



Public consultation concerning the Revision of the Trans-European Energy Infrastructure Regulation (No. 347/2013)

July 2020

INTRODUCTION:

With the unveiling of the European Green Deal in late 2019, and the emphasis on the move towards smart integration in energy systems, it has become clear that a number of European legislative instruments are in need of amendment in order to take in the broader scope of technologies as well as an increase of renewable energy in the mix.

The Trans-European energy infrastructure regulation (or “TEN-E” Regulation) deals with the interoperability and development of cross-border energy infrastructure, and aims to remove barriers across the continent in order to facilitate interconnected energy markets. The European Commission and the Council have jointly agreed to evaluate both the Connecting Europe Facility (the section of the EU budget dedicated to cross-border energy infrastructure projects, as well as other transnational elements) and the effectiveness of TEN-E.

From EASE’s point of view, the TEN-E Regulation should be significantly revised to better address the challenges and seize the opportunities in light of the European Union’s decarbonisation strategy. Energy storage can play a key role in the future energy system – it is paramount that the TEN-E fully recognise its role.

Please indicate your name:

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Please select the country in which you are based:

- Austria
- Belgium
- Bulgaria
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- Estonia
- Finland
- France
- Germany
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- Italy
- Latvia
- Lithuania
- Luxembourg
- Malta
- Netherlands
- Poland
- Portugal
- Romania
- Slovak Republic
- Slovenia
- Spain
- Sweden
- United Kingdom
- (other) Non-EU country

***Please select what type of organisation you represent:**

- National Regulatory Authority
- National Competent Authority (ministry or other governmental body)
- Transmission system operator
- Distribution system operator
- Energy producer
- Industry
- Telecom company
- Local or regional authority
- Civil society
- Research, academia
- Other (please specify):

Please specify the name of the organisation you represent:

EASE – The European Association for Storage of Energy

Section 1: Effectiveness of the Regulation

The TEN-E Regulation (hereafter: the Regulation) was designed to help overcome some of the key barriers to the development of European wide energy infrastructure. The key questions asked to assess the effectiveness of the Regulation therefore concern the extent to which it has achieved its objectives, and the factors that influenced this.

1. To what extent do you agree with the following statements regarding the TEN-E Regulation's overall impact?

	Completely agree	Agree	Neither agree nor disagree	Disagree	Completely disagree	Do not know
<i>*Contributing to energy market integration throughout Europe</i>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<i>*Achieving an adequate security of supply level</i>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<i>*Contributing to competitiveness in the EU energy market</i>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<i>*Achieving the 2020 climate and energy targets</i>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please explain your answer:

2. Which factors do you think have contributed to the achievement of the objectives? On the contrary, which factors have hindered the achievement of the objectives?

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3. To what extent do you agree with the following statements concerning the financing of energy infrastructure projects?

The Regulation helped to finance energy infrastructure projects by...

	Completely agree	Agree	Neither agree nor disagree	Disagree	Completely disagree	Do not know
<i>*Making financing instruments available to finance PCIs.</i>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<i>*Increasing financing capacities of TSOs (ability to raise debt at a reasonable cost, ability to attract new institutional investors).</i>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
<i>*Providing targeted EU financing under the Connecting Europe Facility.</i>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<i>*Other (please describe)</i>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

Please explain your answer:

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Section 2: Permit-Granting Process:

1. Over time and since 2013, do you agree that the TEN-E Regulation has had a positive impact on shortening the duration of the permit granting procedure for PCIs?

- Completely agree
 - Agree
 - Neither agree nor disagree
 - Disagree
 - Completely disagree
 - Do not know

Please explain your answer:

2. To what extent do you agree that the permit granting in 'one-stop shops' has...

	Completely agree	Agree	Neither agree nor disagree	Disagree	Completely disagree	Do not know
<i>*Reduced complexity of the permit granting process?</i>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
<i>*Increased efficiency in time and costs of the permit granting process?</i>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
<i>*Increased transparency of the permit granting process?</i>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

	Completely agree	Agree	Neither agree nor disagree	Disagree	Completely disagree	Do not know
<i>*Enhanced cooperation between Member States?</i>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
<i>*Would allow addressing challenges related to the permitting of infrastructure for offshore renewable energy projects?</i>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

Please present your views with regards to possible changes which will help improve the process:

Section 3: Public Consultation

1. To what extent do you agree with the following statements about the role of at least one public consultation introduced for PCIs?

