TYNDP 2026 public consultation on guidance documents for

Infrastructure Gaps Identification, System Assessment and Project-specific Cost-Benefit Analysis

9 March – 10 April

Disclosure: answers to the consultation will be disclosed on behalf of the represented organisation.

Identification

1. Your first and last name
   [free text]

2. Your email address
   [free text]

3. Name of the organisation you represent
   [free text]

4. How would you describe the type of organisation you represent?

   Drop-down list:
   - European institution
   - Member State
   - National regulatory authority
   - Market actor – demand-response operator
   - Market actor – end-user
   - Market actor – energy efficiency solutions
   - Market actor – independent aggregator
   - Market actor – network user

Market actor – project promoter
Market actor – trader

Associations – CCUS
Associations – electricity sector
Associations – energy consumers
Associations – EU DSO entity
Associations – gas sector
Associations – heating and cooling sector
Associations – hydrogen sector
Civil society

Other [free text]

General information

5. What TYNDP deliverables do you use in practice?
    a. Scenarios Report
    b. List of TYNDP projects (Annex A)
    c. Infrastructure report
    d. Maps
    e. Hydrogen Infrastructure Gaps Identification report
    f. System Assessment report
    g. Project Fiches
    h. Other [free text]

6. Do you have any suggestion on how to improve the readability of the documents? [free text]

Annex D1 - Implementation Guidelines (IG) for project-specific cost-benefit analyses of hydrogen projects

The document aims to provide TYNDP 2026 cycle-specific guidance on the elements of relevance for the project-specific cost-benefit analysis (PS-CBA). These complement the Cost-Benefit Assessment Methodology, which applies across cycles.
The results of the PS-CBA will be published in form of project fiches.

7. Are the explanations and illustrations in the draft TYNDP 2026 Implementation Guidelines **clear and exhaustive**?
    a. Yes
    b. Other [free text]

8. Do you consider **the ranges defined by the "base" and "stressful" weather scenarios** as sufficient to capture the range of climatic uncertainty relevant to long-term infrastructure planning?

    Context: A key innovation in the 2026 Scenario is the use of three representative weather scenarios that were defined by a modelling process that combines historical datasets with future climate projections from the Coupled Model Intercomparison Project (CMIP6) framework. Using as basis the representative weather scenarios defined in the Scenario process, for TYNDP 2026 IGI and PS-CBA, ENTSOG proposes a set of ranges that are defined by a "base" and a "stressful" weather scenario (section 2.5 of Annex D1).

    a. Yes
    b. Other [free text]

9. The methodology covers the two **planning horizons most relevant for PS-CBA: 2035 and 2040**. Do you consider the choice of target years as appropriate and relevant?
    a. Yes
    b. Other [free text]

10. Do you support the consideration of GHG and non-GHG **emissions savings stemming from the reduction of energy curtailment** (i.e., the reduction of hydrogen

and electricity curtailed demand) for PS-CBA indicators B1 and B2, respectively described in sections 3.2.3 and 3.2.4 of TYNDP 2026 Annex D1?

Context: unsatisfied hydrogen demand could often be interpreted as a certain amount of hydrogen users that will fail to switch to the hydrogen sector, and therefore, be forced to use an alternative fuel. (e.g., natural gas, oil, coal or others). For this reason, disregarding the impact of projects on the reduction of hydrogen curtailment might lead to the underestimation of GHG/ non-GHG emissions savings.

a. Yes
b. Other [free text]

11. Which assumption should be applied to the **GHG and non-GHG emission factors (EF)** applicable to **hydrogen demand curtailment** (Annex III and IV of TYNDP 2026 Annex D1) ?

If other, please **specify EF value(s), source and reasoning**.

a. Assume natural gas emission factors
b. Assume coal emission factors
c. Other [free text]

12. Which assumption should be applied to the **GHG and non-GHG emission factors (EF)** applicable to **electricity demand curtailment** (Annex III and IV of TYNDP 2026 Annex D1)?

If other, please **specify EF value(s), source and reasoning**.

a. Assume natural gas emission factors
b. Assume coal emission factors
c. Other [free text]

13. Do you consider the European Investment Bank values for the **societal cost of carbon** appropriate for the calculation of the ***GHG emissions variations indicator*** **(B1)** in the TYNDP 2026 PS-CBA as proposed in the draft TYNDP 2026 Implementation Guidelines?

a. Yes
b. No preference
a. Other [free text]

14. Do you agree that the ***non-GHG emissions variations indicator*** **(B2) should be monetised?** If yes, do you support the usage of the European Environment Agency values for the VOLY cost or the VSL cost to be used for the monetisation? If not, which alternative value(s) do you propose and why? (please specify the source)

    Note: VOLY - Value of Life Year; VSL - Value of Statistical Life

    a. VOLY
    b. VSL
    c. No preference
    d. Other [free text]

15. Do you support that the ***increase of market rents indicator*** **(B4)** covers both the electricity sector and the hydrogen sector in the TYNDP 2026 PS-CBA and is thereby aligned with the approach taken by ENTSO-E for the PS-CBA of electricity projects?

    a. Yes
    b. No preference
    c. Other [free text]

16. When calculating **benefit indicator B4** (i.e., ***increase of market rents***), do you support the consideration of cost of hydrogen disruption equal to WTP_{H2}?

