Hydrogen Quality Monitoring Report Launch of the work and engagement with stakeholders about the process	Yes	The ENNOH System Operation and Transparency Working Group (SOT WG) started its activities in December 2025. Its first priority was the preparation of the Hydrogen Quality Monitoring Report, planned for May 2026.
Market, Economics and Preparatory work on Network Codes - Deal with regulatory issues, including the ACER recommendation on the methodologies for setting the inter-temporal cost allocation - Initiate preparatory groundwork on the key/ basic Network Codes - Start regular discussions with key stakeholders	Yes	The Market, Economics and Network Codes Working Group (MENC WG) addressed several regulatory issues in 2025, including ACER's work on inter-temporal cost allocation. It also carried out preparatory work on Network Codes in cooperation with the Commission and ACER. A stakeholder workshop was organised in October, followed by a public consultation launched on 20 October. Regular stakeholder discussions are ongoing and will continue in 2026.
Transparency Platform Launch of the working group to work on this.	Yes	Within the SOT WG launched in December 2025, Terms of Reference were agreed, including work on the Transparency Platform. The ENNOH team also prepared a work schedule and allocated a specific budget for its development.

Activity to be delivered in 2025 (_ Goals)	Delivered?	Comments
Criteria for Repurposing - Preparation and publication of joint report together with ENTSG - Presentation to the Energy Infrastructure Forum 2025, and engagement with stakeholders including a workshop organisation.	Yes	ENTSG and ENNOH developed a joint report on criteria for repurposing gas infrastructure into hydrogen. The draft report was presented to the Energy Infrastructure Forum 2025, at the beginning of June. A stakeholder workshop was held in September, and the final report was jointly published in November.
Offshore Planning Strengthen collaboration with electricity and gas operators, and all the relevant stakeholders	Yes	ENNOH has set up contact and cooperation with HyNOs and the NSEC Platform. Cooperation with ENTSG-E in view of the next Offshore Network Development Plan is planned.
TASKS RELATED TO ENNOH ESTABLISHMENT AND ENNOH'S OPERATIONS		
Draft Statutory Documents and Official Publication - Liaise with ACER and DG ENER regarding the refinement of the ENNOH's Statutory Documents - Publication of the final statutory documents to be approved by the General Assembly	Yes	submitted draft statutory documents to ACER and the European Commission in August 2024. ACER's opinion was published at the end of 2024, followed by the Commission's opinion in May 2025. During Q1-Q2 2025, ENNOH worked closely with ACER and DG ENER to refine the documents, which were adopted by the General Assembly at the end of June and published in early July on ENNOH's website.
ENNOH Office - Finding and renting an office for ENNOH. - Refurbishing and furnishing the new office.	Yes	The ENNOH team identified new office premises in Brussels and signed a rental contract before summer 2025. Renovation, refurbishment and furnishing were completed in the second half of the year, in line with the Board-approved budget and timeline. The team moved into the new offices in early 2026.
ENNOH Team Execution of the foreseen Recruitment Plan	Yes	The recruitment plan outlined in the AWP 2025 was implemented, with minor delays in some positions. By the end of 2025, the ENNOH Secretariat comprised eight staff members, as approved by the General Assembly.
External Image and Corporate Image - Revamping of ENNOH's website and consultation platform. - Development of a Corporate Image	Yes/ongoing	The new website was presented to the General Assembly in December 2025 and entered operation a few weeks later. The website includes a functionality to collect contributions during public consultations. The development of the new Corporate Image was initiated in Q4 2025 and will be implemented in Q1 2026.
External Communication - Informing external stakeholders (LinkedIn posts, press release) on ENNOH's activities and major H₂-infrastructure-related developments; liaise with press/media - Positioning ENNOH in the EU H₂ ecosystem – interventions in external events and fora; meetings with EC, ACER and key stakeholders.	Yes	During 2025, ENNOH published more than 90 posts on LinkedIn, and got more than 2200 followers. A press release was launched in Q4 2025, and media contacts took place in different moments during the year. ENNOH representatives participated in more than 60 different events (workshops, conferences, fora, etc.) during 2025. The aim was to present ENNOH to the interested parties, and position ENNOH as a key actor in the EU H ₂ ecosystem.

