

Preparation of a new Renewable Energy Directive for the period after 2020

Fields marked with * are mandatory.

Introduction

In its Energy Union Framework Strategy, the Commission announced a new renewable energy package for the period after 2020,[1] to include a new renewable energy directive (REDII) for the period 2020-2030 and an updated EU bioenergy sustainability policy. This consultation covers the REDII aspects. The bioenergy sustainability policy will be covered by a separate public consultation.

The results of this consultation, together with the results of the separate public consultation launched by the Commission in July 2015 concerning market design (available at <https://ec.europa.eu/energy/en/news/redesigning-europes-electricity-market-%E2%80%93-give-your-fee>) will inform the impact assessment for REDII.

Please, submit your response to this public consultation by 10 February 2016 at the latest. You are invited to reply to the questions in the questionnaire by using the link to the survey on DG ENER's consultation webpage or via EU Survey. Always use this questionnaire even if also other documents are submitted. In order to facilitate the Commission's processing of responses, please respond in English as far as possible.

Received contributions will be published on the Internet, unless a confidentiality claim has been made on reasonable grounds. Responses from non-registered organisations will be published separately. The Commission also intends to publish a document summarizing the main outcomes of this consultation.

[1] Commission Communication: A Framework Strategy for a Resilient Energy Union with a Forward-Looking Climate Change Policy (COM/2015/080 final) of 25 February 2015

Evaluation of current policies

As part of the Commission's better regulation agenda, the current renewable energy directive[1] (RED) was included in the Commission's 2013 REFIT programme and a comprehensive evaluation study of the RED was carried out in 2014 for the purpose of assessing its effectiveness, efficiency, relevance, coherence and EU added value and to obtain stakeholders' views on the impacts and benefits of the Directive.[2] The main findings were included in the 2015 Renewable Energy Progress

Report.[3] This public consultation builds on the REFIT evaluation and aims at obtaining additional information on impacts and benefits of the RED. Where appropriate, some of the questions in this questionnaire therefore also address evaluation of current policies.

[1] Directive 2009/28/EC of the European Parliament and of the Council of 23 April 2009 on the promotion of the use of energy from renewable sources and amending and subsequently repealing Directives 2001/77/EC and 2003/30/EC

[2] REFIT Evaluation of the Renewable Energy Directive (CE DELFT, 2014) available on:

https://ec.europa.eu/energy/sites/ener/files/documents/CE_Delft_3D59_Mid_term_evaluation_of_The_R

[3] COM (2015) 293, available at:

<https://ec.europa.eu/energy/en/topics/renewable-energy/progress-reports>

Context and challenges

In its Energy Union Framework Strategy, the Commission announced a new renewable energy package for the period after 2020,[1] to include a new renewable energy directive (REDII) for the period 2020-2030 and an updated EU bioenergy sustainability policy. This consultation covers the REDII aspects. The bioenergy sustainability policy will be covered by a separate public consultation.

The results of this consultation, together with the results of the separate public consultation launched by the Commission in July 2015 concerning market design (available at <https://ec.europa.eu/energy/en/news/redesigning-europes-electricity-market-%E2%80%93-give-your-fee>) will inform the impact assessment for REDII.

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[1] Directive 2009/28/EC of the European Parliament and of the Council of 23 April 2009 on the promotion of the use of energy from renewable sources and amending and subsequently repealing Directives 2001/77/EC and 2003/30/EC

The core objectives of the EU Energy Union Framework Strategy[1] are to develop a long-term, secure, sustainable and competitive energy system in the EU. Europe should also be a leader in renewable energy. For this, it is important to continue to increase the share of renewable energy sources in the EU.[2] The RED ensures that all Member States will contribute to reaching 20%

renewables at EU-level by 2020. In October 2014, the European Council agreed that **at least 27%** share of renewables by 2030 would reflect a cost-optimal way of building a secure, sustainable and competitive energy system (alongside an at least 40% domestic GHG emissions reduction target and the at least 27% energy efficiency target, which is to be reviewed by 2020, having in mind an EU level of 30%).

As the current legislation will not be sufficient for this purpose^[3], there is a need to modify the legislative framework to ensure a timely and cost effective achievement of the EU level binding target on renewables by 2030. A combination of different factors will need to be addressed, including:

- **General approach:** The existing policy framework does not address uncertainties with regard to national policies, governance and regional cooperation to ensure a timely and cost effective target achievement for the period after 2020.
- **Empowering consumers:** A lack of consumer empowerment and incomplete information on renewable energy solutions can hinder cost-optimal deployment of renewable energy at city and community level.
- **Decarbonising the heating and cooling sector:** In the heating and cooling sector, which represents almost half of the EU energy consumption, the current regulatory environment in combination with a lack of information does not incentivise cost-optimal deployment of renewables in heating, cooling and hot water use. The sector remains dominated by fossil fuels and therefore dependent on imports.
- **Adapting the market design and removing barriers:** The current regulatory environment does not properly reflect externalities of energy production in market prices, including environmental, social, innovation and economic externalities. Together with persistent and distortive fossil fuel subsidies,^[4] this is one of the reasons leading to high capital costs that hinder cost-optimal renewable energy deployment. In addition, a lack of market integration, infrastructures (storage, interconnections) and smart solutions, including demand-response, also hinder cost-optimal deployment of renewable energy. Finally, complex administrative procedures for renewable energy deployment at national and local level have not yet been eliminated. This covers, inter alia, permitting and grid connection procedures^[5].
- **Enhancing renewable energy use in the transport sector:** A policy fostering the use of sustainable alternative renewable fuels would contribute to decarbonising the transport sector and reducing risks related its fossil fuel dependency and could remove current market distortions and fragmentations observed in particular in the internal market for biofuels. Despite the progress made with regard to the development of alternative renewable fuels such as advanced biofuels and renewable fuels of non-organic origin, commercial deployment of such products in the EU is lagging behind. The main reason is the perceived uncertainty about the policy framework after 2020. Only a few Member States have adopted dedicated support measures for advanced biofuels, while most have focussed on more traditional biofuels. The potential for electric transport using renewable electricity deployment is still untapped, due to still high technology costs of deployment and lack of necessary infrastructure.

[1] Commission Communication: A Framework Strategy for a Resilient Energy Union with a Forward-Looking Climate Change Policy (COM/2015/080 final) of 25 February 2015

[2] As highlighted in the 2030 climate and energy framework (COM(2014) 15 final)

[3] As highlighted in the baseline scenario of the 2030 climate and energy framework (COM(2014) 15 final)

[4] Estimated by IMF to be 330 Billion Euro in 2015, source:
<http://www.imf.org/external/pubs/ft/survey/so/2015/new070215a.htm>

[5] Without prejudice to international and Union law, including provisions to protect environment and human health.

