



CEEP feedback on the roadmap of the revision of Regulation on guidelines for trans-European energy infrastructure (TEN-E Regulation)

Central Europe Energy Partners (CEEP) welcomes the initiative to revise the guidelines for trans-European Energy infrastructure. This regulation has been crucial for better integration of European energy markets. Particularly in Central and Eastern Europe it has allowed, via PCI process and CEF funding, to plan, build and operate number of projects which contribute to the development on internal energy market.

Thanks to the provisions included in TEN-E regulation, in the recent years Central European Member States were able to participate in many initiatives, which elevated the energy infrastructure of is region to a new level. Regulation proved to be an effective instrument facilitating development of the key energy infrastructure projects. However, many of this projects are still in the phase of planning and implementation.

In our view, to ensure the coherence of the TEN-E Regulation and the EU energy and climate targets for 2030 and the EU long-term decarbonisation commitment, it is crucial to enable financing also for network development needed for RES integration, even if such network has limited cross-border relevance. As it may raise concerns due to the very large number of RES projects, the relevant threshold may be introduced.

We would also like to point out that current threshold for assessing cross-border relevance (500 MW) seems unjustifiably high as it may limit the possibility to obtain financing from CEF by the DSOs' projects, which levels of cross-border relevance are significantly lower than the TSOs' ones. As such, the current threshold may be deemed discriminatory, favoring TSOs' projects. Therefore, we believe that this threshold should be lowered.

We believe that the gas projects should remain within the scope of TEN-E. It is important to admit that the gas, as an energy source, offers a stable and low emission source that can back up intermittent RES generation and thus facilitate their deployment. It can also contribute to a just transition to climate neutrality.

The existing gas infrastructure can be easily expanded or modernised helping cut emissions, i.e. in the heating and household sectors. It can also be adapted to transport and use of renewable gases and hydrogen. It will equally reduce dependency on energy imports and provide positive socioeconomic benefits to the EU.



Furthermore, as so far, the new TEN-E regulation should promote projects to ensure security of supply and market integration. These are the main two benefits of the current regulation.

The revision should also take a closer look at the changing pattern of the energy systems and its need of greater flexibility and digital services. It should also focus on possible synergies with other sectors, such as transport, heating, cooling and industry.

In our view the thematic areas and scope of TEN-E should be expanded to include new dimensions of the future energy systems:

- Renewable gases, biogas, hydrogen and other low carbon gaseous fuels
- undergrounding of electricity transmission lines,
- cybersecurity with cross-border projects
- energy storage systems, particularly pumped storage plants
- smart grids at all voltage levels
- transborder RES projects, particularly offshore wind hubs
- e-mobility and electrification of heating & cooling