

## Consultation document on ENTSOG TYNDP 2015

Through this document, European Network of Transmission System Operators for Gas (ENTSOG) launches a formal public consultation on its Ten-Year Network Development Plan (TYNDP) 2015 published on 16 March 2015.

ENTSOG published TYNDP 2013-2022 in February 2013 and, during the subsequent consultation, received valuable feedback from the stakeholders, including ACER Opinion (September 2013). For the TYNDP 2015, ENTSOG has pursued its stakeholder engagement process organizing Stakeholder Joint Working Sessions from January to May 2014, two public workshops in November 2013 and June 2014 and many bilateral talks. It was a joint process covering both the development of TYNDP concept and the adaptation of the CBA methodology under the TEN-E Regulation. Considering the strong link between TYNDP and CBA methodology, the feedback received through this questionnaire will be factored in both deliverables.

ENTSOG has endeavored to take into account all comments received and encourages stakeholders to stay actively involved in the TYNDP process. Through their response to this public consultation, stakeholders will help ENTSOG to measure in which extent TYNDP 2015 meets their expectations (Part A) and to prepare next edition (Part B).

This consultation will be open today and will end on 5 June 2015. Responses should be submitted by email to the following mail box: [tyndp@entsog.eu](mailto:tyndp@entsog.eu).

This public consultation should not only be taken as a regulatory obligation by ENTSOG but as a necessary step for the continuous evolution of the TYNDP, aiming the fulfillment of reader's expectations.

## 0. Contact details

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### How would you describe your organisation?

<input checked="" type="checkbox"/>	Association (represent European gas industry in wholesale, retail and distribution sectors)
<input type="checkbox"/>	Project promoter
<input type="checkbox"/>	End user
<input type="checkbox"/>	Network user
<input type="checkbox"/>	Trader
<input type="checkbox"/>	Other (please specify)

## ART A – Feedback on TYNDP 2015

### 1. Infrastructure Chapter

In which extent this chapter meets your expectations?					
Poorly:		Sufficiently:	X	Perfectly:	
Which parts of this chapter you particularly appreciate, if any?					
The explanation on project submissions is appreciated, and might be further improved with some additional refinement.					
Which parts of this chapter should be particularly improved in next edition, if any? If yes, do you have any suggestion?					
We propose the following:					
<ul style="list-style-type: none"> <li>▪ It would be useful to illustrate the distinction between those projects that are part of national development plans and those PCI candidates that are outside these national plans (if any).</li> <li>▪ The inclusion of illustrations (maps) of existing networks, then showing the contribution of projects under construction, and finally of FID projects, could be useful.</li> </ul>					

### 2. Barrier to investment Chapter

In which extent this chapter meets your expectations?					
Poorly:		Sufficiently:	X	Perfectly:	
Which parts of this chapter you particularly appreciate, if any?					
The explanation of the views of the various project promoters is interesting.					
Which parts of this chapter should be particularly improved in next edition, if any? If yes, do you have any suggestion?					
This chapter is important, and the strengths and / or weaknesses of existing market support for investments are very relevant.					
We suggest the improvement of the aspects related to the barriers to the investment in gas					

infrastructure, and, in particular, all those factors that can negatively impact the development of new infrastructure projects. In that respect, Eurogas considers that one of the main barriers is that presently EU energy policy is not delivering the right signals regarding the future role of gas in the EU mix, in particular with regard to the power generation sector.

### 3. Demand Chapter - Analysis of historical demand

In which extent this section meets your expectations?					
Poorly:		Sufficiently:		Perfectly:	X
Which parts of this section you particularly appreciate, if any?					
Which parts of this section should be particularly improved in next edition, if any? If yes, do you have any suggestion?					

### 4. Demand Chapter - Definition of scenarios to be used in the Assessment Chapter

In which extent this section meets your expectations?					
Poorly:		Sufficiently:	X	Perfectly:	
Which parts of this section you particularly appreciate, if any?					
Which parts of this section should be particularly improved in next edition, if any? If yes, do you have any suggestion?					
<p>As demand input is a key parameter for the assessment of grid adequacy, providing the maximum information possible on how the scenarios are built would be a useful improvement. Also, some additional "legitimacy" on scenarios choice and range (possible review by the Commission, following stakeholder's consultation?) may be a constructive development of the process. National specificities should be taken into account, but overall EU consistency should nevertheless be achieved.</p>					

### 5. Supply Chapter - Analysis of historical supply

In which extent this section meets your expectations?
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Poorly:		Sufficiently:		Perfectly:	X
Which parts of this section you particularly appreciate, if any?					
Which parts of this section should be particularly improved in next edition, if any? If yes, do you have any suggestion?					

## 6. Supply Chapter - Definition of scenarios to be used in the Assessment Chapter

In which extent this section meets your expectations?					
Poorly:		Sufficiently:	X	Perfectly:	
Which parts of this section you particularly appreciate, if any?					
Which parts of this section should be particularly improved in next edition, if any? If yes, do you have any suggestion?					
The selection of the most relevant data sources is a key factor. Ensuring the overall consistency of these various data sources is also crucial.					

## 7. Assessment Chapter

In which extent this chapter meets your expectations?					
Poorly:		Sufficiently:	X	Perfectly:	
Which parts of this chapter you particularly appreciate, if any?					
A core outcome of the report is "Infrastructure resilience". Physical dependence from supply sources is also very pertinent. The price dependence/diversification assessment, as well as the monetisation is a difficult and tricky exercise.					
The TYNDP should also be able to illustrate the infrastructure gaps for the existing networks and for the					

low infrastructure scenario.

