



## EASE Answers to European Commission Consultation on the Renewable Energy Directive (RED) after 2020

10 February 2016

Please refer to the accompanying document “*REDII 2020 Consultation Questionnaire*”

1. To what extent has the RED been successful in helping to achieve the EU energy and climate change objectives? (Please underline one answer)

- 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 of achieving these 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 RED.

Please explain.

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 (please insert ‘X’)

|  | Very important | Important | Not very important | Not important | No opinion |
|--|----------------|-----------|--------------------|---------------|------------|
| Forward looking strategic planning of RES development is required by EU legislation                    |                | X         |                    |               |            |
| Best practice is derived from the implementation of the existing Renewable Energy Directive            |                | X         |                    |               |            |
| Regional consultations on renewable energy policy and measures are required                            |                |           | X                  |               |            |
| Members States consult on and adopt renewable energy strategies that serve as the agreed reference for | X              |           |                    |               |            |

|  |  |   |  |  |  |
|--|--|---|--|--|--|
| national and renewable energy policies and projects                      |  |   |  |  |  |
| The Commission provides guidance on national renewable energy strategies |  | X |  |  |  |

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

Please explain.

*Each Member State has its own particular competences and challenges when it comes to tackling climate change. It is important that each Member State is allowed to play to its strengths, but also that the EU ensures the overall EU targets are being met. This might mean that some Member States are more active on RES than others, but each must make a telling contribution relative to its capabilities and constraints.*

*Additionally, long-term contracts that are properly tendered and administered can be an effective way to reduce overall costs by allowing further financial players into the market and hence creating predictability for investors and producers.*

*The EU and its Member States need to make sure rules are clear and stable, enabling a proper allocation of risks to long-term contract participants. The challenge is to provide confidence for the investor that an acceptable return on the up-front capital investment over the lifetime of the asset will be achieved.*

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   | X              |           |                    |               |            |
| In relation to national/regional natural resources, specific technology relevant trajectories for renewable energy up to 2030  | X              |           |                    |               |            |
| Overview of policies and measures in place and planned new ones  |                | X         |                    |               |            |
| Overview of renewable energy trajectories and policies to 2050 to ensure that 2030 policies lie on the path to 2050 objectives |                |           | X                  |               |            |
| Qualitative analysis   |                |           | X                  |               |            |
| Trajectories for electricity demand including both installed capacity (GW) and produced energy (TWh)                           | X              |           |                    |               |            |

|  |   |  |  |  |  |
|--|---|--|--|--|--|
| Measures to be taken for increasing the flexibility of the energy system with regard to renewable energy production  | X |  |  |  |  |
| 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 | X |  |  |  |  |

Please explain (Max 500 words).

*Regional measures for balancing and reserves are especially important for systems with a large share of (intermittent) renewables. These measures as well as other calculations on system adequacy need to take account energy storage technologies and the services these can provide to the grid.*

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.

*Alternatives to the current subsidies for RES should be found and these should be harmonised at EU level.*

*A gradual alignment of National support schemes would leave the right flexibility to Member States to develop their strategy for the development of RES. Should, for some countries, the regional approach preferable, such countries could take advantage of bilateral agreement or cross-border participation clauses, as foreseen in question 6. At the same time, in order to guarantee a clear and transparent investment framework, as well as to ease the cross-border participation, common rules at EU level should be defined.*

*Renewable subsidies for mature technologies should be eliminated and non-discriminatory access to technologies which can facilitate the economic growth of renewables (like energy storage) should be facilitated with market based regulation.*

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?

Please explain.

