



Hynetwork's response to consultation feedback on the draft roll-out plan

16 april 2025

hynetwork
subsidiary
of Gasunie

Hynetwork's response to consultation feedback on the draft roll-out plan

In the summer of 2022, the then Minister for Climate and Energy Policy published the roll-out plan for the hydrogen transmission network in a letter to Dutch parliament. In this letter, the minister announced that Hynetwork would be commissioned to develop and operate the Dutch hydrogen network. Developing this national hydrogen transmission network is a strategic project spanning multiple years that involves a high level of complexity and the associated risks.

Following the decision on the scope of the Delta Rhine Corridor (DRC), we made a new proposal in December 2024 to amend the roll-out plan and submitted it to the market for consultation.¹ Running from 10 December 2024 to 31 January 2025, the consultation attracted feedback on the plan amendment from a broad spectrum of around 60 parties, including producers, customers, industry associations, local and provincial authorities, foreign companies and network operators, representatives of industrial clusters, and port authorities. We would like to extend our gratitude to all those parties who gave their feedback as part of the consultation. The feedback underlines hydrogen's continued importance in the energy transition and echoes the market's great commitment to the development of the national hydrogen transmission network. All the parties who sent in their feedback also see the importance of collaboration and coordination, on which we concur wholeheartedly.

We are seeing that parties' commitment to the hydrogen project also, understandably, leads to questions and concerns. Clarity and certainty on the development schedule and ultimate availability of the hydrogen network are crucial for industry to be able to fulfil their strategic role in the hydrogen value chain. With this in mind, we have chosen to base our roll-out strategy and the proposed amendments to the roll-out plan on timelines that factor in risks and delays as much as possible.

We have held feedback sessions with all parties that sent in a response to the consultation. On top of that, we organised information sessions to share the timelines and risks, explaining that it has turned out not to be possible to further accelerate the roll-out plan due to the complexity and various other factors, including permitting procedures. Our intention behind this kind of mutual coordination and further collaboration with market parties and the local communities is to pre-empt risks as much as possible, so that we can together go full steam ahead in developing the hydrogen network. Both we ourselves and the market have experienced this as highly positive and we have agreed to keep the dialogue going.

General feedback from the market

We received feedback on our proposal to amend the roll-out plan from across the entire hydrogen value chain. This level of commitment just goes to show how important the hydrogen infrastructure is to the entire value chain. However, the roll-out plan purely concerns the development of the national hydrogen transmission network. Some of the points made in the consultation feedback are outside the scope of the roll-out plan. There are, for example, a lot of questions among the market parties about hydrogen transmission tariffs and how these tariffs will or may develop going forward. Questions to this effect were also raised during the aforementioned information sessions.

¹ <https://www.hynetwork.nl/en/knowledge-base/article/consultation-about-proposed-changes-to-the-roll-out-plan>

Hynetwork understands the concerns around the lack of clarity on (future) tariffs. We also see a risk of a tariff hike when tariffs become subject to regulation. Without solutions, the way the market is developing at present in combination with the increase in costs could lead to a significant increase in the transmission tariff when regulated tariffs first come into effect. Hynetwork has meanwhile conveyed its own concerns in this respect to the Minister of Climate Policy and Green Growth, along with a number of possible pathways for a solution. Hynetwork is already in talks with ACM on possible regulatory solutions. Additionally, we are engaging with the ministries of Finance and Climate Policy and Green Growth on solutions to keep tariffs stable and predictable for market parties. We are committed to maintaining these talks with the Ministry of Climate Policy and Green Growth, the Ministry of Finance and ACM to discuss market development, additional financial support from the government, the specifics of future tariff regulation by ACM, and other financing models so as to ultimately arrive at a final solution (which could be the model used for the German hydrogen network).

Consultation feedback

The nearly sixty responses to the consultation we received from the various parties mostly address the same topics. Hynetwork has whittled these down to four points: timeliness, additions, further specifics and border points. Below we will go into each of these four points in detail.

1. Timeliness of development

To synchronise development of the network with development of the hydrogen market, the Dutch hydrogen network will be built in four phases. The roll-out strategy is geared towards matching hydrogen supply to hydrogen demand as quickly as possible, and subsequently delivering a national network with connections to other countries and hydrogen storage facilities.

The first section to be completed is the one in Rotterdam, followed by sections in the other clusters along the coast. Next, we will develop interconnections between the clusters and connections to the industrial cluster in the province of Limburg and border points, and we will ultimately upgrade the entire hydrogen network. We are also looking into how to realise the connection to the planned offshore hydrogen network.