Activity to be delivered in 2025 (_ Goals)	Delivered?	Comments
Cooperation and Coordination with third parties - Regular contact/relationships with key associations and stakeholders, such as ENTSO-E, ENTSOG, the EU-DSO entity, ACER's team, DG ENER, HE, ECH2A and other key stakeholders. - Cooperation with H₂ storages, H₂ terminals, project developers for electrolyzers and blue hydrogen, demand-side users, - Cooperation with third-country operators (e.g. Switzerland)	Yes	In the framework of ENNOH's activities, and ENNOH's ramp-up actions, regular contacts and meetings with the key associations and stakeholders mentioned in the AWP25 took place during the year. Regarding the cooperation with third-country operators, ENNOH and the Swiss Operators launched an official process to set up a bilateral cooperation agreement in 2026. Exchanges with UK Operators also took place in 2025.
Founding Ceremony and Legal Establishment of ENNOH - Founding Ceremony, including a conference to be organised alongside. - Legal Establishment of ENNOH as a non-profit international association under Belgian law	No	The General Assembly decided to postpone the legal foundation and founding ceremony of ENNOH to a later future, to be determined by the ENNOH General Assembly.
Annual Work Programme 2026 and associated Budget Preparation, internal discussion and adoption by the Board and General Assembly	Yes	The Annual Work Programme 26 (AWP26) and associated budget were discussed and validated internally at working level and by the Board in Q3-Q4. The ENNOH General Assembly approved the AWP26 and associated budget in December 2025/
Service Contract with ENTSOG 2025 Signature of Service Contract by all ENNOH members	Yes	ENNOH team, in cooperation with ENTSOG, drafted the Service Contract 2025 which was later approved internally. ENNOH Team facilitated the signature of the Service Contract between ENTSOG and the ENNOH founding members for the year 2025.





3 System Planning & Modelling

System Planning & Modelling provides the analytical foundations for the development of Europe's future hydrogen network. The department supports ENNOH's mandate in long-term infrastructure planning by developing and applying transparent, consistent and robust analytical approaches. Its work ensures that hydrogen network needs are assessed on a sound methodological basis and that planning processes are underpinned by credible data and modelling.

The department brings together methodological development, scenario analysis and system-wide assessments at European level. This includes the analytical work underpinning the Ten-Year Network Development Plan, such as scenario development, system needs assessment and cost-benefit analysis, as well as the development and maintenance of advanced modelling tools. Close cooperation with ENTSG and ENTSO-E ensures cross-sector consistency and supports the coherent integration of hydrogen planning with gas and electricity system perspectives.

Through these activities, System Planning & Modelling contributes to efficient, reliable and transparent hydrogen infrastructure planning. The department's outputs support European policy processes, inform long-term planning discussions and provide an objective analytical basis for future infrastructure development, while remaining strictly non-regulatory and independent of investment or project approval decisions.

3.1 Work Structure

The activities within the System Planning and Modelling area were structured mainly through the Planning and Modelling Working Group (P&M WG). There have been and still are several Task Forces (TF) which are connected to this WG. These TFs include the Task Force for Repurpos-

ing Principle, the Taskforce for the drafting of the Cost-Benefit Analysis (CBA) Single-Sector Methodology and the Task Force on the Interlinked Modelling (ILM) framework.

3.2 Planning and Modelling Working Group

Over the past year, the Planning and Modelling Working Group has continued to strengthen ENNOH's analytical, methodological and strategic foundation across all areas relevant to European hydrogen infrastructure planning. As the body responsible for steering the direction of ENNOH's system planning and modelling activities, the Working Group not only guided the evolution of the overall framework but also oversaw and shaped the work of the dedicated Task Forces. Their outputs are described in detail in the following sections.

A major milestone this year was the decision on the modelling tool that will form the technological backbone of ENNOH's analytical work. After a structured assessment and several months of discussion across Working Group, Secretariat and Board level, ENNOH decided to adopt

PyPSA as its primary modelling environment from 2026 onward. PyPSA's open source architecture, its proven ability to simulate integrated hydrogen electricity gas systems and its strong community support make it particularly well suited to the organisation's needs. Its transparency and extensibility align closely with ENNOH's commitment to methodological clarity and reproducibility, while significantly reducing long term licensing costs and enabling the recruitment of a broader pool of modelling talent familiar with open source tools.

Another key achievement was the Working Group's contribution to defining ENNOH's future resource needs and areas of technical focus. As ENNOH prepares to take on its full responsibilities under the Hydrogen Regulation, particularly in the development of the TYNDP 2028 methodologies for System Needs Assessment and Cost-Benefit Analysis, it became increasingly important to establish a clear understanding of the internal capabilities required to support these tasks. The Group therefore worked closely with the Secretariat to formulate guidance on additional full time equivalents needed for modelling, data management and methodological development. This assessment also clarified the future work focus of the area.

