

European Grids Package

Fields marked with * are mandatory.

Introduction

About you

* Language of my contribution

- ☐ Bulgarian
- ☐ Croatian
- ☐ Czech
- ☐ Danish
- ☐ Dutch
- ☒ English
- ☐ Estonian
- ☐ Finnish
- ☐ French
- ☐ German
- ☐ Greek
- ☐ Hungarian
- ☐ Irish
- ☐ Italian
- ☐ Latvian
- ☐ Lithuanian
- ☐ Maltese
- ☐ Polish
- ☐ Portuguese
- ☐ Romanian
- ☐ Slovak
- ☐ Slovenian

- ☐ Spanish
- ☐ Swedish

* I am giving my contribution as

- ☐ Academic/research institution
- ☒ Business association
- ☐ Company/business
- ☐ Consumer organisation
- ☐ EU citizen
- ☐ Environmental organisation
- ☐ Non-EU citizen
- ☐ Non-governmental organisation (NGO)
- ☐ Public authority
- ☐ Trade union
- ☐ Other

* First name

Paul

* Surname

Villalobos Valdivia

* Email (this won't be published)

pv@vemw.nl

* Organisation name

255 character(s) maximum

IFIEC Europe

* Organisation size

- ☐ Micro (1 to 9 employees)
- ☒ Small (10 to 49 employees)
- ☐ Medium (50 to 249 employees)
- ☐ Large (250 or more)

Transparency register number

Check if your organisation is on the transparency register. It's a voluntary database for organisations seeking to influence EU decision-making.

1978775156-31

* Country of origin

Please add your country of origin, or that of your organisation.

This list does not represent the official position of the European institutions with regard to the legal status or policy of the entities mentioned. It is a harmonisation of often divergent lists and practices.

- | | | | |
|-------------------------------------------|-----------------------------------------------------------|----------------------------------------|--------------------------------------------------------------------|
| <input type="radio"/> Afghanistan | <input type="radio"/> Djibouti | <input type="radio"/> Libya | <input type="radio"/> Saint Martin |
| <input type="radio"/> Åland Islands | <input type="radio"/> Dominica | <input type="radio"/> Liechtenstein | <input type="radio"/> Saint Pierre and Miquelon |
| <input type="radio"/> Albania | <input type="radio"/> Dominican Republic | <input type="radio"/> Lithuania | <input type="radio"/> Saint Vincent and the Grenadines |
| <input type="radio"/> Algeria | <input type="radio"/> Ecuador | <input type="radio"/> Luxembourg | <input type="radio"/> Samoa |
| <input type="radio"/> American Samoa | <input type="radio"/> Egypt | <input type="radio"/> Macau | <input type="radio"/> San Marino |
| <input type="radio"/> Andorra | <input type="radio"/> El Salvador | <input type="radio"/> Madagascar | <input type="radio"/> São Tomé and Príncipe |
| <input type="radio"/> Angola | <input type="radio"/> Equatorial Guinea | <input type="radio"/> Malawi | <input type="radio"/> Saudi Arabia |
| <input type="radio"/> Anguilla | <input type="radio"/> Eritrea | <input type="radio"/> Malaysia | <input type="radio"/> Senegal |
| <input type="radio"/> Antarctica | <input type="radio"/> Estonia | <input type="radio"/> Maldives | <input type="radio"/> Serbia |
| <input type="radio"/> Antigua and Barbuda | <input type="radio"/> Eswatini | <input type="radio"/> Mali | <input type="radio"/> Seychelles |
| <input type="radio"/> Argentina | <input type="radio"/> Ethiopia | <input type="radio"/> Malta | <input type="radio"/> Sierra Leone |
| <input type="radio"/> Armenia | <input type="radio"/> Falkland Islands | <input type="radio"/> Marshall Islands | <input type="radio"/> Singapore |
| <input type="radio"/> Aruba | <input type="radio"/> Faroe Islands | <input type="radio"/> Martinique | <input type="radio"/> Sint Maarten |
| <input type="radio"/> Australia | <input type="radio"/> Fiji | <input type="radio"/> Mauritania | <input type="radio"/> Slovakia |
| <input type="radio"/> Austria | <input type="radio"/> Finland | <input type="radio"/> Mauritius | <input type="radio"/> Slovenia |
| <input type="radio"/> Azerbaijan | <input type="radio"/> France | <input type="radio"/> Mayotte | <input type="radio"/> Solomon Islands |
| <input type="radio"/> Bahamas | <input type="radio"/> French Guiana | <input type="radio"/> Mexico | <input type="radio"/> Somalia |
| <input type="radio"/> Bahrain | <input type="radio"/> French Polynesia | <input type="radio"/> Micronesia | <input type="radio"/> South Africa |
| <input type="radio"/> Bangladesh | <input type="radio"/> French Southern and Antarctic Lands | <input type="radio"/> Moldova | <input type="radio"/> South Georgia and the South Sandwich Islands |

