

# **TYNDP 2024 GUIDANCE FOR APPLICANTS – ANSWERS TO PUBLIC CONSULTATION COMMENTS**

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### **Organisation: AquaVentus Förderverein**

*Q: My comment I mentioned already to Dante Powell after his presentation last week in Brussels. It is regarding the offshore modelling and the offshore hubs assumption (page 22 of modelling methodologies presentation). Here it says: "The length of the infrastructure to shore will be distance to shoreline + 30 km". I am convinced that 30km inland is at least for Germany does not reflect reality. The distance from Wilhelmshaven (sea-cable landing point) to Lingen (electricity distribution point) - In Lingen Kernkraftwerk Emsland is located with sufficient power grid connections - is around 150km. That connection point is the closest to shore for power grids.*

**A: ENTSO-E believes there might be a misinterpretation. The intention is not to consider the distance from the offshore site to the onshore connection point as "offshore distance + 30 km." Instead, the correct interpretation is that the modeled distance from the offshore site to the shore represents the "shortest distance (straight-line) + 30 km**

*Q: To avoid curtailment and re-dispatch further power grid expansion in Germany is needed and urgently required to transport the offshore electricity amounts to the demand centres in Southern Germany. Therefore, I suggest a minimum length of onshore power grid infrastructure of 250km.*

**A: The provision has been misunderstood. Therefore, ENTSO-E has to decline this request. The necessity for an onshore connection point is contingent on a holistic system optimization. The optimal location may be either closer or farther than 250 km, depending on comprehensive considerations.**

*Q: With the resolution of the "Maritime Resilience Motion" of the German parliament on 06.07.2023 addresses the 10GW aim of Germany for offshore-hydrogen-production by 2035. This is a long-term and sustainable perspective for offshore electrolysis and thus will become the German contribution for Green Hydrogen from the high seas.*

**A: Thank you for the comment. If you consider appropriate you can participate in the scenarios' public consultations, where this information could be relevant.**

## Organization: Enel Group

*Q: The meaning of the sentence of this guidance (page 13) is not clear: "All projects, both cross border and internal, that intend to apply to the PCI label must demonstrate at least 500 MW impact in a cross-section between two (or more) Member States according to the "eligibility criteria" from Reg. 869 (TEN-E)." As far as we understood, the 500 MW impact refers only to the case where the cross border project is located on the territory of one Member State, as indicated in art. 4, point 1.c (ii) of the TEN-E (Reg. EU 2022/896). While, as indicated in the art. 4, point 1.c (i) of the TEN-E, "the project which involves at least two Member States by directly or indirectly, via interconnection with a third country, crossing the border of two or more Member States" do not have to demonstrate the 500 MW ea*

**A: The Guidance refers to the TEN-E Regulation as it has been interpreted and applied by the European Commission in all PCI processes so far. For questions on how to interpret eligibility rules to the PCI process, stakeholders are invited to contact the European Commission directly.**

*Q: It would be useful that the Cross Border Projects and the Internal Projects be assessed separately, in order to differently valorize the needs addressed by these two distinct kinds of projects. Indeed, the Cross-Border Projects address the 15% interconnection target and help to reduce the price differentials between the Countries;*

**A: Probably the statement meant "differently" instead of "separately"? ENTSO-E believes that the Cost-Benefit Analysis (CBA) has already taken this into consideration. Internal projects with cross border impact are assessed in the same way as cross-border projects. Internal projects that do not have impact on cross border are assessed in a different way as described in the CBA guidelines (Internal redispatch).**

*Q: Another possible separation to be evaluated could be related to private projects (called Merchant Lines) and regulated projects to valorize the contribution of private investments whose costs are not borne by the customers. Indeed, the regulated projects recover the investments costs obtaining revenues by a regulated tariff (RAB) paid by the customers. On the contrary, according to the Reg. EU 943/2019, the costs of the private investments are to be borne by the project promoters and there are no additional costs for end users;*

**A: ENTSO-E's CBA approach centres around the evaluation of Social Economic Welfare, where the entity responsible for bearing the cost holds no significance if private or public. ENTSO-E is not modelling end-user tariffs, so this benefit is not seen in ENTSO-E's calculation. If you want to contribute to the CBA indicators, you can participate in the public consultation on the CBA and its implementation guidelines.**