3.3 Repurposing TF

The Repurposing Task Force played a central role in advancing ENNOH's contribution to Europe's emerging hydrogen infrastructure framework, working in close cooperation with ENTSG. Its work originated from the mandate issued at the Copenhagen Energy Infrastructure Forum in 2024, where ENNOH, together with ENTSG and ACER, was formally invited to develop a coherent and transparent set of criteria for repurposing existing natural gas infrastructure for hydrogen transport.

Building on this mandate, the Task Force coordinated a structured and evidence-based development process throughout 2025, integrating technical, regulatory and system-planning perspectives. A first version of the repurposing criteria was presented at the Copenhagen Energy Infrastructure Forum in 2025. Following this presentation, the Forum explicitly requested ENNOH and ENTSG to subject the proposed framework to stakeholder consultation in order to further test its robustness and practical applicability.

3.4 CBA TF

The Cost-Benefit Analysis Task Force was responsible for drafting the CBA methodology in accordance with the mandate set out in the Hydrogen Regulation. The original submission of the draft methodology was foreseen for 1 December 2025. However, due to the delayed formal establishment of ENNOH, it was agreed with the European Commission and ACER to postpone the submission until ENNOH is formally established.

A key activity during the year was the public consultation on the draft [CBA methodology](#), which was conducted from mid-September to mid-December 2025 and included a dedicated stakeholder consultation workshop in October. The consultation enabled stakeholders from across the energy system to provide structured feedback on model-

Through these achievements, the Working Group has positioned ENNOH for the next phase of its institutional development and prepared the ground for a more mature and comprehensive modelling landscape. Its work this year ensured not only methodological coherence across the association's planning activities, but also the strategic readiness needed to meet the demands of the upcoming TYNDP cycle and the wider European hydrogen system transition.

In response, the Task Force conducted a dedicated consultation process, including a stakeholder workshop held in September 2025. Input from system operators, industry associations, regulators and technical experts was used to refine the criteria, with particular attention to technical feasibility, security-of-supply considerations and economic assessment aspects.

The final version of the "[Criteria for Natural Gas Infrastructure Repurposing](#)" report was published in November 2025. The framework establishes a clear three-step assessment logic covering hydrogen system needs, impacts on gas security of supply and economic efficiency. The criteria are being integrated into TYNDP-related processes and will support transparent and consistent assessments of infrastructure repurposing across Europe.

ling assumptions, the representation of hydrogen system benefits and the integration of socio-economic welfare indicators. In total, nine stakeholders participated, representing a balanced mix of system operators, industry, regulatory and expert perspectives. The feedback received provides a strong basis for further improving the methodology.

Throughout the development and consultation process, the Task Force worked in close cooperation with ACER and the European Commission to ensure alignment with regulatory expectations. The Task Force will continue its work in 2026, with the objective of submitting the CBA methodology once ENNOH is formally established.

3.5 ILM TF

The Interlinked Modelling (ILM) Task Force continued to play a central role in shaping the cross-sector analytical foundations used by ENTSO-E, ENTSG and ENNOH. Although ENNOH was not yet legally established and therefore could not publish documents in its own name, ENNOH experts actively contributed throughout the year to the further development and refinement of the ILM framework.

Working in close cooperation with ENTSO-E and ENTSG, the Task Force supported the consolidation of methodological improvements reflected in the Interlinked Modelling Report, which was published on 31 October 2025. The report, including the Interlinked Modelling Framework Roadmap, sets out the future ambition for interlinked

modelling, covering enhanced data harmonisation, increasing hydrogen system maturity, the gradual introduction of cross-sector system needs assessment and the long-term industrialisation of modelling processes. ENNOH's involvement ensured that hydrogen-specific aspects were systematically integrated into the shared analytical framework.

The Interlinked Modelling Report and its Roadmap were consulted with the TYNDP Scenarios Stakeholders Reference Group and are being submitted to the European Commission and ACER, as required under Regulation (EU) 2022/869, as amended by Regulation (EU) 2024/1789.

3.6 Reasoning

The activities carried out in 2025 were largely preparatory in nature and focused on laying the analytical, methodological and organisational foundations for ENNOH's future responsibilities. Throughout the year, ENNOH contributed actively to key workstreams alongside ENTSG and ENTSO-E, ensuring continuity and readiness for the transition of tasks mandated under the Hydrogen Regulation.

Building on the progress achieved in interlinked modelling, repurposing criteria and cost-benefit analysis methodologies, the work in 2025 positions ENNOH to progressively assume a more central and formal role from 2026 onwards. The foundations laid in 2025 will support a structured scaling-up of ENNOH's responsibilities in the coming years and contribute to the effective planning of Europe's hydrogen infrastructure.





