

Renewable Energy Strategy

IDENTIFICATION

2. Are you responding to this questionnaire on behalf of /as:

-single choice reply-(optional)

Industry

3. Please indicate your country -single choice reply-(optional)

Germany

4. How would you prefer your contribution to be published on the Commission website, if at all?

-single choice reply-(optional)

Anonymously (I consent to publication of all information in my contribution and I declare that none of it is under copyright restrictions that prevent publication)

A. GENERAL POLICY APPROACH

A.1. Is there a role for new targets for renewable energy sources post-2020 assuming that any targets must be consistent with climate mitigation and energy efficiency policies and targets as is currently the case with the 20/20/20 targets in the Europe 2020 strategy?

-multiple choices reply-(optional)

Yes, a mandatory target at EU level is appropriate

A.1.1. Please explain the reasons for your answer (such as the scope and contribution from GHG targets/ETS, the need to address other environmental, security of supply or technological development benefits) -open reply-(optional)

For a healthy development of the industry, it is important to have a stable and longer-term framework. Investment security is key when it comes to renewable energy projects. Mandatory minimum targets on EU level have proven successful in providing this framework, as e.g. the development of the renewables industry in Germany shows. To continue on this path, a mandatory binding minimum target of 45 % for 2030 on EU level is the appropriate instrument. Due to the long(er) investment cycles and resulting importance of long-term security, the mandatory minimum target of 45% to 2030 should be set rather now than later – to avoid rushes or stop and go policies as they have proven detrimental in the past (e.g. in the UK recently with the rushed cut in FITs for solar PV) and as they would contravene healthy growth of the renewables industry.

A.2. Are other policy elements necessary to promote renewable energy post-2020, such as:

-multiple choices reply-(optional)

Enhanced focus on R&D to bring down the costs of renewables technologies - Facilitation policies (faster and easier permitting, improved access to the grid and further grid investments, availability of more sites for renewables, etc) - Abolition of support mechanism or subsidies to other energy sources - Public procurement obligations in support of renewables - Better financing possibilities - Continue to ensure sustainability and scalability - Other (please specify)

Please specify which other policy elements? -open reply-(optional)

As mentioned above the 45 % minimum target for 2030 is only one vital precondition for a continued increase of renewable energies in our energy supply. At least as important is a comprehensive and stable policy as well as a reliable regulatory framework that sends long-term signals to developers and investors. An additional public procurement obligation, parallel to the one proposed with the Energy

Efficiency Directive, could also be interesting. Furthermore, financing possibilities for consumers could be improved - through investment support measures, reducing up-front costs. Of course, the abolition of support to fossil and nuclear energy sources would help actually levelling the playing field – and make the market fair for renewables to compete in.

B. FINANCIAL SUPPORT

B.1. Do you consider that financial support will continue to be necessary to support renewables post 2020 given their expected greater penetration? -single choice reply-(optional)

Yes

B.2. If renewable energy sources require support post-2020, how do you think this can best be achieved with a view to achieving a cost-effective deployment? -multiple choices reply-(optional)

Making support schemes more market-oriented (please specify how) - Accelerate convergence of national support schemes

Please specify how to make support schemes more market-oriented -open reply-(optional)

As mentioned above, there is no “one size fits all” solution to support schemes. Technologies are different, markets are different, conditions are different, and Member States are different... An EU wide support scheme would in this context not make any sense, neither would blind convergence. Such decisions have to be left to the Member States, and while voluntary cooperation may (or may not) prove a good idea for some, it may as well be catastrophic for others. Whereas it certainly makes sense for Member States to learn from good practise examples such as technology specific support, degression rates, priority grid access etc., there is no use in pushing for faster convergence of support systems, where this is not being developed on a factual basis on an equal footage between all participants of a cooperation project. The idea behind the support for renewables is the creation of a level playing field. The ideal would be to one day get to such a market, and that would mean that financial support schemes could gradually be phased out. However, with subsidies to conventional energy sources, lengthy administrative procedures, unstable policy supports and the like, this may still be a long way.

