EASE Response on Stakeholder Consultation on Commission Guidance on Grid Connections

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EASE – European Association for Storage of Energy

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INTRODUCTION

The European Commission is seeking input by stakeholders on its planned guidance on how to handle grid connections, in particular in situations with capacity constraints, and would like to give stakeholders the opportunity to present their views.

This is key for energy storage as the long-term solution to the challenge of the constraints on grid availability is the accelerated build out of the grids. Efficiency of the existing grids also needs to be improved. In the short-term, a transparent and adequate treatment of connection requests by grid operators, including the use of flexible connection agreements, is key for the energy transition.

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Consultation questions:

1. Treatment of speculative applications

The hoarding of grid connection capacity can be a significant issue when developers secure grid connection approvals but delay or never proceed with the project construction, thereby blocking access for other users who may be ready to build the projects in a foreseeable future.

1.1 Do you consider that there is a problem in the EU or certain Member States with speculative and immature requests?

X Yes

☐ To a certain extent

☐ No

☐ No reply

1.2 Please specify the problems, the Member State(s) concerned and how it affects the connections.

Answer: Speculative and immature projects hamper the visibility of the available capacity on the different locations of the grids, both on transmission and distribution levels. It can be observed when comparing the capacity reserved in the grid connection queue and the projects effectively connected to the grid: the difference comes from "ghost/zombie projects": those stuck in the queue, as well as projects developed but not to the level of capacity agreed in the system operator's grid connection approval. As a consequence, serious projects are stuck in the grid connection queue behind the remaining ghost projects, or discouraged to join the queue as the capacity declared available is not reliable. This situation is detrimental as it slows down the electrification process.

1.3 In your view, what would be the best approach to avoid that speculative and immature application create a bottleneck for processing connection requests?

Answer:

- Introduce mandatory project maturity criteria (e.g. land rights, permits, financial guarantees) and milestone-based progress tracking. These criteria should be discussed and negotiated between system operators and stakeholders and then, approved by the relevant authorities (Member State and/or regulator).

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- Implement a “use-it-or-lose-it” principle after a reasonable grace period, while also avoiding to excessively penalising certain projects impacted by external factors such as Force Majeure and supply chain disruptions.

Given the nature of storage assets, flexible grid connections — both from the generation and the demand side — can be a key enabler to address the widespread issue of lacking connection capacity due to projects blocking access to substations. However, to avoid overwhelming the system with an unmanageable volume of requests, it is essential to ensure that projects seeking to connect are robust and credible — not ghost or speculative initiatives. Finding the right balance would enable more efficient integration of renewables and energy storage assets.

1.4 Can you provide a best practice from an EU Member State?

Answer: The “first-ready, first-served” principle, recently greenlit by Ofgem in the UK, which applies milestone-based requirements for projects to maintain their position or advance in the queue. This principle is also considered by the French transportation system operator RTE.

2. Treatment of delayed and stalled projects

In certain situations, projects that already have the right to connect may not proceed as initially envisaged. Such projects which are not maturing may thus lock capacity.

2.1 Do you consider that there is a problem in the EU or certain Member States with non-maturing projects for which capacity is locked?

X Yes

☐ To a certain extent

☐ No

☐ No reply

2.2 In your view, what would be the best approach to avoid that projects which are not maturing lock capacity?

Answer: Stalled projects—often without progress for years—continue to block capacity. This is widespread, including in Germany and Portugal. For energy storage, which often seeks faster deployment, this limits access unfairly.

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To enable faster and more efficient grid connection of projects that support EU decarbonisation and system optimisation, the EU should move away from the outdated "first-come, first-served" approach. Instead, a "first-ready, first-served" model should be adopted—prioritising projects based on clearly defined development milestones (e.g. permitting, land rights, financial closing), while allowing flexibility for projects impacted by Force Majeure. These criteria for milestone tracking and for identifying dormant projects should be discussed and negotiated between system operators and stakeholders and then, approved by the relevant authorities (Member State and/or regulator). These criteria should also avoid to excessively penalising certain projects impacted by external factors such as Force Majeure and supply chain disruptions.

This approach would unlock stalled or speculative "ghost" projects that currently block grid capacity, encourage more mature applications, and improve overall queue management. Viable projects would benefit from faster processing, while underperforming or inactive projects could be deprioritised or removed.

