

0. IDENTIFICATION & GENERAL INFORMATION

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| Q1 What is your organisation? | | |
| Q2 How would you describe your organisation? (Please choose the category which best represents your organisation) | Response | Other (please specify) |
| Q3 Confidentiality: ENTSG intends to publish the results of this public consultation. ENTSG will disclose only the organisation name but not the participant's personal information (i.e. name and email address). If your response should remain completely confidential, please indicate it below. Otherwise simply skip the following question. | Response | My response should only be disclosed anonymously |
| | Please indicate why : | As I am working in the Sector, disclosing the name may lead to confuse the reply as one coming from an organisation (which is not the case) |
| Q4 Do you have a former experience in reading ENTSG and/or ENTSG-E TYNDPs? | ENTSG TYNDP 2015 and/or TYNDP 2017 ENTSG-E TYNDP 2016 None | ENTSG TYNDP 2015 and/or TYNDP 2017 ENTSG-E TYNDP 2016 |
| Q5 Do you have a former experience in reading ENTSG and/or ENTSG-E CBA methodologies? | Response | Yes |
| Q6 Did you participate in the ENTSG TYNDP 2017 Stakeholder engagement process? | Response | No |
| Q7 Did you participate in the ENTSG Stakeholder engagement process for the current CBA methodology? | Response | Yes |
| Q8 Do you have experience with the Project of Common Interest (PCI) selection process by the European Commission? | Yes, with the ongoing 3rd PCI selection process Yes, with the 2nd or the 1st PCI selection process No | Yes, with the ongoing 3rd PCI selection process Yes, with the 2nd or the 1st PCI selection process |
| Q9 Why is the ENTSG CBA methodology valuable for you? | Open-Ended Response | In the future, it will be helpful to understand the value of Investments and to promote national CBA methodologies for the same purpose. |

1. SIMPLIFICATION

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| Q10 Do you have further proposals for simplification of the CBA methodology document (please elaborate)? | Response | Yes |
| | Please elaborate your answer below: | Streamline it as much as possible, following ENTSG-E CBA Methodology table of contents. |
| Q11 Do you agree that the approach of using the TYNDP assessment of infrastructure needs which is performed for each new TYNDP edition to set the frame for the Project-specific assessment would ensure a focused and pragmatic approach (please elaborate) | Response | No |
| | Please elaborate your answer below: | The TYNDP assessment of infrastructure needs should be based on the existing network (in order to identify gaps). The CBA assessment of projects should be based on the "advanced network" |
| Q12 Would you see some indicators as having limited additional value for CBA analysis? Which ones and for which reason (please elaborate) | Response | Yes |
| | Please elaborate your answer below: | All those which are not monetised. All those listed in Annex IV of TEN-E Regulation, which is not for purpose. |
| Q13 Would you agree on the relevance of the ADVANCED infrastructure level (please elaborate)? | Response | Yes |
| | Please elaborate your answer below: | It should be the single reference network to be used in the TYNDP process. Its definition could be further elaborated to avoid including non-robust / non-advanced projects. |
| Q14 Do you agree with the proposal that the updated CBA methodology should discard the HIGH infrastructure level (please elaborate) | Response | Yes |
| | Please elaborate your answer below: | Of course, because it is completely useless and leads to confusion and waste of resources |
| Q15 Do you think the CBA methodology should keep considering the PCI infrastructure level for the TYNDP assessment (please elaborate) | Response | No |
| | Please elaborate your answer below: | It leads to confusion and waste of resources. PCI are both well advanced projects and very early projects (which is correct, as these projects may be in need of grants for studies). Including all of them would distort the analysis. |

2. A CBA METHODOLOGY WITH AN INCREASED FOCUS ON PROJECT-SPECIFIC CBA

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| Q16 Do you support that CBA methodology would include guidance on project grouping (please elaborate)? | Response | Yes |
| | Please elaborate your answer below: | See ENTSG-E methodology on clustering. However, it may be too early to define very precise rules, which may be further improved from TYNDP to TYNDP. |
| Q17 Would you have any view on criteria to be retained for grouping (please elaborate)? | Response | Yes |
| | Please elaborate your answer below: | The best starting point would be to "de-group" as much as possible. Because there are more risks in excessive grouping (leading to potential inclusion of unnecessary Investment items) than in the opposite option. |
| Q18 Do you support the proposal of a Project Fiche template (in terms of content, please refer to the version for the project fiche as defined for the 3rd PCI selection process and available at the following link https://www.entsog.eu/public/uploads/files/publications/CBA/2017/ENTSG_G_Project_Fiche_Template.pdf (please elaborate)? | Response | Yes |
| | Please elaborate your answer below: | Yes, but it should be as simple as possible and focus on costs and monetised benefits (see electricity TYNDP fiche) |
| Q19 Based on the example provided, is there any additional information the project fiche should cover (please elaborate)? | Response | Yes |
| | Please elaborate your answer below: | CAPEX, OPEX, benefit European social welfare, benefit security of supply (normal + extreme conditions), benefit gasification new areas, benefit fuel substitution in power generation |
| Q20 Do you support that application of CBA to TYNDP covers performance of PS-CBA (please elaborate)? | Response | Yes |

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| | Please elaborate your answer below: | Obviously. Otherwise, the TYNDP would be not "based on a CBA" as the Regulation requires. |
| Q21 Do you agree with the publication of PS-CBA results and relevant project information in the TYNDP through a Project Fiche (please elaborate)? | Response | Yes |
| | Please elaborate your answer below: | It is requested in Article 18 of the TEN-E Regulation for PCIs. The same transparency should apply to the TYNDPs. |
| Q22 Do you agree that the Project Fiche scope identified by ENTSOG should have PS-CBA results published (only for projects confirming their previous application for the PCI label as described at page 11 of the supporting document) (please elaborate)? | Response | Yes |
| | Please elaborate your answer below: | Partly agree. It should have PS-CBA results published for all ENTSOG TYNDP projects. |
| Q23 Do you have any comments on the PS-CBA elements proposed for publication as part of TYNDP (please elaborate)? | Response | Yes |
| | Please elaborate your answer below: | See previous answer on the content of the project fiche |
| 3. A CBA BUILDING ON COMPLEMENTARY MONETISED AND QUANTIFIED BENEFITS | | |
| Q24 Do you agree that the ESW CBA methodology should maintain a Multi-Criteria Analysis (MCA) approach where the monetary analysis is complemented by non-monetary and qualitative assessment (please elaborate)? | Response | No |
| | Please elaborate your answer below: | No, it should be only multi-benefit (i.e. multi monetised benefits) |
| Q25 What are your views on the current European-wide approach for security of supply (SoS) monetisation followed by ENTSOG (please elaborate)? | Response | No |
| | Please elaborate your answer below: | The current approach should be improved and build mostly on stated preference methods (WTP, WTA) |
| Q26 Would you see benefits in considering a more "country/consumer-based" approach instead of the above mentioned European-wide approach, and if yes, please precise how (please elaborate)? | Response | Yes |
| | Please elaborate your answer below: | Of course, per country. |
| Q27 Is there any data source that ENTSOG could consider using for Value of Lost Load (VoLL) and security of supply (SoS) monetisation in the updated CBA methodology and if yes, which ones (please elaborate)? | Response | Yes |
| | Please elaborate your answer below: | First, ENTSOG should list in a CBA annex the existing figures available for VoLL from various sources (TSO, NRAs, Ministries) per country, to provide a starting set of information. |
| Q28 Do you agree with ENTSOG's view that a specific monetisation of CO2 emissions should be done when the capacity brought by projects can be clearly linked to an increase in gas consumption and a consequent reduction of CO2 emissions (please elaborate)? | Response | Yes |
| | Please elaborate your answer below: | Yes, but it is not a priority due to limited relevance. Further, this benefit should be included in the fuel substitution benefit. Only CO2 tons should be separately provided (for information) |
| Q29 Would you have any suggestion on how to better measure CO2 reductions in mature markets in relation to existing and/or new infrastructure (please elaborate)? | Response | Yes |
| | Please elaborate your answer below: | Gasification of new areas: direct calculations via worksheets Fuel substitution in power generation: via an electricity market model (see ENTSO-E CBA) |
| Q30 Do you support monetisation of CO2 reduction to be based on a Social Cost of Carbon (SCC) rather than on the CO2 market prices (please elaborate)? | Response | No |
| | Please elaborate your answer below: | The CO2 monetisation should be done separately for CO2 price (Baseline value) and for SCC-CO2 price (extra-social value). See latest updates of ENTSO-E CBA methodology. |
| Q31 [If YES in the above question] Would you recommend any specific information source on Social Cost of Carbon (SCC) (please elaborate)? | Response | No |
| | Please elaborate your answer below: | It is up to ENTSOG and ENTSOE to jointly present a list of info and suggestions (many are available) in the scenarios TYNDP 2018 and to consult them. |
| Q32 Would you have any specific suggestion on a methodology or proxy for the monetisation of the supply source diversification assessment (please elaborate)? | Response | Yes |
| | Please elaborate your answer below: | As it may be too complex, simply discard it from the analysis of benefits. |
| Q33 Is there any other element or CBA indicator for which you would have monetisation suggestions (please elaborate)? | Response | No |
| | Please elaborate your answer below: | Already mentioned in previous answer. See VoLL and fuel substitution. |
| Q34 Do you have any specific view regarding whether and how market modelling is relevant in the framework of infrastructure assessment (please elaborate)? | Response | Yes |
| | Please elaborate your answer below: | It is important, but it should be completed by a true (separate) network modelling. |
| Q35 Could you indicate any source for input data required for the implementation of a market model (such as tariffs, supply prices, etc.) (please elaborate)? | Response | No |
| | Please elaborate your answer below: | Tariffs could be out. Supply prices are not a matter of market modeling, but a matter of scenarios. |
| Q36 Would you have any specific views regarding information sources for import prices for the various supply sources and regarding the minimum volumes used to assess market behaviour (please elaborate)? | Response | No |
| | Please elaborate your answer below: | Needs discussion in the scenario layer, not in CBA |
| Q37 How do you think that import price spread configuration could be further improved (please elaborate)? | Response | No |
| | Please elaborate your answer below: | |

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| Q38 Consistently with your reply to question 35, what should be the information source for the different supply source prices (please elaborate)? | Response | No |
| Please elaborate your answer below: | | |
| Q39 How do you think that LNG diversification could be further improved (please elaborate)? | Response | No |
| Please elaborate your answer below: | | By removing it. |
| 4. CBA FOR INVESTMENT REQUEST AND CBCA | | |
| Q40 Do you agree that CBA methodology as proposed would support promoters by providing them with a common input framework to be used (e.g. demand scenarios) and outputs indicating detailed benefits at country-level as input to promoters' own project-specific CBAs (please elaborate)? | Response | No |
| Please elaborate your answer below: | | There is no CBA methodology proposed for consultation ... |
| Q41 Do you have any additional comment or suggestion that has not been covered in previous questions (please elaborate)? | Response | Yes |
| Please elaborate your answer below: | | CBA should cover cost dimension too (CAPEX, OPEX). See ENTSO-E CBA methodology and ACER Recommendation on CBCA (CBA annexes) |

