



GUIDELINES FOR PROJECT INCLUSION (GPI) – TYNDP 2024

CONSULTATION REPORT

1. Introduction and legal basis

This report details the main inputs received during the consultation of the draft *Guidelines for Project Inclusion for the TYNDP 2024* (hereafter “GPI”) and how they were considered for the establishment of the final GPI. The legal basis of this process is defined in Annex III.2(5) of the *Regulation (EU) 2022/869 of the European Parliament and of the Council of 30 May 2022 on guidelines for trans-European energy infrastructure, amending Regulations (EC) No 715/2009, (EU) 2019/942 and (EU) 2019/943 and Directives 2009/73/EC and (EU) 2019/944, and repealing Regulation (EU) No 347/2013* (hereafter “TEN-E Regulation”):

“By 30 June 2022 and subsequently for every Union-wide ten-year network development plan, the ENTSO for Electricity and ENTSO for Gas shall issue updated guidelines for inclusion of projects in their respective Union-wide ten-year network development plan, as referred to in points (3) and (4), in order to ensure equal treatment and the transparency of the process. For all the projects on the Union list in force at the time, the guidelines shall establish a simplified process of inclusion in the Union-wide ten-year network development plans taking into account the documentation and data already submitted during the previous Union-wide ten-year network development plan processes, provided that the documentation and data already submitted remains valid.

The ENTSO for Electricity and ENTSO for Gas shall consult the Commission and the Agency about their respective draft guidelines for inclusion of projects in the Union-wide ten-year network development plans and take due account of the Commission's and the Agency's recommendations before the publication of the final guidelines.”

As required, ENTSOG consulted the draft GPI with the *European Commission* (hereafter “EC”) and with the *Agency for the Cooperation of Energy Regulators* (hereafter “ACER”). Voluntarily, ENTSOG also consulted the draft GPI publicly. To this end, ENTSOG organised two dedicated, public stakeholder webinars on 12 September and 19 September 2023¹. Feedback was requested from stakeholders during a consultation period between 12 September and 29 September 2023 via an online form. This consultation report is a voluntary document of ENTSOG to provide transparency on received inputs and to justify the way the inputs were considered for the establishment of the final GPI.

¹ Link to stakeholder webinars website: <https://www.entsog.eu/entsog-webinars-presentation-draft-guidelines-project-inclusion-gpi-tyndp-2024#welcome>

2. Inputs to the consultation

2.1. Informal feedback received from ACER

All informal ACER feedback was considered and most of the recommendations have been implemented. ENTSOG only decided to not implement the feedback if the non-inclusion was considered justified.

1. General considerations	1. Seek further consistency with ENTSOG-E project inclusion guidelines.	1. Final GPI includes improvements in terms of consistency with ENTSOG-E's inclusion guidelines.
	2. Identify competing and exclude the unrealistic and non-progressing ones.	2. The technical criteria for natural gas projects were modified to exclude certain projects that showed no progress. All project promoters can indicate competition. However, the main identification process of competing projects is performed at a later stage.
	3. Quantify future capacity needs through the infrastructure gaps report.	3. This comment is not considered relevant for this GPI.
	4. Apply mechanisms to implement a reality check regarding project costs and implementations phases.	4. A reviewing role for ENTSOG has been defined concerning project timelines and costs;
	5. Display and associate any natural gas capacity reduction due to repurposing/retrofitting of existing infrastructures to hydrogen or to CO ₂ .	5. Technical criteria were adapted to consider natural gas capacity reduction due to repurposing/retrofitting.
	6. ENTSOG should improve the readability of the document, especially for new project promoters who might not be very familiar with the TYNDP.	6. Considered.
2. PS-CBA assessment	1. Perform a PS-CBA only for H2 infrastructure categories (and natural gas projects where relevant) as prescribed in Annex II(3) of TEN-E.	Final GPI clarifies that project-specific Cost-Benefit Analysis (hereafter "PS-CBA") in the context of the TYNDP only be performed for H2 projects ² indicating intention to apply for PCI or PMI status. This is considered in line with the legal requirements.
	2. Perform PS-CBA for all H2 infrastructure projects submitted to TYNDP 2024.	

² Falling under H2 category as defined in Annex II(3) of the TEN-E Regulation.

