Forsyningstilsynet

The Danish Electricity and Natural Gas Markets 2024

Analysis

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Foreword

The Danish Utility Regulator (DUR) is the regulatory authority in Denmark for the utility sectors - electricity, natural gas, district heating, and waste.

The National Report summarises the main developments in the Danish electricity and gas markets during 2024 at the wholesale and retail levels, as well as the grid at DSO and TSO level. This report also presents an overview of the current legal and regulatory arrangements in Denmark.

In 2024, DUR continued to work towards strengthening market efficiency, ensuring transparency, and supporting the transition to a climate-neutral energy system. The year was characterised by a focus on implementing new EU requirements, adjusting tariff methodologies, and enhancing market rules to promote cost-reflective, transparent, and predictable conditions for all market participants.

Electricity prices in both Danish bidding zones fell significantly compared to 2023, largely due to lower gas prices, reduced European demand, and continued growth in renewable energy production. The number of hours with negative prices increased further, reflecting the expansion of wind and solar generation. Consumption rose slightly from 2023 levels but remained below pre-2022 figures, and Denmark continued to rely on imports, particularly from neighbouring Nordic countries.

In the gas sector, Denmark maintained its role as a transit hub following the completion of the Baltic Pipe project, with imports and exports remaining high. The share of biomethane in total gas consumption continued to grow, further reducing reliance on fossil gas. Market regulation in 2024 also included tariff adjustments, implementation of revenue cap regulation, and measures to increase transparency in gas transmission and distribution.

Carsten Smidt
Director General
Danish Utility Regulator (DUR)

1. Note on the structure of this Report

The Danish Utility Regulator (DUR) is the national regulatory authority for the utility sectors - electricity, natural gas, district heating, and waste. DUR monitors the development of these markets.

The purpose of this report is to describe the development of the electricity and natural gas market, and to present an overview of the current arrangements for network regulation and the technical functioning of the electricity and gas sectors in Denmark, including approved terms and conditions or methodologies (TCMs) throughout the year.

DUR must perform tasks pursuant to the *Electricity Directive (2019/944/EC)* concerning common rules for the internal market in electricity, and the *Gas Directive (2009/73/EC)* concerning common rules for the internal market in natural gas. This involves the annual compilation of a report in accordance with the reporting requirements pursuant to the *Article 59 of the Electricity Directive* and the *Article 41 of the Gas Directive*. This report concerns topics related to regulation, competition, and the security of supply.

The structure of the present report reflects CEER's "Advice on the Structure of Future National Reports and Relevant Indicators" (Ref: C19-MRM-101-03, March 2020), yet there is no one-to-one correspondence between this and the structure of the present report.

2. Main developments in the gas and electricity markets

2.1. Evaluation of the market development and regulation

In 2024, the Danish gas and electricity markets experienced regulatory and operational changes designed to improve efficiency, transparency, and consumer protection, while maintaining alignment with EU legislation.

In the electricity market, regulatory work reinforced the supplier-centric model through the revision of *Elleveringsbekendtgørelsen* (*Executive Order 1728 of 30 December 2024*, in force from 17 January 2025). This update consolidates provisions, strengthens consumer protection, and formalises supplier obligations to publish accurate product and price information on their websites and in the price comparison tool (elpris.dk). Upgrades to elpris.dk are planned for 2025. Work is also under way on revising the billing executive order (*Executive Order 1696 of 2016*) with intended implementation on 1 January 2026 to improve bill clarity and comparability.

In the gas market, the supplier-centric model introduced in April 2023 is now fully implemented. DUR approved Evida's harmonised gas distribution tariff model in November 2024, establishing uniform nationwide charges and a capacity-based system tariff. DUR also granted Evida an exemption from tariff discounts for renewable and low-carbon gas producers under *Article 18(5) of the EU Gas Regulation* to ensure cost-reflective pricing and avoid cross-subsidisation.

From an electricity market integration perspective, Denmark joined the European balancing energy activation platform PICASSO in October 2024. This led to changes in imbalance settlement, which now includes both manual frequency restoration reserve (mFRR) and automatic frequency restoration reserve (aFRR) balancing energy prices.

In gas transmission regulation, DUR finalised the framework for Energinet's gas transmission revenues, approved tariff methodology amendments, and monitored developments following the completion of the Baltic Pipe project to ensure transparency and cost efficiency.

Security of supply remains high in both sectors. In electricity, interruption times are among the lowest in Europe. In gas, despite technical issues at the Tyra platform, security is underpinned by high European storage levels, biomethane production, and emergency reserves. A new emergency preparedness law in 2025 further supports resilience.

Overall, regulation in 2024 has focused on enhancing transparency, consumer empowerment, and market integration, ensuring cost-reflective and non-discriminatory network charges in line with EU internal market requirements.

2.2. Report on the implementation of the Clean Energy Package

The co-legislators in the European Parliament reached an agreement on reforming EU electricity market in December 2023. This reform aims to ensure stability and flexibility, integrate more renewable energy sources such as solar and wind, and strengthen the market's resilience to price fluctuations. The work is expected to include, among other things, the initiation of so-called national flexibility adequacy assessments, which are intended to support the increasing flexibility in the electricity system. The new electricity market design rules entered into force in July 2024[1].

In 2025 and beyond, we will continue to participate in the work to implement the reform of the European electricity market.

3. Competition and market functioning

3.1. Electricity

3.1.1. Wholesale electricity market

3.1.1.1. Production, consumption, and net imports

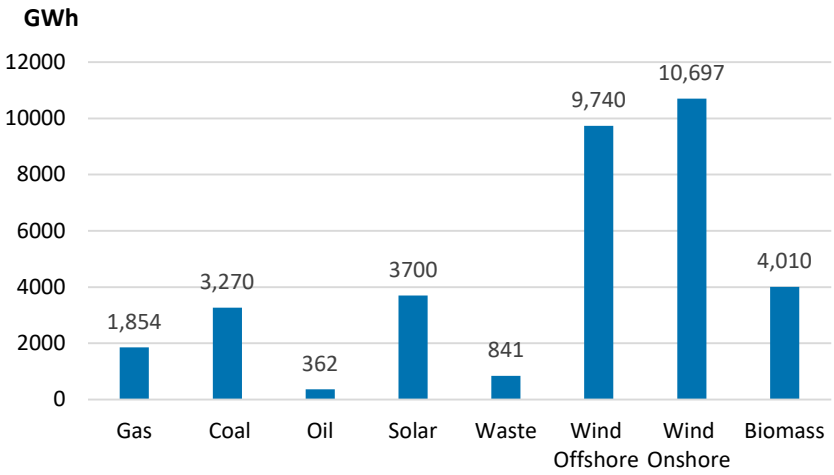
Electricity generation in Denmark reached 34.5 TWh in 2024, representing a 5.8 percent increase compared to 2023. Figure 1 presents the electricity generation by sources, measured in GWh and shown as each source’s percentage share of the total electricity production in 2024. The electricity generation mix in Denmark continues to shift toward a higher share from wind, solar, and biomass, further reducing reliance on coal and gas. Compared to 2023, the share of electricity generated from these renewable sources increased by only 1.5 percentage points, bringing the total share to roughly 82 percent in 2024.

In 2024, Denmark had a total installed electricity generation capacity of 11,236 MW, consisting of 3,730 MW of solar, 4,860 MW of onshore wind, and 2,646 MW of offshore wind. Figure 2 presents the generation mix by illustrating the proportion contributed by each generation source.[2]

[1] For more information, see: Electricity market design, European Commission, available at: link

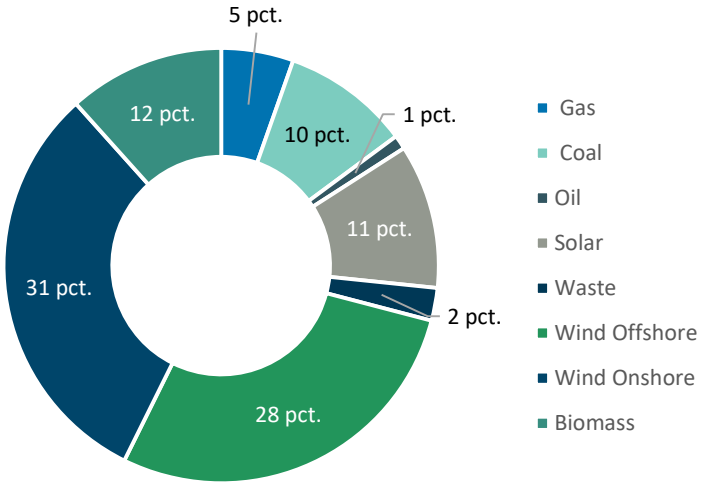
[2] Source: ENTSO-E – Transparency Platform, available at: link

FIGURE 1 | **ELECTRICITY GENRATION BY SOURCE IN GWH, 2024**



Source: ENTSO-E

FIGURE 2 | **SHARE OF ELECTRICITY GENERATION BY SOURCE, 2024**

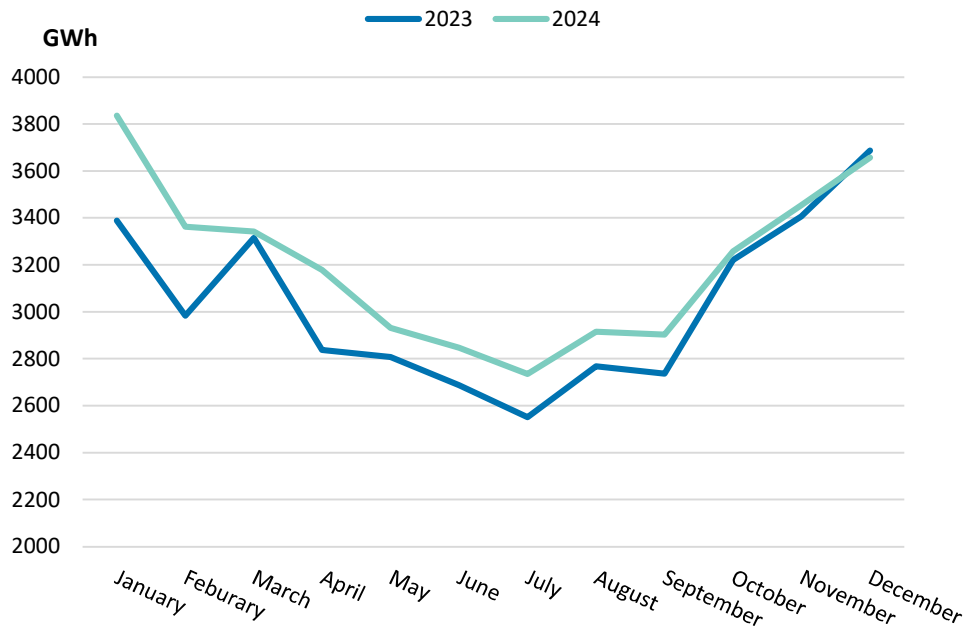


Source: ENTSO-E
Note: Electricity generation in Denmark by source (gas, coal, oil, solar, waste, offshore wind, onshore wind, and biomass), shown as each source's share of total generation as a percentage.

In the Danish wholesale electricity market, consumption increased slightly in 2024 compared to 2023. Total consumption reached 38.1 TWh, representing a 5.5 percent Increase compared to 2023 (cf. Figure 3). This growth is linked to the ongoing electrification of society and a decline in electricity prices following the historically high energy prices in 2022.

The number of heat pumps used in building for heating rose by 15.9 percent in 2024 compared to the previous year. In addition, the number of newly registered electric vehicles increased by 42.3 percent in 2024 compared to 2023.

