

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*):

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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 type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Achievement of the EU energy and climate objectives	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Increased certainty for investors across all EU Member States					

stimulating economic growth as well as research, innovation and competitiveness of the EU	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Better implementation of international commitments by the EU as a whole and by Member States (e.g. concerning the reduction of greenhouse gas emissions)	<input 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)

The aspect of planning with the aim of security of supply at affordable price seems to be downplayed in planning initiatives at EU level. Long-term energy planning in terms of energy policy and energy mix formation should remain primarily in the Member States' competences in accordance with the Lisbon Treaty. However, as far as there are 2030 common objectives and EU-wide targets (as in renewables and energy efficiency) there is an essential need for a common, coordinated EU approach to energy planning. First of all, the EU-wide energy planning should respect the subsidiarity principle which should be strictly applied to the Energy Union measures. If the Member State is capable of sufficiently achieving objectives of the proposed action, the EU should interfere only to the extent which is essential to attain commonly agreed objectives and only when evidence shows that the task cannot be managed by the Member States itself.

For example, the Member States with relatively low import dependency should be presumed to be better prepared to attain the security of supply objective and the scope of the EU intervention should be limited respectively.

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)

Overlaps in the planning obligations in the energy and climate area seem to be unavoidable. The focal point should be placed on the consistency of the already established planning activities. Especially the consistency should be provided due to the overlapping character of different emissions reduction measures:

- 1) The preparation of low-carbon development strategies (LCDS) and updates, national adaptation planning and strategies and Low-carbon development strategy under the regulation (EU) No 525/2013;
- 2) Reporting under the Effort Sharing Decision and Union approximated

greenhouse gas inventory together with Kyoto and EU 2020 progress Report;

3) Action plan on alternative fuels for transport and Report on calculation of life cycle greenhouse gas emissions from biofuels and Annual Monitoring CO2 emissions from cars;

4) The monitoring of the security of supply within different regulatory measures also should be integrated. Currently, the security of supply is monitored separately under the 2009/72/EC Directive and the 2005/89/EC Directive.

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

According to the general objective of the EU climate policy which is to reduce the greenhouse gas emissions, instead of the three different CO2 emissions reports (reporting under ESD, LULUCF decision, ETS Directive) there should be provided one integrated GHG emissions report, which could envisage in particular the contribution of all eligible sectors to the overall CO2 emissions. It should help to facilitate which sectors still have a reduction potential in order to facilitate the overall cost-effectiveness of GHG emissions reduction. For example, in accordance with the cost abatement curve of GHG reductions in Poland below - the lowest cost of emissions reductions is found outside of the ETS sectors (on the left-hand side):

[Chart 1: 2050 Cost curve for greenhouse gas abatement - attached below]

The planning should therefore help policy-makers determine which sectors of economy should be particularly subject to further emissions reduction measures in a cost-effective way.

However, this inter-sectoral approach should be specified at the national level in the manner which would reflect the different situation in particular sectors and different country-specific opportunities.

The overall adequacy of the electricity system to supply current and projected demand for electricity which is monitored under the SoS Directive should be updated and streamlined in line with the adequacy system methodology, which will be developed in accordance with the new Electricity Market Design.

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

The National Investment Plan under art. 10c of the EU ETS Directive 2003/87/EC should be kept separate from overall emissions reduction planning, as it is a measure with a very specific aim to balance annual free allocation for the power sectors eligible for a derogation. This plan needs to be assessed under a different regulatory regime, where the Commission has wide competence under the ETS Directive.

The scope of the integrated plan should be limited by the EU institutions and

the Member States competences. It should be assumed that the field of energy belongs to the shared competences, therefore Member States are free to legislate unless the EU decides to exercise its power. However, the EU competence in the energy field is limited by the Member States energy rights declared in the article 194 TFEU. The new Energy Union governance framework must recognize these limitations which follow from the primary EU law – Treaty rules.

Taking into account the legal context, the integrated plan should not cover planning obligations connected with the ENTSO-E or ACER competences and national independent operators. Especially the grid and interconnectors facilities which are under the competences of the Transmission System Operators.

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

The planning obligations are necessary to provide the long-term perspective, which should create the predictable business environment. We do not see any planning obligations which should be indeed repealed, but as we indicate some of them could be merged. However, some of the planning obligations should remain the Member States competence in line with the logic adopted in the answer to the question 3b.

