



**EREGG Public Consultation
on Draft Advice on the
Community-wide Ten-year Electricity
Network Development Plan
Evaluation of Responses**

**Ref: E10-ENM-22-03a
10 June 2010**

INFORMATION PAGE

Abstract

On 17 December 2009, ERGEG launched a public consultation on its Draft Advice on the Community-wide Ten-year Electricity Network Development Plan (Ref: E09-ENM-16-03). The draft advice outlined ERGEG's draft advice for the development of the Community-wide ten-year development plan, in accordance with the legislative requirements, as guidance for ENTSO-E's work in this area during the interim period.

This document (E10-ENM-22-03a) accompanies the final ERGEG advice (E10-ENM-22-03) and provides the evaluation of the responses to the public consultation on the Draft Advice. Section 1.3 includes a list of the respondents.

Target Audience

Transmission system operators, energy suppliers, traders, electricity customers, electricity industry, consumer representative groups, power exchanges, academics and other interested parties are the target audience for this discussion paper.

Related Documents

CEER/ERGEG documents

- "ERGEG Draft Advice on the Community-wide Ten-year Electricity Network Development Plan", 10 December 2009, Ref: E09-ENM-16-03 http://www.energy-regulators.eu/portal/page/portal/EER_HOME/EER_CONSULT/CLOSED%20PUBLIC%20CONSULTATIONS/ELECTRICITY/electricity%2010-year%20ntwk%20dev%20plan/CD/E09-ENM-16-03%20CW-Ten%20Year%20Plan_10%20Dec%202009.pdf
- "ERGEG Guidelines on Consultation Practices", 11 March 2009, Ref. E07-EP-16-03. http://www.energy-regulators.eu/portal/page/portal/EER_HOME/EER_CONSULT/E07-EP-16-03_PC-Guidelines_2009-Mar-11.pdf

External Documents

- Directive 2009/72/EC of the European Parliament and of the Council of 13 July 2009 concerning common rules for the internal market in electricity and repealing Directive 2003/54/EC. <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2009:211:0055:0093:EN:PDF>
- Regulation (EC) No 713/2009 of the European Parliament and of the Council of 13 July 2009 establishing an Agency for the Cooperation of Energy Regulators. <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2009:211:0001:0014:EN:PDF>
- Regulation (EC) No 714/2009 of the European Parliament and of the Council of 13 July 2009 on conditions for access to the network for cross-border exchanges in electricity

and repealing Regulation (EC) No 1228/2003. <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2009:211:0015:0035:EN:PDF>

- Decision No 1364/2006/EC of the European Parliament and of the Council of 6 September 2006 laying down guidelines for trans-European energy networks and repealing Decision 96/391/EC and Decision No 1229/2003/EC. <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2006:262:0001:0023:EN:PDF>

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1 Introduction

1.1 Recap of the ERGEG Consultation Paper

This document contains the evaluation by ERGEG of the comments received during the ERGEG public consultation on the Draft Advice on the Community-wide Ten-year Electricity Network Development Plan (TYNDP).

The public consultation was held from 17 December 2009 to 25 February 2010. The purpose of the public consultation was to provide ERGEG with the basis for the future EU-wide framework supporting the technical rules and codes of the EU synchronous areas on operational security.

1.2 Questions for Public Consultation

In addition to inviting stakeholders and market participants to provide general comments to the consultation and participate in the discussions on the document, ERGEG asked the respondents a number of specific issues related to the scope and applicability of the document.

The respondents were invited to provide comments on the following questions:

1. The document presents the regulators' view on the planning process to achieve a non-binding Community-wide network development plan. Does this view contribute to the objectives set in Section 2 and especially transparency of planning? What should be added / deleted within the planning process in this respect?
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?
3. The document addresses the European generation adequacy outlook. What should be added / deleted in this respect when ERGEG gives its advice?
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?
5. The document sets out criteria for regulatory opinion. Are these criteria clear and unambiguous? If not, how should they be amended?
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?

1.3 Responses received

21 responses were received from the following organisations:

| Organisation | Abbreviated name |
|--|------------------|
| Bundesverband der Energie- und Wasserwirtschaft e.V. | BDEW |
| Bundesverband Neuer Energieanbieter | BNE |
| EDF Energy | EDF Energy |
| Edison spa | Edison |
| Electricity de France | EDF |
| Energie Baden-Württemberg AG | EnBW |
| Energy Networks Association | ENA |
| Energy Norway | Energy Norway |
| EON | EON |
| European Chemical Industry Council | CEFIC |
| European Network of Transmission System Operators for Electricity | ENTSO-E |
| European Wind Energy Association | EWEA |
| GEODE - European independent distribution companies of gas and electricity | GEODE |
| Iberdrola | Iberdrola |
| International Federation of Industrial Energy Consumers | IFIEC |
| Nordenergi | Nordenergi |
| PSE Operator | PSE Operator |
| Svensk Energi | Svensk Energi |
| Swiss Federal Electricity Commission | EICOM |
| Swissgrid | Swissgrid |
| Vattenfall | Vattenfall |

2 Analysis of Responses

2.1 General

EREGEG has evaluated the comments provided in the public consultation, principally in terms of their applicability and consistency. For each comment, the following evaluation template has been used:

| # | Guidelines Reference | Original text of the comment | EREGEG evaluation | EREGEG explanation |
|-----------------------|--|------------------------------|--|--|
| <i>No. of comment</i> | <i>Guidelines section/chapter to which the comment refers to</i> | <i>original comment text</i> | <i>Yes (accept) or No (reject) or N/A (not applicable)</i> | <i>EREGEG explanation (especially if rejected)</i> |

The positively evaluated comments from public consultation will be incorporated into the final EREGEG advice.

This section contains the evaluation of all the comments, organised according to the above-mentioned template and assigned to the relevant organisations or stakeholders. The reference text of the Advice on the Community-wide Ten-year Electricity Network Development Plan is the one from the EREGEG public consultation. The comments have been quoted with their original format and contents as submitted by the organisations and stakeholders. The evaluation also contains the additional modifications to the advice, proposed by EREGEG following the public consultation, that were not delivered by any organisation or stakeholder, but were instead additionally recognised as needed and justified by EREGEG.

2.2 Evaluation of Comments received in the Public Consultation

| 2.2.1 EICom | | | | |
|-------------------------|-------------------|--|------------------|--|
| No | Chapter / section | Comment | Include (Yes/No) | Explanation |
| 1. | Question 1 | No information is provided how non EU member states shall be integrated in the process of network development. | Yes | See comment no. 1 from swissgrid. |
| 2. | Question 2 | National and regional criteria can be different within Europe. A regional approach is adequate. | No | This advice is for the community plan an a community approach is adequate |
| 3. | Question 5 | EICom is not in line with the objectives. The objective of the TYNDP shall be to lead to a well designed power system as described at the end of chapter 7 (reduction of physical congestions and efficient market integration). | Yes | See comment no. 1 from PSE Operator S.A. |
| 4. | Question 6 | Socioeconomic conditions differ from region to region. Regional approach is supported. | N/A | see 2 |
| 5. | Question 7 | EICom is confident that appropriate coordination mechanisms with the NRAs will be found. | N/A | General comment. |
| 2.2.2 PSE Operator S.A. | | | | |
| No | Chapter / section | Comment | Include (Yes/No) | Explanation |
| 1. | Question 5 | Beside the objective of the TYNDP to eliminate the physical congestion where it is considered to hinder the development of the cross-border trade and market integration the TSOs are according to Article 12 of Directive 2009/72/EC responsible for contributing to security of supply through adequate transmission capacity and system reliability and the essential objective is to safeguard security of | Yes | Included additional sentence in chapter 7. <ul style="list-style-type: none"> • <u>Safeguard security of supply</u> |

| | | electricity supply first and foremost within our national system. This basic rule should be taking into account in the process of adopting and implementing the Community-wide ten-year network development plan and should be mention in ERGEG's draft advice. | | |
|-----------------|-------------------|---|------------------|--|
| 2.2.3 Swissgrid | | | | |
| No | Chapter / section | Comment | Include (Yes/No) | Explanation |
| 1. | Question 1 | General agreement. It should be considered that the European electricity grid is a very close connected system. It is therefore necessary to involve the parties depending on their functional connection to the system and not on their political membership. | Yes | TYNDP advice describes a process that should include the European grid system as a whole. New sentence included in chapter 5.3 <u>Further, it is necessary to involve relevant stakeholders depending also on the functional connection to the system.</u> |
| 2. | Question 2 | The implemented market models in Europe have many drawbacks especially concerning the lack of adequate location signals for generation. | No | It is not the task of the TYNDP to create a new market model or to provide i.e. signals for new generation. |
| 3. | Question 3 | Consider obligations for producers to deliver the most reliable information to the TSOs as necessary. | No | The obligation to deliver information for stakeholders is already stated in chapter 4. |
| 4. | Question 3 | It must be mentioned that there are additionally heavy uncertainties concerning the political and public acceptance of specific technologies, e.g. nuclear energy for electricity generation. | N/A | Political and public acceptance is outside the scope of the advice. ENTSO-E must define criteria for generation adequacy that have to consider uncertainties. |
| 5. | Question 4 | The difficulty will be to agree on an acceptable level of congestions in cross border trade. | N/A | General comment. |
| 6. | Question 5 | Missing is security of supply as criteria. | Yes | See comment no. 1 from PSE Operator S.A. |
| 7. | Question 5 | Regulators should provide a regulatory framework which incentivises grid infrastructure | N/A | Regulatory framework is important but not part of this advice. |

