

CONSULTATION ON STREAMLINING OF PLANNING AND REPORTING OBLIGATIONS AS PART OF THE ENERGY UNION GOVERNANCE

Fields marked with * are mandatory.

What this consultation is about

The Commission's State of the Energy Union presented on 18 November 2015 states that "[t]he Energy Union needs a reliable and transparent governance process, anchored in legislation, to make sure that energy-related actions at European, regional, national and local level all contribute to the Energy Union's objectives." This corresponds to similar calls from the European Council and the European Parliament[*].

The State of the Energy Union also underlines that "[i]ntegrated national energy and climate plans, addressing all five dimensions of the Energy Union, are necessary tools to have more strategic planning", and that "[i]n order to track progress, a transparent monitoring system needs to be put in place based on key indicators as well as on Member States' biannual reports concerning progress made on their national plans". This builds further on the Commission's Communication on the Energy Union from February 2015, which explained that a purpose of the governance process for the Energy Union is to "streamline current planning and reporting requirements, avoiding unnecessary administrative burden".

In this context, the present consultation seeks stakeholders' views on current planning and reporting arrangements in the energy field, and on how these could be improved to better serve the objectives of the Energy Union and to reduce administrative burden. An overview of existing planning and reporting obligations in the energy sector concerning the Member States as well as the Commission is available here: [COM planning and reporting obligations \(energy field\)](#); [MS planning and reporting obligations \(energy field\)](#); [COM planning and reporting obligations \(climate field\)](#); [MS planning and reporting obligations \(climate field\)](#).

The responses to the public consultation will feed into the Commission's evaluation and fitness check of existing planning and reporting obligations (a REFIT initiative in the Commission's 2015 Work Programme) as well as into the Impact Assessment for the Commission's proposal(s) for streamlining of planning and reporting in the energy field foreseen for late 2016, as announced by the State of the Energy Union.

The consultation as well as the initiatives it will contribute to should be understood in the broader context of the Energy Union strategy; the Commission's guidance to Member States on national plans from 18 November 2015, and the Council's Conclusions on Energy Union governance from 26 November 2015 – which underscore the need for holistic national plans that address all five dimensions of the Energy Union in an integrated way.

This public consultation also relates to the preparation of other initiatives to implement the Energy Union foreseen for 2016 (notably initiatives on energy efficiency, renewable energy and electricity market design). For other completed and ongoing public consultation processes and their outcomes, see: <http://ec.europa.eu/energy/en/consultations>.

[*] REF to EUCO October 2014 and March 2015; EP 15 Dec 2015.

The questionnaire is structured as follows:

- A. Respondent's profile
- B. Evaluation of existing planning obligations
- C. Evaluation of existing reporting obligations
- D. Options for streamlining planning and reporting obligations
- E. Options for the governance of the Energy Union

Questions marked with an asterisk (*) are mandatory.

*

A. Respondent's profile

Please provide information to help us build your profile as a respondent. In accordance with Regulation 45/2001[*], all personal data collected through this survey will be kept securely and will ultimately be destroyed.

[*] Regulation (EC) No 45/2001 of the European Parliament and of the Council of 18 December 2000 on the protection of individuals with regard to the processing of personal data by the Community institutions and bodies and on the free movement of such data, OJ L 008, 12.1.2001, p.1.

A.1 Are you answering as an individual or on behalf of an organisation/institution?

- I am answering as an individual.
- I am answering on behalf of an organisation.

A.2 Please specify your main field of activity.

Please tick the appropriate field. Only one choice is possible:

- Individual citizen
- National public authority (central or local government)
- Private company/ Industry association
- International organisation
- Workers' organisation/trade union
- Research organisation/university
- NGO
- Other interest group organisation/association

Other - please specify:

*

A.3. Please indicate your country of residence/establishment:

If answering as an individual, please provide your country of residence.

If answering on behalf of an organisation/institution, please provide the country of establishment of the organisation/institution.

