



Draft Annual Work Programme 2027

Proposal for Public Consultation

July 2026 (v1)

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Table of Contents

1. INTRODUCTION	2
2. SUBMIT YOUR RESPONSE	2
3. ENNOH IN 2026	3
4. GENERAL CONTEXT FOR 2027	4
5. ENNOH PRIORITIES FOR 2027	5
6. TASKS TO BE DELIVERED IN 2027	5
5.1. SYSTEM PLANNING AND MODELLING TASKS	6
5.2. MARKET, ECONOMICS AND NETWORK CODES.....	12
5.3. SYSTEM INTEROPERABILITY, TRANSPARENCY, IT AND DATA EXCHANGE	15
5.4. RDI, ENVIRONMENTAL, SECURITY AND REGIONAL COOPERATION.....	20
5.5. COMMUNICATION, EVENTS AND STAKEHOLDER ENGAGEMENT.....	23
5.6. REGULATORY AND POLICY DEVELOPMENT	24
5.7. CROSS-CUTTING INITIATIVES	26
5.8. ENNOH BUSINESS PLANNING AND ACTIVITIES REPORTING	28
7. PUBLIC CONSULTATIONS IN 2027	29
8. ENNOH FINANCING AND HR ASPECTS IN 2027	30
9. LIST OF ACRONYMS AND ABBREVIATIONS.....	30

1. Introduction

The Regulation (EU) 2024/1789 imposes a number of tasks and deliverables on ENNOH, which require intense preparatory work several months in advance of the given deadline.

The same Regulation also foresees a detailed process for the elaboration, consultation, and approval of the Annual Work Programme by ENNOH.

The Annual Work Programme 2027 sets out the main activities, priorities and deliverables that ENNOH intends to develop in 2027. It provides stakeholders with visibility on ENNOH's planned work, including in areas such as Union-level hydrogen network planning, market and network development, cooperation with other organisations, transparency, stakeholder engagement and the preparation of future regulatory and technical deliverables.

In 2027, ENNOH will continue reinforcing and scaling up its capacities to ensure full operational delivery under Regulation (EU) 2024/1789. The Annual Work Programme 2027 focuses on consolidating ENNOH's institutional capacity, assuming responsibility for Union-wide hydrogen network development planning, advancing the preparatory work for the technical and procedural foundations of the hydrogen network codes, strengthening cooperation with ACER, ENTSO-E, ENTSG and the EU DSO Entity, and providing transparent, evidence-based outputs to support the emergence of an integrated, secure and efficient internal hydrogen market.

2. Submit your response

This consultation is conducted in accordance with articles 59(1)(g) and 63(1) of the Regulation (EU) 2024/1789 and is based on ENNOH's Rules of Procedure for Consulting Stakeholders. Its purpose is to collect views, evidence and proposals from relevant stakeholders at an early stage, before the finalisation and adoption of the Annual Work Programme. ENNOH welcomes input from any interested parties.

Stakeholders are invited to comment on the proposed activities and deliverables, their relevance, prioritisation, expected added value and possible interactions with other ongoing EU-level processes. Contributions should be as specific as possible and, where relevant, refer to the relevant section or activity of the draft Annual Work Programme.

The consultation will remain open until **31 August 2026, 12:00 Brussels time / CEST**. Contributions should be submitted by filling in the following [online questionnaire](#). For questions or comments on the organisation of this public consultation, interested parties are invited to contact ENNOH by writing an e-mail to public.consultations@ennoh.eu.

Contributions should be sent in English and, in order to facilitate processing of the responses, the comments provided should clearly refer to the relevant sections or work packages included in this document.

We strongly encourage all stakeholders to submit their contributions as early as possible. ENNOH will not be able to take into account contributions received after the above-mentioned deadline.

All contributions received will be published on ENNOH's website, subject to confidentiality requests and applicable data protection rules. In case of a request for confidential information, such request should be clearly indicated and clearly stating which information is considered confidential.

Following the closure of this public consultation, ENNOH will assess all contributions received and prepare a revised version of the draft Annual Work Programme 2027.

ENNOH will also publish an Evaluation of Responses document, setting out how the feedback received during the consultation has been considered, indicating where comments have been reflected in the revised draft and providing reasons where observations have not been taken into account.

The revised draft Annual Work Programme 2027, together with the relevant information on the consultation process, will subsequently be submitted to the European Union Agency for the Cooperation of Energy Regulators (ACER) for its opinion, in accordance with Regulation (EU) 2024/1789.

3. ENNOH in 2026

In 2026, ENNOH is further consolidating its role as the European Network of (future) Hydrogen Network Operators and is moving from its initial establishment phase towards a more mature delivery phase. Building on the foundations created in 2025, ENNOH is focusing on the implementation of key regulatory tasks under Regulation (EU) 2024/1789, including the preparation of the Hydrogen Quality Monitoring Report, the development of the ENNOH Transparency Platform, the follow-up to the single-sector cost-benefit analysis methodology, and preparatory work related to future hydrogen network development planning. Particular attention is being given to the development of ENNOH's internal planning and modelling capabilities, including its contribution to the TYNDP 2026 process and the early preparation of the future TYNDP 2028 cycle.

A central priority in 2026 is ENNOH's work on financing and de-risking options for cross-border hydrogen infrastructure. In line with discussions at the Energy Infrastructure Forum, ENNOH is contributing to the assessment of possible approaches to support early hydrogen infrastructure investments in a nascent hydrogen market. This work is intended to support a better understanding of the regulatory, financial and market-related conditions needed to facilitate timely investment decisions, while maintaining consistency with the EU framework for hydrogen infrastructure planning and market development. ENNOH is now expected to contribute to further work on a possible implementation roadmap for de-risking investments on cross-border infrastructure, together with the European Commission, ACER, ENTSG, financial institutions and relevant stakeholders.

Throughout 2026, ENNOH is also strengthening its cooperation with ACER, the European Commission, ENTSG and ENTSO-E. This includes continued work on the interlinked modelling framework, preparatory work on future network codes, cooperation on repurposing-related guidance, and contributions to EU-level discussions on hydrogen infrastructure financing, market development, system integration and cross-sectoral infrastructure planning. ENNOH is also following and contributing, where relevant, to policy and regulatory developments of direct relevance to its mandate, including discussions

related to the EU Grids Package, the revision of the EU Hydrogen Strategy, the Energy Infrastructure Forum and the Hydrogen Regulatory Forum.

From an organisational perspective, 2026 is a year of further consolidation. ENNOH is continuing to expand its operational capacity, develop its internal working structure, strengthen stakeholder engagement and prepare the systems and processes needed to operate as a credible, transparent and effective European association. This includes work on internal rules and guidelines, public consultations, the organisation of ENNOH's first Annual Conference, external communication, cooperation with third-country operators and observers, and the progressive development of ENNOH's secretariat and internal processes. The activities and achievements of 2026 will be further detailed in the ENNOH Annual Report 2026, to be prepared and published in the first half of 2027.

4. General Context for 2027

In 2026, the EU hydrogen regulatory framework entered a decisive implementation phase. The deadline for the transposition of Directive (EU) 2024/1788 expires in August 2026, while Regulation (EU) 2024/1789 continued to provide the directly applicable framework for the development of the internal markets for renewable gas, natural gas and hydrogen. In parallel, the legislative process on the European Grids Package, including the proposed revision of the TEN-E Regulation, is expected to further reinforce the role of infrastructure planning, cross-sector coordination and timely investment delivery. These developments are expected to bring additional tasks and responsibilities for ENNOH, particularly in relation to hydrogen network planning, system needs identification, cost-benefit assessment and reinforced cooperation with ENTSO-E.