*Q: The costs of the project should have a figurative discount for sustainability. Indeed, the measures taken in order to reduce the environmental impact of the work (e.g. an underground cable) have a cost that today is making up the overall cost. Yet, this extra cost has an immediate benefit for the local communities affected by the project and it should be properly taking into account in order to boost the project and not to hinder it in the CBA;*

**A: Considering the environmental impact is essential. ENTSO-E currently evaluates environmental impact (S1) indicator. However, this indicator is not monetised. S1 indicator can have negative or positive impact. This matter should be directed to the CBA Guidelines or Implementation Guidelines (public consultation on TYNDP 2024 draft Implementation Guidelines is upcoming from early September to mid-October 2023) rather than the Project Promoters Guidelines.**

*Q: in the text of the guidance "Annex 3" (page 33), reference is made to TYNDP 2020 but, as far as we understood, the TYNDP 2022 should be taken as a reference.*

**A: Thank you for your comment this will be corrected in the final Guidance for Promoters.**

**Organization: Anonymous**

Q: TYNDP 2024 Guidance for Applicants for the first time requires promoters to provide a study demonstrating NTC increase due to the promoted project. The guidance is ambiguous on the methodology for the study with the only reference being to CBA Guidelines and Implementation Guidelines being “best practice”. Lack of specific requirements for the study creates an impossible situation for third-party promoters whereby they have to incur significant cost and time undertaking some analysis without any certainty that such analysis will be accepted.

Furthermore, we understand that the NTC calculation according to CBA Guideline is based on a network or load flow model. Such calculation can only be performed by ENTSO-E or possibly national TSOs. Third party promoters, nor its consultants, do not have access to a full load flow model and cannot possibly undertake such assessment. This is acknowledged in the ACER’s opinion of TYNDP 2022 on page 20: “The additional transfer capabilities of each project should be calculated by ENTISOE with more granularity instead of calculating a yearly NTC (e.g. at least seasonal NTCs). Furthermore, ENTSO-E should improve the transparency of the NTC Calculations... By providing more information on the selection of the critical branches / critical outages, clarifications on the selected climatic year, and by making available within the TYNDP package full details on the power or load shift applied, especially for the projects of third party promoters.”. Annex III.2 (5) of Regulation (EU) 2022/869 requires ENTSO-E to adopt guidelines for the inclusion in the TYNDP that ensure equal treatment of the promoters. But if a requirement for a NTS study according to the CBA remains, it will significantly undermine equal treatment as only national TSOs will be capable to meet such a requirement.

It will be very appreciated if a requirement for the study is reviewed and the Guidance in that part is reverted to the version used in TYNDP 2022.

**A: There is no acceptance process. Project promoters are requested to submit the study, which is mandatory, but the content of the supporting technical documentation is not the matter of acceptance or not in the TYNDP process. The supporting documentation is needed to understand how the NTC was calculated, did the project promoter consider only the thermal capacity of the line or did the project promoter perform a study. Was the TSO involved in the study. What grid model did you use, what is the year and the scenario used in the computation. Is the study publicly available in English. For projects fulfilling administrative criteria between e and i; an NTC study, in many cases made by a/several TSO is already available either if it is a 3rd party project; and in that case possibly assessed by an NRA.**

## Organization: FOSG

*Q: The draft Guidance document comes much too late and in addition in the middle of the summer break. During the webinar early July, it was mentioned by the ENTSO-E representative that people could also ask questions in writing on the draft Guidance : not really useful as most of the staff appears to be out of office.*

*We do not understand why it took so long for ENTSO-E to publish this draft Guidance.*

*In addition, the time left between publication of the final draft and the TYNDP application period is not long enough either.*

**A: Comprehensive responses to the inquiries were duly provided on 07/08. ENTSO-E acknowledges your concerns regarding its arrival during the summer break. ENTSO-E understands the significance of the timing in relation to the ongoing holiday season. It is worth noting that the draft Guidance was made available on 26/06, with a few notable updates from the previous cycle. To support project promoters ENTSO-E has planned 2 public webinars, one in July and one in September.**

