

ENTSO-E Annual Work Programme 2020 - Treatment of responders' submissions

This note contains a summary of remarks received during the public consultation organised from 17 October to 15 November 2019 and indications on how they have been taken into consideration in the version of the Annual Work Programme 2020 as submitted to ACER.

The remarks of stakeholders emphasize the need for implementation to be a priority, need for transparency, need for stakeholder interaction on legally mandated tasks, need for a focus on TSO-DSO interaction including stakeholder interaction on the latter. ENTSO-E's efforts on stakeholder interaction, such as through the independent Advisory Council, are widely recognized and welcomed. It is further stressed by stakeholders that ENTSO-E's TYNDP has to underpin the clean energy transition in line with the COP21 objectives.

Page number / Section	Stakeholder	Respondents' feedback	ENTSO-E's views
5) Please indicate if any parts of the report are unclear or need to be further elaborated. Please explain your views.			
Page 6	T&D Europe	Under monitoring implementation of Network Codes we suggest adding an evaluation of experiences with the implementation of the first generation of Network Codes. Particular focus should be given to differences in national implementation both with regard to content and timing the question, whether there are learnings for process improvement for future Network Codes.	Learnings from network codes have been taken into account in the clean energy package's ACER regulation with direct approvals by ACER. Moreover, the mandate to write network codes will no longer lie alone with TSOs as e.g. a cybersecurity code or a demand side flexibility code would have to be written by several participant groups. We have created active libraries to allow TSOs to upload national documents related to the implementation of NCs. Comparisons can be made based on these publicly available documents
Page 18	T&D Europe	In the CEP implementation chapter, the legal reference to Smart Grid indicators should be added: "Furthermore, the ENTSO-E, together with the associations representing distribution network operators, will proactively develop and propose to the European Commission and National Regulatory Authorities a set of smart grid indicators which is foreseen in the Electricity Directive, art 59.1 (I). This would clarify the legal base for external readers.	<u>Remark duly taken into consideration. The legal reference to the Electricity Directive, art 59.1 (I) has been added to the draft AWP 2020.</u>
6) Please indicate what you believe should be ENTSO-E's highest priorities for 2020 and explain why			

<p>Climate Action Network (CAN) Europe</p>	<p>Energy infrastructure is the backbone of Europe’s energy transition. Against the backdrop of the ongoing climate crisis, it must not only anticipate but also facilitate the massive increase of renewable energy capacities. Aligning ENTSO-E’s annual work programme to the 1.5°C Paris Agreement target would entail a truly holistic assessment of all options available for enhancing energy infrastructure’s readiness for the speediest pathway towards net zero emissions.</p> <p>A one-dimensional approach looking on electricity infrastructure only or on gas infrastructure only will not provide an adequate answer to this challenge. The massive increase of renewable capacities requires a cross-sectoral optimisation of all infrastructures, technologies and services to allow for quick emission reductions and uptake of renewables. ENTSO-E’s work programme should strive to ensure infrastructure neither becomes a bottleneck nor deepens Europe’s dependency on fossil fuels. CAN Europe against this backdrop suggests making a transparent Cost Benefit Analysis with a clarified sustainability criterion one of its priorities in the Annual Work Programme 2020.</p>	<p>ENTSO-E agrees with the need for delivering on the Paris Agreement targets and even more so with the need for a holistic approach in energy. The interlinked model, done together with ENTSOG, is doing justice to this need, as well as the stakeholder interaction ahead of the TYNDPs, ensuring their input on such matters as e-mobility, storage, demand side response etc. What is more, the NECPs, to the extent possible, provide important input the national developments scenario of TYNDP 2020. The electricity part of ENTSOs scenarios built in 2019 have been aligned to NECPs in September 2019 to the extent possible. We agree with your statement that power networks have to drive the energy transition, ensuring that RES are integrated and the overall transition is progressing in a cost efficient and system secure manner.</p>
<p>Estabanell Energia, S.A</p>	<p>In terms of transparency, the prioritization of the Operational Planning Data Environment and common Grid Model. And the interoperability and scalability.</p>	<p>The full implementation of CGM and OPDE is of crucial importance for ENTSO-E. Being legal mandates, these deliverables have indeed been included in the chapter related to “implementation”. As stated in the draft AWP 2020, implementation of legal mandates is a priority for ENTSO-E.</p>
<p>smartEn</p>	<p>One of ENTSO-E's highest priorities should be dealing with structural grid issues. The current programme does not include any mention on how ENTSO-E will deal with the issues that rise from long-lasting frequency deviations and deterministic frequency deviations. While we welcome ENTSO-E’s report “Continental Europe Significant Frequency Deviations – January 2019”, no clear follow-up has been included in the workplan to address these issues, especially system failures for which the TSOs are themselves responsible.</p>	<p>ENTSO-E agrees structural grid issues are very important. They are addressed in the new CEP provisions, and ENTSO-E, focussing on implementation in the next years to come, will thus address them through this implementation in addition to the current actions undertaken, and communicated, as such as the one you refer to. RCCs will play an important role in addressing structural grid issues, with more services to be developed in the next two years.</p> <p>Additionally, ENTSO-E's priorities on developing the future power system in line with the EU ambition for decarbonisation are reflected in the ENTSO-E “Vision on Market Design and System Operation towards 2030”,</p>