The additional public consultation introduced for PCIs has...

	Completely agree	Agree	Neither agree nor disagree	Disagree	Completely disagree	Do not know
<i>*Increased/improved public participation</i>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<i>*Increased awareness of PCI projects</i>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<i>*Increased trust among participants</i>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<i>*Increased public acceptance of PCI projects</i>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
<i>*Led to improvements in the design of the projects</i>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please explain your answers, possibly comparing to other non-PCI projects:

Public Consultations allow stakeholders to provide valid contributions, key to understand how to align PCIs with energy and environmental targets, especially in the context of the European Green Deal. The role of stakeholders and public consultations should be strengthened.

2. To what extent would you agree that the input from the public consultation introduced by the TEN-E Regulation is/was used to guide the further development of projects?

- Completely agree
- Agree
- Neither agree nor disagree
- Disagree
- Completely disagree
- Do not know

Please explain your answer, possibly comparing to non-PCI projects:

EASE believes Stakeholders' inputs to the CBA methodologies, the TYNDP-based assessment of specific projects, and the process of selecting PCIs are not sufficiently taken into account.

3. To what extent do you agree that the requirement for at least one public consultation is enough for increasing transparency and participation in the design and planning of the projects?

- Completely agree
- Agree
- Neither agree nor disagree
- Disagree
- Completely disagree
- Do not know

Section 4: PCI Selection Process

1. To what extent do you agree with the following statements concerning the PCI selection process?

	Completely agree	Agree	Neither agree nor disagree	Disagree	Completely disagree	Do not know
<i>*PCIs selected are the most relevant projects to the fulfilment of the TEN-E objectives.</i>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
<i>*Cost-benefit assessments for the selection of PCIs are using an appropriate methodology.</i>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please explain your answer:

EASE believes that, at the moment, the role of energy storage is not sufficiently recognised in the selection process: among others, storage enables RES integration, links different states and sector, guarantees good utilisation of interconnections, and maintains power quality. The major instrument of project prioritisation (the CBA methodology) is not fully able to assess the value of different energy solutions – in particular, renewable-based solutions. Stakeholders’ and e.g. ACER’s inputs to the CBA methodologies and the process of selecting PCIs are not sufficiently taken into account.

Selection criteria may need to be updated; sustainability criteria shall be introduced; and so should a PCI category for market-based tools (i.e. non-network related PCI flexibility and storage). The current criteria to identify the significant cross-border impact of a project should better designed. The PCI process is also not fit to address small-scale projects that still have a key role in the energy system.

Currently, the too few storage-related selected projects tend to revolve around specific energy storage technologies; failing to recognise that a wide array of solutions exists, providing different services at different timeframes.

2. To what extent do you agree that the role of the different actors listed below is adequate in the selection procedure?

	The role is adequate	The role should be weakened	The role should be strengthened	Do not know
<i>*European Network of Transmission Systems Operators for Electricity and Gas (ENTSO-E/ENTSO-G)</i>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<i>*Agency for the Cooperation of Energy Regulators (ACER)</i>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
<i>*European Commission</i>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<i>*Regional Groups</i>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<i>*National Regulatory Authorities (NRA)</i>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<i>*National Competent Authorities (NCA)</i>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<i>*Transmission systems operators (TSO)</i>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<i>*Distribution system operators (DSO)</i>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<i>*Other stakeholders (NGOs, energy industry, telecom companies, trade associations, finance community, etc.)</i>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

Please explain your answers and, if applicable, elaborate on how the role of actors should change.

ACER's role should be strengthened. ACER should be conferred the powers to approve the ENTSOs' proposal on the CBA methodology, and to request amendments by the ENTSOs, or directly amend it after consulting the ENTSOs. Stakeholders should be further consulted and requested to provide inputs on ENTSO's CBA methodology. ACER should also be conferred the powers to issue binding guidelines on the major infrastructure-related deliverables: the Scenario Development Report, the CBA Methodology and the TYNDP. For such guidelines, stakeholders should be invited to participate in the decision-making process through e.g. public consultations.