**ENTSO-E acknowledges the compressed timeline, a direct result of the heightened intricacies intrinsic to the process. ENTSO-E is fully committed to optimizing the available time, leveraging its best efforts to ensure a comprehensive and supportive process despite these challenges.**

*Q: We do not understand why ENTSO-E reduces the scope of the TEN-E only to TSOs member of ENTSO-E or countries member of ENTSO-E : this seems to exclude EU Member States not member of ENTSO-E (such as Malta).*

*We suggest the reference to "ENTSO-E members" should be deleted in order to be compliant with the TEN-E regulation (for reference : the TEN-E Regulation clearly references a country such as Malta is in several "corridors" : thus no reason at all to indirectly exclude possible projects with Malta or other countries in the same situation).*

**A: Malta is actually the only EU MS which is not a member of ENTSO-E, because it does not have a TSO. And even so, it does not prevent projects involving Malta to be considered in the TYNDP I.e. a project of interconnector between Italy and Malta was assessed in TYNDP 2022. ENTSO-E does has update the wording in the text of the Guidance to include also projects that would connect Malta.**

*Q: Also, ENTSO-E unilaterally limits the scope of "radial" transmission to "offshore radial" (Entso-E Guidance*

*"The notion of transmission projects includes offshore radial and hybrid projects"). Radial could very well connect cross border onshore. No reason nor justification to limit to "offshore".*

**A: As referred in the ANNEX IV of the TEN-E regulation "RULES AND INDICATORS CONCERNING CRITERIA FOR PROJECTS":(1) A project of common interest with a significant cross-border impact shall be a project on the territory of a Member State and shall fulfil the following conditions: h) for offshore renewable electricity transmission, the project is designed to transfer electricity from offshore generation sites with capacity of at least 500 MW and allows for electricity transmission to onshore grid of a specific Member State, increasing the volume of renewable electricity available on the internal market. The project shall be developed in the**

**areas with low penetration of offshore renewable electricity and shall demonstrate a significant positive impact on the Union's 2030 targets for energy and climate and its 2050 climate neutrality objective and shall contribute significantly to the sustainability of the energy system and market integration while not hindering the cross-border capacities and flows. TEN-E mentions only the offshore that is why it**

Q: the addition of the new NTC requirement is not clear. The required technical information on NTC is unclear. It was mentioned by ENTSO-E representative during the webinar in July that "providing some information on the NTC" would be sufficient. This is totally unclear. We asked ENTSO-E for clarification but did not receive any.

NTC needs to be clearly defined and the requirements must be explained and detailed.

Considering the lack of quality information on this NTC criteria and the available time between the final Guidance and the Application, promoters will not have sufficient time to provide adequate NTC information. Therefore, the new NTC reference should be deleted

The draft Guidance require info on cost of generation but does not provide more details on same. Same comment as for NTC for same reasons : delete

**A: Promoter are requested to submit supporting documentation on how the NTC has been calculated. However, this does not constitute a criteria of acceptance for the TYNDP. Project promoters are requested to submit the study, which is mandatory, but the content of the supporting technical documentation is not the matter of acceptance or not in the TYNDP process. The supporting documentation is needed to understand how the NTC was calculated, did the project promoter consider only the thermal capacity of the line or did the project promoter perform a study. Was the TSO involved in the study. What grid model did you use, what is the year and the scenario used in the computation. Is the study publicly available in English. For projects fulfilling administrative criteria between e and i; an NTC study, in many cases made by a/several TSO is already available either if it is a 3rd party project; and in that case possibly assessed by an NRA. For projects under criteria j (TSO agreement) or k (under study), it is understandable that is more difficult as the project is still in a preliminary stage. The intention here is that the project promoter provides the study supporting the value of dNTC considered (dNTC value was also asked in previous guidelines) for ENTISOE knowledge. It won't be the cause for a rejection in the TYNDP.**

Q: the Guidance mentions :

"The TYNDP 2024 project list will be consulted within the TYNDP 2024 package, and may be modified in the final TYNDP 2024 if decided by ENTSO-E following either a reassessment or new information on the eligibility of projects, advice from the review process described in Section 3.3 or the recommendation of ACER included in its opinion.

