

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

7. Please specify if 'Other'

TSO and DSO

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).

GNI supports ACER's proposal to remove the storyline development process from the bi-annual scenario development process. Doing so should help to reduce the overall development timeline. That being said, if and when it becomes necessary to update the overarching scenario storylines, consideration should be given as to the time needed for the ENTSOs to develop their processes, models and input data to implement the new storylines. A lead in time should be therefore built into the update process to ensure these changes cannot occur within a scenario cycle and would only apply to future scenario cycles.

Secondly, in respect to ensuring alignment of the 2024 cycle with the updated National Energy and Climate Plans, due to be published in June 2023. This will be extremely difficult to achieve given the level of stakeholder engagement and public consultation that is required during the scenario development process. For example, under the 2024 cycle, gas and electricity TSOs at a national level are already being asked to input data on supply and demand figures to allow the ENTSOs to develop their models. By waiting until after June 2023 to start this process, it would not be possible to have a robust draft scenario report for December 2023. For each scenario cycle, there must be a cut-off date to which compliance with energy and climate policy will be assessed against and future policies after this point will not be included until the next cycle takes place.

Finally, as a more general point, the current scenario development process is already a robust and inclusive process, involving inputs from gas and electricity TSOs from across Europe as well as significant stakeholder engagement throughout the process. To some extent, this success comes at a trade off in the time taken to deliver the scenario process, with the timeline from commencing the process to the completion of the final TYNDP report, which is ultimately the purpose of the scenario report, taking a couple of years. Any further additions in terms of complexity into the scenario development process must be assessed against this extra time and resources required to deliver them.

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).

1. Alignment with EU Climate Targets

GNI supports the proposal to align scenarios with EU and Climate targets and that any central scenario should be fully aligned with EU policy. However, there may be merit in considering additional sensitivities to ensure that the infrastructure needs of the energy system can still be planned efficiently if certain targets are not met or if they are exceeded. As we have seen in recent years, energy and climate policy can change significantly, even in the short to medium horizon, and therefore having sensitivities around the longer-term scenario horizons allows for the scenarios to remain robust in light of any such changes.

2. Inclusion of the Energy Efficiency First Principle

Delivering energy efficiency requires consumers to make significant changes and new innovative technologies to be developed (e.g. modal shifts in transport). Given that ENTSOs and TSOs have little control over these developments, it is important to be pragmatic in considering energy efficiency within the context of these scenarios. Ultimately, the purpose of these scenarios is to undertake an adequacy assessment and identify energy system needs and therefore it is important that they are developed to cater for higher and lower energy consumption than the centrally aligned scenario. As the recent energy crisis has shown, a secure and resilient network is essential to delivering cost efficient energy to consumers and infrastructure bottlenecks need to be assessed and identified in the context of a wide variety of sensitivities.

3. Alignment with National Energy and Climate Plans

Whilst scenarios should aim to align with both national and EU energy and climate policy, the reality is that the timelines for developing and publishing NECPs is not aligned with the scenario development process

and this is outside of the control of the ENTSOs / TSOs feeding into the scenario process. Additionally, it is important to note that national policies set out in NECPs do not always fully align with EU energy policy, i.e. there may be an ambition gap between the two. ACER needs to consider and provide guidance on how such data conflicts should be prioritised.

4. Ensuring Agility in the Scenario Development Process

GNI supports the ambitions to make the scenario development process as agile as possible. However, data inputs are provided by TSOs across 27 member states. There is also significant stakeholder engagement required throughout the development process. The time and effort required to collect and agree on data limits how agile this process can be. That being said, the proposal to introduce a quick review process may provide a mechanism to allow scenarios to become more agile as the case requires, but still retain the robust oversight and governance that has typically been applied to the process to date.

5. A move towards a more bottom up scenario development process

Under the revisions proposed on the gas markets package, each member states TSOs will develop a joint scenario framework across the energy carriers out to 2050 which is fully compliant with EU policy. Under this context, a move towards a more bottom up approach to scenario development at an EU level makes sense. However, in the absence of this, there is often a lack of agreed and verified data at a national level which aligns with the parameters for the EU TYNDP process and it is therefore not always possible to have informed bottom up scenarios. Given TSOs current remit is to only undertake a network development plan for a 10-year horizon and focused on their own network, it will be difficult to deliver comprehensive bottom up scenarios until this remit changes.

