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## **Disrupted or Disguised? The Impact of the Russian Invasion of Ukraine on Discursive Contestations over the European Energy Transition**

- An actor-centered approach toward analyzing the conditions for discursive lock-in or change during critical junctures.

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## **Abstract**

To reach carbon neutrality by 2050, the EU currently relies on fossil gas as a so-called *bridge fuel*. This dominant discourse is increasingly being contested by voices from civil society and academia delegitimizing fossil gas as a dangerous *bridge to nowhere*. Using a process-oriented, discourse analytical approach, this thesis examines the evolution of the discursive field in the context of the *disruptive shock* posed by the Russian invasion of Ukraine and the energy crisis it triggered. For this purpose, this thesis presents a novel theoretical framework for examining the conditions under which a *disruptive shock* translates into a *critical juncture* for *discursive change*. The final analysis shows that despite the presence of a potentially disruptive event, the discursive outcome, i.e., the REPowerEU plan, represents a renewed discursive lock-in of gas. Hence, this thesis finds that a *disruptive shock* is not a sufficient condition for discursive change. Moreover, actors' *discursive agency* as well as their strategic responses, such as *narratives*, matter. Precisely, change was found to have been impeded by three closely interlinked *discursive lock-in mechanisms*: first, a continued failure of the challenger coalition to question *meta-discursive assumptions*; second, continued asymmetries in incumbents' and challengers' *discursive agency*; and third, the incumbent coalitions' strategic practice of *narrative co-optation*.

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## 1. Introduction

Over the past decade, the European energy transition towards climate neutrality has relied heavily on the use of fossil gas as a so-called *bridge fuel*. Accordingly, gas has been framed by incumbent powers in European energy policy as a partner to renewables and a cleaner solution than oil and coal (Szabo, 2022). Hardly any other quote illustrates the success of such framings as the statement by Germany's former Minister for Economic Affairs that "*gas is sexy*" (Kehler, 2019).

This dominant narrative is contested by energy scientists, NGOs, and social movements who all criticize gas's underestimated climate harms and accordingly frame gas as a *bridge to nowhere* (Howarth, 2014). Scholarly work has not only provided substantive evidence of the climate-damaging properties of fossil gas (Holz & Kemfert, 2020; Howarth & Jacobson, 2021), but has also started to examine the factors that encourage economies' continued reliance on it (Erickson et al., 2015; Fitzgerald et al., 2019; Kemfert et al., 2022). Transition scholars addressing the continued *lock-in* of fossil gas have mostly focused on institutional, material, and behavioral aspects that contribute to its persistence (cf. Seto et al., 2016). Only more recently, academics have called for a systematic inclusion of discursive perspectives into the study of carbon lock-ins (Buschmann & Oels, 2019; Simoens et al., 2022a). Exempting a few examples, research into discursive mechanisms of lock-ins remains scarce, especially concerning fossil gas. However, a discursive perspective can improve understanding of the gas lock-in because it "*links and aligns*" the institutional, material, and behavioral dimensions of the carbon lock-in (Buschmann & Oels, 2019, p. 11). This applies especially because the EU's goal to decarbonize "*has amplified the role of discourse as a medium through which actors seek to influence the socio-technological trajectory of the energy transition*" (Szabo, 2022, p. 2). Subsequently, unmasking the mechanisms through which energy discourses become locked-in is especially relevant for researchers, policymakers, and activists who seek to accelerate socio-technical transitions towards fossil-free societies. This is a task of paramount societal importance, considering the harms gas exploration poses to people and planet.

Fortunately, researchers have also identified contextual conditions under which discursive change is likely to occur (cf. Hajer, 1995; Hermwille, 2016). Simoens et al. (2022a, p. 1847) propose that one major pathway for institutional change is: "*[disruptive] discursive change resulting from exogenous events, such as natural disasters, that alter the values and assumptions of the meta-discourse*". It is the expectation of this thesis, that the "*global energy*

*crisis*” (Gaffen, 2023) accelerated by the Russian Invasion of Ukraine (RIOU) constitutes such a landscape shock.

A prominent approach to studying the conditions for institutional change following a disruptive event is provided by the Critical Juncture Theory (CJT). The CJT however focuses narrowly on the dynamics triggering changes within policy coalitions and less so on the spaces where counter-narratives originate and the factors that condition the probability of their adoption by policymakers. Building on Simeons et al. (2022a) proposition that discursive outcomes are shaped by the power of influential actors’ narratives as well as their discursive agency, this thesis explores a variety of theoretical perspectives exploring these two variables more profoundly. By integrating these perspectives into the CJT, this thesis builds an integrated theoretical framework that offers a more holistic approach to studying the process and conditions through which a disruptive discursive shock translates into institutional change. By applying the integrated theoretical framework to the topical case of the discursive contestation over the European Union’s energy-political response to the RIOU (i.e., the REPowerEU plan) this thesis not only contributes to filling the identified theoretical gap but furthermore produces new knowledge about the current state of discursive contestation over gas in the European Energy transition.

Accordingly, this thesis analyses “*in how far the Russian invasion of Ukraine has acted as a disruptive shock to the discursive contestations about the role of fossil gas in the European energy transition*”.

To structure this research more clearly, the following sub-questions will be investigated:

*Subquestion 1: How was the discursive field structured before the RIOU?*

This question is analyzed by comparing the two opposing discourse coalitions’ discursive agency and their respective narratives at the time before the RIOU.

*Subquestion 2: How has the RIOU affected the discursive field (i.e., actors’ narratives and their discursive agency)?*

To answer this question, the analysis focuses on whether the RIOU has been interpreted as a discursive event by both discourse coalitions, and whether it affected their discursive agency and narratives.

*Subquestion 3: How did (possible) effects on the discursive field initiated by the RIOU contribute to either reinforcing a discursive lock-in on gas or challenging it?*

By analyzing the REPowerEU plan for alignment with both discourse coalitions' narratives, this thesis can identify whether a renewed lock-in or change has occurred. By relating all three momentums' findings back to the theoretical framework, the role different factors had in shaping either possible outcome will be concluded.

The thesis will proceed in the following manner. First, the theoretical framework will be presented. At its beginning, the scientific field of transition literature will be introduced with specific regard to the recently emerged field of discursive lock-in studies. Next, the theoretical concepts of *narratives* and *discursive agency* will be introduced to the discussion, and the related mechanisms for *discursive lock-in* and *discursive change* presented. By integrating the two theoretical elements of *narratives* and *discursive agency* into the critical juncture framework, this thesis proposes a novel theoretical framework, building on state-of-the-art research from two related schools of discourse theory. Second, in the method section, the qualitative-interpretative research approach will be presented. This section furthermore includes a discussion of data collection & analysis. The empirical section, third, will discuss the analysis' findings and interpret them in accordance with the theoretical framework. Finally, the results will be discussed and concluded, providing insights into the role of discourse in European Energy politics.

## 2. Theoretical Framework

### 2.1 Introducing the Scientific Field: The Benefits of Integrating a Discursive Perspective into Transition Studies

In the scientific field of transition studies, the continuous stability of unsustainable production and consumption patterns is coined by the term *carbon lock-in*. The term refers to “*industrial economies [that] have become locked into fossil fuel-based technological systems through a path-dependent process driven by technological and institutional increasing returns to scale*” (Unruh, 2000, p. 817) and is accordingly traced back to the persistence of a dominant “*Techno-Institutional Complex*” (ibid.). The widely adopted approach by Seto et al. (2016) builds upon this notion and proposes a framework, which traces the carbon lock-in along three dimensions: infrastructures/technologies, institutions, and behavior.

More recently, scholars have argued that discourse is another aspect to consider when studying dynamics of stability and change. By tracing developments in the German *Energiewende* through a discursive lens, Buschmann and Oels (2019) show how discourse has affected the role assigned to different energy carriers in the German energy policy over the years. They

outline how the “*long-standing lock-in of fossil fuels and nuclear power was undermined by the rise of the energy transition discourse*” (*ibid.*, p. 1), but also note that while renewables have continued to grow, natural gas could defend its role in the German energy mix, despite its fossil nature. In her doctoral thesis, Brauers (2022) examines the lock-in of gas in Germany in more detail. In line with Buschmann and Oels (2019), she concludes that, next to techno-economic, institutional, and behavioral lock-ins, prominent bridge fuel narratives remain an important factor for gas’s persistent appeal. Both authors show that lock-ins between and across these different dimensions can be mutually reinforcing; a phenomenon termed as “interlock-in” by Simoens et al. (2022b, p. 17). For the European case, Szabo (2022) shows how incumbent powers have strategically altered bridge-fuel narratives over time to concur with the EU’s increasing focus on environmental protection. He thus describes the discursive *trasformismo* of the industry as a source of power, that by complementing their other (material and institutional) forms of power, has allowed for the continuation of natural gas exploitation under the EGD.

In summary, the discursive dimension rarely explains the carbon lock-in on its own. However, by introducing a poststructuralist perspective, it can offer an expanded understanding of socio-technical path dependencies as shaped by the formative power of socially constructed meanings. Consequently, it is the following sections’ purpose to outline the theoretical foundations, on which the discursive perspective builds and to introduce the mechanisms by which a dominant discourse itself can become locked-in or change.

## 2.2 Key Concepts

### 2.1.1 Discourse – The Basic Assumptions

To begin, discourses can be defined as “*an ensemble of ideas, concepts and categories through which meaning is given to social and physical phenomena, and which is produced and reproduced through an identifiable set of practices*” (Hajer & Versteeg, 2005, p. 175). Discourse therefore “*constructs meanings and relationships, helping define common sense and legitimate knowledge*” (Dryzek, 2013, p. 9). In this sense, discourses are not seen as merely descriptive of the world but are attributed with having a formative character of social and material realities (Foucault, 1988, p. 74; Keller et al., 2012). Hence, their relevance to the material, institutional and behavioral dimensions of the carbon lock-in.

### 2.2.2 Discursive Agency

This formative character however is not to imply “a one-way ticket”. Building on Giddens’ (1986) structuration theory, discourse scholars have called for a stronger consideration of agency in discourse research (cf. Leipold & Winkel, 2017), claiming that policy discourses

generally contain patterns of problematizations, problem solutions, and responsibilities (e.g., who is responsible for the problem, and who is required to or unable to act). It is specifically this latter category, which gives rise to a discursive agency in policy discourses (Keller 2012). “By constantly making choices about whether, where, when, and how to identify with a particular subject position in specific storylines within this discourse” (Leipold & Winkel, 2017, p. 524) actors can be seen as constitutive of discourses, just as much as a discourse can be regarded as constitutive of their own *subjectivation* (cf. Foucault, 1982) - a concept which is to be understood as a “*dialectic relationship between discourses and agents*” (Leipold & Winkel, 2017, p. 522).

