

## **Response to EC Consultation on streamlining of planning and reporting obligations as part of the Energy Union governance**

4 April 2016

IFIEC Europe representing energy intensive industrial consumers where energy is a major component of operating costs and directly affects competitiveness, welcomes the Commission's efforts to better safeguard achieving the objectives of the Energy Union through better planning, reporting and governance regulation without implementing additional mandatory goals.

However, the consultation lacks one important aspect of the Energy Union package that IFIEC Europe criticised already before: the focus on global industrial competitiveness with regard to energy costs. Therefore, we see the need to respond to this consultation by sending in this paper rather than to use the online questionnaire that does not allow for options to bring in this particular point.

The five dimensions of the Energy Union package are indeed representing important challenges and objectives. However, the highly important element of competitiveness related to energy prices and costs as well as affordability is missing, but must be seen as an inherent element of each of the five dimensions.

IFIEC Europe urges the Commission to add this issue into planning, reporting and governance regulation in order to give it the importance it deserves. That means e.g. in detail:

- Q10 must rate the influence of “energy competitiveness, prices and costs” as “very important” as well as the aspects of “reindustrialisation”.
- The same applies to Q 21, Q 24 and Q 29.

Transparency of reporting on the additional costs charged to energy consumers through gas or electrical systems should be improved. In particular, a separate reporting of the subsidies given to finance the development of renewable energies would be an efficient input for the Energy Union to propose legislation aiming to safeguard the global competitiveness of European intensive industry and to implement also an intra EU level playing field.

In order to reduce administrative burden, information related to energy or greenhouse gas emissions should be reported only once by industry and in a harmonized way within the EU. IFIEC Europe calls on Member States to reuse already reported information to fulfil their reporting obligations instead to ask industry to report several times the same information in different ways.

Developing information exchange amongst Member State on interconnections, security of energy supply, renewables backup and network balancing in a more coordinated way would be an efficient manner to realize an energy policy that has a balanced foundation on the three

aspects : economy, sustainability and security. The EU Commission also has to consider the aspects of energy competitiveness and give it the necessary status in the planning, reporting and governance regulation.

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