

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

Fields marked with * are mandatory.

Introduction

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

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

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

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

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

Evaluation of current policies

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

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

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

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

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

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

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

Context and challenges

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

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

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

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

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

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

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

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

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

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

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

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

Part 1: Information about the respondent

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

- Individual
- Organisation
- Company
- Public Authority
- Other

* Name of the company/organisation

IFIEC Europe

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

IFIEC Europe - the International Federation of Industrial Energy Consumers represents energy intensive industrial consumers where energy is a major component of operating costs and directly affects competitiveness.

* Please enter your email address

ifiec@ifieceurope.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

* Can we publish your answers on the Commission website?

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

Part 2: General approach

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

For the period after 2020, binding national targets are replaced by a binding EU-level target of at least 27% renewable energy in final energy consumption by 2030 without sectorial targets or binding

targets at national level. A new approach to target achievement therefore needs to be developed, building on the Energy Union Governance and Member States' national energy and climate plans for the period up to 2030, which are expected to include national contributions towards the EU-level renewable energy target.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

3600 character(s) maximum

The climate policy in the electricity generation sector is directed by EU ETS which is aiming at carbon reductions at the lowest cost. The ETS fits into a broader energy and climate policy aiming at guaranteeing secure, competitive and sustainable-energy. Furthermore, RES-E support in many MSs leads to an uncoordinated impact into the functioning of the electricity market with negative consequences for stability and huge increase of system costs. Both negative effects are highly impacting energy intensive industries and their competitiveness. It is not sufficiently taken into account that intermittent renewable energies are not contributing to increasing security of supply and are leading to an increased need for backup and storage technologies, which are currently not sufficiently developed. So there is clear evidence that RED also has implied severe challenges to the energy system followed by cost increases for industry, thus hampering competitiveness. One particular example of this is the amount of grid development and reinforcement triggered by large

quantities of intermittent renewable generation, which has broadly raised grid tariffs for consumers. However, the main problem for industry is the threat to their competitiveness by electricity generators' cost pass through of carbon costs. When competitors in other regions of the world are not facing such costs, this leads to a negative impact on the exposed industries. In this context, the development of renewable energy must be in line with worldwide development and with the ability of non-exposed consumers to bear the costs. With an ever growing share of RES-E in the market, It is necessary to focus more on the integration of renewable energy and to phase out on the short term subsidies for RES-E. There has been a clear tendency for overcompensation and focus on high cost technologies in certain Member States with subsidies ranging up to a multiple above the electricity price. Technologies that cost 200 -300 percent more than a product price should not be rolled out at the level of the RES target. Only after the necessary development in innovation that bring down costs and make an economic viable product, higher shares will be introduced automatically into the market.

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 type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Best practice is derived from the implementation of the existing Renewable Energy Directive	<input checked="" type="radio"/>	<input type="radio"/>	<input 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 type="radio"/>	<input checked="" 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

State planning of technology development in the electricity sector (as suggested by the first response option) is neither important nor unimportant but is just a wrong policy approach. Regional approaches (see third response option) make sense as a starting point but are not leading to the most cost-efficient solutions. Therefore, they could only serve for an intermediate phase. A proper support of research and development in innovative, sustainable electricity generation options is the role the state (national and EU) should play in order to help realize a balanced climate friendly energy system. For many investors, renewables in Europe have been seen as an "invest and forget" class of assets - with upfront capital outlay opening up a long term and (fairly) dependable cash flow. In REDII, we expect that renewable technologies will no longer be cushioned from wholesale price risks. The EU should focus on a coherent energy policy that ensures targeting all objectives of a sound energy policy: security of supply and competitive energy together with energy and climate objectives. An overall view of all aspects of energy policy should be followed. Targets should be defined bottom up based on existing potential and cost-efficient technologies. An active policy on the phase out of support systems is necessary in order to have a well-functioning electricity market. Renewables should be integrated into the market, rather than phasing out the target of developing a functioning market. Within the context of a recently liberalised electricity market, a governmental obligation to achieve a predefined RES-E target is incompatible with an immature liberalised electricity market. Indeed, subsidies for 20-40% additional RES-E capacities (and up to 50-60% RES-E in 2030), having close to zero marginal costs, and hence distorting the market and provoking new subsidies for all other technologies is not a sustainable market model for Europe. The development pace of intermittent RES-E must be in line with the development pace of electricity storage solutions and demand response.