4 Market, Economics & Network Codes

The Market, Economics and Network Codes department is responsible for the market design of the hydrogen network. It consists of one Working Group and one Task Force:

- MENC WG – Market Economics and Network Codes Working Group
- FDR TF – Financing and De-risking Task Force (a task force to report to the MENC WG).

The MENC WG has elaborated a Groundwork paper on initial views of the market design and the main features to discuss while elaborating Network Codes in the future (the “Groundwork Paper”). The purpose of the Groundwork paper is to present ENNOH initial ideas and considerations on the future market design rules and test them with the market. The considerations covered by the Groundwork paper relate to the future rules on access to the hydrogen infrastructure, to the financing of hydrogen infrastructure, as well as to further important areas (e.g. interoperability, cybersecurity).

ENNOH consulted stakeholders on this document during a public workshop on 14 October 2025 and via a public consultation, which lasted from the end of October 2025 till 10 January 2026. A variety of stakeholders (associations, as well as other market participants) provided feedback to the consultation. In general, positive reactions were expressed on the ENNOH initiative and the proposed ideas and the market participants acknowledged the need to address market design issues already today. The topics of financing and de-risking of infrastructure investments, as well as of hydrogen quality, were recognised as the most important ones for the emerging hydrogen market. Following the public consultation, ENNOH is now updating the Groundwork Paper with a view of potentially presenting it at the first hydrogen forum to be held in March 2026 in Rotterdam. The Groundwork Paper will be published on the ENNOH website as a position paper and will be regularly revised to reflect the market needs and developments. It will not have a status of a legally binding document and will not prejudice the future rules to be laid down in network codes, as provided for in the Gas & Hydrogen Regulation.

The FDR TF is specifically dedicated to one topic related to the market design: financing and de-risking investment in hydrogen infrastructure. This Task Force has been set to deliver at the 2026 edition of the Copenhagen Energy Infrastructure Forum a report, elaborated with ENTSG, on de-risking options. Furthermore, the TF is engaged in collaboration with the European Commission, ACER and EIB on financing and -de-risking developments and addresses economic and financial aspects related to tasks of the other working groups. It will also be preparing draft proposals on the future network codes regarding financing and de-risking aspects.

In the framework of the currently most relevant task – preparation of a de-risking report for the next Copenhagen Infrastructure Forum – ENNOH, together with co-author of the report ENTSG, and have organised a closed-door workshop with the support of the CSEI – Copenhagen School of Energy Infrastructure – on 27 November 2025 to brainstorm on this issue and possible remedies. The next public workshop planned to be organised in Brussels in March and to be followed by a public consultation will ensure a broader stakeholder involvement on this issue.



5 Regulatory & Policy Development

The Regulatory Intelligence, Positioning and Communication Working Group (RPC WG) was formally launched in February 2025. This working group scrutinised the European legislative and regulatory actuality to better understand the legal framework where the hydrogen networks will navigate.

The WG elaborated ENNOH positioning on key regulatory developments and prepared answers to relevant public consultations while ensuring strict alignment with ENNOH's legal mandate under Regulation (EU) 2024/1789. The group monitored key policy initiatives, including the EU Grids Package, the revision of the TEN-E framework, electrification initiatives, security-of-supply discussions and related infrastructure planning files, enabling ENNOH to anticipate regulatory developments and coordinate informed institutional engagement.

Through this group, ENNOH prepared an answer to the European Commission's public consultation on the EU Grids Package ensuring consistency with the organisation's planning, modelling and market-related workstreams. The

answer also developed positioning on offshore hydrogen pipelines and contributed to internal reflections on financing and de-risking frameworks at EU level. Other processes where ENNOH participated via this group were the EU Commission public consultation on the Electrification Action Plan, the EU Commission discussions on Security of Supply, or the engagement as facilitating organisation within the European Clean Hydrogen Alliance.

At the end of 2025, this group introduced a new regulatory monitoring service, to share ad-hoc updates on major EU policy/regulatory developments with the members and complement information provided during the meetings. The RPC WG was relabeled as Regulatory & Policy Development WG (RPD WG) in December 2025.

