

## FREQUENTLY ASKED QUESTIONS ON THE TEMPLATE FOR NATIONAL RENEWABLE ENERGY ACTION PLANS

### General questions

#### **Ø Do the sectoral targets have to add up to reach the national binding target?**

The sectoral targets have to be consistent with the national binding target set by Annex I A of Directive 2009/28/EC. They have to also be consistent with the minimum trajectory set by Annex I B. Moreover there is a minimum 10% requirement for renewable energy sources by 2020 in the transport sector.

#### **Ø In addition to the provisions of article 4.4, how can modifications of the NREAP be made after the notification of the NREAP by the Member State in June 2010?**

The Directive does not provide for modifying/up-dating the NREAPs, except under the precise circumstances described in Article 4(4). That is because the NREAPs are meant to provide renewable energy policy stability. Therefore credibility and reliability are of outstanding importance and modifications should generally be avoided. However situations may arise where adjustments could be necessary.

Any amended NREAP will need, like the original NREAP, to be submitted to the Commission and will, like the original NREAP, be subject to evaluation and possible action (including the initiation of infringement proceedings) by the Commission.

#### **Ø Can other units be used than those indicated in the template?**

No, the indicated units should be used. If national statistics use other units, uniform conversion factors should be applied. For example, the unit 'toe' has been used in international energy statistics (Eurostat, IEA) for several decades. The reference for the use of 'toe' can be found in Eurostat and IEA energy statistics publications (1 ktoe = 41,87 TJ).

## Questions on concrete points of the Template

### Overall targets and calculations:

- Ø **What is requested under point 5.2 (total contribution of energy efficiency and energy saving measures)?**

The template reflects the structure of Annex VI of Directive 2009/28/EC. This information has to be included when filling out table 1 in chapter 1. Therefore, at 5.2 nothing additional has to be included.

- Ø **If the national consumption forecast has been done taking into account energy efficiency measures up to 2008 can that be used instead of 2009?**

In Table 1 under the heading "reference scenario" a scenario has to be presented taking into account only the energy efficiency and savings measures adopted before 2009.

If scenarios only include energy efficiency measures up to 2008 (instead of 2009), please indicate this when presenting this Table.

- Ø **Which scenario of Table 1 has to be used to calculate the amount of energy used from renewable sources to meet the national overall RES target and trajectory?**

The calculation of the amount of renewable energy needed to meet the overall RES target and trajectory should be based on the levels of energy consumption that the Member State actually expects, given, inter alia, its compliance with EU energy efficiency legislation.

### Concerning support schemes:

- Ø **What kind of measures should be reported under Table 5 "Overview of all policies and measures"?**

This table offers a resume of all the policies and measures that are also described in more detail in chapter 4 of the NREAP. All measures, existing and planned, should be mentioned.

### Concerning heat pumps:

- Ø **How is the seasonal performance factor (SPF) used in Annex VII defined?**

In general terms the SPF is the average ratio between the heat output of the heat pump and the auxiliary energy input (in final energy terms, e.g. kWhs of electricity) used to run it. The Commission will establish guidelines on how to estimate SPF and  $Q_{usable}$  for the purpose of

the Directive but as these are not expected before the deadline for the NREAPs, Member States will have to use assumptions which have to be clearly defined and explained

- Ø **If there is only aggregated data available for geo- and hydrothermal heat pumps can it be presented in this aggregated form?**

For historical data (2005) there is very little to be done if geo- and hydrothermal were not reported separately. However for future years (from 2011 to 2020) estimations can be made. For these years separated data is expected.

- Ø **The NREAP has to contain detailed information on heat pumps. When will the Commission make the "•" factor, needed to calculate the energy from heat pumps on accordance to Annex VII of Directive 2009/28/EC, available?**

A methodology to calculate the "•" factor which is one of the parameters necessary for estimating the contribution of heat pumps was presented and discussed at the meeting of the Renewable Energy Statistics working group meeting hosted by Eurostat in Luxembourg on 23 October. This discussion revealed no major problems with the methodology proposed<sup>1</sup>, and the method proposed will thus be applied. It is to be noted that "•" develops over time and is likely to increase by 2020.