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 type="radio"/>	<input checked="" 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 checked="" type="radio"/>	<input type="radio"/>	<input 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 type="radio"/>	<input checked="" 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)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Measures to be taken for increasing the flexibility of the energy system with regard to renewable energy production	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Plans for achieving electricity market coupling and integration, regional measures for balancing and reserves and how system adequacy is calculated in the context of renewable energy	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please explain.

3600 character(s) maximum

It is the role of energy policy not only to have the climate and environmental perspective of the energy system in mind, but to take a balanced approach to the three objectives of any energy policy which also includes security of supply and competitiveness, next to the sustainability aspect. The EU objective of establishing an internal market for energy within the EU is challenged by the national approaches to support RE, and we have to observe setbacks in the development of the internal markets based on this. However, we urge the commission not to withdraw from the plans and efforts to realize the internal energy market, going hand in hand with the phase out of subsidies for RES and their integration into the market. The trajectory until 2050 cannot be set by policy, but will be influenced by a huge variety of factors. Therefore, flexibility of the whole system is necessary to develop a reliably functioning energy system built on RES. Energy consumers are central to the energy system: this means that supply should be adequate to meet the demand.

Technological developments are necessary to supply energy in the context of the 21st century.

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

The subsidiarity principle should be observed in line with the mandate situation in the EU which gives MSs the sovereignty to decide on the energy mix, which is also in line with the diversity in the resources, geographical and climate situations of the different MSs. Best practice solutions however should be pushed and supported within the cooperation of the MSs in the EU. A harmonisation of EU-wide level of support schemes would be dependent on a better functioning internal market and should only be implemented if it has a positive impact for consumers of electricity. A harmonisation of Res support should as a focal point consider a phase out of subsidies and should lead to competitive electricity (decrease of the total system costs) and to security of supply .

A focus on innovation not solely in renewable energy technologies, but as importantly in storage technologies and demand response solutions, is necessary.

For electric power one important step for cost optimization of RES-E production is to look for the most efficient locations to generate them. Therefore, the RED has to be based on a bottom up analysis of cost efficient potential.

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

What hinders the introduction at the EU wide and/or regional scale?:
Harmonization is a broad term, whereas it is unclear how far and which elements would be harmonized. Harmonization/Regionalization must in any way not lead to a prolongation of support schemes, since support schemes in general are not desirable for the future, at least outside the scope of supporting R & D. EU-wide schemes are hindered by national sovereignty, divergence in the resources as well as the geographical and climate situation within the MSs.

How could such mechanisms be activated and implemented?:
Stepwise approach by learning from best practice solutions.

What would be their scope?:
Support of R & D, choosing technology neutral approaches and allocating funds on a competitive basis. Thereby parallel to RES also storage and demand flexibility must be taken into the focus.

Who would finance them?:
Financing it via the energy price by just adding surcharges is very harmful to an important part of the EU economy, namely energy intensive businesses. It is therefore necessary to find the most cost-efficient solutions to keep costs as low as possible. Promotion of the most geographically efficient technologies can only proceed smoothly when the European electricity market is tightly connected and harmonized. This is achievable in a longer term only. In the meantime a diverse, often sub-optimal picture will remain but should be minimized in scale and timing.

How could the costs of such measures be shared in a fair and equitable way?:
Until renewable energy is competitive, the cost impact of support schemes on consumers facing international competition should be limited and it should not jeopardize the global competitiveness of energy intensive industries.

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

Cooperation mechanisms have not been very successful up to now. Cooperation mechanisms can still be possible and should allow for a more cost efficient renewable energy policy, leading to a system providing for sustainable and competitive energy, as well as security of supply. Cooperation mechanisms can support the tapping of potential of RES at the most optimal geographical place. Attention must be given on how to handle burden (backup, subsidies, grid costs) and benefits (lower commodity price) in cooperation mechanisms. A well designed EU-wide electricity market and a bottom-up approach is a stepping stone for cooperation mechanisms.

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

Other? Please explain.

3600 character(s) maximum

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

3600 character(s) maximum

Attention must be given on how to handle burden (backup, subsidies, grid costs) and benefits (lower commodity price) in cooperation mechanisms.

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 checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
EU-level requirements on market players to include a certain share of	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

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

Any other ideas or comments, please explain.