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| | Please indicate why : | |
| Q4 Do you have a former experience in reading ENTSG and/or ENTSG-E TYNDPs? | ENTSG TYNDP 2015 and/or TYNDP 2017 ENTSG-E TYNDP 2016 None | |
| Q5 Do you have a former experience in reading ENTSG and/or ENTSG-E CBA methodologies? | Response | |
| Q6 Did you participate in the ENTSG TYNDP 2017 Stakeholder engagement process? | Response | |
| Q7 Did you participate in the ENTSG Stakeholder engagement process for the current CBA methodology? | Response | |
| Q8 Do you have experience with the Project of Common Interest (PCI) selection process by the European Commission? | Yes, with the ongoing 3rd PCI selection process Yes, with the 2nd or the 1st PCI selection process No | |
| Q9 Why is the ENTSG CBA methodology valuable for you? | Open-Ended Response | |
| 1. SIMPLIFICATION | | |
| Q10 Do you have further proposals for simplification of the CBA methodology document (please elaborate)? | Response | |
| | Please elaborate your answer below: | |
| Q11 Do you agree that the approach of using the TYNDP assessment of infrastructure needs which is performed for each new TYNDP edition to set the frame for the Project-specific assessment would ensure a focused and pragmatic approach (please elaborate) | Response | |
| | Please elaborate your answer below: | |
| Q12 Would you see some indicators as having limited additional value for CBA analysis? Which ones and for which reason (please elaborate) | Response | |
| | Please elaborate your answer below: | |
| Q13 Would you agree on the relevance of the ADVANCED infrastructure level (please elaborate)? | Response | |
| | Please elaborate your answer below: | |
| Q14 Do you agree with the proposal that the updated CBA methodology should discard the HIGH infrastructure level (please elaborate) | Response | |
| | Please elaborate your answer below: | |
| Q15 Do you think the CBA methodology should keep considering the PCI infrastructure level for the TYNDP assessment (please elaborate) | Response | |
| | Please elaborate your answer below: | |
| 2. A CBA METHODOLOGY WITH AN INCREASED FOCUS ON PROJECT-SPECIFIC CBA | | |
| Q16 Do you support that CBA methodology would include guidance on project grouping (please elaborate)? | Response | |
| | Please elaborate your answer below: | |
| Q17 Would you have any view on criteria to be retained for grouping (please elaborate)? | Response | |
| | Please elaborate your answer below: | |
| Q18 Do you support the proposal of a Project Fiche template (in terms of content, please refer to the version for the project fiche as defined for the 3rd PCI selection process and available at the following link https://www.entsog.eu/public/uploads/files/publications/CBA/2017/ENTSG_G_Project_Fiche_Template.pdf (please elaborate)? | Response | |
| | Please elaborate your answer below: | |
| Q19 Based on the example provided, is there any additional information the project fiche should cover (please elaborate)? | Response | |
| | Please elaborate your answer below: | |
| Q20 Do you support that application of CBA to TYNDP covers performance of PS-CBA (please elaborate)? | Response | |
| | Please elaborate your answer below: | |
| Q21 Do you agree with the publication of PS-CBA results and relevant project information in the TYNDP through a Project Fiche (please elaborate)? | Response | |
| | Please elaborate your answer below: | |
| Q22 Do you agree that the Project Fiche scope identified by ENTSG should have PS-CBA results published (only for projects confirming their previous application for the PCI label as described at page 11 of the supporting document) (please elaborate)? | Response | |
| | Please elaborate your answer below: | |
| Q23 Do you have any comments on the PS-CBA elements proposed for publication as part of TYNDP (please elaborate)? | Response | |
| | Please elaborate your answer below: | |
| 3. A CBA BUILDING ON COMPLEMENTARY MONETISED AND QUANTIFIED BENEFITS | | |
| Q24 Do you agree that the ESW CBA methodology should maintain a Multi-Criteria Analysis (MCA) approach where the monetary analysis is complemented by non-monetary and qualitative assessment (please elaborate)? | Response | |
| | Please elaborate your answer below: | |

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| <p>Q25 What are your views on the current European-wide approach for security of supply (SoS) monetisation followed by ENTSOG (please elaborate)?</p> | <p>Response</p> <p>Please elaborate your answer below:</p> | |
| <p>Q26 Would you see benefits in considering a more "country/consumer-based" approach instead of the above mentioned European-wide approach, and if yes, please precise how (please elaborate)?</p> | <p>Response</p> <p>Please elaborate your answer below:</p> | |
| <p>Q27 Is there any data source that ENTSOG could consider using for Value of Lost Load (VoLL) and security of supply (SoS) monetisation in the updated CBA methodology and if yes, which ones (please elaborate)?</p> | <p>Response</p> <p>Please elaborate your answer below:</p> | |
| <p>Q28 Do you agree with ENTSOG's view that a specific monetisation of CO2 emissions should be done when the capacity brought by projects can be clearly linked to an increase in gas consumption and a consequent reduction of CO2 emissions (please elaborate)?</p> | <p>Response</p> <p>Please elaborate your answer below:</p> | |
| <p>Q29 Would you have any suggestion on how to better measure CO2 reductions in mature markets in relation to existing and/or new infrastructure (please elaborate)?</p> | <p>Response</p> <p>Please elaborate your answer below:</p> | |
| <p>Q30 Do you support monetisation of CO2 reduction to be based on a Social Cost of Carbon (SCC) rather than on the CO2 market prices (please elaborate)?</p> | <p>Response</p> <p>Please elaborate your answer below:</p> | |
| <p>Q31 [If YES in the above question] Would you recommend any specific information source on Social Cost of Carbon (SCC) (please elaborate)?</p> | <p>Response</p> <p>Please elaborate your answer below:</p> | |
| <p>Q32 Would you have any specific suggestion on a methodology or proxy for the monetisation of the supply source diversification assessment (please elaborate)?</p> | <p>Response</p> <p>Please elaborate your answer below:</p> | |
| <p>Q33 Is there any other element or CBA indicator for which you would have monetisation suggestions (please elaborate)?</p> | <p>Response</p> <p>Please elaborate your answer below:</p> | |
| <p>Q34 Do you have any specific view regarding whether and how market modelling is relevant in the framework of infrastructure assessment (please elaborate)?</p> | <p>Response</p> <p>Please elaborate your answer below:</p> | |
| <p>Q35 Could you indicate any source for input data required for the implementation of a market model (such as tariffs, supply prices, etc.) (please elaborate)?</p> | <p>Response</p> <p>Please elaborate your answer below:</p> | |
| <p>Q36 Would you have any specific views regarding information sources for import prices for the various supply sources and regarding the minimum volumes used to assess market behaviour (please elaborate)?</p> | <p>Response</p> <p>Please elaborate your answer below:</p> | |
| <p>Q37 How do you think that import price spread configuration could be further improved (please elaborate)?</p> | <p>Response</p> <p>Please elaborate your answer below:</p> | |
| <p>Q38 Consistently with your reply to question 35, what should be the information source for the different supply source prices (please elaborate)?</p> | <p>Response</p> <p>Please elaborate your answer below:</p> | |
| <p>Q39 How do you think that LNG diversification could be further improved (please elaborate)?</p> | <p>Response</p> <p>Please elaborate your answer below:</p> | |
| <p>4. CBA FOR INVESTMENT REQUEST AND CBCA</p> | | |
| <p>Q40 Do you agree that CBA methodology as proposed would support promoters by providing them with a common input framework to be used (e.g. demand scenarios) and outputs indicating detailed benefits at country-level as input to promoters' own project-specific CBAs (please elaborate)?</p> | <p>Response</p> <p>Please elaborate your answer below:</p> | |
| <p>Q41 Do you have any additional comment or suggestion that has not been covered in previous questions (please elaborate)?</p> | <p>Response</p> <p>Please elaborate your answer below:</p> | |

| 0. IDENTIFICATION & GENERAL INFORMATION | | |
|--|---|--|
| Q1 What is your organisation? | | Food & Water Europe |
| Q2 How would you describe your organisation? (Please choose the category which best represents your organisation) | Response | Other (please specify) |
| Q3 Confidentiality: ENTSGO intends to publish the results of this public consultation. ENTSGO will disclose only the organisation name but not the participant's personal information (i.e. name and email address). If your response should remain completely confidential, please indicate it below. Otherwise simply skip the following question. | Response | |
| | Please indicate why : | |
| Q4 Do you have a former experience in reading ENTSGO and/or ENTSGO-E TYNDPs? | ENTSGO TYNDP 2015 and/or TYNDP 2017 ENTSGO-E TYNDP 2016 None | None |
| Q5 Do you have a former experience in reading ENTSGO and/or ENTSGO-E CBA methodologies? | Response | No |
| Q6 Did you participate in the ENTSGO TYNDP 2017 Stakeholder engagement process? | Response | No |
| Q7 Did you participate in the ENTSGO Stakeholder engagement process for the current CBA methodology? | Response | No |
| Q8 Do you have experience with the Project of Common Interest (PCI) selection process by the European Commission? | Yes, with the ongoing 3rd PCI selection process Yes, with the 2nd or the 1st PCI selection process No | Yes, with the ongoing 3rd PCI selection process |
| Q9 Why is the ENTSGO CBA methodology valuable for you? | Open-Ended Response | As an environmental organisation we are concerned about the development of new gas infrastructure, which we believe is not conducive to reducing greenhouse gas emissions in order to fight climate change. |
| 1. SIMPLIFICATION | | |
| Q10 Do you have further proposals for simplification of the CBA methodology document (please elaborate)? | Response Please elaborate your answer below: | |
| Q11 Do you agree that the approach of using the TYNDP assessment of infrastructure needs which is performed for each new TYNDP edition to set the frame for the Project-specific assessment would ensure a focused and pragmatic approach (please elaborate) | Response Please elaborate your answer below: | No The current approach is not holistic, as there is a need for taking into account non-infrastructure solutions that would reach the same aim. There is moreover no proper accounting for externalities such as adequately addressing the environmental and climate impact of gas extraction which is in clear connection with gas infrastructure being built. There is certainly room for improvement before reaching a genuinely "pragmatic" approach. |
| Q12 Would you see some indicators as having limited additional value for CBA analysis? Which ones and for which reason (please elaborate) | Response Please elaborate your answer below: | |
| Q13 Would you agree on the relevance of the ADVANCED infrastructure level (please elaborate)? | Response Please elaborate your answer below: | |
| Q14 Do you agree with the proposal that the updated CBA methodology should discard the HIGH infrastructure level (please elaborate) | Response Please elaborate your answer below: | |
| Q15 Do you think the CBA methodology should keep considering the PCI infrastructure level for the TYNDP assessment (please elaborate) | Response Please elaborate your answer below: | |
| 2. A CBA METHODOLOGY WITH AN INCREASED FOCUS ON PROJECT-SPECIFIC CBA | | |
| Q16 Do you support that CBA methodology would include guidance on project grouping (please elaborate)? | Response Please elaborate your answer below: | Yes Project grouping should comprehensively reflect the cross border impact of project groups as well as interdependency e.g. concerning gas flows. Large, and possible overlapping, project groupings ensure that the cumulative impact of projects becomes more visible and facilitates that redundant projects are better identifiable. However, even excellent grouping can not make up for a lack of a general holistic approach which takes into account non-infrastructure solutions and existing non-gas energy infrastructure. |
| Q17 Would you have any view on criteria to be retained for grouping (please elaborate)? | Response Please elaborate your answer below: | |
| Q18 Do you support the proposal of a Project Fiche template (in terms of content, please refer to the version for the project fiche as defined for the 3rd PCI selection process and available at the following link https://www.entsog.eu/public/uploads/files/publications/CBA/2017/ENTSGO_G_Project_Fiche_Template.pdf (please elaborate)? | Response Please elaborate your answer below: | |
| Q19 Based on the example provided, is there any additional information the project fiche should cover (please elaborate)? | Response Please elaborate your answer below: | |
| Q20 Do you support that application of CBA to TYNDP covers performance of PS-CBA (please elaborate)? | Response Please elaborate your answer below: | |
| Q21 Do you agree with the publication of PS-CBA results and relevant project information in the TYNDP through a Project Fiche (please elaborate)? | Response Please elaborate your answer below: | |

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| Q22 Do you agree that the Project Fiche scope identified by ENTOSG should have PS-CBA results published (only for projects confirming their previous application for the PCI label as described at page 11 of the supporting document) (please elaborate)? | Response | |
| | Please elaborate your answer below: | |
| Q23 Do you have any comments on the PS-CBA elements proposed for publication as part of TYNDP (please elaborate)? | Response | Yes |
| | Please elaborate your answer below: | The highest possible level of transparency should be ensured and made publicly available to enable proper scrutiny of possible future projects of "common interest". |
| 3. A CBA BUILDING ON COMPLEMENTARY MONETISED AND QUANTIFIED BENEFITS | | |
| Q24 Do you agree that the ESW CBA methodology should maintain a Multi-Criteria Analysis (MCA) approach where the monetary analysis is complemented by non-monetary and qualitative assessment (please elaborate)? | Response | Yes |
| | Please elaborate your answer below: | On CO2 monetization see answer to Q 28. |
| Q25 What are your views on the current European-wide approach for security of supply (SoS) monetisation followed by ENTOSG (please elaborate)? | Response | |
| | Please elaborate your answer below: | While studies show that possible security of supply issues in Europe are limited to a fairly small region in the South East of the EU (http://www.energyunionchoices.eu/wp-content/uploads/2016/07/E3G_More_security_lower_cost_-_Gas_infrastructure_in_Europe.pdf) and that even there non-infrastructure solutions could alleviate the problem, e.g. energy efficiency measures which have a significant impact on reducing gas demand in the region (bpie.eu/wp-content/uploads/2016/09/Safeguarding-energy-security-in-South-East-Europe-with-investment-in-demand-side-infrastructure.pdf), we want to point out to the risk of an exaggerated perceived need for infrastructure to address SoS issues on the part of ENTOSG. An approach more aligned with reality concerning gas demand forecast and SoS issues would actually lead to an extremely limited number of necessary infrastructure projects. These should then be additionally assessed in light of alternative solution options. |
| Q26 Would you see benefits in considering a more "country/consumer-based" approach instead of the above mentioned European-wide approach, and if yes, please precise how (please elaborate)? | Response | |
| | Please elaborate your answer below: | |
| Q27 Is there any data source that ENTOSG could consider using for Value of Lost Load (VoLL) and security of supply (SoS) monetisation in the updated CBA methodology and if yes, which ones (please elaborate)? | Response | |
| | Please elaborate your answer below: | |
| Q28 Do you agree with ENTOSG's view that a specific monetisation of CO2 emissions should be done when the capacity brought by projects can be clearly linked to an increase in gas consumption and a consequent reduction of CO2 emissions (please elaborate)? | Response | No |
| | Please elaborate your answer below: | Gas is a fossil fuel and still emits a significant amount of CO2. Although switching from gas to coal could mean a reduction of carbon emissions, methane emissions should also be taken into account. Natural gas is composed mostly of methane, a very potent greenhouse gas, which is found to be leaking at many different levels of the fossil gas lifecycle. Correctly measuring the impact of new gas projects on both CO2 and methane emissions could lead even to an increased amount of CO2 and CO2 equivalent emissions. This is particularly the case, if emissions during the entire life-cycle of gas expected to flow in new gas projects is accounted for. For conventional fossil gas, the scientific community commonly agrees that between 3.6% and 5.4% of the lifetime production of gas wells is emitted to the atmosphere, including both leaking and venting at the well site and during storage & delivery to consumers. (Miller et al, 2013 (http://www.pnas.org/content/early/2013/11/20/1314392110.abstract), Brandt et al, 2014 (http://www.sciencemag.org/content/343/6172/733)) For US shale gas – which could soon represent an important share of European gas imports, according to the EU strategy for LNG and gas storage – information is still being gathered, but emissions are likely 3-fold greater. (https://ec.europa.eu/energy/sites/ener/files/documents/1_EN_ACT_part1_v10-1.pdf) In the context of the Paris Agreement, these emissions should certainly not be downplayed, especially with regards to the much higher greenhouse gas footprint that methane has compared to carbon dioxide (CO2). It is commonly accepted that methane is 21-times more powerful than CO2 as a greenhouse gas. This idea is however based on a twenty-year-old report of the Intergovernmental Panel on Climate Change (IPCC) in 1995. In 2013, the IPCC updated its data and stated that methane is more than hundred times more |
| Q29 Would you have any suggestion on how to better measure CO2 reductions in mature markets in relation to existing and/or new infrastructure (please elaborate)? | Response | Yes |
| | Please elaborate your answer below: | Instead of monetizing a possible reduction of CO2 emissions as a consequence of shifting from oil to gas as a benefit, the significant cost of additional CO2 and methane emissions should be taken into account for the whole lifespan of the infrastructure. CO2 emission changes should not be measured against the background of other fossil fuels but set in relation to non-infrastructure solutions for existing problems (e.g. energy efficiency) or to renewable energy projects, which would have substantially lower emissions. |