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| 8. | Question 6 | It is necessary that rough guidelines for grid planning are defined top-down in a centralized approach and that all affected parties are appropriately involved. It also should be possible for affected parties to veto development plans. Additionally the detailed planning of the grid should be made on national level. | No | It is important to ensure that stakeholders and different parties are involved when developing projects for the plan. If a project is important at European level it should still be included in the plan. There shall be a detailed planning in the community plan for cross-border projects because these are the projects that need to be adjusted Europe-wide and that could even possibly lead to changes in the national plans. |
| 9. | Question 7 | It should be considered that TSOs are in the first place bound to national law. | N/A | National laws should comply with the European regulation. |
| 10. | Question 7 | National authorities should be involved in all decisions and plans as early as possible. | No | The advice already states that all affected parties should be involved where necessary. |

2.2.4 Bne

| No | Chapter / section | Comment | Include (Yes/No) | Explanation |
|----|-------------------|---|------------------|--|
| 1. | Question 1 (4.5) | 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. | No | Especially for longer planning time period, the TSOs need to be allowed to ask for information as they i.e. will have No requests for grid access for 5 to 10 years from now. Of course, the data needs to be handled with great care. |
| 2. | Question 1 (5.4) | 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. | No | Already included in chapter 5.3 that NRAs and other national and European authorities are stakeholders that will be involved in the process. |

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| 3. | Question 2 (6.2) | In that scenario development it is suggested to add the (change of the) geographical distribution of generation and consumption as an issue to be considered. | Yes | Chapter 6.2 gives just the minimum to be considered. In the 5 th paragraph, an additional bullet point is added: (change of) geographical distribution of generation and consumption. |
| 4. | Question 3 (6.3) | The generation adequacy outlook should include an assessment of the availability of balancing power. | No | This is already implied in the last 2 paragraphs. |
| 5. | Question 4 (6.6.3) | Besides alternative investments, there are always several technical options for the main investment projects. 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. | Yes | Included in chapter 6.6.3 that alternative investments also includes technical options. Added “ <u>... taking in account feasibility issues.</u> ” and “ <u>The economic impacts of alternative investments and of technical risks on projects should therefore also be stated.</u> ” |
| 6. | Question 5 | 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 tenyear plans. | Yes | The first sentence of chapter 7 paragraph 4 was adapted: The Agency, when forming its opinion on the plan, will evaluate <u>each step and assumed outcome of all parts of the TYNDP process described in this advice including especially</u> whether the following processes and issues have been executed and fulfilled: ... |
| 7. | Question 5 | Regulators have to ensure the high quality of the TYNDP as will have high significance for the NRAs in their assessment of investment plans of grid operators and will be of great importance when legal measures are taken against the implementation of projects. | N/A | General comment. |

| 2.2.5 Vattenfall | | | | |
|------------------|-------------------|---|------------------|---|
| No | Chapter / section | Comment | Include (Yes/No) | Explanation |
| 1. | General comment | Regulators and the Commission are urged to jointly appoint a coordinator with the mission to follow-up on the operations and development of the European transmission grids. One of the main tasks of the coordinator could be to work on best practice for licensing and concessions of infrastructure development projects. it is important that ACER and the national regulatory offices as far as possible build competences and resources enabling regulators to develop the right set of process and criteria to evaluate ENTSO-E's proposals. | N/A | General comment. |
| 2. | | ERGEG is urged to ensure that the published material includes information and calculations on the individual control areas so that the consistency check bottom-up versus top-down is transparently described for regulatory approval. ERGEG, should explicitly require ENTSO-E in an annex or similar, to include and publish the national considerations/-analysis made by individual TSOs as input to the TYNDP. | No | The TYNDP shall publish a community wide approach on detailed regional plans. |
| 3. | | ERGEG is urged to work for an implementation of formal requirement for the unbundled TSOs to develop TYNDPs under the supervision of the respective national regulator. | N/A | Important statement but not able to be included in the advice. |
| 4. | | Regulation must offer incentives and conditions which make investments attractive. Additionally licensing procedures must be accelerated and harmonized internationally. Regulators should use their influence to politics to ensure designing a suitable legal framework for TSOs. In a similar way | N/A | General comment, not applicable for the advice. |

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| | | regulators should play a more active role in the public debate about new transmission lines in order to support public acceptance. | | |
| 5. | Question 1 | The TYNDP lacks a consistent reporting from the TSOs on the current use of the transmission grid, where bottlenecks are located, the amount of time that certain areas are congested, and the reasons for the congestion. It should clearly be a part of a development plan to map the current status of operations of the infrastructure to be developed. | Yes | <p>Added to chapter 6.1</p> <p><u>Furthermore, a consistent reporting on the current use of the transmission grid, the location of bottlenecks, the amount of time that certain areas are congested and the reasons for the congestion must be included in the plan.</u></p> <p>And added to chapter 6.6.1</p> <ul style="list-style-type: none"> • <u>Main current bottlenecks and impacts on cross-border transmission capacity;</u> |
| 6. | | The criteria for making the choice of which projects are considered should be published. | No | Everything that is described in chapter 6 shall be part of the TYNDP. Choice of projects is included. |
| 7. | | A description on how the project is financed is added as a criterion under section 2 in the draft. This will increase transparency with regards to whether or not the outlook for financing has been used as informal selection criteria. | No | Financing and cost sharing should not be an important issue on the long term planning. This might be an obstacle to ensure that all important projects are included. |
| 8. | Question 2 6.5.2 | All benefits and costs that are included in the investment calculation should be transparently described. The economic criteria listed under section 6.5.2 should preferably also include “distribution of benefits”. | Yes | <p>In chapter 6.5.2</p> <p>Economic criteria must be based on socio-economic evaluation of the benefits and costs of the possible investments at European level.</p> <p>Changed to:</p> <p><u>Economic criteria should assess the European social welfare arising from possible investments in order to select optimal solutions. These solutions must be based on socio-economic evaluation, at European level, of the benefits and costs of the proposed investments. Cost and benefits must be properly described.</u></p> |

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| 9. | 2. | The draft advice should benefit from including the regulatory opinion on how they perceive certain benefits to be quantified or evaluated in a qualitative setting. | No | The advice includes the minimum. |
| 10. | 6.5.2 | As the regulator is approving the investment it is recommendable that she also define the economic criteria for the socio economic evaluations. | N/A | Outside scope. |
| 11. | | In order to ensure full transparency, ERGEG, should explicitly require ENTSO-E in an annex or similar, to include and publish the national considerations/analysis made by individual TSOs as input to the 10 year development plans. | Partially | National plans will also must be made available – from ENTSO-E's web pages. The list of investment project should be included as an annex. Included in chapter 8. |
| 12. | | In the earlier development of the infrastructure, gains were made by connecting for example hydro-based systems with thermal systems. In the spirit of the 20-20-20-goals the first development plans should discuss the issue of how CO2-neutral generation should reach systems which have a deficit of such generation, and how crowding out of such CO2-neutral resources when the renewables targets are met, can be avoided. | N/A | This is not an issue of the TYNDP. |
| 13. | | The community wide TYNDP should include a proper sensitivity analysis that reveals how the proposed investments are affected by different assumptions. | Partially | See later comment from Nordenergi. <u>Added to chapter 6.6.3: "This analysis should be driven in relation to corresponding scenarios and to that end should highlight, where appropriate, the sensitivity of the investments needs depending on the different scenarios."</u> |
| 14. | Question 3 | Thus the demand to disclose investment plans may be too far reaching, unless kept strictly confidential. | No | Nothing published shall include strictly confidential information but this should be clear to all parties so nothing needs to be added to the advice. |
| 15. | | Stakeholders should accommodate the data collection process by providing information on already decided and licensed projects as these are already publicly available but may be costly for the TSO to collect. | No | Chapter 4.5 already states that. |