6. Time horizons for scenario development

GNI is of the view that 5-time horizons are too many and that this should be reduced to a short (0-9 year), medium (10-15 year) and Long Term (2050) scenario. The ENTSOs should have some discretion around the exact year chosen once it is in the horizon window. This would allow easy comparison for certain EU policy reference years such as 2030 and 2050.

7. Sensitivities for scenario assessments

GNI is of the view that the current ENTSOs scenarios work effectively. It is difficult to determine the benefits of a low / high economy sensitivity without detailed storyline proposals to better explain its merits. Rather than defining new additional scenarios in the ACER framework guidelines, these should be consulted on through the development of the ENTSOs storylines.

As a more general observation, more scenarios and sensitivities create significantly more workload during the development process the time / resources to deliver them needs to be weighed up. When developing new storylines, there needs to be a lead in period to create the models and processes to implement them. This should not take place during a scenario development cycle but rather should apply to future cycles after a lead in period.

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)).

GNI supports the requirement for the ENTSOs to develop a publish a timeline and stakeholder engagement plan at the start of each scenario process.

GNI supports the establishment and use of a Stakeholder Reference Group to provide feedback and independent scrutiny of the scenario process. One of the core issues of stakeholder feedback currently is feedback comes from individual groups with vested interests and often conflicting views. The establishment of an SRG can help to form a coherent and agreed view across these groups. However, it will be important to regularly review the membership of this group so as to ensure a balanced group of stakeholders. As many of the associations will have their own vested interests, achieving an unbiased view from the group cannot be achieved without this.

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)).

GNI has no specific comments on the data proposed to be published during the scenario process, noting that much of this data is already made available by the ENTSOs.

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).

GNI supports the establishment and use of a Stakeholder Reference Group to provide feedback and independent scrutiny of the scenario process. One of the core issues of stakeholder feedback currently is feedback comes from individual groups with vested interests and often conflicting views. The establishment of an SRG can help to form a coherent and agreed view across these groups. However, it will be important to regularly review the membership of this group so as to ensure a balanced group of stakeholders. As many of the associations will have their own vested interests, achieving an unbiased view from the group cannot be achieved without this.

Secondly, GNI is fully supportive of the proposal that the ENTSOs are not bound to accept / implement the feedback being provided by the SRG and the option to engage with energy and climate experts where the group fails to deliver a consensus of opinion on certain matters.

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).

GNI supports the inclusion of a quick review process into the scenario development process. Specifics on the exact process for progressing such changes may be best determined on a case by case basis, subject to the ENTSOs ability to implement the changes required and the urgency required for the changes to be implemented.

It will also be important to consider under such a process if the full scenario report is required to be re-written and published again, or whether the changes just impact the modelling used for the system needs assessments for the TYNDP and how this should be communicated in an open and transparent manner.

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

GNI supports the inclusion of compliance reporting within the scenario report itself, as opposed to a separate standalone report.

Secondly, GNI is of the view that ACER and the Commission need to take a pragmatic approach in respect to the 2024 TYNDP cycle. The scenario develop process for TYNDP 2024 kicked off in early 2022 and will be well progressed by the time that the final ACER scenario guidelines are published in January 2023. Therefore, as a new process being implemented for the first time, compliance assessments for the 2024 cycle should be considered as suggested improvements for the 2026 cycle, rather than a non-approval issue.

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

Overall, GNI is broadly supportive of the framework guidelines set out by ACER. That being said, there are a number of areas as outlined above that should be considered:

1. Given the scenario development process for TYNDP 2024 has already commenced, a pragmatic view must be taken during this scenario cycle in terms of compliance with these guidelines.
2. National policy and European policy are not always fully aligned. Therefore, the proposal to utilise bottom up scenarios but also fully align with EU policy goals is not always possible and can put the TSOs whom are required to provide this bottom up data typically in a difficult position if they are required to submit data which is not aligned with national views.
3. The current scenario process is already a robust and transparent process. As a result, the timeline from commencement to delivery is substantial. Adding additional sensitivities and time horizons to the process may result in this timeline being extended further. Therefore, any additional complexities need to be weighed against the trade off of extra time to deliver them.
4. Each scenario process takes time to implement. There needs to be lead in times for any changes to the scenario story lines and a data freeze point in relation to energy and climate policies to be considered for each cycle.

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](#)