

# REPORT OF THE PUBLIC CONSULTATION ON THE THIRD LIST OF PROJECTS OF COMMON INTEREST

## 1 Summary

This report presents the results of the public consultation on the projects submitted for consideration in view of the third list of Projects of Common Interest (PCI). The consultation sought views on the candidate energy infrastructure projects, in terms of their contribution towards the objectives of a fully-integrated EU internal energy market: security of supply, competition, sustainability and ending the isolation of Member States from Europe-wide energy networks.

Three rounds of online consultations took place.

The first consultation (27 March - 19 June 2017) assessed 328 electricity and gas projects across eight priority corridors - the number assessed per corridor were as below:

Electricity		Gas	
NSOG	68 projects	NSI West	26 projects
NSI West	50 projects	NSI East	70 projects
NSI East	58 projects	SCG	17 projects
BEMIP	19 projects	BEMIP	20 projects

The second (3 April - 26 June 2017) assessed oil and smart grid projects, and a third consultation on CO<sub>2</sub> transport infrastructure projects is ongoing.

## 2 Process

Guidelines on transparency and public participation in the PCI selection process are outlined in the TEN-E Regulation, which details the responsibility of the Regional Groups that work on PCI's: *"Each Group shall consult the organisations representing relevant stakeholders — and, if deemed appropriate, stakeholders directly — including producers, distribution system operators, suppliers, consumers, and organisations for environmental protection. The Group may organise hearings or consultations, where relevant for the accomplishments of its tasks."*

The consultations have been launched on a page on the DG ENER website, which links to the questionnaires on the EU Survey website where contributions from stakeholders are submitted. The webpage also includes links to project information on Ministry and/or project promoter websites (in the national languages), and on the ENTSO-E and ENTSO-G websites. Information

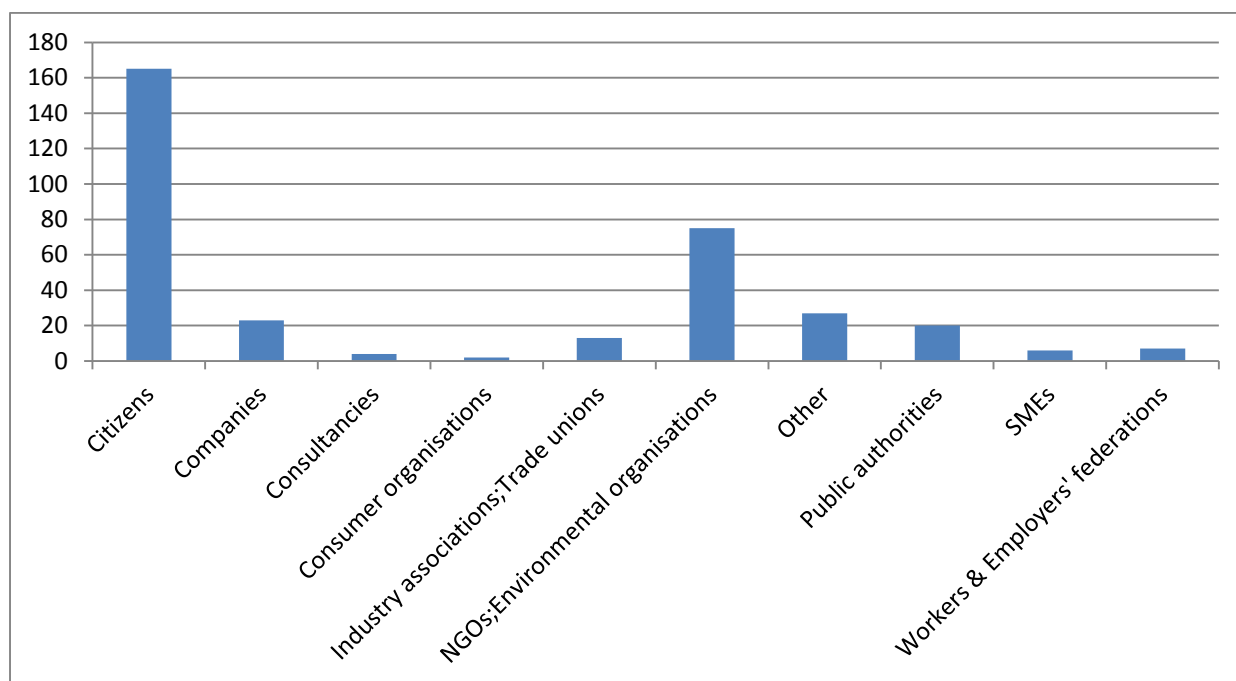
about the consultation was also communicated to stakeholders via websites of the respective national Ministries, as well as an announcement on the 'Consultations' section of the main European Commission (Europa) website.

Given that participation in the public consultation is voluntary, the views expressed by respondents are their own and do not necessarily represent any other stakeholder's views.

### 3 Stakeholder coverage

Overall, 342 questionnaires from 23 Member States were submitted via the EU Survey platform. In total, 165 citizens, 75 NGOs and environmental organisations, 23 companies, 20 public authorities, 13 industry associations/trade unions, 7 workers & employers' federations, 6 SMEs, 4 consultancies, 2 consumer organisations and 27 other entities contributed their views to the consultation for all the projects.

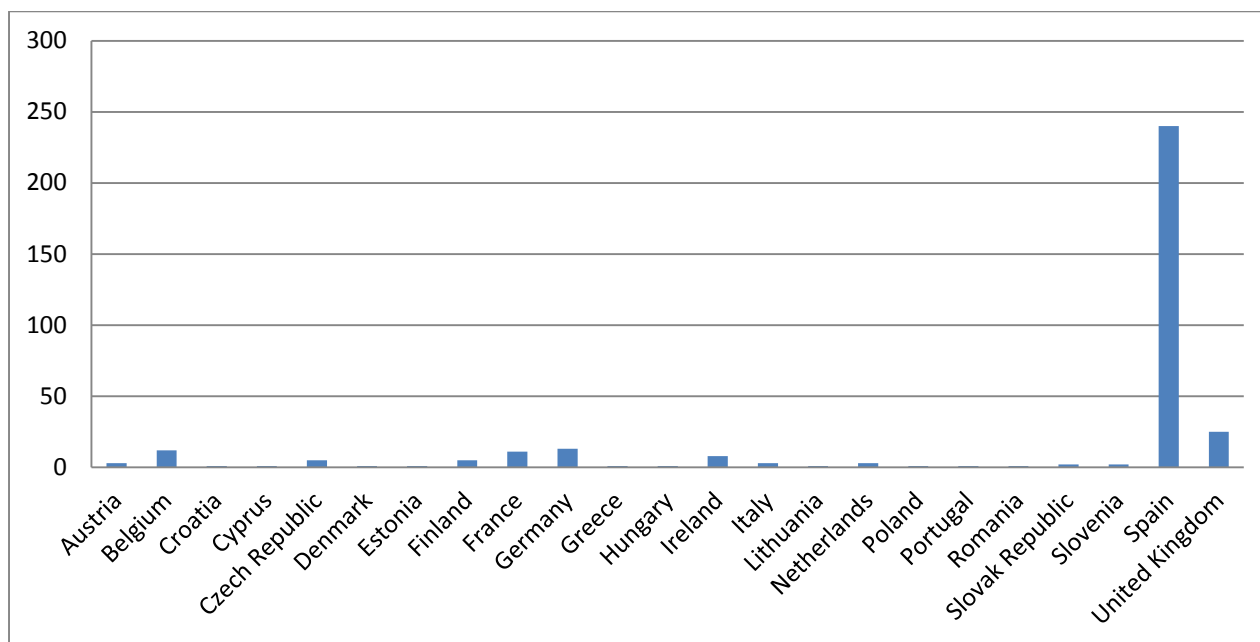
**Stakeholders by type of organisation**



There were also 92 additional responses submitted through email, most of which had attached the relevant surveys and some were accompanied by position papers. The relevant comments are mentioned in the analysis of the feedback received for each project group that follows in the next sections of the report.

By country, the largest number of participants were from Spain (240), followed by the United Kingdom (25) and Germany (13), with a total of 23 nationalities participating in the consultation.

### Number of submitted questionnaires by country



## 4 Consultation Results

The public consultation asked the following closed question:

*"In your opinion, is a proposed project significantly contributing to market integration/sustainability/security of supply/competition and therefore needed from an EU energy policy perspective?"*

For each investment item in the questionnaire, participants could answer either "yes" or "no" and then provide their comments. Frequently, respondents only provided a "yes" or "no" answer without giving an argument for their choice. The charts shown below reflect the overall output including the answers without comments and thus the picture of the results is only partially reinforced through justified answers. This report **only** details the main comments received on projects in each priority corridor.

As a general conclusion, the number of negative comments submitted for each of the gas and electricity corridors exceeded the number of positive ones.

## **4.1 General comments**

Apart from the 342 forms received through the EU Survey platform, 92 additional submissions were made via email. Some stakeholders submitted very comprehensive position papers expressing their views on general climate issues but also on specific projects. Where appropriate these comments are mentioned in the relevant sections of the report.

Three organisations – Friends of the Earth Europe, Food and Water Europe and Justice & Environment – submitted position papers for each gas corridor. The basis of their argumentation is that with a high energy efficiency potential in most of the EU countries and the urgent need to phase out the use of fossil fuels, there is a high possibility of further decreasing gas demand in the region. New gas infrastructures therefore not only contradict EU climate objectives (given that gas is a fossil fuel emitting important volumes of methane), but also seriously risk to become quickly stranded.

Birdlife Europe also sent a separate document providing additional feedback on specific electricity projects highlighting the environmental impact of those projects. There were also supporting documents sent for individual projects that were also taken into consideration and referred to in some of the comments provided for the projects below.

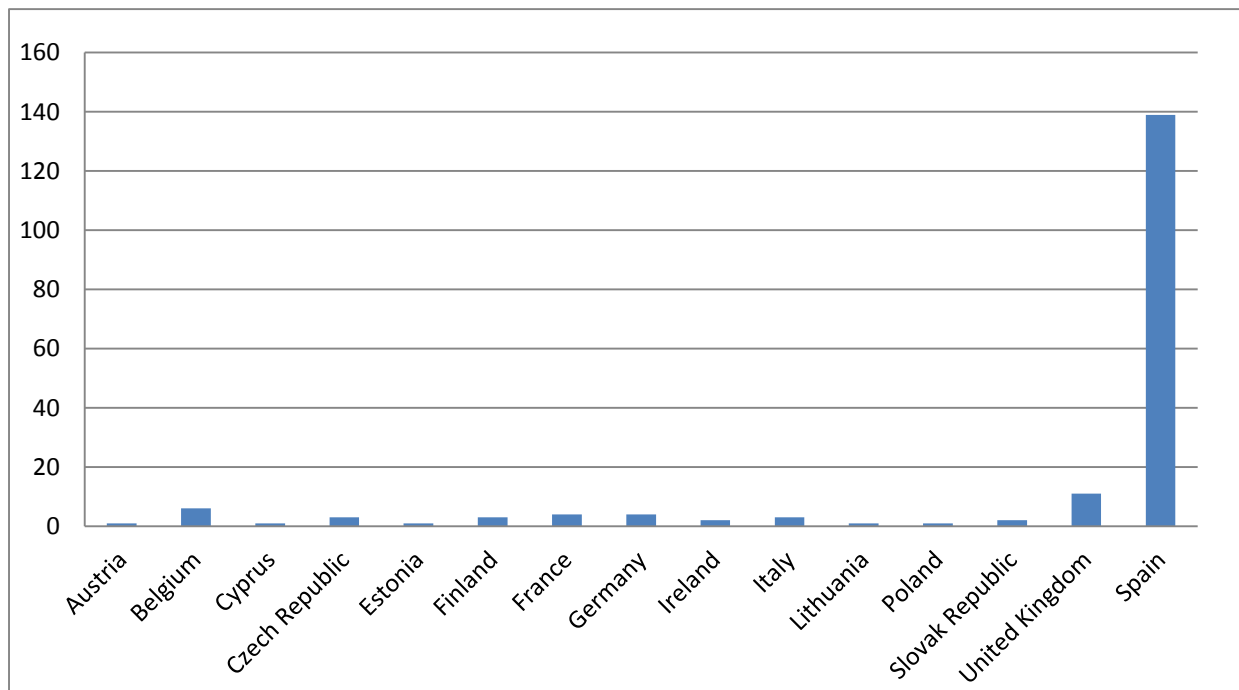
## 4.2 Electricity corridors (public consultation conducted between 27 March - 19 June 2017)

### 4.2.1 General information for all 4 electricity corridors

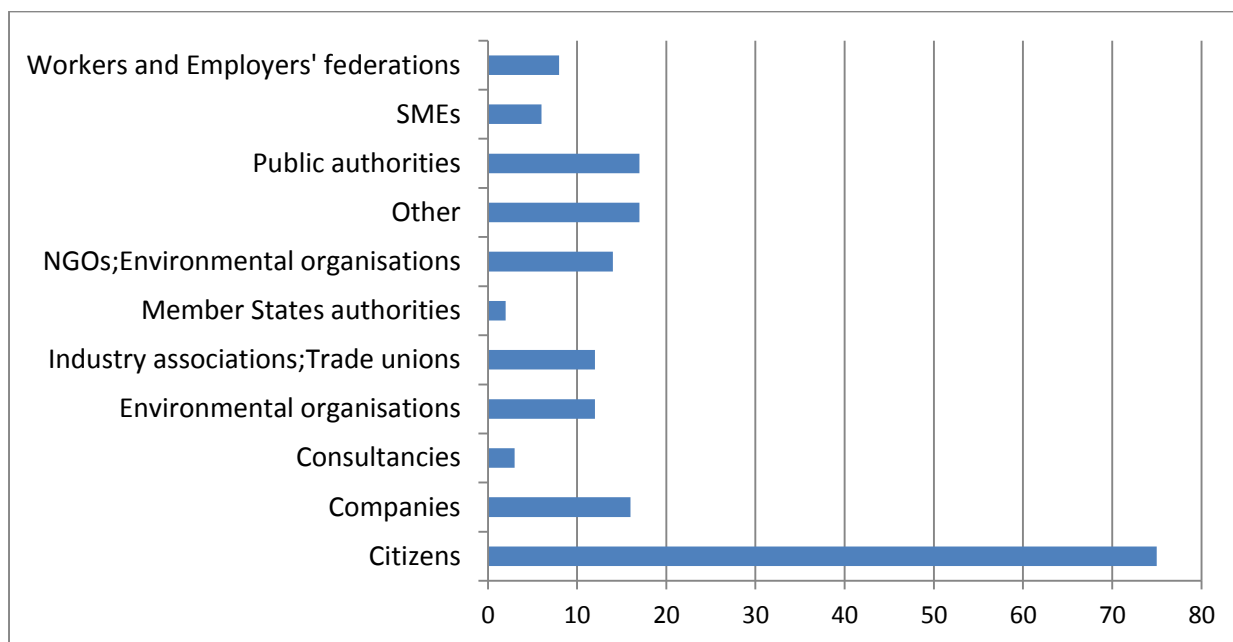
#### Overview of responses and type of stakeholders

182 valid responses were received originating in 15 Member States.

