ACER
European Union Agency for the Cooperation of Energy Regulators

PUBLIC

OPINION No 07/2025
OF THE EUROPEAN UNION AGENCY
FOR THE COOPERATION OF ENERGY REGULATORS

of 16 July 2025

ON THE ELECTRICITY NATIONAL DEVELOPMENT PLANS

THE EUROPEAN UNION AGENCY FOR THE COOPERATION OF ENERGY REGULATORS,

Having regard to Regulation (EU) 2019/943 of the European Parliament and of the Council of 5 June 2019 on the internal market for electricity, and, in particular, Article 48(2) thereof,

Having regard to the outcome of the consultation with ACER's Electricity Working Group,

Whereas:

EXECUTIVE SUMMARY

Stronger alignment between national and European electricity grid plans is essential for an effective energy transition.

(1) **Achieving Europe's climate and energy goals requires significant investment in electricity infrastructure.** Grid development must keep pace with the rapid growth of renewable energy, rising electricity demand, decentralised generation, and cross-border energy flows. Without effective planning, the energy transition risks delays, higher costs, and missing the benefits associated with timely and efficient grid development.

(2) **Network development plans are the main tool for identifying infrastructure needs and setting investment priorities.** National network development plans (NDPs) are prepared by transmission system operators (TSOs), while the European Network of Transmission System Operators for Electricity (ENTSO-E) develops the EU-wide Ten-Year Network Development Plan (EU TYNDP) for cross-border infrastructure needs. Misalignment in timing, methodology, or data between national and EU-level plans can cause investment delays, overlaps, or gaps. Greater consistency would enable better coordination and more efficient grid planning.

(3) **The European Union Agency for the Cooperation of Energy Regulators (ACER) investigated key planning elements of network development plans that are relevant for ensuring consistency**. The analysis is based on responses to a questionnaire submitted by National Regulatory Authorities (NRAs) from 26 Member States. This assessment identifies key areas for improvement and sets out recommendations to enhance consistency between network planning at national and EU level.

(4) ACER welcomes recent improvements in national planning practices**,** particularly in relation to enhanced NRA scrutiny, public consultation and increased consistency in the NDP frequency and in methodological aspects - such as greater scenario alignment - with the EU TYNDP. Planned improvements to the NDP process in several Member States reflect a continued commitment to improved coordination and alignment between the different network planning levels.

(5) **While progress has been made, ACER notes that national and European plans often lack sufficient alignment.** Better coordination of planning cycles would increase the usefulness of shared inputs, particularly regarding scenarios and cost-benefit analyses (CBA). Ensuring consistency in project inclusion and project information is critical for effective monitoring and informed decision-making. Strengthening the role of national regulatory authorities (NRAs), especially in terms of NDP oversight, consultation, and transparency, would further support a more coherent planning framework.

(6) To improve consistency between NDPs and the EU TYNDP, ACER recommends:

- Aligning national and European planning cycles on a biennial basis and improving time coordination between NDPs and the EU TYNDP processes—particularly for scenario building, needs identification, and CBA analysis—to ensure consistent input data[1];

- Strengthening cooperation between national transmission and distribution system operators to ensure robust planning, and timely and targeted development of infrastructure at national level;

- Strengthening NRAs' oversight and regulatory power over NDPs to ensure a sufficient level of quality;

- Ensuring that all NDPs are subject to public consultation, and, in more advanced national frameworks, that targeted consultations are held on key building blocks such as scenarios and needs assessments to improve the quality of NDPs and increase public acceptance;

- Requiring NDPs to publish investment cost information to enhance transparency;

- Allowing the inclusion of non-TSO projects in NDPs and ensuring their proper assessment by the NRA, to ensure that national plans provide a robust basis for project inclusion in the EU TYNDP.

(7) **Looking ahead, a more consistent planning framework at the national and European levels will be crucial** for the timely and cost-effective development of the electricity grid. ACER will continue collaborating with Member States, ENTSO-E, and the European Commission to support this goal.