The broader EU energy policy context remained shaped by the need to accelerate renewable energy deployment, electrification and energy efficiency, while strengthening competitiveness, energy security and system resilience. At the same time, the increasing penetration of variable renewable electricity continued to highlight the need for flexibility solutions across different timeframes and energy vectors. In this context, hydrogen infrastructure is increasingly recognised as an important enabler of system integration, providing options for energy system flexibility, large-scale energy transport and storage capabilities, decarbonisation and resilience across sectors where direct electrification may be technically or economically constrained.

Looking towards 2027, the publication of the revised EU Hydrogen Strategy is expected ([link](#)) to provide renewed political impetus for the deployment of hydrogen markets and infrastructure across Europe. An increasing number of hydrogen projects are progressing towards final investment decisions, construction and early operation, creating a stronger need for predictable regulation, credible infrastructure planning, investment de-risking mechanisms and transparent market arrangements. Against this background, ENNOH's 2027 work will focus on consolidating its institutional capacity, assuming its hydrogen TYNDP responsibilities, and reinforcing its technical and regulatory workstreams to support the emergence of an integrated, efficient and resilient European hydrogen network.

5. ENNOH Priorities for 2027

1. Prepare and assume responsibility for Union-wide hydrogen network planning.

ENNOH will establish the processes, methodologies, data and IT architecture and cooperation arrangements required to assume responsibility for the hydrogen TYNDP, including scenario development, project collection, modelling, system needs assessment, infrastructure gap identification and preparation of the ENNOH hydrogen infrastructure map.

2. Advance hydrogen market and operational rule readiness.

ENNOH will develop its technical positions and preparatory work for hydrogen network codes, with particular attention to interoperability and data exchange, hydrogen quality, transparency, capacity and congestion management, balancing, tariffs and operational coordination.

3. Reinforce evidence-based policy support for investable hydrogen infrastructure.

ENNOH will provide technical and economic analysis on infrastructure de-risking, anticipatory investment, offshore hydrogen planning, cross-border interconnection needs and barriers to infrastructure delivery, while clearly distinguishing legal obligations from ENNOH policy recommendations.

4. Strengthen transparency, stakeholder engagement and public trust.

ENNOH will conduct early and open consultations, publish relevant documentation and feedback assessments, improve communication of its deliverables, and ensure that stakeholders can understand and contribute to ENNOH's work.

5. Consolidate ENNOH's institutional capacity.

ENNOH will reinforce its Secretariat, working-group processes, data-handling procedures, stakeholder-engagement framework and internal governance to ensure timely delivery of its statutory tasks and efficient cooperation with members, associated partners, observers, ACER, the Commission and other European network organisations.

6. Tasks to be delivered in 2027

The tasks to be delivered by ENNOH in 2027 can be grouped into different blocks according to their origin:

1. Tasks allocated by the Regulation (EU) 2024/1789
2. Tasks associated with existing or upcoming EU Policy and Regulatory Developments
3. Tasks started in 2026 to be continued in 2027
4. Tasks related to ENNOH Establishment and ENNOH's operations

Other unforeseen tasks may arise in 2027, including requests for information/assistance from ACER and the European Commission.

The following list details the tasks and responsibilities which, for readability, are grouped by themes according to the following distribution:

1. System Planning and Modelling
2. Market, Economics and Network Codes
3. System Interoperability, Transparency and Data Exchange
4. RDI, Environmental and Security
5. Communication, Events and Stakeholder Engagement
6. Regulatory and Policy Development
7. Cross-cutting Initiatives
8. ENNOH Business Planning and Activities Reporting

Unless specified otherwise, the different tasks and deliverables listed in the following sections are expected to be conducted during the whole year 2027.

5.1. System Planning and Modelling Tasks

5.1.1. TYNDP Scenarios 2028

Origin
Article 86 of the Regulation (EU) 2024/1789 amending the TEN-E Regulation (EU) 2022/869 Article 60 of Regulation (EU) 2024/1789 Article 6 of Regulation (EU) 2024/1789 Revised TEN-E Regulation (part of the EU Grids Package)
Objectives
Scenarios for the TYNDP 2028 will be a continuous task during 2027. They are expected to be delivered by the end of 2027 for a timely feed-in to the PCI/PMI process. The Scenarios for TYNDP 2026 show a delay up to 6 months in 2026, effectively shortening the TYNDP 2028 Scenario cycle to only 18 months (down from the 2-year usual cycle). This will require additional resources and coordination effort from ENNOH's side to work and deliver under the shortened process. The preparation of the Central Scenario, under the revised TEN-E Regulation, will also bring additional work for ENNOH since the planned entry into force of the new legal text is assumed to be Q1 2027. This means that the European Commission will start with the development of the Central Scenario and ENNOH will have to deliver data and be ready and capable of setting a good cooperation with the European Commission (EC-DG JRC) in this process.
Key Activities and Deliverables
- Scenarios TYNDP 2028 - Contribution to Central Scenario process to be developed by EC- DG JRC

5.1.2 TYNDP - Taking over H2 TYNDP Process from ENTSOG and preparing TYNDP 2028

Origin
Article 86 of the Regulation (EU) 2024/1789 amending the TEN-E Regulation (EU) 2022/869 Article 60 of Regulation (EU) 2024/1789 Article 61, paragraph 1, of the Regulation (EU) 2024/1789 Revised TEN-E Regulation (part of the EU Grids Package)
Objectives
According to Regulation (EU) 2024/1789, from 1 January 2027 on, ENNOH will take over from ENTSOG all the tasks related to the H2 TYNDP. From an institutional perspective, 2027 is the first year in which ENNOH assumes responsibility for the Union-wide hydrogen network development planning process, whereas the 2026 Hydrogen TYNDP will remain an ENTSOG deliverable produced under the transitional regime. For ENNOH's internal planning, the preparation of the 2028 Hydrogen TYNDP has already started in 2026 with the work on the scenarios and continues in 2027 with this task and other steps to be adopted in 2028. Concrete tasks to be delivered under this section are the following ones: Project Collection This task will be conducted for the first time by ENNOH and will fall under its responsibility. Preparatory work will include the development of Project Inclusion Guidelines. A Data Collection Platform will be set up. Preparation is expected to start in Q1 and Q2, while the peak workload will be during the actual collection exercise in Q3 and Q4. In 2027, ENNOH will need to establish the technical basis for conducting its first own hydrogen project collection exercise. This includes the use of a dedicated project collection tool, which will allow project promoters to submit the information required for the TYNDP 2028 process in a structured and transparent manner. The tool should support the collection of project data in line with the project inclusion guidelines, ensure consistency and completeness of submitted information, and facilitate the subsequent validation and assessment steps within ENNOH. The project collection exercise is planned for Q3 and Q4 2027. System Needs Methodology ENNOH will need to further develop its System Needs Methodology, to a level sufficiently robust to be able to engage effectively in future discussions with ACER on its Methodology. This work should build on ENNOH's own planning and modelling capabilities, as well as on the continued cooperation with ENTSO-E and ENTSOG under the roadmap of the progressively integrated and consistent framework report. By the

time discussions with ACER start in 2027, ENNOH should be sufficiently prepared to ensure that hydrogen-specific planning considerations are properly reflected in ACER's Methodology.

Continue Enhancing the PyPSA Integrated Model

By the end of 2026 ENNOH will have developed an initial PyPSA-based integrated model. For 2027, the work needs to continue in view of the TYNDP 2028. This work will include an exercise with a third-party provider to test the ENNOH model, identify gaps and areas for improvement and propose solutions.

System Needs Assessment

The System Needs Assessment is expected to start in 2027. This task will be of relevance especially from the second half of 2027 onwards.

