

# ACER



Agency for the Cooperation  
of Energy Regulators

## **TYNDP 2013-2022 ACER INPUT**

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**ENTSOG TYNDP WS**

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# We appreciate

- Extensive data collection, supported stakeholders' involvement, meeting deadlines
- Enhanced modelling approach & tool, additional demand situations and multi supply scenarios (e.g. 14-day highest average demand)
- In case of physical congestion, TSOs collaboration required through GRIPs or national plans to identify mitigation measures
- Review of ENTSO-E gas demand for power generation
- Introduction of separate Import route diversification and Import dependence index

A fair partner to all

# Preliminary comments

- Limited evaluation of previous TYNDP implementation. E.g. 50% decrease of FID projects, no justification given
- ACER should be able to check Network Modelling tool in order to evaluate consistency, reliability
- Actual IPs could/should be modelled with their actual “arcs” and real entry-exit zones, and related internal flows checked by TSOs/GRIPs
- Missing indication if there is no need for additional capacity (FID and non-FID projects) proposed by project promoters
- Level of detail needed in modelling: move towards ENTSOE approach?
- Link to investment needs?

## Procedural aspect

- ENTSOG already published a “final” TYNDP before running the consultation process and receiving the ACER opinion – all as *“input to help us shape the future editions”*.
- E.g. ENTSOE amends the draft TYNDP after the consultation process.

## Other comments

- Expected growth of gas demand at 1%/a due to the power generation - last few years evidence is opposite (p. 46): e.g. gas to coal shift, gas only as back up for RES.
- Unconventional production of gas based on TSO data (2bcm in 2022); IEA forecasts 10 bcm in 2020, 75 bcm in 2035 (42% of all indigenous production). Less conservative could be taken.
- In demand graphs (p. 45 and 48), data for some countries (e.g. Bulgaria, Netherlands) missing without proper explanation
- The “disruption of gas transit through Ukraine” should have neutral name, e.g. “Russia/Ukraine disruption”.

# Disclaimer

- The information and views set out in this presentation do not reflect the official position of the ACER
- It is without prejudice to the public consultation and ACER formal opinion on TYNDP 2013-2022

**Thank you for your attention!**



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