

## **Public Consultation**

**on**

# **Framework Guidelines for the joint TYNDP scenarios to be developed by ENTSO for Electricity and ENTSO for Gas**

**PC\_2022\_EG\_09**

## **Evaluation Report**

**11 January 2023**

## **1. INTRODUCTION**

### **1.1 Background**

Every two years, the European Network of Transmission System Operators for Electricity (ENTSO-E) and for Gas (ENTSOG) prepare joint scenarios that set the basis for the future network development planning in the European Union.

Scenarios include a set of assumptions about energy demand and supply evolutions which aim at supporting the biennial Union-wide Ten Year Network Development Plans (TYNDPs). These TYNDP processes feed into the identification and selection of Projects of Common Interest, which play an important role in making the infrastructure ready to achieve the energy and climate policy objectives.

The TEN-E Regulation<sup>1</sup> requires that the TYNDP joint scenarios must be transparent, non-discriminatory and robust. Article (12) of the same Regulations requires ACER to publish framework guidelines, aimed to guide the ENTSOs when developing network scenarios.

### **1.2 Purpose and objectives**

To ensure these TYNDP scenarios meet the criteria of transparency, non-discrimination and robustness, and are as well in line with the European Union's climate and energy objectives, ACER is adopting TYNDP Scenarios Guidelines. ENTSO-E and ENTSOG shall follow these Guidelines for developing the joint scenarios. In order to make an informed and inclusive decision on its TYNDP Scenarios Guidelines, ACER collected views from stakeholders on a draft of the Guidelines.

### **1.3 Timeline**

ACER organised a public consultation from 6 October until 14 November. In parallel, ACER consulted Member States from 17 October until 14 November. ACER also received input from the European Union's Scientific Advisory Board on Climate Change ('SAB') on 14 November 2022.

## **2. PROCESS**

All responses were reviewed per consultation question to identify key themes brought forward by the respondents. The key themes were further analysed into a short description, stakeholders' support and/or disagreement regarding ACER's view prescribed in the draft TYNDP Scenarios Guidelines, and further considerations/suggestions when relevant.

Additionally, ACER reviewed the SAB's input with respect to how to ensure compliance of scenarios with the Union's 2030 targets for energy and climate and its 2050 climate neutrality objective (documented in a separate note).

ACER has considered all the key themes when revising and finalising its TYNDP Scenarios Guidelines. The ACER views column summarises how comments have been taken into account into the final Guidelines.

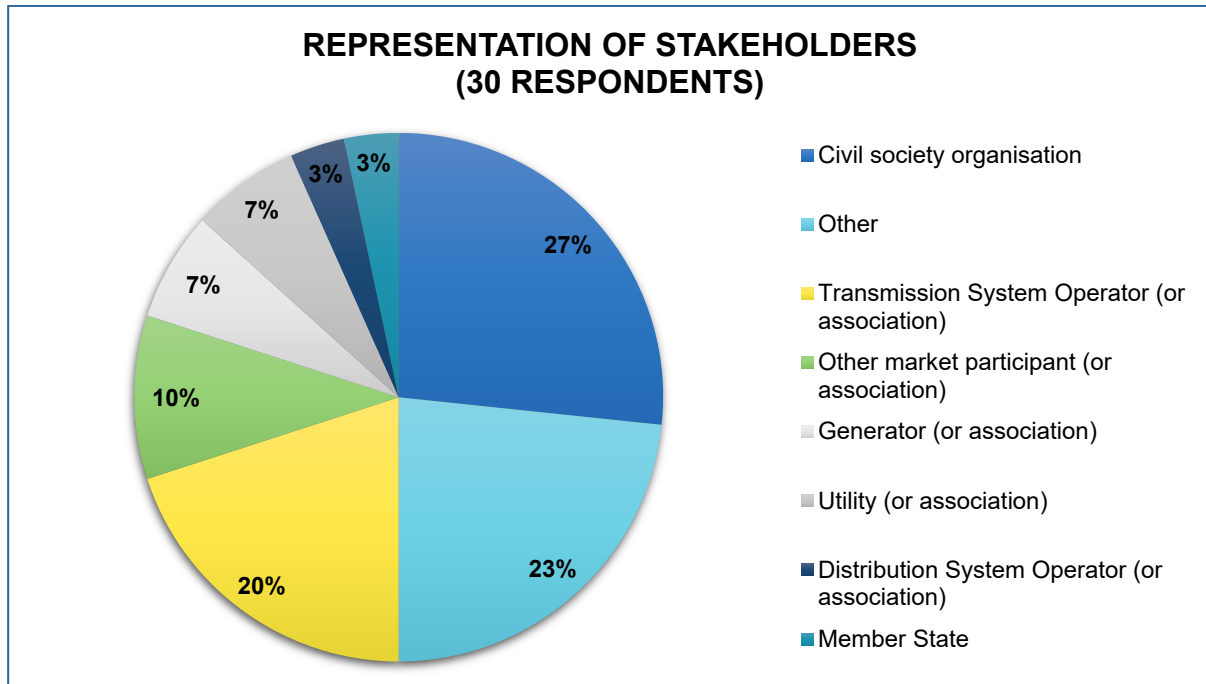
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<sup>1</sup> [https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=uriserv%3AOJ.L\\_.2022.152.01.0045.01.ENG&toc=OJ%3AL%3A2022%3A152%3ATOC](https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=uriserv%3AOJ.L_.2022.152.01.0045.01.ENG&toc=OJ%3AL%3A2022%3A152%3ATOC)

**3. STAKEHOLDER ANSWERS**

28 stakeholders responded to the public consultation and 1 Member State responded to the consultation of Member States. One respondent requested not to be identified by name and this party is identified in this document as ‘Respondent1’.

Respondents who marked their activity as ‘other’ were active as research institutions/think tanks, association spanning the whole supply chain or combined transmission/distribution system operator. The list of respondents is available in Annex I to this document.



*Reader’s note:* it should be noted that recital numbers used by the consultation respondents refer to the consultation document published on ACER’s consultation web page, whereas references by ACER refer to the recitals in the published TYNDP Scenarios Guidelines.

**3.1 Feedback on the criteria proposed to ensure a timely scenario preparation process (Section 2 of the draft Guidelines)**

17 respondents provided comments on this question: [T&D Europe, Gas Networks Ireland (GNI), Terna S.p.A., Deutsche Umwelthilfe e.V., Respondent1, Ember, currENT Europe, Renewables Grid Initiative (RGI), EDF, Enel SpA, ENTSO-E, Enagas, Eurelectric, Germanwatch e.V, Climate Action Network (CAN) Europe, ClientEarth, Regulatory Assistance Project (RAP), ENTSOG]

Respondents’ comments	ACER views
<b>TIMING AND PLANNING</b>	
<b>Description of the theme/issue:</b>	ACER believes the proposed timeliness elements correspond to the observed practices of the ENTSOs and expectations to have a

Respondents' comments	ACER views
<p>Respondents pointed out doubts related to the timing strictness, the possibility to allow for appropriate stakeholders discussion, the relation and combination of different document timings in the built of the TYNDP and asked for a more strict time planning already in the SG.</p> <p><b><u>Stakeholders' disagreement:</u></b></p> <ul style="list-style-type: none"> <li>Disagreement on strict timeline planning, outside of SG mandate, Article 12 TEN-E. [ENTSOs]</li> <li>Given the approval process time needs, the timing is too strict to develop the TYNDP after the approval of the Scenarios. [Terna Spa, Respondent1]</li> </ul> <p><b><u>Stakeholders' considerations/suggestions:</u></b></p> <ul style="list-style-type: none"> <li>Opt for a more strict timing definition [T&amp;D Europe, Deutsche Umwelthilfe e.V., Climate Action Network (CAN) Europe, ClientEarth]</li> <li>Provide milestone to freeze the input parameters before 31 December of even-numbered years [ENTSOs]</li> <li>Strict timing to have appropriate stakeholders' feedback [Deutsche Umwelthilfe e.V., Respondent1]</li> <li>ENTSOs should offer updates to stakeholders regarding the advancement of their scenario building in a more regular way [CAN]</li> </ul>	<p>timely completion of the whole TYNDP process; already covered in TYNDP Scenarios Guidelines (17)-(19). Expectations regarding the process time plan have been clarified.</p> <p>ACER does not agree with including a cut-off date on 31 December of the even year as it would imply that more than 24 months would pass between inputs and selection of PCIs. ACER is of the view that the assumptions and data used in the construction of scenarios are as up-to-date as possible (19).</p> <p>The idea of a cut-off date could be helpful, but such a date shall not be fixed in the Guidelines; ENTSOs shall propose a cut-off date together with the SRG and agree on it with the Commission and ACER.</p> <p>ACER understands the concern about the approval step that has been added and emphasises that the ENTSOs must streamline their scenarios development process to ensure timely delivery.</p> <p>ACER understands that stakeholders would appreciate regular updates on the progress of the process and be able to provide feedback; these aspect are covered by the requirement to have a detailed process time plan and stakeholder engagement plan. These plans shall be prepared and communicated at the start of the process and would accommodate to these needs (46). Expectations regarding the process time plan have been clarified in Section 4.</p>
<h3>SCENARIO TIMEFRAMES (SECTION 3)</h3>	
<p><b><u>Description of the theme/issue:</u></b></p> <p>Respondents have different views related to long-term scenarios: some respondents argue the difficulties in long-term planning related to uncertainty, while others pointed out the necessity to start from the long-term planning and from there, build short-term scenarios to be able to meet long-term targets.</p> <p><b><u>Stakeholders' support:</u></b></p> <ul style="list-style-type: none"> <li>Long-term scenarios should not have the same level of detail as short term due to uncertainties and costs. [Terna Spa]</li> </ul>	<p>ACER agrees that the level of detail of the (very) long-term timeframe may be different than for the short-, mid- and long-term (up to 15 years) timeframes. Nevertheless, the modelling of scenarios, up to 2050, must allow benchmarking of indicators with respect to the 2050 timeframe, for instance, to ensure compliance with the carbon-neutrality objective. (33)</p>