Single-Sector CBA Methodology

ENNOH plans to finalise its CBA methodology in 2026. However, the revised TEN-E Regulation is expected to require stronger harmonisation between ENNOH's and ENTSO-E's CBA methodologies, in particular regarding the integration of electricity related aspects in hydrogen infrastructure assessment. Therefore, the work will need to continue in 2027 to further align both methodologies and to allow ENNOH to publish an updated and more harmonised version by the end of the year.

Cost of Disrupted Hydrogen

In addition, and following the suggestion received, ENNOH aims to carry out a study on the Cost of Disrupted Hydrogen. The outcome of this study will be used in the CBA workstream and included in the final ENNOH CBA methodology for the TYNDP 2028 process. This work is covered in a separate work package.

Key Activities and Deliverables

- Taking over H2 TYNDP process and Development of the TYNDP 2028 exercise
- Project Collection Exercise
- Project Collection Tool
- System Needs Methodology
- Continue enhancing PyPSA model
- System Needs Assessment
- Updated and final ENNOH's CBA methodology

5.1.3 Study on Cost of Disrupted Hydrogen (CODH)

Origin

ACER Opinion 08/2023 on ENTSG's draft CBA methodology for hydrogen

ACER Opinion 13/2025 on ENTSG's draft TYNDP 2024

Task started in 2026 to be continued in 2027

Objectives

In 2026, ENNOH published an interim single sector CBA Methodology. For the final Methodology to be used in the TYNDP 2028 process, ENNOH needs to further develop the treatment of the Cost of Disrupted Hydrogen (CODH).

ACER has repeatedly indicated that dedicated CODH values are needed for hydrogen infrastructure assessment and that using the Cost of Disrupted Gas as a proxy is not appropriate. ACER has also recommended that a dedicated study should be carried out to define a methodology for quantifying hydrogen disruption cost.

The objective of this work is to develop a transparent and robust approach for quantifying the economic value of disrupted hydrogen demand in the European energy system. The study should identify feasible CODH values at an appropriate level of granularity, considering the expected use of hydrogen across sectors, the role of hydrogen in industrial processes, substitution possibilities, flexibility, storage and the duration of disruption.

The outcome would support the finalisation of ENNOH's CBA methodology and the assessment of hydrogen infrastructure projects in the TYNDP 2028 cycle. Where final values cannot yet be determined with sufficient robustness, the study should propose interim values and sensitivity ranges.

Key Activities and Deliverables

- Preparation of the scope, tender documents and technical specifications for the CODH study
- Tendering and selection of an external service provider, where applicable
- Coordination of the study work, including exchanges with ACER, the European Commission and relevant stakeholders
- Assessment and validation of the study results, including proposed CODH methodology, values and sensitivity ranges
- Preparation of a CODH study report, including a CODH methodology, CODH values at a feasible level of granularity, and sensitivity ranges or interim values where needed
- Use of the study outcomes in the CBA workstream and inclusion of the CODH values in the final ENNOH CBA Methodology for the TYNDP 2028 process.

5.1.4 Offshore Hydrogen

Origin

Continuation of work initiated in 2026, including the follow up to the outlook and possible next steps identified in the ENNOH Offshore Hydrogen Report.

Cooperation with ENTSO-E on the Offshore Network Development Plan (ONDP), which may gain further relevance under Article 15 of the revised TEN-E Regulation¹.

Objectives

In May 2026, ENNOH established an Offshore Hydrogen Task Force and approved the preparation of an ENNOH report on offshore hydrogen networks, to be completed before the end of 2026. Building on the outlook of this report, ENNOH aims to continue following up on the identified topic areas and possible next steps in 2027.

In 2024, the Energy Infrastructure Forum invited ENTSO-E to enhance its collaboration with ENNOH, ENTSG and all relevant stakeholders in the development of offshore plans.

This cooperation gains additional relevance under the on-going revision of the TEN-E Regulation. ENNOH will follow the outcome of the TEN-E revision and assess its implications for ENNOH's role in offshore hydrogen planning.

For 2027, ENNOH will continue working on offshore hydrogen planning together with interested members and in cooperation with key stakeholders such as HyNOs, OTC and other relevant offshore planning initiatives. ENNOH will also continue its active involvement in the NSEC initiative and contribute to ensuring that hydrogen related aspects are appropriately reflected in offshore planning discussions.

Key Activities and Deliverables

- Further development of ENNOH's position and vision on Offshore Hydrogen Planning, including follow up on the topic areas and possible next steps identified in the outlook of the Offshore Hydrogen report
- Close cooperation with HyNOs, OTC, NSEC and relevant key stakeholders and initiatives
- Cooperation with ENTSO-E and further involvement in the ONDP process according to the outcome of the revised TEN-E Regulation.

5.1.5 IT Architecture Deployment Roadmap

Origin

Article 86 of the Regulation (EU) 2024/1789 amending the TEN-E Regulation (EU) 2022/869

Article 60 of Regulation (EU) 2024/1789

Article 61, paragraph 1, of the Regulation (EU) 2024/1789

Revised TEN-E Regulation (part of the EU Grids Package)

¹ At the moment of launching this public consultation, the revision of the TEN-E Regulation is under discussion between Parliament and Council, with the final text expected by the end of 2026.

Objectives
The objective is to prepare an ENNOH IT Architecture Deployment Roadmap setting out the technical, functional and governance requirements for ENNOH's internal digital and data architecture. This roadmap should support ENNOH's progressive assumption of regulatory and operational tasks, in particular the hydrogen TYNDP, project collection, scenario development, modelling, system needs assessment, cost-benefit assessment, transparency obligations, REMIT readiness and stakeholder-facing digital tools. The roadmap should define the architecture required to connect ENNOH's core digital tools and datasets, including a central data warehouse, the project collection tool, the PS-CBA tool, modelling tools, the Transparency Platform, REMIT II-related reporting interfaces, the ENNOH website, visualisation dashboard, the ENNOH Infrastructure Map and other internal data-management or publication tools. This activity should ensure that ENNOH's future IT architecture is scalable, secure, cost-efficient and fit to deliver the regulatory tasks. It should also support data consistency, traceability, quality control, cybersecurity, access rights, interoperability between tools and efficient publication of relevant information to stakeholders, while avoiding duplication of systems and unnecessary manual data handling. The roadmap should be prepared in close cooperation between the SPM Area, the SOTSI Area, the IT Manager and relevant ENNOH units, and should provide the basis for future Board decisions on IT investments, procurement and implementation priorities.
Key Activities and Deliverables
- Preparation of the ENNOH IT Architecture Deployment Roadmap, in cooperation with the SPM Area, the IT Manager and the SOTSI Area. - Investment proposal to be presented to the Board.

5.1.6 Interlinked Modelling Framework

Origin
- Follow-up of the ILM Report prescribed by Article 86 of the Regulation (EU) 2024/1789 amending the TEN-E Regulation (EU) 2022/869 - 4th ENNOH Board Strategy Session - Grids Package – Revised TEN-E Regulation
Objectives
According to Regulation (EU) 2024/1789, the ENNOH, ENTSO-E and ENTSG were required to jointly submit to the European Commission and ACER by 31 October 2025 a progressively integrated and consistent framework for electricity, natural gas and hydrogen infrastructure planning (commonly known as Inter-linked Market Model, or ILM).

This work established a common process through which the three associations could compare, align and progressively connect their respective modelling approaches.

The framework covered electricity, natural gas and hydrogen transmission infrastructure, as well as storage, LNG and electrolyzers. The report delivered in 2025 assessed how interlinkages were reflected in TYNDP related deliverables, including scenarios, system needs assessments and cost benefit analyses.

