

## ENTSO-E Annual Work Programme 2023 - Treatment of stakeholders' comments

This note contains a summary of remarks received during the public consultation organised from 05 July to 15 August 2022 and ENTSO-E views on those comments in relation to the Annual Work Programme (AWP) 2023 as submitted to ACER. For ACER's information, ENTSO-E organised a webinar on 27<sup>th</sup> July in the middle of Public Consultation.

Stakeholder	Do you think the Work Programme focuses on the right deliverables or should some be deleted or added	On the individual work items do you have any specific comments?	What items from the AWP should be prioritized in the case of a broader Russian issue causing disruptions/unintended consequences?	ENTSO-E views
<a href="#">Digital Engineering Ltd</a>	<p>The AWP 2023 neglects an important part of analysis: it does not reflect the physical impact Climate Change could have on the network operation.</p> <p>Climate Change will affect all levels of network elements (production, demand and transmission capacity). Importantly, the impacts will not be limited to harsher extreme events, but a New Normal will evolve which implies changes for network operation and layout. In order to build a robust and resilient network, the potential physical impacts should therefore be covered in R&amp;D (methodology for making CMIP6 Climate Change data useable for network operators), network development and robustness/resilience (both using the Climate Change scenario data in addition to historical data for analysis and network development).</p>	No answer	No answer	<p>Currently ENTSO-E is addressing the climate change challenges and impacts on the transmission network through the initiatives within the planned RD&amp;I Roadmap 2020-2030, ERAA, TYNDP and the Risk Preparedness Methodology:</p> <p><b>RD&amp;I Roadmap 2020-2030</b></p> <ul style="list-style-type: none"> <li>• Flagship 3 (Enhance grid use and development for pan EU market)</li> <li>• Flagship 4 (Enable large scale offshore wind energy into the grid).</li> </ul> <p>Topics like <b>Circular economy included in planning and asset management, SF6 free solutions, Development of HV components and sub-systems for extreme environmental conditions</b> will be further developed under those indicated flagships.</p> <p><b>ERAA and TYNDP studies</b></p> <p>A forward looking climate database which takes climatic time series for the power system from actual climate change adjusted meteorological models is under development and will be ready for use by 2024, and made available in the public domain. This is highlighted as a key requirement in the ERAA roadmap: <a href="#">Implementation Roadmap   European Resource Adequacy Assessment (ERAA) (entsoe.eu)</a>. This improved data handling will also be of benefit for more accurate long-term scenario and grid planning studies in TYNDP context.</p> <p><b>Risk Preparedness Methodology</b></p> <p>Additionally, within the Risk Preparedness Methodology, ENTSO-E has identified several scenarios related to climate like droughts and heatwaves. In 2023 ENTSO-E will update the Risk Preparedness methodology and launch the 2nd cycle of identifying regional scenarios.</p>

<p><a href="#">T&amp;D Europe</a></p>	<p>Yes</p>	<p>T&amp;D Europe welcomes the wider stakeholder engagement in the development of the TYNDP 2024 scenarios. With the TYNDP providing a benchmark for network development, we look forward to seeing improved forecasting on the future quantitative needs (n.b. products and services) to enable these scenarios. Moving forward towards the preparation of the TYNDP, and the building of long-term European energy scenarios, to succeed with the energy transition ENTSO-E should also take into account the impact on the T&amp;D industry and its expected contribution.. This means the TYNDP should go beyond the initial focus on the development of the physical infrastructure, such as additional lines, to focus on the needed functional network developments covering the entire system.</p> <p>We look forward to getting involved in the stakeholder engagement activities in the next following months and we are ready to engage in a constructive dialogue on specific areas. In addition, we welcome the continuous improvement of models and methodologies ENTSO-E is committed to.</p> <p>2. Cooperation on the T&amp;D interface (p.20) T&amp;D Europe supports the ongoing cooperation of ENTSO-E with the EU DSO Entity and distribution system operators, including exchange of best practices for network development at national level. In particular, we support the work items related to data interoperability, cyber resilience and the planning and operational issues, including forward-looking discussions on topics such as ENTSO-E Vision for a power system for a carbon neutral Europe.