Respondents' comments	ACER views
<p><b><u>Stakeholders' considerations/suggestions:</u></b></p> <ul style="list-style-type: none"> <li>• Optimal network scenario needs to be defined as the reference grids needs for 2030, 2040 and 2050 time frames and from there applied back to short term scenarios. [currENT Europe]</li> <li>• Go beyond 15 year time horizon [currENT Europe]</li> </ul>	
<h3>STORYLINE DEVELOPMENT</h3>	
<p><b><u>Description of the theme/issue:</u></b> Respondents expressed different views related to the separation of the storyline process from the scenario process and pointed out the necessity to update the storyline every TYNDP process.</p> <p><b><u>Stakeholders' considerations/suggestions:</u></b></p> <ul style="list-style-type: none"> <li>• Remove the storyline process from the biennial scenario development process [GNI, EDF]</li> <li>• Separated only for the first year then repeated at least one year before the final consultation [Eurelectric]</li> <li>• Support if independent assessment involving the European Scientific Advisory Body on Climate Change (SAB) and other researchers and civil society stakeholders. [CAN]</li> <li>• Only if reviewed depending on changing circumstances [RAP]</li> <li>• Storyline should be updated before very TYNDP process [Ember, RGI, ENTSOs, Enagas]</li> </ul>	<p>ACER agrees with the respondents that the ENTSOs, together with the SRG, shall confirm the storylines, or decide to open the storyline topic. This check shall take place before the (quantitative) scenario preparation process. While storylines may remain stable, the assumptions within a quantitative scenarios shall be updated for each cycle.</p> <p>The development of a 'national trends+' scenario and high/low economy variants (as stress tests) are required by the Guidelines for meeting the needs of decision makers, including regulatory authorities.</p> <p>When additional (optional) scenarios are added to the set of scenarios, sufficiently contrasting variants shall be built.</p> <p>ACER recognises that the concepts of storylines, scenarios, drivers and assumptions may be confusing and attempted to reduce the number of concepts</p> <ul style="list-style-type: none"> <li>• Storylines offer qualitative descriptions of possible futures that correspond to quantitative scenarios;</li> <li>• Quantitative scenarios differ along key assumptions that correspond to uncertainties surrounding network development</li> </ul>
<h3>OTHER POINTS OF NOTE</h3>	
<p><b><u>Stakeholders' considerations/suggestions:</u></b></p> <ul style="list-style-type: none"> <li>• Trade-off between additional complexity in the scenario development process and time and resources needs. [GNI, Terna SpA]</li> <li>• NEPCs come after EE1st, the EU targets for 2030 and the 2050 climate</li> </ul>	<p>ACER agrees that there is a relationship between sophistication of the scenario development process and the resources needed. The Regulation requires that the ENTSOs develop compliant scenarios and the ENTSOs must allocate adequate resources to complete their mandated tasks. ACER recommends in new (22) that the ENTSOs</p>

Respondents' comments	ACER views
<p>neutrality objective. Policy compliance precedes process streamlining. [Client Earth]</p> <ul style="list-style-type: none"> <li>A consultation should be carried out on storyline consistency and inputs in demand and supply data based on preliminary ranges connected to storyline options [ENEL]</li> </ul>	<p>prepare a roadmap for innovation to increase transparency on the sophistication efforts.</p> <p>The Agency understands ClientEarth's comment that scenarios should comply with the Union's policies and legislation. The Guidelines require that all scenarios be compliant as this requirement is laid out in the TEN-E Regulation. The Guidelines do require that NECPs are used as a basis for constructing scenarios with any NECP derived inputs brought in line with the most recent policy targets, if these targets have not been already implemented in the NECPs themselves (31). The joint scenarios serve to support network development decisions and must fit in that process; streamlining that process ensures up-to-date information is available for decisions.</p> <p>ACER agrees that inputs to a scenario should be consistent with the assumptions and lead to a scenario that complies with the policies; where bottom-up data (such as data derived from NECP input) is not already in line, it shall be brought in line with the Union's latest policies</p>

### 3.2 Feedback on the proposed criteria to ensure robust objective-driven scenario development (Section 3 of the draft Guidelines)

28 respondents provided comments on this question: [EASE, T&D, Eurogas, GNI, Terna S.p.A, Deutsche Umwelthilfe e.V., FGSZ Ltd., Ember, currENT, Edison, EDF, Enel SpA, ENTSO-E, ENTSG, Enagas, Eurlectric, RSE, CAN Europe, ClientEarth, E3G, Copenhagen School of Energy Infrastructure, RAP, GIE, Orsted, Germanwatch e.V., Bellona Europe, RGI, GD4S]

Respondents' comments	ACER views
<b>INCLUSION OF ENERGY EFFICIENCY FIRST PRINCIPLE</b>	
<p><b>Description of the theme/issue:</b> Respondents shared their views regarding the inclusion of EE1st principle on the supply side and on the demand side of the energy system.</p> <p><b>Stakeholders' support:</b></p> <ul style="list-style-type: none"> <li>Welcomed by [T&amp;D, GNI, DeutscheUmwelthilfe, EDF, ClientEarth, RAP, Eurogas, GD4S, currENT, RGI, German Watch, Bellona Europa, E3G]</li> </ul>	<p>ACER finds the requests for more guidance on the EE1st principle reasonable and included a reference to the Commission Communication on the topic and the energy efficiency directive. COMMISSION RECOMMENDATION (EU) 2021/1749 of 28 September 2021 on Energy Efficiency First: from principles to practice — Guidelines and examples for its implementation in decision-making in the energy sector and beyond</p>

Respondents' comments	ACER views
<p><b><u>Stakeholders' considerations/suggestions:</u></b></p> <ul style="list-style-type: none"> <li>7 of respondents ask ACER to clarify and broaden the EE1st inclusion apart from supply and demand side e.g. to system level [Eurogas, GD4S, currENT, RGI, German Watch, Bellona Europa, E3G]</li> </ul>	
<p><b>BOTTOM-UP APPROACH AND POLICY ASSUMPTIONS</b></p>	
<p><b><u>Description of the theme/issue:</u></b></p> <p>Respondents commented on the fact that scenarios shall build on feasible and broadly supported assumptions about the evolution of energy supply and demand and based on a bottom-up approach.</p> <p><b><u>Stakeholders' support:</u></b></p> <ul style="list-style-type: none"> <li>Bottom-up approach is welcomed [Eurogas, GNI, Terna, ENTSOs, Enagas]</li> </ul> <p><b><u>Stakeholders' considerations/suggestions:</u></b></p> <ul style="list-style-type: none"> <li>Non-binding/more ambitious assumptions should be included [EASE, Deutsche Umwelthilfe e.V, Respondent 1, Ember, EDF, E3G, Copenhagen School of Energy infrastructure, RAP]</li> <li>The proposal to utilise bottom up scenarios and also fully align with EU policy goals is not always possible and can put the TSOs in a difficult position if they are required to submit data which is not aligned with national views. [GNI]</li> </ul>	<p>ACER emphasises that TYNDP scenarios are not policy scenarios for choosing the ambitions. The ENTSOs must build scenarios that achieve the politically decided ambition level and it is necessary that those scenarios reflect national differences. The bottom-up approach facilitates this.</p> <p>ACER recognises the need for the ENTSOs to update their scenarios to new policy targets once those are adopted and amended the recital (23) accordingly.</p>
<p><b>NATIONAL ENERGY AND CLIMATE PLANS (NECP) AS A BASIS FOR DEVELOPING SCENARIOS</b></p>	
<p><b><u>Description of the theme/issue:</u></b></p> <p>Respondents shared their views on the usage of NECPs to form a reference point for scenario development but shall be extended and amended to ensure compliance with the policies and the time horizon.</p> <p><b><u>Stakeholders' support:</u></b></p>	

Respondents' comments	ACER views
<ul style="list-style-type: none"> <li>Support the alignment of the objective-driven scenarios in the TYNDPs, NDPs and NECPs including a forecast on product and service volume. [T&amp;D Europe]</li> <li>ACER should provide guidance on how to amend them [GNI, Enagas, CAN, RGI, Germanwatch e.V.]</li> <li>Scrutiny is required for NECPs as well [Ember, GD4S, Copenhagen school of Energy Infrastructure]</li> <li>NECPs should be complemented with the latest COM and M.S. proposals [Eurolectric, Orsted, RSE, EDF, CAN]</li> </ul> <p><b><u>Stakeholders' disagreement:</u></b></p> <ul style="list-style-type: none"> <li>Instead of NECPs, ENTSOs should be required to consult with the SAB to arrive at an up-to-date assessment of the EU's climate and energy targets as well as available Commission developed and independent scenarios [Deutsche Umwelthilfe e.V]</li> <li>Alignment with NECPs seems risky as they became outdated already after they were adopted and might undermine the aim of a timely scenario building process. [CAN]</li> <li>NECPs should not necessarily be the primary basis for scenario development, while their amendment should not be left to the ENTSOs alone and shall incorporate SRG. [ClientEarth]</li> </ul> <p><b><u>Stakeholders' considerations/suggestions:</u></b></p> <ul style="list-style-type: none"> <li>Difficulties in including NEPC 2023 into TYNDP 2024 timely. [GNI, Ember, ENTSOs, RGI, Germanwatch e.V.]</li> </ul>	<p>ACER finds the NECPs a basis for constructing scenarios that accounts for national differences. ACER requires in the Guidelines that the assumptions derived from NECP inputs are brought in line with the latest policies to ensure the compliance of the resulting scenario.</p> <p>The SRG scrutiny includes the work needed to bring the NECP-derived assumptions in line with the policies if the NECP would not already do that.</p> <p>Benchmarking the scenarios against the Commission scenarios and the latest policy targets is useful and can be included. Nonetheless, this benchmarking should understand the inherent difference between a top-down scenario (e.g. Commission scenarios) and the bottom-up scenarios promoted in the Guidelines.</p> <p>ACER understands the challenge of including the updated NECPs, which are due by 30 June 2023. Nevertheless, these anticipated updates call for a streamlined scenario preparation process for the 2024 TYNDP scenarios to include the updated NECPs to the extent possible. (20)</p> <p>Where NECPs are not aligned to the EU energy and climate policies, the ENTSOs shall bring any assumptions derived from NECP inputs in line with the latest policies. This is already explicitly foreseen in (31)</p>
<b>DRIVERS AND STORYLINES</b>	
<p><b><u>Description of the theme/issue:</u></b></p> <p>Respondents shared their views on the driver description in the Scenarios Guidelines.</p> <p><b><u>Stakeholders' disagreement:</u></b></p> <ul style="list-style-type: none"> <li>Storylines should not be proposed in ACER's guidelines but should be left to the scenario development and</li> </ul>	<p>ACER does not limit the number of storylines/scenarios to be developed. The development of a 'national trends+' scenario and high/low economy variants (as stress tests) are required by the Guidelines for meeting the needs of decision makers, including regulatory authorities.</p> <p>The Scenarios Guidelines welcome ENTSOs creating additional storylines/scenarios. When/if these additional storylines/scenarios are added</p>



