

CONSULTATION ON STREAMLINING OF PLANNING AND REPORTING OBLIGATIONS AS PART OF THE ENERGY UNION GOVERNANCE

Fields marked with * are mandatory.

What this consultation is about

The Commission's State of the Energy Union presented on 18 November 2015 states that "[t]he Energy Union needs a reliable and transparent governance process, anchored in legislation, to make sure that energy-related actions at European, regional, national and local level all contribute to the Energy Union's objectives." This corresponds to similar calls from the European Council and the European Parliament[*].

The State of the Energy Union also underlines that "[i]ntegrated national energy and climate plans, addressing all five dimensions of the Energy Union, are necessary tools to have more strategic planning", and that "[i]n order to track progress, a transparent monitoring system needs to be put in place based on key indicators as well as on Member States' biannual reports concerning progress made on their national plans". This builds further on the Commission's Communication on the Energy Union from February 2015, which explained that a purpose of the governance process for the Energy Union is to "streamline current planning and reporting requirements, avoiding unnecessary administrative burden".

In this context, the present consultation seeks stakeholders' views on current planning and reporting arrangements in the energy field, and on how these could be improved to better serve the objectives of the Energy Union and to reduce administrative burden. An overview of existing planning and reporting obligations in the energy sector concerning the Member States as well as the Commission is available here: [COM planning and reporting obligations \(energy field\)](#); [MS planning and reporting obligations \(energy field\)](#); [COM planning and reporting obligations \(climate field\)](#); [MS planning and reporting obligations \(climate field\)](#).

The responses to the public consultation will feed into the Commission's evaluation and fitness check of existing planning and reporting obligations (a REFIT initiative in the Commission's 2015 Work Programme) as well as into the Impact Assessment for the Commission's proposal(s) for streamlining of planning and reporting in the energy field foreseen for late 2016, as announced by the State of the Energy Union.

The consultation as well as the initiatives it will contribute to should be understood in the broader context of the Energy Union strategy; the Commission's guidance to Member States on national plans from 18 November 2015, and the Council's Conclusions on Energy Union governance from 26 November 2015 – which underscore the need for holistic national plans that address all five dimensions of the Energy Union in an integrated way.

This public consultation also relates to the preparation of other initiatives to implement the Energy Union foreseen for 2016 (notably initiatives on energy efficiency, renewable energy and electricity market design). For other completed and ongoing public consultation processes and their outcomes, see: <http://ec.europa.eu/energy/en/consultations>.

[*] REF to EUCO October 2014 and March 2015; EP 15 Dec 2015.

The questionnaire is structured as follows:

- A. Respondent's profile
- B. Evaluation of existing planning obligations
- C. Evaluation of existing reporting obligations
- D. Options for streamlining planning and reporting obligations
- E. Options for the governance of the Energy Union

Questions marked with an asterisk (*) are mandatory.

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A. Respondent's profile

Please provide information to help us build your profile as a respondent. In accordance with Regulation 45/2001[*], all personal data collected through this survey will be kept securely and will ultimately be destroyed.

[*] Regulation (EC) No 45/2001 of the European Parliament and of the Council of 18 December 2000 on the protection of individuals with regard to the processing of personal data by the Community institutions and bodies and on the free movement of such data, OJ L 008, 12.1.2001, p.1.

A.1 Are you answering as an individual or on behalf of an organisation/institution?

- ☐ I am answering as an individual.
- ☒ I am answering on behalf of an organisation.

A.2 Please specify your main field of activity.

Please tick the appropriate field. Only one choice is possible:

- ☐ Individual citizen
- ☐ National public authority (central or local government)
- ☒ Private company/ Industry association
- ☐ International organisation
- ☐ Workers' organisation/trade union
- ☐ Research organisation/university
- ☐ NGO
- ☐ Other interest group organisation/association

Other - please specify:

*

A.3. Please indicate your country of residence/establishment:

If answering as an individual, please provide your country of residence.

If answering on behalf of an organisation/institution, please provide the country of establishment of the organisation/institution.

Please tick the appropriate field, only one choice is possible.

- ☒ Austria
- ☒ Belgium
- ☒ Bulgaria
- ☒ Croatia
- ☒ Cyprus
- ☒ Czech Republic
- ☒ Denmark
- ☒ Estonia
- ☒ Finland
- ☒ France
- ☒ Germany
- ☒ Greece
- ☒ Hungary
- ☒ Iceland
- ☒ Ireland
- ☒ Italy
- ☒ Latvia
- ☒ Liechtenstein
- ☒ Lithuania
- ☒ Luxembourg
- ☒ Malta
- ☒ Netherlands
- ☒ Norway
- ☒ Poland
- ☒ Portugal
- ☒ Romania
- ☒ Slovenia
- ☒ Spain
- ☒ Sweden
- ☒ Slovakia
- ☒ Switzerland
- ☒ United Kingdom

Other/international - please specify:

*

A.4 Name and contact details

- ☐ I prefer to provide a general comment only. Please provide your general comment in the box below. (up to 2000 characters)
- ☒ I will provide my name and contact details in the boxes below.