*RES schemes have a relatively high up-front capital cost, but, due to the fact that the marginal cost of producing energy is essentially zero, over their lifetime they provide a superior economic performance – not to mention their environmental performance. Mechanisms to allow and facilitate long-term financing of such projects are essential, This could be achieved through long-term contracts. If these are properly tendered and administered they can be an effective way to reduce overall costs by allowing further financial players into the market and creating predictability for producers. Under the conditions of intermittent RES, long-term contracts between generators and consumers will become more important in order to maintain a reliable energy supply. The critical barrier is that market participants do not yet have a clear picture of the regulatory framework. The EU and its Member States can make sure rules are clear and stable, enabling a proper allocation of risks to long-term contract participants. If long-term contracts are not possible, long-term price signals should be ensured. Additionally, non-discriminatory access to technologies which can facilitate the economic growth of renewables (like energy storage) should be facilitated with market-based regulation.*

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.  
Please explain.

7. The use of cooperation mechanisms has been limited to date. Which if 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   |                | X         |                    |               |            |
| Administrative complexities  |                | X         |                    |               |            |
| Lack of cost-effectiveness/uncertain benefit for individual Member States                                  |                | X         |                    |               |            |
| Government driven process, not market driven   | X              |           |                    |               |            |
| Member States reluctant to see their taxpayers/consumers' money used for investments outside their country | X              |           |                    |               |            |

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.

*All support schemes should include balancing obligations.*

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                            |                | X         |                    |               |            |
| EU-level requirements on market players to include a certain share of renewables in production, supply or consumption | X              |           |                    |               |            |
| EU-level financial support (e.g. a guarantee fund in support of renewable projects)                                   | X              |           |                    |               |            |
| EU-level support to research, innovation and industrialisation of novel renewable energy technologies                 |                | X         |                    |               |            |
| Enhance EU level regulatory measures  | X              |           |                    |               |            |

Any other ideas or comments? Please explain. Max 500 words.

*EU-level support to R&I of novel renewable energy technologies needs to be assured. We welcome the SET-Plan, NER 400 and Horizon 2020 activities.*

*Additionally, research efforts should focus on the proper integration of renewables into the grid, by also relying on technologies such as energy storage and smart grids.*

*Consumer engagement will become more and more important in tackling the heating and cooling challenge. Measures aimed at consumers (both domestic and commercial) will be relevant.*

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?

Please explain.

*The EU is on a good path to become the number one in renewables in terms of quantity. However, it also should be aimed at becoming the number one in the integration of renewables into the grid. More research funds should be allocated to the effective integration of renewables into the grid.*

*Technologies enabling the integration of renewables into the grid, such as energy storage and smart grids, should be given a level-playing field in order to become competitive and able to unfold its full potential.*

*Moreover, a clear, predictable and transparent investment framework with long term market signals is an essential prerequisite to further exploit the RES potential and industry in the 2030 horizon.*

## Empowering Consumers

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

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

Other? Please explain.

*Electricity tariffs are a key driver for consumer engagement. They can be used to alter behaviour through automated response of thermal and electrical consumption and energy storage.*

*A mechanism needs to be found to properly reward consumer behaviour and therefore to encourage deployment of small-scale RES and energy storage technologies. The contribution of Energy Storage to the markets will become apparent when an equal treatment as compared to demand and generation is achieved.*

*In order to integrate prosumers on the market, indirect subsidies, such as non-market based net metering schemes and exemptions to the payment of network and system charges should be avoided in order not to distort the market and not to create a burden for the generality of consumers. On tariff issues, it is of utmost importance that self-generation is treated on an equal footing with other generation technologies in order to avoid the risk of consumer divide (i.e. the risk that customers who, for whatever reason, cannot generate their own electricity end up paying more than their share of the cost). In particular, it has to be recognized that the growth in self-generation does not decrease distribution costs, which are driven by the peak capacity. Therefore, in order to ensure an efficient and equitable allocation of network and system costs, exemptions for self-generators from the payment of network and system charges on self-consumed energy should be removed. Otherwise, if such exemptions still apply, the more self-consumption increases and the more the system will collapse due to the increasing burden to the generality of customers or due to a shortfall in DSO revenues.*