Respondents' comments	ACER views
<p>consultation process [EASE, GNI, Terna, Deutsche Umwelthilfe e.V, Ember, RGI, German Watch, ClientEarth, Copenhagen School of Energy Infrastructure, RAP, ENTSOs]</p> <ul style="list-style-type: none"> <li>• If Economic growth is selected, ACER should provide clear definition. [Ember, RGI, RAP]</li> <li>• ACER should include different scenarios. [GIE, Eurelectric, Orsted, Eurogas]</li> <li>• “Scenarios should not be based on technological bets but on mature technologies.” [EDF]</li> </ul> <p><b><u>Stakeholders' considerations/suggestions:</u></b></p> <ul style="list-style-type: none"> <li>• For (37), needs to be definition as to what the “strong reasons” are for changing the set of scenarios. [currENT]</li> <li>• When new storylines are developed, should not take place during a scenario development cycle to not add more workload. [GNI]</li> <li>• ACER should involve the SAB and independent stakeholders in the storyline process. [Deutsche Umwelthilfe e.V]</li> <li>• ACER should clarify that the stable storylines are those set out in qualitative terms to define the key drivers of each scenario. [Ember]</li> </ul>	<p>to the set, they should be sufficiently contrasting. The choice of these additional scenarios (and corresponding qualitative storylines) shall be made after appropriate consultation (38)</p>
<h2>ASSUMPTIONS TO BE INCLUDED</h2>	
<p><b><u>Description of the theme/issue:</u></b> The inclusion of additional assumptions was proposed by the stakeholders</p> <p><b><u>Stakeholders' considerations/suggestions:</u></b></p> <ul style="list-style-type: none"> <li>• Energy storage should be listed as a topic that the ENTSOs must detail how specific assumptions are included in the scenarios. [EASE]</li> <li>• ACER should include smart sector integration rather than just sector integration. [T&amp;D]</li> <li>• All scenarios should include stress tests to identify none or partial fulfilment of the assumptions. [GD4S]</li> </ul>	<p>ACER finds these concrete suggestions helpful and considered their inclusion in the Guidelines. The Guidelines require the ENTSOs to explicitly detail key assumptions. In response to comments about the need for uncertainty information, ACER included in the Guidelines that the ENTSOs shall include risk assessment information in the scenario report.</p>

Respondents' comments	ACER views
<ul style="list-style-type: none"> <li>• Assumptions regarding material constrains should be assessed carefully. [GD4S]</li> <li>• ACER should include the level of future fossil energy demand being planned explicitly. [Deutsche Umwelthilfe e.V]</li> <li>• ACER should define feasible and broadly supported assumptions. [currENT]</li> <li>• The full cost of each abatement technology should be included. [Enel]</li> <li>• SG shall provide with a first estimation on which implications each scenario has for the future development of electricity and gas network in Europe. [Enel]</li> <li>• Assumptions should include “technology evolution, raw materials availability and prices and investment costs and enable the elaboration of robust cost-benefit analysis”. [Eurelectric]</li> <li>• Include: “Hybrid offshore wind projects” in recital (31). [Federal Ministry for Economic Affairs and Climate Action - Germany]</li> </ul>	
<b>TIME HORIZONS</b>	
<p><b><u>Description of the theme/issue:</u></b> Respondents shared their views on acknowledging uncertainty on long-term scenarios and further considerations regarding time horizons.</p> <p><b><u>Stakeholders' considerations/suggestions:</u></b></p> <ul style="list-style-type: none"> <li>• Recognise the great uncertainty on long-term scenarios. [Terna]</li> <li>• Long-term perspective until 2050 should be included [Deutsche Umwelthilfe e.V, currENT, EDF, Eurolectric, Federal Ministry for Economic Affairs and Climate Action - Germany, Copenhagen school of Energy Infrastructure]</li> <li>• Sensitivities around long-term scenario horizons should be included as well. [GNI]</li> <li>• Time horizons should be reduced to a short (0-9 year), medium (10-15 year) and Long Term (2050) scenario, to allow easy comparison for certain EU policy</li> </ul>	<p>ACER underlines that scenario modelling should include 2050 for the simple reason of benchmarking the trajectories and compliance with the 2050 climate neutrality objective.</p> <p>The reduction of modelled years would reduce the ability to compare as the set of years would vary each cycle. ACER believes the approach based on rounded years (e.g. 2030, 2035, 2040 and 2050) provides better comparability between different scenario development cycles.</p>

Respondents' comments	ACER views
reference years such as 2030 and 2050. [GNI]	
<b>OTHER POINTS OF NOTE</b>	
<p><b><u>Stakeholders' considerations/suggestions:</u></b></p> <ul style="list-style-type: none"> <li>• Clarifications on the projections of the 2030 natural gas (NG) consumption is requested. [Eurogas]</li> <li>• Supports quick review process but raising concerns on maintaining the robustness. [GNI]</li> <li>• Address the importance of cost-benefit basis, not only in the concrete investment analysis following the TYNDP itself, but also in the elaboration of the scenarios. [Eurelectric]</li> <li>• ACER should provide definitions on what is meant „robust“ and „objective-driven“ [ German Watch]</li> <li>• The purpose of the scenario exercise needs to be more clearly defined. [E3G]</li> <li>• ACER should define better what stability and agility means regarding scenario robustness. [RAP]</li> <li>• Specificities or metrics should be included to ensure scenarios are balanced and informative for decision makers, stakeholders and public. [RAP]</li> <li>• Any process related to the CBA should be out of the scope of the guidelines. – remove par (41). [ENTSOs]</li> </ul>	<p>ACER took note of other comments raised in this section of the public consultation and finds they are already addressed in the Guidelines, for instance, in the requirement to document the assumptions and data about the supply side or in the section on the quick-review process.</p> <p>Objective-driven means that the TYNDP scenarios are not scenarios intended to assess policies, but offer assumptions that facilitate the assessment of planned network development that enables the Union's adopted policies to be achieved (Added to (23)). That is the purpose of the scenarios: to assess project within the TYNDPs and select PCIs.</p> <p>ACER notes that balanced scenarios mean they cover a sufficiently wide-spectrum of an uncertainty, equally in both directions along the assessed driver; in other words, contrasting scenarios – e.g. centralised generation vs distributed generation – provide a balanced view that is informative.</p> <p>ACER does not include any requirements related to the CBA in the Guidelines</p>

### 3.3 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))

23 respondents provided comments on this question: [ClientEarth, Copenhagen School of Energy Infrastructure, Deutsche Umwelthilfe e.V., EDF, Edison, Ember, Orsted, RAP, RGI, ENAGAS, CAN Europe, currENT Europe, T&D Europe, RSE SpA, ENTSO-E, ENTSOG]

Respondents' comments	ACER views
<b>CREATION AND COMPOSITION OF SRG</b>	
21 respondents: [ClientEarth, Copenhagen School of Energy Infrastructure, Deutsche Umwelthilfe e.V., EDF, Edison, Ember, Orsted, RAP, RGI, ENAGAS, CAN Europe, currENT Europe, T&D Europe, RSE SpA]	

Respondents' comments	ACER views
<p><b><u>Description of the theme/issue:</u></b> Respondents' views and considerations regarding the creation and compositions of SRG.</p> <p><b><u>Stakeholders' support:</u></b></p> <ul style="list-style-type: none"> <li>• General support and acknowledgment of creation of SRG [ClientEarth, Copenhagen School of Energy Infrastructure, Deutsche Umwelthilfe e.V., EDF, Edison, Ember, ENTSO-E, ENTSOG, Eurelectric, Eurogas, GD4S, Germanwatch e.V., GNI, Orsted, RAP, RGI, ENAGAS],</li> <li>• SRG is a promising step in reducing bias in the scenarios. [Copenhagen School of Energy Infrastructure],</li> <li>• SRG contributes to building permanent stakeholder oversight into the TYNDP process. [Deutsche Umwelthilfe e.V.]</li> <li>• SRG can help to form a coherent and agreed view across groups that have conflicting views. [GNI]</li> </ul> <p><b><u>Stakeholders' considerations/suggestions:</u></b></p> <ul style="list-style-type: none"> <li>• Concerns about the power of ENTSOs of creating and then facilitating SRG – eroding independence, overinclusion of technical experts, exclusion of social and policy experts. [ClientEarth, Deutsche Umwelthilfe e.V]</li> <li>• Independent conveyor (44) could ensure a strengthening of the institutional and formal distance from ENTSOs. [CAN Europe]</li> <li>• Better if ACER, the SAB or another public institutions plays role of creating and then facilitating the SRG. [ClientEarth]</li> <li>• Consideration of general stakeholder importance for a successful scenario process. [Eurogas]</li> <li>• No clear <b>date of creation</b> (best as early as possible in Q1/2023) [Orsted], or early 2023 [Eurelectric]</li> </ul> <p><b><u>Stakeholders' considerations/suggestions on the composition of SRG:</u></b></p> <ul style="list-style-type: none"> <li>• Balanced to avoid biased assumptions and data inputs [Deutsche Umwelthilfe]</li> </ul>	<p>ACER underlines that the SRG at least must include the stakeholders referenced in the TEN-E Regulation; furthermore, the SRG must be an open platform so different stakeholders can apply to participate (before the start of the scenario cycle); participation of independent experts is to be encouraged. ENTSOs decide how to organise the call for participation.</p> <p>ACER also underlines that the ENTSOs are responsible for constructing the joint scenarios and for organising the effective stakeholder engagement in compliance with the Regulation. The SRG would rely on the ENTSOs with respect to the detailed process time plan and the stakeholder engagement plan which should specify what input would be expected by when.</p> <p>ACER notes that the lack of the date of creation of the SRG may bring ambiguity especially regarding its involvement in the 2024 TYNDP process. The Guidelines are thus amended by providing the ENTSOs 3 months after the Guidelines enter into force to create the SRG. Despite this, ACER understands that the SRG would need time to become fully active and its contribution to the TYNDP 2024 scenarios may be limited.</p> <p>On the balanced SRG composition and lack of clarity on the key stakeholders, we amended the Guidelines with specific guidance regarding the participation to the SRG.</p> <p>Key Stakeholders pertain to those stakeholder groups defined in Article 12(3). A clear reference is given in the Guidelines.</p> <p>Besides technical organisations, societal and policy organisations are already included in the “key stakeholders”, as defined in Article 12(3).</p> <p>We included a provision where SRG members can propose adding new members to SRG or to</p>

Respondents' comments	ACER views
<p>e.V, GNI, Copenhagen School of Energy Infrastructure]</p> <ul style="list-style-type: none"> <li>• SG could set how many people from each stakeholder group should be represented in SRG [RAP],</li> <li>• Regularly review to ensure the balance over time [GNI]</li> <li>• Not clear, who will be the key stakeholders [Eurelectric]</li> <li>• Desirable to know in advance, which individuals and/or organizations could be part of the SRG. [ENAGAS]</li> <li>• Not only technical organizations/ from the industry (also social and policy) [ClientEarth, Deutsche Umwelthilfe e.V, CAN Europe],</li> <li>• Technology providers [currENT Europe, T&amp;D Europe]</li> <li>• Organizations for energy storage [EASE]</li> <li>• Inclusion of ACER, commission, JRC and SAB would give valuable insights to SRG (though TEN-E does not mandate their inclusion) [ClientEarth, Deutsche Umwelthilfe e.V],</li> <li>• Major national association representing electricity and natural gas operator. [Edison]</li> <li>• Experts with experience of the energy system at local and regional level. [GD4S]</li> <li>• EC and modellers from PRIMES should be involved in the SRG. [Enel]</li> <li>• Ensuring fair representation of civil society community and stakeholders with increasing significance of decarbonisation of the energy system [Germanwatch e.V., RGI]</li> <li>• Member States should also be allowed to become observers to the SRG. [Federal Ministry for Economic Affairs and Climate Action - Germany]</li> <li>• Extend the eligible basis beyond what is minimum required in the revised TEN-E Regulation, and include in addition, citizens' and cities' initiatives [Germanwatch e.V.], citizens' and cities' initiatives, small and large consumers</li> </ul>	<p>discontinue individual memberships in case of conflict of interest (e.g. double representation).</p>

