

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).

GD4S would like to highlight security of supply as a fundamental Union energy objective to be achieved in all scenarios over every / the entire time period, . The scenario should fully take into account the recent evolution of the conditions to ensure security of energy supply due to the evolution of both supply and demand structures as well as energy flows inside the EU.

In this respect, we support all scenarios to include stress tests to identify the risks implied by the non or partial fulfilment of the assumptions (renewable development, energy demand reduction and transformation, infrastructure adaptation). The assessment of the energy system resilience to adverse conditions should be extended to the realization of key assumptions structuring the overall results, such as building insulation, electricity renewable deployment path, electrification of light mobility and charging patterns, acceleration of biomethane and green hydrogen production, etc.

The model of optimisation should also be assessed with cautiousness, especially where the assumptions imply some material constrains. For instance, the correlation between energy generation and demand could not necessarily be matched in terms of timing and location. As models could not take into consideration such level of local granularity, the assumptions should be well established. More concretely, the charging of an EV would not necessarily be done when the sun shines the most, at noon, and at the location of the PV panel. Another way to express it, PV at home would not charge vehicles at the working place without adequate hypothesis on networks. Such specific attention to the consistency of the modeling will increase as the energy system is becoming increasingly decentralised.

The EE1st principle should not be restrictively understood and applied as "demand-side response" only. The concept should fully include the efficiency of networks and energy conversions.

The NECPs are key documents as well as the most recent EC scenario. Nevertheless, they should be tested according to the most recent market evolutions and their consistency with EU security of supply requirements should be assessed. We recommend completing the current top-down approach with additional bottom-up considerations to ensure a just transition towards decarbonisation and renewable energy which fully take into account the diversity and constrains of European territories. Therefore, some flexibility in the assumptions and compulsory sensitivity analysis on the key parameters are required to reflect the limits of the modeling and optimization tools as well as the major uncertainties related to the availability or deployment of key technologies and solutions. One could mention the inherent uncertainty on the massive increase of renewable electricity supply, the acceleration of building insulation, the fast deployment of EV etc, over a short period of time while constrains are increasing (local acceptability, cost and delay of equipment supply, increasing pressure on rare primary resources, availabilities of public funding, etc...).

In other words, a "reality check" must be integrated to give a fair view of the realism of the scenarios and key assumptions.

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)).

The diversity of contributors and participations in the process is essential and we welcome the establishment of a “Stakeholder Reference Group”. GD4S has a key concern regarding the balanced representation of key required skills and competences about climate, energy system and markets, for all the involved energy sources in all geography of the EU. Without such level of representativity, the risk would be to lack technical and market expertise and understanding. It would further risk to encourage the promotion of a limited number of the best known solutions by the experts without ensuring sufficient openness to other technologies.

GD4S would like to emphasize the needs to involved experts with experience of the energy system at local or regional levels.

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).

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 mentioned about the question 9 above, the exercise should integrate as much as possible adverse and material conditions that could put at risk the key assumptions and evolution. This goes through a “reality check”, risk assessment with sensitivity analysis, etc. In addition, GD4S welcomes a quick-review exercise to update or complete the scenarios.

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](#)