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| 16. | | It is the stakeholders' responsibility to argue for or against the scenarios put forward by the TSOs. Whether a stakeholder has strong enough arguments to change the scenarios must be determined by the regulators. However, as long as the stakeholders' plans are not licensed the process as envisioned by ERGEG invites to strategic data disclosure (cheap talk in economic lingo) to affect the shaping of the TYNDP. | No | ERGEG/ACER will have to give a detailed look on the scenarios taking stakeholders opinion into consideration. |
| 17. | | The evaluation of generation adequacy should be extended to comprise also a zero alternative. This alternative should address the uncertainty that decided and planned generation and transmission projects are not carried out. The paper must further clarify the criteria for judging a potential future investment to be considered as planned or decided. | No | Only realistic alternatives shall be addressed. |
| 18. | | The plan should explicitly show what technical and policy measures will be used to meet extreme situations and the future need for balancing power within an area as these issues will be more critical as the energy system approaches the 20-20-20 targets. | No | General comment, as it is clear that the 20-20-20 targets are not the only problems to be solved. |
| 19. | Question 4 6.6.1 | Section 6.6.1 should be extended to in addition to interconnections also include transmission usage and congestions within every TSO control area. | Partially | Projects within a control area should only be included if they are important for cross-border issues. The rest is up to the national plans. Added in chapter 6.6.3: <u>"In particular, this should include investment needs on upstream internal network, without which the efforts for integration of the European electricity market would result in limited gains. The project owner of identified projects should be included when available."</u> |
| 20. | Question 6 | ERGEG and the national regulators are urged to strengthen the legislation beyond what is said in the directive by requiring of the TSOs that national plans is produced annually also in member states | N/A | General comment on legislation and regulators business. |

| | | with ownership unbundled TSOs. | | |
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| 21. | | The national plans should be on a detailed level i.e. reflect the characteristics of the transmission network and not only be restricted to cross-border connections. | N/A | Yes, but that is not part of the community plan. |
| 2.2.6 EDF | | | | |
| No | Chapter / section | Comment | Include (Yes/No) | Explanation |
| 1. | General comments | Regular assessment of the process should guarantee that permanent interactions between generation investment decisions and network development scenarios are effectively taken into account. | N/A | The TYNDP should ensure this interaction. |
| 2. | | Transparency can be usefully improved by publishing not only scenarios and results but also the network and generation data used during the analysis, in respect with confidentiality aspects that private investment require; | Partially | Included in chapter 6.4 that assumptions must be included. |
| 3. | | Greater harmonisation of TSO's data, methods and criteria shall be accomplished. | N/A | This is going to develop in the ongoing work on the TYNDP. |
| 4. | | Regulatory or practical gaps concerning cross-border cooperation that impede the development of integrated markets should be assessed; ERGEG's proposal for a review of barriers seems an appropriate solution. | N/A | |
| 5. | Question 1 | More detailed data should be published on public transmission systems and their development. For example, in addition to scenarios, planning principles and results, a network data model should be communicated. A simplified European network model for different time scales (5-10 year – peak/off peak) would help investors to make accurate projections. More transparency in network data shall | No | Level of detail for such a model would be challenging do to confidentiality among others. |

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| | | improve the quality of information collected from stakeholders. | | |
| 6. | | The criteria for planning decisions by the TSOs should be more detailed and explicit. | Partly | Added to chapter 5.2: <u>The Community-wide ten-year network development plan must include all projects that are important for cross-border issues, this could include also inner-TSO-lines.</u> |
| 7. | | Harmonisation of data, assumptions and models should be developed among the different member states and the European generation adequacy outlook should not be a simple patchwork of national models underestimating thereby interconnection bottlenecks. | No | That is the goal of the advice. |
| 8. | Question 2 | Commercial capacity data should also be published. | No | Agree and this is already in the document. Ownership should not be relevant. All relevant information from stakeholders has to be included when possible. |
| 9. | | Technical and economical studies should be led among TSOs, on common grounds, to guarantee a better compatibility of national data and criteria, which would help better integration of the plans at regional and Community levels. | N/A | Not part of the advice. |
| 10. | | Projects should be classified according to their degree of maturity, or feasibility. Thus, the appreciation of the maturity of a project should be defined more clearly. | Yes | Added in chapter 6.6.3: “The Community-wide ten-year network development plan should, where appropriate, identify alternative investments to fulfil transmission needs and accordingly adjust the plans to needs of integrated electricity markets, <u>taking in account feasibility issues.</u> ” |
| 11. | Question 3 | European Generation Adequacy should go beyond the present UCTE System Adequacy Forecast. The role and impact of interconnections on the European Generation Adequacy analysis should be clearly identified in that respect. | N/A | The advice is on the TYNDP. The question addressed the content of the chapter on generation adequacy not the report itself. |

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| 12. | Question 4 | The identification of future bottlenecks in the network could also be extended to the identification of persisting weaknesses in national networks, with direct or indirect impacts on cross-border flows. | Yes | The TYNDP should include an overview over current use and status of the grid as described in 6.1. Added in chapter 6.6.3: <u>“(f) Identify persisting weaknesses and assess impacts on cross-border transmission capacity.”</u> |
| 13. | Question 5 | The question of valuation of these different criteria is still not fully addressed and the weighting of the different criteria shall be somehow clarified. | No | No valuation will be given in the advice. The TYNDP in developing and at the end all the criteria should be fully addressed. |
| 14. | Question 7 | The implementation of the development plan could also be monitored with a quantitative approach relying on indicators related to market integration. | No | The implementation must be monitored but this is not included in the advice. |

2.2.7 CEFIC

| No | Chapter / section | Comment | Include (Yes/No) | Explanation |
|----|---------------------------|--|------------------|--|
| 1. | General comment 2, 6.1 | ENTSO-E announced there will be a study on the optimum design of the European grid in the year 2050. For this reason it should be added in the objectives (§ 2+6.1) and the top-down approach carried out by ENTSO-E that new projects need to be in line with this optimum. | Yes | Added in 6.6 intro: <u>Assessment of resilience of the system must show the resilience of projects towards society expectations in terms of technical and economic criteria described. This assessment should highlight the essential projects that meet European challenges and must also put long-term challenges, beyond 2030, into perspective.</u> |
| 2. | Question 2 6.2 | “Price of electricity” is not sufficient; scenarios should address both: <ul style="list-style-type: none"> the electrical energy price and the transmission costs Because: <ul style="list-style-type: none"> a project increasing transmission tariff may decrease energy price thanks to more competition; the sum is the cost the consumers pay, to be | Partly | In chapter 6.2: “price of electricity” is changed to “ <u>market price of electrical energy</u> ”. Transmission cost is more of a national issue and not relevant on this level of planning. |

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| | | optimized. | | |
| 3. | 6.4 | The software modelling the market should not be limited to a “perfect market” but should integrate the actor’s comportment, observed during the previous years. | Partly | General comment. Added in chapter 6.4: <u>Both should satisfy scientific and planning standards</u> |
| 4. | 6.5.2 | It is important to consider the real cost of an industrial plant shortage and not the compensation paid by TSOs. For both, too high “all in” electricity prices and industrial plant shut-downs caused by too poor power supply reliability, the economical impacts of long-term activity delocalization should be considered. | No | Plans will take into account economic criteria, but cost for different plants when it comes to evaluation of SoS is too detailed for a community plan. |
| 5. | Question 3 | One has to be careful with regard to an “enhancing demand response”. An industrial site will try to produce 100 % of its capacity, to minimize its costs. The largest part of the industrial consumption is inelastic. | N/A | General comment. |
| 6. | 6.3 | The “European Generation Adequacy Outlook” should give explicit alarms when the power plants foreseen by the previous plan are not build and when the construction decision becomes critical with regard to construction delay and deadline to avoid lack of generation capacities. | Yes | Added to chapter 6.3: <u>When updating the plan, ENTSO-E must highlight significant developments and changes to the last plan (delays, etc.) and consider the consequences they cause to the TYNDP.</u> |
| 7. | Question 4 | Each project should be studied with regard to its economic criteria and publish the expected impacts in the concerned Member States on both: <ul style="list-style-type: none"> • the electrical energy price and • the transmission costs (tariff). | N/A | Not an issue for the community plan. |

