

# Flexibility Needs Assessment Checklist

As Distribution System Operators, Transmission System Operators and National Regulatory Authorities provide inputs towards and finalise the production of Flexibility Needs Assessments; Beyond Fossil Fuels and Climate Action Network Europe have compiled a checklist of best practice principles which should be used to guide the analysis. Download the the full **Flexibility Needs Assessment policy briefing here**

- ✓ **Prioritise clean flexibility over fossil gas.** In order to reap the benefits of cheap, clean, homegrown renewables – and boost energy security via ending dependence on fossil gas imports – it will be key for the Flexibility Needs Assessments (FNAs) to explicitly prioritise clean sources of flexibility over fossil gas. Key for success will include:
  - A commitment to adopt an ambitious clean flexibility target in line with EU and national climate and energy targets, via their obligation to define a national objective for non-fossil flexibility.
  - A commitment to publish a Clean Flexibility Policy Roadmap to scale-up batteries, long-duration energy storage, interconnection and demand side response, including the development of non-fossil flexibility schemes.
  - A comprehensive analysis of policy and market barriers for clean flexibility, such as capacity markets which prioritise flexibility from fossil gas.
  - “Hydrogen ready” gas plants should not be counted as clean flexibility until they have been converted to 100% renewable hydrogen, nor should CCS-fitted power plants.

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- ✓ **Use robust, independent and transparent data sources.** The targets and analysis which come out of FNAs will only be as strong as the data inputs that are fed into them, and the modelling methods that assess them. Key indicators for success will include:
  - Modelling assumptions that do not contain a bias favouring incumbent, fossil assets.
  - Use renewable and efficiency targets in modelling which reflect climate goals and on-the-ground advancements in the clean flexibility sector.
  - Transparent and reliable data sources and scenarios, and the use of open-source modelling; with coordination among national and European data sources.

✓ **Ensure an inclusive approach to clean flexibility to maximise benefits-sharing.**

The shift to a more flexible energy system should be designed in a way to ensure that market barriers are removed and the cost-saving benefits are spread in a socially-fair way.

- Consideration of energy tariffs that enable and incentivise households and businesses to share in the benefits of flexible energy use. This could also include redistributive approaches (like social tariffs) to ensure homes in energy poverty can also access the benefits.
- Measures to support a more socially inclusive approach to smart electrification – for example, supporting household measures like smart meters, home retrofits, and batteries in combination with solar PV.
- Consideration of how to better support projects that support community benefits – including social housing projects, energy communities and public buildings – to use energy flexibility; so it is not just large energy companies benefiting from support measures.

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✓ **Include a robust and climate-aligned understanding of electrification profile.**

A robust understanding of the energy demand side – such as heat pumps, electric vehicles, and industrial electrification – will be key to estimate the future possibility of flexibility measures like vehicle-to-grid and demand side response. While the electrification of heating, transport and industrial sectors will be a critical enabler of climate goals; over-hyped electricity demand projections for data centres could undermine progress towards emissions reductions. We will therefore look to ensure that Member States have properly considered these opportunities and challenges.

- FNAs should include a climate-aligned understanding of electrification of heating, transport and industrial sectors when considering future electricity demand.
- FNAs should properly consider the risks associated with overstating potential increases in electricity demand, particularly that related to growth in data centres and other significant load drivers, including electrolysers and industrial electrification.

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✓ **Cross-border coordination.** Better interconnectivity will be key to meet future energy demand in the cleanest, most efficient way. However, at present, many TSOs and governments have a tendency to fall back on national resources. Factors for success could include:

- Optimisation of cross-border clean flexibility opportunities to properly consider potential benefits and efficiency gains.
- Consideration of the 15% interconnection target and 70% cross-border energy target.
- Regional collaboration between TSOs and NRAs to inform FNAs.

Download the the full **Flexibility Needs Assessment policy briefing** [here](#).