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| Q30 Do you support monetisation of CO2 reduction to be based on a Social Cost of Carbon (SCC) rather than on the CO2 market prices (please elaborate)? | Response | |
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| Q33 Is there any other element or CBA indicator for which you would have monetisation suggestions (please elaborate)? | Response | |
| | Please elaborate your answer below: | |
| Q34 Do you have any specific view regarding whether and how market modelling is relevant in the framework of infrastructure assessment (please elaborate)? | Response | Yes |
| | Please elaborate your answer below: | With systematic overestimations of future gas demands and a significant overall decline in European gas consumption, together with commitments to reach important reductions of greenhouse gas emissions on the mid and longer term, it is necessary to adapt market modeling to a low-carbon future that will need to become reality in the next years in order to avoid a disorderly transition and to avoid investing in assets that will necessarily be stranded to comply with climate and energy targets on the mid term. |
| Q35 Could you indicate any source for input data required for the implementation of a market model (such as tariffs, supply prices, etc.) (please elaborate)? | Response | |
| | Please elaborate your answer below: | |
| Q36 Would you have any specific views regarding information sources for import prices for the various supply sources and regarding the minimum volumes used to assess market behaviour (please elaborate)? | Response | |
| | Please elaborate your answer below: | |
| Q37 How do you think that import price spread configuration could be further improved (please elaborate)? | Response | |
| | Please elaborate your answer below: | |
| Q38 Consistently with your reply to question 35, what should be the information source for the different supply source prices (please elaborate)? | Response | |
| | Please elaborate your answer below: | |
| Q39 How do you think that LNG diversification could be further improved (please elaborate)? | Response | Counting LNG as only one gas source simply does not reflect reality. LNG supplies can come to Europe from North America, Australia, Qatar, and East Africa. A country with access to an LNG terminal can therefore count on many different sources. Countries with several LNG terminals (e.g. UK, Spain, France, Italy) can additionally dispose of a variety of import "routes". LNG should at least be counted as two sources, if not more, particularly given the current large LNG overcapacities and high reloading activities in e.g. Spain and France (http://www.igu.org/sites/default/files/103419-World_IGU_Report_no%20crops.pdf). |
| | Please elaborate your answer below: | |
| 4. CBA FOR INVESTMENT REQUEST AND CBCA | | |
| Q40 Do you agree that CBA methodology as proposed would support promoters by providing them with a common input framework to be used (e.g. demand scenarios) and outputs indicating detailed benefits at country-level as input to promoters' own project-specific CBAs (please elaborate)? | Response | |
| | Please elaborate your answer below: | |
| Q41 Do you have any additional comment or suggestion that has not been covered in previous questions (please elaborate)? | Response | Yes |
| | Please elaborate your answer below: | There is a lack of appropriately integrating the environmental impact of the gas project itself and the fuel carried in it. We would be very much in favor of a "climate impact assessment", that takes into account the impact of the extraction, the transportation, the building of the infrastructure and the end-use of the gas that will be used during the project's lifetime on climate change. |

| 0. IDENTIFICATION & GENERAL INFORMATION | | |
|---|---|---|
| Q1 What is your organisation? | | Eurogas |
| Q2 How would you describe your organisation? (Please choose the category which best represents your organisation) | Response | Association (please specify type) |
| Q3 Confidentiality: ENTSOG intends to publish the results of this public consultation. ENTSOG will disclose only the organisation name but not the participant's personal information (i.e. name and email address). If your response should remain completely confidential, please indicate it below. Otherwise simply skip the following question. | Response | |
| | Please indicate why : | |
| Q4 Do you have a former experience in reading ENTSOG and/or ENTSO-E TYNDPs? | ENTSOG TYNDP 2015 and/or TYNDP 2017 ENTSOG-E TYNDP 2016 None | ENTSOG TYNDP 2015 and/or TYNDP 2017 ENTSOG-E TYNDP 2016 |
| Q5 Do you have a former experience in reading ENTSOG and/or ENTSO-E CBA methodologies? | Response | Yes |
| Q6 Did you participate in the ENTSOG TYNDP 2017 Stakeholder engagement process? | Response | Yes |
| Q7 Did you participate in the ENTSOG Stakeholder engagement process for the current CBA methodology? | Response | Yes |
| Q8 Do you have experience with the Project of Common Interest (PCI) selection process by the European Commission? | Yes, with the ongoing 3rd PCI selection process Yes, with the 2nd or the 1st PCI selection process No | No |
| Q9 Why is the ENTSOG CBA methodology valuable for you? | Open-Ended Response | In the view of Eurogas, a robust CBA methodology is needed to ensure that any new projects have been subject to a comprehensive evaluation on their costs and market benefits, and decision-making criteria should be transparent and pragmatic. As far as possible, projects should be market-driven. Furthermore, since the ultimate objective is to reach an EU-wide optimised system, there should be a common understanding on the requirements of a CBA and CBCA approach. |
| 1. SIMPLIFICATION | | |
| Q10 Do you have further proposals for simplification of the CBA methodology document (please elaborate)? | Response | |
| | Please elaborate your answer below: | It is difficult to see how the CBA as a whole can be simplified, but the views of stakeholders more directly involved in the process should be heeded on the possibilities of streamlining and also clarifying procedures and information requirements. Some aspects of the analysis can be scaled down or changed. The market modelling for example, involving assumed pricing projections, is currently very complex, and Eurogas members have been critical of its core hypotheses. The synergy of the methodology should be coherent, but also enable the project promoter to present reliable information and results. |
| Q11 Do you agree that the approach of using the TYNDP assessment of infrastructure needs which is performed for each new TYNDP edition to set the frame for the Project-specific assessment would ensure a focused and pragmatic approach (please elaborate) | Response | Yes |
| | Please elaborate your answer below: | The TYNDP assessment should help set the context or framework in which a focused project specific assessment would be carried out. To ensure maximum efficiency in project determination, the process should be transparent. |
| Q12 Would you see some indicators as having limited additional value for CBA analysis? Which ones and for which reason (please elaborate) | Response | Yes |
| | Please elaborate your answer below: | Some indicators will have less value than others, notably if the associated assumptions and methods are weak, eg in market models. The value of the indicators may also vary in different contexts, depending on the given country/region, eg; in a country with very obvious diversification limitations compared with a country well supplied from different sources. |
| Q13 Would you agree on the relevance of the ADVANCED infrastructure level (please elaborate)? | Response | Yes |
| | Please elaborate your answer below: | Eurogas attached importance to this inclusion of an element of Advance Project Status in the TYNDP 2017. |
| Q14 Do you agree with the proposal that the updated CBA methodology should discard the HIGH infrastructure level (please elaborate) | Response | Yes |
| | Please elaborate your answer below: | |
| Q15 Do you think the CBA methodology should keep considering the PCI infrastructure level for the TYNDP assessment (please elaborate) | Response | Yes |
| | Please elaborate your answer below: | The PCI implementation level already affords a more EU-wide system based view. Evident infrastructure gaps are not conducive to a robust market, but the solutions should be the most cost-efficient. For a PCI especially the benefits of market functioning should be included in the CBA, which should bring more competitive market prices and societal benefits. |
| 2. A CBA METHODOLOGY WITH AN INCREASED FOCUS ON PROJECT-SPECIFIC CBA | | |
| Q16 Do you support that CBA methodology would include guidance on project grouping (please elaborate)? | Response | Yes |
| | Please elaborate your answer below: | As Eurogas considers that the CBA methodology is very important in the process for selecting the most cost-efficient projects in a regional (eventually European) context, then there would be value in guidance on project grouping. CBA methodology, through facilitating a better understanding of project interaction, should help to identify which projects are justified and to capture full potential. |

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| Q17 Would you have any view on criteria to be retained for grouping (please elaborate)? | Response | Yes |
| | Please elaborate your answer below: | Criteria should be transparent, including the specifications with regard to the methodology adopted in grouping. The grouping rules should also take into consideration common purposes of proposed investments where these exist, and contribute to the identification of competing projects. |
| Q18 Do you support the proposal of a Project Fiche template (in terms of content, please refer to the version for the project fiche as defined for the 3rd PCI selection process and available at the following link https://www.entsog.eu/public/uploads/files/publications/CBA/2017/ENTSO_G_Project_Fiche_Template.pdf (please elaborate)? | Response | Yes |
| | Please elaborate your answer below: | A template format has value for common aspects that require to be well defined, as well as for essential information, but some flexibility should be foreseen for market-oriented projects. |
| Q19 Based on the example provided, is there any additional information the project fiche should cover (please elaborate)? | Response | Yes |
| | Please elaborate your answer below: | Competing projects should be identified and costs-benefits oriented to agreed objective set of regional needs. |
| Q20 Do you support that application of CBA to TYNDP covers performance of PS-CBA (please elaborate)? | Response | |
| | Please elaborate your answer below: | |
| Q21 Do you agree with the publication of PS-CBA results and relevant project information in the TYNDP through a Project Fiche (please elaborate)? | Response | Yes |
| | Please elaborate your answer below: | More transparency is important, and we support this in principle, although as confidential information should be protected, partial disclosure could be possible in some areas. |
| Q22 Do you agree that the Project Fiche scope identified by ENTOSG should have PS-CBA results published (only for projects confirming their previous application for the PCI label as described at page 11 of the supporting document) (please elaborate)? | Response | Yes |
| | Please elaborate your answer below: | If the project is to benefit from public funding, it is especially important to enhance transparency, including information on the impact on tariffs. |
| Q23 Do you have any comments on the PS-CBA elements proposed for publication as part of TYNDP (please elaborate)? | Response | |
| | Please elaborate your answer below: | |
| 3. A CBA BUILDING ON COMPLEMENTARY MONETISED AND QUANTIFIED BENEFITS | | |
| Q24 Do you agree that the ESW CBA methodology should maintain a Multi-Criteria Analysis (MCA) approach where the monetary analysis is complemented by non-monetary and qualitative assessment (please elaborate)? | Response | Yes |
| | Please elaborate your answer below: | Not all benefits can be easily quantified or lend themselves to harmonised monetisation. Nonetheless qualitative benefits can be very significant for particular countries or regions. However, an adequately transparent process would be necessary to ensure that there is no opportunity to steer an outcome, eg. through a less than objective weighing of some factors. |
| Q25 What are your views on the current European-wide approach for security of supply (SoS) monetisation followed by ENTOSG (please elaborate)? | Response | |
| | Please elaborate your answer below: | The approach sounds ok in principle, but in practice could be very difficult to realise. Furthermore, the approach in 4.2.1 seems very Member State focused and perhaps should be adapted to reflect the emphasis on regional cooperation, aligned with the requirements of the Security of Gas Supply Regulation. |
| Q26 Would you see benefits in considering a more "country/consumer-based" approach instead of the above mentioned European-wide approach, and if yes, please precise how (please elaborate)? | Response | No |
| | Please elaborate your answer below: | A European-wide approach, building on identified regional needs, is preferred. It would in any case be unduly challenging to try for a narrower country/consumer based approach. |
| Q27 Is there any data source that ENTOSG could consider using for Value of Lost Load (VoLL) and security of supply (SoS) monetisation in the updated CBA methodology and if yes, which ones (please elaborate)? | Response | |
| | Please elaborate your answer below: | |
| Q28 Do you agree with ENTOSG's view that a specific monetisation of CO2 emissions should be done when the capacity brought by projects can be clearly linked to an increase in gas consumption and a consequent reduction of CO2 emissions (please elaborate)? | Response | |
| | Please elaborate your answer below: | Eurogas agrees on the added value of trying to evaluate CO2 emissions. Supply-chain cost-benefit analyses should be carried out, including benefits to consumers and taxpayers. In a CBA, when a gas project reduces CO2 (and/or makes energy more affordable) this should be factored in. Very often, a gas-based solution may be more cost-efficient than an electricity-based solution to reduce CO2. Therefore, ENTOSG and ENTOSG-E should improve their cooperation to arrive at energy solutions that bring the best results on an integrated basis (sector coupling gas and electricity). |
| Q29 Would you have any suggestion on how to better measure CO2 reductions in mature markets in relation to existing and/or new infrastructure (please elaborate)? | Response | No |
| | Please elaborate your answer below: | The considerations in mature and developing energy markets are likely to be different. |

