

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.

*

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:

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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.

*

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

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

B. Evaluation of planning obligations

Existing obligations

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

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

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

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

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

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)

PWEA has no opinion.

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 proposal of the new market design assumes real regionalisation of the European power market. PWEA is a supporter of further market integration. We believe creation of regional markets, with Poland participating in the Baltic sea region market, will facilitate renewable energy deployment with benefit to consumers. Such efforts require stronger coordination between TSOs, energy regulators as well as regional adequacy assessments and joint renewable energy planning. In other words, renewable energy planning should be streamlined with energy planning as such, with special attention to the RES potential in the region and age of conventional production infrastructure that could be replaced by renewables in a planned- and harmonised manner.

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

PWEA has no opinion.

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

Energy investments, so needed in newer member states are long-lasting processes. Moreover, the new market design, with renewables at core, requires redefinition of power systems. This again, requires careful grid planning and strong cooperation between member states in the region. Therefore, PWEA supports better coordination in planning between countries and subsectors rather than revealing planning obligations.

[*] 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)

National plans should include elements of the current renewable energy directive. In the first place, they should provide transparent templates for energy planning, so that national contributions could easily be aggregated and data verified in a transparent way. Member States should define the renewable energy element of their plans building upon the 2020 national targets. Overall and sectoral renewable energy shares by 2030 as well as indicative trajectories should be maintained to provide investors with visibility over market growth. Indicative trajectories will allow the Commission to monitor progress towards the EU-wide target.

National plans should also outline measures to incentivise higher uptake of renewables including support mechanisms, planned reinforcements of transmission and distribution infrastructure and simplified administrative procedures.

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 allows for increasing energy security and competitiveness of economies. As such, it should be the underlying assumption for creating any energy policy. It should also be closely related to carbon intensity of economies. Renewable energy plays a growing role in the building sector and therefore these regulatory areas are increasingly interconnected. F.ex. promotion of flexible co- and polygeneration can also serve local balancing of variable renewables. Such a combination is not only increasing the quality of energy on the local level but is also facilitating deployment of variable renewables and decreasing the overall system cost of integration. Eastern and Northern Europe have the highest share of district heating so better technical coordination of wind power and district heating systems (supported by CHP with heat storage options) is a natural way to optimise the use of resources.

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)

Regarding Directive 2003/87/EC and Article 10c derogation thereof, this mechanism for lower income Member States has proved to be inadequate as strong sustainability and full transparency criteria are lacking. To effectively leverage private investments in a modernized power sector and contribute to the EU's 2030 climate & energy targets, the reporting requirements on the article 10c derogation should be strengthened.

The assessment of projects should be linked to the 2030 governance process and Member States' contribution to the delivery of the EU 2030 climate & energy targets. This implies that under the transitional free allocation, the investment plans in which projects are set out need to be linked to Member States' performance in decarbonizing their power sector and bringing forward adequate national energy plans. The Commission should be able to use the granting of a free allocation derogation as a means of keeping Member States on track to modernize their power systems.

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)

Member States should coordinate infrastructure development and take joint efforts to build grids for regional use. In such a way they could optimise the use of energy potential among neighbours and strengthen their energy security. Baltic Energy Market Interconnection Plan is a splendid example of a potential regional cooperation not only in the areas of joint infrastructure build-out but also joint regional (renewable) energy planning. Therefore, member states should report and coordinate planned investment in interconnections projects for a period of at least five years (Security of Electricity Supply Directive, Art. 7) and TSOs should submit to National Regulatory Authorities a 10-year network development plan (Electricity Directive, Art. 22). This is indispensable to provide long-term visibility on necessary transmission infrastructure needed to balance wind output over broader geographical areas. System operators should consider energy efficiency / demand side response / storage solutions that might supplement the need to upgrade or replace network reinforcement from a system perspective (Electricity Directive, Art. 25) If generation adequacy is analysed on a regional level, this should not come at the expense of increased and non-remunerated curtailment of wind power producers.

Future planning requirements should be made on the assumption of preparing grids to accommodate a share of min. 50% of renewables in electricity production by 2030. Member States should also plan the deployment of smart grids technologies alongside the necessary regulatory framework from National Regulatory Authorities.