In the event where new information that causes the project to be ineligible to TYNDP becomes available, ENTSO-E reserves the right to exclude the project from TYNDP."

This unilateral process and decision making by ENTSO-E without adequate justification is not

acceptable and violates rules of fair treatment.

The appeal procedure is still "at will" of Entso-e and totally unilateral. After so many years of TYNDP experience, this appeal process should be handled correctly, via a neutral panel and without active role of Entso-e as "judge and party". Really not acceptable considering the importance of the concerned projects.

**A: The first comment has no basis. As specified on page 23 of the Guidance, promoters will be informed of the reasons for a decision on the ineligibility of the project.**

**The appeal procedure involves the promoter, stakeholders including the EC and ACER, and ENTSO-E. Please keep in mind that ENTSO-E is ultimately legally responsible for the respect of the rules specified in the Guidance and for the content of the TYNDP.**

Q: ENTSO-E appears to be still totally understaffed considering the importance of the TYNDP. The process, notwithstanding years of experience, still comes too late in the calendar and does not give sufficient time to the promoters to prepare correctly their application. Quite disappointing.

**A: The Guidance for promoters is edited between each TYNDP cycle, always starting and improving from the version of the previous process.**

**This process allows promoters to prepare early for the next TYNDP process, knowing that requirements for inclusion in the TYNDP evolve usually very little from one edition to the next. ENTSO-E therefore contests your view that promoters do not have sufficient time to prepare their application correctly.**

**Please also note that ACER in its opinion evaluates the fair treatment of promoters, we invite you to read their opinion on TYNDP 2022.**

**Organization: Anonymous**

Q: We are writing to provide feedback on the recent changes proposed in the ENTSO-E Guidance for Applicants for the TYNDP 2024 cycle, specifically regarding the new NTC technical study requirement (referring to the supporting technical document of criteria o. Initial estimation of the Transfer capacity increase). While we appreciate the effort to improve the process, we have identified some concerns that we believe are essential to address for a smoother and more effective implementation.

The introduction of the NTC technical study requirement is commendable in its intent to enhance network planning and ensure a robust evaluation of projects. However, we would like to highlight a significant issue that arises with the timing of this requirement. For many projects, including ours, the connecting Transmission System Operators (TSOs) may not have sufficient time and resources to conduct such studies before the inclusion of the project in the Network Development Plans (NDPs). This is relevant so far as the connecting TSOs are not capable (because the related costs would not be allowed under the national tariff regimes) to conduct such study before the inclusion in the NDP.

This situation effectively creates a chicken-egg dilemma for non-TSOs, making it extremely challenging to move forward with projects and effectively participate in the TYNDP process. As a result, this requirement seems to hinder non-TSO entry routes into the TYNDP and poses potential discrimination against such entities.

Therefore, we strongly urge for reconsideration of the NTC technical study requirement (referring to the supporting technical document of criteria o. Initial estimation of the Transfer capacity increase) in its current form. To alleviate the aforementioned issues, we propose three alternative solutions (some of which need to be combined to address all issues outlined above):

1. Keep Connection TSO Involvement Optional: It would be highly beneficial to make the involvement of the connection TSO in the NTC technical study optional rather than mandatory. The text of the guidance document already points into this direction, however a clarification of the wording would be required to create certainty for all involved parties. This approach would provide more flexibility for non-TSOs and avoid unnecessary delays that could adversely impact project development.
2. Remove CBA Guideline reference of technical study: A full technical analysis as hinted at in the draft Guidance for Applicants is factually impossible to be provided by independent third-party developers which submit the project for the first time. For that, it should be clarified that a robust estimation of the NTC increase can be provided by a promoter using any methodology.
3. Remove the Requirement altogether: Alternatively, removing the NTC technical study requirement for projects that participate in the TYNDP process for the first time altogether could be a viable solution. This step would simplify the process and allow these projects to progress based on their own merits, streamlining the TYNDP process and encouraging more non-TSO participation.