		<p>Additionally, ENTSO-E's priorities should focus on developing the future power system in line with the EUs ambition for decarbonisation.</p>	<p>as well as in the ‘Global Ambition’ and ‘Distributed Energy’ joint TYNDP 2020 Scenarios.</p>
	<p>T&D Europe</p>	<p>T&D Europe believes ENTSO-E highest priorities in 2020 should be the implementation of the Clean Energy Package, in particular the electricity market design legislation related to the network interface. We welcome the emphasis given on cooperation between TSOs and DSOs entities in networks infrastructure planning and especially in developing a common view on future functionalities of smart grids and their deployment. In this regard, we are looking forward to the proposal of smart grids indicators and are ready to actively contribute to the discussions.</p>	<p>ENTSO-E agrees. Board and Assembly have already decided on this reprioritisation towards implementation. While the network interface - TSO-DSO – is of paramount importance ENTSO-E will indeed also have to deliver on the many other new tasks, such as Resource Adequacy etc. We are looking forward to interacting with TD Europe on such deliverables as the Smart Grid Indicator: while NRAs are in charge we believe that a European approach is important here as well.</p>
	<p>SolarPower Europe</p>	<p>1) The <u>implementation of the grid connection codes, in particular the Requirement for Generators (RfG) code</u> in member states is critical to ensure a successful internal market for energy. It is therefore important that ENTSO-E ensures that the right information on the pan-European implementation of the code is accessible to the industry and that further work is done on the harmonisation of compliance procedures, in coordination with the existing initiatives in CEN-CENELEC.</p> <p>2) The <u>implementation of the Clean Energy Package</u> should also be a key priority for ENTSO-E. The implementation of the new provisions on congestion management rules and on the European adequacy assessment and capacity mechanisms, as well as the development of the new network codes (notably on cybersecurity and interoperability and data) will be particularly important.</p> <p>3) Broadly, as Europe prepares the energy system in 2030 through the NECP process, <u>the modernisation of grids to integrate large amounts of renewables will be critical</u>, and requires a deep engagement with the renewable energy industry. In that regards, ENTSO-E has a specific role in fostering the exchange of good practices between countries with high shares of renewables and an established link between the</p>	<p>1) ENTSO-E recognizes this and has been working over the last three years to provide enough transparency in national implementation processes. Active Library, monitoring excel file, Issue Logger and interaction through the GC ESC, public workshops and public consultations have been the public means to maintain an active dialogue with the relevant stakeholders and shed light in national processes and selection of proposals. Although challenging, since the implementation process is not governed by ENTSO-E or the TSOs (in most cases is NRAs or/and Ministries) there has been a great deal of information and visibility at national level. We are happy to go even further and appreciate your direct exchange with our team in charge (ioannis.theologitis@entsoe.eu). Work continues through the monitoring activities of ENTSO-E.</p> <p>Regarding the harmonization of compliance, this is a topic that is currently high on the agenda of ENTSO-E - since it is equally important for system users and system operators. ENTSO-E is in close contact with the corresponding teams at CEN-CENELEC liaising and is also part of TC8X-WG3 working on 50549-10 standards relevant for the compliance.</p>

