

# 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:

professional organisation

\*

**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]

Name:

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Organisation (*where applicable*):

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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 type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The Commission is better enabled to provide substantial and useful advice	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

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

In the absence of binding national targets, a high degree of coherence among the national plans put in place by the Member States is essential to ensure achievability of the renewable targets. Transparency along the process and predictability in the final result are no doubt the strongest tools to boost investors' confidence in the renewable energy sector and enhance stability in the long run for this industry. Establishing clear and consistent provisions as well as ensuring a high level of coordination among the 28 Member States are essential preconditions for the renewable industry to deploy the maximum of its potential, allowing European countries to meet 2030 renewable energy targets and be on track on the long-term 2050 greenhouse gas reduction target.

To provide confidence to invest on renewables in the post-2020 period, the new governance framework should be agreed upon well ahead of 2020. For the renewables-related elements, this should be done as part of the post-2020 Renewable Energy Directive planned for 2016-2017, enabling Member States to develop stable policy frameworks and to implement their 2030 renewable energy contributions.

Consistency can be reached by strengthening comparability among the Member States. In view of that, the European Commission needs to define 2030 indicative renewable energy benchmarks per Member State. Following the recent COP21 agreement, the share should add to 35%. This will provide an early indication of the required contribution per country and will enable MS to move forward to the actual goal: an efficient, renewable-based economy as traced in the EC Communication 'Roadmap for moving to a competitive low carbon economy in 2050'.

**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)**

High level of consistency should be kept also with regards to regional initiatives whose purposes risk to hinder financial efforts put in place by other Member States and neutralise the progresses achieved at European level. One of these examples is the Supplemental Balancing Reserve scheme in the U.K.

Paying coal fired power stations to stay alive, seriously threatens the goal of departing from coal energy. There should be some mechanisms, which would naturally allow for Balancing Reserves, but not for coal to be included. Incentivising gas fired power stations and stable renewables would be the preferred option in this case.

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

Anaerobic digestion (AD) and gasification industries produce biogas from biomass able to replace part of the imported natural gas from production of electricity, transport fuel, heating and cooling. Sustainable biomethane production from AD and gasification of renewable organic material could realistically provide at least 20% of the total demand in gaseous transport fuel in Europe by 2025. EU-wide sustainability criteria are expected to be extended and potentially cover most, if not all, the sectors involving application of biogas and biomethane.

Given the lack of a specific transport target after 2020, the sustainability criteria should be kept within the RED Directive in order to allow effective consistency and a level playing field among all sectors and technologies competing for this resource. The related planning (and reporting) under RED should be additionally streamlined taking into account the overlapping with the Effort Sharing Decision.

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

The planning provisions from the current directives need to be safeguarded. EBA's preferred option is to keep separate, detailed sub-plans (including on the pathways and targets) as part of the implementation of the specific directives, with separate, overall national climate and energy plans mostly aiming at ensuring coherence and synergies between the different planning obligations and targets, and including the general direction that each MS is willing to take.

If instead it is decided to have the entire climate and energy planning combined into a single document, then all the various elements thereof should best get decided during the discussions on the specific pieces of legislation. In this case, one would need to carefully ensure coherence between what is decided in the framework of the revision of the specific directives, on the one hand, and the proposed planning and reporting legislative instrument on the other hand, both of which will probably have different timings.

EBA is of the opinion that integrating all climate and energy planning obligations into one single plan is likely to reduce the level of clarity and detail currently provided by Member States. It would also increase the risk of third parties not understanding the nature and scale of the plan, hence reducing transparency, legitimacy and investor confidence. To avoid this, EBA suggests revising the current governance arrangements as separate instruments with separate planning and reporting obligations.

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

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[\*] 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)**

The current RED planning framework requires the inclusion of information regarding the energy production sorted by final output, making it possible to track each single Member States' progress in the overall EU trajectory. This is essential and should be kept as it is the further specification of the carbon emission reduction generated by each specific technology. The same degree of detail should be kept at the reporting stage.

Strategic and binding planning on how to achieve the non-ETS target should be part of the streamlining process among RED, EED and ESD. The projections and the policies&measures (PAMs) implemented by the European countries to reduce greenhouse gas emissions in the non-ETS sectors (ESD) only report the expected reductions in greenhouse gas emissions resulting from the implementation of the PAMs, as estimated by countries. If from the one hand this mechanism allows flexibility for the measures put in place by each MSs, on the other hand it hinders the business predictability for the industries operating in those sectors. A planning mechanism with a binding nature should therefore be included.

**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)**

Energy efficiency and renewable energy production are closely interlinked and both are needed to mitigate climate change; this is particularly important in the buildings sector.

An indispensable element to decarbonize the buildings sector is the integration of district heating networks that distribute renewable heat in densely populated areas. Modern district heating is energy efficient and cost-effective for consumers to switch to renewables; this is particularly the case when the network is fed by cogeneration plants running on biogas.

