

**Format per la raccolta delle osservazioni  
sui Piani decennali di sviluppo della rete di trasporto del gas naturale per gli anni 2019 e 2020,  
sulle ipotesi di scenario energetico adottate e sulla proposta di aggiornamento dei Criteri applicativi dell'ACB**

<b>Soggetto</b>	
<b>Tipo di società*</b>	<i>European Federation of Energy Traders (EFET)</i>
<b>Sito web*</b>	<a href="https://www.efet.org/">https://www.efet.org/</a>

\* Da comunicare solo se il soggetto agisce in nome e per conto di una Società.

<b>Spunto</b>		<b>Riferimento</b>
<b>S1.</b>	<b>Osservazioni sulle modalità di predisposizione dei Piani di Sviluppo e sul coordinamento tra gestori di trasporto.</b>	Deliberazione 468/2018/R/GAS Deliberazione 230/2019/R/GAS
We support having the TYNDPs every two years. This is also the practise for the ENTSOs at European level.		

<b>Spunto</b>		<b>Riferimento</b>
<b>S2.</b>	<b>Commenti riguardanti la definizione degli scenari energetici di riferimento, la disponibilità e la trasparenza delle informazioni di input e di output e le metodologie utilizzate per la loro elaborazione, nonché la loro correlazione con le ipotesi usate a livello europeo e a livello nazionale nel settore energetico.</b>	Deliberazione 468/2018/R/GAS Deliberazione 230/2019/R/GAS Piani decennali di sviluppo dei gestori di rete di trasporto Documento di descrizione degli scenari predisposto da Terna/Snam Documento di descrizione degli scenari predisposto da Enura
No comments.		

<b>Spunto</b>		<b>Riferimento</b>
<b>S3.</b>	<b>Commenti riguardanti le evidenze del funzionamento del sistema gas, con particolare riferimento agli anni 2018-2019, le criticità attuali e il loro ruolo ai fini di orientare le esigenze di rinnovo e/o sviluppo delle infrastrutture di trasporto del gas.</b>	Piani decennali di sviluppo dei gestori di rete di trasporto
No comments.		

<b>Spunto</b>		<b>Riferimento</b>
<b>S4.</b>	<b>Commenti riguardanti le criticità del sistema gas previste in futuro, i flussi di gas attesi e le correlate esigenze di rinnovo e/o sviluppo delle infrastrutture di trasporto del gas, anche in relazione agli scenari e agli obiettivi di decarbonizzazione ipotizzati dal Piano Nazionale Integrato per l'Energia e il Clima redatto dal Ministero dello Sviluppo Economico.</b>	Piani decennali di sviluppo dei gestori di rete di trasporto Documento di descrizione degli scenari predisposto da Terna/Snam Documento di descrizione degli scenari predisposto da Enura
No comments.		

<b>Spunto</b>		<b>Riferimento</b>
<b>S5.</b>	<b>Commenti sugli interventi di rinnovo e/o sviluppo della Rete Nazionale e della Rete Regionale di Gasdotti rappresentati nei Piani di Sviluppo 2019 e 2020.</b>	Piani decennali di sviluppo dei gestori di rete di trasporto
No comments.		

<b>Spunto</b>		<b>Riferimento</b>
<b>S6.</b>	<b>Commenti riguardanti le opportunità di sviluppo della capacità di interconnessione contenute nei Piani di Sviluppo 2019 e 2020, nonché i possibili impatti sulla rete di trasporto esistente.</b>	Piani decennali di sviluppo dei gestori di rete di trasporto
No comments.		

<b>Spunto</b>		<b>Riferimento</b>
<b>S7.</b>	<b>Commenti sullo stato di avanzamento dei Piani di Sviluppo precedenti e sulla qualità e la completezza delle informazioni disponibili nei Piani di Sviluppo 2019 e 2020.</b>	Deliberazione 468/2018/R/GAS Piani decennali di sviluppo dei gestori di rete di trasporto
No comments.		

<b>Spunto</b>		<b>Riferimento</b>
<b>S8.</b>	<b>Commenti e osservazioni in relazione allo sviluppo coordinato tra infrastrutture funzionalmente interconnesse (quali quelle di trasporto e di distribuzione), in particolar modo nelle aree di nuova metanizzazione, anche in relazione a rischi di duplicazione o di sviluppi disfunzionali delle infrastrutture.</b>	Deliberazione 468/2018/R/GAS Deliberazione 230/2019/R/GAS
No comments.		

<b>Spunto</b>		<b>Riferimento</b>
<b>S9.</b>	<b>Commenti sulla qualità e completezza delle informazioni in merito ai costi consuntivati e stimati, relativi sia ai singoli interventi sia al Piano di ciascun gestore.</b>	Deliberazione 468/2018/R/GAS Deliberazione 230/2019/R/GAS Piani decennali di sviluppo dei gestori di rete di trasporto
No comments.		