[*] By streamlining we understand the possibility to integrate planning and reporting obligations resulting from (different) sectorial legislation by reducing possible duplications or gaps in the reporting and planning obligations, thereby ensuring transparency, coherence, relevance, efficiency and effectiveness of the reporting and planning. Furthermore planning and reporting cycles should be harmonised to the extent possible.

4) Which elements/articles of the current planning obligations in the field of renewable energy do you consider indispensable and why? If relevant please, refer to specific [Articles of the Renewable Energy Directive](#). (up to 1000 characters)

The most indispensable element of the currently planning obligations in the field of renewable energy is the National Renewable Energy Action Plan, which is laid down in the Article 4 of the Renewable Energy Directive. The content of the NREAP is not legally binding, however, it predominantly influences national energy policy and should be implemented in the most cost-effective way. Especially, the indicative renewables growth trajectory in the energy mix share and cost-benefit analysis of further renewables development are important parts of the NREAP.

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)

The planning framework within the sphere of energy efficiency and energy performance of buildings should be reconsidered. It is indispensable to

include the energy efficiency issues in the governance framework provided by the Energy Union, however it is not sufficient enough to organise the renovation of the residential and commercial buildings by means of central planning. So implementation of the long-term strategy for mobilizing investment in renovation of the national stock of residential and commercial buildings prepared under the article 4 of the Energy Efficiency Directive will depend on the incentives addressed to private investors.

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)

The low-carbon development strategies are based on the Monitoring Mechanism Regulation (Regulation (EU) No 525/2013) and Commission Implementing Regulation (EU) No 749/2014. These instruments state that the low-carbon development strategies should contribute to the transparent and accurate monitoring of the actual and projected progress to limit the anthropogenic GHG emissions and meeting the greenhouse gas emission reduction commitments (Article 4 MMR). The EU legislation does not specify the accurate content of the LCDS, however it should be noted that only the sole preparation of the reporting part of the LCDS should be the subject to the EU-wide harmonisation. The other content of the LCDS (e.g. the priorities and measures) should be perceived as the elements which are planned and decided at the Member State level in accordance with their energy policy priorities.

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 energy infrastructure planning should remain within the Member State's competence. It should be conducted by national authorities and Transmission System Operators (TSOs). The EU-level energy infrastructure development planning should be the consequence of the Member States decisions taking into account the issue of regional cooperation. The projects of common interest (PCIs) depict that the EU level planning could be perceived as being a useful tool to support the transboundary energy infrastructure development, however the usage of the CEF funding as well as the submission of each project to be qualified as the PCI should remain optional and lay upon the decision made by the Member States competent units and authorities.

8) Which elements/articles of other existing planning obligations in the field of energy, including on security of supply, infrastructure and market integration do you consider indispensable and why? (up to 1000 characters)

There is no need for further enhancing of other existing planning obligations.

9) Can you provide qualitative or quantitative evidence on the administrative burden on Member States and other stakeholders resulting from planning obligations at EU level? (up to

1000 characters; a possibility to upload further evidence is provided at the end of the questionnaire)

The administrative burden on Member States and other stakeholders resulting from planning obligations at EU level is not a subject of the separate quantitative measurement in the Polish public sector. The qualitative evidence of the administrative burden for planning obligations also is not self-evident. Due to the organizational structure it is not possible to draw a clear line between burdens caused by the planning obligations at the national level (e.g. the preparation of the national energy policy) and the planning obligations caused solely by the EU legislation.

Future obligations

10) What level of importance do you attach to future planning obligations for Member States in the following key elements of the Energy Union Strategy?

	Very important	Important	Less important	Not important	No opinion
Security of supply	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Internal Energy Market	<input type="radio"/>	<input type="radio"/>	<input checked="" 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 type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Research, Innovation and competitiveness	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

C. Evaluation of reporting obligations






Existing obligations

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

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

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

	Very important	Important	Less important	Not important	No opinion
Coherence of reporting formats among all EU Member States	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Possibility to monitor the performance and trends (and put in place corrective measures if the results are lagging behind)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Effective and efficient implementation of EU legislation in the energy and climate field	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Assess progress to targets at Member State level and enable aggregation of data at EU level	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Better comparability of data from different Member States enabling an informed evaluation	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Increased certainty for investors across all EU Member States stimulating economic growth as well as research, innovation and competitiveness of the EU	<input 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					
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If other, please explain: (up to 1000 characters)

All of the abovementioned aspects are strongly interconnected and it is difficult to prioritise them. However, energy security and affordability of energy issues are missing. So, priority is given to the climate protection pillar, while others seem to be disregarded.