Part 1: Information about the respondent

* Are you responding to this questionnaire on behalf of/as:

- Individual
- Organisation
- Company
- Public Authority
- Other

* Name of the company/organisation

Energy Cities

* Please describe briefly the activities of your company/organisation and the interests you represent

Energy Cities is the the European Association of Local Authorities in Energy Transition, we represent the interests of around 1000 energy-conscious cities across Europe. Our members rethink the way they use and produce resources to foster local development and bring citizens on board the new reality of energy democracy.

* Please enter your email address

alix.bolle@energy-cities.eu

* Are you registered with the EC transparency register?

- Yes
- No

* Which countries are you most active in?

- Austria
- Belgium
- Bulgaria
- Croatia

- Cyprus
- Czech Republic
- Denmark
- Estonia
- Finland
- France
- Germany
- Greece
- Hungary
- Ireland
- Italy
- Latvia
- Lithuania
- Luxembourg
- Malta
- Netherlands
- Poland
- Portugal
- Romania
- Slovakia
- Slovenia
- Spain
- Sweden
- United Kingdom
- Other

* Can we publish your answers on the Commission website?

- YES - under my name (I consent to all of my answers/personal data being published under my name and I declare that none of the information I have provided is subject to copyright restrictions).
- YES - anonymously (I consent to all of my answers/personal data being published anonymously and I declare that none of the information I have provided is subject to copyright restrictions).
- NO - please keep my answers confidential (my answers/personal data will not be published, but will be used internally within the Commission)

Part 2: General approach

The RED sets an EU target for renewable energy in gross final energy consumption of 20% by 2020 and 10% of the final energy consumption in transport. In order to achieve the overall 20% target, mandatory national targets for 2020 are fixed for each Member State. The RED also obliges Member States to prepare National Renewable Energy Action Plans (NREAPs) and biannual progress reports to create transparency and predictability for investors and facilitate monitoring of progress towards target achievement. The European Council has reiterated several times that the 2020 targets need to be fully met[1].

For the period after 2020, binding national targets are replaced by a binding EU-level target of at least 27% renewable energy in final energy consumption by 2030 without sectorial targets or binding targets at national level. A new approach to target achievement therefore needs to be developed, building on the Energy Union Governance and Member States' national energy and climate plans for the period up to 2030, which are expected to include national contributions towards the EU-level renewable energy target.

Without putting into question Member States' flexibility with regard to meeting their greenhouse gas reduction targets in the most cost-effective manner in accordance with their specific national circumstances, energy mixes and capacities to produce renewable energy, the new Energy Union Governance will need to provide sufficient transparency and reliability, predictability and stability to spur renewable energy investments and allow access to low-cost capital. It will also need to enable the EU to compare and monitor progress towards the renewables target. Within the broader context of the development of the Energy Union Governance, it will need to be considered what type of governance system will be able to deliver on these renewable energy objectives.

Given that the renewable energy target for 2030 is binding on the EU as a whole, the European Commission will need to have means to ensure that this target is met in a sustainable and cost-effective way. For this purpose, EU measures could be put in place and be designed to deliver on a number of objectives of the Energy Union:

1. create a market-based environment in which renewables can attract the required investments cost-efficiently;
2. foster regional cooperation and regional projects;
3. empower consumers to deploy cost-optimal renewable energy solutions;
4. incentivise the roll-out of new and innovative technologies; and
5. ensure that any potential gap arising in reaching the at least 27% renewable energy target, in terms of either ambition or delivery, is filled.

A number of questions would arise in this respect, including under what circumstances EU measures could be used or activated, how to share potential costs in a fair and equitable way and how to ensure participation by all Member States.

The experience gained with support schemes so far has allowed developing more cost-effective and market-based support schemes. Some Member State support schemes did not respond sufficiently rapidly to falling technology cost development, which resulted in some cases in unnecessary increasing costs for consumers. The EU Energy and Environment State Aid Guidelines build on this experience and puts down conditions for the approval of State Aid. In this context an improved functioning energy market, with improved price signals, as well as a strengthened EU ETS shall improve the investment signal. At the same time it is reasonable to expect that support schemes and other incentives (financial and regulatory) will still be the main policy tools that Member States will use to implement their renewable energy objectives with respect to renewable technologies that are not yet able to be fully financed by the internal energy market.

For new and innovative technologies, it can be important to ensure that regulatory and market risks are reduced to allow that project promoters can bring down costs through technology learning and industrialisation of manufacturing and installation, in particular if the EU is to become a world leader in renewable energy. However, where possible, some degree of market integration should remain if this goes beyond mere initial technology deployment of innovative technologies, to ensure their development takes into account market needs, does not lead to overcompensation and prepares these technologies for further market integration.

Finally, in line with the broader objectives of the Energy Union, a new regional approach to renewable energy policy cooperation and incentives should be considered.

In this context, it is important to examine the optimal geographical scope and design of any support schemes in order to drive the achievement of the 2030 target in a cost-effective way, which does not lead to fragmentation and distortion of the internal energy market.

It also needs to be assessed how regional cooperation agreements similar to those developed under RED can be improved and could play a role and to what extent support at EU-level could become relevant.

[1] The latest Renewable Energy Progress Report issued in June 2015 concluded that the majority of Member States are currently on track to meeting their 2020 renewables target. In 2013, the combined EU share of renewable energy reached 15% and the estimate for 2014 indicates a 15.3% share, which is above the trajectory for the EU as a whole. 26 Member States met their first 2011/2012 interim target and 25 Member States are expected to meet their 2013/2014 target. Some Member States have already reached their 2020 targets. However, as the trajectory towards the 2020 target becomes steeper over the coming years up to 2020, some Member States may need to intensify their efforts to keep on track (COM(2015)293 final and SWD(2015)117 final). Available here: <https://ec.europa.eu/energy/en/topics/renewable-energy/progress-reports>).

1. To what extent has the RED been successful in helping to achieve the EU energy and climate change objectives?

- Very successful
- Successful
- Not very successful
- Not successful
- No opinion

To what extent did implementation measures for the RED as well as external factors (technological development, financial crisis, security of supply concerns and related market interventions) affect the effectiveness and efficiency of achieving the objectives?

Please identify and ideally also quantify the direct and indirect costs and benefits such as macroeconomic effects, competitiveness effects, innovation, cost and cost reductions, environmental and health effects of the Renewable Energy Directive.

3600 character(s) maximum

The RED has provided a crucial framework and impetus for Member States to enact ambitious national policies, programmes and support schemes. Without the RED-mandated national binding targets for RES and the feed in tariff systems that ensued, we would be nowhere near we stand now, especially in terms of technology penetration / development and related job creation. Half a million jobs have been created over the last five years for renewable energy installations, carrying - especially when related to maintenance - the advantage of not being "outsourcable" and contributing to local economic development objectives notably through large SMEs engagement.