- | | | | |
|--------------------------------------------------------|---------------------------------------------------------|------------------------------------------------|------------------------------------------------|
| <input type="radio"/> Barbados | <input type="radio"/> Gabon | <input type="radio"/> Monaco | <input type="radio"/> South Korea |
| <input type="radio"/> Belarus | <input type="radio"/> Georgia | <input type="radio"/> Mongolia | <input type="radio"/> South Sudan |
| <input type="radio"/> Belgium | <input type="radio"/> Germany | <input type="radio"/> Montenegro | <input type="radio"/> Spain |
| <input type="radio"/> Belize | <input type="radio"/> Ghana | <input type="radio"/> Montserrat | <input type="radio"/> Sri Lanka |
| <input type="radio"/> Benin | <input type="radio"/> Gibraltar | <input type="radio"/> Morocco | <input type="radio"/> Sudan |
| <input type="radio"/> Bermuda | <input type="radio"/> Greece | <input type="radio"/> Mozambique | <input type="radio"/> Suriname |
| <input type="radio"/> Bhutan | <input type="radio"/> Greenland | <input type="radio"/> Myanmar/Burma | <input type="radio"/> Svalbard and Jan Mayen |
| <input type="radio"/> Bolivia | <input type="radio"/> Grenada | <input type="radio"/> Namibia | <input type="radio"/> Sweden |
| <input type="radio"/> Bonaire Saint Eustatius and Saba | <input type="radio"/> Guadeloupe | <input type="radio"/> Nauru | <input type="radio"/> Switzerland |
| <input type="radio"/> Bosnia and Herzegovina | <input type="radio"/> Guam | <input type="radio"/> Nepal | <input type="radio"/> Syria |
| <input type="radio"/> Botswana | <input type="radio"/> Guatemala | <input checked="" type="radio"/> Netherlands | <input type="radio"/> Taiwan |
| <input type="radio"/> Bouvet Island | <input type="radio"/> Guernsey | <input type="radio"/> New Caledonia | <input type="radio"/> Tajikistan |
| <input type="radio"/> Brazil | <input type="radio"/> Guinea | <input type="radio"/> New Zealand | <input type="radio"/> Tanzania |
| <input type="radio"/> British Indian Ocean Territory | <input type="radio"/> Guinea-Bissau | <input type="radio"/> Nicaragua | <input type="radio"/> Thailand |
| <input type="radio"/> British Virgin Islands | <input type="radio"/> Guyana | <input type="radio"/> Niger | <input type="radio"/> The Gambia |
| <input type="radio"/> Brunei | <input type="radio"/> Haiti | <input type="radio"/> Nigeria | <input type="radio"/> Timor-Leste |
| <input type="radio"/> Bulgaria | <input type="radio"/> Heard Island and McDonald Islands | <input type="radio"/> Niue | <input type="radio"/> Togo |
| <input type="radio"/> Burkina Faso | <input type="radio"/> Honduras | <input type="radio"/> Norfolk Island | <input type="radio"/> Tokelau |
| <input type="radio"/> Burundi | <input type="radio"/> Hong Kong | <input type="radio"/> Northern Mariana Islands | <input type="radio"/> Tonga |
| <input type="radio"/> Cambodia | <input type="radio"/> Hungary | <input type="radio"/> North Korea | <input type="radio"/> Trinidad and Tobago |
| <input type="radio"/> Cameroon | <input type="radio"/> Iceland | <input type="radio"/> North Macedonia | <input type="radio"/> Tunisia |
| <input type="radio"/> Canada | <input type="radio"/> India | <input type="radio"/> Norway | <input type="radio"/> Türkiye |
| <input type="radio"/> Cape Verde | <input type="radio"/> Indonesia | <input type="radio"/> Oman | <input type="radio"/> Turkmenistan |
| <input type="radio"/> Cayman Islands | <input type="radio"/> Iran | <input type="radio"/> Pakistan | <input type="radio"/> Turks and Caicos Islands |