[1] Improvements to the EU TYNDP process, particularly ensuring timely scenario development, are a prerequisite for this time coordination. ACER Opinion 04/2025 calls on ENTSO-E to assess the root causes of continued delays in the EU TYNDP development process.

1. INTRODUCTION

(8) The transformation of the energy system towards the 2050 climate objectives – guided by the European Green Deal and the Fit for 55 package - requires not only a rapid expansion of renewable energy sources, but also a resilient and future-ready electricity grid infrastructure. This grid must accommodate increasing renewable generation, rising electricity demand, decentralised energy production, and growing cross-border electricity flows. Timely and well-coordinated grid planning is therefore essential to ensure that infrastructure investments deliver maximum societal and economic benefits.

(9) Network development plans are the central planning tool for upgrading and expanding the electricity grid, aligning infrastructure with both current and future capacity needs. Network planning occurs at multiple levels: transmission network planning – national and EU-wide- and distribution network planning, which addresses local infrastructure development.

(10) At the cross-border level, the European Network of Transmission System Operators for Electricity (ENTSO-E) develops the EU Ten-Year Network Development Plan (EU TYNDP). At national level, transmission system operators (TSOs) prepare national grid development plans (NDPs), while distribution system operators (DSOs) are responsible for planning at low-to-medium voltage level.

(11) Misalignment in timing, methodology, or data between national and EU-level plans can cause investment delays, overlaps, or gaps. Greater consistency would enable better coordination and more efficient grid planning. The increased importance of alignment between national and EU wide plans has also been underlined in the Council's conclusions on the EU's electricity grid infrastructure[2].

(12) This Opinion aims to enhance the consistency between electricity NDPs and the EU TYNDP by offering a set of recommendations based on an evaluation of current practices in Member States (MS) and at the EU level.

(13) The assessment by the European Union Agency for the Cooperation of Energy Regulators (ACER) of the latest NDPs[3] is based on responses from 26 national regulatory authorities' (NRAs)[4] – referred to throughout this opinion as "all reporting Member States"

[2] See: https://www.consilium.europa.eu/en/press/press-releases/2024/05/30/sustainable-electricity-grids-council-approves-conclusions/

[3] For this opinion, ACER considers the latest available (draft or final) national ten-year NDPs pursuant to Article 48(2) of Regulation (EU) 2019/943, i.e. all relevant electricity network planning instruments, even if they are referred to with different title (e.g. investment plan) or cover a different time span.

[4] AT, BE, BG, CZ, DE, DK, EE, ES, FI, FR, GR, HR, HU, IE, IT, LT, LU, LV, MT, NL, PL, PT, RO, SE, SI and SK

[5] – to two questionnaires: one collecting views and information on the investments and projects included in ENTSO-E's draft EU TYNDP 2024[6] (submitted between 17 February and 31 March 2025), and another gathering insights into how NDPs are prepared in Member States (submitted between 7 March and 9 May 2025).

(14) This Opinion provides an assessment of the current state of electricity network development planning across the EU, focusing on four key areas: i) the alignment and coordination of NDPs with the EU TYNDP and other relevant plans; ii) the regulatory oversight and role of NRAs in the NDP process; iii) consistency of methodological aspects, specifically scenario development, needs assessment, and project selection; iv) consistency of project inclusion and information between NDPs and the EU TYNDP. Detailed information supporting the findings is included in the Annex.

2. ACER'S ASSESSMENT

2.1. Alignment and coordination of NDPs with the EU TYNDP and other relevant plans

(15) NDPs are developed independently from the EU TYNDP in each Member State except Malta where there is no TSO. Apart from Austria, all reporting Member States produce a single, unified NDP[7]. ACER welcomes that all NDPs are publicly available.[8] For more details, Table 1 and Table 2 of the Annex provide links and information on the latest available NDPs.