[Questionnaire ends here]

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[*] In the interest of transparency, organisations (including, for example, NGOs, trade associations and commercial enterprises) are invited to provide the public with relevant information about themselves by registering in the Interest Representative Register and subscribing to its Code of Conduct. If you are a registered organisation, please indicate the name and address of your organisation and your Register ID number on the first page of your contribution. Your contribution will then be considered as representing the views of your organisation.

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A.5 Received contributions may be published on the Commission's website, with the identity of the contributor. Which publication arrangement would you agree upon?

- ☒ My contribution may be published under the name indicated.
- ☐ My contribution may be published but shall be kept anonymous.
- ☐ I do not agree that my contribution will be published.

B. Evaluation of planning obligations

Existing obligations

The EU energy and climate legislation includes a number of different planning obligations for the Member States. Planning obligations play a crucial role for EU energy policies in e.g. the fields of renewable energy, energy efficiency, security of gas supply, energy performance of buildings, waste management and decarbonisation. The main features of existing planning obligations can be summarised as follows:

- Current planning obligations usually include indicators and projections as an analytical basis as well as policies and measures needed to achieve the plan's objectives;
- Current plans usually cover a specific area of the energy or climate field, but do not necessarily refer to possible overlaps and interactions with other plans in these fields; in some cases templates are provided, which can be either voluntary or compulsory;
- Plans often have to be submitted once, but in many cases a periodical revision or the submission of new plans is required. The process for the adoption of the plans is often left to the discretion of the Member States;
- The role of the Commission varies. In some cases, it monitors plans, in other cases, it analyses plans and is requested to report to the European Parliament and the Council. In some instances the Commission could ask for modifications. Furthermore, it can use its enforcement powers, if the planning obligations are not fulfilled or not all the necessary details/content were provided.

1) How would you rate the following aspects of such planning obligations at EU level?

	Very important	Important	Less important	Not important	No opinion
Coherence of national plans among all EU Member States	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Effective and efficient implementation of EU legislation in the energy and climate field	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Achievement of the EU energy and climate objectives	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Increased certainty for investors across all EU Member States stimulating economic growth as well as research, innovation and competitiveness of the EU	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Better implementation of international commitments by the EU as a whole and by Member States (e.g. concerning the reduction of greenhouse gas emissions)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The Commission is better enabled to provide substantial and useful advice	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

If other, please explain: (up to 1000 characters)

Planning and reporting obligations must be designed in such a way as to ensure the full achievement of our energy and climate policy objectives. Progress towards the attainment of such objectives can be measured only if plans and reports are comparable. This means they must be based on the same template and on a harmonised set of calculation methods and scenarios. Member States must be held accountable for delivering on approved policies and objectives and the EU Commission must be able to effectively enforce the agreed measures and targets; this is why plans and reports should have a strong legal basis and should provide accurate and exhaustive information. The binding character and the comprehensiveness of plans and reports, along with the transparency of planning and reporting procedures, will be key in providing investors with the necessary visibility and certainty. This will in turn decrease the cost of capital of investments, making the achievement of our policy goals cheaper.

2) Are you aware of overlaps or inconsistencies among the existing planning obligations in the same or different areas of the energy and climate acquis? Please provide examples. (up to 1000 characters)

1. MSs are required to plan RES capacity increases but they do not have to plan the decommissioning of polluting and inflexible capacity. In the context of current overcapacities and with a view to decarbonising the energy system and increasing its security, parallel action on both fronts is required.
2. Several EU laws require ENTSO-E and national TSOs to produce grid investment plans and system adequacy forecasts. Calculation methods supporting the national plans and forecasts are diverse. National and EU plans and forecasts do not fully consider official policy scenarios.
3. Scenarios for future GHG emissions, energy use and technologies used to meet the demand are available in several plans stemming from various EU laws. This may lead to inconsistencies. Strangely, at EU level GHG emission reduction targets are not derived from possible efforts in several sectors, e.g. RES and EE, but it is EU GHG targets that define the efforts to be made in the RES and EE sectors.

3) a) Which of the current planning obligations could in your opinion be streamlined[*] into one integrated plan and why? (up to 1500 characters)

Integrated plans would be appropriate for projections and for measures within the Energy Union dimensions WITHOUT targets.