Regarding PCIs, the currently yearly frequency of the ACER PCI monitoring report should change to once per PCI list.

3. To what extent do you agree with the following statements concerning the gas and electricity EU-wide Ten-Year Network Development Plans (TYNDPs)?

	Completely agree	Agree	Neither agree nor disagree	Disagree	Completely disagree	Do not know
<i>*The current framework is fit for purpose.</i>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
<i>*The electricity and gas market and network models are sufficiently interlinked (e.g. scenarios and cost-benefit assessment).</i>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
<i>*The current framework does sufficiently match the need for system integration, i.e. the consideration of sectors other than gas and electricity.</i>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
<i>*The TYNDPs do reflect enough coordination with distribution level networks.</i>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
<i>*The relevant actors are involved in the TYNDP</i>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

	Completely agree	Agree	Neither agree nor disagree	Disagree	Completely disagree	Do not know
<i>processes and their respective roles are adequate.</i>						
<i>*The TYNDPs do reflect sufficiently energy efficiency aspects.</i>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

If you disagree, specify what changes you would consider:

The role of flexibility solutions in the energy system should be more recognised. For example, it does not appropriately focus on smart sector integration – key for the decarbonisation. To achieve a truly integrated energy system, energy storage technologies are key drivers for smart sector integration. They can link different energy and economic sectors, thereby increasing the overall efficiency at energy system level while contributing positively to energy security. At the moment, the role of energy storage is not addressed in the TYNDPs in a satisfactory manner.

4. To what extent do you agree that projects of mutual interest with third countries should be included in the revised TEN-E framework?

	Completely agree	Agree	Neither agree nor disagree	Disagree	Completely disagree	Do not know
<i>*Projects of mutual interest, i.e. projects with third country that benefit only one Member State, should remain outside the TEN-E</i>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

	Completely agree	Agree	Neither agree nor disagree	Disagree	Completely disagree	Do not know
<i>framework.</i>						
<i>*Projects of mutual interest should be included in the TEN-E framework...</i>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<i>*...subject to specific eligibility and selection criteria,</i>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<i>*...subject to a specific selection process</i>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<i>*...subject to specific conditions for regulatory measures and access to financial assistance would apply.</i>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please specify your answer:

Section 5: Governance and the roles of different actors

1. To what extent do you agree with the following statements concerning the effectiveness of the PCI monitoring and implementation planning procedures?

	Completely agree	Agree	Neither agree nor disagree	Disagree	Completely disagree	Do not know
<p><i>*Current reporting and monitoring procedures on the PCI progress [popup box: i.e. Activity Status Reports, ACER monitoring reports, Transparency Platform etc.] are sufficient to ensure transparency on PCI development.</i></p>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
<p><i>*PCIs implementation plans and the regular updates ensure timely project implementation.</i></p>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please explain your answer:

To improve transparency, the current yearly frequency of the ACER PCI monitoring report should change to once per PCI; and all TEN-E Regional and Thematic groups should be brought to a European dimension, serving resource efficiency and transparency, improving the process results. Besides, fundamental project information (i.e. commissioning date, capacity increase, project status and cost) shall be made public.

PCIs eligibility period (every two years) should also be changed – it may be a very short period to give signs of stability to projects promoters.

Regulatory misalignment, local objections, and lack of cooperation between Countries have had a negative impact on project implementation.

Section 6: Cross-border allocation

1. To what extent would you agree that CBCA decision processes and outcomes enable effective investment decisions?

- Completely agree
- Agree
- Neither agree nor disagree
- Disagree
- Completely disagree
- Do not know

Please explain your answer, possibly comparing with other means of taking CBCA decisions:

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Section 7: Investment Incentives

1. To what extent would you agree that investment incentives enable effective investments in PCIs?

- Completely agree
- Agree
- Neither agree nor disagree
- Disagree
- Completely disagree
- Do not know

Please explain your answer:

/

Please specify your answer:

/

Section 8: Efficiency of the Regulation

1. To what extent do you agree that the benefits of the provisions in the TEN-E Regulation outweigh the costs?

- Completely agree
- Agree
- Neither agree nor disagree
- Disagree
- Completely disagree
- Do not know

Please explain your answer:

/

2. Can you identify any opportunities to simplify the legislation or reduce unnecessary costs without undermining the intended objectives of the Regulation?

