

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:

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 type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Effective and efficient implementation of EU legislation in the energy and climate field	<input type="radio"/>	<input checked="" 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 type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Better implementation of international commitments by the EU as a whole and by Member States (e.g. concerning the reduction of greenhouse gas emissions)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The Commission is better enabled to provide substantial and useful advice	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

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

Further to the Paris climate agreement, the EU is committed to tackle the issue of carbon emissions. This aim should now be at the core of the EU energy and climate policy and the significant difficulties encountered so far have to be addressed in the 2020-2030 framework

Indeed, a combination of an unexpected economic recession and the injection of large quantities of renewable electricity into power systems have triggered a lasting crisis in energy and carbon markets. Because the tools implemented to reach the targets set for RES, EE and decarbonisation were not sufficiently coordinated, the resources deployed could not be efficiently allocated. Prices create no incentive to invest in low-carbon technologies or to use the cleanest generation plants, which is why decarbonisation is at risk. Excess supply has driven wholesale prices down to levels that discourage investment, and retail prices have risen due to the feed-back from the cost of policies that are no longer very efficient.

This is why the EDF Group has long been advocating for efficient economic support mechanisms that can keep RES volumes and subsidies in check and allow them to be integrated efficiently into the market. The guidelines on State aid for environmental protection and energy introduced for the 2014-2020 period support this objective and, in practical terms, cause choices about support mechanisms to converge toward a few models that are the most efficient and best adapted to the market. The EDF Group believes it would be wise to continue on this path beyond 2020.

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 main inconsistencies in our views arise from the interlinkage between the EU ETS and the RES support that need to be addressed to ensure that carbon price become overtime the main and even the only driver to decarbonisation. Furthermore, given how quickly technologies and related costs are evolving, it is too early to say how investments should be split between renewable generations (electricity that would be largely decarbonised), the biomass used for final heat, biogas and biofuels, bearing in mind that the latter three reduce the EU's dependence on hydrocarbons. In other words it seems reasonable to refuse to set choices in stone today because they may prove inefficient.

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

Based on our comments in paras 1 & 2, we do believe that the corner stone of planning obligations should be the emission reduction strategy of the member states, encompassing all aspects of its energy strategy, e.g. impact of RES deployment on back-up and / or storage capacities, smart grids and prosumers behaviour, etc.

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

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)

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)

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)

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)

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

Effective and efficient implementation of EU legislation in the energy and climate field	<input 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 type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Better comparability of data from different Member States enabling an informed evaluation	<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 type="radio"/>	<input checked="" 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)

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

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)

Security of supply in the field of electricity should be coordinated also at a regional 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 and be based on a probabilistic approach of capacities available at any time. Member States' risk preparedness plans should include system adequacy assessments. Regional assessments are becoming more important as the market becomes more integrated. Some capacity mechanisms will be needed to ensure the availability of those capacities over the time. 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.

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)

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

Future obligations

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

	Very important	Important	Less important	Not important	No opinion
Security of supply	<input 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"/>

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

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

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

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

	Considerable Improvement	Improvement	No Change	Deterioration	Significant deterioration	No Opinion
Coherence of national plans and reporting formats among all EU Member States	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Effective and efficient implementation of EU legislation in the energy and climate field	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Achievement of the EU energy and climate objectives	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

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

<p>Better implementation of international commitments by the EU as a whole and by Member States (e.g. concerning the reduction of greenhouse gas emissions)</p>						
<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 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 checked="" 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)

EDF welcomes the Energy Union initiative as a consistent and comprehensive framework providing the EU with the appropriate tool to deal with the 2030 energy and climate targets.

Further to the achievement of the Paris agreement, the EU is now committed to decrease its GHG emissions by 40% in 2030 and this commitment implies that the EU pursues an integrated global approach in its energy and climate policy.

This global approach should be based on the principle that from now on any initiative taken in the frame of the EU energy and climate policy should have a positive impact on the decarbonisation path of the Union, which has not always be the case in the recent past.

Nevertheless, EDF is of the view that a too strigent governance scheme, based on a dedicated legislative act could be detrimental to the overall decarbonisation objective of the EU as it could impose costly and inefficient solutions at the EU level, without leaving the MSs enough freedom to take into account their national context and specificities to reach their own decarbonisation target, potentially increasing their financial burden and leading to loss of competition and negative reactions from the public.

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 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 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)

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.

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.

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)

The reporting obligations to be included in the integrated plans should encompass the 5 dimensions of the Energy Union and provide the MS with the appropriate tools to assess their progress towards emission reduction. Furthermore, these reporting obligations should also provide the Commission with the necessary data to follow up on its 2030 KPIs. The experience of the pre-2020 framework has shown that energy and climate policies impact energy and carbon markets, retail prices and security of power supply. For the 2030 framework, the EU therefore needs indicators which help check whether the transition reconciles sustainability, competitiveness and security of supply.

The EC has proposed quite a few indicators that EDF finds helpful in assessing progress towards a competitive and integrated market. EDF welcomes such an approach and suggests several additional indicators aimed at comprehensively ensuring that the transition reconciles the trilemma of energy and climate policies.

EDF recommends indicators on prices and the different components of the energy bill:

Integrating renewables in the electricity systems and driving the deployment of RES at an affordable cost are key to preserving competitiveness.

A third important aspect of the transition is balanced and cost-effective decarbonisation.

In the same token some dedicated indicators on security of power supply and on investment climate and a well-functioning power market could be usefully envisaged.

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)

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 MSs are likely to update their Plans depending on the evolution of many factors that are not fully predictable: evolution of the costs of different technologies, competitiveness issues, macro-economic context, etc. They must be able to adapt in order to avoid any crisis similar to the recent one that led to low wholesale and carbon prices and high retail prices

Some stakeholders have suggested that action should be taken if the National Plans do not result in reaching the energy climate targets, particularly the RES target.

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 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 type="radio"/>	<input checked="" 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 type="radio"/>	<input type="radio"/>	<input checked="" 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 type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Review national plans and analyse Member States' contributions	<input type="radio"/>	<input checked="" 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 type="radio"/>	<input checked="" 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 type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The plans should provide clear account of these consultations and how they are incorporated in the plans.	<input 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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