</p> <p>We urge ENTSO-E to prioritise developing</p>	<p>T&amp;D Europe believes the security of supply actions should take precedent in case of a broader Russian issue causing disruptions, including the need for anticipation and close coordination with key ENTSO-E stakeholders. Supply issues of other key critical inputs beyond gas for electricity generation should also be taken into account in the projections of ENTSO-E.</p> <p>For instance, ENTSO-E and ENTSO-G could monitor and assess whether European grids have acted as enablers or deterrents of European solidarity among Member States, to respond to shortages in energy supply at national level. Case studies could involve Central and East European countries which are highly dependent on Russia for gas, France currently importing electricity, or countries best positioned to replace gas-fired power plants.</p> <p>T&amp;D also welcomes further RDI activities including promotion of EU funded projects such as the READY4DC we are involved in. Accelerating such programmes will enable resilience against the foreseeable geopolitical changes including unintended consequences from the broader Russian issue.</p>	<p>The TYNDP's system needs study identifies need that may be addressed by very diverse solutions. The methodology does not look at what may be the best solution to address the needs. Solutions include non-infrastructure solutions (such as dynamic line rating), and infrastructure solutions that are not wire-based (for example storage). The T&amp;D industry is one among many sectors that will contribute to making Europe's future power system fit for purpose. Therefore, the TYNDP system needs study is not limited to development of physical infrastructure. Nor could it focus only on the 'needed functional development covering the entire system' as said in your comment, because possible actions to address system needs extend beyond network development.</p> <p>ENTSO-E and the EU DSO entity have developed a joint list of priorities for 2022 and 2023 in accordance with the Memorandum of Understanding they have signed in early 2022. These priorities cover a wide range of topics (operational, system development, market facilitation) and with different focus (e.g. technical exchange based on best practices or common regulatory developments).</p> <p>ENTSO-E has also engaged with the EU DSO entity on its Vision for a carbon neutral Europe for which the development of a sound Transmission &amp; Distribution Interface and strengthened cooperation between TSOs and DSOs are critical. The final Vision will be released in Q4 2022 and follow-up activities might be initiated including with the EU DSO entity.</p> <p>Specifically on the promotion of smart grids, ENTSO-E and the EU DSO entity are working on a joint declaration of intent to accelerate the deployment of a European Digital Grid. This declaration will be followed by technical deliverables which will further define relevant areas for actions. This work will build upon previous cooperation including but not only the report on smart grid indicators.</p> <p>ENTSO-E appreciates the strong collaboration established with the T&amp;D Europe and other Stakeholders who play the utmost importance in the developments of the cybersecurity in the pan-European arena. Operational Technology plays a crucial role and opens a door for the further discussions that will need to be addressed extensively. Cybersecurity is not a static arena, it is constantly evolving and growing.</p> <p>ENTSO-E welcomes T&amp;D support in developing multi-vendor HVDC systems. We do share the view, the development of RDI Programmes, in cooperation with all stakeholders, is an effective way for the to accelerate the implementation of ENTSO-E RDI Roadmap.</p>
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<p><a href="#">DTEK</a></p>	<p>ENTSO-E's work programme is based on legal mandates therefore it already covers all key deliverables, including on coordination with 3rd country TSOs. However, recent political and legislative initiatives should be taken into account. First, candidate status has been granted to Ukraine and Moldova by the Council of the EU on 24th June 2022. Second, the importance of commercial exchange of electricity with Ukraine was highlighted in the REPower EU Plan (23rd May) and in the European Commission Communication "Save gas for a safe winter" (20th July). Therefore, cooperation with these two countries and international cooperation in general could possibly be included as a dedicated chapter to the Work Programme.