However, although renewable policy made its way through the internal market door, now is the time to link it to a greater extent to the Treaty objectives

of social and territorial cohesion, by guaranteeing a level playing field for the emergence of local energy companies, RES cooperatives and other forms of community energy. Last but not least, while the previous RED kept a narrow focus on electricity demand and supply, REDII should better integrate the objectives of the Heating and Cooling Strategy.

2. How should stability, transparency and predictability for investors be ensured with a view to achieving the at least 27% renewable energy target at EU level? Please indicate the importance of the following elements:

	Very important	Important	Not very important	Not important	No opinion
Forward looking strategic planning of RES development is required by EU legislation	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Best practice is derived from the implementation of the existing Renewable Energy Directive	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Regional consultations on renewable energy policy and measures are required	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Member States consult on and adopt renewable energy strategies that serve as the agreed reference for national renewable energy policies and projects	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The Commission provides guidance on national renewable energy strategies	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Any other view or ideas? Please specify. What are the lessons from the RED (mandatory national targets, national plans, progress reports etc.)?

3600 character(s) maximum

The EU was part of a “Coalition of the Willing” in Paris at the COP21 and now has to translate its commitments into concrete action. In the revised RED, the outcome of the Paris agreement and the need for strong climate action should be reflected. The revised RED should take all means necessary to contribute to this goal. This includes:

- Set national binding targets

The revised RES for 2020–2030 should keep the nationally binding targets – clear and binding targets provide visibility and stability to investors and act as de-risking lever. They also set the ground for local authorities, NGOs

and the civil society to hold MS into account.

- Stable, long term framework specifically targeting the development of small and medium-sized projects

Local authorities, private individuals, citizen cooperatives and SMEs investing in RES projects cannot bear the same risk level than large energy companies, more able to cope with the transaction costs linked to price volatility. Community energy is one of the most successful way to favour social acceptance of renewable energy projects (see results from the EU Wise Power project and ULG article "What drives the development of community energy in Europe?"), therefore a stable, long term framework specifically targeting the development of small and medium-sized projects must be required to MS, through a strong dialogue with the regional and local level. Cities need a long-term, clear and forward-looking RES policy strategy from their MS to drive investment in RES. Such a strategy is currently missing in several MS like the Netherlands or Czech Republic. The national RES plans should take into account RES deployment on the local level, which can be ensured for instance through the framework of the successful cities' movement Covenant of Mayors.

- Set mechanisms that allow the Commission to intervene when MS enact damaging retroactive policy changes to their RES framework

While the current RED has had positive effects on upscaling RES in the EU, it has not done enough to counteract the strong downward trend in RES investments recently observed. While global players like China or India are continuing massively investing in RES, thereby contributing to a global RES investment boom, in the EU investment in RES has fallen by 18% between 2014 and 2015. This is due e.g. to retroactive policy measures in MS like Spain ("solar tax") or the slashing of RES subsidies in the UK. Key EU countries like France (minus 53%) or Germany (minus 42%) have seen RES investment plummet. Therefore the revised RED should have mechanisms (such as infringement procedures) that allow the Commission to intervene when MS enact in damaging retroactive policy changes to their RES framework.

- Mandatory biannual progress reports

MS should regularly report - at least on a biannual basis - on their RES progress and the Commission should closely monitor and analyse these reports to highlight problematic issues as well as good practice stories. Moreover, the revised RED should provide a coherent, detailed and concise template for planning and reporting.

3. Please rate the importance of the following elements being included in Member States' national energy and climate plans with respect to renewable energy in ensuring that the plans contribute to reaching the objectives of at least 27% in 2030.

	Very important	Important	Not very important	Not important	No opinion

Long term priorities and visions for decarbonisation and renewable energy up to 2050	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
In relation to national/regional natural resources, specific technology relevant trajectories for renewable energy up to 2030	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Overview of policies and measures in place and planned new ones	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Overview of renewable energy trajectories and policies to 2050 to ensure that 2030 policies lie on the path to 2050 objectives	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Qualitative analysis	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Trajectories for electricity demand including both installed capacity (GW) and produced energy (TWh)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Measures to be taken for increasing the flexibility of the energy system with regard to renewable energy production	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Plans for achieving electricity market coupling and integration, regional measures for balancing and reserves and how system adequacy is calculated in the context of renewable energy	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please explain.

3600 character(s) maximum

A long-term perspective is paramount in MS' NECPs so that the EU achieves decarbonisation and 100% RES by 2050. MS should include a phase-out scenario for fossil fuel production sources in order to create a pathway towards full decarbonisation and 100% RES by 2050. The energy infrastructure has to be designed accordingly to accommodate the increasing volume of renewable energy in the system. This is best achieved by moving away from a top-down, large-scale, centralized energy system towards a decentralized, locally strongly grounded energy system that is based on small and medium-scale RES installations in cities and communities. There should also be a fully holistic approach to the energy system. This means the inclusion of not only trajectories for electricity demand, but also for heating and cooling demand.

NECPs by MS should use a bottom-up approach where renewable energy policy on

the regional and local level informs and co-designs the national plan, and regions/cities are partners on an equal footing with MS. To provide a very concrete example, 12% of gas consumption in the Netherlands could be saved if the country fully tapped the waste heat from the Rotterdam port, a project currently under development. There is an ever-growing list of other such untapped opportunities everywhere across Europe, which justify a “think local first” approach to national energy planning. Indicators in the NECP template should reflect this dimension, requiring MS to report on the consideration given to local Covenant of Mayors SEAPs for example, and the extent to which they have supported the development of energy maps (identifying for each territory the RES supply potential and the energy demand per site in terms of heating, cooling and electricity). With this in mind, the European Commission should centre its efforts not only on “WIDENING” (planned guidance paper on cross-border cooperation) the Energy Union, but also on “DEEPENING” it through the integration of regional and local priorities and potential. A guidance paper is also needed on this second, equally crucial topic.

4. What should be the geographical scope of support schemes, if and when needed, in order to drive the achievement of the 2030 target in a cost-effective way?

- Harmonised EU-wide level support schemes
- Regional level support schemes (group of Member States with joint support scheme)
- National support schemes fully or partially open to renewable energy producers in other Member States
- Gradual alignment of national support schemes through common EU rules
- National level support schemes that are only open to national renewable energy producers

Please explain.