*One of the main barriers for consumers to produce and self-consume their own renewable energy is the slow rate of grid modernisation across the EU. This factor is key to enabling participation of consumers and prosumers and an efficient integration of all energy sources onto the system. The availability of adequate metering data is necessary in order to integrate prosumers' on the system and on the market, thus smart metering should be implemented in all Member States.*

*A level-playing field needs to be created so that such aggregation can be adequately rewarded to incentivise the consumer to want to be involved and to deliver an adequate return to the aggregator for the investment required in addition to the consumers' normal equipment (specifically Heat Ventilation and Air Conditioning and energy storage appliances). Grid tariffs have to be cost reflective if we want to create a level playing field. It is also necessary to recognise the role of system flexibility and therefore a clear definition, one that includes spatial and temporal constraints, is needed.*

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?

*There are massive regional and technology disparities - PV in particular has been heavily deployed in certain areas, driven by subsidies which have been poorly calculated and deployed. Other technologies such as heat pumps, smart grids and energy storage have huge potential but are heavily under-exploited. The key questions to ask are "why" the technologies have not reached their potential and "how" this can be addressed. Firstly they suffer from two key issues: high up front cost and poor consumer understanding of the technologies/fear of the unknown. In certain cases the supply chain (installers) have not reached sufficient levels of competence either. These two issues need to be addressed by offering capital support programme which tackles the high up front cost and takes a lifetime cost view where RES technologies appear much more favourable. Regarding fear of the unknown and poor reference experiences, this requires marketing of the message and training of the consultants, specifiers and contractors in the area.*

*Another issue is the lack of focus on the full integration of renewables into the grid, achievable through the deployment of smart grids and in general the modernisation and digitalization of the grid.*

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

|   | Very important | Important | Not very important | Not important | No opinion |
|---|----------------|-----------|--------------------|---------------|------------|
| Lack of support from Member State authorities   |                | X         |                    |               |            |
| Lack of administrative capacity and/or expertise/knowledge/information at the local level |                | X         |                    |               |            |
| Lack of energy strategy and planning at local level                                       |                | X         |                    |               |            |
| Lack of eligible land for projects and private property conflicts                         |                |           | X                  |               |            |
| Difficulties in clustering projects to reach a critical mass at local level               |                |           | X                  |               |            |
| Lack of targeted financial resources (including support schemes)                          | X              |           |                    |               |            |
| Negative public perception  | X              |           |                    |               |            |

Other? Please explain.

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

|   | Very important | Appropriate | Not very appropriate | Not appropriate | No opinion |
|---|----------------|-------------|----------------------|-----------------|------------|
| Promoting the integration of renewable energy in local infrastructure and public services               | X              |             |                      |                 |            |
| Supporting local authorities in preparing strategies and plans for the promotion of renewable energy    |                | X           |                      |                 |            |
| Facilitating cooperation between relevant actors at the local or municipal level                        |                | X           |                      |                 |            |
| Facilitating access to targeted financing   | X              |             |                      |                 |            |
| EU-wide right to generate, self-consume and store renewable electricity                                 | X              |             |                      |                 |            |
| Measures to ensure that surplus self-generated electricity is fairly valued                             | X              |             |                      |                 |            |
| Harmonised principles for network tariffs that promote consumers' flexibility and minimise system costs | X              |             |                      |                 |            |

Other? Please explain. Max 500 words.

*If self-generated electricity that has been stored ends up constituting a service to the grid, this service should be fairly compensated by the market.*

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?

Please explain. Max 500 words.

## Decarbonising the heating and cooling sector

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

|  | Very important | Important | Not very important | Not important | No opinion |
|--|----------------|-----------|--------------------|---------------|------------|
| Real or perceived incoherence in existing EU policies (such as RED, EED and EPBD)  |                | X         |                    |               |            |
| Lack of administrative capacity and/or expertise/knowledge/information at the national and local level   |                | X         |                    |               |            |
| Lack of energy strategy and planning at the national and local level   |                | X         |                    |               |            |
| Lack of physical space to develop renewable heating and cooling solutions  |                |           | X                  |               |            |
| 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              | X              |           |                    |               |            |
| 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 | X              |           |                    |               |            |
| Lack of targeted financial resources and financing instruments   | X              |           |                    |               |            |
| Lack of definition and recognition of renewable cooling  |                | X         |                    |               |            |
| Lack of electricity market design supporting demand response, decentralised energy and self-consumption and thermal storage in buildings and district systems                            | X              |           |                    |               |            |
| Lack of mapping tools to identify the resources potential at regional scale with local renewable energy  |                |           | X                  |               |            |