Please tick the appropriate field, only one choice is possible.

- Austria
- Belgium
- Bulgaria
- Croatia
- Cyprus
- Czech Republic
- Denmark
- Estonia
- Finland
- France
- Germany
- Greece
- Hungary
- Iceland
- Ireland
- Italy
- Latvia
- Liechtenstein
- Lithuania
- Luxembourg
- Malta
- Netherlands
- Norway
- Poland
- Portugal
- Romania
- Slovenia
- Spain
- Sweden
- Slovakia
- Switzerland
- United Kingdom

Other/international - please specify:

*

A.4 Name and contact details

- I prefer to provide a general comment only. Please provide your general comment in the box below. (up to 2000 characters)
- I will provide my name and contact details in the boxes below.

[Questionnaire ends here]

Name:

Organisation (*where applicable*):

Address:

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

Telephone:

Email:

[*] In the interest of transparency, organisations (including, for example, NGOs, trade associations and commercial enterprises) are invited to provide the public with relevant information about themselves by registering in the Interest Representative Register and subscribing to its Code of Conduct. If you are a registered organisation, please indicate the name and address of your organisation and your Register ID number on the first page of your contribution. Your contribution will then be considered as representing the views of your organisation.

*

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

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

B. Evaluation of planning obligations

Existing obligations

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

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

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

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

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

EU climate and energy planning for 2030 and 2050 must be legally binding. Member States (MS) must produce plans in line with a binding template, and report on those plans regularly. EU MS climate and energy planning must ensure that the EU achieves or surpasses its 2030 goals and is on track to an efficient energy system based only on sustainable renewables by 2050 at the latest. These plans must reassure investors in the absence of binding national targets. Investors must be confident to participate in efficiency and renewables projects. The plans should build upon existing plans (NREAP/NEEAP), and provide details for all relevant sectors, technologies, policies, and measures. These plans should be fully in line with global climate and energy ambition, including efforts to limit global temperature rises to 1.5°C. As well as promoting energy efficiency and renewable energy these plans must provide for the retiring of polluting power plants and phase out of fossil fuel subsidies.

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)

A number of problems with the current climate and energy planning regime should be addressed in the 2020 to 2030 framework. Firstly, the templates for the different plans should all be set out in EU and Member State legislation. Second, each of the EU climate and energy targets (greenhouse gasses, renewable energy and energy efficiency) for 2030 should be made binding at the national level, so that each of the national planning regimes carries equal weight. Third, 2030 planning would be assisted by the European Commission using the same data, assumptions, and scenarios across policy areas. For example, the security of supply package from 16 February 2016 used a low 25% energy efficiency scenario for 2030 to assess Europe's gas import dependency and a higher 30% scenario for the heating and cooling strategy. Furthermore, bodies such as ENTSO-E/G should use the same modeling inputs to ensure consistency of Member State and EU climate and energy planning.

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

National plans should cover both medium-term (2030) and long-term (2050) climate and energy planning horizons. Plans for 2030 need to take full account of the long-term vision decarbonisation, as it breaks down into policies and measures for all economic sectors. An integrated approach should be achieved through an architecture that operates at three mutually reinforcing levels:

1. Political commitments: including national targets on renewable energy, energy efficiency, and greenhouse gas emissions reductions;
2. Detailed 2030 policies and measures: covering the national climate and energy plans that EU Member States will put in place in order to both deliver and also to monitor progress towards their 2030 targets;
3. Energy transition plans: setting out how the policies that will deliver the 2030 targets will be adapted or continued in order to ensure each EU Member State contributes adequately to the meeting of the EU's 2050 emissions reduction goal.

