

Targeted consultation on the revision of Regulation (EU) 347/2013 on guidelines for trans-European energy infrastructure (TEN-E Regulation)

Fields marked with * are mandatory.

Introduction

What is the TEN-E Regulation?

The European Green Deal confirms the EU's ambition to be climate neutral by 2050 and outlines a wide range of measures in different policy areas which need to be revised or newly introduced in order to meet this objective. In the energy sector, one of the key aims is to ensure that our energy infrastructure is fit for the purpose of achieving climate neutrality. In this sense, the Green Deal highlights the importance of smart infrastructure in this transition and specifically identifies the need to review and update the EU regulatory framework for energy infrastructure, including the Regulation (EU) No 347/2013 on guidelines for trans-European energy infrastructure (the "TEN-E Regulation"), to ensure consistency with the 2050 climate neutrality objective. As part of the political agreement between the European Parliament and the Council on the Connecting Europe Facility for the period 2021-2027 – the part of the EU budget which funds cross-border infrastructure projects for energy, transport and digital services – it was already agreed that the Commission should evaluate the effectiveness and policy coherence of the TEN-E Regulation. This revision of the TEN-E Regulation will also address the new policy ambition of the European Green Deal inter alia by integrating a significant increase in renewable energy in the European energy system and by putting the energy efficiency first principle into practice. More information on the European Green Deal is available on the [EC website](#).

The TEN-E Regulation lays down rules for the timely development and interoperability of cross-border energy infrastructure [TEN-E] networks in order to achieve the EU's energy policy objectives. Its key objective is the timely implementation of the projects of common interest (known as "PCIs") which interconnect the energy markets across Europe. Interconnected energy markets allow for better integration of renewable energy sources, better security of supply and higher competition within markets that keeps prices in check. The TEN-E Regulation sets out criteria for establishing the PCIs necessary to implement priority corridors and areas in the categories of electricity, gas, oil, smart grids and carbon dioxide networks.

More information on the TEN-E network is available on the [Europa website](#).

What is this survey about?

This survey is one of the elements of the wider stakeholder consultation strategy to inform about the revision of the TEN-E Regulation. The aim of this targeted survey is to collect information and gather views with respect to the implementation and functioning of the TEN-E Regulation from people with professional experience of how the current regulation works in practice. It also addresses forward looking questions as the evaluation is carried out in parallel with the impact assessment. Further background can be found in the Commission's [inception impact assessment](#).

Who should answer?

Professionals working for organisations involved in the design, implementation or permitting processes of energy infrastructure projects (notably Project Promoters of PCIs, National Regulatory Authorities and National Competent Authorities) or organisations with a strong interest in energy infrastructure and the topic it relates to.

It will only take approximately 30-40 minutes to complete this survey. Please note the information on the use of your input and personal data on the next page.

Your experience with the provisions of the TEN-E regulation in practice are of great value to us, which is why we would like to encourage you to provide explanations and examples in the open text boxes below the questions.

How is the survey structured?

The survey is structured in five main sections on (i) Effectiveness, (ii) Efficiency, (iii) Relevance, (iv) Coherence and (v) Value added by the EU Regulation.

The section on effectiveness is further broken down to collect your input on

- the permit granting process,
- public consultations,
- the PCI selection process,
- governance and the roles of different actors,
- cross-border cost allocation,
- and investment incentives.

How will this survey make a difference?

The survey aims to gather evidence to assess how the current TEN-E Regulation has worked in practice – which aspects have worked well, and not so well, and why – identifying factors which have helped or hampered achieving the objectives foreseen, and provide useful input for the Commission in the preparation of its revision. Your feedback will therefore help influence the future development of the regulatory framework for projects of common interest in the field of energy infrastructure.

Thank you for taking the time to respond to this survey – we highly appreciate your feedback! Should you have any questions concerning this survey or the study, you can contact us at TEN-E@ramboll.com.

Use of your input and personal data

Please refer to this document for the use of your personal data:

[TEN-E_personal_data.pdf](#)

Section 0: About you

Please indicate your name:

Lea Dehaut

Please leave your email address:

lea.dehaut@entsoe.eu

*** Please select the country in which you are based:**

- Austria
- Belgium
- Bulgaria
- Croatia
- Cyprus
- Czechia
- Denmark
- Estonia
- Finland
- France
- Germany
- Greece
- Hungary
- Ireland
- Italy
- Latvia
- Lithuania
- Luxembourg
- Malta
- Netherlands
- Poland
- Portugal
- Romania
- Slovak Republic
- Slovenia

- Spain
- Sweden
- United Kingdom
- (other) Non-EU country

*** Please select what type of organisation you represent:**

- National Regulatory Authority
- National Competent Authority (ministry or other governmental body)
- Transmission system operator
- Distribution system operator
- Energy producer
- Industry
- Telecom company
- Local or regional authority
- Civil society
- Research, academia
- Other (please specify):

Please specify the name of the organisation you represent:

ENTSO-E - European Network of Transmission System Operators for Electricity

*** Please indicate what best describes your situation as a project promoter:**

- We are/were the project promoter of a PCI.
- We have submitted one or multiple application(s) for project(s) to be on the PCI list.
- We have never applied for project(s) to be on the PCI list.

Section 1: Effectiveness of the Regulation

The TEN-E Regulation (hereafter: the Regulation) was designed to help overcome some of the key barriers to the development of European wide energy infrastructure. The key questions asked to assess the effectiveness of the Regulation therefore concern the extent to which it has achieved its objectives, and the factors that influenced this.

To what extent do you agree with the following statements regarding the TEN-E Regulation's overall impact?

	Completely agree	Agree	Neither agree nor disagree	Disagree	Completely disagree	Do not know
* Contributing to energy market integration throughout Europe	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Achieving an adequate security of supply level	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Contributing to competitiveness in the EU energy market	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Achieving the 2020 climate and energy targets	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please explain your answer:

The reinforcement and adaptation of the electricity transmission grids is paramount to reaching these different targets. However, the achievement of these objectives does not only depend on measures related to the implementation of the TEN-E Regulation (e.g. regarding the security of supply, the need for a greater coordination of energy policies between Member States to ensure the constant resilience of the European electricity network).