The report also included a roadmap structuring further cooperation between the three associations, including topics, objectives and possible next steps. Building on this roadmap and the work progressed in 2026, the cooperation is expected to continue in 2027, with particular attention to system needs assessment and the further alignment of planning approaches across the three sectors.

In parallel, ENNOH will prepare for expected future discussions on system needs assessment under the revised TEN-E framework, in particular in view of the methodology to be developed by ACER. Continued exchange with ENTSO-E and ENTSG can help ensure that hydrogen-specific planning considerations are adequately reflected in those discussions

Key Activities and Deliverables

- Implementation of the objectives and next steps identified in the roadmap of the progressively integrated and consistent framework report
- Continued cooperation between ENNOH, ENTSO-E and ENTSG to foster further harmonisation of planning approaches across electricity, natural gas and hydrogen
- Preparation of ENNOH's contribution to future discussions on the ACER Methodology for System Needs Assessment.

5.2. Market, Economics and Network Codes

5.2.1 EU De-Risking Mechanism

Origin

In May 2026, the Energy Infrastructure Forum welcomed the joint report of ENNOH and ENTSG on de-risking Europe's future hydrogen infrastructure, including the concept of an EU guarantee.

On this basis, the Forum invited a continued structured exchange in order to explore further potential solutions to de-risking cross-border hydrogen infrastructure and towards a possible Implementation Roadmap to support the ramp-up of hydrogen networks with consideration of value added and a system perspective. This work shall be steered by the European Commission in close cooperation with ACER, ENNOH, ENTSG and with the involvement of all relevant stakeholders and, as relevant, financial institutions. The outcomes are to be presented as soon as available.

Objectives

Based on the conclusions from the last Energy Infrastructure Forum (May 2026), ENNOH will continue to provide technical and economic input to the Commission-led structured exchange on possible de-risking options for cross-border hydrogen infrastructure. Depending on the outcome of the legislative process regarding the revision of the TEN-E Regulation, ENNOH will work accordingly to develop a solution which allows this EU mechanism, supported by an EU guarantee, to be activated and operationalised as soon as possible.

Moreover, ENNOH will start to work in cooperation with GIE / H2eart for Europe in a similar exercise to evaluate the de-risking needs (revenues gap, size of the amortisation account and size of the guarantee) of hydrogen storage operators. The justification for this joint work is that the future European Hydrogen Transmission system will need a number of storage facilities to be functional. Hydrogen storage is essential to provide the balancing needs of the future European transmission system and to provide the power system with abundant and cost-efficient flexibility and storage which is needed.

Key Activities and Deliverables

- Detailed proposal on De-Risking Mechanism for cross-border hydrogen infrastructure to be supported by an EU guarantee, and a Roadmap for its implementation and operationalisation.
- De-risking work for storage facilities, in cooperation with GIE/H2eart for Europe, following the experience gained in the de-risking work for hydrogen transmission networks.

5.2.2 Network Codes

Origin

Based on Article 72 of the Regulation (EU) 2024/1789, ENNOH started in 2026 to work on preparatory groundwork for Hydrogen network codes. With the completion of the milestones in 2026, and in view of the upcoming ENNOH legal foundation and adoption of the first priority list by the Commission, ENNOH should continue and intensify its preparatory work on Network Codes.

Objectives

ENNOH's mission is to promote harmonised market rules while developing the hydrogen market, avoiding market fragmentation as Member States develop national arrangements, in a non-coordinated manner, during the early phase of the hydrogen market. To achieve this ENNOH will continue and intensify preparatory work on Network Codes during 2027 including:

- Monitoring the rules put in place at national level in the different Member States to inspire HTNOs that have not developed them yet and to check possible inconsistency that could materialise in issues at cross-border Interconnection points.

- To proactively develop positions on future hydrogen network codes, as internal technical ENNOH documents. The aim is to develop and agree among ENNOH members, on ideas and proposals to fill the most relevant Network Codes, and to test them with market players during workshops as part of the preparatory work on network codes. This work will be done, keeping ACER and the EU Commission informed, and in continuous exchange with them.

Key Activities and Deliverables

- Monitoring and assessment of market rules put in place at national level.
- Development of internal positions on future hydrogen network codes, at internal level, to develop ENNOH position on a number of key priority network codes, and to test them with the key market stakeholders as part of the ENNOH's preparatory work, and without prejudging the formal process under Regulation (EU) 2024/1789.
- Cooperation with ACER and European Commission on this workstream.

5.2.3 Electricity Flexibility Market Design

Origin

ENNOH should know and be involved in electricity developments which are relevant for the hydrogen sector, especially those having an impact on hydrogen infrastructure, including electrolyzers.

Regarding electricity network codes, the Demand Connection Network Code revision and a new Demand Response Network Code lay on the Commission table for adoption. These network codes will bring relevant implications for the electrolyzers and, consequently, for the hydrogen infrastructure business. This is also relevant given that, according to regulation, the Member States have to assess their electricity flexibility needs.

Objectives

ENNOH will work to gain deeper understanding in the electricity market design. ENNOH will contribute to any EU regulatory/legislative developments impacting electrolyzers or hydrogen transmission infrastructure.

ENNOH will assess the implications of electricity network code developments for electrolyzers connected to hydrogen networks, including technical connection requirements, flexibility services, cross-vector coordination and their relevance for hydrogen infrastructure planning.

Key Activities and Deliverables

- Assessment and in-depth analysis of the Electricity Market Design and relevant electricity network codes.

- Coordination, via the ENNOH RPD WG, with other key associations and interested stakeholders to ensure a right and fair regulatory treatment for electrolyzers connected to hydrogen networks.

5.2.4 Renewable and Low-Carbon Hydrogen Certification

Origin
Two EU Delegated Acts described the criteria for hydrogen to be recognised either as RFNBO or low carbon. This certification and the way to use it (e.g. registration via the Union Database – UDB) is essential to create trust in the new EU hydrogen market. Furthermore, HTNOs will have to participate concretely in this certification mechanism, at least by providing metering information about injection points.
Objectives
ENNOH will aim to gain a robust understanding of the certification mechanisms for renewable and low-carbon hydrogen and acquiring this knowledge will generate synergies with other ENNOH tasks, such as the preparatory work on network codes. ENNOH will assess the operational implications of renewable and low-carbon hydrogen certification mechanisms for hydrogen network operators, with a focus on transparency, practicability, data exchange and consistency with market development. Moreover, ENNOH will work, always within the scope of its mission and mandates, for facilitating the improvement of the current model.
Key Activities and Deliverables
- Assessment and in-depth analysis of the hydrogen certification market design. - Coordination, via the ENNOH RPD WG, with other associations and interested stakeholders to promote the right framework and certification mechanisms for renewable and low-carbon hydrogen.

5.3. System Interoperability, Transparency, IT and Data Exchange

5.3.1 Development of the most essential and most needed elements of the future Network Code on Interoperability

Origin
Based on Article 72 of the Regulation (EU) 2024/1789, ENNOH started in 2026 to work on preparatory groundwork for Hydrogen network codes. With the completion of the milestones in 2026, and in view of the upcoming ENNOH legal foundation and adoption of the first priority list by the Commission, ENNOH aims to continue and intensify its work on Network Codes.

With the adoption of the Hydrogen Quality Monitoring Report, ENNOH agreed on the need to prioritise the establishment of general principles needed for interconnection agreements governing data exchange, hydrogen quality and flow control.