**Number of submitted questionnaires by country**



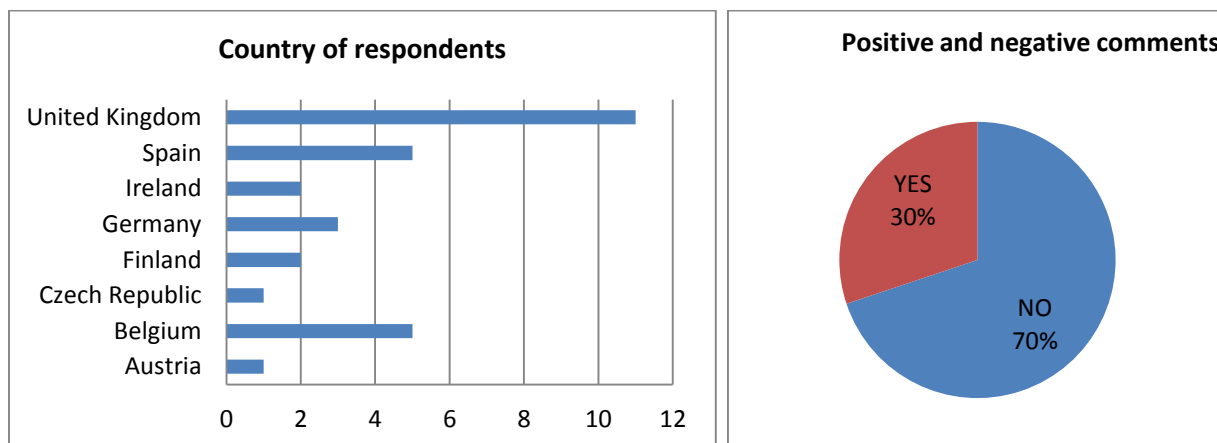
### Stakeholders by type of organisation

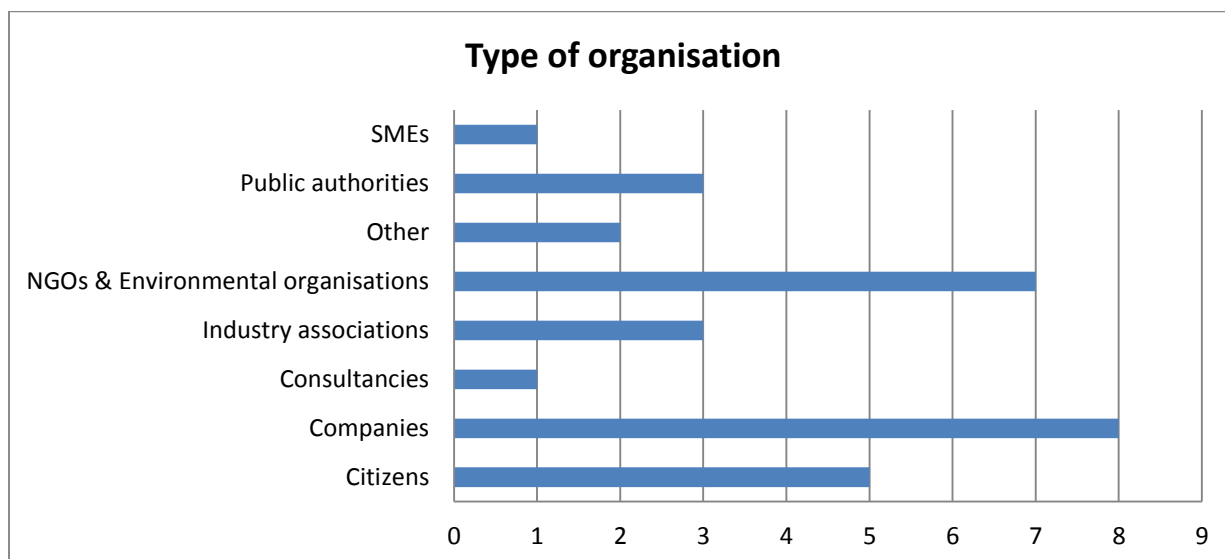


## 4.2.2 North Sea Offshore Grid

### Overview of responses and types of stakeholders in the NSOG priority corridor

30 valid responses were received originating in 8 Member States.





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### **Overview of main comments to specific projects:**

#### ***Maali***

This project received many positive comments (62.5%); the negative feedback received was not provided with explanation.

One positive remark was the fact that it would significantly contribute to market integration, sustainability and security of supply. Other respondents mentioned that Maali would reduce electricity costs for consumers, deliver and provide a means to export surplus wind power as well as increase decarbonisation of energy supplies and economic welfare in all these localities. It was also emphasised that connecting to Shetland will allow that remote island community to contribute to the production of clean energy and diversify their sources of income.

#### ***iLand***

This project raised concerns mainly about the environmental impact.

Environmental organizations such as Bond Beter Leefmilieu, Greenpeace, WWF and Nature Point questioned the necessity of developing such a project and highlighted that the effects on the environment and wave action have not been sufficiently investigated. .

#### ***Irish Scottish Links on Energy Study (ISLES)***

Although there were a few objections mostly made in relation to maturity of the project, one respondent argued in favour of this cluster of projects, highlighting the importance of interconnection for Ireland. It was also argued that increasing the use of Ireland's low-cost onshore wind resource would also reduce electricity costs, increase the use of sustainable resources, and improve market integration.

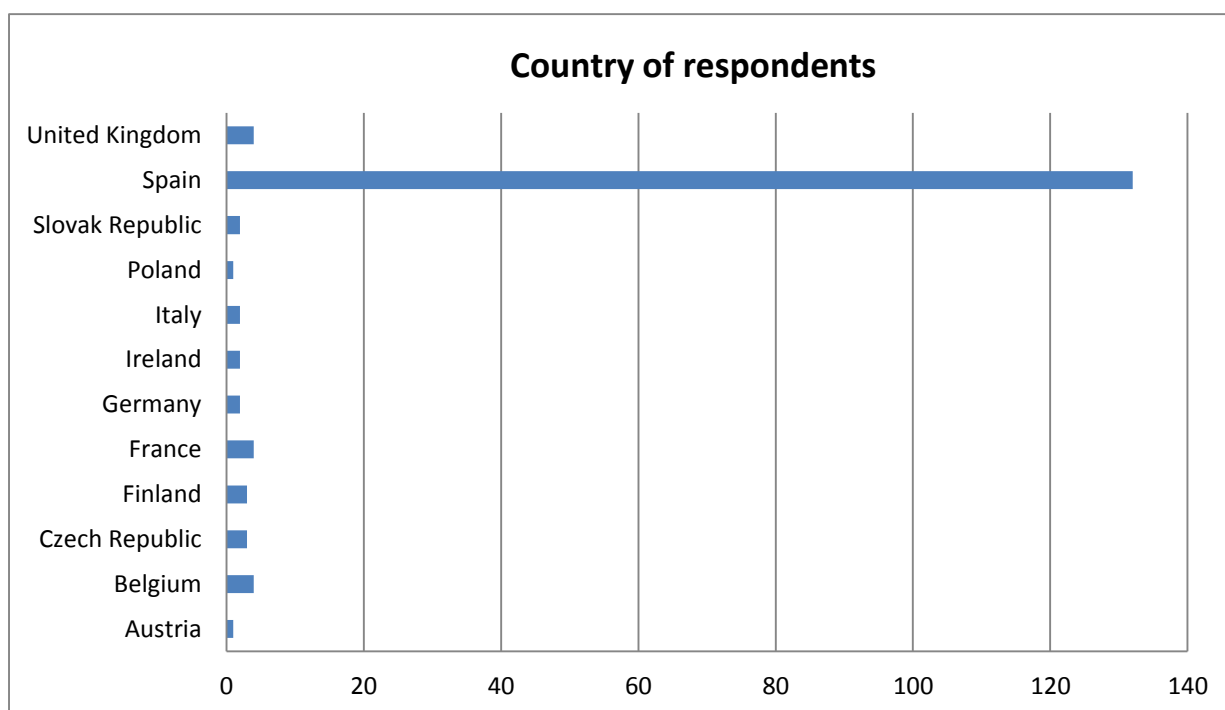
### ***Celtic Interconnector***

This project was questioned by the citizens' community in the region on the basis that Ireland has no projected huge increase in demand and thus the project could put a heavy burden on consumers. They advise a "wait and see" approach, and consider that maybe the next PCI's lists would be more appropriate for this project.

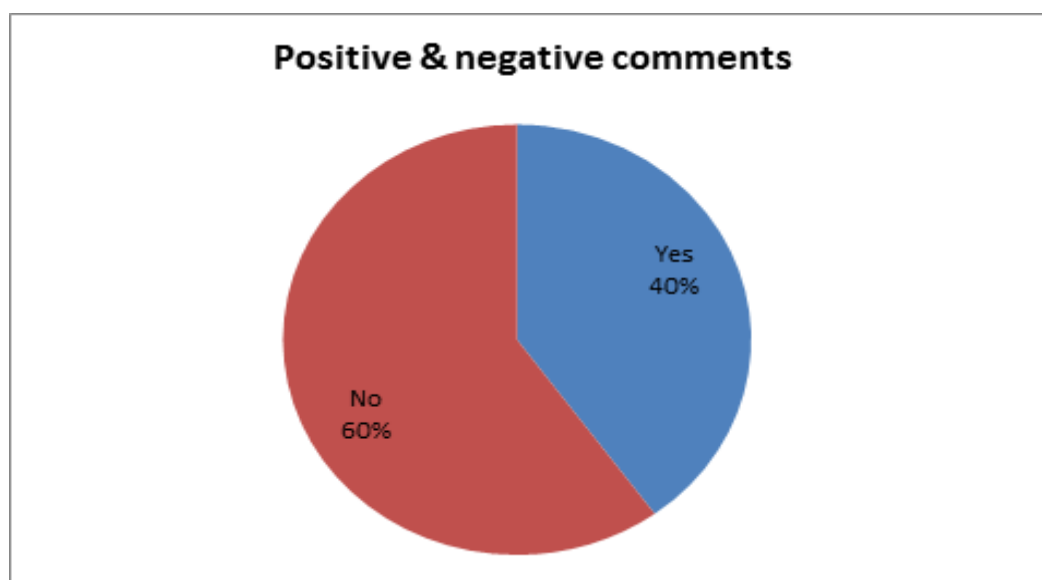
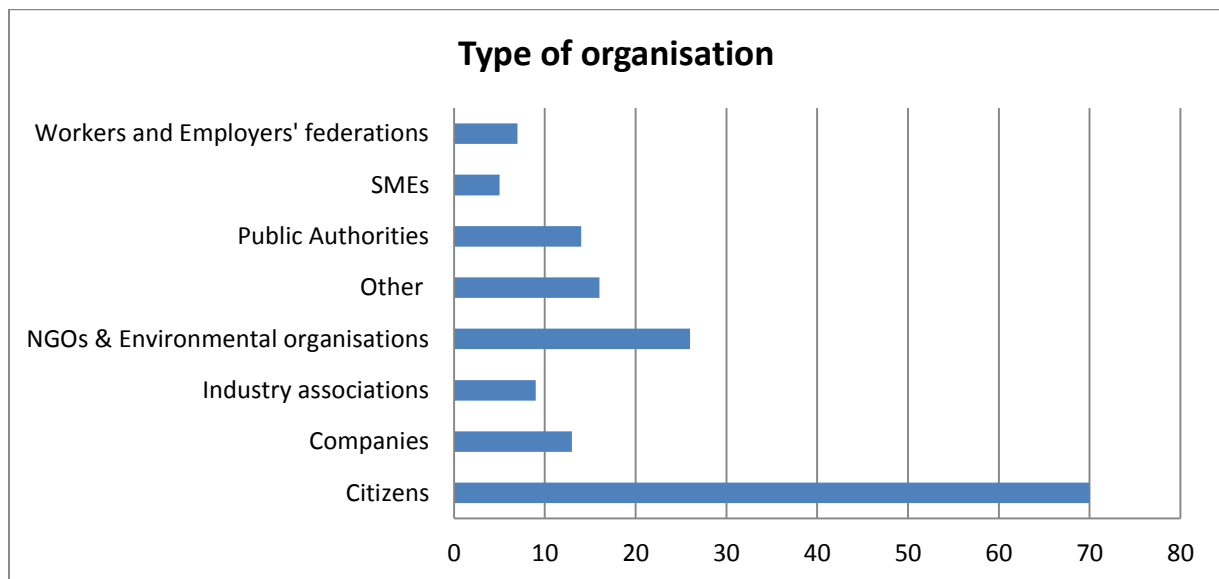
### **4.2.3 NSI West electricity**

#### **Overview of responses and types of stakeholders in the NSI West electricity priority corridor**

160 valid responses were received originating in 12 Member States.







*\*N.B! The charts shown above reflect the overall output including the answers without comments and thus the picture of the results is only partially reinforced through justified answers.*

This group of projects received numerous forms filled in with identical wording for the same projects. In some instances, the same individuals or organisations had sent their form both via email and by uploading it on the relevant website. It was decided, therefore, in some cases to group a few of those submissions and treat them as one set of comments, so as to draw a more objective conclusion.

#### **Overview of main comments to specific projects:**

##### ***Purifying -Pumped Hydroelectric Energy Storage (P-PHES Navaleo)***

This project received the largest number of positive and unique replies (69%) with several supporting documents. As mentioned by one of the respondents, this is an innovative project which combines energy storage with the purification of contaminated mine waters through a

hydraulic circuit of a pumping hydroelectric plant located in a mining reconversion zone. Some stakeholders mentioned the employment opportunities that may arise after the closure of coal mines as well as the integration of variable renewable energy in the Iberian Power System by providing pumped-storage with a power capacity of more than 500MW. A few of the position papers that were submitted in favour of the project mentioned that the use of hydraulic resources not only does this result in the reduction of CO<sub>2</sub> emissions, but also it will reduce the use of fossil fuels and the environmental issues related to their extraction, transportation and consumption.

#### ***Western interconnection FR-ES: Gatica (ES) – Aquitaine (Cubnezais) (FR)***

There was only one positive response; a number of negative responses were received from citizens (many of them using identical wording in Spanish), questioning the need for such a project in that specific area and its environmental sustainability.

One of the respondents argued that it would substantially affect their already densely inhabited territories causing some environmental issues such as important landscape change and noise pollution. There were quite a few stakeholders that referred to a similar 2013 PCI in the area: the submarine electric cable project in the Bay of Biscay and concluded that the present project was unnecessary.