| 2.2.8 BDEW | | | | |
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| No | Chapter / section | Comment | Include (Yes/No) | Explanation |
| 1. | General comment | Since it is a long term forecasting tool, it can not be binding in terms of demand and supply, because the political environment as well as the technology is subject to constant changes over time. Accordingly, this fact needs to be taken into consideration. | No | Clearly, there can be changes in the implementation but these must be considered in the TYNDP before and analysed in the upcoming plan. See i.e.6.3 or 6.6.3 b and c. |
| 2. | | It has to be noted, that an advanced planning and investment process leads to additional costs. The Regulation (EC) 714/2009 gives indications on the cost recovery via grid tariffs. This issue is not yet addressed in the draft but it should be considered as a basic requirement to ensure a high quality especially for incentive regulation systems' "cost recovery". | No | Tariffs are not addressed in the advice. |
| 3. | Question 1 | taken the number of envisaged consultation on different levels we recommend streamlining the process and focusing on two steps: <ul style="list-style-type: none"> • Top-down approach • Draft plan (national, regional, Community-wide) = bottom-up | No | That is exactly what is expected and written in the advice. |
| 4. | | To meet the integration goal and the grid connection and access requirements of the grid users, it is important not to restrict the TYNDP to cross-border connections only. Bottlenecks within the regions may hinder the objectives as well. | Partly | The TYNDP has to include all projects and information that are important for cross-border issues. Of course, this is not limited to cross-border lines but to all lines that are important to these issues including inner-TSO lines. This should be clear from the advice. <u>Added to 6.6.3: "In particular this should include investment needs on upstream internal network, without which the efforts for integration of the European electricity market would result in limited gains. The project owner of identified projects should be included when available."</u> |

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| 5. | | We urgently recommend ERGEG, respectively ACER to challenge ENTSO-E as well as national TSOs to propose and implement specific projects that generally contribute to market integration. | N/A | General comment that states the purpose of the TYNDP. |
| 6. | | For the bottom-up process it is also essential to closely involve the DSOs in a well designed manner because in many regions major parts of the intermittent generation feed into the transmission grids of the distribution level. | No | This is already stated in the advice. ENTSO-E has to think when to involve whom best. ACER will give its opinion on this, too. |
| 7. | Question 2 | Planning rules: What are the technical planning criteria for the TSOs? There should be at least a common understanding of the n-1-criterion, the use of dynamic rating (overhead line rating), how to consider the use of system automatics? | No | The advice is not the place to make definitions. |
| 8. | | Existing and future national bottlenecks of each TSO should be added. The restriction to cross-border bottlenecks will hinder the objectives outlined in section 1.2. | No | See no.4. |
| 9. | 6.6.3 | It is necessary to give a clear indication of who remains responsible if single projects of the previously adopted plan have not been implemented (see 6.6.3 b). | No | Chapter 6.6.3 c includes the description of changes in the plan that minimum needs to be included. |
| 10. | Question 3 | The generation adequacy outlook should serve as a guideline and should cover the overall adequacy of the electricity system to supply current and projected demands for electricity. However, conclusions should be drawn with the full awareness that the information for generation might change over a period of 10 years. | No | See no.1. |
| 11. | Question 4 | In addition to the economic criteria stated, also instruments for market based management of congestions and the related costs shall be taken into consideration as well. | N/A | Not relevant in the long term planning. Relevant for TSO cooperation in general. |
| 12. | 6.6.1 | Concerning the existing and decided infrastructure (section 6.6.1), information can be given on existing transmission capacity and on additional transmission capacity decided to be built, but not on | No | It is obvious that some data are not available yet but as they are needed they must be investigated (via study or else). |

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| | | the rate of transmission capacity use on an annual (and monthly) basis for the previous 5 years. These data are not yet available and further studies are necessary to get them. | | |
| 13. | Question 5 Chapter 7 | We miss a thorough evaluation of the identified investment projects and ACER's statement whether they fulfil the objectives under section 2 of the consultation paper, respectively ENTSO-E's priorities as set forth by the consulted planning premises, scenarios etc. Therefore, we recommend evaluating the plan, inter alia, under a market integration perspective. | Yes | See chapter 2.2.4 no.6 |
| 14. | Question 6 | From a market perspective, we could only evaluate consistency whether an identified infrastructure shortfall in one market or between two markets will lead to an identified investment project in all of the network development plans. Therefore, we consider a central consultation of the Community-wide network development plan with national annexes, outlining national investment projects, as sensible. | No | This is part of ACER's work (see comment above). |
| 15. | | There should be a clear link between data published in the framework of transparency on grid data and the TYNDP. | N/A | |
| 16. | Question 7 | A status review of the previous plan, as mentioned in section 6.1, should be included; an additional specific monitoring is not necessary. The status review should include the issues indicated in section 9. | Partly | Both are necessary. One is the duty of ENTSO-E the other duty of ACER. To make it clearer- following paragraph was moved from chapter 9 to chapter 6.1: "A monitoring report is to be included in the Community-wide ten-year network development plan to identify any deviations in implementation from the previous ten-year network development plan. Any known reasons for such deviations should be also explained in the monitoring report. The monitoring report will provide an update on delays affecting any investment included in the previous plan. Furthermore, TSOs should provide reasons for not proceeding with delayed or cancelled investments. " |

| 17. | | ACER is expected to recommend to the European Commission any improvements that would overcome common reasons for inconsistencies for a more effective enhancement of Europe's electricity infrastructure. | N/A | Political issue. Not part of the advice. |
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| 2.2.9 EDF Energy | | | | |
| No | Chapter / section | Comment | Include (Yes/No) | Explanation |
| 1. | General comment | There would appear to be an inaccurate and unfortunate assumption throughout the present draft document that interconnectors are always TSO led. This need not always be the case. It would therefore be helpful if there were explicit references made to Merchant Interconnectors in the next draft. | No | This is already included. The plan shall include both regulated and exempted (according to Article 17, Electricity Regulation) investment projects. |
| 2. | | Information sent in by the TSOs to ENTSO-E for inclusion in the Ten year plan should include information for both TSO-led and Merchant Interconnectors on: existing interconnectors, those under construction and those planned facilities that have signed connection agreements. | No | See no.1- nothing to change. |
| 3. | | Even DC systems require a considerable number of scenarios to be tested, as the potential for imports and/or exports is considerable. Great Britain and Ireland are island systems, only interconnected to each other and to the continental power system by relatively weak HVDC interconnectors. Therefore they are not subject to the through-flow problems experienced on the wider continental European system. Nevertheless the need for joint planning still exists. | No | As long as the lines are important they should be included in the TYNDP. The advice does not decide between AC or DC. |
| 4. | | There needs to be recognition within the Network Development Plan that the GB system operates to | No | The community-plan shall be based on overall (minimum) standards). That does not hinder single TSOs or member |

| | | an N-2 security standard, as opposed to the N-1 criteria on the continent. The technical criteria will therefore be different either side of the Anglo-French and BritNed interconnectors. | | states to set stricter rules. |
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| 2.2.10 Edison | | | | |
| No | Chapter / section | Comment | Include (Yes/No) | Explanation |
| 1. | General comment | The national and Community ten-year network development plans shall include both regulated and exempted investment projects as well as ensure a sufficient level of cross-border interconnection open to TPA. Exempted investments, therefore, seem to be allowed, providing that they do not exceed a fixed amount of cross border capacity. ERGEG is asked to better clarify this issue since privates may play a relevant role in future transmission grid development. | No | See chapter 2.2.9 no 1. |
| 2. | Question 3 | To involve reliable international institutions and organizations (e.g. Eurostat, IEA etc.), whose scenarios should be duly taken into account by ENTSO-E and national TSOs as a term of reference while fixing the demand and generation level to be used for the planning process; this will allow to guarantee the neutrality and reliability of the resulting generation adequacy outlook and energy market scenarios and their consistency with the forecasts of macroeconomic development of Europe on medium and long term. | No | Relevant Stakeholders must be involved also in the scenario development process but the advice cannot set specific organisations to be taken. |
| 3. | Question 4 | The draft advice falls out from the 3rd package provisions specifying that the plan shall include a detailed analysis aiming to choose the specific investment to be promoted. Instead, the Community Plan has to limit to address lacks in transmission grids and to propose new infrastructure to be built to release congestions. The choice of the specific | No | ENTSO-E has to elaborate the most necessary investments otherwise the TYNDP would be nothing more than a simple summary of the national plans. Of course, this also includes and is only possible by giving one project another priority than the other. |

