

## ENTSO-E's response to ERGEG's advice on the Community-wide ten-year electricity network development plan

## 24/02/2010

ENTSO-E welcomes ERGEG's advice on the Community-wide ten-year electricity network development plan (hereinafter the TYNDP) as a contribution towards the definition and clarification of the objectives of this undertaking and the roles of the stakeholders.

ERGEG's advice comes just a few weeks before the first pilot release of the TYNDP for public consultation, as decided by ENTSO-E, well ahead of the time when the 3<sup>rd</sup> Legislative Package is enforced. The decision for an extremely swift pilot release is motivated principally by the *urgency* of providing a TSO response to the industry's overwhelming reaction to European policies on climate change and materialised in the form of massive investments in renewable energy sources. ENTSO-E therefore considers this release of the TYNDP as a *pilot project* and the first general remark on ERGEG's Advice is related to this context.

Given the fact that the pilot TYNDP will be released 2 working days after the close of this ERGEG consultation, we consider it premature for ENTSO-E to comment in detail on this ERGEG advice. The 6-week consultation process on the ENTSO-E pilot TYNDP is perhaps the most important element of the TYNDP process. As such, we consider it more pragmatic to look at the combination of the feedback ENTSO-E receives from stakeholders and regulators on the pilot TYNDP itself, and the feedback ERGEG receives from stakeholders on its advice. We therefore propose to continue our close dialogue with ERGEG which has been a feature of this pilot TYNDP process in order to arrive at consistent post-consultation documents in May. This would also allow ERGEG to take into account the responses ENTSO-E receives as part of the "more formal" ERGEG advice to ENTSO-E on the pilot TYNDP.

The ERGEG advice correctly recognizes that there are many not yet completely solved questions around criteria, social welfare tests and development of scenarios. ENTSO-E states in its pilot TYNDP how we foresee developing these issues further in cooperation with ERGEG/ACER and the stakeholders over the coming few years in preparation for future releases of the TYNDP. The pilot and future releases of TYNDP will propose how these criteria and model questions can best be solved.

In conclusion, we foresee a stepwise approach where on the one hand the TYNDP will develop much further from the strong start of the current pilot and on the other hand regulatory advices would take into account these developments. However, this must be a result of wide ranging inputs from stakeholders, such that we can achieve consensus on the relatively complex methodological developments, e.g. agreement on the use of scenarios or on the multiple decision criteria, which will both be central to future TYNDPs.

Yours sincerely,

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