*** Which factors do you think have contributed to the achievement of the objectives? On the contrary, which factors have hindered the achievement of the objectives?**

The following factors can be considered to have contributed to the achievement of the objectives: a common understanding of energy infrastructure needs across Europe; increased political support for PCIs; financial support for PCIs which otherwise would have had difficulties being realised; PCI selection methodology, where the contribution of a project to these objectives is assessed; increased cooperation, incentives to streamline procedures (e.g. article 10 setting up a 3 ½ year period to limit the length of the procedures)

The following factors can be considered to have hindered the achievement of the objectives: PCI status, which does not sufficiently speed up implementation; risks associated with PCI status (notably in the context of the CBCA mechanism, see dedicated section) and administrative burdens linked to PCI projects. Possible discrepancies in the interpretation of some provisions (e.g. as from which date runs the 3 ½ year period for authorisation procedures?). In Member States where a legal framework is already very demanding in terms of consultation, some requirements from the EU Regulation may lead to time-consuming redundancy with no real benefit. It should be foreseen that in such cases, additional requirements should not apply when they do not create added value for the community.

To what extent do you agree with the following statements concerning the financing of energy infrastructure projects?

The Regulation helped to finance energy infrastructure projects by...

	Completely agree	Agree	Neither agree nor disagree	Disagree	Completely disagree	Do not know
* Making financing instruments available to finance PCIs.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Increasing financing capacities of TSOs (ability to raise debt at a reasonable cost, ability to attract new institutional investors).	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
*						

Providing targeted EU financing under the Connecting Europe Facility.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Other (please describe)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

Please explain your answer:

The possibility to access CEF funds contributes to securing investments. In addition, with the objectives of the Green Deal in mind, there will continue to be significant investment needs regarding energy infrastructure. The CEF will have to continue playing an important role in this context.

PCIs are critical to signal relevance and financing from both internal and external sources. Whenever a project can generate a positive impact in terms of social and economic welfare but will not be built for lack of interest or financial capability on the part of the promoters, CEF grants are a powerful tool to bridge the commercial gap that will make them attractive to investors. The inclusion of new types of projects as eligible to the PCI status should not be detrimental to the sound development of transmission infrastructure.

The regulation foresees three possibilities to support the financing of PCI projects: CBCA, CEF-funding and incentives according to Article 13.

- CEF funding: The fact that a lot of projects could be co-financed via CEF-funding is a positive achievement of the TEN-E Regulation. It is important that it remains so in the revised regulation. The allocation of CEF funding should continue to enable/contribute to the implementation of approved PCI. EU financing gives comfort to financial institutions who provide the rest of the money (because it makes the company stronger from a financial point of view) but a company's financial health also depends on other parameters.

- CBCA has shown a lot of shortcomings in practice. CBCA has been used in most cases as a prerequisite for CEF application.

- Incentives of Article 13 have been rarely used according to ACER's report on the progress of PCI. Normally, these incentives should be provided by national regulatory systems to enable required investments.

Section 2: Permit granting processes

What has been the average duration of the permit granting process for projects in your Member State?

	0-1 year	1-2 years	2-3 years	3-4 years	4-5 years	5-6 years	6-7 years	Do not know
* Duration of the permit granting process for PCIs	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Duration of the permit granting process for projects that were <u>not</u> PCIs	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

Please explain your answer:

As ENTSO-E is an association this question does not apply

Over time and since 2013, do you agree that the TEN-E Regulation has had a positive impact on shortening the duration of the permit granting procedure for PCIs?

- Completely agree
- Agree
- Neither agree nor disagree
- Disagree
- Completely disagree
- Do not know

Please explain your answer:

Although PCI status may facilitate procedures, it does not generally allow to be exempted from any regulation relating to the granting of authorizations. Provisions like the introduction of the one-stop-shop have increased the efficiency of procedures for some Member States, but, on the other hand, the TEN-E Regulation also adds additional steps and obligations that are linked to the PCI status. Speeding up permitting procedures is the most important benefit that should be delivered by the TEN-E Regulation.

To what extent do you agree that the permit granting in 'one-stop shops' has...

	Completely agree	Agree	Neither agree nor disagree	Disagree	Completely disagree	Do not know
* Reduced complexity of the permit granting process?	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Increased efficiency in time and costs of the permit granting process?	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Increased transparency of the permit granting process?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Enhanced cooperation between Member States?	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Would allow addressing challenges related to the permitting of infrastructure for offshore renewable energy projects?	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please present your views with regards to possible changes which will help improve the process:

The success of the one-stop-shop varies across Member States. In general, the principle contains the potential for more efficient permitting – for PCIs and beyond. In countries that introduced the one-stop-shop principle even before the introduction of TEN-E and/or beyond PCIs, processes might be better established and learning curves for both project promoters and permitting authorities have led to a smoothening of the processes. Nevertheless, discussions on responsibilities and obligations remain; e.g., which authority is responsible for granting permits for assets related to the PCI, but that under national provisions are in the hands of local authorities rather than of the authority representing the one-stop-shop. In this context, it is also needed to clarify what steps need to be taken regarding PCI obligations, if another permitting entity is involved. These examples show that it is difficult to establish a sacrosanct one-stop-shop process for all eventualities; in any case, the designated once-stop-shop entity should be prepared to provide rapid guidance/assistance in case questions on the process arise, in order not to waste time for process-related questions in the course of a project.

The efficiency brought by the one-stop shop process would be significantly improved if such obligation were mirrored for the treatment of the appeals related to PCI in each Member State (appointment of one single authority).

* What has taken the most time in the permit granting process and how could it be improved?

Please select the two processes which have the most impact on the duration of the permit granting process:

at most 2 choice(s)

- Pre-application procedure
- Environmental impact assessments
- Public consultation
- Statutory permit granting procedure

Please explain your answer and, if applicable, identify possible improvements:

Please ignore our answer to the check-boxes above. We have only checked one to be able to submit our answer. Only the text below should be considered.