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| Q30 Do you support monetisation of CO2 reduction to be based on a Social Cost of Carbon (SCC) rather than on the CO2 market prices (please elaborate)? | Response | No |
| | Please elaborate your answer below: | This is an interesting question. Perhaps in the longer-term this could be the right approach but as yet it is not enough developed for decision making. For now it would be consistent to use the CO2 price used in the TYNDP modelling. |
| Q31 [If YES in the above question] Would you recommend any specific information source on Social Cost of Carbon (SCC) (please elaborate)? | Response | |
| | Please elaborate your answer below: | |
| Q32 Would you have any specific suggestion on a methodology or proxy for the monetisation of the supply source diversification assessment (please elaborate)? | Response | No |
| | Please elaborate your answer below: | But Eurogas agrees a prerequisite should be a robust market with no regulated prices. |
| Q33 Is there any other element or CBA indicator for which you would have monetisation suggestions (please elaborate)? | Response | |
| | Please elaborate your answer below: | It could be useful if the cost and benefits of various analyses are attributed to groups of market actors (TSO, shipper, or consumer). For Eurogas, it is especially important that shippers should understand how the costs may be met through tariffs, and that there is a better understanding of the balance of market-led and societal drivers. |
| Q34 Do you have any specific view regarding whether and how market modelling is relevant in the framework of infrastructure assessment (please elaborate)? | Response | Yes |
| | Please elaborate your answer below: | ENTSOG should be more open to the need for greater transparency and computation of the impact of cross-border tariffs in their models, and the impact of new projects on tariffs. Not doing so risks damaging confidence in the outcomes (see also 33). |
| Q35 Could you indicate any source for input data required for the implementation of a market model (such as tariffs, supply prices, etc.) (please elaborate)? | Response | |
| | Please elaborate your answer below: | Tariffs, in the sense of end-user prices, are widely published and trends analysed. Supply prices, if that refers to prices suppliers pay, constitute commercially sensitive information. Although market monitoring organisations speculate, it will be very difficult to find reliable sources. |
| Q36 Would you have any specific views regarding information sources for import prices for the various supply sources and regarding the minimum volumes used to assess market behaviour (please elaborate)? | Response | |
| | Please elaborate your answer below: | |
| Q37 How do you think that import price spread configuration could be further improved (please elaborate)? | Response | |
| | Please elaborate your answer below: | |
| Q38 Consistently with your reply to question 35, what should be the information source for the different supply source prices (please elaborate)? | Response | |
| | Please elaborate your answer below: | |
| Q39 How do you think that LNG diversification could be further improved (please elaborate)? | Response | |
| | Please elaborate your answer below: | Eurogas supports a multi-source supply approach. |
| 4. CBA FOR INVESTMENT REQUEST AND CBCA | | |
| Q40 Do you agree that CBA methodology as proposed would support promoters by providing them with a common input framework to be used (e.g. demand scenarios) and outputs indicating detailed benefits at country-level as input to promoters' own project-specific CBAs (please elaborate)? | Response | |
| | Please elaborate your answer below: | This could be useful, but ultimately project promoters will have to employ their own knowledge and risk-assessment of the market. |
| Q41 Do you have any additional comment or suggestion that has not been covered in previous questions (please elaborate)? | Response | |
| | Please elaborate your answer below: | |

| 0. IDENTIFICATION & GENERAL INFORMATION | | |
|--|---|--|
| Q1 What is your organisation? | | Edison SpA |
| Q2 How would you describe your organisation? (Please choose the category which best represents your organisation) | Response | Other (please specify) |
| Q3 Confidentiality: ENTSG intends to publish the results of this public consultation. ENTSG will disclose only the organisation name but not the participant's personal information (i.e. name and email address). If your response should remain completely confidential, please indicate it below. Otherwise simply skip the following question. | Response | |
| | Please indicate why : | |
| Q4 Do you have a former experience in reading ENTSG and/or ENTSG-E TYNDPs? | ENTSG TYNDP 2015 and/or TYNDP 2017 ENTSG-E TYNDP 2016 None | ENTSG TYNDP 2015 and/or TYNDP 2017 |
| Q5 Do you have a former experience in reading ENTSG and/or ENTSG-E CBA methodologies? | Response | Yes |
| Q6 Did you participate in the ENTSG TYNDP 2017 Stakeholder engagement process? | Response | Yes |
| Q7 Did you participate in the ENTSG Stakeholder engagement process for the current CBA methodology? | Response | Yes |
| Q8 Do you have experience with the Project of Common Interest (PCI) selection process by the European Commission? | Yes, with the ongoing 3rd PCI selection process Yes, with the 2nd or the 1st PCI selection process No | Yes, with the ongoing 3rd PCI selection process Yes, with the 2nd or the 1st PCI selection process |
| Q9 Why is the ENTSG CBA methodology valuable for you? | Open-Ended Response | |
| 1. SIMPLIFICATION | | |
| Q10 Do you have further proposals for simplification of the CBA methodology document (please elaborate)? | Response | Yes |
| | Please elaborate your answer below: | Edison welcomes the opportunity to answer this ENTSG-G public consultation and appreciates the effort made in providing a proposal for the simplification of the CBA methodology. The methodology should produce reliable and exhaustive outputs, measuring all the relevant metrics based on realistic reproductions of the system. In this respect a simplification is necessary in order to make the outputs more manageable both for stakeholders and project promoters. |
| Q11 Do you agree that the approach of using the TYNDP assessment of infrastructure needs which is performed for each new TYNDP edition to set the frame for the Project-specific assessment would ensure a focused and pragmatic approach (please elaborate) | Response | |
| | Please elaborate your answer below: | |
| Q12 Would you see some indicators as having limited additional value for CBA analysis? Which ones and for which reason (please elaborate) | Response | |
| | Please elaborate your answer below: | |
| Q13 Would you agree on the relevance of the ADVANCED infrastructure level (please elaborate)? | Response | No |
| | Please elaborate your answer below: | To include the incremental criteria and to avoid any overlap between different scenarios, we propose the following 3 scenarios: 1 Low: Existing infrastructures + FID Projects 2 Medium: Existing infrastructures + FID Projects + Non-FID PCI Projects 3 High: Existing infrastructures + FID Projects + Non-FID PCI Projects + Non-FID Non PCI Advanced Projects |
| Q14 Do you agree with the proposal that the updated CBA methodology should discard the HIGH infrastructure level (please elaborate) | Response | Yes |
| | Please elaborate your answer below: | See answer to Question 13 |
| Q15 Do you think the CBA methodology should keep considering the PCI infrastructure level for the TYNDP assessment (please elaborate) | Response | |
| | Please elaborate your answer below: | See answer to Question 13 |
| 2. A CBA METHODOLOGY WITH AN INCREASED FOCUS ON PROJECT-SPECIFIC CBA | | |
| Q16 Do you support that CBA methodology would include guidance on project grouping (please elaborate)? | Response | Yes |
| | Please elaborate your answer below: | Yes, we support the proposal to include guidance for project grouping based on a clear and transparent criteria subject to stakeholders and project-promoters approval. Projects groupings should be proposed by their own project promoters in accordance to the defined criteria. |
| Q17 Would you have any view on criteria to be retained for grouping (please elaborate)? | Response | Yes |
| | Please elaborate your answer below: | We recommend the use of clear and transparent criteria based on the interdependency of the projects and on the benefits within the group. The grouping rules should take in consideration the common purpose of projects items. |
| Q18 Do you support the proposal of a Project Fiche template (in terms of content, please refer to the version for the project fiche as defined for the 3rd PCI selection process and available at the following link https://www.entsog.eu/public/uploads/files/publications/CBA/2017/ENTSG_G_Project_Fiche_Template.pdf (please elaborate)? | Response | No |
| | Please elaborate your answer below: | The Project Fiche template, as currently defined, takes into consideration a set of indicators, the evaluation criteria and certain thresholds that are functional to the 3rd PCI selection process. We believe that, in light with TYNDP scope, is sufficient a project data sheet, that includes projects information such as brief description, technical details, schedule or comments on benefits. |
| Q19 Based on the example provided, is there any additional information the project fiche should cover (please elaborate)? | Response | |
| | Please elaborate your answer below: | |

| | | |
|---|-------------------------------------|---|
| Q20 Do you support that application of CBA to TYNDP covers performance of PS-CBA (please elaborate)? | Response | No |
| | Please elaborate your answer below: | The inclusion in the TYNDP should not depend on the results of a PS-CBA. The performance of the PS-CBA shall remain at the PCI selection level to which candidacy is the only project promoter decision. |
| Q21 Do you agree with the publication of PS-CBA results and relevant project information in the TYNDP through a Project Fiche (please elaborate)? | Response | No |
| | Please elaborate your answer below: | See answer to Question 20 |
| Q22 Do you agree that the Project Fiche scope identified by ENTSG should have PS-CBA results published (only for projects confirming their previous application for the PCI label as described at page 11 of the supporting document) (please elaborate)? | Response | No |
| | Please elaborate your answer below: | The Project Fiche with PS-CBA results should remain available only for members of Regional Groups. |
| Q23 Do you have any comments on the PS-CBA elements proposed for publication as part of TYNDP (please elaborate)? | Response | Yes |
| | Please elaborate your answer below: | We believe that projects data considered commercially sensitive should be adequately protected and not be published or disclosed by competent authorities. Moreover, we would like to highlight that the analysis made within the TYNDP, using the ESW CBA methodology, should avoid closer assessment of each projects compared to the current practice in the TYNDP, thus excluding the use of commercially sensitive data related to investment projects |
| 3. A CBA BUILDING ON COMPLEMENTARY MONETISED AND QUANTIFIED BENEFITS | | |
| Q24 Do you agree that the ESW CBA methodology should maintain a Multi-Criteria Analysis (MCA) approach where the monetary analysis is complemented by non-monetary and qualitative assessment (please elaborate)? | Response | Yes |
| | Please elaborate your answer below: | Yes we agree. Given the complexity of the European gas system it's very important to maintain a Multi-Criteria Analysis in order to properly capture the relevant impacts and benefits of the energy infrastructure projects. |
| Q25 What are your views on the current European-wide approach for security of supply (SoS) monetisation followed by ENTSG (please elaborate)? | Response | |
| | Please elaborate your answer below: | |
| Q26 Would you see benefits in considering a more "country/consumer-based" approach instead of the above mentioned European-wide approach, and if yes, please precise how (please elaborate)? | Response | No |
| | Please elaborate your answer below: | At this stage, it could be complex and difficult to build an approach "country/consumer-based". |
| Q27 Is there any data source that ENTSG could consider using for Value of Lost Load (VoLL) and security of supply (SoS) monetisation in the updated CBA methodology and if yes, which ones (please elaborate)? | Response | |
| | Please elaborate your answer below: | |
| Q28 Do you agree with ENTSG's view that a specific monetisation of CO2 emissions should be done when the capacity brought by projects can be clearly linked to an increase in gas consumption and a consequent reduction of CO2 emissions (please elaborate)? | Response | Yes |
| | Please elaborate your answer below: | The gas contribution to the reduction of CO2 emissions should be taken into consideration in the specific monetisation. |
| Q29 Would you have any suggestion on how to better measure CO2 reductions in mature markets in relation to existing and/or new infrastructure (please elaborate)? | Response | |
| | Please elaborate your answer below: | |
| Q30 Do you support monetisation of CO2 reduction to be based on a Social Cost of Carbon (SCC) rather than on the CO2 market prices (please elaborate)? | Response | Yes |
| | Please elaborate your answer below: | We support the use of SCC. We believe that it could reflect the full marginal cost of emitting one extra ton of CO2 into the atmosphere, allowing the definition of a central value for the parameters used. In general we suggest the adoption of an indicator able to capture and cover the externalities of CO2 emissions. |
| Q31 [If YES in the above question] Would you recommend any specific information source on Social Cost of Carbon (SCC) (please elaborate)? | Response | Yes |
| | Please elaborate your answer below: | We recommend that the estimation of the SCC will be based and documented on the benchmark of the exiting reference studies of the subject. We highly recommend using all the information ensuring that the indicator will be able to capture all the environmental externalities and to estimate the marginal social cost of emitting CO2. |
| Q32 Would you have any specific suggestion on a methodology or proxy for the monetisation of the supply source diversification assessment (please elaborate)? | Response | |
| | Please elaborate your answer below: | |
| Q33 Is there any other element or CBA indicator for which you would have monetisation suggestions (please elaborate)? | Response | Yes |
| | Please elaborate your answer below: | We suggest the integration of still isolated Member States (Cyprus, Malta) or large regions or islands part of Member States (Crete, Sardinia, Corsica) |
| Q34 Do you have any specific view regarding whether and how market modelling is relevant in the framework of infrastructure assessment (please elaborate)? | Response | Yes |

