

Response ID ANON-WDAK-RSAE-J

Submitted to **ENTSOs 2020 TYNDP Scenarios Consultation**

Submitted on **2020-01-13 15:58:06**

Introduction

1 What is your name?

Name:

UPRIGAZ

2 What is your email address?

Email:

uprigaz@uprigaz.com

3 What is your organisation?

Organisation:

UPRIGAZ is the main association gathering natural gas and electricity suppliers in France

Stakeholder Engagement

4 Are you satisfied with the format and level of explanation?

Satisfied

If unsatisfied, please comment (140 characters):

5 Are you satisfied with the level of stakeholder engagement during the joint ENTSO scenario building process?

Satisfied

If unsatisfied, please make suggestions how we can improve for the next process (140 characters):

6 Among the different engagement options, rank them in the order of your preference (rank from 1 to 4)

Interaction - Physical Workshops:

1

Interaction - Webinars:

4

Interaction - Consultations:

2

Interaction - Bilateral Discussions:

3

Clarity of Reports

7 Are you satisfied with the format and the level of explanation provided in the Scenario Main Report?

Satisfied

If unsatisfied, please comment (140 characters):

8 Are you satisfied with the format and the level of explanation provided in the Methodology Report?

Satisfied

If unsatisfied, please comment (140 characters):

9 Are you satisfied with the format and the level of information provided in the Visualisation Platform/Data set?

Satisfied

If unsatisfied, please comment (140 characters):

European Targets and Storylines

10 The ENTSOs scenarios are built to be compliant with EU-28 2030 and 2050 targets as a minimum standard. Do you agree that ENTSO scenario should be built with a minimum standard?

Yes

If no, please comment why.:

Minimum standard comment:

11 The ENTSOs introduced National Trends as the central policy scenario. National Trends is aligned with the draft member state National Energy Climate Plans (NECPs). Do you agree that member state NECPs should be used to develop National Trends?

Yes

If no, please comment why:

12 Do you agree that the scenarios are consistent with their respective storyline central matrix?

Yes

If no, please comment why:

13 Scenario diversity is essential when it comes to the assessment of the future gas and electricity infrastructure needs. In your opinion do the 3 scenarios cover a broad enough range of plausible pathways aiming to achieve 2050 EU-28 targets?

No

If no, please comment why:

The new EU Parliament has declared climate urgency and required a set of proposals from the EU commission to achieve carbon neutrality before the 2020 target date.

The potential consequences of such a scenario should be evaluated in the TYNDP 2020, in particular on the price of electricity and the energy affordability of EU consumers, and also on the risk of decommissioning of gas and LNG infrastructures that we think as essential for the success of a viable energy transition in Europe.

UPRIGAZ considers as essential for the energy security of supply to maintain an energy mix with a sufficient share of natural and decarbonized gas, in particular to face a big demand of electricity during the winter season. UPRIGAZ also thinks that ENTSOs are well placed to evaluate such consequences.

UPRIGAZ also stresses the fact that in the event the path towards the development of renewables is slower than expected, having maintained in service a sufficient capacity of gas infrastructures constituted a systemic insurance which can mitigate such difficulties as well as the risks attached to the intermittence of renewable resources.

Paris Targets and Decarbonisation

14 The COP21 Paris Agreement and IPCC Special Report 1,5°C provides evidence on the need for a carbon budget in the global effort to tackle the climate change. This is the first time ENTSOs have developed a carbon budget approach for the Distributed Energy and Global Ambition scenarios. Do you agree that using a carbon budget approach to scenarios is appropriate?

Yes

If no, please comment why:

15 The Distributed Energy and Global Ambition scenarios aim at achieving a carbon-neutral EU-28 economy by 2050. Do you think the scenarios are helpful in identifying / assessing those challenges?

Yes

If no, please comment why (140 Characters):

What do you believe is the 1st biggest challenge? (50 Characters):

Energy affordability (EU industry and consumers)

What do you believe is the 2nd biggest challenge? (50 Characters):

A sufficient contribution of gas to ensure a resilient energy mix

What do you believe is the 3rd biggest challenge? (50 Characters):

Promoting an EU wide investment effort in favour of decarbonized gas

16 The ENTSOs scenarios have for the first time used a total energy balance tool to build the scenarios. The energy balance method allows a holistic overview of the future EU-28 energy pathways in a comprehensive and consistent manner. The total energy model provides an opportunity to capture the impact of sector coupling between the gas and electricity sectors. Do you agree that the ENTSOs'

approach to sector coupling is sufficiently captured?

No

If no, please make suggestions on improvements that could be addressed in the next process (140 Characters):

UPRIGAZ welcomes the approach of ENTSOs of a comprehensive TYNDP for gas and electricity and the evaluation of the 3 scenarios on infrastructures that are more and more coupled.

However, we think that the issue of winter peak shaving of electricity demand and the capacity of gas to alleviate electricity production and transmission infrastructure investments should be more explicitly addressed in te TYNDP, both in terms of security of supply and of cost for consumers.

17 The ENTSOs scenarios use external data on LULUCF (Land Use, Land Use Change and Forestry) to provide input to the scenarios on carbon sinks. The scenarios also consider the development of “game-changer” net negative emission technologies, such as, Bioenergy Carbon Capture and Storage (BECCS). Do you agree that including external LULUCF and net-negative emission technologies within the scenario is appropriate?

Yes

If unsatisfied, please comment (140 characters):

18 To reach carbon neutrality by 2050, ENTSOs scenarios consider the deployment of Carbon Capture and Sequestration (CCS) for pre- and post-combustive processes. Do you consider CCS is an appropriate technology within the scenarios?

Yes

If no, please comment why:

19 The Distributed Energy and Global Ambition scenarios consider different technology pathways to decarbonisation. The Distributed Energy is a scenario where renewable technology is deployed in a decentralised way. The Global Ambition scenario assumes a more globalised and centralised approach to development of renewables. One impact is the potential for more energy imports from outside of the EU. Do you agreed with how renewable energy deployment is applied and?

Ye

If no, please comment why:

Futher Use of Scenarios

20 As a stakeholder, do you intend to use our scenarios, or do you see opportunities for further use of these outside the TYNDPs?

Yes

If yes, how would you consider them?:

UPRIGAZ is in favor of the global ambition scenario, which better fosters synergies between gas and electricity. It will therefore constitute an element for consideration in the long term strategy of its members. Furthermore and in line with our response to Q13, the global ambition scenario ensures the most realistic scenario to mitigate the risks associated both to the development rate and the intrinsic intermittence of renewable resources.

Any further Comments?

21 If you have any further comments on the scenarios, please state them here.

Further comments:

22 I want my answer to remain anonymous. If you tick this box, we will publish your comments but we will not publish your name and organisation.

I want my answer to remain anonymous :

No

23 I want my answer to remain confidential - If you tick this box, we will not publish your answer to this consultation

I want my answer to remain confidential:

No

24 I agree to ENTSO-E's Consultation Hub privacy policy

I agree to ENTSO-E's Consultation Hub privacy policy:

Yes