6 System Operation & Transparency

System Operation & Transparency area covers, among others, the activities related to the following topics:

- Hydrogen quality
- Transparency platform
- EIC codes and establishing ENNOH as Liaison Issuing Office (LIO)
- Hydrogen Emissions
- Security and Cybersecurity
- R&D and Innovation
- Interoperability NC
- Data Exchange and Reporting Issues
- Standardisation Processes

The System Operation & Transparency Working Group (SOT WG) was created on 1st December following the arrival of Daniel Bonnici, Senior Advisor for System Operation and Transparency, to the ENNOH Team.

Daniel Bonnici is in charge of chairing the SOT WG. He can be supported by group members who volunteer to be in a reduced drafting team for concrete deliverables.

Once installed, the SOT WG immediately started to work on H₂ quality in view of the first ENNOH hydrogen quality monitoring report to be published by 15 May 2026. The consultation documents were prepared within the SOT WG for the public consultation to be launched in early 2026. The WG also started to organise a H₂ Quality workshop to be organised in Q1 2026. This group will get full speed in 2026, according to the activities included in the ENNOH Annual Work Programme 2026.



7 External Communication & Stakeholder Engagement

7.1 Social media and press releases

In 2025 ENNOH kept the stakeholders and interested parties informed about its activities via two social channels: LinkedIn and BlueSky. In this sense, during 2025, ENNOH published more than 90 posts on LinkedIn in 2025 and ended the year with +2,200 followers. ENNOH used its website as an external communication channel adding relevant information about ENNOH's deliverables, public

consultation, workshops and other relevant announcements.

The first ENNOH press release was issued on 10 December 2025 on the occasion of the publication of the EU Grids Package by the European Commission.

7.2 Ennoh stakeholder consultations, relevant events, and ennoh workshops 2025

The table below shows the list of ENNOH's relevant activities performed during 2025, including publications, public consultations, stakeholder workshop among others.

2–3 June	Presentation at the Energy Infrastructure Forum (Copenhagen) together with ENTSG: Draft Joint Report on Criteria for Natural Gas Infrastructure Repurposing
25 June	Adoption of Final ENNOH Statutory Documents followed by the ENNOH Stakeholder' Summer Reception
15 Sep–12 Dec	Public Consultation: ENNOH's first draft Cost–Benefit Analysis (CBA) Single-Sector Methodology
18 Sep	ENTSG – ENNOH Stakeholder Workshop: Joint Report on Criteria for Natural Gas Infrastructure Repurposing
14 Oct	ENNOH Stakeholder Workshop: Preparatory Groundwork in the area of Network Codes
16 Oct	ENNOH Stakeholder Workshop: ENNOH's first draft Cost–Benefit Analysis (CBA) Single-Sector Methodology
20 Oct–31 Jan	Public Consultation: Preparatory Groundwork in the area of Network Codes
30 Oct	ENNOH contributed to the Interlinked Modelling Report published by ENTSG-E and ENTSG
18 Nov	Publication of the Final version of the Joint Report on Criteria for Natural Gas Infrastructure Repurposing
27 Nov	ENTSG – ENNOH Stakeholders Workshop: ENNOH and ENTSG's Workshop on De-Risking Investment in Hydrogen Infrastructure

Publications; Public Consultations; Events



8 Communication & Events

8.1 Communications

In 2025, ENNOH's communications activities focused on strengthening clarity, accessibility and engagement during a year marked by organisational ramp-up and the delivery of first regulatory outputs.

A key milestone was the rebranding of ENNOH's website and corporate branding materials. This work aimed to provide a clearer articulation of ENNOH's role, mandate and added value, and to make it easier for stakeholders to understand how ENNOH operates and delivers impact in cooperation with its members. In parallel, ENNOH launched its first newsletter, establishing a regular channel to keep members informed, aligned, and engaged with ongoing work and upcoming milestones.

ENNOH also expanded and diversified its digital communications. Social media channels were populated with content produced in-house, including video campaigns developed together with members, contributing to a significant increase in engagement and almost a 50 % growth in followers on LinkedIn over the year. In addition, ENNOH established a presence on BlueSky, broadening its digital footprint and future-proofing its outreach channels.

In 2025, ENNOH also published its first joint report with ENTSG on Criteria for Natural Gas Infrastructure Repurposing.

External communications were further strengthened through the release of ENNOH's first press release, issued in the context of the European Commission's EU Grids Package communication. This marked an initial step in structured media engagement, ensuring ENNOH's perspective was communicated clearly and consistently at a key policy moment.

In support of members, ENNOH announced a new Regulatory and Policy Updates service. This service was designed to provide concise and structured information on regulatory and policy developments, explaining what has changed, why it matters, and the next steps ahead, thereby supporting members' preparedness and situational awareness.

