



SUBMISSION TO CONSULTATION ON THE TEN YEAR NETWORK DEVELOPMENT PLAN (TYNDP) 2020 BY ENTSO-E

Climate Action Network (CAN) Europe is Europe's leading NGO coalition fighting dangerous climate change. With over 170 member organisations from 38 European countries, representing over 1.500 NGOs and more than 47 million citizens, CAN Europe promotes sustainable climate, energy and development policies throughout Europe.

DECEMBER 2020

This is CAN Europe's submission to the public consultation of the European Network of Transmission System Operators for Electricity (ENTSO-E) on its Ten Year Network Development Plan (TYNDP) 2020 for electricity.

ENTSO-E consultation questions:

5. Open comments

CAN Europe is worried that the TYNDP 2020 is not yet fully aligned to reaching the Paris Agreement's objective of limiting global temperature rise to 1.5°C. We suggest to assess all available infrastructures and non-infrastructure related solutions in a consistent manner. This would imply that the market and network modelling together with the cost-benefit analysis evolve from the current, electricity sector-based approach to a cross-sectoral optimisation process. The European Commission's Sector Integration Strategy and its Hydrogen Strategy outline key elements of how the interlinkage of sectors can increase environmental and societal benefits. The TYNDP needs to target these benefits by identifying the appropriate energy infrastructure solutions. This means going beyond a separate assessment of pipes and pylons only. The upcoming revision of the TEN-E Regulation is an opportunity to update the modelling methodologies and the cost-benefit analysis to make it fit for sector integration in view of facilitating more ambitious emission reductions.

6. For what purpose do you use the TYNDP?

For information on transmission projects

For information on storage projects

To learn about possible futures of the European energy system

I use TYNDP data for my own research/work

For information on future system needs

For personal knowledge

Other

7. Which TYNDP product(s) did you find most useful?

Options:

"I have not read this document"

"I've had a look. It's not useful for me"

"Somewhat useful"

"Very useful"

TYNDP 2020 Highlights	Very useful
TYNDP 2020 Main Report	Very useful
Online project sheets	I've had a look. It's not useful for me
Insight report on the inertia challenge	I have not read this document
Insight report on smart sector integration	I have not read this document
Pan-European Power System Needs report	I have not read this document
Regional investment plans	I have not read this document
Power System Needs Briefs 2030 per PCI Corridor	I have not read this document
Power System Needs per country (Country factsheets)	I have not read this document
Insight report on system dynamic and operational challenges	I have not read this document

8. Use this field for any further comment on the quality, clarity and length of TYNDP deliverables. How complex is digging in TYNDP documents? How easy was it for you to understand the TYNDP2020?

Regarding the TYNDP 2020 Main Report, we welcome its clarity and the reader-friendly format.

9. What are your views on the 'central scenario' approach? Is the Current Trends sensitivity a relevant exercise to repeat in future TYNDPs?

The assessment of socio-economic welfare achieved by TYNDP 2020 projects under the Current Trend 2030 sensitivity is not complete as it does not integrate the higher external costs (climate damage, environmental damage, health costs) related to the EU's failure to achieve the needed greenhouse gas emission reductions in time.

The Current Trend 2030 sensitivity should not become a scenario or guideline for future energy infrastructure planning as it would send a short-viewed, wrong signal in terms of investment needs.

10. In your view, how do proposed transmission and storage infrastructure projects compare to future system needs? Are the CBA results consistent with the role of the network in achieving the EU Green Deal and in identifying the value of infrastructure projects and the way forward?

In our understanding, the cost-benefit analysis is not yet aligned in a stringent manner with a realistic pathway towards net-zero emissions, be it with a 2040 or with a 2050 horizon. The CBA results neither are complete in the sense of a more holistic cross-sectoral optimisation of all infrastructure and non-infrastructure-related solutions (see submission under 5. Open comments).

We encourage ENTSO-E to strengthen the assessment in view of integrating assumptions and data on demand-side response and prosumer behaviour as well as regards energy efficiency gains and energy savings potentials. It is not clear to what extent solutions such as district heat networks and thermal storage have been taken into account duly.

11. In your view, what is the role of non-TSO transmission projects in the planning of the European network and how do you think this is reflected in this TYNDP?

n/a

12. Any suggestions for the TYNDP 2022?

Please see our feedback under questions 5 and 10 and our submission to the TYNDP 2022 storylines consultation (<http://www.caneurope.org/docman/renewable-energy/3693-can-europe-submission-tyndp2022-storylines-consultation>).