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|--|---|---|--|--|--|
| Lack of tools and information to compare the lifecycle costs of the various alternative heating and cooling alternatives |   | X |  |  |  |
| Negative public perception   | X |   |  |  |  |

Other? Please specify and explain. Max 500 words.

*The renewable heating and cooling sector has been grossly undervalued. The storage of heat and cold by help of different storage technologies is a key for the success of decarbonisation efforts, by allowing RES electricity to be consumed at times of low electricity demand and used later for heating / cooling purposes, thus allowing a higher penetration of renewable energy onto the grid.*

*The barriers are*

- *Lack of coherence between the different EU Directives and Regulations related to the energy system and its consumption.*
- *In efficiency calculations like in the delegated acts of the Ecodesign Directive and of the Energy Labelling Directive, calculations are still based on a primary energy factor of 2.5, which makes electric heating and cooling appear inefficient in comparison to other technologies. Because in reality, due to the increase in using electric energy from renewable sources, the primary energy factor continues to decrease. This means that heating and cooling on the basis of electric energy becomes increasingly more renewable. We therefore recommend adapting the primary energy factor regularly to the development of renewable energies.*
- *It is essential to design regulations in such a way that they allow heat storage to play a role, e.g. technologies like smart electric thermal storage<sup>1</sup> (space and water heating).*
- *high up-front cost and poor consumer understanding of the technologies/fear of the unknown also plays a role. capital support programmes could be an option, which tackle the high up-front cost and take a lifetime-cost view in which RES technologies appear much more favourable.*

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  | X              |           |                    |               |            |
| 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 | X              |           |                    |               |            |
| Requirement that all urban and municipal infrastructure upgrades (energy infrastructures, and other   | X              |           |                    |               |            |

<sup>1</sup> SETS is a local small scale storage technology applying ICT technology in which electrical energy is stored as heat in order to meet householders' domestic space and water heating needs

|   |   |   |  |  |  |
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| 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 |   |   |  |  |  |
| Measures supporting best practices in urban planning, heat planning, energy master planning, and project development  |   | X |  |  |  |
| Criteria and benchmarks for promoting district heating and cooling taking into consideration the local and regional conditions  |   | X |  |  |  |
| Nearly zero-energy building (NZEB) standards to include a mandatory minimum use of renewable energy   | X |   |  |  |  |
| Including systematically renewable energy production in buildings' energy performance certificates  | X |   |  |  |  |
| The promotion of green public procurement requirements for renewable heating & cooling in public buildings  | X |   |  |  |  |
| Heating and cooling equipment installers should present renewable energy alternatives when asked to replace fossil fuel heating and cooling equipment   |   | X |  |  |  |
| Develop best practices for enterprises, including SMEs, to integrate renewable heating and cooling into their supply chains and operations  |   | X |  |  |  |
| Requirement to consider renewable energy alternatives in subnational, national, regional or EU security of supply risk preparedness plans and emergency procedures                                |   | X |  |  |  |
| Targeted financial measures   | X |   |  |  |  |

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

Max 500 words.

