

T&D Europe contribution to open consultation on the ENTSO-E Ten Years Network Development Plan (TYNDP)

Introduction

T&D Europe (www.tdeurope.eu) is the European Association of the Electricity Transmission & Distribution Equipment and Services Industry, which members are the European National Associations representing the interests of the electricity transmission and distribution equipments manufacturing and derived solutions. The companies represented by T&D Europe account for a production worth over € 25 billion EUR, and employ over 200,000 people in Europe.

T&D Europe highly acknowledges the efforts of ENTSO-E contributing to the development of the future transmission grids in Europe. The TYNDP is a significant approach in terms of suggesting grid re-enforcement and extension aiming for more efficient power supply in Europe.

T&D Europe has carefully analysed ENTSO-E's Ten Years Network Development Plan (TYNDP) which was published for public consultation in March 2010, and would like to offer its following comments and remarks.

Comments to the Plan

Comments during Stakeholder Workshop on March 19th, that T&D Europe feels should be highlighted:

On the 19th of March 2010 a stakeholder workshop was held in Brussels by ENTSO-E to present the TYNDP and to collect stakeholder's comments. The following comments have been stated by presentation and during discussions.

Main observations:

- The “bottom-up” approach is not giving an optimal solution:
 - bottom-up planning approach gives a result based on the aggregation of regional trends developed by regional groups within ENTSO-E
 - additionally a “top-down” planning approach is necessary, which defines a European-wide plan based on European targets → alignment of national and European ten-year development plans
 - today top-down approach is not possible, as only few national ten-year plans are existing; national TYNDP are necessary for a combined approach
 - projects are a combination of European planning results and regional planning results → a coherence between national and European plans is not given

- complete network and market model has to be developed to ensure consistent planning results
- only standard technology solutions are considered to strengthen/extend the network, no other options (e.g. storage) to minimize of investment costs

Further comments:

- ENTSO-E plan is not binding as per EU regulation
- national regulators have to agree with proposed projects
- licensing process should be accelerated/simplified at least for urgent projects
- it is necessary to push the project today → urgency of realizing projects
- prioritization of projects is missing
- no monitoring of progress of project implementation
- financing of projects is not secured - possible solutions:
 - regulator support for urgent projects
 - EC support for new technologies
 - support by TEN-E program for Pan-European projects

Comments by T&D Europe to the TYNDP

- the plan does not consider a vision or consistent strategy for the future European network (e.g. a plan for 2050)
- proposed projects are mostly addressing rather local issues (e.g. increasing cross-border capacities)
- all land connections are realized as standard 400kV AC overhead lines,
- transmission voltages > 400kV are not considered
- all cable projects are submarine connections (AC or DC)
- Only very few new technologies are considered, e.g.
 - HVDC / VSC (Voltage source converter technology)
 - FACTS (SVC, TCSC)
 - PST (phase shifting transformer)
- Important new technologies are not mentioned/considered, e.g.
 - GIL (Gas Insulated Lines)
 - large storage plants connected to HV network
- only a short chapter with rough overview over new technologies is presented,
- super grid and DC grid issues are underrepresented,

- A convincing vision for the future EU-transmission grid is not included in the plan.

Conclusion:

- T&D Europe, representing the European Transmission and Distribution Equipment Manufacturers, is ready to support ENTSO-E by providing innovative ideas and technology solutions that may promote the efficient development of the transmission grid.
- T&D Europe is recommending a clear roadmap and timelines for Europe to be developed under the guidance of the EU commission to develop the transmission-grid of the future.
- Furthermore, allocation of power plants / bulk renewable generation plants as well as the role of decentralized generation sites should be defined much clearer to ensure planning and successful project development.
- A jointly developed master plan could be the framework that will integrate all grid participants including grid operators, generation companies, trading companies, system and product manufacturers, regulators and consumers. It will also stimulate investments and prioritize project activities across EU countries.
- Finally, the acceleration of project development and approval needs to be addressed clearly stating the obstacles to be removed. T&D Europe is ready to support the process by own initiatives and communication.