

# 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

7. Please specify if 'Other'

gas wholesale, retail and distribution association

## 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).

Concepts such as the energy efficiency-first principle (EE1st principle) should also be interpreted in broader and all-encompassing way, taking into account energy efficiency first principle in accordance with the European Commission Recommendation on Energy Efficiency First (C(2021) 7014 final).

We support the criteria for robust objective-driven scenarios and we appreciate the inclusion of the NECPs as the basis for developing scenarios. However, some flexibility may be required as NECPs are not currently based on local and regional energy plans. Local situations and conditions are very diverse and measures taken at the local level may even go beyond national goals or take slightly different pathways. We emphasise the importance of the bottom-up approach to ensure a just transition towards decarbonisation and renewable gases.

Particularly important is the definition of a set of scenarios that cover the main uncertainties. This is demonstrated by the current energy crisis, but also the challenges of the energy transition. Sensitivity analyses are crucial for robust scenario and necessary to address the uncertainties which are driving the scenario development process.

There seems to be a growing inconsistency between the energy diplomacy efforts, markets announcements and the projected EU 2030 natural gas consumption foreseen in the REPowerEU SWD. This lack of consistency is leading to uncertainties and concerns for market players which hinder investments and infrastructure planning. Eurogas calls for providing clarification on the projections of the 2030 natural gas consumption foreseen by the European Commission taking into account diplomatic statements and establishing sensitivity scenarios to provide the necessary guidance for (infrastructure) investors, and long-term gas buyers, in their decisions towards 2030, including in the TYNDP.

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)).

Eurogas appreciates the establishment of a “Stakeholder Reference Group” as the equal consideration of all stakeholders is important for a successful scenario process. The validation of inputs and assumptions must be done on an equal basis to ensure the same role and the same consideration for all those involved and competent in the field. Furthermore, we welcome the involvement of energy and climate scientists and independent experts as observers. This approach, together with the stakeholder engagement plan, ensures a transparent, inclusive and streamlined development process.

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)).

Eurogas appreciates a two folded information process, differentiating between involved stakeholders and the public in tailoring the data to the target group. However, the format and requirement should be based on an efficient processing and publication by keeping the time required within limits.

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 much welcome. Particularly reflecting both, the majority and minority views. The priority to handle the issues first within the SRG, before consulting the wider advice of the energy and climate scientist and independent experts is appreciated, as it guarantees an efficient and balanced establishment of a robust and non-discriminatory scenario development.

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).

As underlined by the current geopolitical turmoil and the impact of climate change, unexpected events can change key assumption substantially. Therefore, it is important to react in a quick and efficient manner, that's why Eurogas supports the proposed quick-review process.

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](#)