3600 character(s) maximum

EU measures should concentrate on measures that target to reduce the total system costs and on easing the burden on energy costs of consumers in global competition. The revision of the RED should lead to a swift phase out of subsidies for mature technologies, the integration of RES technologies into the electricity market, a more focused approach on innovation for all aspects of the electricity system (incl. storage). Rather than a fast roll out of the existing, but economically and technically not optimal technologies, the EU now should concentrate mainly on technological and economic improvements of the technologies available and on R&D for potential new technologies.

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

Whereas the EU has set the pace in developing RE in the past, the world now, after COP 21 in Paris, has acknowledged the necessity to combat global warming and to use RE as an important option to do so. So now, the volume increase has to come mainly from regions in the world that are likewise or even more important in a successful combat against global warming due to their high carbon emissions. The EU now should concentrate mainly on technological and economic improvements of the technologies available and on R&D for potential new technologies and become number one in this respect.

Part 3: Empowering consumers

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

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

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

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

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

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

Under the RED, a Guarantees of Origin (GO) system provides an EU wide mechanism to inform electricity consumers as to the renewable nature of the electricity that they use, enabling green tariffs to develop but also being criticised for not sufficiently linking these tariffs to real incentives for additional new green energy deployment. It should be assessed to what extent the current rules for electricity disclosure (incl. GO) can be improved to reflect best practice in Member States' implementation and help consumers choose a more sustainable energy consumption pattern.

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

[2]

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

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

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

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

	Very important barrier	Important barrier	Not very important barrier	Not important barrier	No opinion

Self-consumption or storage of renewable electricity produced onsite is forbidden	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Surplus electricity that is not self-consumed onsite cannot be sold to the grid	<input type="radio"/>	<input type="radio"/>	<input checked="" 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 checked="" type="radio"/>	<input type="radio"/>
Appliances or enabler for thermal and electrical storage onsite are too expensive	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Complex and/or lengthy administrative procedures, particularly penalising small self-consumption systems	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Lack of smart grids and smart metering systems at the consumer's premises	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The design of local network tariffs	<input 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

EC is using the term "empowering consumers", however consumers are considered to adapt their demand totally to the development of intermittent RES-E which is the opposite of 'empowering'. This is contradictory especially taking into consideration that electricity is a basic need. Therefore, adequacy should at all times be ensured, but not at the expense of the consumers' right. Surcharges that are levied upon self-produced energy are an important barrier to self-generation. Moreover, high grid fees for sporadic grid use (e.g. in case of maintenance of the self-generation unit) are a disincentive to self-generation. Power input when there is no demand has no value in the market. Interventions into the market must not lead to a situation that electricity in such situation is given a value which it has not.

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

This highly differs from region to region.
Due to the fact that the national RED-targets were not based on a bottom-up potential, but on top-down criteria such as GDP and ambitions, costly policy measures were put in place for MSs with limited potential. These policy measures and the lack of timely adjustment have led to overexploitation of uneconomical RES potential like solar panels in countries with low sun intensity. This is mainly due to policy instruments that allow an overcompensation of RES technologies, without taking into account the technology improvement pathway and the total system costs. The limited potential, the exuberant subsidizing of RES and the lack of impact assessment of the renewable energy mix increased the costs of the implementation of the target, leading to total system costs far beyond cost effectiveness.
To reduce the system cost and integrate renewables, further development of competitive solutions for renewable heat and electricity, storage and demand response, metering and active participation of local prosumers, and short term phase out of subsidies are necessary.

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 type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Lack of energy strategy and planning at local level	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" 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 type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Lack of targeted financial resources (including support schemes)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>



Other? Please explain.

3600 character(s) maximum

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 checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
EU-wide right to generate, self-consume and store renewable electricity	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Measures to ensure that surplus self-generated electricity is fairly valued	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Harmonized principles for network tariffs that promote consumers' flexibility and	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

minimise system costs					
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Other? Please explain.

3600 character(s) maximum

The integration of RES into a comprehensive internal market strategy, including grid infrastructure, and a functional vision of the electricity market in the future.

Grid tariffs should not hinder flexibility, but shouldn't intervene with a price signal and a subsequent reaction in the market either. Grid tariffs and market should stay separated.

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

A higher rate of flexibility is asked from the consumer while total energy costs (subsidies, grid costs and backup) are increasing. Empowering the consumer for more market participation to allow further development of (intermittent) renewable energy should include more transparency on the intermittency issue. Providing information on when conventional plants are providing electricity in absence of solar and wind will show the importance of backup and storage solutions and genuinely 'empower' the consumers.

