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WORKING DOCUMENT

From: General Secretariat of the Council
To: Working Party on Energy

N° prev. doc.: 11521/22

Subject: Proposal for a COUNCIL REGULATION on coordinated demand reduction measures for gas
- Comments from Member States

Delegations will find, attached, comments from SWEDEN on the above mentioned subject.

Sweden's written comments on the Council regulation on coordinated demand reduction measures for gas

Overall comments on the proposal

Sweden welcomes EU coordinated measures for reductions in gas consumption, whilst underlining that national differences should be taken into consideration. Measures should be focused to where the effect is greatest and the particularities of small and specialised gas markets should be observed.

Article 3 and 8

Sweden is sceptical to the increased administrative burden involved in reporting voluntary consumption reduction measures to the Commission as often as every two months. The attention must be on whether gas use is reduced, not what measures have or have not been taken.

Article 4

Sweden favours an increase in MS's influence on when a union crisis is declared. The declaration of a union crisis means significant interventions in MS's energy policy, which is why it is important that MS has as much control as possible over the instrument.

Article 5.2

It is important that the focus in the regulation is on the reduction of gas use, not on which measures have been implemented nationally. Reductions caused by the market (through, e.g., high prices) should not have to be linked to particular measures taken by MS in order to be counted. If a MS did not implement measures but still achieved sufficient reductions, this must also be acceptable as reductions in gas use. Also, non-measures should be able to be taken into account, such as **not** compensating companies and households economically for high gas prices, thus letting the price incentives have full effect.

Article 6.1

Sweden believes that market-based measures must include letting the market take its course, if gas use thereby decreases. High gas prices and security of supply awareness will likely lead to reductions in gas consumption.

Article 6.3

Sweden believes it is important that measures that promote fuel switching from gas should not include subsidies for fossil fuels or result in investments in coal or oil with lock-in effects.

Article 8.1

Sweden considers it should be sufficient that *gas use* (not measures taken) is reported to demonstrate reduced use, at least if a sufficient gas reduction can be demonstrated. Increased

administrative burden takes up the same resources nationally at the competent authority that could otherwise focus on reducing the gas consumption.

Article 8.2

Sweden has doubts about the additional administrative burdens for MS that the article introduces. The purpose of having the Commission assess MS individual plans for action at national level is unclear.

Article 9

Sweden supports a two-year application period for the regulation, and the time period should not be extended, especially not until further notice.