

Formularz zgłaszania uwag do projektu *Polskiej Strategii Wodorowej do roku 2030 z perspektywą do 2040 r.*

Zgłaszający uwagę (nazwa instytucji, organizacji lub imię i nazwisko)	Część, której dotyczy uwaga (proszę wskazać nr rozdziału lub wpisać Uwagi ogólne / Inne oraz podać nr strony)	Szczegółowe zagadnienie, którego dotyczy uwaga	Treść uwagi lub proponowany zapis
	Rozdział... Uwagi ogólne Inne Strona...		
EFET	Chapter 2.2, p. 27	<i>Tym samym, wodór może pełnić rolę swoistego magazynu energii.</i>	While we recognize P2X's potential to support the balancing of the electricity grid, we note that these are production facilities and their activity goes beyond peak RES production management. The economic viability of these devices may be low at the early stages of the technology's development, yet this is due to change over time. We therefore urge the Polish authorities to recognize that P2X operation is a commercial activity and as such it should not be developed under the roof of regulated entities.
EFET	Chapter 2.2, p.27	<i>Wykorzystanie elektrolizerów (w układach P2H/P2G/P2L/P2A/P2X) pozwoli na integrację systemu gazowego z siecią elektroenergetyczną w myśl koncepcji łączenia sektorów, doprowadzając do zmniejszenia zależności polskiej gospodarki od paliw kopalnych.</i>	EFET supports the goals of power and gas sector integration, as they have huge potential to optimize the size of the networks and the costs that they generate to the end consumers. Nonetheless, we would like to reiterate that P2G technologies should not be viewed exclusively as assets that facilitate the energy conversion between power and gas grids. These are production facilities and their product does not necessarily need to be injected into gas grids (be it blended gas grids or dedicated hydrogen grids). It is therefore important for the strategy to recognize the commercial side of their activities that goes beyond the balancing services they can provide to the system operators.
EFET	Chapter 2.2, page 28	<i>1. Setting up P2G installation with a</i>	EFET sees P2X operation as commercial activities that go beyond pure electricity network balancing and electricity storage (as per the two

		<p><i>capacity of 1 MW based on Polish technologies – in order to stabilise the distribution grids. Such installation will produce 3 150 MWh H2/year;</i></p> <p><i>7. Start using hydrogen as energy storage approx 4700 MWh of the Energy produced with 11 GWh of energy input;</i></p>	<p>comments above). Nonetheless, we recognize that for the sake of development of these technologies, pilot projects and R&D supports are necessary.</p> <p>We note that the strategy does not specify the parties responsible for achieving the targets 1 and 7 set forth under Goal 1 of the PSW2030. We support the approach of not pre-picking winners and awarding the projects to entities best equipped to develop them, yet we take this opportunity to signal that if the designated project promoters are regulated entities (TSOs, DSOs, SSOs), this should only be for the limited and necessary period of market kick-off, during which they would be responsible for building and technically operating and maintaining the P2G assets while the commercial decision regarding when and how much H2 to produce, the type of electricity used and the selling price) would be taken by market players through an auctioning of the capacity. Once the market kick-starts, TSOs, DSOs, SSOs should be obliged to step back from operating these assets and not allowed to compete with different commercial appliances as they may be faced with conflict of interests issues, notably with regard to network access/tariffs.</p> <p>We also note that an emphasis on “Polish technologies” may result in suboptimal solutions being applied and tested should it too narrowly reduce the scope of the supporting schemes.</p>
EFET	Chapter 2.2, p. 33	<p><i>Goal for low-carbon H2 production capacity of at least 50 MW by 2025 from:</i></p> <ul style="list-style-type: none"> <i>-electrolysis</i> <i>-biomethane, waste gas</i> <i>-natural gas + CCU/CCS</i> <i>-other ways of H2 production</i> 	<p>EFET appreciates that the strategy allows an open-ended list of technologies for low-carbon hydrogen production. We express our hopes that these technologies will be able to compete on a level playing field and have access to the similar level of support. As per our other comments to the PSW2030 throughout this document, we reiterate that hydrogen production is a competitive activity that by default should not be performed by regulated monopolies. Competition should be the preferred setting, as it contributes to economic efficiency.</p>
EFET	Chapter 2.2, p. 35	<p><i>Analysis of the existing grid’s ability to transport</i></p>	<p>EFET supports analysing the grid’s ability to transport blends of natural gas and hydrogen. At the same time, we highlight that this analysis needs to take account of the acceptable blend’s compatibility with neighbouring countries</p>

		<i>natural gas blended with H2</i>	in order to avoid gas market fragmentation. We therefore suggest that the PSW2030 explicitly mentions the need to coordinate the works on determining the acceptable percentage of hydrogen in the gas grids at EU level.
EFET	Chapter 2.2, pages 25-36	<i>GOs for renewable and low-carbon gases</i>	<p>We note that the envisaged legislative actions under the PSW2030 mention introduction of Guarantees of Origin (GOs) for hydrogen under the Polish Renewables Act, yet the Strategic Goals laid down in Chapter 2.2 make reference to neither these instruments nor other sustainability certificates in general. We believe that it is important for Poland to establish GOs for renewable and low-carbon gases that help recognizing these energy carrier's contribution to the decarbonization of the economy.</p> <p>Guarantees of origin for hydrogen and other renewable and low-carbon gases should have a format corresponding to the already existing and developed schemes around the EU and their registry should fully integrate with other EU registries, e.g. via AIB. This setup would help to achieve cross-border recognition and full tradability of the GOs issued in Poland, as well as the recognition of the Polish GOs in other EU Member States. A liquid EU market for renewable and low-carbon energy certificates should facilitate an additional revenue stream to the developing technologies without involving additional public funds and at the same time improve transparency for end-use consumer with regard to the energy mix of their consumption.</p>
EFET	Chapter 3.1, p. 38	<i>1. Amendments to the Energy Act – no licensing obligation until the market becomes sufficiently developed</i>	EFET believes that the EU acquis ensures an appropriate level of market integrity and transparency of trading activities and the Polish licensing obligations constitute a market entry barrier that makes no additional contribution towards consumer protection. We encourage the Polish authorities to consider lifting the licensing obligations for all energy trading activities envisaged under Art. 32 of the Energy Act.
EFET	Chapter 3.1, p. 38	<i>2. Amendments to the Energy Act – non-implementation of the unbundling principles</i>	We believe that the unbundling principles need to be retained for the development of the hydrogen market and these should be firmly laid down in the Energy Act early on. We recognize that some derogations may apply to certain pilot projects, but these should be awarded only in specific cases that serve the technology development and should be supplemented with a clear

		<i>until the market becomes sufficiently developed</i>	sunset clause so that they do not hinder the development of commercial activities.
EFET	Chapter 3.1, p. 38	<i>6. Amendments to the Renewables Act – need to implement RED II in terms of introduction of GOs</i>	Please refer to our comment on “GOs for renewable and low-carbon gases”