Experiences and answers strongly depend on Member States specific permitting regimes and projects specific experiences. A more comprehensive picture can be provided by the ACER PCI Monitoring reports, in which project promoters have reported on exactly this question. Examples for aspects worth mentioning in this context are:

- Early public consultation is considered helpful by many project promoters.
- Public consultation should not be reduced, as it does not only contain the potential to help project promoters to deliver better projects, but also helps to strengthen public acceptance for the underlying processes. At the same time, permit granting may be accelerated (for example: the possibility for administrative authorities to impose additional requests during the course of the different sequences of investigations should be restricted within a certain time limit.).
- Public consultations often lead to a necessary broadening of the scope of the material and/or additional material to be delivered that goes beyond the initially requested scope. It is essential that public consultation is carried out early enough in the process to anticipate needs for further analysis at an early

stage and to avoid delays in the following steps.

- The delays in building the required infrastructure often result from public opposition. To gain acceptance, efforts need to be put in place to engage with local citizens to address people's concerns and needs and to jointly develop approaches for the project implementation. An approach we refer to as "better projects", presented by ENTSO-E and the Renewables Grid Initiative, aims at developing locally tailored, transparent and participatory planning processes. A better project should be understood as a process that starts with improved stakeholder engagement and includes the implementation of additional measures which result from stakeholder input. The regulatory framework should recognize and encourage this approach, which induces additional investment costs, that are generally compensated by benefits of timely commissioning of projects.
- Even though permitting procedures have gained momentum in many cases (also thanks to the one-stop-shop principle which is applied beyond PCIs and project promoters can by now rely on good practices and experiences from previous permitting procedures), it is important to note that planning obligations for project promoters in permitting procedures, in particular with regard to environmental assessments, have increased significantly, leading to additional burdens and workload for permitting authorities. It should be ensured that any new measure on permitting introduced in the TEN-E context helps to increase effectiveness and efficiency in permitting procedures, potentially leading to further spill-over effects beyond PCIs.
- In general, learning curves on both sides (project promoters and permitting authorities) should lead to more streamlined and efficient processes in the future. To foster mutual learning and provide for more efficient and effective permitting procedures, exchange of good practices within Member States and beyond should be encouraged.
- Regarding environment impact assessments, the requirement of EIA is not linked to the PCI status but to the nature of the concerned assets. For an interconnector, it would facilitate and accelerate the process to set forth the principle that each promoter shall provide its national authority with the EIA for its part of the project and submit to the authority of the other project promoter a simplified version of this EIA (saving time, less risk of interpretation discrepancies with the translations).

Section 3: Public consultation

To what extent do you agree with the following statements about the role of at least one public consultation introduced for PCIs?

The additional public consultation introduced for PCIs has...

	Completely agree	Agree	Neither agree nor disagree	Disagree	Completely disagree	Do not know
* Increased/improved public participation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Increased awareness of PCI projects	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Increased trust among participants	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Increased public acceptance of PCI projects	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Led to improvements in the design of the projects	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

Please explain your answers, possibly comparing to other non-PCI projects:

Public consultation is indispensable in the permitting process, leading to increased public acceptance of the process and improvement of the project. Public consultation is one of the tools that support the smooth and fast realization of the project.

In Member States where a legal framework is already very demanding in terms of public consultation, some requirements from EU Regulation can create a time-consuming redundancy without any real benefit. It should be foreseen that, in such cases, additional requirements should not apply when they do not generate any added value for the community.

As TSOs, we observe that fostering public participation in grid development projects not only helps to build trust in the concerned communities but also contributes to a more inclusive planning and better planning results.

When it comes to defining concrete participation and communication measures, the TEN-E framework should provide for the right level of flexibility to achieve the intended aim, without compromising on the ambition. The right participatory tools differ as much as the respective projects. For example, an information leaflet of no more than 15 pages, as required by the Regulation, might be the right tool and the right scope and format for one project, but not in another. To learn from successful participation measures in other projects, an exchange of best practices in public participation should be encouraged.

*** To what extent would you agree that the input from the public consultation introduced by the TEN-E Regulation is/was used to guide the further development of projects?**

- Completely agree
- Agree
- Neither agree nor disagree
- Disagree
- Completely disagree
- Do not know

Please explain your answers, possibly comparing to other non-PCI projects:

Results of public consultations are generally considered for the further advancement of the project, but at different times and under different formats, depending on the specific permitting regime of the Member State. Authorities granting authorizations should be more actively involved in the consultation process in order to speed up the approval process.

*** To what extent do you agree that the requirement for at least one public consultation is enough for increasing transparency and participation in the design and planning of the projects?**

- Completely agree
- Agree
- Neither agree nor disagree
-

- Disagree
- Completely disagree
- Do not know

Section 4: PCI selection process

To what extent do you agree with the following statements concerning the PCI selection process?

	Completely agree	Agree	Neither agree nor disagree	Disagree	Completely disagree	Do not know
* PCIs selected are the most relevant projects to the fulfilment of the TEN-E objectives.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Cost-benefit assessments for the selection of PCIs are using an appropriate methodology.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please explain your answers:

The EU-wide CBA is the tool underlying the TYNDP – it is therefore correct to use the same evaluation tool for the selection of PCIs.

In the context of the Green Deal objectives, more attention should be given to the CO2 indicator included in the current CBA. Often, the focus of stakeholders and policymakers lies in the monetized part of the CBA. It is important to note that the current CBA already contains a metric that is highly relevant for assessing a project's contribution to climate objectives and is critical to make the transmission network ready for a carbon-neutral future.

In this context, it should be noted that the CBA methodology is not static, but continuously evolving through regular evaluation and adjustments. The methodology is developed by TSOs in close cooperation with ACER and the European Commission and in consultation with relevant stakeholders. Eventually, the methodology needs final approval from the European Commission as neutral actor.

ENTSO-E contributes to developing the PCI list by providing data and analysis derived in a very transparent way. It should be ensured that the whole process building on this information adheres to high transparency standards.

To what extent do you agree that the role of the different actors listed below is adequate in the selection procedure?

	The role is adequate	The role should be weakened	The role should be strengthened	Do not know
* European Network of Transmission Systems Operators for Electricity and Gas (ENTSO-E /ENTSO-G)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Agency for the Cooperation of Energy Regulators (ACER)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* European Commission	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Regional Groups	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* National Regulatory Authorities (NRA)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* National Competent Authorities (NCA)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Transmission systems operators (TSO)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Distribution system operators (DSO)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Other stakeholders (NGOs, energy industry, telecom companies, trade associations, finance community, etc.)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

Please explain your answers and, if applicable, elaborate on how the role of actors should change.