3600 character(s) maximum

Until all RES producers - which particularly includes cities, citizens or SMEs - are enabled in all MS to compete on an equal footing with other market players (whether subsidized fossil fuel infrastructures or large, centralised renewable energy projects), feed in tariffs for small to medium scale installations should be maintained to guarantee a level playing field. Investment in RES is an investment in the present and future quality of life of European citizens, as it e.g. enables the creation of local jobs, favours social acceptance, reduces harmful air pollution and contributes to energy efficiency on territories. MS should be allowed to design flexible support schemes that strengthen and enable local RES investments by local authorities, citizens or local and regional ESCOs. From a wide set of interviews conducted across Europe with its member cities, Energy Cities found that the most appropriate support scheme for community energy projects to emerge are feed in tariffs, which should be maintained or introduced (e.g. Ireland) in all member states for such small and medium-sized projects. This is all the more relevant when recent research has showed that the move to market-based mechanisms in several MS has corresponded to a sharp decrease in the creation/survival of cooperatives and community energy projects, especially considering price volatility is perceived as a bigger risk by ordinary citizens. Given that

such projects are community-oriented and of collective benefits, there is no risk of overcompensation and there is the additional benefit of removing the costly barrier of social acceptance. In addition, current market conditions (low energy prices) mean that RES deployment cannot be driven through a market-predominant approach. Last but not least, in its guidance to MS, the European Commission should make clear that no obstacle should stand in the way of local or regional support schemes that are more ambitious than those set at national level.

5. If EU-level harmonised /regional support schemes or other types of financial support to renewable energy projects would be introduced:

- What hinders the introduction at the EU wide and/or regional scale?
- How could such mechanism be activated and implemented? What would be their scope (what type of projects/technologies/support mechanisms could be covered)?
- Who would finance them?
- How could the costs of such measures be shared in a fair and equitable way?

3600 character(s) maximum

The Commission should monitor and if needed enforce infringement procedures should MS engage in retroactive support scheme changes that endanger the EU reaching the 2030 RES goal.

6. The current Renewable Energy Directive gives Member States the possibility to enter into various cooperation mechanisms (statistical transfers, joint projects and/or joint support schemes). Please expand on the possible new legislative and non-legislative measures that could be introduced to foster the development of cooperation mechanisms in the period beyond 2020.

3600 character(s) maximum

7. The use of cooperation mechanisms has been limited to date. Which of the below factors do you consider important in explaining the limited recourse by Member States to cooperation mechanisms so far?

	Very important	Important	Not very important	Not important	No opinion
Unclear legal provisions	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Administrative complexities	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Lack of cost-effectiveness / uncertain benefit for individual Member States	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Government driven process, not market driven	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Member States reluctant to see their taxpayers/ consumers' money used for investments outside their country	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Other? Please explain.

3600 character(s) maximum

8. How could renewable electricity producers be fully or partially eligible for support in another Member State? Which elements would you include in a possible concrete framework for cross-border participation in support schemes? Any other consideration? Please explain.

3600 character(s) maximum

9. Please assess what kind of complementary EU measures would be most important to ensure that the EU and its Member States collectively achieve the binding at least 27% EU renewable energy target by 2030:

	Very important	Important	Not very important	Not important	No opinion
EU-level incentives such as EU-level or regional auctioning of renewable energy capacities	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
EU-level requirements on market players to include a certain share of renewables in production, supply or consumption	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
EU-level financial support (e.g. a guarantee fund in support of renewable projects)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
EU-level support to research, innovation and industrialisation of novel renewable energy technologies	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Enhanced EU level regulatory measures	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

Any other ideas or comments, please explain.

3600 character(s) maximum

Complementary EU measures should not incentivize MS to rely on the EU to fill "gaps" to achieving the RES target in 2030 and full decarbonisation by 2050, but should enable structural changes to remove all remaining administrative, technical and political barriers that stand in the way of RES deployment driven by cities and citizens.

Through its proposals on market design, Energy Union governance and other key legislation in the framework of the Energy Union in 2016, the EU should lead to a design of an energy market in the EU that is fully suitable to increased deployment of RES driven by the local level and deliver energy savings. Through its SET Plan, the EU should support innovation in RES technologies that are fit for small-scale generation by cities and citizens.

10. The Energy Union Framework Strategy sets the ambition of making the European Union the global "number one in renewables". What legislative and non-legislative measures could be introduced to make/strengthen the EU as the number one in renewables? Has the RED been effective and efficient in improving renewable energy industrial development and EU competitiveness in this sector?

3600 character(s) maximum

To make the EU number one in renewables in an increasingly competitive global RES market, the Energy Union should be true to its words: "Citizens are empowered to take ownership of the energy transition". The current RED has provided a foundation to boost RES in the EU, but the revised RED should go one step further and introduce the following measures to make the EU the number one in renewables:

- Enable true citizen/community ownership of local RES projects

The revised RED should include a provision requiring MS to introduce a legal obligation for developers to open the capital and governance of RES projects to citizen or local authorities' participation. This means not only financial ownership to benefit from RES projects on their home territory (e.g. such as in Denmark where 20% of capital in certain local wind projects is owned by citizens), but more importantly through full participation in the decision making process for new local RES projects. An EESC study in six MS has shown that if citizens and civil society are included as equal partners in local RES projects, they are fully supportive for its deployment and are on board to drive the energy transition on their territory.

- Include target-based objectives and legal dispositions for the development of community/municipal energy

The right to establish a citizen-led energy production unit (e.g. cooperative) and a municipal energy company should be legally defined in a new chapter on community/municipal energy in a revised RED, which should be assorted with target-based objectives on the model of Scotland (500MW of community energy commitment by 2020). Although the added value of municipal energy companies in EU MS like Germany and Scandinavian countries is widely acknowledged and despite the fact that "stadtwerke" and other municipal energy companies are keen to share their experience with EU neighbours, it is still impossible for

cities in certain MS to follow this model.

In addition to this, the new chapter on municipal/community energy should include a binding obligation for MS to support the development of local one-stop shops in charge of assisting and approving community RES projects, and making RES investments more accessible to citizens not having to deal with multiple permits and lengthy administrative procedures. This one-stop shop should be created at the local or regional level which is closest to the people. Where they exist, local or regional energy agencies, through their extensive knowledge of the local energy dynamic, are best placed to take up this role. By doing these measures, crucial steps are taken to harvest and tap into the full local RES potential that in return can propel the EU towards becoming number one in renewables, reducing its dependence on energy imports and the need for costly infrastructure, and last but not least: contributing to social acceptance which mega RES projects from multi-national companies is less likely to favour.

Part 3: Empowering consumers

The European Commission's Energy Union Strategy put the consumer at the centre stage. Consumers have a key role to play in energy markets and in driving the transition to a more sustainable energy system in the EU. On 15 July 2015, the Commission issued a Communication on delivering a new deal for energy consumers (COM/2015/339)[1] as well as a guidance document on best practices on renewable energy self-consumption (SWD/2015/ 141).[2] In this context, REDII provides opportunities to develop more targeted measures for empowering consumers, including communities and cooperatives[3].

As active participants in the energy market, consumers should be able to self-consume and store renewable energy in the EU.

Provisions on simplified and streamlined procedures on permitting and grid connection in case of projects for self-consumption of renewable energy could be further enhanced.

The wide-spread development of self-consumption may also require gradual adjustment of retail tariffs to promote consumers' flexibility, while supporting energy efficiency and the renewable energy objectives and at the same time minimise total system costs. The establishment of common principles at EU-level for network tariff design will thus need to be considered.