3. Information and clarity	1. Update the TYNDP planning timeline and include the NRAs data-check.	1. The draft TYNDP project list will be shared with EC and ACER at the end of the project collection phase.
	2. Adjust the technical and administrative criteria for different type of project promoters./	2. Table 2 of the GPI was adapted (Requested information from project promoters to fulfil the mandatory administrative criteria in TYNDP 2024).
	3. Aim for the same level of transparency for all submitted projects while including the aggregated CAPEX for each project.	3. Considered. Technical criteria for all subcategories were adapted to request the same level of information and transparency.
	3. Describe the process for validating or rejecting a project and publish in detail the results that led to the relevant decision.	4. Implemented.
4. Project categories and sub-categories	1. TYNDP 2024 should aim to include only natural gas projects addressing an apparent infrastructure gap or need.	1. The TYNDP is where the natural gas system is assessed. Excluding a project from such assessment would be preventing its analysis. The findings of a previous TYNDP only have limited value as to identifying up to date "apparent infrastructure gaps", since the overall infrastructure as well as the scenarios are evolving.
	2. Under natural gas project category, a sub-category concerning "decommissioning" should also be included.	2. The technical criteria for natural gas projects were adapted to allow submissions of the decommissioning.
	3. Any production-related project (with exception for electrolyzers) should not be collected in TYNDP 2024.	3. The hydrogen production projects from natural gas (H2P) sub-category was deleted.
	4. Ideally, reverse flow capacities should be always included in the topology and modelled, with the information collected from all TSOs through a dedicated "internal" project collection, while the information would be contained in input/assumptions of the TYNDP.	4. Existing reverse flow capacities will be collected through an internal data collection process. However, reverse flow projects will be collected through the TYNDP project collection.
	5. "CO2 projects" should be limited only to repurposed natural gas infrastructures.	5. Considered. GPI includes one CO2 sub-category. Only CO2 transport and/or projects from repurposed NG existing infrastructure will fulfil technical criteria of this subcategory.
	6. Distinguish between H2 mobility in transport projects in the H2M sub-category and TEN-T projects.	6. Considered. Technical criteria adapted for H2M subcategory.

	7. The “other” project category should be removed to avoid confusion.	7. Considered but not implemented to allow submission of energy transition projects and projects not included in other sub-categories. It is clarified that “other” projects will not influence the TYNDP modelling and assessment.
5. Administrative criteria	1. The GPI should clearly state that UC projects will be automatically considered “less-advanced”.	1. Implemented in GPI section 5 (Project maturity status in the TYNDP).
	2. Concerning the pass-fail administrative criteria for UC projects: 2.1. Technical expertise requirements might not be fulfilled; 2.2. ENTSO-E considers companies with less than 1 year of existence submit as UC.	2.1. This will be analysed based on the project specific information; 2.2. Administrative criteria uniform for all projects (including UC) based on EC feedback.
	3. Whenever a project does not meet the criteria listed from 4 to 11 and is not yet known if it's included in the NDP, the project promoter should acquire a non-binding consent from the relevant NRA(s) indicating no objection.	3. Implemented in GPI section 3.2.
	4. Concerning the administrative criteria 8 (Market Test), the GPI should clarify that to meet this criterion the project should have at least concluded the non-binding Expression of Interest (Eoi) phase and have received positive interest.	4. Definition of Market Test administrative criterion was adapted.
	5. Concerning the administrative criteria 9 (“(Pre-) Feasibility study (all)”), the GPI should clarify that this criterion is applicable only to UC projects as it is not (always) an indication of project maturity.	5. Definition of Pre-feasibility administrative criterion was adapted.
6. Technical criteria	1. The relations with other project(s) (i.e. enabler, enhancer or competing) should be provided for all categories and not only for natural gas transmission and hydrogen transmission projects.	1. Technical criteria adapted for all project categories.
	2. It is not clear why only promoters of hydrogen transmission projects are requested to provide information on the source of hydrogen production while the source of injected/imported natural gas is not requested for natural gas infrastructures. 3. GPI should also further explain what the reason is for collecting such information.	2. Included supply information of natural gas infrastructure as part of the technical criteria.

³ ACER also notices that in TYNDP 2022 Annex A ([LINK](#)) the information on the sourcing country was collected and published.

