



# EASE reply to European Union Agency for the Cooperation of Energy Regulators (ACER)'s Public Consultation – “2024 Ten-Year Network Development Plan (TYNDP) Framework Guidelines”

October 2022



## INTRODUCTION

The process has commenced for the current cycle of the Ten-Year Network Development Plan, the pan-European electricity infrastructure development plan, developed jointly by ENTSO-E and ENTSO-G. Following the revision of the Trans-European Networks for Energy Regulation, ACER has a role in developing framework guidelines to set the boundaries of the process for the ENTSOs. EASE welcomes this public engagement and opportunity to submit comments to ensure a fair development process.

**EASE – The European Association for Storage of Energy calls for the need for the ENTSOs to work jointly in developing scenarios, to take into consideration all climate and energy targets (binding and non-binding), and to consult energy storage throughout this cycle.**



## Public Consultation

Give your feedback on:

9.) The proposed criteria to ensure robust objective-driven scenario development (Section 3 of the draft Guidelines).

EASE – The European Association for Storage of Energy believes a central “most likely” scenario is a good practice to follow, and useful to give investors signals, however basing it solely on NECPs is a risk as certain countries have not updated plans to reflect the latest agreed targets for 2030.

The ENTSOs should agree jointly on which additional drivers to use to make other scenarios in order to avoid the dual opposing scenarios that have been seen in the past. Massively opposing scenarios are of little benefit, and simply allow each ENTSO to create its own scenario and not work jointly. The revised TEN-E emphasises the need for the ENTSOs to work together.

When 2030 climate and energy targets are to be considered, this must reflect all targets, including those to be agreed in the Renewable Energy Directive III. Not only the raised renewable energy target of 45%, but potential non-binding targets should be considered such as the 5% energy storage targets, and 5% innovative technology target.

In paragraph (31), energy storage should be listed as topic that the ENTSOs must detail how specific assumptions are included in the scenarios.

10a.) The proposed criteria to ensure a transparent, inclusive and streamlined development process, focusing on the stakeholder engagement requirements (Section 4 of the draft Guidelines, recitals (42)–(48)).

Energy storage must be included in Stakeholder Reference Group. The TEN-E clarifies that actors involved in the electricity market and demand response would be part of the group, which would include energy storage. This should be clarified so it is not ignored.

11.) The process for ensuring independent scrutiny of inputs, assumptions and methodologies (Section 5 of the draft Guidelines).

Where PRIMES is used for scenarios, data must be available as much as possible. This modelling is a “black box”, with little public understanding of how it operates. In general,



EASE would prefer alternative models to be used as references and open-source modelling.



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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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