		<p>renewable industry and the grid operators, and other countries. The joint work with DSOs, through the new DSO body, will be essential. In particular, renewable energies and clean technologies such as storage could support the grid integration of renewables, by providing balancing services, and further ancillary or “grid forming” services. SolarPower Europe has published in this regards a report on “Grid intelligent solar” (https://www.solarpowereurope.org/wp-content/uploads/2018/12/4018_SPE_Grid_Intelligent_Solar_report_05_hr.pdf), that maps how innovative solar projects could provide ancillary services. ENTSO-E should engage with the renewable energy industry to explore the possible benefits of these innovative projects and integrate them in their network planning.</p> <p>In addition, exchange of best practices on grids regulatory frameworks, such as grid planning methodologies, grid connection procedures or grid tariffs, could be conducted together with the renewable energy industry and the Distribution System Operators.</p>	<p>2) Indeed CEP implementation is ENTSO-Es top priority and in particular those that you mention. ENTSO-E is contributing to the new Cybersecurity Network code and undertaking a gap analysis as to assess whether a new network code on demand side management is really needed, or if updates on existing tools could also deliver the same results in a more efficient way.</p> <p>3) We believe that continuous dialogue among all relevant stakeholders and active engagement from all is imperative, not only for 2030 but 2050. ENTSO-E interacts with stakeholders and for a wide range of topics on daily basis. Consultations, workshops, joint reports, committees, forums, expert groups etc...provide opportunities for effective discussions and for the industry to share all relevant information. Recent examples with experts groups e.g. for storage and grid forming (topics that have been quoted by SolarPower Europe) have shown that those discussions are necessary and improve our results. The independent Advisory Council is another proof of our commitment.</p>
<p>7) Does the 2020 programme leave sufficient possibilities for stakeholder involvement? In which areas may this in your view not be the case and should be reviewed by ENTSO-E?</p>			
<p>Climate Action Network (CAN) Europe</p>		<p>CAN Europe sees sufficient room for engaging in ENTSO-E’s Annual Work Programme 2020. We welcome the possibility to exchange on a regular basis with the ENTSO-E secretariat, ENTSO-E members and other stakeholders as a member of the Independent Advisory Council. We appreciate the efforts for transparency and stakeholder involvement going beyond formal stakeholder engagement process. ENTSO-E’s proactive role in launching the cooperation with environmental NGOs under the PAC project (Paris Agreement Compatible scenarios for energy infrastructure) has helped to increase not only awareness amongst civil society organisations but also their expertise with regard to energy infrastructure planning. We look forward to continue this fruitful exchange, hoping to further bolster up engagement of our member organisations.</p>	<p>Many thanks, CAN, for these constructive and nice comments. We need you and look forward to our interaction in 2020.</p>