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| | | investment is eventually made by the relevant TSOs. | | |
| 4. | | In some European regions an efficient use of the local generation capacity is not allowed due to relevant congestions which have No impact on cross border trade. These are obvious cases in which the national transmission grid shall be developed to accommodate the growth in generation facilities. Within the new perspective drawn in the draft advice regarding the Community plan, TSOs seem to be fostered mainly towards cross-border development, while internal investments are less incentivised. Nonetheless Edison thinks that national investments are as important as cross border ones, in order to promote an efficient energy market: clarifications from ERGEG about these points are thus welcomed. | No | The advice just concentrates on the community plan. |
| 5. | Question 1 | In order to achieve an adequate level of transparency and to avoid any biased evaluation, a common shared network model has to be adopted and made available to either public and private investors. | No | The advice already states that ENTSO-E (plus stakeholders involved) has to develop a network model as a part of the TYNDP. There cannot be any advice telling ENTSO-E to make the detailed network model available to everybody. |
| 6. | Question 5 | regulatory assessment shouldn't be limited to procedural issues, as it comes out from the consultation document, but it should be extended also to the contents of the plan. For instance, an evaluation of reliability and accuracy of the market scenarios and models included in the 10-yendp would be useful in order to detect inconsistencies which can be detrimental to the correct assessment of investment needs. | Yes | See chapter 2.2.4 no. 6 |
| 7. | Question 6 | Thus regulators must ensure that national and regional network plans are able to maximize the local dispatching capacity which is essential both to avoid bottlenecks downstream of cross-border | Partly | See 4. Added to 6.6.3 : "In particular, this should include investment needs on upstream internal network, without which the efforts for |

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| | | interconnections and to allow an efficient use of the local generation facilities. | | <u>integration of the European electricity market would result in limited gains. The project owner of identified projects should be included when available.</u> |
| 8. | Question 7 | Roles and responsibilities of ENTSO-E, the Agency and NRAs should be further clarified. | No | No details are provided in the consultation comment. |

2.2.11 Svensk Energy (Swedish stakeholders organisation)

| No | Chapter / section | Comment | Include (Yes/No) | Explanation |
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| 1. | General comments | Svensk Energi urge ERGEG to work for an implementation of formal requirement for the unbundled TSOs to develop TYNDPs under the supervision of the respective national regulator in order to ensure that individual plans and reinforcements of the individual plans are aligned with the EU-wide need for network development. | (N/A) | The scenarios between the different levels will also need to be coordinated as mentioned in the advice. A national non-binding plan will have to be developed by all TSOs, but it is outside the scope of this document to make suggestions for other national regulation. |

2.2.12 Nordenergi (The joint collaboration between the Nordic associations for electricity producers, suppliers and distributors)

| No | Chapter / section | Comment | Include (Yes/No) | Explanation |
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| 1. | General comment (Section 6.6.1) | To better understand future needs in the network, it is important that the TYNDP includes an evaluation of how the grids are currently used, i.e. highlight current bottlenecks and loop flows in and between the internal grids (referring to section 6.6.1). | Yes | Chapter 2.2.5 no 5 |
| 2. | Question 1 (Section 7) | The stakeholders involvement should be added in the criteria for regulatory opinion. | No | The involvement of stakeholders is supposed to be an important part of the evaluation process and is included in the advice. |
| 3. | Question 1 | Transparency is important- models and not just results should be presented and discussed with stakeholders. | No | ERGEG agrees that transparency is important and this is included in advice in chapter 5.3. |

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| 4. | Question 1 | Transparency could be obtained by including information and calculations on the individual control areas in the Annex of the plan. | No | This should be part of the national plans and it would simply be to much information in the community plan. |
| . | Question 2 (section 6.5.2) | Increasing cross-border trade should not be a goal in itself, but the maximizing of social welfare on European level. The calculations have to be based on European social welfare to ensure the most economical investments for Europe as a whole (referring to section 6.5.2). National views would create non-optimal solutions. | Partially | Increasing cross-boarder trade is essential to maximize the social welfare on European level. ERGEG agrees that national solutions can create non-optimal solutions. In chapter 6.5.2: Economic criteria must be based on socio-economic evaluation of the benefits and costs of the possible investments at European level. Changed to: <u>Economic criteria should assess the European social welfare arising from possible investments in order to select optimal solutions. These solutions must be based on socio-economic evaluation, at European level, of the benefits and costs of the proposed investments. Cost and benefits must be properly described.</u> |
| 6. | Question 2 | Identifying the priority of cross-border investments, the economic criteria is the most important. The economic evaluation of new cross-border capacity takes into account the needed grid enforcements in the national grids. The technical requirements are a part of the economic evaluation. | No | Technical and economical criteria must both be met to ensure the planning goals. |
| 7 | Question 3 | It is crucial that stakeholders are closely involved in the process when making the outlook | No | Stakeholder involvement is already stated in chapter 4. |
| 8 | Question 4 | When identifying the needed new transmission capacity a special attention must be given to the investment needs of national grids and the bottlenecks in those. | Partially | Relevant when the bottlenecks are important on a community level. Added to 6.6.3 : <u>“In particular this should include investment needs on upstream internal network, without which the efforts for integration of the European electricity market would result in limited gains. The project owner of identified projects should be included when available.”</u> |

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| 9 | Question 5 (referring to section 7). | In the Regulatory Opinion the Agency must emphasize that new investments are taken from a European perspective | N/A | See 5. |
| 10. | Question 6 | Compatibility between national plans and TYNDP should be better described. The links between the national development plans made by Independent Transmission Operators, Independent System Operators, and Transmission System Operators in relation to the TYNDP should be clarified. | No | National plans are outside the scope and compatibility is already included in chapter. |
| 11. | Question 6 (referring to section 5.3) | Nordenergi urges the regulators to push for all member states to deliver national plans (TYNDPs), also where the TSO is unbundled. | N/A | Outside the scope of this task. |
| 12. | Question 7 | In case there has been delays in implementation of the plan, a follow-up should be defined. | No | Though the Agency will monitor the implementation and give notice when delays are seen, the follow up of investment decisions and licensing are outside the authority of the Agency. |
| 13. | Question 7 | Specific guidelines for the implementation are needed. | No | See above |
| 14. | Question 7 | Licensing procedures should be harmonised | N/A | See above |

2.2.13 International federation of industrial energy consumers (IFIEC)

| No | Chapter / section | Comment | Include (Yes/No) | Explanation |
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| 1. | Question 1 | It is important to note that there may be a difference between a solution which increases cross-border/interconnector capacity in such a way that removes congestion and a solution which brings about the most economical optimizing cost, securing supply and inducing affordable energy (sum of energy price, | No | This is outside the scope of the plan. |

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| | | transmission cost, distribution cost and balancing, etc) to allow industry to be globally competitive | | |
| 2. | Question 2 | The content of the Community-wide network development plan should also focus on -Optimum base load power plant investments to avoid unnecessary reinforcement of network interconnections. -Competitive prices for base load and peak load for energy intensive industries. -National generation mix and generation capacity. | No | This should be part of the input for the work, but not a focus in the plan. |
| 3. | Question 2 (section 6.2) | “Price of electricity” is not sufficient; scenarios should also address other cost elements as tariffs and balancing cost to optimize on total energy and grid cost as seen by the consumers pay. | No | The consumer price, distribution of social economic benefit, not directly used when using social economic criteria. |
| 4. | Question 2 (section 6.4) | The market model should not be limited to a “perfect market” but should integrate the actor’s actions, observed during the previous years. (f.i. what is the ratio price/cost of the offers ? Do generators invest ?) | No | The demands for model is already challenging and should involve the most relevant aspect- although not all. |
| 5. | Question 2 (section 6.5.2) | Concerning the risks and costs of shortage, it is important to consider the real cost of an industrial plant shortage and not the compensation paid by TSO. . | No | Level of detail makes it difficult to include in the advice. But it is however important that the best available estimates for cost to society with interruption is used. SoS is an important aspect and goal in the plan. |
| 6. | Question 2 (Section 6.5.2) | For both, too high “all in” electricity prices and industrial plant shut-downs caused by poor power supply reliability, the economical impacts of long-term activity delocalization should be considered | No | See above |
| 7. | Question 3 | The “European Generation Adequacy Outlook” should give explicit alarms when there are delays in the installation of new capacity. | Yes | A description of development since last GAF should be included see chapter 2.2.7 no.6. |
| 8. | Question 4 | In the economical criteria we should avoid market integration where existing price differentials within regions end up in a global alignment to the highest price range. | N/A | General comments, goes against market integration goals of the EU. |