Article 13.4 of RED requires MSs to increase renewables in the building sector, particular via district heating. This obligation is essential to promote the deployment of district heating and should be kept. Moreover, the article should have a clear reference to article 9 on Nearly Zero-Energy Buildings (NZEB) of Directive 2010/31/EU.

The duty on MSs to draw national plans for NZEBs is a cornerstone of Europe's efforts to decarbonize its buildings and therefore it should be kept beyond 2020. The Commission should still be granted the possibility to evaluate national plans. A clause should be introduced to ensure that the national plans related to NZEB follow technological advancements in the building sector - where the level of ambition can only be revised upward.

**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)**

To unlock the true potential of low carbon industry as the anaerobic digestion and gasification, which supplies renewable and sustainable biogas and biomethane across Europe, Member States should be able to value efforts and investments in those low carbon technologies with the proper fuel comparator (EU fossil fuel mix in power and heat, diesel / petrol mix in transport), reporting the real GHG emission saving.

For this reason, the typical and default GHG emissions values listed in the Annex IV of the Fuel Quality Directive and the Annex V of the Renewable Energy Directive for biogas issued from municipal organic waste, maize, dry and wet manure should be compared to the fossil comparators named below or at least to unconventional gas if natural gas remains the comparator.

**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)**

Given the overlap between the five Energy Union dimensions, a regional approach should prioritise issues of common relevance, namely power system management, spatial planning and infrastructures development.

Besides the consistent application of the criteria/cost-benefit analysis methodology and evaluate their cross-border relevance as stated in ANNEX III point 2, (7) of the Regulation (EU) No 347/2013 on guidelines for trans-European energy infrastructure, EBA considered essential the development of a strategic planning for the achievement of the interconnection target should be developed also at Member State level. A detailed strategy on modalities and timing will support the uptake of renewable energy technologies and fulfilment of a fully integrated energy market.

Moreover, in parallel to the definition of national plans and renewable energy contributions, Member States should engage in a dialogue with neighbour countries to achieve cost-effective renewable energy deployment and public acceptance. It is of utmost importance that regional cooperation should build on a coordinated regional policy planning, joint projects between Member States as well as joint research activities and co-funding for innovative technologies (for example second-wave renewable energy technologies).

**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)**

The existing planning for gas supply crises and EU monitoring of crude oil and petrol stocks aims only at improving readiness for acute and sudden supply disruptions. A long-term strategy is missing. In the future, however, planned legislation on security of electricity supply will have to reflect the rising importance of variable renewable electricity. This includes highlighting the importance to increase the capacity of flexible renewable electricity generation, such as biogas cogeneration plants which can be switched on in seconds to cover sudden drops in supply or spikes in demand, thereby ensuring security of supply.

Also, the proposed resilience and diversification package for gas should include RES as a core element. In this case, any potential new planning and reporting requirement under this package should be consistent with the 2030 targets and with the projections used for monitoring the implementation of the RES and energy efficiency targets. The new approach should also reflect all planned measures without duplicating existing planning processes. Any duplication with existing energy demand and supply projections as described above should be avoided.

Looking forward, this planning should reflect the rising importance of renewables as domestic and secure supply sources.

**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)**

The April 2015 mid-term evaluation of the Renewable Energy Directive performed in the context of the REFIT programme concluded that the overall administrative burden and costs of planning and reporting obligations are reasonable, compared to the benefits.

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

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

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

From an industry perspective, EBA sees coherence, transparency and predictability as essential principles for the long term running and development of RES in the European climate and energy policies. In view of guaranteeing consistency in the data reported from the 28 Member States, the European Commission should provide a uniform and binding templates for national climate and energy plans. This will ensure comparability among Member States' progress towards the target up to 35% and allow for proper monitoring through indicators.

These latter should be developed with a certain level of flexibility to follow the gap-avoider and/or back-filler approach, steering mechanisms that from the one side prevent Members States from missing their trajectories and on the other side already foresee back-up measures (i.e. compensation provided by other Member States).

The template should be mandatory, build upon existing renewable energy national plans and preserve reporting on trajectories and policy developments per sector, type of renewable energy sources and enabling technologies (for instance CHP, district heating and cooling, and heat pumps). It should be grounded in horizontal legislation and duly referenced in the revised Renewable Energy Directive.

The information collected should be made publicly available.

For the above mentioned principles to be effectively implemented, the European Commission should be given a coordination role in order to provide the governance regime with an effective link among Member States' efforts towards the final target.

**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)**

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

Streamlined planning and reporting requirements could provide an opportunity to highlight the synergies between the three climate and energy targets and their policies, such as the benefits of RES generation and energy savings as key measures to reduce GHG emissions.

This is especially important for the biogas and gasification sectors which contribute both to the reduction of GHG emissions from organic effluents (mostly as methane) as well as the production of domestic renewable energy to substitute imported fossil fuels.