	Estabanell Energia, S.A	Yes. The data providers area, should be clarify and defined the qualified third parties according the users' needs and serve various purposes, such as market analysis, research or trading relationship	To this aim, ENTSO-E has created the Transparency User Group (ETUG), a group involving stakeholders from varied work streams (regulators/ ACER/ academia/ traders) to provide feedback and recommendation on the content published on the platform.
	T&D Europe	In past years several opportunities for stakeholder involvement have been introduced. Examples are the Independent Advisory Council and also the Transparency Platform. We believe that these are very beneficial already today and that there is no need for more mechanisms at the moment. Instead, focus should be given on jointly learning how to make best use the existing mechanisms.	Thank you, T&D Europe, for these comments. We appreciate your support to the delivery of our mandates.
	SolarPower Europe	ENTSO-E already foresees the involvement of stakeholders through the European Stakeholders Committees (ESCs). To be effective, it is important that the recommendations of stakeholders are truly channelled to the transmission system operators. Higher involvement of transmission system operators or regulators in ESCs working groups, or regular contacts between the ESCs and the members of ENTSO-E and ACER could be established.	As already mentioned, ENTSO-E recognises the added value of interacting with stakeholders on key topics. Consequently, not only do ENTSO-E provide the platform for stakeholder interaction (European Stakeholders Committees, Advisory Council, etc.), but they also regularly convey key inputs from stakeholders to members mainly through reporting in ENTSO-E Committees, Board and Assembly.
8) On Chapter 1, is ENTSO-E adopting the right approach to implementation of legal mandates?			
	Estabanell Energia, S.A	Yes, through NCs definitions	Thanks, Estabanell.
	smartEn	<p>1) <u>Demand Side Flexibility Network Code</u> While smartEn acknowledges that the drafting of the Network Code is expected to be led by the EU DSO entity, a preparatory working group should be started by ENTSO-E in 2020 in order to provide input during the whole process. This should ensure TSO-DSO coordination on the topic, securing the full participation of Demand Side Flexibility in all markets and mechanisms, including at TSO level. Further delaying the drafting of the network code would have a severe impact on many providers of Demand Side Flexibility.</p> <p>2) <u>Review and report on structural congestion</u></p>	1) ENTSO-E took note of the announcement made by the European Commission during the last Florence Forum to launch the development process of new network codes in new areas such as demand-side flexibility. In the second half 2019 ENTSO-E has set up a new Steering Group on TSO-DSO Interface to be the single point of contact for any common work with European DSOs associations and the upcoming DSO entity. This Steering Group will involve experts from relevant committees and WGs within ENTSO-E to continue the joint work with DSOs experts on Active System Management, in particular the definition of guidelines for the implementation of market-based procurement of flexibility services and associated TSO-DSO cooperation schemes.

		<p>Building on the mandate by the Clean Energy Package on an increased transparency on structural congestion in neighbouring bidding zones, Article 14 (2), smartEn suggests expanding this methodology to all types of congestion. To provide the best possible solution for the network at any given moment, smartEn encourages ENTSO-E's members to increase transparency regarding the grid's needs, including congestion information at the local level.</p> <p>3) <u>Introduce decarbonisation criteria in the bid selection for balancing reserves</u> ENTSO-E should work towards implementing article 82 (2) of directive 2014/25/EU of 26 February 2014 on procurement by entities operating in the water, energy, transport and postal services sectors. This article encourages TSOs to introduce environmental criteria in their bid selection. ENTSO-E should issue guidelines on the implementation of such article prioritising technologies, like Demand Response and storage, that can provide the same services as traditional generation with lower emissions.</p>	<p>2) Every year TSOs are putting effort improve the technical report and provide additional transparency, however the scope of the report shall be focused to the congestions described in the CACM and CEP, namely, structural congestions and other major physical congestions between and within bidding zones, including the location and frequency of such congestions. The technical report published on October 2018 already includes the relevant internal congestions.</p> <p>3) The appropriate decarbonisation mechanisms to reach EU climate goals are decided at Member State level, following some EU conditions. The bid selection of balancing energy through the European balancing platforms is based on a market design that allows all market players (including smaller players, DSR, storage) to participate in the market, while the market must be technologically neutral, avoiding market distortions and maintaining a level playing field. In addition, other mechanisms are in place to ensure the decarbonisation of the sector (e.g. ETS).</p>
SolarPower Europe		<p>Overall, SolarPower Europe supports the strong focus put on the implementation of the existing network codes and the Clean Energy Package, and that appropriate resources are dedicated to this.</p> <p>Regarding implementation of the network codes, it ENTSO-E mentions that it will work on ensuring transparency on the implementation of grid connection codes as well as “strive to achieve both an alignment of standards and compliance procedures” with the code. These two points are very important for the solar industry. Regarding transparency of the implementation measures, the actions proposed by ENTSO-E at the September Grid Connection ESC should mentioned: publication by ACER of a report on the implementation of the RfG, update of the Active Library page and update of the Monitoring Excel File. In addition, further actions on the coordination of compliance procedures should also be envisaged, in coordination with the CEN-</p>	<p>ENTSO-E remains firm with the plan and the task to continue providing high levels of transparency through the Active Library and the monitoring excel file. Our coordination with CENELEC and international standardisation bodies (IEC) is a reality. The work within the expert groups continues positively with phase two of the three first expert groups launched in October 2019. Progress will be reported in the GC ESC meetings.</p> <p>Regarding the “smart grid indicator” proposal, the development of actual indicators is a responsibility of national regulatory authorities and it is therefore their decision to involve stakeholders in the development phase. ENTSO-E is nonetheless eager to exchange with relevant stakeholders on how these indicators could look like and if European guidelines are needed for this. We could commonly set up a workshop in 2020.</p>

