

**Implementation Guidance Document Development:
Cost Benefit Analysis Workshop**

**COMMENTS RECEIVED ON CBA IGD
DURING PUBIC CONSULTATION**

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Brussels

02. March 2017

Agenda

- **High Level overview of the Consultation on Implementation Guidance Documents**
- **Detailed Comments on CBA IGD**

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High Level Overview of the Consultation on Implementation Guidance Documents

In Numbers:

- 19 IGDs were consulted
- 16 answers received, with some duplication resulting in ~8 different sets of comments.
- 1.5 months consultation period from beginning of July to mid-August

General comments:

- Need of earlier and more intense stakeholder involvement in nation implementation processes
- Need of a similar structure/content for all the IGDs; ENTSO-e should explain the structure of each IGD and the categories within.
- More technical details and values for parameters of non-exhaustive requirements
- Insufficient transparency of the and coordination/collaboration at TSO-TSO/TSO-DSO on national decision making processes
- Missing indications / proposals on solutions for non-exhaustive requirements (in particular lack of harmonization of values)
- Lack of justification (technical details, system studies, etc.) and CBA for national decisions

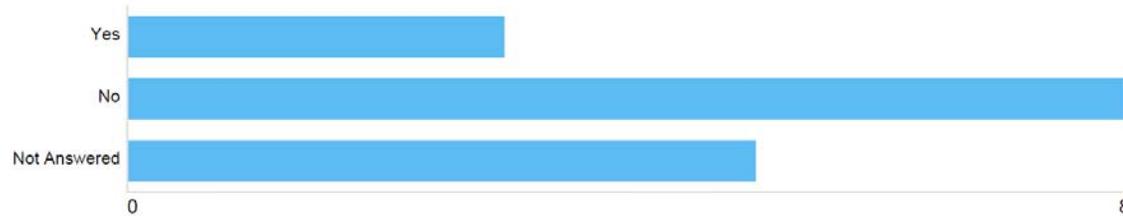
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General guidance on Cost-benefit analysis (1/2)

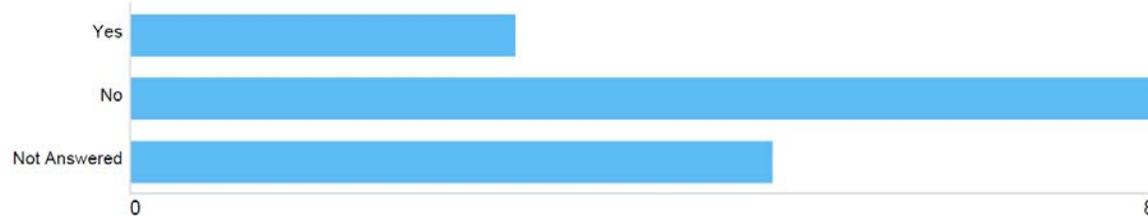
Question 6: For this IGD please give us your comments on:

Do you consider this IGD helpful to reasonably support the national implementation process?



Option	Total	Percent
Yes	3	18.75%
No	8	50.00%
Not Answered	5	31.25%

Does the content of the IGD cover the technical issues of this topic appropriately?



Option	Total	Percent
Yes	3	18.75%
No	8	50.00%
Not Answered	5	31.25%

Comments on the technical information within this IGD

There were 9 responses to this part of the question.

General (other) comments

There were 10 responses to this part of the question.

General guidance on Cost-benefit analysis (2/2)

Main comments:

- The IGD could benefit from examples of good practices
- Comments propose to recommend CBAs for non-exhaustive/non-mandatory requirements.
- The different parties involved in the process and their responsibilities could be clearly defined, including the way the CBA conclusions shall be evaluated
- CBA shall address operational and market-based alternatives
- A 1 month public consultation on the quantitative CBA elaborated by the TSO seems to be much too short for grid users considering the potential consequences at stake.
- Further guidance should be provided, for instance:
 - on how to ensure consensus on the quality of the data used
 - on the conditions to use non-public or confidential data provided by power generating facility owners
 - on the methodology to assess the impacts of interconnections
 - or on the methodology to assess alternative solutions
- To organize dedicated workshop to elaborate common proposals to refine the process and prepare a more detailed guidance on CBA methodology.

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