- | | | | |
|--------------------------------------------------------|-----------------------------------|-------------------------------------------------------------------------|------------------------------------------------------------|
| <input type="radio"/> Central African Republic | <input type="radio"/> Iraq | <input type="radio"/> Palau | <input type="radio"/> Tuvalu |
| <input type="radio"/> Chad | <input type="radio"/> Ireland | <input type="radio"/> Palestine | <input type="radio"/> Uganda |
| <input type="radio"/> Chile | <input type="radio"/> Isle of Man | <input type="radio"/> Panama | <input type="radio"/> Ukraine |
| <input type="radio"/> China | <input type="radio"/> Israel | <input type="radio"/> Papua New Guinea | <input type="radio"/> United Arab Emirates |
| <input type="radio"/> Christmas Island | <input type="radio"/> Italy | <input type="radio"/> Paraguay | <input type="radio"/> United Kingdom |
| <input type="radio"/> Clipperton | <input type="radio"/> Jamaica | <input type="radio"/> Peru | <input type="radio"/> United States |
| <input type="radio"/> Cocos (Keeling) Islands | <input type="radio"/> Japan | <input type="radio"/> Philippines | <input type="radio"/> United States Minor Outlying Islands |
| <input type="radio"/> Colombia | <input type="radio"/> Jersey | <input type="radio"/> Pitcairn Islands | <input type="radio"/> Uruguay |
| <input type="radio"/> Comoros | <input type="radio"/> Jordan | <input type="radio"/> Poland | <input type="radio"/> US Virgin Islands |
| <input type="radio"/> Congo | <input type="radio"/> Kazakhstan | <input type="radio"/> Portugal | <input type="radio"/> Uzbekistan |
| <input type="radio"/> Cook Islands | <input type="radio"/> Kenya | <input type="radio"/> Puerto Rico | <input type="radio"/> Vanuatu |
| <input type="radio"/> Costa Rica | <input type="radio"/> Kiribati | <input type="radio"/> Qatar | <input type="radio"/> Vatican City |
| <input type="radio"/> Côte d'Ivoire | <input type="radio"/> Kosovo | <input type="radio"/> Réunion | <input type="radio"/> Venezuela |
| <input type="radio"/> Croatia | <input type="radio"/> Kuwait | <input type="radio"/> Romania | <input type="radio"/> Vietnam |
| <input type="radio"/> Cuba | <input type="radio"/> Kyrgyzstan | <input type="radio"/> Russia | <input type="radio"/> Wallis and Futuna |
| <input type="radio"/> Curaçao | <input type="radio"/> Laos | <input type="radio"/> Rwanda | <input type="radio"/> Western Sahara |
| <input type="radio"/> Cyprus | <input type="radio"/> Latvia | <input type="radio"/> Saint Barthélemy | <input type="radio"/> Yemen |
| <input type="radio"/> Czechia | <input type="radio"/> Lebanon | <input type="radio"/> Saint Helena
Ascension and
Tristan da Cunha | <input type="radio"/> Zambia |
| <input type="radio"/> Democratic Republic of the Congo | <input type="radio"/> Lesotho | <input type="radio"/> Saint Kitts and Nevis | <input type="radio"/> Zimbabwe |
| <input type="radio"/> Denmark | <input type="radio"/> Liberia | <input type="radio"/> Saint Lucia | |