According to the authors, there are three relevant dimensions that constitute an actor’s discursive agency. The first relates to individual characteristics which are “*rhetoric skills, diplomatic skills, intelligence, diligence, education, knowledge of an issue, commitment, experience*” (ibid., p. 524). The second dimension entails positional characteristics which include *an actor’s “credibility, mandate to act, material resources, ecological/social situation with which actors faced, connection to discursive structures”* (ibid., p. 525). Moreover, actors may actively engage in strategic practices targeted at influencing a dominant discourse’s trajectory. These include practices of political participation (thus relating to governance and organizational questions) and coalition building, but also the strategic production of narratives as well as actions aimed at strengthening one’s speaker position, e.g., by investing in one’s perception as a legitimate actor. Alternatively, actors may actively aim to weaken other actors’ discursive agency, by challenging their legitimacy and/or their respective narratives. Thus, in the most basic understanding, discursive agency traces back to actors’ abilities and capacities to exert discursive power.

### 2.2.3 Narratives

According to Simoens et al. (2022a) the most relevant strategy to promote a certain idea against another, is the strategic shaping and dispersing of *narratives*. Narratives are conceptualized as linguistic instruments of discourses and accordingly defined as a “*subset of overarching discourses [...] summarizing discourses into condensed stories [...] In doing so, narratives make complex issues and debates tangible and allow actors to transfer meaning structures.*” (ibid., p. 3). Scrase and Ockwell (2010, p. 2228) further argue that narratives are “*symbolic references that imply a common understanding of an issue [...] By uttering a specific word or phrase [...] a whole story-line is in effect re-invoked [...] They can thus act to define policy problems while obscuring underpinning interests, values and beliefs*”. Hence, narratives



establish the parameters for “*how situations are interpreted*”, how “*problems are perceived*”, and what is considered “*acceptable or desirable*” (Jager et al., 2022, p. 3).

To approach the study of narratives’ content, Wittmayer et al. (2019, p. 2) propose to focus on three core dimensions: rationale, actors and plot. The *rationale* is understood as a combination of the problem description and a conceptualization of the desired future. The pillar of *actors* then asks: Which actors are leading the way toward the desired future? What are the actors who are opposing the desired future Finally, the *plot* targets the question of how, so by which activities, the desired future can be achieved (cf. Schrandt, 2022).

A narrative’s chance to become popular then depends on several further characteristics which make it convincing, meaningful, and attractive (Simoens et al., 2022a). These characteristics relate to questions of how a narrative relates to dominant societal discourses and which activities actors engage in to construct their narrative in a way that makes it convincing (Simeons et al., 2022, p. 1845; Wittmayer et al., 2019, p. 3). An overview of such strategies is given in the table below. These characteristics are specifically what enable narratives to become convincing and be received well.

*Table 1: Discursive Strategies, adapted from Leipold & Winkel (2017: 526)*

Discursive Strategies	Description
rationalization via scientification	mobilizing and reinforcing available rational patterns in a discourse, e.g., by scientific claim making
emotionalization	mobilizing and reinforcing available emotional patterns in a discourse
delegitimation strategies	render an opponent’s narratives and practices inappropriate or wrong
re- and de-issuing	dropping or re-connecting problems or solutions in a discourse
exclusion strategies	the active foreclosing or passive non-reference to an agent, problematization, or solution
employing normative power	connecting concepts, agents or intentions (i.e., policies) with strong and generally accepted values.

Finally, Szabo (2022, p. 2) shows that narratives “*are malleable as actors and political coalitions reconfigure them according to the changing context and their respective objectives*”.

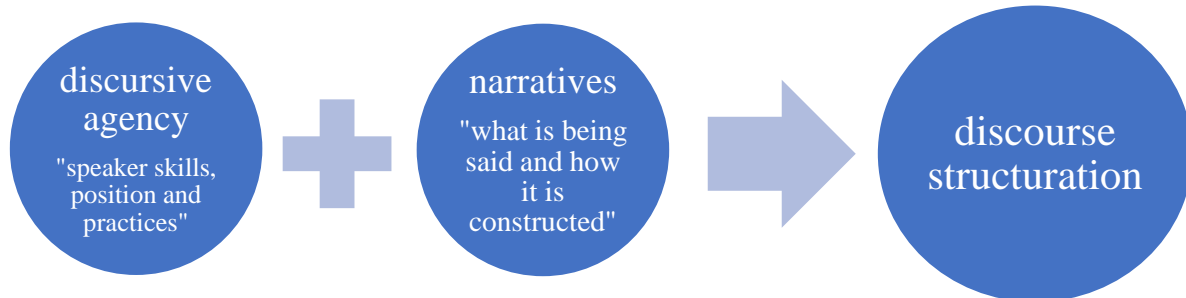
Metze and Dodge (2016, p. 2) accordingly propose that actors actively engage in so-called

“discursive boundary work” to demarcate their own narratives from others in order to gain support, credibility, and authority for a particular perspective.

#### 2.2.4 Discourse Structuration

In sum, actors can be regarded as continuously engaging in a competitive struggle over meaning (cf. van Assche et al., 2014). The process through which discourse fragments become meaningful and thereby modify discursive configurations has been coined “*re-signification*” by Fuchs and Graf (2010, p. 5), and in accordance with the Discursive Agency Approach, the authors state that the success of the re-resignification process depends on both the “*discursive power of the speaker as well as the reception of the articulation*” (ibid.). According to Hajer (2006, p. 70) “*discursive hegemony*”, is reached when a particular discourse achieves both a high level of structuration and institutionalization. While discourse structuration occurs when one discourse dominates the sense-making process in a given policy domain or social unit, the institutionalization of discourse is reached when it is incorporated into a set of institutional arrangements.

Figure 2: Factors shaping the discursive outcome – in adaptation to Simoens et al. (2022)



### 2.3 Zooming in: Conditions for Discursive Lock-In and Discursive Change

#### 2.3.1 Discursive Lock-In

According to Simoens et al. (2022a, p. 1846) a discourse can be seen as locked-in “*when its dynamics of reproduction become self-reinforcing, shaping a persistent perception of reality. In other words, the institutionalized discourse [...] becomes automatically reproduced*”.

Accordingly, Simoens et al. (2022a, p. 1844) identify three mechanisms with a mutually reinforcing nature, resulting in a situation where all three are typically present in cases of discursive lock-in (cf. Appendix A for visualization).

### Lock-In Type 1: Unchallenged Values and Assumptions of the Meta-discourse

Discourses can be regarded as embedded in so-called meta-discourses. Simoens et al (2022a, p. 1844) propose that “*meta-discourses are strong and fixed abstract ideas that set an even broader context in which the interactive processes between discourses, narratives, and agents takes place*”. This implies that without changes in the ideological context, narratives are less likely to alter a discourse’s trajectory. In the European case, the meta-discourse of “*ecological modernization*” is said to be dominating discursive contestations (Leipold, 2021, p. 1). It is often used synonymously with terms like “*‘green development’ or ‘green growth’*” (Jänicke, 2020, p. 13) and proposes that growth and sustainability go hand in hand, thereby drawing from techno-optimist imaginaries which claim “*that science and technology will be able to solve the major social and environmental problems of our times, without fundamentally rethinking [growth-based] consumption and production patterns*” (Alexander & Rutherford, 2019, p. 1).

### Lock-In Type 2: Incumbents’ strong discursive agency

Simoens et al. (2022a, p. 1846) further argue that, when the actors belonging to the dominant discourse coalition have a relatively stronger discursive agency than their challengers, there is a high probability that their narrative remains dominant, despite the availability of attractive counter-narratives.

### Lock-In Type 3: Narrative co-optation

The third lock-in type is concerned with the issue of narrative co-optation. Counter-narratives can be conceptualized as radical or marginal, depending on how far they diverge from the dominant discourse. The authors propose, in line with Hajer’s (1995, p. 57) notion of a “*discursive dilemma*”, that radical counter-narratives are at risk of “*not being reproduced by any discursive agent*” (Simoens et al., 2022a, p. 1847), while marginally diverging narratives are easily coopted by minor changes in the dominant narrative and consequently rather reproducing than changing it.

#### 2.3.1 Discursive Change

On the other hand, Simoens et al. (2022a) hold, that for a discursive change, factors breaking the automatic reproduction of a dominant discourse are required. Accordingly, they conceptualize one pathway of change as disruptive “*discursive change resulting from exogenous events, such as natural disasters, that alter the values and assumptions of the meta-discourse*” (ibid., p. 1847).

A further field of theory, looking in more detail at the processes by which discursive factors shape institutional outcomes, can be found in the Critical Juncture Theory (CJT) (Rinscheid et al., 2020). Responding to Vivian A. Schmidt's call for "*a parsimonious theory of when and how actors succeed in altering the trajectory of [discursive] development*", scholars from the school of discursive institutionalism have developed a theory on "*conditions for change and the processes through which change is brought about by agents*" (ibid.: 855).

Swinkels and van Esch (2022), who have further developed the initial framework by Rinscheid et al. (2020), argue that for a critical juncture to foster institutional change, there must be a permissive condition first. This condition is provided by the disruptive shock that provides the rationale for change. However, for this condition to be sufficiently met actors need to interpret the landscape shock as a discursive event (Hajer, 1995).

Second, they highlight the importance of "*actors' constellations as well as conflict dynamics that characterize the institutional field prior to the critical juncture*". Accordingly, these so-called critical antecedents describe the factors shaping an institutional field before an external shock (Swinkels & van Esch, 2022, p. 13).

Third, turning to productive conditions, the authors propose to examine whether central actors change their beliefs and expectations in response to the permissive condition. They further claim that "*The more resources key actors have and the more (inter-)connected key actors are, the more likely that they will be able to incite a joint belief shift*" (Swinkels & van Esch, 2022, p. 14).

Finally, they propose the idea of endogenous and exogenous mechanisms, that link the critical antecedents to the productive conditions and thereby explain how a joint belief shift is triggered. Endogenous mechanisms in this context refer to processes in which a policy change is brought about by a change in the "*substance or saliency of a previously held belief*" (ibid. 15) - in other words, through a change of mind. In exogenous mechanisms of change, it is not a belief itself that changes, but the societal power, dominance, or diffusion of a certain idea within a dominant belief system.