B.3. Do you think it would be useful to develop common approaches as regards Member States' financial support for renewables? -single choice reply-(optional)

No, support levels should be entirely up to Member States

B.4. Should the structure of financial support be gradually aligned EU-wide? -single choice reply-(optional)

No

B.5. With regard to questions B.3. and B.4. please specify if you see a difference between the different sectors (electricity, heating and cooling, transport). -open reply-(optional)

B.6. How do you see the relation between support schemes for renewable energy and the requirements of the internal electricity market for the period after 2020 against the background of a rising share of renewables? -multiple choices reply-(optional)

Member States need to be able to continue to operate support schemes on a national level and retain control over who benefits from national schemes

B.7. Do national support schemes and differences between such schemes distort competition? -single choice reply-(optional)

No, support schemes do not have a significant distorting impact on competition

C. ADMINISTRATIVE PROCEDURES

C.1. Which of the following issues relating to administrative procedures, information and

Length and complexity of administrative procedures relating to authorisation/certification/licensing - Lack of commonly agreed

training do you consider acting as a serious impediment to further growth of renewables following Member States' implementation of the provisions of the Directive? -multiple choices reply- (optional)	technical specifications - Lack of information on support schemes or other - Lack of credible and certified training and qualification
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C.1.1. Please provide explanations and specific examples where available

-open reply-(optional)

Permitting procedures are much too complex and protracted which complicates and hinders the planning and construction of new renewable energy plants. That again makes investment in renewables unattractive – in particular as the regulatory and financial support framework might change over time. Such insecurities are detrimental to development of the industry. In addition to that, complex permitting and admission procedures are predestined to discourage small scale construction projects. In particular private persons risk to be overwhelmed by the number and complexity of different regulations to take care of and run the risk to be demotivated before even having started. Other obstacles are regional differing rules regarding environmental protection or building law, different tax legislations and more. They make it hard for firms to operate EU wide.

C.2. Which policy response to the problems identified above do you consider appropriate?

-single choice reply-(optional)

Strengthen rules to intrude more directly into Member States procedures in terms of roles of different actors (e.g. one-stop-shop), maximum time-frame or other

D. GRID INTEGRATION OF ELECTRICITY FROM RENEWABLE ENERGY SOURCES

D.1. Do you consider that any of the following national rules and framework conditions will still create obstacles to renewable energy production after 2020? -multiple choices reply-

(optional)

Grid connection rules - Cost-sharing rules - Balancing rules - Curtailment regime

D.1.1. Please specify which obstacles and the nature and degree of them for each -open reply-(optional)

D.2. Which renewables-specific grid related rules do you consider necessary and proportionate in a post-2020 perspective?

-multiple choices reply-(optional)

Obligation for network operator to develop network - Priority or guaranteed access - Priority dispatch and obligation on TSO to counteract curtailment - Other (please specify)

Please specify which other rules -open reply-(optional)

In addition to priority or guaranteed dispatch, the German so-called "hardship clause" is recommended: the grid operator has to pay damages to the renewable energy plant owner, for the time and in case of the curtailment. As the grid operator is responsible for the balancing in the grid, as well as for – in Germany – sufficiently strong and stable grid infrastructure, he is also held liable.

D.2.1. Please explain why -open reply-(optional)

D.3. With regard to system integration of wind and solar power, what measures do you consider most important to increase the flexibility reserve of the system: -multiple choices reply-(optional)

Increase availability of demand response (smart grids ...) - Accelerate infrastructure development and interconnection - Market-based measures: better use of interconnectors (implicit auctions), trading closer to real time - Increased availability of storage - Enable renewable generators to offer balancing services to TSOs - Other (please specify)

Please specify which other measures -open reply-(optional)

For the system integration of especially solar power it is crucial to increase the availability of demand response such as smart grids and to accelerate the building and development of infrastructure. Through decentral generation, renewables could offer balancing services to the system and contribute to stability. Also the market needs to change: more efficient use of forecasting capabilities as well as trading closer to real time would allow for more flexibility in the market.

E. MARKET INTEGRATION

E.1. In which of the following ways could renewable energy be made responsive to market signals? -multiple choices reply-(optional)

E.2. How can it be ensured that market arrangements reward flexibility?
-multiple choices reply-(optional)

Develop demand response to market signals (please specify, e.g. smart grids, smart meters, demand aggregation, interruptible demand)

Develop demand response to market signals : please specify, e.g. smart grids, smart meters, demand aggregation, interruptible demand
-open reply-(optional)

Renewables have – thanks to their often decentralized generation – great potential for decentralized demand response management systems. They can be very well integrated in local smart grids in which the DSOs have greater responsibility for the management, consumers are equipped with smart meters and watch their own consumption (possibly partly covered by their own small scale PV installations), and where all players work together smoothly, in particular also with improved communication with TSOs.