By minimising the number of times projections are made, Commission and MSs would limit mistakes and inconsistencies. The integration of several projections would also make interactions and synergies among the various Energy Union dimensions more apparent. For the sake of transparency and coherence, dynamics in the nuclear sector, which today are described in the PINC reports, should also be included in these plans.

Measures within Energy Union dimensions WITH targets need to be planned and reported on in a very detailed manner. Specific information is indispensable to enable an informed evaluation of the effectiveness and efficiency of policy implementation and to allow the identification of appropriate corrective measures, thus ensuring targets achievements.

Measures in Energy Union dimensions WITH targets should be planned and reported on in separate streams, as high-level, political integrated plans would not be appropriate carriers of technical and precise information. Moreover, if integrated plans were to carry both general and detailed information, they would become very long and illegible and their compilation would require heavy administrative efforts.

b) Are there any planning obligations that should be kept separate from the integrated plan? (up to 1500 characters)

As explained in reply to 3) a) separate planning and reporting streams should continue to exist for measures underpinning the achievement of climate and energy targets. Indeed, these measures need to be illustrated in a very detailed manner and separate documents better serve this purpose than integrated plans.

As the “Mid-term Evaluation of the RED” study points out, in spite of today’s efficient and effective system of NREAPs and biennial reports, information on national measures stemming from the RED is incomplete. This calls for the strengthening rather than the lightening of today’s planning and reporting system in the RES sector in the next decade.

This being said, planning and reporting streams in areas with targets may be streamlined to a certain extent. For instance, measures improving the energy performance of buildings, hence contributing to GHG emissions limitations and to the RES and EE targets achievement, could be planned and reported on in a more consistent and less dispersed manner than today.

c) Are there any planning obligations that could be repealed? (up to 1500 characters)

[*] By streamlining we understand the possibility to integrate planning and reporting obligations resulting from (different) sectorial legislation by reducing possible duplications or gaps in the reporting and planning obligations, thereby ensuring transparency, coherence, relevance, efficiency and effectiveness of the reporting and planning. Furthermore planning and reporting cycles should be harmonised to the extent possible.

4) Which elements/articles of the current planning obligations in the field of renewable energy do you consider indispensable and why? If relevant please, refer to specific [Articles of the Renewable Energy Directive](#). (up to 1000 characters)

Existing RED p&r obligations are proportionate and justified. However, in line with the findings of the “Mid-term Evaluation of the RED” study, we recommend to:

- 1) Make future RED provisions more “measurable”
- 2) Improve completeness of info included in plans and reports
- 3) Strengthen Commission monitoring and enforcement power
- 4) Improve transparency over Commission use of its enforcement power

Indispensable elements of future plans and reports are:

- RES shares, per sectors and technologies;
- RES trajectories;
- Cooperation mechanisms;
- permitting and grid connection procedures;
- RES in buildings;
- support frameworks, including for prosumers;
- priority access and dispatch;
- professional certification and public awareness.

In the absence of national targets, the Commission should produce benchmarks to ensure comparability between and transparency over MS efforts. Binding templates should be used to ensure comparability. Corrective mechanisms ensuring target achievement should be defined at early stage. RES p&r obligations should be adopted before legislation on the Energy Union integrated plans and reports is adopted.

5) Which elements/articles of the current planning obligations in the field of energy efficiency do you consider indispensable and why? Please, if relevant, refer to specific Articles of the [Energy Efficiency Directive](#) and [Energy Performance of Buildings Directive](#). (up to 1000 characters)

All current planning and reporting obligations should be retained and strengthened. Plans should also contain medium and long-term (2030 and 2050) renovation targets. They should more than today show how Member States gradually smarten their building stock, turning buildings into active elements of the energy system. They should show how the uptake of enablers such as demand response, storage and on-site renewables is assured. In particular, they should describe how minimum shares of renewables (to be set by the revised Renewable Energy Directive) will be complemented by an active promotion of innovative solutions – such as building integrated PV – in the Energy Performance of Buildings Directive.

6) Which elements/articles of the current planning in the field of low-carbon development strategies do you consider indispensable and why? (up to 1000 characters)

Low-carbon development strategies should clearly describe how Member States intend to achieve the GHG emissions reduction target for 2030, taking full account of the contribution from both ETS and non ETS sectors. These strategies should also contain an indication of Member States' contribution to the agreed 80-95% GHG emissions reduction target by 2050.

In the power sector where the risk of carbon leakage is limited, plans should present an ambitious and holistic approach: besides the targeted increase of renewables (to be detailed in separate, more specific plans), a detailed plan for the phase-out of fossil fuel subsidies as well as an exhaustive plan for the gradual retirement of coal power stations should be presented.