Objectives

ENNOH mission is to promote harmonised market rules while developing the hydrogen market, avoiding market fragmentation among those Member States who define their respective rules in a non-coordinated manner. To achieve this, ENNOH will continue and intensify preparatory work on Network Codes during 2027 including:

- Monitoring of all the interoperability and data exchange rules put in place at national level in the different Member States to inspire HTNOs that have not developed them yet and to check possible inconsistency that could materialise in issues at cross-border Interconnection points.
- To proactively develop provisions most urgently needed (i.e. not all the provisions described in the Regulation under the Interoperability Network Code, but the most needed at this stage of market development) which should be part of the future network code on interoperability. This document will be developed as an internal ENNOH document. The aim is to develop and agree among ENNOH members, on ideas and proposals to fill the most urgently needed elements of the Network Code, and to test them with market players during workshops, as part of the ENNOH Preparatory work on Network Codes. This work will be done while keeping ACER and the EU Commission informed, and in continuous exchange with them.

Key Activities and Deliverables

- Monitoring and assessment of interoperability and data exchange rules put in place at national level.
- Development, at internal level, of initial and most needed provisions which should be part of a future Interoperability and Data Exchange Network Code, and to test them with the key market stakeholders.
- Cooperation with ACER and European Commission on this subject as far as possible.

5.3.2 Hydrogen Quality Monitoring Report (preparation of 2nd edition)

Origin

Following the task given by Article 59, paragraph 1(j), of the Regulation (EU) 2024/1789, ENNOH adopted its first Hydrogen Quality Monitoring Report in May 2026.

This first report was dedicated to collecting information and intelligence on the ongoing developments related to hydrogen quality (technical studies, national regulations, industry recommendations, etc.), to prepare an overall vision of the state-of-the-art, and to issue a number of recommendations agreed by all the ENNOH members. ENNOH also

started technical cooperation in this field with the European Commission, ACER, CEN/CENELEC, EASEE-gas, storage operators, fuel cell manufacturers, etc., on this topic.

The Regulation (EU) 2024/1789 foresees that ENNOH will publish this Hydrogen Quality Monitoring Report every two years. The next edition will have to be published in May 2028. The preparation of the report will start in Q3-Q4 2027.

Moreover, in the first ENNOH Hydrogen Quality Report, ENNOH agreed and recommended:

- To start monitoring Hydrogen quality data as soon as possible
- To launch a European standardisation work relating to hydrogen quality to be developed by CEN-CENELEC

Objectives

To fulfil the recommendations agreed by ENNOH in May 2026, and to start preparing the second edition of ENNOH's Hydrogen Quality Monitoring Report, ENNOH team will work in the following aspects during 2027:

- Monitor and incorporate Hydrogen quality data into the Transparency Platform, so that the second edition of the Report will be based on reliable operational data.
- Start working on the second edition of the Hydrogen Quality Monitoring Report in Q3-Q4 2027, so that the second edition brings quantitative and qualitative enhancements where needed. These enhancements include modelling exercises, economic and cost-benefit analyses, simulations, and/or other quantitative actions that might be considered appropriate.

Key Activities and Deliverables

- Monitoring and collection of Hydrogen quality data to be displayed at the ENNOH Transparency Platform
- Start preparation of the second edition of the Hydrogen Quality Report in Q3-Q4 2027, which will include quantitative and qualitative enhancements compared to the first edition.
- Cooperate closely with CEN-CENELEC on any standardisation mandate for Hydrogen Quality or any other action on their side related to Hydrogen Quality.
- Cooperation with EASEE-gas, CHP, H2eart for Europe, GIE and other relevant key stakeholders on Hydrogen quality.

5.3.3 ENNOH Transparency Platform 2.0

Origin

Based on Annex I, paragraph 4, subparagraph 4.1 (h) of the Regulation (EU) 2024/1789, ENNOH will establish in 2026 a central, web-based platform for making relevant data available to market participants.

This Union-wide central transparency platform is to be deployed on a cost-efficient basis by October 2026. Given the early stage of development of the EU hydrogen market and the limited amount of operational data available at that stage, the initial version focused on publicly available information on hydrogen transmission projects (including corridors), based on the projects listed in the TYNDP 2026, and on the creation of a scalable Platform architecture. In addition, a section of the Platform contains information on all the hydrogen transmission network operators, with links to their respective websites.

The Platform to be built in 2026 will include tools and functionalities that can be further expanded as the European hydrogen infrastructure and market develop. The Transparency Platform will also offer direct access to a specific tool to collect the projects for the following TYNDP processes (2028, etc.), which will be conducted by ENNOH.

For 2027, ENNOH will aim to take the Platform to the next level (Transparency Platform 2.0) by adding additional functionalities and datasets, improving data quality and usability, and preparing the Platform to support future transparency, interoperability and market integration requirements.

Objectives

ENNOH's objective is to ensure that the Transparency Platform becomes the single Union-wide reference point for hydrogen network transparency information, supporting effective, non-discriminatory and transparent access to the European hydrogen network.

In 2027, ENNOH will focus on:

- ensuring the stable operation, maintenance and continuous improvement of the Transparency Platform following its initial deployment in 2026;
- expanding the scope, datasets, quality and usability of the information made available through the Platform, in line with the development of the EU hydrogen infrastructure market and the transparency requirements under Regulation (EU) 2024/1789;
- using the Platform as a practical tool to support ENNOH's wider work on transparency, interoperability, data exchange, hydrogen quality monitoring and future network code preparation; and
- collecting feedback from HTNOs, market participants, ACER, the European Commission and relevant stakeholders to guide the further development of the Platform; in particular the Platform will also include a direct link to a section dedicated to the hydrogen projects collected from the promoters in the frame of the H2 TYNDP 2028 and the following ones.

Key Activities and Deliverables

- Monitoring and maintenance of the Transparency Platform, ensuring stable operation, accessibility, usability and continuous improvement throughout 2027.
- Collection and assessment of stakeholder feedback, which will lead to an internal improvement roadmap for the next phase of the Platform.

- Implementation of Transparency Platform 2.0 enhancements, including additional datasets, improved functionalities and visualisation tools, downloadable information and user guidance where technically feasible and legally appropriate.

5.3.4 Preparation for REMIT obligations in 2028

Origin
Regulation (EU) 1227/2011 on wholesale energy market integrity and transparency, as amended by Regulation (EU) 2024/1106, Commission Delegated Regulation (EU) 2026/255 on the authorisation and supervision of inside information platforms and registered reporting mechanisms, and Commission Implementing Regulation (EU) 2026/256 on data reporting.
Objectives
After the amendment of the REMIT Regulation in 2024, the hydrogen-related supply, storage and transportation contracts are expected to become subject to reporting obligations under the revised REMIT framework, subject to the applicable implementing rules and ACER guidance. The REMIT Implementing Regulation on data reporting entered into force in April 2026. ACER is expected to publish its Guidance on reporting hydrogen contracts 18 months later (i.e. 29 October 2027). The REMIT regulation applies to hydrogen transactions made from 1st July 2028. The first hydrogen-related reporting will have to be submitted to ACER by 31st January 2029. This initial reporting will collect and transmit data for the period July-December 2028. To fulfil these deadlines, preparatory work needs to be done by ENNOH and its members, especially if ENNOH is to become an RRM and the ENNOH Transparency Platform to become an IIP. This preparatory work will be more intense during the Q3-Q4 2027 and afterwards, in view of being authorised, tested and approved as RRM and IIP before July 2028. During 2026, ENNOH has been participating as active stakeholder in the ACER's Stakeholder Activities for AEMPs. This work will continue also during 2027. ACER plans to publish implementation guidelines in October 2027 and ENNOH will follow and participate in the process.
Key Activities and Deliverables
- Monitoring of REMIT II implementation and ACER guidance, including participation in relevant ACER stakeholder activities, the involvement in ACER implementation guidelines and regular assessment of the implications for hydrogen transportation contracts. - Assessment of ENNOH's potential role as a Registered Reporting Mechanism (RRM), including legal, governance, technical, IT, cybersecurity, data protection, cost and liability implications, leading to a Board decision on whether ENNOH

should proceed with an RRM application. ENNOH RRM status would allow to report data to ACER on behalf of HTNOs.

