

# 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).

Recital 30)

The Russian invasion in Ukraine has impacted heavily the global and European energy sector and will continue to do so. Among other terrible socio-economic consequences it has created the biggest energy crisis of the last decades and showed how unprecedented external shocks can change the course of history and shake the development path of a whole sector. It has become evident that the EU needs to phase out natural gas at a much faster rate than anticipated. It is therefore crucial that the ongoing TYNDP 2024 cycle can adequately account for this and the geopolitical crisis' further impact on the EU's energy policy. It is already clear that the ongoing Fit-for-55 and RePowerEU negotiations will result in much more ambitious decarbonisation goals in order to decrease dependence on natural gas. We consider it therefore mandatory that the development of scenarios must account for most recent political decisions and status of political negotiations on a European but also national level (e.g. NECPs). If not, TYNDP 2024 carries the imminent risk of being outdated the moment it has been finalised and published.

Recital 39) & Footnote 17

Building on our comments regarding Recital 30, it is paramount importance to understand that while the factor economic growth can account for the impact of the current crisis on the EU's economic activity, it risks not to incorporate the consequences of this specific crisis on electrification rates. With electrification being the major driver for decarbonisation it is highly advisable to include scenarios "moderate & ambitious electrification". Equally, given very optimistic import rates (e.g. hydrogen) being debated for the future and a general political strive for energy independence, it is crucial to include scenarios "high vs. low energy import". Specifically with respect to imports from Russia it is neither likely that they will go up again nor will they be fully substituted by alternative fossil imports like LNG.

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)).

Recital 43)

The creation of a Stakeholder Reference Group is an important element to ensure appropriate consultation. However, recital 42)-52) are not clear regarding the date by when this group has to be created. In view of the TYNDP cycle this has to be as early as possible in Q1/2023.

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).

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](#)