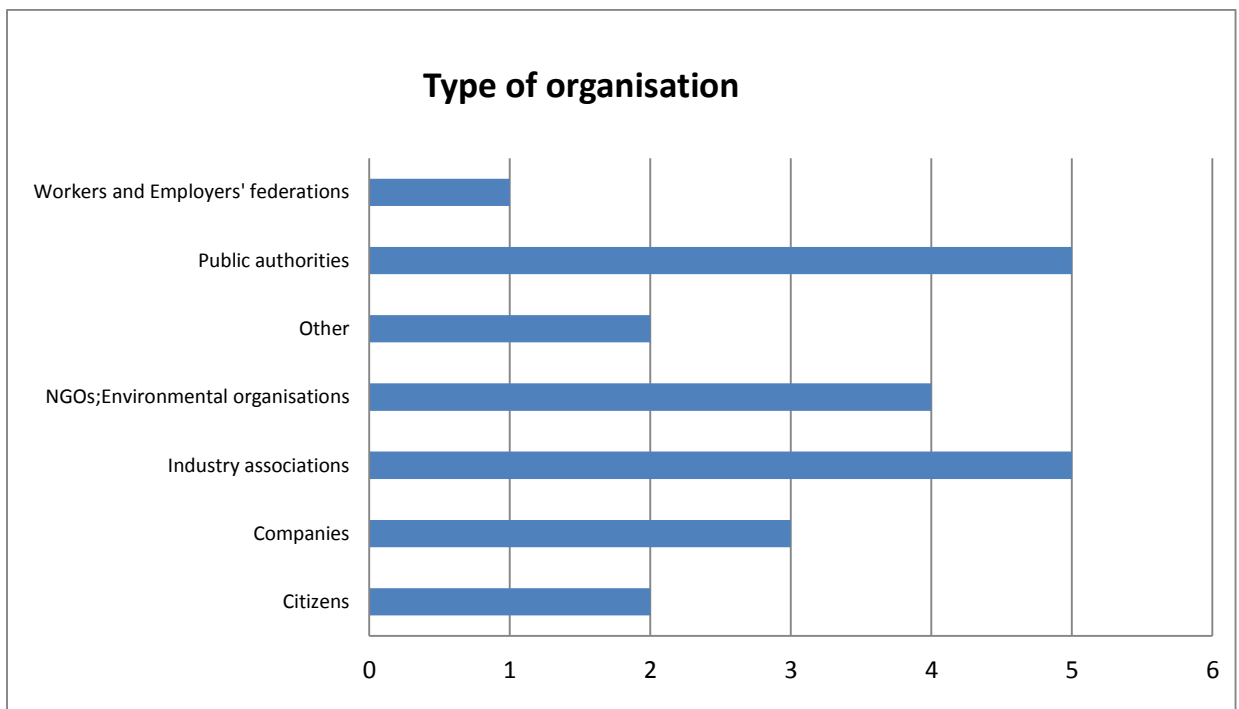
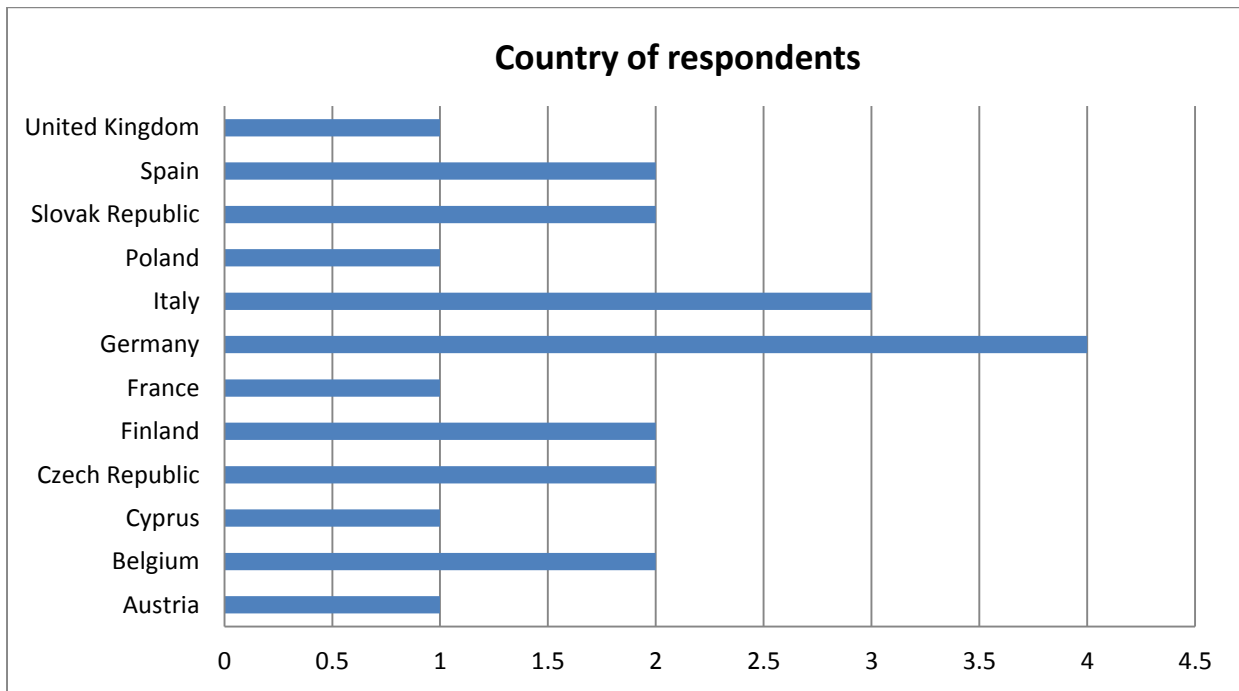
#### ***Reversible pumped-storage hydro-electric exploitation "MONT-NEGRE", Spain***

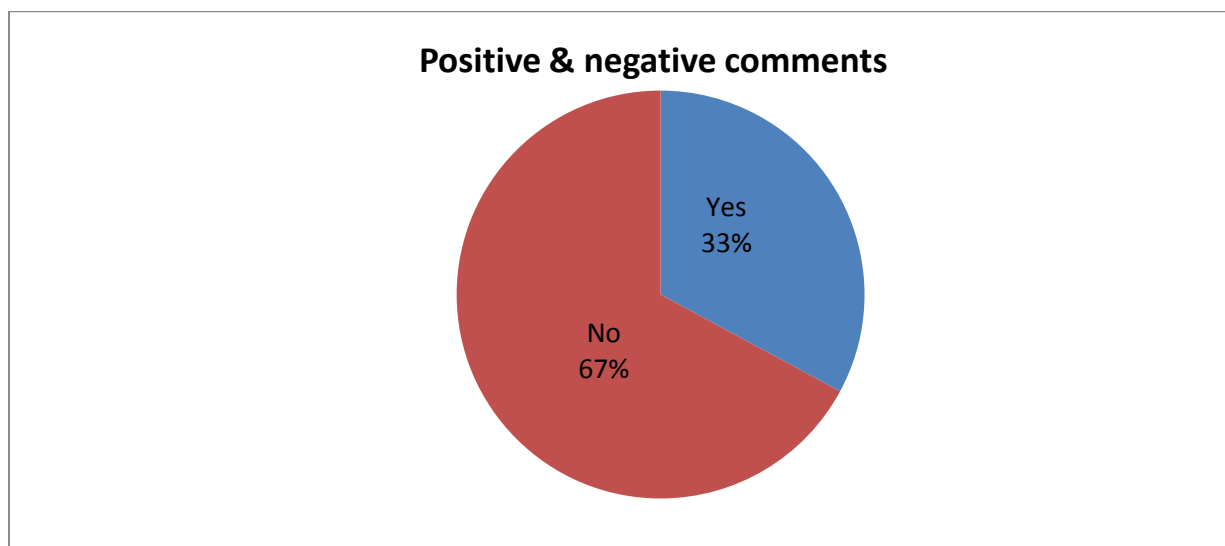
Some of the respondents have expressed scepticism regarding the inclusion of pumped storage and hydroelectric plants within the PCI list, arguing that pumped storage is active in competitive markets and should therefore be owned and operated by market actors and not by system operators or grid owners. Moreover, Birdlife Europe claimed that this project would directly affect several Natura 2000 sites.

### **4.2.4 NSI East electricity**

#### **Overview of responses and types of stakeholders in the NSI East electricity priority corridor**

22 valid responses were received originating in 12 Member States.





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### **Overview of main comments to specific projects:**

#### ***New interconnection between Italy and Tunisia***

This project received the highest percentage of positive comments (77.7%) and as opposed to other candidate projects the replies were not confined to "yes" or "no", but were accompanied by reasoning. One respondent mentioned that the project would have a positive effect on Europe-North Africa trade and market integration, and that it would contribute towards the reduction of balancing problems and would increase the security of supply in the region. World Energy Council (WEC) Italy also noted that it would play an important role in the integration of large amounts of renewable energy.

#### ***North South Eastern German Corridor - Wolmirstedt (DE) and Isar (DE)***

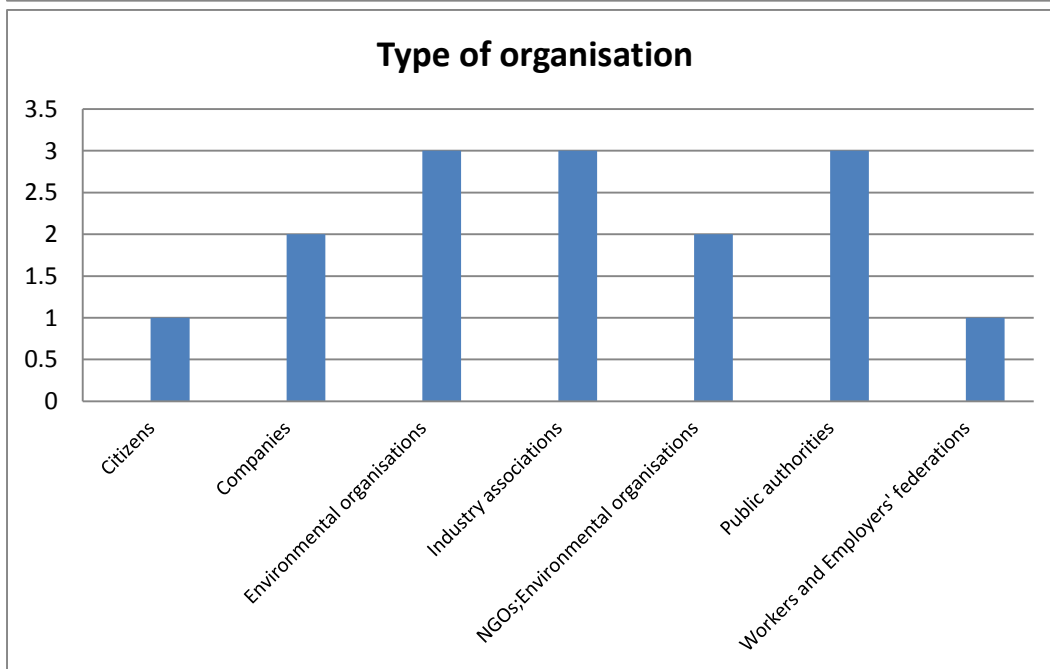
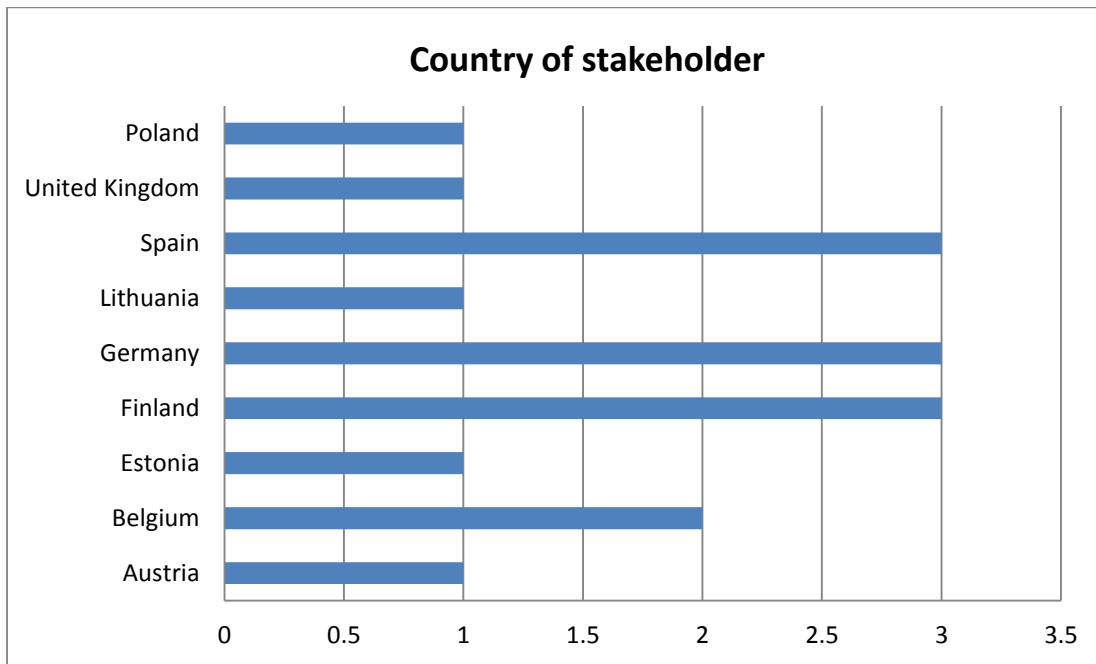
One of the stakeholders stated that the additional German internal north-south transmission capacity would enable more power trade between different RES-generating regions in Europe, enabling continued decarbonisation of the European power system and fully utilising the Nordic hydro and wind power resources, increasing, at the same time, the European security of supply and reducing price differences and redispatching costs.

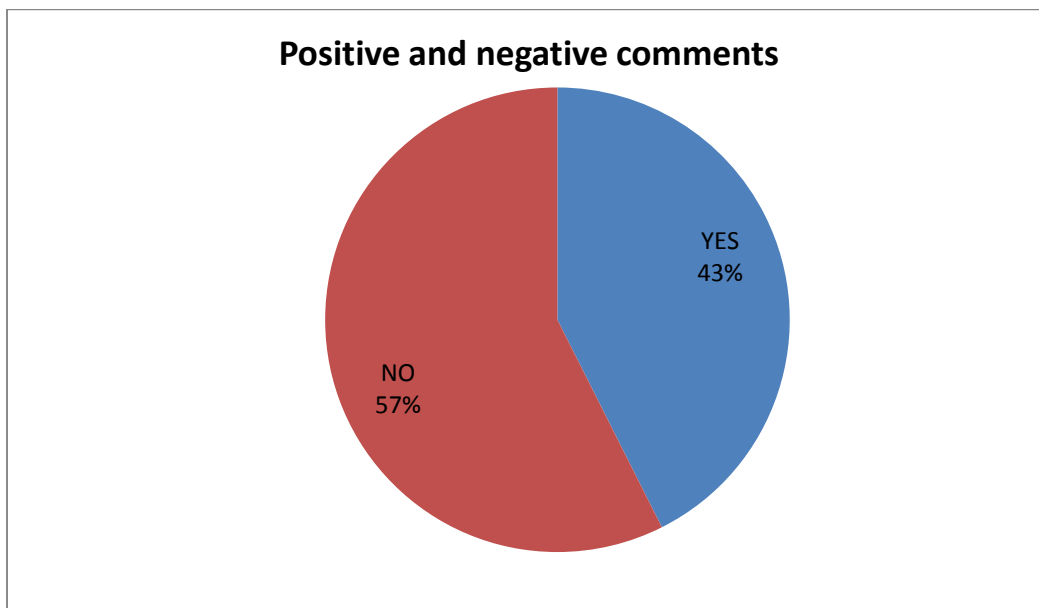
Another participant argued that a fast and sufficient internal German grid development could significantly reduce the extensive cross-border capacity curtailment to the Nordic area.

### **4.2.5 BEMIP electricity**

#### **Overview of responses and types of stakeholders in the BEMIP electricity priority corridor**

16 valid responses were received originating in 9 Member States.





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### **Overview of the main comments received on specific projects:**

#### ***Kriegers Flak CGS***

There were slightly more positive replies than negative ones for this project.

In terms of justifications, one respondent stated that new interconnectors between the Nordic market and continental Europe are greatly needed in order to enable more RES generation and improve security of supply in both parts of Europe and to reduce price differences between the regions.

Along the same lines, another participant argued that the increased interconnection between the Nordic and German electricity systems will further promote the internal market, establishing cross-border interconnection on the basis of offshore wind grid connection, allowing for better utilisation of offshore wind farm cables.

#### ***Baltic synchronisation projects***

These projects generally received positive feedback (55% of the total replies).

