



# SUBMISSION TO THE CONSULTATION ON THE ENTSOG ANNUAL WORK PROGRAMME 2020

6 September 2019

*Climate Action Network (CAN) Europe is Europe's largest coalition working on climate and energy issues. With over 130 member organisations in more than 30 European countries - representing over 44 million citizens - CAN Europe works to prevent dangerous climate change and promote sustainable climate and energy policy in Europe.*

**Q1: Does the AWP 2020 adequately identify activities which ENTSOG should prioritise?**

Yes.

**Further comments**

CAN Europe generally welcomes that ENTSOG mentions the development of scenarios meeting the COP 21 targets as an activity amongst the TYNDP 2020 deliverables. The planned inclusion of a new category of Energy Transition Related (ETR) projects appears to reflect the need to avoid deepening Europe's dependency on fossil fuels. In view of the fundamental changes in energy infrastructure linked to this challenge, giving priority to a Paris compatible energy infrastructure as a whole would have been adequate.

**Q2: Are there any other activities that should be included in the AWP 2020, or activities which should take priority within the document?**

Yes.

**If 'YES', what other activities should be addressed?**

Gas infrastructure needs to be made compatible with the 1.5°C target of the Paris Agreement and with the European Commission's long-term strategic vision for a climate-neutral economy.<sup>1</sup>

**Assess non-fossil gases in view of renewables' system integration**

CAN Europe encourages ENTSOG to substantiate how exactly electricity and gas grids can speed up the integration of massively increasing shares of variable renewable electricity in the most efficient way. This would

---

<sup>1</sup> The scenarios of the long-term strategic vision mostly show that there will be an overall reduction in demand for gaseous fuels. They also highlight a massive reduction in imports and thus a reduction in the need for import infrastructure. The role of natural gas will most probably decline dramatically. Many of the new so-called 'low carbon gases' that are put forward in the scenarios would require radically different business models.

entail a realistic assessment of the availability of different non-fossil gases and infrastructure costs related to their market introduction.

### **Clarify sustainability criterion**

Findings then would also have to be integrated into the Cost Benefit Analysis (CBA) methodology, in particular with regard to clarifying the sustainability criterion. The role of methane emissions leakage from existing and future gas infrastructure should be tackled when it comes to a holistic analysis of greenhouse gas emission reductions.

### **Improve interlinkage of all energy infrastructures**

Under the Scenarios and Infrastructure chapter, the Annual Work Programme should integrate in the TYNDP modelling a comprehensive cross-sectoral optimisation of all energy infrastructure in order to analyse synergies for the most cost-efficient use of electricity, heating, transport and gas infrastructures. CAN Europe highlights such improvements not only because of potential emission reductions but also to avoid stranded assets.

### **Increase transparency of modelling**

Data access for modelling should be added as a priority activity. Introducing an open data licence for TYNDP models would allow to enhance feedback and verification of modelling results by science, civil society and industries. Early information and appropriate capacity building for stakeholders are key for improving stakeholders' engagement. With regard to communication, it would be helpful to give priority to one single website that documents the TYNDP process and modelling for both ENTSOs.

### ***Are there elements of the AWP 2020 which should be excluded?***

No.

### ***Q3: Do you have any additional general comments?***

No.

### **Contact:**

Jörg Mühlenhoff  
Energy Scenarios Policy Coordinator  
[joerg@caneurope.org](mailto:joerg@caneurope.org)  
+32 2 894 4672

Transparency register no. 55888811123-49