

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

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

The Commission's Energy Union Strategy states that Europe has to "move away from an economy driven by fossil fuels, an economy where energy is based on a centralised, supply-side approach and which relies on old technologies and outdated business models." This fundamental shift in the European energy system needs a strong policy framework firmly established in EU legislation.

The Energy Union has citizens at its core. This goes beyond offering passive consumers more affordable energy. The Energy Union must encourage citizens to take ownership of the energy transition and participate actively in energy markets; it must empower consumers, in particular the most vulnerable, and protect them.

Therefore, Energy Union governance should oblige Member States to plan and report on specific targets and measures to promote the growth of prosumers. Greenpeace defines prosumers as active energy consumers, such as individuals, non-commercial organisations, public entities and small enterprises that participate in the energy market by producing renewable energy either individually or collectively through organisations, such as cooperatives or associations.

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)

Energy Union governance presents an opportunity to address the inconsistencies between planning towards the Energy Union's multiple objectives. Many European energy planning obligations are misaligned with medium and long-term EU climate objectives and synergies between energy and climate plans are often missing.

For example the significant oversupply of inflexible, baseload generation in most regions can undermine renewable energy deployment and efforts to improve energy efficiency. Member States should be obliged to plan to phase out excess inflexible capacity. Similarly Member States often ignore the energy security benefits of renewable energy and energy efficiency in security of supply planning.

Member States (and the Commission) should be obliged to use consistent demand projections in line with Europe's medium and long-term energy efficiency targets.

Fossil fuel subsidies are costly, crowd out renewable energy and energy efficiency investments, artificially inflate fossil fuel consumption and increase carbon emissions. Member States should be obliged to report all direct and indirect fossil fuel subsidies as part of their national 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)

Any streamlining of planning obligations should respond to the October 2014 European Council Conclusions that stated that post-2020 governance should be reliable, transparent and predictable, and should "build on the existing building blocks" i.e. national climate, renewable energy and energy efficiency plans.

Streamlining efforts should focus on highlighting the synergies between the three climate and energy targets and other objectives, such as the contribution of renewable energy and energy efficiency to reducing greenhouse gas emissions and improving energy security. A revised planning process should enhance acceptance and transparency of the renewable energy sector in Member States, particularly by ensuring stakeholder consultation in the process of drafting national plans.

Streamlined planning should allow the Commission to monitor and compare Member State information more efficiently and effectively. The European Commission should provide a detailed, binding template for NREAPS and NEEAPS under the 2030 climate and energy framework.

These plans should be enshrined in the revised Renewable Energy Directive and Energy Efficiency Directive respectively and not be decoupled from their main primary legislation. This is even more important in the absence of binding national targets, which should remain the preferred option.

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

The merits of a fully integrated plan are limited and risk being outweighed by the creation of an unwieldy and thus unpractical plan, or a plan that lacks

the necessary detail. Instead, the synergies between each area of planning, including NREAPS and NEEAPS, should be explained.

Furthermore, given the high level nature of the EU's 2030 climate and energy targets, Member States should be required to provide plans with detailed measures on how they will meet each of these targets.

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

No.

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

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

The preliminary findings of the RES Directive REFIT evaluation are that binding national targets, NREAPS with sectoral trajectories and an overall trajectory towards a binding national share for 2020 have been “particularly effective for transparency for investors and other economic operators, and the quality of information on renewable energy markets and policies in the Member States”.

The review also found that the standardisation of NREAPS helped increase the transparency of renewable energy policies across Europe. The Commission should improve this by providing a detailed, binding template for NREAPS as part of the 2030 RES Directive.

In response to the review, future plans should provide more detailed and consistent targets, policies and measures for prosumers, including fair access to the market, measures for low-income communities, encouraging appropriate business models and the simplification of administrative procedures. It should also include policies and measures for the heating and cooling sectors, streamlining of authorisation and permitting procedures; transmission and distribution grid connections, operation and development.

