

# 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

## 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).

T&D Europe overall supports defining specific criteria for ensuring the scenario preparation process is clearly detailed in a timely manner.

In particular, we support Recital 28 for the increased alignment of the NECPs with the Network Development Plans, including on the targets outlined in the scenario preparation.

It is key that Member States, which are often basing their Network Development Plans on the targets in the NECPs, are able to evaluate the content of these plans based on the most up to date targets the NECPs aims for, in line from the EU's increased energy objectives.

Such alignment can be achieved with the draft recommendation to have a streamlined scenario preparation process, in particular for the TYNDP 2024 scenarios.

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).

We strongly support Recital 30 and 31 to ensure that the energy efficiency first principle is taken into account when developing the scenarios, among other considerations, such as ensuring that sector integration is taken into account electrification, heating, hydrogen, industry decarbonisation and digitalisation.

To ensure increased robustness for objective-driven scenarios, we favor including smart sector integration rather than only sector integration, as we believe the smartness component enables stronger links between the sectors mentioned above (n.b. electricity, buildings, industry sectors, hydrogen).

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)).

T&D Europe strongly supports the open process to involve relevant stakeholders including the T&D industry. The energy transition is, among other dimensions, a technological transformation and is very likely that future networks will require other technical solutions than in the past. Hence, involving technology providers' knowledge does not only make sense, it is even crucial.

In addition, such involvement is in line with the TEN-E Regulation to ensure collaboration and effective discussions with the EU DSO entity, utilities, other associations involved in electricity and hydrogen markets, and those involved in energy efficiency solutions, among others.

Keeping the discussion open and having a balanced view ahead of the upcoming TYNDPs by including a wide range of stakeholders, including the T&D industry, is crucial to ensure the scenarios are solid and provide solutions in future planning.

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)).

We welcome a transparent and inclusive process to develop the assumptions, models and scenarios for the NDPs.

However, we would like to see as part of the proposed criteria a dedicated chapter on the forecasting in future product and service volume needed to enable the scenarios to be developed for network development purposes. This means developing an assessment on what exactly will be needed in terms of products and services (e.g. substations, transformers, switchgears) to enable scenario-building. This request reflects the extraordinary change and growth situation the energy transition is implying. In this situation technology providers will need to expand their capacities. The more transparency and certainty they will get, the faster they will manage the required planning activities.

We thus recommend adding an amendment to the Recital 51 for ENTSOs to make available information for informed stakeholders on the forecasted product and service volume needed to achieve the objective-driven scenarios.

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).

One question we would like to raise is to what extent this process would and should be made public. Another important question is about the governance of the SRG. Here it is said that it should decide by majority, we assume this needs to be defined more in detail, otherwise the group may easily become stuck.

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).

We believe all members of the SRG and to ACER and the ENTSOs should be able to request the quick-review process, thus not only the Commission, ACER and the ENTSOs. The decision can then be made by a smaller group including the Commission, ACER and ENTSOs. If this is already what is meant in the proposal, we suggest making it clearer to avoid confusion.

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

NA

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

T&D Europe has been involved in past consultations on ENTSOs' joint Scenario Report for TYNDP. We work very closely with DSOs/TSOs and at EU-level (n.b. ENTSO-E, ENTSO-G & EU DSO) to ensure a resilient power transmission and distribution infrastructure.

Could we, the technology providers for T&D, be included in the 'Activity' section of this stakeholder consultation? As this consultation deals with technical infrastructures, we believe technology providers should be directly in the list, other than just under 'other market participants'.

We would like to reiterate that in the current process for developing scenarios, scenario planning must consider the priority of electricity as the backbone of the future energy system. Hence, the electricity sector needs to be in the lead when developing scenarios. Second, scenario planning needs to take into account technical requirements and opportunities of the infrastructures. There needs to be a stronger link between scenarios of the development of demand and supply and consequences for the connecting grids.

We also strongly support the alignment of the objective-driven scenarios in the TYNDPs, NDPs and NECPs including a forecast on product and service volume needed to avoid delays in deliveries. This forecasting requirement is a crucial element to move forward with the energy transition and provide some answers to the other uncertainties for energy networks planning in the next 10 years.

## 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](#)