



Brussels, 1.12.2025  
C(2025) 8144 final

**COMMISSION DELEGATED REGULATION (EU) .../...**

**of 1.12.2025**

**amending Regulation (EU) 2022/869 of the European Parliament and of the Council, as regards the Union list of projects of common interest and projects of mutual interest**

## **EXPLANATORY MEMORANDUM**

### **1. CONTEXT OF THE DELEGATED ACT**

#### **Objective and legal basis of the proposed action**

This Delegated Regulation establishes the second Union list of projects of common interest (PCIs) and projects of mutual interest (PMIs) in line with Regulation (EU) 2022/869 of the European Parliament and of the Council of 30 May 2022 on guidelines for trans-European energy infrastructure<sup>1</sup> (the TEN-E Regulation).

PCIs are key energy infrastructure projects that are critical for completing the European internal energy market. They contribute to ensuring climate change mitigation and, in particular, to achieving the Union's 2030 targets for energy and climate and its climate neutrality objective by 2050 at the latest. PCIs also contribute to ensuring interconnections, energy security, market and system integration and competition that benefits all Member States, as well as making energy prices more affordable.

PMIs are key energy infrastructure projects that are promoted by the Union in cooperation with third countries.

Article 3(4) of the TEN-E Regulation requires the Commission to adopt, every two years, a delegated act that establishes a Union list of PCIs and PMIs. The Union list is based on the regional lists of candidate PCIs/PMIs prepared and adopted by the regional groups established by the TEN-E Regulation.

This Delegated Regulation takes the form of an annex to the TEN-E Regulation.

Once this Delegated Regulation is in force, Delegated Regulation (EU) 2024/1041<sup>2</sup>, containing the first Union list of PCIs and PMIs, will be repealed and will cease to have effect.

#### **General context of the Delegated Regulation**

The TEN-E Regulation sets up a legislative framework which aims at energy infrastructure planning for the selection of PCIs and PMIs and at facilitating and accelerating the implementation process of PCIs and PMIs.

The TEN-E Regulation establishes 11 strategic geographical infrastructure priority corridors in the areas of electricity, offshore grids, hydrogen and electrolysers and three Union-wide infrastructure priority thematic areas for smart electricity grids, smart gas grids and cross-border carbon dioxide network. It provides for an open, transparent and inclusive process for identifying not only specific PCIs that are needed to implement these priority corridors and

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<sup>1</sup> Regulation (EU) 2022/869 of the European Parliament and of the Council of 30 May 2022 on guidelines for trans-European energy infrastructure, amending Regulations (EC) No 715/2009, (EU) 2019/942 and (EU) 2019/943 and Directives 2009/73/EC and (EU) 2019/944, and repealing Regulation (EU) No 347/2013, (OJ L 152, 3.6.2022, p. 45)

<sup>2</sup> Commission Delegated Regulation (EU) 2024/1041 of 28 November 2023 amending Regulation (EU) 2022/869 of the European Parliament and of the Council as regards the Union list of projects of common interest and projects of mutual interest, (OJ L 2024/1041, 8.4.2024, ELI: [http://data.europa.eu/eli/reg\\_del/2024/1041/oj](http://data.europa.eu/eli/reg_del/2024/1041/oj))

areas but also specific PMIs that the Union develops with third countries and that contribute to the Union's 2030 targets for energy and climate and its 2050 climate neutrality objective.

The TEN-E Regulation also lays down a set of measures to ensure that PCIs and PMIs are implemented timely, including:

- strengthened transparency and improved public consultation;
- accelerated and streamlined permit granting procedure, including a binding three-and-a-half-years' time limit for this procedure;
- a single national competent authority acting as a one-stop-shop for permit granting procedures;
- a single point of contact for offshore renewable grids;
- improved regulatory treatment by allocating costs across borders according to the net benefits, and regulatory incentives; and
- eligibility of applying for financial assistance under Connecting Europe Facility (CEF) in the form of grants.

## **2. CONSULTATIONS PRIOR TO THE ADOPTION OF THE ACT**

### **Process prior to the adoption of the Union list**

The process of establishing the Union list started in September 2024 and ends with the entry into force of this Delegated Regulation.