The investment decision lies at the national level, in line with the relevant national framework and with the principle of subsidiarity and following the initiative of the project promoters. The analysis that prevails in the selection of PCIs at the European level does not allow for the same granularity of analysis as the one carried out at the national level, to take into account the benefits for the community, with regard to all the parameters, including security of supply and the impact of tariffs.

Step by step, more and more industry actors can be integrated into the scenario building that underlies the TYNDP and therefore also the PCI selection process. This continuous and regular improvement of the process is possible because of the openness of the process in the Regulation and the neutral position of TSOs. Introducing additional approval steps of the TYNDP by external entities would make such a continuous improvement impossible and its neutrality questionable.

The two processes of PCI selection and network planning have to be distinguished, although the European frameworks creates links between them. The cost-benefit analysis of a project is necessarily more limited and less certain at the stage when PCI status is granted, than at the time when an investment request is submitted (because the characteristics of the project, or the economic and energy context, may differ to when it was originally included in the list of PCIs). It should therefore be possible for the respective national authorities in charge, who are the guardians of the general interest, to reject an investment request.

To what extent do you agree with the following statements concerning the gas and electricity EU-wide Ten-Year Network Development Plans (TYNDPs)?

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	Completely agree	Agree	Neither agree nor disagree	Disagree	Completely disagree	Do not know
* The current framework is fit for purpose.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* The electricity and gas market and network models are sufficiently interlinked (e.g. scenarios and cost-benefit assessment).	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* The current framework does sufficiently match the need for system integration, i.e. the consideration of sectors other than gas and electricity.	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* The TYNDPs do reflect enough coordination with distribution level networks.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* The relevant actors are involved in the TYNDP processes and their respective roles are adequate.	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* The TYNDPs do reflect sufficiently energy efficiency aspects.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please explain your answers:

Interlinking the various energy sectors will help to find efficient solutions for certain system needs, while supporting a high level of system security and resilience. As smart sector integration is a stepwise process driven by technological developments, synergies and uncertainties, the smart coordination of different sectors and systems is needed under a « one system of interconnected systems» view to ensure an affordable, secure, effective and cost-efficient transition. Ongoing common scenarios and interlinked modelling processes between ENTSO-E and ENTSG reflect significant methodological advancements of TSOs at national and European level to analyse and capture the benefits of such an integrated approach. TSOs, with their holistic system view, combining knowledge of operating patterns of the system, asset management, translating markets into physics, are best placed to identify system needs in an efficient and neutral way and to assess the system-wide costs and benefits from a societal point of view.

Furthermore, to better picture the necessary “one system view”, it will become more and more relevant to enlarge the scenario-building process in the TYNDP to sectors beyond electricity and gas and to introduce an economic assessment of long-term scenarios in the scenario-building phase, complemented by a multi-sectorial view in the project-assessment phase of the TYNDP. Decision in between various solutions addressing one specific system need should be taken at national level, in consistency with the one-system

view.

The economic assessment of different long-term scenarios within a new multi-sectorial planning approach can take into account all costs (both of the energy system and of technologies “behind the meter”, e.g. electric vehicles, heat pumps, etc.), and should be complemented by further analysis to identify and compare the economic benefits of different pathways in a robust manner. The CBA phase should provide a detailed analysis of the benefits of each project (interconnectors for electricity, interconnectors for gas, power-to-gas units, etc.) in all relevant sectors. The results of this phase could lead to identify potential gaps with the results of the scenario-building phase, because the scenario-building phase is based on a more aggregated representation of the energy system and of the infrastructures projects.

At the same time, it is important to point out that each sector will still have to run sector-specific analyses to identify its concrete system needs, allowing to refine the holistic view provided by the earlier steps in the procedure.

Building on this, stakeholder involvement should be strengthened at all stages of the process. Stakeholder collaboration should occur at the same stages as they do in current TYNDPs (i.e., scenario building and final consultation), and especially in the development of the qualitative part of the scenario-building process, similar to the existing storylines. Moreover, stakeholder input to the different assumptions (e.g.: input data for models) is key to increase the transparency of the results. Furthermore, cross-sectorial projects covering two or more sectors should be analysed and used for this adjustment as well. Integrating stakeholders’ feedback between scenario-building and sectorial investigation should be maintained.

Policy should follow the pace and provide an enabling framework for innovative solutions to emerge in the longer term. The TEN-E revision should reflect these paradigm shifts and the need for a long-term holistic vision for system planning including an approach/framework that allows to integrate and coordinate various coupling solutions for different infrastructures through different network elements in an optimal manner. Prioritizing cross-sectorial investments should take into account a cost-benefit analysis that reflects societal benefits and costs across sectors.

The timely completion of projected investment programs for smart and sustainable infrastructure networks and for the digital transformation at both national, regional and European level through the TYNDPs will be essential for the EU decarbonization efforts.

To what extent do you agree with the following statements on the selection criteria for projects of common interest?

	Completely agree	Agree	Neither agree nor disagree	Disagree	Completely disagree	Do not know
* The general selection criteria are appropriate.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* The specific selection criteria for electricity transmission projects are appropriate.	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

* The specific selection criteria for gas projects are appropriate.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
The specific selection criteria for electricity smart grid projects are appropriate.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* The specific selection criteria for carbon dioxide transport projects are appropriate.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

If you disagree, please specify changes you consider necessary:

The cross-border impact of a project is still very relevant. However, the current criteria of 500MW needs to be reshaped.

With regard to eligibility criteria, new factors, such as digitization, offshore renewables (e.g. support the connection of large MRE production hubs or scalable connection projects likely to eventually accommodate a large volume (>500 MW per cluster)) and links with third countries should also be taken into account.

To what extent do you agree that projects of mutual interest with third countries should be included in the revised TEN-E framework?