It is worth to underline that the decarbonisation of the energy sector in Europe is conditional – the EU target in this regard is dependent on long-term actions of global players in terms of GHG reductions as stated in many EC conclusions starting from 2009.

Among the various regulatory factors, increased certainty for investors appears to be the underestimated factor.

There should also be a consistent application of the Better Regulation Package requirements (including Impact Assessment) to the energy legislation proposals, which could facilitate further implementation e.g. by the clearly defined planning and reporting obligations.

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)

The reporting obligations under the governance framework, which are being planned should especially be preceded by a thorough consideration of key indicators. The preliminary list of key indicators was presented in November 2015 as the SWD accompanying the State of the Energy Union report, however PKEE urges the EC to organise separate public consultations on this subject.

The indispensable elements of the reporting obligations should be primarily based on the import dependency factor, which should reflect the indigenous fuels share in the country-specified energy mix and the energy poverty index,

which reflects the social context of energy transformation. The methodology used to estimate the electricity interconnection capacity between MS should also be further discussed. Currently, it does not refer to the unintended cross-border electricity flows ("loop flows"), which in practice reduce the import and export capacity of Poland.

Electricity prices for end consumers, particularly for energy-intensive industry (carbon leakage threat) and households (energy poverty threat) should be taken into account in planning of energy policy measures. The same goes for the security of supply issue - which need to be assessed at Member State level based on national preconditions and energy sources. For a country like Poland, decarbonisation policy will lead to higher energy dependence due to a switch from domestic coal and lignite to imported natural gas. This may be different in Member States. PKEE's response to the consultation on security of electricity (October 2015) addresses the question of security of supply in more details.

19) Which elements of the current reporting obligations in the field of energy research and innovation do you consider indispensable (investments in R&I, R&I funding programmes and projects and direct funding to institutions) and which information is publicly available or reported to other organisations? How can this reporting be made more consistent between Member States and more updated so that it can support more transnational cooperation in this field? (up to 1000 characters)

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

The administrative burden on Member States and other stakeholders resulting from reporting obligations at EU level is not a subject of the separate quantitative measurement in the Polish public sector. The qualitative evidence of the administrative burden for reporting obligations also is not self-evident. Due to the organizational structure it is not possible to draw a clear line between burdens caused by the reporting obligations at the national level (e.g. the preparation of the national energy policy) and the reporting obligations caused solely by the EU legislation.

Future obligations

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

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	Very important	Important	Less important	Not important	No opinion
Security of supply	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Internal Energy Market	<input type="radio"/>	<input type="radio"/>	<input checked="" 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 type="radio"/>	<input checked="" 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 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 type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Achievement of the EU energy and climate objectives	<input type="radio"/>	<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)						
Increased certainty for investors across all EU Member States stimulating economic growth as well as research, innovation and competitiveness of the EU						
Better implementation of international commitments by the EU as a whole and by Member States (e.g. concerning the reduction of greenhouse gas emissions)						
The Commission is better enabled						

to provide substantial and useful advice and ensure uniform application of EU legislation						
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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 checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Effective and efficient implementation of EU legislation in the energy and climate field	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Achievement of the EU energy and climate objectives	<input type="radio"/>	<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	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>







measures if the results are lagging behind)						
Increased certainty for investors across all EU Member States stimulating economic growth as well as research, innovation and competitiveness of the EU						
Better implementation of international commitments by the EU as a whole and by Member States (e.g. concerning the reduction of greenhouse gas emissions)						
The Commission is better enabled to provide						

substantial and useful advice and ensure uniform application of EU legislation						
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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 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"/>
Possibility to monitor the performance and trends (and put in place						

corrective measures if the results are lagging behind)						
Increased certainty for investors across all EU Member States stimulating economic growth as well as research, innovation and competitiveness of the EU						
Better implementation of international commitments by the EU as a whole and by Member States (e.g. concerning the reduction of greenhouse gas emissions)						
The Commission is better enabled						

to provide substantial and useful advice and ensure uniform application of EU legislation						
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27) In your view, what should be the nature of the initiative to best streamline the planning and reporting obligations in the framework of the governance of the Energy Union?