The Commission will publish all contributions to this public consultation. You can choose whether you would prefer to have your details published or to remain anonymous when your contribution is published. **For the purpose of transparency, the type of respondent (for example, 'business association', 'consumer association', 'EU citizen') country of origin, organisation name and size, and its transparency register number, are always published. Your e-mail address will never be published.** Opt in to select the privacy option that best suits you. Privacy options default based on the type of respondent selected

* Contribution publication privacy settings

The Commission will publish the responses to this public consultation. You can choose whether you would like your details to be made public or to remain anonymous.

☐ Anonymous

Only organisation details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and your contribution will be published as received. Your name will not be published. Please do not include any personal data in the contribution itself if you want to remain anonymous.

☒ Public

Organisation details and respondent details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and your contribution will be published. Your name will also be published.

☒ I agree with the [personal data protection provisions](#)

General questions

Secure supplies of clean and affordable energy are critical for European competitiveness, preparedness, security and the EU's decarbonisation efforts towards 2030 and 2050. Ensuring a well-integrated and optimised European energy grid is crucial to accelerating a cost-efficient clean energy transition. The mission letter to Commissioner Jørgensen calls to work for the production of "more clean energy" and "the upgrade of the grid infrastructure". Specifically, it is requested to "look at the legal framework on European grids with the aim to help upgrade and expand grids to support rapid electrification [and] speed up permitting" and highlights the need to "upgrade our grid infrastructure and develop a resilient, interconnected and secure energy system".

Q1: To what extent do you agree that existing EU legal framework for grids delivers on the following objectives?

	Strongly disagree	Slightly disagree	neutral	Slightly agree	Agree	Don't know
* Market integration	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Interconnections	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Competition / Affordability of energy prices	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Energy security	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please explain your reply providing, where possible, qualitative and quantitative evidence.

Natural gas:

Recent investments in floating LNG terminals demonstrate that infrastructure developments in one Member State can directly enhance energy security in neighbouring countries. This underlines the importance and effectiveness of well-functioning cross-border gas flows within the internal market. Cross-border gas infrastructure, including recent bidirectional capacity upgrades, has proven to increase resilience and continues to contribute to energy security.

Electricity:

The current system faces challenges related to loop flows. Loop flows can cause congestion in neighbouring countries due to internal grid bottlenecks elsewhere. Moreover, a lack of coordination in national energy policy decisions can have unintended cross-border impacts. The absence of practical bidding zones based on actual grid constraints further exacerbates these issues. Mechanisms to address these challenges remain insufficient.

Need for industrial involvement

Across all modalities, the role of energy-intensive industries as both users and contributors to the energy system must be structurally embedded in the legal framework. Reference to the letter. A legally binding basis for industrial participation in infrastructure planning, investment decisions, and network access conditions is essential to ensure that grid development reflects real demand, supports decarbonisation, and maintains industrial competitiveness. Please refer to our position paper.

Q2: In your view, what are the main barriers to grid infrastructure development necessary for the energy transition to happen, and at sufficient pace? [rank them from 1 (most important) to 8 (least important)]:

	1 (most important)	2	3	4	5	6	7	8 (least important)	Don't know
* Suboptimal transmission network planning	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Suboptimal distribution network planning	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Lengthy permitting	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Insufficient financing	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Insufficient supply chains	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Inefficient use of existing infrastructure	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Regulatory uncertainty	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other (please specify below)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

Please explain your reply providing, where possible, qualitative and quantitative evidence.

EU Infrastructure planning

Requirements for planning of transmission network development on a national and European level are included in the internal market legislation (for electricity as well as hydrogen and decarbonised gases) and the TEN- E Regulation. They require the TSOs to put forward network development plans with at least a 10-year outlook for grid development biannually. At the European level, this is done through the Ten-year network development plan (TYNDP), currently developed by ENTSO-E and ENTSO-G.