In their feedback, the parties point out that large-scale projects in the hydrogen value chain depend on the network being up and running in a timely manner. The importance of timely connection to storage facilities and hydrogen grids in Germany and Belgium resonates in several of the responses. Hynetwork understands each and every one of these requests for acceleration. We are utterly aware of the importance of timely implementation of the roll-out plan for the development of projects in the hydrogen value chain and for decarbonisation of energy and resource usage in the Netherlands. A timely east-to-west connection for hydrogen transmission through the DRC is an essential link in the chain. We are going all out to meet the schedule, working together and aligning our efforts with the various stakeholders in the regions. At the same time, we want to provide full clarity on what is feasible and not make any promises we cannot keep. The roll-out plan describes the phasing of our development of the hydrogen network. Due to capacity limitations in terms of engineering, construction and around project procedures, we are unable to build all sections of the network at the same time. Additionally, our ambition is to repurpose as much of the existing natural gas network as possible for the hydrogen transmission network. The degree to which pipelines can be freed up depends partly on technical requirements and the reduction of demand for natural gas. The way things

stand now, the sequence adopted in the roll-out plan is the fastest way to develop the network while taking into account the development of the hydrogen value chain as a whole.

Project procedures launched

For large parts of the network, the project procedure already has us working on the project decision regarding spatial integration of the network, as well as on permitting processes. This concerns the project decision and the permitting procedures for the industrial clusters in the northern part of the Netherlands, around the North Sea Canal, and in the south-western region of the Netherlands, as well as for the connecting sections of the network in the provinces of Drenthe and Overijssel, the East of the Netherlands, the West of the Netherlands, and the Delta Rhine Corridor (DRC). Partly thanks to experience gained in these procedures, we now have a clearer picture of what timing would be feasible in the various phases of the roll-out plan, having carefully weighed the interests involved and given the spatial integration in these procedures. While feasible, the timeline from the roll-out plan is highly ambitious, leaving no scope to move pipeline sections from one phase to another, meaning that Hynetwork cannot commit to acceleration.

West-to-east connection

Many of the consultation responses stress the importance of interconnecting the industrial clusters along the Netherlands' western coast with other parts of the Netherlands, and connecting the network to storage facilities and networks in neighbouring countries. We are currently working hard to weigh the various alternatives for the connection between the North of the Netherlands and the West, Rotterdam and the DRC. We expect to be able to give greater clarity on this in the first quarter of 2026. We also understand that the lack of a specific completion date for the IJsselmeer route is unsatisfactory. Following the decision to develop the DRC route as the first west-to-east connection, there is, given the market expectation as it stands, no reason to develop the IJsselmeer route before 2033. The objective of interconnecting the five major industrial clusters, export points and storage facilities is partly met by the construction of the DRC. Given the fact that the Wieringermeer-Beverwijk stretch of section 12 is already part of the IJsselmeer route, a decision on section 12 will trigger a study of the various scenarios that will have to provide greater clarity on what other specific pipelines of the IJsselmeer route (section 13) can be used for hydrogen transmission. This will have to factor in rising demand for natural gas transmission along these pipelines. One part of this study is to work out scenarios to see how these natural gas pipelines can be freed up for hydrogen transmission. This study will be completed in the third quarter of 2025. The project procedure will subsequently be launched as soon as possible based on the study results.

Factors affecting the planning process

The following factors have a permanent impact on the planning process. Firstly, we are seeing that permitting-related project procedures are taking longer than estimated in the initial roll-out plan. One reason why permitting procedures are taking longer is that the steps of the network design process and the permit application are closely correlated. A step can often only be taken once the previous one has been completed and not, as we initially thought, in parallel. Secondly, we are seeing that capacity (in terms of quantity and quality) at the parties that are crucial for the required study and for the network roll-out is not unlimited.

If opportunities for acceleration arise in the future, we want to seize those as much as possible. This could be, for example, if any additional development capacity were to become available at any time (such as at contractors). In order to spot and assess any opportunities for acceleration as well as possible, we call on parties to state their interest in using the national hydrogen transmission network to Hynetwork.²

2. Additions to the roll-out plan

In their feedback, the parties not only call for acceleration, but some of them also make an appeal for amplification of the roll-out plan by adding more pipelines. Parties also ask to include the cluster-6 industries from outside the five industrial clusters in the roll-out plan, as well as a connection to those industries.

Cluster 6

Hynetwork is pleased with the interest shown, even by parties outside the industrial clusters. It shows the widespread interest from across the market and a desire to get clarity on these matters as quickly as possible. Hynetwork recognises this picture from the talks we are having with interested parties and our frequent contact with companies from cluster 6. Based on our roll-out strategy and given the current timeline, we will continue to explore ways to connect companies from cluster 6. This is why Hynetwork maintains continuous talks with all parties to develop the hydrogen market, whereby our intention is to use a Connection Study Agreement (CSA) to agree on how to work towards a binding connection agreement and establish a connection.