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 provisions in the EED and EPBD are important. The EPBD only has one main planning obligation, which is to draw up a national plan to increase the number of nearly zero-energy buildings (Article 9). This obligation should

be maintained and standardised through a binding template, not least as Ecofys finds significant variations in elements as basic as the definition of a near zero-energy building
(<https://ec.europa.eu/energy/sites/ener/files/documents/Updated%20progress%20report%20NZEB.pdf>).

The planning obligations for the implementation of Articles 5 and 7 of the EED are important and should be standardised through a binding template and standardised definitions, including an obligation to plan how individual Member States will contribute to the EU-wide target. This would help address findings of the Coalition for Energy Savings
(http://energycoalition.eu/sites/default/files/20150316_Coalition-for-Energy-Savings_Updated_Art._7_report.pdf) that NEEAPs were difficult to compare and often of poor quality.

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)

In Paris, the EU and its Member States committed to developing long-term low-carbon development strategies. In the context of the goal of keeping global temperature increase below 1.5 °C, it is clear that the EU and its members must speed up decarbonisation efforts, dramatically cut energy demand and accelerate the deployment of renewable energy.

The European Commission should strengthen the obligations to develop long-term low-carbon development strategies under the Mechanism for Monitoring and Reporting Greenhouse Gas Emissions Regulation, bringing it into line with the Paris goal. It should also update its 2050 low-carbon and energy roadmaps to reflect the higher ambition agreed in Paris.

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)

Current grid planning obligations are inadequate as evidenced by the misalignment of current plans with Europe's medium and long-term climate and energy objectives. ENTSO-E's TYNDP is analysed on the basis of 4 scenarios but only 2 assume timely delivery of the Energy Roadmap 2050. Conservative assumptions lead to plans that are inadequate for supporting higher shares of renewables and prosumers. They result in higher system costs, contribute to generation overcapacity and waste public funding. See Greenpeace's Pow[ER]2030 report:
<http://www.greenpeace.de/files/publications/201402-power-grid-report.pdf>.

Investments in distribution networks will be very important as more prosumers become established. All DSOs should be obliged to develop long-term network plans in line with Europe's medium and long-term climate and energy objectives.

The gas and electricity TYNDPs and TSOs' 10-year plans should move beyond a national focus on grid planning, assume realistic demand projections and deliver EU climate and renewable targets aimed ultimately at a gas phase-out. This should also apply to the selection process of PCIs, the SOAF and the network codes.

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)

In the context of the security of supply regulations and infrastructure plans, the European Commission, should revise resource adequacy assessments and associated planning requirements to fully consider all system resources, including energy efficiency, demand response and interconnection, alongside generation resources. These assessments would then provide the proper analysis for Member states to plan the phase out of excess baseload generation, including coal, nuclear and gas plants.

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)

In the case of renewable planning, the mid-term review of the Renewable Energy Directive by CE Delft found that the administrative burden of the obligation to produce NREAPS was limited given that Member States would have to develop plans regardless of an EU obligation to submit these plans. The review also notes that there is no indication that the obligation under Article 4 is "inappropriately high", compared to the benefits.

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

Assess progress to targets at Member State level and enable aggregation of data at EU level					
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)

Greenpeace considers robust and transparent reporting by Member States a prerequisite to monitoring the implementation and effectiveness of policies and measures, as well as overall progress towards the achievement of the 2020 targets. Consistent reporting enables the legislator to identify and address barriers and deficiencies in a timely fashion (whether these occur as a result of interpretation or implementation of the rules) and enables stakeholders, like Greenpeace, to analyse progress and function as watchdogs. It also allows citizens to hold their representatives and industries to account.

The Commission should provide mandatory reporting templates to ensure that the necessary information is presented in a consistent/comparable way across Member States. There should be a single point of public access for all reports, e.g. through transparency platform/clearing-house mechanism.

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)

Efforts to align reporting obligations may be counter-productive, as an effective staggering of reporting can reduce the load on national administrations and stakeholders.

Member States are obliged to provide annual reports on key measures under the

EED. The same interval should apply to reporting under the Renewable Energy Directive, although this can still be staggered.

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

Any efforts to streamline reporting obligations should respond to the October 2014 European Council Conclusions that stated that post-2020 governance should be reliable, transparent and predictable and should “build on the existing building blocks” i.e. national climate, renewable energy and energy efficiency progress reports.

