

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

Fields marked with \* are mandatory.

## Introduction

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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

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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](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

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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

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

- Individual
- Organisation
- Company
- Public Authority
- Other

\* Name of the company/organisation

RECS International

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

RECS International is a non-profit members' organisation with the mission to create an open, international renewable energy market, facilitated by commonly accepted and harmonized tracking systems. RECS International is an expert in the use of electricity attribute tracking mechanisms.

\* Please enter your email address

secretariat@recs.org

\* 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

\* Please specify 'Other':

EU/EEA/Switzerland

\* 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

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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 cost price of renewables has decreased substantially since the implementation of RED thanks largely due to the volume stimulus resulting from national support systems. This change in the cost for RES now allows renewables to compete on a fair and open market with other technologies. In this aspect the RED was effective in allowing for significant volume growth but it was not efficient in doing so. As such the current RED is not a solution for the long-term stability of the electricity industry or renewables growth. The production-sided national support systems have created significant

market distortions that have had an enormous impact on the wider aspects of competition, infrastructure and investment stability as well as job security within the industry. What the last 6-years have taught us is that financial support must not be based upon the production of a commodity but on the consumption of a commodity. This would force electricity producers and project developers to look not for the highest national subsidy for their production but the most efficient location to produce, taking into account factors such as resource availability, grid-connection, physical electricity prices and consumer choice for the electricity product.

The focus on consumer choice for electricity products is already regulated at the EU-level through disclosure regulations. While these disclosure regulations need to be strengthened this remains the basis for continued consumer-driven choice for renewables and growth in the market for Guarantees of Origin (GOs). The market for GOs – the EU semi-regulated principle mechanism for adhering to disclosure regulations – reached 375-TWh of issuance and cancellation in the 20 European Energy Certificate System (EECS) Standard adherent countries. The GO combined with the Residual Mix needs EU support as this is the only reliable method available to provide product information to all electricity end-users about the origin of their electricity. The GO system and the component Residual Mix calculation are simple but robust systems ensuring consistent consumer choice in Europe. The developments in national disclosure regulation have led to a strong and growing market for renewable electricity products and as consequence the GO as the electricity tracking mechanisms. Even without the necessary EU-link between GOs and disclosure the market for GOs consistently grows by 20% per year.

The current lack of support for consumer choice of electricity products is troubling. Consumers of all sizes – even if together 40% purchase renewable products, such as is the case in the Netherlands – are not reflected in national reports and completely ignored as a result in decision making. The reporting structure in Europe focuses on national RES production, while national RES consumption (national GO consumption plus the Residual Mix) is at least of equal importance. Countless initiatives, including most importantly RE100, must continually work against this focus on national production while encouraging increased consumption by corporate and household electricity end-users. It is one of our suggestions that the European member states report next to their national RES production statistics also national RES consumption statistics. In this way consumers can see the effect of their purchases on national statistics and know that their procurement of renewable technologies does not go unnoticed by national and international policy making authorities. These statistics are already available and will have nearly no costs to implement.

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 type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Regional consultations on renewable energy policy and measures are required	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" 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 type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
The Commission provides guidance on national renewable energy strategies	<input type="radio"/>	<input type="radio"/>	<input checked="" 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*

RECS International is of the opinion that stable and trustworthy markets are the most important aspect for the greater stability in the electricity industry and for all investors. Investors can be secure in their decision to develop RES if the price for electricity and the price for the electricity products (sold via the GO) are both stable. In addition it is critical to consider carbon pricing as a reliable, market-based mechanism to reduce the financial gap between RES and other production technologies.

National subsidy schemes, as they are currently designed, have led to significant market distortions on both the electricity price, the electricity product and the EU-ETS as carbon pricing mechanism. Under the current support schemes decisions to invest in renewables are heavily dominated by a single factor, the guaranteed price received from national support systems, a cost for which the taxpayer is ultimately responsible. In the future, investment decisions should be based equally on a number of different factors, including: The price of the electricity (including factors such as grid-connection, area physical electricity demand and EU-ETS price influences), potential EU-wide subsidy systems and the influence of consumer choice for specific electricity products.

RECS International believes that from an investors point of view long-term stability of prices is the most crucial aspect in providing competitive and efficient RES growth as well a stable electricity industry.