Finally, in 2025, the Board approved the creation of a dedicated Communication and Events Working Group (CE WG), scheduled to become operational in 2026. The CE WG will support ENNOH in developing and implementing its communication strategy, coordinating events, and ensuring effective engagement with stakeholders, media and the wider hydrogen community, in line with ENNOH's mandate and governance framework.

8.2 Events

In 2025, ENNOH's events-related activities complemented its communications work by supporting technical exchange, regulatory processes and institutional positioning. ENNOH participated in more than 30 external events over the year, including panel discussions and moderated sessions. These engagements provided opportunities to present ENNOH's mission, explain its role within the evolving EU hydrogen framework, and increase awareness of its activities among relevant audiences.

In addition to external participation, ENNOH organised a series of targeted workshops closely linked to its work programme. Two workshops were held in connection with ENNOH's public consultations, focusing respectively on the first draft Cost-Benefit Analysis (CBA) Single-Sector

Methodology and on future hydrogen Network Codes. These workshops supported informed stakeholder engagement and facilitated structured exchanges on complex technical and regulatory topics.

A third workshop was organised jointly with ENTSG, in close cooperation with the Copenhagen School of Energy Infrastructure, on the topic of de-risking investment in hydrogen infrastructure. This event provided a dedicated forum to explore financing and risk-related challenges, bringing together expertise from across the sector and supporting ongoing analytical work in this area.



9 ENNOH Establishment

In 2025, the Ad-hoc Group on ENNOH Establishment (AGEE) played a central role in supporting the organisational and governance development of ENNOH. Established in January 2025, AGEE was mandated to prepare the conditions for ENNOH's effective functioning under Regulation (EU) 2024/1789, while managing the transition towards future legal establishment.

A core task of AGEE was the preparation, review and finalisation of ENNOH's statutory framework. This included detailed work on the Articles of Association, the Rules of Procedure and the Rules of Procedure on Stakeholder Consultation. AGEE coordinated the technical and legal assessment of the opinions issued by ACER and the European Commission, prepared ENNOH's position papers in response, and developed concrete amendment proposals to ensure compliance with the regulatory framework while preserving ENNOH's operational viability. This work culminated in the adoption of the final statutory documents by the General Assembly in June 2025, with appropriate transitional provisions reflecting ENNOH's status as a voluntary cooperation structure pending legal foundation.

Beyond the statutory documents, AGEE also supported the broader establishment process, including preparing the ENNOH founding pathway and developing additional internal rules and guidelines foreseen in the statutes. The group further contributed to defining the criteria for triggering ENNOH's legal foundation, ensuring a balanced, inclusive, and pragmatic approach acceptable to Members and aligned with discussions with the European Commission.

In parallel, AGEE undertook monitoring and analysis of the transposition of the Gas and Hydrogen Directive at the national level, including through targeted questionnaires. This work provided valuable input to ENNOH's strategic discussions and interactions with EU institutions and stakeholders.

Through its activities in 2025, AGEE enabled ENNOH to move from draft structures to an agreed and operational governance framework, laying the legal and organisational foundations for ENNOH's continued delivery of its EU-mandated tasks and for its future legal establishment.

10 ENNOH Board & Team

ENNOH Board

The ENNOH Board was appointed by the ENNOH General Assembly in December 2024. It is made of 17 members, including the ENNOH President.

On this pages you can see all ENNOH Board members, as December 2025.



**Christoph von dem
Bussche** (GASCADE)





Gaetano Mazzitelli*
(SNAM)



Nicolas Peugniez*
(Naturan)



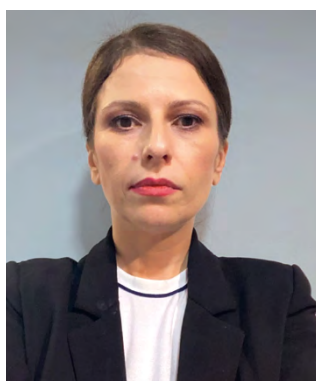
Sara Kärki* (Gasgrid
Finland/Gasgrid vetyverkot)



Szabolcs Ferencz
(FGSZ)



Agnieszka Ozga
(GAZ-SYSTEM)



Andra Vlahbei
(Transgaz)



Arno Bux
(Fluxys Hydrogen)



Caroline Bertlin
(Nordion Energi H2)



Detlef Brüggemeyer
(Open Grid Europe)



Edwina Nyhan
(Gas Networks Ireland)



Helmi Botter (Gasunie –
HyNetwork Services)



Michal Slabý
(Net4Gas)