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)

Baltic Energy Market Interconnection Plan can be a great regional initiative leading to the creation of the regional high-RES populated power market. Considering a joint grid infrastructure for offshore wind interconnection will definitely decrease the cost of Baltic Sea wind offshore developments and will increase security of energy supply.

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)

PWEA has no opinion.

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 checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Energy efficiency	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Renewable energy	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
GHG emissions reduction (decarbonisation)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Research, Innovation and competitiveness	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

C. Evaluation of reporting obligations


























Existing obligations

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

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

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

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

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

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

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)

Green heating in distributed sources may require further attention regarding calculation methodology. It is very difficult to estimate the actual green heat potential as well as efficiency improvements in households. As such, it provides an ambiguous picture regarding actual realisation of 2020 targets. PWEA believes a consistent methodology will clarify the potential disputes on contribution of the heating sector into the RES- and decarbonisation targets.

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

PWEA has no opinion.

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

PWEA has no opinion.

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

PWEA has no opinion.

[*] 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)

Member States reporting on national renewable energy shares, support schemes, simplified administrative procedures and transmission and distribution networks reinforcements as per Article 22 (1 a, b, c, e, f) should be maintained to provide a holistic overview of national policies, drive regional coordination and joint regional efforts. Such a rhythm shall also ensure transparency for investors. Biennial reporting will allow the European Commission to monitor collective progress towards the binding 2030 renewable energy target and will serve as an early-warning system giving way to corrective measures in case Member States deviate from their pledges. The European Commission's monitoring and reporting obligations as per Article 23 should be maintained. The Commission should be able to intervene in case of counter-productive measures and, as under the European Semester, should make official policy recommendations on national renewable energy policies. The Commission should report biannually to Member States and the European Parliament as part of a reliable governance process and ensure transparency over collective progress.

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)

PWEA has no opinion.

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)

PWEA has no opinion.

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)

Member States' reporting requirements in the post-2020 period should provide evidence of the progress made power markets regionalisation and fulfilment of the 15% interconnection target. Planning and reporting obligations could be strengthened to improve transparency of investments in distribution networks.

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)

National Regulatory Authorities (NRAs) should collect variable renewable electricity production curtailments to provide transparency and avoid non-compliant behaviour, including: (a) duration and spilled energy, (b) justification by the TSO/DSO. They should provide more clarity on trade flows: monthly national production, load flows, traded volumes, power certification. For electricity transmission networks to be used more efficiently and make more cross-zonal tradable capacities available to the market, reporting on the progress made by TSOs in implementing the state of the art capacity calculation method in a coordinated manner is needed. For balancing markets, evolution of prequalification and procurement rules and imbalance settlement features should be reported. The participation of RES generators in these markets should be included. NRAs should report developments related to regional adequacy assessments and the introduction of regional Capacity Remuneration Mechanisms, should they be indispensable to assure security of energy supply.

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)

Renewable energy is one of the most innovative European products. There is also a lot of public spending on R&D funding both on the EU- and national levels. However, there is a need to better coordination of various mechanisms, stronger promotion of industry - R&D sector cooperation as well as measures to facilitate stronger inclusion of CEE research institutes in European consortia. In this sense, the following elements are important to report on:

- Investments in R&I
- Structures/platforms consulted in drafting public R&I funding programmes (e.g. European technology platforms)
- R&D needs
- Participation of European R&D institutions and industry representatives per country
- Possible measures to support CEE in broader participation in European research.

In addition, a clear work-flow and timeline set-up between SET-Plan Steering Group and National initiatives should be defined.

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)

PWEA has no opinion.

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 checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Renewable energy	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
GHG emissions reduction (decarbonisation)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Research, Innovation and competitiveness	<input checked="" type="radio"/>	<input 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 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"/>






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

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

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




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

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

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

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

	Considerable Improvement	Improvement	No Change	Deterioration	Significant deterioration	No Opinion
Coherence of national plans and reporting formats among all EU Member States	<input type="radio"/>	<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"/>	<input type="radio"/>

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

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

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

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

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

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

The concept of energy union with renewable energy at the core of the power system requires joint efforts on many dimensions:

- bilateral, regional and European cooperation and coordination
- coordination between energy subsectors
- coordination in the area of infrastructure developments.