Renewable energy deployments need also to observe certain rights granted to the public, by international and EU law, such as, for instance, the right to access to information, public participation and consultation, as well as access to justice on environmental matters[4]. Thus, contributing to accountability, transparency and public awareness.

The REDII also offers opportunities to foster local ownership of renewable energy (e.g. community and citizen participation in renewable energy cooperatives). It seems particularly important to support local authorities in preparing strategies for the promotion of renewable energy, enable cooperation between relevant actors at the local or municipal level and facilitate access to finance.

Under the RED, a Guarantees of Origin (GO) system provides an EU wide mechanism to inform electricity consumers as to the renewable nature of the electricity that they use, enabling green tariffs to develop but also being criticised for not sufficiently linking these tariffs to real incentives for

additional new green energy deployment. It should be assessed to what extent the current rules for electricity disclosure (incl. GO) can be improved to reflect best practice in Member States' implementation and help consumers choose a more sustainable energy consumption pattern.

[1] https://ec.europa.eu/energy/sites/ener/files/documents/1_EN_ACT_part1_v8.pdf

[2]

http://ec.europa.eu/energy/sites/ener/files/documents/1_EN_autre_document_travail_service_part1_v6.pdf

[3] Without prejudice to the EU and international law on the right to access to information, public participation and consultation, as well as access to justice on environmental matters.

[4] UNECE Convention on access to information, public participation in decision-making and access to justice in environmental matters (Aarhus Convention), Directive 2011/92/EU, as amended by Directive 2014/52/EU (EIA Directive), Directive 2001/42/EC (SEA Directive).

11. How would you rate the importance of the following barriers for consumers to produce and self-consume their own renewable energy?

	Very important barrier	Important barrier	Not very important barrier	Not important barrier	No opinion
Self-consumption or storage of renewable electricity produced onsite is forbidden	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Surplus electricity that is not self-consumed onsite cannot be sold to the grid	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Surplus electricity that is not self-consumed onsite is not valued fairly	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Appliances or enabler for thermal and electrical storage onsite are too expensive	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Complex and/or lengthy administrative procedures, particularly penalising small self-consumption systems	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Lack of smart grids and smart metering systems at the consumer's premises	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The design of local network tariffs	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The design of electricity tariffs	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Other? Please explain.

3600 character(s) maximum

According to the treaty on the functioning of the European Union, “the Union shall develop and pursue its actions leading to the strengthening of its economic, social and territorial cohesion”. In light of this, mechanisms should be introduced to support the development of community energy and cooperatives in particular, not only self-generation and self-consumption.

The revised RED should bring with it simplified administrative procedures, strengthening article 13 of the current RED. There should be simple notification procedures for smaller local RES systems and authorization for a new local RES project should take maximum three months, in order to reduce the administrative cost burden on citizens willing to invest capital in RES generation.

12. In general, do you think that renewable energy potential at local level is:

- Highly under-exploited
- Under-exploited
- Efficiently / fully exploited
- Over-exploited (i.e. beyond cost-effectiveness)
- No opinion

Other? Please explain. Has the RED been effective and efficient in helping exploiting the renewable energy potential at local level?

3600 character(s) maximum

Whereas MS such as Denmark, Germany or Austria used the current RED to allow for the proliferation of local RES (e.g. in Germany almost half of RES generation comes from cooperatives), there were others like Spain and the UK where detrimental, retroactive national policies (e.g. solar tax) put a grinding halt to the mushrooming of local RES.

To a certain extent, the current RED has helped in pushing local RES notably through feed in tariffs, but there is still much more to be done and the revised RED should address this. The Commission should establish stronger links (simultaneity) between smart grid deployment and support to community RES projects to avoid public opposition backlash to infrastructure development, one of the costlier obstacles to the energy transition; through this, it would take a step forward in reconnecting the citizens with the European project in an era of remoteness and anonymity from decisions imposed in a top-down manner.

Using the vastly untapped potential of the structural funds, the EU Commission should create a “Community Power Facility” - as the logical addition to the “Connecting Europe Facility” already in place, to give a strong push to local RES across the European territory. The Commission should also encourage MS to create national revolving energy transition funds, which can be used to invest in local RES projects. All these measures would be an important step towards fully tapping into the local RES potential and make the EU number one in renewables.

13. How would you rate the importance of the following barriers that may be specifically hampering the further deployment of renewable energy projects at the local level (municipalities and energy cooperatives):

	Very important barrier	Important barrier	Not very important barrier	Not important barrier	Not important barrier	No opinion
Lack of support from Member State authorities	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Lack of administrative capacity and/or expertise/ knowledge/information at the local level	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Lack of energy strategy and planning at local level	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Lack of eligible land for projects and private property conflicts	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Difficulties in clustering projects to reach a critical mass at local level	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Lack of targeted financial resources (including support schemes)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>



Other? Please explain.

3600 character(s) maximum

To address the issue of a lack of targeted financial resources for community and municipal RES projects, specific mechanisms such as power purchase agreements for instance should be further developed and promoted to value renewable energy. The revised RED should assign a more prominent role to municipal and community energy, by defining through a bottom-up process in the Energy Union governance ambitious regional or local targets for community RES projects, such as is the case in Scotland already.

Grid access and connection procedures, which poses still a large problem for cooperatives in many MS, should be facilitated - this means fair division of grid connection costs according to how far the connection point is away from the installation, transparent and swift grid connection procedures, enabling local authorities to take back ownership of the local grid, maintaining, ensuring and enforcing priority access to the grid for RES projects in all MS.

14. Please rate the appropriateness of stronger EU rules in the following areas to remove barriers that may be specifically hampering the further deployment of renewable energy projects at the local level:

	Very appropriate	Appropriate	Not very appropriate	Not appropriate	No opinion
Promoting the integration of renewable energy in local infrastructure and public services	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Supporting local authorities in preparing strategies and plans for the promotion of renewable energy	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Facilitating cooperation between relevant actors at the local or municipal level	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Facilitating access to targeted financing	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
EU-wide right to generate, self-consume and store renewable electricity	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Measures to ensure that surplus self-generated electricity is fairly valued	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Harmonized principles for network tariffs that promote consumers' flexibility and minimise system costs	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Other? Please explain.

3600 character(s) maximum

In the upcoming proposal for an electricity market design, the EU Commission should also revamp the network codes to make them simpler to understand for citizens and cities. In the grid tariff design guidance provided by the Commission, fixed charges should be as low as possible, as they limit citizens' and cooperatives' options in investing in local RES projects.

The revised RED should also enhance the autonomy of local authorities when it comes to local RES deployment on their territory, which means clear, transparent and facilitative rules on setting up municipal energy companies in every MS and enabling local authorities to take back ownership of the local grid.

15. Should the current system for providing consumers with information on the sources of electricity that they consume be further developed and improved?

If not, why? If yes, how?

Should the current Guarantees of Origin (GO) system be made the mandatory form of information disclosure to consumers?