7. Cross-border infrastructure	1. ACER recommends distinguishing between cross-border infrastructure projects and internal infrastructure projects. Capacity values should be provided also for internal projects and should be reflected in the TYNDP topology.	1. This is possible. Based on the project submissions, a complex country-internal topology can be reflected in the TYNDP topology. This could include hydrogen valleys that are not connected to any cross-border hydrogen grid.
	2. Try to tackle any inconsistencies that might occur with ENTSO-E's draft CBAM, e.g., "ENTSO-E current draft CBA guidelines allow in fact for projects enabling offshore wind capacity to go beyond the capacity defined at scenarios level when PINT approach is applied".	2. Clarification added in section 6 that in some instances, values going above scenario values might be required for PS-CBAs.

2.2. Input from public consultation

Q6: In your view, is it relevant to aggregate project subcategories according to the different energy carriers (Natural gas, renewable gases and hydrogen)?

Organization	Answer	ENTSO-G's reply
EmmEn Marketing Consultants	No	-
astora GmbH	Yes	-
Edison	Yes	-

Q7: Regarding HYDROGEN subcategories as detailed in section 3.1.2.

In your view, do the different hydrogen subcategories (H2T, H2L, H2S, H2X, H2M, H2E and H2P) cover all relevant hydrogen infrastructures

Organization	Answer	ENTSO-G's reply
EmmEn Marketing Consultants	Yes	-
astora GmbH	No	-
Edison	No	-

Q8: Regarding SMART GAS GRID subcategories as detailed in section 3.1.3. In your view, do the different SGG subcategories (RET, BIO and SYN) cover all relevant smart gas grid infrastructure projects?

Organization	Answer	ENTSOG's reply
EmmEn Marketing Consultants	Yes	-
astora GmbH	Yes	-
Edison	Yes	-

Q9: In case you have replied No to any of the above questions (i.e. Q7, Q8 or Q9), please specify

Organization	Answer	ENTSOG's reply
EmmEn Marketing Consultants	-	-
astora GmbH	Q3: Are ammonia crackers included in the sub-category H2L?	Yes, H2L sub-category includes ammonia crackers as stated in a footnote
Edison	The guidelines indicate that H2X projects will be excluded from PCI or PMI list. However, it is currently unclear how H2 terminals who might have both import and export facilities in the same structure will be classified. This particular case should be taken into account and clearly regulated, so that H2L facilities do not incur in the risk of being excluded from potential PCI/PMI inclusion.	Final GPI TYNDP 2024 guidelines include hydrogen export terminals located within the geographical perimeter of the TYNDP that are coupled projects with hydrogen reception facilities. Information regarding these projects will be collected as part of the H2L import terminal submission. It was clarified by the EC during the consultation that H2 export terminals are not considered as being eligible for PCI status.

Q10: Do you have any additional remarks related to the project categories and/or subcategories

Organization	Answer	ENTSOG's reply
EmmEn Marketing Consultants	-	-

astora GmbH	-	-
Edison	-	-

Q11: Do you find that the administrative criteria for promoters and projects as described in section 3.2 ensure equal treatment to project promoters and promoter transparency of the TYNDP process?

Organization	Answer	ENTSO's reply
EmmEn Marketing Consultants	Yes	-
astora GmbH	Yes	-
Edison	Yes	-

Q12: In case you have replied No to Question 11, please specify

Organization	Answer	ENTSO's reply
EmmEn Marketing Consultants	-	-
astora GmbH	-	-
Edison	-	-

Q13: Do you have any additional remarks related to the administrative criteria?

Organization	Answer	ENTSO's reply
EmmEn Marketing Consultants	No	-
astora GmbH	-	-
Edison	-	-

Q14: Do you find that the technical criteria for projects as described in section 3.3 ensures that the project promoters provide all necessary information for a proper and fair assessment of projects in the context of TYNDP/PS-CBA?

Organization	Answer	ENTSO-G's reply
EmmEn Marketing Consultants	Yes	-
astora GmbH	Yes	-
Edison	Yes	-

Q15: In case you have replied No to Question 14, please specify

Organization	Answer	ENTSO-G's reply
EmmEn Marketing Consultants	-	-
astora GmbH	-	-
Edison	-	-

Q16: Do you have any additional remarks related to the technical criteria?

