

GRDF answer to ENTSOG Consultation on its Annual Work Programme (AWP) 2020

Organisation: Gas Distribution System Operator

Name: GRDF (France)

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

Yes, the AWP 2020 adequately identifies activities ENTSOG should prioritise.

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

No. However, in our opinion, a few points should be included in the existing description of the activities “Scenarios and Infrastructure” and “Security of Supply”.

1) *“Scenarios and Infrastructure”*

The description of the activity underlines that ENTSOG is considering feedback from stakeholders during consultations processes of TYNDPs. GRDF would like to highlight the contribution DSOs can bring to these consultations.

First, considering that DSOs are at the bottom of the gas value chain, they can bring insightful viewpoints on gas demand and usages as well as on aspects of sector coupling.

Secondly, ENTSOG underlined that “work will be undertaken on TYNDP 2020 which will improve the assessment of sustainability needs to meet the EU’s climate target”. DSOs responsibilities are increasingly important due to the energy and climate goals. Today, the large majority of biomethane production plants in France are connected to the distribution grid. Renewable gases will also increase the cooperation between DSOs and TSOs, particularly when a reverse flow installation is needed. Consequently, GRDF is expressing its willingness to see the role of DSOs being stressed in the AWP, with the objective of having more DSOs involved in the consultations for TYNDP 2020 and 2022.

2) *“Security of Supply”*

The description of the activity lists four objectives. Considering the EU climate and energy objectives GRDF thinks that a fifth objective should be considered by ENTSOG. This objective would be:

“Evaluate the contribution of decarbonised and renewable gases, as well as flexibility services to security of supply”.

Indeed, highlighting the future role of biomethane – which the DSO strongly believe in – is also highlighting the pertinence of the role that our European gas networks should continue to play in a future compliant with the EU climate ambitions.

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

No.

Q3: Do you have any additional general comments?

No.