

## ENTSO-E Annual Work Programme 2025 – Treatment of Stakeholder Comments

This document provides a summary of the remarks received during the pre-consultation in April 2024, as well as the public consultation held from 5 July to 9 August 2024, along with ENTSO-E's perspectives on these comments in relation to the Annual Work Programme (AWP) 2025. For ACER's reference, ENTSO-E conducted a public webinar on July 10, which took place during the public consultation period.

Stakeholder	Consultation phase	Do you think the Work Programme focuses on the right deliverables or should some be deleted or added?	On the individual work items do you have any specific comments?	What items from the AWP should be prioritised in the case of future unexpected circumstances causing disruptions/unintended consequences?	ENTSO-E perspective
EUGINE	Public Consultation	The work programme focuses on the right deliverables.	<p><b>1. Research, Development &amp; Innovation - Flexibility</b></p> <p>EUGINE, representing manufacturers of flexible engine power plants, very much welcomes that flexibility is recognised as a key priority by ENTSO-E. We note that work has already started on the methodology to support the flexibility needs assessment and that the delivery to ACER is planned for April 2025 as requested by the latest market design review.</p> <p>Flexibility needs assessments will be key in providing a market outlook and investment signals for all types of flexible technologies. Taking into account the high relevance of this work for equipment manufacturers and other stakeholders, EUGINE would have wished for a more specific description of the activities undertaken. (While this lack of details could be justified in the 2024 programme on the grounds of an ongoing legislative process, this is no longer the case.)</p> <p>EUGINE and its members firmly believe that the drafting process and stakeholder engagement leading to a methodology for the assessment of flexibility needs should be as transparent as possible. As manufacturers of equipment providing essential seasonal and long-term flexibility as well as system services, we stand ready to provide relevant technology-specific information to ENTSO-E in this process.</p> <p><b>2. System Development/Connection Network Codes</b></p> <p>Several IGDs must be revised. In addition, it could also be useful to consider drafting new IGDs to implement the</p>	Should any disruptions/unintended issues occur, we are of the view that priority should be given to the implementation of the actions mandated by the electricity market rules and their review (methodology for flexibility needs assessment, ERAA methodology review, etc.) We also very much look forward to learning more about the ENTSO-E workstream "System Flexibility Needs for the Energy Transition".	<p>Thank you very much for your comment and your availability to support this work which is of key importance for many stakeholders.</p> <p>ENTSO-E has already initiated the work with the EU DSO Entity – both sharing the same legal mandate to develop the Methodology that will support the analysis of the TSOs and DSOs of the national flexibility needs. The joint work is progressing in alignment with ACER and EC and is ramping up to meet the deadline of April 2025.</p> <p>In the development plan, an appropriate stakeholder engagement has been defined with some workshops, public webinar and consultation. Most of this work is scheduled to take place in 2024 due to the short timeline of the whole work. ENTSO-E fully supports a constructive stakeholder engagement for bringing benefit to the final Methodology and will make the best together with the EU DSO Entity to provide transparency of work and opportunities for feedback.</p> <p>Regarding the IGDs, existing IGDs that need to be updated according to the new regulation will be revised during the corresponding implementation period, after the entry into force of the amended regulation. Moreover, ENTSO-E is open to discuss, in the context of the Grid Connection European Stakeholder Committee, the release of an IGD on certification. The latter should reflect the recommendations of the Expert Group on Harmonized Certification and Family Grouping and account for the availability of the required resources.</p>

