

April 2012

The Renewables-Grid-Initiative (RGI) welcomes the work that ENTSO-E has delivered in drafting the second Ten Year Network Development Plan (TYNDP) in 2012 and the invitation to give feedback on this plan in an open consultation.

In view of future TYNDPs, RGI sees some room for further improvement on the process as well as the content. The following feedback will therefore be structured in two parts: First on the future approach to consultations towards the next TYNDPs (2014 and beyond), second on the content of the TYNDP 2012.

Summary

RGI believes that future ENTSO-E TYNDP could become an important tool in achieving public acceptance of grids. In view of the **consultation process for future TYNDP**, we suggest that

- increased participation of stakeholders representing society already at this stage will help to gain public support for extending the power grid
- a working group with the objective to enhance such participation should be established and results be applied in the TYNDP 2014
- maximum level of transparency (within reasonable limits) should become a guiding principle for future TYNDP and best practices from member states considered
- a "TYNDP transparency & participation officer" could be nominated by ENTSO-E to lead discussions on transparency with external and internal stakeholders; independence of this function should be increased over time

In view of the **draft TYNDP 2012**, we welcome the inclusion of "environmental concerns" and "social acceptance" considerations and criteria. We suggest that

- for both topics it should be clarified further, through dialogue with relevant stakeholders, what exactly should be the scope and the objective of their inclusion in future TYNDPs
- both topics require robust definitions and meaningful, transparent metrics and/or judgment criteria. Combined with some indications where feedback should be given, this would allow external stakeholders to give more relevant feedback on these topics than is currently possible
- in future versions, the definition and use of the indicator "Social and Environmental Impact" in the assessment framework should be described in more detail
- environmental concerns should be considered more strongly in European grid planning. Assessments should be increasingly harmonized between member states and the EU level; best practices from member states should be considered for this and regional and EU-wide strategic spatial planning and assessment should be introduced (in line with Principle 4.1.1. and 4.1.2. of the "European Grid Declaration"); in the medium to long term, a full SEA should be done on the TYNDPs

- in future versions of the chapter on social acceptance, recent insights gained in the research and practical work on social acceptance should be considered, and successful measures of TSOs and other stakeholders could be presented
- in the long term, a monitoring system for the application of best practices in national/regional/local grid planning and grid development (incl. permitting procedures, stakeholder consultations etc.) could be introduced alongside the TYNDPs to create transparency on the application of best practices across Europe

1. The future approach to consultation of TYNDPs (2014 and beyond)

RGI believes that in view of the consultation of future TYNDPs, three key aspects should be considered in more detail:

- a. How can the work on TYNDPs support **public acceptance for a future grid** in Europe, e.g. by creating an alignment on the need for grids amongst technical experts and a broader political and non-political audience?
- b. How can constructive **stakeholder participation**, including from civil society representatives, be supported for future grid planning, such as in TYNDP?
- c. How could more **transparency** be implemented in future TYNDP, in order to achieve better public acceptance?

RGI would be glad to take an active role in discussions regarding these three aspects.

a. Making the TYNDPs support public acceptance for a future grid

In various discussions between NGOs and TSOs within RGI, the challenge of a lack of a broad understanding and alignment on "how much grid do we need?" was raised. In many cases where local opposition is delaying a grid development project, this question on the general need for grid expansion is brought up and makes discussions between project developers and local community and their representatives more difficult. In several cases, technical analyses on how decentralized generation can help to reduce the need for grid expansion have been referred to and increased confusion amongst the population on what is "technically" right. Furthermore, a lack of clarity on which energy policy objectives form the basis for the grid development needs, and how changes in energy policy objectives (e.g. a different generation mix foreseen) would impact the need for the grid, adds to such confusion.

The ENTSO-E TYNDPs could help in the future in overcoming such fundamental debates and helping the discussion "on the ground" to focus on more local concerns - thereby contributing to public acceptance and facilitating permitting procedures. In order to fulfill such a task, more transparency on the assumptions used and the sensitivities considered in TYNDP is needed.