(16) Regular updates to network planning and its inputs are critical for addressing grid investment needs effectively. While the EU TYNDP follows a biennial cycle[9], in some Member States, the frequency of elaboration of the NDPs is lower. ACER welcomes the recent transition of Poland's NDP from a triennial to a biennial publication cycle[10] and recommends that in Belgium (every four years) and Spain (every six years), the application of a biennial frequency is also considered.

[5] The term "all reporting Member States" is used interchangeably with "all reporting NRAs" throughout this Opinion, excluding Malta, unless stated otherwise, as Malta does not have an NDP.
[6] Based on ENTSO-E's EU TYNDP 2024 Projects Sheets that were subject of the public consultation conducted by ENTSO-E from January 31 to March 2025 under the following link: https://tyndp.entsoe.eu/european-projects
[7] In Austria, each of the two TSOs currently prepares its own NDP. TUEN was certified as a new TSO in Austria in 2024. In Germany, the four TSOs develop a joint NDP.
[8] In contrast to 2021, both Luxembourg and Cyprus have now also published their NDPs.
[9] Pursuant to Regulation (EU) 2019/943, Article 30(1b)
[10] The update of the Energy Law Act (Art. 16.2) imposes on the TSO the obligation to update the NDP every two years.

(17) ACER observes that Member States which prepare NDPs annually encounter relatively more challenges related to delays during the planning process[11]. ACER concludes that an annual planning frequency may introduce procedural and administrative complexities. Accordingly, ACER recommends that these Member States reassess the suitability of annual planning and consider adopting a biennial cycle. A biennial publication cycle would not only ensure an adequate update of the NDP but also reduce procedural burdens and allow adequate time for stakeholder consultations.

(18) Time alignment of national and EU-level planning is critical for effective infrastructure development. NDPs often make use of ENTSO's scenario building, cost-benefit analysis (CBA), and other input from the EU TYNDP development process. A lack of time alignment between the national and EU-level increases the risk of outdated data being used, potentially undermining the effectiveness of development planning. The varying publication dates of NDPs and the EU TYNDP, as illustrated in Figure 1 in the Annex, indicate a lack of synchronisation between the national and EU planning cycles. ACER emphasises the benefits of time coordination in the preparation of the NDPs and the EU TYNDP, especially regarding the major building blocks (e.g. scenario building, needs identification, CBA analysis). Improvements to the EU TYNDP process, particularly in ensuring timely scenario development, as highlighted in ACER Opinion 04/2025[12], are a prerequisite for achieving this time alignment.

(19) The development of electricity infrastructure is closely linked to other energy sectors, such as fossil gas and hydrogen. As energy systems evolve and become more interconnected, it is increasingly important that network planning takes these sectors into account. As highlighted in the joint ACER and CEER[13] position paper on the challenges of the future electricity[14], electricity transmission infrastructure development should move towards a multi-sectoral planning at EU level and preferably also at national level. The EU TYNDP already develops joint scenarios for electricity and gas[15], fostering a more integrated approach to infrastructure planning. At the national level, only Belgium, Czech Republic, Germany, Italy, the Netherlands and Spain have implemented joint scenario development for electricity and gas. ACER emphasises the growing importance for

[11] These delays relate to longer than expected preparation by the TSO, approval of the plan or delays for other reasons. For more details, see Table 3 and 4 of the Annex.
[12] See ACER Opinion 04/2025 on ENTSO-E's draft TYNDP 2024 and on ENTSO-E's draft Infrastructure Gaps Report 2024: https://www.acer.europa.eu/sites/default/files/documents/Official_documents/Acts_of_the_Agency/Opinions/Opinions/ACER-Opinion-04-2025-ENTSO-E-TYNDP-2024-and-Infrastructure-Gaps-report-2024.pdf
[13] Council of European Energy Regulators
[14] See: https://www.ceer.eu/wp-content/uploads/2024/07/Future_electricity_system_challenges_2024.pdf
[15] And in the future hydrogen.

electricity grid planning to shift from a single sector to an integrated, multi-sectoral approach[16].