/

3. To what extent do you agree that the current reporting and monitoring procedures on the PCI progress can be simplified and still fulfill their purpose?

- Completely agree
- Agree
- Neither agree nor disagree
- Disagree
- Completely disagree
- Do not know

Please explain your answer:

The current yearly frequency of the ACER PCI monitoring report should change to once per PCI list. PCIs eligibility period (every two years) should also be changed - it may be a very short period to give signs of stability to projects promoters.

Section 9: Relevance of the Regulation

The evaluation of the relevance of the TEN-E Regulation assesses the extent to which the TEN-E Regulation and its objectives appropriately respond to the changes in energy infrastructure needs and in the policy context (such as the climate neutrality objective under the European Green Deal).

1. To what extent do you agree that the following issues are currently well addressed by the Regulation?

	Completely agree	Agree	Neither agree nor disagree	Disagree	Completely disagree	Do not know
<i>*Integration of renewable energy sources into the electricity network</i>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
<i>*Integration of renewable energy sources into the gas network</i>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
<i>*Support of electrification of transport through appropriate grid infrastructure</i>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
<i>*Smart sector integration</i>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
<i>*Energy transition for fossil fuel regions</i>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

	Completely agree	Agree	Neither agree nor disagree	Disagree	Completely disagree	Do not know
<i>*Climate change mitigation</i>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
<i>*Climate resilience of energy infrastructure</i>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
<i>*Improving energy efficiency of the energy system</i>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

If you ticked 'Completely disagree' or 'Disagree': How do you think the Regulation should change to better address these issues?

Improvements to the Regulation are necessary. The Regulation does not sufficiently focus on renewable solutions and the need of a new, smart-energy system able to guarantee security of supply with the objective of achieving decarbonisation. An example: the Regulation's CEF selection criteria focus on electricity storage: they need to be updated to include all energy storage projects, not just electricity storage. Besides, the electricity and gas sectors should not be considered as distinct. Joint planning of electricity and gas infrastructure should be considered, so to fully address the key role of power-to-x, especially in the context of smart sector integration.

2. To what extent would you agree that the TEN-E Regulation has been relevant in supporting the development of the following infrastructure categories?

	Completely agree	Agree	Neither agree nor disagree	Disagree	Completely disagree	Do not know
<i>*High-voltage overhead transmission lines</i>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
<i>*Electricity storage facilities</i>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
<i>*Safety and efficiency installations for electricity</i>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
<i>*Smart grids</i>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
<i>*Transmission pipelines for natural gas and biogas</i>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
<i>*Underground gas storage facilities</i>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<i>*reception, storage and regasification or decompression of liquefied natural gas (LNG) or compressed</i>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

	Completely agree	Agree	Neither agree nor disagree	Disagree	Completely disagree	Do not know
<i>*natural gas (CNG)</i>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
<i>*Safety and efficiency installations for gas</i>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
<i>*Pipelines for crude oil</i>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
<i>*Oil pumping and storage facilities</i>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
<i>*Safety and efficiency installations for oil</i>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
<i>*Dedicated carbon dioxide pipelines</i>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
<i>*Facilities for liquefaction of carbon dioxide and buffer storage</i>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
<i>*Safety and efficiency installations for carbon dioxide</i>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

3. Which of the challenges would you say are most important to address in the field of energy infrastructure today, compared to the situation in 2013? Please select up to 3 most important challenges.

at most 3 choice(s)