Organization	Answer	ENTSO-G's reply
EmmEn Marketing Consultants	No	-
astora GmbH	Concerning technical criteria 3 for H2S category, it is worth to mention that compressor power can be quantified after taking some decision gates (i.e. after completing basic engineering at a first glance). Therefore, it would be useful to leave aside this very specific point.	Technical criteria for H2S sub-category was updated considering stakeholder feedback in the final GPI.
Edison	-	-

Q17: Do you find clear and transparent the data handling and promoter access to the assessment as detailed in section 4. of the document?

Organization	Answer	ENTSOG's reply
EmmEn Marketing Consultants	Yes	-
astora GmbH	Yes	-
Edison	No	-

Q18: In case you have replied No to Question 17, please specify

Organization	Answer	ENTSOG's reply
EmmEn Marketing Consultants	-	-
astora GmbH	-	-
Edison	When requesting a correction of the project data, or in case the information provided is deemed to be incorrect, ENTSOG's request should be sent to the project promoter well in advance of the end date for corrections. Moreover, the time window given to correct the data should have a reasonable duration, so that an adequate amount of time is provided to correct or complete the missing information, as projects to be include in the TYNDP are quite complex and correcting data, while essential for the purpose of the TYNDP, is a time consuming process that involves multiple subjects.	In order to ensure that the promoters have sufficient time to correct and/or complete their submissions, ENTSOG has committed in the final GPI to communicate corrections to promoters no later than two weeks prior the closing of the project validation phase.

Q19: Do you have any additional remarks related to the section 4. Data handling and access to the assessment?

Organization	Answer	ENTSOG's reply
EmmEn Marketing Consultants	No	-
astora GmbH	-	-
Edison	-	-

Q20: In your view, does project status as defined in section 5. allow to fairly categorize projects according to its maturity status?

Organization	Answer	ENTSOOG's reply
EmmEn Marketing Consultants	Yes	-
astora GmbH	Yes	-
Edison	Yes	-

Q21: In case you have replied No to Question 20, please specify

Organization	Answer	ENTSOOG's reply
EmmEn Marketing Consultants	-	-
astora GmbH	-	-
Edison	-	-

Q22: Do you have any additional remarks related to the section 5. Project status in TYNDP ?

Organization	Answer	ENTSOOG's reply
EmmEn Marketing Consultants	No	-
astora GmbH	Regarding classification of projects in category "Advanced" there is the need to commissioning the project by year of TYNDP + 6 years. In case of H2S, longer retrofitting or new built periods will show up. Thus, I recommend to adjust this timeline for the type of the project and allow projects with longer timeline to be considered as well.	Definition of advanced projects is applied to define the advanced hydrogen infrastructure level. Therefore, it should consider projects with a higher level of advancement. ENTSOOG will perform PS-CBA assessments to all hydrogen projects for which the promoter indicates an intention to apply to the next PCI/PMI process, independently from its maturity or level of development.
Edison	-	-

Q23: Do you have any additional remarks related to the section 6. Common guidelines for projects relevant for joint ENTSOG/ENTSO-E assessment?

Organization	Answer	ENTSO's reply
EmmEn Marketing Consultants	No	-
astora GmbH	-	-
Edison	-	-

2.3. Input from the EC

ENTSO received comments from the EC in the draft GPI document. Most comments were of editorial nature and were accepted by ENTSOG. The main requests of the EC were the following.

- To change the order of the categories to put TEN-E categories first.
- To collect hydrogen production projects from natural gas only indirectly via the hydrogen transmission projects.
- To split the H2L category to have H2 export terminals as own sub-category.
- To introduce a review of ENTSOG of submitted timelines and costs.
- To exclude projects that remained "under consideration" for a certain time.
- To request more (detailed) information from project promoters, especially on technical parameters and costs.
- To make sure that after the finalisation of the first PCI/PMI Union list under the revised TEN-E Regulation, all such PCIs and PMIs are part of the TYNDP.
- To make it impossible to submit a natural gas project that claims to also be a repurposing project at a later point in time.
- To remove special treatment of companies in existence for less than one year in the administrative criteria.
- To state which projects can have an impact on TYNDP modelling and assessment and which sub-categories fall under ENTSOG's responsibility to produce PS-CBAs.

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Cover picture Courtesy of Teréga



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