



SUBMISSION TO CONSULTATION ON THE ENTSO-E ANNUAL WORK PROGRAMME 2021

Climate Action Network (CAN) Europe is Europe's leading NGO coalition fighting dangerous climate change. With over 160 member organisations from 38 European countries, representing over 1.700 NGOs and more than 40 million citizens, CAN Europe promotes sustainable climate, energy and development policies throughout Europe.

CAN Europe's submission focuses on the work strands that are currently covered by CAN Europe, namely the system development under the Ten Year Network Development Plan (TYNDP) and transparency issues.

We are in a climate emergency. Swift emission reductions are indispensable to limit temperature rise to 1.5°C, in line with the Paris Agreement. The EU is currently discussing an increase of the level of ambition of its climate target. European energy infrastructure urgently needs to be prepared for a massive increase of renewable energy generation besides the mobilisation of energy savings potentials. ENTSO-E's annual work programme for 2021 thus should make a **Paris Agreement compatible energy infrastructure planning** a priority. The draft work programme however does not refer to this challenge.

CAN Europe also misses a clear commitment to increasing the **variation of TYNDP scenarios**. While we welcome ENTSO-E's willingness to include a carbon budget into the modelling, we are very concerned about the current set of scenarios. These scenarios do not suggest realistic pathways to reach the Paris Agreement's 1.5°C target. They are neither in line with the promises of the European Green Deal nor with a timely achievement of net zero emissions. In 2021, ENTSO-E should assess a **100% renewable energy pathway towards net zero emissions in 2040** as a part of its scenario building (see also [CAN Europe submission to the consultation on the TYNDP scenarios, January 2020](#), and the [CAN Europe and EEB letter on TYNDP scenarios, February 2020](#)).

We fully agree that a **multi sectoral planning** is necessary. A cross-sectoral optimisation of supply, demand and all infrastructure options should be enhanced in order to be able to identify the most cost-efficient solutions (see also CAN Europe comment on ENTSOs' interlinked model, July 2020). The value of each project should be compared with competing projects from all the sectors that it impacts. CAN Europe reiterates that a transparent **Cost Benefit Analysis** with a clarified sustainability criterion is still missing. This needs to become one of the priorities of the annual work programme 2021 (see CAN Europe submission to the consultation on the annual work programme 2020, November 2019). CAN Europe supports ENTSO-E's efforts to improve access to data as well as the planned further improvements of its Transparency Platform. We suggest that ENTSO-E generally makes the attribution of an **open licence** to all its publications a priority in its annual work programme 2021.