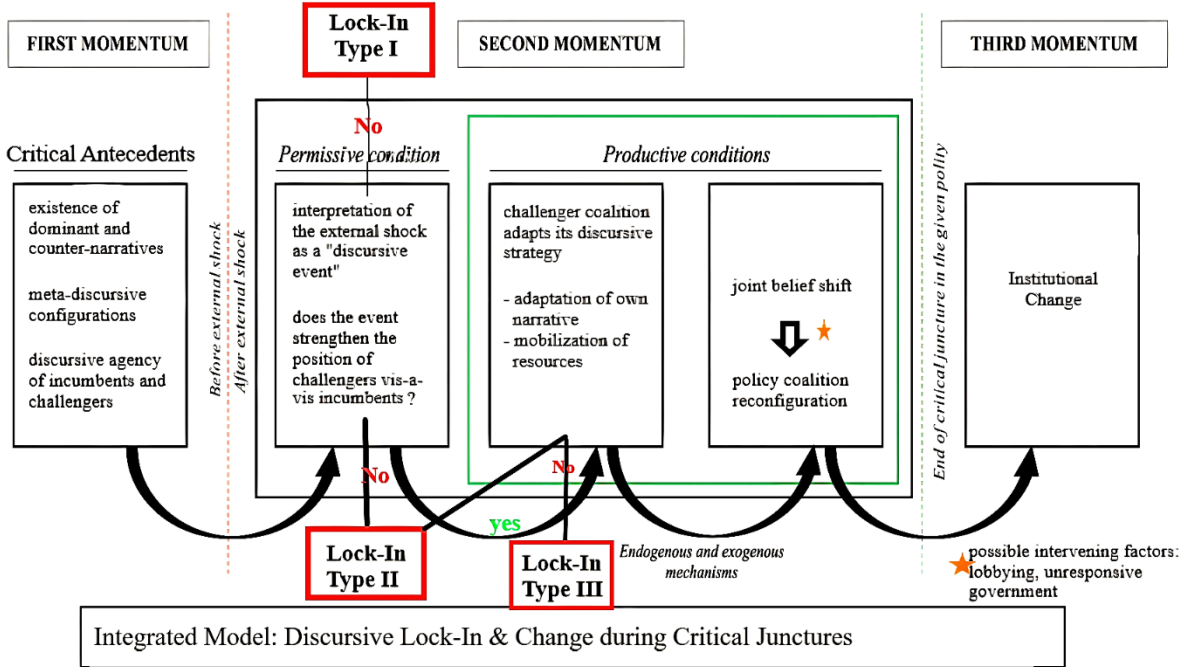
While this theory offers enriching value to the study of discursive change, a key challenge is that "*DI [Discursive Institutionalism] mostly addresses individual agents equipped with the abilities to shape the discourses and institutions around them*" (Leipold & Winkel, 2017, p. 521). Since this thesis focuses on stakeholder coalitions (= collective agents), which in the case of European energy policy hold no direct decision-making power by themselves, but rather aim

to convince individual agents (i.e., policymakers) of their beliefs, the CJT needs to be adapted to fit this thesis’s analysis. Accordingly, this thesis focuses rather on the spaces where narratives originate and on the factors that may shape their adoption by policymakers, and less so on how coalition building within the policy space reconfigures majorities for a certain position (which the CJT typically does). This adaptation will be done by integrating the above-outlined theoretical notions about factors shaping the trajectory of a discursive contestation (discursive agency and narratives) into the phases outlined by the CJT. The following section presents the integrated framework and argues for the adaptations made

### 2.4 Integrated Framework: Discursive Lock In & Change during Critical Junctures

Connecting the different theoretical concepts outlined so far, this thesis proposes an integrated theoretical framework for studying the dynamics of discursive lock-in and change in the context of a disruptive shock. Drawing on the CJT, the analysis is anchored in three different phases: first, the critical antecedents to the shock, second, the critical juncture, during which permissive and productive conditions come to play and third, the institutional outcome of the critical juncture.

Figure 2: Integrated Model



In line with the above-outlined insights on factors shaping a discursive field (Simoens et al., 2022a) the notion of critical antecedents is refined by focusing on the factors shaping a dominant discourse’s structuration (i.e., actors’ discursive agency and the power of their respective narratives). While for the permissive condition, no substantive changes were made,

the productive conditions were adapted. In line with Swinkels and van Esch's (2022) proposition that actors' resources and connectedness are decisive factors in triggering a joint belief shift, the discursive agency approach offers a refined perspective on actors' individual and positional characteristics as factors for their ability to exert discursive power. Consequently, it needs to be assessed if any changes to actors' skills and positionality have been induced by the external shock. Moreover, in addition to actors' skills and positionality, the "strategic practices" they employ in response to the discursive shock are to be considered. Therefore, it is proposed to include a focus on how actors' narratives (content & construction) as well as other practices of political participation or identity construction are adapted in response to the discursive shock. While the process of policy coalition reconfiguration in response to (possibly) changed discursive field is black-boxed in this analysis, the third momentum entails the institutionalized outcome which can, depending on its alignment with either the prior dominant or the challenger narrative, allow conclusions on whether a renewed discursive lock-in or a discursive change has occurred.

Introducing Simoens et al.'s (2022a) discursive heuristic to the study of critical junctures offers significant explanatory value, as it provides further insight into factors explaining the circumstances under which influential discourse coalitions may trigger a joint belief shift of key institutional actors: On one hand, a possible discursive change could be explained by those factors that bring counter-narratives to the fore. For instance, when changes to the discursive field sparked by the disruptive shock favor challengers' discursive agency, and when these changes are furthermore strategically exploited by challengers (e.g., by adapting their narrative to make it more appealing) there is a chance for them to change a discourse's trajectory. On the other hand, the possible persistence of a lock-in despite a disruptive shock can be explained by the three different lock-in mechanisms: unchallenged values of the meta-discourse, incumbent's continued strong discursive agency & their practices of narrative co-optation.

Before this framework is applied to the empirical investigation, the next section will detail the methodology of this research.

## 3. Methodology

### 3.1 Case & Actor Description

As introduced, the case of this analysis is thematically bound by the topic of gas's role in the European Energy Transition and temporally bound by the critical juncture framework's three momentums. The analysis thus comprises three distinct but interrelated periods within a time frame ranging from December 2019 until May 2022:

- The first momentum begins with the EGD (2019) and ends right before the external shock RIOU (February 24<sup>th</sup>, 2022)
- The second momentum describes the period between the RIOU (February 24<sup>th</sup>, 2022) and the publishing of the REPowerEU plan by the European Commission (May 18<sup>th</sup>, 2022)
- The third momentum describes the outcome of the discursive struggle, as fostered in the institutionalized changes visible in REPowerEU plan (May 18<sup>th</sup> 2022)<sup>1</sup>

The "relevant actors" selected for analysis are inspired by a report from the NGO InfluenceMap (2023), which uses a multi-layered methodological approach to track the engagement of lobby actors in policy-making processes. Since the report lists a wide range of actors influencing the REPowerEU plan, its findings were compared with actor statistics from the European Transparency Register (2023) and reports from Corporate Europe Observatory (CEO, 2017; 2021) to identify the most influential collective actors (e.g., past importance in influencing energy policy, lobbying budget, membership). This effort revealed the Climate Action Network (CAN) and Gasnaturally as relevant collective actors suitably representing the two opposing discourse coalitions due to having the largest membership numbers and their overall policy engagement (lobby meetings on the topic, number of publications). It was decided to exclude other industries because even those with a focus on renewables often have a mixed energy portfolio and vary in their degree of transition commitment. Additionally, even the biggest, 100% renewable industry associations such as SolarPowerEurope or WindEurope have been reported subject to board infiltration by fossil actors in the past (CEO 2017, p. 13). Accordingly, an investigation of these actors' positions is of such empirical scope that it can't be covered in this thesis as well.

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<sup>1</sup> not yet including the European Parliaments and Councils position, because the trilogue negotiations that will further shape the final plan are still ongoing at the point of this thesis' data collection & analysis

### 3.2 Research Approach

In line with the discursive lock-in heuristic (Simoens et al., 2022a) and the critical juncture framework (Swinkels & van Esch, 2022), this thesis employs an interpretative, process-tracing oriented case study design that focuses on the discursive forces of stability against the forces of change within the dynamic context of a disruptive event.

For analyzing actors' discursive agency Simoens et al. (2022a) explicitly point towards the Discursive Agency Approach (DAA) (Leipold & Winkel, 2017). Since Simoens et al. (2022a) do not give a specific suggestion for a methodological approach to study narratives, a review of narrative analyses in transition literature was conducted.

Prominent studies utilizing narrative analysis in the context of energy transition research have turned to historian approaches for analyzing the role of narratives in discursive developments (cf. Hermwille, 2016; Roberts, 2017). This approach is however not suitable for this thesis, since the transition from gas to renewable energy is what Hermwille (2016, p. 243) calls a "*transition in the making*". For such cases, Hermwille (2016, p. 246) has called for "*methodologies that are of an explorative nature and that are able to unveil contemporary narratives*". Accordingly, it was decided to draw from Wittmayer et al.'s (2019) Narrative of Change Framework (NOCF) to analyze the narratives' content. For shedding light on the factors making narratives convincing (i.e., their *construction*) it was decided to include a further step aimed at analyzing strategic discursive practices actors employ in their narratives, drawing more heavily from the Discursive Agency Approach (Leipold & Winkel, 2017).

The final approach developed can thus be coined narrative discourse analysis, which is a qualitative-interpretive research methodology in the tradition of the linguistic turn (Riessman, 1993, 2005). Fundamentally building on the works of Michel Foucault it belongs to the poststructuralist paradigm. It builds on the idea that humans think, perceive, imagine, and make moral decisions based on narrative structures and thus builds on the concept of "*homo narrans*" (Wittmayer et al., 2019, p. 3). A narrative can accordingly be analysed as "*the key vehicle by which signification/meaning is transported*" (ibid.: 239). Its application involves an in-depth analysis of textual data through an iterative process, paying close attention to language and the form of storylines embedded in texts. Like the Narrative Analysis, the DAA complementing this research, is an interpretive methodology in poststructuralist grounding, both sharing the methodological limitations outlined below.



### 3.3 Methodological Reflections: Limitations, Generalizability, Subjectivity

As in any interpretative analysis, the researcher's position must be reflected critically. In the theory section, the concept of dialectically constituted agency was introduced, and in accordance with Leipold and Winkel (2017, p. 520), I agree to extend this notion to a concept of "*trialectic concept of agency*". This means acknowledging the double hermeneutic process of discursive research because analysing discourse essentially means interpreting interpretations. Therefore, to mitigate the risk of researcher bias, this paper uses a theory-driven approach to interpretation and, where possible, compares its interpretations to other researchers' findings. Additionally, in line with Mayring's (2010, p. 116) concept of intracoder-reliability the documents were coded two times with the same codes with a months' time in between, and if they diverged, controlled again, so that researcher bias could be mitigated to the best degree possible in the scope of a bachelor thesis. To ensure the traceability and replicability of this research, the following sections further detail the process of data collection and analysis.