Part 4: Decarbonising the heating and cooling sector

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

Efficient ways need to be found to stimulate switching from fossil fuels to renewable heating and cooling and hot water generation in the large number of EU homes with individual heating equipment. The existing nearly-zero energy building (NZEB) standards (mandatory from 2021 for all new

building) include obligations for minimum use of renewable energy. It appears however that this is insufficient to further encourage the use of renewables at the building level. It could therefore be considered whether the NZEB rules should be made more ambitious to also include an obligation to use renewable energy heating (including water heating) and cooling in the existing building stock, effective if and when the building is subject to major renovation or the heating system is replaced. Measures will also need to encourage a shift in consumer behaviour, perhaps through better information about renewable energy alternatives from heating equipment suppliers and installers, and encourage investment in energy storage and demand-shifting capacity.

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

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

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

	Very important barrier	Important barrier	Not very important barrier	Not important barrier	No opinion
Real or perceived incoherence in existing EU policies (such as RED, EED and EPBD)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Lack of administrative capacity and/or expertise/ knowledge/information at the national and local level	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Lack of energy strategy and planning at the national and local level	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Lack of physical space to develop renewable heating and cooling solutions	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Lack of requirements in building codes and other national or local legislation					

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

Other? Please specify and explain.

3600 character(s) maximum

In the heating and cooling sector the activity options in the EU are still very high - especially in the domestic sector, because of missing focus on that in the past. Therefore, more R&D is needed to provide for breakthrough technologies in RES - heating and cooling.

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 checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Requirement for energy suppliers and/or distributors to inform consumers of the costs of heating and cooling and to offer renewable heating and cooling solutions	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input 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 checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Measures supporting best practices in urban planning, heat planning, energy master planning, and project development	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Criteria and benchmarks for promoting district heating and cooling taking into consideration the local and regional conditions	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Nearly zero-energy building (NZEB) standards to include a mandatory minimum use of renewable energy	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Including systematically renewable energy production in buildings' energy performance certificates	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The promotion of green public procurement requirements for renewable heating & cooling in public buildings	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Heating and cooling equipment installers should present renewable energy alternatives	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

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

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

3600 character(s) maximum

EU should further focus on the deployment of CHP installations for heating purposes. However, no additional requirements or obligations should be set up. On the other hand, grid tariffs and legislation should not penalise but incentivise the use of CHP. By using CHP industry is frontrunner in the decentralised energy system model EU adopts. This should be supported instead of discouraged.

Furthermore, effective policy measures need to trigger end consumers to invest in renewable heating or cooling. But to make this possible, technologies must be available in an economical way for the consumers in order for them to be able to use them. For industry, due to its different heat needs, only limited adequate RES heat is available yet. Therefore, policy makers need to combine actions to set up targeted financial incentives that should focus on research and innovation to develop cost efficient technologies. In addition, consumers should be made aware of all options existing for heating and cooling, including their technical and financial advantages and constraints.

Part 5: Adapting the market design and removing barriers

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

Changes in the market provisions are of utmost importance in order to build a market which is fully fit for renewables. For example, the establishment of liquid and better integrated short-term intraday and balancing markets will help to increase flexibility and help renewable energy producers to integrate in the market and compete on an equal footing with conventional energy producers, while the strengthening of the EU ETS can contribute to reinforce the long term investment environment.

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

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

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

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

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

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

Any other view or ideas? Please specify.

3600 character(s) maximum

Reservation of cross-border-capacity for short term-markets would hamper trade in general. Cross-border-capacity should be allocated by the market, not through reservation.

EU energy intensive industry is in need of competitive and secure energy to be able to compete in an internationally competitive environment. This is the aim of the liberalisation and the implementation of the 3rd package. However, the current market design is a hybrid system where a large part of the capacity is subsidized because of the EU low carbon ambition and its implementation by a renewables target and ETS-system. The hybrid market system with subsidies for generation capacity (RES subsidies), backup capacity (CRMs/strategic reserves), carbon pricing and increased transport costs on top of the commodity price are not delivering the goal of competitive energy costs nor providing the necessary adequacy signal at the moment.

EU should make a clear choice either for the market with a marginal price system but without subsidies or for a steered system but without a marginal price system. In lack of such a clear choice, consumers will keep on paying parallel taxes and levies, subsidies and transport on top of a commodity price, driven by a (ETS price boosted) marginal price. This combination will not provide for competitive electricity prices for industry.