The identification process of PCIs and PMIs is based on regional cooperation and it was managed by the regional groups. Regional groups for electricity, offshore grids, hydrogen and electrolysers comprise representatives of the Member States, national regulatory authorities (NRAs), transmission system operators (TSOs), European Networks of Transmission System Operators for gas and electricity (ENTSOG and ENTSO-E), the Agency for the Cooperation of Energy Regulators (ACER), the EU DSO Entity and the Commission. Regional groups for smart gas grids, smart electricity grids and carbon dioxide networks comprise representatives of the Member States, project promoters and the Commission.

In addition to the legal provisions of the TEN-E Regulation on the specific role of Regional Groups in establishing the regional lists of PCIs and PMIs, the Commission acted on political commitments stemming from the Interinstitutional Agreement between the European Parliament, the Council of the European Union and the European Commission on Better Law-Making and the Framework Agreement on relations between the European Parliament and the European Commission. The meetings of regional groups have been open to officials working for the Council and Parliament's administrations and information related to the preparation of this Delegated Act have been shared on the official webpage of the European Commission.

The PCI/PMI process also involved exchanges with relevant stakeholders in the field of energy, such as environmental protection organisations. Furthermore, the Commission carried out six open public consultations to obtain the views of stakeholders and the general public on the necessity and merits of the proposed projects from the perspective of Union energy policy.

The process of establishing the Union list consisted of the following main stages:

- (a) The identification of the infrastructure needs and the improved assessment methodology

The PCI/PMI selection process in the electricity, offshore grids and hydrogen sectors started in September 2024 with the identification at regional level of specific infrastructure needs that cannot be effectively resolved by other non-infrastructure means, including regulatory or market-based measures, and that can be addressed by building new infrastructure.

The electricity infrastructure needs identified by the regional groups constituted the basis of the improved assessment methodologies of electricity PCI and PMI candidates. The needs methodologies were first developed within a cooperation platform comprising representatives of the Commission, ACER, ENTSOG and ENTSO-E as well as representatives of NRAs on an ad-hoc basis. The cooperation platform was established to ensure better coordination of the PCI/PMI process between key participants, and to provide for greater transparency. They were then discussed and approved within the relevant regional groups.

The second PCI/PMI selection process for hydrogen and electrolyser infrastructure projects took place against a backdrop of significant uncertainties of information on current and future supply (European or imports from outside the EU) and demand of hydrogen. The needs methodology agreed by the regional groups strove to ensure that hydrogen infrastructure needs lead to the selection of PCI or PMI projects responding to future hydrogen demand and supply in 2040 and which are essential for the European Union energy and climate objectives.

Data on the current or projected demand and supply of renewable hydrogen was collected mainly from Member States and was further corroborated using data from the European Network of Transmission and System Operators (ENTSOE), in cases where Member State input was not available.

(b) The submission of candidate PCIs and PMIs by project promoters

In accordance with point 2(3) and 2(4) of Annex III to the TEN-E Regulation, electricity, offshore grids and hydrogen infrastructure projects submitted by promoters during the dedicated calls as candidate PCIs and PMIs are required to be part of the 10-year network development plans (TYNDPs) for gas and electricity developed by ENTSOG and ENTSO-E respectively.

(c) The assessment of candidate PCIs and PMIs by the regional groups

Each regional group carried out an assessment of the candidate PCIs proposed for its priority corridor and of each of the candidate PMIs pertaining to the respective category and region.

In the first place, projects were assessed with regard to their compliance with the general criteria laid down in Articles 4(1) and 4(2) of the TEN-E Regulation, including, their cross-border dimension, as well as their contribution to the objectives of the corridor. Secondly, the candidate projects considered eligible were all assessed against the sustainability criterion mandatory for all project categories in line with the TEN-E Regulation. Only the projects that demonstrated significant contributions to sustainability were further assessed in the PCI/PMI process.

Furthermore, electricity and offshore grids and hydrogen candidate PCIs and PMIs were subject to cost-benefit analysis carried out according to the methodologies developed by ENTSO-E and ENTSOG respectively.