Since the case study takes place in the EU – a system sui generis – all findings first and foremost contain relevant insights for the qualitative study of other meaning translation processes within the European governance framework. In agreement with the *analyticist* approach to process tracing proposed by van Meegdenburg (2023) for actor-centered and interpretivist studies, all empirical mechanisms identified are treated as Weberian ideal types. This means "*abstract constructs that are adduced from multiple concrete, contextually embedded, and largely idiosyncratic instantiations*" (van Meegdenburg 2023, p. 1), in order to be used for more general propositions in the field of energy transition studies.

Finally, the methodological approach black-boxes, due to time and resource constraints, how key political coalitions within the European Commission (e.g., different DGs, and their respective officials) have shifted positions in reaction to the shock. This analysis could be done using, for example, the Discourse Network Analysis Approach (DNAA) (Leifeld, 2017), but would require an additional, large dataset of key political actors' statements over time. By looking at the institutionalized outcome of the political struggle, this bachelor thesis can draw conclusions about the power of narratives, but cannot trace their entire adoption process in detail. Moreover, this thesis is limited in its investigation of other influential factors, such as explicit interests of powerful member states, not publicly disclosed lobby meetings, or decision makers personal motivations, which may also have influenced the Commission's motivations in shaping the REPowerEU plan.

### 3.4 Data Collection & Analysis

#### 3.4.1 Discursive Agency Assessment

To analyse actors’ discursive agency the Discursive Agency Approach by Leipold and Winkel (2017) is used as proposed by the authors regarding actors’ individual & positional characteristics as well as the strategic practices they employ. In addition to the primary data collected for narrative analysis, secondary data consulted for this assessment includes scientific publications, NGO reports, and information about the actors provided in the European Transparency Register (2023) as well as meetings between actors and pertinent officials made publicly available under Article 10 TEU.

Actors included for this assessment are limited to Gasnaturally and the Climate Action Network, as well as their respective members. As can be seen in the DAA authors’ own empirical applications of the approach (Leipold, 2021) it is equally valid as sensible to be flexible with the adopted focus depending on the type of actor analysed. Especially when collective actors are analysed, some individual characteristics can be side-lined, while giving priority to the analysis of positional characteristics and strategic practices.

Table 2: Discursive Agency Assessment

Dimensions	Description of aspects considered for analysis
<b>Individual Characteristics</b>	<ul style="list-style-type: none"> <li>• <i>“Knowledge of an issue, commitment”</i> (Leipold &amp; Winkel 2017: 524) (other factors from the original approach sidelined due to non-applicability to collective actors such as NGOs or Industry)</li> </ul>
<b>Positional Characteristics</b>	<ul style="list-style-type: none"> <li>• Core networks/coalitions among involved actors</li> <li>• <i>“Credibility, mandate to act, material resources, ecological/social situation with which actors faced, connection to discursive structures”</i> (ibid. 524)</li> </ul>
<b>Strategic Practices</b>	<ul style="list-style-type: none"> <li>• Practices of political participation</li> <li>• Discursive strategies aimed at identity construction and perception of legitimacy (ibid.)</li> <li>• Governance strategies <i>target ‘a restructuring of the policy making process once it is to the advantage of a specific coalition’</i> (Leipold &amp; Winkel 2013: 13)</li> </ul>

### 3.4.2 Narrative Assessment

To analyse stakeholder narratives over time, documents from both representative actors from before and after the RIOU were collected by screening their websites for publicly available statements concerning the role of gas in European energy policy, as well as Euractiv.de and EUobserver.de for sponsored articles (cf. Appendix B).

For analysis, first, all identified documents were coded deductively with the help of atlas.ti for their “content”, according to Wittmayer et al.’s (2019, p. 2) dimensions of “rationale, actors and plot”, and second, their “construction” with the searchlights outlined in the theory section (Leipold & Winkel, 2017, p. 526; Metze & Dodge, 2016; Wittmayer et al., 2019, p. 3). To finally analyse the alignment of the REPowerEU package with these narratives the Commission’s REPowerEU plan and related communications (i.e., factsheets, online presentation) were collected and coded for narrative alignment (cf. Appendix B).

*Table 3: Narrative Coding (for description of codes cf. p. 5f).*

Type of coding	Category (level 1)	Category (level 2)	Codes used
<b>deductive coding</b>	<b>content</b> (adapted from Wittmayer et al. 2019: 2)	rationale	problem; desired future
		actors	supporting actors; counteracting actors
		plot	activities leading to the desired future: activities counteracting the desired future
	<b>construction</b> (adapted from Wittmayer et al. 2019: 3, Leipold & Winkel 2017: 526; Metze & Dodge 2017)	discursive strategies	relation to meta-discourse, scientification; emotionalization; (de-)legitimation; exclusion, employing normative power; ‘re & deissuing’; active demarcation

## 4. Empirical Section

### 4.1 First Momentum: The Critical Antecedents

According to the theoretical framework, the first momentum describes the critical antecedents prior to the discursive shock, i.e., the discursive field's structuration, shaped by relevant actors' discursive agency as well as their respective narratives.

#### Actors' Discursive Agency

Regarding incumbents' individual & *positional characteristics*, Szabo (2022, p. 1) shows how their material and institutional bases of power, i.e., “*control over resources, infrastructure, and involvement in the policy-making process*”, have provided them with a strong speaker position on the topic of gas in the European Energy Transition. Driven by the meta-discourse of ecological modernization European politics have assigned the gas industry an important role in shaping energy-political developments (ibid.). More specifically Dudău and Simionel (2011) outline how the EU's liberalization of the gas market, through the EU's third energy package, has institutionalized the quasi-governing power of incumbents. Accordingly, the industry is a relevant governance partner included “*in developing market regulations, codes, and guidelines*” (Szabo, 2022, p. 2), an ‘inside position’ best observed in the European Network of Transmission System Operators for Gas (ENTSO-G). This gives its industry members a strong mandate to act, due to its task of creating the Ten-Year Network Development Plan - a power which has been criticized by energy policy experts as “*disproportionately large*” and especially problematic because it “*carries a pro-natural gas bias*” (Szabo, 2022, p. 5; further see ACER, 2019).

In addition to involvement in governance arrangements, scholars point to the economic situation of actors as another factor determining their influence on political developments. This influence is argued to be based on the structural design of the EU's consultation procedures and comitology system, favoring resource-strong actors due to their higher capacity to employ experts and fund research (Kohler-Koch & Finke, 2007). NGOs have pointed out that this imbalance of resources is especially strong in the energy sector (Transparency International EU, 2015, p. 6), showing that the “*gas lobby far out-guns public interest groups in Brussels, spending 30 times as much and with ten times as many lobbyists*” (CEO, 2017, p. 6).

Building on these economic resources, incumbents furthermore invest in building a credible identity, which, according to Fuchs (2007), is a prerequisite to their ability to exert discursive power. Evidence of such practices can be found in their sponsorship of a wide range of

activities, ranging from sporting events to charity projects to party conventions (cf. Deckwirth & Katzemich, 2023, p. 85f). Moreover, the industry is working to present itself as a progressive and dialogue-open partner. Examples of this can be found in the IOGP's (2023) "*Women in Energy*" program or the GIE's (2023) websites engagement section, listing Greenpeace and other NGOs as dialogue partners, concealing the stark opposition these actors actually pose to the industry. All of these activities are aimed at presenting the industry as an important societal player.

Incumbents further use their economic resources to amplify their voices for instance by funding several inside (e.g., ENTSOG) and outside (e.g., Gasnaturally) lobbying associations; employing specialized, well-networked lobby agencies and public relations firms (e.g., Fleischmann Hillard, Weber Shandwick), and finally hosting exclusive events such as the Madrid Forum (CEO, 2017, p. 21f). Moreover, scholars have pointed to the influence of investments into informal lobby networks (cf. Bunea, 2019). The high presence of such networks in the fossil sector and their role in shaping political decisions are increasingly being covered by journalistic reports and political watchdog NGOs (Bingener & Wehner 2023; CEO 2017; CEO et al. 2021, Greens/EFA 2018; Katzemich & Deckwirth, 2023; Stöber, 2023).

NGOs on the other hand are less included in gas-specific governance arrangements and, due to their lesser economic resources, have less capacity to employ experts and maintain networks. In addition, it is much more difficult for NGOs to be perceived as relevant speakers on topics where they are in an outsider position. An example of this is found in the case of research on methane leakage where the industry is in an advantageous position to shape (e.g., by doing desk calculations instead of real-world measurements), disclose, and withhold information due to their control over the infrastructure (EDF, 2020).

While still allocating resources to fund advocacy work, e.g., in the form of providing technical expertise and maintaining wide professional networks (cf. Barnett & Finnemore, 2019), NGOs' discursive agency builds more strongly on their moral legitimacy as representatives of wide parts of civil society and their ability to mobilize their members to exert discursive power (cf. Finnemore & Sikkink, 1998). Through coalition building, public demonstrations, petitions, and coordinated campaigns they aim to amplify their voices (cf. CAN Europe, 2023). This is done to sway public perceptions of a topic (such as the false "*cleanliness of gas*") or more specifically to change policies and governance arrangements, as CAN Europe's (2021, p. 3) call for "*Improving governance by removing institutional power from gas grid operators and increasing transparency*" shows.

NGO's strong focus on discursive strategies to promote a policy change in line with their position, can vice versa contribute to explaining the rationality behind the incumbent's investment-intensive, strategic discursive response aimed at countering challengers' discursive offensive. In sum, incumbents, based on their institutional inclusion and higher economic resources, were shown to have a higher capacity of building discursive agency. However, the success of actors' discursive engagement is theorized to also depend on the content and construction of their promoted narratives, which accordingly will be investigated in the following.

### Initial narrative of incumbents

Regarding its content, incumbents' narrative, prior to the shock, proposes the rationale "*natural gas [is a] fast and cost-efficient solution*" (G1 p. 2) for "*long-term GHG emissions reduction*" (G1, p. 3) in order to achieve a "*low carbon*" (ibid.; G2) future. As terms like "*low carbon*" suggest, their envisioned future is not one without fossil fuels, but one where emissions are either compensated or stored through technologies like blue hydrogen, where gas is transformed into hydrogen and its emissions stored in a process called "*carbon capture storage*" (G1, p.2). Within this low-carbon line of reasoning, gas is key to the task: it is presented as cleaner than oil and coal (G1, p. 2), available in abundance (ibid.), easy to deploy (because infrastructure is already available (G1:3) and any current problems it still has (such as methane leakage) are said to be technologically fixable (G1; G2). Thus, the industry proposes a techno-optimist rationale aimed at widely upholding its current business model based on fossil exploitation.

