

Written feedback

TYNDP Process

16 August 2022

Contribution to ACER's technical workshops

Framework Guidelines on Scenarios for the TYNDP

Topic "Alignment of scenarios with policy objectives"

- A multiple scenario approach is the best way to deal with economic (including economic recession and inflation) and geopolitical uncertainties, as well as with uncertainty about the speed of national reforms leading to a quick and substantial renewable gas development.
 - It will be very hard to target a future state of development of the energy transition, including with regard the development of renewable gases
 - Based on solid knowledge of current markets and technological readiness, multiple scenarios will give space for a serious and substantial role of renewable gases, especially biomethane from anaerobic digestion (as an already mature technology), and biomethane from gasification (as a demonstrated and soon commercially available technology).
- One of the scenarios can be based on energy and climate targets set at EU level. This encompasses:
 - The Union climate objectives for 2030 and 2050
 - the REPowerEU ambition, including the objective of 35 bcm of domestic biomethane production by 2030.
- There should also be one or several scenarios built in a bottom-up approach, using:
 - The current version of NECPs,
 - National targets newer than the NECP, adopted in official strategic documents or in national legislation, including national targets of biogas and biomethane production/consumption,
 - National or (whenever possible) regional assessments of renewable energy production potential (including biomethane) by 2030. Robust assessments show that there is enough feedstock to produce 35 bcm of biomethane in the Europe by 2030. See the latest publication for the Gas for Climate Consortium, [Biomethane production potentials in the EU](#), which includes a breakdown of estimates by Member States.
 - Whenever possible, regional forecasts or goals of energy demand. Regional governments may plan the use of locally produced biomethane for transport and for heating of buildings or for local industries. They may rely on deployment of smart hybrid heating to reduce both the gas demand and the electricity peak demand while being more resilient.

The European Biogas Association and Gas DSOs (via their European associations) should be consulted about the potential of role of biomethane and synthetic methane because of their knowledge of, respectively, the biomethane market and the consumption by final customers.

- Several timeframes should be considered in the scenarios: 2030, 2035, 2040.
- To deal with uncertainties of the future within the TYNDP process, scenarios should also include comments on the potential impact of a substantial change to the main parameters.
- Enhanced transparency:
 - Datasets underpinning the graphs should be published so that stakeholders can have access to the exact figures used.
 - Methodology to calculate electricity and gas demand should be explained in detail.

Topic "Ensuring proper consideration of efficiency and sector integration (including electrification, heating, hydrogen and other energy vectors and technologies)"

- The focus on sector integration in the TYNDP should be reinforced by considering more opportunities for "Power-to-Methane" (synthetic methane production) and "downstream" sector coupling, i.e. the coupling of gas and electricity distribution based on the deployment of smart hybrid heating technologies and the subsequent creation of demand-side response in heating
- When considering energy efficiency, the efficiency of networks and energy conversions should be given proper attention. Since the energy infrastructure has to be designed for the peak demand, the impact of options for heating decarbonisation on the necessary infrastructure, the associated costs and the energy losses should be considered. Use of renewable fuels for low-temperature heat and local sector coupling of gas and electricity can greatly reduce these costs, as they can reduce the peak demand and create large demand side flexibility, postponing and reducing further investments in the electricity infrastructure. To make the transition affordable for all, all these costs (renewable energy production, transport, storage, distribution, use) must be considered together.
- Parameters in the multiple scenarios should consider interdependencies between electricity and gaseous fuels, especially biomethane. Renewable gases will be needed to bridge the mismatch between electricity demand and electricity supply due to intermittency of renewable electricity and daily and seasonal peak demand in heating. They may also play a role in off-grid rural areas (49.2 million European households live in rural areas¹) where networks are less developed and where substantial upfront investment in thermal isolation is very likely to be a barrier to adopting electricity-based renewable energy for heating.

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About the EBA

¹ Eurostat, 2022.

The **European Biogas Association** is the voice of renewable gas in Europe since 2009. EBA advocates the recognition of biomethane and other renewable gases as sustainable, on demand and flexible energy sources that provide multiple knock-on socio-economic and environmental benefits. Supported by its members, EBA is committed to work with European institutions, industry, agricultural partners, NGOs and academia to develop policies which can enable the large-scale deployment of renewable gases and organic fertilisers throughout Europe, supported by transparent, well-established sustainability certification bodies to ensure that sustainability remains at the core of the industry. The association counts today on a well-established network of over 200 national organisations, scientific institutes, and companies from Europe and beyond, including 1 TSO and 3 DSOs