- Assessment of ENNOH's Transparency Platform future role as an Inside Information Platform (IIP) which reports on information which could influence the market.
- Preparation of a REMIT readiness roadmap for ENNOH and its members including an indicative implementation timeline ahead of the expected hydrogen reporting obligations in late 2028

5.3.5 Other aspects: EIC/LIO, Cybersecurity and Data Protection

Origin
Activities initiated according to the Annual Work Programme 2026, which have legal basis in the Regulation (EU) 2024/1789. Article 59, paragraph 1 (k), of the Regulation (EU) 2024/1789.
Objectives
The establishment of ENNOH as a Local Issuing Office (LIO) for hydrogen will require a number of technical, legal and functional developments including the legal establishment of ENNOH, a specific portal and protocols to be published on ENNOH's website and to be updated regularly, and continuous cooperation with ENTSO-E (CIO) and other national/regional LIOs. Regarding Cybersecurity and Data protection, ENNOH is expected to promote these aspects in cooperation with relevant authorities and regulated entities. This task is not associated with any deadline or to any request from the Commission or ACER and therefore remains optional for 2026 and 2027. Nevertheless, and in order to progressively enter this topic, ENNOH joined the joint cybersecurity working group set up by ENTSG, GIE and other associations at the end of 2026. By doing this, ENNOH will be able to start gaining experience and expertise in this field. Concrete activities and deliverables could be decided during 2027.
Key Activities and Deliverables
- Preparation and, when feasible, implementation of ENNOH's role as Local Issuing Office (LIO) for hydrogen following the ENNOH's legal establishment. - Participation in the joint cybersecurity working group with ENTSG, GIE and other associations, with a view to identifying possible ENNOH follow-up actions or deliverables for 2028.

5.4. RDI, Environmental, Security and Regional Cooperation

5.4.1 Research, Development and Innovation Activities

Origin
Article 59, paragraph 4, of the Regulation (EU) 2024/1789 requires ENNOH to include a list of research and development activities in its Annual Work Programme.
Objectives
In 2026 ENNOH started a number of activities in the field of Research, Development and Innovation (RDI). These include starting the cooperation with the Clean Hydrogen Partnership (CHP) and joining the CHP's Stakeholders Panel, or the cooperation with ENTSO-E on their RDI Implementation Roadmap. In 2027, ENNOH will continue to structure its RDI work around topics directly relevant to HTNOs. ENNOH will focus on strengthening cooperation with relevant RDI and technical stakeholders, including the CHP, the European Hydrogen Observatory, ENTSO-E, GERG, the European Commission, ACER, JRC, standardisation bodies and other relevant sector organisations. ENNOH will also aim to develop an initial RDI Roadmap, in cooperation with ENNOH members, identifying research gaps, potential cooperation areas and topics to be considered in future Annual Work Programmes. The objective will be to identify relevant research gaps, avoid duplication of work, and ensure that ENNOH's regulatory and technical deliverables are supported by an appropriate evidence base.
Key Activities and Deliverables
- Monitoring and mapping of relevant RDI initiatives, technical studies and innovation projects relevant to hydrogen transmission infrastructure. - Continue and strengthen the structured cooperation with key RDI and technical stakeholders, including CHP/EHO, GERG, JRC, ACER, the European Commission, standardisation bodies and relevant sector organisations. - Preparation of an internal ENNOH RDI Roadmap during 2027. This Roadmap will also include a specific chapter for RDI activities related to the System Planning and Modelling Area.

5.4.2 Continue work on Hydrogen Emissions/leaks

Origin
Article 59, paragraph 1 (l), of the Regulation (EU) 2024/1789
Objectives
ENNOH is expected to develop and promote best practices in the detection, monitoring and reduction of hydrogen leaks. Although this task is not linked to a specific regulatory deadline or to a specific request from the European Commission or ACER, it is a

permanent task under Regulation (EU) 2024/1789 and should therefore be developed progressively.

Following the knowledge-gathering work and stakeholder exchanges initiated in 2026, ENNOH will continue in 2027 to build a technical and evidence-based understanding of hydrogen leak detection, monitoring and mitigation practices. The work should remain proportionate to the current maturity of the European hydrogen infrastructure market, while preparing the basis for future ENNOH best practices.

The 2027 work should focus on consolidating available knowledge, identifying operational and regulatory gaps, engaging with technical experts and stakeholders, and defining a realistic roadmap towards future ENNOH best practices.

Key Activities and Deliverables

- Monitoring of technical, regulatory and scientific developments on hydrogen leak detection, monitoring and reduction, including relevant studies, standards, industry practices and stakeholder positions.
- Follow-up to the 2026 stakeholder work, including targeted technical exchanges with HTNOs, CHP, research organisations, standardisation bodies, NGOs, ACER, the European Commission and relevant industry stakeholders.
- Preparation of an ENNOH Roadmap towards future best practices on hydrogen leaks, identifying priority topics, data needs, possible methodologies and next steps for 2028 and beyond.

5.4.3 Regional Cooperation

Origin

Article 65 of Regulation (EU) 2024/1789

Objectives

Regulation (EU) 2024/1789 requires hydrogen transmission network operators to establish regional cooperation within ENNOH in order to contribute to ENNOH's statutory tasks. HTNOs are also expected to promote operational arrangements ensuring the optimum management of the network and the interoperability of the interconnected Union hydrogen system, thereby facilitating commercial and operational cooperation between adjacent HTNOs.

Building on the initial Board discussions and preparatory work carried out in 2026, ENNOH will in 2027 define a practical framework for regional cooperation. This framework should support the progressive development of cross-border operational coordination, identify regional issues relevant for infrastructure planning and interoperability, and ensure that regional cooperation contributes effectively to ENNOH's Union-wide tasks.

The approach should remain proportionate to the maturity of the hydrogen market and infrastructure.

Key Activities and Deliverables
- Definition of an ENNOH framework for regional cooperation, including proposed regional configurations, governance arrangements, scope of activities and possible deliverables. - Recommendations for the further development of Regional Cooperation in 2028.

5.5. Communication, Events and Stakeholder Engagement

5.5.1 Continuation and Strengthening of Stakeholder Engagement and External Communication

Origin
ENNOH Statutory documents, including Rules of Procedure for Consulting Stakeholders
Objectives
In 2027, ENNOH will further strengthen its engagement with stakeholders and enhance its external visibility as the European reference organisation for hydrogen transmission network operators. Building on the principles set out in ENNOH's statutory documents and Rules of Procedure, ENNOH will aim to communicate its work in a clear, transparent and accessible manner. Particular attention will be given to increasing the visibility of ENNOH's main deliverables, the work of its Areas and Working Groups, the activities of its members, and the role of the Board and Secretariat in supporting the development of a European hydrogen infrastructure and market. ENNOH will also use its communication channels to provide facts, figures and evidence-based messages on hydrogen infrastructure, including through the ENNOH Map and other public-facing tools.
Key Activities and Deliverables
- Continue social media and external communication actions, to provide visibility on ENNOH deliverables, activities of ENNOH members, Board-level messages and selected institutional milestones. - Publication and dissemination of ENNOH's activities and recommendations in press and relevant media. - Preparation of an Annual Event, which may include a ENNOH's founding ceremony if ENNOH's legal establishment has been completed. - ENNOH to continue regular exchanges with the European Commission, ACER, CINEA and key associations and stakeholders, such as ENTSO-E, ENTSG, the EU-DSO entity, Hydrogen Europe, ECH2A, and representatives from the producers and off-takers.