To support public acceptance, future TYNDPs will require the full trust and support of a very broad political and non-political audience, as well as of civil society. This requirement relates to both the analysis done AND the process of developing future TYNDPs. To achieve **broad support and trust in society for the analysis done**, an explicit inclusion of scenarios /sensitivity analysis with a

focus on different levels of penetration of decentralized generation technologies, as well as different levels of demand response and flexibility solutions could be considered. This would strengthen the trust in the analysis especially of those groups in society who are strong proponents of decentralized generation technologies, who are generally in favor of a European grid, but are concerned that grid expansion may focus too much on centralized generation technologies. Conducting such analysis in future TYNDP may require further resources allocated on the European level, but it would help reducing delays in projects on the ground. Such additional analysis could also enrich the results of future TYNDPs by indicating in which areas distributed generation (incl. with a certain generation load profile) and flexibility options (incl. smart grids, storage, demand side response) would be most valuable to improve system stability.

To achieve **broad support and trust in society for the process** of developing and consulting future TYNDPs, the involvement of civil society actors in the consultation should be strengthened. Besides publishing all consultations in the internet, it would be helpful to "activate" key stakeholders by inviting them to participate and to inform them about the impact of their contributions. Experiences within RGI and in scientific literature show that the process applied in grid planning is of crucial importance for public acceptance. Real trust and support for the result of grid planning requires trust in the process. Participation and transparency are crucial to create such trust - we therefore elaborate on these two points below (b. and c.) and make specific suggestions for improvement. Another important aspect to consider in future TYNDPs will be to communicate well the process of stakeholder involvement and the effect this has had on the final result.

b. Enhancing civil society stakeholder involvement in future TYNDPs

A stronger involvement of civil society stakeholders of society in future TYNDPs would improve the implementation of grid projects on the ground across Europe. Firstly (as described above) it would increase trust and support in the TYNDPs and thereby help overcoming "general" debates on the need for grids "on the ground", and allowing the local debates to focus on local issues. Secondly, it can improve the quality of the work by giving access to specialist knowledge on certain issues (e.g. biodiversity, habitats, landscape), including on concerns which would otherwise appear at later stages in the planning and permitting process.

Enhancing civil society stakeholder involvement in future TYNDPs is a very important task, yet also one with little precedence and without an "off the shelf" solution. The TYNDP 2012 is making a good start towards involving civil society actors in the process. At the same time the pioneering character of it brings along several challenges - such as a lack of clarity amongst civil society stakeholders on what exactly they are invited to give feedback on, where exactly their feedback could help, or which part of the 600+ pages of documents would be relevant for them to read in view of limited time and resources available. Improved consultation processes would also enable TSOs to better understand public

concerns and stakeholder positions and to enhance dialogue between both TSOs and stakeholders.

We suggest considering the establishment of a working group with the objective to "enhance civil society engagement in future TYNDPs consultations". Such a group could bring together ENTSO-E and different stakeholders of civil society, including NGOs. If initiated in 2012, first ideas that are developed could be tested in the consultations on the TYNDP 2014. Key tasks to be elaborated in such a working group should include:

- A) what groups should ideally participate in future TYNDPs consultations
(e.g. groups representing (i) nature conservation concerns, (ii) citizens affected by grid expansion, (iii) consumers)?
- B) how and on what issues would their input be most effective
(e.g. nature conservation NGOs could give feedback on the analysis performed on nature concerns, NGOs focusing on climate change give feedback on scenario development, civil action groups give feedback on social acceptance concerns)?
- C) how could this be achieved in a most efficient and effective procedure?
(e.g. consultations could be dedicated in different thematic areas and different contact persons could be nominated for these; detailed guidance could be provided on what input is desired/ most relevant, ideally including a one-year advance planning; feedback procedures to discuss why certain feedback)
- D) what is needed to enable these stakeholders to play a constructive part?
(building on the solutions identified above, the extra effort required to enable engagement of civil society could be assessed for both ENTSO-E and stakeholders; for the latter, options could be e.g. institutional funding or capacity building from EU funds)

Such a working group should coordinate with the efforts that the EU Commission (DG Energy) is currently undertaking with the establishment of the "Electricity Highways Stakeholder Platform" within the ENTSO-E led project "MODPEHS" (development of grid scenarios until 2050), to avoid duplication of work.

Such a working group should furthermore build strongly on experiences that exist with network development plans on an EU member states level. Best practices in involving stakeholder from civil society should be identified and considered (a possible example is the German Bundesnetzagentur that is currently implementing a new approach of consulting the network development plan and puts significant efforts in engaging stakeholders of civil society).

c. Increasing transparency in future TYNDP to achieve better public acceptance

In discussions within RGI, transparency in the planning of electricity networks has often been raised as a key issue to achieve public acceptance. Without a certain insight to the analysis, important stakeholder groups will remain discontent for not being able to deeply understand or reproduce the analysis which determines the need for grids. At the same time, restrictions to transparency in network modeling exist, and will continue to exist, due to security and other concerns.