Offering their "*active [...] support*" (G1: 2) and "*cooperation*" (G2, p. 3) in "*leading*" (G2, p. 2) the transition, the industry frames itself as the actor leading to the desired future. While not explicitly mentioning actors or activities hindering the desired future, the narrative proposes that gas "*serves as essential backup for variable renewable electricity*" (G1, p. 5). This insinuates that renewables cannot provide supply security on their own, opening the way for the frame of gas as a "*strategic*" (G1: 2) and "*key*" (G1, p. 3) partner to renewables. While the gas industry provides the solutions, the EU as a cooperation partner shall provide the funding and regulatory framework for the industry's actions (cf. G1: 7). In terms of the plot, finally, the activities that lead to the desired future accordingly consist in "*industrial innovation*" (G2: p. 1), directing regulation and funding to scale up "*gaseous solutions*" (ibid.) for long-term use, while a failure to do so would threaten energy affordability and thus citizens "*support*" (G1, p. 3) for the transition.

In terms of the constructive elements, several discursive strategies in the narrative content can be discerned. By its framing as a committed and cooperative partner, by listing projects in which the industry is already well underway, and finally by repeatedly speaking of meeting citizens' needs, the construction of the narrative is aimed at legitimizing the industry and its product. Creating a scenario where the energy supply is threatened without gas, the industry has emotionalized the debate. On the other hand, the analysis shows several references to self-sponsored studies (G1; G2) and so-called lighthouse projects (G1), rationalizing the feasibility of the pathway laid out by the industry, so that this threat would not become real. This strategic rationalization is flanked by using normative power: not only does the industry propose gas as a prerequisite to economic stability and prosperity, because of the jobs the industry offers (G2, p. 1), but it also links it to moral questions, such as citizens access to heating (cf. G1, p. 3) and thus their well-being.

Drawing from these observations, it becomes evident that the industry used a variety of discursive strategies in the past to construct their narrative in a way that makes it appear feasible, rational as well as environmentally and socially compatible. This narrative, aligning closely with the ecological modernization paradigm, can best be observed in the industry's final appeal stating: "*Let's work together to develop tomorrow's solutions and make Europe a global climate leader that leaves no one behind on the journey*" (G2, p. 3). This construction finally allowed the industry to transcend its narrative of gas as a *bridge* to gas as an *end fuel* (e.g., *hydrogen blending*), thereby giving gas a place in the energy system, even after 2050.

#### Initial narrative of challengers

In terms of narrative content, the challengers provided a very different rationale: Instead of framing gas as an *end-fuel*, they called on the EU to "*deliver a fossil gas phase out [...] by 2035*" (C3: 1). Coherently, the continued use of fossil gas was framed as a problem, because of methane leakage and the risk of technologies like CCS (cf. C2, C3, C5, C6). The desired future was thus envisioned as fossil-free, not having overstepped the "*1,5 Degree*" threshold (cf. C1-5; C7-9).

The challengers' narrative at the time clearly stated that the actors leading to the future are "*scientists*" and "*citizens*" (C1-3; C7), while the gas industry is the one counteracting it (cf. C2-3; C 5-7). This entails plot-wise, that activities leading to the future, are increased "*citizen participation*" (C3), "*science-based decision making*" (C3; C6) and scaling up "*clean*" (C2: p. 1), "*distributed*" (C3: 3) "*renewable*" (C2, C3, C5, C7,) solutions. On the other hand,

continued inclusion of the gas industry in governance arrangements as well as continued funding of gas projects by the EU are activities counteracting it (C1, C2, C3, C5, C7).

Regarding constructive elements, the challenger's narrative in many ways delegitimizes incumbents' arguments. In a section titled "*prevent the fossil gas industry's continuation through hydrogen and blending*" (C3, p. 2) the challengers did not only frame the industry as an opposing actor but aimed to unmask the blue hydrogen's cleanliness myth (cf. also C2, C7). Such statements are - in all coded "delegitimation" segments - continuously rationalized by quoting a variety of scientific studies and direct normative appeals to the European Commitment to evidence-based decision-making. In a publication targeting the Green Taxonomy the challengers went as far as stating that it "*openly threatens the credibility of both the EU Green Deal and the global leadership of the EU in climate finance*" (C7, p. 2) thus not only questioning the legitimacy of the industry but also the EUs for collaboration. Another relevant demarcation to incumbents happened on the boundary object of citizens – while agreeing that the transition should be about citizens, they proposed completely diametrical ideas of what this notion entails. For instance, they claimed that a real choice of citizens for an energy source was given only when gas "*subsidies are stopped immediately*" (C2, p. 3). Moreover, they framed gas as a threat to people's health and rights (e.g., indigenous groups), building on the normative power of the global energy justice concept (C2, C3). These demarcations and thereby intended de-legitimizations of the gas industry's narrative went on, countering a variety of the above-outlined gas industry's arguments, arguing in reference to scientific studies that renewables alone able to provide grid-reliability and supply security and could thus be considered superior to the high-risk technologies promoted by the industry (C2-3; C6).

In short, the challenger narrative proposed a fossil-free story for achieving the energy transition, actively constructing its narrative in a way that aimed to delegitimize the industry and debunk its arguments, while making scientific claims for the feasibility of renewables. Nonetheless, the narrative was still told within the meta-discursive boundaries of the ecological modernization paradigm, leaving its fundamental assumptions (business as actors leading to the future; techno-optimism) unquestioned, because although these notions were rejected in relation to gas, they were not explicitly rejected in relation to renewable industries and technologies.

### Interim Summary

In conclusion, the field prior to the shock can be characterized by two opposing actor coalitions, speaking from asymmetric positions of power, who promoted very contrasting narratives about gas' role in the energy transition but aligned in their fundamentally techno-optimist orientation.



Considering the European Parliament's concession to the Commission's plan to label gas as "green" in the EU taxonomy (LEX 2020/852) in February 2022, the institutionalized discourse before the shock can be seen as closely aligned with the incumbents' techno-optimistic narrative proposing the compatibility of further gas exploitation with fulfilling environmental objectives.

## 4.2 Second Momentum: Permissive & Productive Conditions

On February 24<sup>th</sup>, the RIOU shook the global energy system with special regard to the availability of fossil gas (cf. Gaffen, 2022), providing the permissive condition for a critical juncture to unfold.

### *Discursive agency after the shock*

While the war had a significant impact on the energy system, it did not bring about immediate changes in actors' individual or positional characteristics<sup>2</sup>. When it comes to the resources allocated to lobbying, the data indicates that industries' spending remained the same or slightly increased in 2022 (controlled for Gasnaturally's members with data from the European Transparency Register, 2023). This trend was also observed at COP27, where the number of gas lobbyists increased by more than 25% compared to the previous year (Michaelson, 2022). While challengers' lobby spending remained the same, they increased their publication output in response to the war and invested heavily in mobilization of the public by calling for demonstrations, and performing media-effective stunts such as dropping banners on the European Council and painting industry ships carrying fossil fuels guiltning them with slogans such as "*stop fueling the war*" (Greenpeace EU Unit, 2023).

Due to the urgency for a quick response, the European Commission initiated no public consultation, restricting stakeholders from submitting official contributions to the debate (European Commission, 2022, p. 5). However, the EU Commissions Executive Vice-President Valdis Dombrovskis, assigned with overseeing the Commission REPowerEU plan (cf. European Commission, 2023a) had three official meetings on the topic of REPowerEU with representatives from the industry, including the European Round Table for Industry (ERT), Equinor and BusinessEurope (cf. European Commission, 2023b) who, according to InfluenceMap (2023), all took a stance for further gas exploitation. At the same time, neither Dombrovskis nor his Cabinet members had meetings with representatives from civil society. This stronger inclusion of incumbents in reaction to the shock also shows in a comparative

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<sup>2</sup> Regarding the European Gas Industries position in European governance arrangements generally. Russian companies, i.e., Gazprom, which were former members of respective European Associations were sanctioned by European Institutions and accordingly lost access to European consultations.

report from Germany, in which Deckwirth and Katzemich (2023, p. 85) reveal a significant increase in lobby meetings between the gas industry and the German Ministry of Economic Affairs and Climate Action for the months following the invasion. This development is relevant at European level for two reasons: first because the Commission, although not holding a public consultation, discussed opinions with national member states (European Commission, 2022, p. 5), and second because of the German government's strong position in embracing the green label for gas in the Taxonomy at the time (cf. Kurmeyer, 2022).

Accordingly, while the war provided an opportunity for challengers to raise public awareness of incumbent's contribution to the energy crisis, it also demonstrates how material and institutional path dependencies have made it necessary to collaborate with the industry during times of crisis, thereby upholding their 'inside position'. Although it is logical that a governance system built on the close inclusion of these actors would struggle to manage a system shock without their close involvement, it is revealing that in a case of crisis, where public consultations are set aside, incumbents' role is actually strengthened in relation to challengers, because they remain in a position to speak their opinions directly to pertinent officials when challengers were not. How incumbents and challengers have furthermore adapted their narratives in response to the RIOU will be shown in the following.

#### Adaptations to the challenger narrative

On the day of the invasion, the challenger coalition published the manifesto "*Renewable Heat for All*" (C8). Beginning with this manifesto a notable shift in their narrative's rationale can be observed: While before the Invasion the problematic characteristics of gas were primarily constructed around its environmental implications and therefore its harm to future generations and people in the Global South, the problem description after the RIOU shifted to Europeans as increasingly vulnerable subjects, in terms of their "*health [due to] air pollution*" from gas heaters and their economic situation due to "*soaring gas prices*" (C8, p. 1). This trend was continued by a de-issuing of the global perspective and a reissuing of the European perspective across publications in the following months (C9; C12; C13; C15; C18, C19).

Contrasting this rationale shift from 'global to local' in the case of citizens' vulnerability, the challengers' narrative, a few weeks later begins to incorporate a geopolitical human security perspective (C10; C11; C12; C13; C18; C19). First introduced in a section titled "*More than ever before, Europe's energy transition is now a peace project*" (C12, p. 1), the challengers use the symbol of a "*crossroads*" (ibid), which constructs an emotional dichotomy between a plot that leads to "*chaos*", "*health crisis*", and "*climate crisis*" (ibid.) and one that leads to the desired

future of "peace", "freedom", and "prosperity" (ibid., p. 2). The second path is said to be achievable only by an earlier phase-out of fossil gas: Russian imports by 2025, all others by 2035 (C10, C14, C15). Coherently, the EU is stressed across publications to end fossil subsidies and establish a regulatory framework that prohibits new gas exploitation but promotes "energy efficiency" and "expanding renewable energies" (cf. C13, C14, C16). This close inclusion of the geopolitical dimension into the narrative has several additional implications for the narrative's rationale: an increase in the urgency of the transition for human security reasons (C10; C11; C12; C13; C18, C19), a moral demand for the gas phase-out in solidarity with Ukraine (C12), and a further debunking of the myth that gas is a reliable and affordable (and therefore citizen friendly) energy source (especially C16, p. 7f).