		<p>CENELEC standard. Finally, the current work on the assessment of the applicability of the RfG network codes to storage and mixed customers sites, and the possible consequences of this assessment could be mentioned.</p> <p>In addition, more details could be provided as regards the drafting procedure and timeline for the coming network codes.</p> <p>Finally, SolarPower Europe welcomes the proposal to draft a ‘smart grid indicator’ by the TSO-DSO platform, but stresses that stakeholders should be provided the opportunity to provide input to or comment the proposal.</p>	
<p>9) On Chapter 2 - With regards to infrastructure development, in your views, is ENTSO-E setting the right priorities with regards to TYNDP, system adequacy and sector coupling? Please explain your views.</p>			
	<p>Climate Action Network (CAN) Europe</p>	<p>CAN Europe is concerned that the current priorities of infrastructure development pave the way for preserving the high level of fossil gas consumption in Europe. This would lock the EU on a high level of greenhouse gas emissions and undermine the EU’s climate and energy targets. While EU legislation requires the ENTSOs to provide a “consistent and interlinked electricity and gas market and network model”, the scenario development for the TYNDP 2018 has not yet been in line neither with the EU’s climate target under the Paris Agreement nor with the European Commission’s long-term strategic vision (LTS) towards climate neutrality by 2050.</p> <p>The current TYNDP 2018 assumes that the EU’s gas demand will remain stable or even increase by 2030, reaching between 4,368 and 5,029 TWh. The baseline scenario of the Commission’s LTS however assumes that the EU’s gas demand will fall to only 2,233 TWh in 2030. According to the LTS, in an EU energy system compatible with the 1.5°C target of the Paris Agreement, only 805 to 1,076 TWh of gaseous energy carriers would be needed in 2050. Reinforcing infrastructure for an energy carrier that will fade away could lead to</p>	<p>The electricity part of ENTSOs 2020 scenarios built in 2019 have been aligned to NECPs in Sept. 2019 to the extent possible. The ‘Global Ambition’ and ‘Distributed Energy’ Scenarios are built in line with the Paris Agreement target of limiting the increase in the global average temperature to 1,5 °C and are cognisant of the efforts of the EU-28 to reduce emissions to net-zero by 2050. This is basis for 2020 TYNDP evaluations and will have direct impact on the electricity TYNDP CBAs.</p> <p>Moreover, smart Grids, batteries and other ways of DSR are already modeled in scenario building and reduce accordingly the CBA of grids. In this sense the grid development can be considered as no regret.</p>

		<p>stranded assets, thus to high infrastructure costs for consumers, according to regulators' warnings.</p> <p>For these reasons, CAN Europe urges both ENTSO-E and ENTSG to embody a pathway reaching the Paris Agreement's 1.5°C target in their infrastructure development. We encourage ENTSO-E to continue the analysis of renewable electricity's decarbonisation potential in the heating & cooling and in the transport sectors, building on the new interlinkage model. In view of tapping the full potential of greenhouse gas reductions, ENTSO-E together with ENTSG should substantiate in their joint infrastructure development how coupled electricity and gas grids can speed up the integration of variable renewable electricity in the most efficient way. This would entail a realistic assessment of the availability of different non-fossil gases and infrastructure costs related to their market introduction. Transparency of the assumptions on costs of non-fossil gases and other flexibility options such as electricity storage technologies and demand response are key for a cross-sectoral optimisation.</p>	
	<p>Estabanell Energia, S.A</p>	<p>Such are described in the COMO network roll-out and migration in three years to smoothen the associated budget impact for ENTSO-E.</p>	
	<p>smartEn</p>	<p>Develop the Future Power System and Ensure Transparency.</p> <p>The risk exists in the current objective scenarios presented in the Annual Work Programme 2020, for them to be too focused on new investments and infrastructure. While smartEn supports the approach of thoroughly exploring all options on resource adequacy, we ask for demand side resources to be put at the forefront. Enabling these resources to provide their flexibility would allow for a more efficient and cheaper overall system while working towards the achievement of the decarbonisation targets.</p> <p>The current assumptions in all TYNDP scenarios are lower than the 60% electrification reached in other organizations' scenarios. smartEn asks for a higher ambition on ENTSO-E's side, to allow electrification and the demand side to play their role in decarbonising the energy system. smartEn believes that the TYNDP should explore all options,</p>	<p>Demand side resources have been duly taken into account in the scenario building process, which is subject to intensive stakeholder consultations, both on the scenario storylines as well as scenario numbers. Assumptions on DSR and batteries is used in order to adjust the resulting residual load shapes. Only after this adaptation, grid planning looks at the remaining CBAs of infrastructure investments which reflect values only after application of DSR measures beforehand. Concerning 60% electrification of end-demand assumed by studies such as Eurelectric, WindEurope and ECF, ENTSO-E's scenarios have substantial less electrification of heavy duty transport. Resulting CBA for electricity lines therefore can be considered as appropriate. More electrification of end-consumption will lead to the need of more grid.</p>

