

# Public consultation on ACER's Framework Guidelines on the joint scenarios for electricity and gas network development plans ("Scenarios Guidelines")

Fields marked with \* are mandatory.

## Introduction

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This consultation of the European Union Agency for the Cooperation of Energy Regulators ('ACER') is addressed to all interested stakeholders.

The purpose of this survey is to collect specific and concrete views from the public on the draft Scenarios Guidelines and inform ACER's decision-making process for adopting the Guidelines by 24 January 2023.

The draft Guidelines are available [here](#). The consultation questions directly refer to this document. Replies to this consultation should be submitted by Monday **14 November 2022, 23:59 hrs (CET)**

## Data Protection and Confidentiality

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ACER will process personal data of the respondents in accordance with [Regulation \(EU\) 2018/1725](#), taking into account that this processing is necessary for performing ACER's consultation tasks.

More information on data protection is available on [ACER's website](#).

### **ACER will not publish personal data.**

Following this consultation, ACER will make public:

- the number of responses received;
- organisation names, except those with a valid reason for not having their organisation name disclosed;
- all non-confidential responses;
- and ACER's evaluation of responses.

You may request that (1) the name of the organisation you are representing and/or (2) information provided in your response is treated as confidential. To this aim, you need to explicitly indicate whether your answers contain confidential information, and also provide a valid reason if you want that the name of your

organisation remains confidential.

You will be asked these questions at the end of the survey.

## 1. Respondent's Data

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\* 1. Name and surname

\* 2. Email

\* 3. Organisation

\* 4. Country of your organisation

- [xx] - All EU Member States
- AT - Austria
- BE - Belgium
- BG - Bulgaria
- HR - Croatia
- CY - Cyprus
- CZ - Czechia
- DK - Denmark
- EE - Estonia
- FI - Finland
- FR - France
- DE - Germany
- GR - Greece
- HU - Hungary
- IE - Ireland
- IT - Italy
- LV - Latvia
- LT - Lithuania
- LU - Luxembourg
- MT - Malta
- NL - Netherlands
- [xx] - Other
- PL - Poland
- PT - Portugal
- RO - Romania
- SK - Slovak Republic
- SI - Slovenia

- ES - Spain
- SE - Sweden

\* 6. Activity

- Transmission System Operator (or association)
- Distribution System Operator (or association)
- Other market participant
- End-user (or association)
- Energy supplier (or association)
- Generator (or association)
- Utility (or association)
- Civil society organisation
- Other

## Confirmation

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I accept that ACER processes my data in line with its data protection rules

## 2. Consultation questions

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To help the Agency understand your concrete and specific input, we recommend that you connect your feedback as much as possible to the recital numbers in the draft Guidelines.

8. Please write here your specific and concrete feedback on the criteria proposed to ensure a timely scenario preparation process (Section 2 of the draft Guidelines).

9. Please write here your specific and concrete feedback on the proposed criteria to ensure robust objective-driven scenario development (Section 3 of the draft Guidelines).

Recital 30: Scenarios should be allowed to be more ambitious than existing climate and energy policy if these are attainable at lower overall system cost. In this case, assumptions need to be independently scrutinised. In addition, the purpose of the scenario exercise needs to be more clearly defined. Guidance should be added on how the different scenarios lead to decisions over infrastructure investments. Currently, scenarios inform "reactive", project by project decisions rather than amounting to a sensible investment strategy where trade-offs between optionality and cost are transparent and internally consistent.

Recital 31: ACER should provide guidelines on how to build in Energy Efficiency First into modelling ex ante or require the ENTSOs to co-develop them with the SRG. A specific assessment should be included before finalisation of scenarios. Energy efficiency should be assessed at system level across gas and electricity (rather than just focussing on specific "instances" of sector integration as alluded to in the guidelines) and include the option of demand as an active variable in this. We recommend this to be assessed by an external party given criticality to energy security and long-term affordability of any investment plan.

Recital 41: To enable decision making over the future of the network and effective cost allocation, scenarios should be required to help inform decisions on not only expansion but also downsizing of networks. This is critical to keep system and user costs manageable. To do this, one of the publicised data points should thus be expected utilisation rates on different parts of the networks under different scenarios.

Recital 42: Article 12 (3) of the TEN-E regulation defines a set of energy stakeholders to be involved in the SRG. This set is not sufficient to provide skills and expertise required for sound scenario planning. In particular, expertise on changing climatic conditions and climate science more broadly as well as on the digitisation of the energy system needs to be added.

10a. Please write here your specific and concrete feedback on the proposed criteria to ensure a transparent, inclusive and streamlined development process, focusing on the stakeholder engagement requirements (Section 4 of the draft Guidelines, recitals (42)-(48)).

10b. Please write here your specific and concrete feedback on the proposed criteria to ensure a transparent, inclusive and streamlined development process, focusing on the information and publication requirements (Section 4 of the draft Guidelines, recitals (49)-(52)).

11. Please write here your specific and concrete feedback on the process for ensuring independent scrutiny of inputs, assumptions and methodologies (Section 5 of the draft Guidelines).

Recital 54: A strengthening of the independent scrutiny is needed. At the moment the balance of control is with the ENTSOs. In particular, the SRG's advice should be incorporated by default. Deviation should only be possible on an exceptional basis. Binding independent scrutiny on defining the parameters for uncertainty testing should be required.

12. Please write here your specific and concrete feedback on the proposed quick-review process to enable updating a scenario in case key assumptions change (Section 6 of the draft Guidelines).

13. Please write here your specific and concrete feedback on the proposed compliance reporting (Section 7 of the draft Guidelines).

14. Would you like to share anything else with us regarding the draft Scenarios Guidelines?

## Confidentiality

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- \* 15. Your response would be published on the Agency's public consultation web page. Please confirm that:
- My response and name of my organisation can be published
  - My response can be published without my organisation's name (You are asked to give a justification below)
  - My response contains confidential information; a redacted version may be published (Please ensure you marked the specific text by preceding and closing it with [CONFIDENTIAL]. In addition, you are asked to give a justification below)

Thank you!

## Background Documents

[Scenarios\\_Guidelines\\_DRAFT](#)

## Contact

[Contact Form](#)