<b>Spunto</b>		<b>Riferimento</b>
<b>S10.</b>	<b>Commenti sugli aspetti metodologici delle Analisi Costi–Benefici contenute nei Piani dei gestori, nonché sulla loro capacità di rappresentare l’efficacia e l’efficienza degli interventi di sviluppo della rete di trasporto e più in generale l’utilità degli investimenti per il sistema energetico.</b>	Deliberazione 468/2018/R/GAS Deliberazione 230/2019/R/GAS Piani decennali di sviluppo dei gestori di rete di trasporto
No comments.		

<b>Spunto</b>		<b>Riferimento</b>
<b>S11.</b>	<b>Commenti in relazione all’Appendice informativa ai Criteri applicativi dell’Analisi Costi-Benefici e in particolare relativamente alle assunzioni, ai parametri di base e ai costi <i>standard</i> ivi contenuti.</b>	Deliberazione 468/2018/R/GAS Deliberazione 230/2019/R/GAS Criteri applicativi ACB
No comments.		

<b>Spunto</b>		<b>Riferimento</b>
<b>S12.</b>	<b>Commenti in relazione alla proposta di aggiornamento dei Criteri applicativi dell’Analisi Costi Benefici.</b>	Deliberazione 468/2018/R/GAS Proposta di aggiornamento dei Criteri applicativi
No comments.		

**Eventuali ulteriori osservazioni**

<b>Nr. progressivo</b>	<b>Gestore/i cui l'osservazione fa riferimento</b>	<b>Capitolo/i del Piano</b>	<b>Osservazione</b>
------------------------	--	---------------------------------	---------------------

1	SNAM	<p>The European Federation of Energy Traders (EFET) welcomes the opportunity to provide our comments to Snam's consultation on the TYNDP.</p> <p>We appreciate that on 15 April 2020, Snam and Terna have renewed a Memorandum of Understanding to relaunch and extend their collaboration and implement common initiatives. The agreement is specifically aimed at enhancing the potential synergies between gas and electricity systems, including dual fuel compression plants.</p> <p>We support the energy system integration coordination at national level that we have also seen at European level between the ENTSOs<sup>1</sup>. The European Commission also set out the EU Strategy for Energy System Integration<sup>2</sup>.</p> <p>We understand that Snam is planning to convert its compression and storage facilities into gas-electric plants, with a view to develop new flexible resources for the electrical grid. As written in the TYNDP, Snam would like to convert its compression plants into dual fuel plants, which can therefore be powered by both gas and electricity.</p> <p>However, we see the risk that, as Snam itself states in the TYNDP, it may offer flexibility services which are, and must remain, a competing activity carried out by market participants. Current unbundling rules provide for the separation of regulated monopoly system operation from all the other competitive activities in the sector, ensuring that Transmission System Operators (TSOs) and Distribution System Operators (DSOs) act as neutral facilitators of the market.</p> <p>The gas TSO, instead of using gas to push it into gas pipelines as it currently does (self-consumption gas covered by the gas tariffs), in the future could use:</p> <ol style="list-style-type: none"> <li>1. electricity by absorbing it from the network. When there is a surplus, the gas TSO would activate the compressors with electricity, and in this way, it can offer a service to the electricity TSO in the ancillary services market (<i>a scendere</i>).</li> <li>2. gas, when there is an electricity shortage, to activate natural gas compressors and in this way, it can offer a service to the electricity TSO in the ancillary services market (<i>a salire</i>).</li> <li>3. In addition, if the second service is not enough to cover the electricity shortage, it could also increase the supply of electricity to the grid by producing electricity with gas compressors.</li> </ol>
---	------	---

---

<sup>1</sup> See [EFET recommendations for a future EU strategy on energy system integration](#)

<sup>2</sup> See [Powering a climate-neutral economy: Commission sets out plans for the energy system of the future and clean hydrogen](#)

		<p>Therefore, Snam would have the possibility in the future to arbitrage, based on its convenience and Terna's needs.</p> <p>Furthermore, in ARERA's consultation on innovative gas pilot project 39/2020/R/gas, the NRA proposed bi-power compression systems on gas transmission networks to extend the use of current turbines for gas compression to the production of electricity<sup>3</sup>.</p> <p>We argue that Snam initiative is not in line with the EU and national unbundling rules and with the EU Directive 2009/73 and Legislative Decree 93/11 because Snam as a gas TSO cannot offer flexibility services for electricity and cannot produce electricity.</p> <p><b>Whole system approach and a potential role for hydrogen</b></p> <p>On hydrogen, we understand that the current TYNDP does not provide much detail in line with ARERA's Decision 335/2019/R/Gas. Yet, replacement of natural gas with hydrogen allows the gas system to play an ongoing role in a decarbonised framework using existing assets in many cases.</p> <p>Ultimately, there could be dedicated hydrogen grids, but in the interim, opportunities may exist for blends or co-transportation, subject to design of new operational frameworks and the ability to overcome current technical constraints such as burners being able to accommodate a variable mix. EU support to kick-start the hydrogen market, and in particular to ensure that hydrogen is not disadvantaged against other technologies through the design of support schemes and allocation of transport infrastructure costs, will help to achieve a more efficient decarbonisation strategy<sup>4</sup>.</p> <p>To the extent that a hydrogen grid may be widespread and replace large parts of the natural gas transportation and distribution networks, then it is likely to be in a monopolistic position. Even in markets where pipe to pipe competition exists (such as in North America), there is still a strong requirement for regulation. Nevertheless, just as there are closed systems where TPA may not be relevant, or particular pieces of infrastructure where an exemption may be granted, or upstream networks where access is negotiated, there may also need to be some flexibility.</p>
--	--	--

