

bne – Statement

ERGEG-Public Consultation: Draft Advice on the Community-wide Ten-year Electricity Network Development Plan (E09-ENM-16-03)

Berlin, 25.02.2010

1. The document presents the regulator's view on the planning process to achieve a non-binding Community-wide network development plan. Does this view contribute to the objectives set in the Section 2 and especially transparency of planning? What should be added / deleted within the planning process in this respect?

The planning process laid out in this document is comprehensive and reasonable. We understand that, due to the nature of this paper, ERGEG could not go into details, like the scenario development or the generation adequacy outlook. Thus key-elements of the planning process will have to be elaborated during the planning process. Therefore the stakeholder involvement and the supervision by the European regulators deserve special attention.

The stakeholder involvement is described in essence and contains the core requirements for a satisfactory consultation process. The details to this involvement are still to be developed by ENTSO-E. Without this detailed description a final assessment of the consultation process is not possible. According to section 4.5 TSOs should be authorized to request information from stakeholders. This kind of unconfined authorisation is not appropriate and disproportionate to the benefits that can be expected. Most of the required information is already known to TSO (i.e. requests for grid-access) or publicly available. It is in no way acceptable to give TSOs access to trade-secrets of the stakeholders. This kind of information, especially if related to future plans of the stakeholders, is of little relevance for the planning process due to its high level of uncertainty.

Regulators have to be involved in the planning process as well. An ex-post assessment as described in section 5.4 is unsatisfactory, as changes in the scenario development or the generation adequacy outlook would ultimately lead to a delay of the network development plan. Regulators should take a more active role in the consultation process and not restrain themselves to the supervision of the process.

2. The document describes the contents of the Community-wide network development plan. Does it reflect the topics needed for the plan? What should be added / deleted within the contents of the plan?

Part of the contents of the network development plan is the scenario development. In that scenario development we suggest to add the (change of the) geographical distribution of generation and consumption as an issue to be considered.

3. The document addresses European generation adequacy outlook. What should be added / deleted in this respect when ERGEG gives its advice?

The generation adequacy outlook should include an assessment of the availability of balancing power. The increase in intermittent wind-generation will increase the need for balancing power. An adequate availability of generation and balancing power is essential for the security of supply.

4. The document describes the topics (existing and decided infrastructure, identification of future bottlenecks in the network, identified investment projects, technical and economic description of the investment projects) for the assessment of resilience of the system. Is this description appropriate? Should it be changed and if so, how?

For the identified investment projects alternative investments are to be identified where appropriate. We agree, that alternative investments are important to consider. Besides those alternative investments, there are always several technical options for the main investment projects as well. Those alternatives have to be reviewed likewise because some of these options could be more easily implemented than others (e.g. cable vs. aerial line). The economic consequences for those options have to be stated and compared.

5. The document sets out criteria for regulatory opinion. Are these criteria clear and unambiguous? If not, how they should be amended?

Regulatory opinion should not only assess the form but also the content of the ten-year network plan. Inadequate scenario development or generation outlooks entail inadequate ten-year plans.

Even though the Electricity Regulation stipulates, that the ten-year network development plan is non-binding, it will nonetheless have high significance for the national regulators in their assessment of investment plans of grid operators. Furthermore, the development plan will be of great importance when legal measures are taken against the implementation of the projects. To serve both ends, the quality of the development plan has to satisfy high standards. Regulators have to ensure this high quality.

6. Compatibility between the national, regional and Community-wide ten-year network development plans shall be ensured. How can this compatibility be measured and evaluated? How may inconsistencies be identified?

./.

7. The Agency monitors the implementation of the Community-wide ten-year network development plan. Are there any specific issues to be taken into account in monitoring besides those described in the document?

./.