Respondents' comments	ACER views
<p>as well as actors involved in the 24/7 CFE [RGI].</p> <ul style="list-style-type: none"> <li>• Include national scenario experts, whose contribution may regard in particular the update scenarios to ensure and facilitate consistency with official NECPs [RSE SpA]</li> <li>• Different representatives from society: security of supply, affordability, nature protection, participation (economic and procedural), distributional justice. [CAN Europe]</li> <li>• Selection and access to SRG and institutional support should be transparently detailed [CAN], and the list of representatives should be public [ENAGAS].</li> <li>• Stressing a broad stakeholder participation from different fields (in all geography of the EU). [ENTSO-E, ENTSOG, GD4S, T&amp;D Europe]</li> </ul>	
<b>ROLE OF SRG</b>	
<p>10 respondents: [CAN Europe, Enel SpA, Respondent1, Terna S.p.A, Germanwatch e.V., Eurelectric, EDF, Eurogas, RAP, Ember]</p>	
<p><b><u>Description of the theme/issue:</u></b> Respondents shared their views on the role of SRG in the scenario development process</p> <p><b><u>Stakeholder' support:</u></b></p> <ul style="list-style-type: none"> <li>• SRG is an important step into providing safeguards against biased assumptions and data inputs. [CAN]</li> <li>• Improvements in transparency and clarity. [Enel SpA]</li> </ul> <p><b><u>Stakeholder' disagreement:</u></b></p> <ul style="list-style-type: none"> <li>• Failing to see the added value of SRG (stakeholder already had sufficient opportunities to take part in TYNDP processes)-however, would like to see exact list of member of the SRG, extra tasks and work to be done by ENTSOs and their member TSOs as result of establishment of SRG. [Respondent1]</li> <li>• Recital 34 – stakeholders already provide content-related input at national</li> </ul>	<p>ACER believes the SRG can deliver scrutiny of assumptions as well as provide input on process and methodological questions related to the scenarios.</p> <p>One of the main goals of the SRG is to allow a multilateral engagement of stakeholders, in comparison to the current bilateral one, where</p>

Respondents' comments	ACER views
<p>level → the SRG could focus on advising process-related &amp; methodology-related improvements. [Terna S.p.A.]</p> <p><b><u>Stakeholder' considerations/suggestions:</u></b></p> <ul style="list-style-type: none"> <li>• The SAB should take over a guiding role to ensure consistency with EU climate and energy targets. [CAN]</li> <li>• SRG should not replace the two current public consultations and bilateral meetings between stakeholders and ENTSOs [EDF], but complement them [Germanwatch e.V., RGI], the recital “at least one public consultation” should not be a way backward for ENTSOs to reduce the number of public consultations [Eurelectric]</li> <li>• Suggested amendment<sup>2</sup>; further suggestion to maintain the two consultations and rewrite recital 47 as following<sup>3</sup> [EDF]</li> <li>• Validation of inputs and assumptions must be done on an equal basis. [Eurogas]</li> <li>• Perception is that many considerations and recommendations provided by stakeholders during different consultations during the TYNDP scenarios consultation process remain often largely unaddressed. [Enel SpA]</li> <li>• There may be greater value in setting certain parameters of SRG to ensure useful means to incorporate stakeholder input (additional detail regarding what information is shared in advance of SRG meetings, how long before the meetings that information should be shared, whether models should be open for</li> </ul>	<p>stakeholders communicate with the ENTSOs, but not necessarily amongst each other.</p> <p>Although ACER cannot impose the involvement of SAB in the scenario development process, the latter is invited to observe the SRG and provide their inputs, alongside their optional opinion on the scenarios' compliance with the 2030 and 2050 policy targets, as stipulated by Article 12(4).</p>

<sup>2</sup> “An open and streamlined stakeholder engagement plan shall, besides the regular engagement with the SRG, include at least two broad public consultations on the scenarios storylines and the draft scenarios” [Eurelectric]

<sup>3</sup> Recital 47: “An open and streamlined stakeholder engagement plan shall, besides the regular engagement with the SRG, include at least two broad public consultations on the scenarios storylines and the draft scenarios”. [EDF]

Respondents' comments	ACER views
<p>SRG members, how alternative scenarios or sensitivities will be incorporated). [RAP]</p> <ul style="list-style-type: none"> <li>It may also be useful to direct the SRG to provide recommendations about any changes that need to be made to the guidelines themselves to determine if there are missing elements as the process unfolds. [RAP]</li> <li>It is proposed that the SRG conducts and publishes an analysis of the final TYNDP scenarios, in which this independent committee has the freedom to comment directly on and provide independent scrutiny of the outcomes of the scenarios. [Ember]</li> </ul>	<p>ACER finds the suggestion reasonable and the SRG is expected to put forward recommendations on how to improve the process and the stakeholder collaboration with ENTSOs. These recommendations may be included in updated Guidelines.</p>
<h3>SETUP OF THE SRG</h3>	
<p>7 respondents: [Ember, RAP, Eurogas, CAN Europe, ClientEarth, Deutsche Umwelthilfe e.V, Federal Ministry for Economic Affairs and Climate Action - Germany]</p>	
<p><b><u>Description of the theme/issue:</u></b> Respondents shared their views on the setup of the SRG described in the SG document</p> <p><b><u>Stakeholders' support:</u></b></p> <ul style="list-style-type: none"> <li>Welcoming the involvement of energy and climate scientists and independent experts as observers [Eurogas]</li> </ul> <p><b><u>Stakeholders' considerations/suggestions:</u></b></p> <ul style="list-style-type: none"> <li>To add weight to the analysis published by the SRG, the published analysis could be co-signed by the observers of the SRG. [Ember, CAN Europe]</li> <li>Group convener (44) should act as facilitator of the SRG [Ember]</li> <li>Ensure that the group is as independent as possible [RAP]</li> <li>Tasks and mandate of SAB not very well defined [CAN, ClientEarth, Deutsche Umwelthilfe e.V]</li> <li>Need for a 'terms of reference (ToR)' to be prepared together by ACER, ENTSOs and the key stakeholders</li> </ul>	<p>SAB is an independent EU body and ACER has no mandate to impose tasks on it</p> <p>ACER understands the suggestion that observers would co-sign the SRG reports, but reminds that these EU institutions have different roles in the TEN-E processes and should remain independent from the ENTSOs' process to deliver the scenarios.</p> <p>Member States are to be invited as observers to the SRG.</p>



Respondents' comments	ACER views
ahead of the creation of a SRG. [Eurelectric]	
<b>CREATION OF PROCESS TIMELINE AND STAKEHOLDER ENGAGEMENT PLAN</b>	
10 respondents: [ClientEarth, ENTSO-E, ENTSOG, Eurogas, RAP, Eurelectric, CAN Europe, Deutsche Umwelthilfe e.V., Germanwatch e.V., RGI]	
<p><b><u>Description of the theme/issue:</u></b></p> <p>Respondents shared their views on the clear description of the process timeline and stakeholder engagement plan in the SG document.</p> <p><b><u>Stakeholders' support:</u></b></p> <ul style="list-style-type: none"> <li>• Appreciation of creation of the process timeline and stakeholder engagement plan (its importance for ensuring a transparent, inclusive and a streamlined process) [ClientEarth, ENTSO-E, ENTSOG, Eurogas]</li> <li>• Useful to ensure that all stakeholders can plan time and resources for the process. [RAP]</li> <li>• Stakeholder engagement plan is a key element for a transparent, inclusive and streamlined development process [Edison]</li> <li>• Support of requirement to develop and publish a timeline and stakeholder engagement plan at the start of each scenario process [GNI]</li> </ul> <p><b><u>Stakeholders' disagreement:</u></b></p> <ul style="list-style-type: none"> <li>• Should be developed by the SRG in collaboration with the ENTSOs [ClientEarth]</li> <li>• Recital 45 regarding stakeholder engagement plan is confusing →When reading 45 with 46, “stakeholder engagement plan” looks like the plan for ENTSOs and SRG to work together. A distinction should be made about the stakeholder engagement plan for the broader public and the stakeholder engagement plan for the SRG (it is imperative that ENTSOs should publish separate comprehensive stakeholder engagement plans for the public and the SRG at the beginning of the TYNDP</li> </ul>	<p>We added to the Guidelines a call to ENTSOs, as owners of the scenario development process, to consider inviting the SRG to co-create the timeline and the engagement of stakeholders.</p> <p>As with all stakeholder inputs, the ENTSOs shall take those inputs into consideration and explain how inputs have been taken on board, or not as required through recital (49).</p> <p>We clarified the expected minimum content of the plans and encourage the ENTSOs to include the SRG in their development.</p>

Respondents' comments	ACER views
<p>cycle) → suggestion for amendment<sup>4</sup> [Eurelectric]</p> <ul style="list-style-type: none"> <li>• Proposal that stakeholders joining SRG receive detailed plan which input is expected (45) is problematic for the guiding function of the group. [CAN Europe]</li> <li>• Lack of a feedback mechanism constitutes a procedural gap in the TYNDP process → policy targets define the outcome of the scenarios, but scenario analysis does not feed back into policy. [CAN Europe]</li> </ul> <p><b><u>Stakeholders' considerations/suggestions:</u></b></p> <ul style="list-style-type: none"> <li>• <b>Early publication</b> can be limiting as it allows no room for the SRG or stakeholders consultations to correct problems [Deutsche Umwelthilfe e.V.]</li> <li>• Both the process timelines and engagement plans should be amended on the recommendation of the SRG, yet within the responsibility of the ENTSOs. [ENTSO-E, ENTSO-G]</li> <li>• An open channel for questions and clarifications would be beneficial. [Germanwatch e.V., RGI]</li> <li>• Adequate time for feedback on key aspects of the scenario-building process [Germanwatch e.V.]</li> <li>• SRG should provide the advice on time according to the timeline. [ENTSOs]</li> <li>• Too much emphasis on streamlining the process (vs. a process that can efficiently engage and incorporate stakeholders) may undermine the goal of including stakeholders) → less considering ways to streamline, but greater focus on how to best solicit and include stakeholder input [RAP]</li> <li>• SG should also clarify the modalities for considering the remarks coming from</li> </ul>	

<sup>4</sup> Recital 45: “An open process means that the ENTSOs shall publish at the start of the scenarios-building cycle a comprehensive process timeline and comprehensive stakeholder engagement plans for broader public and the SRG that identifies the key moments for stakeholders to provide input. That plan shall.....”