		<p>including a much higher level of electrification. This should include the correct electrification levels to ensure the emissions reduction targets. This would also allow the demand side to play a more important role in decarbonising the energy system.</p>	
	<p>T&D Europe</p>	<p>T&D Europe welcomes the statement on National Energy and Climate Plans (NECPS) being the base for developing the TYNDP 2020 scenarios and Mid-term adequacy Forecast. This reinforces the message that electricity grids contribute to reaching decarbonisation objectives and also ensure consistency in infrastructure planning and coordination at national and European levels.</p> <p>We also look forward to the increased accuracy and transparency in data and methodologies that will be implemented for the TYNDP 2020. We recommend to highlight even more the need of developing holistic scenarios of energy demand across all sectors and all sources of end-energy. Electricity will play the major role in making Europe's energy system carbon-neutral. This implies significant shifts between the traditional sectors. These need to be reflected in integrated demand scenarios.</p>	<p>ENTSO-E attaches great importance to the development of holistic scenarios for energy demand across all sectors and all sources of end-energy. ENTSO-E is committed to cooperate with relevant knowledge parties in order to successively improve assumptions and remove uncertainty.</p>
	<p>SolarPower Europe</p>	<p>Regarding infrastructure development, it is important that ENTSO-E scenarios are based on, or at least include a scenario based on, the objective of carbon-neutrality of the European economy by 2050 (put forward by the European Commission and endorsed, as of today, by 25 EU member states) and the electrification rates identified in the European Commission 2050 Long Term Strategy as well as in several stakeholders' assessments (EURELECTRIC, WindEurope, European Climate Foundation).</p> <p>In addition, ENTSO-E has identified "stakeholder interaction" as a key element of the scenarios building process, since these should be reference scenarios in the future. This should result into concrete consultation events with the industry and due integration of the latest cost figures.</p>	<p>2 out of 3 scenarios have been build based on carbon neutrality in 2050. Views on electrification of end-consumption varies between different studies, mainly driven by different assumptions in the transport sector. The comparisons with other 3rd party studies have been published for consultation mid November 2019 for a 2-month consultation process. As compared to the mentioned studies of Eurelectric, WindEurope and ECF, whose electrification rate of end-consumption goes beyond 60% - 65%, the scenarios of the ENTSOs are more conservative and assume up to 50%. This conservative approach ensures, that electricity CBAs can be considered as appropriate and certainly are not too overoptimistic concerning electricity end-consumption</p>

10) Does the 2019 programme leave sufficient possibilities for stakeholders to contribute to the ENTSOs' scenarios? Please explain your views.

	Climate Action Network (CAN) Europe	CAN Europe is aware of the different channels such as consultations, webinars and events to contribute to the elaboration of ENTSOs' scenario. Timely information on upcoming publications and events and deadlines for stakeholder engagement will help CAN Europe to increase its membership's engagement in the scenario building process.	
	Estabanell Energia, S.A	Yes, mainly through the European Commission Expert Group, under the Smart Grid Taskforce.	
	T&D Europe	Yes, T&D Europe members were informed of the draft scenarios and could comment on them.	
	SolarPower Europe	NB. We have been solicited by the Scenarios team for the first time the week of November 11th, we appreciated that initiative. We hope to have more opportunities to input the scenarios with our figures and visions.	Scenarios have been published for a 2-month consultation period. We look forward to receiving your feedback on this topic.

