

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

Fields marked with * are mandatory.

What this consultation is about

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

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

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

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

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

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

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

The questionnaire is structured as follows:

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

Questions marked with an asterisk (*) are mandatory.

*

A. Respondent's profile

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

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

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

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

A.2 Please specify your main field of activity.

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

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

Other - please specify:

*

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

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

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

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

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

Other/international - please specify:

*

A.4 Name and contact details

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

[Questionnaire ends here]

Name:

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

*

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

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

B. Evaluation of planning obligations

Existing obligations

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

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

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

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

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

Planning obligations at EU level should also pay attention to stakeholders' views and involvement and should be transparent throughout the process of their preparation.

Streamlining reporting could be a good thing once it triggers better implementation of planned measures and policies. In order to ensure this, good EU legislation is needed, legislation that above all else gives a clear sense of direction for MS to follow.

To take the example of buildings, we note that without a solid nZEB ambition for the entire building stock by 2050, Member States plans will not be complete and coherent as their sense of purpose is hindered by the lack of a 2050 vision. Following the planning obligations, the key element for reporting requirements must be to describe the real impact on the ground and to set out new measures that allow for the achievement of the long term vision

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 among existing planning obligations, if well-coordinated, do not represent a major problem. We consider that better coordination is the solution regarding energy efficiency planning obligations, such as the Energy Efficiency Directive (notably its Articles 4 and 5) and the Energy Performance of Buildings Directive (notably its Articles 5 and 9). There are inconsistencies at an overarching level that need to be corrected. The European Commission, in light of trends on end-use energy consumption and in light of our climate goals, needs to align the demand projections used for different pieces of legislation in the energy & climate policy, and consistently apply the Energy Efficiency First principle. This has not been the case in the latest policy package, the Security of Supply package, published in February 2016. Alignment of demand projections and application of the Energy Efficiency First principle should be used at EU level, but also in the National Energy & Climate Plans

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

Some current planning obligations in the field of energy efficiency in buildings could be streamlined into one integrated plan, whose objective should be to reach a nZEB-level building stock at EU level by 2050. This integrated plan should be binding and included in existing EU legislation, covering provisions currently in EPBD Articles 5 & 9, as well as in EED Articles 4, 5 & 14. The Commission should provide the Member States with a binding template, should monitor these plans and be able to provide feedback and recommendations to improve next versions. This action by the Commission is essential to support the transformation of the building stock into nZEB level by 2050; and more detailed planning would also facilitate integration of policy measures at “trigger points” e.g. to maximise energy improvements at the time when other changes occur in the buildings (cf BPiE report Best Practice in renovation)

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

The suggested integrated plan in Q3A to achieve a nZEB-level building stock at EU level by 2050 should be kept separate from other planning obligations, e.g. the NEEAPs in accordance with the EED. This separation is needed in order to ensure that the buildings sector, as the sector that provides the most readily available opportunity for achieving EE objectives, is given the prominence it deserves. However, there should be a strong coordination between planning obligations for energy efficiency in buildings on one side, and planning obligations for other energy efficiency provisions on the other side, as all these aspects are interrelated. It is also important to keep a separation between planning obligations related to the energy efficiency policy and planning obligations related to the renewable energy policy, although some coordination is needed. As a matter of fact, decarbonising the building stock will require high ambition on both sides, EE and RES. The specific challenge of boosting energy efficiency to the needed scale requires a strong plan that is focussed enough to overcome the specific barriers to increased action on EE, among which complexity, size of projects, etc. Therefore, energy efficiency legislation cannot be considered as the right tool to include provisions on renewable energy, although lowering the energy demand, especially stemming from the buildings sector, is the best basis to start an effective energy transition towards a decarbonised energy system

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

In the energy efficiency policy, there is no planning obligation that seems unnecessary and which should be repealed. Therefore, in the future, all planning obligations should be binding, integrated in EU legislation, based on existing requirements, and take into account the results of an ambitious revision of the EED and EPBD

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

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

5) Which elements/articles of the current planning obligations in the field of energy efficiency do you consider indispensable and why? Please, if relevant, refer to specific Articles of the [Energy Efficiency Directive](#) and [Energy Performance of Buildings Directive](#). (up to 1000 characters)