Additionally, equal responsibilities for all generation actors are necessary for a non-discriminatory treatment between energy producers.

Next to additional provisions for security of supply, it is necessary that transparency should be guaranteed on the impact of different technologies on the total system costs.

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

In principle, there is no need for exemptions on these responsibilities. If smaller plant operators can not actively fulfil their balancing role, they can contract the services of specialised balancing service providers. Even more, BRPs' responsibility should be strengthened in order to cope seriously with non-secure RES-E generation.

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 checked="" type="radio"/>	<input type="radio"/>
Transparent and foreseeable grid development, taking into account renewable development and integrating both TSO and DSO level and smart technologies	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Predictable transparent and non-discriminatory connection procedure	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Obligation/priority of connection for renewables	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input 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 checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Transparency on local grid congestion and/or market-based incentives to invest in uncongested areas	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
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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

As for curtailment, no compensation is necessary whenever supply is larger than demand. In that case, the energy is simply not requested by consumers, compensation would be contrary to the market principle. Grid development, connection procedures, RES connection obligation/priority: no specific rules are needed for RES. TSO/DSO practices must be non-discriminatory. RES-E should not be treated in a discriminatory way, whether it is positive (for example priority access) or negative. This is of utmost importance for the integration of RES-E into the market. When looking at the above mentioned areas, stronger EU rules for RES-E deployment would only lead to additional discrimination and hence an even more decreased integration of RES-E into the market. Cost of grid access, legal position of RES developers: access tariffs and legal position of grid users must be non-discriminatory. Transparency is a good thing for all grid users and market actors.

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

Electricity from Renewable Sources with low (close to zero) marginal costs should benefit from their position in the merit order. The merit order based on marginal generation costs for each production unit is the only fair basis for energy dispatching. Introducing exceptions would be contradictory to the market principles and lead to higher system costs for end consumers. Support measures must have a digressive and temporary character to ensure comparable roles of any generation modes for the functioning of the system. All related additional cost elements should be properly specified, assessed and made transparent to the public.

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 checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Harmonisation of national permitting procedures	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input 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 checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

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

3600 character(s) maximum

A non-discriminatory approach is required for Res-E which has already a significant market share.

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

An appropriate coordination between RES project and grid owner is important in order to clarify the time schedule, grid cost exposure etc. Predictable and efficient principles for grid cost sharing between different grid customers is essential, especially for competitive industries as power production and power intensive industry. Harmonized methodology for efficient grid tariff for the power intensive industry should be implemented in the EU energy regulation based on the properties and the contribution of the power consumption profile to the transmission system, taking national considerations into account. With its stable base load consumption pattern, this industry represent a substantial contributor of stability services to the transmission system.

Infrastructure barriers should be removed equally for all types of producers (not only RES-E).

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

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

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

3600 character(s) maximum

Any support of RES-E and their integration into the system must be cost-efficient. Support measures must have a digressive and temporary character to ensure comparable roles of any generation modes for the functioning of the system.

All related additional cost elements should be properly specified, assessed and made transparent to the public.

Industry imposed to international competition must be exempted from these cost increases. State aid rules must allow for hardship regimes.

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

By making it competitive, phasing-out subsidies.

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

Decarbonisation and the replacement of fossil fuels is particularly challenging in the transport sector. 94% percent of EU transport relies on oil products, of which 90% is imported and represents a growing share of carbon emissions. Against this background, the October 2014 European Council invited the European Commission to further examine instruments and measures for the transport sector, including the promotion of energy from renewable energy sources.

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

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

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

	Very successful	Successful	Not very successful	Not successful	No opinion
Contribute towards the EU's decarbonisation objectives	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Reduce dependency on oil imports	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Increase diversification of transport fuels	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

Increase energy recovery from wastes	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Reduce air pollution, particularly in urban areas	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Strengthen the EU industry and economy competitiveness	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Stimulate development and growth of innovative technologies	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Reduce production costs of renewable fuels by lowering the level of investment risk	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Facilitate fuel cost reduction by integration of the EU market for renewable fuels	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input 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

The potential development of sustainable renewable fuels should be based on a bottom up approach, determining system costs and feasibility. System costs include the need for research and innovation, the need for an adapted infrastructure (engines, fuel/charge stations,...), whereas feasibility is strongly linked with technical constraints and security.

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)	<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

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