RGI suggest that future TYNDPs could maximize their contribution to public acceptance if the highest level of transparency that is reasonable is introduced as a guiding principle.

The nomination of a "TYNDP transparency & participation officer" within ENTSO-E could be considered, who would act as a contact person to outside stakeholders. This person would discuss suggestions for more transparency with outside stakeholders as well as with internal stakeholders within ENTSO-E. This person could publish a "transparency & participation progress report" alongside with future TYNDPs. If implemented, a certain level of independence or external monitoring and evaluation of this position should be granted, e.g. by establishing a public feedback mechanism that lets external stakeholders comment on their perception of the progress achieved in regard of transparency.

Increasing transparency and participation in future TYNDPs, would mean in practical terms that as much information as possible is published online. It would also mean that good practices made within EU member states are considered (a possible example could be the German case, where a selected list of trusted experts are allowed access to the grid network model).

Examples of how transparency could be increased in the current draft TYNDP 2012, are (i) more detailed information on how the criteria in the assessment framework (page 125-135 of the TYNDP 2012) are developed, defined and measured; (ii) more detailed information on how key results are derived, such as the attribution of specific projects to different grid development objectives (page 42-50 of TYNDP 2012).

Increasing the level of transparency in most cases leads to higher level of resources required (e.g. for the effort to prepare and publish certain information). Such restrictions must certainly be considered and will in many cases set a limit to the "reasonable" level of transparency. On the other hand, more resources invested in transparency on the European level would encourage more discussions with external stakeholders, contribute to public acceptance and to a reduction of delays in grid developments across Europe.

2. Feedback on the content of the draft TYNDP 2012

The focus of the RGI work in the last two years has been on public acceptance (d.) and the consideration of environmental concerns in grid development (e.). We will therefore focus our feedback on these two issues.

d. Inclusion of social acceptance concerns in the TYNDP 2012

The challenges of social acceptance of grid development are in the current draft TYNDP considered in the "Appendix 4: Social acceptance of projects" and in the indicator "S.1 Social and environmental impact" of the assessment framework. Detailed comments on these are below.

In general, we strongly appreciate that this very important concern is included in the TYNDP and we believe that the challenge of social acceptance should be very high on the agenda of grid development in Europe. Considerable efforts to improve social acceptance of grid development are required in Europe, and RGI has started to work with its TSO and NGO members on identifying and exchanging best practices to improve social acceptance. In view of future TYNDPs, we believe that a clear perspective should be developed, to what extent the challenge of social acceptance and improved permitting procedures will be discussed in the TYNDP and with what objective. It should be made very clear, what type of feedback on what aspect is most welcome, and how and to what extent the feedback of stakeholders will be considered. This would allow external stakeholders to understand better the relevance of their involvement in future consultations of TYNDP on this topic.

For example recent developments on the EU and member state level that are relevant for the topic of social acceptance and improved permitting procedures could be presented within the TYNDP (or in a parallel process). Consultations on this topic could then serve as a valuable tool to acquire additional information, for example changes in permitting legislation in member states, analysis done on the effects of new procedures in member states, best practices applied by national or regional authorities. A presentation of best practice approaches to achieving social acceptance could also be considered in future TYNDP, making the consultation a valuable source to gather most recent experiences made across Europe.

In the "Appendix 4: Social Acceptance of Projects" (page 136-138), the key concerns regarding social acceptance of transmission projects (based on TYNDP 2010) and the measures suggested in the draft energy infrastructure package are summarised. The focus is hereby on the challenges in regard of the permitting of new lines and the streamlining of authorisation procedures. We suggest that in future versions of this appendix, recent insights gained in the research and practical work on social acceptance should be considered. An overview of such recent studies is available on the website <http://renewables-grid.eu/documents/docsstudies.html> under "public acceptance" and will be regularly updated. Future versions could also consider to focus more strongly on two key aspects of social acceptance (i) "how do we get to a broad agreement in society?" and (ii) "how do we get the processes right to achieve

acceptance on the local level?”. Also, successful approaches of TSOs and other actors to achieve social acceptance could be presented.

In the long term, a monitoring system for the application of best practices in the processes applied in grid planning and grid development on national/regional/local could be introduced alongside or within the TYNDPs. Such a monitoring would create transparency and comparability of where in Europe which best practices (e.g. in regard of permitting procedures, consultation of stakeholders and affected population, etc.) are applied. Such a monitoring would encourage mutual learning and improvement of procedures across Europe.