Recognizing and making use of consumer choice for electricity products has been completely ignored in the current electricity market and RED directive. The choice for renewables is completely voluntary and yet still it has grown in the last 5-years to include significant volumes of electricity. Providing the consumer with the ability to influence the market for RES means that the European policy makers must recognize and help stimulate consumer choice for renewables. This can best done at the EU-level. EU policy makers need to make the Guarantee of Origin and the component Residual Mix the only instruments that can be used to meet disclosure regulations. In doing so Europe will encourage growth for this instrument and eliminate leakage from member states with poor national disclosure regulations.

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 type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Overview of policies and measures in place and planned new ones	<input checked="" type="radio"/>	<input 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 type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Qualitative analysis	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Trajectories for electricity demand including both installed capacity (GW) and produced energy (TWh)					
Measures to be taken for increasing the flexibility of the energy system with regard to renewable energy production					
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					

Please explain.

*3600 character(s) maximum*

Stimulating consumer choice as a mechanism for RES growth needs to be considered in any future policy initiative. We are supportive of an EU-wide harmonized approach avoiding national schemes that unfairly support electricity production within their own borders. These national systems have, in many cases, lacked stability and were subject to frequent and sometimes retroactive changes. These changes created uncertainty in the market and reduced the trust investors had in the system. These national systems are less reliable than EU-wide mechanisms that can provide a fixed support level for the entire EU market. We are concerned however that an EU-wide harmonized approach will be difficult to attain in the current political climate. We stress that a focus on the consumption of renewables would decrease market distortions, increase efficiency and support the development of an single electricity market while still allowing for some national differences.

Currently in Europe renewables are consumed (via the GO as tracking instrument) by individual consumers but this has no effect whatsoever on the production targets of the state where the renewables originated or are consumed. The problem lies in the fact that the consumer focuses on the rights to consumption and the state focuses on the rights to production.

Large corporate consumers have been nervous about participating in the market for electricity products due to their lack of influence on the regulatory market. Put another way, consumers are worried that Europe does not provide them with sufficient influence to move the market for RES. With additional support for consumers to make choices for RES we will engage the electricity end-user and provide them with additional mechanisms to show their support for renewables.

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*

RECS International is strongly supportive of harmonised EU-wide support systems, however, we are concerned that such a system will not be politically feasible with the exception of strengthening the EU-ETS.

It is our primary concern that choosing support schemes based upon the production of RES will lead to market distortions and ignore consumer choice for specific electricity products. For this reason RECS International is of the opinion that we need to focus on the consumer of renewables supporting their choice for various electricity products (always backed by the GO). Such a system would allow individual and corporate consumers the ability to play a role in meeting potential national or EU targets. By focusing on consumption we can allow for national or regional support schemes that do not create market distortions in the electricity sector. The use of GOs as a cooperation mechanism to prove cross-border consumption, where needed for EU-wide or national targets, is a fair and robust mechanism that has proven its reliability over the last 12-years.

The GO mechanism has historically been seen as a threat, delivering renewable power to other countries at the expense of national consumers, however, this could be seen as an export product. Highly efficient locations that have cheap renewables production could see the GO as an export, helping contribute to the EU target of 27% while providing national support as a way of financing and eventual job creation.

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 goal is to stimulate investment decisions based upon a well functioning electricity market. This means the physical production of electricity must be encouraged where resource availability is high, there is sufficient grid connection and/or sufficient demand for the produced electricity.

We support closing the financial gap between renewables and other technologies by means of carbon pricing mechanisms. While providing only indirect RES support, the EU-ETS was a triumph for EU energy policy and should be strengthened as a mechanism to allow renewables to reach cost parity with other technologies. Carbon taxes are another method for carbon pricing which could be implemented EU-wide. These carbon prices however would be counter productive if implemented on national basis.

Ensuring support for renewables that targets growth of RES more directly can be effective and efficient, and does not necessarily need to be EU or regionally harmonized. If direct RES support is focused on encouraging the end-consumer to purchase specific renewable products (always via the GO) it can be inline with market principles and effective at providing additional financial support. Within the framework of an EU consumption target the member state may introduce national solutions to stimulate consumer choice for RES as one of the aspects promoting new investment in renewables.