| | | |
|---|---|---|
| | Please elaborate your answer below: | The market modelling could be relevant if it would be implemented in a way that considers the strengths and weakness of the today's situation of the whole area covered for an easier and more impartial understanding of the future development needs. |
| Q35 Could you indicate any source for input data required for the implementation of a market model (such as tariffs, supply prices, etc.) (please elaborate)? | Response Please elaborate your answer below: | Yes We believe that a source for the implementation of a market model could be supply prices. A potential interesting development is the creation of an indicator that weights the supply prices (calculated as the average fuel prices on the national installed capacity) and the number of available supply sources for single Country. |
| Q36 Would you have any specific views regarding information sources for import prices for the various supply sources and regarding the minimum volumes used to assess market behaviour (please elaborate)? | Response Please elaborate your answer below: | |
| Q37 How do you think that import price spread configuration could be further improved (please elaborate)? | Response Please elaborate your answer below: | Yes A further improvement could be reached by considering the price as sum of two components: a define fix part (for example it could be represented by a specific gas quotation) and a variable part, Country specific based, calculated as the sum of pre-configured factors (for example: geopolitical situation, transportation costs, etc). |
| Q38 Consistently with your reply to question 35, what should be the information source for the different supply source prices (please elaborate)? | Response Please elaborate your answer below: | |
| Q39 How do you think that LNG diversification could be further improved (please elaborate)? | Response Please elaborate your answer below: | |
| 4. CBA FOR INVESTMENT REQUEST AND CBCA | | |
| Q40 Do you agree that CBA methodology as proposed would support promoters by providing them with a common input framework to be used (e.g. demand scenarios) and outputs indicating detailed benefits at country-level as input to promoters' own project-specific CBAs (please elaborate)? | Response Please elaborate your answer below: | |
| Q41 Do you have any additional comment or suggestion that has not been covered in previous questions (please elaborate)? | Response Please elaborate your answer below: | |

| 0. IDENTIFICATION & GENERAL INFORMATION | | |
|--|---|--|
| Q1 What is your organisation? | | |
| Q2 How would you describe your organisation? (Please choose the category which best represents your organisation) | Response | Association (please specify type) |
| Q3 Confidentiality: ENTSOG intends to publish the results of this public consultation. ENTSOG will disclose only the organisation name but not the participant's personal information (i.e. name and email address). If your response should remain completely confidential, please indicate it below. Otherwise simply skip the following question. | Response | My response should only be disclosed anonymously |
| | Please indicate why : | |
| Q4 Do you have a former experience in reading ENTSOG and/or ENTSO-E TYNDPs? | ENTSOG TYNDP 2015 and/or TYNDP 2017 ENTSOG-E TYNDP 2016 None | ENTSOG TYNDP 2015 and/or TYNDP 2017 |
| Q5 Do you have a former experience in reading ENTSOG and/or ENTSO-E CBA methodologies? | Response | Yes |
| Q6 Did you participate in the ENTSOG TYNDP 2017 Stakeholder engagement process? | Response | No |
| Q7 Did you participate in the ENTSOG Stakeholder engagement process for the current CBA methodology? | Response | No |
| Q8 Do you have experience with the Project of Common Interest (PCI) selection process by the European Commission? | Yes, with the ongoing 3rd PCI selection process Yes, with the 2nd or the 1st PCI selection process No | No |
| Q9 Why is the ENTSOG CBA methodology valuable for you? | Open-Ended Response | It enables investment decisions based on objective and verifiable methods. |
| 1. SIMPLIFICATION | | |
| Q10 Do you have further proposals for simplification of the CBA methodology document (please elaborate)? | Response | No |
| | Please elaborate your answer below: | |
| Q11 Do you agree that the approach of using the TYNDP assessment of infrastructure needs which is performed for each new TYNDP edition to set the frame for the Project-specific assessment would ensure a focused and pragmatic approach (please elaborate) | Response | Yes |
| | Please elaborate your answer below: | |
| Q12 Would you see some indicators as having limited additional value for CBA analysis? Which ones and for which reason (please elaborate) | Response | Yes |
| | Please elaborate your answer below: | We have some reservation concerning applicability of the indicators for all member states. It is our opinion that the indicators are suitable for larger with large projects and flows of natural gas. We believe that these indicators, from European point of view, have somewhat limited value for smaller countries as they get lost in large number of bigger projects. |
| Q13 Would you agree on the relevance of the ADVANCED infrastructure level (please elaborate)? | Response | Yes |
| | Please elaborate your answer below: | We agree, especially in connection with the removal of the HIGH infrastructure level. |
| Q14 Do you agree with the proposal that the updated CBA methodology should discard the HIGH infrastructure level (please elaborate) | Response | Yes |
| | Please elaborate your answer below: | We agree with the proposal, because we believe that this level, due to high uncertainty of commissioning, may give incorrect estimations. |
| Q15 Do you think the CBA methodology should keep considering the PCI infrastructure level for the TYNDP assessment (please elaborate) | Response | Yes |
| | Please elaborate your answer below: | |
| 2. A CBA METHODOLOGY WITH AN INCREASED FOCUS ON PROJECT-SPECIFIC CBA | | |
| Q16 Do you support that CBA methodology would include guidance on project grouping (please elaborate)? | Response | Yes |
| | Please elaborate your answer below: | |
| Q17 Would you have any view on criteria to be retained for grouping (please elaborate)? | Response | Yes |
| | Please elaborate your answer below: | Projects that form a certain group must be functionally and operationally linked. |
| Q18 Do you support the proposal of a Project Fiche template (in terms of content, please refer to the version for the project fiche as defined for the 3rd PCI selection process and available at the following link https://www.entsog.eu/public/uploads/files/publications/CBA/2017/ENTSOG_Project_Fiche_Template.pdf (please elaborate)? | Response | Yes |
| | Please elaborate your answer below: | |
| Q19 Based on the example provided, is there any additional information the project fiche should cover (please elaborate)? | Response | No |
| | Please elaborate your answer below: | We believe that it is not necessary to include additional information. |
| Q20 Do you support that application of CBA to TYNDP covers performance of PS-CBA (please elaborate)? | Response | |
| | Please elaborate your answer below: | We have some reservations regarding this issue. We propose that project promoter should give his previous permission for publication. |
| Q21 Do you agree with the publication of PS-CBA results and relevant project information in the TYNDP through a Project Fiche (please elaborate)? | Response | |
| | Please elaborate your answer below: | Same remark as for question 11. |
| Q22 Do you agree that the Project Fiche scope identified by ENTSOG should have PS-CBA results published (only for projects confirming their previous application for the PCI label as described at page 11 of the supporting document) (please elaborate)? | Response | |
| | Please elaborate your answer below: | Same remark as for question 11. |

| | | |
|---|-------------------------------------|--|
| Q23 Do you have any comments on the PS-CBA elements proposed for publication as part of TYNDP (please elaborate)? | Response | |
| | Please elaborate your answer below: | Same remark as for question 11. |
| 3. A CBA BUILDING ON COMPLEMENTARY MONETISED AND QUANTIFIED BENEFITS | | |
| Q24 Do you agree that the ESW CBA methodology should maintain a Multi-Criteria Analysis (MCA) approach where the monetary analysis is complemented by non-monetary and qualitative assessment (please elaborate)? | Response | Yes |
| | Please elaborate your answer below: | |
| Q25 What are your views on the current European-wide approach for security of supply (SoS) monetisation followed by ENTSOG (please elaborate)? | Response | |
| | Please elaborate your answer below: | By the current approach the basic comparison of curtailment consequences is enabled – to take into account also different country-boundary conditions for comparison of consequences we would recommend to investigate the country-based approach. |
| Q26 Would you see benefits in considering a more “country/consumer-based” approach instead of the above mentioned European-wide approach, and if yes, please precise how (please elaborate)? | Response | |
| | Please elaborate your answer below: | Yes. More detailed analysis of disrupted demand considering country specifics could be important for estimation of demand disruption costs for small countries. |
| Q27 Is there any data source that ENTSOG could consider using for Value of Lost Load (VoLL) and security of supply (SoS) monetisation in the updated CBA methodology and if yes, which ones (please elaborate)? | Response | Yes |
| | Please elaborate your answer below: | Yes. The published country specific GDP-data and consumption-data can be used. |
| Q28 Do you agree with ENTSOG’s view that a specific monetisation of CO2 emissions should be done when the capacity brought by projects can be clearly linked to an increase in gas consumption and a consequent reduction of CO2 emissions (please elaborate)? | Response | Yes |
| | Please elaborate your answer below: | |
| Q29 Would you have any suggestion on how to better measure CO2 reductions in mature markets in relation to existing and/or new infrastructure (please elaborate)? | Response | No |
| | Please elaborate your answer below: | |
| Q30 Do you support monetisation of CO2 reduction to be based on a Social Cost of Carbon (SCC) rather than on the CO2 market prices (please elaborate)? | Response | |
| | Please elaborate your answer below: | The SCC-based approach and its influence on results are not well-defined yet. |
| Q31 [If YES in the above question] Would you recommend any specific information source on Social Cost of Carbon (SCC) (please elaborate)? | Response | |
| | Please elaborate your answer below: | |
| Q32 Would you have any specific suggestion on a methodology or proxy for the monetisation of the supply source diversification assessment (please elaborate)? | Response | |
| | Please elaborate your answer below: | |
| Q33 Is there any other element or CBA indicator for which you would have monetisation suggestions (please elaborate)? | Response | |
| | Please elaborate your answer below: | |
| Q34 Do you have any specific view regarding whether and how market modelling is relevant in the framework of infrastructure assessment (please elaborate)? | Response | |
| | Please elaborate your answer below: | Market modelling results could only be as good as the assumptions and the data used for the modelling are accurate. It is crucial that the parties involved in the modelling provide accurate data, because we believe that market modelling results are only accurate if the correct assumptions and correct data are used. |
| Q35 Could you indicate any source for input data required for the implementation of a market model (such as tariffs, supply prices, etc.) (please elaborate)? | Response | |
| | Please elaborate your answer below: | According to relevant NC and regulation the source of tariffs is definitely all the TSO (maybe also the ENTSOG TP). |
| Q36 Would you have any specific views regarding information sources for import prices for the various supply sources and regarding the minimum volumes used to assess market behaviour (please elaborate)? | Response | |
| | Please elaborate your answer below: | |
| Q37 How do you think that import price spread configuration could be further improved (please elaborate)? | Response | |
| | Please elaborate your answer below: | |
| Q38 Consistently with your reply to question 35, what should be the information source for the different supply source prices (please elaborate)? | Response | |
| | Please elaborate your answer below: | |
| Q39 How do you think that LNG diversification could be further improved (please elaborate)? | Response | |
| | Please elaborate your answer below: | As is the case for all modelling it is crucial that the data used in the model is accurate and has a solid background. If the assumptions are unrealistic, so will be the results of the model. |
| 4. CBA FOR INVESTMENT REQUEST AND CBCA | | |
| Q40 Do you agree that CBA methodology as proposed would support promoters by providing them with a common input framework to be used (e.g. demand scenarios) and outputs indicating detailed benefits at country-level as input to promoters’ own project-specific CBAs (please elaborate)? | Response | Yes |
| | Please elaborate your answer below: | |

Q41 Do you have any additional comment or suggestion that has not been covered in previous questions (please elaborate)?