(20) As decentralised renewable energy sources and electrification of energy demand grow, the coordination between TSOs and DSOs becomes increasingly important. Effective coordination and exchange of identified needs and planned investments is essential, ensuring that infrastructure developments at both levels are well-coordinated. Hungary is the only Member State that develops a single, unified NDP covering the distribution and transmission level. ACER acknowledges improvements in the coordination and alignment of transmission and distribution network planning processes in several Member States, particularly through enhanced cooperation in joint scenario development, data exchange, and collaborative assessments of infrastructure needs and encourages Member states to continue this trend. Table 5 of the Annex presents an overview of the alignment between transmission and distribution levels. Enhanced cooperation and data exchange will help identify gaps, optimise investments, and ensure the timely and efficient development of electricity infrastructure at all levels.

2.2. Regulatory oversight and role of NRAs in the NDP development process

(21) While ENTSO-E and TSOs carry out the network development planning, effective regulatory oversight is essential to ensure that electricity transmission is developed transparently and in a way that enhances quality and mitigates potential biases. A robust oversight framework helps guarantee that the infrastructure planning serves the best interests of society and meet the evolving needs of the electricity system.

(22) At the European level, ACER plays a key role in assessing EU TYNDP's contribution to market transparency and ensuring that it fosters effective competition[17]. ACER also recommends amendments when inconsistencies between EU TYNDP and NDPs are identified, as done in this Opinion, and monitors EU TYNDP's implementation. At the national level, the level of scrutiny exercised by NRAs and other stakeholders varies across Member States and their national legislations. This scrutiny can be reflected in the power to approve the NDP, request its amendment or to issue an act (e.g. opinion, recommendation), through consultations or via monitoring of the implementation of the NDPs. The scrutiny powers of NRAs are stipulated in Article 51 of Directive (EU) 2019/944 and currently only apply for the case of Independent Transmission Operators (ITOs).

Approval and amendment powers

[16] At present, the EU TYNDP for electricity and all NDPs are sector-specific, i.e. neither the EU TYNDP nor any NDP is jointly prepared by multiple sectors (e.g. electricity and gas).
[17] See ACER Opinion 04/2025 on ENTSO-E's draft TYNDP 2024 and on ENTSO-E's draft Infrastructure Gaps Report 2024.

(23) In all reporting Member States except for Belgium, Finland and Sweden[18], the NRA approves or can request amendments to the NDP. For example, the Croatian NRA did not approve the last two draft NDPs in January 2024 and December 2024 due to insufficient information regarding the financing of required network upgrades for connecting new renewable energy sources (RES). Similarly, the German and Italian NRAs rejected certain projects due to a lack of sufficient benefits and economic sufficiency. In Greece, two electricity storage projects were not approved by the NRA in the past two NDP processes. This level of oversight ensures that NDPs meet the necessary requirements for effective infrastructure development.

Consultation of NDPs

(24) The involvement of different stakeholders – such as industry experts, local communities, and environmental groups – during the planning process is crucial for improving the quality of NDPs and increasing public acceptance. At the European level, ENTSO-E conducts public consultations on key elements such as scenario building, CBA, and project inclusion. Similarly, most reporting Member States, with the exception of Slovenia, and Sweden, conduct public consultations on the NDP[19]. Several Member States, including Belgium, Germany, Hungary, Italy, and Luxembourg and the Netherlands, also carry out specific consultations on major NDP building blocks, particularly scenario building. In addition, bilateral consultations are held in most Member States, to ensure coordination between TSOs with relevant stakeholders such as NRAs, DSOs, the national Ministry and foreign stakeholders.