This architecture must build on current planning and reporting requirements such as NREAP/NEEAP and low carbon development strategies. WWF is undertaking a LIFE funded project to strengthen LCDS (see www.maximiser.eu for details)

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

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

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

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

Post-2020 national plans should capitalise on NREAPs. In particular, planning for overall and sectoral renewable energy shares by 2030, using indicative trajectories and a binding template (Art. 4/ Annex VI), is indispensable. Member States should define the renewable energy element of their national plans by building upon their national targets for 2020. The renewables share per sector and type of energy source should be maintained to provide investors with broad market expectation. Plans should include indicative trajectories so that progress towards the EU renewables target can be monitored. National plans should outline measures to incentivise accelerated RES rollout, including support mechanisms, planned reinforcements of transmission/distribution infrastructure, and streamlining of administrative procedures. National plans should be based on a standardised, binding template to ensure coherence and comparability between Member States' contributions to the overall European target.

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)

All planning obligations currently included in the EED and the EPBD should be maintained. Deadlines for key EED planning obligations have already passed. MS now have to report on their progress in delivering these plans. All EED reporting obligations included in NEEAPs should be maintained beyond 2020. In particular, current EED provisions that are being considered for revision, such as articles 1, 3 and 7, need to be safeguarded and improved for the post-2020 period. Post-2020 national plans should capitalise on NREAPs by maintaining and building upon current planning obligations. National Energy Efficiency Action plans (Article 24.2 and Annex XIV part 1) must continue, as must the planning and reporting requirements under articles 7 and 4. The EU must be able to monitor national trajectories towards the EU target. Otherwise, in the absence of national targets, it would not be possible for the EU to know how MS are performing towards common EU goals.

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 EU and its Member States have committed and have clear obligations to develop low-carbon strategies, both under the Cancun Agreements and the Paris Agreement. The Paris Agreement clearly calls for net zero emissions in the second half of this century and it would from an equity perspective be consistent for all EU Member States to plan the full phase-out of emissions by the middle of this century. Also, Article 4 of the MMR regulation stipulates that all Member States need to develop low-carbon strategies, and report on the status of their implementation by January 2015. As many Member States missed this deadline, reporting on the development and review of carbon phase out strategies should be ensured on a regular basis. These low carbon development strategies must, therefore, form an integral part of the modular planning structure described in answer 3a.

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)

MS must report planned investment in interconnections for a period of at least 5 years (Security of Electricity Supply Dir. Art. 7) and TSOs must submit to National Regulatory Authorities (NRAs) a 10-year development plan (Electricity Dir., Art. 22). DSOs should consider efficiency/DSR solutions to supplement the need to upgrade/replace network reinforcement from a system perspective (Electricity Dir., Art. 25). MS should also plan the deployment of smart grids alongside the necessary regulatory framework from NRAs. The PCI selection procedures (Reg. 347/2013) should be more transparent and include better safeguards to prevent PCI status going to projects damaging to the environment and incompatible with EU environmental acquis. Selection should be based on scenarios in line with EU climate and energy objectives. TSOs also need to take energy efficiency, demand response and interconnections into account in their resource adequacy assessments and ten-year network development plans.

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)

Overall adequacy of the electricity system to supply current and projected demands for electricity (Directive 2005/89). To support infrastructure planning by TSOs, MS must provide sufficient national level projections for renewables, and specific information on how they intend to increase system flexibility and integration of renewables:

- removing excess and inflexible capacity
- optimising grid use and implementation of the efficiency first principle in grid investments
- improving locational price signals
- use of smart meters
- interconnections
- reforms to peak pricing rules
- demand side management by electric vehicles
- the role of demand side participation and storage in price formation

Furthermore, MS need to plan for how they intend to support prosumers (participating in both demand side response and production of renewable energy) and how they will reduce associated barriers to market entry for new actors (eg aggregators, community energy initiatives).

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)

While the compliance with the planning obligations around energy efficiency and RES legislation may need the deployment of resources at the national level, it does not appear that those can be considered excessive, or unnecessary, if compared to benefits. This is confirmed by different studies. E.g. the April 2015 mid-term evaluation of RES-D performed in the context of the REFIT programme concluded that the overall administrative burden and costs of planning and reporting obligations are reasonable, compared to the benefits.