* The following questions Q3 to Q6 apply to both electricity and hydrogen, please specify the sector you are referring to when answering these questions:

- ☐ Electricity
- ☐ Hydrogen
- ☒ Both

Q3: To what extent do you agree with the following statements?

	Strongly disagree	Slightly disagree	Neutral	Slightly agree	Strongly agree	Don't know
* The current framework in relation to the TYNDP and national transmission development plans provides for integrated and coherent planning at national and EU level	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* The TYNDP identifies all cross-border infrastructure needs	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* The TYNDP identifies all relevant projects to match the actual infrastructure gaps	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* The TYNDP should have a more top-down European approach to identify cross-border infrastructure needs, meaning going beyond a project bottom-up approach and ensuring that the planning aligns with EU and Member States' climate and energy objectives	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

* The TYNDP should have a more top-down European approach to better link identified needs and priority projects of European interest	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Projects at national level should align and support priorities of European interest	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please explain your reply providing, where possible, qualitative and quantitative evidence.

Please refer to our position paper outlining the need to establish a formal role for energy-intensive industry in infrastructure planning and development. Insight into the grid at the national and European level is essential, as is greater transparency regarding grid topology. The interests of energy-intensive industry should be structurally considered in grid governance frameworks.

* Q4: The needs identification at EU level should (you can choose more than one option):

- ☒ Cover cross-border projects within the EU
- ☒ Cover internal reinforcements in Member States necessary for cross-border projects
- ☒ Cover connections with third countries
- ☐ Cover non-infrastructure solutions (e.g. grid enhancing technologies)
- ☐ Follow a cross-sectoral approach
- ☐ Other

* Q5: Do you agree with the following statement?

The frequency of the identification of system needs process (every 2-years) is fit for purpose.

- ☒ Yes
- ☐ No

* Q6: Do you agree with the following statement?

The frequency of the scenarios building process (every 2-years) is fit for purpose.

- ☒ Yes
- ☐ No

Please explain your reply providing, where possible, qualitative and quantitative evidence.

-

* Q7: Do you agree with the following statement?

The governance framework of the TYNDP, i.e. the role of all individual involved, should be revised.

- ☒ Yes
☐ No

* If yes, please explain:

The current TYNDP process does not provide a sufficient role for energy-intensive industry. It is essential to ensure stronger and more structured involvement of EII, not only at the European level but also within national network development plans. For further details, please consult our position paper.

Q8: In your view, how can the needs for CO₂ cross-border infrastructure in the EU be reflected in the PCI/PMI selection process under the TEN-E Regulation? Are there other ways the TEN-E Regulation could support the development of future CO₂ cross-border infrastructure? Please explain

CO₂ storage facilities should be eligible for PCI status if they serve clients located in multiple Member States. This would better reflect the cross-border nature and strategic relevance of CO₂ infrastructure.

Please explain your reply providing, where possible, qualitative and quantitative evidence.

-

Electricity network planning at national level

At a national level, transmission and distribution grid operators are obliged to establish respective network development plans ("NDP") at least on a biannual basis, pursuant to requirements of Articles 51 and 32 of the Directive (EU) 2019/944. Plans should set out planned investment, taking into account future development of supply and demand, including renewables generation, flexibility and electric vehicles (EVs) recharging points.

Q9: Concerning the national transmission and distribution network development plans, do you agree with the following statements?

	Yes	No
* The existing legal framework for transmission network development plans is fit for purpose	<input type="radio"/>	<input checked="" type="radio"/>
* There is a sufficient alignment between national transmission development plans between Member States	<input checked="" type="radio"/>	<input type="radio"/>

* There is a need for better alignment between national transmission and distribution network development plans across the EU



* If yes, please choose among the following elements those that can be improved:

- ☐ Common scenarios
- ☐ Alignment of frequency of the planning
- ☐ Alignment of planning scope and outlook period
- ☐ Common minimum features for transmission and distribution network development plans
- ☒ Other

* If other, please specify:

Cost sharing, planning and network development plan, investment priorities. Insufficient involvement of EII.