    Note: WTPH2 - Willingness to Pay for Hydrogen

    a. Yes
    b. No (If no, please specify)

17. Which **willingness to pay (WTP)** values do you propose to be assumed **for hydrogen**? Please provide a source of information or another form of justification for the proposed values.

    Note: the WTP values should be higher than the most expensive supply source.

    [free text]

18. Do you support to use the **market assumptions** listed in the draft TYNDP 2026 Implementation Guidelines (section 2.7 of Annex D1, for the DHEM)?
    a. Yes
    b. Other [free text]

19. Do you support that the ***reduction in exposure to curtailed hydrogen demand indicator* (B5)** is calculated based on the **stressful weather scenario**? If you disagree, please specify an alternative approach.
    a. Yes
    b. Other [free text]

20. Do you consider the list of **benefit indicators** in the draft TYNDP 2026 Implementation Guidelines as **complete and satisfactory?**
    a. Yes
    b. Other [free text]

21. Do you have **any other remarks** on the draft TYNDP 2026 Implementation Guidelines?
    Note: additional information to include, any other elements to change, etc.
    a. No
    b. Other [free text]

Annex D2 - Hydrogen Infrastructure Gaps Identification methodology (IGI)

The document aims to provide detailed guidance relevant elements for the hydrogen infrastructure gaps identification, for the 2026 assessment cycle. The results of the hydrogen IGI will be published as a self-standing report.

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22. The methodology covers three **planning horizons**: 2030, 2035 and 2040. Do you consider this choice of target years appropriate and relevant? Or do you see as more relevant the alternative horizon expanding the long term until 2050 (i.e., 2035, 2040, 2050)?
    a. 2030, 2035 and 2040
    b. 2035, 2040 and 2050
    c. Other [free text]

23. Do you support the definition of the ***hydrogen market clearing price spread indicator* (IGI indicator 1)** as well as the concept and values of its thresholds in the draft TYNDP 2026 IGI methodology?
    a. Yes
    b. No opinion
    c. Other [free text]

24. Do you support the definition of the ***curtailed hydrogen demand indicator* (IGI indicator 2)** as well as the concept and values of its threshold draft TYNDP 2026 IGI methodology?
    a. Yes
    b. No opinion
    c. Other [free text]

25. Do you support the inclusion of the **proposed sensitivity regarding unlimited** infrastructure and/or supply as described in section 6.2 of Annex D2? If not, please provide reasons.
    a. Yes
    b. Other [free text]

26. Do you support the consideration of different **weather scenarios** as valuable to the IGI exercise? (If not, please provide reasons.)
    a. Yes
    b. No (free text)

27. Are the explanations in the draft TYNDP 2026 IGI methodology **clear and exhaustive**?
    a. Yes
    b. Other [free text]

28. Do you have **any other remarks** on the TYNDP 2026 IGI methodology?
    Note: additional information to include, any other elements to change, etc.
    a. No
    b. Other [free text]

Annex D3 - Hydrogen and Natural Gas System Assessment methodology

The document aims to provide detailed guidance on complementing components of TYNDP 2026, as: system adequacy, biomethane development and repurposing, among others. The results of the corresponding simulations will be published as part of a System Assessment report.

29. Are there any assumptions in the draft TYNDP 2026 System Assessment methodology that you would propose to change?
    a. No
    b. Other [free text]

30. Which **natural gas infrastructure level** do you support to be used in the Dual Gas Model (DGM) for the TYNDP 2026 natural gas system assessment?
    a. "Low" natural gas infrastructure level
    b. "Advanced" natural gas infrastructure level
    c. Both

31. Do you find the selected time horizons (2030, 2035, 2040) and the infrastructure commissioning assumptions appropriate for assessing the **impact of repurposing** on the European gas system? If not, please explain what changes or additional assumptions you would recommend.

    Context: the introduction of repurposing-related indicators is one of the major updates to the TYNDP 2026, based on a recently-published *report on repurposing criteria*. These indicators assess potential changes in the natural gas infrastructure dependencies and natural gas infrastructure diversification.

    a. Yes
    b. Other [free text]

32. In your view, do the **LICD and MASD indicators** sufficiently capture the main risks and opportunities related to natural gas supply diversification and dependence in the context of **infrastructure repurposing**? If not, what improvements or complementary indicators would you propose?

    Context: the introduction of repurposing-related indicators is one of the major updates to the TYNDP 2026, based on a recently-published *report on repurposing criteria*. These indicators assess

potential changes in the natural gas infrastructure dependencies and natural gas infrastructure diversification.

Note: LICD - LNG and Interconnection Capacity Diversification; MASD - Minimum Annual Supply Dependence

a. Yes
b. Other [free text]

33. Do you have **any other remarks** on the TYNDP 2026 Hydrogen and Natural Gas System Assessment methodology?

Note: additional information to include, any other elements to change, etc.

a. No
b. Other [free text]

Thank you for filling-in this questionnaire. Your responses will help us finalise the methodological documents for system and project-level assessments for the TYNDP 2026.