E.3. In how far do you think today's market design needs to be adapted to provide an appropriate framework for renewables -single choice reply-(optional)

Electricity markets should evolve into energy services markets, earning revenues from more than just electricity

F. RENEWABLES IN HEATING AND COOLING

F.1. What do you consider to be the main barriers against a stronger uptake of renewable energy in the heating and cooling market beyond 2020? -multiple choices reply-(optional)

Costs/lack of financial support - Building regulations etc. - Lack of awareness - Lack of suitable information - Lack of public support - Lack of capacity (installers, other)

F.2. What pathways do you consider to be the most promising for further increasing the share of renewable energy in heating and cooling beyond 2020? -multiple choices reply-(optional)

F.3. How do you see the interaction of promoting further use of renewable energy in heating and cooling and enhancing energy efficiency in this sector? -open reply-(optional)

They need to go together and they interact considerably. However, that does not exclude separate instruments for renewable heating and cooling and energy efficiency. One could think of e.g. encouraging cooperation with architects, and designing and promoting energy efficient renewable homes.

G. RENEWABLES IN TRANSPORT

G.1. What do you consider to be the main barriers against a stronger uptake of renewable energy in transport? -multiple choices reply-(optional)

Lack of standards - Lack of infrastructure - Lack of awareness - Lack of suitable information - Limits of availability of sustainably produced biofuels

G.2. What sectors of transport do you consider to be the most promising for further increasing the share of renewable energy? -multiple choices reply-(optional)	Road for passengers - Rail - Air
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G.2.1. Please explain your answer -open reply-(optional)	
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H. SUSTAINABILITY

H.1. Do you think that additional sustainability criteria are necessary in the post 2020 period? -multiple choices reply-(optional)	Yes, sustainability criteria should apply to both all biomass and fossil fuels
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H.1.1. Please explain -open reply-(optional)	
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I. REGIONAL AND INTERNATIONAL DIMENSIONS

I.1. Do you consider current rules for cooperation between Member States sufficient to fulfil their purpose, i.e. realisation of cost-efficient renewable potential in the EU? -single choice reply-(optional)	Yes
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I.2. Do you think the EU should further facilitate cooperation with third countries when it comes to the development of the potential for renewable energy? -single choice reply-(optional)	No, the EU should first focus on developing its own renewable potential
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I.3. Should investments in electricity networks in some Member States (i.e. Spain, Greece, Italy) be prioritized for this purpose? -single choice reply-(optional)	No (explain why)
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Please explain why -open reply-(optional)	
The focus should be put on developing the own potential of renewable energies within Europe in general and without prioritizing among Member States.	

I.4. Which measures do you consider appropriate and necessary in order to foster cooperation with third countries in this area? -single choice reply-(optional)	Bilateral agreements between Member States and third countries
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I.5. In its Communication on security of supply and energy cooperation – "The EU Energy Policy: Engaging with Partners beyond our Borders", the European Commission proposes to promote cooperation on renewable energy projects with the Southern Mediterranean countries and to gradually build a renewed EU-Mediterranean energy partnership focus on electricity and renewable energy. How do you consider this should relate with the EU internal renewables policy? What should be the priorities? -open reply-(optional)	
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As long as it supports the EU internal renewables policy, such initiatives can be valuable. However, the EU should not be able to oblige Member States to participate or to take on any role in that, if Member States decide that their renewables industry is not ready for that, or for other reasons oppose to it.	
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I.6. The possibility to explore regional cooperation and a coordinated, more strategic approach to grid connection for the rapidly growing volume of offshore wind generation in the North Sea is currently being explored in the framework of the	
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North Sea Countries Offshore Grid Initiative (NSCOGI). Do you think such cooperation should be further fostered? What benefits do you think could arise from it? Do you consider that this experience could be generalised and applied elsewhere? -open reply-(optional)

This is based on existing cooperation mechanisms.

J. TECHNOLOGY DEVELOPMENT

J.1. For a first set of renewable technologies, namely wind, solar, bio-energy, the SET Plan aims at a cost-competitive market roll out of renewable energy by 2020. It also aims at enabling integration of renewable energy into the electricity grid and smart cities and communities. In your view, what would be the remaining key challenges of these technologies to be addressed by research and innovation in view of the 2050 objectives?

-multiple choices reply-(optional)

Technology performance and cost-competitiveness - Industrial manufacturing and supply chain

J.2. Which additional measures and/or instruments should be developed to address these technologies and their remaining challenges and to ensure that the EU innovation fabric is geared to supporting the significant deployment up to 2050? -open reply-(optional)

J.3. In your point of view, which technologies other than those covered by the current industrial initiatives should be given priority in the post-2020 perspective? Please justify with reference to the criteria mentioned above, i.e. large-scale availability and willingness of industry to engage in public private partnerships?