FIGURE 3 | **ELECTRICITY CONSUMPTION BY MONTH IN GWH, 2023 AND 2024**

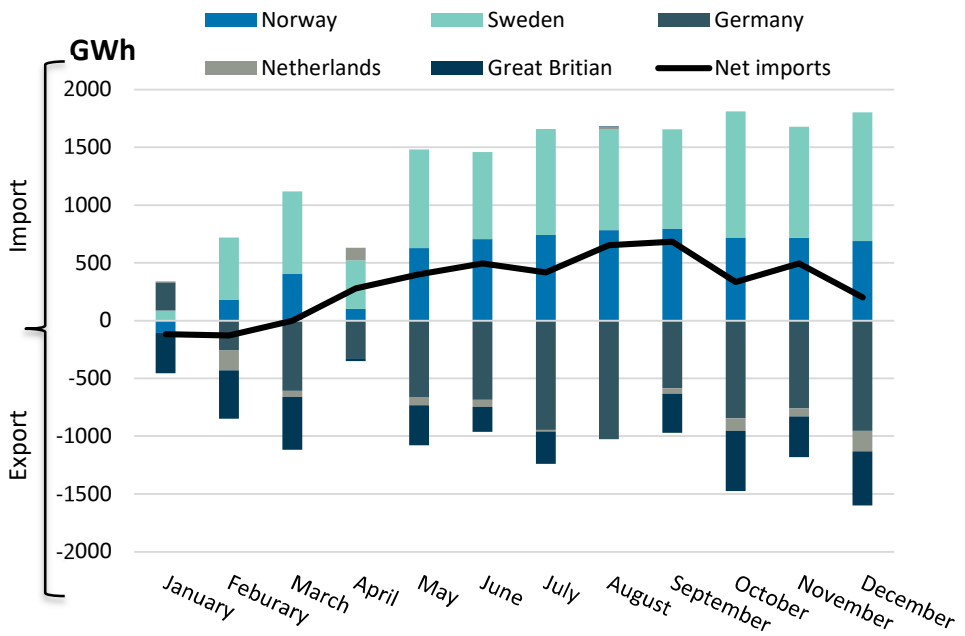


Source: Energinet

Denmark's net electricity imports in 2024 amounted to 3.7 TWh (cf. Figure 4). Denmark has been a net importer since 2021. Net imports increased by 19.4 percent compared to 2023. In 2024, Denmark imported electricity from Sweden (9.2 TWh) and Norway (6.4 TWh), and exported to Germany (7.4 TWh), the Netherlands (0.6 TWh), and the Great Britian (3.8 TWh).

As of June 16, 2025, there were 430 market participants registered in Denmark on ACER's REMIT portal.[3] This number represents the total number of market participants across both the wholesale electricity and gas markets.

FIGURE 4 | **ELECTRICITY TRADE WITH NEIGHBOURING COUNTRIES IN GWH, 2024**



Source: Energinet
Note: Monthly import from and export to Norway, Sweden, Germany, the Netherlands and the Great Britain, along with total net imports.

3.1.1.2. Cross-zonal transmission lines

The *Electricity Market Regulation 2019/943* has imposed a minimum requirement of 70 percent capacity for cross-border trade as of 1 January 2020. The regulation gives a possibility for derogation from the minimum requirement, subject to approval by the relevant national regulatory authority.

The Nordic flow-based capacity calculation method was launched on 29 October 2024 to optimize electricity exchange between the Nordic bidding zones. In the first two months following its implementation, capacity utilisation has increased by up to 20 percent.[4]

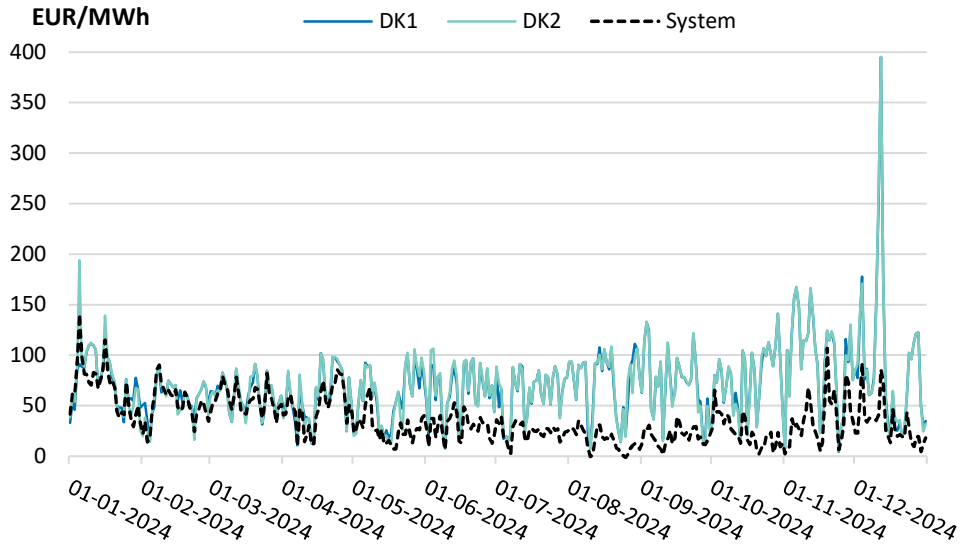
[3] Source: ACER – REMIT Portal, available at: link

[4] Source: Energinet, available at: link

3.1.1.3. Prices

The average hourly prices in the day-ahead market in 2024 for DK1 and DK2 were 70.6 and 70.9 EUR/MWh, respectively (cf. Figure 5). This corresponds to a price decrease of 18.6 percent in DK1 and 12.8 percent in DK2 compared to 2023. Furthermore, these are the lowest average prices for both of the Danish bidding zones since 2020. A price difference arises between different bidding zones when trading capacity exceeds the physical capacity at the cross-border interconnectors. In 2024, the price convergence between DK1 and DK2 increased. The average yearly price spread was 3.7 EUR/MWh, representing a 58.4 percent decrease compared to 2023. If the Nordic countries were a single bidding zone without any transmission capacity constraints, the day-ahead market would have cleared at a single price, namely the system price. The average system price in 2024 was 36.1 EUR/MWh.

FIGURE 5 | **DAILY PRICE DEVELOPMENT IN THE DAY-AHEAD MARKET, 2024**



Source: Energinet
Note: The development of day-ahead prices for West Denmark, East Denmark, and the system price.

Denmark is located between the Nordic region, where electricity generation is primarily hydropower-based, and Central Europe, where it is largely based on thermal and renewable sources. Due to this geographical position, Denmark effectively acts as a transit country between two distinct generation mixes.

Several factors influence the price of electricity in Denmark: weather conditions, fuel and CO_2 prices, and the filling ratio of the Nordic hydro reservoirs. The price decrease in 2024 can be attributed to the high filling ratio of the Nordic hydro reservoirs at the

end of the year, despite rising gas prices. In addition, the high share of electricity production from renewables in Denmark and neighbouring countries led to a record number of hours with low and negative prices.

In 2024, Denmark experienced a total of 650 hours with negative prices – 375 hours in DK1 and 275 hours in DK2. This represents a 27 percent increase compared to 2023. On 12 December 2024, the average daily day-ahead electricity price in both Danish bidding zones peaked at approximately 395.4 EUR/MWh, due to a combination of low wind and solar generation and high electricity demand.

Market participants use the intraday market to balance their consumption and generation portfolios – for example, in the event of an outage or when wind generation falls short of expectations. The average intraday price was 70.7 EUR/MWh in DK1 and 72.1 EUR/MWh in DK2 in 2024.

3.1.1.4. Important events in 2024

In 2024, several important events occurred in the Danish wholesale electricity market. Table 1 summarises these events, as well as regulatory changes and developments that took place in the Danish wholesale electricity markets during the year.

TABLE 1 | **IMPORTANT EVENTS IN THE DANISH ELECTRICITY MARKET IN 2024**

28 May 2024	DUR approves the method for the application of PICASSO in Denmark. Find out more here.
13 June 2024	Go-live of Intraday-auctions on the Single Intraday Coupling (SIDC). Find out more here.
11 October 2024	Denmark is connected to the European platform PICASSO enabling the exchange of balancing energy from automatic frequency restoration reserve (aFRR). Find out more here.
21 October 2024	DUR approves the cross-border cost allocation for the Bornholm Energy Island. Find out more here.
29 October 2024	Go-live of the Nordic flow-based capacity calculation method. Find out more here.
19 December 2024	DUR approves Energinet's method for the new imbalance settlement design. Find out more here.

3.1.1.5. Focus areas for 2025

Considering recent developments in the Danish wholesale electricity market, as well as ongoing regulatory changes, DUR will in 2025 focus its market monitoring efforts on specific areas.

One priority area is the reserve market, which will be impacted by several new market initiatives launching in late 2024 and early 2025. DUR will intensify its surveillance of the reserve markets to ensure these initiatives have the intended effect, as Denmark moves towards full integration with the European balancing platforms.

Another priority area is the impact of the Nordic flow-based market coupling, which went live in October 2024. DUR will continue monitoring how this new method influences the Nordic wholesale electricity market.

A third focus area is the implementation of the 15-minute market time unit (MTU) in both SIDC (Single Intraday Coupling) and SDAC (Single Day-Ahead Coupling) during 2025. DUR will monitor the effects of this transition on market functioning and efficiency.

Finally, DUR will continue its work under REMIT, with particular focus on ensuring compliance with registration obligations.

BOX 1 | **WHOLESALE ELECTRICITY: FOCUS AREAS FOR 2025**[5]

- Impact of new methods and intensified market surveillance of balancing markets
- Market surveillance of the Nordic flow-based market coupling
- Market surveillance of the implementation and effects of 15-minute market time unit
- REMIT-related tasks, including compliance with registration obligation.

3.1.2. Retail electricity market

3.1.2.1. Retail electricity prices

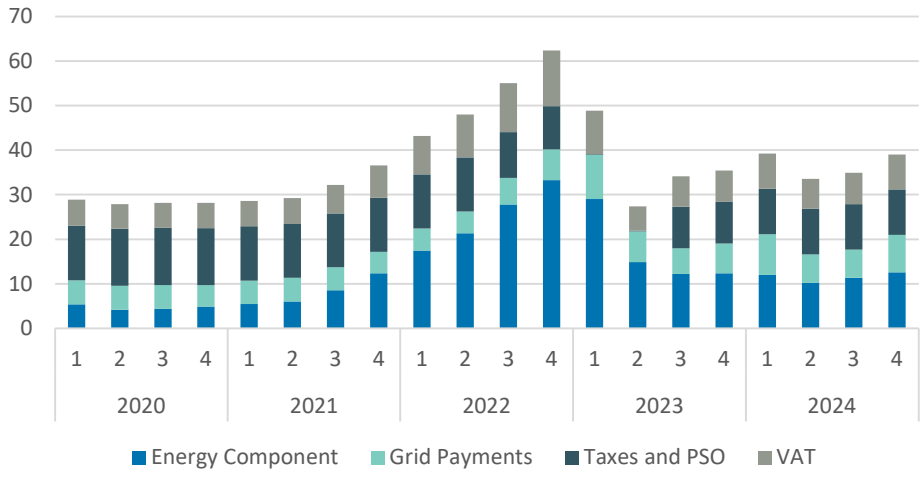
The Danish retail electricity market operates as a fully competitive market, with low entry barriers for new entrants wishing to operate as electricity suppliers.

In 2024 DUR published monthly and quarterly electricity price statistics covering retail prices for both household and non-household consumers with a consumption of up to 100,000 kWh/year. The purpose of the statistical information is to increase transparency and boost consumer awareness with regard to products and prices in the Danish retail market for electricity, thereby enabling consumers to make informed decisions about which product(s) to choose. Annual reports on retail prices for household and non-household consumers with annual consumption of up to 100,000 kWh for 2023 and 2024 are expected to be published during the second half of 2025.

In 2024, the average total electricity price for Danish household consumers was 36.7cEUR/kWh. The average price was at the same level as in 2023, when it was 36.4cEUR/kWh, cf. Figure 6.

[5] DUR's latest comprehensive annual work plan for the next three years – covering electricity, gas, district heating, and waste – was published in December 2024 and is available via this link (in Danish).

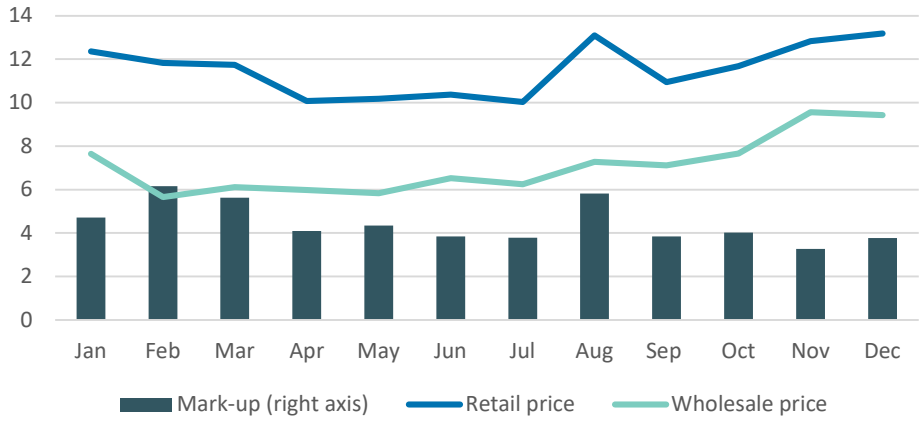
FIGURE 6 | **RETAIL ELECTRICITY PRICE FOR HOUSEHOLD CONSUMERS, 2020-2024**



Source: The Danish Utility Regulator
Note: The calculations are based on a reference household consumption of 4,000 kWh per year, with the unit expressed in cEUR/kWh.