The concept is to bring value added ($1+1 = 3$) to all joint European efforts taken to decarbonise the European power sector so measures can reinforce mutually. In this light, it is better to take a holistic approach and structure reporting in such a way that the process covers all key phenomena observed and stimulated in the power markets.

It is, however, of utmost importance that such a holistic approach does not deteriorate transparency and quality of reporting on specific levels.

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

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

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

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

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

Articles 4 and Annex VI of Directive 2009/28/EC should be adapted to the EU-wide binding target.

As under Article 4, Member States should set 2030 renewable energy contributions in national plans. The uniform and binding template for national plans should include as a minimum:

- Concrete 2030 renewable contributions and trajectory stemming from 2050 energy and climate strategies to align Member States' policies with the EU's long-term decarbonisation objectives;
- Indicative trajectories and interim targets for electricity, heating and cooling, transport to ensure a linear progress towards the binding 2030 renewable energy target% renewable target to give an early indication of potential deviation;
- Technology-specific targets and trajectories where appropriate. For maturing technologies, such as offshore wind, the 2030 national commitments need to indicate specific deployment volumes planned to deliver cost reductions through scalability;
- National policy measures for the deployment of renewables including support mechanisms, infrastructure development and streamlining of administrative procedures;
- Indicative measures adopted by Member States in renewable energy-related areas (e.g. taxation) to ensure coherence among different policy streams.
- Measures to stimulate regional cooperation and joint regional initiatives (f.ex. joint support schemes).

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)

Articles 22 and 23 of Directive 2009/28/EC should be adapted to the EU-wide binding target.

As under Article 22, Member States should continue to report bi-annually to the European Commission. The reporting obligations of the European Commission, namely presenting an EU-wide progress report to the Council and the European Parliament, should be maintained in order to provide transparency and visibility over the EU's progress towards the binding 2030 renewable energy target. Special attention should be given to regional initiatives, such as BEMIP.

Article 23 should grant reinforced legal means to the Commission to monitor progress. The Commission should make country-specific recommendations as part of every bi-annual reporting cycle in order to address challenges in meeting EU objectives in a timely manner. The Commission should intervene in case of counter-productive measures (e.g. negative impact on existing/future investments) to national regulatory frameworks.

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

PWEA has no opinion.

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)

The planning process for the post-2020 period has to start already today to allow investors to prepare the next investment cycle.

Currently, wind investors are faced with a lack of visibility on post-2020 regulatory frameworks as only 6 out of 28 Member States have commitments for renewables beyond 2020. This prevents timely investment decisions and endangers the bankability of renewable energy projects.

The European Commission should pursue an active political dialogue with Member States to ensure that concrete national- and regional commitments and enabling policies for renewables are in place well before 2019. The European Commission should stimulate regional approach to assure cost-effective integration of renewables into power markets.

Furthermore, national climate and energy plans should be approved by national governments and coordinated regionally. It is important in particular with regards to issues of cross-border electricity flows, required infrastructure and capacity adequacy.

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 economic situation in Europe as well as technology progress has changed significantly between 2010 and 2016. In fact, most of the national plans is outdated and require revision. The European Commission should therefore have a reinforced oversight over Member States' progress and the ability to make country-specific recommendations at every biennial reporting cycle in order to address challenges in meeting national objectives.

National plans should be updated in 2023 and 2028 (so every five years) in order to take into consideration the changing circumstances and to ensure that the EU is on track to reach the binding 2030 renewable energy target. If that is not the case, a regular revision will allow for the Commission to undertake the necessary corrective measures.

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 type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Energy Council	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Environment Council	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
National administration	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
National parliaments	<input 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 checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Regional fora	<input checked="" type="radio"/>	<input 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 checked="" type="radio"/>	<input 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 checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Environment Council	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
National administration	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
National parliaments	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
National stakeholders	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Neighbouring or other group of Member States	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Regional fora	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

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

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

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

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

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

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

	Very important	Important	Less important	Not important	No opinion
Only consultations should take place in the preparation of the plans leading to the draft plans	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Mutual reviews should be done on draft plans	<input checked="" type="radio"/>	<input 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 checked="" type="radio"/>	<input 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 checked="" type="radio"/>	<input 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 checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

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Contact

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