Should other information, such as e.g. CO2 emissions be included?

Should it be extended to the whole energy system and include also non-renewable sources? Other ideas?

To what extent has the current GO system been successful in providing consumers with information on the sources of electricity that they consume?

3600 character(s) maximum

Part 4: Decarbonising the heating and cooling sector

Renewable heating and cooling can make a real difference for the decarbonisation of the EU economy and enhance EU security of supply. While cost-effective renewable energy equipment is available, 80-90% of the EU heat and hot water production is still using largely imported gas and oil. The RED includes limited provisions for the promotion of renewable heating and cooling. In REDII, more targeted measures could be considered to further increase renewables deployment in the heating and cooling sector, building on and interacting with energy efficiency and security of energy

supply legislation. A comprehensive approach could be developed targeting buildings, individual energy use for heating and cooling, and the share of renewable energy in district heating and CHP units.

Efficient ways need to be found to stimulate switching from fossil fuels to renewable heating and cooling and hot water generation in the large number of EU homes with individual heating equipment. The existing nearly-zero energy building (NZEB) standards (mandatory from 2021 for all new building) include obligations for minimum use of renewable energy. It appears however that this is insufficient to further encourage the use of renewables at the building level. It could therefore be considered whether the NZEB rules should be made more ambitious to also include an obligation to use renewable energy heating (including water heating) and cooling in the existing building stock, effective if and when the building is subject to major renovation or the heating system is replaced. Measures will also need to encourage a shift in consumer behaviour, perhaps through better information about renewable energy alternatives from heating equipment suppliers and installers, and encourage investment in energy storage and demand-shifting capacity.

Although district heating systems only cover 13% of the European heat market, in Nordic, Central and Eastern European Member States 50-80% of the heating is produced by district heating. Most of this heating is produced from imported natural gas, followed by coal, and renewables. In these Member States, measures to increase the share of renewable energy in heating and cooling supply could bring significant gains. For example, it could be assessed whether, based on comprehensive assessments of national heating and cooling potentials, energy suppliers could potentially be required to progressively increase the share of renewable energy in the overall energy that is placed on the market for heating and cooling purposes, taken into account the market incentives already available for this sector. It could also be assessed whether all new and significantly upgraded heating and cooling infrastructure should enable at least a certain share of all heating, cooling and hot water needs to be sourced from renewable energy sources produced on site or nearby (through local networks).

The potential for renewable energy in decarbonising the heating and cooling sector will also be addressed within the forthcoming Heating and Cooling Strategy and Security of Energy Supply proposals, while sustainability aspects will be addressed through the post-2020 EU bioenergy sustainability policy.

16. Please rate the importance of the following barriers in hampering the deployment of renewable heating and cooling in the EU:

	Very important barrier	Important barrier	Not very important barrier	Not important barrier	No opinion
Real or perceived incoherence in existing EU policies (such as RED, EED and EPBD)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Lack of administrative capacity and/or expertise/ knowledge/information at the national and local level	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Lack of energy strategy and planning at the national and local level	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Lack of physical space to develop renewable heating and cooling solutions	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Lack of requirements in building codes and other national or local legislation and regulation to increase the share of energy from renewable sources in the building sector	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Heating and cooling equipment installers lack sufficient knowledge or information to offer renewable energy alternatives when asked to replace fossil fuel heating and cooling equipment	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Lack of targeted financial resources and financing instruments	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Lack of definition and recognition of renewable cooling	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Lack of electricity market design supporting demand response, decentralised energy and self-consumption and thermal storage in buildings and district systems	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Lack of mapping tools to identify the resources potential at regional scale with local renewable energy	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Lack of tools and information to compare the lifecycle costs of the various alternative heating and cooling alternatives	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Negative public perception	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

Other? Please specify and explain.

3600 character(s) maximum

In the revised RED, the Heating & Cooling Strategy from the Commission should be taken into full account. The Heating & Cooling Strategy foresees that local authorities will be supported in promoting RES in Heating & Cooling. In the revised RED, it should be therefore stated that EU structural funds will be used to fund an energy expert in cities where one is needed so that the capacity of cities is built to map and tap into their full local RES heating

and cooling potential. In addition to this, peer-to-peer learning between local authorities authorities in terms of upscaling local renewable heating and cooling projects on their territories should be facilitated and upscaled. Thirdly, the revision of the ETS in the framework of the Energy Union, in particular the modernization fund for central and Eastern European countries, should be used to exploit the vastly untapped potential of renewable district heating in these countries.

17. Please rate the most effective means of addressing these barriers and advancing the decarbonisation of EU heating and cooling supply:

	Very effective	Effective	Not very effective	Not effective	No opinion
Renewable heating and cooling obligation	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Requirement for energy suppliers and/or distributors to inform consumers of the costs of heating and cooling and to offer renewable heating and cooling solutions	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Requirement that all urban and municipal infrastructure upgrades (energy infrastructures, and other relevant infrastructure, such as sewage water, water and waste chains) make it possible and promote the distribution and use of renewable energy for heating and cooling and hot water generation	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Measures supporting best practices in urban planning, heat planning, energy master planning, and project development	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Criteria and benchmarks for promoting district heating and cooling taking into consideration the local and regional conditions	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Nearly zero-energy building (NZEB) standards to include a mandatory minimum use of renewable energy	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Including systematically renewable energy production in buildings' energy performance certificates	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The promotion of green public procurement requirements for					

renewable heating & cooling in public buildings	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Heating and cooling equipment installers should present renewable energy alternatives when asked to replace fossil fuel heating and cooling equipment	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Develop best practices for enterprises, including SMEs, to integrate renewable heating and cooling into their supply chains and operations	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Requirement to consider renewable energy alternatives in subnational, national, regional or EU security of supply risk preparedness plans and emergency procedures	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Targeted financial measures	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Other? Please specify and explain. How could such measures be designed? How could they build on existing EU rules?

3600 character(s) maximum

Clearer links should also be made between the energy efficiency potential of local renewable heating and cooling in a revised RED, that links to the revised EED. In addition to this, the Commission should introduce trajectories for RES heating and cooling demand in the EU, such as is done already for RES electricity demand, in order to ensure better coherence between the different energy sources.

The questionnaire's line "Requirement that all urban and municipal infrastructure upgrades (energy infrastructures, and other relevant infrastructure, such as sewage water, water and waste chains) make it possible and promote the distribution and use of renewable energy for heating and cooling and hot water generation" would be an effective strategy only if accompanied with adequate support.

Part 5: Adapting the market design and removing barriers

A separate public consultation, which was open during the period 15 July – 8 October 2015, gathered extensive input on a wide range of issues aimed inter alia at making the market design fit for renewables. This section includes complementary questions. Both public consultations will inform policy makers during the development of REDII.