Luis Ignacio Parada
(Enagás Infraestructuras
de Hidrógeno)



Michael Thomadakis
(DESFA)



Pedro Furtado
(REN Gás)



Rastislav Ľukovič
(eustream)

Team members



Abel Enríquez

Director



Gabriela Czetoova

Office & Operations Manager



Alexander Kättlitz

Co-Head of System Planning
& Modelling



Nils Melcher

Co-Head of System Planning
& Modelling



Helena Astachowskaja

Co-Head of Market, Econom-
ics & Network Codes



Claude Mangin

Co-Head of Market, Econom-
ics & Network Codes



Daniel Bonnici

Head of System Operation
& Transparency Experienced
Adviser



Carolina Bártolo

Communications, Events &
Stakeholders Adviser



11 ENNOH Financial Advisory Group

11.1 ENNOH Financial Advisory Group (FAG): Scope and Composition

The Financial Advisory Group (FAG) was formally established by the ENNOH General Assembly on 23 January 2025 as an internal advisory body supporting the financial governance of ENNOH. The decision was taken in the

context of the approval of the Annual Budget 2025 and the discussion on individual financial contributions of ENNOH members .

11.2 Scope and Role

The General Assembly decided that the Financial Advisory Group shall:

- Monitor the implementation of the ENNOH annual budget, including expenditure trends and financial execution;
- Assist the Director in the preparation of future annual budgets, starting with the Budget 2026, with a particular focus on financial and legal aspects;

- Contribute to transparency and accountability towards both the Board and the General Assembly, without holding any decision-making powers.
- The FAG operates as a supporting and advisory structure. Responsibility for budget execution and reporting remains with the ENNOH Director, who is mandated to report periodically to the Board and the General Assembly on budgetary developments.

11.3 Composition

The General Assembly indicated that the Financial Advisory Group should be composed of at least three to four members but not too many to keep it as an operational and agile group. Following reminders by the Director, the FAG members were appointed by their respective General

Assembly members as participants to the group on a voluntary basis. The FAG is chaired by the Director with the support of the Office and Operations Manager. This group does not have a fixed mandate duration, confirming the non-statutory and flexible nature of the group.

11.4 Activity in 2025

During 2025, the Financial Advisory Group met on multiple occasions and was actively involved throughout the year, in line with the mandate defined by the General Assembly. Its work focused on monitoring and supervising the evolution of ENNOH's annual budget, with particular attention to expenditures incurred and to the effective delivery of the Annual Work Programme. Through regular exchanges, the Group supported transparency and financial discipline, ensuring that budget execution remained aligned with the priorities and objectives approved by the General Assembly.

In addition, the Financial Advisory Group played a substantive role in specific financial dossiers. This included assisting the Director in the preparation and reassessment of the budget for the comprehensive renovation of ENNOH's new office, where several adjustments were re-

quired compared to the initial proposal presented to the General Assembly in January 2025. The Group was also intensively involved in the preparation of ENNOH's Annual Budget for 2026, engaging directly in all revisions requested by the Board and the members. It reviewed, assessed, and advised on successive proposals submitted by the Director, contributing to their refinement and improvement. This process culminated in the adoption of a unanimous recommendation to the ENNOH Board, which was subsequently approved and validated by both the Board and the General Assembly in December 2025.

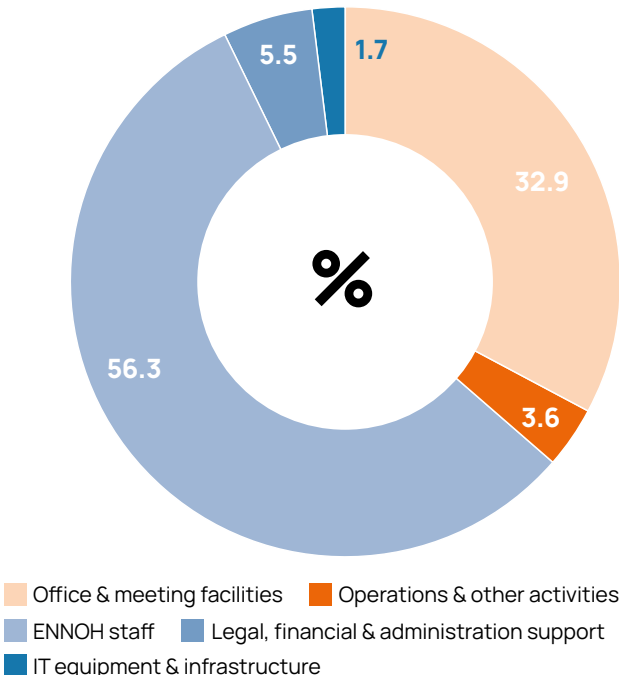


12 Financial Statement 2025

The annual budget of ENNOH for 2025, as approved by the General Assembly in January 2025, amounted to 2 MEUR. In addition, ENNOH entered 2025 with accumulated reserves of 0.182 MEUR originating from the 2024 financial year. These reserves were deliberately not used during 2025 and, in line with the decision of the General Assembly, will remain fully available for use in 2026. This approach reflects a prudent financial strategy aimed at supporting ENNOH’s progressive institutional consolidation.