Subsequently, the regional groups assessed projects' contributions to the specific criteria laid down in Article 4(3) of the TEN-E Regulation according to the dedicated methodologies developed within the cooperation platform and agreed by the respective regional groups (for electricity, offshore grids, hydrogen and electrolyser PCI/PMI candidates).

Considering the European hydrogen market's early stage of development and the limited data available on the supply and potential off-takers of renewable hydrogen, the assessment

methodologies for candidate hydrogen and electrolyser projects included high-level principles developed and agreed upon by the regional groups. These principles complemented the criteria in Article 4, further strengthening the decision-making in line with the infrastructure needs and EU's policy objectives.

In the priority thematic areas of smart electricity grids, smart gas grids and cross-border carbon dioxide networks, the cost-benefit analysis was prepared by the promoters following the respective methodologies<sup>3</sup> referred to in Article 11 of the TEN-E Regulation. Subsequently, the application for PCI/PMI status was assessed in accordance with the assessment framework agreed within the respective thematic areas.

(d) Consultation of stakeholders on candidate PCIs

The provisions of Annex III to the TEN-E Regulation make the PCI/PMI process more transparent and enable the public to participate in the process. Each regional group must consult the organisations representing the relevant stakeholders and, where appropriate, they can consult the stakeholders directly. Stakeholders include third country representatives, producers, distribution system operators, suppliers, consumers, and organisations for environmental protection. The regional group can also organise hearings or consultations, where relevant for the accomplishment of its tasks.

To comply with the Commission's better-regulation principle, six public consultations on candidate PCIs and PMIs for electricity/offshore grids, hydrogen and electrolyser, smart electricity grids, smart gas grids and cross-border carbon dioxide networks were carried out between 31 January 2025 and 25 April 2025. Overall, more than 1300 submissions were received for all project categories. Replies were submitted via the EU Survey consultation platform representing a wide range of citizens and stakeholders, including environmental organisations, trade associations, small and medium enterprises (SMEs), etc. The main goal of the consultation process was to assess the necessity of the proposed projects – taking account of their socioeconomic benefits and costs - from the Union energy policy perspective. All replies to the consultation were uploaded to the Commission's dedicated online repository for meetings (CIRCABC)<sup>4</sup>.

Moreover, stakeholders could follow, online, the meetings in which the regional groups discussed the needs in each corridor, assessed the PCI/PMIs candidates and drew up the regional lists of PCIs/PMIs.

(e) The NRAs' check of the criteria and the cross-border relevance

The NRAs (coordinated by ACER) cross-checked the consistent application of the criteria/cost-benefit analysis methodology and their cross-border relevance for candidate PCIs and PMIs falling within their competency. Overall, the NRAs assessment was positive and only some NRAs expressed their reservations about a few projects. Detailed findings were submitted to the regional groups for their consideration.

(f) The agreement of the decision-making bodies on the draft regional lists of candidate PCIs and PMIs

Following the assessment of candidate PCIs/PMIs by the regional groups, their decision-making bodies at technical level (composed of the representatives of the Commission and Member States) agreed on the draft regional lists and the ranking of candidate PCIs/PMIs.

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<sup>3</sup> The final CBA methodologies can be found here: [TEN-E Regional Group Meetings - Library \(europa.eu\)](#)

<sup>4</sup> [TEN-E Regional Group Meetings - Library \(europa.eu\)](#)

Meetings of the technical decision-making bodies of the regional groups were held on 24 June 2025 for all project categories.

(g) ACER's opinions on the draft regional lists

In line with point 2(14) of Annex III to the TEN-E Regulation, ACER provided its opinion on 30 September 2025 on the *draft* regional lists of projects falling under the competence of national regulatory authorities. ACER assessed the consistent application of the assessment criteria and of the cost/benefit analysis across the regions.

(h) The adoption of the final regional lists of PCIs and PMIs by the decision-making bodies

The *final* regional lists for the 11 relevant priority corridors, for all three priority thematic areas, and for PMIs were adopted by the decision-making bodies of the regional groups on 24 October 2025. The decision-making bodies adopted the final regional lists on the basis of the draft regional lists and after considering ACER's opinion, the NRAs' assessments and, in the case of projects not falling within the NRAs' remit, the Commission's assessment.