Changes in the market provisions are of utmost importance in order to build a market which is fully fit for renewables. For example, the establishment of liquid and better integrated short-term intraday and balancing markets will help to increase flexibility and help renewable energy producers to integrate in

the market and compete on an equal footing with conventional energy producers, while the strengthening of the EU ETS can contribute to reinforce the long term investment environment.

The RED includes obligations to ensure transparent and foreseeable grid development for renewable energy as well as predictable, transparent and non-discriminatory grid connection and access procedures and costs. REDII as well as the Commission's market design initiative offers opportunities to update and improve these rules to take account of market developments and experience gained. Consideration also needs to be given to dispatch provisions in close connection with the development of the market design initiative.

The on-going evaluation of the Renewable Energy Directive (REFIT) shows that overall progress in removing non-financial barriers to renewable energy deployment in EU Member States is still limited and slow across the EU despite the specific provisions on administrative procedures, regulations and codes for renewable energy projects, requirements to share information and ensure quality of renewable energy training enshrined in the RED. Other studies point towards the same conclusion. It is reasonable to assume that there is therefore a need for more harmonized EU rules in a number of areas, including permitting procedures, spatial and environmental planning and vocational and professional training.

Note should be taken of already existing legal provisions and practice for streamlining and improving permit granting processes, in particular the provisions laid down in Regulation 347/2013 (TEN-E Regulation) and Directive 2011/92/EU (EIA Directive). Given the existing internal energy market, it is important to ensure that streamlining and improving the permitting granting processes is performed in accordance with existing internal EU legislation, as well as with due regard to the principle of subsidiarity and the national competences and procedures enabling renewable energy deployment. More effective and efficient administrative procedures should not compromise the high standards for protection of the environment and public participation. The establishment of a competent authority or authorities integrating or coordinating all permit granting processes ('one-stop-shop') should reduce complexity, increase efficiency and transparency and help enhance coordination among Member States.

18. In your view, which specific evolutions of the market rules would facilitate the integration of renewables into the market and allow for the creation of a level playing field across generation technologies? Please indicate the importance of the following elements to facilitate renewable integration:

	Very important	Important	Not very important	Not important	No opinion
A fully harmonised gate closure time for intraday throughout the EU	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Shorter trading intervals (e.g. 15 min)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Lower thresholds for bid sizes	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Risk hedging products to hedge renewable energy volatility	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Cross border capacity allocation for short-term markets (i.e., some					

capacity being reserved for intraday and balancing)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Introduction of longer-term transmission rights (> 3 years)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Regulatory measures to enable thermal, electrical and chemical storage	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Introduction of time-of-use retail prices	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Enshrine the right of consumers to participate in the market through demand response	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Any other view or ideas? Please specify.

3600 character(s) maximum

Prices should reflect actual scarcity and reward flexible production and consumption of renewables. Instead of building new gas infrastructure, grids should be upgraded throughout the EU to make them fit for an increasing uptake of renewables (smart grids).

Fair market access to all energy players should be ensured and enforced - e.g. discriminatory market access fees for decentralized RES generations in some markets should be removed in order to ensure a truly level playing field for all market players.

19. Currently, some exceptions from the standard balancing responsibilities of generators exist for energy from renewable sources. In view of increasingly mature renewable generation technologies and a growing role of short-term markets, is time ready to in principle make all generation technologies subject to full balancing responsibilities?

- Yes, in principle everyone should have full balancing responsibilities
 No, we still need exemptions

Please specify: If exemptions remain necessary, please specify if and in which case and why exemptions would still remain necessary (e.g. small renewable producers, non-mature technologies)?

3600 character(s) maximum

For small-scale citizen-led renewable energy projects and also municipal RES projects, there should be exemptions from full balancing responsibilities; their balancing responsibility should be borne by a third party which will most probably charge a lump sum to the responsible party - it should be ensured in the new market design that the imbalance costs are shared fairly within the portfolio.

20. Please assess the importance of stronger EU rules in the following areas to remove grid regulation and infrastructure barriers for renewable electricity deployment:

	Very important	Important	Not very important	Not important	No opinion
Treatment of curtailment, including compensation for curtailment	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Transparent and foreseeable grid development, taking into account renewable development and integrating both TSO and DSO level and smart technologies	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Predictable transparent and non-discriminatory connection procedure	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Obligation/priority of connection for renewables	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Cost of grid access, including cost structure	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Legal position of renewable energy developers to challenge grid access decisions by TSOs	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Transparency on local grid congestion and/or market-based incentives to invest in uncongested areas	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Comments and other ideas, including whether there are any consideration concerning gas from renewable energy sources, for instance expansion of gas infrastructure, publication of technical rules, please explain.

3600 character(s) maximum

To allow the creation of a level playing field across the various renewable energy technologies, technology-neutral tendering procedures should not be imposed upon MS, and it should be left up to the discretion of local authorities to evaluate what renewable energy source is more appropriate to their local context and specificities.

Above a certain threshold of market penetration (for large and integrated energy groups), full ownership unbundling between distribution, transmission and commercial activities should be sought, beyond cosmetic adjustments and name change towards complete legal and technical separation, to allow new entrants into the system.

Electricity tariffs should be set in a way in order to reduce fuel poverty and enable the creation of projects properly designed and appropriated to the local context. Grid development for uptake of RES should be increasingly

financed through structural funds and more importantly through the Connecting Europe Facility.

21. Which obstacles, if any, would you see for the dispatching of energy from all generation sources including renewables on the basis of merit order principles? Should there be any exemptions in some specific cases?

- Yes, exemptions are necessary
- No, merit order is sufficient

Please specify: If yes, in which case and why? What are the lessons from the implementation of RED?

3600 character(s) maximum

It is of paramount importance that priority access and dispatch, which is enshrined in the current RED, is kept in the revised RED. In addition to this, the Commission should provide guidance to MS on how to accommodate an increased share of RES cost-effectively in the grid while at the same-time shutting down inflexible and over-expensive nuclear and coal power plants and phase out fossil fuel subsidies.

22. Please assess the importance of stronger EU rules in the following areas to remove administrative barriers to renewable energy deployment:

	Very important	Important	Not very important	Not important	No opinion
Creation of a one stop shop at national level to allow for more streamlined permitting procedures	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Online application for permits	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
A defined maximum time-limit for permitting procedures, and effective consequences if deadline is missed	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Harmonisation of national permitting procedures	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Special rules for facilitating small-scale project permitting, including simple notification	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Pre-identified geographical areas for renewable energy projects or other measures to integrate renewable energy in spatial and environmental planning	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Any other views or ideas? To what extent has the RED been successful in reducing unnecessary administrative barriers for renewable energy projects in the Member States? Please specify.

3600 character(s) maximum

In terms of removing unnecessary administrative barriers for RES projects in MS, the current RED has not been that successful so far. These provisions must be therefore further strengthened in a revised RED, which means binding obligation for MS to set up one-stop shops for local RES projects, whose responsibility shall be delegated to suitable local or regional bodies such as local or regional energy agencies. By fully addressing administrative barriers (e.g. lengthy, complicated permit procedures), the cost for local RES can be substantially decreased without necessarily involving additional financial support.