In 2023, the relationship between the retail price of variable electricity products and the wholesale price stabilised, returning to pre-2022 levels (cf. Figure 7), following the highly volatile situation in 2022. This trend continued into 2024, with no notable fluctuations compared to e.g. 2022.

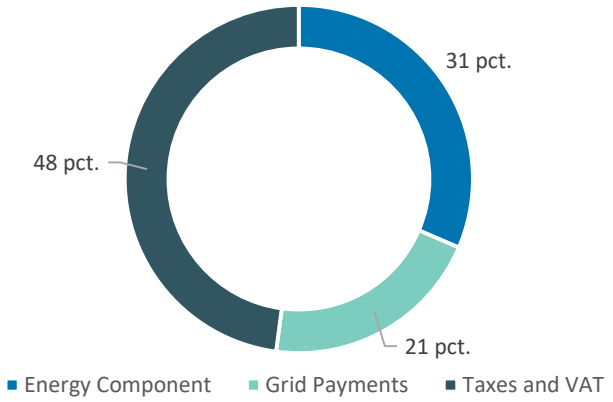
FIGURE 7 | **RETAIL–WHOLESALE ELECTRICITY PRICE CORRELATION, 2024**



Source: The Danish Utility Regulator / Energidataservice

In 2024, the average price paid by household consumers for electricity comprised 48 percent for the energy component, 21 percent for grid payments[6], and 31 percent for taxes, including value-added tax (VAT), cf. Figure 8. Taxes and VAT had previously been the predominant price elements but were overtaken by the energy component in 2023. The Danish energy tax (*elafgift*), which forms part of the electricity price payable by household consumers, was applied at the full rate throughout 2024. Effective as of 1 January 2025 the energy tax was reduced by 4.1 øre per /kWh.

FIGURE 8 | **BREAKDOWN OF TOTAL ELECTRICITY PRICE FOR HOUSEHOLD CONSUMERS, 2024**



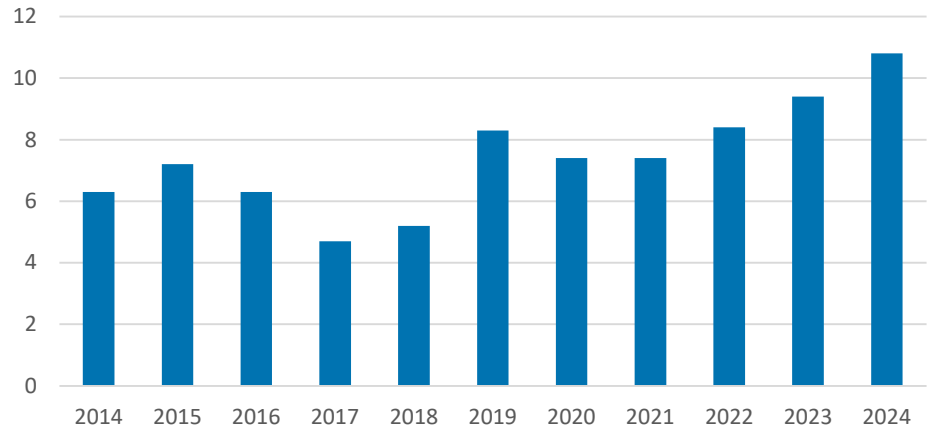
Source: The Danish Utility Regulator
Note: The calculations are based on a reference household consumption of 4,000 kWh per year.

3.1.2.2. Market competition

In 2024, there were approximately 64 electricity suppliers available for consumers to choose from. Consumers can switch suppliers to achieve potential cost savings. Despite this, the rate of such changes, i.e. the external switching rate, remained relatively stable for both household and non-household consumers with an annual consumption of up to 100,000 kWh between 2014 and 2021. There has been a slight increase in the number of consumers switching suppliers since 2021, and that trend continued into 2024, cf. Figure 9. Whether the switching rate has peaked in 2024 remains uncertain. The switching rate was 10.8 percent in 2024 compared to 9.4 percent in 2023, i.e. an increase of approximately 1.4 percentage points.[7]

[6] Grid payments cover DSO grid tariffs, DSO subscription fees, TSO grid tariffs, and TSO system tariffs.
[7] Source: Energinet, Datahub, Detailmarkedsrapporten, available at: link (in Danish)

FIGURE 9 | **ELECTRICITY SUPPLIER SWITCHING RATES, 2016-2024 (PERCENT)**



Source: Energinet

DUR continued its implementation of, and supervisory tasks arising from, *Executive Order 2648 of 28 December 2021 (Elleveringsbekendtgørelsen)* in 2024. This work included monitoring compliance with the duties and legal obligations of electricity suppliers pursuant to the executive order, with particular attention focused on supplier's compliance with their reporting obligations to the Danish price comparison tool, *elpris.dk*. DUR maintained its ongoing efforts to further update, upgrade, and develop the price comparison tool. An updated version of the reporting section aimed at suppliers is scheduled for launch in 2025, along with improvements to the consumer facing part of the site with a view to improving the clarity, comparability, and transparency of electricity price and product information available to Danish consumers.

As part of the implementation of *EU Directive 2024/1711*, *Elleveringsbekendtgørelsen* was revised in the second half of 2024. The revised and extended version was issued as *Executive Order 1728 of 30 December 2024*, which entered into force on 17 January 2025. The revised executive order incorporates a range of consumer protection measures and provisions – some carried over from the previous executive order and other legislation, and some introduced as part of the implementation of the directive.

On 1 July 2024, an updated executive order governing reporting requirements to the Danish price comparison tool (PCT) entered into force: *Executive Order 593 of 3 June 2024*. This executive order clarifies and increases the reporting obligations of electricity suppliers about their products – including prices, terms, and conditions – to the Danish PCT. In connection with updating the executive order and prior to its entry into force, DUR prepared and distributed detailed information and guidelines on the revised reporting requirements to all registered electricity suppliers.

3.1.2.3. Focus areas for 2025

DUR will continue its close monitoring of electricity suppliers' reporting and their continuous and accurate updating of information about products – including terms and prices – to the price comparison tool, *elpris.dk*. The same applies to their compliance with the requirements laid down in *Indberetningsbekendtgørelsen for el*, as well as *elleveringsbekendtgørelsen*, regarding their duties to publish product information (including terms and prices) on their websites and report the same information to the PCT.

DUR will be implementing changes to *elpris.*dk, both back end and front end. Preparation and development of necessary adjustments have been ongoing since 2024.

DUR is planning to expand the scope of planned supervision of supplier activities in the retail electricity market. The aim of this is to broaden the supervision of compliance with the broader regulatory framework governing electricity suppliers' conduct towards consumers in the Danish retail electricity market, with a view to improving consumer protection and ensuring a level playing field between competitors in the retail market.

DUR will be revising the executive order which regulates the requirements and obligations of electricity suppliers with respect to billing customers in the retail electricity market. This involves a full review and update of *Executive Order 1696 of 25 November 2016*, which governs electricity suppliers' billing, invoicing, and invoice information provided to consumers. The aim is to finalize this work in time for the revised executive order to enter into force on 1 January 2026. The purpose of revision is, among other things, to assist and improve consumers' understanding of their bills, as well as to improve the overall transparency of electricity billing in the Danish retail market.

BOX 2 | **RETAIL ELECTRICITY: FOCUS AREAS FOR 2025**[8]

- Continued monitoring of electricity suppliers' obligations to publish product information on their websites and report the same information to the Danish PCT, *elpris.dk*.
- Implementation of changes to the *elpris.dk* (both back and front end)
- Expansion of planned supervision of compliance with the regulatory framework governing electricity suppliers' conduct towards consumers in the Danish retail electricity market
- Revision of Executive Order 1696 of 25 November 2016 (concerning billing)

[8] DUR's latest comprehensive annual work plan for the next three years covering electricity, gas, district heating, and waste – was published in December 2024 and is available via this link (in Danish).

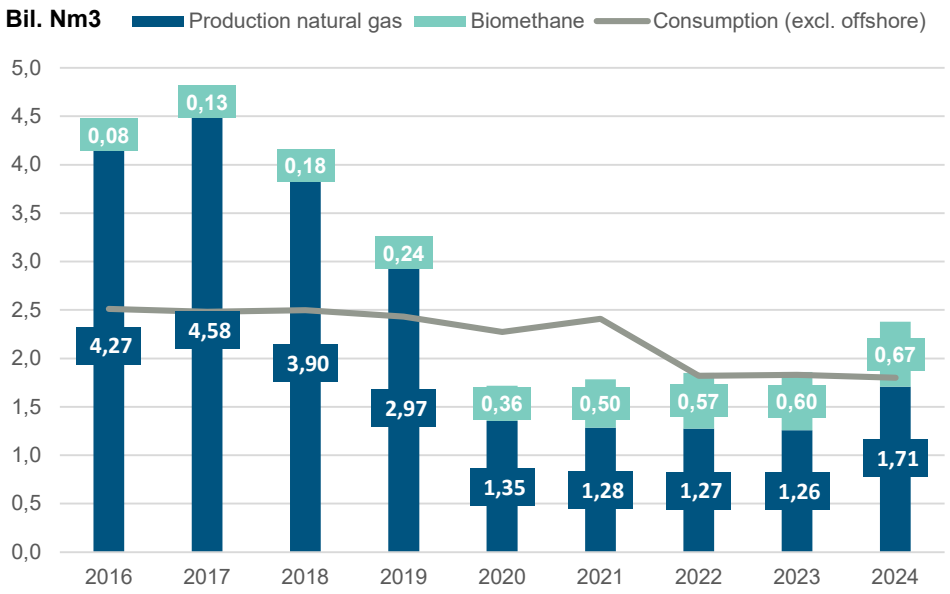
3.2. Gas

3.2.1 Wholesale gas market

3.2.1.1. Production, consumption and net export

Figure 10 shows Denmark's gas production and consumption over time since 2016. Natural gas production in Denmark in 2024 reached 1.71 billion Nm^3, representing an increase of 35.6 percent compared to 2023. This marked a reversal of the declining trend observed in previous years. Biomethane production totaled 672 million Nm^3 in 2024, an increase by 12 percent compared to 2023. Biomethane accounted for 28.2 percent of total Danish gas production in 2024, down from 32.3 percent in 2023. Overall, total gas production in Denmark, including both natural gas and biomethane, increased by 28 percent in 2024, from 1.86 billion Nm^3 in 2023 to 2.38 billion Nm^3.

FIGURE 10 | **ANNUAL GAS PRODUCTION AND CONSUMPTION, 2016-2024**



Source: The Danish Utility Regulator, using data from the Danish Energy Agency and Energi Data Service.
Note: Data from the Danish Energy Agency (DEA) are used for natural gas production and consumption, while data on biomethane production are from Energi Data Service.