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

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

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

The non-binding guidance is the best solution to establish the effective Energy Union governance framework (without any additional administrative burden). The following reasons are justifying the non-binding guidance choice:

1) Energy Union governance framework relates to the wide scope of issues, some of them are already the subject of the well-developed EU legislation (e.g. the RES share in the energy mix, GHG issues), some of them still remains primarily the Member State's competence (e.g. energy policy formation, security of supply, the research policy). If the governance framework would cover all of these issues it must be made by the soft-law measure in order not to impose new obligations, which are not the subject of the EU regulations;

2) The comprehensive non-binding instrument could provide better guidelines to the public administration on the best Energy Union governance performance. The flexibility which could be provided rather by the guidelines than the legislation, is essential to ensure the proper implementation of the regional coordination which will be probably provided by the Energy Union governance.

Non-binding guidance is most in line with the principle of subsidiarity in terms of energy policy formation and fuel mix choices which are left to national governments. Legislation would go too far in the direction of centralised policy planning and away from national sovereignty of national policies and the energy mix.

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

30) a) Building further on your replies to the sections devoted to the existing planning and reporting obligations (questions 1-21), which of the areas/articles subject to current planning obligations should be included in the integrated National Energy and Climate Plans? Please explain. (up to 1500 characters)

The following planning issues should be covered by the National Energy and Climate Plans:

1) The GHG emissions in the light of the security of supply and affordability of energy in respective Member States (EU energy policy triangle). The implementation of the EU energy policy should take a holistic, cost-effective approach to the environmental objectives, it should be focused on the sectors which did not contribute to reductions and have a high potential to do so.

2) The electricity interconnection capacity which reflects the revived methodology of the interconnector's capacity estimation. The current methodology does not reflect the congestion caused by the non-market uncoordinated flows;

3) The integrated National Energy and Climate Plans should deliver the future energy mix structure. It is crucial to provide the long-term targets to plan the energy transformation in most cost-effective and evolutionary way. The

plans should reveal the clear destination trajectory for the energy sector-
having in mind the conditional nature of EU decarbonisation targets;

4) The integrated National Energy and Climate Plans should be also focused on the social context which is connected with the competitive electricity prices for industry and the avoidance of the energy poverty risk for households, therefore the projection of the future electricity prices is crucial to plans for implementation.

b) Building further on your replies to the sections devoted to the existing planning and reporting obligations (questions 1-21), which of the areas/articles subject to current reporting obligations should also be included in the integrated National Energy and Climate Plans? Please explain. (up to 1500 characters)

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

The integrated National Energy and Climate Plans should cover the most part of the national energy policy. However, the risk preparedness plans, should be the subject of separate planning under the Security of Supply legislation. Also, the key issues connected with the transmission grid development should be the subject of the primarily national TSO's planning, which could be revealed to the some extent in the National Energy and Climate plans.

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 energy policy making process is dedicated to the government (especially the Ministry of Energy and the Ministry of Environment). The role of the stakeholders and national parliament appears to be advisory and subject to remarks. The necessary element of the stability of the National Energy and Climate Plans is the common agreement reached by the various political options on the long-term vision of the national energy-mix. The strategic decisions in the energy field (such as the choice between nuclear or conventional energy) are made in the long-term perspective and should be constantly implemented irrespective of the current government political preferences. It is the high-qualified administration staff duty to implement the energy policy in predictable manner which should take into account different interests. However, it is the matter of domestic legislation which is not the subject of the European Union intervention according to the subsidiarity principle.

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 main factors that could justify an update of the National Energy and Climate Plans in the period 2021-2030 are:

- 1) The feedback from the neighbouring countries and the EC given in the national plans adoption process.
- 2) Changing regulatory framework and energy market trends.
- 3) National plans should be also adjusted to the national energy policy, however the relevant changes in the national policy should not occur in the short-time perspective, as it is referred in the answer to the question 31.
- 4) Each of the Member State should have had the guaranty of the special clause which allows to adjust the national plans to the other factors (such as the security of supply or the level of prices for end consumers) which could affect its key energy policy priorities.

E.2 Role of different institutions in the governance process

33) How relevant would you rate the role of different institutions in the development of integrated National Energy and Climate Plans?

	Very relevant	Relevant	Less relevant	Not relevant	No opinion
European Commission	<input type="radio"/>	<input 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 checked="" type="radio"/>	<input 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 checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

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

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

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

Approve national plans	<input type="radio"/>	<input type="radio"/>	<input checked="" 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 type="radio"/>	<input type="radio"/>	<input checked="" 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 type="radio"/>	<input checked="" 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"/>

Please upload your files here:

94672567-1683-4519-9ccb-e9d9bfb90430/Chart_1_2050_Cost_curve_for_greenhouse_gas_abatement.

Thank you for your participation!

Contact