Additional measures should include:

- Granting public interest status to grid development projects, beyond renewable generation alone.
- Allowing positive silence[1] to accelerate administrative decisions where appropriate.
- Mandating regularly updated, transparent capacity maps showing available grid capacity and planned reinforcements.
- Requiring TSOs to publish key performance data on grid connection queues, capacity, and investment progress.
- Adapting queue processes by asset type, considering their different system impacts and urgency.

The UK provides a practice example: queue reforms now prioritise projects with land and planning rights and protect those with strategic significance, such as those relieving congestion or deferring grid investments. These projects retain queue positions if they meet agreed development milestones. Projects with government contracts are protected to ensure

[1] Positive silence, in the context of grid connections, refers to an administrative process where a grid connection request is automatically approved if the relevant authority does not respond within a specified timeframe.

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investor certainty. The reforms were implemented with transparent timelines from the outset, striking a balance between reform and predictability.

Member States that integrate these proposals into their connection queue reforms unlock cost-effective, grid-friendly flexibility solutions like energy storage and demand-side assets—ultimately accelerating the energy transition and optimising infrastructure use.

2.3 Can you provide a best practice from an EU Member State?

Answer: The French energy regulator CRE has approved a rule allowing both transmission and distribution system operators to reduce the grid capacity granted to existing projects if it hasn't been used after five years. However, projects can still request this capacity again in the future if needed.

For new projects, developers can opt for a gradual ramp-up of their grid capacity over a period of up to 10 years. The ramp-up schedule, including specific milestones, will be defined in the connection agreement, giving system operators better visibility and planning certainty.

3. Modification of existing grid connections

In some Member States, the modification of an existing grid connection requires the grid users to submit a new connection request, even in situations where the is no or only a limited increase in the contracted grid capacity.

3.1 Do you encounter situations in which you are required to submit a new connection request for a limited modification of an existing connection?

X Yes

☐ To a certain extent

☐ No

☐ No reply

3.2 Does this cause delays (several months or years) in proceeding with the modification?

X Yes

☐ To a certain extent

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☐ No

☐ No reply

3.3 Do you consider that the modification of an existing grid connection should be possible without having to fully re-apply?

☐ Yes

X To a certain extent

☐ No

☐ No reply

3.4 Please elaborate the procedure you would envisage and for which kind of modifications, whether a differentiation between increase and decrease in connection capacity should be made, or which other aspects should be considered.

Answer: Energy storage operators should be able to modify existing connections (e.g. for adding flexibility or hybridising assets) without full re-application if no increase in capacity is involved. Administrative burden should not hinder storage in its flexibility and value stacking potential if no further impact on grid operations is expected. Differentiation should also be made between minor (e.g. metering update) and major (capacity-increasing) modifications: limited capacity increases should not require the same amount of administrative burden as substantial capacity increases.

In Spain, another barrier exists: renewable energy projects that wish to hybridise with storage must do so under the same Special Purpose Vehicle (SPV), which imposes legal and operational constraints. Allowing hybridisation under separate legal entities — while maintaining appropriate coordination and safeguards — would facilitate more flexible, competitive, and efficient development of collocated BESS projects.

3.5 Can you provide a best practice from an EU Member State?

Answer:

4. Non-discriminatory access to the grid in situations with insufficient grid capacity

4.1. Measures in case of lacking capacity

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Lack of capacity is a new but spreading reality for European DSOs. There are several measures which Member States are starting to use to improve the handling of grid connection requests in such situations. These can be auctions and application windows but also the use of flexible connection agreements in line with Article 6a of the Electricity Directive, cable pooling (hybridisation) and others.

4.1.1 Please describe the measures you would suggest as suitable for handling grid connection requests in situations with lacking capacity. Please specify why you chose this option / these options and explain the benefits (and potential disadvantages) of the respective options.

Answer: Flexible Connection Agreements (FCAs) are an effective mechanism for connecting assets, such as Energy Storage Systems (ESS), to grids with limited capacity. They help reduce electricity prices, mitigate price volatility, and enhance the competitiveness of power markets.

However, FCAs could potentially replace established remunerated redispatch processes, where grid operators compensate assets for curtailing output to manage congestion. This shift may reduce revenues for connected assets, impacting their financial viability.