(25) ACER welcomes the increased involvement of stakeholders in the NDP process and the enhanced role of NRAs. ACER reaffirms its previous recommendation that public consultation on the draft NDP should be carried out in every country. These consultations should occur prior to the adoption of the NDP to allow stakeholders' inputs to be considered in a timely manner. In more advanced national frameworks, specific consultations on the major building blocks of the NDPs (such as scenario building and CBA) could be considered.

Examination of investment needs

(26) Regulatory oversight includes examining investment needs, ensuring that the proposed NDPs covers all investment needs identified during the consultation process. In the absence of proper regulatory scrutiny, specific market failures could induce TSOs not to consider specific investments that would bring greater social welfare in the long-run or result in inefficient investments whose costs would be borne by consumers.

[18] In Sweden there is no NRA scrutiny, while Belgium and Finland have limited power by issuing non-binding acts such as opinions or recommendations.
[19] These public consultations are typically carried out by the NRA.

(27) ACER welcomes that the examination of investment needs is carried out in all but two reporting Member States[20]. As an example, the Slovakian NRA identified that a prior draft version of the NDP did not cover all investment needs during the consultation process after which the TSO amended the draft NDP[21]. ACER emphasizes the importance of assessing the identified investment needs and calls on Member States to carry out this task with due diligence.

Examination of consistency with EU TYNDP

(28) NRAs carry out a consistency check already in the framework of ACER's activity pursuant to Article 48(2) of Regulation (EU) 2019/943. Most reporting NRAs also indicate that they conduct further consistency checks between their NDPs and the EU TYNDP, which mostly focus on the consistency of inputs (e.g. national inputs to scenarios) and the consistency of outputs (e.g. list of investments, expected commissioning date, costs and benefits). ACER observes that none of the consistency checks of the latest NDPs resulted in any actions by the reporting NRAs, as no inconsistencies were identified, or those identified were deemed acceptable due to the differing development cycles of the respective NDP and the EU TYNDP.

Examination of consistency with the NECPs

(29) The National Energy and Climate Plan (NECP) is a key instrument through which Member States outline their 10-year strategies for achieving shared energy and climate goals. Ensuring that the NDPs are consistent with the NECPs is crucial for aligning national efforts with EU-wide objectives and ensuring a coherent and effective energy transition. ACER welcomes that in most reporting Member States, an examination of the consistency with NECPs is carried out with the involvement of the NRA.

Monitoring of NDP implementation

(30) Monitoring of NDP implementation is essential to ensure that projects are completed timely and efficiently. ACER welcomes that all reporting NRAs, except for the Swedish NRA, are empowered to monitor the progress of NDP investments. ACER recommends that, in addition to the biennial update of NDPs, Member States should conduct annual monitoring updates to track the progress of planned investments and identify any delays or cancelled investments. These updates should also evaluate the reasons behind any delays.

[20] Member States that do not perform this activity include Belgium and Sweden.
[21] In addition, the Irish NRA also identified that the NDP does not cover all investment needs. However, the NRA did not require the TSO to amend the NDP, as further improvements to address investment needs are expected to be addressed in subsequent NDPs.

(31) ACER highlights the importance of strong regulatory oversight in the network development planning process and welcomes the growing involvement of NRAs in the NDP process. For example, the Luxembourgish NRA has received scrutiny powers over the very high voltage network development plan[22], while the NRAs from Greece, Ireland, Italy and Slovenia received the authority to assess consistency of the NDP with the NECP – a power they did not hold in ACER's previous NDP assessment. An overview of the different roles and powers of NRAs and other stakeholders during the NDP process is presented in Section 2 of the Annex.

(32) ACER recommends that Member States which have not yet done so – such as Sweden, where the role of the NRA remains comparatively limited – grant NRAs formal approval power over the NDP, and responsibilities outlined in this chapter and pursuant to Directive (EU) 2019/944, Article 51, regardless of the unbundling model applied.