We emphasize that the timely and non-discriminatory assessment of projects is of utmost importance. Allowing non-TSOs the opportunity to participate in the TYNDP process independently will foster innovation, attract much needed private capital for investment into cross-border interconnection projects and promote fair competition, resulting in the identification of the most valuable projects for Europe's energy infrastructure.

In conclusion, we urge ENTSO-E to carefully consider the implications of the NTC technical study requirement and its potential impact on non-TSOs. We believe that by keeping the connecting TSOs involvement optional or removing the requirement entirely, the TYNDP 2024 cycle can become more inclusive and efficient.

Thank you for considering our feedback and for your commitment to enhancing the TYNDP



process. We look forward to continued collaboration in improving Europe's energy infrastructure.

**A: NTC and dNTC values were requested to be provided also in previous editions of TYNDP. In this cycle project promoters are requested to submit a supporting documentation explaining how they compute such NTC and dNTC values. The involvement of the TSO is not mandatory and is not mentioned in the Guidance.**

**The supporting documentation is needed to understand how the NTC was calculated, did the project promoter consider only the thermal capacity of the line or did you perform a study. Was the TSO involved in the study. What grid model did you use, what is the year and the scenario used in the computation. Is the study publicly available in English. For projects fulfilling administrative criteria between e and i; an NTC study, in many cases made by a/several TSO is already available either if it is a 3rd party project; and in that case possibly assessed by an NRA.**

**For projects under criteria j (TSO agreement) or k (under study), it is understandable that is more difficult as the project is still in a preliminary stage. The intention here is that the project promoter provides the study supporting the value of dNTC considered (dNTC value was also asked in previous guidelines) for ENTSOE knowledge**

**Organization: Xlinks Germany GmbH**

Q: As a new developer applying to TYNDP for the first time, we would have appreciated a longer time between publication of the final draft and the TYNDP application period to make sure we can act on required items.

**A: ENTSO-E expects only minor edits between the final Guidance and the version submitted for public consultation in the summer of 2023. In any case, the Guidance for promoters is edited between each TYNDP cycle always starting and improving from the version of the previous process. This is so that the process allows promoters to prepare early for the next TYNDP process based on the Guidance of the previous TYNDP cycle, knowing that requirements for inclusion in the TYNDP evolve usually very little from one edition to the next.**

Q: We don't understand why the scope of "radial" transmission has been limited to "offshore radial" ("The notion of transmission projects includes offshore radial and hybrid projects"). We think there should be an option for "onshore radial" to be included as well.

**A: It is possible to apply for radial onshore projects as it is also possible to apply for onshore hybrid projects (6.2.2 section of 4<sup>th</sup> Cost Benefits Analysis Guideline), but these projects should have a minimum impact in a cross-border between two Member States of 500 MW. The offshore radial are specifically addressed as they are in the TEN-E guidelines.**

Q: We think the addition of the new NTC requirement is unclear. We lack detailed requirements to be able to provide a satisfactory answer (this could be a one-pager or a 100-pager document). Hence, we are concerned that given the short timeline between final draft and application opening we could struggle to comply with potential detailed requirements that may be added in the final draft. Given the short timeline, we would like either for the requirements to be light (e.g., non-dynamic high-level modelling of flows), or the NTC criteria to be deleted for the TYNDP 2024.

We have the same remark on the "cost of generation" item, for which we are lacking detail to assess how to comply. We can provide estimated capex for the generation part, as well as opex, but if something else is required we once again are concerned that we would not have time to do the required analyses to comply.

**A: NTC and dNTC values were requested to be provided also in previous editions of TYNDP. In this cycle project promoters are requested to submit a supporting documentation explaining how they obtain or compute such NTC and dNTC values. The supporting documentation is needed to understand how the NTC was calculated, if the project promoter considered only the thermal capacity of the line or performed a study. In case of study what were the hypothesis, scenario, grid model, and when and by whom were it was performed and if the affected national TSOs were involved in the study and a copy of the study itself, preferably in English. . . T For projects fulfilling administrative criteria between e and i; an NTC study, in many cases made by a/several TSO is already available either if it is a 3rd party project; and in that case possibly assessed by an NRA.**

**For projects under criteria j (TSO agreement) or k (under study), it is understandable that is more difficult as the project is still in a preliminary stage. The intention here is that the project promoter provides the study supporting the value of dNTC considered (dNTC value was also asked in previous guidelines) for ENTISOE knowledge.**

Q: In the CBA and data part, the guidance mentions “In the event where new information that causes the project to be ineligible to TYNDP becomes available, ENTSO-E reserves the right to exclude the project from TYNDP”. We don’t understand this part as it seems to disrespect the principle of appeal that otherwise always applies for TYNDP refusal. We ask for an appeal option to be available, and a neutral panel to decide if it happens.