11) Is ENTSO-E adopting the right approach towards regional development?

	Estabanell Energia, S.A	Not exactly, because the approach brings a more integrated view of the electricity system, and it will loss the visibility of the DSO last mile network infrastructure that it is expected to be upgraded a lot.	ENTSO-E has released a Vision for System Operation and Market Design towards 2030 which promotes the idea of a system of systems. In this vision, TSO-DSO cooperation is acknowledged as crucial to ensure a proper coordination of different geographical and functional layers. This holds particularly true for the efficient use of distributed flexibilities in grid and system services, as the same resource could be used by both actors. The launch of a new Steering Group on TSO-DSO interface in ENTSO-E reflects this priority. It will identify and coordinate all topics on which such cooperation needs to be strengthened (at national, regional or EU level), from active system management to network development planning, R&D&I activities etc.
	SolarPower Europe	Regarding regional development, SolarPower Europe believes that the establishment of Regional Energy Foras, gathering the TSOs, the regulators and the governments of the countries of one regions is key	At TSO level, ENTSO-E supports several initiatives that will enable further integration of renewable energy such as:

		to support regional cooperation on renewable energy development. Synergies with the funding available to cross-border renewable projects through the Connecting Europe Facilities or with the renewable energy financing mechanism to be established should be ensured.	- the roll-out of Regional Coordination Centers including the development of new tasks stemming from the Clean Energy Package - the technical implementation of regional balancing platforms which will provide new market opportunities for renewable energy generators ENTSO-E regularly liaises with NRAs and ministries on these topics including in different fora such as the regional Pentilateral Forum.
12) Does ENTSO-E set the right focus on Transparency Platform, data exchanges and transparency and communication activities?			
	Climate Action Network (CAN) Europe	CAN Europe welcomes the reference to the open data license in ENTSO-E's work programme. We consider an open data license as very relevant, in particular for the access of academia and (new) market participants. Implementing the Transparency Regulation (EU 543/2013) means that an open data license should cover all data published on the TP, irrespective of who owns and has submitted the data to it. Market participants shall not only be able to read the data online but actually be entitled to actively use the data. This would make sure that market participants can use data from the Transparency Platform in a legally safe manner.	ENTSO-E also considers open data as a key element in data publication. For this reason, ENTSO-E has worked with its members to ensure that TSO data is already covered by open data license. When it comes to non-TSO data, ENTSO-E is following up too. However, due to the existing legal framework and legal uncertainty, there are limitations foreseen.
	Estabanell Energia, S.A	When it will be known the normalization and standardization and platform to be applied.	
	smartEn	<u>Further developing of the Transparency Platform</u> smartEn strongly welcomes and supports the development of the Transparency Platform. So far, data in the Transparency platform is not always complete, and the reasons for it missing are not clear. We recommend further developing this platform and providing more information as to why some data is not present. For example, for certain countries, it is not clear if the missing data on balancing products is because the data has not been shared by the TSO or because a specific product does not exist in that country.	When the platform shows N/A, it means that data is not submitted/ received by the platform, therefore shows missing. There are internal reports developed on data completeness which notify on the data being not complete to the data providers. Referring to the specific question, if a TSO uses balancing products, they should be sent to TP, as per requirements set in Transparency regulation. If not, please report the issue to the transparency@entsoe.eu.
	T&D Europe	T&D Europe is welcoming the increased transparency and the shift towards real-time data (every 15 min) on the Transparency Platform. We also see a positive development in the publication of de-anonymized critical networks elements.	ENTSO-E intends to further develop and improve the Transparency Platform. TSOs have indicated that they would like to use the TP for data publications that are not strictly to be made on the TP but due to its

