

# 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:

Danish Ministry of Energy, Utilities and Climate

Organisation (*where applicable*):

Danish Ministry of Energy, Utilities and Climate

Address:

Stormgade 2-6  
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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 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"/>
Achievement of the EU energy and climate objectives	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Increased certainty for investors across all EU Member States stimulating economic growth as well as research, innovation and competitiveness of the EU	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Better implementation of international commitments by the EU as a whole and by Member States (e.g. concerning the reduction of greenhouse gas emissions)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The Commission is better enabled to provide substantial and useful advice	<input 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)**

No answer

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

With regard to energy efficiency the planning obligations of the National Energy Efficiency Action Plans and Annual Reports (NEEAP's) could be integrated into one consolidated national plan on all planning obligations for energy. It is, however, hard to estimate the efficiency gains from this. If such a consolidated report will contain the same requirements as the NEEAPS' requirements, the efficiency gains from this might be smaller.

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

In general, all planning relevant for the Energy Union should be integrated in order to minimize administrative costs and integrated planning should also ensure that the Commission can keep track on the Member States' efforts and whether the EU is on track to reach the common EU-targets

**c) Are there any planning obligations that could be repealed?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

No answer.

[\*] 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)**

In general it would be beneficial to streamline the reporting and planning obligations for renewable energy. In this context, it is important to continue comprehensive planning and monitoring of national policies on renewable energy deployment which should be integrated into the new national climate and energy plans.

Article 4 in the current Renewable Energy Directive stipulate that each Member State should adopt a national renewable energy action plan. The national renewable energy action plans shall set out Member States' national indicative trajectories for the share of energy from renewable sources consumed in transport, electricity and heating and cooling, taking into account the effects of other policy measures relating to energy efficiency on final consumption of energy. The plans should also consider cooperation between local, regional and national authorities, planned statistical transfers or joint projects, national policies to develop existing biomass resources and mobilise new biomass resources for different uses.

It is important to continue the existing obligation to provide indicative trajectories for the share of renewable energy in consumption as part of the national climate and energy plans. The trajectories should still reflect the shares that are used in transport, electricity, heating and cooling. It should also be considered to include the gas sector - i.e. biomethane injected into the natural gas system. The national as well as EU policy measures should be described in the national plan and the effects of the national plans should be evaluated and transformed into projections for renewable energy deployment. The projections made by Member States with guidance from the Commission will be crucial for evaluating the level of ambition in the national plans and whether the binding EU target of 27 % share of renewable energy consumption in 2030 is likely to be met.

The national plans should continue to include measures of regional cooperation and regional coordination should play a more important role in the national plans for 2030.

**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)**

In general, all the planning obligations are important. Article 3 in the energy efficiency directive (EED) on the energy efficiency target is a central element of the Member States energy efficiency planning. Furthermore, article 7 on the energy efficiency obligation schemes is an important planning tool for the member states, as this article can create the greatest amount of savings in the EED. With regard to the Energy Performance of Buildings Directive, no obligations appear indispensable. The only planning obligation "National plans for nearly zero energy buildings" has already been carried out.

In general it would be beneficial to streamline the reporting and planning obligations for energy efficiency in the heating and cooling sectors with other planning and reporting EU-obligations in order to illustrate synergies between different subsectors of the energy sector In this context. It should be noted that - according to the recent published EU heating and cooling strategy - the potentials for synergies are considerable if energy services for heating and cooling purposes are integrated and further coordinated with electricity supply.

**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)**

No answer.

**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)**

The reporting obligations set out in Art. 5 (4)-(6) of the TEN-E Regulation appear necessary for the monitoring of the progress of the development of projects of common interest. However, in order to reap any tangible benefits from the reporting, it would seem necessary to follow up with other initiatives such as active discussions in the regional groups on how difficulties and delays can be prevented/mitigated.

**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)**

Commission regulation (EU) No 543/2013 article 11.1

In order to be able to move power from where it is available to where it is most needed and adjust portfolios accordingly, the market should be provided with information about planned and offered cross-border transfer capacities. According to Commission regulation (EU) No 543/2013 article 11.1 the TSO is obliged to report to ENTSO-E on the forecasted and offered capacity (MW) per direction between bidding zones in case of coordinated net transmission capacity based capacity allocation to ENTSO-E. This is an important indicator since it can show the availability on the interconnections and give an indication of where there might be bottlenecks or trade restrictions.

