

Klaus-Dieter Borchardt
Director – Internal Energy Market
DG ENER
European Commission
Rue de la Loi 200,
1049, Brussels

Brussels, 14 December 2017

Dear Mr. Borchardt,

The European electricity sector is committed to the Paris Agreement and has recently announced its pledge to deliver carbon-neutral electricity well before 2050.

Meeting these goals will require substantial cost-efficient investment in grid infrastructure to remove bottlenecks, integrate renewables into the market, ensure competition and guarantee security of supply. We are therefore pleased to have been offered the opportunity to participate and provide input to the European Commission's expert group on the "Achievement and operationalisation of the interconnection target for 2030" and we will continue monitoring the next developments.

EURELECTRIC shares the conclusions of the "Report of the Commission expert group on electricity interconnection targets"¹.

We have nevertheless noticed that the European Commission's communication on "strengthening Europe's energy networks" (23 November 2017) focuses on some key findings of the report, however leaving other important conclusions aside. While recognising the paramount importance of a better utilisation of existing infrastructures and the set of three thresholds determined by the expert group, the communication indeed seems to overlook the report conclusion that the 15% interconnection target "would not be suited to the reality after 2020 and would not adequately account for the identified benefits and prerequisites for the development of the interconnectors".

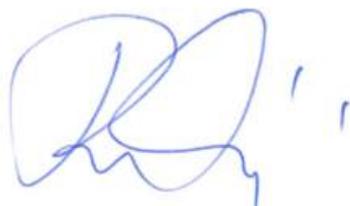
Furthermore, the communication forgets to mention the sine qua non condition reached in the expert group's report that a CBA is a "prerequisite for any investment decision in line with the methodology developed by ENTSO-E as part of the Ten-Year Network Development Plan and selection of Projects of Common Interest." This obligation of a CBA before any investment decision on interconnectors was however mentioned in the ["Questions and answers on the projects of common interest \(PCIs\) in energy and the electricity interconnection target"](#).

We would appreciate that in future initiatives related to infrastructure development, the EC takes duly into account the recommendations of the Expert Group”.

Thank you again for this opportunity and we remain committed to the next steps.

Should you have any questions, please do not hesitate to contact Charlotte Renaud (crenaud@eurelectric.org; +32 2 515 10 55) and/or Marion Labatut (mlabatut@eurelectric.org; +32 2 515 10 51).

Yours sincerely,



Kristian Ruby
Secretary General, EURELECTRIC

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https://ec.europa.eu/energy/sites/ener/files/documents/report_of_the_commission_expert_group_on_electricity_interconnection_targets.pdf