

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'

Research on Energy System

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).

#30

The respondent fully supports ACER's statements in this article. In fact, scenarios aim to assess the needs for infrastructural developments, implied by the energy policy and objectives under consideration. Accordingly, it is fundamental that scenarios developed by the ENTSOs closely match the European policies, targets and objectives, including NECPs where relevant, and comply with the energy-efficiency-first principle. These directions appear not to have been always fully met so far.

Of course, the analysis of scenarios based on different assumptions remains at ENTSOs' decision, however these additional scenarios should be specified in terms of sensitivity with respect to the European reference scenarios.

#31

Specific assumptions on the inclusion of the EE1st principle in the energy system are certainly very important but also difficult to verify without any explicit criteria, especially if the scenarios are built with drivers other than NECPs.

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)).

#42-43

"the ENTSOs shall create a Stakeholder Reference Group ('SRG'), comprised of (at least) the key stakeholders."

The SRG should include National scenario experts, whose contribution may regard in particular the update scenarios to ensure and facilitate consistency with official NECPs (also see item #35). National scenario experts would also assure that a non-stakeholder view is represented in the scenario building 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)).

#51

The topic of replicability/reproducibility of scenarios for informed stakeholders is crucial to achieve greater transparency and allow performing in-depth analyses by the informed stakeholders. Every effort aimed to increase the ability to replicate/reproduce the analyses should be pursued, within the limit set by confidentiality or commercial constraints.

An increasing amount of data has been made available in the recent years, however they are still not enough to completely reproduce the input data sets.

- a) As far as electric scenarios are concerned, it is suggested that data and models are standardized, in well documented and accessible formats such as those of ANTARES, an open source tool already widely used at European level for zonal studies. A process towards the integration of data (with the exception of confidential and commercially constrained data) into such tool would surely be beneficial.
- b) In the list of #51 there is confusion between scenarios and TYNDP results, hence a clearer distinction should be applied.
- c) It is not clear whether, or at which step ENTSOs actually run models, this aspect needs to be clarified.
- d) Methodologies and assumptions should be published in addition to data, to assure reproducibility.
- i) Boundary conditions such as main commodity import (e.g. H2) profiles, quantity and relevant policy assumptions, should be clarified.
- ii) As far as data are concerned, in addition to the information that is already published, other data should be provided to allow replicating and reproducing the scenarios. This includes NTC profiles and flows from exogenous regions. As regards flow-based analyses, the Power Transfer Distribution Factor (PTDF) matrix would be needed, specifying whether and when it is actually used.
- iii) As for the technologies, data regarding biofuels (technology, price of fuel, CAPEX and OPEX, efficiency, specification of co-firing...), hydro (including inflows, maximum volumes, efficiency etc.), BESS (CAPEX, max/min charge level, charge/discharge efficiency), CHP profiles, as well as models of hydrogen /P2X would be needed.
- iv) More information about operation of gas networks

The above data have not been published in detail in previous TYNDP editions.

- e) #51 distinguishes between informed stakeholders from the wider public. In this regard, the information referred in the third bullet point should be distinguished too, for instance item iv) of the third bullet mentions both detailed description and visual information, which might be relevant to the informed stakeholders and the wider public, respectively.

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).

#55

“In case the SRG cannot reach a significant majority view, the ENTSOs are encouraged to seek further independent advice from energy and climate scientists and independent experts”.

It may be questioned why “energy and climate scientists and independent experts” are only involved at this late stage, and only in case of lack of previous agreement. They should rather be involved earlier, at least as observers, also see #43.

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).

#59

The significant event that triggers the quick review should be better defined: it is preferable to talk about events with impact on main target policies rather than impact on assumptions.

#62

The maximum time of 3 weeks after receiving the non-binding recommendations of the SRGs to producing new scenario seems too tight a time, at least 1 month is needed.

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](#)