	Completely agree	Agree	Neither agree nor disagree	Disagree	Completely disagree	Do not know
* Projects of mutual interest, i. e. projects with third country that benefit only one Member State, should remain outside the TEN-E framework.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
* Projects of mutual interest should be included in the TEN-E framework...	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* ...subject to specific eligibility and selection criteria,	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* ...subject to a specific selection process	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* ...subject to specific conditions for regulatory	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

measures and access to financial assistance would apply.						
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Please specify your answer:

The inclusion of this kind of projects will necessarily imply a specific regime (as the whole project would not be covered by the regulation and the other relevant EU rules). In addition, there is a need to adapt the criteria of cross-border impact assessment in these cases, always acknowledging the necessity of considering projects of pan-European relevance.

Section 5 Governance and the roles of different actors

To what extent do you agree with the following statements concerning the effectiveness of the PCI monitoring and implementation planning procedures?

	Completely agree	Agree	Neither agree nor disagree	Disagree	Completely disagree	Do not know
* Current reporting and monitoring procedures on the PCI progress [popup box: i.e. Activity Status Reports, ACER monitoring reports, Transparency Platform etc.] are sufficient to ensure transparency on PCI development.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* PCIs implementation plans and the regular updates ensure timely project implementation.	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please explain your answer:

Current reporting procedures are sufficient or even redundant. Monitoring can help the implementation of the project if there are incentives to respect milestones. Implementation plans are certainly useful, yearly update through PCI monitoring should be enough. It should be noted that they always capture a certain moment in time and cannot be regarded as a set-in-stone projection of the future. Furthermore, monitoring activities should be as efficient and lean as possible. Instead of answering a yearly questionnaire, the monitoring could focus only on specific changes in regard of the project and its implementation.

To what extent do you agree with the following statements concerning governance?

	Completely agree	Agree	Neither agree nor disagree	Disagree	Completely disagree	Do not know
* The Regional Group model enables regional cooperation.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* High Level Groups provide added value through strategic steering and political guidance as well as monitoring the PCIs in the priority regions.	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* It is effective that NRAs are responsible for CBCA decisions.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please share your suggestions with regard to improvements in the governance process:

Regional groups are facilitators, but regional cooperation sometimes needs other layers as some regions are too large to have a shared regional interest.
The CBCA process should remain in the hands of NRAs, but be simplified nonetheless.

Section 6: Cross-border cost allocation

*** Have you ever requested a cross-border cost allocation decision as part of one of your PCIs?**

- Yes
- No
- Do not know

*

What was the main reason for you to request a CBCA decision?

Project promoters who would like to receive CEF funds have to formally request a CBCA decision, because it is a necessary precondition to receive the funding. Therefore, access to CEF funds is often the reason for a CBCA request. However, and on the other hand, the burdensome CBCA request might be an obstacle for project promoters to apply for CEF funding.

* In your opinion, what are the main reasons for project promoters to request a CBCA decision?

Project promoters who would like to receive CEF funds have to formally request a CBCA decision, because it is a necessary precondition to receive the funding. Therefore, access to CEF funds is often the reason for a CBCA request. However, and on the other hand, the burdensome CBCA request might be an obstacle for project promoters to apply for CEF funding.

* To what extent would you agree that CBCA decision processes and outcomes enable effective investment decisions?

- Completely agree
- Agree
- Neither agree nor disagree
- Disagree
- Completely disagree
- Do not know

* Please explain your answer, possibly comparing with other means of taking CBCA decisions:

Investment decisions for projects are typically based on a cost benefit analysis. From a project promoter's perspective, it is economically reasonable to invest if the benefits outweigh the costs of a project.

Having access to adequate means to finance a project is another issue to be considered by a project promoter. At this point, the CBCA might, to some extent, influence the decision to realize the project or not. Where the financing of a project is generally ensured however, the CBCA is not decisive from the investor's point of view. Project promoters cooperate very closely and there exists positive experience with realizing projects without the need of a CBCA.

In the regulated business, environment incentives should be provided by national regulatory systems to enable required investments.

Our experience of the CBCA application is that the process and the evaluation are very complex, challenging and time-consuming. From our perspective, CBCA has not proven to be the instrument supporting the target to enable and accelerate projects.

Where needed to enable or contribute to the implementation of approved PCIs, the allocation of EU funds should be supplied so as to support the goals of TEN-E, such as market integration, climate targets and security of supply. A wide range of financial instruments can be provided, not only grants. Studies have been performed to evaluate which financial instruments are needed. Infrastructure projects can deliver added value also for other business branches.

In any case, the allocation of EU funds does support the realisation of projects.

The CBCA process as such needs to be simplified and amended in order to create efficient outcomes:

- Make the CBCA's use rare: Ideally the use of CBCA should be avoided. In any case, CBCA should be used as a very rare exception for projects that would not materialise otherwise. Decoupling of CEF funding from CBCA is useful in this regard.
- Apply only if necessary: if hosting countries find an agreement on cost-sharing, the CBCA should not be requested (also because it is time-consuming and it lengthens the implementation of the project).
- Make the CBCA process fair: Abolition or adjustment of the 10 % threshold (see ACER CBCA recommendation) or at least adjustment in respect to the size of the countries.
- Make it simple and pragmatic: Standardize and simplify the CBCA process and cost-sharing rules. The number of involved parties / Member States should be as small as possible.
- Reduce financial risks associated with a payment: Due to the time difference between CBCA payment and cost recovery on a national level, pre-financing costs will emerge. It is very important that cost recovery of CBCA prevents deterioration of credit rating. A solution could be that non-costing countries bear periodic payments (instead of lump sum payments). For non-hosting countries, the CBCA project should be validated by hosting ones. To support project realisation, project promoters and hosting countries should consider adapting the governance of the project to include non-hosting paying countries.
- Regarding the broader public acceptance of EU cost-sharing approaches, it is crucial that non-hosting countries do not pay more than they benefit from a project and contribute to the funding of CBCA projects only on a voluntary basis.
- In the light of the post-COVID recovery, access to EU funds should be simplified and skip expensive CBCA procedures.

Section 7: Investment incentives

According to Article 13 of the TEN-E Regulation, incentives can be provided for PCIs which are exposed to higher risks than normally incurred by a similar infrastructure project, and for which a net positive impact is confirmed by the CBA.

* To what extent would you agree that investment incentives enable effective investments in PCIs?