Finally, these documents should provide a clear indication of how ETS flexibility funds will be used. ETS funds should be made available only to Member States that are on track with the projected increase in RES and EE and decrease in GHG emissions and with the roadmaps for the phase-out of fossil fuel subsidies and for the withdrawal from coal.

7) Which elements/articles of the current planning obligations in the field of infrastructure development (like for example TEN-E) do you consider indispensable and why? (up to 1000 characters)

There is room for streamlining and harmonising existing infrastructure planning obligations. It is important that infrastructure development plans are based on official policy scenarios and on harmonised methodologies. In line with the 2030 EU-wide binding target for RES, future plans should be centred around the assumption that by 2030 almost 50% electricity will be supplied by renewable energies in Europe, particularly solar and wind.

Infrastructure planning at distribution grid level should become more transparent, as the bulk of future production capacities will be connected to low and medium-voltage networks. Plans should also focus on the increase in interconnection capacities, with a view to achieving the indicative interconnection targets. Finally, plans should clearly and comprehensively describe curtailment practices and system operators' measures to minimise RES curtailment levels.

8) Which elements/articles of other existing planning obligations in the field of energy, including on security of supply, infrastructure and market integration do you consider indispensable and why? (up to 1000 characters)

Current plans in the field of security of supply and market integration should be streamlined.

Plans should:

- be based on a single EU system adequacy methodology, considering possible flexibility contribution from RES, storage and DSM;
- be based on harmonised policy scenarios and safety standards;
- show how the system gets ready to accommodate around 50% RES-E at EU level by 2030;
- show how market rules and products are adjusted so as to create a level-playing field among all energy technologies;
- show improvements in price formation mechanisms, considering increasing amounts of low marginal cost electricity and the need to more properly value system flexibility;
- consider the synergies among power, heating & cooling and transport sectors;
- be consulted with the neighbours.

As regards the competitiveness aspect, it is important that plans are based on uniform system cost calculation methods. Such methods should not only consider direct subsidies to all technologies but also potential and actual environmental and health costs stemming from the use of all technologies, including nuclear and coal.

9) Can you provide qualitative or quantitative evidence on the administrative burden on Member States and other stakeholders resulting from planning obligations at EU level? (up to 1000 characters; a possibility to upload further evidence is provided at the end of the questionnaire)

Future obligations

10) What level of importance do you attach to future planning obligations for Member States in the following key elements of the Energy Union Strategy?

	Very important	Important	Less important	Not important	No opinion
Security of supply	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Internal Energy Market	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Energy infrastructure	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Energy efficiency	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Renewable energy	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
GHG emissions reduction (decarbonisation)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Research, Innovation and competitiveness	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

C. Evaluation of reporting obligations


























Existing obligations

In the energy and climate field there are a number reporting obligations for the Member States and for the Commission. These have been developed to cover specific elements of the Energy Union, with less focus on integrated planning and reporting. Both the Member States and the Commission have to abide to reporting obligations. Usually, the information collected through Member States' reports is used by the Commission to assess trends in the climate and energy sectors, assess progress towards certain policy objectives, to monitor implementation and to propose policy and legislative reforms. Importantly, there are several different types of reporting obligations. The following distinctions are useful for the purpose of evaluating them:

- Reporting obligations can be regular or irregular. The former are fulfilled periodically; the latter usually once or after a specific request.
- The content of the reporting obligations may be specified in EU legislation, but the level of detail varies from one sector to another.
- Templates used to respond to reporting obligations are sometimes compulsory. In other cases, they have a voluntary nature.
- Reporting obligations are set up according to the information needs of each area of the energy field linked to the specific requirement of the objective of the initiative. Only in some cases they are coordinated with reporting obligations in other areas.

11) How would you rate the following aspects of reporting obligations in EU legislation?

	Very important	Important	Less important	Not important	No opinion
Coherence of reporting formats among all EU Member States	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Possibility to monitor the performance and trends (and put in place corrective measures if the results are lagging behind)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Effective and efficient implementation of EU legislation in the energy and climate field					
Assess progress to targets at Member State level and enable aggregation of data at EU level					
Better comparability of data from different Member States enabling an informed evaluation					
Increased certainty for investors across all EU Member States stimulating economic growth as well as research, innovation and competitiveness of the EU					
EU as a whole and Member States themselves are better informed on the actual performance and it provides ground for further action					

If other, please explain: (up to 1000 characters)

To ensure the achievement of our energy and climate policy objectives, it is important that MS reports are comparable and exhaustive. Reports should be based on templates provided by the Commission. Legislation which reports derive from should contain quantifiable measures: this way the Commission will be able to assess from the reports the extent to which legislation has been complied with. Furthermore, legislation should clearly define the remit of Commission enforcement competences and the Commission should fully use its enforcement power. In addition, when reporting on Member States' reports, the Commission should exhaustively and transparently describe identified issues and planned solutions, even when this implies touching upon politically sensitive matters. Finally, Eurostat data should be produced more independently from MS statistics and should be made available more quickly than today to allow for proper and prompt follow-up by the Commission.