- Permit-granting procedures
- Energy efficiency first principle
- Security of supply
- Public opposition to projects
- Other (please specify)
- Energy infrastructure investments
- Energy financing capacity of TSOs
- Regulatory cross-border challenges
- Market fragmentation / market integration
- Greenhouse gas emission reductions / climate neutrality
- Competitiveness of the EU energy market
- Cross-border/regional cooperation
- Digitalisation
- Environmental due diligence in the preparation, permitting and implementation of project
- Energy system integration
- Integration of renewable energy sources
- Commercial viability of projects

4. Which of the challenges would you say are least important to address in the field of energy infrastructure today, compared to the situation in 2013? Please select up to 3 least important challenges.

at most 3 choice(s)

- Permit-granting procedures
- Energy system integration
- Security of supply
- Environmental due diligence in the preparation, permitting and implementation of project
- Energy financing capacity of TSOs
- Regulatory cross-border challenges
- Market fragmentation / market integration
- Energy efficiency first principle
- Public opposition to projects
- Integration of renewable energy sources
- Other (please specify)
- Cross-border/regional cooperation
- Competitiveness of the EU energy market
- Greenhouse gas emission reductions / climate neutrality
- Commercial viability of projects
- Digitalisation
- Energy infrastructure investments

5. Which features do you consider the most important for a project of common interest (PCI) as part of trans-European energy network?

	Important	Important to a large extent	Important to a small extent	Not important	Do not know
<i>*Integration of renewable energy sources into the grid</i>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<i>*Contribution to greenhouse gas emissions reduction / fully consistent with climate neutrality 2050</i>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<i>*Security of supply</i>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<i>*Market integration (e.g. to reduce infrastructural deficits and increase system flexibility)</i>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<i>*Increase competition on the market</i>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<i>*Innovation</i>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<i>*Environmental due diligence in the preparation, permitting and</i>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

	Important	Important to a large extent	Important to a small extent	Not important	Do not know
<i>implementation of project</i>					
<i>*Generation of direct benefits to the local communities</i>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

6. Which of the following infrastructure categories do you consider relevant for the regulatory framework on trans-European energy networks?

	Relevant	Relevant to a large extent	Relevant to a small extent	Not relevant	Do not know
<i>Electricity infrastructure (transmission lines and storage)</i>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<i>Grids for offshore renewable energy</i>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<i>Smart electricity grids</i>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<i>Smart gas grids</i>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<i>Natural gas infrastructure (pipelines)</i>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

	Relevant	Relevant to a large extent	Relevant to a small extent	Not relevant	Do not know
<i>and storage)</i>					
<i>Liquefied Natural Gas (LNG) terminals</i>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
<i>Dedicated hydrogen (H2) networks</i>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<i>Infrastructure for the integration of renewable and carbon neutral gases</i>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<i>Power-to-gas installations</i>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<i>CO2 networks (for transporting CO2)</i>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
<i>Geological storage of CO2</i>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

The TEN-E Regulation presents nine Priority corridors: North Seas offshore grid (NSOG), North-south electricity interconnections in western Europe (NSI West Electricity), North-south electricity interconnections in central eastern and south eastern Europe (NSI East Electricity), Baltic Energy Market Interconnection Plan in electricity (BEMIP Electricity), North-south gas interconnections in Western Europe (NSI West Gas), North-south gas interconnections in central eastern and south eastern Europe (NSI East Gas), Southern Gas Corridor (SGC), Baltic Energy Market Interconnection Plan in gas (BEMIP Gas), Oil supply connections in central eastern Europe (OSC).

The TEN-E Regulation also presents three Priority thematic areas: Smart grids deployment, Electricity highways, and Cross-border carbon dioxide network.

For more information, see: https://ec.europa.eu/energy/topics/infrastructure/trans-european-networks-energy_en?redir=1

7. To what extent do you agree with the following statements concerning priority corridors and thematic areas?

	Completely agree	Agree	Neither agree nor disagree	Disagree	Completely disagree	Do not know
<i>*Priority Corridors reflect the current infrastructure needs</i>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
<i>*Priority Corridors are fit for purpose for future challenges to the energy infrastructure</i>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
<i>*Priority Thematic Areas reflect the current</i>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

	Completely agree	Agree	Neither agree nor disagree	Disagree	Completely disagree	Do not know
<i>infrastructure needs</i>						
<i>*Priority Thematic Areas are fit for purpose for future challenges to the energy infrastructure</i>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please explain your answer:

Although some priorities are well identified, such as the need for a smart grid, EASE believes that a.o. fossil fuel-focused corridors should not be a priority – they hinder the development of a greener energy system.