- Completely agree
- Agree
- Neither agree nor disagree
- Disagree
- Completely disagree
- Do not know

Please explain your answer:

Incentives should be provided by national regulatory systems to enable required investments. This precondition is not restricted to incentives according to Article 13 of the TEN-E Regulation. It is of utmost importance that in general the national regulatory framework provides enough stipulation for investment projects.

Risk management is critical for project promoters. It is a powerful tool to enable projects with a positive CBA, but that require high levels of investment with a medium to long term level of commitment from the investors. Investment incentives should be extended and better explained, linking them to the concept of high risk. Investment incentives should not only take financial but also real risks and (for instance) uncertainty about scenarios into account.

*** Have you requested investment incentives for your projects?**

- Yes
- No
- Do not know

*** What was the nature of the incentives?**

- Stability provisions (longer regulatory periods)
- Adjusted depreciation period
- Anticipatory investment
- Premium on Weighted Average Cost of Capital
- Other [please specify]

Please specify your answer:

Section 8: Efficiency of the Regulation

The evaluation of the efficiency of the Regulation considers the extent to which the resources used to implement the Regulation and achieve its objectives are used as efficiently as possible (with lowest possible resources /costs). In the case of the TEN-E Regulation, this mainly relates to the costs and benefits for NRAs and project promoters with regards to the implementation of the Regulation.

As a project promoter/TSO, to what extent do the following provisions trigger costs for your organisation?

	Very high costs	High costs	Acceptable costs	No costs at all	Do not know
* Participation in regional groups	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Permitting processes	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* PCI reporting & monitoring	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
*					

The organisation of stakeholder consultations (public participation obligations)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* CBCA process	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Application of incentives granted by NRA	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Other costs (please specify)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please specify your answer:

Regarding administrative burdens and costs, the need for a simplification of the CBCA process must be repeated. Permitting expenses and costs linked to stakeholder involvement must be recognized.

Possibilities of remote participation in regional groups events should be positively highlighted. To reduce emissions and costs for the society, remote participation could be further extended (not only 'listening mode' but also 'active participation').

For the provisions identified as having 'very high' and 'high costs', could you estimate the number of FTEs and out-of-pocket costs (i.e. consulting, lawyer fees) require for these activities?

*** To what extent do you agree that the TEN-E Regulation PCI status has reduced administrative costs for project promoters?**

- Completely agree
- Agree
- Neither agree nor disagree
- Disagree
- Completely disagree
- Do not know

Please explain your answer:

Some aspects of the TEN-E Regulation result in a reduction of administrative burdens (one stop shop solution), whereas others create significant additional administrative burdens (frequent selection process, monitoring exercises, etc.).

For the provisions identified as having 'very high' and 'high costs', could you estimate the number of FTEs and out-of-pocket costs (i.e. consulting, lawyer fees) require for these activities?

*** To what extent do you agree that the benefits of the provisions in the TEN-E Regulation outweigh the costs?**

- Completely agree
- Agree
- Neither agree nor disagree
- Disagree
- Completely disagree
- Do not know

Please explain your answer:

Overall, the Regulation does create palpable benefits for the development of energy infrastructure in the EU. But the benefits of the PCI status do not always and in all situations outweigh their costs in terms of administrative effort.

Can you identify any opportunities to simplify the legislation or reduce unnecessary costs without undermining the intended objectives of the Regulation?

- Shorten/simplify and reduce the rhythm of PCI selection process and limit corresponding meetings to the necessary minimum;
- Extend possibilities of remote participation in regional group meeting. Allow not only 'listening mode' but also active participation;
- Re-evaluate if prescribed steps in permitting are still needed or if they – in the meantime – have been adopted by all Member States as state-of-the-art and are no longer necessary on a European level;
- On public consultations, there is also room for improvement (see examples in the section on public consultation).

*** To what extent do you agree that the current reporting and monitoring procedures on the PCI progress can be simplified and still fulfill their purpose?**

- Completely agree
- Agree
- Neither agree nor disagree
- Disagree
- Completely disagree
- Do not know

Please explain your answer:

There is room for improvement. Not all questions in the PCI monitoring process are relevant. The new SWITCH application has some serious flaws and could be more user-friendly. Maybe one could try to reduce overlaps and redundancies in reporting between PCI monitoring, transparency platform and PCI selection process.

Section 9: Relevance of the Regulation

The evaluation of the relevance of the TEN-E Regulation assesses the extent to which the TEN-E Regulation and its objectives appropriately respond to the changes in energy infrastructure needs and in the policy context (such as the climate neutrality objective under the European Green Deal).

To what extent do you agree that the following issues are currently well addressed by the Regulation?

	Completely agree	Agree	Neither agree nor disagree	Disagree	Completely disagree	Do not know
* Integration of renewable energy sources into the electricity network	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Integration of renewable energy sources into the gas network	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Support of electrification of transport through appropriate grid infrastructure	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Smart sector integration	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Energy transition for fossil fuel regions	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Climate change mitigation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Climate resilience of energy infrastructure	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Improving energy efficiency of the energy system	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

If you ticked 'Completely disagree' or 'Disagree': How do you think the Regulation should change to better address these issues?

We recognize that the TEN-E Regulation needs to be updated to be more aligned with Green Deal objectives.

For smart sector integration, a lot has been achieved already. The scenario-building for the TYNDP is a joint electricity and gas exercise with enhanced stakeholder involvement and first steps have been taken towards interlinked project assessment. In addition, TEN-E priority corridors could be redefined based on a joint

proposal from ENTSO-E and ENTSO-G and be joint gas-electricity-hydrogen corridors.

Regarding electrification of transport: The Regulation was established to support the development and interoperability of trans-European energy networks, irrespective of the evolution of the sector.

On climate resilience and climate mitigation: the CBA methodology of the TYNDP contains a CO2 indicator that is highly relevant for assessing a project's contribution to climate objectives. However, the TEN-E could provide further incentives in that regard. On their own initiative, ENTSO-E and ENTSO-G have included for the first time in the scenarios of the TYNDP2020 two scenarios designed to reach the Paris Agreement objective of keeping temperature rise below 1,5C.

To what extent would you agree that the TEN-E Regulation has been relevant in supporting the development of the following infrastructure categories?