**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*

Our core principles lead us to believe that all national support schemes with production targets are per definition distortions in the market. Cooperation mechanisms do not go far enough to ensure stable and competitive marketplaces in which investors, governments and taxpayers are treated fairly. With no national support schemes in place and only EU-wide harmonised schemes operational there are no cooperation mechanisms needed. In addition if national support schemes were initiated to encourage consumption of renewables there would not be a need for cooperation mechanisms. In this example consumers would be free to consume renewables from the most cost-efficient locations of production.

**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 checked="" type="radio"/>

Administrative complexities	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" 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 checked="" type="radio"/>
Government driven process, not market driven	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" 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 checked="" type="radio"/>

Other? Please explain.

*3600 character(s) maximum*

Under the current target and support models member states have been opposed to supporting the production of renewables outside of their national borders, we see this through the limited use, if at all, of cooperation mechanisms and joint implementation mechanisms. A policy maker does not want to be responsible for sending national finances abroad for the perceived benefit of another member state (jobs, industry growth and emissions) only to meet national RES targets in return. If we flip this around and provide focus on the consumer we see an opportunity for member states to produce RES as viable and efficient export product. This keeps the benefits in the country and helps meet the EU-wide targets for RES growth.

Consumers of some countries will still choose to purchase local renewables as a show of support for local industry even if these are not the most cost-efficient renewables available on the market.

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*

National support schemes are distortions to the electricity market as the component commodity (the produced electricity) will not be bound by national borders as part of the single market.

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 checked="" type="radio"/>	<input type="radio"/>
EU-level requirements on market players to include a certain share of renewables in production, supply or consumption	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
EU-level financial support (e.g. a guarantee fund in support of renewable projects)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
EU-level support to research, innovation and industrialisation of novel renewable energy technologies	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Enhanced EU level regulatory measures	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Any other ideas or comments, please explain.

*3600 character(s) maximum*

In general we believe in a strong EU-wide policy to support the development and growth of RES however the belief that additional financing is needed for the production of renewables is not logical. In no other industry is it conceivable that governments would support the production of a specific product. With electric cars for example, car manufacturers are not financially incentivised to produce electric cars. In this industry - like all others - consumers are incentivized to purchase electric cars by making their purchase less expensive.

RECS International is of the belief that carbon pricing by making fossil and nuclear more expensive via a polluter pays principle is more logical solution. This is largely accepted by the belief that carbon emissions cannot be without cost. This is also part of the core principle of the EU-ETS. Strengthening ETS is a method to bring renewables to a cost-competitive position with other technologies. This makes the production of renewables comparatively less expensive. Supporting the consumer to purchase renewables (always via the GO), comparatively making the price of renewables less expensive, is a political decision that can be taken at the EU or national level. Both of these mechanisms are inline with an open internal market approach.

Auctions should not be considered as a viable mechanism for post-2020 support. Auctions are just a method to select the best offer within a bidding framework. While an auction at an EU-scale may be functional the question of who should contribute to the fund would need to be worked out.

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*

We fully support the European goal to become number one in renewables. However, this goal must be met correctly to ensure a competitive electricity industry, a competitive electricity price (for all consumers) and a competitive market in which consumers are able to participate. We believe that this can easily be achieved by putting focus on stimulating the consumer and supporting them through the reporting of national RES consumption statistics, and possibly targets, next to the mandate to report national RES production statistics.

Some member states have proven that it is extremely effective to invest directly in renewables production in order to see significant RES volume growth, however it may not have been efficient. This was best seen in Germany between 2009 and 2015. This support drove the market for RES forward, increasing physical volumes and installed capacity while also driving the price per MW for a number of technologies (mainly solar but also wind) to record low prices. At the same time however Germany was working in a counterproductive manner resulting in negative market prices for physical electricity. These negative prices directly influenced investors of RES and in turn required higher national support to stimulate continued RES development from investors.

Having said this we believe that the EU can become number one in renewables if we are able to close the financial gap between fossil and renewable electricity production, in such a way this financial gap is completely closed on an EU-level, not a national level. This will make renewables a success not only in Germany but in the whole of the EU.

In general we also support EFET and EURELECTRIC in their proposals to stabilize the wholesale market for electricity.