At year-end 2025, actual expenditure amounted to approximately 1.5 MEUR, resulting in around 0.5 MEUR of unspent budget. Of this amount, roughly 0.3 MEUR is expected to be carried forward and used in 2026 to cover both activities initiated but not completed in 2025 or activities added in the Annual Work Programme 2026, while the remaining balance (around 0.2 MEUR) will be transferred to reserves. Together with the existing reserves, this will contribute to building a sufficiently robust financial buffer in view of ENNOH’s legal establishment foreseen for late 2026 or early 2027. This conservative budget execution supports financial stability and predictability during the transition phase.

The main expenditure categories in 2025 related primarily to staff costs, office rental and renovation works, external support services, governance and operational activities necessary for setting up ENNOH and delivering its core mandate. All major cost items remained within the levels initially foreseen in the approved budget. Budget lines that were only partially used or not used during 2025 were due to timing effects, operational phasing, or external dependencies.



13 Annex

List of abbreviations

ACER	Agency for the Cooperation of Energy Regulators	HTNO	Hydrogen Transmission Network Operator
AGEE	Ad-hoc Group on ENNOH Establishment	ILM	Interlinked Modelling
AWP	Annual Work Programme	ISO	International Organisation for Standardization
CBA	Cost-Benefit Analysis	LIO	Liaison Issuing Office
CE WG	Communication and Events Working Group	MENC WG	Market, Economics and Network Codes Working Group
CSEI	Copenhagen School of Energy Infrastructure	MEUR	Million euro
DG ENER	Directorate-General for Energy (European Commission)	NC	Network Code
ECH2A	European Clean Hydrogen Alliance	NSEC	North Seas Energy Cooperation
EC	European Commission	P&M WG	Planning and Modelling Working Group
EIB	European Investment Bank	PyPSA	Python for Power System Analysis
EIC	Energy Identification Code	R&D	Research and Development
ENNOH	European Network of Network Operators for Hydrogen	RPD WG	Regulatory & Policy Development Working Group
ENTSO-E	European Network of Transmission System Operators for Electricity	SNA	System Needs Assessment
ENTSOG	European Network of Transmission System Operators for Gas	SOT WG	System Operation & Transparency Working Group
EU	European Union	TEN-E	Trans-European Networks for Energy
EU DSO Entity	European Distribution System Operators Entity	TF	Task Force
FAG	Financial Advisory Group	ToR	Terms of Reference
FDR TF	Financing and De-risking Task Force	TYNDP	Ten-Year Network Development Plan
GA	General Assembly	UK	United Kingdom
H2	Hydrogen	WG	Working Group

Country Codes (ISO)

AL	Albania	LV	Latvia
AT	Austria	LY	Libya
AZ	Azerbaijan	MA	Morocco
BA	Bosnia and Herzegovina	ME	Montenegro
BE	Belgium	MK	North Macedonia
BG	Bulgaria	MT	Malta
BY	Belarus	NL	Netherlands, the
CH	Switzerland	NO	Norway
CY	Cyprus	PL	Poland
CZ	Czechia	PT	Portugal
DE	Germany	RO	Romania
DK	Denmark	RS	Serbia
DZ	Algeria	RU	Russia
EE	Estonia	SE	Sweden
ES	Spain	SI	Slovenia
FI	Finland	SK	Slovakia
FR	France	TM	Turkmenistan
GR	Greece	TN	Tunisia
HR	Croatia	TR	Turkiye
HU	Hungary	UA	Ukraine
IE	Ireland	UK	United Kingdom
IT	Italy		
LT	Lithuania		
LU	Luxembourg		

Imprint

Publisher:

European Network of Network Operators for Hydrogen (ENNOH)
Avenue de Cortenbergh 100
1000 Brussels, Belgium

ennoh.eu
info@ennoh.eu

Design:

DreiDreizehn GmbH, Berlin | 313.de

Pictures:

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Publication Date:

March 2026