	Completely agree	Agree	Neither agree nor disagree	Disagree	Completely disagree	Do not know
* High-voltage overhead transmission lines	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Electricity storage facilities	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Safety and efficiency installations for electricity	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Smart grids	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Transmission pipelines for natural gas and biogas	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Underground gas storage facilities	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* reception, storage and regasification or decompression of liquefied natural gas (LNG) or compressed	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* natural gas (CNG)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Safety and efficiency installations for gas	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Pipelines for crude oil	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Oil pumping and storage facilities	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Safety and efficiency installations for oil	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

* Dedicated carbon dioxide pipelines	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Facilities for liquefaction of carbon dioxide and buffer storage	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Safety and efficiency installations for carbon dioxide	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

*** Which of the challenges would you say are most important to address in the field of energy infrastructure today, compared to the situation in 2013? Please select up to 3 most important challenges.**

at most 3 choice(s)

- Permit-granting procedures
- Energy efficiency first principle
- Greenhouse gas emission reductions / climate neutrality
- Regulatory cross-border challenges
- Market fragmentation / market integration
- Other (please specify)
- Energy infrastructure investments
- Competitiveness of the EU energy market
- Energy financing capacity of TSOs
- Energy system integration
- Commercial viability of projects
- Security of supply
- Cross-border/regional cooperation
- Environmental due diligence in the preparation, permitting and implementation of project
- Integration of renewable energy sources
- Public opposition to projects
- Digitalisation

*** Which of the challenges would you say are least important to address in the field of energy infrastructure today, compared to the situation in 2013? Please select up to 3 least important challenges.**

at most 3 choice(s)

- Greenhouse gas emission reductions / climate neutrality
- Regulatory cross-border challenges
- Cross-border/regional cooperation
- Energy infrastructure investments
- Commercial viability of projects
- Digitalisation
- Integration of renewable energy sources
- Market fragmentation / market integration

- Public opposition to projects
- Energy financing capacity of TSOs
- Competitiveness of the EU energy market
- Other (please specify)
- Security of supply
- Energy efficiency first principle
- Energy system integration
- Environmental due diligence in the preparation, permitting and implementation of project
- Permit-granting procedures

Which features do you consider the most important for a project of common interest (PCI) as part of trans-European energy network?

	Important	Important to a large extent	Important to a small extent	Not important	Do not know
* Integration of renewable energy sources into the grid	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Contribution to greenhouse gas emissions reduction / fully consistent with climate neutrality 2050	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Security of supply	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Market integration (e.g. to reduce infrastructural deficits and increase system flexibility)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Increase competition on the market	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Innovation	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Environmental due diligence in the preparation, permitting and implementation of project	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Generation of direct benefits to the local communities	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

Which of the following infrastructure categories do you consider relevant for the regulatory framework on trans-European energy networks?

	Relevant	Relevant to a large extent	Relevant to a small extent	Not relevant	Do not know
Electricity infrastructure (transmission lines and storage)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Grids for offshore renewable energy	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Smart electricity grids	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Smart gas grids	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Natural gas infrastructure (pipelines and storage)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Liquefied Natural Gas (LNG) terminals	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Dedicated hydrogen (H2) networks	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Infrastructure for the integration of renewable and carbon neutral gases	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Power-to-gas installations	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
CO2 networks (for transporting CO2)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Geological storage of CO2	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

The TEN-E Regulation presents nine Priority corridors: North Seas offshore grid (NSOG), North-south electricity interconnections in western Europe (NSI West Electricity), North-south electricity interconnections in central eastern and south eastern Europe (NSI East Electricity), Baltic Energy Market Interconnection Plan in electricity (BEMIP Electricity), North-south gas interconnections in Western Europe (NSI West Gas), North-south gas interconnections in central eastern and south eastern Europe (NSI East Gas), Southern Gas Corridor (SGC), Baltic Energy Market Interconnection Plan in gas (BEMIP Gas), Oil supply connections in central eastern Europe (OSC).

The TEN-E Regulation also presents three Priority thematic areas: Smart grids deployment, Electricity highways, and Cross-border carbon dioxide network.

For more information, see: https://ec.europa.eu/energy/topics/infrastructure/trans-european-networks-energy_en?redir=1

To what extent do you agree with the following statements concerning priority corridors and thematic areas?

	Completely agree	Agree	Neither agree nor disagree	Disagree	Completely disagree	Do not know
* Priority Corridors reflect the current infrastructure needs	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Priority Corridors are fit for purpose for future challenges to the energy infrastructure	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

* Priority Thematic Areas reflect the current infrastructure needs	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Priority Thematic Areas are fit for purpose for future challenges to the energy infrastructure	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please explain your answer:

The geographical perimeter of the priority corridors could be modified to cover not only the Northern seas for the offshore grids. In addition, corridors could be redefined based on a joint proposal from ENTSO-E and ENTSO-G and be joint gas-electricity-hydrogen corridors.

Section 10: Coherence of the Regulation

Coherence is about the extent to which the objectives and the implementation of the activities related to the Regulation are non-contradictory (internal coherence), and do not contradict other activities with similar objectives (external coherence). Questions relate to whether there are any internal inconsistencies in the Regulation itself, as well as the degree to which it is coherent with other (EU) initiatives with similar objectives and its situation in the wider EU energy policy field.

* Can you identify any overlaps, inconsistencies within the TEN-E Regulation (including in its measures and objectives)?

- Yes, there are overlaps, inconsistencies or incoherencies
- No, the Regulation is coherent overall
- Do not know

Please state your opinion on the following statements regarding the consistency between the TEN-E Regulation and other policies/ initiatives at EU, international, and national level:

	Inconsistencies, or conflicts with the Regulation	Consistent with the regulation	Do not know
* The Clean Energy Package / the Energy Union	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
* The European Green Deal / Long Term Strategy for Decarbonisation	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Trans-European transport networks (TEN-T)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* EU environmental acquis (habitats, water, etc.)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
* EU Digital Strategy	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

* EU Industrial Strategy	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Paris Agreement	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* UN Sustainable Development Goals	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
* Commission communication on a stronger and renewed strategic partnership with the EU's outermost regions (COM(2017)623 final)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
* EU neighborhood policy	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

*** Please specify your answer, if possible, mentioning specific measures of the Regulation:**

In the context of the Green Deal objectives, more attention should be given to the CO2 indicator included in the current CBA methodology. Often, the focus of stakeholders and policymakers lies on the monetized part of the CBA. It is however important to note that the current CBA, in its non-monetized part, already contains a metric that is highly relevant for assessing a project's contribution to climate objectives.