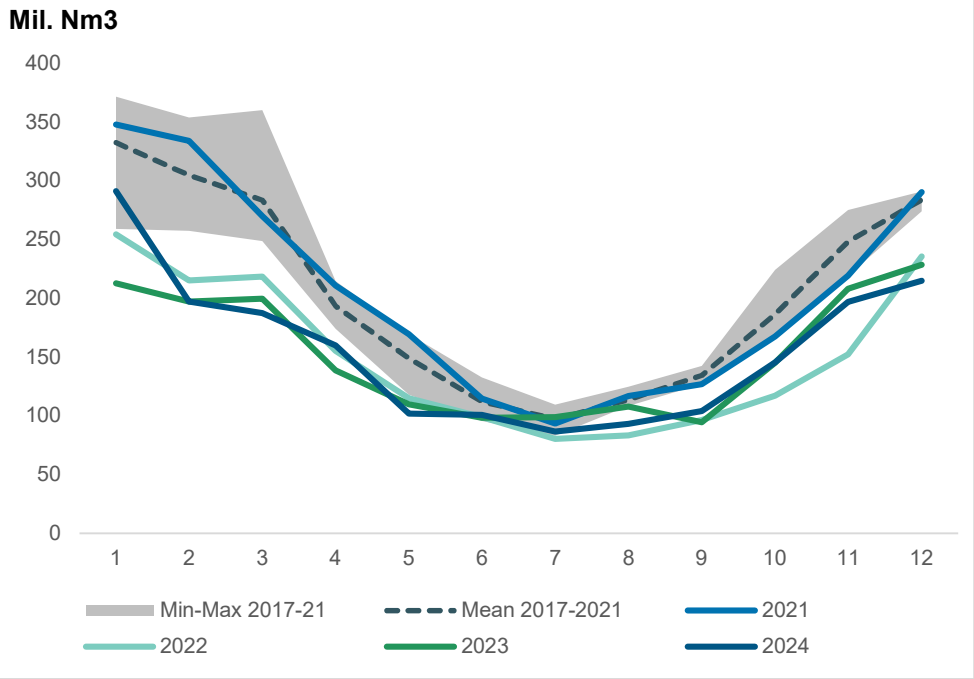
Denmark's natural gas production takes place in the Danish sector of the North Sea. In 2024, 15 Danish gas fields were active, either throughout the year or for part of it. This represents an increase of five active fields compared to 2023. Of these, one was a newly developed field, Solsort, which was brought into operation in March 2024. The

remaining four were linked to the reopening of the Tyra production platform on 21 March 2024, following maintenance that had been ongoing since September 2019.

Danish gas consumption (excluding offshore use) in 2024 was 1.80 billion Nm^3, a decrease of 1.5 percent compared to 2023. This is 25.2 percent lower than in 2021, prior to the 2022 gas crisis. Biomethane accounted for a larger share of total Danish gas consumption (excluding offshore) in 2024 than the year before, increasing to 37.3 percent from 32.9 percent in 2023. The amount of gas consumed for electricity generation in 2024 was 1,854.2 GWh, a decrease of 4.2 percent compared to 2023.[9]

Figure 11 shows the monthly natural gas consumption in Denmark dating back to 2017. Monthly consumption has remained relatively stable, at a visibly lower level than in 2021, as well as below the mean, maximum, and minimum values observed during the 2017-2021 period.

FIGURE 11 | **DENMARK'S MONTHLY NATURAL GAS CONSUMPTION**



Source: The Danish Utility Regulator, using data from the Danish Energy Agency.

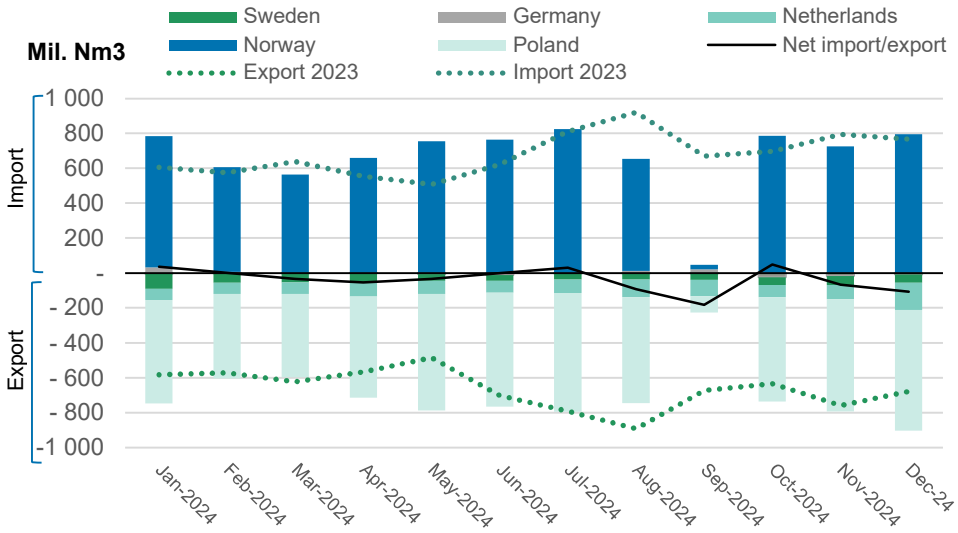
Denmark once again became a net exporter of gas in 2024, with net exports totaling 456 million Nm^3. In 2023, Denmark was a net importer of gas, with net imports of 212 million Nm^3. As in 2023, the majority of imports and exports in 2024 occurred via the Baltic Pipe, which transports gas from Norway to Poland through Denmark.

[9] Source: ENTSO-E

Figure 12 illustrates net imports and exports by country for 2024, based on data published by the Danish Energy Agency (DEA)[10]. Total gas imports to Denmark in 2024 amounted to 7,960 million Nm^3, a 2.5 percent decrease compared to 2023. Imports from Norway made up 99.7 percent of total imports in 2024, while imports from Germany accounted for the remaining 0.3 percent. Total gas exports from Denmark in 2024 was 8,417 million Nm^3, a 5.8 percent increase compared to 2023. The majority of exports were directed to Poland via the Baltic Pipe, which accounted for 80.4 percent of total exports. Exports to the Netherlands made up 11.8 percent of gas exports, followed by Sweden and Germany at 6.7 percent and 0.6 percent, respectively.

In August, and especially in September 2024, both imports to and exports from Denmark were lower than usual due to maintenance activities on the EPII and Baltic Pipe infrastructures.[11]

FIGURE 12 | **DANISH IMPORT AND EXPORT PER COUNTRY, 2024**



Source: The Danish Utility Regulator using data from the Danish Energy Agency (DEA).

3.2.1.2. Trading and market

In Denmark, there are two delivery points for gas trading. The delivery point for gas traded at the European Energy Exchange (EEX) is the Exchange Transfer Facility (ETF). For so called over-the-counter bilateral delivery contracts, the delivery point is

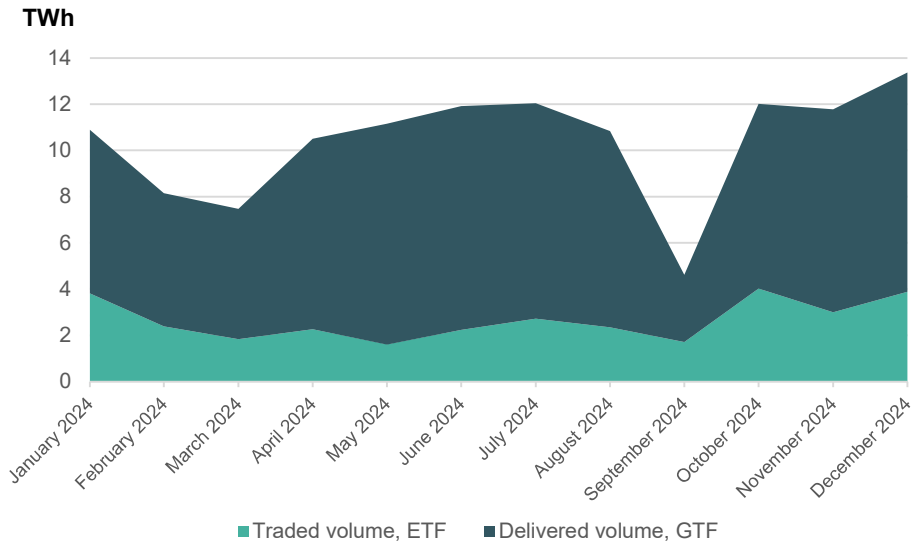
[10] Source: Danish Energy Agency (DEA), available at: link

[11] Source: Energinet, available at: link (in Danish)

the Gas Transfer Facility (GTF). Traded volumes at ETF and GTF are illustrated in Figure 13.

In 2024, 32 TWh gas was traded via ETF while 93 TWh was delivered through GTF, compared to 53 and 83 TWh, respectively, in 2023. GTF thus was the primary delivery point for gas in 2024, as was also the case in 2023.

FIGURE 13 | **TRADED VOLUME AT ETF AND GTF, 2024**



Source: The Danish Utility Regulator, using allocation data from Energinet.

3.2.1.3. Prices

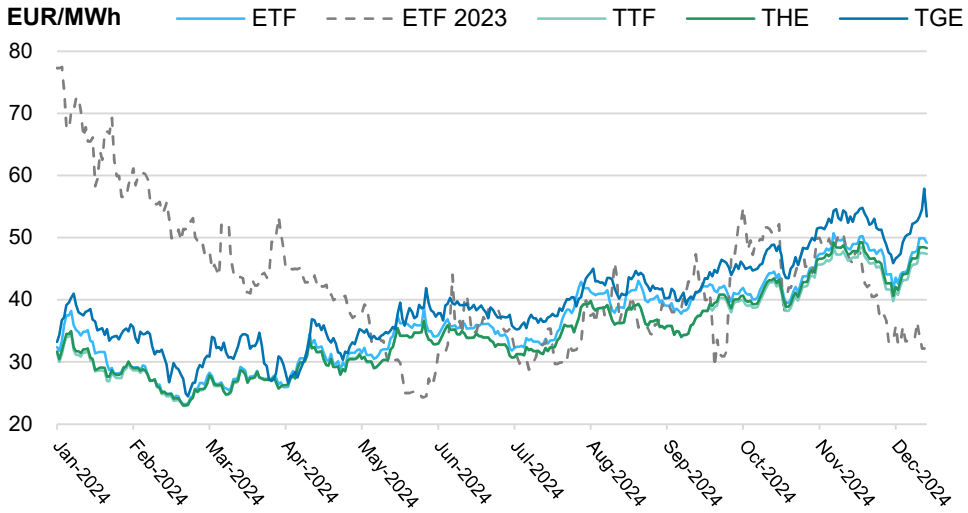
The average day-ahead gas price in Denmark (ETF) in 2024 was 36.09 EUR/MWh, illustrated in Figure 14. This corresponds to a price decrease of 15.9 percent compared to 2023. In the first quarter of 2024, the average day-ahead ETF price was 28.55 EUR/MWh, compared to 55.58 EUR/MWh during the same period in 2023. During the second and third quarters, prices averaged 32.83 and 37.98 EUR/MWh, respectively, compared to 36.75 and 36.34 EUR/MWh in 2023. In the fourth quarter, the average price was 44.84 EUR/MWh, slightly higher than the corresponding 43.18 EUR/MWh in 2023.

Overall, prices in 2024 were more stable than in 2023, although they continued to exhibit notable volatility compared to the period before the gas crisis in 2022. The lowest and highest prices in 2024 were 23.23 EUR/MWh and 50.73 EUR/MWh, respectively, compared to 24.33 EUR/MWh and 77.46 EUR/MWh in 2023.

Danish ETF spot prices generally followed the movements of nearby European gas markets. ETF prices were generally slightly higher than Dutch (TTF) and German

(THE) prices, both of which are more liquid than the Danish gas market. In 2024, the average yearly day-ahead price spread between the Danish ETF and the Dutch TTF decreased to 1.69 EUR/MWh from 2.2 EUR/MWh in 2023. Similarly, the price spread between the Danish ETF and the German THE decreased to 1.44 EUR/MWh, from 1.70 EUR/MWh in 2023. In contrast, the Danish ETF price was on average 3.26 EUR/MWh lower than Poland's TGE price in 2024, up from a difference of 1.49 EUR/MWh in 2023.

FIGURE 14 | **DAY-AHEAD PRICE DEVELOPMENT IN DENMARK, THE NETHERLANDS, GERMANY, AND POLAND, 2024**



Source: The Danish Utility Regulator, using data from the European Energy Exchange (EEX) and Analyses Information Reports Platform (AIR).
Note: Spot prices on the day-ahead market are given by the European Gas Spot Index (EGSI) for the Danish Exchange Transfer Facility, the Dutch Title Transfer Facility, and the German Trading Hub Europe. EGSI is calculated for each delivery day as a volume-weighted average of day and weekend contracts with delivery on the actual day. For Polish TGE prices, day-ahead indices from AIR are used.

3.2.1.4. Utilisation of gas storages

Gas Storage Denmark's two storage facilities had a maximum storage level of 10.13 TWh from 1 January to 31 March 2024. From 1 April to 24 July, the total available capacity was 9.82 TWh, after which it increased to 10.37 TWh for the remainder of the year. The storage capacity was fully utilised in 2024.

