

ENTSOs' public consultation on the TYNDP 2026 Economic Variants Development Methodology

Eurelectric response paper

Eurelectric represents the interests of the electricity industry in Europe. Our work covers all major issues affecting our sector. Our members represent the electricity industry in over 30 European countries.

We cover the entire industry from electricity generation and markets to distribution networks and customer issues. We also have affiliates active on several other continents and business associates from a wide variety of sectors with a direct interest in the electricity industry.

We stand for

The vision of the European power sector is to enable and sustain:

- A vibrant competitive European economy, reliably powered by clean, carbon-neutral energy
- A smart, energy efficient and truly sustainable society for all citizens of Europe

We are committed to lead a cost-effective energy transition by:

investing in clean power generation and transition-enabling solutions, to reduce emissions and actively pursue efforts to become carbon-neutral well before mid-century, taking into account different starting points and commercial availability of key transition technologies;

transforming the energy system to make it more responsive, resilient and efficient. This includes increased use of renewable energy, digitalisation, demand side response and reinforcement of grids so they can function as platforms and enablers for customers, cities and communities;

accelerating the energy transition in other economic sectors by offering competitive electricity as a transformation tool for transport, heating and industry;

embedding sustainability in all parts of our value chain and take measures to support the transformation of existing assets towards a zero carbon society;

innovating to discover the cutting-edge business models and develop the breakthrough technologies that are indispensable to allow our industry to lead this transition.

TYNDP Drafting Team
All Committees

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How would you overall rate the draft economic variants methodology? (choose between 1 to 10 – 10 being most satisfactory)

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5. Do you think that the draft methodology for building economic variants could be improved and if yes, why and how?

Overall, we think the methodology serves its purpose to perform a stress test on a given basic scenario. However, due to model-endogenous decisions, we would greatly appreciate as much transparency as possible—both in the methodology and the results. For example, providing access to an Excel spreadsheet or similar documentation showing how sectoral activities and technologies are varied, and how these variations affect outcomes, would enhance clarity and credibility.

For future analyses, it would be helpful if, in addition to 10% variations, different step sizes were also analysed. Depending on the dispatch model and cost structure, certain high-sensitivity reactions may occur.

Furthermore, it would be valuable to test structural shocks—such as technology breakthroughs, supply chain disruptions, changes in energy sector structures or behavioral shifts—which may have non-linear impacts on system dynamics.

6. Is there anything that you would like to add?

Regarding Slide 12 in the methodology shared, we agree that supply capacities should remain unchanged for the stress tests. Due to the long-term nature of investment decisions, the influence of input parameters such as the carbon price over time is reflected in different scenarios and should not form part of this sensitivity analysis.

We would like to add to the EC's comment that supply capacities may be adjusted in the event of non-convergence: any necessary adjustments should be transparent and treated seriously, as this would be a key outcome of the stress test. Such results suggest a long-term sensitivity that warrants further investigation to determine the optimal solution, e.g. regarding installed capacities. This would require analysis beyond this stress test.

In addition, we want to emphasize that the resulting change in system costs should be shared—e.g. due to Renewable Extra-EU imports decided by the model.

The new TYNDP approach, with a central NECP-based scenario and two economic variants, brings welcome clarity and policy alignment. However, focusing mainly on macroeconomic parameters may limit exploration of other key uncertainties—such as societal behavior, decentralisation, and disruptive innovation. Adding a few exploratory or normative scenarios would broaden the scope, improve resilience testing, and better support long-term infrastructure and policy decisions.

Exploratory scenarios could include high-electrification pathways, many-futures solutions, and decentralized systems, increasingly relevant in light of recent policy and market developments. It is also important that economic variants provide a systemic view and remain interoperable with national plans and the PCI selection process, to avoid misalignment in infrastructure planning.

Finally, a more granular breakdown of system costs—including grid reinforcement and key investment areas—would help stakeholders better understand the implications of each variant.

Eurelectric pursues in all its activities the application of the following sustainable development values:

Economic Development

- Growth, added-value, efficiency

Environmental Leadership

- Commitment, innovation, pro-activeness

Social Responsibility

- Transparency, ethics, accountability



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