Detailed, specific and transparent Member State reporting must facilitate a regular review of progress towards the EU’s 2030 climate and energy targets. It also facilitates the role of the European Commission, the European Parliament and other stakeholders to assess the causes of any delays and deficiencies in implementation with a view to providing targeted policy recommendations.

Reporting should provide consistent, coherent information that allows the Commission to monitor and compare Member State information more efficiently and effectively. The European Commission should provide a detailed, binding reporting template for Member State under the 2030 climate and energy framework, enshrined in the revised Renewable Energy Directive and Energy Efficiency Directive respectively.

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

The merits of a fully integrated report are limited and risk being outweighed by the creation of an unwieldy and thus unpractical report, or a report that lacks the necessary detail. Instead, the synergies between each area of planning, including NREAPS and NEEAPS, should be explained.

Furthermore, given the high level nature of the EU’s 2030 climate and energy targets, Member States should be required to provide detailed reports in relation to achieving these targets.

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

No.

[*] 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)

Reporting obligations under the RES Directive should be maintained and strengthened. Member States should be obliged to submit annual reports instead of biennial progress reports, as is the case under the EED. The CE Delft mid-term review of the RES Directive notes that biennial reporting in part addresses the gap created by the fact that NREAPs quickly become out of date. The introduction of annual reporting by Member States would further reduce this gap.

Member States should continue to report on key elements of national plans, such as the rising number of prosumers, national renewable energy shares, support schemes, progress in addressing administrative barriers, transmission and distribution reinforcements and the sustainability of biofuels and biomass.

The CE Delft report found that the Member States' progress reports underpinned the Commission's understanding of domestic and overall progress towards the targets, and therefore enabled them to provide targeted feedback to Member States. The Commission should continue to monitor and provide annual reports and official policy recommendations to Member States and the European Parliament.

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)

Current reporting obligations under the EED and EPBD are indispensable, including reporting progress on Article 5 and 7. The lack of progress towards the EU's 2020 energy efficiency target is and will be evident as a result of Member State and Commission reporting obligations under Article 3(3)a. However, Member States must continue to report annually on their progress towards their national energy efficiency targets (Article 24(1)).

Annual reports allow the Commission to analyse and report on progress and issue timely country-specific recommendations to the European Parliament and the Council (Article 24(3)).

Reporting on the EPBD's objective to increase the number of nearly zero-energy buildings (Article 9) has already been streamlined to allow Member States to report progress in the context of their NEEAP (Article 5). However, the maximum interval for reporting should be shortened to no more than 3 years, to bring it in line with the Commission's progress reporting obligations under

the Directive.

The European Commission should provide a mandatory, standardised template for all reporting obligations.

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)

In Paris, the EU and its Member States committed to developing long-term low-carbon development strategies. In the context of the goal of keeping global temperature increase below 1.5 °C, it is clear that the EU and its member must speed up decarbonisation efforts, dramatically cut energy demand and accelerate the deployment of renewable energy.

The European Commission should strengthen the obligations to report long-term low-carbon development strategies under Article 4 and 13 of the Mechanism for Monitoring and Reporting Greenhouse Gas Emissions Regulation. The reference in Article 13b “updates relevant to their low-carbon development strategies referred to in Article 4 and progress in implementing those strategies” is too vague and should be revised to require Member States to report on their low-carbon development strategies at a regular interval.

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)

ENTSO-E should continue to publish a monitoring report in every alternate year of the TYNDP.

Reporting obligations under the TEN-E Regulation should continue, in particular the requirement for project promoters to submit annual reports, which provide the means to identify problems with the development of the project in a timely manner. The annual reports also enable the European Commission to identify and address any common challenges experienced by the projects.

Investments in distribution networks will become increasingly important as more prosumers are established. All DSOs should be obliged to forecast and develop long-term network plans and to report on these plans annually or biannually.

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)

No opinion.