Respondents' comments	ACER views
<p>the SRG [EDF] → suggestion for recital (48)<sup>5</sup></p> <ul style="list-style-type: none"> <li>• Stressing need for a meaningful and robust stakeholder engagement process [Germanwatch e.V.]</li> <li>• Clear deadlines should be made for the development and implementation of the envisaged engagement plan [Germanwatch e.V., RGI]</li> <li>• It should aim at activating and enabling valuable, but currently inactive actors involved in the decarbonization of the energy system [Germanwatch e.V., RGI]</li> <li>• ENTSOs and ACER should record and publish all stakeholder interactions, alongside the input provided and not only the ENTSOs as currently foreseen in recital (48). [RGI]</li> </ul>	
<b>OTHER POINTS OF NOTE</b>	
<p>6 respondents: [Copenhagen School of Energy Infrastructure, Enel SpA, Eurelectric, Germanwatch e.V., RGI, ClientEarth]</p>	
<p><b><u>Stakeholders' considerations/suggestions:</u></b></p> <ul style="list-style-type: none"> <li>• Stakeholders should have access to a budget to cover engagement. [Copenhagen School of Energy Infrastructure]</li> <li>• Inputs that originate from potentially biased stakeholders should be published ahead. [Copenhagen School of Energy Infrastructure]</li> <li>• Acknowledging the different capabilities of stakeholders implies that opportunities for capacity building should be provided, particularly for interested stakeholders. [Germanwatch e.V., RGI]</li> <li>• Scenarios remain quite unvaried and static in terms of assumptions, results and overall path building compared to previous exercises. Some aggregated answers were typically provided in the draft scenarios report but a more</li> </ul>	<p>We believe the SRG offers stakeholders an opportunity to better engage on the topic of the TYNDP scenarios and give space to the SRG to self-organise in the most appropriate and efficient way</p>

<sup>5</sup> “The ENTSOs shall record all stakeholder interactions in terms of the parties, the topic discussed and how the interaction has been considered in the development of the scenarios and shall have to justify when SRG remarks are not taken into account; a clear overview of these interactions shall be made available to the public”. [EDF]

Respondents' comments	ACER views
<p>dedicated “one by one” approach would benefit transparency of the process. We suggest that the Section 4 of the draft should address this issue with a more systematic approach and better clarity on how to resolve and address stakeholders’ comments. [Enel SpA]</p> <ul style="list-style-type: none"> <li>Guidelines should also provide a minimum baseline of specific events and consultations to be held for the scenario development, and timelines for the same. [ClientEarth]</li> </ul>	

### 3.4 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))

16 respondents provided comments on this question: [EDF, RAP, ENTSO-E, ENTSOG, TERNA, T&D Europe, RSE SpA, CAN Europe, ClientEarth, EASE, RGI, Deutsche Umwelthilfe e.V, Edison, Eurelectric, Copenhagen School of Energy Infrastructure]

Respondents' comments	ACER views
<b>PRESENTATION OF ASSUMPTIONS AND INFORMATION</b>	
<p>16 respondents: [EDF, RAP, ENTSO-E, ENTSOG, TERNA, T&amp;D Europe, RSE SpA, CAN Europe, ClientEarth, EASE, RGI, Deutsche Umwelthilfe e.V, Edison, Eurelectric, Copenhagen School of Energy Infrastructure]</p>	
<p><b><u>Description of the theme/issue:</u></b> Respondents shared their views on the description of how the information and data assumptions should be presented</p> <p><b><u>Stakeholders’ support:</u></b></p> <ul style="list-style-type: none"> <li>Acknowledgement of transparent [EDF], non-discriminatory and robust scenarios, especially the inclusion of some detail about what information must be shared [RAP].</li> <li>Positive feedback towards the development processes (inclusive and streamlined [ENTSO-E, ENTSOG], open and clear process to involve stakeholders in the scenarios’ development [Terna] and a transparent and inclusive process to develop assumptions, models and scenarios for the NDPs [T&amp;D Europe]</li> <li>Acknowledgement of adopting academic standards for the presentation</li> </ul>	<p>ACER underlines that the ENTSOs already made important steps forward in terms of documenting the process and publishing data. Nevertheless, stakeholders ask further improvements to be done to increase transparency.</p> <p>ACER clarifies that the distinction between information oriented to informed stakeholders and the wider public was made to describe the type of information and not the access; all information, provided it respects applicable legislation on confidential data, would be accessible by all stakeholders.</p> <p>While ACER finds the concept of open modelling interesting, the Guidelines cannot prescribe the tools the ENTSOs would use, which may be proprietary. The ENTSOs shall in any case publish documentation on the models that shall allow replication of modelling results</p>

Respondents' comments	ACER views
<p>of inputs [EDF, Ember] and the consistent reporting [Ember]</p> <ul style="list-style-type: none"> <li>Note that all data relevant for model build-up has been made available on TYNDP webpage [ENTSO-E, ENTSOG]</li> <li>Every effort aimed to increase ability to replicate/reproduce the analyses should be pursued [RSE SpA]</li> <li>Welcoming the Guideline's continued emphasis on the publication of all assumptions and proper documentation of inputs, assumptions, models and scenarios. [Ember]</li> <li>Format of publication and quality of released data have increased [EDF]</li> </ul> <p><b><u>Stakeholders' considerations/suggestions:</u></b></p> <ul style="list-style-type: none"> <li>Openness of data [CAN Europe, Client Earth, RAP, EASE, RGI, Deutsche Umwelthilfe e.V, RSE SpA, Edison, EDF] – need for an open data license and open source modelling software [CAN Europe, Client Earth, RAP, EASE, Deutsche Umwelthilfe e.V.]</li> <li>Use open models, provide assumptions and information about the modeling to be accessed by all interested parties [RAP], openness would increase transparency, encourage sharing of innovative modelling approaches, strengthen quality and credibility by harvesting the expertise of the scientific community [CAN Europe],</li> <li>Access of data in recital (51) for all available [RGI, Deutsche Umwelthilfe e.V.],</li> <li>Data made available still not enough (in order to reproduce the input data sets). [RSE, EDF]</li> <li>Suggesting the integration into a tool such as ANTARES (data and model standardized in a well-documented and accessible format) [RSE SpA],</li> <li>The documents produced for informed stakeholders should be published and be available for download on ENTSOs websites [Edison],</li> <li>Appreciation of the implementation of a platform to release data [EDF], where PRIMES is used for scenarios, data</li> </ul>	<p>and that explain how modelling tools fit in the process for constructing scenarios.</p> <p>TYNDP 'needs assessment' and 'project assessment' are out of the scope of the Scenarios Guidelines.</p> <p>The Guidelines document has been amended in order to accommodate stakeholder request concerning data sharing to make sure that all relevant data, assumption, tools and models descriptions are transparently shared and with an adequate granularity.</p>

Respondents' comments	ACER views
<p>must be available as much as possible [EASE]</p> <ul style="list-style-type: none"> <li>• Missing information regarding ENTSOs running models – not clear whether or at which steps ENTSOs run models. [RSE]</li> <li>• Regarding the data: important to have the data as granular and disaggregated as possible avoiding room for interpretations or assumptions to ensure that the model can be replicated or reproduced by the stakeholders [Eurelectric]. → proposed amendment<sup>6</sup></li> <li>• Disclosure and justification of sources for data, of the rationale for assumptions, and of the choices of model (-ling approaches) over alternatives. Proposed amendment<sup>7</sup> [Copenhagen School of Energy Infrastructure]</li> <li>• Inclusion of documentation of process and traceability (and referenceability) of different versions of a document within the process and definitions and units with all data provided (done following the FAIR data principles) [Copenhagen School of Energy Infrastructure, RSE]</li> <li>• Format should not change each year, in order to facilitate the data release [EDF]</li> <li>• More transparent information at national level (installed capacity, trades between European countries etc ...) is essential in order to estimate the effort to make by each country) → proposed amendment [EDF]<sup>8</sup></li> </ul>	

<sup>6</sup> “For informed stakeholders, the ENTSOs shall publish all data sets, qualitative assumption and formal hypothesis, as granular and disaggregated as possible, in an appropriate and predefined format, and technical documentation of the models for those wishing to replicate and reproduce the scenario building; the way in which data sets are shared shall remain as much as possible and consistent across cycles to increase robustness” [Eurelectric]

<sup>7</sup> ENTSOs shall adopt academic standards for the presentation of inputs, assumptions, models and final scenarios, in terms of consistency of units and having a list of the sources for the different inputs”. This should be extended to the discussion and justification of assumptions and to the versioning of the documents related to the TYNDP process [Copenhagen School of Energy Infrastructure]

<sup>8</sup> The ENTSOs must make available information adjusted to different stakeholder needs and capabilities: - [...]

Respondents' comments	ACER views
<ul style="list-style-type: none"> <li>Recital (49) should specify that inputs and assumptions should be provided both qualitatively and quantitatively. [Ember]</li> <li>Publication of information/data: Methodologies and assumptions should be published in addition to data, to assure reproducibility [RSE], alignment of scenarios with EU targets, in line with Art.12(1) of the TEN-E, can only be assessed if quantitative data for the entire energy sector is published by the ENTSOs. [Ember]</li> <li>Efficient ways of involvement and a proper level of detail of the information to be shared should be considered in the economy and effectiveness of the overall process. [Terna]</li> </ul>	
<b>INFORMATION ADJUSTED TO DIFFERENT STAKEHOLDER NEEDS AND CAPABILITIES</b>	
<p>8 respondents: [RAP, ClientEarth, Deutsche Umwelthilfe e.V., CAN Europe, Edison, Eurogas, RSE, T&amp;D Europe]</p>	
<p><b><u>Description of the theme/issue:</u></b> Respondents shared their views on the adjustment of data and information publication for informed stakeholders and the wider public.</p> <p><b><u>Stakeholders' support:</u></b></p> <ul style="list-style-type: none"> <li>Agreement on two folded information process [Edison, Eurogas]</li> </ul> <p><b><u>Stakeholders' disagreement:</u></b></p>	<p>ACER clarifies that all information shall be accessible by all and that ENTSOs shall have information that is adjusted to different stakeholders.</p> <p>These publication requirements are not linked to the SRG as the SRG shall have access to the information necessary to carry out its scrutiny.</p>

- Regarding the methodologies (including models), the output data, model-specific properties and documentation;

.iii.1. Information on supply per technology and Member State (bidding zone);

.iii.2. Information on installed capacity per technology and Member State (bidding zone);

.iii.3. Information on demand per sector and Member State (bidding zone);

.iv.4. Trades between European countries

.v.5. Information on the model used for the power and gas systems. The model should be made available in open source.