-open reply-(optional)

The future energy system will have to be based on a broad mix of various renewable energy technologies and sources, not only large-scale, but definitely also on smaller scale and on distributed levels. Solar certainly will have to play a more important role in the future than it is the case by now. This system change should be part of further development of the SET-Plan.

J.4. How successful do you consider the existing measures have been and which have been the main drawbacks? -single choice reply-

(optional)

Successful but some drawbacks (please specify which)

Please specify which drawbacks -open reply-(optional)

One particular drawback – if to be called so – would be that while indeed some progress was made in the renewables sector, there continues to be support for fossil and nuclear energy, even under the SET Plan. Also, the role they will have in HORIZON2020 is questionable – when the EU is really going for system transformation (as predicted in the Energy Roadmap 2050 and committed to with the Roadmap to a low carbon society as well as the CO₂ reduction objectives), then why should so much money still be spend on development of “technologies of the past”?

J.5. Do you consider that assistance in technology development should be linked to a certain result to be achieved by a certain deadline?

-open reply-(optional)

In general no. However, some indicators to avoid wasting money are appropriate - they will however have to be corresponding to the specificities of the respective technology and the project.

IDENTIFICATION

2. Are you responding to this questionnaire on behalf of /as:

NGO

-single choice reply-(optional)	
3. Please indicate your country -single choice reply-(optional)	Sweden
4. How would you prefer your contribution to be published on the Commission website, if at all? -single choice reply-(optional)	Anonymously (I consent to publication of all information in my contribution and I declare that none of it is under copyright restrictions that prevent publication)
A. GENERAL POLICY APPROACH	
A.1. Is there a role for new targets for renewable energy sources post-2020 assuming that any targets must be consistent with climate mitigation and energy efficiency policies and targets as is currently the case with the 20/20/20 targets in the Europe 2020 strategy? -multiple choices reply-(optional)	Yes, a combination of EU and sectoral level targets is appropriate
A.1.1. Please explain the reasons for your answer (such as the scope and contribution from GHG targets/ETS, the need to address other environmental, security of supply or technological development benefits) -open reply-(optional)	
<p>Mål uttryckta från EU-nivå etablerar sig i medborgarnas medvetande och har möjlighet att skapa en normativ attitydsförändring även på gräsrotsnivå. Målen ger EU en central och samordnande roll och EU blir samtidigt ansvarigt för att målen realiserar. EU-mål blir även en god utgångspunkt för vidare nationella och regionala klimatstrategier bland medlemsländerna. Sektorsspecifika åtgärder behövs för att behålla och vidareutveckla en styrning av nationella miljöeffektiviseringar beroende på nationsbundna befintliga utmaningar. Det är här man kan sätta in skräddarsydda åtgärdspaket för sektorer som inte ligger i fas med utvecklingstakten. Dessa två angreppssätt måste harmoniseras för bäst effekt. Det kan även finnas rent pedagogiska poänger att ta genom att arbeta med miljömål på en multinivå. Det kan upplevas som mer anpassat medlemslandets i fråga egna förutsättningar och sektorsföreträdare kan uppleva en större rörelsefrihet och tydligare incitament som goodwill.</p>	
A.2. Are other policy elements necessary to promote renewable energy post-2020, such as: -multiple choices reply-(optional)	Enhanced focus on R&D to bring down the costs of renewables technologies - Facilitation policies (faster and easier permitting, improved access to the grid and further grid investments, availability of more sites for renewables, etc) - Abolition of support mechanism or subsidies to other energy sources - Public procurement obligations in support of renewables - Continue to ensure sustainability and scalability - Other (please specify)
Please specify which other policy elements? -open reply-(optional)	
<p>Det är viktigt att användningen av den svenska och finska skogsråvaran som sköts med jämställda miljö- och produktionsmål inte begränsas av regler som syftar till att undvika dålig skötsel och avskogning i andra delar av världen. Genom att underlätta regelverket, tillgängliggöra nätverk och sänka trösklar för främst nyetableringar inom exempelvis cleantechsektorn skapar man ett långsiktigt gynnsamt klimat även för forskning och utveckling. Att ge ekonomiska stöd till energiproduktion som inte ligger i linje med klimatmål är kontraproduktivt och bör undvikas. I de fall ekonomiskt stöd ges ska det enbart på till att stödja hållbara energikällor.</p>	
B. FINANCIAL SUPPORT	
B.1. Do you consider that financial support will continue to be necessary to support renewables post 2020 given their expected greater penetration? -single choice reply-(optional)	Yes
B.2. If renewable energy sources require	Making support schemes more market-oriented (please specify