Response

Please elaborate your answer below:

The methodology should take into account the social benefits in an individual EU Member State, regardless of its size. We fear that the projects, which for smaller member states are large and have significant social benefits, are from the European perspective still small and would therefore not be certified as PCI, would not receive financial assistance and will therefore not be implemented.

| 0. IDENTIFICATION & GENERAL INFORMATION | | |
|--|---|---|
| Q1 What is your organisation? | | EFET |
| Q2 How would you describe your organisation? (Please choose the category which best represents your organisation) | Response | Association (please specify type) |
| Q3 Confidentiality: ENTSG intends to publish the results of this public consultation. ENTSG will disclose only the organisation name but not the participant's personal information (i.e. name and email address). If your response should remain completely confidential, please indicate it below. Otherwise simply skip the following question. | Response | |
| | Please indicate why : | |
| Q4 Do you have a former experience in reading ENTSG and/or ENTSG-E TYNDPs? | ENTSG TYNDP 2015 and/or TYNDP 2017 ENTSG-E TYNDP 2016 None | ENTSG TYNDP 2015 and/or TYNDP 2017 |
| Q5 Do you have a former experience in reading ENTSG and/or ENTSG-E CBA methodologies? | Response | Yes |
| Q6 Did you participate in the ENTSG TYNDP 2017 Stakeholder engagement process? | Response | Yes |
| Q7 Did you participate in the ENTSG Stakeholder engagement process for the current CBA methodology? | Response | Yes |
| Q8 Do you have experience with the Project of Common Interest (PCI) selection process by the European Commission? | Yes, with the ongoing 3rd PCI selection process Yes, with the 2nd or the 1st PCI selection process No | No |
| Q9 Why is the ENTSG CBA methodology valuable for you? | Open-Ended Response | To understand better the likelihood of projects progressing. Should also contribute to the ability to predict tariffs better. |
| 1. SIMPLIFICATION | | |
| Q10 Do you have further proposals for simplification of the CBA methodology document (please elaborate)? | Response | No |
| | Please elaborate your answer below: | |
| Q11 Do you agree that the approach of using the TYNDP assessment of infrastructure needs which is performed for each new TYNDP edition to set the frame for the Project-specific assessment would ensure a focused and pragmatic approach (please elaborate) | Response | |
| | Please elaborate your answer below: | |
| Q12 Would you see some indicators as having limited additional value for CBA analysis? Which ones and for which reason (please elaborate) | Response | |
| | Please elaborate your answer below: | |
| Q13 Would you agree on the relevance of the ADVANCED infrastructure level (please elaborate)? | Response | |
| | Please elaborate your answer below: | |
| Q14 Do you agree with the proposal that the updated CBA methodology should discard the HIGH infrastructure level (please elaborate) | Response | |
| | Please elaborate your answer below: | |
| Q15 Do you think the CBA methodology should keep considering the PCI infrastructure level for the TYNDP assessment (please elaborate) | Response | |
| | Please elaborate your answer below: | |
| 2. A CBA METHODOLOGY WITH AN INCREASED FOCUS ON PROJECT-SPECIFIC CBA | | |
| Q16 Do you support that CBA methodology would include guidance on project grouping (please elaborate)? | Response | |
| | Please elaborate your answer below: | |
| Q17 Would you have any view on criteria to be retained for grouping (please elaborate)? | Response | |
| | Please elaborate your answer below: | |
| Q18 Do you support the proposal of a Project Fiche template (in terms of content, please refer to the version for the project fiche as defined for the 3rd PCI selection process and available at the following link https://www.entsog.eu/public/uploads/files/publications/CBA/2017/ENTSG_G_Project_Fiche_Template.pdf (please elaborate)? | Response | |
| | Please elaborate your answer below: | |
| Q19 Based on the example provided, is there any additional information the project fiche should cover (please elaborate)? | Response | |
| | Please elaborate your answer below: | |
| Q20 Do you support that application of CBA to TYNDP covers performance of PS-CBA (please elaborate)? | Response | |
| | Please elaborate your answer below: | |
| Q21 Do you agree with the publication of PS-CBA results and relevant project information in the TYNDP through a Project Fiche (please elaborate)? | Response | |
| | Please elaborate your answer below: | |
| Q22 Do you agree that the Project Fiche scope identified by ENTSG should have PS-CBA results published (only for projects confirming their previous application for the PCI label as described at page 11 of the supporting document) (please elaborate)? | Response | |
| | Please elaborate your answer below: | |
| Q23 Do you have any comments on the PS-CBA elements proposed for publication as part of TYNDP (please elaborate)? | Response | |
| | Please elaborate your answer below: | |
| 3. A CBA BUILDING ON COMPLEMENTARY MONETISED AND QUANTIFIED BENEFITS | | |
| Q24 Do you agree that the ESW CBA methodology should maintain a Multi-Criteria Analysis (MCA) approach where the monetary analysis is complemented by non-monetary and qualitative assessment (please elaborate)? | Response | |
| | Please elaborate your answer below: | |

| | | |
|---|-------------------------------------|--|
| Q25 What are your views on the current European-wide approach for security of supply (SoS) monetisation followed by ENTSOG (please elaborate)? | Response | |
| | Please elaborate your answer below: | |
| Q26 Would you see benefits in considering a more "country/consumer-based" approach instead of the above mentioned European-wide approach, and if yes, please precise how (please elaborate)? | Response | |
| | Please elaborate your answer below: | |
| Q27 Is there any data source that ENTSOG could consider using for Value of Lost Load (VoLL) and security of supply (SoS) monetisation in the updated CBA methodology and if yes, which ones (please elaborate)? | Response | |
| | Please elaborate your answer below: | |
| Q28 Do you agree with ENTSOG's view that a specific monetisation of CO2 emissions should be done when the capacity brought by projects can be clearly linked to an increase in gas consumption and a consequent reduction of CO2 emissions (please elaborate)? | Response | |
| | Please elaborate your answer below: | |
| Q29 Would you have any suggestion on how to better measure CO2 reductions in mature markets in relation to existing and/or new infrastructure (please elaborate)? | Response | |
| | Please elaborate your answer below: | |
| Q30 Do you support monetisation of CO2 reduction to be based on a Social Cost of Carbon (SCC) rather than on the CO2 market prices (please elaborate)? | Response | |
| | Please elaborate your answer below: | |
| Q31 [If YES in the above question] Would you recommend any specific information source on Social Cost of Carbon (SCC) (please elaborate)? | Response | |
| | Please elaborate your answer below: | |
| Q32 Would you have any specific suggestion on a methodology or proxy for the monetisation of the supply source diversification assessment (please elaborate)? | Response | |
| | Please elaborate your answer below: | |
| Q33 Is there any other element or CBA indicator for which you would have monetisation suggestions (please elaborate)? | Response | |
| | Please elaborate your answer below: | |
| Q34 Do you have any specific view regarding whether and how market modelling is relevant in the framework of infrastructure assessment (please elaborate)? | Response | |
| | Please elaborate your answer below: | |
| Q35 Could you indicate any source for input data required for the implementation of a market model (such as tariffs, supply prices, etc.) (please elaborate)? | Response | |
| | Please elaborate your answer below: | |
| Q36 Would you have any specific views regarding information sources for import prices for the various supply sources and regarding the minimum volumes used to assess market behaviour (please elaborate)? | Response | |
| | Please elaborate your answer below: | |
| Q37 How do you think that import price spread configuration could be further improved (please elaborate)? | Response | |
| | Please elaborate your answer below: | |
| Q38 Consistently with your reply to question 35, what should be the information source for the different supply source prices (please elaborate)? | Response | |
| | Please elaborate your answer below: | |
| Q39 How do you think that LNG diversification could be further improved (please elaborate)? | Response | |
| | Please elaborate your answer below: | |
| 4. CBA FOR INVESTMENT REQUEST AND CBCA | | |
| Q40 Do you agree that CBA methodology as proposed would support promoters by providing them with a common input framework to be used (e.g. demand scenarios) and outputs indicating detailed benefits at country-level as input to promoters' own project-specific CBAs (please elaborate)? | Response | |
| | Please elaborate your answer below: | |
| Q41 Do you have any additional comment or suggestion that has not been covered in previous questions (please elaborate)? | Response | Yes |
| | Please elaborate your answer below: | We support market-based measures to deliver supply security. Before interventionist measures are introduced it must be clearly shown why the market-based measures cannot be used. Initial consideration of whether projects should be eligible for PCI status should be based on supply security criteria only (including source diversification), once it is established that they would not be supported through user commitments. Assessment of the commercial impact of supporting a PCI project should take place subsequently and prior to final regulatory approval. To allow this, there should be adequate information on the existing asset base and derivation of tariffs (under NC TAR), and the cost and effect of the PCI project to enable stakeholders to determine the impact on the allowed revenue of the TSO, and the likely effect on tariffs. Stakeholders should be broadly consulted on market impact of an investment. NRAs should not rely on ENTSOG or TSO projections of market prices. Outside the liquidity window, these are highly uncertain, especially so in most regions where PCI projects are proposed. Where an investment is supported that is not underwritten by the market, the assumptions behind the cost recovery should clearly be shown. |

| 0. IDENTIFICATION & GENERAL INFORMATION | | |
|---|---|---|
| Q1 What is your organisation? | | ENGIE / Global Energy Management |
| Q2 How would you describe your organisation? (Please choose the category which best represents your organisation) | Response | Network user |
| Q3 Confidentiality: ENTSOG intends to publish the results of this public consultation. ENTSOG will disclose only the organisation name but not the participant's personal information (i.e. name and email address). If your response should remain completely confidential, please indicate it below. Otherwise simply skip the following question. | Response | |
| | Please indicate why : | |
| Q4 Do you have a former experience in reading ENTSOG and/or ENTSO-E TYNDPs? | ENTSOG TYNDP 2015 and/or TYNDP 2017 ENTSOG-E TYNDP 2016 None | ENTSOG TYNDP 2015 and/or TYNDP 2017 |
| Q5 Do you have a former experience in reading ENTSOG and/or ENTSO-E CBA methodologies? | Response | Yes |
| Q6 Did you participate in the ENTSOG TYNDP 2017 Stakeholder engagement process? | Response | Yes |
| Q7 Did you participate in the ENTSOG Stakeholder engagement process for the current CBA methodology? | Response | Yes |
| Q8 Do you have experience with the Project of Common Interest (PCI) selection process by the European Commission? | Yes, with the ongoing 3rd PCI selection process Yes, with the 2nd or the 1st PCI selection process No | Yes, with the ongoing 3rd PCI selection process Yes, with the 2nd or the 1st PCI selection process |
| Q9 Why is the ENTSOG CBA methodology valuable for you? | Open-Ended Response | We are interested in an integrated, performant, gas market, that shall deliver the best results for EU in terms of welfare and environmental benefits. This is key for securing gas demand and in the end our industry. PCI projects can be an important asset or issue to achieve this objective : - an asset where it answers effectively a need in the market in a cost efficient way; - an issue if socialization of costs results in increased tariff barriers, and increased costs for the gas energy. |
| 1. SIMPLIFICATION | | |
| Q10 Do you have further proposals for simplification of the CBA methodology document (please elaborate)? | Response | Yes |
| | Please elaborate your answer below: | A great source of complexity of the PS CBA methodology is linked to the modelling of market levels and spreads over the next fifteen years. This is an incredibly complex task, and ENTSOG is not in a position to take some of the needed core hypothesis on market players behaviour, and has been reluctant to consider new infrastructure cross-border tariff impact. The best would be to discard all indicators linked to these computations (EU supply bill, Supply source price dependence and diversification, price convergence...). Market tests that are conducted later in the process will take care of these aspects. Instead, work should be focused where ENTSOG is the most legitimate, and where the market signals are the less efficient : security of supply, and risk of market power abuse. These issues can be dealt with purely with a physical approach of the grid, and don't need a complex modelling of prices. If it's not possible under the current regulation 347/2013, then simplify to the extreme price assumptions and put clear caveats to underline the poor relevance of these indicators. |
| Q11 Do you agree that the approach of using the TYNDP assessment of infrastructure needs which is performed for each new TYNDP edition to set the frame for the Project-specific assessment would ensure a focused and pragmatic approach (please elaborate) | Response | No |
| | Please elaborate your answer below: | TYNDP is indeed a very useful tool to set the frame. Though, TYNDP is just a tool, with all the limits of a standardized modelling. Moreover, ENTSOG, as an association of TSOs, is facing a suspicion of conflict of interests. It will always be in the interest of some ENTSOG members to over-evaluate the needs in order to favour a project. Even if individual persons working at ENTSOG have made a wonderful job, being as transparent as possible, and being extremely rigorous in the application of the rules, the conflict of interest is structural. For both of these reasons, the expression of needs conducted by the Commission in presence of Member States has been an extremely useful exercise. It has clarified and simplified 2017 exercise. This expression of needs shall be the only retained frame. TYNDP should continue to feed this exercise, but decision makers shall remain in position to exercise their role. |
| Q12 Would you see some indicators as having limited additional value for CBA analysis? Which ones and for which reason (please elaborate) | Response | Yes |