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| 9. | Question 4 | Current market functioning does not guarantee competitive price for the base load consumption, severely impacting the competitiveness of the European industry in the global international context. IFIEC does not believe that in the present electricity market, industrial consumer's benefit from nuclear competitive advantage. | N/A | General comments |
| 10. | Question 5 | The main objective "To eliminate the physical congestion where it is considered to hinder the development of the cross-border trade and market integration" should also include the need of effective competition and price competitiveness for base load consumers and peak load consumers. Looking at the market today, there is competition but it's mainly limited to the commercializing sector which represents a minimum percentage of the total price of electricity formation. We must focus on solutions that will guarantee prices going back to real cost fundamentals. | No | Effective competition is included in paragraph 5 of chapter 7 as one goal to achieve. |
| 11. | Question 6 | The compatibility is ensured by a check list of items such as e.g. The effective price paid by the energy intensive consumers using base loads is not artificially increased endangering their competitiveness in global international context. | N/A | General comment |
| 12. | Question 7 (section 4.5) | In the point 4.5 Stakeholders, the industry associations should explicitly be mentioned. | Yes | Added in chapter 4.5: "The involvement and consultation of stakeholders, such as producers, traders, suppliers, <u>industries</u> , customers and distribution system operators." Already included in chapter 5.3. |

| 2.2.14 IBERDROLA | | | | |
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| No | Chapter / section | Comment | Include (Yes/No) | Explanation |
| 1. | General comment | In order to make a kind of “enforceable”, and consequently more reliable Plan, monitoring the implementation at the three levels of the three connected Plans (National, Regional, and European levels) will be a key element. Deviations in implementation from existing Plans should be justified and amended in the issuing of the next Plan. | Partly | NRA and Agency will monitor the plans. Moved to chapter 6.1: “A monitoring report is to be included in the Community-wide ten-year network development plan to identify any deviations in implementation from the previous ten-year network development plan. Any known reasons for such deviations should be also explained in the monitoring report. The monitoring report will provide an update on delays affecting any investment included in the previous plan. Furthermore, TSOs should provide reasons for not proceeding with delayed or cancelled investments.” |
| 2. | General comments | Development of the plan will be challenging both technical and the coordination ENTSO E will have to coordinate, at national levels, issues like objectives; criteria; outcomes; information provided; timing; etc and at the same time make sure the plan is a community plan. This will require clear criteria, confrontation of opinions; coordination of different sources, etc. | No | ERGEG agrees with the comments and the intention is that the advice as a whole ensures that these concerns are met. |
| 3. | Question 1 | We share the objective of building a European electricity market, and consequently, the objective of increasing cross-border trade. This increasing in cross-border trade will be accomplished by building new needed infrastructure, but there are also other actions to be taken to foster this trade. In particular, the objective of eliminating any restrictions to cross-border trading that cannot be justified should be included in the planning effort. | No | Cross-border trade is an important part of the document and prerequisite for the plan already. |

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| 4. | Question 1 | The scope of the TYNDP will have to take into account those national plans, not in detail, but at least it should analyze objectives, criteria, main outcomes; and not to deal only with cross-border infrastructures stemming from the plans. | Partly | <p>The national plans will be an important source of information in the planning process, but ENTSO E should not analyse all parts of the plans - but use it as an input.</p> <p>The plan will have to deal with all major infrastructure project of European importance, whether it is cross-border projects or large national project that will eliminate bottlenecks for a large region.</p> <p><u>Added to 6.6.3 “In particular this should include investment needs on upstream internal network, without which the efforts for integration of the European electricity market would result in limited gains. The project owner of identified projects should be included when available.</u></p> |
| 5. | Question 1 | In order to make a reliable plan, all regulatory (or other type of) barriers that could put at risk the implementation of the Plan, should be identify and passed on to the NRAs and the Agency to take the proper actions. | No | Outside the scope of the TYNDP advice. |
| 6. | Question 2 | The development of binding energy efficiency and energy saving programs; the introduction of big amounts of renewable and intermittent energy in the networks; will make the system to evolve to a different generation mix and a different utilization of plants from what we are used to. More capacity installed compared to the peak demand will be needed; flexibility in operation of the plants will have a bigger value than today; new forms and types of generation and storage will be developed; new management of the grids will be needed | No | These are important reflections for input in the scenario process regarding development of renewables. But nothing to change in the advice. |
| 7. | Question 3 | It has No sense to conclude that there will be enough generation capacity to meet the forecasted demand in a system if there is not a clear view that the corresponding investments will be carried out by some agents because the proper incentives are there. We have seen cases where the TSO makes an adequacy | N/A | An important issue but investment incentives are outside the scope of the document. |

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| | | statement under the assumption that somebody will install a certain capacity but knowing that it will not happen because there is No economic incentive to make it. | | |
| 8. | Question 3 | We fully agree with the idea that the TYNDP should include a coordinated European generation adequacy outlook and not a mere compilation of the national ones, but criteria to develop it will have to be clear since the basic information to elaborate it will necessarily come from national surveys. New wind farms (and also some other intermittent technologies) will represent a big proportion of the future energy mix. TSOs will have to explicitly consider the characteristics of these technologies when assessing the system adequacy, including how these new plants will get access to the networks. | No | Access to the network is not a part of the generation adequacy forecast. |
| 9. | Question 4 | Network reinforcements will have to pass technical and economic analysis to be included in the Plan, but we consider that the facilities, necessary to meet the 10% interconnection capacity target approved by the European Council, should be included as a minimum, and construction of these facilities should have priority and even be mandatory. · | No | The final investments are outside the scope of the plan. The TYNDP should include ALL interconnecting projects that are beneficial for the European system. |
| 10. | Question 4 | The economic analysis will be a difficult task since it will imply to decide if a solution is appropriate or not, and it will be based on a number of considerations difficult to evaluate and to incorporate into the economic evaluation. In particular transparency is a must here, because issues such as security of supply; contribution to political targets such as Internal Market and Renewables penetration; consideration of generation costs in order to make a optimization exercise, and many others, will be crucial to promote a particular facility. The Agency, in collaboration with the NRAs will be responsible for the supervision of the assumptions and the transparency of the analysis. | No | ERGEG agrees but this should already be covered in the document. |

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| 11. | Question 5 | The Regulatory opinion set out in the document considers all criteria that should be taken in the analysis. Nevertheless, we must insist that the non-binding characteristic of the Plans should require a more careful look from ACER and the National Regulators, in aspects related to: regulation in force in each country; economic incentives for building the facilities; authorization processes; justifications for not implementing existing Plans. | N/A | The advice focuses on the community plan. The fact that national plans often are non-binding has to be elaborated at some other stage. |
| 12. | Q5 | Plans developed at the national level will consider a number of requests from the agents (generators and distributors), but probably not all of them are accepted. Regulators should consider the criteria applied by TSOs to reject requests in order to ensure a non-discriminatory treatment all throughout Europe. | N/A | All stakeholders will have to contribute with information and sometimes project suggestions in the process but there will never be a guarantee that their view is included. The national plans are outside the scope of the advice on the community plan. |
| 13. | Question 5 | The possibility for the Agency to include recommendations to amend the national Plans will provide proper incentives to build coordinated national Plans that will ease the task to develop the Regional and the Community-wide Plans. | N/A | General comment |
| 14. | Question 6 | Coordination at the three levels requires sharing common criteria for evaluating planning decisions. In this sense, Regulators have to make sure that these criteria are well known, transparent, and it is applied at all three levels: national, regional, and Community-wide level. Compatibility would be ensured if national grid developments do not create congestions on new cross-border interconnectors. National Plans should consider expanding the network to be sure there is No bottleneck that could create barriers to cross-border trade. A country should not solve internal congestions limiting interconnectors capacity. | N/A | National plans are outside the scope. |
| 15. | Question 7 | The review from ACER is of great relevance, since it will be the guarantee of having a harmonized Plan, but the review from NRAs is also especially relevant since | N/A | Implementation of the plan is supervised but otherwise outside the scope. |

| | | there has No sense to develop Community-wide Plans and Community-wide system adequacy if national Plans are not implemented which in turn will make impossible to reach the European objectives. | | |
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| 16. | Question 7 | Two valuable tools that are included in the Electricity Regulation (EC 714/2009) at the same level of requirement for ENTSO-E as the TYNDP (article 8.2.d and c) are the annual work program and the annual report. These two elements can be solid basis for a close and continuous monitoring of the implementation of the Plans. The three levels of Plans (national, regional and Community-wide) should be subject to these controls so that any deviation from the Plans can be rapidly detected and amended. | N/A | See above |
| 2.2.15 GEODE "the European association representing the interest of energy distribution companies" | | | | |
| No | Chapter / section | Comment | Include (Yes/No) | Explanation |
| 1. | General comments | GEODE considers the content of the Plan proposed by ERGEG is adequate. Special attention should be given to the fact that the European energy system should be technologically adapted to manage larger amount of intermittent generation in order to meet the 20-20-20 mandate. | Partly | The scenarios will have to take into account the different possible future development. Political goals and agreements as the RES will be an important aspect in these processes. Added in 6.1: <ul style="list-style-type: none"> “Development of infrastructure for generation to be introduced to the European market and to provide for meeting demand (supplying consumption) <u>and goals for integration of renewable energy:</u>” |
| 2. | Question 1 | Stakeholders participation has to be guaranteed. In countries where there is more than one TSO, the national planning should start at DSO level. | N/A | National planning is outside the scope. |

