European Commission

Law

Feedback from: ENTSOG - European Network of Transmission System Operators for Gas

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'ENTSOG appreciates the opportunity to provide early feedback on the forthcoming Electrification Action Plan. Below we react directly to the assertions in the call for evidence. We recognise the need for further electrification to reach net-zero, as outlined in our joint scenario work with ENTSO-E. However, molecules play a key role for flexibility, stability and affordability. The assumption that renewable electricity generation is inherently cheaper than other

alternatives is questionable. System costs associated with intermittency are not fully accounted for in the call for evidence. Such costs may significantly alter the overall cost figures, as stated in the Draghi report: Policy decisions should [] not solely be based on the levelized cost of electricity (LCOE) associated with each project or technology [] Cost comparisons for policy decisions should as such be on the basis of the equivalent firm power, promoting a balanced and resilient energy ecosystem while minimising overall system costs. Furthermore, energy molecules are also subject to taxation, network costs, and other charges not only electricity. Hydrogen conversion could avoid negative prices and bridge the supply-demand time gap caused by intermittent RES-E supply. The claim that a reduction in gross energy consumption will automatically translate into economic efficiency is not accurate. This could conflict with the objectives of the Clean Industrial Deal, via de-industrialisation or energy poverty. The assertion that electrification reduces dependence on geopolitical factors is contradictory. The EU lacks sufficient rare earth and uranium reserves, and a significant share of renewable energy technologies is produced outside the EU. The opportunities for establishing extended value chains in the EU for required electrification technologies seem overly optimistic. Electrification alone does not imply greater energy security. In addition, a relevant part of energy demand cannot switch to electricity for technological and economic reasons. Energy infrastructure is essential, regardless of the energy carrier. Project permitting should be accelerated to facilitate the matching of production and consumption. The Heating and Cooling Strategy and the Electrification Action Plan should be consistently framed in a real energy system integration perspective, recognising the essential and complementary roles of both electrons and molecules. Industrial sectors and households should decide autonomously whether to switch from energy molecules to electricity. Furthermore, existing gas infrastructure can be decarbonised by repurposing to hydrogen, or by increasing biomethane flows. This approach could offer significant savings compared to building entirely new electricity infrastructure.

Insisting on electrification despite the availability of cheaper and decarbonised alternatives raises questions about economic efficiency. The Renewable Energy Directive prescribes a 42.5% share of renewable energy in gross final energy consumption by 2030. This target does not specifically refer to electrification, and Member States have the flexibility to decide how to achieve it. The KPI for the share of electricity in final energy consumption is not enshrined in EU legislation and should not be considered a binding target. Electrification is not the only tool available to decarbonise. CO2 emissions can be captured and stored, resulting in (near-)zero emissions. The Clean Industrial Deal prioritises competitiveness, including through such technologies. Affordability, and not only energy efficiency, should be considered as a key element of decarbonisation policy. Large capacity energy storage through molecules is essential to avoid curtailments of intermittent renewables. Pumped hydro has limited growth potential in Europe, and batteries are not suitable for long-term storage.'