



Keys to an F-Gas Regulation for climate-neutral power grids

Adequate provisions for the transition to new technologies

 50Hertz Transmission GmbH	 Amprion GmbH	 Austrian Power Grid AG	 Bundesverband der Energie- und Wasserwirtschaft e.V.	 Elia Transmission Belgium	 EnBW Energie Baden-Württemberg AG	 E.ON	 Netze BW GmbH	 Österreichs E-Wirtschaft
 Rheinische NETZGesellschaft mbH (RNG)	 Stadtwerke München GmbH	 TenneT	 Transnet BW GmbH	 Vattenfall	 Verband kommunaler Unternehmen e.V.	 Verband kommunaler Unternehmen Österreichs	 Wiener Stadtwerke GmbH	

Power industry at the heart of successful energy transition



The power industry fully embraces the EU's climate and energy policy objectives. We contribute towards these objectives by **accelerating the energy transition for a power system based on renewable energy sources (RES)**. We are likewise committed to transitioning to a sustainable management and operation of our assets. In this vein, we strongly support the European Commission's aim to phase out SF₆-based technologies after a transition period for the different voltage levels. **Already today, we are committed to using up to 100 percent F-gas-free applications when available.**

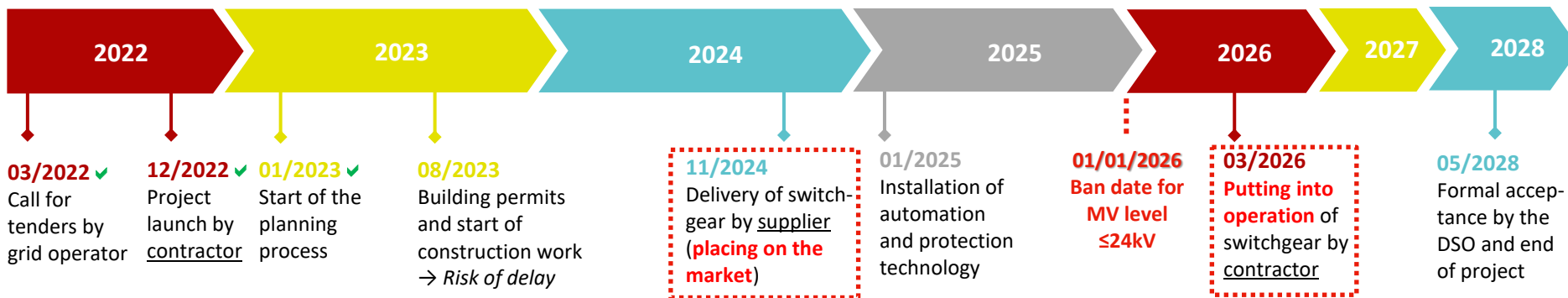


Electrical switchgear installations are core components of the electrical grid and as such indispensable for a 24/7 secure electricity transmission and distribution. **Given the progressing energy transition, the need for switchgear grows rapidly.** Unless there is a sufficient supply of products that meet the new requirements, **it is important to be allowed to install available switchgear and to operate it over its whole technical lifespan.** Otherwise, the urgently needed grid expansion will be counteracted and the energy transition jeopardised. Therefore, it is important that the new F-gas Regulation provides **adequate provisions for the transition period.**



Already in the current market situation, the planning, approval and construction processes of the electrical installations take long time because of longsome delivery dates of all components, lengthy permitting procedures, and shortage of skilled workforce. **The change from “placing on the market”, as envisaged in the European Commission's proposal or the European Parliament's report, to “putting into operation” (Art. 13(5)) in the Council's General Approach would be critical, as it would significantly shorten the transitional period until the ban date and even endanger projects which have already been started.**

Comparison of "placing on the market" and "putting into operation" based on a practical example – HV/MV substation with SF₆ MV switchgear



As the above example shows, **even projects where planning process is already ongoing and electrical switchgear has been ordered can be subject of the ban** if “putting into operation” wording is in the regulation.

Even long after the delivery of the switchgear to the grid operator, delays can occur that are not in the grid operator’s control, e.g. delay in the delivery of other parts (control units etc.), species protection, or force majeure (e.g. flooding of the building).

This example is not singular and **given the current market environment, the total project timespan is constantly increasing.**



Timeline example and picture: HV/MV substation with SF₆ MV switchgear, South Germany

Solution: support for the Council proposal, but use of ‘placing on the market’ instead

In order to avoid risks and to achieve planning security and legal certainty particularly for the transition period of the upcoming years, it is important to link the ban dates in the F-gas Regulation to the placing on the market rather than the putting into operation of the switchgear.

	Commission	Parliament	Council	Proposed wording
Art. 3.6	(6) ‘placing on the market’ means the supplying or making available to another person within the Union, for the first time, for payment or free of charge, the customs release for free circulation in the Union, and the use of substances produced or the use of products or equipment manufactured for own use;	(6) ‘placing on the market’ means the supplying or making available to another person within the Union, for the first time, for payment or free of charge, the customs release for free circulation in the Union, and the use of substances produced or the use utilisation of products or equipment manufactured for own use utilisation ;	(6) ‘placing on the market’ means the customs release for free circulation in the Union or the supplying or making available to another person within the Union, for the first time, for payment or free of charge, the customs release for free circulation in the Union, and or the use of substances produced or the use of products or equipment manufactured for own use;	(6) ‘placing on the market’ means the customs release for free circulation in the Union or the supplying or making available to another person within the Union, for the first time, for payment or free of charge, the customs release for free circulation in the Union, and or the use of substances produced or the use of products or equipment manufactured for own use;
Annex IV 23)/ Art. 13(5) (Council)	Annex IV (23) Installation and replacement of the following electrical switchgear: (a) medium voltage switchgear for primary and secondary distribution up to 24 kV, with insulating or breaking medium using, or whose functioning relies upon, gases with GWP of 10 or more, or with GWP of 2000 or more, unless evidence is provided that no suitable alternative is available based on technical grounds within the lower GWP ranges referred to above; – Date of prohibition: 1 January 2026 (b) ...	Annex IV (23) Installation and replacement of the following electrical switchgear: (a) medium voltage switchgear for primary and secondary distribution up to and including 24 kV, with insulating or breaking medium using, or whose functioning relies upon, fluorinated greenhouse gases; - 1 January 2026 (b) ...	Art. 13.5 Putting into operation of the following new or expanded electrical switchgear with fluorinated greenhouse gases is prohibited as follows: (a) as of 1 January 2026 medium voltage switchgear for primary and secondary distribution up to 24 kV, with insulating or breaking medium with GWP of 10 or more; (b) ...	Art. 13.5 Placing on the market of the following new or expanded electrical switchgear with fluorinated greenhouse gases is prohibited as follows: (a) as of 1 January 2026 medium voltage switchgear for primary and secondary distribution up to 24 kV, with insulating or breaking medium with GWP of 10 or more; (b) ...

Thank you for your consideration.

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