

## **ENTSO-E Annual Work Programme 2021 - Treatment of stakeholders' comments**

This note contains a summary of remarks received during the public consultation organised from 01 July to 14 August 2020 and indications on how they have been taken into consideration in the version of the Annual Work Programme 2021 as submitted to ACER.

Section	Stakeholder	Please provide your opinion to the content of the ENTSO-E's Annual Work Programme 2021 - Your opinion: Respondents' feedback	ENTSO-E views
General	P2 Analysis Ltd	All looks sensible. It probably should be an overarching question for all the work: what is the impact of current and future pandemics on any of the developments in the programme.	ENTSO-E has organised and prioritised its work to fulfil the legal mandates.
System Development – Grid Connection Network Codes	P2 Analysis Ltd	Connection Codes IGDs - there is now a wealth of experience in operating to the connection codes and ENTSO-e should take appropriate effort to ensure that that experience is collected and used in the updates.	ENTSO-E is updating certain IGDs with an intention to incorporate changes/additions/clarification following up the experience gained over the last years and during the implementation and discussions that took place in several occasions with stakeholders. The IGD review is a legal obligation and the revised drafts will also be publicly consulted to ensure that outcomes are improved. ENTSO-E sees it proper to revise IGDs or/and launch new ones when it supports the longer-term implementation of the connection codes.
Market - CACM	Montenegrin electricity market operator (COTEE)	Very good, comprehensive, but it needs more actions regarding development of electricity market in SEE region.	The AWP 2021 focuses on legally mandated tasks given to ENTSO-E by EU legislation or mandate by (regional) TSOs. Therefore, the developments of electricity markets is supported on a European level.
Research & Development	Ervia	Our views are confined to the R&D Roadmap and we are very supportive of the focus on Cross Sector Integration and Offshore Wind. We believe that as well as enabling large scale offshore electricity onto the grid, ENTSO-E should also explore the potential for the production of green hydrogen from excess renewable electricity that will be available at times. We believe that offshore wind development should be planned in parallel with green hydrogen production.	ENTSO-E appreciates Ervia's comments regarding the need to incorporate additional sectors in its TYNDP studies. ENTSO-E recognizes the need to broaden the scope of its planning activities to include more robust multi-sectorial analyses (e.g. P2X sector coupling, cost benefit analyses) and is considering how best to do so as part of its Multi-Sectorial Planning Support (MSPS).

General	EDF	<p>EDF welcomes this ENTSO-E insight on the works to be carried out in 2021, and would like to make the following comments to the ENTSO-E draft AWP2021:</p> <p>One general comment would be that the Work Programme should not only provide the list of topics to be addressed during the year to come but should also provide more information on the prioritization of works by the TSOs. This is of importance for market players.</p>	<p>The ENTSO-E AWP focuses on the legally mandated tasks given to ENTSO-E directly by EU regulation or through decisions taken by All Transmission System Operators (TSOs) or TSOs of a region mandating their tasks from the EU regulation to ENTSO-E. Reporting the prioritisation of TSOs' tasks is not under the scope of ENTSO-E's AWP.</p>
System Operation – Risk Preparedness	EDF	<p>Regarding system operation, and more precisely risk-preparedness: among the scenarios to be taken into account, EDF considers that ENTSO-E should retain one combining a very high RES generation and the islanding of some nuclear power plants. Indeed, RES generation cannot be curtailed in some contracts for demand and supply balance reasons.</p>	<p>The list of scenarios has already been agreed and the report is shortly finalised, so additional scenarios can't be included any longer. However, the next steps for countries now are to identify national crisis scenarios and develop &amp; adopt National Risk Preparedness Plans (Article 7 and 10 of the Regulation 2019/941). These workstreams could still include this specific scenario, on top of recent joint ENTSO-E scenarios.</p>
Market - CACM	EDF	<p>Regarding market rules, and more precisely market coupling: EDF would like to stress the need for ENTSO-E to enhance the work towards a flow-based capacity allocation in the ID timeframe, which would be all the more valuable with the introduction of ID pan-European auctions. NTC based allocation remains the rule for the moment.</p>	<p>In 2021, ENTSO-E together with TSOs will focus on 15 minutes and crossmatching for intraday. A focus on flow-based capacity allocation in Intraday will be set later.</p>
Market – CACM / Transparency Regulation	EDF	<p>Furthermore, there are regrettably no flow-based data on exchange capacity published for D-1. As a general requirement, transparency and publication should be improved.</p>	<p>Many thanks for highlighting. ENTSO-E will publish flow-based data on exchange capacity for D-1 as soon as possible, however new flow-based parameter are still under clarification with the relevant TSOs.</p>