By emphasizing that Europe's initial difficulties in reducing Russian gas imports were a direct result of the gas industry's lobbying against energy conservation and renewables in recent years, the challengers target the industry's legitimacy by blaming it for the energy crisis (C12, p. 1). In this context, the challengers stress that the normative framework of the EGD "is the solution to the current crisis and false arguments fed by [...] vested interests should be rejected [...] [so that the REPowerEU does not become] an instrument that accidentally undermines the objectives it actually set out to advance" (C20, p. 1f) thus rejecting and delegitimizing gas-positive rationalities. To rationalize the argument that incumbents provide "false solutions" (cf. C8, C10, C13, C15, C18-20) in a convincing manner, the challengers throughout publications reference studies highlighting the vulnerability of Europeans to the crisis (C10, C13, C19) and draw from the IPCC's renewed urgency statement (C10, C11, C13, C19). They also make legal reference to the "no significant harm" (C14, 21) principle and finally present a self-authored scenario study evidencing the feasibility of a quick Russian gas phase-out (first introduced in C13, further mentioned in C14, C18, C19, C21) consequently pointing to the nonsensicality of new supply contracts. In sum, challengers exploited RIOU to further delegitimize incumbents and call for a more urgent transition to renewables for reasons of moral solidarity and supply security.

#### Adaptations to the incumbents' narrative

Meanwhile, incumbents remained noticeably silent on the issue of the RIOU. Publishing only a factsheet on "Gaseous solutions for residential heating" (G3) giving a matter-of-factly appearance, they actively demarcate a claim made in the above-mentioned challenger heat manifesto, that "over 90%" (C8, p. 1) of Europe's gas supply is imported and therefore vulnerable to geopolitical developments. For this purpose, the industry presents an overview of

numbers rationalizing the importance of the gas-fueled heating sector for the European economy in which they include the highly contrary notion *that “Imports from non-EU countries are less than 10%”* (G3, p. 1). Only upon researching the source (EHI, 2020, p. 7), it becomes evident that the number describes the origin of heating systems, not the fuel put in it. This strategy goes on with another position paper on alternative fuel infrastructure, where the industry calls for *“a strong policy framework for the further deployment of alternative fuels infrastructure to achieve the Green Deal objectives”* (G4, p. 1) and argues with the low carbon characteristic of *“gaseous fuels”* (G4, p. 2) that they have a key role in transport sector decarbonization and that moreover scaling up gas is still an activity leading to the desired future. Right after, the industry published an invitation for European policymakers to discuss the role of LNG in the energy transition in the *“exclusive”* (G5, p. 1) format of a Virtual Roundtable, signaling their problem-solving ability as still the actor leading to the desired future.

By silencing the RIOU and re-issuing attention to gas’ problem-solving ability in the transport and heating sector, as well as shifting the focus from pipeline gas (mostly from Russia) to LNG gas (possibly to come from other places than Russia) the industry strategically employs an exclusion strategy to divert attention away from the challenger’s critique and towards an image of the industry as still a committed and legitimate actor in the European energy transition.

The first time the industry publicly positioned itself to the war, was on March 28th, as a *“reaction to the European Council of 24-25 March 2022”* (G6, p. 1) where sanctions against Russia, including gas import restrictions, were discussed. In a public statement, incumbents promulgate their support for *“reducing the EU’s energy dependencies through the ramping up of production in the EU and its neighbourhood”* (ibid.). Accordingly, the plot is reconstructed around the benefits of a slower, gas-based transition (shifting supply safely from pipeline gas to LNG to hydrogen) in opposition to hectic action, harming the economy and citizens. This narrative is continuously argued for in the released statements up until May 23’: In arguing that a planned regulation on methane emission reduction *“should be less prescriptive [...] [and] avoid excessive requirements with disproportionate efforts to industry and consumers but with no or very limited environmental benefit”* (G8, p. 1) they delegitimize the challengers’ claim about gas’s climate harm, again rationalizing the debate to claim gas as an attractive future option. In their final publication before the Commission’s plan, they make a last normative reference to the EU-Taxonomy, which is said to have highlighted gas’ transitional role until *“lower gaseous fuel options”* (G7, p. 2) (e.g., blue hydrogen as an end fuel) would become available. In sum, incumbents’ post-RIOU narrative depicts a clear continuation of their pre-

RIOU narrative, keeping with the rationale that gas is the safest and socially coherent option, strategically diverting attention from the problems exposed by the RIOU.

### 4.3 Third Momentum: Institutionalized Discursive Outcome

#### 4.3.1 REPowerEU Alignment with Stakeholder Narratives

On May 18th the Commission published their REPowerEU plan, building on the three pillars of saving energy, producing clean energy, and diversifying energy supplies. This thesis shares Vezzoni's (2023, p. 1) assertion, that the plan primarily *“aims to boost green growth, defend liberal democracy, and increase Europe's energy sovereignty”*. Therefore, it is a legal framework, driven not only by energy-political but also by economic and geopolitical interests.

Considering the first two momentums' findings, the REPowerEU's continuation of the meta-discursive assumption of ecological modernization (as visible in the green growth orientation) is not surprising, as it was promoted by both stakeholder coalitions' narratives. However, their narratives differed in the question regarding which industries are the actors leading to the desired future and accordingly, whether this future entails fossil fuels or not. In this regard, the REPowerEU plan shows a closer alignment with the incumbent narrative, stating that future gas demand projections and related investments schemes for member states shall be based on *“the assessment conducted and agreed by [...] ENTSOG”* (EU2, p. 10), keeping the industry closely engaged, despite the challengers' investment in claims to change their governance engagement. While increasingly mentioning the need to *“decrease fossil fuel imports from Russia”* (EU1, p. 1), the REPowerEU plan does not go as far as proposing an earlier phase-out of gas in general. This restraint in questioning gas' role as a transition fuel becomes most evident in the elaborations on the third pillar *“diversifying energy supplies”* (EU2, p. 2f), showing that the overall *“objective”* (EU2: 3; EU3) of the REPowerEU plan is to meet *“immediate security of supply needs for oil and gas”* (EU2, p. 16). This entails that immediate consumer needs are put first, and that the goal of replacing fossil fuels with renewables remains a secondary motivation. Moreover, although the plan claims to opt for a *“just, inclusive transition”* (EU3, p. 1), it doesn't propose changes to price-building mechanisms, the liberal market design in general, or stakeholder participation. These findings align with critiques by Labor Unions and energy scientists stating that the REPowerEU plan provides a foundation for ensuring European energy availability, but fails to meet other criteria, especially procedural elements, of energy justice (EPSU, 2022; Lonergan et al., 2022). Additionally, contracts with new gas suppliers can be exempted from the principle of 'do no significant harm' (EU4, p. 7), thus subordinating global energy justice issues to European supply security objectives.

Regarding its rationale as well as the actors and activities that are said to lead to the desired future, the plan aligns more strongly with the incumbents', than the challengers' narrative.

Yet, Giuli and Oberthür (2023, p. 404) find that *“the diversification component of the response to the 2022 crisis was overall more coherent with climate objectives than in past crises [...] although still not fully in line with CPI [climate policy integration]”*. Additionally, the REPowerEU plan's first pillar “saving energy” (EU2, p. 9) shows a strengthening of the energy efficiency first principle which is a prerequisite for decreasing the demand of fossil fuels and sufficing with *“clean energy”* (EU1, p. 15). Von Malmborg (2023, p.11) argues that this strengthening in the REPowerEU plan occurred because next to climate protection, *“security of supply and alleviating energy poverty”* objectives were strengthened in response to the energy crisis. Additionally, the REPowerEU plan shows a stronger commitment to *“renewable or fossil-free hydrogen and increasing the share of renewable energy”* (EU1, p. 15). This much stronger commitment to renewables in the long term is also evidenced by the revisions proposed under the REPowerEU plan to the Renewable Energy Directive which foresee a tightened schedule for making hydrogen used in the future to come from renewable sources more strictly (cf. C21). The first pillar, thus aligns more strongly with the challengers' narrative, who posited a strengthened commitment to energy efficiency as a prerequisite for renewables to suffice and objected to carbon-based hydrogen solutions as an end fuel.

In sum, the REPowerEU plan shows a continuance of the discursive lock-in on gas as a “bridge fuel”, giving no clear phase-out date and keeping fossil industries closely engaged. On the other hand, it proposes to scale up renewables and shows increasing signs to challenge the long-term use of fossil gas as an end fuel.

#### 4.3.2 Discussion of Findings with Recourse to the Theoretical Framework

With recourse to the theoretical framework, the outcome of the critical juncture was expected to be determined by the critical antecedents, the productive conditions, and the mechanisms linking the critical antecedents to the productive conditions. Accordingly, this section will first outline the mechanisms that contributed to the renewed lock-in and second, those that could explain the strengthened role of renewables. While one theorized lock-in mechanism related to actors' discursive agency, the other two related more strongly to their narratives.

The lock-in mechanisms linked to the narratives content and construction were theorized to occur when meta-discursive assumptions were left unchallenged by a challenger-narrative (Lock-In Type I) and second, through incumbents' 'narrative co-optation' (Lock-In Type III).

In the first momentum, the institutionalized field was structured by the European Green Deal (EGD). The EGD is regarded as a framework essentially built upon the meta-discursive assumptions of ‘ecological modernization’ (Schunz, 2022) and as shown by Stegemann and Ossewaarde (2018, p. 27), the post-truth tendencies embedded in this paradigm “*secure the continuation of the use of fossil fuels and the nihilist championing of giant energy corporations like BP and Shell*”. The narrative analysis has shown that challengers, although defying fossil gas and its industry, have constructed their narrative in close alignment to the ecological modernization paradigm and with direct reference to the EGD. Accordingly, it has left its underlying assumptions of technological innovation, and market-based solutionism unchallenged. At the same time, incumbents constructed their narrative in a way aimed at their own legitimation and rationalizing the compatibility of gas with environmental goals. By sharing the rationale that renewables are the future, however, only in a situation where gas remains their necessary partner, they strategically co-opted the environmental goals outlined in the EGD. The EU’s decision to label gas as "green" in the EU taxonomy (LEX 2020/852) clearly shows the success of incumbents’ strategy, before the shock.