12) Are you aware of overlaps or inconsistencies among the existing reporting obligations in the same or different areas of the energy acquis? Please provide examples. (up to 1000 characters)

Some MSs report installed capacities in AC, some others in DC. We believe installed capacities should always be reported in AC because:

- 1) the use of DC may lead to inconsistencies, as it requires the application of technology conversion factors, which are not harmonised across Europe;
- 2) AC considers losses while DC does not.

13) a) Which of the current reporting obligations could in your opinion be streamlined[*] into one integrated report and why? (up to 1500 characters)

Integrated plans would be appropriate for projections and for measures within the Energy Union dimensions WITHOUT targets.

By minimising the number of times projections are made, Commission and MSs would limit mistakes and inconsistencies. The integration of several projections would also make interactions and synergies among the various Energy Union dimensions more apparent. For the sake of transparency and coherence, dynamics in the nuclear sector, which today are described in the PINC reports, should also be included in these plans.

Measures within Energy Union dimensions WITH targets need to be planned and reported on in a very detailed manner. Specific information in areas with targets is indispensable to enable an informed evaluation of the effectiveness and efficiency of policy implementation and to allow the identification of appropriate corrective measures, thus ensuring targets achievements.

Measures in Energy Union dimensions WITH targets should be planned and reported on in separate streams, as high-level, political integrated plans would not be appropriate carriers of technical and precise information. Moreover, if integrated plans were to carry both general and detailed information, they would become very long and illegible and their compilation would require heavy administrative efforts.

b) Are there reporting obligations that should be kept separate from the integrated report? (up to 1500 characters)

As explained in reply to 13) a) separate planning and reporting streams should continue to exist for measures underpinning the achievement of climate and energy targets. Indeed, these measures need to be illustrated in a very detailed manner and separate documents better serve this purpose than integrated plans.

As the “Mid-term Evaluation of the RED” study points out, in spite of today’s efficient and effective system of NREAPs and biennial reports, information on national measures stemming from the RED is incomplete. This calls for the strengthening rather than the lightening of today’s planning and reporting system in the RES sector in the next decade.

This being said, planning and reporting streams in areas with targets may be streamlined to a certain extent. For instance, measures improving the energy performance of buildings, hence contributing to GHG emissions limitations and to the RES and EE targets achievement, could be planned and reported on in a more consistent and less dispersed manner than today.

c) Are there reporting obligations that could be repealed? (up to 1500 characters)

[*] By streamlining we understand the possibility to integrate planning and reporting obligations resulting from different sectorial legislation by reducing possible duplication or gaps in the reporting and planning obligations, thereby ensuring transparency, coherence, relevance, efficiency and effectiveness of the reporting and planning. Furthermore planning and reporting cycles should be harmonised to the extent possible.

14) Which elements/articles of the current reporting obligations in the field of renewable energy do you consider indispensable and why? Please, if relevant, refer to specific articles of the Renewable Energy Directive. (up to 1000 characters)

Existing RED p&r obligations are proportionate and justified.
However, in line with the findings of the “Mid-term Evaluation of the RED” study, we recommend to:

- 1) Make future RED provisions more “measurable”
- 2) Improve completeness of info included in plans and reports
- 3) Strengthen Commission monitoring and enforcement power
- 4) Improve transparency over Commission use of its enforcement power

Indispensable elements of future plans and reports are:

- RES shares, per sectors and technologies;
- RES trajectories;
- Cooperation mechanisms;
- permitting and grid connection procedures;
- RES in buildings;
- support frameworks, including for prosumers;
- priority access and dispatch;
- professional certification and public awareness.

In the absence of national targets, the Commission should produce benchmarks to ensure comparability between and transparency over MS efforts. Binding templates should be used to ensure comparability. Corrective mechanisms ensuring target achievement should be defined at early stage. RES p&r obligations should be adopted before legislation on the Energy Union integrated plans and reports is adopted.

15) Which elements/articles of the current reporting obligations in the field of energy efficiency do you consider indispensable and why? Please, if relevant, refer to specific articles of the Energy Efficiency Directive, the Energy Performance of Buildings Directive and the legislation on products. (up to 1000 characters)

All current planning and reporting obligations should be retained and strengthened. The renovation plans as described in the Energy Efficiency Directive should be maintained but complemented by medium and long-term (2030 and 2050) renovation targets.

