

# 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]

Name:

Organisation (*where applicable*):

Address:

ID from the Interest Representative Register[\*] (*where applicable*):

Telephone:

Email:

[\*] 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.

\*

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

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

We appreciate the Commission's aim to reduce the unnecessary administrative by streamlining the planning and reporting obligations, and consider that both the administrative burden to the member states and for companies should be reduced. Removing inefficiencies enshrined in reporting obligations can help to reduce the administrative burden for stakeholders.

Many information and reporting requirements, which go back to EU requirements, lead to administrative burden for energy companies, particularly for small and medium enterprises (SMEs) with limited manpower. In addition, the reporting obligations should take into account that confidentiality of business data must be guaranteed.

**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)**

The development of the National Renewable Action Plans, Low Carbon Development Strategies, National Energy Efficiency Action Plans and Land Use and Land Use Planning requirements need to be streamlined to avoid gaps, duplications and inconsistencies.

The member states should be required to address in their national plans also the areas of policy where potential conflicts between different areas of policy arise. Examples of this include the EU Water framework Directive, RES and climate change. The potential of hydro power plants to attainment of the European renewables targets - as renewable technology and enabler of further deployment of variable RES - cannot be fully exploited due to the restrictions imposed by the Water Framework Directive.

The Commission and the Member States should be required to assess the interlinkages between the EU ETS and RES support and consider ways for how to address them. The impacts of RES support on the power market, Sos and competitiveness of electricity for end-consumers should also be evaluated, and the resulting distortions minimised.

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

The integration of variable RES to the power system and market is facilitated by development and integration of power markets, as well as development of smart grids, storage, demand response and robust contribution from firm and flexible generation. These aspects should thus be treated in an integrated manner.

In general, the planning regarding decarbonisation (RES, EU-ETS, energy efficiency, decarbonisation of the non-ETS sectors) should be integrated to avoid policy overlaps and inefficiencies, and provide a clearer picture of the overall savings efforts.

Especially, the Low Carbon development strategies (LCDS) under the Monitoring Mechanism regulation, the Corrective Action Plan under the Effort Sharing Decision and the Information on current and future LULUCF actions under the LULUCF decision should be streamlined into one integrated plan to ensure consistency, coherence and effectiveness of the planning obligations.

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

Security concerns may prevent inclusion of certain information in the integrated plan.

The National plan under the ETS Directive regarding investments in retrofitting and upgrading of infrastructure and clean technologies fulfils specific requirements of the ETS Directive. It is only required for some member states under very specific circumstances. However, if such a National Plan is required, the information included in the national plan should fully take into account the Low Carbon Development Strategy of the respective member state.

**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)**

Experience from the 2020 framework shows that different targets can interact in ways that reduce the framework's overall effectiveness. This must be avoided: the coherence of the three 2030 targets must be continuously analysed and ensured. The Commission impact assessment accompanying the 2030 proposals, for instance, clearly illustrates that aligned and coherent policies are crucial to maintain and strengthen the role of ETS.

**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)**

Article 4 of the EED requires the member states to report on the building efficiency strategy as part of the NEEAP (Art. 24 ( 2 ) every three years. Article 9 of the EPBD introduces national plans regarding the increase of the number of nearly zero energy buildings. These requirements fit well together and there are even some overlaps in the content. The relocation of the building efficiency strategy into the EPBD or an expansion of the requirements of Art. 9 of the EPBD could bring a simplification. Other individual reporting obligations under the EPBD could be integrated into this "Building Efficiency Report" (Art. 5(2), 13 (4)). In turn, the report according to Art. 10 (2) of the EPBD could be integrated into the NEEAP.

**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)**

**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)**

A more efficient operation of existing interconnections and an increase in interconnection capacity is needed in order to integrate the power markets, to facilitate the integration of renewables, and to enhance security of supply. Grid projects with a positive macro-economic cost-benefit analysis (CBA) should be executed, and those with a negative CBA should not be executed.

The PCIs are central for a successful development of the European transmission grid. The delays of the PCI projects should be addressed. Information and analysis of progress in the area of interconnections should be fully integrated in the governance process.

**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 national plans should include enablers to make the energy market investable again and facilitate a cost-efficient energy transition. These measures should contribute to improved market integration and could include infrastructure and end-users, cross-border cooperation, and innovation and R&D. Specific attention should be paid to fostering better functioning wholesale markets, including measures necessary to make renewables schemes more cost-efficient and exposed to market signals.

For market integration, Annex 1 of Regulation 714 (2009) is indispensable for governing the cross border trade of electricity and should be enforced more effective than today.

**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 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 type="radio"/>	<input checked="" 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 type="radio"/>	<input checked="" 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	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Assess progress to targets at Member State level and enable aggregation of data at EU level	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Better comparability of data from different Member States enabling an informed evaluation	<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"/>
EU as a whole and Member States themselves are better informed on the actual performance and it provides ground for further action	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

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

**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)**

Overlaps or inconsistencies with the documents of the European Semester addressing energy policy and regulation should be avoided.

In general double reporting obligations on the same information should be avoided.

- The PCI/CBA includes double reporting to the Commission and ENTSO-E, and should be reconsidered.
- The reporting obligations arising from the financial regulation should also be reconsidered.

Generally, we consider certain transaction reporting and disclosure obligations imposed on the non-financial counterparties to be excessive and costly. Wherever possible, the transaction data shall be obtained straight from the existing sources, i.e. from financial institutions involved in processing and not directly from the market participants. These regulated entities are better equipped to provide professional reporting and disclosure services. More information on our views: Eurelectric's response to DG FISMA "Call for evidence: EU regulatory framework for financial services".