For example the new 400 kV interconnection line from a substation in Lithuania to the State border with Poland was regarded as necessary for the secure synchronous operation of the Baltic States power system with the Continental Europe Networks. One respondent mentioned that it will complement to ensure N-1 criteria and increase reliability of the synchronous operation, limiting at the same time the need to invest in additional generation capacities.

#### ***Finland-Sweden North 3rd interconnection Finland North (FI) - Sweden bidding area SE1/SE2***

This is a project that, according to some respondents, will offer additional transmission capacity between northern Sweden and Finland, enabling the transit of more RES generation from northern Scandinavia southwards through Finland. It was argued that the interconnection would reduce price differences and improve security of supply in Finland and in the Baltics. It would therefore improve security of supply in southern Sweden and reduce internal grid investment needs in Sweden.

It was also noted that this project would provide a solution to the current congestion issues in the areas, as the Finnish-Swedish border is a major bottleneck in the Baltic Sea electricity market, and that the congestions between Finland and Sweden continuously restrict power flows.

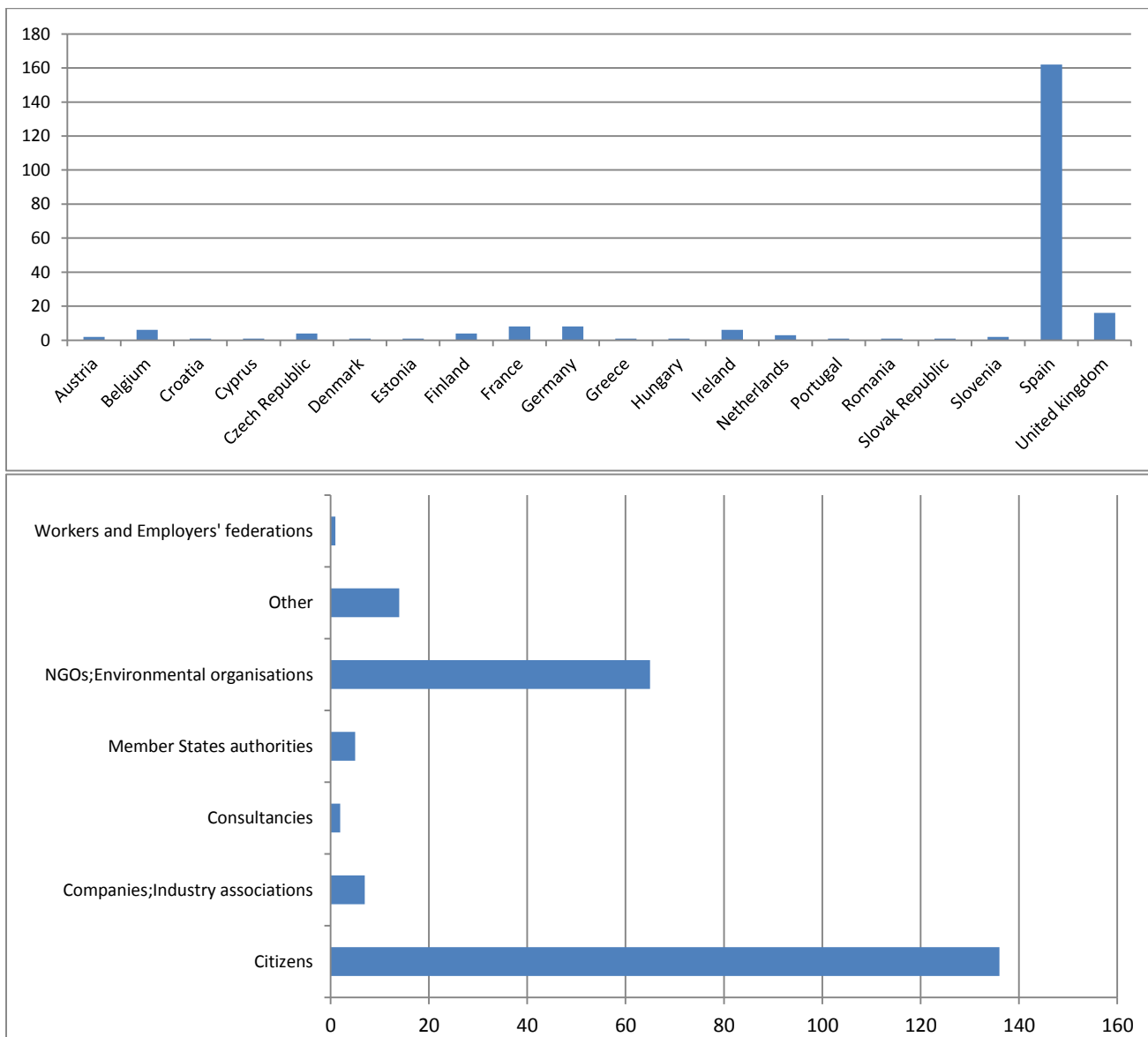
One stakeholder referred to the environmental impact of *Finland North (FI) - Sweden bidding area SE1/SE2* and *Ventspils-Tume-Imanta (LV)* stating that these projects could cause *unacceptable damage to species and habitats*, especially to some species of migrating birds (e.g. power lines closer to the coast of the Gulf of Botnia should be avoided due to conflict with migration).

## **4.3 Gas corridors**

### **4.3.1 General information for all 4 gas priority corridors**

#### **Overview of responses and type of stakeholders**

230 valid responses were received originating in 20 Member States via the EU Survey.



**Overview of comments received for all 4 gas corridors**

It should be noted that apart from the surveys that were submitted via the EU Survey platform, there have been 63 questionnaires sent via email. These questionnaires were identical to the block of 50 replies that were received through the EU Survey platform and coincided with the argumentation of the three organisations that submitted the relevant joint position papers as mentioned in section 4.1.

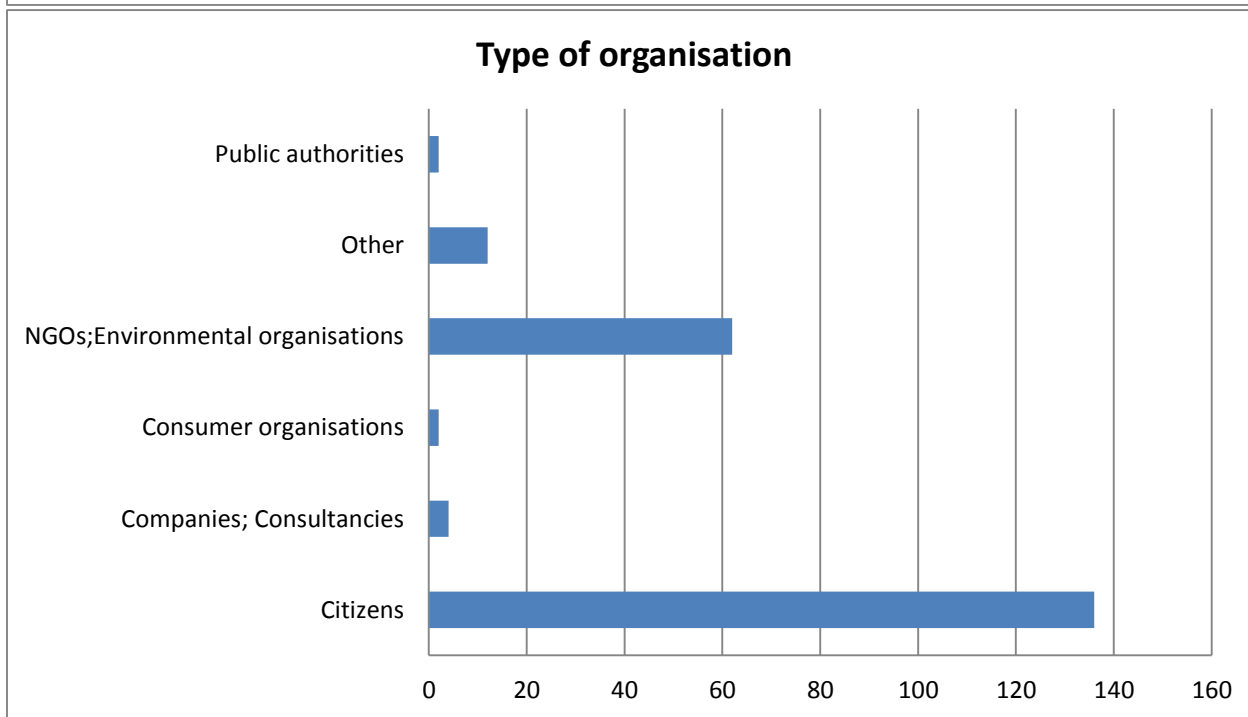
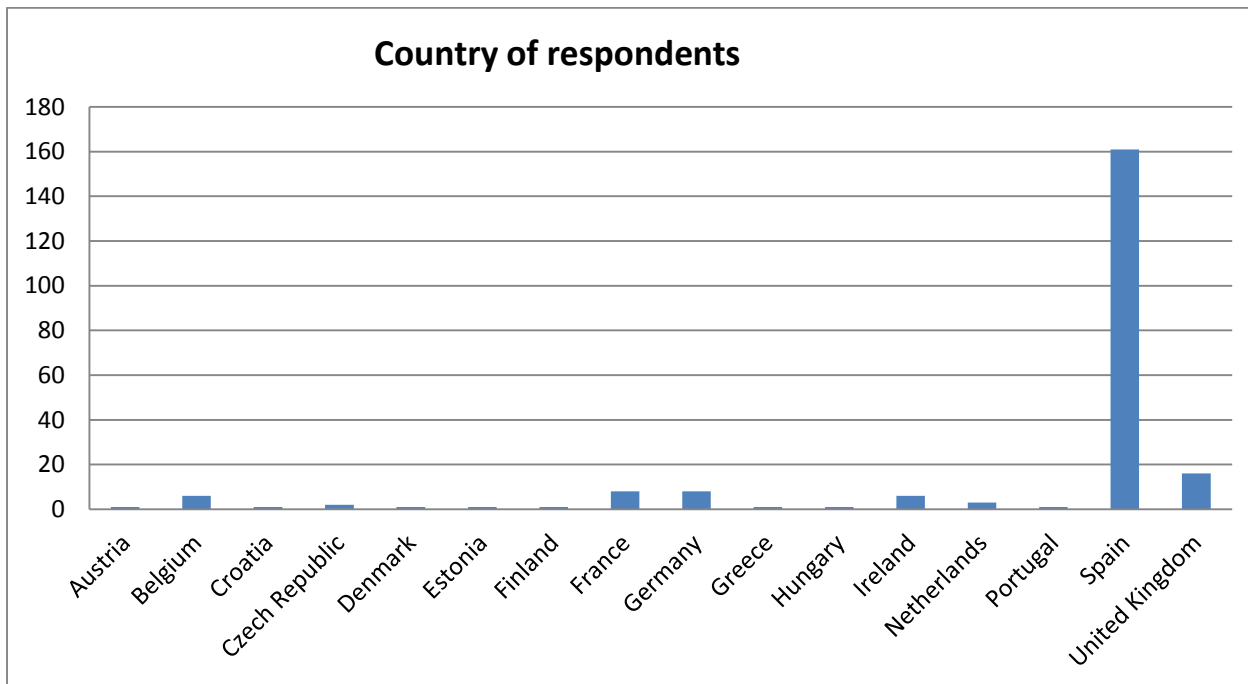
More specifically, the basis of the arguments of the opposing respondents, which applies to all gas candidate projects, was that EU climate objectives can be only achieved with a fast and well-organised phase-out of fossil fuel, which has to include gas. Furthermore, the key point was the decreasing consumption of gas in Europe, rendering those projects unnecessary and the risk of them becoming stranded assets.

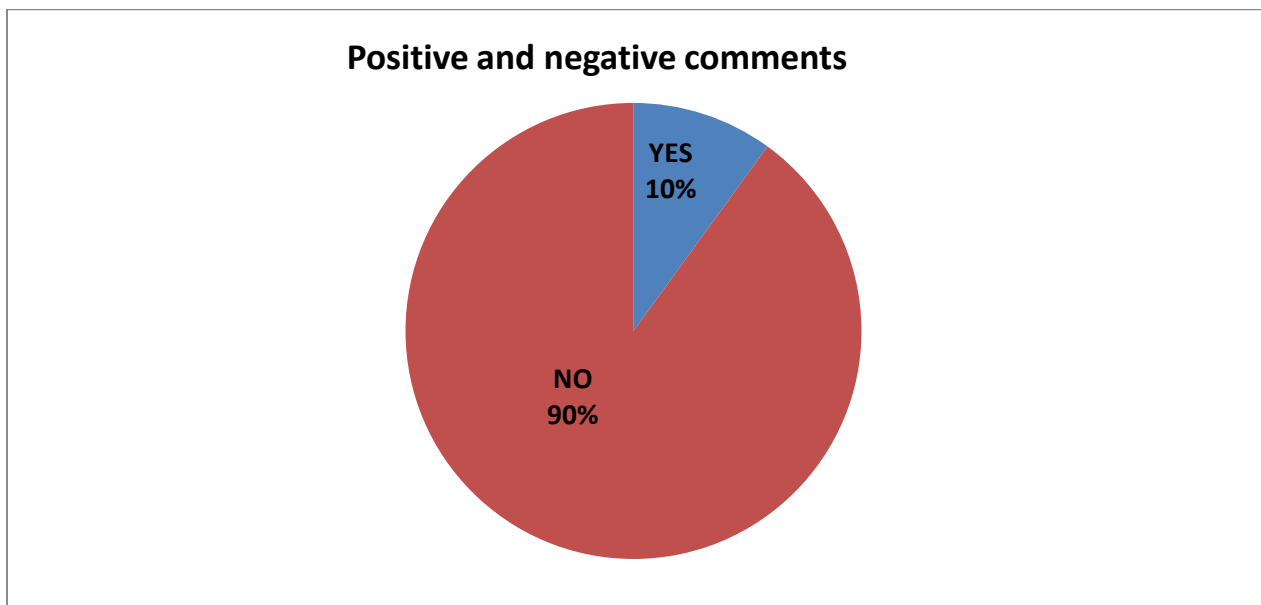
**4.3.3 NSI West gas**



**Overview of responses and types of stakeholders in the NSI West gas priority corridor**

218 valid responses were received originating in 16 Member States.





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### **Overview of main comments on specific projects:**

There were multiple sets of identical negative responses (including the 50 same answers that are mentioned in all four gas corridors) each of which was regarded as a sort of coordinated campaign and therefore it was considered as one response for the purposes of this report and the quantitative assessment of the responses. As demonstrated in the chart above, the vast majority of the comments were negative, while almost all the positive responses are not supported by specific arguments.

It is also worth mentioning that as shown in the first chart the vast majority of the respondents opposing Midcat were Spanish, the interconnection projects between Spain and Portugal as well as the STEP and Iberian-French corridor projects.

#### ***Iberian-French corridor: Eastern Axis - Midcat Project***

There was one positive comment highlighting the contribution of the project to the diversification of routes. However, several participants argued that the project would not add any value to both countries' security of supply and would not significantly contribute to either countries diversification of supply, as both France and Spain have a dense and well-developed gas infrastructure system meeting the N-1 minimum standards. Other comments focussed on the risk of the project becoming a stranded asset and on the fact that the expected high costs for the pipelines planned along with the over-dimensioned transport capacities could lead to higher energy bills and lower budget for energy efficiency and renewable energy projects.