The indicator “S.1. Social and environmental impact” (page 127 and 128) that is used in the assessment framework (the same one as described above) intends to “give a measure of probability that the project will be built at the planned commissioning date”. Amongst the measures used for its calculation is the existence of “former conflicts in the area” and the indication/measurement is “found through an expert assessment, if possible supported by preliminary environmental studies”. While we strongly appreciate the inclusion of such an indicator in the assessment, a more detailed description of how this indicator is measured and quantified would support the provision of feedback to future TYNDPs.

e. Inclusion of environmental concerns in the TYNDP 2012

The environmental aspects of grid development are considered in the chapter 9 “High Environmental Standards” and in the indicator “S.1 Social and environmental impact” of the assessment framework. Detailed comments on these are below.

In general, we believe that a clear perspective should be developed for future TYNDPs on to what degree environmental concerns in grid development should be considered in grid planning at the European level. It should furthermore be made very clear, what type of feedback on what aspect is most welcome and how this feedback can contribute to improve the results. This would allow external stakeholders to better understand the relevance of their involvement in future consultations of TYNDP on the European level.

We suggest that along with a coordinated development of technical planning standards in the member states and European level, the inclusion of environmental concerns in grid planning should as well be further developed in a coordinated way. We recommend to study how the concept of SEA could apply to future community wide TYNDPs taking into account the variety of national applications. This would allow to determine the least damaging plan alternatives, and to gather data and external expert input. This would lead to a major improvement in the effectiveness and efficiency of permitting procedures and build legitimacy and support for subsequent projects ‘on the ground’. Best practices from national level should be taken into consideration.

At a closer look at chapter 9 (page 65), the title appears to be somewhat misleading, as in the current draft version, environmental standards in grid development (i.e. how to apply high standards in

regard of protecting biodiversity and nature conservation concerns etc. in grid development) are not mentioned. The current focus of the chapter 9 is on the positive effect that grid development has on the integration of renewable energies and the reduction of CO2 emissions incurred. While this is indeed a very important benefit of grid development, the discussion of environmental aspects (such as on biodiversity, nature conservation, landscape, etc.) is currently missing. A helpful reference may be RGI's "European Grid Declaration" of November 2011 (<http://renewables-grid.eu/documents/eu-grid-declaration.html>). This declaration has been signed by Europe's largest TSOs and non-governmental organizations and lays out a set of principles on how grids can be built in line with nature conservation objectives while speeding up the planning and permitting process.

The description of the indicator "S.1. Social and environmental impact" (page 127 and 128) reveals that it "characterizes the project impact as perceived by the local population" and at the same time states that "impact on nature (biodiversity...)... are analysed". In the current draft version, no further explanation is given of how environmental impact is measured. In order to allow for constructive feedback from external environmental experts, the explanation of the definition, quantification and application of this indicator should be improved in future versions.

f. Further comments on the TYNDP 2012

RGI believes that in view of very long term decarbonisation objectives in Europe (until 2050) it is important to consider long term horizons as well in the grid planning. Future TYNDPs should aim to include longer term energy scenarios than only a ten-year outlook, and include scenarios with a very high share of renewable energies.

In the TYNDP 2014, the energy scenarios considered should at least include

- a timeframe until 2030 (if possible until 2050)
- a sensitivity analysis on grid development needs for very high shares (~80%) of renewable energies already by 2030
- sensitivity analysis for the case of a strong focus on decentralized renewable energy sources
- sensitivity analysis for the case of a very strong development of smart grids and large-scale and small-scale storage

About RGI

The Renewables-Grid-Initiative brings together non-governmental-organizations and electricity grid operators to support the effective integration of 100% renewable electricity into the grid. RGI was launched in July 2009 by a coalition of Transmission System Operators (TSOs) and Non-Governmental Organizations (NGOs) and has grown to 13 members across Europe today. RGI activities are in support of national and EU authorities' efforts to realise an efficient, sustainable and socially accepted development of the European network infrastructure - for both decentralised and large-scale renewable energies. In November 2011, RGI brought together a coalition of 24 organizations, including 9 of Europe's largest TSOs

and NGOs such as WWF, Greenpeace, Birdlife and Friends of the Earth Scotland in signing the "European Grid Declaration on Electricity Network Development and Nature Conservation (www.renewables-grid.eu/uploads/media/European_Grid_Declaration_signed_02.pdf)

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