Commission regulation (EU) No 543/2013 article 13

As a result of the rapid deployment of intermittent generation sources away from consumption centres, transmission infrastructure has increasingly gotten congested in large parts of Europe. To relieve congestions TSOs have increasingly intervened in market operations instructing market participants to change their generation or trading commitments. In order to enable the market to understand where and why congestion management measures have become necessary, TSOs need to provide timely, detailed and reasoned information about their actions. Useful indicators include the obligations for the TSOs to report to ENTSO-E on the following:

Information relating to congestion management measures:

A. information relating to dispatching per market time unit, specifying:

- the action taken (that is to say production increase or decrease, load increase or decrease),
- the identification, location and type of network elements concerned by the action,
- the reason for the action,
- capacity affected by the action taken (MW);

B. information relating to countertrading per market time unit, specifying:

- the action taken (that is to say cross-zonal exchange increase or decrease),
- the bidding zones concerned,
- the reason for the action,
- change in cross-zonal exchange (MW);

C. the costs incurred in a given month from actions referred to in points (a) and (b) and from any other remedial action.

Regulation (EC) No 714/2009

Lastly, the Regulation (EC) No 714/2009 provides conditions for cross-border access to the network. National energy regulators monitor the TSOs income on congestions. This is an important indicator as (EC) No. 714/2009 stipulates that income from congestion should be invested in ensuring the availability of the allocated capacity or in maintaining or increasing interconnection capacities through network investments, in particular in new interconnectors. Monitoring income from congestion provides an indication of how the

interconnector is utilised and whether capacity should be increased.

**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)**

No clear picture exists on the administrative burden of the current planning and reporting obligations, but as a matter of principle, a lower administrative burden is always a priority.

***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"/>

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

Energy Data is generally reported to EUROSTAT at the same time as the same data are used for the reportings under the Renewable Energy Directive, the Energy Efficiency Directive (article 24 (1)), etc. It should be considered whether the Commission, on the basis of the EUROSTAT reportings, could make the necessary calculations, instead of receiving the same data from Member States under different directives.

Another example is the effect on CO2 emissions of deployment of Renewable Energy which is being reported every two years, in December, under the Renewable Energy directive. At the same time, every second year in March an obligation under the MMR requires member states to report ex-post and ex-ante estimated GHG reduction effects of implemented policies and measures. This is an area where a streamlining of reporting could be considered.

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

With regard to NEEAPs (EED) it will make sense to include all of the building area policies into this one report and streamline these with the Energy performance of Buildings Directive (EPBD) reporting obligations. Today the EPBD requires annual reporting which has overlaps with the NEEAPs: The reporting obligation under EPBD, Article 10 ("draw up a list of proposed measures and instruments including those of a financial nature, other than those required by the EPBD, which promote the objectives of the Directive" Much of the same information is provided in NEEAPs. Accordingly the reporting obligation should be transferred completely to the EED (NEEAP) (currently optional).

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

No answer.

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

Not necessarily. It is of great importance that Member States are obliged to report on their obligations in order to allow the Commission to keep track of the efforts in the Member States as well as on whether the EU is on track towards reaching the common EU energy and climate targets

[\*] 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)**

The most indispensable reporting obligation is the quantification of the progress made by Member States with regards to the national deployment of renewable energy in the energy and transport sector. The progress should be evaluated every two years with regards to the efficiency of existing policies and the progress made towards a national indicative renewable 2020 trajectory.

The Commission should provide a template for the reporting and specify how the gross final consumption of electricity, transport, heating and cooling from renewable energy sources should be calculated by the Member States. This will be crucial in order to keep track of the collective progress made by the Member States towards the binding EU target of at least 27 % renewable energy consumption in 2030.

The monitoring of bioenergy sustainability should be continued and strengthened as part of a new comprehensive EU bioenergy policy that covers both solid biomass, biofuels and biogas for electricity, heating, cooling and transport.

**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)**

In Article 24.1 of the Energy Efficiency Directive and annex XIV part I, a rather large number of annual reports are required, including annual statistics for electricity and heat generation from CHP-plants and industrial waste plans. In Annex XIV, part 2, national energy efficiency action plans shall be prepared every three years, including assessments of progress achieved in implementing the comprehensive assessments according to Article 14.1 in EED.

Future reporting should be streamlined and have a well-defined purpose, e.g. according to monitoring of European wide progress for achieving EU targets in 2030. Annual reporting of statistical information should be limited taking into account that such reporting to a large extend already is reported to EuroStat by MS.

**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)**

No answer.

**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)**

The reporting obligations set out in Art. 5 (4)-(6) of the TEN-E Regulation appear necessary for the monitoring of the progress of the development of projects of common interest.

However, in order to reap any tangible benefits from the reporting, it would seem necessary to follow up with other initiatives such as active discussions in the regional groups on how difficulties and delays can be prevented/mitigated.