The inclusion of the projects in the Union list has no bearing on the application of State aid rules in the case of State support for the projects.

### **3. LEGAL ELEMENTS OF THE DELEGATED ACT**

#### **Summary of the proposed action**

This Delegated Regulation identifies 235 PCIs/PMIs which are deemed necessary to implement the priority corridors for electricity, offshore grids, hydrogen and electrolysers and the priority thematic areas (smart electricity grids, smart gas grids and the cross-border carbon-dioxide networks, as identified in the TEN-E Regulation), or respectively, where the Union is developing projects in cooperation with third countries contribute to the Union's 2030 targets for energy and climate and its 2050 climate neutrality objective.

This Delegated Regulation is adopted pursuant to Article 3(4) of the TEN-E Regulation, which empowers the Commission to adopt, every two years, a delegated act establishing the Union list of PCIs and PMIs. This is the second Union list under the TEN-E Regulation and once it enters into force, Delegated Regulation (EU) 2024/1041, containing the first Union list of PCIs and PMIs will be repealed and will cease to have effect.

This Union list provides for 235 PCIs/PMIs, including 88 in electricity, 19 in offshore grids, 100 in hydrogen and electrolysers, 6 smart electricity grids, 3 smart gas grids, 17 cross-border carbon dioxide network projects and 2 Art. 24 derogation projects.

The Union list includes projects that are critical for completing the European internal energy market. These projects contribute to ensuring climate change mitigation and, in particular, to achieving the Union's 2030 targets for energy and climate and its climate neutrality objective by 2050 at the latest. They also help to ensure interconnections, energy security, market and system integration and competition that benefits all Member States, as well as making energy prices more affordable.

The establishment of the Union list has no bearing on any additional assessments to be carried out under the Treaty on the Functioning of the European Union ('TFEU') and on the obligations stemming from it and from secondary legislation. Thus, the assessment has no bearing on the application of EU competition rules, and it does not constitute clearance under EU State aid rules. It should be noted that Member States are responsible under Article 108(3) TFEU for notifying the Commission about any plans to grant State aid.

The PCIs/PMIs included in this Delegated Regulation are to be implemented only after the successful completion of permit granting procedures in all the countries concerned, including environmental impact assessments and public consultations. The PCIs/PMIs need to comply with Union and national legislation (including environmental legislation), as applicable, and, where relevant, with the unbundling provisions in Directive (EU) 2019/944<sup>5</sup> and in Directive 2009/73/EC<sup>6</sup>.

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<sup>5</sup> Directive (EU) 2019/944 of the European Parliament and of the Council of 5 June 2019 on common rules for the internal market for electricity and amending Directive 2012/27/EU OJ L 158, 14.6.2019, p. 125).

<sup>6</sup> Directive 2009/73/EC of the European Parliament and of the Council of 13 July 2009 concerning common rules for the internal market in natural gas and repealing Directive 2003/55/EC (OJ L 211, 14.8.2009, p.94).

## COMMISSION DELEGATED REGULATION (EU) .../...

of 1.12.2025

**amending Regulation (EU) 2022/869 of the European Parliament and of the Council, as regards the Union list of projects of common interest and projects of mutual interest**

THE EUROPEAN COMMISSION,

Having regard to the Treaty on the Functioning of the European Union,

Having regard to Regulation (EU) 2022/869 of the European Parliament and of the Council of 30 May 2022 on guidelines for trans-European energy infrastructure, amending Regulations (EC) No 715/2009, (EU) 2019/942 and (EU) 2019/943 and Directives 2009/73/EC and (EU) 2019/944, and repealing Regulation (EU) No 347/2013<sup>7</sup>, and in particular Article 3(4) thereof,

Whereas:

- (1) Regulation (EU) 2022/869 sets up a framework for identifying, planning and implementing projects of common interest ('PCIs') that are required to implement the 11 strategic geographical energy infrastructure priority corridors identified in the fields of electricity, offshore grids, hydrogen and electrolysers, and the three Union-wide energy infrastructure priority areas for smart electricity grids, smart gas grids and carbon dioxide transportation networks. It also sets up a framework for identifying, planning and implementing projects of mutual interest ('PMIs') developed by the Union together with third countries in the fields of electricity, hydrogen and carbon dioxide transportation networks.
- (2) Commission Delegated Regulation (EU) 2024/1041 established the first Union list of PCIs and PMIs as Annex VII to Regulation (EU) 2022/869.
- (3) The eligible projects proposed for inclusion in the Union list of projects of PCIs and PMIs referred to in Article 3 of Regulation (EU) 2022/869 were all assessed against the mandatory sustainability criterion for all project categories in accordance with the provisions in that is laid down in that Regulation. Only the projects that demonstrated significant contributions to sustainability were assessed further by the regional groups referred to in Article 3 of Regulation (EU) 2022/869 who confirmed that those projects meet the criteria laid down in Article 4 of that Regulation.
- (4) The Commission has assessed the candidate projects in view of the requirements of Article 3(5) of Regulation (EU) 2022/869.
- (5) The draft regional lists of PCIs and PMIs were agreed upon by the regional groups at technical-level meetings.
- (6) On 30 September 2025, the Agency for the Cooperation of Energy Regulators (ACER) issued its opinion on the consistent application of the assessment criteria and the cost/benefit analysis across regions. Subsequently, on 24 October 2025, the regional groups' decision-making bodies adopted the final regional lists. Pursuant to Article

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<sup>7</sup> OJ L 152, 3.6.2022, p. 45, ELI: <http://data.europa.eu/eli/reg/2022/869/oj>.

3(3), second subparagraph, point (a), of Regulation (EU) 2022/869, prior to the adoption of the regional lists, all proposed projects were approved by the Member States to whose territory the projects relate.

- (7) The projects proposed for inclusion in the second Union list were subject to a public consultation. Moreover, organisations representing relevant stakeholders, including representatives of third countries, producers, distribution system operators, suppliers, local populations and consumer and environmental protection organisations were invited to the technical discussions in the regional groups and consulted on the projects proposed for inclusion in the Union list.
- (8) PCIs should be listed per strategic trans-European energy infrastructure priorities in the order laid down in Annex I to Regulation (EU) 2022/869. PMIs that are not required to implement the energy infrastructure priority corridors and areas set out in Annex I to Regulation (EU) 2022/869, should be listed separately as per the infrastructure category they belong to and by the region where they are located.
- (9) PCIs and PMIs should be listed either as stand-alone PCIs and PMIs or as a part of a cluster of several PCIs and PMIs where they are interdependent or (potentially) competing.
- (10) In the case of Cyprus and Malta regarding one interconnection for each of those Member States, which is provided for in Article 24 of Regulation (EU) 2022/869, the Commission has received the documentation required in accordance with paragraphs 1 and 2 of that Article. The respective projects were presented during the technical regional group meetings and the relevant documentation, excluding business secrets, was published. One interconnection for Malta and one interconnection for Cyprus, which are necessary to interconnect those Member States to the trans-European gas network, should, therefore, maintain their status as PCIs.
- (11) The Union list contains projects at different stages of their development, including the pre-feasibility, feasibility, permit-granting and construction. For PCIs and PMIs at an early stage of development, studies may be needed to demonstrate technical and economic viability and compliance with Union legislation, including environmental legislation. In this context, potential negative impacts on the environment should be adequately identified, assessed and avoided or mitigated. Moreover, relevant climate adaptation measures as regards the development of the projects should be identified and taken into consideration.
- (12) The inclusion of projects on the Union list is without prejudice to the outcome of the relevant environmental assessment and permit procedure.
- (13) Regulation (EU) 2022/869 should therefore be amended accordingly.

HAS ADOPTED THIS REGULATION:

*Article 1*

Annex VII to Regulation (EU) 2022/869 is replaced by the text in the Annex to this Regulation.

*Article 2*

This Regulation shall enter into force on the twentieth day following that of its publication in the *Official Journal of the European Union*.

This Regulation shall be binding in its entirety and directly applicable in all Member States.

Done at Brussels, 1.12.2025

*For the Commission*  
*The President*  
*Ursula VON DER LEYEN*