All current planning obligations in the field of energy efficiency are indispensable. Adopting a long-term perspective at EU and national level gives the regulatory stability that is needed at investor, company and citizen level in order to take action. Moreover, current planning obligations are needed for the European Commission to structure its monitoring of progress at national level, and start infringements if necessary. All this is the best way to ensure that policy is implemented, energy savings and all related benefits delivered. More specifically, current planning obligations in the field of energy efficiency which are indispensable are the Articles 4, 5, 14 and 24§2 of the EED, and the Articles 5 and 9 of the EPBD

6) Which elements/articles of the current planning in the field of low-carbon development strategies do you consider indispensable and why? (up to 1000 characters)

7) Which elements/articles of the current planning obligations in the field of infrastructure development (like for example TEN-E) do you consider indispensable and why? (up to 1000 characters)

Investing in EE constitutes an infrastructure priority, as demonstrated by the recent inclusion, by the UK government, of EE policies and measures in its National Infrastructure Delivery Plan. Defining EE as an infrastructure transforms how EE investments are treated from an economic appraisal, accounting and state aid perspective, creating level playing field with other societal investments, like roads and schools. Therefore this element (buildings) should be included in reporting on infrastructure investment 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)

Other planning obligations in the field of energy that are indispensable, but are not yet integrated into EU and national energy planning, include how the Energy Efficiency First principle shall be applied, especially when it comes to modelling and demand projections. This integration of the EE First principle should be aligned between different pieces of energy legislation as we note that it has not been the case in the latest policy package in the energy field, i.e. the Security of Supply Package in February 2016. We note that some energy consumption scenarios do not take into account the trends towards a reduction of demand and a reduction of energy use. It is essential that they do so if we are to avoid the undesirable result of creating stranded assets in our energy system. We recall that the IEA has rightly pointed out that EE is our first source of energy and that the Commission believes it should be treated as an energy source in its own right

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)

When discussing the question of administrative burden on Member States and other stakeholders resulting from planning obligations at EU level, one should bear in mind that using standardised and mandatory templates would greatly contribute to the simplification of energy planning. It would be particularly helpful, for example, in relation to the reporting required under Art. 4 of the EED on renovation strategies for the building stock. The value of such a methodology has already been recognised in the energy field, as in the European Commission “Renewable Energy Progress Report” – COM(2015)293 final, which states that “certain provisions of the Directive were found to have contributed to reducing the administrative burden on Member States, such as the use of templates for planning and reporting requirements provided by the Directive” (page 13). All in all, planning at EU level, as well as coordination of national planning, is key in the energy and climate policy

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 type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Internal Energy Market	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Energy infrastructure	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Energy efficiency	<input checked="" type="radio"/>	<input 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"/>

C. Evaluation of reporting obligations


























Existing obligations

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

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

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

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

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

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

Reporting obligations at EU level should also pay attention to the transparency of the implementation process. Involving stakeholders, for example, would allow to get a better tracking, at national level, of implementation of EU legislation, and with good information sharing, to better enforcement from the European Commission side. Also, better comparability of data should be based on the use of key indicators shared at EU and national level. For example, this should be done in the framework of the Buildings Observatory currently being developed by the European Commission for the energy efficiency in buildings policy

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)

Overlaps among existing reporting obligations must be well coordinated so as to ensure that they do not present a major problem to Member States. Therefore, better coordination is the solution regarding EE reporting obligations, such as between the EED (notably Arts 4, 5 & 14) and the EPBD (notably Arts 5 & 9), on the Member State side, and between the EED (notably Arts 5 & 6) and the EPBD (notably Arts 5 & 9), for the Commission. Besides, reporting obligations related to overall progress (i.e. EED Arts 3 & 24) should be better coordinated with the reporting obligations stemming from the EPBD. Regarding quality of reporting, what matters is progress on implementing measures on the ground, delivering energy savings and benefits to business and consumers. The impact of implementation measures should be included in reports. Reporting obligations should not be considered as fulfilled if the paperwork has been done in a 'tick-the-box' exercise, as was the case with EED Art 4 in March 2016

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

Some current reporting obligations in the field of energy efficiency in buildings could be streamlined into one integrated report, i.e. monitoring both at Member State and EU level, progress made on reaching an nZEB-level building stock at EU level by 2050. This integrated report should be binding and included in existing EU legislation, covering provisions currently in EPBD Articles 5 & 9, as well as in EED Articles 4 & 5. The Commission should provide the Member States with a binding template for this report, should monitor this reporting exercise and be able to provide feedback and recommendations to improve next versions

