



## SUBMISSION TO CONSULTATION ON THE TEN YEAR NETWORK DEVELOPMENT PLAN (TYNDP) 2020 BY ENTSOG

*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.*

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**This is CAN Europe's submission to the public consultation of the European Network of Transmission System Operators for Gas (ENTSOG) on its Ten Year Network Development Plan (TYNDP) 2020 for gas.**

### ENTSOG consultation questions:

#### General information

6. Do you have a former experience in reading ENTSOG and/or ENTSO-E TYNDPs?
  - a.  ENTSOG TYNDP 2018
  - b.  ENTSO-E TYNDP 2018
  - c.  ENTSOG's or ENTSO-E's previous TYNDP editions
  - d.  None
7. Did you or someone on behalf of your organization participate in the ENTSOG TYNDP 2020 Stakeholder engagement process?
  - a.  Yes
  - b.  No
8. What are the TYNDP elements most valuable for your activity? [tick boxes – multiple choices possible]
  - a.  Joint ENTSOG and ENTSO-E Scenarios
  - b.  Infrastructure Report: Information on infrastructure projects
  - c.  System Assessment Report: Identification of the infrastructure needs
  - d.  System Assessment Report: Assessment of TYNDP projects
  - e.  System Assessment Report: TYNDP simulation results provided in Annex E
  - f.  Information on the TYNDP modelling (Annex D)

- g. Long-term Gas Quality Monitoring Outlook
  - h. Other: please specify [free text – 500 characters max]
9. TYNDP 2020 is composed of 3 main reports (Scenarios, Infrastructure and System Assessment) and 5 annexes. Is TYNDP 2020 easy to read and navigate through?
- a. very easy
  - b. easy
  - c. X difficult
  - d. very difficult
10. Are the maps, graphs and tables easy to understand?
- a. very easy
  - b. X easy
  - c. difficult
  - d. very difficult
11. ENTSOG published all the TYNDP data on its website. Has it been useful to you?
- a. X Yes
  - b. No
12. Any suggestion on how to improve the TYNDP readability? [free text – 500 characters max]
- n/a
13. ENTSOG introduced a number of new elements in TYNDP 2020. Please indicate which one(s) you find the most valuable?
- a. New project category related to the Energy Transition (ETR category), and their assessment as part of the sustainability chapter
  - b. X A dedicated TYNDP website
  - c. X New visualization platform for TYNDP results
  - d. the introduction of the Existing infrastructure level to assess the capability of the already existing infrastructure
  - e. The publication of the cost-benefits analysis of all PCI applicant project
  - f. Other, please specify [free text – 500 characters max]

## Infrastructure

14. ENTSOG developed guidelines and selection criteria for projects submitted to TYNDP 2020 ([Practical Implementation Document](#)). How the selection criteria could be further improved? [free text – 500 characters max]
- n/a

15. For the first time, ENTSOG collected projects related to the Energy Transition (ETR project category). This project collection is meant to improve the transparency and provide information on the energy transition from an infrastructure perspective, including the renewable generation and decarbonisation capacities. Do you find this approach relevant in the context of the recent European strategies (Green Deal, Hydrogen and Energy System Integration)?

- a. Yes
- b. No X

16. How can it be further improved? [free text – 500 characters max]

It is not clear how the new ETR category substantiates its contribution to emission cuts and benefits for renewable energy integration. We miss a consistent methodological framework for the evaluation of such projects that evaluates interlinkages and redundancies with electricity and heat networks. All available infrastructures and non-infrastructure solutions should be assessed on par. This implies the split ENTSOs modelling and CBAs evolve towards cross-sectoral optimisation.

17. ENTSOG introduced the Existing infrastructure level to assess the existing infrastructure, as a first step, before assessing the additional impact of FID and Advanced (or PCI) projects. Do you find it valuable?

- a. X Yes
- b. No

18. Is there further information on projects that you would like to see reflected in TYNDP? [free text – 500 characters max]

In its decision of 19 November 2020, the EU Ombudswoman confirmed a complaint regarding the missing climate and sustainability assessments for fossil gas PCIs. The simplified approach in ENTSOG methodologies to consider fossil gas projects generally as climate friendly due to switching from coal, is not sufficient. The TYNDP should disclose information on the sustainability of projects such as the estimated GHG emissions during a project's lifetime and other environmental impacts.