#### ***Interconnection ES-PT (3rd IP)***

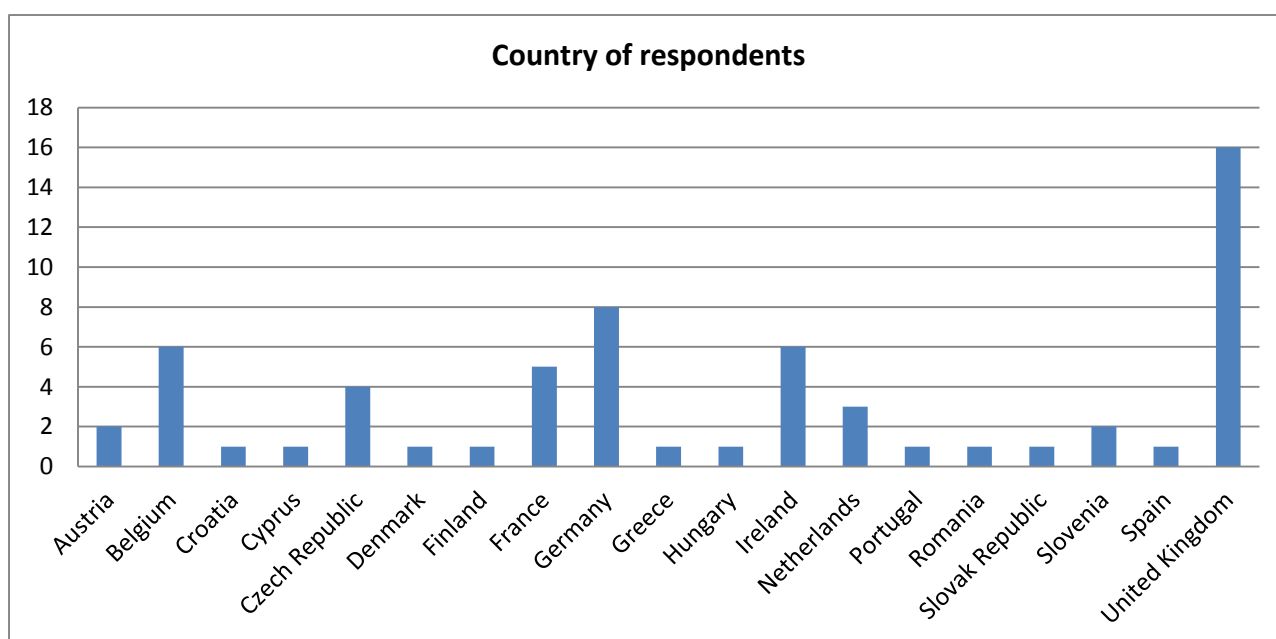
***PT-ES Interconnector (3rd IP) Pipeline Spanish Border-Celorico  
PT-ES Interconnector (3rd IP) Cantanhede Compressor Station  
PT-ES Interconnector (3rd IP) Pipeline Cantanhede-Mangualde  
Interconnection ES-PT (3rd IP) - 2nd phase***

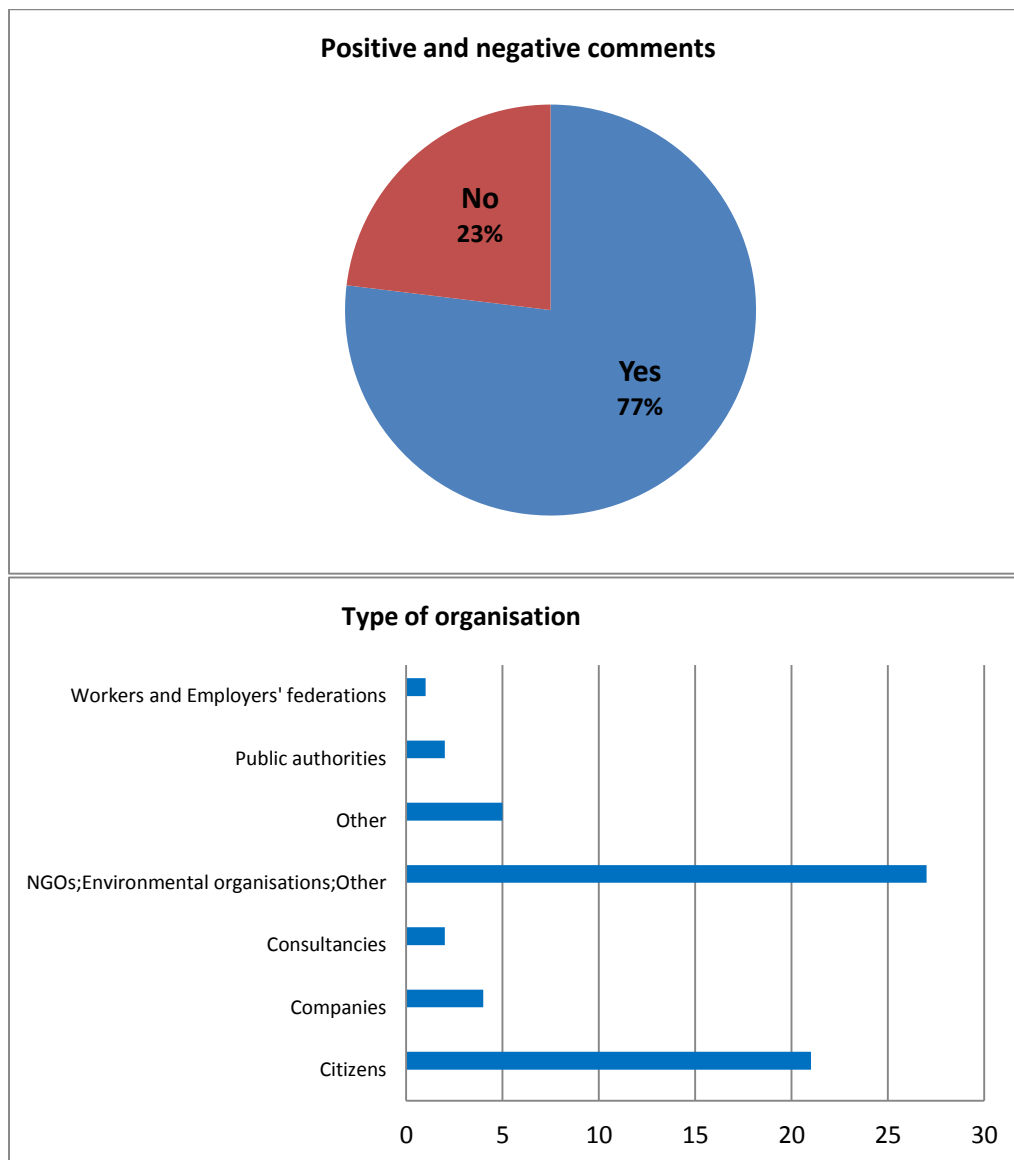
Several stakeholders suggested that there is currently sufficient gas transmission capacity between Portugal and Spain and that gas demand in Portugal is not significant enough to justify a third interconnection. In addition, the stakeholders suggested that the interconnection and the other proposed improvement of the transmission system would lead to higher prices for consumers in both countries.

### 4.3.3 NSI East gas

#### Overview of responses and type of stakeholders in the NSI East gas priority corridor

62 valid responses were received originating in 19 Member States.

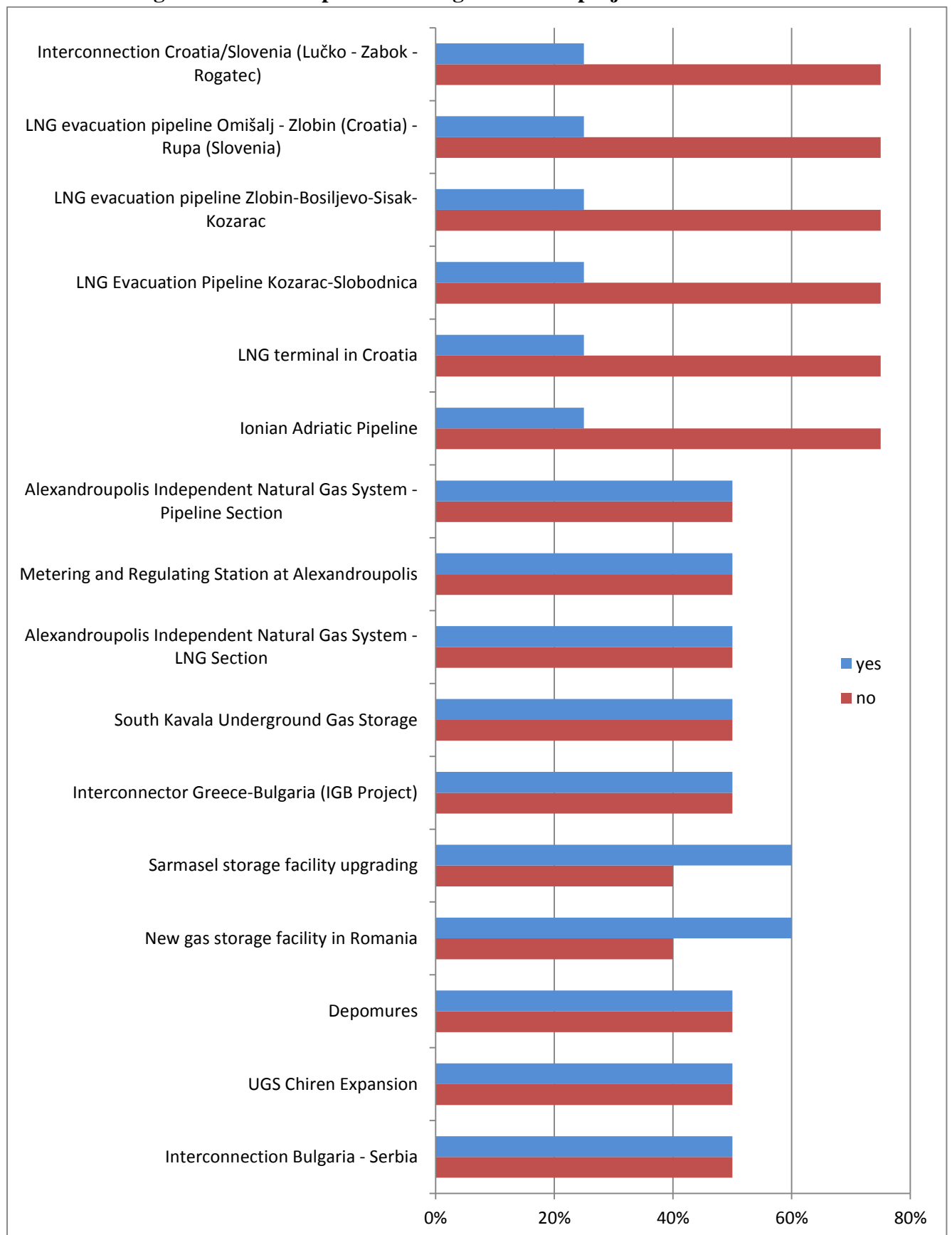




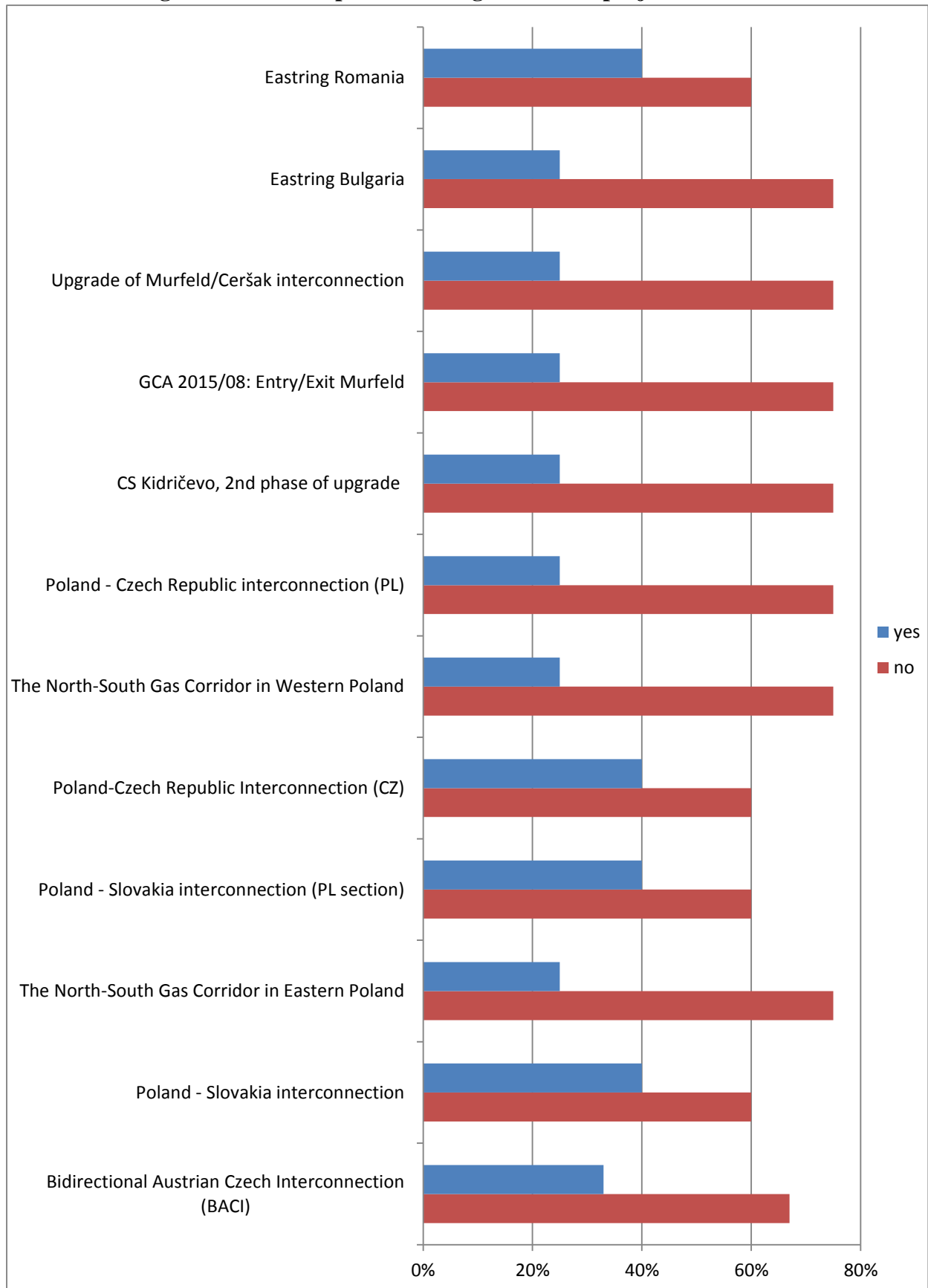
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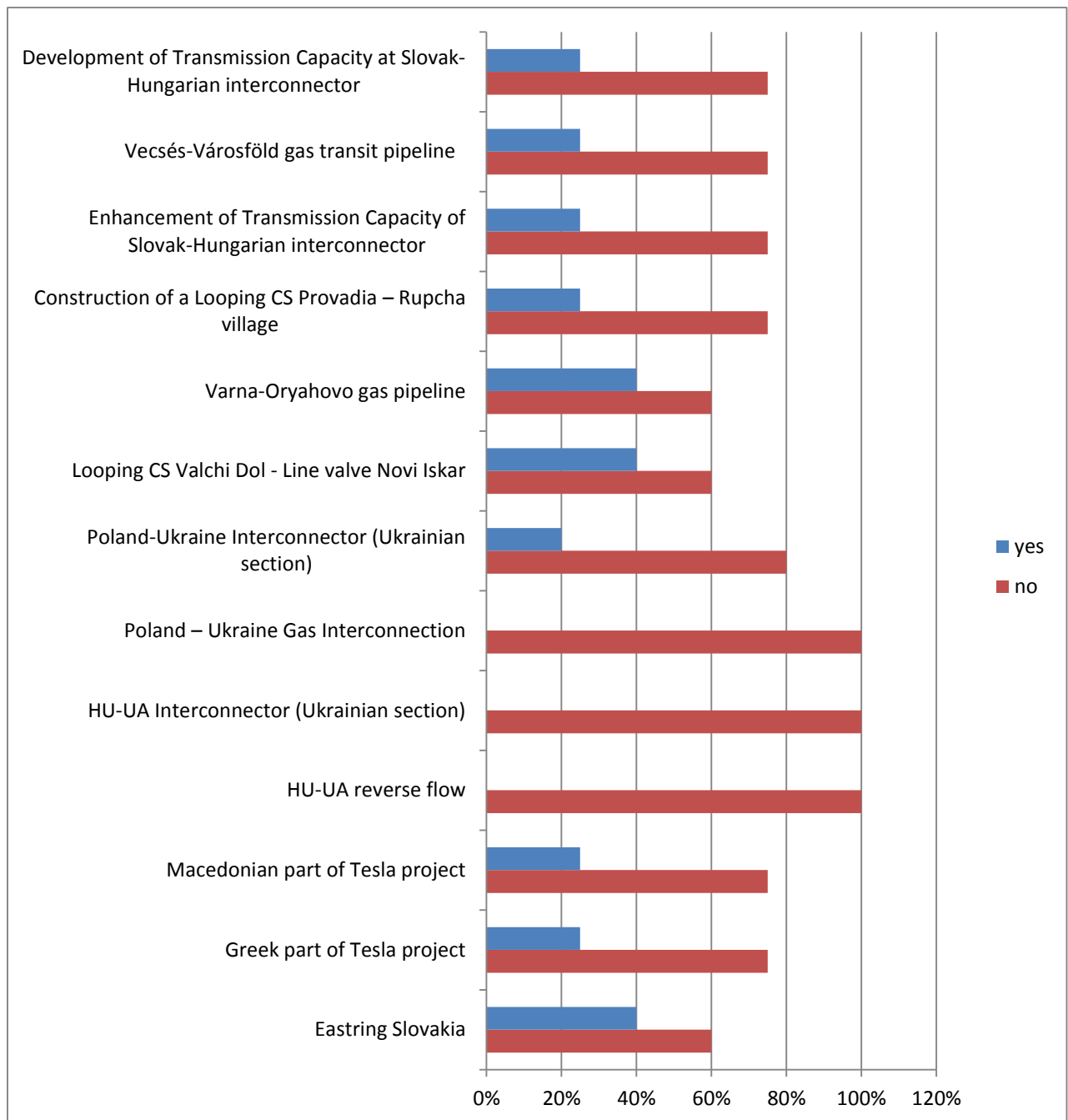
Given that – unlike the electricity candidate projects – the gas candidate projects of three gas corridors received many identical responses, it was easier to identify the percentages of the positive and negative comments per candidate project, which are illustrated accordingly in the charts below.