## Adapting the market design and removing barriers

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   |                | X         |                    |               |            |
| Shorter trading intervals (e.g. 15 min)   | X              |           |                    |               |            |
| Lower thresholds for bid sizes  | X              |           |                    |               |            |
| Risk hedging products to hedge renewable energy volatility  |                | X         |                    |               |            |
| Cross border capacity allocation for short-term markets (i.e., some capacity being reserved for intraday and balancing) |                |           | X                  |               |            |
| Introduction of longer-term transmission rights (> 3 years)   |                |           | X                  |               |            |
| Regulatory measures to enable thermal, electrical and chemical storage  | X              |           |                    |               |            |
| Introduction of time-of-use retail prices   | X              |           |                    |               |            |
| Enshrine the right of consumers to participate in the market through demand response                                    | X              |           |                    |               |            |

Any other view or ideas? Please specify.

*Shorter trading intervals would allow many market entrants like energy storage to play a role in grid balancing.*

*Effectively integrating RES into the market requires the definition of a level playing field where RES can compete on an equal footing with conventional sources. RES should be exposed to prices from well-functioning markets, suitable for RES, which would give adequate signals to produce electricity when needed or to install/use storage technologies. In other words, apart from providing long-term signals, they must also efficiently use the available flexibility and assign the right value to it. The following main conditions must be met for markets to be "fit for RES":*

- Adequate intraday markets, based on the model defined in the Capacity Allocation and Congestion Management Guidelines, i.e. continuous trading and harmonized gate closure time near real time*
- Imbalance settlement periods are set out accordingly (more granular intraday markets with gate closure close to real time allow shorter imbalance settlement periods) and imbalances should be settled according to a single price mechanism*

- *Clear rules for efficient curtailing of power generation and cross-border interconnection capacity*
- *Balancing markets allow the efficient use of balancing resources and enables RES participation, i.e. balancing products is designed to ensure a level playing field between RES and conventional power plants, e.g. with adequate activation and delivery periods.*

*Until the market design is improved to meet these principles (i.e. the market is “fit for RES”, enabling fair competition among all sources), some measures could be envisaged for intermittent RES in order to guarantee a smooth transition (e.g. partial exemptions from balancing responsibilities, priority connection and dispatch).*

*Investors should be able to rely on underlying general principles of continuity and stability of the regulatory framework, including the avoidance of any retroactive measures. In any case, existing non-programmable RES plants should maintain all the direct benefits that they were granted at the time of the investment decision, i.e. including in the case of the application of negative prices.*

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

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)?

*Every generator should be subject to all market rules, meaning that balancing obligations should also apply. It should also be recalled that being subject to “standard balancing responsibilities” is one of the pre-conditions to grant operating aid to RES industry pursuant to the EC “Guidelines on State aid for environmental protection and energy 2014–2020”. For RES, dispatchability can be achieved by including Energy Storage devices or by pooling the different generation technologies.*

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  | X              |           |                    |               |            |
| Transparent and foreseeable grid development, taking into account renewable development and integrating both TSO and DSO level and smart technologies | X              |           |                    |               |            |
| Predictable transparent and non-discriminatory connection procedure   |                | X         |                    |               |            |

|   |  |   |  |   |  |
|---|--|---|--|---|--|
| Obligation/priority of connection for renewables  |  | X |  |   |  |
| Cost of grid access, including cost structure   |  |   |  | X |  |
| Legal position of renewable energy developers to challenge grid access decisions by TSOs            |  | X |  |   |  |
| Transparency on local grid congestion and/or market-based incentives to invest in uncongested areas |  | X |  |   |  |

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.

Max 500 words.

*Transparent and foreseeable grid development is extremely important, taking into account renewable development, system needs at both TSO and DSO level and smart technologies such as Energy Storage.*

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?