Per Article 6a of the Electricity Directive, FCAs must transition to firm connection agreements once grid capacity is expanded. To ensure this, regulators should establish incentives or obligations for grid operators to expand capacity in congested areas, coordinated between Distribution System Operators (DSOs) and Transmission System Operators (TSOs), as outlined in the forthcoming Network Code on Demand Response (DNDP). FCAs should be designed with reasonable, necessary, and transparent criteria to prevent overly restrictive or prolonged implementation.

In Spain, for instance, BESS projects are currently barred from connecting to substations already congested by renewable energy sources, leading to suboptimal project development. Promoting flexible access schemes in such cases would optimise infrastructure use while ensuring grid stability.

These unlock faster access and better utilise grid capacity and, in this regard, regulatory oversight of Flexible Connection Agreements (FCAs) is key to not have overly strict and stringent FCAs.

4.1.2 Please provide concrete example, if available, for the respective potential solutions.

Answer:

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4.2 Requests from grid users below a certain size

4.2.1 In your view, should connection requests from projects below a certain size be treated differently?

☐ Yes

☐ To a certain extent

X No

☐ No reply

4.2.2 Can you provide a best practice from an EU Member State?

Answer: There is no reason to treat grid connection differently depending on size. On the contrary, 100 projects of 0.1 MW could be just as impactful (if not more) than 10 projects of 1 MW or 1 project of 10 MW.

4.3 Deviation from the first-come, first-served approach in favour of a system with objective criteria

Although many Member States apply a first-come, first-served approach to connection requests, this is not required specifically by EU legislation (see Article 6 of the Electricity Directive 2019/944 on third-party access). Indeed, certain projects when connected to the grid can deliver benefits to the grid and the electricity system and alleviate congestion. Some projects contribute to the energy and climate transition. Other projects relate to services are of general interest to the society. Such as public transport, postal services, and healthcare. These services can be economic (e.g. postal services), non-economic (e.g. police and justice) and social.

4.3.1 Would you see any merit in setting up transparent criteria for treating connection requests based on their contribution to alleviating congestion in the electricity grid?

X Yes

☐ To a certain extent

☐ No

☐ No reply

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4.3.2 Would you see any merit in setting up transparent criteria for treating connection requests based on their potential contribution to the clean energy transition, or their contribution to services of general interest or any other?

X Yes

☐ To a certain extent

☐ No

☐ No reply

4.3.3 What would be the criterion to determine which users should benefit from the deviation from the first-come-first-served queuing system (keeping in mind 6 of the Electricity Directive 2019/944 that provides for third party access to the grid on a transparent, objective and non-discriminatory basis).

Answer: It's important to move away from the "first-come, first-served" approach and instead adopt a transparent and non-discriminatory system that unlocks connection capacity held by stalled or inactive projects (often referred to as "zombie projects"). This capacity should be reallocated to projects that are ready to build, based on clearly defined development milestones—a "first-ready, first-served" model.

Member States should adopt a "first-ready, first-served" model with objective criteria with 1) milestones reached for permits, financing and land (these criteria should be discussed and negotiated between system operators and stakeholders and then, approved by the relevant authorities - Member State and/or regulator); 2) contribution to alleviating congestion (e.g. energy storage behind bottlenecks) and 3) Role in the clean energy transition or system flexibility. The hierarchy between those three types of criteria could also be discussed and fine-tuned on the Member State level among TSO/DSO, regulators, policy-makers and energy stakeholders.

5. Transparency on grid hosting capacity

Transparency on grid hosting capacity in respective areas together with applicable connection charges can steer investment decisions into locations with less congestion or with expected grid development. In this context, the Grids Action Plan mandated the EU DSO entity and the ENTSO-E to come forward with harmonised definitions for available grid hosting capacity for

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system operators and to establish a pan-EU overview of grid hosting capacity maps and websites.

5.1 Do you consider existing actions on grid hosting capacity on a EU level sufficient?

☐ Yes

X To a certain extent

☐ No

☐ No reply

5.2 Please elaborate which elements should be improved.

Answer: Members States should continuously update and make public grid hosting capacity maps, which should include DSO-level data, provide hosting capacity forecasts (for energy storage specifically), not just current status and harmonise formats and terminology across Member States.

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About EASE

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

For more information please visit www.ease-storage.eu

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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.

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