			<p>recommendations of the Expert Group on Harmonised Certification and Family Grouping.</p> <p>Page 17 mentions that ENTSO-E will “continue monitoring and providing recommendations where relevant on both new and existing standards”. This is stated as a one-way process; however, considering that standards define reasonable technical capabilities, it could be desirable to amend the IGDs to align them with the standards. This would indeed help to “achieve better alignment between standards and Network Codes”.</p>		<p>Regarding the standards and on achieving effective alignment, ENTSO-E supports the view that the relevant standards should undergo a revision process to comply with the amended Connection Network Codes regulation, once into force. The same process is foreseen for the outdated IGDs mentioned above.</p>
<b>EUTurbines</b>	Public Consultation	The work programme focuses on the right deliverables.	<p><b>Research, Development &amp; Innovation/Flexibility</b></p> <p>EUTurbines, representing manufacturers of flexible turbine power plants, very much welcomes that flexibility is recognised as a key priority by ENTSO-E. We note that work has already started on the methodology to support the flexibility needs assessment and that the delivery to ACER is planned for April 2025 as requested by the latest market design review.</p> <p>Flexibility needs assessments will be key in providing a market outlook and investment signals for all types of flexible technologies. Taking into account the high relevance of this work for equipment manufacturers and other stakeholders, EUTurbines regrets that a more specific description of the actions is missing. While the lack of details could be justified in the 2024 programme on the grounds of an ongoing legislative process, this is no longer the case.</p> <p>EUTurbines and its members firmly believe that the drafting process and stakeholder engagement leading to a methodology for the assessment of flexibility needs should be as transparent as possible. As manufacturers of equipment providing essential seasonal and long-term flexibility as well as system services, we stand ready to provide relevant technology-specific information to ENTSO-E in this process.</p> <p><b>System Development/Connection Network Codes</b></p>	<p>Should any disruptions/unintended issues occur, we are of the view that priority should be given to the implementation of the actions mandated by the electricity market rules and their review. The actions include, inter alia, methodology for flexibility needs assessment, ERAA methodology review, etc. We look forward to learning more about the ENTSO-E workstream “System Flexibility Needs for the Energy Transition”.</p>	<p>Thank you very much for your comment and your availability to support this work which is of key importance for many stakeholders.</p> <p>ENTSO-E has already initiated the work with the EU DSO Entity – both sharing the same legal mandate to develop the Methodology that will support the analysis of the TSOs and DSOs of the national flexibility needs. The joint work is progressing in alignment with ACER and EC and is ramping up to meet the deadline of April 2025.</p> <p>In the development plan, an appropriate stakeholder engagement has been defined with some workshops, public webinar and consultation. Most of this work is scheduled to take place in 2024 due to the short timeline of the whole work. ENTSO-E fully supports a constructive stakeholder engagement for bringing benefit to the final Methodology and will make the best together with the EU DSO Entity to provide transparency of work and opportunities for feedback.</p> <p>Regarding the IGDs, existing IGDs that need to be updated according to the new regulation will be revised during the corresponding implementation period, after the entry into force of the amended regulation. Moreover, ENTSO-E is open to discuss, in the context of the Grid Connection European Stakeholder Committee, the release of an IGD on certification. The latter should reflect the recommendations of the Expert Group on Harmonized Certification and Family Grouping and account for the availability of the required resources.</p>

			<p>Several IGDs must be revised. In addition, it could also be useful to consider drafting new IGDs to implement the recommendations of the Expert Group on Harmonised Certification and Family Grouping.</p> <p>Page 17 mentions that ENTSO-E will “continue monitoring and providing recommendations where relevant on both new and existing standards”. This is stated as a one-way process; however, considering that standards define reasonable technical capabilities, it could be necessary to amend the IGDs to align them with the standards. This would indeed help to “achieve better alignment between standards and Network Codes”.</p> <p>Since IGDs are relevant for TSOs, they must be as relevant and neutral as possible, providing information that supports sound decision-making. Consequently, the IGD process should be revised to involve manufacturers and stakeholders in the drafting process and to incorporate their feedback into the final document.</p> <p>Based on the available technology, EUTurbines expects progress in studies on frequency and voltage stability, and short circuit contributions. For example, the Inertia Phase II study should consider an inertia market with solutions like synchronous condensing and PtoXtoP, which help preserve system inertia, short circuit contribution, and voltage support. These technologies affect conventional and renewable system representations by requiring input from manufacturers. EUTurbines is keen to participate in formulating this input.</p>		<p>Regarding the involvement of manufacturers and stakeholders in the IGD process, ENTSO-E welcomes any relevant feedback through the dedicated consultation windows. Please note that, according to the current regulation, ENTSO-E is the entity legally mandated for drafting and publishing the IGDs, as non-binding guidance for TSOs to support the national implementation of the connection network codes. Moreover, each IGD undergoes a public consultation process, open to stakeholders’ feedback before its publication. According to the availability of dedicated resources, ENTSO-E may also decide to promote Technical Groups involving manufacturers and stakeholders on selected topics before initiating the drafting phase, to account for any relevant input and stakeholder perspectives.</p> <p>Regarding the standards and on achieving effective alignment, ENTSO-E supports the view that the relevant standards should undergo a revision process to comply with the amended Connection Network Codes regulation, once into force. The same process is foreseen for the outdated IGDs mentioned above.</p>
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