**Positive and negative comments per NSI East gas corridor project**

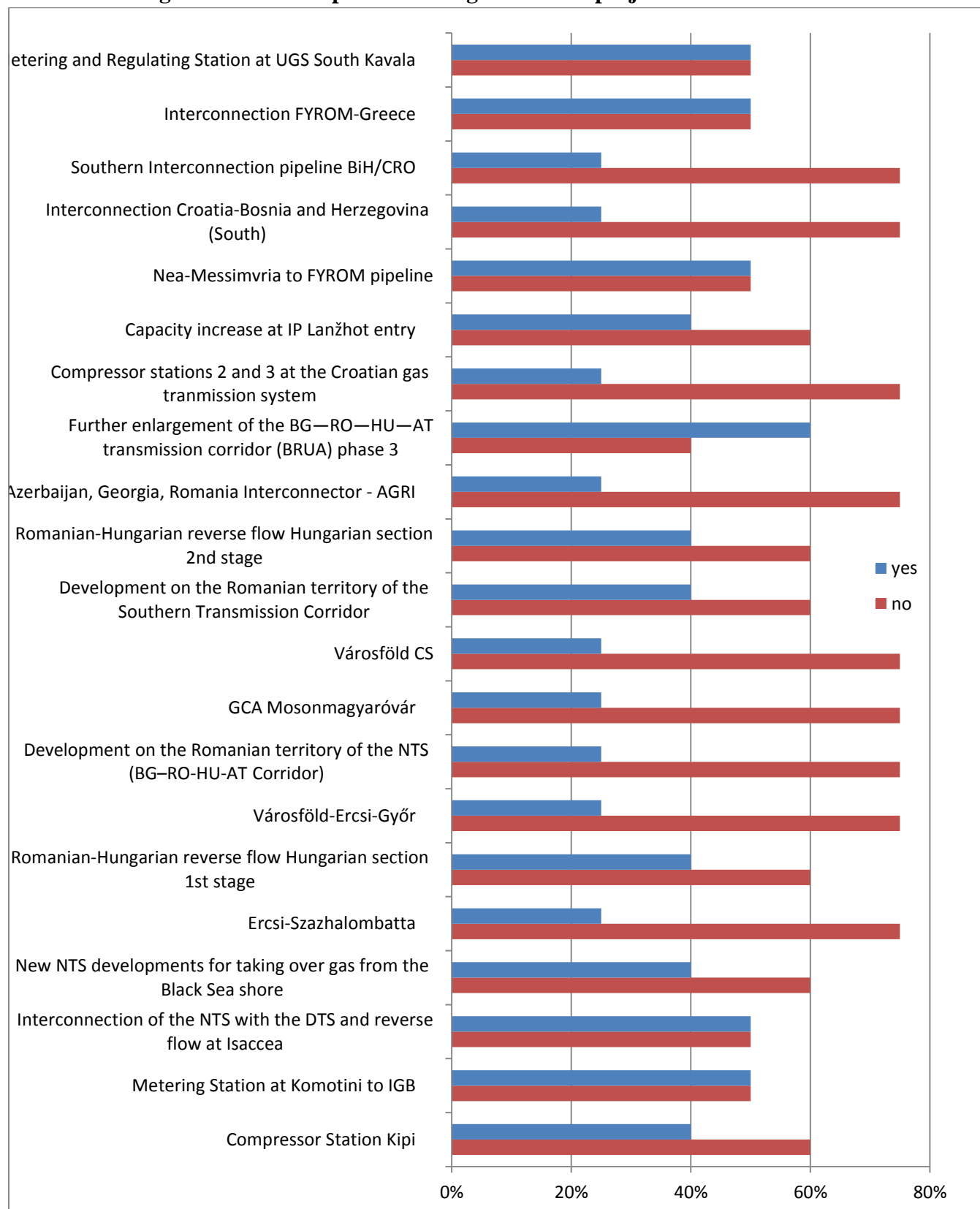


**Positive and negative comments per NSI East gas corridor project**





### Positive and negative comments per NSI East gas corridor project



*\*N.B! The charts shown above reflect the overall output including the answers without comments and thus the picture of the results is only partially reinforced through justified answers.*



**Overview of main comments on specific projects:**

50 out of 62 of the responses received were identical and opposed all gas projects.

Apart from these 50 responses, the majority of the rest were just no/yes responses without any further arguments.

***Interconnection Bulgaria - Serbia***

One of the positive comments highlighted that this project will contribute to the diversification of routes and gas sources, lift the energy isolation of Serbia and give access to LNG supply from Alexandroupolis INGS via Bulgaria. On the other hand, the 50 negative responses had adopted the position presented in the letter sent from the three NGOs, according to which this project will only benefit Bulgaria.

***UGS Chiren Expansion***

According to one respondent, this project will contribute to increasing the security of supply in Eastern Europe. However, there were doubts expressed as to whether it contributes significantly to diversification or market integration and whether there is sufficient demand to justify the project.

***Slovenia – Hungary interconnector: Slovenian-Hungarian interconnector (TRA-N-325), R15/1 Pince - Lendava – Kidričevo (TRA-N-112) and CS Kidričevo, 2nd phase of upgrade” (TRA-N-094)***

The basis of the negative comments was that this capacity increase exceeds Slovenia's consumption in 2015 and given the falling gas demand in both countries, the energy efficiency potential in the region and the already well-connected, dense and diversified gas infrastructure in Slovenia and Hungary, they questioned the project's expected benefit on supply security, diversification or response to the existing and future demand market.

Nevertheless, there was positive feedback received with respect to projects TRA-N-325 and TRA-N-112 underscoring their contribution to the security of supply in the region and the internal market integration, especially given that Slovenia has no national gas storage. Moreover, the Slovenian gas transmission system is connected with the Italian gas transmission system and therefore the interconnector will provide Hungary with access to the Italian gas market and LNG supplies.

***Bidirectional Austrian-Czech Interconnector (BACI, formerly LBL project)  
Bidirectional Austrian Czech Interconnection (BACI)***

These two projects attracted both negative and positive comments. The opponents of the project pointed out that these projects did not seem to have a “significant impact” on the relevant countries and therefore should not constitute a “priority” according to the TEN-E Regulation. They questioned whether they would increase the integration of those countries in a reasonable and necessary way, for the “common interest” (i.e. for another reason than business

development). They also raised concerns that it may negatively impact the production costs that will be reflected in the energy bills of the end-users.

Nevertheless, the positive comments focussed on their contribution to the market integration, security of supply and diversification of supply routes. They argued that this interconnection would bring a significant welfare gain in view of the expected price convergence between the Austrian and Czech gas market, while increasing retail market efficiency of liquidity and market depth will allow for welfare gains in terms of lower retail prices for Czech end-users.

### ***Eastring Slovakia***

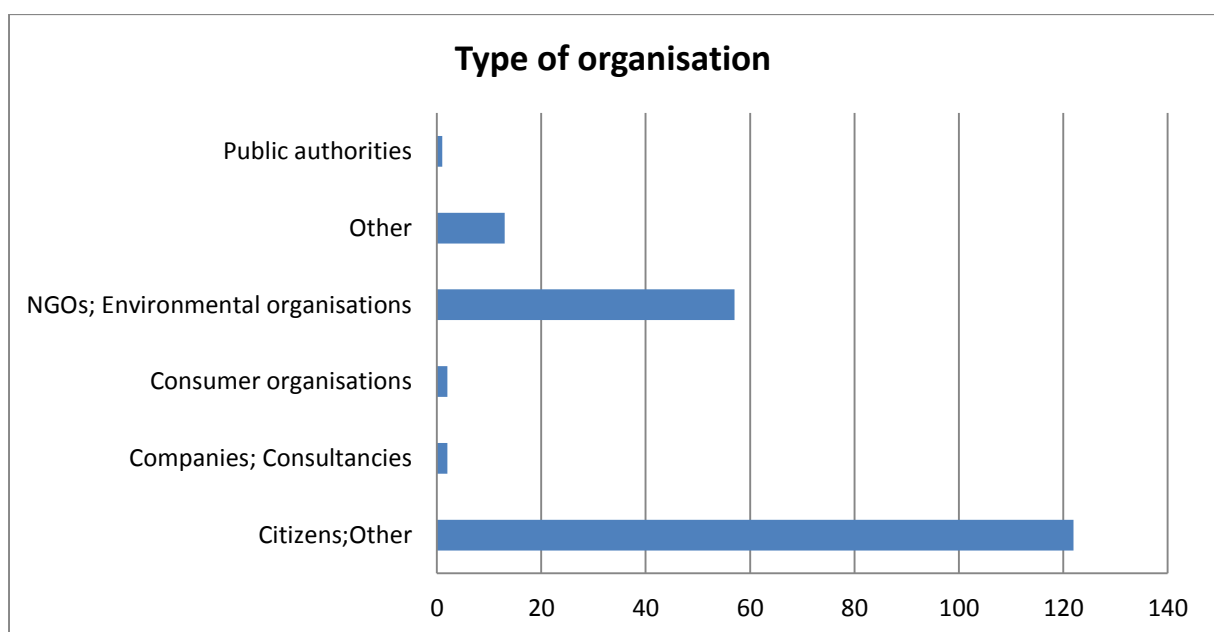
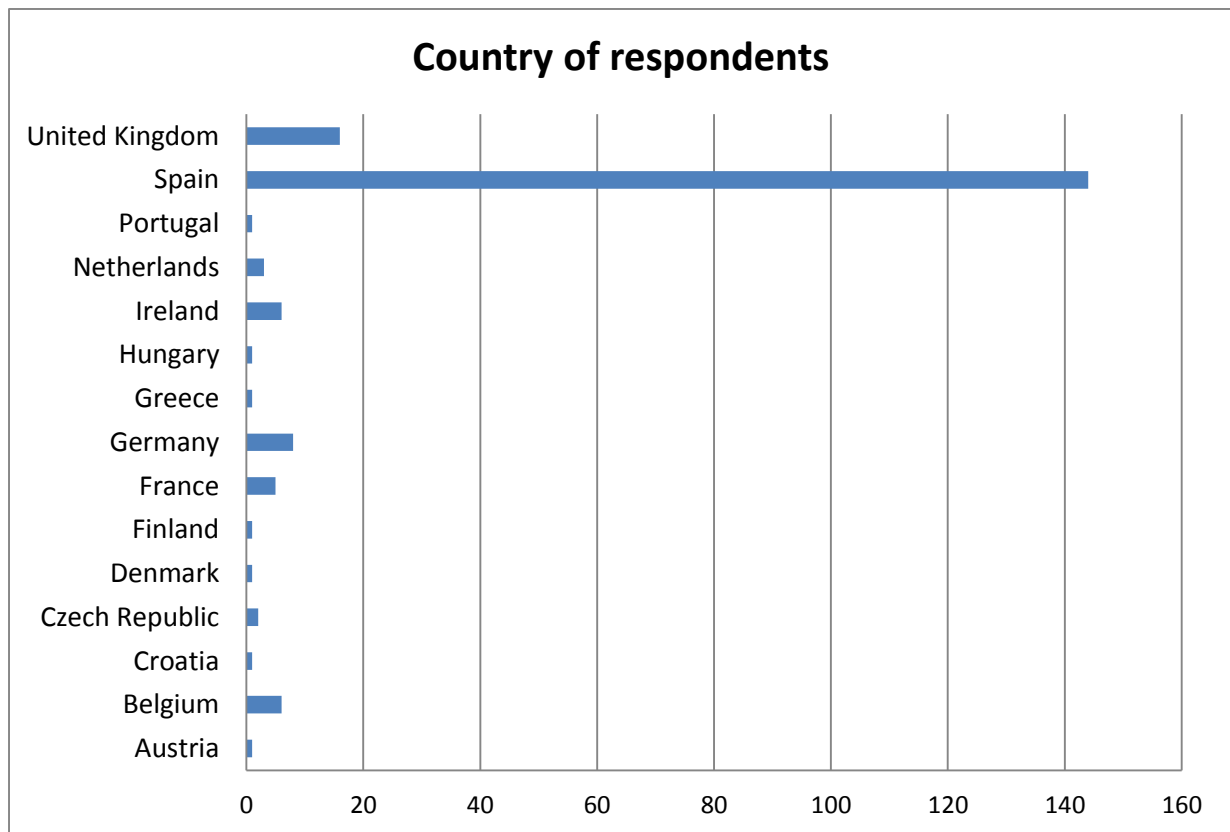
The project received two positive comments arguing that it would bring gas from new gas sources to the Central and South–Eastern Europe via a new gas route and that together with another PCI project TRA-N-190 Poland–Slovakia interconnection, it will interconnect efficiently South and North of Europe enhancing security of supply of the most vulnerable region and increasing the social welfare of the relevant countries.