- Organisation of exchanges and meetings in the framework of the Advisory Panel for hydrogen-related Infrastructure Operators.

5.5.2 Informing External Audience about ENNOH's Work

Origin
Article 59, paragraph 3 of the Regulation 2024/1789 prescribes that ENNOH shall provide the public with regular information on its decision-making and activities.
Objectives
In 2026 ENNOH has been communicating externally on its activities (e.g. workshops, webinars, publications, etc.) using the different available communication channels (website, social media, newsletters, ...). ENNOH has published the minutes from the General Assembly and Board meetings as obliged by the Regulation (EU) 2024/1789. These minutes provide to interested parties detailed information about ENNOH's decision-making. Apart from the regular communication activities on ENNOH's main activities and decision-making, for 2027 it is proposed to add an additional communication activity which will enable a two-way communication with interested stakeholders. ENNOH will aim to organise a public workshop in Q1-Q2 2027 to present and discuss with stakeholders the content of the Annual Work Programme 2027 as well as the activities and deliverables done in 2026, which are part of the ENNOH's Annual Report 2026.
Key Activities and Deliverables
Continuing communications activities and events to keep interested third parties regularly informed about ENNOH's decision-making and activities. Organising a Stakeholder workshop in Q1-Q2 2027 to present and discuss the AWP27 and the Annual Report 2026.

5.6. Regulatory and Policy Development

5.6.1 Regulatory and Policy Monitoring, and Reaction to the Relevant Developments

Origin
ENNOH Statutory documents, ENNOH's Mission
Objectives

In 2027, ENNOH will continue monitoring relevant EU regulatory and policy developments affecting hydrogen transmission infrastructure, hydrogen market development and ENNOH's statutory tasks.

Where relevant, ENNOH will prepare technical input, responses to public consultations, position papers, suggested amendments, or any other type of proposals for Board consideration.

ENNOH will continue providing frequent regulatory and policy updates to the ENNOH members.

Key Activities and Deliverables

- Monitoring of relevant EU regulatory and policy developments, with regular updates to ENNOH members and relevant internal bodies.
- Preparation of proposals where appropriate, including possible public consultation responses, position papers, amendments, technical notes or targeted institutional exchanges.

ENNOH will cooperate with key stakeholders to fulfil ENNOH's missions and promote hydrogen cross-border trade across the EU. In this sense, and within its statutory mandate, ENNOH may provide technical input, evidence-based analysis and institutional feedback on EU regulatory and policy developments relevant to hydrogen transmission infrastructure and market integration.

As specified in other parts of this Annual Work Programme, this involves work on specific topics such as energy system integration, decarbonisation, electricity market design and the certification market design of renewable and low-carbon hydrogen.

5.6.2 EU Commission Fora and Other Institutional Meetings

Origin
ENNOH's Statutory Documents (incl. ENNOH's Mission) and invitations received from the European Commission to participate
Objectives
ENNOH will participate in the EU official Fora where it is invited, including the Rotterdam Forum (H ₂), the Madrid Forum (Gas), the Florence Forum (Electricity) and the Copenhagen Energy Infrastructure Forum (Infrastructure, Financing and Planning) or the EU Sustainable Energy Week.
Moreover, during 2027 there might be other conferences, fora, workshops or external events, which might be organised by EU institutions or key stakeholders, where major policy and regulatory developments are discussed, and where it is advisable that ENNOH presents its views.
Key Activities and Deliverables

Participation in relevant EU-level fora and institutional meetings, including the Rotterdam Forum, Madrid Forum, Florence Forum, the Copenhagen Energy Infrastructure Forum and other relevant conferences, fora, workshops or external events.

5.6.3 European Clean Hydrogen Alliance

Origin
Invitation by European Commission (DG GROW)
Objectives
Following an invitation from the European Commission (DG GROW) in 2025, ENNOH has been acting as the facilitating organisation/secretariat support of one of the Roundtables within the revamped European Clean Hydrogen Alliance (ECH2A). Established in 2020 after the publication of the EU Hydrogen Strategy, ECH2A is led by the Commission and brings together over 1,800 members, including multiple TSOs and hydrogen network operators. The Alliance was revamped in 2026 with a stronger role for DG ENER and DG CLIMA, a streamlined structure, ministerial meetings, and a focus on project promoters and results-driven initiatives. ENNOH coordinates the Transmission, Distribution & Storage Roundtable by providing secretariat support. In 2026 a 2-year Work Programme for the Roundtable was approved, and ENNOH will continue implementing this work programme during 2027, in cooperation with the European Commission, the Roundtable members, the other members of the Alliance and interested parties.
Key Activities and Deliverables
Act as facilitating organisation (i.e. secretariat) to the Transmission & Storage Roundtable in coordination with the European Commission (DG GROW). Implementation of the 2026-2027 Roundtable Work Programme, including workstreams on financing / de-risking, regulatory environment and coordination across the hydrogen value chain.

5.7. Cross-cutting Initiatives

5.7.1 Advisory Panel on Hydrogen Infrastructure Operators – Recommendations Report

Origin
Annual Work Programme 2026
Objectives

In 2026 the ENNOH General Assembly decided, as part of the Annual Work Programme 2026, to set up an *Advisory Panel for Hydrogen-related Infrastructure Operators*, mainly hydrogen storage operators, HDNOs, Hydrogen terminal operators, and Ports.

This Advisory Panel is to be launched in the second half of 2026, and it enables ENNOH to exchange information directly with these operators, gaining a deeper understanding of their activities, fostering increased cooperation, and tapping into synergies.

For 2027, it is proposed to continue these exchanges and invite the Advisory Panel to elaborate a document with a number of recommendations on how ENNOH and the other hydrogen-related infrastructure operators should work together, and how these recommendations could contribute to inform ENNOH's future work.

Key Activities and Deliverables

Continuation of structured exchanges with the Advisory Panel for hydrogen-related Infrastructure Operators.

Collection and consolidation of recommendations from Advisory Panel participants, focusing on interfaces with hydrogen transmission infrastructure, infrastructure planning, modelling, data exchange, interoperability, operational coordination, market development and possible synergies with ENNOH's workstreams.

Preparation of an Advisory Panel Recommendations Report, summarising the main findings and proposed follow-up actions for ENNOH, including possible contributions to future Annual Work Programmes, stakeholder engagement activities and cooperation formats.

5.7.2 International Cooperation with (non-EU) Third-Country Operators

Origin

ENNOH Statutory documents, including Article 26 of ENNOH Rules of Procedure, and relevant Board/General Assembly decisions.

Objectives

In 2027, ENNOH will continue developing a structured and transparent framework for cooperation with hydrogen network operators based in third countries, in accordance with ENNOH's statutory documents and Rules of Procedure.

The objective is to enable technical and regulatory exchanges with selected third-country operators where such cooperation may support the development of cross-border hydrogen infrastructure, interoperability, market integration and security of supply, while fully safeguarding ENNOH's governance, confidentiality rules, the interests of the European Union and the secure operation of the future EU hydrogen network.

Cooperation with third-country operators should remain based on clearly defined bilateral cooperation frameworks, approved through the relevant ENNOH governance

processes, and in line with the bilateral agreement signed between ENNOH and the third country operators.

Key Activities and Deliverables

Structured dialogue for cooperation with third-country hydrogen network operators based in Switzerland, according to the cooperation agreement signed by both parties in summer 2026.

For 2027, the cooperation with the network operators based in Switzerland should focus on exchanging views and experience related to general aspects of

- hydrogen regulation, including existing and future hydrogen market design rules, in the EU and in Switzerland
- general aspects of network planning (e.g. projected capacities at IPs) and interoperability aspects at IPs.