.vi.6. the reference grid network

Respondents' comments	ACER views
<ul style="list-style-type: none"> <li>No need for two groups, if ENTSOs share data openly and develop simplified summaries [RAP],</li> <li>Two-staged publication with more details for 'informed stakeholders' (51) is questionable. [ClientEarth, Deutsche Umwelthilfe e.V.]</li> <li>Full data access for the entire public should be offered on equal footing. [CAN], disclosing all non-confidential information to public and designating certain information as being more technical would be enough [ClientEarth]</li> <li>The section is confusing in its division of information dissemination [RAP]</li> </ul> <p><b><u>Stakeholders' considerations/suggestions:</u></b></p> <ul style="list-style-type: none"> <li>Format and requirement of the two folded information process should be based on an efficient processing and publication by keeping the time required within limits. [Eurogas]</li> <li>Given the two-folded information process, 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. [RSE]</li> <li>It is not clear whether the group of 'informed stakeholders' is a synonym for the Stakeholder Reference Group [CAN]</li> <li>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. [T&amp;D Europe]</li> <li>If the two-tier system remains, the reference to "informed stakeholders" should be to "SRG" [ClientEarth]</li> </ul>	
<b>REQUIREMENTS ON THE MINIMUM INFORMATION TO BE PUBLISHED</b>	
8 respondents: [Ember, Deutsche Umwelthilfe e.V., ClientEarth, RSE SpA, T&D Europe, Terna, ENTSO-E, ENTSG]	
<b><u>Description of the theme/issue:</u></b>	The request to provide sufficient information about GHG and carbon budget has been included as part of paragraph (25) which asks



Respondents' comments	ACER views
<p>Respondents shared their views on the publication requirements for the scenario-building process.</p> <p><b><u>Stakeholders' support:</u></b></p> <ul style="list-style-type: none"> <li>• Welcoming the itemized list presented in recital (52). [Ember]</li> </ul> <p><b><u>Stakeholders' considerations/suggestions:</u></b></p> <ul style="list-style-type: none"> <li>• Sufficient information about greenhouse gas emissions and carbon budgets to ensure a continued comparability of TYNDP scenarios with regards to climate targets (Art. 12(1) TEN-E) [ClientEarth, Deutsche Umwelthilfe e.V., Ember]</li> <li>• Cost and economic indicators for the scenarios, including at a minimum the calculated system costs, divided into power system and other energy system costs, presented as Net Present Value (NPV). [Ember]</li> <li>• Information on the optimized capacity of cross-border transmission lines per bidding zone. [Ember]</li> <li>• Information on energy demand by sector, this should also be provided by (resulting) fuel type within each sector. This will illustrate how scenario assumptions result in different energy futures. [Ember]</li> <li>• Regards to flow-based analyses: Power Transfer Distribution Factor (PTDF) matrix would be needed [RSE]</li> <li>• 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. [RSE]</li> <li>• More information about operation of gas networks (all these data have not been published in detail in the previous TYNDP editions). [RSE]</li> <li>• Confusion between scenarios and TYNDP results, hence a clearer distinction should be applied. [RSE]</li> </ul>	<p>the ENTSOs to prove how the scenarios are target compliant.</p> <p>All comments which refers more to CBA or network assessment have been disregarded.</p>

Respondents' comments	ACER views
<ul style="list-style-type: none"> <li>• Boundary conditions such as main commodity import (e.g. H2) profiles, quantity and relevant policy assumptions, should be clarified. [RSE</li> <li>• Avoiding explicit terms like “bidding zone level” [Terna, ENTSO-E, ENTSOG] (“delivering results on a bidding zone level”) → the longer the time horizon is considered, the less representative the current configuration of bidding zones might be → suggestion to remove the reference to individual bidding zone from the information listed in paragraph (51) [Terna], bidding zones could render country based analysis difficult without proper understanding of the split; and bidding zones could evolve towards 2040 and 2050, an aspect that could affect the robustness of results over multiple cycles) [ENTSO-E and ENTSOG]</li> <li>• In addition to the information that is already published, other data should be provided to allow replicating and reproducing the scenarios (NTC profiles, flows from exogenous regions) [RSE SpA]</li> </ul>	
<b>OTHER POINTS OF NOTE</b>	
4 respondents : [Respondent1, T&D Europe, ENTSO-E, ENTSOG]	
<p><b><u>Stakeholders' considerations/suggestions:</u></b></p> <ul style="list-style-type: none"> <li>• Important to see how ACER estimates the extra tasks necessary to adhere to the tasks set by the Framework Guidelines. Could the new tasks necessitate new FTEs working at the ENTSOs? [Respondent1]</li> <li>• 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</li> </ul>	<p>The ENTSOs shall focus their resources on the tasks mandated by Union legislation</p> <p>The scenarios are not meant to define infrastructure projects, but to assess those projects</p> <p>The Guidelines include that confidentiality of data should be treated according to the legal requirements.</p>

Respondents' comments	ACER views
<p>providers will need to expand their capacities. The more transparency and certainty they will get, the faster they will manage the required planning activities. [T&amp;D Europe]</p> <ul style="list-style-type: none"> <li>• Re-wording of obligation to publish “all datasets” to “responsibility to publish data taking into account confidentiality constraints”. [ENTSO-E, ENTSG]</li> </ul>	

### 3.5 Feedback on the process for ensuring independent scrutiny of inputs, assumptions and methodologies (Section 5 of the draft Guidelines)

23 respondents provided comments to this question: [EASE, T&D, Eurogas, GNI, Terna S.p.A, Deutsche Umwelthilfe e.V., FGSZ Ltd., Ember, currENT, Edison, EDF, Enel SpA, ENTSO-E, ENTSG, Enagas, Eurlectric, RSE, CAN Europe, ClientEarth, E3G, Copenhagen School of Energy Infrastructure, RAP, Federal Ministry for Economic Affairs and Climate Action - Germany]

Respondents' comments	ACER views
<b>SRG INVOLVEMENT IN INDEPENDENT SCRUTINY</b>	
<p><b><u>Description of the theme/issue:</u></b> Respondents shared their views on the SRG involvement in scrutinising the scenarios assumptions and data.</p> <p><b><u>Stakeholders' support:</u></b></p> <ul style="list-style-type: none"> <li>• Stakeholders welcomed the SRG and its involvement in scrutinising the scenarios assumptions and data. [Eurogas, GNI, Edison, Enagas, RAP, ENTSO-E, ENTSG, E3G, and CAN]</li> </ul> <p><b><u>Stakeholders' considerations/suggestions:</u></b></p> <ul style="list-style-type: none"> <li>• SRG should not depend on majoritarian approach because of the diverse expertise of its members. [ClientEarth]</li> <li>• The importance of the feedback of the stakeholders should be underlined, being an indispensable part of the scenario development process (the creation of the SRG can assist ENTSGs to better scrutinize the feedback, as well as to ensure alignment with Article 12.1 of the recast TEN-E Regulation). [ENTSGs]</li> <li>• The formation of the SRG represents an opportunity to introduce a crucial</li> </ul>	<p>ACER takes note of the support for the SRG involvement in independent scrutiny (renamed “stakeholder scrutiny” in the final Guidelines)</p>

Respondents' comments	ACER views
<p>feedback loop into the TYNDP process between policy formation and technical insights from open, transparent energy scenarios. [Ember]</p>	
<b>POWERS OF SRG</b>	
<p><b><u>Description of the theme/issue:</u></b> Respondents shared their views on the fact that SRG provides non-binding advice</p> <p><b><u>Stakeholders' support:</u></b></p> <ul style="list-style-type: none"> <li>• Supports that SRG provides non-binding advice [GNI]</li> </ul> <p><b><u>Stakeholders' disagreement:</u></b></p> <ul style="list-style-type: none"> <li>• SRG should provide binding advice [CAN, E3G]</li> <li>• SRG has to have the power to veto or amend ENTSOs proposals [Deutsche Umwelthilfe e.V.]</li> </ul> <p><b><u>Stakeholders' considerations/suggestions:</u></b></p> <ul style="list-style-type: none"> <li>• In case, SRG's advice is not considered, ENTSOs should explain why the advice has not be considered. [Eurelectric, Edison, Ember, CAN]</li> <li>• "The SRG should be empowered to act as an independent watchdog of the TYNDP process. [Deutsche Umwelthilfe e.V.]</li> </ul>	<p>ACER underlines that the SRG is a means of stakeholder engagement and to involve stakeholders in scrutinising the scenarios. It is not a new body added to the TYNDP process as only the Regulation could do that. The ENTSOs remain the sole responsible for building joint TYNDP scenarios.</p>
<b>FOCUS OF THE SRG</b>	
<p><b><u>Description of the theme/issue:</u></b> Respondents shared their views on the general focus of the SRG during the scenario development process</p> <p><b><u>Stakeholders' considerations/suggestions:</u></b></p> <ul style="list-style-type: none"> <li>• SRG should be more focused on methodologies and standards to be applied and considered in the scenario development process, rather than on assessing the specific values of the variables that define the scenarios. [Terna]</li> <li>• Make clear it is the SRG who is responsible for providing (not</li> </ul>	<p>The focus of the SRG and its ability to provide constructive comments relies solely on its members. The activity of the SRG should be in line with the individual TYNDP time plan as set forth by the ENTSOs, taking care they provide timely input.</p> <p>The consultations between SRG and the ENTSOs do not limit the latter to engage with other stakeholders.</p>

Respondents' comments	ACER views
<p>“assisting”) independent scrutiny. [Ember]</p> <ul style="list-style-type: none"> <li>• The set of main uncertainties need to be outlined and consulted on SRG and stakeholders [currENT]</li> <li>• SRG should be involved earlier at this process and not at that late stage [RSE, RAP]</li> <li>• The SRG should also be entitled to form an independent scrutiny of the ENTSOs scenario building. [CAN]</li> <li>• SRG should provide the advice on time according to the timeline. [ENTSOs]</li> <li>• SRG should be given option to reject or amend proposed storylines and scenarios+ changes to engagement plan) and addressing the concern of short consultation deadlines [Deutsche Umwelthilfe e.V.]</li> <li>• Independent advice outside the SRG should be sought at all time, regarding majority or not. [ClientEarth, Copenhagen school of Energy Infrastructure]</li> </ul>	

### 3.6 Feedback on the proposed quick-review process to enable updating a scenario in case key assumptions change (Section 6 of the draft Guidelines)

21 respondents provided comments to this question: [T&D Europe, Eurogas, Gas Networks Ireland (GNI), Gas Distributors for Sustainability (GD4S), Terna S.p.A., Deutsche Umwelthilfe e.V.(DUH), Respondent1, Ember, Renewables Grid Initiative (RGI), Edison S.p.A., EDF, Enel SpA, ENTSO-E, Enagas, Eurelectric, Germanwatch e.V., RSE SpA, Climate Action Network (CAN) Europe, ClientEarth, Regulatory Assistance Project, ENTSOG].