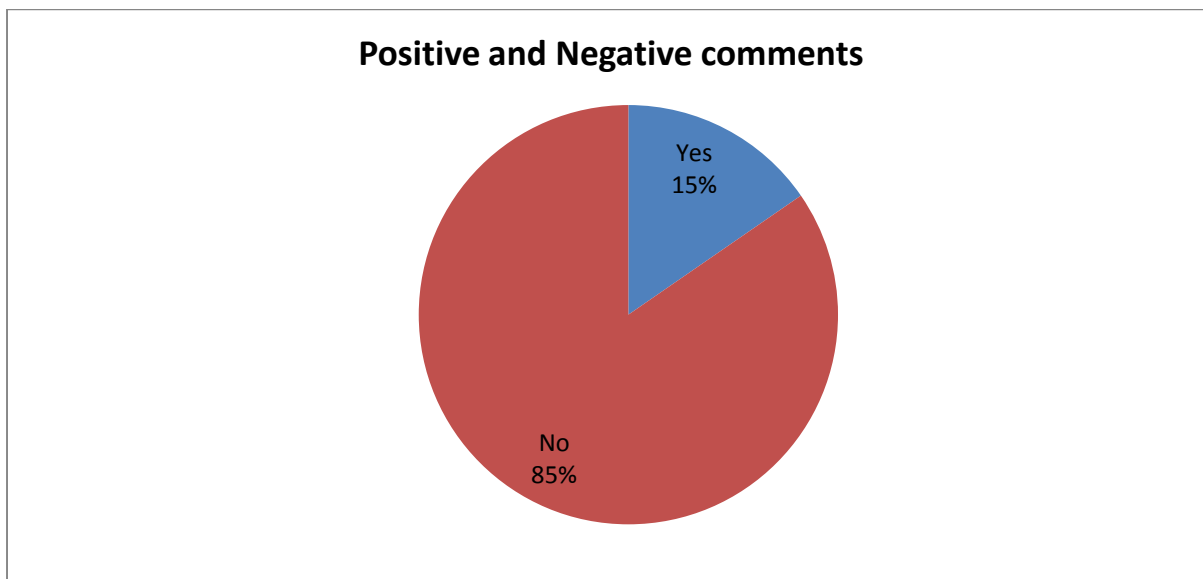
The negative comments emphasised the lack of necessity mentioning that gas demand in the region has been in steep decline since 2010 and therefore, Eastring risks becoming merely additional transmission capacity for more Russian gas and ultimately not contributing to any of the four criteria set for PCIs, particularly diversification and security of supply.

### 4.3.4 Southern Gas Corridor

#### Overview of responses and types of stakeholders in the Southern Gas priority corridor

197 valid responses were received originating in 15 Member States.





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### **Overview of main comments on specific projects:**

There were very few comments from stakeholders of the region, while the vast majority of the respondents were from Spain and they all expressed a negative view on the following projects: Trans Adriatic Pipeline, TANAP, Trans-Caspian, Expansion of the South Caucasus Pipeline, Metering and Regulating station at Nea Messimvria, Compressor station at Nea Messimvria, Development for new import from the South (Adriatica Line), Compressor Station Kipi and Compressor Station Kipi Increment. As in the other 3 gas corridors the group of 50 identical responses opposed to all the proposed projects. Moreover, the positive responses were submitted with no further reasoning behind the choice.

*Trans Adriatic Pipeline*  
*TANAP - Trans Anatolian Natural Gas Pipeline Project*  
*Expansion of the South Caucasus Pipeline*  
*Trans-Caspian*

The opposing stakeholders raised concerns about the negative environmental and social impact of the projects, questioned the contribution of the proposed projects to enhancing security of supply due to the unstable political situation in the providers' countries and highlighted the risk that certain projects could become stranded assets.

As far as the other 5 projects are concerned, namely *Metering and Regulating station at Nea Messimvria*, *Compressor station at Nea Messimvria*, *Development for new import from the South (Adriatica Line)*, *Compressor Station Kipi* and *Compressor Station Kipi Increment*, the basis of the negative comments was the fact that they are all related to the Trans Adriatic Pipeline and therefore they should not be granted the PCI status.

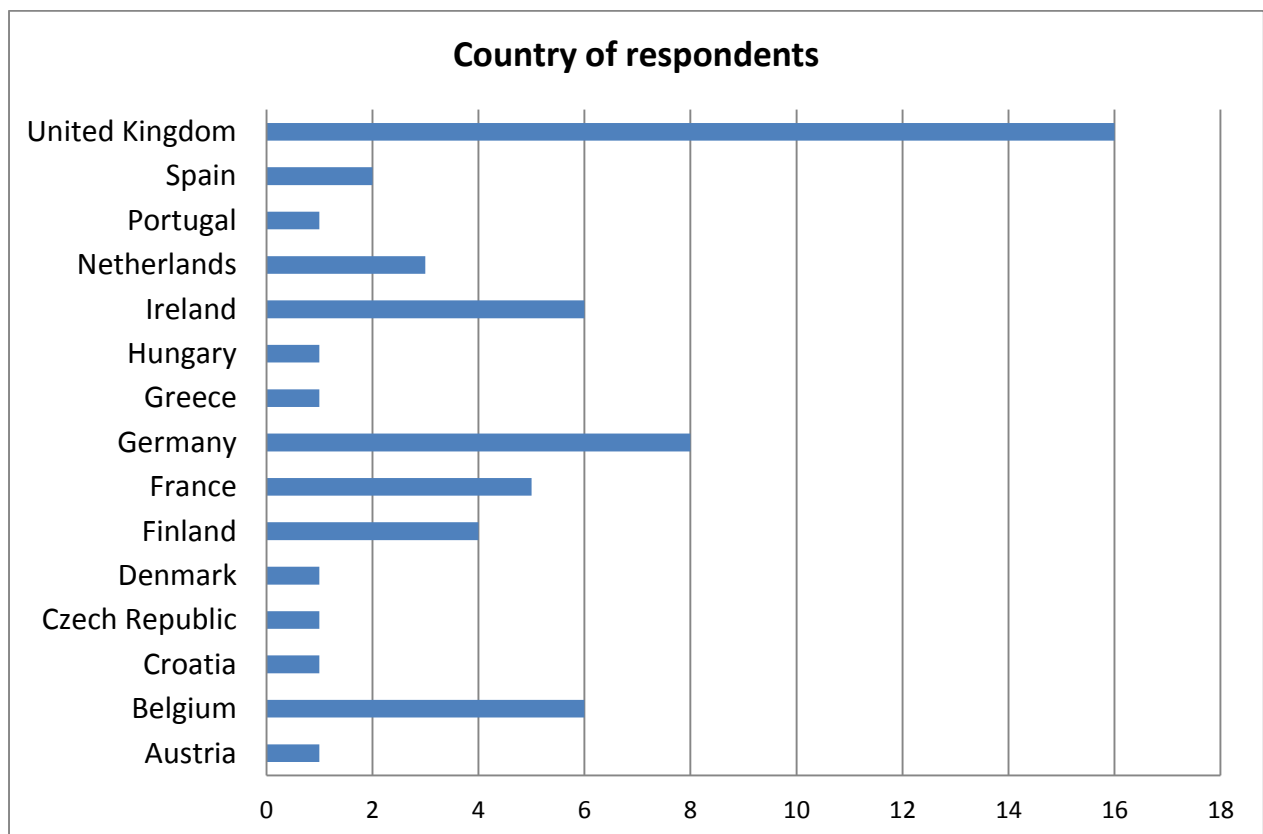
### *East Med Pipeline*

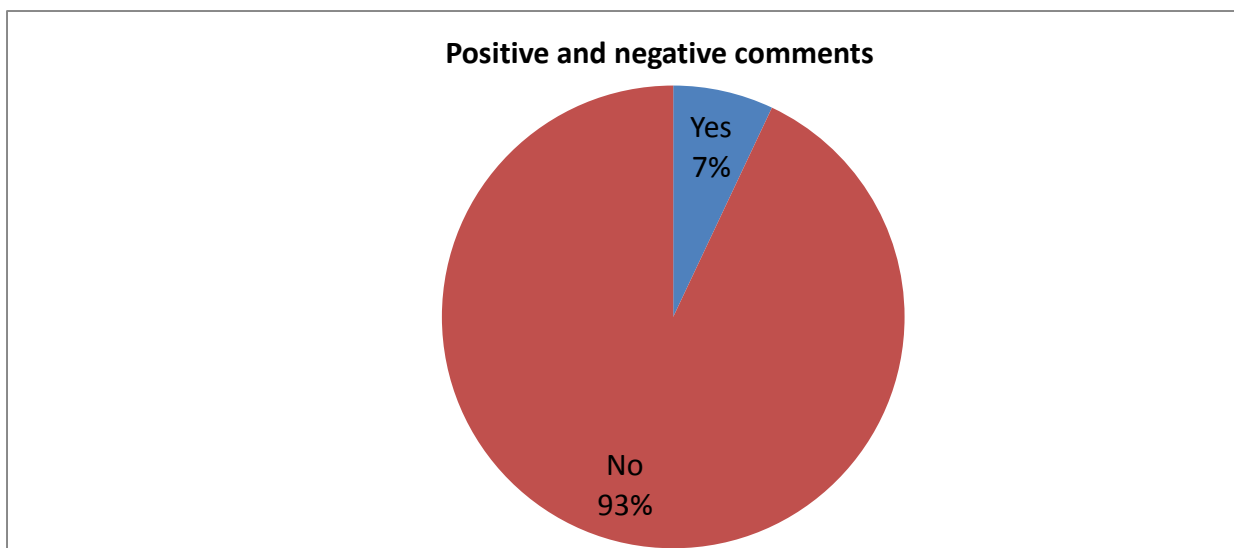
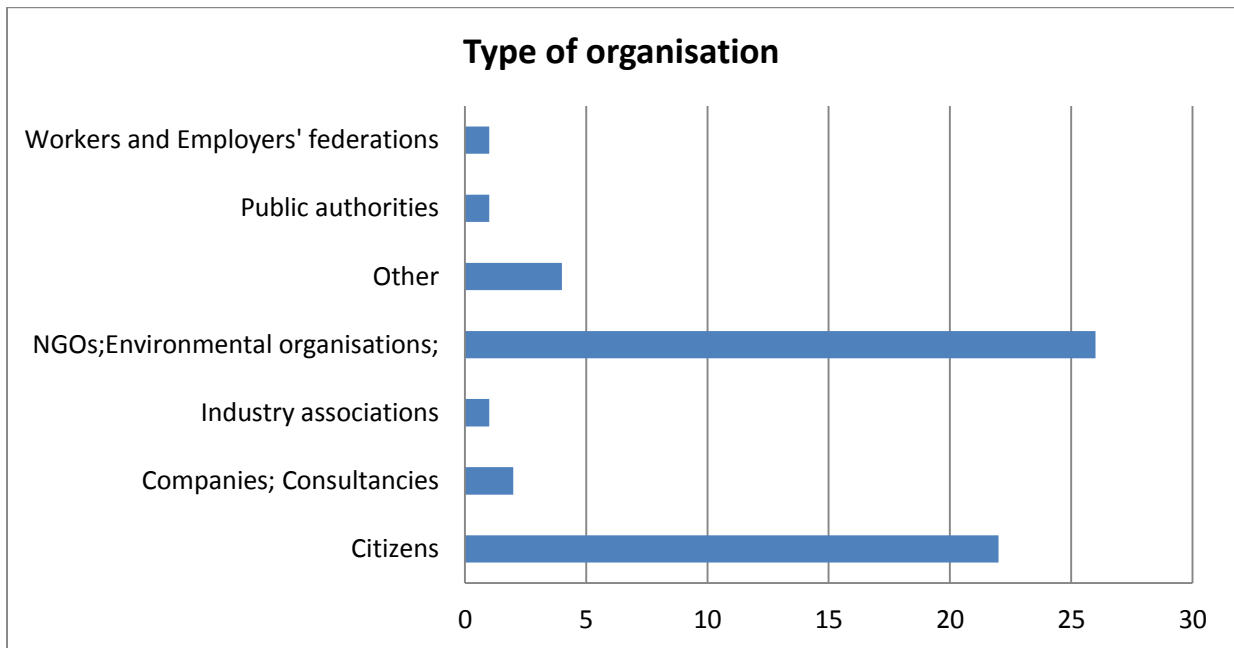
The respondents who provided negative feedback highlighted the unstable geopolitical situation of the region and the unresolved Cyprus issue.

#### **4.3.5 BEMIP Gas**

Overview of responses and types of stakeholders in the BEMIP gas priority corridor

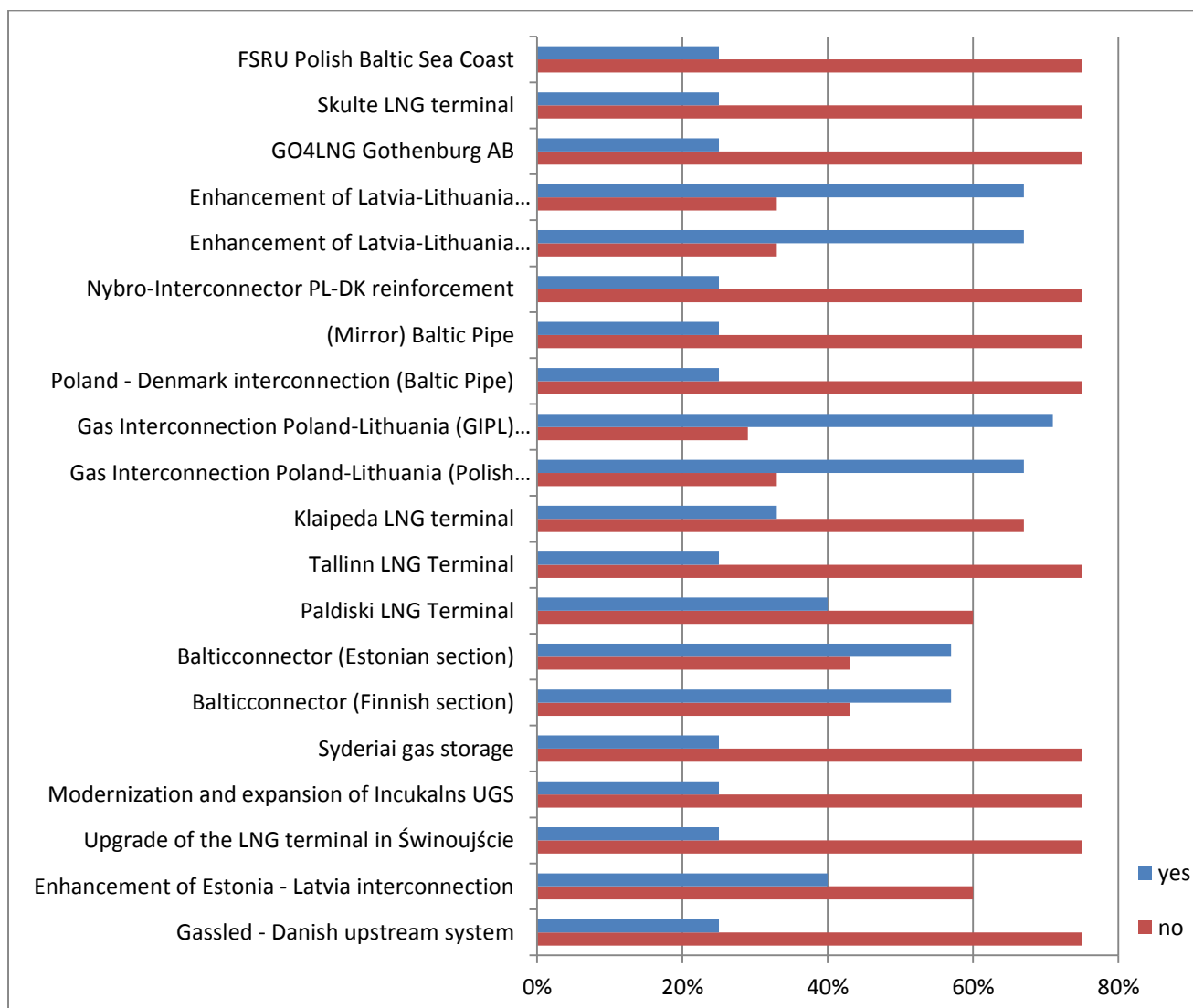
57 valid responses were received, but only 13 originating in BEMIP Member States.