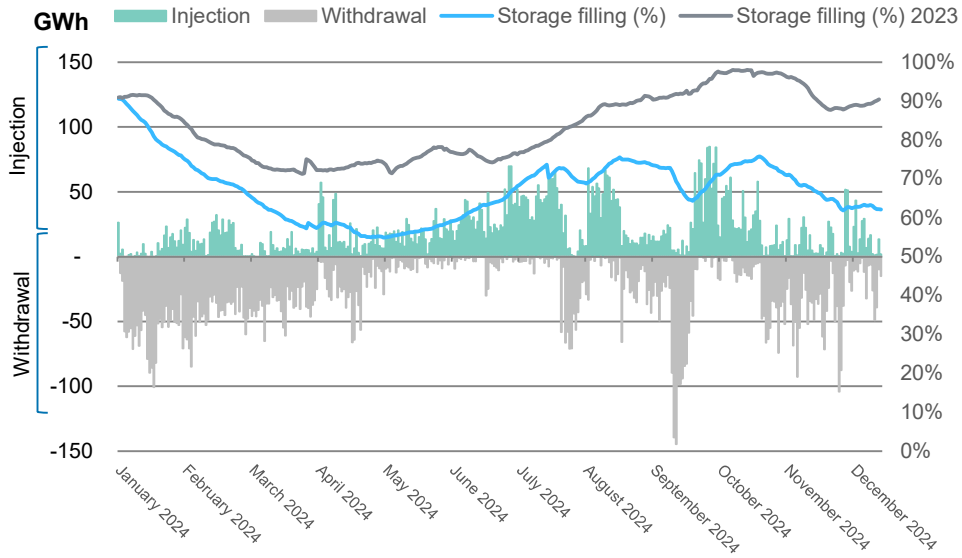
The Danish heating season typically runs from 1 October to 31 March. During this period, there is generally a net withdrawal of gas from storage to meet heating demand. During the rest of the year, there is generally a net injection into storage, the so-called injection season.

As illustrated in Figure 15, Danish gas storages had a filling level of 90.7 percent on 1 January 2024. The filling level declined during the start of the year until April, then gradually increased from early May until the latter part of July. In late summer, there was an unusually high withdrawal from storage, resulting in a fluctuating filling level for the remainder of the injection season[12]. This was mainly due to maintenance of the Norwegian Gassco EPII, during which there was no import of Norwegian gas. From mid-October, the filling level declined again to meet heating demand.

In contrast to Danish storage filling, the filling level in Germany and the EU as a whole increased fairly continuously from mid-April to the end of October, then decreased until the end of the year. This pattern was more in line with typical seasonal trends.

In 2022, the EU passed regulation requiring gas storages in the EU to have a minimum filling level of 90 percent by November 1. As a result of the unusually high withdrawals in late summer, Denmark failed to meet the target in 2024, reaching only a filling level of 75 percent.

FIGURE 15 | **STORAGE FILLING, INJECTION, AND WITHDRAWAL, 2024**



Source: The Danish Utility Regulator, using data from Gas Storage Denmark (GSD), provided through Energi Data Service and Gas Infrastructure Europe (GIE).

3.2.1.5. Regulatory development

DUR has published several decisions in 2024. In June, DUR approved an adjustment to its previous decision on the establishment of a joint market zone for Denmark and

[12] Source: Energinet, available at: link (in Danish)

Sweden, including the integration of the offshore section of the Baltic Pipe into the transmissions system. The decision on the method for the joint market zone is amended so that the reference to the repealed Executive Order on economic regulation of Energinet.dk, effective from 1 January 2025 is removed and replaced with a reference to the applicable executive order on revenue cap and regulatory accounts for transmission system owner. In August, DUR certified Gas Storage Denmark as the national natural gas storage system operator for the natural gas storage facilities in Lille Torup and Stenlille. In September, DUR approved a new methodology establishing the emergency supply tariff for non-protected gas customers.

Additionally, between June and September, DUR concluded its re-examinations and issued decisions on a number of complaints regarding the tariff level in the Danish offshore system. In April 2020, the Danish Western High Court ruled on a case regarding the setting of tariffs for transportation in the Danish offshore system during the period from July 2011 to October 2012. The High Court invalidated previous decisions by DUR and the Danish Energy Board of Appeal. As a result, DUR re-examined both the original complaint and additional complaints related to the offshore tariff level, and issued new decisions.

3.2.1.6. Important events in 2024

In 2024, one major event in the Danish wholesale gas market was the reopening of the Tyra production platform, which had been undergoing maintenance since 2019. Due to unexpected technical problems, the ramp-up was delayed. The platform reached full production on 3 March 2025, but shortly after, operations continued at a slower pace due to further technical issues. At full capacity, Tyra is expected to supply up to 2.8 billion m^3 of gas per year to the Danish/Swedish gas market.[13]

Moreover, another important development in 2024 was the adoption of the *Directive (EU) 2024/1788* and *Regulation (EU) 2024/1789 on 13 June 2024*, both of which entered into force on 4 August 2024.

Another event in 2024 was Denmark's failure to meet the EU storage regulation target, which requires Member States to reach a minimum storage filling level of 90 percent by November 1, 2024. The primary reason for this was reduced capacity due to maintenance work, which lead to higher than usual gas storage withdrawals in late summer.[14]

Lastly, on 20 December 20 2024, Germany's parliament agreed to exempt foreign buyers who export gas from Germany from paying the domestic levy, with effect from 1 January 2025. The background for the decision was to facilitate gas flows through alternative routes following the cessation of Russian transit via Ukraine by the end of the

[13] Source: Total Energies, available at: link

[14] Source: Energinet, available at: link (in Danish)

year. This made it less costly for Danish shippers, among others, to import gas from Germany.

TABLE 2 | **IMPORTANT EVENTS IN THE DANISH GAS MARKET IN 2024**

21 May 2024	The Tyra production platform reopens after maintenance since September 2019. Find out more here.
4 August 2024	*Directive (EU) 2024/1788* and *Regulation (EU) 2024/1789* are adopted on 13 June 2024 and enter into force on 4 August 2024.
1 November 2024	Denmark fails to meet the EU gas storage filling regulation target for 2024.
20 December 2024	Germany's parliament agrees to exempt buyers transiting gas through Germany from paying the domestic levy, with effect from 1 January 1 2025.

3.2.1.7. Focus areas for 2025

In 2025, DUR will focus on several key areas within the wholesale gas market. Firstly, DUR will monitor the implementation of the *Directive (EU) 2024/1788* and *Regulation (EU) 2024/1789* in Denmark. The directive will apply from 5 August 2026, while the regulation will apply from 5 February 2025. A particular focus for DUR in 2025 will be contributing to the implementation of a framework for developing a hydrogen market in Denmark.

Another focus area for 2025 is the development of plans to phase out Russian gas imports to the EU. On 6 May 2025, the Commission announced a legislative proposal to phase out remaining gas imports to the EU by 2027. The proposal will not have direct effects on Denmark, since the country does not import gas from Russia. However, due to the integrated European gas market, with the Danish gas price closely correlated with other European price hubs, the phasing out of Russian gas is likely to have an indirect effect. For example, further increased reliance on LNG imports to the EU could have implications for Danish gas prices levels and price volatility. Hence, DUR will monitor the effects of the legislative proposal on the Danish wholesale gas market.

In 2025, DUR will also monitor the development of the economic incentives for gas storage and capacity bookings at Danish gas storage facilities, which are important for Danish security of supply during the heating season. The interest in purchasing gas storage capacity at Gas Storage Denmark storage facilities has recently been declining. As of June 2025, less than half of the Danish storage capacity was booked for the 2025/26 storage year. The development can be explained by the narrowing of the summer- winter price spread, which has negatively affected the economic incentive to store gas.[15]

[15] Source: Gas Storage Denmark, available at: link

BOX 3 | **WHOLESALE GAS: FOCUS AREAS FOR 2025**[16]

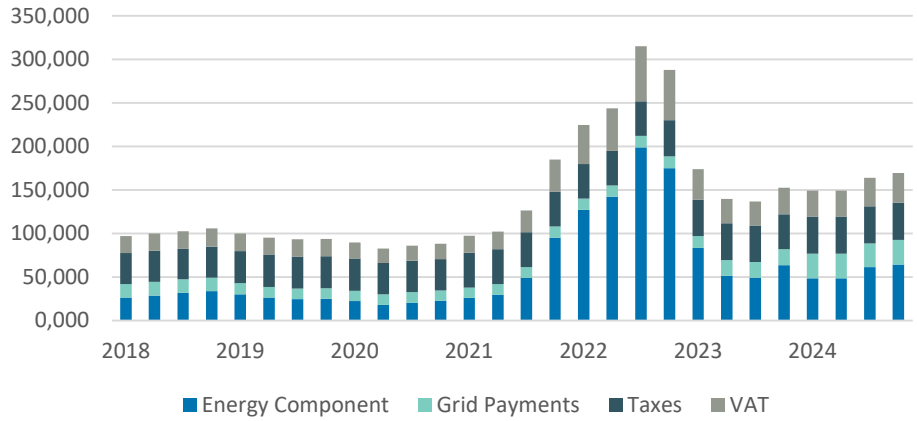
- DUR will monitor the implementation of the new *EU Gas Directive (2024/1788)* and *Regulation (EU) 2024/1789*, with particular focus on contributing to the implementation of a framework for the development of a hydrogen market in Denmark.
- DUR will monitor plans to phase out remaining gas imports to the EU and their implications for and effects on the Danish wholesale gas market.
- DUR will continue to monitor economic incentives for gas storage and storage capacity bookings in 2025.

3.2.2. Retail gas market

3.2.2.1. Retail gas prices

In 2024, the average total gas price for retail consumers (both household and non-household) was 157.9 cEUR/m^3, representing an increase by 4.9 percent compared to 2023, when the price was 150.6 cEUR/m^3, cf. Figure 16.

FIGURE 16 | **RETAIL GAS PRICES FOR CONSUMERS, 2017-2024**



Source: The Danish Utility Regulator

[16] DUR's latest comprehensive annual work plan for the upcoming three years covering electricity, gas, district heating, and waste was published in December 2024 and is available via this link (in Danish).

3.2.2.2. Market competition

A supplier-centric model for the gas retail market was introduced with effect from 1 April 2023. Four new and/or revised executive orders regulating the conduct of gas suppliers in the retail market entered into force at the same time.

In 2024, there were thirteen suppliers offering natural gas products to the approximately 360,000 retail gas consumers in Denmark. As of 1 April 2023, the Danish gas retail market adopted a structure mirroring that of the electricity retail market. This means, for example, that consumers must actively choose a gas supplier, which is then obliged to supply gas to them, and that a default supplier is no longer appointed by the Danish Energy Agency (DEA). If a gas supplier goes bankrupt, their retail customers will automatically be transferred to another supplier by the relevant DSO.

Consumers can choose between two types of gas products: fixed-priced products and variable-price products – both are market-based. Based on the latest available data from, most retail consumers in Denmark (approximately 94 percent) have a market-based product.[17]

Following the introduction of a new structure for the gas retail market, DUR determines the price of a product to which customers will be transferred in the event of their gas supplier's bankruptcy. The price must be determined and announced no later than 1 December each year.

Box 4 provides a summary of the areas where DUR will focus its monitoring efforts within the retail gas markets in 2025.

[17] DUR no longer compiles data on this. The latest available update is from 2017.

3.2.2.3. Focus areas for 2025

BOX 4 | **RETAIL GAS MARKET: FOCUS AREAS FOR 2025**[18]

- In 2025, DUR will continue to monitor gas suppliers' conduct and compliance with their obligations under the regulatory framework, including the publication of product information (including terms and prices) on their websites, as well as the reporting of such information to the price comparison tool (PCT) for the gas retail market, *Gasprisguiden*.
- DUR assumed responsibility for the ownership and operation of the PCT on 1 April 2023. In 2025, DUR will continue to adjust and upgrade the tool, where appropriate, in view of the Danish government's stated goal to phase out the use of gas for heating private dwellings by 2035.
- Expansion of planned supervision of compliance with the regulatory framework governing gas suppliers' conduct towards consumers in the Danish retail gas market.
- Contribution to the implementation of *Directive 2024/1788* on renewable gas, natural gas, and hydrogen.