**A: The possibility to appeal is always available, whenever a rejection decision is issued by ENTSO-E. This is true whether the rejection is issued as an outcome of the projects verification process, or later in the life of the project. To provide some more context on why we foresee the possibility that a project becomes ineligible after having been initially accepted in the TYNDP: this could happen in the case where a promoter provides false information during the submission window, and that ENTSO-E would become aware of the false information late in the process.**

**Organization: JSC EMS**

*Q: Comment no. 1: Figure 1 is not aligned with the time frame given below. Namely, the submission window is moved by 15 days. Please, adapt the figure to the timeline mentioned in the document.*

**A: It will be corrected. Mentioned also in other comments**

Q: Comment no. 2: Regarding the criterion "e (PCI/PMI)", can you, please, clarify if the sentence "In case of application for inclusion in the next PCI/PMI list, the promoter shall specify it in the submission platform" refers to the situations in which the PCI/PMI process is underway, but not completed by the end of project submission window, so the promoters do not know if the project will be added to the list?

**A: In the final Guidance for promoter it has been more clear. PCI/PMI number as in the latest official 1st Union PCI-PMI 2023 list published by the European Commission. In case of application for inclusion in the 1st Union PCI-PMI 2023 list, the promoter shall specify it in the submission platform. ENTSO-E will take into consideration its application and this criterion will be rechecked when the 1st Union PCI-PMI 2023 list is published by the European Commission.**

Q: Comment no. 3: In the part of the guidelines related to the criterion "f (National plan)", it says that, if the original NDP is not in the English language, the promoter must provide translations of the relevant part(s) mentioning the project. Will those translations be requested as the separate documents or will the relevant translated parts be pasted directly into the project submission platform?

**A: It would be ideal if you could provide the translations directly in the submission platform, so that all documents are at the same place. In the case it is not possible to upload the translations by the end of the submission window please inform ENTSOE as soon as possible and we can foresee to communicate them via email.**

Q: Comment no. 4: On the page 21, it says that "ENTSO-E may contact promoters and ask for confirmation or clarifications on the information provided, or for additional information or documentation, within a set deadline". Will the deadline be specified at the time of request or is there already a dedicated time slot for these activities? From our side, it would be better to specify the duration of the time slot even here, maybe add "... the deadline will be two weeks (if that is the duration of the reaction period) after sending the request to the promoter" or something like that.

**A: The deadline will be specified in the email requests to the promoter. In past cycles the standard deadline was by 5 working days.**

Q: Comment no. 5: On page 4 (the introductory chapter), the sentence "ENTSO-E will ask Project Promoters for justification in case projects previously part of TYNDP 2022 are not submitted to TYNDP 2024" seems to be missing some words in the last part. Please, rephrase it to make it more understandable.

**A: There is no consequence. It is simply a requirement from ACER, because NRAs and ACER want to be informed of the reason why a promoter decides to no longer submit a project to TYNDP**

Q: Comment no. 6: On the page 25, it says that the NT+ 2030 scenario is aligned with the anticipated NECPs. Even though this is correct, maybe an addition should be inserted that this

scenario is aligned with NECP in countries in which that document exists and with the data provided by the TSOs in countries in which NECP has yet to be made.

**A: Every Member State should have an NECP according to the EU regulation. In case of not having an NECP or the current one is clearly outdated and not an official update the responsible TSO should provide the data to ENTSOE .**

Q: Comment no. 7: On the page 25, it says that, for the NT+ 2040 scenario, both the "full CBA" and "market only CBA" will be done. Since one excludes the other, please, look into this.