Respondents' comments	ACER views
<b>TRIGGERING EVENT</b>	
<p><b><u>Description of the theme/issue:</u></b> Respondents provided their views on the events triggering the request for the quick review process activation, and the predetermination of the characteristics of the event.</p> <p><b><u>Stakeholders' considerations/suggestions:</u></b></p>	<p>The triggering characteristics are impossible to define ex ante, as these events are highly unpredictable, e.g. COVID, war in Ukraine, etc. and it is impossible to foresee the different dimensions of their impact. This is why defining such events too strictly could be counterproductive as it might exclude important future events.</p>

Respondents' comments	ACER views
<ul style="list-style-type: none"> <li>• Only unforeseen events should trigger the process. [Deutsche Umwelthilfe e.V., RGI, Germanwatch]</li> <li>• Lack of foreseeability characteristics should be removed because a foreseeable event that was before unlikely could now be more likely. [(ClientEarth)]</li> <li>• Triggering characteristics should be defined by EC or EU Agencies [ENEL]</li> <li>• Triggering characteristics should be provided ex ante in SG [ENEL, ENTSOs, Enagas]</li> <li>• ENTSOs should be required to include in the joint scenario report, the definition of triggering event, identifying variables and observed changes. [Terna Spa]</li> <li>• Include definition of sufficiently significant event. [RAP]</li> <li>• Define events with impact on main target policies and not on assumptions [RSE] (Sufficiently solved with note 22 of FG)</li> </ul>	<p>ENTSOs are required to transparently include all relevant info on the update of the scenario(s) and the process leading to it.</p>
<h3>TRIGGERING ENTITY/IES</h3>	
<p><b><u>Description of the theme/issue:</u></b> Respondents provided their views on the entities able to request the quick review process activation.</p> <p><b><u>Stakeholders' considerations/suggestions:</u></b></p> <ul style="list-style-type: none"> <li>• All members of the SRG, ACER and the ENTSOs should be able to request the quick-review process. The activation decision can then be made by a smaller group including the Commission, ACER and ENTSOs [T&amp;D Europe]</li> <li>• SRG should be able to trigger the quick process [Edison]</li> <li>• SRG and SAB should also trigger quick process [CAN Europe, ClientEarth]</li> <li>• Stakeholder should be able to send request of activation to EC, ACER or ENTSOs to trigger activation. [Eurelectric]</li> <li>• Only EC should hold activation power [Deutsche Umwelthilfe e.V., RGI, Germanwatch]</li> </ul>	<p>The decision on requesting/triggering the quick review (renamed "quick-update process" to more accurately reflect its purpose) should be in the hands of entities who directly use these scenarios for decision making, e.g. European Commission (for PCIs) or NRAs for individual project (via ACER).</p> <p>The SRG and SAB are now included with the option to propose a quick revision, but the decision to do so shall rely on the aforementioned entities.</p>

Respondents' comments	ACER views
<ul style="list-style-type: none"> <li>• EC, ACER or ENTSOs should “request” the activation of quick review and activation decided based on ex-ante provisions in SG [ENTSOs, Enagas]</li> <li>• An independent entity to review the activation could be useful, such as ACER or the SRG [RAP]</li> </ul>	
<b>QUICK-REVIEW TIMELINE</b>	
<p><b><u>Description of the theme/issue:</u></b> Respondents provided comments regarding the timing of the quick-review process.</p> <p><b><u>Stakeholders' disagreement:</u></b></p> <ul style="list-style-type: none"> <li>• ACER should provide more time to consider regional and local specificities and allow TSOs involvement. [Terna Spa]</li> <li>• Too strict timing [Respondent1]</li> <li>• 4 weeks instead of 3 [Edison]</li> <li>• More time needed, decided by ENTSOs under the provision of paragraph 60 and allow TSO involvement. [ENTSOs]</li> <li>• One month for SRGs to produce new scenarios. [RSE]</li> </ul> <p><b><u>Stakeholders' considerations/suggestions:</u></b></p> <ul style="list-style-type: none"> <li>• Specifics on the process progressing should be determined on a case by case basis, depending on ENTSOs ability and urgency. [GNI]</li> </ul>	<p>The timing was intentionally strict to facilitate a fast implementation of required changes. However, if ENTSOs find acceptable, the SRG can be allowed more time to provide inputs.</p> <p>In addition, the time allowed for ENTSOs to revise is now also possible to be extended if the TYNDP process allows to do so.</p>
<b>AMENDMENTS REVISION</b>	
<p><b><u>Description of the theme/issue:</u></b> Respondents provided their views on the amendments process revision, in particular related to SRG recommendations and Public consultation needs.</p> <p><b><u>Stakeholders' considerations/suggestions:</u></b></p> <ul style="list-style-type: none"> <li>• SRG's recommendations and public consultation should always be embedded in the quick review process. [Deutsche Umwelthilfe e.V., RGI, Germanwatch]</li> <li>• Run public consultation [Edison]</li> </ul>	<p>Due to the obvious need to keep such a quick-review process streamlined, certain elements of scenario development needed to be severely reduced.</p> <p>A public consultation can be included during the SRG revision, but the length shall allow the SRG to consider how to take the public consultation input into account, especially if it counters the SRG input.</p>

Respondents' comments	ACER views
<ul style="list-style-type: none"> <li>• If public consultation cannot take place scenarios and results should at least be shared with stakeholders. [Enagas]</li> <li>• ENTSOs shall publish the reasoning for the activation of the quick review process, the SRGs recommendations and the amendments to the assumptions. [Eurelectric]</li> <li>• ENTSOs shall provide justification for adopting or rejecting the non-binding recommendations. [Eurelectric]</li> <li>• If SRG recommendation is not binding then PC should always take place. [CAN Europe]</li> <li>• Make clear updated scenario must be compliant with other provisions of SG. [ClientEarth]</li> <li>• A two-week public consultation should always be held. This may not be necessary if input from the SRG is binding or the Commission, ACER, or SAB can amend or reject an updated scenario. [ClientEarth]</li> <li>• PC could happen in the same period as SRG scrutiny [RAP]</li> </ul>	<p>We agree and have added a request for ENTSOs to publish what was amended and the process leading to the amendment.</p> <p>ENTSOs need to transparently describe the process of amendment and this also includes why certain inputs were or were not taken into account (also respecting the transparency requirements of Section 4 of the Guidelines).</p> <p>The fact that SRG recommendation is not binding is not connected with a need to run a public consultation, which is also not binding. If we were to make any of these binding, it would de facto change the ownership of the scenarios.</p> <p>Updated scenarios cannot be fully compliant with other requirements of the Guidelines, such as the ones on public consultation, number and diversity of scenarios, etc.</p> <p>EC confirms all scenarios, also those which are produced by the quick-review process.</p>
<h2>SCENARIO SELECTION AFTER QUICK-REVIEW PROCESS</h2>	
<p><b><u>Description of the theme/issue:</u></b> Respondents provided their views on ACERs' choice that the quick-review process shall be performed on the central scenario, unless time allows adaption also of its variants.</p> <p><b><u>Stakeholders' disagreement:</u></b></p> <ul style="list-style-type: none"> <li>• Selection of scenario to update out of scope of ACER SG [ENTSOs]</li> </ul> <p><b><u>Stakeholders' considerations/suggestions:</u></b></p> <ul style="list-style-type: none"> <li>• Clarify if the full scenario report is going to change or just the modeling used in the assessment of the TYNDP.[GNI]</li> <li>• Further assess how the updated assumptions will interact and align with</li> </ul>	<p>ENTSOs are to be transparent on changes made to the scenario(s) due to the quick-review process.</p> <p>We added a request that ENTOS need to be transparent on which scenarios were updated and which not. The choice on which scenarios are used for the CBA is that of the overall TYNDP.</p>



Respondents' comments	ACER views
<p>the scenario building process.[ Deutsche Umwelthilfe e.V., RGI,]</p> <ul style="list-style-type: none"> <li>Clarify if the non-updated scenario variants will still be used [Edison]</li> </ul>	
<b>OTHER POINTS OF NOTE</b>	
<p><b>Description of the theme/issue:</b> Overall support on the quick review process</p> <p><b>Stakeholders' support</b></p> <ul style="list-style-type: none"> <li>Quick-review process without further comments [Eurogas, GD4S, Ember, EDF].</li> </ul> <p><b>Stakeholders' considerations/suggestions:</b></p> <ul style="list-style-type: none"> <li>It is not clear who endorses the update. According to the proposal, ENTSOs could suggest that a certain event has a sufficient impact (59), they could then suggest changes, just inform the EU institutions and the SRG to then update scenarios according to their own suggestions (60) (62) as SRG recommendations are again non-binding. If this is the case, a two weeks public consultation should always be run (64) to broaden the independent scrutiny. [CAN]</li> </ul>	<p>An amendment of the Guidelines is proposed so that the activation is limited to EC and ACER, while ENTSOs, SRG and SAB can propose the activation. EC confirms the scenarios as per 12(6);</p>

### 3.7 Feedback on the proposed compliance reporting (Section 7 of the draft Guidelines)

8 respondents provided comments on this question: [Gas Networks Ireland (GNI), Respondent1, Ember, Enel SpA, ENTSO-E, Enagas, ENTSG and Regulatory Assistance Project] [6 additional respondents, replied "no comments" or "NA"]

Respondents' comments	ACER views
<b>INCLUSION OF COMPLIANCE REPORTING IN THE SCENARIO REPORT</b>	
6 respondents: [GNI, Ember, ENTSO-E, ENTSG, Enagas, Respondent1, Enel SpA]	
<p><b>Description of the theme/issue:</b> Respondents shared their comments regarding the inclusion of compliance report in the SG, as a requirement.</p> <p><b>Stakeholders' considerations/suggestions:</b></p>	<p>ACER clarifies that compliance reporting means outlining how the ENTSOs have implemented the Guidelines and the guiding Regulation; this reporting facilitates the checks to be done by ACER, the SAB and the Commission</p>

Respondents' comments	ACER views
<ul style="list-style-type: none"> <li>The assessment of the joint scenarios' compliance with the Guidelines should be published either alongside or integrated with the draft (and final) Scenario report. It is essential that it is published before the scenarios are used for the <b>PCI selection process</b>, in order to increase credibility and trust. Stakeholders must also have the opportunity to provide their feedback on this during the public consultation process. [Ember]</li> <li>Appreciate the understanding on the limitation of implementation of the Scenarios Guidelines for the TYNDP 2024 cycle due to the timing of creation of the final Guidelines. [ENTSOs]</li> <li>As both the SRG and ACER will assess the ENTSOs' scenarios against the criteria set in the Framework Guideline, the compliance reporting to be further done by the ENTSOs is deemed time-consuming and superfluous. [Respondent 1].</li> <li>Suggestion that European Institutions should be actively involved in the process of compliance reporting, including also modellers of the PRIMES scenarios. [Enel]</li> </ul>	<p>ACER renamed the chapter to ENTSOs reporting on implementation of the Guidelines.</p> <p>The SRG is expected to provide their independent view on how the process has worked</p>
<h2>APPROACH FOR TYNDP 2024 SCENARIOS</h2>	
<p><b><u>Description of the theme/issue:</u></b> Respondents shared their views on the implementation of SG on the TYNDP 2024 scenarios.</p> <p><b><u>Stakeholders' considerations/suggestions:</u></b></p> <ul style="list-style-type: none"> <li>The scenario develop process for TYNDP 2024 kicked off in early 2022 and will be well progressed by the time that the final ACER scenarios guidelines are published in January 2023 (compliance assessments for the 2024 cycle should be considered as suggested improvements for the 2026 cycle, rather than a non-approval issue). [GNI]</li> <li>Appreciation of the understanding on the limitation of implementation of the Scenarios Guidelines for the TYNDP 2024 cycle due to the timing of creation of the final Guidelines. [ENTSOs]</li> </ul>	<p>ACER underlines that also the 2024 scenarios must be assessed against the Guidelines because the EC needs to approve the scenarios</p>