4. Network regulation and technical functioning

4.1. Electricity

4.1.1. Unbundling of DSO
Legal basis: Articles 35 and 59(1) (j)

The requirements of the *Electricity Directive* regarding the legal and functional unbundling of vertically integrated Distribution System Operators (DSO) are transposed into the *Danish Electricity Supply Act* and relevant executive orders issued pursuant to the act.

In terms of the separate identity of vertically integrated DSOs, the regulatory framework has been in place since 2017, and DUR has monitored continuous compliance since that time.

In Denmark, the unbundling requirements apply to vertically integrated DSOs with more than 100,000 connected consumers.[19]

[18] DUR's latest comprehensive annual work plan for the next three years covering electricity, gas, district heating, and waste was published in December 2024 and is available via this link (in Danish).

[19] This is in accordance with the exemption provisions in *Article 26(4) of the Electricity Directive 2009/72* and *Article 35(4) of the recast Electricity Directive 2019/944*.

DSOs are obliged to complete an annual compliance programme and submit this to DUR, along with a report describing the measures carried out to ensure fulfilment of the unbundling requirements, cf. *Article 26(2)(d)*. DUR monitors the extent to which the DSOs comply with these rules.

New and stricter competence requirements for management and senior employees entered into force on 1 January 2024. The requirements have been expanded to ensure the competence of management and senior employees in relation to a wider range of companies, and new rules on organizational structures were introduced to strengthen the independence of grid companies and mitigate conflicts of interest. Furthermore, new provisions were introduced to ensure the independence of management and senior employees from conflicting business interests.

Effective from 1 July 2024, grid companies are required to publish and submit to DUR a report detailing their agreements with affiliated undertakings. The aim of this requirement is to increase transparency,

4.1.2. Transmission and distribution tariffs, connection, and access to networks
Legal basis: Articles 59(1) (a), 59(1) (o), and 59(7)

Common to transmission and distribution:
The *Electricity Supply Act* was last amended I December 2021, making cost-effective feed-in tariffs for production facilities and geographical differentiated tariffs legal.

To prevent cross subsidisation of costs between activities, the companies must comply with the rules regarding entity unbundling, accounting unbundling and management unbundling.

Specific to transmission:
In 2024, the DUR prepared to make decisions for insignificant supply quality, these decisions are expected to be made in 2025. The decisions will lead to one-year adjustments to the net companies supply quality for 2023. It was decided that in the future the net-companies' supply quality will be calculated based on their non-delivered energy to electricity customers in general, as well as the frequency and duration of outages for electricity customers at the individual customer level.

The DUR also prepared for the implementation of a new electrification surcharge, which is expected to apply to the revenue framework from 2025 and forward. The purpose of having surcharge options will provide the electricity gird companies with a revenue framework to be able to handle the increased need for electrification in society.

In 2024, the DUR began using external consultants for technical assessments of the investments that the electricity grid companies apply for to have their revenue frameworks increased.

In 2024, the DUR prepared the basis for determining the first framework for Energinet's electricity transmission business based on their activities for 2023. Draft decisions were subject to consultation in 2024, and the determination of the revenue is expected to be

completed in during the first three months of 2025. Efficiency requirements and preliminary revenue for the framework was issues in 2024.

As part of the determination of the revenue framework for Energinet's electricity transmission business, a draft standard life and operating equivalents for the electricity transmission business's fixed assets have been announced, which will be finally determined in connection with the determination of the revenue framework for 2023.

In 2024, DUR engaged in extensive dialogue with Energinet regarding the method for charging electricity producers connecting to the upcoming Energy Island Bornholm. The method was first submitted by Energinet in October 2023, subsequently withdrawn, and resubmitted in revised form in December 2024. In January 2025 external factors prompted Energinet to withdraw the method for the time being, and consequently DUR did not approve the submission.

Specific to distribution:
In 2024 a new executive order was written regarding revenue cap, though will not be implemented till 2025. Three paragraphs were added to the existing executive order[20]. These are *Article 25*, concerning changed activity level indicators. And *Article 31* and *Article 33* in regards to expansion and reinforcement of the grid at high and medium voltage levels. The paragraphs were added to implement green surcharge meant to cover additional costs related to electrification and adaptation to additional consumer needs.

DUR approved four revised methods proposed by four individual electricity network companies for calculating producer payments in the electricity distribution grid.

The methods, which replace the previously approved approach from July 2022 based on Green Power Denmark's industry guideline, introduce greater transparency and responsiveness to local grid conditions.

A key feature of the revised methods is the weekly update of "geozones" – areas classified according to their balance between electricity production and consumption. These zones directly influence the connection charges producers must pay when connecting new installations. Unlike the earlier system, which updated geozones annually, the new approach reflects changes in grid conditions more frequently.

In addition, the electricity network companies will publicly disclose the remaining capacity in each geozone before a category shift occurs. This will allow producers to assess whether a zone is close to reclassification – information expected to improve predictability and planning for new projects.

DUR found that, despite deviations from the industry guideline, the revised methods meet the legal requirements for cost-reflectiveness, transparency, and long-term system efficiency. However, the approval is subject to specific conditions: the electricity network

[20] The Executive order can be found here: link

companies must publish consistent and up-to-date information on zone classifications and capacities both on their own websites and on Green Power Denmark's geozone map.

The methods are approved until the end of 2026, in line with the validity period of the current industry guideline.

4.1.3. Implementation of network codes and guidelines, cross-border issues, and CM
Legal basis: Article 59(7) and (10)

In relation to electricity balancing (Article 59(7) (b)):
In 2012, DUR approved the basic principles of recovery of balancing costs and the principles for the settlement of imbalances used by the Danish TSO.

The Nordic TSOs are developing a Nordic Balancing Model (NBM) for the exchange of balancing capacity and energy, and for imbalance netting, in parallel with the implementation of *Commission Regulation (EU) 2017/2195 of 23 November 2017 establishing a guideline for electricity balancing (EB GL)*. An element of NBM is the merger of the Nordic balancing market for energy with the future European platforms for balancing energy.

Denmark officially joined the European energy activation market PICASSO on the 11 October 2024.

Electricity producers hold balance responsibility for the electricity they produce at their own plants and are required to assign this responsibility to a Balance Responsible Party (BRP) if they wish another party to hold it.

Balancing costs are recovered from the market participants causing the cost or imbalance. From 1 November 2021, production and consumption imbalances were merged into a single imbalance. Previously there were three separate imbalances for production, consumption, and trade, each priced differently. The four Nordic TSOs decided to implement the new imbalance model in October 2019, in accordance with European legislation and the Imbalance Settlement Harmonisation Methodology (ISHM). The most notable change is that BRPs now face the same imbalance price regardless of the direction of their imbalance relative to the total imbalance of the system.

Energinet is a state-owned, non-profit, single TSO in Denmark. The primary aim is to ensure open and efficient operation, development of the overall infrastructure, and to provide open and equal access for all network users.

In relation to access to cross-border infrastructures, including the procedures for the allocation of capacity and congestion management (Article 59(7) (c)):
Denmark is a member of two capacity calculation regions (CCRs): Nordic and Hansa.

- Jutland/Funen (DK1) and Zealand (DK2)
- Jutland/Funen (DK1) and Sweden (SE3)
- Zealand (DK2) and Sweden (SE4)
- Internal Swedish bidding zones

- Finland and Sweden
- Internal Norwegian bidding zones
- Norway (NO4) and Finland (FL)
- Norway (NO2) and Denmark (DK1)
- Norway and Sweden

CCR Hansa comprises the electricity transmission lines between:

- Denmark (DK1) and Germany (DE)
- Denmark (DK2) and Germany (DE)
- Denmark (DK1) and the Netherlands (NL)
- Sweden (SE4) and Poland (PL)
- Sweden (SE4) and Germany (DE)
- Norway (NO2) and the Netherlands (NL)
- Norway (NO2) and Germany (DE)

Allocation of all day-ahead cross-border capacity follows the implementation of Single Day-Ahead Coupling (SDAC), pursuant to terms and conditions or methodologies developed in accordance with *Commission Regulation (EU) 2015/1222 of 24 July 2015 establishing a guideline on capacity allocation and congestion management (CACM GL)*. Flows and prices are determined through implicit auctions. Unused residual capacity in the day-ahead market is given to the intraday market.

Denmark also shares a bidding zone border with the United Kingdom via the Viking Link interconnector, where cross-border capacity is allocated through explicit auctions.

At five Danish bidding zone borders, financial transmission rights (FTRs) are issued through monthly and annual auctions. The borders are DK1-DK2, DK1-DE, DK2-DE, DK1-NL, and DK1-GB. The issuance of long-term transmission rights (LTTRs) between DK1 and GB commenced in 2024, following the start of Viking Link operations between DK1 and GB at the end of 2023.

Key action under EB Regulation[21] in 2024:
In 2024, DUR undertook key actions concerning the scope of the *Commission Regulation (EU) 2017/2195 of 23 November 2017* establishing a guideline on electricity balancing (the EB Regulation):

On 19 December 2024, DUR approved Energinet's method for a new design for imbalance settlement with market participants, pursuant to *Article 18* of the EB Regulation. The new design for imbalance settlement incorporates both mFRR and aFRR balancing energy prices, rather than solely mFRR balancing energy prices, as a result of Energinet's connection to PICASSO in October 2024. The imbalance settlement for mFRR balancing energy volume has also changed to include the ramping period.

On 28 October 2024, DUR approved Energinet's method for a trilateral mFRR capacity market involving Finland, Sweden and Denmark pursuant to *Article 33(1)* and *38(1)* of

[21] *Commission Regulation (EU) 2017/2195 of 23 November 2017* establishing a guideline on electricity balancing

the EB Regulation. The new method establishes an mFRR capacity market with common and harmonised rules and processes for the exchange and procurement of mFRR balancing capacity, as well as a market-based allocation process for the exchange of mFRR balancing capacity among Finland, Sweden, and Denmark.

On 30 September 2024, DUR approved Energinet's amended method for payments to market participants for delivering aFRR balancing energy, pursuant to *Article 18* of the EB Regulation. The amendment follows Energinet's connection to PICASSO in October 2024.

There have been no key actions undertaken in the following areas during 2024: CACM, FCL, SO GL[22], ER NC[23],DCC NC[24], RfG NC, and HVDC NC[25]

4.1.4. Development of a reliability standard
Legal basis: Article 25, EU Regulation (EU) 2019/943

DUR in 2024 proposed a national reliability standard aimed at supporting the introduction of a capacity mechanism to secure electricity supply in Denmark. This initiative follows requirements set out by the Danish Energy Agency and complies with *EU Regulation (EU) 2019/943* on the internal market for electricity.

The main focus of the proposal is to set a reliability standard of 1.51 hours per year, which represents the maximum allowable duration of electricity supply interruptions due to insufficient capacity.

To operationalise this standard, DUR has defined parameters based on recent European resource adequacy assessments, particularly Scenario A of the European Resource Adequacy Assessment (ERAA). These parameters include expected values for energy not served and the loss of load expectation, which help quantify the risk and severity of capacity shortages. The proposal also considers economic factors such as the Value of Lost Load (VOLL), estimated at 174 DKK per kilowatt-hour, and the Cost of New Entry (CONE), which reflects the cost implications of capacity failures and new investments in generation capacity.

The methodology behind the proposal aligns with guidelines from the Agency for the Cooperation of Energy Regulators (ACER) and has undergone a public consultation process to ensure transparency and stakeholder input. Overall, the proposed reliability

[22] *Commission Regulation (EU) 2017/1485 of 2 August 2017* establishing a guideline on electricity transmission system operation.

[23] *Commission Regulation (EU) 2017/2196 of 24 November 2017* establishing a network code on electricity emergency and restoration.

[24] *Commission Regulation (EU) 2016/1388 of 17 August 2016* establishing a Network Code on Demand Connection.

[25] *Commission Regulation (EU) 2016/631 of 14 April 2016* establishing a network code on requirements for grid connection of generators and *Commission Regulation (EU) 2016/1447 of 26 August 2016* establishing a network code on requirements for grid connection of high voltage direct current systems and direct current-connected power park modules.

standard and related parameters aim to balance the need for security of electricity supply with cost efficiency, and alignment with EU regulatory frameworks.

4.1.5. Regulatory supervision of tariff methodologies and their application
Legal basis: Article 31, EU Regulation (EU) 2019/944

DUR's supervision of network companies' compliance with approved tariff methods
On 4 December 2024, DUR announced the initiation of a supervisory review focused on ensuring that electricity network companies comply with approved tariff methodologies.