The Member States should report how they implement the cost-optimal methodology under the EPBD, but should be more comprehensive in the way they encourage renewables in the building sector. Especially the smartening of the building stock (uptake of enablers such as demand response, storage and on-site renewables) should be better reported alongside the energy efficiency gains. The reporting obligations in the RES Directive should also be maintained, namely the implementation of Article 13.4.

16) Which elements/articles of the current reporting in the field of low-carbon development strategies do you consider indispensable and why? (up to 1000 characters)

Reports on low-carbon development strategies should exhaustively describe:

- 1) measures taken to achieve the GHG national targets
- 2) the spending of ETS funds
- 3) the progress made on the retirement of coal power plants
- 4) the progress made on the phasing out of fossil fuel subsidies.

17) Which elements/articles of the current reporting obligations in the field of infrastructure development (like for example TEN-E) do you consider indispensable and why? (up to 1000 characters)

Reports on infrastructure development should exhaustively explain progress made towards the achievement of the 15% interconnection target. In line with the 2030 EU-wide binding target for RES they should illustrate how grids are preparing to accommodate around 50% RES electricity, mainly solar and wind power. They should comprehensively describe curtailment practices and prove how RES curtailment is being minimised. They should not only focus on transmission grid infrastructure but also on distribution networks, as they bulk of future capacities will be connected to low- and medium-voltage levels.

18) Which other reporting obligations in the field of energy, including on security of supply infrastructure and market integration, do you consider indispensable and why? (up to 1000 characters)

Reports should:

- be based on a single EU system adequacy methodology, considering possible flexibility contribution from RES, storage and DSM;
- be based on harmonised policy scenarios;
- show how the system gets ready to accommodate around 50% RES-E at EU level by 2030;
- show how market rules and products are adjusted so as to create a level-playing field among all energy technologies;
- show improvements in price formation mechanisms, considering increasing amounts of low marginal cost electricity and the need to more properly value system flexibility;
- consider the synergies among power, heating & cooling and transport sectors;
- be consulted with the neighbours.

As regards the competitiveness aspect, it is important that plans are based on uniform system cost calculation methods. Such methods should not only consider direct subsidies to all technologies but also potential and actual environmental and health costs stemming from the use of all technologies, including nuclear and coal.

19) Which elements of the current reporting obligations in the field of energy research and innovation do you consider indispensable (investments in R&I, R&I funding programmes and projects and direct funding to institutions) and which information is publicly available or reported to other organisations? How can this reporting be made more consistent between Member States and more updated so that it can support more transnational cooperation in this field? (up to 1000 characters)

It would be important to strengthen the reporting on the level of investment by the public and private sector in different categories of energy technologies and on the coordinated EU and Member States research efforts.

20) Can you provide qualitative or quantitative evidence on the administrative burden imposed by existing reporting obligations on both Member States and other stakeholders? (up to 1000 characters, a possibility to upload further evidence is provided at the end of the questionnaire)

Future obligations

21) Do you consider future reporting obligations for Member States in the following key elements of the Energy Union Strategy to be?

	Very important	Important	Less important	Not important	No opinion
Security of supply	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Internal Energy Market	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Energy infrastructure	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Energy efficiency	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Renewable energy	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
GHG emissions reduction (decarbonisation)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Research, Innovation and competitiveness	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

D. Options for streamlining planning and reporting obligations

This part of the consultation seeks stakeholders' views on the options for the design of the planning and reporting obligations in the new governance system.













22) Do you agree that a comprehensive new legislative act covering both planning and reporting obligations of policy areas related to the Energy Union including the 2030 Energy and Climate framework would ensure consistency and reduce unnecessary administrative burden?

- ☐ YES
- ☒ NO
- ☐ No Opinion

23) Do you think that non-legislative approaches (e.g. guidance to Member States) can assure effective and efficient streamlining of planning and reporting obligations and would provide the necessary certainty for investors?

- ☐ YES
- ☒ NO
- ☐ No Opinion

24) Concerning options to streamline planning and reporting obligations in the framework of the governance of the Energy Union, how would "Non-binding guidance for both planning and reporting obligations covering all Energy Union dimensions" influence the following categories?