Preparation and, where appropriate, conclusion of bilateral cooperation agreement with UK operators.

If requested by third-country operators not based in UK or Switzerland, ENNOH could start negotiations and, where appropriate, prepare and conclude bilateral cooperation agreements with other operators.

5.8. ENNOH Business Planning and Activities Reporting

5.8.1 Annual Work Programme 2028

Origin
Article 59, paragraph 1(g), Article 59, paragraph 4, Article 63 and Article 64 of the Regulation (EU) 2024/1789 Article 32 of ENNOH Rules of Procedure
Objectives
ENNOH will prepare, consult, submit to ACER and publish its Annual Work Programme 2028 in accordance with Regulation (EU) 2024/1789 and ENNOH's Rules of Procedure. The Annual Work Programme 2028 will define ENNOH's planned tasks, deliverables, consultation processes and indicative calendar for 2028, including network code preparation, coordination of hydrogen network operation, research and development activities and other statutory or strategic workstreams. The preparation of the Annual Work Programme 2028 will build on the experience gained with the 2026 and 2027 Annual Work Programmes and will consider the progressive consolidation of ENNOH's role in hydrogen network planning, market-rule preparation, transparency, interoperability, system operation and stakeholder engagement.

Before adoption by the General Assembly, ENNOH will organise a public stakeholder consultation for at least two months, update the draft based on the feedback received, submit the revised version to ACER for its opinion, and take ACER's opinion and recommendations duly into account before finalisation.

Key Activities and Deliverables

Preparation of the draft Annual Work Programme 2028, to be submitted for public consultation. ENNOH will assess the stakeholder feedback received and will prepare an Evaluation of Responses document indicating how the feedback received has been taken into account in preparing the revised version of the Annual Work Programme.

The revised version of the AWP28 will be submitted to ACER for its opinion. The draft AWP28 will be amended taking into account ACER's feedback and will be adopted by ENNOH General Assembly in December 2027.

5.8.2 Annual Report 2026

Origin

Article 59, paragraph 1(h), and Article 59, paragraph 2, of Regulation (EU) 2024/1789

Objectives

ENNOH will prepare and publish its Annual Report 2026, covering the main activities, achievements, governance developments and deliverables completed during 2026. The report will provide a transparent account of ENNOH's work including progress on regulatory tasks, stakeholder engagement, cooperation with European institutions and relevant sector organisations, and the development of ENNOH's internal capabilities.

The Annual Report 2026 should also reflect the level of completion of the different tasks envisaged in the Annual Work Programme 2026.

Key Activities and Deliverables

Preparation, adoption and publication of the Annual Report 2026, ensuring a clear, factual and transparent presentation of ENNOH's 2026 achievements and progress made.

7. Public Consultations in 2027

Based on the information listed in Section 3, ENNOH foresees launching at least three public consultations in 2027.

Concept	Date
Annual Work Programme 2028	July 2027
ENNOH's System Needs Methodology	Q3-Q4 2027

Consultation on harmonised ENTSO-E/ENNOH Single - Sector CBA Methodology	Q3-Q4 2027
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Table 1: Public Consultations to be launched in 2027

8. ENNOH Financing and HR Aspects in 2027

As ENNOH continues its organisational development, particular attention will be given in 2027 to maintaining a workforce with the expertise and capacity required to deliver its expanding regulatory responsibilities.

By the end of 2026, a total of 15 FTEs will be part of the ENNOH Team. In view of the tasks to be developed in 2027, a further increase in the number of FTEs is necessary in order to deliver according to the expectations of the members, ACER, the European Commission, and interested stakeholders.

This process involves a new recruitment plan to continue expanding the ENNOH team. To deliver the tasks set out in this Annual Work Programme 2027, ENNOH will continue to strengthen its Secretariat, internal expertise and operational processes, subject to the relevant governance and budgetary approvals. The System Planning and Modelling area within ENNOH will welcome a large majority of the new staff members planned for 2027.

ENNOH will continue to foster an international, collaborative and multidisciplinary working environment, making effective use of secondments from hydrogen transmission network operators and specialised external expertise where appropriate, while promoting continuous professional development and efficient resource allocation across all business areas.

9. List of acronyms and Abbreviations

ACER: European Union Agency for the Cooperation of Energy Regulators.

AEMP / AEMPs: Association(s) of Energy Market Participants. Used in the context of ACER stakeholder activities on REMIT implementation.

AWP: Annual Work Programme.

AWP27: Annual Work Programme 2027.

CBA: Cost-Benefit Analysis.

CEN: European Committee for Standardization.

CENELEC: European Committee for Electrotechnical Standardization.

CEN-CENELEC: Joint reference to CEN and CENELEC.

HyNOS: Hydrogen Networks of the Northern Seas

IIP: Inside Information Platform(s).

H2eart for Europe: Industry initiative focused on underground hydrogen storage.

HDNO / HDNOs: Hydrogen Distribution Network Operator(s).

HR: Human Resources.

HTNO / HTNOs: Hydrogen Transmission Network Operator(s).

ILM: Interlinked Modelling Framework / Inter-linked Market Model.

IP / IPs: Interconnection Point(s).

IT: Information Technology.

CEST / CET: Central European Summer Time / Central European Time.

CHP: Clean Hydrogen Partnership. Recommendation

CINEA: European Climate, Infrastructure and Environment Executive Agency.

CIO: Central Issuing Office. Used in the context of EIC/LIO cooperation.

CODH: Cost of Disrupted Hydrogen.

DG ENER: Directorate-General for Energy of the European Commission.

DG GROW: Directorate-General for Internal Market, Industry, Entrepreneurship and SMEs of the European Commission.

DG CLIMA: Directorate-General for Climate Action of the European Commission.

DSO: Distribution System Operator.

EASEE-gas: European Association for the Streamlining of Energy Exchange – gas.

EC: European Commission.

ECH2A: European Clean Hydrogen Alliance.

EHO: European Hydrogen Observatory.

EIC: Energy Identification Code.

ENNOH: European Network of Network Operators for Hydrogen.

ENTSO-E: European Network of Transmission System Operators for Electricity.

ENTSOG: European Network of Transmission System Operators for Gas.

EU: European Union.

EU DSO Entity: European Union Distribution System Operators Entity.

FTE: Full-Time Equivalent(s).

GERG: European Gas Research Group.

GIE: Gas Infrastructure Europe.

JRC: Joint Research Centre of the European Commission.

LIO: Local Issuing Office.

LNG: Liquefied Natural Gas.

NGO: Non-Governmental Organisation.

NSEC: North Seas Energy Cooperation.

ONDP: Offshore Network Development Plan.

OTC: Offshore Transmission Coordinator.

PC: Public Consultation.

PCI: Project of Common Interest.

PMI: Project of Mutual Interest.

PS-CBA: Project-Specific Cost-Benefit Analysis.

PyPSA: Python for Power System Analysis.

RDI: Research, Development and Innovation.

REMIT: Regulation on Wholesale Energy Market Integrity and Transparency.

REMIT II: The revised REMIT framework following the amendment introduced by Regulation (EU) 2024/1106.

RFNBO: Renewable Fuel of Non-Biological Origin.

RPD WG: Regulatory and Policy Development Working Group.

RRM: Registered Reporting Mechanism(s).

SOTSI: System Operation, Transparency and System Interoperability.

SPM: System Planning and Modelling.

TEN-E: Trans-European Networks for Energy.

TSO: Transmission System Operator(s).

TYNDP: Ten-Year Network Development Plan.

UDB: Union Database.

UK: United Kingdom.

WG: Working Group.