Q10: Concerning the distribution network development plans, to what extent do you agree with the following statements?

	Strongly disagree	Slightly disagree	Neutral	Slightly agree	Strongly agree	Don't know
* The existing legal framework for distribution network development plans is fit for purpose	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* The coverage of small distribution system operators (DSOs) in the network planning is sufficient under the existing legal framework	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* There is sufficient transparency of distribution network development plans	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* The implementation of the distribution network development plans is sufficient and their objectives met	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Distribution grid operators are equipped with sufficient capacity to properly plan distribution grids	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* There should be a stronger coordination of distribution network planning at EU level	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Other:

The current legal framework lacks provisions to ensure an effective and meaningful consultation process with system users. Additionally, many DSOs face significant operational challenges, including a shortage of skilled personnel, which limits their capacity to implement network development plans in a timely and adequate manner.

Transparency on electricity grid hosting capacity

Article 31(3) of Directive 2019/944 (EU) requires that distribution grid operators provide system users with the information they need for efficient access to, and use of, the system, in particular on capacity available for new connections in their area of operation, information on connection requests as well as on how the available grid hosting capacity is calculated. The EU Action Plan for Grids further strives to enhance transparency by creating a common understanding on the grid hosting capacity calculation across Europe.

* Q11: Do you consider additional measures necessary to reduce grid connection lead times?

Should there be differentiated approaches for different types of uses (industry decarbonisation, residential heat, charging infrastructure)?

- ☐ Yes
- ☒ No
- ☐ Don't know

Permitting

Directive (EU) 2023/2413 (Renewable Energy Directive – RED III), Directive (EU) 2024/1788 (Directive on Gas and Hydrogen Markets), Regulation (EU) 2022/869 (TEN-E Regulation), and Regulation (EU) 2024/1735 (Net-Zero Industry Act) establish provisions for the acceleration of permitting procedures for renewable energy generation, storage and energy networks including CO2 assets. Whilst some RED III provisions have yet to be transposed by Member States due to upcoming deadlines, permitting procedures are perceived as one of the main cause of delays in project implementation.

Q12: In order to accelerate permitting for energy networks, storage and renewables and CO2 assets, to what extent do you agree with the following statements?

	Strongly disagree	Slightly disagree	Neutral	Slightly agree	Strongly agree	Don't know
* The permitting provisions of the TEN-E regulation are clear and easy to implement	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Permitting procedures should be fully digitalised	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

* Availability and sharing environmental and geological data (and other technical data required) should be ensured						
* One-stop shops for network permitting should be introduced						
* Environmental assessments should be simplified and streamlined*						
* Legal deadlines for permitting procedures need to be shortened						
* Deadlines for the permitting of networks should be shortened or established where missing						
* Deadlines for the permitting of Projects of Common Interest and Project of Mutual Interest should be shortened and clarified to reflect the urgency in implementing these projects						
* The permitting procedures for storage should be simplified*						
* The permitting procedures for distribution network projects and small-scale renewable projects, as well as repurposing, refurbishment and repowering should be simplified*						
* The permitting procedures for hybrid projects (combining different technologies, including storage) and other innovative solutions should be simplified						

Other:

-

(*) Please specify:

-

Facilitating investments in grid infrastructure

Article 16 of the TEN-E Regulation facilitates investments with cross-border impact through a cross-border cost allocation (CBCA) framework where the relevant national regulatory authorities (NRAs) jointly agree on CBCA decision. Where there is no agreement among the NRAs, they may jointly request ACER to decide on the investment request including the CBCA.

Q13: To what extent do you agree with the following statements?