The purpose of this oversight is to confirm that network companies charge tariffs in accordance with the methods approved by DUR, and that these methods appropriately reflect the actual costs associated with electricity transmission.

DUR emphasises the importance of transparency in tariff-setting to prevent unjustified costs being passed on to electricity consumers. The initial phase of the supervision will involve verifying whether all network companies have published their current tariff methods and tariffs on their websites. This verification process is expected to be completed by the end of 2024.

In 2025, the supervision will be extended to include an assessment of how these methods are applied in practice, including a review of Energinet's implementation. The findings from these supervisory activities will form the basis for evaluating the ongoing supervisory strategy within DUR's risk-based framework.

DUR highlights that there is currently no indication that network companies are failing to comply with the approved methodologies. Nevertheless, the supervision is crucial to ensure tariff accuracy and fairness for all electricity consumers, and to maintain trust in the electricity market.

DUR's periodic assessment of the potential of bidirectional electric-vehicle charging
On 1 July 2024, DUR announced that while bidirectional electric-vehicle charging (Vehicle-to-Grid, V2G) technology is still in its early stages and not widely adopted today, it could become a powerful tool in the future. By 2050, V2G has the potential to reduce both consumer and system costs, and to significantly boost the integration of renewable electricity into the grid. Bidirectional charging allows EVs not only to draw power from the grid, but also to return surplus energy – whether back to the grid or to a household.

This flexibility could benefit individual consumers and enhance market liquidity, thereby supporting broader electrification efforts in the energy sector. However, the realisation of these benefits hinges on technological advancements and widespread deployment of V2G-capable vehicles, a development still characterized by considerable uncertainty.

DUR will reassess the potential of V2G every three years, in line with the requirements of a new EU regulation on alternative fuel infrastructure. This periodic evaluation aims to determine whether V2G can effectively reduce costs for users and the system, and facilitate increased use of renewable energy in Denmark's power grid.

4.2. Gas

4.2.1. Balancing services
Legal basis: Article 41(6) (b)

The European network code on balancing (NC BAL)[26] required national implementation by 1 November 2015.

The network code was implemented in Denmark on 1 October 2014 (early implementation), introducing market-based balancing. The gas exchange EEX serves as the trading platform for the within-day product (title product) for daily balancing.

Denmark has a Joint Balancing Zone (JBZ) with Sweden. The main purpose of the JBZ is to enhance the efficiency of cross-border trade between the Swedish and Danish markets and to harmonise balancing procedures. Establishing a borderless Danish-Swedish balancing zone is expected to improve competition in the overall region. The creation of one JBZ for Sweden and Denmark will simplify balancing, increase the security of supply, and possibly attract more gas traders to the joint market.

On 6 December 2021, DUR (and Ei in parallel) approved a new balancing methodology for the Danish-Swedish JBZ. The new methodology took effect from 1 October 2022 and introduced within-day obligations along with the underlying data model, and the concepts of Smoothing and No Punishment Principle. The necessity for these changes stemmed from the establishment of the Baltic Pipe, which has greatly increased gas flows through the JBZ.

4.2.2. Monitoring and reviewing the access conditions for storage, line-pack, and other ancillary services
Legal basis: Article 41(1) (s) (n) and (6)

According to the *Danish Gas Supply Act*, there is negotiated access to natural gas storage and line-pack in Denmark. There is no price regulation under the *Danish Gas Supply Act*, but DUR still has a legal obligation to ensure that third party access to storage is provided in a manner that is transparent, non-discriminatory, and objective, including the way in which tariffs are set.

The Danish storage company, Gas Storage Denmark A/S, is a wholly owned subsidiary of the Energinet Group and operates two physical storage facilities in Denmark. In 2024, the combined maximum storage capacity ranged from 9.82 to 10.37 TWh[27]. The two storage facilities are operated as a single virtual commercial storage point, and Gas Storage Denmark sells its storage capacity on a first-come-first-served basis, and via auctioning.

[26] *Commission Regulation (EU) No 312/2014 of 26 March 2014* establishing a Network Code on Gas Balancing of Transmission Networks

[27] Source; Gas Storage Denmark, available at: link

4.2.3. Model criteria for access to storage
Legal basis: Article 41(1) (s) (n)

Gas Storage Denmark has, in accordance with the Danish Subsoil Act, been granted the exclusive right to store natural gas in the Danish subsoil at the gas storage facilities in Stenlille and Lille Torup. Although Gas Storage Denmark holds the exclusive right, and thus has a monopoly on storing natural gas in the Danish subsoil, access to gas storage is not regulated. Access to purchase storage capacity is obtained either through bilateral negotiations or at auctions.

DUR monitors the criteria supporting the choice of negotiated access. Competition, access conditions, or product choices/prices should not develop in a way that does not reflect expected market behavior. If it rather seems to reflect the monopoly situation in the Danish storage market, DUR will approach the legislator to discuss whether the access regime should continue to be negotiated, or whether it should be changed to a regulated access regime.

The Danish Utility Regulator has, in connection with the tariff methodology decision of 12 May 2022, and in previous tariff methodology decisions, approved a 100 percent discount on the transmission tariff to and from the natural gas storage facilities. According to *Article 17(3)* of *Gas Market Regulation 2024/1789*, a requirement is introduced that a tariff discount may only be maintained from 1 January 2026 if the discount enhances security of supply. The Danish Utility Regulator expects to make a decision shortly confirming that the tariff discount may continue beyond this date, as the regulator assesses that the discount contributes to increasing the security of supply.

4.2.4. Network and tariffs for connection and access
Legal basis: Article 41(1) and (6)

<u>In relation to transmission:</u>
Denmark has no LNG (Liquefied Natural Gas) terminals, and consequently, the following applies only to gas transmission.

- On 12 May 2022, DUR partially approved the notified tariff methodology, continuing, among others, uniform tariffs (“postage stamp” method).
- On 24 September 2024, DUR approved an add-on to the tariff methodology for the service of supplying gas in a state of “Emergency” relevant for non-protected gas consumers. The decision replaced the time-limited decision from 30 September 2022.

In 2024, the DUR prepared the basis for determining the first framework for Energinet’s gas transmission business based on their activities for 2023. Draft decisions were subject to consultation in 2024, and the determination of the revenue was set on 20 of March 2025. Efficiency requirements were decided, and the preliminary allowed revenue was issued for 2025 before the end of 2024.

With the completion of the Baltic pipe project, connecting Norway to Poland through Denmark, the cost base and usage of the gas-transmission system have increased. Together with the implementation of revenue cap regulation and the common market zone

there is expected to be a greater focus on transparency and regulatory certainty for both shippers and the TSO.

The executive order for Energinet's gas transmission business was updated in 2024.

In relation to distribution:

- *Approval of Evida's harmonised gas distribution tariffs*

In November 2024, DUR approved Evida's new tariff model, which introduces harmonised gas distribution charges across Denmark, linked to the merger of Evida Nord, Syd, and, Fyn on 1 January 2025.

The tariff model simplifies the structure into a uniform "postage stamp" tariff. This "postage stamp principle" ensures that producers and consumers pay the same price for the same service, regardless of location.

The model also prepares Evida for declining household gas demand as part of the green transition, including the introduction of a capacity-based system tariff on both the producer and consumer sides. It ensures fair, cost-reflective treatment for all users – including biomethane producers – while supporting the green energy transition.

- *Decision on exemption from the tariff discount pursuant to Article 18(5) of the Gas Regulation*

In connection with DUR's approval of Evida's harmonised gas distribution tariff, DUR made a separate decision, granting Evida a full exemption from applying tariff discounts for producers of renewable and low-carbon gas. The exemption was granted in accordance with the *EU Regulation (EU) 2024/1789 on the internal markets for renewable gas […] Article 18(5)*.

An exemption from *Article 18(1)* of the regulation means that Evida may refrain from applying a tariff discount to producers when renewable gas is injected into the natural gas distribution network. Consequently, all producers of biomethane will be required to pay for the costs attributable to their injection of biomethane into the distribution network. If DUR had not granted Evida an exemption under *Article 18(5)*, these costs would have to be passed on to other users of the distribution network, primarily consumers.

According to *Article 18(5)* of the Regulation, exemptions from applying tariff discounts may be granted for the injection of renewable gases into the natural gas network. Such exemptions can be based on criteria such as undue cross-subsidisation, the rollout of biomethane, and the existence of alternative support schemes.

4.2.5. Cross-border infrastructure, allocation, and CM
Legal basis: Article 41(6) (c), (8), (9), (10), and (12)

In 2023, the Danish Congestion Management Procedure (CMP) instruments were not used, although several instances of contractual congestion at the Entry North Sea Point, which connects the Danish transmission system with the Norwegian upstream system.

The Danish TSO, Energinet, has informed that network users in these cases utilised interruptible over nomination to acquire capacity. Energinet has not been able to provide further information about these events. DUR has emphasised that Energinet is obliged to provide such information, and will continue to monitor the situation.

From March 2024, the German TSO, Gasunie, significantly increased its import capacity from Denmark. The increase continued gradually during the year, and is expected to remain at a similar magnitude in 2025[28].

4.3. Electricity and gas

4.3.1. Security and Reliability standards

Legal basis: Electricity Directive, Article 59(1) (m); Gas Directive Article 41(1) (h)

There are several arrangements in Denmark that support the security and reliability of the electricity and gas system. Energinet provides information on its activities pertaining to:

- Performance of scheduled maintenance work
- Revision of maintenance systems or procedures
- Reporting of incidents in the transmission network due to third party interference
- Provision of data to ENTSO-E and ENTSO-G for preparation of e.g., ENTSO-E Winter and Summer Outlook Reports
- Monthly reports for operations and projects
- Provision of plant maintenance reports created in SAP; the ERP system used by Energinet Asset Management system at Energinet in accordance with the PAS55 standard

There have been no changes to these standard activities in 2024. However, in 2025, a new law was made on emergency preparedness in the utility sector.

4.3.2. Monitoring time for connection and repair

Legal basis: Electricity Directive, Article 59(1) (q); Gas Directive, Article 41(1) (m)

DUR holds quarterly meetings with Energinet on regulatory issues, including monitoring tasks. DUR also requests annual written reports from Energinet on connection and repair.

Based on annual reports from Green Power Denmark, DUR monitors the time taken by the DSOs to make connection and repair. The annual benchmarking of DSOs includes the duration and frequency of interruptions.

[28] Source: Gasunie, available at: link

4.3.3. Coordination and cooperation

Legal basis: Electricity Directive, Article 59(1) (f)
Gas Directive, Article 41(1) (c)

In accordance with *Article 59(1) (f)*, DUR cooperates with ACER and other national regulatory authorities (NRAs) on cross-border issues, in particular through participation in the work of ACER's Board of Regulators pursuant to *Article 21 of Regulation (EU) 2019/942*. In the second half of 2024, DUR held the presidency of the European Union. Furthermore, DUR cooperates with the other Nordic regulators within Nordic Energy Regulators (NordREG).

On 1 July 2022, the Nordic Regional Coordination Centre (RCC) was established in Copenhagen as one of six regional centres in Europe with the aim of optimising the operation of the European electricity system, both in terms of security and capacity utilisation. The establishment of the RCC is part of the implementation of EU legislation based on the Clean Energy Package.

The RCC is owned by the four Nordic TSOs – Energinet (Denmark), Fingrid (Finland), Statnett (Norway) and Svenska Kraftnät (Sweden) – and will coordinate the operational planning of the entire Nordic power system.

The Nordic RCC will continue and expand activities that have so far been carried out by the Nordic Regional Safety Coordinator (RSC) since 2017.

In accordance with *Article 41(1) (c)*, DUR cooperates with ACER and other NRAs on cross-border issues, in particular through participation in the work of ACER's Board of Regulators, the ACER Gas Working Group, and ACER Task Forces.

DUR has continuous cross-border cooperation with Sweden to ensure an efficient supply of gas to Sweden, including a well-functioning JBZ, as Sweden has no indigenous natural gas production and no substantial gas storage or LNG facilities. Sweden depends entirely on Danish gas supplies for its annual domestic consumption of approximately 1 billion cubic meters per year. Security of supply is therefore a subject that requires continuous cooperation between the Danish and Swedish authorities and system operators. DEA is responsible for the security of supply in Denmark.