## Part 3: Empowering consumers

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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](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](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 type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Appliances or enabler for thermal and electrical storage onsite are too expensive	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Complex and/or lengthy administrative procedures, particularly penalising small self-consumption systems	<input type="radio"/>	<input checked="" 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 type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
The design of local network tariffs	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The design of electricity tariffs	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Other? Please explain.

*3600 character(s) maximum*

Consumers are confronted by a choice, to “make or buy” renewable electricity. We support consumers in either decision they choose and we support them in making the most cost effective choice for their personal or business situation. Consumers with the ability, desire, resources and space to invest in renewables themselves should logically do this. However, consumers who cannot make their own renewables should also be supported in buying renewables from their neighbour, cooperative, town, city, supplier or state.

Recognizing economies of scale is logical and should be encouraged in the future development of RES. Allowing consumers to participate by also purchasing renewables (always guaranteed with the GO) from larger projects is something that should be supported at the EU-level. This is inline with placing all commercial producers and prosumers on a level playing field with each other. Stimulating prosumers is inline with demand-driver consumer markets and it is reasonable to consider exemptions for small installed capacities.

RECS International is not an expert in smart-grids, storage or local network tariffs.

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*

RECS International does not know what the renewable energy potential at the local level is. However it is our opinion that cost-efficient locations should be used for renewables production in order to secure cheap, reliable electricity for use by all end-users as well as ensuring a globally competitive electricity price at the local level.

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 type="radio"/>	<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 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 type="radio"/>	<input checked="" type="radio"/>
Difficulties in clustering projects to reach a critical mass at local level	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Lack of targeted financial resources (including support schemes)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>



Other? Please explain.

3600 character(s) maximum

We must recognize that different local areas in Europe will have different capacities for which they are able to produce renewables. Assuming that every local area will be equally capable of producing renewables at the same cost is not logical. By implementing market principles difficulties in producing locally will influence the price of doing business in that region or area. As such local initiatives will have to recognize, justify or attempt to reduce these costs or choose to produce in a less expensive area.

When we provide influence to the consumer to purchase the electricity product of their choice (via the GO as tracking mechanism) you will see that some consumers will choose for locally produced electricity resources. Choosing for locally produced renewables, can in some local markets lead to significantly higher prices due to the high demand and low supply of these resource (Dutch wind electricity for example). These consumers are within their ability and right to choose for local production if that is their desire. This choice should be stimulated at the highest levels of policy making.

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 type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Supporting local authorities in preparing strategies and plans for the promotion of renewable energy	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Facilitating cooperation between relevant actors at the local or municipal level	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Facilitating access to targeted financing	<input type="radio"/>	<input checked="" 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 type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Harmonized principles for network tariffs that promote consumers' flexibility and minimise system costs	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Other? Please explain.

*3600 character(s) maximum*

It is our opinion that local issues (such as permitting or local infrastructure) should be integrated into the price of electricity. Consumers will naturally choose for cheaper RES production and force local policy makers to reduce the barriers on production as a method of reducing the costs associated with producing RES.

For our thoughts on the relationship between prosumers and other producers please review our answer to Q11.

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*

RECS International is the leading expert on the use of GOs in Europe. It is our belief that the most important aspect to ensure growing consumer choice for RES is to ensure truthful information about the origin of their electricity.

Developments in the GO over the last 12-years have proven the success of this instrument in Europe but also around the world. Europe must feel proud that

they were the initiator of the GO certificate, the first internationally standardized mechanism to provide consumer choice in the electricity market. Today on an annual basis the issuance and cancellation of GOs exceeds 375-TWh from only EECS Standardized GOs. Tens of millions of household consumers and multinational corporations use these certificates - both directly or through their supplier - as the primary mechanism to provide product choice in the electricity market. We must improve this mechanisms in three primary ways to ensure it remains a viable solution for consumers in the future.

1. The GO as the primary mechanism for disclosure - Disclosure is regulated in Europe in the Electricity Directive (2009/72/EC) however it is unclear how the disclosure figures are calculated in each member state. Linking disclosure and the GO, as well as regulating these in the same directive, is a logical step to bring clarity to both of these instruments. GOs or component the residual mix must be the factual basis for all information to consumers about their electricity product. The residual mix, just as the GO, must be coordinated at the European level for the benefit of all consumers and avoidance of double claiming.

