

Ready4H2 Response to EC Heating/Cooling Strategy Public Consultation

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Ready4H2 members (distribution system operators or gas utilities operating over half of Europe's gas grids across 10 European countries) support the EU's climate objectives and the decarbonisation of the heating sector. They are committed to making their grids ready for all energy gases - renewable and low carbon gases, including biomethane, hydrogen and synthetic methane - to ensure continued sure supply of energy and to assist the EU meet its climate targets. Ready4H2 supports the submissions made by its partners GD4S, Marcogaz and Eurogas to this consultation.

The current *Heating and Cooling Strategy* **focuses on electric heat pumps and district heating networks only**, pursuing an all-electric approach and a one-technology approach where power plants are to produce electricity centrally and extract the waste heat in winter as district heating and where district heating is not feasible, a heat pump is to be installed.

This raises concerns. Firstly it is unclear which renewable energy will power the plants and secondly it **excludes the essential role of gas grids** that deliver gas to millions of households and businesses. These grids have been designed to meet industrial and transportation demand plus seasonal heating demand for buildings during the harshest cold snaps, **typically several times the total electric infrastructure capacity** and 5-10 times cheaper for a given capacity.

While electric heat pumps and district heating network solutions are valid, the energy savings benefits, particularly attributed to electric heat pumps, are often overestimated. To **avoid energy poverty**, realistic and comprehensive cost-benefit analyses are essential, including direct costs to end users but also indirect system costs, such as investments in electricity grids updates, generation and storage capacity, and the construction and operation of district heating networks. Renewable and low-carbon gases delivered through the gas grids will be **more cost-effective, efficient and quicker to implement** in comparison to switching to electricity. Refer to the Ready4H2 Phase 3 Report on www.ready4h2.com. See also Opinion C/2025/4210 of the European Economic and Social Committee "Towards a Balanced European Energy System" regarding the **immediate benefits and represent scalable decarbonisation opportunities** from renewable gases and DG ENER news articles 9 October 2025 "5 things you should know about biogas and biomethane" and 14 October 2025 "In Focus: Hydrogen and DG ENER news article" where Europe's energy security is reinforced by biomethane and hydrogen.

Decarbonising energy should be assessed using a **technology-neutral approach** to ensure solutions are selected for their actual supply-chain carbon footprint, security of supply, system resilience and overall efficiency. This is in line with the EPBD in Articles 11 and 17 (5); **fair treatment of all energy sources with due respect to the principle of technological neutrality**. Examples include: high-efficiency boilers fuelled by renewable gases replacing old, more inefficient appliances; hybrid heat pumps combining boiler and electric heat pump to offer flexibility and higher system efficiency; and gas heat pumps being suitable for high-energy demand buildings, micro-cogeneration and fuel cells for local heat and electricity production.

Consumer choice should be preserved, allowing homeowners the freedom to choose their equipment and energy use, tailored to their specific needs and financial conditions.