## 3.8 Other feedback

14 respondent: [T&D Europe, Gas Networks Ireland (GNI), Deutsche Umwelthilfe e.V., Ember, Renewables Grid Initiative (RGI), Enel SpA, ENTSO-E, ENTSO-G, Enagas, Germanwatch e.V., Climate Action Network (CAN) Europe, ClientEarth, Bellona Europa and Copenhagen School of Energy Infrastructure]

Respondents' comments	ACER views
<b>PUBLIC CONSULTATION REQUIREMENTS</b>	
4 Respondents: [RGI, ENTSO-E, ENTSG and Germanwatch e.V.]	
<p><b>Description of the theme/issue:</b></p> <p>Respondents shared their considerations regarding requirements for additional public consultations.</p> <p><b>Stakeholders' considerations/suggestions:</b></p> <ul style="list-style-type: none"> <li>• ACER should launch afterwards an additional public consultation to enhance clarity, transparency and effectiveness of the Scenarios Guidelines. [RGI]</li> <li>• The development of the storyline report shall be subject to a process that includes consultation with stakeholders and not directly enforced by the Guideline. In addition, both organization would like to have at least one public workshop session before finalizing the Scenarios Guidelines, in order to transparently explain how the received feedbacks will be taking into account. (ENTSOs asked to clarify the process for updating the Scenarios Guidelines). [ENTSOs]</li> <li>• Recital (16) - Include a public consultation requirement for any future update of the Scenarios Guidelines. [Germanwatch e.V.]</li> </ul>	<p>ACER takes note of the suggestion to have additional consultations on top of the targeted and public consultations carried out. Considering the timeline for adopting these Guidelines, ACER could not fit a workshop after the public consultation;</p> <p>ACER will regularly scope the applicability of the Scenarios Guidelines and plans to discuss the need to reopen the Scenarios Guidelines in a dedicated workshop, either late in 2023 or early in 2024. In case the Scenarios Guidelines are updated, public and targeted stakeholder consultations will be run.</p>
<b>FURTHER ASSUMPTIONS FOR THE TYNDP DEVELOPMENT</b>	
3 respondents: [Deutsche Umwelthilfe e.V., ENEL spA, Climate Action Network (CAN) Europe]	
<p><b>Description of the theme/issue:</b></p> <p>Respondents' further considerations on different assumptions for the TYNDP development</p> <p><b>Stakeholders' considerations/suggestions:</b></p>	<p>ACER thanks the respondents for these comments that go beyond the scope of the first edition of these Guidelines.</p>

Respondents' comments	ACER views
<ul style="list-style-type: none"> <li>• TYNDP process must shift from planning new fossil fuel infrastructure to creating the infrastructure for an accelerated energy transition. This also requires assessing the need for decommissioning or repurposing of fossil fuel infrastructure as it is replaced by RES solutions and energy savings. According to the respondent, to ensure compatibility with EU climate targets, the TYNDP process should be conducted by a fully independent body with the ENTSOs being given a purely advisory role. [Deutsche Umwelthilfe e.V]</li> <li>• The Global Ambition scenario of the TYNDP 2022, the clean gas imports widely exceed indigenous production, assuming that other regions of the world will be able to supply large quantities of decarbonized gas to the EU and would imply substituting one old energy dependency on fossil fuels with another new dependency. [ENEL SpA]</li> <li>• TYNDP scenarios should help to prepare the ground for an accelerated energy transition. The scenario building must not prolong path dependencies on fossil fuels but spearhead the EU's way towards the Paris Agreement's objective of limiting average global temperature increase to 1.5°C. [CAN]</li> </ul>	
<b>CONFIDENTIAL DATA</b>	
2 respondents: [ENTSO-E, ENTSOG]	
<p><b><u>Description of the theme/issue:</u></b> Respondents shared their views on confidentiality matters.</p> <p><b><u>Stakeholders' considerations/suggestions:</u></b></p> <ul style="list-style-type: none"> <li>• SG should clearly acknowledge that ENTSOs are bounded by the confidentiality of certain data provided by its members and shall ensure the continuity of this status. [ENTSOs]</li> </ul>	The confidentiality of information shall be treated in line with legal requirements; this aspect is addressed in (4), (50) and (57)
<b>CLIMATE NEUTRALITY AND TARGETS</b>	
3 respondents: [ENEL, ClientEarth, Bellona Europa]	

Respondents' comments	ACER views
<p><b><u>Description of the theme/issue:</u></b></p> <p>Respondents shared their specific considerations regarding climate neutrality assumptions and climate targets.</p> <p><b><u>Stakeholders' considerations/suggestions:</u></b></p> <ul style="list-style-type: none"> <li>• CCS and net-negative emission technologies should be treated with caution when incorporated to long-term decarbonisation scenarios exercises because such strong assumption can lead to underestimate the deployment of other technologies that could be required to reach the carbon neutrality at 2050. [ENEL]</li> <li>• The risk of overshooting the 2030/2050 energy and climate targets - scenarios should be oriented towards achieving climate neutrality by 2040, to ensure achievement of the 2050 climate neutrality target. [ClientEarth]</li> <li>• The 20 Mt of renewable hydrogen by 2030, proposed in the REPowerEU Plan is unrealistic target for the 2030 time horizon, which poses a strong challenge to the electricity sector, as it requires channelling the majority of RES capacity towards the production of renewable hydrogen. [Bellona Europa]</li> </ul>	<p>ACER addresses the compliance with the Union's policies in Section 3 of the Guidelines. Requirements were added on demonstrating how a scenario complies with the policies and informing about what are the main risk factors behind a scenario.</p>
<p><b>OTHER POINTS OF NOTE</b></p>	
<p><b><u>Comment on this PC itself and survey tool:</u></b></p> <ul style="list-style-type: none"> <li>• The technology providers for T&amp;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. [T&amp;D Europe]</li> </ul>	<p>While not relevant to the Scenarios Guidelines, ACER will consider this suggestion when organising public consultations.</p>
<p><b><u>Comment on references:</u></b></p> <p>ClientEarth: The reference documents (page 2) must be updated to include:</p> <ul style="list-style-type: none"> <li>• Regulation (EU) 2021/1119 of 30 June 2021 establishing the framework or achieving climate neutrality; Regulation (EU) 2018/1999 of 11 December 2018 on the Governance of the Energy Union and Climate Action;</li> </ul>	<p>ACER thanks the respondents for their specific comments and updated the references before finalising the Scenarios Guidelines.</p>

Respondents' comments	ACER views
<ul style="list-style-type: none"> <li>• Regulation (EU) 2019/942 of 5 June 2019 establishing a European Union Agency for the Cooperation of Energy Regulators;</li> <li>• Commission Recommendation (EU) 2021/1749 of 28 September 2021 on Energy Efficiency First: from principles to practice – Guidelines and examples for its implementation in decision-making in the energy sector and beyond.</li> </ul> <p>The reference to streamlining in recital 10 should be removed, since this is not required by Art. 12 TEN-E.</p> <p>Any reference to the 2030/2050 energy and climate targets or to EE1st as “policy objectives” (e.g., footnote 10) must be changed to “legal obligations” as they are substantive legal requirements in, i.e., Art. 12(1) TEN-E.</p>	
<p><b><u>Technical comments on constructing scenarios:</u></b></p> <ul style="list-style-type: none"> <li>• SG should include more specific aspects (avoiding the use of historical information for demand profiles) such as, diversifying the climate years, benchmarking models and tools to other available alternatives [Copenhagen School of Energy Infrastructure]</li> <li>• Ensuring coherence with other scenarios, particularly those of the European Commission-PRIMES, is key for a successful definition and implementation of the ACER guidelines. [ENEL]</li> <li>• The forecast of the energy carrier's demand should be carefully revised (including its adequacy with REPower EU demand). [Enagas]</li> </ul>	<p>ACER thanks the respondents for these additional suggestions and added a recital on benchmarking in Section 3.</p> <p>Assumptions derived from bottom-up data must be brought in line with the latest policies, if the underlying data is not already in line, in order to build compliant scenarios.</p>

- Annex I: List of Respondents

No.	Organisation	Country of origin	Activity	Confidential
1.	Bellona Europa	All EU Member States	Civil society organisation	No
2.	ClientEarth	All EU Member States	Civil society organisation	No
3.	Climate Action Network (CAN) Europe	All EU Member States	Civil society organisation	No
4.	Copenhagen School of Energy Infrastructure	Denmark	Other (University / Research Institution)	No
5.	currENT Europe	All EU Member States	Other (Association for companies developing innovative grid technologies)	No
6.	Deutsche Umwelthilfe e.V.	Germany	Civil society organisation	No
7.	E3G	All EU Member States	Civil society organisation	No
8.	EASE - European Association for Storage of Energy	All EU Member States	Other market participant	No
9.	EDF	France	Generator (or association)	No
10.	Edison S.p.A.	Italy	Other market participant	No
11.	Ember	All EU Member States	Other (Think-tank)	No
12.	Enagas	Spain	Transmission System Operator (or association)	No
13.	Enel SpA	Italy	Utility (or association)	No
14.	ENTSO-E	All EU Member States	Transmission System Operator (or association)	No
15.	ENTSOG	Belgium	Transmission System Operator (or association)	No
16.	Eurelectric	Belgium	Utility (or association)	No
17.	Eurogas	Belgium	Other (gas wholesale, retail and distribution association)	No
18.	Gas Distributors for Sustainability (GD4S)	Belgium	Distribution System Operator (or association)	No

No.	Organisation	Country of origin	Activity	Confidential
19.	Gas Infrastructure Europe (GIE)	Belgium	Transmission System Operator (or association)	No
20.	Gas Networks Ireland (GNI)	Ireland	Other (TSO and DSO)	No
21.	Germanwatch e.V.	Germany	Civil society organisation	No
22.	Orsted	Denmark	Generator (or association)	No
23.	Regulatory Assistance Project	Belgium	Civil society organisation	No
24.	Renewables Grid Initiative (RGI)	Germany	Civil society organisation	No
25.	RSE SpA	Italy	Other (Research on Energy System)	No
26.	T&D Europe	Belgium	Other market participant	No
27.	Terna S.p.A.	Italy	Transmission System Operator (or association)	No
28.	Bundesministerium für Wirtschaft und Klimaschutz - Federal Ministry for Economic Affairs and Climate Action	Germany	Member State	No
29.	Undisclosed stakeholder "Respondent1"	/	Transmission System Operator (or association)	Name to be anonymised