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| | | <p>Please elaborate your answer below:</p> | <p>As specified in the answer to Question 10, any indicator based of market prices modelling is not relevant. Market prices modelling done in the TYNDP is at best normative. Trying to model spreads without integrating cross-border tariffs is removing all validity to the results. Secondly, supply costs hypothesis used are not relevant. For pipe producers, purely marginal costs are extremely low, far below observed market prices. A model based on a merit order algorithm, like in power, should in theory use these very low marginal prices, and would give non realistic hub prices. In reality, the gas market is imperfect, and market behaviour of some major market players can completely change the pattern of gas prices in Europe. Prices modelling absolutely need to take some assumptions on these behaviour (and probably requires several scenarios, which would add a new layer of complexity over the exercise). ENTSOG is not in a position to take such assumptions. The subject is so commercially sensitive that no transparent discussion on the subject is possible. Trying to define supply price curves that would give prices coherent with prices observed currently has no theoretical relevance, and zero predictive power. It is not because it is asked in regulation 347/2013 that is more feasible. ENTSOG should acknowledge that it simply can't produce such indicators, or at least should not let decision makers think indicators produced have any relevance or trustworthiness. This does not mean all "modelling-based" indicators should be discarded. Some "modelling-based" indicators do not require prices assumptions. For these indicators though, the question of the treatment of LNG is central. The current assumption, where LNG is considered as a single source, is an enormous bias that must be corrected.</p> |
| <p>Q13 Would you agree on the relevance of the ADVANCED infrastructure level (please elaborate)?</p> | <p>Response</p> <p>Please elaborate your answer below:</p> | <p>Yes</p> <p>it's a more credible approach.</p> | |
| <p>Q14 Do you agree with the proposal that the updated CBA methodology should discard the HIGH infrastructure level (please elaborate)</p> | <p>Response</p> <p>Please elaborate your answer below:</p> | <p>Yes</p> <p>The high infrastructure is not credible. But TYNDP shall allow to assess competing projects. This may require running more scenarios for each PS-CBA, but it's probably more useful than using a generic HIGH scenario.</p> | |
| <p>Q15 Do you think the CBA methodology should keep considering the PCI infrastructure level for the TYNDP assessment (please elaborate)</p> | <p>Response</p> <p>Please elaborate your answer below:</p> | <p>Yes</p> <p>As stated in Question 14, competing projects is an important issue. A required result of TYNDP is to identify which competing projects are kept in the final PCI list. Additional scenarios are probably required.</p> | |
| <p>2. A CBA METHODOLOGY WITH AN INCREASED FOCUS ON PROJECT-SPECIFIC CBA</p> | | | |
| <p>Q16 Do you support that CBA methodology would include guidance on project grouping (please elaborate)?</p> | <p>Response</p> <p>Please elaborate your answer below:</p> | <p>Yes</p> <p>it is needed.</p> | |
| <p>Q17 Would you have any view on criteria to be retained for grouping (please elaborate)?</p> | <p>Response</p> <p>Please elaborate your answer below:</p> | <p>Yes</p> <p>First, costs and benefits must be assessed with the same grouping. This should be obvious, but there should be no room left for misinterpretation. Secondly, grouping shall not prevent identification of competing projects. And project promoters may have conflict of interest. If two projects are possible to complete a supply chain, a project promoter may have more interest in one project than the other, even if it's not the most efficient. As stated in Question 15 and 16, several scenarios may be required, including with different groupings. If such approach is retained, extreme attention should be borne to ensure decision-makers are indeed understanding which costs are providing which benefits.</p> | |
| <p>Q18 Do you support the proposal of a Project Fiche template (in terms of content, please refer to the version for the project fiche as defined for the 3rd PCI selection process and available at the following link https://www.entsog.eu/public/uploads/files/publications/CBA/2017/ENTSO_G_Project_Fiche_Template.pdf (please elaborate)?</p> | <p>Response</p> <p>Please elaborate your answer below:</p> | <p>No</p> <p>Having a project fiche template could be a good idea. Though, as stated in previous questions, some indicators such as the EU supply bill improvement should not be considered reliable at all. And this EU supply bill improvement is nicely highlighted as a key result, with no comments on its reliability, in the Fiche. Similarly, access to supply sources (nb of sources) is presented without saying that the value of this indicator is misleading in many cases because of the modelling of LNG as a single source, which is obviously not correct. If decision makers are provided with the current Fiche, and use it as a basis for their analysis – which is the goal of the Fiche – then it's a deceptive tool, that will be counterproductive.</p> | |
| <p>Q19 Based on the example provided, is there any additional information the project fiche should cover (please elaborate)?</p> | <p>Response</p> <p>Please elaborate your answer below:</p> | <p>Yes</p> <p>Competing projects shall be clearly identified. It should also be specified which benefits correspond to needs identified in the Regional Groups meetings, and which do not.</p> | |
| <p>Q20 Do you support that application of CBA to TYNDP covers performance of PS-CBA (please elaborate)?</p> | <p>Response</p> <p>Please elaborate your answer below:</p> | <p>Yes</p> <p>Yes, with one important condition : if a project does not answer any of the need identified in the Regional Groups meetings, then there is no use performing a PS CBA for this project and this project will not be classified as a PCI.</p> | |

| | | |
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| Q21 Do you agree with the publication of PS-CBA results and relevant project information in the TYNDP through a Project Fiche (please elaborate)? | Response | No |
| | Please elaborate your answer below: | Project Fiche, once corrected from its current defaults (cf. Question 18 and 19), can be a communication tool. It shall not limit information available, nor be considered as a formal decision tool. |
| Q22 Do you agree that the Project Fiche scope identified by ENTSOG should have PS-CBA results published (only for projects confirming their previous application for the PCI label as described at page 11 of the supporting document) (please elaborate)? | Response | No |
| | Please elaborate your answer below: | Transparency on PS-CBA should be reinforced. At least some normative costs information should be included. All stakeholders should be consulted on individual PS-CBA with as much information as possible, and in particular more information on tariff impacts. |
| Q23 Do you have any comments on the PS-CBA elements proposed for publication as part of TYNDP (please elaborate)? | Response | Yes |
| | Please elaborate your answer below: | Cf. previous question. |
| 3. A CBA BUILDING ON COMPLEMENTARY MONETISED AND QUANTIFIED BENEFITS | | |
| Q24 Do you agree that the ESW CBA methodology should maintain a Multi-Criteria Analysis (MCA) approach where the monetary analysis is complemented by non-monetary and qualitative assessment (please elaborate)? | Response | Yes |
| | Please elaborate your answer below: | As stated in previous questions, monetary analysis should be limited to what is technically feasible. Producing a non reliable at all figure is worse than non producing the figure. |
| Q25 What are your views on the current European-wide approach for security of supply (SoS) monetisation followed by ENTSOG (please elaborate)? | Response | |
| | Please elaborate your answer below: | Criteria retained for ENTSOG approach should be aligned with the new regulation on SoS. |
| Q26 Would you see benefits in considering a more "country/consumer-based" approach instead of the above mentioned European-wide approach, and if yes, please precise how (please elaborate)? | Response | No |
| | Please elaborate your answer below: | Building a consensus on a country / consumer-based specific approach would be extremely difficult. ENTSOG may have other priorities. |
| Q27 Is there any data source that ENTSOG could consider using for Value of Lost Load (VoLL) and security of supply (SoS) monetisation in the updated CBA methodology and if yes, which ones (please elaborate)? | Response | |
| | Please elaborate your answer below: | |
| Q28 Do you agree with ENTSOG's view that a specific monetisation of CO2 emissions should be done when the capacity brought by projects can be clearly linked to an increase in gas consumption and a consequent reduction of CO2 emissions (please elaborate)? | Response | Yes |
| | Please elaborate your answer below: | We agree with ENTSOG's view that gas contribution to the reduction of CO2 emissions is at least partly taken into the demand scenarios. Though, potential competition between gas and power projects should be better taken into account (see next questions). |
| Q29 Would you have any suggestion on how to better measure CO2 reductions in mature markets in relation to existing and/or new infrastructure (please elaborate)? | Response | Yes |
| | Please elaborate your answer below: | On CO2 emissions, there is an issue that has not been taken into account. There could be competing power and gas project. For instance, a region requiring investments could be either : S Applied by a new power line with the electrification of final demand; S Applied by a new gas pipe or LNG terminal supplying local gas fired power plant, with the electrification of final demand; S Applied by new gas pipe or LNG terminal, with part of the final demand covered with gas appliances (condensation boilers, gas heat pumps, heat networks, CNG and LNG vehicles...). These different options may have very different results in terms of CO2 emissions. And to compare these options, power network losses are far too important (~50% per 1000 km) to be neglected. This is an ambitious task, requiring a new look at final demand, but currently massive investment is being decided in power lines, with generous assumptions on the electrification of demand, generally without taking into account neither the gas alternative nor the power lines losses. This is a major bias that can hamper the ability of EU to reach ambitious CO2 emissions targets. This may be a far more important task for ENTSOG rather than trying to model market prices over the next 15 years, but finding a common view with ENTSE may not be easier... |
| Q30 Do you support monetisation of CO2 reduction to be based on a Social Cost of Carbon (SCC) rather than on the CO2 market prices (please elaborate)? | Response | No |
| | Please elaborate your answer below: | CO2 market prices doesn't cover externalities of CO2 emissions. On the other hand, SCC combined with a disputable estimation of CO2 reduction should not create a possibility to justify any project. Moreover, as tariff impact is not present in the TYNDP exercise, it means that there is no transparency on who will pay for the PCI project. For instance, if the tariff impact is damaging the competitiveness of gas fired plants against coal power plants, any estimation will be extremely hazardous. Therefore, monetization may not be the best way forward, or should be limited, as ENTSOG is proposing, to areas where gas was not available at all. |
| Q31 [If YES in the above question] Would you recommend any specific information source on Social Cost of Carbon (SCC) (please elaborate)? | Response | |

| | | |
|--|-------------------------------------|---|
| | Please elaborate your answer below: | |
| Q32 Would you have any specific suggestion on a methodology or proxy for the monetisation of the supply source diversification assessment (please elaborate)? | Response | No |
| | Please elaborate your answer below: | As stated in previous questions, ENTSOG is not in position to make credible assumption. Monetization should therefore be avoided. |
| Q33 Is there any other element or CBA indicator for which you would have monetisation suggestions (please elaborate)? | Response | |
| | Please elaborate your answer below: | |
| Q34 Do you have any specific view regarding whether and how market modelling is relevant in the framework of infrastructure assessment (please elaborate)? | Response | Yes |
| | Please elaborate your answer below: | <p>How to take into account cross-border tariffs is a key issue. Existing cross-border tariffs must be included in TYNDP modelling. They deeply impact physical flows, they impact the market shares of non-EU producers. Because of the pancaking of cross-border tariffs, cross-border tariffs will create spreads of several euros across Europe. These spreads can be greater than the supply curve elasticity used in the TYNDP model. They can be of the same order of magnitude of the price shocks used to compute SSPDe and SSPDi. Moreover, tariff impact of each project is also absolutely key in PS CBA. Obviously, a high tariff impact will decrease average use of the concerned infrastructure and limit its benefits. So projects that can achieve benefits with limited tariff impact should be ranked higher. On this key issue, ENTSOG is presenting a two weights approach : as stated above, when estimating the benefits of projects in terms of EU supply bill, ENTSOG is ready to produce and publish without any caveat in a Project Fiche a figure which relevance and underlying assumptions are to say the least extremely disputable. When raising the tariff issue, that is to say the revenue of its members, ENTSOG highlights uncertainties and difficulties, that are valid points, but no more no less than other issues plaguing EU supply bill indicator computation. If grossly simplifying hypothesis can be taken on prices benefits, same can be done with tariffs. Even in the worst case where project promoters and NRAs cannot give any cost or tariff figures, it is possible to take normative hypothesis to make a computation of tariff effect. For instance, it is absolutely possible to consider as an approximation that existing tariffs, that must be published according to the Tariff network code, are kept constant over the TYNDP horizon. ENTSOG is already publishing most tariffs in its transparency platform. For new investment, CAPEX and OPEX costs could be recovered at the concerned cross border IPs. If costs are confidential, a rule of thumb can be defined : 3 M€/km of new pipe (800 or 1200 mm diameter, lower figures could be provided for lower diameter pipe), 100 M€ per compressor station over 10 MW, 10% of the investment costs to be recovered each year as CAPEX and OPEX total expenditures over TYNDP. These figures and rules are of course indicative, and should be discussed and consulted upon. Though, these simple rules can be decided quite quickly and be introduced in the modelling without enormous complexity. Even if these rules are not perfect, they will represent a giant leap in improving TYNDP assumptions. The current approach supposing all tariff are equal to 0, and supposing projects has 0 impacts on cross-border tariffs, is the worst possible hypothesis for the future, where capacities will be marketed on a much more short term basis. We can perfectly understand, and we would even support, the fact that ENTSOG declares it is not in position to compute some indicators. As ENTSOG states, "doing market modelling with only partial market inputs would strongly distort the assessment". But the current position of ENTSOG is not coherent. On the one hand, ENTSOG publishes indicators such as the EU supply bill to support the benefit assessment of project promoters, with extremely partial market inputs (no tariff, perfect market assumptions, strong assumptions on supply sources costs...). Apparently, this is not enough for ENTSOG to "strongly distort the assessment". On the other hand, ENTSOG states that including tariff in the computation, which is an obvious and basic requirement, and that would improve the quality of the assessment, would distort it to the point it would raise questions on the "lack of shared understanding on the role of a market approach". ENTSOG is indeed in a very difficult situation, as tariff is obviously an extremely sensitive topic for its members, but this tariff issue is a central point in the gas market. In the recent Kantor study, tariffs has clearly been identified as the most important issue in the gas market. Explaining that the EU market can be modelled without tariff is an absurdity that undermines the whole credibility of the TYNDP exercise. If EU supply bill is to be computed, then there is no avoiding introducing tariff assumptions, however imperfect they may be. The result will be much more relevant than with the current all tariffs at 0 hypothesis.</p> |
| Q35 Could you indicate any source for input data required for the implementation of a market model (such as tariffs, supply prices, etc.) (please elaborate)? | Response | |
| | Please elaborate your answer below: | Cf. previous question for tariffs. As stated in the previous questions, it will be extremely difficult to find acceptable sources for supply prices over the next 20 years. |
| Q36 Would you have any specific views regarding information sources for import prices for the various supply sources and regarding the minimum volumes used to assess market behaviour (please elaborate)? | Response | |