While during the second momentum, challengers were able to exploit the RIOU to further delegitimize incumbents, they again did not challenge the meta-discursive assumptions of ecological modernization. Incumbents, by diverting attention away from their role in the energy crisis and by proposing not only the benefits of gas for the environment and economy but also by proposing the feasibility of simply diversifying gas supply, were able to co-opt the increasingly popular objectives of ensuring supply security, alleviating energy poverty, and assuring Europe’s Energy sovereignty, all while continuing to boost green growth.

A further reason why incumbents may have been more successful with their narrative was - before the shock, as after - identified in their stronger discursive agency (Lock-In Type II) vis-à-vis challengers. The critical antecedents showed their much stronger speaker position to be grounded in their strategic investments in constructing an identity of credibility, as well as their individual and positional characteristics. Due to their advantaged position in shaping evidence on methane emissions, their greater economic resources to fund inside and outside lobbying as well as their advantaged institutional position, they were in a better position to influence dominant policy discourses than challengers. The second momentum showed that during times of crisis, this advantaged position was even strengthened. While the suspension of public consultations weakened challengers’ discursive position, the necessity to collaborate with incumbents during times of crisis remained, as was seen in their continued access to pertinent

officials. Accordingly, while the RIOU provided challengers an opportunity to strengthen their narrative's appeal, they had less opportunity to present it to pertinent officials than incumbents. Hence, this disadvantage was set on top of their already weaker discursive agency.

Nevertheless, the REPowerEU plan has further been shown to argue for a much stronger focus on renewable energy. This finding is consistent with Swinkels's and van Esch's (2022) contention that the prominence of a particular idea can increase without meta-discursive configurations changing (i.e., an exogenous mechanism of change). Subsequently, it suggests itself that the challengers' strategy of delegitimizing gas as a high-carbon fuel in combination with their rationalized claims about the ability of renewables to replace gas, may have merited positive long-term results in terms of ending the incumbents' end-fuel narrative. However, in the absence of a clear commitment to an earlier phase-out date, the EU's call for explicitly fossil-free hydrogen expansion (EU2, p. 15), while very directly challenging carbon-based hydrogen (cf. C21), is only a minor change to the institutionalized discourse (Lock-In Type III).

## 5. Conclusion

This thesis set out to argue that the discursive perspectives can enhance the study of the carbon lock-in phenomena. By exploring the discursive contestations over the REPowerEU plan, it showed how discursive lock-in mechanisms have prohibited fundamental discursive change, in a context that could have otherwise allowed for a critical juncture to unfold.

Regarding the first sub-question “*How was the discursive field structured before the RIOU?*”, this thesis, identified a stronger discursive agency for incumbents than challengers. By further exploring how meta-discursive assumptions left unchallenged by challengers have allowed for the strategic co-optation of the “sustainable transition” by incumbents’ techno-optimist narrative, this thesis could identify three lock-in mechanisms structuring the discursive lock-in prior to the RIOU.

Regarding the second sub-question “*How has the RIOU affected the discursive field (i.e., actors’ narratives and their discursive agency)?*” the analysis has shown that the RIOU has indeed affected actors’ discursive agency and narratives. While it offered challengers a chance to strengthen their narratives appeal through further delegitimation of the industry, it however didn’t lead them to change their position on the meta-discursive assumptions of ecological modernization. In combination with a crisis situation that has led to more top-down governance, and thus a strengthened discursive agency of incumbents, this missed opportunity has likely allowed for the continued success of incumbents’ techno-optimist narrative co-optation.



Regarding the third sub-question: “*How did (possible) effects to actors’ narratives and their discursive agency in response to the RIOU contribute to either reinforcing a discursive lock-in on gas or challenging it?*” this thesis has shown, that in accordance with the theoretical expectations, the lock-in mechanisms outlined under the first two sub-questions have constituted a renewed discursive lock-in into gas, aligning closely with the incumbents “bridge fuel” narrative. Yet, in parallel, it was also apparent that renewables are becoming increasingly locked-in as well. Furthermore, the analysis has shown tentative signs that the “end-fuel” version of the incumbents’ narrative is increasingly being called into question.

Nonetheless, the answer to the main research question is that (RIOU) has not acted as a disruptive shock to the discursive contestation over the role of fossil gas in the European energy transition discourse. Although it acted as a discursive event, affecting actors’ narrative construction, it didn’t change their asymmetric positions of discursive power. In consequence, incumbents were able to gain sovereignty over interpretation, subsequently prohibiting a fundamental disruption of the institutionalized discourse.

By identifying the mechanisms, that have constituted this renewed lock-in, this thesis has not only generated new knowledge on the case at hand but has further contributed to corroborating the theoretical assumptions proposed by Simoens et al. (2022). In addition to Buschmann’s & Oel’s (2019) similar findings on coal in the German *Energiewende* and Brauers’s (2022) findings on the case of the German gas lock-in, these findings can be regarded as “*largely idiosyncratic instantiations*” (van Meegdenburg, 2023) speaking to the power of the theoretical model. By integrating the discursive lock-in heuristic into the critical juncture theory, this thesis further advanced the scientific field in the sense, that it provided a (more) holistic, yet comprehensive approach to studying the mechanisms by which narratives become popular or fail to do so within the context of a disruptive shock. Thus, it offered a new perspective to the CJT for why a permissive condition may not translate into a critical juncture.

Nonetheless, there are limitations to this research that must be acknowledged. First, the dissemination of narratives within policy coalitions had to be black-boxed, as well as narratives promoted by other actors, thus taking some explanatory power of the model. Moreover, this thesis provided only a simplified overview of discourse coalitions in the European energy transition, ignoring actors expressing interests outside institutional boundaries (e.g., radical social movements) and other factors that may have played a role in shaping the motivations of relevant officials. Subsequently, expert interviews to gain more insights into discursive agents’ strategic decisions to shape their narratives a certain way, as well as with pertinent officials

about their motivations to decide a certain way, could have further exhilarated the explanatory power of this research. Additionally, there is a variety of further angles from which the topic could have been approached, ranging from a stronger focus on interdiscursive communication (e.g., effects of costs discourses after the pandemic) towards including new materialist perspectives (e.g., exploring the discursive agency of infrastructure), just to name a few.

Yet, regarding more practical implications, this thesis provides activists, scientists, and policymakers with new insights into the mechanisms that need to be overcome to accelerate the energy transition toward a fossil-free future. First, an intuitive assumption is that the challengers' reluctance to question meta-discursive assumptions might stem from the "discursive dilemma". Related to this is the fear that a narrative will not be reproduced by any discursive agent if it deviates too radically from the meta-discourse. However, this concern may be unfounded in view of current developments. For instance, Wiertz et al. (2023) have found an increasing contestation over the ecological modernization paradigm since the RIOU in German public discourse. In addition, the European Parliament (2023) has recently embarked on a debate about the possibilities of going "*beyond growth*" - so it may be time for the challengers to change their strategy accordingly. Secondly, in order to break incumbents' strong discursive agency structural changes in the governance architecture of the EU are needed. Participatory methods to better incorporate unheard narratives into dominant discourse are available and should be implemented as a matter of course by an institution committed to democratic responsiveness (cf. Marquardt & Nasiritousi, p. 638). As Albert Einstein once famously remarked, we cannot solve our problems with the same level of thinking that created them (New York Times, 1946).

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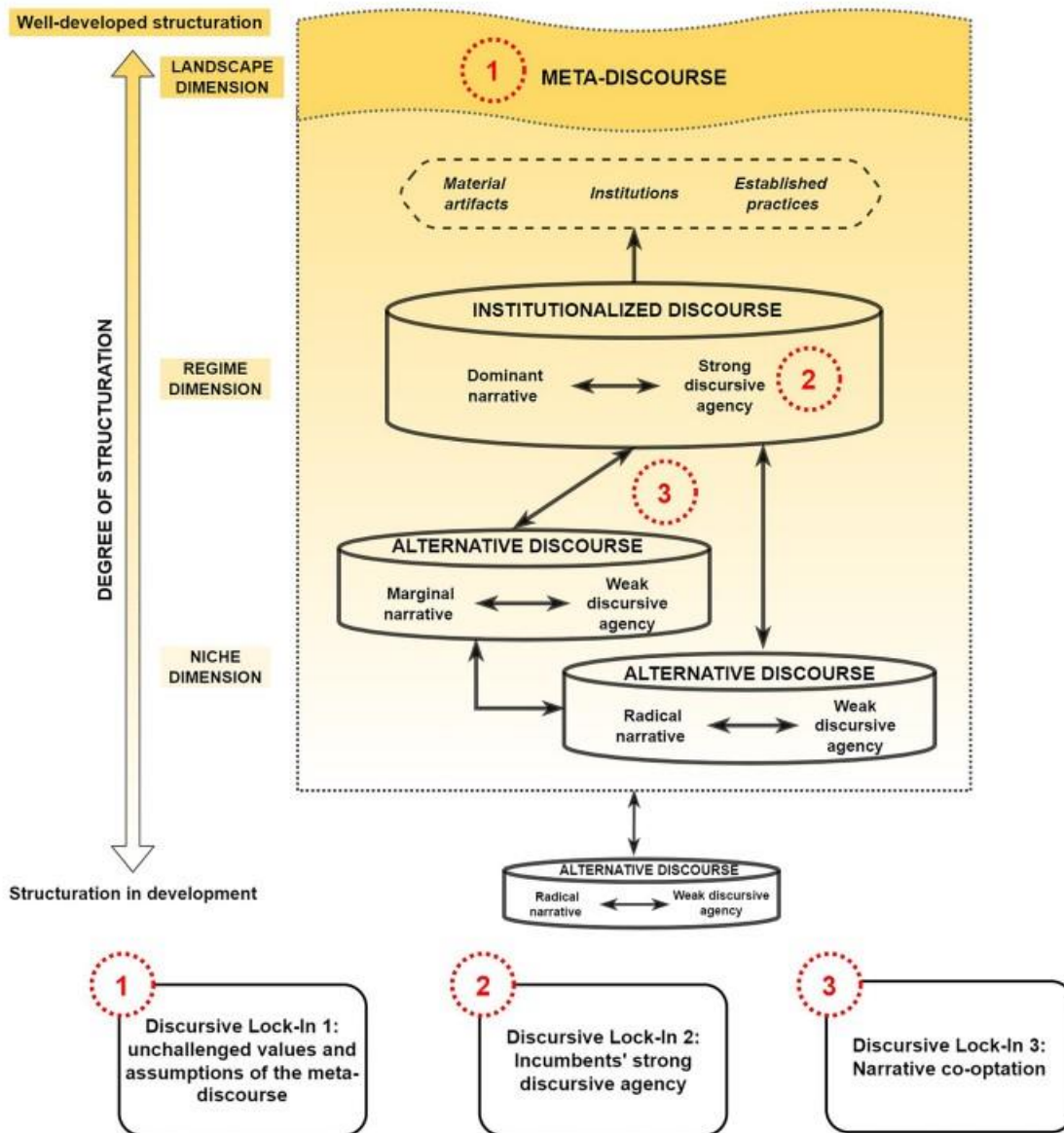
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# Appendix