| 3. | Question 1 | Regulators should harmonize the regulation of permissions and licensing for line expansion, construction and modifications. At the same time, environmental impact assessment process should be speed up. | N/A | Outside scope. |
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| 4. | Question 2 | Numerous DSO operate EHV lines, and some large cities (capital cities) are supplied including transport of high load. Therefore, the supply of many customers depends upon the connection of such DSO load centres. TSOs do not have any data for that, having a big influence on risk. Special regard to capital cities and load centres in Europe should be addressed in the draft advice to be considered in the Plan. | N/A | The advice does not deal specifically with the national plans, but again the DSOs are an important group which holds important information needed in the planning process and must therefore be included in the process at several levels. |
| 5. | Question 2 | DSO should be included as a stakeholder. | No | Already included. |
| 2.2.16 EWEA | | | | |
| No | Chapter / section | Comment | Include (Yes/No) | Explanation |
| 1. | General comment | Europe must use the coming decade to prepare for the large-scale exploitation of its largest indigenous resource, offshore wind power. For this to happen in the most economical way Europe's electricity grid needs major investments, with a newly built offshore grid and major grid reinforcements on land. | N/A | This is a comment for the planning process in ENTSO E. |
| 2. | Question 1 | The timing of the launch of this consultation is somewhat unfortunate as it conflicts with the launch of the first draft TYNDP on the 1st of March. It would be more helpful to assess the regulators' advice on the TYNDP after the publication date of the 1st of March in order to gain a better insight of the actual content of the first draft TYNDP, its achievements | N/A | General comment. |

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| | | and possible shortcomings. | | |
| 3. | Question 2 | The regulators advice should ensure that the TYNDP will be more than a mere compilation of national and regional development plans, rather it should perceivably aim at a Pan-European planning vision for grid infrastructure. | No | Already included. |
| 4. | Question 2 | The TYNDP should give a clear overview not only on investments planned by TSOs, but also take due account of future infrastructure investments planned by private consortia (e.g. the merchant transmission line between Norway and Germany, NorGer, due to be operational by 2015). | No | See chapter 2.2.9 no. 1 |
| 5. | Question 3 | Any European generation adequacy outlook and resulting network projects in Europe should factor in EU objective as the achievement of the 2020 RES targets must not be undermined by inadequate grid enhancements in the TYNDP. | N/A | General comment outside the scope. |
| 6. | Question 4 | EWEA urges the European Regulators to take a strong stand when it comes to assessing the socio-economic criteria on the evaluation of reinforcements. The bullet points on page 25 in the consultation document already point in the right direction: socio-economic criteria should comprise the value of a more integrated market, exchange of ancillary services and also potential socioeconomic value of the higher welfare for the end-customers within the European market. | No | Already included. |
| 7. | Question 4 | EWEA welcomes that the European regulators recognise the benefits of developing a truly European grid network which would lie not only in overcoming the present congestions on some of the main transmission lines, but would also provide for savings | N/A | General comments, outside the scope. |

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| | | in balancing and system operation costs and enabling a functioning internal market. It is clear that investment decisions on building new transmission lines have to be supported by proper feasibility studies proving the economic benefit and fulfilling all technical planning criteria. | | |
| 8. | Question 4 | A European approach towards an optimised European electricity system should be promoted with a strong top-down element in order to ensure that, as with any strategic investment at EU level, European priorities are properly reflected, namely the security of supply, market integration and connection of renewable energy technologies. These important socio-economic criteria should therefore be taken into consideration by the regulators when assessing transmission infrastructure projects in the TYNDP. | No | Intention already included. |
| 9. | Question 5 | On the basis of the assessments of the NRAs, the regulators as ERGEG/ACER should then amend the respective plans in case of inconsistencies. In general, the top-down approach of the Community-wide TYNDP should always be the guiding principle when national and regional plans are assessed. | No | Assessment of regional and national plan is outside the scope. This is right in principal but ACER is not the one giving advice to the national TSOs to amend their plans. This is part of NRAs duty and thus not covered in this advice. |

2.2.17 EON

| No | Chapter / section | Comment | Include (Yes/No) | Explanation |
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| 1. | General comments | The process, the methodology, the data and the results achieved are transparent and comprehensive to all stakeholders. However, we have doubts whether it is really justified to put such a lot of efforts into a lengthy process which is at the end of the day non-binding. | N/A | General comment. |

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| 2. | Question 1 | ACER should challenge ENTSO-E as well TSOs to propose and implement projects that contribute to market integration the most and the quickest. | N/A | This should be part of the evaluation of projects and is already included. |
| 3. | Question 1 | The consultation process should be simplified with only one additional consultation in which a Community-wide network development plan with national annexes is introduced. | No | The national plans are outside the scope and should be a separate process – not directly included in the community plan. |
| 4. | Question 1 | DSOs should be involved. | No | ERGEG agrees that the DSOs are important stakeholders in the process. This is already included. |
| 5. | Question 2 | The advice should include a clear, precise and joint understanding of planning criteria such as n-1 and dynamic rating and a clear indication | No | The technical criteria in chapter 6.5.1 should be further described by ENTSO-E in the TYNDP. |
| 6. | Question 2 | The advice should describe who is responsible if single projects of the previously adopted plan has not been implemented. We recommend to clearly black-board the relevant entity. | No | Annual report of NRA should consider implementation of projects. This is not a major part of the TYNDP. |
| 7. | Question 3 | In the generation adequacy forecast the conclusions should be drawn with the full awareness that the information for generation might change over a period of 10 years. Under No circumstances information received from generators in the framework of the adequacy report should be taken as binding. | No | Agree, the Outlook cannot be binding. ENTSO-E has to be aware that changes can occur when setting their criteria. |
| 8. | Question 4 | All scenarios used shall be compliant with the achievement of the 20/20/20 target. | No | All scenarios have to be relevant, consistent and believable. |
| 9. | Question 4 | In addition to the economic criteria stated, the changes in costs of ancillary services, ie redispatch, shall be taken into consideration as well. | No | Social economic analysis should include all relevant costs. This will be elaborated. |
| 10. | Question 4 | The existing bottlenecks within the regions and across the borders should be clearly shown in the 10-Year-Electricity-Network-Development-Plan including measures to overcome them. | Yes | See chapter 2.2.5 no. 5 |

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| 11. | Question 5 (section 7) | The criteria for regulatory opinion should include a thorough evaluation of the identified investment projects and ACER's statement whether they fulfil the objectives under section 2 of the consultation paper, respectively ENTSO-E's priorities as set forth by the consulted planning premises, scenarios etc. The evaluation of the plan should be done under a market integration perspective. | Yes | See chapter 2.2.4 no. 6 |
| 12. | Question 6 | The aspect of coherence and compatibility is first of all an issue of integrating the same priorities and assumption in all of the different planning tools. It is only possible to evaluate consistency whether an identified infrastructure shortfall in one market or between two markets will lead to an identified investment project in all of network development plans. | No | National plans will consider national priorities- the community plan focuses on the European level. |
| 13. | Question 7 | We also expect ACER to recommend to the European Commission any improvements that would overcome common reasons for inconsistencies for a more effective enhancement of Europe's electricity infrastructure. | N/A | Outside the scope. |

2.2.18 Energy Norway

| No | Chapter / section | Comment | Include (Yes/No) | Explanation |
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| 1. | Question 1 | Transparency of the national TSO planning and European processes and insight into the fundamental planning data is a precondition to ensure stakeholder involvement. | No | Already included. |
| 2. | Question 1 | To better understand future needs in the network the plans should include descriptions of how the transmission grids are currently used, revealing transmission network utilization and the occurrence | Yes | See chapter 2.2.5 no. 5 |