2. European Energy Certificate System (EECS) Standard - While a majority of member states are adherent to the EECS Standard held by the Association of Issuing Bodies (AIB) this is not the case for all member states. We are concerned that the lack of EECS implementation across Europe is confusing the consumer and harming development in consumer choice. All GO systems must adhere to a standard making the national systems electronically compatible.

3. Distinction from physical electricity flows - It is extremely important that the consumption of GOs be detached from the requirement to delivery physical electricity flows. The mandate to deliver proof of physical delivery goes against the principles of electricity itself, logical understanding of how the electricity markets operate and leads to confusion of many electricity end-users. In addition since this issue is primarily a concern in only one member state it serves to provide barriers to the single-market and impede consumption of GOs originating from neighbouring countries.

Beyond these basic elements we strongly support that the GO system be implemented for all technologies at the request of the producers, that carbon information be delivered with the GO and that the GO registries be opened to all market players. In some locations we see that registries are restricted to nationally registered institutions which is against single market rules and the principles of the European treaty. In other cases only certain companies, such as electricity suppliers, are able to open registry accounts. This significantly limits the ability of large-scale consumers to provide themselves with the electricity product of their choice.

Lastly, the ability to restrict GO issuance due when and if a producer receives support should be harmonized across all member states. Harmonized rules for the issuance of GOs create a level playing field for consumers to purchase RES in all member states.



## 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 type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

Lack of administrative capacity and/or expertise/ knowledge/information at the national and local level	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Lack of energy strategy and planning at the national and local level	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Lack of physical space to develop renewable heating and cooling solutions	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" 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 type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" 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 type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Lack of targeted financial resources and financing instruments	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Lack of definition and recognition of renewable cooling	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" 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 type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Lack of mapping tools to identify the resources potential at regional scale with local renewable energy	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Lack of tools and information to compare the lifecycle	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

costs of the various alternative heating and cooling alternatives					
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*

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 type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" 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 type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Measures supporting best practices in urban planning, heat planning, energy master planning, and project development	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Criteria and benchmarks for promoting district heating and cooling taking into consideration the local and regional conditions	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Nearly zero-energy building (NZEB) standards to include a					

mandatory minimum use of renewable energy	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Including systematically renewable energy production in buildings' energy performance certificates	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
The promotion of green public procurement requirements for renewable heating & cooling in public buildings	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Heating and cooling equipment installers should present renewable energy alternatives when asked to replace fossil fuel heating and cooling equipment	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" 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 type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" 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 type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Targeted financial measures	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" 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*

## Part 5: Adapting the market design and removing barriers

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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 checked="" type="radio"/>
Shorter trading intervals (e.g. 15 min)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Lower thresholds for bid sizes	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Risk hedging products to hedge renewable energy volatility	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" 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 checked="" type="radio"/>
Introduction of longer-term transmission rights (> 3 years)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Regulatory measures to enable thermal, electrical and chemical storage	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Introduction of time-of-use retail prices	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" 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 checked="" type="radio"/>

Any other view or ideas? Please specify.

*3600 character(s) maximum*

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*

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 type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

Transparent and foreseeable grid development, taking into account renewable development and integrating both TSO and DSO level and smart technologies	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Predictable transparent and non-discriminatory connection procedure	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Obligation/priority of connection for renewables	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Cost of grid access, including cost structure	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Legal position of renewable energy developers to challenge grid access decisions by TSOs	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Transparency on local grid congestion and/or market-based incentives to invest in uncongested areas	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" 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*

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*

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 type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Online application for permits	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
A defined maximum time-limit for permitting procedures, and effective consequences if deadline is missed	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" 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 type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" 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 type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" 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*

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*

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 type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>



Cost of compliance	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
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Please explain. How could the administrative burden and cost of compliance be reduced in the period after 2020?

*3600 character(s) maximum*

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*

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

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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 type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Reduce dependency on oil imports	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Increase diversification of transport fuels	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Increase energy recovery from wastes	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Reduce air pollution, particularly in urban areas	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" 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 type="radio"/>	<input checked="" 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*

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*

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 type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

Increased access to alternative fuel infrastructure (such as electric vehicle charging points)



Any other view or ideas? Please specify.

*3600 character(s) maximum*

## Contact

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