It is also important to note that the majority of bureaucracy comes from areas like taxation and customs, not environmental policies, which are responsible for less than 1% of red tape in the EU, as found in the opinion from 2009 by the High-Level Group on Administrative Burden (<http://www.eeb.org/index.cfm/news-events/news/commission-plans-to-reduce-red-tape-cross-a-red-line-for-democracy-and-the-environment/>).

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 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"/>

<p>Effective and efficient implementation of EU legislation in the energy and climate field</p>					
<p>Assess progress to targets at Member State level and enable aggregation of data at EU level</p>					
<p>Better comparability of data from different Member States enabling an informed evaluation</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>EU as a whole and Member States themselves are better informed on the actual performance and it provides ground for further action</p>					

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

Reporting should allow policy makers and stakeholders to monitor the implementation of policies and measures and progress towards the fulfilment of targets in a way that allows for timely further action to be taken if necessary. Reporting templates should be mandatory and the information made publicly available. The more detailed the reporting, the easier it is to see where MS deviate from their planning. Reporting should identify the cause(s) of any MS underachievement. Based on MS reporting, the European Commission should suggest improvements to national plans, procedures, and institutional structures/capacities in order to enable their more effective delivery, taking into account EU legislation and international agreements. In line with the modular planning architecture suggested in article 3a, MS climate and energy reporting must also include an assessment of progress in developing and implementing international obligations and commitments, including low greenhouse gas emissions development strategies.

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)

- Timing of reporting obligations is inconsistent - the RED, EED, ESD and MMR (also the EEA and UNFCCC) all have different deadlines;
 - Not all plan templates are mandatory;
 - Not all targets are binding at national and/or EU level;
 - At EU level, different data/projections used for different assessments:
 - o the Commission's security of supply package from 16 February 2016 used a low 25% energy efficiency scenario for 2030 to assess Europe's gas import dependency and a higher 30% scenario for the heating and cooling strategy;
 - o Grid planning by the ENTSOs and for PCIs uses a different set of energy supply and demand scenarios, creating inconsistencies such that grid planning is not optimised for the energy transition and creating the risk of over-investment in gas infrastructure.
- Low carbon development strategies must be consistent with other long-term plans, especially international obligations to develop low greenhouse gas emission development strategies (PA, Art 4, 19)

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

See the response to question 3a

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)

MS reporting on national renewable energy shares, support schemes, simplified administrative procedures, and transmission and distribution reinforcements as per Article 22 (1 a, b, c, e, f) should be maintained to provide a holistic overview of national policies and ensure transparency for investors. Biennial reporting will allow the European Commission to monitor collective progress towards 2030 targets and have an early-warning system that can trigger corrective measures in the event of an MS underachieving.

The European Commission's monitoring and reporting obligations as per Article 23 should be maintained. The Commission should be able to intervene in the case of counter-productive or inadequate MS measures and to make official policy recommendations on national renewable energy policies.

The Commission should biannually report overall progress to Member States and the European Parliament as part of a reliable governance process and ensure transparency over collective progress.

15) Which elements/articles of the current reporting obligations in the field of energy efficiency do you consider indispensable and why? Please, if relevant, refer to specific articles of the Energy Efficiency Directive, the Energy Performance of Buildings Directive and the legislation on products. (up to 1000 characters)

See the response to question 5

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)

See the response to question 6

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)

See the response to question 7

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)

See the response to question 8

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)

See the response to question 9

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

Future obligations

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

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

D. Options for streamlining planning and reporting obligations

This part of the consultation seeks stakeholders' views on the options for the design of the planning and reporting obligations in the new governance system.

22) Do you agree that a comprehensive new legislative act covering both planning and reporting obligations of policy areas related to the Energy Union including the 2030 Energy and Climate framework would ensure consistency and reduce unnecessary administrative burden?