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

The reporting obligations arising from the EMIR &REMIT regulations should be reviewed and streamlined (see question 12). From a technical perspective, we believe it is crucial to develop an industry standard format for regulatory reporting. Right now, reports to EMIR need to be sent in one language and reports to REMIT in another, which leads to unnecessary administrative burden.

The Kyoto and EU 2020 progress report under Article 21 of the Monitoring Mechanism Regulation and the Report on concluded transfers under Article 26 of the Effort Sharing Decision should be streamlined. The intended use of flexibility mechanisms under the ESD should be fully taken into account in the Kyoto and EU 2020 progress report.

reporting obligations arising from the EMIR &REMIT regulations should be reviewed and streamlined (see question 12). From a technical

All reporting falling under the National Plan should be combined into one report where feasible. Medium to long range (scenario-style) planning for Energy and Climate targets should be combined into the National Plan. Correspondingly, reporting requirements under these combined National Plans should also be combined:

Minimum Oil Stocks

Price Reports

Security of Elec. Supply

Notification of joint projects, joint support schemes and stat transfers

Co-generation statistics

GHG Inventories

Kyoto GHG reporting

ESD (Non-ETS) GHG reporting

LULUCF (land use and forestry) GHG reporting

Information on new passenger cars

Information on new vans

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

**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)**

**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)**

**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)**

**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)**

**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)**

Having the goal of energy market integration in mind, security of supply in the field of gas and electricity should not simply be viewed in a national context but should be coordinated also at a regional and European level even if the member states are primarily responsible for security of energy supply. Every country should be obliged to prepare a preparedness plans. Such plans must be based on the specific characteristics of the domestic power system as well as the interconnections.

Member States' risk preparedness plans should include system adequacy assessments. Regional assessments are becoming more important as the market becomes more integrated.

Member states should be obliged to plan for crisis situations and coordinate these plans with connected systems. Preparedness plans are of vital importance in order to handle threats and incidents in the power system in an efficient way, and reduce the negative effects.

Please see Eurelectric's response to the consultation on security of electricity (2015) for more details

**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)**

Provision of information on ongoing or completed research projects within the EU in a centralised manner should be considered. This would help to avoid some double research and allow finding partners. Universities and research institutions could be required to report the information. A platform such as the "European Investment Project Portal" (EIPP) could be used in this context.

**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)**

For example, current reporting obligations regarding EU ETS represent for CEZ utility, exclusively under Directive 2003/87/EC and Commission Regulation (EU) No 601/2012 represents roughly 70 man-days AND more than 200.000 EUR of related costs.

In general, over the past years, the pressure on non-financial counterparties in terms of the compliance has been intensified. Indeed, many new compliance requirements have been introduced not only in financial but also in non-financial world. Complexity and lack of clear guidance on the implementation have led to the increase of the resources, that non-financial counterparties need to spend in order to comply with these new compliance requirements in the EMIR and the MAD / MAR legislation.

***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 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"/>

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

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

## **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)**

Following the truly international climate agreement reached in Paris, meeting the EU's international goals should be a key goal of the Energy Union Governance. Two elements are key for cost efficient decarbonisation: a well-functioning electricity market and a robust EU ETS.

The national plans should include:

- measures to achieve the national GHG targets for the non-ETS sectors, including increase in RES through electrification;
- energy demand projections and EE programmes;
- low carbon projections (including RES ) and RES programmes;
- an assessment of how the measures influence SoS and fit with the Internal Energy Market, (cross-border effects, compatibility with the EU ETS, potential market distortions);
- complementary measures supporting the 2030 climate and energy targets, in particular development of the IEM
- an assessment of policy support costs related to RES, EE and climate change for customers the consequences of the costs and their allocation for customers and on decarbonisation (i.a. electrification);
- measures to combat carbon leakage;
- use of cooperation/ flexibility mechanisms.
- Measures to ensure SoS

The Member States and the Commission should guarantee consistency between the 2030 climate and energy targets, and take into account the interlinkages between the EU ETS and RES support.

Especially issues covered today in the RES Aps (Action Plans), Low Carbon Development Strategies and EE APs, the Corrective AP (Effort Sharing Decision) and the information on LULUCF actions (LULUCF decision) should be treated in an integrated manner.

**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)**

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

**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)**

Member states should decide on this country by country basis based on the subsidiarity principle.

Whenever possible, national energy and climate plans should be based on broad cross party support and should preferably include also long term visions. Retroactive changes to e.g. renewable support schemes that frustrate legitimate expectations should be avoided.

**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)**

The feedback resulting from the regional cooperation and from the assessment of the Commission should prompt the revision of the national plans during 2021-2030. Furthermore, national plans should be updated if there are major changes in national energy and climate policy. Moreover, Member States should be obliged to update their national plans at least once during 2021-2030. We are of the view that the Commission should play a stronger role than today in facilitating cooperation between member states and ensuring convergence between member states national energy policies.

### ***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 type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
European Parliament	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
European Council	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" 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 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 type="radio"/>	<input checked="" 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 type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
European Council	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Energy Council	<input type="radio"/>	<input checked="" type="radio"/>	<input 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 type="radio"/>	<input checked="" 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 type="radio"/>	<input checked="" 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 type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Approve national plans	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" 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 type="radio"/>	<input checked="" 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 checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Mutual reviews should be done on draft plans	<input type="radio"/>	<input type="radio"/>	<input checked="" 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 type="radio"/>	<input checked="" 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 type="radio"/>	<input type="radio"/>	<input checked="" 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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