</p>	<p>In our understanding, there is a strong willingness of all parties involved to finalise the synchronisation of power systems of Ukraine and Moldova with the Continental European Network in shortest technically possible timeframe. This is why we believe that this fact could be considered in the wording of the respective sub-chapters of the Work Programme. First, a sub-chapter on Inter-Transmission System Operator Compensation (Chapter 2. Market) could include more definite wording on Ukraine's accession to the ITC mechanism (p.12). Second, in Chapter 3. System Development, the paragraph on selection of candidate projects for TYNDP 2024 could also refer to envisaged projects on strengthening interconnections with Ukraine (p.13). Third, Ukraine also could be featured more specifically in Chapter 6. Cooperation on the Transmission &amp; Distribution Interface (p.20) for the country to be engaged in cooperation and thematic workshops with the EU DSO Entity (operational issues and a vision for carbon neutral Europe).</p> <p>Based on article 31(9) of Directive (EU) 2019/944, we would also propose to consider adding a sub-chapter (to Chapter 6.) on TSO-DSO cooperation for the purpose of the effective participation of market participants connected to the grids of system operators in retail, wholesale and balancing markets. Synchronization of the Ukrainian power system with the Continental European Network could also open possibilities for new market participants on the distribution level (integration of renewable energy sources into the market). Therefore, it is crucial to elaborate proper bilateral TSO-DSO coordination (including the Ukrainian TSO and Ukrainian DSOs).</p>	<p>We would like to suggest to prioritize system development and cybersecurity. Better interconnection and opportunities of using available energy resources in Ukraine could help to reduce dependence on Russian gas and to counterbalance the sharp increase in prices for gas caused by Russia's uncompetitive hostile actions with gas supplies to the EU. As our experience shows, Russia increasingly uses cyberattacks and cyber threats to undermine security of operations of the Ukrainian power sector with potential to attack the power systems of Continental Europe as well. These are real threats and they need to be addressed.</p>	<p>ENTSO-E is closely facilitating and monitoring the cooperation with Ukrenergo and Moldelectrica, while supporting the emergency synchronization related tasks. In the Annual Work Plan the chapter "Coordination with 3rd country TSOs" contains the elements of this collaboration.</p> <p>About the Ukraine's accession to the ITC mechanism a decision has not been taken yet.</p> <p>Regarding your comment on Chapter 3 System Development and the selection of candidate projects for TYNDP 2024, let us clarify that candidate projects are proposed by their promoters. ENTSO-E itself is not proposing infrastructure projects, only project promoters can do that.</p> <p>If a project promoter, either a Transmission System Operator or a private company, wants to propose a project on Ukrainian-EU borders in TYNDP 2024 it is welcome to do so just like in past TYNDP editions (provided the application meets the TYNDP compliance criteria applicable to all candidate projects). Since its inception in 2010 the TYNDP welcomes transmission projects within ENTSO-E and on ENTSO-E's borders with third countries. These include the borders of Poland, Slovakia, Hungary and Romania with Ukraine. However, so far, no project on these borders has ever been proposed for assessment in the TYNDP.</p> <p>Ukrenergo and ENTSO-E have recently signed an Observer Membership Agreement. As first steps, Ukrenergo representatives are involved in a number of high priority activities which are necessary to maintain a safe operation of the Continental Europe synchronous area. These do not include TSO-DSO cooperation. Nonetheless, ENTSO-E will consider any request that Ukrenergo or the EU DSO entity might formulate in this respect.</p> <p>Ukraine and its main Stakeholders are in the hotspot of the current geopolitical discussions where cybersecurity has its permanent "seat". We have welcomed the collaboration with the Ukrenergo, thus, the work has already began.</p> <p>Cybersecurity is one of the top priorities for ENTSO-E and more work is foreseen in the upcoming future. Your comment only re-assures us that we are looking in the right direction.</p> <p>It is possible that projects are proposed in future. However, a study performed in 2021 concluded that "from the perspective of steady-state analyses, the synchronous connection of Ukraine and Moldova to the continental part of ENTSO-E is feasible even without any additional requests for reinforcements or the construction of new infrastructure".</p>
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