		The Transparency Platform may also become an adequate place to publish results of the smartness monitoring process requested from the National Regulators in the CEP.	central role, it became the obvious choice e.g. some additional data stemming from EBGL implementation.
	SolarPower Europe	Yes, no further comments.	Thanks, Solar Power Europe
13) Is ENTSO-E setting the right priorities with regards to Research, Development and Innovation activities?			
	Estabanell Energia, S.A	Yes. As a first approach is doing a coordination of innovation activities, with the setting up of a tool to promote exchanges of best practices and synergies on innovation within the TSO-DSO communities	Thanks, Estabanell
	T&D Europe	The focus on flexibility and end-to-end digitalisation is appropriate. Given the further integration of transmission and distribution networks, is cooperation in Research Development & Innovation between ENTSO-E and the DSO entity also foreseen?	ENTSO-E has set up a new Steering Group on TSO-DSO Interface to be the single point of contact for common workstreams with the upcoming DSO entity. It counts the Chair of ENTSO-E R&D&I Committee among its members. The Steering Group will actively contribute to the development of ENTSO-E new R&D 2030 roadmap which will provide the basis for ENTSO-E's new R&D activities. In the meantime ENTSO-E and the European DSOs associations are in the process of updating their Memorandum of Understanding with an explicit reference to cooperation on EU-funded R&D schemes which reflects ongoing collaboration such as the joint participation of ENTSO-E and E.DSO for Smart Grids in the H2020 Interrface consortium, and exchanges of best practices regarding R&D projects on distributed flexibilities.
	SolarPower Europe	The focus put by ENTSO-E on flexibility needs and, more broadly, the needs of the future energy system, is supported by SolarPower Europe. The R&I activities of ENTSO-E could also include pilots on distributed flexibility usage in coordination with DSOs and on the provision of flexibility services by innovative renewable plants (see our report Grid intelligent solar https://www.solarpowereurope.org/wp-content/uploads/2018/12/4018_SPE_Grid_Intelligent_Solar_report_05_hr.pdf).	ENTSO-E is already involved in several projects which address the integration of distributed flexibilities in grid and system services (Interrface, Coordinate, EU Sysflex, Crossbow, Flexitranstore etc.). These projects are ongoing and ENTSO-E will contribute to the dissemination of their findings over 2020. ENTSO-E is also updating its R&D roadmap towards 2030 for Q1 2020. The activation of distributed flexibilities and the role of digitalisation in this regard are identified as key research topics. ENTSO-E will consequently explore research opportunities at national and EU level to demonstrate innovative use cases.

14) Please indicate if any important elements are missing from ENTSO-E’s work programme or if anything should be of higher priority than presently indicated.

	smartEn	<p><u>Identify a clear role for FCR</u> FCR has become the “go-to solution” for system problems. While it ought to be the first response to frequency deviations, it should not be used as an excuse to avoid wider systemic issues. ENTSO-E should explore the creation of new faster FCR products or expanding the existing FCR capacity. This goes in line with ENTSO-E's “Continental Europe Significant Frequency Deviations – January 2019” report, where such possible solutions are suggested to deal with deterministic frequency deviations.</p>	<p>ENTSO-E will run a two-month public consultation on a report on deterministic frequency deviations from 2 December 2019, in which ENTSO-E will ask market participants on their expectations on the impacts of the solutions proposed in the report (including fast frequency reserves). Based on the stakeholders' feedback, ENTSO-E will continue investigating the most adequate and efficient solution(s).</p>
	T&D Europe	<p>We believe that reinforcing cybersecurity of the networks should be part of the programme. Cybersecurity is an increasingly important issue, as highly distributed, privately owned resources will become part of the end-to-end digitalisation.</p>	<p>Digitalisation in one of the key drivers that will enable the energy transition. TSOs are required to overcome a variety of new challenges, such as the increased amount of variable generation, sector coupling, power and transport connected through e-mobility, increasing electrification and, in particular, heating and cooling, as well as market facilitation and enables new actors and new roles, centred around prosumers and active system management. However, the energy system is a key strategic asset and an important target for nefarious actors, making it particularly vulnerable to attack compared to other industries. ENTSO-E is therefore fully committed to ensuring high levels of protection on the power system, and the upcoming Network Code on cybersecurity will be the occasion to implement such a vision.</p>

15) Any other comments?

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