## Appendix A: Discursive Lock-In Visualization (Simoens et al., 2022a)



## Appendix B: List of Coded Documents

Actor	Before Shock	After Shock
<b>Gasnaturally</b> (n = 9)	<p>2019<sup>3</sup> Manifesto of the European Gas Industry (G1)</p> <p>25.03.2020 A competitive European industry: the contribution of gas technologies (euractiv.de)<sup>4</sup> (G2)</p>	<p>28.02.2023 GasNaturally Factsheet on Gaseous Solutions for Residential Heating <sup>5</sup> (G3)</p> <p>16.03.2022 GasNaturally Position Paper on the Deployment of Alternative Fuels Infrastructure (AFIR)<sup>6</sup>(G4)</p> <p>18.03.2022 Check out: Liquid Gas Europe Virtual Roundtable – Towards 100% renewable gaseous solutions in off-grid areas<sup>7</sup>(G5)</p> <p>28.03.2022 GasNaturally Reaction to the European Council of 24-25 March 2022<sup>8</sup>(G6)</p> <p>11.05.2022 GasNaturally Policy Statement on Taxonomy<sup>9</sup>(G7)</p> <p>11. 05.2022 GasNaturally Policy Statement on Methane Emissions Reduction in the Energy Sector <sup>10</sup> (G8)</p> <p>18.05.2022 GasNaturally Press Release on the REPowerEU Plan <sup>11</sup> (G9)</p>
<b>Climate Action Network</b> (n= 21)	<p>03/2022 Candidate projects for the 5th PCI list: a final push for fossil gas? (C1)<sup>12</sup></p>	<p>24.02.2022 Renewable Heat For All – Manifesto<sup>19</sup> (C8)</p> <p>24.02.2022 After fossil gas companies’ record 2021</p>

<sup>3</sup> <https://www.gasnaturally.eu/wp-content/uploads/2018/11/gas-naturally-manifesto.pdf>

<sup>4</sup> <https://www.euractiv.com/section/energy-environment/opinion/a-competitive-european-industry-the-contribution-of-gas-technologies/>

<sup>5</sup> <https://gasnaturally.eu/publication/gasnaturally-factsheet-on-gaseous-solutions-for-residential-heatin/>

<sup>6</sup> <https://gasnaturally.eu/publication/gasnaturally-position-paper-on-a-regulation-on-the-deployment-of-alternative-fuels-infrastructure-afir/>

<sup>7</sup> <https://gasnaturally.eu/publication/check-out-liquid-gas-europe-virtual-roundtable-towards-100-renewable-gaseous-solutions-in-off-grid-areas/>

<sup>8</sup> <https://gasnaturally.eu/publication/gasnaturally-reaction-to-the-european-council-of-24-25-march-2022/>

<sup>9</sup> <https://gasnaturally.eu/publication/gasnaturally-policy-statement-on-taxonomy/>

<sup>10</sup> <https://gasnaturally.eu/publication/gasnaturally-policy-statement-on-methane-emissions-reduction-in-the-energy-sector/>

<sup>11</sup> <https://gasnaturally.eu/publication/gasnaturally-press-release-on-the-repowereu-plan/>

<sup>12</sup> [https://caneurope.org/content/uploads/2021/03/Briefing\\_5th-gas-PCI-list-FV-5.pdf](https://caneurope.org/content/uploads/2021/03/Briefing_5th-gas-PCI-list-FV-5.pdf)

<sup>19</sup> <https://caneurope.org/renewable-heat-for-all-manifesto/>

05/2021 CAN International Position: Fossil Gas <sup>13</sup> (C2)	profits, civil society calls on the EU to provide affordable, renewable heating for all <sup>20</sup> (C9)
17.06.2021 European Civil Society Gas Manifesto <sup>14</sup> (C3)	04.03.2022 CAN EUROPE'S STATEMENT ON THE WAR IN UKRAINE AND THE FOSSIL FUEL ENERGY CRISIS <sup>21</sup> (C10)
15.11.2021 Take action to prevent nuclear energy and fossil gas from being labelled as green <sup>15</sup> (C4)	08.03.2022 The European Commission fails to put a quick end to fossil fuels and to frontline precious funds for the urgently needed energy transition <sup>22</sup> (C11)
07.12.2021 NGO input on the upcoming gas package <sup>16</sup> (C5)	10.03.2022 Open Letter – Europe Off Gas for Peace and Prosperity <sup>23</sup> (C12)
07.12.2021 The hydrogen and gas decarbonisation package under publication needs to improve <sup>17</sup> (C6)	03.08.2022 8 RECOMMENDATIONS FOR AN ACCELERATED, SECURE AND PARIS COMPATIBLE ENERGY TRANSITION IN THE EU IN THE CONTEXT OF THE INVASION OF UKRAINE <sup>24</sup> (C13)
01.03.2022 The EU can't afford labelling fossil gas and nuclear as green <sup>18</sup> (C7)	29.03.2022 Repowering the EU? <sup>25</sup> (C14)
	29.03.2022 It's time to get fossil fuels out of our homes <sup>26</sup> (C15)
	06.04.2022 NGO and stakeholder briefing on the EU gas package <sup>27</sup> (C16)
	04.05.2022

<sup>13</sup> [https://climatenetwork.org/wp-content/uploads/2021/05/CAN-International-Position\\_Fossil-Gas\\_May-2021-2.pdf](https://climatenetwork.org/wp-content/uploads/2021/05/CAN-International-Position_Fossil-Gas_May-2021-2.pdf)

<sup>14</sup> <https://caneurope.org/content/uploads/2021/06/Fossil-Gas-Manifesto-2021.pdf>

<sup>15</sup> <https://caneurope.org/letter-prevent-nuclear-energy-fossil-gas-from-being-labelled-as-green/>

<sup>16</sup> [https://caneurope.org/content/uploads/2021/12/Annex\\_Gas-market-reform\\_211207-1.pdf](https://caneurope.org/content/uploads/2021/12/Annex_Gas-market-reform_211207-1.pdf)

<sup>17</sup> <https://caneurope.org/letter-hydrogen-and-gas-decarbonisation-package-ff55-under-publication-needs-to-improve/>

<sup>18</sup> <https://caneurope.org/the-eu-cant-afford-labelling-fossil-gas-and-nuclear-as-green/>

<sup>20</sup> <https://caneurope.org/after-fossil-gas-companies-record-2021-profits-civil-society-calls-on-renewable-heating-for-all/>

<sup>21</sup> <https://caneurope.org/can-europe-statement-on-war-in-ukraine-and-fossil-fuel-energy-crisis/>

<sup>22</sup> <https://caneurope.org/repowereu-commission-fails-quick-end-fossil-fuels-frontline-precious-funds-energy-transition/>

<sup>23</sup> <https://caneurope.org/open-letter-europe-off-gas-for-peace-and-prosperity/>

<sup>24</sup> <https://caneurope.org/content/uploads/2022/03/8-measures-ENERGY-Ukraine-1.pdf>

<sup>25</sup> <https://caneurope.org/repowering-the-eu/>

<sup>26</sup> <https://caneurope.org/its-time-to-get-fossil-fuels-out-of-our-homes/>

<sup>27</sup> <https://caneurope.org/ngo-and-stakeholder-briefing-on-the-eu-gas-package/>

		<p>Joint NGO statement: Protecting nature and fighting climate change must go hand in hand<sup>28</sup> (C17)</p> <p>06.05.2022 REPOWER FOR THE PEOPLE: NEW REPORT INDICATES HOW THE EU CAN WEAN OFF RUSSIAN FOSSIL GAS BY 2025<sup>29</sup> (C18)</p> <p>06.05.2022 Repowering for the People: Flagship actions the Commission’s plan ‘REPowerEU’ should feature in the current fossil fuel and energy prices crisis<sup>30</sup> (C19)</p> <p>17.05.2022 G10 Letter to Commission on REPowerEU (C20)</p> <p>18.05.2022 EU’S NEW ENERGY PLAN ‘REPowerEU’ SHOULD NOT BECOME A SMOKE SCREEN FOR LOCK-IN TO FOSSIL FUELS<sup>31</sup> (C21)</p>
<b>European Commission</b> (n=4)	February 2 <sup>nd</sup> 2022 Green Taxonomy (Factsheet) <sup>32</sup> (EU1)	<p>18.05.2022 2022/0164 (COD) - Proposal for a REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL<sup>33</sup> (EU2)</p> <p>2022 REPowerEU at a glance<sup>34</sup> (EU3)</p> <p>2022 (last reviewed May 2<sup>nd</sup> 2023) REPowerEU: energy policy in EU countries’ recovery and resilience plans<sup>35</sup>(EU4)</p>

<sup>28</sup> <https://caneurope.org/joint-statement-on-biodiversity-and-energy-transition/>

<sup>29</sup> <https://caneurope.org/repower-for-the-people-new-report-how-eu-wan-off-russial-fossil-gas-2025gy-measures-neglect-the-root-of-the-problem-fossil-fuels/>

<sup>30</sup> <https://caneurope.org/repowering-for-the-people-flagship-actions-the-commissions-plan-repowereu-should-feature-in-the-current-fossil-fuel-and-energy-prices-crisis/>

<sup>31</sup> <https://caneurope.org/eu-energy-plan-repowereu-should-not-become-smokescreen-for-lockin-fossil-fuels/>

<sup>32</sup> [https://finance.ec.europa.eu/system/files/2022-02/sustainable-finance-taxonomy-complementary-climate-delegated-act-factsheet\\_en.pdf](https://finance.ec.europa.eu/system/files/2022-02/sustainable-finance-taxonomy-complementary-climate-delegated-act-factsheet_en.pdf)

<sup>33</sup> <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=COM%3A2022%3A0231%3AFIN>

<sup>34</sup> [https://commission.europa.eu/strategy-and-policy/priorities-2019-2024/european-green-deal/repowereu-affordable-secure-and-sustainable-energy-europe\\_en](https://commission.europa.eu/strategy-and-policy/priorities-2019-2024/european-green-deal/repowereu-affordable-secure-and-sustainable-energy-europe_en)

<sup>35</sup> <https://www.consilium.europa.eu/en/policies/eu-recovery-plan/repowereu/>