2.3. Consistency of methodological aspects: scenarios, needs assessment, project identification

(33) Electricity grid planning typically involves three essential components: the development of scenarios to model future conditions, a needs identification to determine where and when additional capacity is required, and the identification and selection of projects to meet these needs. For effective and coherent electricity system planning across Europe, it is essential that these planning steps are approached consistently across the EU TYNDP and NDPs.

Scenarios

(34) The EU TYNDP develops joint electricity and gas scenarios that are aligned with EU climate and energy objectives and follow ACER's framework guidelines[23]. At the national level, there is no harmonised methodology approach for developing scenarios.

(35) As mentioned, only a limited number of all reporting Member States (e.g. Belgium, Czech Republic, Germany, Italy, the Netherlands and Spain) develop joint scenarios for gas and electricity infrastructure at national level. All reporting Member States except Croatia either use the EU TYNDP scenarios directly or take them into account alongside their own national scenarios.

(36) ACER acknowledges that most national scenarios are aligned with the latest NECPs and, in about half of the cases, with the Fit-for-55 framework for achieving climate neutrality. ACER emphasizes the importance of ensuring that NDPs and the EU TYNDP are based on compatible scenarios that align with national and European decarbonisation

[22] 220 kV and above
[23] See: https://www.acer.europa.eu/sites/default/files/documents/Official_documents/Acts_of_the_Agency/Framework_Guidelines/Framework%20Guidelines/FG_For_Joint_TYNDP_Scenarios.pdf

targets. Moreover, the development of joint gas and electricity scenarios is instrumental for creating robust and consistent planning frameworks for efficient network planning.

Identification of infrastructure gaps

(37) In the EU TYNDP, ENTSO-E uses an optimisation methodology based on its scenarios to identify where and how much cross-border capacity is needed. At national level, approaches vary widely. In around half of the reporting Member States, a formal infrastructure needs identification study is conducted by the TSO and projects are proposed taking into account also the results of such study. In eight reporting Member States[24], the TSO does not conduct a formal needs identification process.

(38) ACER encourages Member States and ENTSOs to adopt and foster a multi-sectoral planning approach, including a multi-sectoral needs assessment that integrates other energy sectors such as fossil gas and hydrogen, as highlighted in the joint ACER and CEER position paper on the challenges of the future electricity.

Project identification

(39) At EU level, project promoters submit transmission projects with cross-border relevance for inclusion in the EU TYNDP. ENTSO-E assesses these projects using a common CBA methodology. At national level, the approach to project identification and assessment is not harmonized throughout the EU.

(40) In the NDPs of most reporting Member States, a Cost-Benefit Analysis (CBA) is used as part of the project assessment process. However, the application of CBA varies significantly between Member States. In Belgium, France, Germany and Estonia, CBAs are conducted only for cross-border projects while several countries, such as Ireland and Italy, carry out a CBA only for major infrastructure projects. The Finnish TSO conducts internal CBA for projects, but it is not presented in the NDP. The link between CBA outcomes and project inclusion also differs. In Czech Republic, a project must demonstrate a positive CBA outcome across all scenarios in order to be included in the NDP. In Latvia, a positive result in most scenarios is required, while in Hungary, Poland and Slovenia, a positive outcome in at least one scenario is sufficient. In some Member States, a positive CBA is not a prerequisite for project inclusion.

(41) ACER recommends that project identification be based on clearly defined system needs and supported by quantitatively assessed project benefits. Grid developers should follow the “efficiency first” principle, ensuring that projects selected offer the greatest societal value and system benefit.

[24] BE, CZ, DE, HU, PL, RO, SE and SK

(42) Section 3 of the Annex provides detailed information on the methodologies used in NDPs for scenario building, infrastructure gap identification, and project assessment.