**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)**

1) Wholesale price convergence: Today the national energy regulators report on the wholesale price convergence to ACER. The convergence of wholesale electricity prices can be regarded as an indicator of market integration and the free flow of electricity between price zones. Price difference indicates bottlenecks, but the optimal level of market integration does not necessarily require full price convergence. It is a simple indicator that can show the degree of market coupling. However, it is difficult to set a target for actual convergence, since an optimal level of market integration does not necessarily require full price convergence.

2) Share of electricity traded on the day-ahead and intraday market measured in relation to gross consumption and production of electricity. Today, the national energy regulators collect this information. It will be a useful indicator in a European governance system for transparency, competition and market coupling.

3) Bottlenecks related to three types of issues: Market integration (between price zones), generation connection, security of supply. Today ENTSO-E reports this information in their TYNDP reports. The information is important as it identifies where new interconnections need to be built or reinforced on a European level. Furthermore, the information is illustrative in order to show where more regional cooperation would be beneficial.

4) Probabilistic approach for power adequacy assessments  
Power adequacy could be an important indicator on security of supply. The power system adequacy should be based on a probabilistic approach as this provides a more accurate picture of the probability of having sufficient power to satisfy consumption. A probabilistic model ensures that the intermittent nature of wind and solar based production, small-scale hydro, small and large power plants, combined heat and power, demand side response, transmission lines as well as interconnectors are represented in the calculation in a manner that more accurately reflects their contribution to capacity adequacy. A probabilistic method would also make it easier to analyse the potential for more shared security of supply across borders. And finally, a probabilistic approach would provide more correct decisions on new investments to improve security of supply.

The European governance system should define a set of common indicators to evaluate system adequacy based on a probabilistic approach. This will enable a more accurate comparison of system adequacy across Member States. The indicators should reflect the potential capacity shortage after all market instruments (spot, intraday, balancing market) has been applied. The indicators could be Loss of Load Probability (LOLP) and Expected Unserved Energy (EUE).

**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)**

Investments in R&I is the most indispensable element. Reporting on R&I funding is done on an annual basis to the IEA and has been done so consistently since 2002. The IEA database is to a wide extent useful however there are no mechanisms to ensure that countries report to the IEA.

Information on funding programmes could be a useful additional indicator.

**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)**

No clear picture exists on the administrative burden of the current planning and reporting obligations, but as a matter of principle, a lower administrative burden is always a priority.

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

**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>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<p>Increased certainty for investors across all EU Member States stimulating economic growth as well as research, innovation and competitiveness of the EU</p>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

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

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

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

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

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

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

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

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

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

Denmark supports a streamlining of the current planning and reporting obligations with the aim of creating a common framework for measuring progress towards common energy and climate objectives. Such a common framework should cover the five dimensions of the Energy Union: supply security, a fully Integrated internal energy market, energy efficiency, climate action and research & innovation.

The purpose of a new framework should be multiple: to facilitate a better overview of progress towards the five dimensions, to ensure that Member States comply with obligations, and to bring down administrative costs. A number of the existing planning and reporting obligations are mandatory for Member States and to the extent these are replaced by other obligations as part of the national plans, these should be mandatory too.

Variation with regard to the mandatory nature of planning and reporting could be allowed. E.g. measures that are not mandatory to report on today should not necessarily become mandatory as part of the national plans.

**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 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)**

This has been addressed in previous answers.

**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)**

This has been addressed in previous answers

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

No answer.

**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 political process will to a large extent depend on the final design and content of the national plans. With reference to question 31, 33 and 34 it is likely that national administration and the Commission will play a big part in the administration of planning and reporting.

**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)**

Regular updates of the National Energy and Climate Plans are required at given intervals, due to technology development, changes in prices, and other circumstances

## ***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 type="radio"/>	<input checked="" type="radio"/>
European Council	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Energy Council	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Environment Council	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
National administration	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
National parliaments	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
National stakeholders	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" 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 type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

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

	Very relevant	Relevant	Less relevant	Not relevant	No opinion
European Commission	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
European Parliament	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
European Council	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Energy Council	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Environment Council	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
National administration	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
National parliaments	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
National stakeholders	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" 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 type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

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

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

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

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

	Very important	Important	Less important	Not important	No opinion
As part of their national integrated plans Member States should jointly develop regional objectives, standards and common coherent strategies on the relevant dimensions of the Energy Union.	<input type="radio"/>	<input type="radio"/>	<input checked="" 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 type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Mutual reviews should be done on draft plans	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Mutual reviews should be also used for progress reports assessing the implementation of plans	<input type="radio"/>	<input 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 checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
A dedicated system of mutual reviews should be established including the creation of adequate fora	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

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**Contact**

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