- Ø **Will there be a harmonised approach for the SPF (seasonal performance factor) in Annex VII?**

By 1 January 2013 the Commission is required to establish guidelines on how Member States are to estimate the value of SPF for the different technologies and applications. So there will be guidelines, but the value will be estimated by the Member States.

#### **Concerning hydro pumping and normalisation:**

- Ø **How can natural inflow in pumped-storage hydropower plants be taken into account in Table 10a/b? What does "of which pumping" in row five refer to?**

For Table 10 a) and b) the row "of which pumping" should contain electricity produced from pumped water only. (This is not counted as electricity from renewable energy sources.)

- Ø **How should natural inflow in pumped-storage hydropower plants be taken into account with regard to the total installed capacity?**

The question about how to deal with pumped storage capacity was also on the agenda of the Renewable Energy Statistics working group meeting hosted by Eurostat in Luxembourg on 23 October, where different options were discussed. At this meeting it was agreed that national statistical agencies would explore possible options further with hydropower experts and

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<sup>1</sup> See item 4.5 at

[http://circa.europa.eu/Public/irc/dsis/chpwwg/library?l=/renewable\\_statistics&vm=detailed&sb=Title](http://circa.europa.eu/Public/irc/dsis/chpwwg/library?l=/renewable_statistics&vm=detailed&sb=Title)

provide feedback to Eurostat by the end of 2009, after which conclusions should be drawn as to how to treat capacity of different types of hydro power installations.

**Ø How should climate change impacts (such as decreasing hydro power production) be reflected in hydro normalisation?**

The normalisation is not aiming to take out this effect from the calculation of the share of renewable energy consumption. If hydropower production is expected to fall due to decreasing precipitation, this should be reflected in the scenarios given to the extent possible.

**Concerning the transport target calculation:**

**Ø In chapter 3.2 how is the transport target calculated? What is included in the denominator?**

Article 3(4)(a) reads: "for the calculation of the denominator....petrol, diesel, biofuels consumed in road and rail transport, and electricity shall be taken into account". In other words, the following four items must be included:

- 1) Consumption of petrol for transport (all modes of transport, e.g. also aviation gasoline)
- 2) Consumption of diesel for transport (all modes of transport, e.g. also rail or inland waterways consumption OF diesel)
- 3) Biofuels used in road and rail transport
- 4) Electricity used in any mode of transport (e.g. including for pipeline transport).

LPG is NOT included in the denominator for the transport target, nor is aviation kerosene or any type of fuel used for international shipping.

**Ø For the calculation of the transport target in chapter 3.2, is the 2,5 factor for electricity from renewable energy sources applied both in the numerator and the denominator?**

Yes, the factor 2,5 should - as stated in the template – be applied for both the denominator and the numerator. Contrary to Article 3(4)(a) and 3(4)(b), Article 3(4)(c) applies to both the calculation of the numerator and the denominator (had the factor only applied to the numerator it would have appeared in point b).

**Ø Is footnote 17 in table 3 correct mentioning "electricity in land transport"?**

No, this is an error in the NREAP template. There is no qualification of the mention of "electricity" in the corresponding place in the Directive, and footnote 17 in the template should have read "electricity" without "in land transport". This means, of course, that e.g. consumption in electric trains, trams and metros are included.

### Concerning biofuels:

- Ø **In table 12 "bio-ETBE" covers the bio-ethanol part contained in ETBE or the total amounts of ETBE?**

"Bio-ETBE" covers the bio-ethanol part contained in ETBE.

- Ø **What is the purpose of question 4.2.10(e) on protected areas?**

The purpose of 4.2.10(e) is to ensure that non-national sources of protection have not been omitted related to the implementation of Article 17 (3) b.