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| | | and magnitude of bottlenecks. | | |
| 3. | Question 1 | The criteria for selecting projects for publication should be stated and a shortlist of the selected investment projects considered both as a gross- and in the end a net-list with the remaining projects. | No | The gross list will be available through the national plans. In the community plan all relevant alternative should be included. |
| 4. | Question 1 | It is important to describe how the projects will be financed and add this as a criterion under section 2 in the draft. | No | Financing and ownership is not relevant for this analysis but may be included if available. |
| 5. | Question 2 (section 6.5.2) | All benefits and costs that are included in the investment calculation should be transparently described. The economic criteria listed under section 6.5.2 should also include how the different benefits are allocated. | No | Allocation of cost benefit is not part of the analyses. |
| 6. | Question 2 | To ensure transparency, ERGEG, should explicitly require ENTSO-E in an annex or similar, to include and publish the national considerations/analysis made by individual TSOs as input to the 10 year development plans. | No | The national plan will also be available and will be the basis but it is not necessary to have it as an appendix. |
| 7. | Question 2 | The integration of new renewable generation is a specific issue that needs to be addressed in the scenarios and that would benefit from a European perspective. | N/A | The advice just provides general requirements. Creating scenarios in detail is up to the TSOs. |
| 8. | Question 2 | Furthermore, the community wide TYNDP should include sensitivity analysis that reveals how the proposed investments are affected by different assumptions. | Partly | When applying different scenarios when evaluating different projects, this will ensure that important assumptions are investigated. Added to 6.6.3: <u>"This analysis should be driven in relation with corresponding scenarios and to that end should highlight, where appropriate, the sensitivity of the investments needs depending on the different scenarios"</u> . |

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| 9. | Question 3 | In most cases scenario planning are kept confidential by Generators for competitive reasons. Therefore, stakeholders should accommodate the data collection process by providing information on already decided and licensed projects as these are already publicly available but may be costly for the TSO to collect. | No | Confidential data has to be treated confidentially but TSOs have to get information anyway if someone claims grid connection. |
| 10. | Question 3 | ERGEG should define society's acceptable level of generation adequacy during peak load situations as a guide for the TSOs when fulfilling the task to ensure this desired level of generation adequacy. The TSOs should in their generation outlook present possible measures needed to secure the level of generation adequacy decided by ERGEG. | N/A | Out of the scope. |
| 11. | Question 3 | The plan should explicitly list the technical and policy means that will be used to meet extreme situations and the future need for balancing power within an area as these issues will be more critical in the future. | No | This goes beyond the scope of the generation adequacy outlook. |
| 12. | Question 3 | When evaluating generation adequacy a zero alternative should be included to address the uncertainty if decided and planned generation projects are not carried out. | No | The generation adequacy outlook has to consider realistic options. |
| 13. | Question 3 | The future generation adequacy should be evaluated based on the underlying grid (internal constraints/bottlenecks within control areas) and with regard to constraints on existing interconnections. | No | A prerequisite to make assumptions on generation adequacy is the connection of available power in the grid so it is inevitable to consider the underlying grid/possibility of grid connection. |
| 14. | Question 4 | Section 6.6.1 should be extended to also include transmission utilization and congestion within every TSO control area. The frequency of internal congestions should be shown statistically on a monthly basis as well as the procedure used to | No | Important, but this level of detail will perhaps be included in the national plan. |

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| | | alleviate the specific congestion, i.e. market splitting (price differences between price zones), counter trade, reductions of interconnection capacity or re dispatch. | | |
| 15. | Question 6 | We therefore strongly recommend ERGEG and the national regulators to strengthen the directive and regulation by requiring the TSO's to work out regular national plans also in member states with ownership unbundled TSOs. | N/A | Out of the scope of the advice. |
| 16. | Question 6 | Transmission capacity between every connected area should be presented in order to assess the current need for transmission reinforcements as well as the future development. Furthermore, the plans should comprise a reference to the current situation i.e. load, generation and generation mix within defined geographical areas. | Yes | See chapter 2.2.5 no. 5 |
| 17. | Question 7 | It is important that the regulators ensure transparency regarding congestions and that they are managed efficiently where they physically appear, exposing the locations within the current network where future reinforcements are needed. | N/A | General comment on the content. |
| 18. | Question 7 | To assist implementation of the TYNDP, investment projects that have been identified as a European priority could benefit from common European authorization procedures to guarantee a speedy execution. | N/A | Not task of the advice. |

| 2.2.19 Energie Baden-Württemberg AG | | | | |
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| No | Chapter / section | Comment | Include (Yes/No) | Explanation |
| 1. | General comments | The document should clearly describe the cost recovery for TSOs in an extra chapter. | No | Cost recovery and cost sharing are outside the scope of the advice. |
| 2. | Question 1 | The development plan must notably show how the needs for grid use are matched with the solutions of investment. | No | Already included. |
| 3. | Question 1 5.2 | Concerning the description of the planning process, and for a better understanding, it should be better to split figure 2 in two separated parts: the first for the submission of the national plan; the second for the submission of the Community-wide and regional plans. Moreover, it should be relevant to detail the process between TSO and NRA in regards to the national development plan. | No | The advice just relates to the community-wide plan. Therefore national plans need to be provided to ENTSO. If and in what way the national plans are provided to the NRAs depends on the status of the TSO (ISO, ITO, OU) and is not part of this advice. |
| 4. | Question 2 | The content of the Community-wide network development plan is clearly structured. We do not identify additional topics for the plan. | N/A | General comment. |
| 5. | Question 3 | The European generation adequacy outlook should cover the overall adequacy of the electricity system to supply current and projected demands for electricity. If demand for electricity should be assessed with less uncertainty, it could be different for generation. | N/A | General comment. See also chapter 2.2.18 no 12, 13. This is part of the generation adequacy outlook and (more) the system adequacy forecast not the TYNDP. |
| 6. | Question 3 | Decisions for installation of new generation plants and/or decommissioning of old power plants depend on several factors (e.g. economic, social and environmental) and are confidential information. Therefore the impact of these uncertainties should be | Yes | The advice should state that uncertainties shall be clearly stated as far as possible in the TYNDP. Included in chapter 6.3 as additional bullet point: <ul style="list-style-type: none"> • <u>“Other project uncertainties”</u> |

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| | | indicated and assessed. | | |
| 7. | Question 4 | Concerning the existing and decided infrastructure (section 6.6.1), information can be given on transmission capacity and on additional transmission capacity decided to be built, but not on the rate of transmission capacity use on an annual (and monthly) basis for the previous 5 years. These data are not yet available and in order to obtain them TSOs need to conduct further studies. | No | ERGEG disagrees. These data should be made available. |
| 8. | Question 4 | Until now, the economic models used by TSOs are not so advanced. They do not take into account all the parts suggested in the document (e.g. risk analysis, synergies). Therefore it should be recognised that this would mean a significant effort to address these criteria for all the projects included in the report. | N/A | Work just started and all processes are not fully established now. |
| 9. | Question 5 | The national generation outlooks do not lie in the responsibility of the TSOs. This must be accounted for, when checking the consistency of national and European generation outlook. Coherence between the national development plan and the European “Ten-year Electricity Network Development Plan” must be checked by every NRA. | No | Independent from who is responsible for releasing the outlook and if NRAs have to check consistencies, this is also ACER’s duty as the community wide TYNDP will become binding and not all national plans do. |
| 10. | Question 7 | The Community-wide ten-year network development plan should be realized every two years. Each version should include a status review of the previous plan, as mentioned in section 6.1. Therefore, we wonder whether the rather complex proposed monitoring process is necessary. Rather we suggest that the status review should also include the issues indicated in section 9. | N/A | It is task of ACER, stemming from the regulation, to do a monitoring. |

| 2.2.20 Energy Networks Association (ENA) | | | | |
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| No | Chapter / section | Comment | Include (Yes/No) | Explanation |
| 1. | General comments | By developing this community wide plan in a non-discriminatory and transparent manner, and making use of consistent generation and demand scenarios, a network development plan can be prepared that should support changes in the generation profile across Europe. | N/A | General comment. |
| 2. | Question 1 | Particularly important from the distribution companies' perspective will be the interface between the networks in the context of demand side management. | Yes | DSO is mentioned in chapter 4.5. |
| 3. | Question 1 | The plan should describe the current status of the European networks, where bottlenecks are located, the amount of time that certain areas are congested, and the reasons for the congestion. | Yes | See chapter 2.2.5 no 5. |
| 4. | Question 1 | It should also map the current status of operations of the infrastructure to be developed. | Yes | See chapter 2.2.5 no 5. |
| | Question 1 | ACER and the National Regulatory Authorities should as far as possible build the competences and resources enabling the regulators to develop the right set of processes and criteria to properly evaluate ENTSO-E's proposals. | N/A | This goes beyond the content of the advice. |
| 5. | Question 1 | Regulatory barriers could put at risk the proper implementation of the plan. The right incentives framework will be needed if such essential investments are to be made in a timely fashion. | N/A | ENTSO needs to take those barriers into account but to remove them is not part of the advice. |
| 6. | Question 1 | We believe the outcomes from the Commission's seventh framework research program could provide useful inputs in this context. | N/A | General comment. |