E R E F
European Renewable Energies Federation

Brussels 10.07.2020

Feedback on TYNDP 2022 Storyline Development

EREF welcomes that ENTSO-E and ENTSOG have identified the Green Transition as one of the main drivers for future energy landscape development. EREF also welcomes the efforts in more transparency by publishing stakeholder feedback in the future before the publication of the final report. However, as the Green Transition has been rightly identified as a main driver, in this context we strongly urge an incorporation of current research findings and policy developments in the TYNDP Storyline and Scenario Development.

First of all, it is crucial that the target numbers and calculations include a model for a GHG reduction of 65% for 2030. This is in line with numerous research findings like the UN Emissions Gap Report 2019[1] that sees a reduction of 65% as the only way to fulfil the obligations of the Paris Agreement. For 2050 as well, the EU's target of carbon neutrality is no longer compatible with a reduction target of 80-95%. These research findings gather more and more momentum in the current EU policy discussion, e.g. by the EP's Climate Law Rapporteur Jytte Guteland, and as such have the potential to be enshrined into EU law in the near future. Given the serious discussion about increasing the COM proposal of 50-55% to 65%, not even considering the possibility of a reduction of 65% in the storylines would not only ignore scientific knowledge, but also political reality. As such, it is incomprehensible to ignore a 65% target for the 2 top-down scenarios that are supposed to be compliant with the Green Deal and the Paris Agreement.

As for the energy mix used as a baseline, the role of renewable energies is being underrated; there is not a single scenario envisaging 100% RES. For example, the role of hydropower is vastly underestimated in the current modelling, even though hydropower is one of the largest energy sources within the EU. In this context, the potential of electricity storage in reservoirs should be acknowledged further as electricity balancing drivers. The capacity factor of RES, especially wind, has developed a lot over the last years but it is not yet acknowledged accordingly in your scenarios. At the same time, scenarios without nuclear should be considered. Nuclear new-build cannot be built without hefty support and represents a high-risk option, with a marked tendency for significant delay and cost over-run. This technology only managed to stay on the market with the constant help of heavy subsidies – the end of such subsidies needs to be envisaged as an option.

[1] UN environment programme 2019, Emissions Gap Report 2019, https://wedocs.unep.org/bitstream/handle/20.500.11822/30797/EGR2019.pdf?sequence=1&isAllowed=y.

Furthermore, the first proposals overall heavily rely on unproven technologies such as hydrogen and CCS. Whilst those technologies might have the potential to play an important role for some applications or – later – for negative emissions, where they are needed when emissions cannot be avoided, it is important to include scenarios without them, only based on renewable energy and energy efficiency. On one hand, it seems self-evident to have a scenario that only relies on technologies that have already proven to be both sustainable and economical as a conservative approach. Regarding the reliance on CCS, there is a real danger in relying on its potential as there is already comprehensive science pointing to the technology being more problematic than previously considered - a 2016 report commissioned by COM[2] found that 85% of carbon offset programs analysed overestimated their reduction benefits at best and at worst failed to reduce emissions at all. Aiming at large scale use of CCS and other abatement (and use) technologies also tends to increase the risk of delaying the necessary reductions, which again would go against the Paris Agreement.

Lastly, it is incomprehensible for measures concerning a fossil gas phase-out to only be considered for the time frame 2040-2050. In the webinar, it was pointed out that gas is the short time solution for the coal phase-out. Whilst this idea may have theoretical merits based on the assumption that gas is the lesser evil out of those two in terms of GHG emissions, this assumption already has been scientifically challenged due to the higher climate damage from methane in general and due to carbon leaks from pipelines[3]. Bridge technologies are economically and climate protection wise detrimental and only to be used when actually needed. It is irresponsible to lock in fossil gas as an alleged bridge technology as the rapid technology development and cost decrease of renewable technology allows and requires to accelerate the full transition to renewables already today and most certainly well before 2040. As European Institutions like the EIB are currently working on the assumption that investments in fossil gas have to be written off after 10-15 years, it is not clear why a full fossil phase-out should happen only at such a late stage. As was pointed out, it is difficult to factor in the costs of stranded assets. However, that does not mean that those should only be considered in the scenarios as "costs for decommissioning", as seems to be the current approach. Investing in fossil gas infrastructure for the next 20 years would prove a bad investment and an immense misdirection of funds, especially given that, even if green hydrogen can fully develop its potential, its infrastructure needs are not congruent with those of fossil gas.

[2] Öko-Institut e.V. 2016, How additional is the Clean Development Mechanism? https://ec.europa.eu/clima/sites/clima/files/ets/docs/clean_dev_mechanism_en.pdf.
[3] DIW Berlin 2020, Make the European Green Deal Real – Combining Climate Neutrality and Economic Recovery, p. 22 ff. https://www.diw.de/documents/publikationen/73/diw_01.c.791736.de/diwkompakt_2020-153.pdf.