| 0. IDENTIFICATION & GENERAL INFORMATION | | |
|--|---|---|
| Q1 What is your organisation? | | |
| Q2 How would you describe your organisation? (Please choose the category which best represents your organisation) | Response | Association (please specify type) |
| Q3 Confidentiality: ENTSOG intends to publish the results of this public consultation. ENTSOG will disclose only the organisation name but not the participant's personal information (i.e. name and email address). If your response should remain completely confidential, please indicate it below. Otherwise simply skip the following question. | Response | My response should only be disclosed anonymously |
| | Please indicate why : | |
| Q4 Do you have a former experience in reading ENTSOG and/or ENTSO-E TYNDPs? | ENTSOG TYNDP 2015 and/or TYNDP 2017 ENTSOG-E TYNDP 2016 None | ENTSOG TYNDP 2015 and/or TYNDP 2017 |
| Q5 Do you have a former experience in reading ENTSOG and/or ENTSO-E CBA methodologies? | Response | No |
| Q6 Did you participate in the ENTSOG TYNDP 2017 Stakeholder engagement process? | Response | Yes |
| Q7 Did you participate in the ENTSOG Stakeholder engagement process for the current CBA methodology? | Response | Yes |
| Q8 Do you have experience with the Project of Common Interest (PCI) selection process by the European Commission? | Yes, with the ongoing 3rd PCI selection process Yes, with the 2nd or the 1st PCI selection process No | Yes, with the ongoing 3rd PCI selection process |
| Q9 Why is the ENTSOG CBA methodology valuable for you? | Open-Ended Response | CBA methodology is a key tool for a proper assessment of PCI projects, as any new investment in gas infrastructures may have an impact on the gas transmission tariffs paid by gas end-users. |
| 1. SIMPLIFICATION | | |
| Q10 Do you have further proposals for simplification of the CBA methodology document (please elaborate)? | | |
| | Response | |
| | Please elaborate your answer below: | |
| Q11 Do you agree that the approach of using the TYNDP assessment of infrastructure needs which is performed for each new TYNDP edition to set the frame for the Project-specific assessment would ensure a focused and pragmatic approach (please elaborate) | | |
| | Response | |
| | Please elaborate your answer below: | |
| Q12 Would you see some indicators as having limited additional value for CBA analysis? Which ones and for which reason (please elaborate) | | |
| | Response | Yes |
| | Please elaborate your answer below: | A limited set of indicators should be selected by ENTSOG to ensure CBA analysis performed in an efficient and fluent manner. In this purpose, the 3 "Capacity based" indicators as proposed by ENTSOG seem relevant, whereas the set of "modelling-based" indicators could be weight-lightened : -While both "Remaining flexibility" and "Disrupted demand" indicators are fully from a physical perspective, - Some others should be removed : oThe "Uncooperative Supply Source Dependence" indicator seems of limited value, considering the upcoming reinforced gas SoS Regulation which will impose cooperation between stakeholders through a genuine solidarity mechanism by 2020. Furthermore, the TYNDP is supposed to consider by default a maximum cooperation between Member-States. oIntegrating a "Price convergence" indicator in the CBA methodology seems also not really relevant, as : · It would be impossible to compute/model in a reliable manner, · The question of the impact of gas infrastructure projects on market prices is addressed into the market tests to be proceeded for each project to be submitted by projects promoters, aside /ahead of CBAs & PCIs selection processes. oTherefore, deletion of SSPDe and SPDi price diversification indicators could also be envisaged, for both simplification of processes and reliability of results purposes. |
| Q13 Would you agree on the relevance of the ADVANCED infrastructure level (please elaborate)? | | |
| | Response | Yes |
| | Please elaborate your answer below: | It would better fit the purpose than the "high infrastructure" level which onboards highly hypothetical projects. |
| Q14 Do you agree with the proposal that the updated CBA methodology should discard the HIGH infrastructure level (please elaborate) | | |
| | Response | Yes |
| | Please elaborate your answer below: | cf. answer to Question 13 above. |
| Q15 Do you think the CBA methodology should keep considering the PCI infrastructure level for the TYNDP assessment (please elaborate) | | |
| | Response | No |
| | Please elaborate your answer below: | Inclusion of the PCI infrastructure level seems less crucial than the Advanced infrastructure level. |
| 2. A CBA METHODOLOGY WITH AN INCREASED FOCUS ON PROJECT-SPECIFIC CBA | | |
| Q16 Do you support that CBA methodology would include guidance on project grouping (please elaborate)? | | |
| | Response | Yes |
| | Please elaborate your answer below: | |
| Q17 Would you have any view on criteria to be retained for grouping (please elaborate)? | | |
| | Response | Yes |
| | Please elaborate your answer below: | Grouping of projects should be proceeded with considering the relevant chain of infrastructures involved, down to the connection to the existing transportation network (ex : for an LNG terminal : LNG regasification terminal + transportation capacity). |
| Q18 Do you support the proposal of a Project Fiche template (in terms of content, please refer to the version for the project fiche as defined for the 3rd PCI selection process and available at the following link https://www.entsog.eu/public/uploads/files/publications/CBA/2017/ENTSO_G_Project_Fiche_Template.pdf (please elaborate)? | | |
| | Response | Yes |

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| | Please elaborate your answer below: | A template as frame for elaboration of project fiche will be welcome, as it would ease comparison between competing projects. |
| Q19 Based on the example provided, is there any additional information the project fiche should cover (please elaborate)? | Response Please elaborate your answer below: | |
| Q20 Do you support that application of CBA to TYNDP covers performance of PS-CBA (please elaborate)? | Response Please elaborate your answer below: | |
| Q21 Do you agree with the publication of PS-CBA results and relevant project information in the TYNDP through a Project Fiche (please elaborate)? | Response Please elaborate your answer below: | |
| Q22 Do you agree that the Project Fiche scope identified by ENTSOG should have PS-CBA results published (only for projects confirming their previous application for the PCI label as described at page 11 of the supporting document) (please elaborate)? | Response Please elaborate your answer below: | |
| Q23 Do you have any comments on the PS-CBA elements proposed for publication as part of TYNDP (please elaborate)? | Response Please elaborate your answer below: | |
| 3. A CBA BUILDING ON COMPLEMENTARY MONETISED AND QUANTIFIED BENEFITS | | |
| Q24 Do you agree that the ESW CBA methodology should maintain a Multi-Criteria Analysis (MCA) approach where the monetary analysis is complemented by non-monetary and qualitative assessment (please elaborate)? | Response Please elaborate your answer below: | Yes A Multi-Criteria Analysis approach should be maintained, combining non-monetary criteria and qualitative assessment. A methodology exclusively based on monetary criteria would not give robust results, as some the benefits of projects cannot be really monetized. |
| Q25 What are your views on the current European-wide approach for security of supply (SoS) monetisation followed by ENTSOG (please elaborate)? | Response Please elaborate your answer below: | |
| Q26 Would you see benefits in considering a more "country/consumer-based" approach instead of the above mentioned European-wide approach, and if yes, please precise how (please elaborate)? | Response Please elaborate your answer below: | No Envisaging a country based approach or a consumer-based with different levels of VoLLs would significantly add complexity to ENTSOG's computations. |
| Q27 Is there any data source that ENTSOG could consider using for Value of Lost Load (VoLL) and security of supply (SoS) monetisation in the updated CBA methodology and if yes, which ones (please elaborate)? | Response Please elaborate your answer below: | Yes The value of 600 €/MWh suggested by ENTSOG is an adequate order of magnitude. We also notice that such value is rather close to the Cash-Out mechanism applicable in UK in case of interruption of gas faced by small on-daily metered customers (£ 14/therm). Apart from the value itself, we would emphasize that a VoLL set from the average EU 28 Gross Domestic Product (GDP), compared the gross inland consumption, is not relevant : the concept of VoLL must be set as a marginal price and representative of cost of failure ; considering average values, set on annual figures, does not make sense and does not fit the purpose. |
| Q28 Do you agree with ENTSOG's view that a specific monetisation of CO2 emissions should be done when the capacity brought by projects can be clearly linked to an increase in gas consumption and a consequent reduction of CO2 emissions (please elaborate)? | Response Please elaborate your answer below: | Yes We share ENTSOG's view that is not straightforward to isolate exactly the benefit in terms of CO2 emissions of a gas infrastructure project, even for mature markets. Therefore, we consider that such a monetisation would be very challenging, with a significant risk of low reliability of the results delivered and potential controversial outcomes. Therefore CO2 reduction should not be monetized. |
| Q29 Would you have any suggestion on how to better measure CO2 reductions in mature markets in relation to existing and/or new infrastructure (please elaborate)? | Response Please elaborate your answer below: | No A modelling exercise aiming at measuring CO2 reductions would be a very challenging work and require numerous technical and economic parameters. Furthermore, this modelling exercise, related to the benefits induced by a new gas infrastructure would also require to assess not only the impact on transport tariff, but also gas prices (which would be source of additional complexity). Should the impact of CO2 reductions being investigated, We think that ENTSOG should firstly focus on the potential impact of PCIs projects on the transport exit tariffs paid by gas-fired power plants. Any increase of gas networks tariffs resulting from new gas infrastructures projects may significantly impact marginal cost of CCGTs and OCGTs, thus hampering coal-to-gas switch in power generation ; yet, coal-to-gas switch is one of the main vectors to lower CO2 emissions on most of European energy systems. |
| Q30 Do you support monetisation of CO2 reduction to be based on a Social Cost of Carbon (SCC) rather than on the CO2 market prices (please elaborate)? | Response Please elaborate your answer below: | No Cf. answer to Question 28. |
| Q31 [If YES in the above question] Would you recommend any specific information source on Social Cost of Carbon (SCC) (please elaborate)? | Response Please elaborate your answer below: | |

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|---|-------------------------------------|--|
| Q32 Would you have any specific suggestion on a methodology or proxy for the monetisation of the supply source diversification assessment (please elaborate)? | Response | |
| | Please elaborate your answer below: | |
| Q33 Is there any other element or CBA indicator for which you would have monetisation suggestions (please elaborate)? | Response | |
| | Please elaborate your answer below: | |
| Q34 Do you have any specific view regarding whether and how market modelling is relevant in the framework of infrastructure assessment (please elaborate)? | Response | Yes |
| | Please elaborate your answer below: | We consider that, as a simplified approach, network tariffs to be integrated into the calculations to be performed should be based on the current values, i.e. at the moment of investment decisions. Any attempt to build-up a long term trajectory of market prices would be quite challenging and potentially subject to controversial debates, questioning the relevance of introducing indicators requiring such assumptions. |
| Q35 Could you indicate any source for input data required for the implementation of a market model (such as tariffs, supply prices, etc.) (please elaborate)? | Response | |
| | Please elaborate your answer below: | |
| Q36 Would you have any specific views regarding information sources for import prices for the various supply sources and regarding the minimum volumes used to assess market behaviour (please elaborate)? | Response | |
| | Please elaborate your answer below: | |
| Q37 How do you think that import price spread configuration could be further improved (please elaborate)? | Response | |
| | Please elaborate your answer below: | |
| Q38 Consistently with your reply to question 35, what should be the information source for the different supply source prices (please elaborate)? | Response | |
| | Please elaborate your answer below: | |
| Q39 How do you think that LNG diversification could be further improved (please elaborate)? | Response | Yes |
| | Please elaborate your answer below: | We clearly welcome ENTSG proposal to strengthen the LNG diversification dimension in the review of CBA methodology, as LNG cannot be considered as a unique source of gas supply, wherever the gasification terminals are and whatever the tense situations or scenarios modelled. |
| 4. CBA FOR INVESTMENT REQUEST AND CBCA | | |
| Q40 Do you agree that CBA methodology as proposed would support promoters by providing them with a common input framework to be used (e.g. demand scenarios) and outputs indicating detailed benefits at country-level as input to promoters' own project-specific CBAs (please elaborate)? | Response | |
| | Please elaborate your answer below: | |
| Q41 Do you have any additional comment or suggestion that has not been covered in previous questions (please elaborate)? | Response | |
| | Please elaborate your answer below: | |