	Considerable Improvement	Improvement	No Change	Deterioration	Significant deterioration	No Opinion
Coherence of national plans and reporting formats among all EU Member States						
Effective and efficient implementation of EU legislation in the energy and climate field						



Achievement of the EU energy and climate objectives						
Possibility to monitor the performance and trends (and put in place corrective measures if the results are lagging behind)						
Increased certainty for investors across all EU Member States stimulating economic growth as well as research, innovation and competitiveness of the EU						

<p>Better implementation of international commitments by the EU as a whole and by Member States (e.g. concerning the reduction of greenhouse gas emissions)</p>						
<p>The Commission is better enabled to provide substantial and useful advice and ensure uniform application of EU legislation</p>						

25) Concerning options to streamline planning and reporting obligations in the framework of the governance of the Energy Union, how would "Regulating planning and reporting obligations in sectorial legislation as currently the case" influence the following categories?












	Considerable Improvement	Improvement	No Change	Deterioration	Significant deterioration	No Opinion
Coherence of national plans and reporting formats among all EU Member States						
Effective and efficient implementation of EU legislation in the energy and climate field						
Achievement of the EU energy and climate objectives						




Possibility to monitor the performance and trends (and put in place corrective measures if the results are lagging behind)						
Increased certainty for investors across all EU Member States stimulating economic growth as well as research, innovation and competitiveness of the EU						

<p>Better implementation of international commitments by the EU as a whole and by Member States (e.g. concerning the reduction of greenhouse gas emissions)</p>						
<p>The Commission is better enabled to provide substantial and useful advice and ensure uniform application of EU legislation</p>						

26) Concerning options to streamline planning and reporting obligations in the framework of the governance of the Energy Union, how would "Regulating both planning and reporting obligations by a new comprehensive legislative act covering all Energy Union dimensions" influence the following categories?

	Considerable Improvement	Improvement	No Change	Deterioration	Significant deterioration	No Opinion
Coherence of national plans and reporting formats among all EU Member States						
Effective and efficient implementation of EU legislation in the energy and climate field						

Achievement of the EU energy and climate objectives						
Possibility to monitor the performance and trends (and put in place corrective measures if the results are lagging behind)						
Increased certainty for investors across all EU Member States stimulating economic growth as well as research, innovation and competitiveness of the EU						

<p>Better implementation of international commitments by the EU as a whole and by Member States (e.g. concerning the reduction of greenhouse gas emissions)</p>						
<p>The Commission is better enabled to provide substantial and useful advice and ensure uniform application of EU legislation</p>						

27) In your view, what should be the nature of the initiative to best streamline the planning and reporting obligations in the framework of the governance of the Energy Union?

- ☐ Non-binding guidance for both planning and reporting obligations covering all Energy Union dimensions
- ☒ Regulating planning and reporting obligations in sectorial legislation as currently the case
- ☒ Regulating both planning and reporting obligations by a new comprehensive legislative act covering all Energy Union dimensions

If other, please elaborate: (up to 1000 characters)

The initiative must be based on legislation. Legislation is necessary to ensure the achievement of policy and climate objectives, as it guarantees MS' accountability and Commission enforcement power. Integrated plans and reports should not completely replace today's separate p&r streams. We see integrated plans as strategic, high-level political documents focusing on (streamlined) projections and on measures in the areas that are not covered by targets. Measures in areas with targets must be described separately in detailed, technical documents. Comprehensive information on these measures is necessary to ensure policy efficiency and effectiveness. However, there is room for streamlining today's sectorial p&r obligations, e.g. in the building area. Sectorial legislation should define p&r obligations first. Only then should the horizontal legislation defining integrated plans and reports be adopted. To ensure comparability and consistency, all plans and reports should be based on single binding templates.

28) Please elaborate on the reasons justifying your choice in the previous question: (up to 1000 characters)

The main risk associated with an integrated Energy Union p&r stream is the loss of very important information, with related deficiency of transparency, accountability, enforceability and certainty. While a light-touch approach can be appropriate for internal market and R&I areas, a robust governance is needed to ensure the achievement of targets. As regards RES, the “Mid-term Evaluation of the RED” points out that info on the RED implementation is incomplete, in spite of the solidity of the present RES governance. Such lack of info hampers the identification of gaps and inefficiencies that could be addressed by an improved EU regulatory framework. This calls for the strengthening of p&r obligations in the RES area.

E. Options for the governance system of the Energy Union and its process

E.1 Scope and nature of the integrated national climate and energy plans

National plans should take a holistic approach and address the five dimensions of the Energy Union in an integrated way recognising the interactions between different dimensions. The nation plans should cover the period from 2021 to 2030 and build upon what each Member State should deliver in relation to their policies for 2020 and also include a perspective until 2050. These national plans should provide long term predictability and certainty for investment and ensure greater cooperation and coherence among Member States' approaches on climate and energy policies.

29) Notwithstanding the fact that all five dimensions will be part of the National Energy and Climate plans, which elements of the Energy Union Strategy should be given prominence?