Section 10: Governance and the roles of different actors

Coherence is about the extent to which the objectives and the implementation of the activities related to the Regulation are non-contradictory (internal coherence), and do not contradict other activities with similar objectives (external coherence). Questions relate to whether there are any internal inconsistencies in the Regulation itself, as well as the degree to which it is coherent with other (EU) initiatives with similar objectives and its situation in the wider EU energy policy field

1. Can you identify any overlaps, inconsistencies within the TEN-E Regulation (including in its measures and objectives)?

- Yes, there are overlaps, inconsistencies or incoherencies
- No, the Regulation is coherent overall
- Do not know

2. Please state your opinion on the following statements regarding the consistency between the TEN-E Regulation and other policies/ initiatives at EU, international, and national level:

	Inconsistencies, or conflicts with the Regulation	Consistent with the regulation	Do not know
<i>*The Clean Energy Package / the Energy Union</i>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
<i>*The European Green Deal / Long Term Strategy for Decarbonisation</i>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
<i>*Trans-European transport networks (TEN-T)</i>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
<i>*EU environmental</i>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

	Inconsistencies, or conflicts with the Regulation	Consistent with the regulation	Do not know
<i>acquis (habitats, water, etc.)</i>			
<i>*EU Digital Strategy</i>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
<i>*EU Industrial Strategy</i>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
<i>*Paris Agreement</i>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
<i>*UN Sustainable Development Goals</i>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
<i>*Commission communication on a stronger and renewed strategic partnership with the EU's outermost regions (COM(2017)623 final)</i>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
<i>*EU neighborhood policy</i>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

Section 11: EU-added value of the Regulation

EU added value concerns the extent to which changes can reasonably be argued to be a result of the EU intervention, over and above what could reasonably have been expected from national actions. Thus, it considers whether and to the extent to which it is justified in terms of the results it brought about compared to what could have been achieved by Member States themselves; and the extent to which the issues addressed by the TEN-E Regulation still require EU intervention (or, in other words, what the consequence of stopping the EU intervention would be).

1. What do you think has been the EU added value of the TEN-E Regulation, compared to what could have been achieved if legislation on energy infrastructure networks only existed at national or regional level?

- Regional cooperation
- Cooperation gains
- Improved regulatory certainty
- Increased transparency
- Increased acceptance of energy infrastructure projects
- Enhanced compliance with environmental requirements
- Greater speed and/or effectiveness of delivery of projects
- Certain projects could not have been implemented otherwise
- Access to financing (e.g. Connecting Europe Facility)
- Other, please specify

Please specify your answer:

/

2. Would the same results have been achieved legislating at national and/or regional level?

	Completely agree	Agree	Neither agree nor disagree	Disagree	Completely disagree	Do not know
<i>*The TEN-E Regulation has achieved more results than what could have been achieved legislating at national and/or regional level.</i>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<i>*The issues addressed by the TEN-E Regulation continue to require action at EU level.</i>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please explain your answer:

Section 12: Final Questions

1. Would you be willing to take part in a follow-up interview to provide further feedback for the evaluation?

Yes

No

2. Do you have any comments, remarks or information regarding this survey that you would like to share?

/

3. Please share any relevant documents and data that would be useful for the purposes of our evaluation.

/

About EASE

The European Association for Storage of Energy (EASE) is the leading member-supported association representing organisations active across the entire energy storage value chain. EASE supports the deployment of energy storage to support the cost-effective transition to a resilient, climate-neutral, and secure energy system. EASE was established in 2011 and currently represents almost 50 members including utilities, technology suppliers, research institutes, distribution system operators, and transmission system operators.

For more information please visit www.ease-storage.eu

Disclaimer

This response was elaborated by EASE and reflects a consolidated view of its members from an energy storage point of view. Individual EASE members may adopt different positions on certain topics from their corporate standpoint.

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