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

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

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[\*] 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)**

See question 4

**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)**

See question 5

**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)**

See question 6

**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)**

See question 7

**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)**

See question 8

**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)**

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**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)**

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*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 checked="" type="radio"/>	<input 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 type="radio"/>	<input checked="" 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	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Effective and efficient implementation of EU legislation in the energy and climate field	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

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

<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	<input type="radio"/>	<input type="radio"/>	<input checked="" 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 type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Achievement of the EU energy and climate objectives	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

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

<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>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<p>The Commission is better enabled to provide substantial and useful advice and ensure uniform application of EU legislation</p>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

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	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Effective and efficient implementation of EU legislation in the energy and climate field	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

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

<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>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
<p>The Commission is better enabled to provide substantial and useful advice and ensure uniform application of EU legislation</p>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

**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)

An integrated and comprehensive legislative act covering all Energy Union dimensions would streamline planning and reporting obligations, bringing clarity and consistency in the process, reducing the administrative burden related to fragmented obligations. However, the contribution generated by each single technology towards the collective target in the different sectors (for instance CHP, district heating and cooling, heat pumps or transport) should be clearly recognisable and comparable.

The existing instruments (RED, EED and ESD) contain the building blocks of robust governance of the 2020 targets. This means that Europe must maintain and improve the already existing building blocks enshrined in these instruments. Revising them, as opposed to drafting a new instrument from scratch, would put pressure on the legislators to maintain maximum of ambition and would reduce the risk of losing valuable information.

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

The improvements in limiting administrative burdens should definitely not undermine availability of timely and detailed data. In other words, a reduction of quantitative reports should not undermine the quality of reporting.

## **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 national 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 checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Internal Energy Market	<input checked="" type="radio"/>	<input 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 type="radio"/>	<input checked="" 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)**

All the items mentioned in the Annex VI of the RED should be integrated in the NECPs. The minimum requirements template should have a binding nature.

**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)**

With reference to Annex VI of the RED, the points 4 encouraged MSs to present an assessment of the contribution in the energy production and energy saving expected by different technologies. This requirement should be extended also to the reporting stage, in order to assess their effectiveness, guarantee a mid-term predictability for the investments and secure achievability of targets.

In addition, the EC should broker cooperation mechanisms as they can achieve a cost-effective fulfilment of the EU-wide target. If they are insufficient to fill the gap, the EC should use existing and new EU funds as trigger mechanisms to incentivise the collective RES engagement.

Financial support from existing funds (e.g. Modernisation Fund) should be only granted on the condition that Member States comply with their RES pledges and thus give their fair share in achieving the common target.

An alternative could be the creation of new funds, financed by those Member States whose contribution falls below the indicative benchmarks. Taking into consideration the different maturity levels, specific barriers, and risk profiles of various renewable energy technologies, part of the EU funding could be distributed through EU-wide tender systems granting a long term premium. In addition, other smart financial mechanisms could be developed for small-scale renewable technologies to tap into their future potential.

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

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**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)**

Given the need to have a legal binding act national government and Parliaments are the best placed to approve and guarantee stability of the NECPs.

**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)**

Meeting the binding EU-wide target up to 35% renewables by 2030 will be a critical contribution to this end. In the absence of post-2020 national renewable binding targets broken down per Member State, a robust and transparent governance system with a strong legal basis will be needed to provide stable regulatory framework and attract investments in renewables by 2030.

The main driver for an update of the National Energy and Climate Plans is the evolution of the policies in these fields and the urgent need to find new instruments and modalities to value the efforts made by the industry and support the Member States to achieve the agreed targets.

As highlighted in countless debates in international fora, the relevance of climate and energy policies is growing fast, in parallel with the resolve to reduce to a minimum the dangerous and possibly catastrophic changes that climate change is likely to have on the environment. Europe has to make sure to have in place the best (legislative) instruments in order to cement its commitment and fulfil its responsibility.

In view of that, the plans should be regularly updated when appropriate, revising the ambition only upwards. Legal mechanisms should also be introduced to ensure the accountability of this progress and also opening the possibility of intervention by the Commission whenever MSs make counter-productive changes to their regulatory framework, such as retroactive changes to support mechanism.

If Member States deviate from their trajectories and a gap between the aggregated national commitments and the overall 2030 target is identified, the European Commission must be able to propose corrective measures which, unheeded, would trigger infringement procedures.

***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 type="radio"/>	<input checked="" 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 type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Environment Council	<input type="radio"/>	<input type="radio"/>	<input checked="" 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 type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Neighbouring or other group of Member States	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Regional fora	<input type="radio"/>	<input type="radio"/>	<input checked="" 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 type="radio"/>	<input checked="" 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 type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Environment Council	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" 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 type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
National stakeholders	<input 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 type="radio"/>	<input type="radio"/>	<input checked="" 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 type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Approve national plans	<input type="radio"/>	<input checked="" 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 checked="" type="radio"/>	<input 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 checked="" type="radio"/>	<input 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 type="radio"/>	<input checked="" 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 type="radio"/>	<input checked="" 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 checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

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**Thank you for your participation!**

## **Contact**

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