Regarding the Industrial Strategy: the strengthening, at European level, of industrial sectors is essential to support the development of strategic infrastructures. Supporting the maintenance and development in Europe of service providers and manufacturers, specialists in key technologies for our electricity networks, will enable us to strengthen our energy, technological and industrial independence. It will also actively contribute to economic reconstruction.

Section 11: EU added value of the Regulation

EU added value concerns the extent to which changes can reasonably be argued to be a result of the EU intervention, over and above what could reasonably have been expected from national actions. Thus, it considers whether and to the extent to which it is justified in terms of the results it brought about compared to what could have been achieved by Member States themselves; and the extent to which the issues addressed by the TEN-E Regulation still require EU intervention (or, in other words, what the consequence of stopping the EU intervention would be).

*** What do you think has been the EU added value of the TEN-E Regulation, compared to what could have been achieved if legislation on energy infrastructure networks only existed at national or regional level?**

- Regional cooperation
- Cooperation gains
- Improved regulatory certainty
- Increased transparency
- Increased acceptance of energy infrastructure projects
- Enhanced compliance with environmental requirements
- Greater speed and/or effectiveness of delivery of projects
-

Certain projects could not have been implemented otherwise

- Access to financing (e.g. Connecting Europe Facility)
- Other, please specify

Please specify your answer:

On the following aspects, the answer is “partially yes”:

- Improved regulatory certainty
- Increased acceptance of energy infrastructure projects

Would the same results have been achieved legislating at national and/or regional level?

	Completely agree	Agree	Neither agree nor disagree	Disagree	Completely disagree	Do not know
* The TEN-E Regulation has achieved more results than what could have been achieved legislating at national and/or regional level.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* The issues addressed by the TEN-E Regulation continue to require action at EU level.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please explain your answer:

Developing the European grid requires action at supranational level. As Member State sovereignty regarding their territory is also at stake, EU action has mostly complemented, not supplemented, national action.

The achievement of the Green Deal objectives requires huge investments in grid infrastructure and tools of TEN-E will continue to be relevant. However, they must become more efficient to support decarbonization goals.

Section 12: Final questions

Would you be willing to take part in a follow-up interview to provide further feedback for the evaluation?

- Yes
- No

Please note that while we will do our best to contact everyone who wishes to participate in the interviews, we retain discretion on selection in order to achieve proportional representation.

*** Do you agree with the use of your email address to reach out for follow-up interviews?**

- Yes
- No

If you did not do so in the beginning, could you please include your email for us to contact you to schedule a follow-up interview:

Do you have any comments, remarks or information regarding this survey that you would like to share?

In Section 9, question ‘Which of the following infrastructure categories do you consider relevant for the regulatory framework on trans-European energy networks?’, our answer on the category ‘Grids for offshore renewable energy’ must be understood as applying to hybrid offshore grid.

In Section 9, question ‘Which of the challenges would you say are most important to address in the field of energy infrastructure today, compared to the situation in 2013? Please select up to 3 most important challenges’: we selected three as requested, but please note that we also see energy infrastructure investments and digitization as very important.

(Section 10) With regard to overlaps and inconsistencies within the Regulation: the Regulation is coherent overall. However, some provisions are a bit vague and difficult to implement in practice.

- « Commissioning » means the process of bringing a project into operation once it has been constructed (article 2 (11) : it is correct to define « Commissioning » as a « process ». This is because a number of tests need to be undertaken before the project is fully operational. However, the Regulation also makes a reference to « dates » in relation to commissioning (for example in article 5 para.7) which may be misleading.

- « Project of common interests (...) are also eligible for Union financial assistance in the form of grants for works if they fulfil all of the following criteria (...) the project has received a cross-border allocation decision pursuant to Article 12 » (article 14 para.2 lt.c) : on the other hand, the efficiently incurred investment costs of a project of common interest should be paid for by network users (article 12 para.1). There seems to be an inconsistency with the sequence : 1) the concerned NRA(s) must grant the CBCA ; 2) only after the CBCA has been received, then the PCI becomes eligible for a grant for works. How can a NRA accept to cover the costs of a project without having any visibility on the amounts that would be covered by a grant for works (which indeed may be substantial) ?

- « Enabling investment with cross-border impacts » (article 12) : « projects », « projects of common interest », « investment with cross border impacts », « interconnector » (Directive 2019/944), « interconnector » (Regulation 2019/943) : these concepts sometimes overlap. It would be useful to have a clear list of definitions in the Regulation.

- TEN-E Regulation Annex III Chapter 2. Point (5) requires the Commission by 16 January 2014 to issue Guidelines on criteria to be applied by ENTSO for electricity for TYNDP to ensure equal treatment and transparency of the process. One can read the Regulation to mean that January 2014 Guidelines are in force and to be relied upon until further notice to the contrary, including reasonable time to adapt to any revised Guideline. However, in practice the EC has been revising the Guideline for every TYNDP cycle and saying their revised Guideline being the precondition for due process, regardless when it is issued. In our opinion, the revised Regulation would benefit from clarifying if the revision is intended to be for every TYNDP cycle and perhaps setting a timeline for the Commission for issuing its revised version or announcing that the previous version of the Guideline applies.

Please share any relevant documents and data that would be useful for the purposes of our evaluation.

We kindly ask if you could please reflect all inputs, including those that are in your position papers, in the responses to the survey questions.

The maximum file size is 1 MB

Thank you very much for taking the time to answer this survey. Once you click “submit” below, your answers will be saved and sent. You will still be able to make changes if you reopen the survey link invitation sent to your email address.

Your answers will be treated fully confidentially and not be shared with anyone else.

If you have any questions about this survey, please contact TEN-E@ramboll.com.

Contact

ener-b1-projects@ec.europa.eu