4.3.4. Monitoring TSO investment plans

Legal basis: Electricity Directive, Article 59(1) (k), (l)
Gas Directive, Article 41(1) (g)

The regulatory authority regarding the Danish TSO’s (Energinet) investments is divided between DEA and DUR.

DEA is responsible for the approval of Energinet’s investment plans, and for the approval of actual investments.

DUR is responsible for monitoring of Energinet's investment plans in the context of compliance with the community-wide ten-year network development plan (TYNDP). The community-wide TYNDP comprises projects of common interest (PCI projects), as well as other cross-border investment projects by Energinet. Energinet is responsible for preparing transmission investment plans and for submitting the plans to the Danish Ministry of Climate, Energy and Utilities (owner of Energinet) and to DUR for monitoring compliance and compatibility with the European TYNDP.

The monitoring process has revealed no discrepancies between Energinet's plans and the community-wide TYNDP.

4.3.5. Security of supply

Electricity

DEA is responsible for regulatory tasks relating to security of supply, including monitoring national networks, planning, and approving new grids of more than 100 kV.

In general, Denmark has a high degree of security of supply in the electricity sector. In 2023, the average Danish consumer experienced 29.7 minutes of interruption. In the last 10 years, Danish electricity consumers have experienced an average of 20 minutes of outages per year, corresponding to security of electricity supply of 99.994%.[29]

Natural gas

DEA is responsible for regulatory tasks relating to security of supply. DUR is responsible for approving methodologies in accordance with relevant law, and market monitoring.

In 2024, Denmark issued no national declarations of early warnings, alerts, or emergencies in Denmark. While gas withdrawals from Danish storage facilities were higher than usual in late summer due to maintenance activities, which contributed to Denmark missing the EU's storage filling target, the situation did not threaten Danish security of supply. Denmark is well-connected with the broader European gas market, which was generally well-supplied in 2024, with a high storage filling in Europe overall. Moreover, a large share of Danish gas consumption is covered by local biomethane production.

The Tyra platform in the Danish North Sea reopened in March 2024, but has experienced recurring technical issues since then. As of June 2025, the platform is still operating at reduced capacity.

The Danish and Swedish supply situation would only be endangered by the platform shutdown in the event of a prolonged cold winter spells or disruptions to gas supply on a European level. The Danish TSO, Energinet, has maintained its reserves for emergency volumes and withdrawal capacity in the Danish gas storage facilities.

[29] Source: Energinet – Redegørelse for elforsyningssikkerhed 2024, available at: link

Due to the uncertain supply of gas in 2022, Energinet also increased the procurement of filling restrictions from gas storage consumers. Filling restrictions oblige specific storage consumers to withhold gas in storage for a specific period of time. Energinet decreased the individual filling requirement in 2023, followed by a slight further decrease in 2024.[30]

4.3.6. Consumer protection and dispute settlement

Legal basis: Electricity Directive, Articles 10, 14, 18, and 59, and Annex I
Gas Directive, Articles 3 and 41(1), and Annex I

Contract information (Electricity and Gas):
The minimum requirements regarding compulsory information in an electricity or gas supply contract are as follows:

- The identity, address, and contact details of the supplier.
- The payment arrangements, delivery, performance, and the period during which the supplier undertakes to deliver the services.
- Duration of the contract, where applicable, or, if the contract is of indeterminate duration or is to be extended automatically, the conditions for contract termination.
- Where to find information about up-to-date applicable prices, fees, and tariffs is available.
- Whether the consumer can continue the contractual relationship with the supplier at a different delivery address and the terms for this.
- The supplier's deadline for final settlement.
- Information about who compensation and other remedies may be claimed for non-compliance with the contract, including, but not limited to, inaccurate and delayed billing.
- Information about complaints procedures and complaints handling.
- The terms of the contract must be fair, transparent and easily understandable, and must be provided to the consumer before entering into the contract.

The information requirements regarding electricity supply contracts in the *Electricity Directive 2019/944*[31] were implemented in *Executive Order No. 2648 of 2021 on electricity supply (Elleveringsbekendtgørelsen)*. This Executive order was replaced in January 2025 by *Executive Order 1728 of 30 December 2024*. Additional requirements will apply for 2025 and going forward. Additional adjustments of a consumer-protection nature are expected to be added with effect from the beginning of 2026.
The requirements regarding information in a gas supply contract in Annex I of the *Gas Directive 2009/73* were implemented in *Executive Order No. 340 of 2023 on gas supply (Gasleveringsbekendtgørelsen)*. Executive Orders for the electricity and gas retail market were issued by DEA, and contain explicit references to the information requirements

[30] Source: Energinet, available at: link

[31] *Directive 2019/944/EC* of the European Parliament and of the Council of 5 June 2019 concerning common rules for the internal market in electricity and amending *Directive 2012/27/EC*.

contained in the *Danish Consumer Contracts Act No. 1457 of 2013 (Forbrugeraftaleloven)*.[32]

Billing information (electricity and gas)
Suppliers are required to provide an itemised bill free of charge to the consumer, upon the consumer's request.

DUR monitors gas and electricity suppliers' compliance with the legal requirements concerning billing information[33]. Furthermore, *Executive Order No. 734 of 2022*[34] *on energy companies' and building owners' duty of disclosure to end-consumers* applied to electricity throughout 2024, and continues to apply to gas billing.

As part of the revision of *Elleveringsbekendtgørelsen* (effective as of 17 January 2025), the pertinent parts of executive order no. 734 from 2022 were incorporated directly into *Elleveringsbekendtgørelsen.*

Billing information (electricity)
Suppliers are responsible for all communication with consumers, including billing, following the implementation of the supplier-centric model in the Danish electricity market.

The legal minimum information requirements for electricity bills include:

- The total payment and consumption (kWh) in the billing period.
- Type of price (e.g. fixed or variable price) and the name of the product.
- Subscription fee to the supplier and the DSO.
- The total price in øre/kWh covering payment for electricity supplied, as well as grid and system services (transmission and distribution), and taxes, including VAT during the billing period35.
- The consumer's right to receive an itemised bill free of charge.

The itemised bill is intended to increase consumer awareness without overloading consumers with information, by providing an overview of the most significant price information, thereby facilitating consumers' active participation in the retail market.

Billing information requirements have, for some time, been governed by *Executive Order No. 1696 of 2020*. As mentioned earlier in this report, this executive order is currently undergoing revision, with the intention that the revised version of the executive order should enter into force on 1 January 2026.

[32] *The Danish Consumer Contracts Act No. 1457 of 2013* is non-energy-specific legislation, which regulates e.g. the minimum requirements regarding a trader's duty to disclose information before concluding a contract with a consumer. Pursuant to *Executive Orders No. 2648 of 2021 on electricity supply* and *No. 340 of 2023 on gas supply*, these requirements also apply to the compulsory information to be provided to a consumer in an electricity or gas supply contract.

[33] For electricity: See *Executive order no 1696 of 2020*. For gas: see *Executive Order No. 209 of 2023*.

[34] Link for more information: *Energioplysningsbekendtgørelsen* (retsinformation.dk)

[35] One øre is equivalent to DKK 0.01.

Billing information (gas)

Information requirements relating to gas bills contained in Annex I to *Gas Directive 2009/73* were implemented in *Executive Order No. 937 of 2006 on gas billing*, and updated by *Executive Order No. 209 of 2023*.

The option of issuing a combined gas bill was repealed with effect from 1 July 2023. The abandonment of combined gas bills followed the introduction of a supplier centric market scheme for gas in Denmark. Gas consumers therefore receive separate bills from their gas supplier and their gas DSO.

Consumer's access to consumption data (electricity)

No changes in 2024.

DataHub is an IT platform established and operated by Energinet. It handles data communication and business processes between market participants in the Danish electricity market.

Overall, three types of data collated in DataHub relate directly to consumers:

- Consumer-related master data (e.g. the consumer's name and address)
- Metering point-related master data (location address of the metering point, meter reading characteristics, meter reading frequency, settlement type, and metering point ID)
- Metering data (consumption data)

Consumers can access their data (i.e. consumer-related master data, metering point-related master data, and metered (consumption) data) in DataHub free of charge. Consumers can access the data either via the supplier's website by using MitID[36], or through the public website *Eloverblik.dk*, operated by Energinet. Data can be downloaded from *Eloverblik.dk* in an Excel file.

When a consumer enters into a supply contract, the supplier gains access to the consumer's data in DataHub relevant to the supplier.

Apart from the current a supplier, consumers control access to their data in DataHub. Third parties, e.g. a potential supplier with whom the consumer does not have a contractual relationship, can be authorised to access the consumer's data. Consumers can grant access to their data via the *Eloverblik.dk* website by using their MitID. The consumer can withdraw an authorisation granted at any time.

Consumer's access to consumption data (gas)

No changes in 2024.

Gas consumers' data is not collated in DataHub, which only covers the electricity market. Gas consumers can typically access their consumption data and related information via their gas supplier's website by using MitID.

[36] MitID is Denmark's official digital identification system, which provides secure electronic authentication and digital signing for residents, ensuring access to public authorities, financial institutions, and private service providers.

Electricity comparison tool
No significant changes in 2024.

The overall purpose of *elpris.dk* is to increase transparency and consumer awareness about products and prices in the Danish retail market for electricity, thereby enabling consumers to make an informed decision about which product to choose.

Pursuant to the *Danish Electricity Supply Act*[37], DUR is responsible for establishing and operating an online comparison tool for electricity products offered to consumers with an annual consumption of up to 100,000 kWh. In 2016, DUR established the public website and comparison tool, *elpris.dk*, which was revised and updated in January 2022.

Further adjustments and updates were planned for 2024. The design and development work proved more time-consuming than anticipated, and the changes will instead be introduced in the second half of 2025.

Gas comparison tool
No changes in 2024.

Information about all gas products and prices is available and comparable on the price comparison tool, *gasprisguiden.dk*. Energinet operated the comparison tool until 31 March 2023, while DUR had regulatory oversight of it.

DUR assumed responsibility for the price comparison tool (PCT) for the gas market on 1 April 2023.

Danish gas suppliers have a legal obligation to ensure that relevant and correct information about all their products, including prices and delivery terms, is published on their websites. They are also required to ensure that the same information is reported to, and available on the price comparison tool.

Electricity disconnection
DUR monitors electricity disconnection rates in Denmark. In 2024, 0.7 percent of instances of electricity disconnection were due to household consumers' failure to provide collateral.

In Denmark, electricity suppliers are not allowed to disconnect household consumers for non-payment of electricity already consumed. However, if a supplier has justifiable grounds to expect non-payment, it can request security for the continued supply. The legal minimum time between a request for security and disconnection depends on whether the household consumer is in arrears with payments to the supplier.

Consumer complaints handling
No changes in 2024.

[37] Link for more information: *Section 82 b(1) of the Danish Electricity Supply Act*.

DUR does not handle complaints arising from contractual disputes between consumers and suppliers. As a public authority, DUR has a duty to provide guidance on matters within its remit to any party that contacts the organisation.

Consumer complaints may be submitted to the private Energy Supplies Complaint Board (*Ankenævnet på Energiområdet*). The Energy Supplies Complaint Board (the "Board") handles all household consumer complaints regarding purchase and delivery of electricity, district heating, and/or gas.

Before submitting a complaint, the consumer must have attempted to contact the supplier and sought to resolve the dispute bilaterally. Failure to do so constitutes grounds for the Board to refuse the case.

When submitting a complaint, the consumer must pay a fee of DKK 160 (approximately EUR 22). This fee is refunded if the Board upholds the consumer's complaint. Energy companies must pay a fee of DKK 8,500 (approximately EUR 1,140) if the case is determined in favour of the consumer. If the case is closed with a settlement facilitated by the Secretariat of the Energy Supplies Complaint Board, the company must pay DKK 3,800 (approximately EUR 510).

In 2024, the average complaint-handling time was approximately 4.4 months (130.7 days).

Once the Board has reached a decision, either party may take the matter to the Danish courts. The Board's decisions are not legally binding or enforceable, however, compliance rates remain high. According to the 2024 Annual Report[38] of the Energy Supplies Complaint Board, energy companies in 2024 complied fully with the Board's decisions in 78.9 percent of cases, whilst passive compliance comprised 10.5 percent during the same period. The compliance rate declined compared to 2023, falling from 95.5 percent to 78.9 percent.

[38] More information regarding the Energy Supplies Complaint Board is available on the Board's website: link (in Danish only)