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

The suggested integrated report in Q13A on progress towards an nZEB-level building stock at EU level by 2050 should be kept separate from other reporting obligations, e.g. the NEEAPs in accordance with the EED. However, there should be a strong coordination between specific reporting obligations for energy efficiency in buildings on one side, and reporting obligations for other energy efficiency provisions on the other side, as all these aspects are interrelated. It is also important to keep a separation between reporting obligations related to the energy efficiency policy and reporting obligations related to renewable energy policy, although some coordination is needed. As a matter of fact, the energy efficiency legislation cannot be considered as the right tool to include provisions on renewable energy, although lowering the energy demand, especially stemming from the buildings sector, is the best basis to start an effective energy transition towards a decarbonised energy system

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

In EE policy, there are no reporting obligations that seem unnecessary and which should be repealed. However, reporting obligations under Art 4 EED should be strengthened to require a roadmap on the achievement of an nZEB level building stock by 2030 and 2050. In addition, a number of inconsistencies, starting with definitions of deep renovation / major renovation etc. should be addressed. We note that judging the quality of progress is being made difficult and Member States find it hard to make coherent reports in the absence of a clear vision for the building stock for 2050. Therefore, in the future, all reporting obligations should be binding, integrated in EU legislation, based on existing requirements, and take into account the results of an ambitious revision of the EED and EPBD. Reporting should also be based on regular cycles, e.g. every three years and include information on the impact of implementation on the ground. The term “regular” should be defined in EU legislation, in order to simplify the Member States and the Commission collaboration

[*] 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)

All current reporting obligations in the field of energy efficiency are indispensable. Reporting obligations, associated with the use of commonly agreed key indicators, are needed for the European Commission to structure its monitoring of progress at national level, and start infringements if necessary. All this is the best way to ensure that policy is implemented, energy savings and all related benefits delivered. More specifically, current reporting obligations in the field of EE which are indispensable are the Arts 4, 5, 6; 14, 19(2) & 24§2 of the EED, and the Arts 5 & 9 of the EPBD. For article 4 EED, MS should give more focus to long term planning, intervention scenarios, integration of multiple benefits, forward-looking measures, and measures to boost staged deep energy renovation. Sunset clauses, if used at all, should be set at a true long-term horizon, such as 2050

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)

Other reporting obligations in the field of energy are indispensable, but are not yet integrated into EU and national energy planning. In fact, the EE First principle should be applied, especially when it comes to modelling and demand projections. This integration of the EE First principle should be aligned between different pieces of energy legislation as we note that it has not been the case in the latest policy package in the energy field, i.e. the Security of Supply Package in February 2016. However, using the same demand projections at EU and Member State level, in accordance with the EE First principle, would make reporting easier for Member States, and monitoring easier for the European Commission

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)

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

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

When discussing the question of administrative burden on Member States and other stakeholders resulting from reporting obligations at EU level, one should bear in mind that using standardised and mandatory templates would greatly contribute to the simplification of energy reporting. The value of such a methodology has already been recognised in the energy field, as in the European Commission “Renewable Energy Progress Report” – COM(2015)293 final, which states that “certain provisions of the Directive were found to have contributed to reducing the administrative burden on Member States, such as the use of templates for planning and reporting requirements provided by the Directive” (page 13). All in all, reporting at EU level, as well as coordination of national reporting, is key in the energy and climate policy

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


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

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













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











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













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

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

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

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

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

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

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)

Effective planning and reporting obligations in the energy field are a tool to achieve a goal, i.e. delivering a secure, sustainable and competitive energy system to European businesses and consumers. EuroACE believes that planning and reporting obligations could be streamlined and integrated, but only on the condition that the actual requirements are not watered down in the process. The challenges and solutions posed by each end-use sector are better understood than 10 years ago. In the case of EE in buildings, where the challenge lies in the complexity of aligning policy, incentives, information and leadership, the sectoral reporting is particularly relevant. Improving it would accelerate the visibility of policies, and the signal that solid energy renovation strategies could provide to investors, industry, consumers etc.

