



## *EASE Reply to the European Commission's Public Consultation on the TEN-E Regulation Revision*

*February 2021*



## INTRODUCTION

On 15 December 2020, the Commission [adopted a proposal](#) to revise the EU rules on the Trans-European Networks for Energy (TEN-E) Regulation. The new Regulation aims to contribute to the EU emissions reduction objectives by promoting the integration of renewables and new clean energy technologies into the energy system. It seeks to continue to connect regions currently isolated from European energy markets, strengthen existing cross-border interconnections and promote cooperation with partner countries. It also aims to help timely delivery of cross-border infrastructure by proposing ways to simplify and accelerate permitting and authorisation procedures.

**EASE has prepared a reply to this consultation to promote a TEN-E Regulation in line with the European Union's climate objectives and able to properly recognise the value of energy storage solutions.**



## *Public Consultation*

*Give your feedback on: Trans-European energy infrastructure – revision of guidelines. Intelligent Transport Systems” – Maximum 4000 Characters*

**EASE welcomes the new proposal for the new TEN-E Regulation:** it is a step forward, a piece of legislation more in line with the European Union’s climate objectives, although criticalities are still present.

Firstly, EASE is glad to see that the role of **flexibility** as a tool to improve infrastructure planning for energy system integration is considered, and that the idea of involving users “in the management of their energy usage” as criteria for smart electricity grid projects is present. Still, additional focus on flexibility solutions – in particular **energy storage** – is needed.

The reorganisation of the **priority corridors** excluding natural gas from the available corridors’ categories is positive; and regarding **Projects of Common Interest**, EASE welcomes the fact that sustainability criteria are now present for mutual interest projects. But it must be underlined the risk that fossil fuels projects may still *de facto* be selected. This should be avoided: it should be clarified that pipelines are supported only in the case they transport renewable and low-carbon gases. In addition, EASE believes the lack of introduction of specific PCI categories for market-based tools (i.e. non-network related PCI flexibility and storage) is a missed opportunity. On the other hand, the focus on **small(er) scale** project is key recognition of the importance of different solutions for the energy system.

It is surprising the absence of a **synergy plan with the TEN-T**: this may be a missed opportunity, especially in the context of Alternative Fuels Infrastructure.

Regarding **governance** matters, the decision to further empower ACER is positive. EASE approves ACER being given additional tasks, such as developing framework guidelines for **Scenario Development**. However, there also may be a further need of a joint planning approach for gas and electricity: this is key in the context of system integration. Looking at the **CBA methodology** developed by the ENTSOs, the additional power given to ACER is a positive change: still, ACER should be able to approve the methodology and issue appropriate, binding guidelines. Similarly, EASE also believes further details on how to appropriately **empower stakeholders** and achieve accountability may be needed. On the extensive consultation that ENTSO-E and ENTSO-G should conduct, it is unclear the reason behind only hydrogen stakeholders being mentioned. Moreover, in general, stakeholders should be more comprehensively consulted, being appropriately requested to provide inputs on ENTSO’s CBA Methodology.



In general, some elements may need **clarification**. EASE positively assesses the inclusion of smart grids in the priority thematic areas. However, the practical consequences of these changes are unclear. Similarly, it is also unclear why specific objectives for hydrogen and offshore renewable energy are present, e.g. in the context of performance indicators on page 59 of the Proposal, – while being absent for other solutions.



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#### *About EASE*

*The European Association for Storage of Energy (EASE) is the voice of the energy storage community, actively promoting the use of energy storage in Europe and worldwide. It supports the deployment of energy storage as an indispensable instrument within the framework of the European energy and climate policy to deliver services to, and improve the flexibility of, the European energy system. EASE seeks to build a European platform for sharing and disseminating energy storage-related information and supports the transition towards a sustainable, flexible and stable energy system in Europe.*

*For more information please visit [www.ease-storage.eu](http://www.ease-storage.eu)*

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#### *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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