

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

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

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

* 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

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

2. Consultation questions

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).

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)).

Edison would like to underline that the stakeholder engagement plan is a key element for a transparent, inclusive and streamlined development process.

We also appreciate the establishment of a "Stakeholder Reference Group" (SRG) as the equal consideration of all stakeholders is important for a successful scenario process. We consider appropriate, to fulfill the inclusivity criteria, that also major national association representing electricity and natural gas operator be part of SRG.

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)).

Edison agrees on a two folded information process. However, we consider vital that also the documents produced for informed stakeholders are published and available for download on ENTOS websites.

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).

The involvement of the Stakeholder Reference Group (SRG) to ensure independent scrutiny of inputs, assumptions and methodologies by a balanced internal discussion is very appreciated.

Edison deems useful that the ENTSOs consider SRG's advice and give explanation to the SRG on how they have considered SRG's advice. If SRG's advice is not considered, ENTSOs should duly justify why the advice has not been taken into account. For this reason, we propose to amend recital (57) as follow:

(57) " The ENTSOs remain at all times responsible for the inputs, assumptions and timely submission of the draft Scenarios Report and are not bound to the advice of the SRG; however, ENTSOs shall explain to SRG how its advice has been considered. Moreover, SRG advice and correlated ENTSOs explanation must be recorded and published in line with the transparency requirements established in section 4"

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).

Recent events have showed that unexpected major circumstances can quickly and substantially change the key assumption at the basis of the scenarios, highlighting, as a result, the importance of scenarios' updating in order to keep them representative and useful. Therefore, Edison supports the introduction of a quick-review process.

Regarding recital (59), Edison firmly believes that the SRG should also be able to trigger a quick review process. In particular, if a considerable number of stakeholders believe that a significant event, that might require the TYNDP scenarios to be adapted, has occurred, they shall be able to notify the Commission, ACER or ENTSOs about this. Consequently, ENTSOs must evaluate the activation of a quick review process.

Regarding recitals (60)-(62), Edison understands that the timeframes for the review process have been defined in order to ensure the agility of the process. However, Edison worries that the timing proposed might be too stringent and, therefore, might hamper the qualitative content of the updated scenario. In this regard, Edison proposes the following amendment in recitals:

(61) "The SRG shall review the proposed amendments and within 4 weeks provide non-binding recommendations to the ENTSOs, taking due account of the process for independent scrutiny, defined in Section 5."

(62) "The ENTSOs shall decide on the scenario adaptations, taking account of the SRG's recommendations, and shall produce amended scenario(s) within 4 weeks after receiving the non-binding recommendations."

Regarding recital (63), Edison understands the decision to update only the central scenario. Nevertheless, Edison believes that a clarification is needed regarding the scenario variants. Specifically, it is not clear whether the non-updated variants would still be considered valid or they would simply decay. In this regard, Edison proposes to amend recital (63) as follow:

(63) "The quick review process shall be performed on the central scenario first. A decision whether to update the scenario variants shall be taken. If ENTSOs deems the scenario variants not relevant anymore, it shall inform all the stakeholders about their decay. Otherwise, ENTSOs shall inform about the decision to update the scenario variants, providing appropriate and clear timeframes."

Regarding recital (64), Edison believes that a public consultation must be run. In this regard, Edison proposes to amend recital (64) as follow:

(64) "In case of a quick review process, the updated scenario(s) need to be publicly consulted. In this case, the public consultation can be shortened to 2 weeks."

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

- * 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](#)