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

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)

Some current planning obligations in the field of energy efficiency in buildings could be streamlined into one integrated plan, whose objective should be to reach a nZEB-level building stock at EU level by 2050. This integrated plan should be binding and included in existing EU legislation, covering provisions currently in EPBD Article 5 & 9, as well as in EED Article 4 & 5. The Commission should provide the Member States with a binding template, should monitor these plans and be able to provide feedback and recommendations to improve next versions. This suggested integrated plan to achieve a nZEB-level building stock at EU level by 2050 should be kept separate from other planning obligations, e.g. the NEEAPs in accordance with the EED. However, there should be a strong coordination between planning obligations for energy efficiency in buildings on one side, and planning obligations for other energy efficiency provisions on the other side, as all these aspects are interrelated. It is also important to keep a separation between planning obligations related to the energy efficiency policy and planning obligations related to the renewable energy policy, although some coordination is needed

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)

Some current reporting obligations in the field of energy efficiency in buildings could be streamlined into one integrated report, i.e. monitoring both at Member State and EU level, progress made on reaching an nZEB-level building stock at EU level by 2050. This integrated report should be binding and included in existing EU legislation, covering provisions currently in EPBD Article 5 & 9, as well as in EED Article 4 & 5. The Commission should provide the Member States with a binding template for this report, should monitor this reporting exercise and be able to provide feedback and recommendations to improve next versions. This suggested integrated report on progress towards an nZEB-level building stock at EU level by 2050 should be kept separate from other reporting obligations, e.g. the NEEAPs in accordance with the EED. However, there should be a strong coordination between reporting obligations for energy efficiency in buildings on one side, and reporting obligations for other energy efficiency provisions on the other side, as all these aspects are interrelated. It is also important to keep a separation between reporting obligations related to the energy efficiency policy and reporting obligations related to the renewable energy policy, although some coordination is needed

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

The suggested integrated plan in Q3A to achieve a nZEB-level building stock at EU level by 2050 should be kept separate from other planning obligations, e.g. the NEEAPs in accordance with the EED. This separation is needed in order to ensure that the buildings sector, as the sector that provides the most readily available opportunity for achieving EE objectives, is given the prominence it deserves. However, there should be a strong coordination between planning obligations for energy efficiency in buildings on one side, and planning obligations for other energy efficiency provisions on the other side, as all these aspects are interrelated. It is also important to keep a separation between planning obligations related to the energy efficiency policy and planning obligations related to the renewable energy policy, although some coordination is needed. As a matter of fact, decarbonising the building stock will require high ambition on both sides, EE and RES. The specific challenge of boosting energy efficiency to the needed scale requires a strong plan that is focussed enough to overcome the specific barriers to increased action on EE, among which complexity, size of projects, etc. Therefore, energy efficiency legislation cannot be considered as the right tool to include provisions on renewable energy, although lowering the energy demand, especially stemming from the buildings sector, is the best basis to start an effective energy transition towards a decarbonised energy system

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)

In order to ensure the stability of planning & reporting requirements, it would be necessary to build on a strong stakeholder involvement process, as this would increase the quality, the support and the ownership of the Plans, and therefore their timely and effective implementation. A good collaboration between national authorities and the Commission should also be put in place, with an overview role for the European Parliament. Further details of the political process should be left up to the Member States to decide, in accordance with the subsidiarity principle, but in any case, the process should be transparent. Finally, there should be a legal mechanism that ensures that both Member States and the European Commission are accountable

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)

Several factors justify an update of planning & reporting requirements. First, these Plans should be set in coherence with international agreements, such as the Paris Agreement following the COP21, setting the decarbonisation path at a 1.5°C limit. Second, planning & reporting requirements should be updated in accordance with the latest EU legislation agreed through co-decision. Third, planning & reporting requirements should include provisions allowing the Commission to develop corrective mechanisms if it notices, after monitoring, that progress on current targets and measures is not quick and good enough. Finally, for buildings, the reporting should enable to capture the evolution in the integration of multiple benefits and progress on financing schemes. Ultimately good reporting is also a means for MS to better understand the links between the various leveraging policies for EE. It can be a good support to foster better uptake of energy efficiency on the ground

E.2 Role of different institutions in the governance process

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

	Very relevant	Relevant	Less relevant	Not relevant	No opinion
European Commission	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
European Parliament	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
European Council	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" 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 type="radio"/>	<input checked="" 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 type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Environment Council	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
National administration	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
National parliaments	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
National stakeholders	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Neighbouring or other group of Member States	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Regional fora	<input type="radio"/>	<input 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 checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Approve national plans	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Propose measures on EU level in view of delivering on the objectives of the Energy Union	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

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

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

	Very important	Important	Less important	Not important	No opinion
As part of their national integrated plans Member States should jointly develop regional objectives, standards and common coherent strategies on the relevant dimensions of the Energy Union.	<input type="radio"/>	<input type="radio"/>	<input 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 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 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 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 type="radio"/>	<input type="radio"/>	<input type="radio"/>

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

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

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