Regional market regulation

Hynetwork also hopes to see clarity on the regional market regulation issue as soon as possible. Hynetwork is in talks with the Ministry of Climate Policy and Green Growth about this to explore ways to do this as efficiently as possible, while working closely together with regional grid operators through the Netbeheer Nederland trade association, including in the HyRegions project.

Offshore

Hynetwork foresees that a connection to the future offshore hydrogen infrastructure will have to be established. As the first step in creating this offshore network, the Dutch Ministry of Climate Policy and Green Growth has planned two demonstration projects: Demo 1 and Demo 2. Even though connecting an offshore network is not yet explicitly part of the task we have been set by the ministry, it does tie in well with our roll-out strategy. We would, therefore, like to build this connection as per the timelines foreseen by the Ministry of Climate Policy and Green Growth and have asked to have this added to our commission.

2 <https://www.hynetwork.nl/en/business/become-a-customer/contracts>

3. Further specifics, more details

The roll-out plan is a schematic representation of the phased development of the hydrogen network, rather than an exact map of the infrastructure as it will ultimately be. However, the consultation feedback shows that the parties need more specifics for the roll-out timeline and further details of the pipeline sections.

In response, we would like to refer to the publicly available documents from permitting procedures already initiated for large parts of the hydrogen network.³ These documents, which include a notification of intention and proposal for participation, provide more detailed information on those parts of the network. In addition, we would be more than willing to engage with future network users and other stakeholders to discuss how the roll-out plan affects them and what information they would like to see included in the plan. In fact, many talks to this effect are already ongoing. We are also working to scale up the provision of the latest information on the (preferred) pipeline route on our website.⁴

Hynetwork thoroughly appreciates the need for more detailed information, and since we want to provide that wherever and whenever we can, we have based the roll-out plan on timelines that factor in risks and delays for each section of the hydrogen network as much as possible. What we have put together is a deterministic schedule (P0). Since large-scale, long-term projects such as the development of the hydrogen network come with a high degree of uncertainty and associated risks, we have performed extensive risk analyses. The impacts of the risks have been captured in a P50 schedule and a P90 schedule, whereby the number indicates that the probability of the project being completed on schedule is 50% and 90% respectively. The idea behind this is to give the market the greatest possible clarity on the schedule and any uncertainties. The schedule is becoming increasingly detailed and more robust as we progress through the project procedure.

4. Border points

In their consultation feedback, the parties stress the importance of getting sufficient transport capacity available at the right border points in both a timely and coordinated manner. They would also like to see border points that can instantly be used for both hydrogen imports and hydrogen exports, i.e. bidirectional border points.

The Netherlands has the ambition to be a key player in the international hydrogen market by fulfilling a crucial hub function. This is not only a way to decarbonise Dutch industry, it is also a driver of employment and economic growth in the Netherlands. This perspective highlights the major importance of having border points between the Dutch hydrogen transmission network and the adjacent hydrogen transmission networks in neighbouring countries. These connections are also an explicit part of the minister's commission to Hynetwork. There is continuous coordination between Hynetwork and the future network operators in neighbouring countries to ensure that the projected hydrogen flows can be accommodated in the best way possible. Hynetwork and the TSOs from the neighbouring countries are synchronising their respective schedules as much as possible. The border points that will ultimately be developed will facilitate optimum border capacity in step with market

³ <https://www.rvo.nl/onderwerpen/bureau-energieprojecten/lopende-projecten#gasinfrastructuur> (in Dutch)

⁴ <https://www.hynetwork.nl/en>

developments. When it comes to Germany in particular, we are seeing that the border points in our proposal for the roll-out plan, both in terms of scheduling and capacity, are aligned with the border points proposed as part of the German 'Kernnetz' in the autumn of 2024 (the proposal from the joint German network operators for a national hydrogen transmission network).⁵

As we coordinate with network operators in neighbouring countries, we also assess what specific investments will be needed to ensure good-quality cross-border connections. We are, for example, entering into specific agreements on the planned border stations. Aside from that, our focus is also on aligning operational aspects such as pipeline pressure, balancing the international network and hydrogen quality, and ensuring that agreements are made on these aspects. At this point, we are not ruling out any option, including the option to make border points bidirectional right from the start and the option to create possible other border points. Together with the network operators from our neighbouring countries, Hynetwork is working to harmonise cross-border hydrogen transport.

Summary

In this response, we have given a high-level impression of the consultation feedback to our proposal to amend the roll-out plan. The final version of the roll-out plan will be adopted by the Minister of Climate Policy and Green Growth. We would like to keep the dialogue going with all parties from across the hydrogen value chain and are committed to building the hydrogen network within the shortest possible time span.

5

<https://fnb-gas.de/wp-content/uploads/2024/10/Genehmigung-des-Wasserstoff-Kernnetzes.pdf>

info@hynetwork.nl
www.hynetwork.nl

hynetwork
dochteronderneming
van Gasunie