	Strongly disagree	Slightly disagree	Neutral	Slightly agree	Strongly agree	Don't know
* The current cross-border cost allocation (CBCA) framework is fit for purpose	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* An investment request within the CBCA framework could also cover several projects ('bundling') to facilitate cost sharing amongst more Member States beneficiaries	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
* The CBCA framework should be developed further to facilitate that investment costs are shared amongst countries, beyond hosting Member States, in proportion to the expected benefits	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
* The role of involved actors (Member States, NRAs, ACER, TSOs) should be revised to facilitate the process*	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

Other:

-

(*) Please specify:

Please refer to our position paper. The current CBCA framework contains too many limitations for effective cost sharing and lacks transparency. In particular, the interests of industrial grid users are not sufficiently considered. The involvement of representative market organisations, including those representing energy-intensive industry, should be structurally integrated into the CBCA process.

Q14: To what extent other instruments or tools (beyond CBCA) should be considered or modified to facilitate financing of cross-border infrastructure?

	Strongly disagree	Slightly disagree	Neutral	Slightly agree	Strongly agree	Don't know
--	-------------------	-------------------	---------	----------------	----------------	------------

* Inter-Transmission System Operator Compensation (ITC) mechanism	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
* Sharing of congestion income	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
* Common/regional regulated asset base (RAB)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Ex post conditionalities	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

Other:

-

Funding the necessary grid reinforcements and adaptations will require mobilisation of significant financial resources. Grid operators, both at the transmission and distribution levels, are faced with an unprecedented increase in the volume of capital expenditure possibly affecting credit rating and access to capital.

Q15: In your view, which financial obstacles are most relevant for investments in infrastructure projects?

	Strongly disagree	Slightly disagree	Neutral	Slightly agree	Strongly agree	Don't know
* Access to debt	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Access to equity	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Access to counter-guarantees	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Regulatory risk	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Access to public funding (EU/national)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

Other:

-

Q16: If needed, what financial measures could be considered to further support transmission infrastructure? Please specify.

Cost sharing measures

Intertemporal cost allocation mechanism

Financial state guarantees and risk-sharing mechanisms

Subsidy

Q17: If needed, what financial measures could be considered to further support distribution infrastructure? Please specify.

Cost sharing measures
Intertemporal cost allocation mechanism
Financial state guarantees and risk-sharing mechanisms
Subsidy

Q18: If needed, what financial measures could be considered to further support hydrogen infrastructure? Please specify.

Cost sharing measures
Intertemporal cost allocation mechanism
Financial state guarantees and risk-sharing mechanisms
Subsidy

Q19: If needed, what financial measures could be considered to further support CO₂ infrastructure? Please specify.

Cost sharing measures
Intertemporal cost allocation mechanism
Financial state guarantees and risk-sharing mechanisms
Subsidy

Supply chains

Constrained supply chains and a lack of skilled workforce are being cited the major hurdles hindering grid development. The 2023 Action Plan for Grids included concrete action to address the often fragmented technical requirements for grid components through a common specifications workstream, as well as the need for greater visibility on future investments planned. The Union of Skills package adopted on 5 March 2025 targets the identified gap in skills - particularly those needed for the energy transition, investing in people for competitiveness, reinforcing the Competitiveness Compass and the Clean Industrial Deal.

Q20: To what extent do you agree with the following statements?

	Strongly disagree	Slightly disagree	Neutral	Slightly agree	Strongly agree	Don't know
* The current network development plans at EU and national level provide sufficient visibility for the supply chain for the purpose of investment planning	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* There is a need for better visibility to ensure sufficient investment in the supply chains	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

* Please specify:

-

Q21: To what extent do you agree with the following statements?

	Strongly disagree	Slightly disagree	Neutral	Slightly agree	Strongly agree	Don't know
* There is a need for further harmonisation of equipment requirements within the EU, for the purpose of scaling up supply chains and their repair capacities	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

Other:

-

* Q22: Is there a need for additional EU action to address supply chain bottlenecks in the energy sector, following recent initiatives?

- ☐ Strongly disagree
- ☐ Slightly disagree
- ☐ Neutral
- ☐ Slightly agree
- ☒ Strongly agree
- ☐ Don't know

* Q23: Is there a need for additional EU action in the field of skills for the energy sector, following recent initiatives, such as the Union of Skills?