**A: The header of the column in the table explains how to read the bold text. Market only CBA is the minimum product, if a full CBA cannot be achieved.**

## Organization: Edison SpA

Q: With regards to the additional administrative criteria for project promoters of storage projects (category C, letters e. to j.) detailed at page 16 and 17 of the “Guidance for project promoters” document, Edison would like to underline some critical aspects, especially in relation to the criteria applicable to projects under ‘more advanced status’ (planned but not yet in permitting, in permitting and under construction).

Analyzing the six criteria (of which at least one must be fulfilled) within the specific Italian context, there seems to be an underlying bias against more advanced projects, especially in countries where the NDP does not include storage projects.

In fact, for new storage projects that are already in the permitting phase, and for the first time apply for the inclusion in the TYNDP (that are not included in the 5th PCI list nor applied for inclusion in the 6th PCI list), only 2 criteria could potentially apply:

- National Plan (more advanced)
- TSO agreement or processes (more advanced)

However, in the specific Italian context, the National Development Plan does not include specific storage projects, but only a generic reference to the total storage capacity estimated to be needed in the future. Thus, as it is specified in the document, this criterion cannot apply.

Therefore, in Italy, the only applicable criterion for new storage projects that are already in the ‘more advanced’ phase (that are not included in the 5th PCI list nor applied for inclusion in the 6th PCI list), is the TSO agreement criterion.

Nonetheless, with respect to the ‘TSO agreement’ criterion, for which the required documentation is “The signed connection agreement with the impacted TSO”, there seems to be a lack of accurate definitions.

In fact, it is important to point out that, within the Italian regulatory framework, the connection to the transmission system follows these steps:

1. Connection request: the TSO elaborates the STMG (General minimal technical solution) and the connection estimate. The applicant, within a specified timeframe, needs to accept the quote.
2. The applicant elaborates the connection project (if requested) and asks for the “approval release” by the TSO. After the “approval release” has been granted, the applicant has to start the authorization process.
3. The applicant informs the TSO on the completion of the authorization process and requests the POD (Point of Delivery) code.
4. The applicant requests the STMD (Detailed minimal technical solution) to the TSO and accepts it.
5. The connection contract is signed, and construction can start.

Thus, in Italy, the connection contract with the TSO is signed only at the end of the permitting phase (phase 5), immediately before the starting of the construction works.

If the documentation requested to fulfill the TSO agreement criterion (The signed connection agreement with the impacted TSO) would only refer to phase 5 of the aforementioned list, then ‘more advanced’ storage projects that are still in the permitting phase (not concluded) would be automatically excluded from the TYNDP, since none of the mentioned criteria can be fulfilled. If this is the case, Edison worries that the current version of the Guidelines could trump the admission in the TYNDP of more advanced projects located in some countries, such as Italy, while favoring, paradoxically, projects located in the same country that are still ‘under consideration’, since they would have at their disposal more criteria to fulfill (criteria h. Member States/NRA agreement, and j. Studies).

Thus, Edison believes that for the ‘TSO agreement’ criterion a wider definition of “connection

agreement” should be provided, encompassing also the first phases of the connection process (e.g. the acceptance by the project promoter of the TSOs connection estimate).

In addition, the starting of the permitting procedure could also be added among the criteria used for more advanced projects, since it reflects the willingness and the ability of the project promoter to follow complex and costly (especially for pumped hydro projects) authorization procedures.

**A: ENTSO- E as an exception analyses national rules or laws related to permitting process of projects and ensure equal treatment with the other countries.**

Q: With respect to the technical criteria for storage projects, Edison wishes to request a clarification for the criterion k. Capacity and Generation, at page 18-19 of the document (paragraph 2.3.2 “Technical Criteria for Storage Projects”).

In particular, Edison requests a clarification about the sentence “minimum values different from zero” present in the Required information section (point i. and ii.). What is the exact meaning of the sentence, and what are the ‘minimum values’ specifically referring to?

**A: The minimum values different from zero refers to hydro storages, but can be extended to any kind of storage, that has a minimum technical value below which it cannot operate (e.g. instability of the machine). Therefore, if your project has this technical constraint you will have to fill in the field with the non-zero value linked to this minimum stable level.**