- YES
- NO
- No Opinion

23) Do you think that non-legislative approaches (e.g. guidance to Member States) can assure effective and efficient streamlining of planning and reporting obligations and would provide the necessary certainty for investors?

- YES
- NO
- No Opinion

24) Concerning options to streamline planning and reporting obligations in the framework of the governance of the Energy Union, how would "Non-binding guidance for both planning and reporting obligations covering all Energy Union dimensions" influence the following categories?

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

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

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

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

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

<p>Possibility to monitor the performance and trends (and put in place corrective measures if the results are lagging behind)</p>	<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 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"/>

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

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

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

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

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

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

A legislative act relating to EU climate and energy reporting for both the 2030 and 2050 time periods is the surest way to ensure effective development and implementation of the policies and measures needed to deliver adequate emissions reductions.

This act should enable integrated, modular national plans that are coherent and maximise synergies between time periods, sectors, targets and assumptions, and measures. These plans must give a clear overview of the direction that each MS is taking to fulfil its medium and long-term climate and energy targets. The EU and MS need to ensure coherence between the revision of the specific directives and P&R legal act, particularly if the timing of each process is different.

P&R obligations have to be regulated by legislation. Binding templates make planning and reporting easier, more transparent, and comparable. Therefore, the current system of sectoral legislation has to be improved to include binding templates for all energy-related files.

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 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)

See questions 4-8.

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)

See questions 14-19

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

31) What political process would be necessary to ensure the stability of the National Energy and Climate Plans (e.g. approval by national governments, cross-party approval, approval by national parliaments, or national legislative acts)? (up to 1000 characters)

Transparent and participatory planning must engage stakeholders (cities, municipalities, citizens) at an early stage to boost investor confidence, public acceptance, and the stability of plans. The plans should be debated in national democratic institutions, between all relevant stakeholders. National policymakers should input to plans, and be informed about them. Plans need to be anchored in official papers, whether or not that be legislation. Templates have to be binding and detailed, in line with the modular approach detailed in answer 3a.

A concrete timeline has to be provided for finalising the first plans well ahead of 2020. A regular update of plans has to be foreseen to take stock of progress, taking also into account the reporting cycles under the Paris agreement.

MS should report biennially to the EC, who then reports to the Council and EP. The EC must have oversight of national progress and ensure transparency and accountability the delivery of 2030 climate and energy targets.

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)

Plans should be updated in the event that MS and/or the EU as a whole are not in line with targets - bearing in mind that ambition can obviously only be revised upwards. The Commission should have a reinforced oversight over MS progress and the ability to make country-specific recommendations at every biennial reporting cycle in order to address challenges in meeting national objectives. The introduction of further measures, in case a gap towards achieving the 2030 targets is identified, needs to be foreseen. The plans should also be made more ambitious in the event of further global progress to tackle climate change (the submission of more ambitious NDCs by other countries), or the publication of further IPCC reports indicating that more climate and energy action is needed to tackle climate change.

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

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

	Very relevant	Relevant	Less relevant	Not relevant	No opinion
European Commission	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
European Parliament	<input checked="" type="radio"/>	<input type="radio"/>	<input 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 checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Environment Council	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
National administration	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
National parliaments	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
National stakeholders	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Neighbouring or other group of Member States	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Regional fora	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

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

	Very relevant	Relevant	Less relevant	Not relevant	No opinion
Support to Member States in developing national plans, notably by providing templates and technical support and disseminating best practice	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Review national plans and analyse Member States' contributions	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Issue policy recommendations, notably in its annual State of the Energy Union	<input 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 checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The national plans should describe how they reflect regional integration and cooperation on the Energy Union domains.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Member States should consult relevant other Member States on national plans before their submission.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The plans should provide clear account of these consultations and how they are incorporated in the plans.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The Commission should guide the process, and develop appropriate fora for consultations of draft plans and regional cooperation where required.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

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

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