### Concerning biomass:

- Ø **In 4.6.1 sentence 1 of paragraph 3 mentions wood chips, briquettes and pellets. The second sentence refers only to pellets. Is it correct?**

The other elements (chips and briquettes) should have also been mentioned, and should be included when elaborating on this point.

- Ø **In table 7 of chapter 4.6.1 where can biomass from landscape preservation areas be included?**

In table 7 these items can be listed under B.2 i)"other". If so, it should be specified, what is understood under this item.

- Ø **Do all Member States have to give detailed information on the transport sector (table 12, 4b) and bioenergy (table 7)?**

The tables referring to renewable energy in transport should be prepared by all Member States. These are not optional. If some resource is not relevant that can be indicated with a 0. Table 7 on biomass has certain optional parts which are not obligatory, however all Member States should report on the other parts.

- Ø **Hardly any reliable data can be produced on the import and export of biomass in Table 7 or Table 7a.**

Import and export of biomass should be estimated.

- Ø **The terminology of the heading of Tables 7 and 7a is confusing. What is the relation with the terminology in the energy Statistics Regulation?**

The headings in table 7 and 7a should be understood in line with the energy Statistics Regulation. (See page 43 of the following link:  
<http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2008:304:0001:0062:EN:PDF>)

So the table heading should be understood as follows:

Sector of origin		(Amount of domestic resource) Production (m3/ton)	Imported (m3/ton)	Exported (m3/ton)	Net amount Gross Consumption (m3/ton)	(Primary energy production ) Gross consumption (ktoe)
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- Ø **What is the right interpretation of table 7a? Is it the estimated domestic potential supply of biomass for energy purposes OR the estimated domestic supply of biomass for energy purposes?**

The correct understanding is the estimated domestic supply of biomass for energy purposes.

#### Concerning the buildings sector and district heating

- Ø **In chapter 4.2.3, should electricity from renewable energy sources be included, if it is used for heating and cooling purposes in the building?**

Under section 4.2.3 the renewable energy use in buildings is covered taking into account local / distributed production. If heat is generated through the use of electricity that is distributed through the grid (and not electricity produced and consumed in situ), the share of renewable energy sources used for that electricity should be not be reported under this section. The focus here is on locally produced and used electricity and heat from renewable energy sources.

- Ø **In the introduction of 4.2.3 the phrasing "The focus here is on increasing local supply of heat and / or electricity to individual buildings" does not make sense.**

This sentence should be understood as "... increasing the share of renewable energies in local supply...".

- Ø **Which part of the heat distributed in district heating/ cooling networks counts as renewable energy?**

Heat from non renewable energy sources that is distributed through a district heating network can not be counted as renewable energy. Only the part of heat production which is from renewable energy sources counts here.

## **Concerning cooperation mechanisms:**

- Ø For joint projects or statistical transfers will the price of the renewable energy transferred be published?**

Article 6(2) of the Directive stipulates that Member States notify the Commission of the quantity and price of statistical transfers, and this data will be made public as specified in Article 24 (2) (d) in an appropriate form, bearing in mind any requirement of confidentiality of commercially sensitive information. There is no obligation in the Directive to disclose the price of joint projects.

- Ø What does the forecast document have to contain? Does it have to contain information on biofuel trade?**

Article 4(3) requires Member States to publish and notify to the Commission the estimated use of statistical transfers and joint projects for the whole period up to 2020. It does not refer to physical trade. Therefore, no information on biofuel trade is required here. The Commission has proposed to Member States that the data of the forecast document follow the same format as the relevant section of the national renewable energy action plan template.

- Ø What happens if the NREAP will report different national targets and consequently a different need for the use of the cooperation mechanism than the forecast document?**

It might be the case that national target setting will be finalised after the submission of the forecast document by 31 December 2009, and therefore the estimated use of the cooperation mechanism changes. In case there are changes these should be indicated in the NREAP. It is more important to submit the forecast document on time than to communicate there the final estimations used in the NREAP. This is because the forecast document is intended to provide other Member States with a sense of the scope for making use of the Directive's cooperation mechanisms.