Which parts of this chapter should be particularly improved in next edition, if any? If yes, do you have any suggestion?

### 8. Layout of the report (clarity of the analysis, graphical representation...)

In which extent do you consider that the form of the report support its content?

Poorly:		Sufficiently:	<b>X</b>	Perfectly:	
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Which layout elements you particularly appreciate, if any?

Do you have any specific concerns regarding the layout of the report? If yes, do you have any suggestion?

Some illustrative infrastructure maps could be helpful.

More user friendly annexes display would be appreciated.

### 9. Stakeholder engagement process

Do you consider that ENTSOG offered you sufficient opportunity to be involved in TYNDP process?

Yes:	<b>X</b>	No:	
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Have you taken part in any public workshop or Stakeholder Joint Working Session related to TYNDP 2015?

Yes:	<b>X</b>	No:	
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Which part of the process have you particularly appreciated, if any (public workshop, Stakeholder Joint Working Sessions, bilateral meetings, data collection...)?

Do you have any suggestion regarding how ENTSOG could improve the engagement process?

Increased consultation / interaction with stakeholders for selection of demand/supply scenarios may be useful.

## 10. General comment

What is your overall appreciation of TYNDP 2015?

Very poor		Poor		Average		Good	<b>X</b>	Very good	
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Do you have any additional comment on the extent in which TYNDP 2015 meets your expectations?

## Part B – Preparation of the next edition

### 11. Project maturity

The quality of the assessment of the European gas system depends on the accuracy of the topology of the infrastructure (the way firm capacity interlinked different systems being transmission, storage or LNG terminal).

In case projects do not have a sufficient maturity to precisely identify interconnection with existing or planned infrastructure (interconnection point, capacity increment or commissioning date not clear enough) it affects the ability to assess not only these projects but all the others both at TYNDP and CBA level. In addition the inclusion of such projects in the assessment may give an over-optimistic picture of infrastructure development.

Please provide your preferred alternative to address this situation:

<p>To be considered in the Assessment Chapter a project should be submitted together with a document demonstrating that some prefeasibility study of its interconnection has been carried out (e.g. Memorandum of Understanding, national investment plan...). Such documents should describe the interconnection (which systems are interconnected), the capacity increment and the commissioning date.</p>	<b>Yes</b>
<p>To be considered in the Assessment Chapter a project should be submitted in coordination by the promoters/operators of the interconnected infrastructures (cross-check of submissions through the online portal).</p>	
<p>A specific treatment should be put in place for projects where above conditions cannot be fulfilled. Such projects could be included in the Annex A of TYNDP to enable its eligibility to the PCI selection process but not considered in the Assessment Chapter.</p>	<b>Yes</b>

Other (please describe):

## 12. Evolution of infrastructure projects

Infrastructure projects are continuously evolving and new projects appear between subsequent TYNDP editions. Nevertheless considering changes in projects happening after the submission deadline will induce significant delay in the publication of TYNDP and subsequent PCI selection. For example TYNDP 2015 has been delayed in order to consider the cancellation of South Stream upon request from EU Commission.

Please provide your opinion regarding the introduction of changes in projects:

Only the projects submitted before the deadline should be taken into account. Any changes/additions/cancellations after the deadline should be disregarded.	Yes
As general rule, changes on already submitted infrastructure projects should not be taken into account. Nevertheless in specific cases where the impact of the change is of major relevance, it should be considered along with the delay caused by its implementation.	Yes
If you have answered yes to the previous question, how such potential major changes should be identified and considered (e.g. formal request from the European Commission, agreement within the Regional Groups...)?	
Upon request by the Commission.	
Other (please describe):	

## 13. Assessment of sustainability aspects

In TYNDP 2015, the assessment of the sustainability focuses on the quantification of the RES production and associated gas flexibility as well as the measurement of CO<sub>2</sub> emissions from the power generation sector.

Do you agree with this approach? If not, please explain why	YES/NO
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The TYNDP should mostly assess grid adequacy for SOS and diversification. Sustainability assessment is secondary, and very difficult to quantify.	
Do you see other environmental perspectives that could be addressed in TYNDP assessment?	
If yes, what could be a methodology to address them?	

#### 14. Streamlining of the methodology

The Assessment Chapter from TYNDP derives directly from the CBA methodology. Preliminary feedback has shown a willingness to simplify the assessment but this would imply a downscaling of the CBA methodology to be used in the PCI selection.

Please provide your opinion:

How do you consider the balance between the complexity and the comprehensiveness of the assessment?					
Too complex	<input checked="" type="checkbox"/>	Right balance	<input type="checkbox"/>	Not comprehensive enough	<input type="checkbox"/>
If too complex, which part of the assessment could be removed from the methodology?					
<p>The CBA methodology for assessment of PCIs may be removed from the main report, and put into annexes.</p> <p>In general, the whole set of templates for the collection of the information is too complex. This level of complexity risks compromising the final results deriving from the collection process. Furthermore, in order to guarantee the right results for the elaboration of the plan, we suggest to reduce and simplifying the number of tools.</p>					
If not comprehensive enough, which assessment should be deepen or added to the methodology?					

#### 15. Priority for next edition and long term monitoring of gas quality

What should be the priority direction(s) of improvement for the next edition?
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We recommend that the Assessment Chapter be simplified.

As part of the implementation of the Network Code on Interoperability and Data Exchange, ENTSOG will have to include its first long term monitoring of gas quality in TYNDP 2017.

What are your main expectations regarding this new assessment?