*Obstacles include the renewables subsidies themselves. Every generator should be subject to all market rules, meaning that balancing obligations should also apply. In the past, it was not compatible to have RES and dispatchable power generation. This has shifted now since the dispatchability can be achieved by including Energy Storage devices or by pooling the different generation technologies. But given the current design of RES subsidies there is no such need as to be dispatchable.*

*It should also be recalled that being subject to "standard balancing responsibilities" is one of the pre-conditions to grant operating aid to RES industry pursuant to the EC "Guidelines on State aid for environmental protection and energy 2014-2020".*

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        | X              |           |                    |               |            |
| Online application for permits   | X              |           |                    |               |            |
| A defined maximum time-limit for permitting procedures, and effective consequences if deadline is missed |                | X         |                    |               |            |
| Harmonisation of national permitting procedures  | X              |           |                    |               |            |

|   |  |   |  |  |  |
|---|--|---|--|--|--|
| Special rules for facilitating small-scale project permitting, including simple notification  |  | X |  |  |  |
| Pre-identified geographical areas for renewable energy projects or other measures to integrate renewable energy in spatial and environmental planning |  | X |  |  |  |

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.

Max 500 words.

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

Max 500 words.

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 |
|---|----------------|-----------|--------------------|---------------|------------|
| Incentives for installers to participate in certification/qualification schemes     |                |           |                    |               |            |
| Increased control and quality assurance from public authorities                     |                |           |                    |               |            |
| Understanding of the benefits and potential of renewable technologies by installers |                |           |                    |               |            |
| Mutual recognition of certificates between different Member States                  |                |           |                    |               |            |

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

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     |                | X         |                    |               |            |
| Increased control and quality assurance from public authorities                     |                | X         |                    |               |            |
| Understanding of the benefits and potential of renewable technologies by installers | X              |           |                    |               |            |
| Mutual recognition of certificates between different Member States                  |                |           | X                  |               |            |

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

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

## Increase the renewable energy use in the transport sector

27. 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                              |                 |            |                     |                |            |
| Reduce dependency on oil imports  |                 |            |                     |                |            |
| Increase diversification of transport fuels   |                 |            |                     |                |            |
| Increase energy recovery from wastes  |                 |            |                     |                |            |
| Reduce air pollution, particularly in urban areas                                   |                 |            |                     |                |            |
| Strengthen the EU industry and economy competitiveness                              |                 |            |                     |                |            |
| Stimulate development and growth of innovative technologies                         |                 |            |                     |                |            |
| Reduce production costs of renewable fuels by lowering the level of investment risk |                 |            |                     |                |            |
| Facilitate fuel cost reduction by integration of the EU market for renewable fuels  |                 |            |                     |                |            |

Any other view or ideas? Please specify.

28. 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.

*"Green Hydrogen", which is then added to conventional Diesel, could help decarbonise the transport sector. Green Hydrogen is produced by electrolyzers with power from windmills and therefore has an extremely small CO2 footprint. The use of this Green Hydrogen in fuel preparation should be supported and incentivised.*

29. 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  |                |           |                    |               |            |
| More harmonised promotion measures at Member States level   |                |           |                    |               |            |
| The introduction of certain market players' obligations at the EU level   |                | X         |                    |               |            |
| Targeted financial support for deployment of innovative low-carbon technologies (in particular to the heavy duty transport and aviation industry) |                | X         |                    |               |            |
| Increased access to energy system services (such as balancing and voltage and frequency support when using electric vehicles)                     |                | X         |                    |               |            |
| Increased access to alternative fuel infrastructure (such as electric vehicle charging points)  |                | X         |                    |               |            |

Any other view or ideas? Please specify.



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*The European Association for Storage of Energy (EASE) is the voice of the energy storage community, actively promoting the use of energy storage in Europe and worldwide.*

*EASE actively supports the deployment of energy storage as an indispensable instrument to improve the flexibility of and deliver services to the energy system with respect to European energy and climate policy. EASE seeks to build a European platform for sharing and disseminating energy storage-related information. EASE ultimately aims to support the transition towards a sustainable, flexible and stable energy system in Europe.*

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Contact person:

Policy Contact: Victoria Gerus | EASE Policy Officer | [v.gerus@ease-storage.eu](mailto:v.gerus@ease-storage.eu) | +32 (0)2 743 29 82

Disclaimer:

*This response was elaborated by EASE and reflects a consolidated view of its members from an Energy Storage point of view. Individual EASE members may adopt different positions on certain topics from their corporate standpoint.*