2.4. Consistency of project inclusion and information in NDPs and the EU TYNDP

(43) While the EU TYNDP follows a bottom-up approach, i.e. the EU TYNDP collects projects from TSOs and third-party promoters, NDPs generally present projects as solutions to identified system needs. In most reporting Member States, the implementation of projects included in the NDPs is indicative, with binding status typically limited to specific projects or those nearing commissioning. All projects included in the NDPs of Austria, Bulgaria, Czech Republic, Latvia, the Netherlands and Poland are binding.

Consistency of project inclusion in NDPs and EU TYNDP

(44) Consistency in project inclusion across NDPs and the EU TYNDP is essential for enabling a comprehensive monitoring of network development. Inconsistencies between the two levels can create an unclear picture of network development, which may raise uncertainty for decision-makers.

(45) ACER observes that 80% of the 349[25] national parts of transmission investments and 38% of the 32 storage projects in the draft EU TYNDP 2024 that were assessed by NRAs are also included in the corresponding NDP(s). The inclusion rate of EU TYNDP projects in the relevant NDP(s) remains unchanged compared to ACER's assessment of electricity projects in the NDPs and EU TYNDP 2022[26]. The main reason for missing transmission projects is misalignment in the timing between both plans – many NDPs were developed before the draft EU TYNDP, and the missing projects are expected to be included in the upcoming national plans. Further details on the inclusion of draft EU TYNDP 2024 projects in the respective NDPs and the reasons for their absence can be found in Tables 38-41 of the Annex. ACER reiterates the importance of time alignment of national and EU-level planning to support effective infrastructure development. The limited inclusion of EU TYNDP 2024 storage projects in the NDPs is due to the fact that most reporting Member States do not include storage projects in their NDP(s).[27]

(46) NRAs reported on two cross-border relevant investments that are included in the relevant NDP(s), but do not appear in the draft EU TYNDP 2024, as presented in ACER Opinion 04/2025, p 46. on ENTSO-E's draft EU TYNDP 2024. ACER notes that under the current EU TYNDP process, the inclusion of cross-border relevant projects in the EU

[25] 364 out of 378 national parts of investment items were assessed, excluding those from CY and DK. Due to the absence of a TSO in Malta, references were made to the DSO NDP and the most recent NECP.
[26] See: https://acer.europa.eu/sites/default/files/documents/Official_documents/Acts_of_the_Agency/Opinions/Opinions/ACER_Opinion_04-2023-Ele_projects_ENTSO-E_draft_TYNDP_2022%26NDPs.pdf
[27] In several cases, storage projects that received the status of a project of common interest (PCI) are included in the respective NDPs.

TYNDP solely depends on project promoters' (PP) voluntary application, with a risk to bypass the EU-level scrutiny of projects, if the PP does not apply for inclusion in the EU TYNDP. ACER stresses that all planned projects with cross-border relevance from the NDPs should be included in the EU TYNDP.

(47) Unlike the EU TYNDP, NDPs of the Czech Republic, Finland, Hungary, Lithuania, the Netherlands and Slovakia do not allow the inclusion of non-TSO projects. ACER reiterates its view that NDPs can only provide a proper basis for the EU TYNDP regarding the inclusion of projects if non-TSO projects are allowed to enter the NDP. It recommends that the scope of NDPs is extended allowing the inclusion of such projects. In this regard, project promoters should provide the necessary information to the TSO(s) in charge of developing the relevant NDPs, as well as to the relevant NRAs.

Consistency of relevant project information

(48) Beyond aligning project inclusion across NDPs and EU TYNDP, ensuring accuracy and coherence of underlying project information is equally critical. Updated and consistent project information – especially regarding fundamental project information - is essential for enabling informed decisions and coordinated grid development. Inconsistencies in project data can distort the overall picture of network development and compromise the reliability of both national and EU-level planning efforts.