- ☐ Strongly disagree
- ☐ Slightly disagree
- ☐ Neutral
- ☐ Slightly agree
- ☐ Strongly agree
- ☒ Don't know

Digitalisation and resilience

Digitalised and resilient grids are essential from a security of supply perspective. Actions were put forward also as part of the Action Plan for Grids adopted in 2023. By the end of 2025, a common Technopedia Platform operated by the ENTSO-E and the EU DSO entity should materialize, providing an overview of

existing grid enhancing technologies. Enhancing the security and resilience of cross-border energy infrastructure projects is crucial for ensuring a reliable supply of energy. It is also a key priority of the current Commission mandate, especially in the context of emerging risks such as climate change impacts and malicious attacks on critical energy infrastructure.

Digitalisation

* Q24: Do you agree that there is a need for additional EU action concerning visibility and quantified benefits of innovative, digital and grid enhancing technologies?

- ☐ Strongly disagree
- ☐ Slightly disagree
- ☐ Neutral
- ☐ Slightly agree
- ☒ Strongly agree
- ☐ Don't know

* Q25: In your view, should there be further measures to increase the efficiency of the existing grid?

- ☒ Yes
- ☐ No

* If yes, please specify:

Security and resilience

Q26: To what extent do you agree with the following statements?

	Strongly disagree	Slightly disagree	Neutral	Slightly agree	Strongly agree	Don't know
* The current EU legal framework, beyond the TEN-E Regulation, sufficiently addresses resilience and security criteria for cross-border infrastructure projects including recent and emerging risks such as climate change impacts	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Projects of common interest (PCIs) and Projects of mutual interest (PMIs) should be subject to additional security criteria to reduce exposure and/ or	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

enhance readiness against physical and cyber risks						
* The existing EU legal framework for grids, beyond the TEN-E Regulation, allows to avoid non-trusted actors' participation in critical cross-border infrastructure projects	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

Other (please specify):

-

Flexibility

Pursuant to the existing EU regulatory framework, distribution network development plans shall provide transparency on the medium and long-term flexibility services needed and consider alternatives to grid development (such as flexibility, demand response or innovative grid technologies). There is also ongoing work between TSOs, DSOs, ACER and the Commission following up on the most recent revision of the Regulation (EU) 2019/943 on the internal market for electricity in 2024, mandating the regulatory authorities or dedicated authorities to conduct biannual assessment of flexibility needs. The relevant methodology, explaining inter alia the link to the network planning should be adopted in Q3 2025.

* Q27: In this context, do you agree that the existing framework is sufficient for considering flexibility needs in network planning and development

- ☒ Strongly disagree
☐ Slightly disagree
☐ Neutral
☐ Slightly agree
☐ Strongly agree
☐ Don't know

Simplification

Q28: In view of simplifying the PCI/PMI selection process, to what extent do you agree with the following statements?

	Strongly disagree	Slightly disagree	Neutral	Slightly agree	Strongly agree	Don't know
* The current frequency of the PCI /PMI selection process (every 2 years) should be decreased e.g. every 3 years	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

* Project with PCI/PMI status should not be required to reapply for each PCI/PMI process, provided certain conditions are met (e.g. sufficient maturity, progress)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
* The application process should be further simplified	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

Please specify your reply providing, where possible, qualitative and quantitative evidence.

-

Q29: In view of additional simplification measures, to what extent, do you agree that there is potential for simplification in the following areas?

	Strongly disagree	Slightly disagree	Neutral	Slightly agree	Strongly agree	Don't know
* TYNDP process: Scenario building	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* TYNDP process: infrastructure gap identification	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* TYNDP process: Project assessment	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Offshore network development planning process	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* PCI/PMI project monitoring and reporting	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

Please specify your reply providing, where possible, qualitative and quantitative evidence.

-

Contact

ENER-C4-PROJECTS@ec.europa.eu

