

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).

Enagás welcomes the non-binding draft Scenarios Guidelines prepared by ACER, which aim to establish criteria for a transparent, non-discriminatory and robust development of scenarios taking into account best practices in the field of infrastructures assessment and network development planning, according to Article 12.1 of Regulation (EU) 2022/869 on guidelines for trans-European energy infrastructure (the recast TEN-E Regulation).

Enagás would like to claim ACER's attention to the following topic:

Contrary to the current formulation of Paragraph (29) which states that 'the storyline process is carried out separately from the scenario preparation process and remains applicable for more editions of the TYNDP scenarios', it is necessary to have 'a storyline update process at the beginning of each TYNDP cycle'. This would ensure that storylines and the technology ranges (as part of storyline report) are up to date, in line with the latest EU targets and policies and resulted from stakeholder consultations.

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).

For the shake of clarity, please specify under which circumstances the scenarios shall also consider the NECPs and shall consider the latest Commission scenarios instead of using the formulation “where relevant”.

Scenarios shall build on feasible and broadly supported assumptions about the evolution of energy demand and supply. When it is possible, scenarios shall be built upon assumptions that have already gone through a bottom-up process of consultation and validation at national level such as a national scenario development process.

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)).

In the event the ENTSOs shall extend and amend the assumptions derived from the NECPs to build scenarios that are on-target, please clearly state which assumptions were modified for transparency purposes.

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)).

Enagás supports the idea of creating the SRG. Given the relevance of this Stakeholder Reference Group (SRG) as one of the pillars to ensure independency, it is considered beneficial to make public the list of SRG representatives. In addition to this, it would be desirable to know in advance, which individuals and/or organisations could be part of the SRG.

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 SRG should have the responsibility to provide the advice on time according to the process timeline and stakeholder engagement plan.

The SRG should have access to the information as any other stakeholders do, to avoid any discrimination and it should be ENTSOs' responsibility to provide this information in accordance with the confidentiality requirements.

The ENTSOs remain all times responsible for the inputs, assumptions and timeline submission of the Scenario Report.

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).

In the event that a public consultation cannot be carried out due to time constraints, at least the scenarios and results shall be shared with stakeholders.

The quick review process should be ‘requested’ to be activated by the EC, ACER or either of the ENTSOs together with a clear justification. The activation of the process should be defined clearly in the Scenarios Guidelines as well.

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

Enagás welcomes the request to include compliance reporting within draft joint scenarios report.

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

The forecast energy carrier's demand for the following years should be carefully revised in light of recent European events and analyze its adequacy with REPower EU demand provided by the EC. If the demand is not as low as forecast by the EC, additional problems could overcome: SoS problems which would imply higher costs than the natural gas infrastructures themselves.

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](#)