(49) As stated in ACER Opinion 04/2025, NRAs identified several inconsistencies when comparing the data provided by the EU TYNDP 2024 projects sheets[28] with the information provided in the latest available NDP (or the latest available information to the NRA). Only some of the data inconsistencies are explained by the different network development planning cycles. ACER calls on project promoters to ensure that coherent and reliable project information is provided in NDPs, in the EU TYNDP, and during the project implementation monitoring.

(50) ACER notes that investment cost information in the NDPs is rather limited and that the transparency of this information has barely improved compared to previous years[29]. Based on the information provided, investment costs of all or most investments are available to the public only in the NDPs of five Member States, i.e. Bulgaria, Latvia, Luxembourg, Slovakia and Spain. For the remaining Member States, investment costs are only available

[28] See: https://tyndp.entsoe.eu/european-projects

[29] As already stressed in its Opinion No 13/2019 and No 05/2021, ACER identified that in general, investment cost information in the NDPs is rather limited.

to a limited extend.[30] Furthermore, ACER observes that around 30% of the reporting Member States do not publish information whether projects have cross-border relevance

(51) ACER reiterates its recommendation that NDPs should include investment cost information, as cost information is essential for evaluating investment proposals. In ACER's view public availability of investment cost information improves transparency and enables efficient infrastructure planning and implementation in Europe. Furthermore, ACER stresses that for transparency and for ENTSO-E to effectively include all cross-border and cross-zonal relevant planned projects from the NDPs in the EU TYNDP, these projects should be clearly flagged in the NDP, indicating the relevant cross-border or cross-zonal capacity increase.

HAS ADOPTED THIS OPINION:

a) ACER considers that inputs and analytical methodologies of the NDPs reviewed in this Opinion are broadly consistent with the EU TYNDP.

b) ACER welcomes the improvements introduced in various Member States with regard to NRA scrutiny, public consultation and greater consistency in the NDP frequency and in methodological aspects – such as greater scenario alignment - compared to its previous assessment. Furthermore, ACER welcomes the planned improvements to the upcoming NDPs reported by several Member States, as listed in Table 48 of the Annex.

c) To increase the consistency of NDPs with the EU TYNDP and to improve their robustness, credibility and transparency, ACER recommends that the entities

[30] In Italy investment costs are available at a project level, in Belgium some investment costs are publicly available, while in Croatia, Estonia, Hungary, Ireland, Poland and Romania this information is available only to the NRA

responsible for developing, reviewing, and adopting the NDPs consider the following measures and pursue their implementation to the extent that it is within their powers:

a. NDPs should be prepared on a biennial basis, with improved time coordination with the EU TYNDP processes[31]—particularly in scenario building, needs identification, and CBA analysis.

b. Enhanced cooperation and data exchange between TSOs and DSOs throughout the NDP development process.

c. NDPs should be subject to strengthened NRAs' oversight and regulatory powers in those MS where, so far, this oversight has been limited. In particular, NRAs should be granted formal approval power over the NDP.

d. Public consultation on the draft NDP before its adoption should be carried out in every Member State. In more advanced national frameworks, specific consultations on the major building blocks of the NDPs (e.g. scenarios, infrastructure gaps identification, CBA) could be considered.

e. Information on the investment costs should be published in the NDPs.

f. Non-TSO projects should be allowed to enter the NDP, and they should be subject to a proper assessment by the NRA. In this regard, project promoters should provide the necessary information to the TSO(s) in charge of developing the relevant NDP(s), as well as to the relevant NRA(s).

g. ACER underlines that additional recommendations listed in its Opinion No 05/2021 on the national electricity NDPs and their consistency with the EU TYNDP (pp. 20-21) which are not reiterated in this Opinion, remain valid.

This Opinion is addressed to ENTSO-E, the Commission and Member States.

Done at Ljubljana, on 16 July 2025.

- SIGNED -

For the Agency
The Director
C.ZINGLERSEN

[31] As mentioned, improvements to the EU TYNDP process, particularly ensuring timely scenario development, are a prerequisite for achieving this time alignment.