<sup>3</sup> [EFET response to ARERA consultation 39-2020 on gas pilot projects and sector coupling](#)

<sup>4</sup> See [EFET comments on the Roadmap for an EU Hydrogen Strategy](#) and [EU Hydrogen Strategy](#)



			<p>The creation of an internationally traded market is also unlikely unless there are compatible and at least harmonised access rules. Experience has shown that regulation has been essential in creating convergence of access terms to facilitate trading.</p> <p>It also seems intuitive that transportation of hydrogen through dedicated systems and transportation of hydrogen through natural gas networks should not be different without good reason related to physical characteristics. This also suggests that a regulatory framework is advisable.</p> <p>A hydrogen market should not be seen in isolation. A coherent view of hydrogen, natural gas and electricity in a number of regulatory aspects is needed in order to foster the development of sustainable markets with functioning connections to one another. This includes, but is not limited to:</p> <ul style="list-style-type: none"><li>• Tariff-setting and cost allocation procedures including rules for value assessments for conversion of infrastructure between natural gas and hydrogen, how to deal with the issue of sunk costs for parts of infrastructure etc.</li><li>• Network planning including European guidelines on transparency and assessment in case of competing network expansion solutions between power, natural gas and hydrogen.</li><li>• Balancing, alignment of rules between natural gas and hydrogen, especially in case of blended networks</li><li>• Interoperability</li></ul> <p>In the early phases of balancing, some additional tools may be necessary to ensure that TSOs are able to ensure the system remains safe, until the market reaches maturity and is able to deliver balancing services economically. Investment in new hydrogen storage, repurposed natural gas storage, demand management and production flexibility will need to be justified by price volatility and seasonality. This may also reveal the contribution of sustainable (blue, turquoise, green etc.) hydrogen in being able to deliver flexible production that helps grids to accommodate growing levels of renewable and decarbonised hydrogen – and higher levels of peak RES production - by allowing for a more flexible supply.</p> <p>Any regulatory framework should include procedures for modification, to allow frameworks to respond to new challenges, technologies and services arising.</p>
--	--	--	--

		<p><b>Utilising market-based mechanisms and adapting market instruments whenever financial support for new, low carbon energy sources is considered, while respecting sectoral unbundling rules</b></p> <p>Hydrogen must become part of the European internal energy market, which has been an enormous achievement since implementation of the early Electricity and Gas Directives, and contribute to the overall efficiency of the energy system. Nevertheless, it is recognised that existing hydrogen markets will be impacted and consideration should be given to the different end-markets that will be affected.</p> <p>In order to achieve this, market participants, regulators, TSOs and DSOs could contribute through:</p> <ul style="list-style-type: none"><li>• Providing clear price signals to incentivise investment in the most cost-effective decarbonisation solutions and technologies and enabling the deployment in the most cost effective locations, irrespective of Member State borders.</li><li>• Underpinning a level playing field for technology developers, so that cross-subsidisation or subsidy pancaking for particular technologies may be avoided.</li><li>• Facilitating optimisation of grid infrastructure at transmission and distribution levels and increasing integration of power and gas infrastructure.</li><li>• Ensuring that producers and suppliers using various technologies face whole system price signals reflecting the costs they impose on gas and power networks, and that economic behaviour and commercial decisions are not distorted by misallocation of legacy system costs that have been irreversibly incurred, nor by the costs of unwarranted expansion and reinforcement of grids in future.</li></ul> <p>In order to ensure a harmonised regulatory framework for the future gas market in Europe and in Italy, where hydrogen, as well as other low carbon, renewable and decarbonised gases, are set to play a more prominent role, the European Network Codes and other existing regulations such as Renewable Energy Directive II and national legislation should be reviewed and adapted accordingly.</p> <p>Further work is necessary to understand how flexibility markets in hydrogen supply can be achieved to allow consumers to be supplied. The roles of storage, demand side management,</p>
--	--	---

			<p>and controllable production of sustainable hydrogen will be fundamental to the sector's ability to contribute to an efficient, integrated, decarbonised energy system.</p> <p>Regulated system operators should maintain their role of neutral market facilitators and similar principles should be extended to new services and technologies including production activities. The construction, ownership and operation of such installations should therefore be provided by the market to ensure optimal use of such assets.</p>
--	--	--	--