	Very important	Important	Less important	Not important	No opinion
Security of supply	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Internal Energy Market	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Energy infrastructure	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Energy efficiency	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Renewable energy	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
GHG emissions reduction (decarbonisation)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Research, Innovation and competitiveness	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

30) a) Building further on your replies to the sections devoted to the existing planning and reporting obligations (questions 1-21), which of the areas/articles subject to current planning obligations should be included in the integrated National Energy and Climate Plans? Please explain. (up to 1500 characters)

Integrated Energy Union plans and reports would be appropriate for areas without targets, e.g. research, innovation, competitiveness and internal market. These documents could also streamline all the projections that today are made several times as part of planning and reporting obligations stemming from sectorial legislation.

b) Building further on your replies to the sections devoted to the existing planning and reporting obligations (questions 1-21), which of the areas/articles subject to current reporting obligations should also be included in the integrated National Energy and Climate Plans? Please explain. (up to 1500 characters)

Integrated Energy Union plans and reports would be appropriate for areas without targets, e.g. research, innovation, competitiveness and internal market. These documents could also streamline all the projections that today are made several times as part of planning and reporting obligations stemming from sectorial legislation.

c) Are there current planning obligations that should continue to be treated separately? (up to 1500 characters)

Separate planning and reporting obligations should be kept for areas with targets.

31) What political process would be necessary to ensure the stability of the National Energy and Climate Plans (e.g. approval by national governments, cross-party approval, approval by national parliaments, or national legislative acts)? (up to 1000 characters)

There would probably not be a single political process for all countries, as national political systems are different. However, it would be important to organise transparent and effective stakeholder consultations prior to the adoption of the plans in all countries. The plans should reflect the opinion expressed by stakeholders and have a legally-binding character at national level.

32) What, in your opinion, would be the main factors that could justify an update of the National Energy and Climate Plans in the period from 2021 to 2030 (e.g. energy market developments, economic changes, evolving EU legislation, or collective progress made towards the Energy Union objectives)? (up to 1000 characters)

E.2 Role of different institutions in the governance process

33) How relevant would you rate the role of different institutions in the development of integrated National Energy and Climate Plans?

	Very relevant	Relevant	Less relevant	Not relevant	No opinion
European Commission	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
European Parliament	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
European Council	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Energy Council	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Environment Council	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
National administration	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
National parliaments	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
National stakeholders	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Neighbouring or other group of Member States	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Regional fora	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

34) How relevant would you rate the role of different institutions in the monitoring of the implementation of integrated National Energy and Climate Plans

	Very relevant	Relevant	Less relevant	Not relevant	No opinion
European Commission	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
European Parliament	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
European Council	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Energy Council	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Environment Council	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
National administration	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
National parliaments	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
National stakeholders	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Neighbouring or other group of Member States	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Regional fora	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

35) With respect to the National Energy and Climate Plans, what should be the role of the European Commission in order to ensure the achievement of the Energy Union's objectives?

	Very relevant	Relevant	Less relevant	Not relevant	No opinion
Support to Member States in developing national plans, notably by providing templates and technical support and disseminating best practice	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Review national plans and analyse Member States' contributions	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Issue policy recommendations, notably in its annual State of the Energy Union	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Approve national plans	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Propose measures on EU level in view of delivering on the objectives of the Energy Union	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

E.3 Regional cooperation to establish, and peer review before finalisation of, integrated climate and energy plans

36) In accordance with the conclusions of October 2014 and March 2015 European Councils, the new governance system should facilitate the coordination of national energy policies and foster regional cooperation. How important would you rate regional cooperation in the course of integrated climate and energy plans?

	Very important	Important	Less important	Not important	No opinion
As part of their national integrated plans Member States should jointly develop regional objectives, standards and common coherent strategies on the relevant dimensions of the Energy Union.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The national plans should describe how they reflect regional integration and cooperation on the Energy Union domains.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Member States should consult relevant other Member States on national plans before their submission.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The plans should provide clear account of these consultations and how they are incorporated in the plans.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The Commission should guide the process, and develop appropriate fora for consultations of draft plans and regional cooperation where required.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

37) Concerning consultations and mutual reviews of the integrated National Energy and Climate Plans (meaning that plans or progress reports of one Member State being reviewed by other Member States), how important would you rate the following options?

	Very important	Important	Less important	Not important	No opinion
Only consultations should take place in the preparation of the plans leading to the draft plans	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Mutual reviews should be done on draft plans	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Mutual reviews should be also used for progress reports assessing the implementation of plans	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Mutual reviews should be of voluntary nature for Member States	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Mutual reviews should be mandatory for Member States	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
A dedicated system of mutual reviews should be established including the creation of adequate fora	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

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Thank you for your participation!

Contact

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