<p>Transparency Regulation / System Operation – Common Grid Model</p>	<p>EDF</p>	<p>As a general requirement, transparency and publication should be improved. This is also the case for the Common Grid Model. On this Common Grid Model, EDF urges ENTSO-E to dedicate enough resources so that the project does not experience further delays, since it is, as emphasized by ENTSO-E, “a prerequisite for several services harmonised in the Network Codes, including coordinated capacity calculation, operational security analysis, outage planning coordination and adequacy analysis”, which are very important for market players.</p>	<p>The full implementation of the Common Grid Model (CGM) Build Process and Operational Planning Data Environment (OPDE), enabling harmonized service provisions (e.g. Capacity Calculation), is of crucial importance for ENTSO-E. The delivery of the Common Grid Model (CGM) Build Process and Operational Planning Data Environment (OPDE) is monitored and controlled closely. The timeline, as presented in the June 2020 System Operations European Stakeholder Committee, for the upcoming releases appear feasible, hence the scheduled milestones are according to plan. A status report is provided in each System Operations European Stakeholder Committee. Questions can be addressed there.</p>
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<p>System development - adequacy</p>	<p>EDF</p>	<p>Regarding system development and considering more precisely adequacy assessment: ENTSO-E should further enhance the consistency between the TYNDP and ERAA underlying scenarios, as well as the CBA consistency when assessing network and alternative flexibility solutions. Furthermore, the TYNDP being important for Projects of common interest (PCIs), it is sometimes very/too optimistic on the commissioning of projects (considering permitting issues), and the exercise requires therefore more reality checks (with for example the publication of several commissioning dates taking into account major potential problems). More generally, ENTSO-E should keep on improving the quality and self-supporting structure of the CIM/CGMES datasets made available when publishing the TYNDP (for example: precise location - i.e. geographical coordinates - of network elements and if not confidential of non-distributed generation facilities, true commissioning dates or at least better distinction between projects close to commissioning and those still under construction, better categorize generation units and not put all kinds of generation altogether in a single category). Furthermore, ENTSO-E should extend their analysis by extending the CIM/CGMES datasets to the new scenarios (National Trends, Distributed Energy, Global Ambition), time horizon (2030, 2040), time points (winter peak, summer peak, inter-season, ...). Regarding ERAA, EDF considers that the development of a sound methodology for the economic viability check should be among ENTSO-E's priorities.</p>	<p>ENTSO-E appreciates the feedback provided by EDF and will give due consideration to the recommendations provided in future study work performed to meet its legal obligations. ENTSO-E is actively working towards continuous improvement in its approaches to scenario-building and cost-benefit analyses, and in its reviews of project proposals, through meaningful lessons-learned exercises following each study cycle. As noted, there have been steps forward in providing additional transparency on the network models datasets. We will consider how to expand the content and availability of these datasets subject to confidentiality and cybersecurity restrictions. And finally, as noted in the draft AWP, a key component of the 2021 ERAA workplan is the piloting of the economic viability check.</p>
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<p>Transparency Regulation</p>	<p>EDF</p>	<p>Regarding transparency, EDF welcomes the evolutions foreseen for the Transparency Platform. It is important that the published data is easily accessible (through APIs) and, especially as regards the data related to balancing, that the publication is dynamic enough. It would also be useful that the Transparency Platform incorporates information which is currently published elsewhere (e.g. on the JAO website) so that all transparency data is centralized and available at a unique location.</p>	<p>An API is provided by ENTSO-E for most of the data on the Transparency Platform. Balancing data is also available via the API except for PDF documents and data relating to Art. 12.3.b&amp;c.</p> <p>Dynamic publication for Balancing data is foreseen as required by the Electricity Balancing Guideline (Art. 12.3). The publication deadline for several data items is 30 minutes after the end of the respective minute. Currently ENTSO-E, is assessing to develop the Transparency Platform further to provide information even closer to real time.</p> <p>ENTSO-E is interested in providing easy access for stakeholders to relevant data and thanks for the proposal to centrally publish relevant data on the Transparency Platform. This however depends on several market and institutional actors and may not be realised easily.</p>
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<p>System Development - TYNDP</p>	<p>Climate Action Network (CAN) Europe</p>	<p>"CAN Europe's submission focuses on the work strands that are currently covered by CAN Europe, namely the system development under the Ten Year Network Development Plan (TYNDP) and transparency issues.</p> <p>We are in a climate emergency. Swift emission reductions are indispensable to limit temperature rise to 1.5°C, in line with the Paris Agreement. The EU is currently discussing an increase of the level of ambition of its climate target. European energy infrastructure urgently needs to be prepared for a massive increase of renewable energy generation besides the mobilisation of energy savings potentials. ENTSO-E's annual work programme for 2021 thus should make a Paris Agreement compatible energy infrastructure planning a priority. The draft work programme however does not refer to this challenge.</p> <p>CAN Europe also misses a clear commitment to increasing the variation of TYNDP scenarios. While we welcome ENTSO-E's willingness to include a carbon budget into the modelling, we are very concerned about the current set of scenarios. These scenarios do not suggest realistic pathways to reach the Paris Agreement's 1.5°C target. They are neither in line with the promises of the European Green Deal nor with a timely achievement of net zero emissions. In 2021, ENTSO-E should assess a 100% renewable energy pathway towards net zero emissions in 2040 as a part of its scenario building (see also CAN Europe submission to the consultation on the TYNDP scenarios, January 2020, and the CAN Europe and EEB letter on TYNDP scenarios, February 2020).</p> <p>We fully agree that a multi sectoral planning is necessary. A cross-sectoral optimisation of supply, demand and all</p>	<p>ENTSO-E appreciates CAN Europe's input into its 2021 Annual Work Plan. These comments will be considered as it develops the 2022 TYNDP scenarios and continues to enhance the CBA processes with support and engagement of all its stakeholders. Note that the draft AWP has been edited to reflect ENTSO-E's commitment to prioritize compatibility with the Paris Agreement in its TYNDP work program and to consider well how to develop and integrate a sustainability metric in its CBA assessments.</p>
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Transparency Regulation	Climate Action Network (CAN) Europe	<p>CAN Europe supports ENTSO-E's efforts to improve access to data as well as the planned further improvements of its Transparency Platform. We suggest that ENTSO-E generally makes the attribution of an open licence to all its publications a priority in its annual work programme 2021.</p>	<p>Many thanks for acknowledging our efforts. The licence attributed to the data elements depends on the data owners. Details to on the licence for the different data elements can be found in the Transparency Platform's terms and conditions.</p>