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)

While patent tracking is important, energy RandI reporting on levels of investment by the public and private sector are indispensable and should be the main focus. Public sector investment is particularly important due to its use by the IEA and as a criterion for membership of the Mission Innovation club launched during COP21. However, the reporting should be extended to also track additional indicators, such as those in the following report (<https://www.era-learn.eu/publications/ec-publications/evaluation-of-joint-programming-to-address-grand-societal-challenges-final-report-of-the-expert-group>). .

Likewise, the Commission should also improve its tracking of the spending of ETS revenues on climate-friendly projects, including RandI, as well as spending under the European Structural and Investment Funds (ESIF) to ensure that Energy Union spending is appropriately targeted.

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)

In the case of renewable planning, the mid-term review of the Renewable Energy Directive by CE Delft found that the administrative burden of the obligation of biennial reporting did increase administrative costs, but that the use of standardised template would reduce this burden.

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 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"/>

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"/>
Achievement of the EU energy and climate objectives	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Possibility to monitor the performance and trends (and put in place						






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

to provide substantial and useful advice and ensure uniform application of EU legislation						
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25) Concerning options to streamline planning and reporting obligations in the framework of the governance of the Energy Union, how would "Regulating planning and reporting obligations in sectorial legislation as currently the case" influence the following categories?



















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







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

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

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

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

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

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

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

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

Specific planning obligations in sectorial legislation has helped to secure a minimum standard across national plans to achieve the 2020 climate and energy targets. It has also introduced a focus on achieving high-level policies, i.e. the 2030 climate and energy targets, which risks being diluted if replaced by an all-encompassing mechanism that covers the Energy Union's many policy objectives.

Instead, synergies should be identified between policies areas, and Member States should be obliged to use the same scenarios and assumptions for each plan, thus maximising the coherence across sectoral plans. Moreover, mandatory, standardised templates should be introduced to raise the quality and consistency of plans and reports.

Greenpeace is of the view that a reliance on non-binding guidance would result in the significant further deterioration of the quality and effectiveness of national plans and reports. This would seriously hamper investor certainty and undermine the ability of the Member State to achieve its share of the 2030 climate and energy targets. Greenpeace therefore opposes this option.

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 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 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 answers 2 - 10.

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 answers 11 - 20.

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

See answer 3b.

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)

National representatives of citizens, cities and municipalities, alongside NGOs and other stakeholders should be able to participate in the decision-making that results in national energy and climate plans, including their relevant sections on renewable energy, energy efficiency and climate action. This will increase national buy-in, public acceptance and legitimacy of the plans.

Likewise, the transparency of planning and reporting is essential in promoting a participatory approach, which is why Greenpeace calls for the introduction of mandatory templates.

Regardless of the national options for endorsement, it is important that the European Commission and the European Parliament retain their role in providing oversight. In particular, they must ensure Member States deliver effective plans, meet their reporting obligations, and that they deliver on the EU's 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)

A Member State should be obliged to update sections of its national energy and climate plan (e.g. its NREAP) in the event of any significant deviation in policy, projections and if it is established that the EU is not on track to meet its minimum 2030 climate and energy targets. The CE Delft mid-term review of the Renewable Energy Directive found that there is a risk that NREAPs become outdated as policies and circumstances change. Maintaining obsolete plans undermine the reliability and transparency of future planning for investors and other stakeholders.

Moreover, the EU agreed to pursue efforts to limit global warming to 1.5°C as part of the Paris Agreement and is thus required to increase the ambition of its 2030 climate and energy targets, by 2020 at the latest. Consequently, Member State must also update their national energy and climate plans to reflect the higher EU 2030 ambition.

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 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"/>

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 checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
National stakeholders	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Neighbouring or other group of Member States	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Regional fora	<input type="radio"/>	<input 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 type="radio"/>	<input checked="" 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 checked="" 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 checked="" 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 checked="" 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 checked="" 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 checked="" 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 checked="" type="radio"/>	<input type="radio"/>
Mutual reviews should be done on draft plans	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Mutual reviews should be also used for progress reports assessing the implementation of plans	<input type="radio"/>	<input 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 checked="" type="radio"/>	<input type="radio"/>
Mutual reviews should be mandatory for Member States	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

A dedicated system of mutual reviews should be established including the creation of adequate fora					
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Thank you for your participation!

Contact

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