*\*N.B! The charts shown above reflect the overall output including the answers without comments and thus the picture of the results is only partially reinforced through justified answers.*

## Positive and negative comments per project



### Overview of main comments on specific projects:

50 out of 57 responses were identical, opposing to all gas projects adopting the argumentation of the three NGOs as presented in the position papers that they submitted.

The basis of those arguments is that the EU climate objectives can be only achieved with a fast and well-organised phase-out of fossil fuels including gas. They all questioned the necessity of some projects arguing that they benefit solely one country and that parts of the existing gas infrastructure are largely underused.

### *Balticconnector (Finnish section)*

The positive comments underlined the contribution of the project to the opening of the gas markets in Finland and Baltic countries, as well as the dire need for enhancement and improvement of natural gas pipelines both between Baltic countries and between Lithuania and

Poland. It was also noted that these developments should lead to lower gas prices and safeguard market competition.

The counterarguments were based on the drop of gas demand in the last years questioning therefore the necessity of building such gas infrastructure.

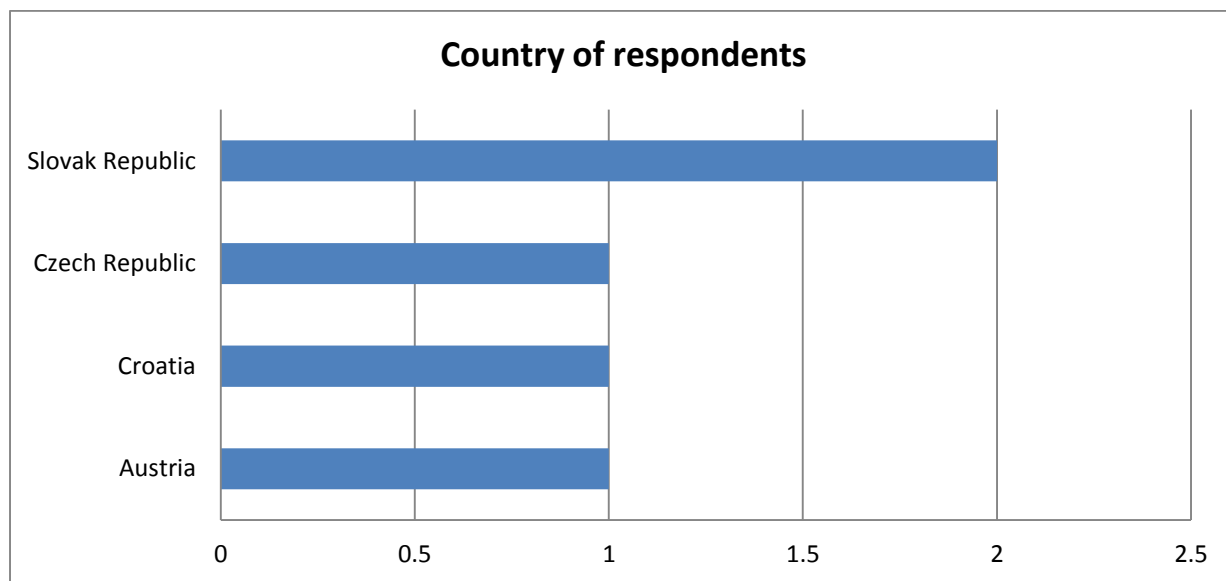
#### ***Gas Interconnection Poland-Lithuania (GIPL) (Lithuanian section)***

It is interesting to note that all the positive comments that were accompanied by a justification were submitted by Finnish stakeholders that highlighted the significance of the Poland-Lithuania Gas Interconnection for Finland, as it will contribute to the integration of the Finnish and Baltic gas markets. The negative comments mainly questioned the necessity of the project given the declining gas demand.

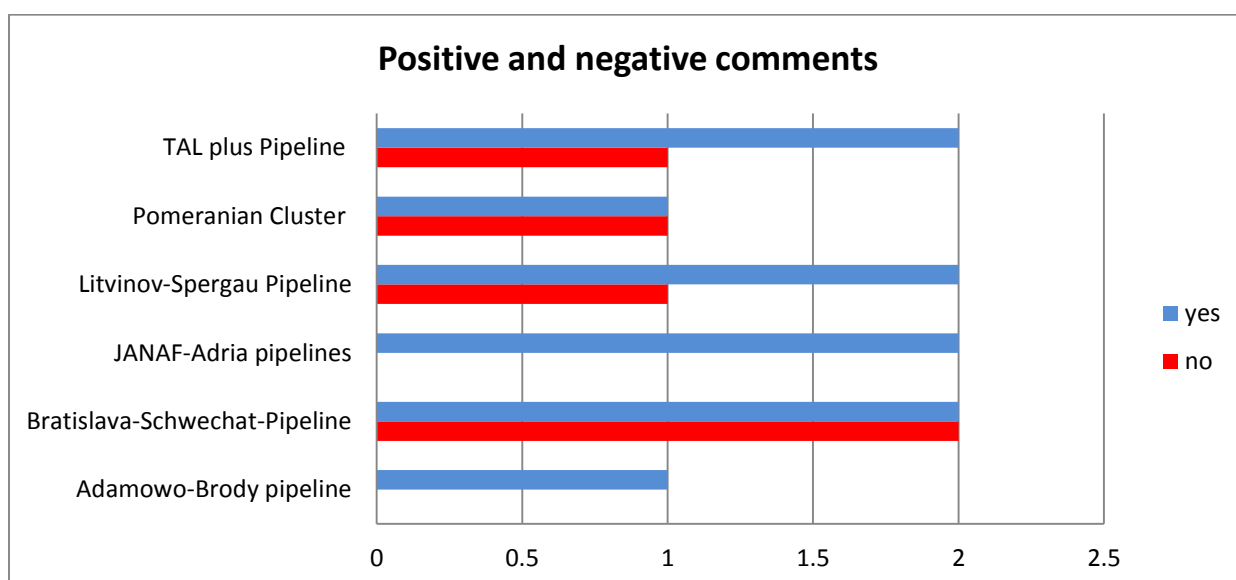
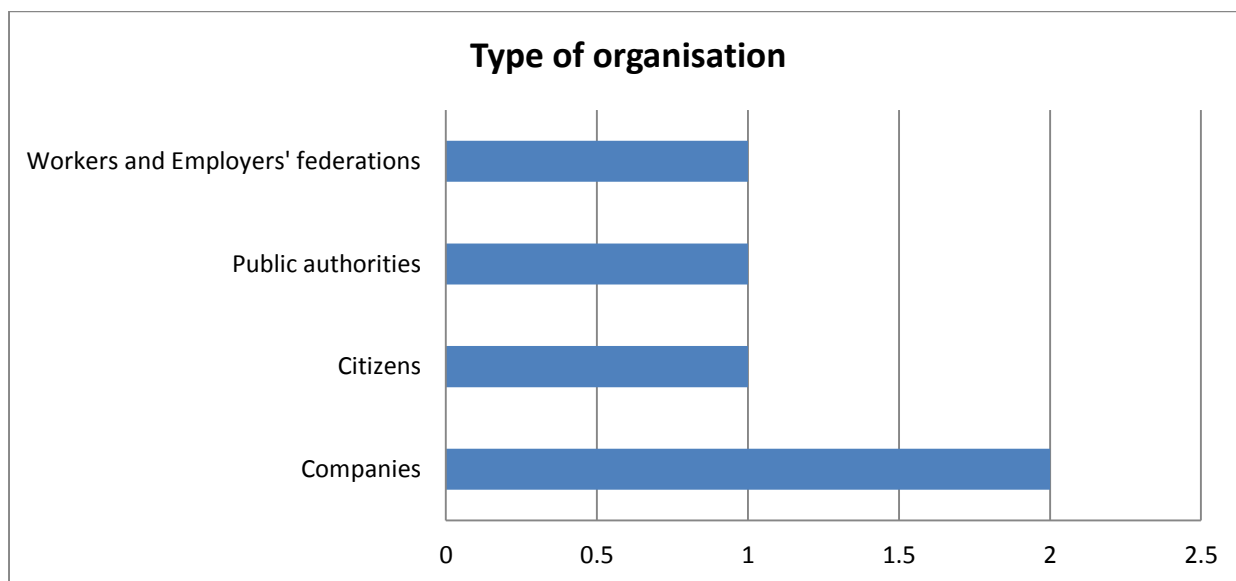
### **4.4 Oil (public consultation conducted between 3 April 2017 and 26 June 2017)**

#### **Overview of responses and types of stakeholders**

5 valid responses were received originating in 4 Member States.







*\*N.B! The charts shown above reflect the overall output including the answers without comments and thus the picture of the results is only partially reinforced through justified answers.*

### **Overview of main comments on specific projects:**

#### ***Bratislava-Schwechat-Pipeline***

This project received two positive responses without detailed justification and two negative responses with specific arguments presented. The opponents of the project emphasised its potential negative impact on the environment and the underground aquifers, while they argued that the project cannot bring more oil security/supplies for Slovakia, since there is not enough transportation capacity in pipelines AWG (Austria) and TAL.

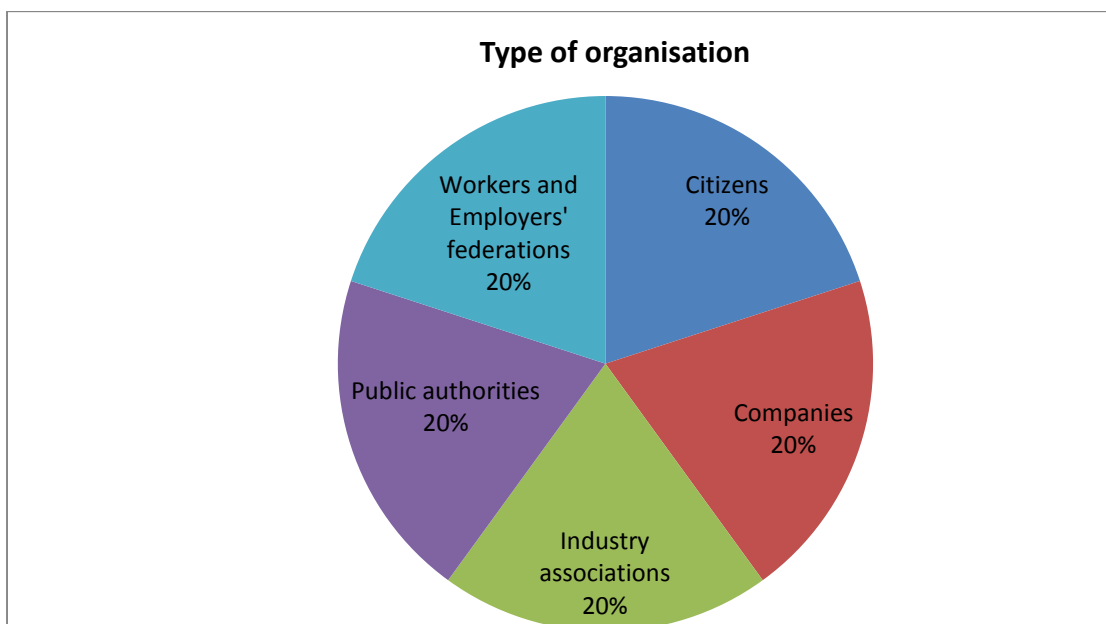
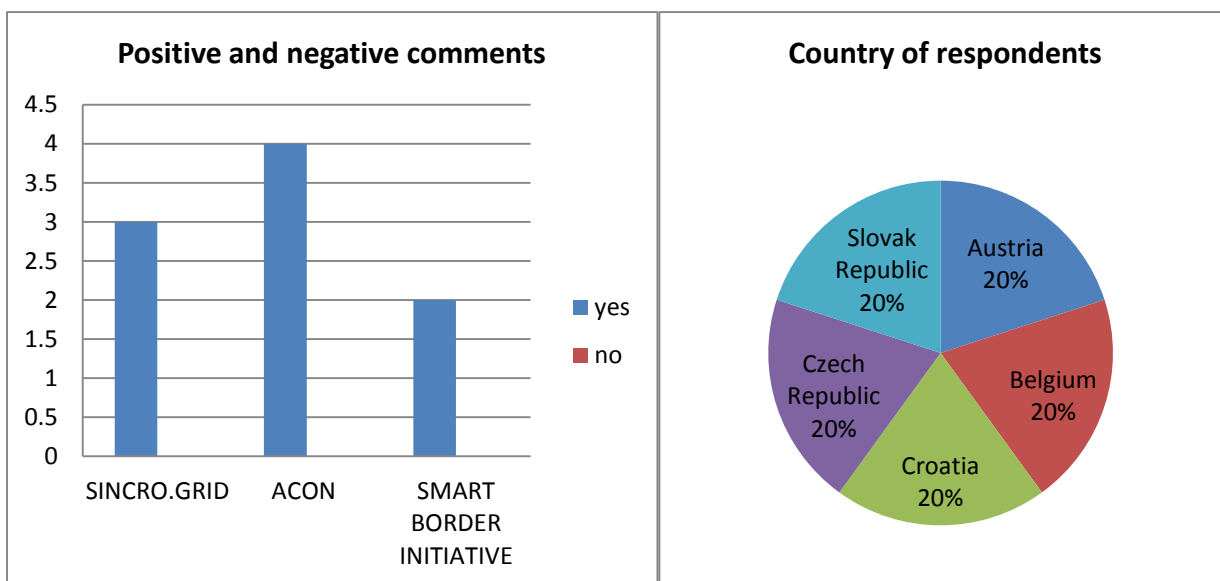
**TAL plus Pipeline**

The project received one negative response without detailed comment and two positive. The respondents who gave a positive comment argued that the capacity upgrade of the existing TAL Pipeline will allow for full diversification of oil supply to the Czech Republic and will keep enough capacity for Germany in the event of suspension of the SPSE pipeline.

**4.5 Smart Grids (public consultation conducted between 3 April and 26 June 2017)**

Overview of responses and types of stakeholders

5 valid responses were received originating in 5 Member States.



*\*N.B! The charts shown above reflect the overall output including the answers without comments and thus the picture of the results is only partially reinforced through justified answers.*

**Overview of main comments on specific projects:**

***ACON (Again COnnected Networks)***

This project received four positive comments, two of which with justification. The respondents argued that the cross-border cooperation between Czech Republic and Slovakia will improve the delivery of electricity in both regions ensuring an economically efficient, sustainable electricity system with low losses and high quality of supply and safety and implementation of smart elements into distribution network.