23. Please identify precise challenges with regard to grid regulation and infrastructure barriers in EU Member States that you are aware of.

3600 character(s) maximum

A recent EUFORES analysis of the current RED has identified over 900 barriers that still stand in the way of full (local) RES deployment. Most out of these 900 barriers relate to grid regulation and infrastructure. In countries such as Poland or Czech Republic, there is no enforced priority access and connection to the grid for RES projects. In other countries such as Finland, Estonia or Spain, the grid connection process is not well regulated and intransparent. In other MS like Latvia or Poland, the grid is not developed adequately to accommodate increasing local RES. In MS like Greece or France, monopolist energy companies like EDF create hurdles and obstacles for cities to take back ownership of the local grid.

24. How would you rate the administrative burden and cost of compliance with the RED for national, regional and local authorities?

	Very important	Important	Not very important	Not important	No opinion
Administrative burden	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Cost of compliance	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please explain. How could the administrative burden and cost of compliance be reduced in the period after 2020?

3600 character(s) maximum

This could be reduced significantly by introducing a clear, strong chapter on community/municipal energy in the revised RED that clearly sets rules for community and municipal RES projects and legally defines the right to establish a citizen-led energy enterprise and a municipal energy company in every EU MS.

25. Please rate the importance of stronger EU rules in the following areas to remove barriers relating

to renewable energy training and certification:

	Very important	Important	Not very important	Not important	No opinion
Incentives for installers to participate in certification/qualification schemes	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Increased control and quality assurance from public authorities	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Understanding of the benefits and potential of renewable technologies by installers	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Mutual recognition of certificates between different Member States	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

Comments, other ideas, please explain. To what extent has the RED been successful in reducing unnecessary training and certification barriers in the Member States?

3600 character(s) maximum

26. How can public acceptance towards renewable energy projects and related grid development be improved?

3600 character(s) maximum

The social acceptance of the energy transition is an absolutely crucial question. In still too many MS like e.g. Netherlands, France or Belgium, especially wind projects have met with strong resistance (“Not in my backyard”), which was particularly due to the non-involvement of citizens in the RES project development process (lack of financial and decision-making ownership particularly).

In order to transform “Not in my backyard” into a European-wide “Yes in my backyard!”, the revised RED should introduce a binding requirement for local RES project developers to open the capital and governance of RES projects to citizen participation (e.g. such as the already mentioned 20% requirement in Denmark or similar promising possibilities in some parts of Belgium). Only by including European citizens as equal partners in the transition to a fully decarbonized energy system based on 100% RES by 2050, can social acceptance for a just transition be ensured.

Part 6: Increase the renewable energy use in the transport sector

Decarbonisation and the replacement of fossil fuels is particularly challenging in the transport sector. 94% percent of EU transport relies on oil products, of which 90% is imported and represents a growing share of carbon emissions. Against this background, the October 2014 European Council

invited the European Commission to further examine instruments and measures for the transport sector, including the promotion of energy from renewable energy sources.

According to European Commission estimates, a significant contribution from renewable transport fuels will be required to meet the overall EU 2030 decarbonisation targets . To achieve this, measures will need to be put in place to require an increased market up-take and deployment of sustainable low-carbon biofuels and alternative renewable fuels as well as renewable electricity in battery electric vehicles and hydrogen in fuel cell vehicles.

For example, further use could be made of incorporation obligations, dedicated financing (in particular in the heavy duty transport and aviation industry) and measures to increase access to smart energy services and infrastructure and promote the development of advanced renewable fuels which are not based on food crops. Special care needs to be taken to remove current market distortions and fragmentations of the EU internal market.

28. To what extent has the RED been successful in addressing the following EU transport policy objectives?

	Very successful	Successful	Not very successful	Not successful	No opinion
Contribute towards the EU's decarbonisation objectives	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Reduce dependency on oil imports	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Increase diversification of transport fuels	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Increase energy recovery from wastes	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Reduce air pollution, particularly in urban areas	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Strengthen the EU industry and economy competitiveness	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Stimulate development and growth of innovative technologies	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Reduce production costs of renewable fuels by lowering the level of investment risk	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Facilitate fuel cost reduction by integration of the EU market for renewable fuels	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

Any other view or ideas? Please specify

3600 character(s) maximum

A revised RED should put a stronger focus on sustainable urban mobility. Renewable fuels like biogas from waste - which also contribute to circular economy objectives - should be promoted to a greater extent through guidance to MS on how to replicate existing best practices on their territories. Sustainable urban mobility plans should be considered a priority in EU finance, such as for instance through the Smart Cities and Communities program for cities post-2020.

Beyond the promotion of electro mobility and alternative fuels, the EU should look into the disproportionate space and importance given to motorized vehicles in the urban environment, and actively promote modal shift, through alternative, soft transport modes, to ensure a faire share of the public space and improve urban quality of life with reduced noise and congestion and freed-up areas for community living, such as parks, large sidewalks, etc.

29. Please name the most important barriers hampering the development of sustainable renewable fuels and renewable electricity use in transport?

Please explain, and quantify your replies to the extent possible.

3600 character(s) maximum

There is a clear lack of finance for electro-mobility in the EU, but also a strong lack of innovation. There is only one company at the moment - Solaris in Poland - which is producing E-buses in the EU. Otherwise the market is dominated by China. Through the revised RED that makes links to the SET-Plan in the Energy Union, innovation finance for electro-mobility should be upscaled in Europe, as well as research into making other sustainable fuels (such as biogas) more competitive. But more importantly, an ELENA 2.0 facility from the EIB specifically targeted for clean urban transport should be introduced in the coming years in order to widely introduce sustainable urban transport in local authorities' territories.

30. Please rate the most effective means of promoting the consumption of sustainable renewable fuels in the EU transport sector and increasing the uptake of electric vehicles:

	Very effective	Effective	Not very effective	Not effective	No opinion
Increased use of certain market players' obligations at Member State level	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
More harmonised promotion measures at Member States level	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
The introduction of certain market players' obligations at the EU level	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

Targeted financial support for deployment of innovative low-carbon technologies (in particular to the heavy duty transport and aviation industry)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Increased access to energy system services (such as balancing and voltage and frequency support when using electric vehicles)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Increased access to alternative fuel infrastructure (such as electric vehicle charging points)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Any other view or ideas? Please specify.

3600 character(s) maximum

Successful, innovative financing schemes, such as the joint public procurement project which helped finance public transport infrastructure in Dijon and Brest, should be further promoted as it allows for economies of scale and thus leads to considerable public savings which can be reinvested in other aspects of the mobility plan.

Contact

✉ Sara.DEMEERSMAN-JAGANJACOVA@ec.europa.eu