support post-2020, how do you think this can best be achieved with a view to achieving a cost-effective deployment? -multiple choices reply-(optional)	how) - Open up national support schemes to cross-border projects
Please specify how to make support schemes more market-oriented -open reply-(optional)	
Det svenska systemet med elcertifikat har fungerat väl för att stimulera utbyggnationen av förnybara energislag. Elcertifikatsmarknaden byggs nu också ihop med Norge. Fler gränsöverskridande system av den typen är värt att analysera.	
B.3. Do you think it would be useful to develop common approaches as regards Member States' financial support for renewables? -single choice reply-(optional)	Yes, with EU-wide benchmark values for support level per technology
B.4. Should the structure of financial support be gradually aligned EU-wide? -single choice reply-(optional)	No
B.5. With regard to questions B.3. and B.4. please specify if you see a difference between the different sectors (electricity, heating and cooling, transport). -open reply-(optional)	
B.6. How do you see the relation between support schemes for renewable energy and the requirements of the internal electricity market for the period after 2020 against the background of a rising share of renewables? -multiple choices reply-(optional)	Member States should open their support schemes to renewable generation from third countries
Please explain how it could be achieved for third countries -open reply-(optional)	
B.7. Do national support schemes and differences between such schemes distort competition? -single choice reply-(optional)	Yes, some support schemes are more distorting than others (please specify which you consider most distorting)
Please specify which support schemes you consider most distorting -open reply-(optional)	
C. ADMINISTRATIVE PROCEDURES	
C.1. Which of the following issues relating to administrative procedures, information and training do you consider acting as a serious impediment to further growth of renewables following Member States' implementation of the provisions of the Directive? -multiple choices reply-(optional)	Length and complexity of administrative procedures relating to authorisation/certification/licensing - Lack of commonly agreed technical specifications
C.1.1. Please provide explanations and specific examples where available -open reply-(optional)	
C.2. Which policy response to the problems identified above do you consider appropriate?	Push for more standardisation and harmonisation on EU level or mutual recognition

-single choice reply-(optional)

D. GRID INTEGRATION OF ELECTRICITY FROM RENEWABLE ENERGY SOURCES

D.1. Do you consider that any of the following national rules and framework conditions will still create obstacles to renewable energy production after 2020? -multiple choices reply-(optional)

Grid connection rules - Cost-sharing rules - Balancing rules

D.1.1. Please specify which obstacles and the nature and degree of them for each -open reply-(optional)

För att undvika problem med nättillgången behövs transparens för att undvika att elektricitet från förnybara källor diskrimineras.

D.2. Which renewables-specific grid related rules do you consider necessary and proportionate in a post-2020 perspective? -multiple choices reply-(optional)

Priority or guaranteed access

D.2.1. Please explain why -open reply-(optional)

D.3. With regard to system integration of wind and solar power, what measures do you consider most important to increase the flexibility reserve of the system: -multiple choices reply-(optional)

Increase availability of demand response (smart grids ...) -
Accelerate infrastructure development and interconnection -
Market-based measures: better use of interconnectors (implicit auctions), trading closer to real time

E. MARKET INTEGRATION

E.1. In which of the following ways could renewable energy be made responsive to market signals? -multiple choices reply-(optional)

E.2. How can it be ensured that market arrangements reward flexibility? -multiple choices reply-(optional)

Dedicated arrangements to reward availability of generation capacity

E.3. In how far do you think today's market design needs to be adapted to provide an appropriate framework for renewables -single choice reply-(optional)

Electricity markets should evolve into energy services markets, earning revenues from more than just electricity

F. RENEWABLES IN HEATING AND COOLING

F.1. What do you consider to be the main barriers against a stronger uptake of renewable energy in the heating and cooling market beyond 2020? -multiple choices reply-(optional)

Costs/lack of financial support - Building regulations etc. - Lack of awareness

F.2. What pathways do you consider to be the most promising for further increasing the share of renewable energy in heating and cooling beyond 2020? -multiple choices reply-(optional)

Biomass - Electrification together with higher share of renewables in electricity production

F.3. How do you see the interaction of promoting further use of renewable energy in heating and cooling and enhancing

energy efficiency in this sector? -open reply-(optional)

G. RENEWABLES IN TRANSPORT

G.1. What do you consider to be the main barriers against a stronger uptake of renewable energy in transport? -multiple choices reply-(optional)

Costs - Pace of technology development - Lack of standards - Lack of infrastructure - Lack of awareness - Limits of availability of sustainably produced biofuels - Other (please specify)

Please specify which other barriers -open reply-(optional)

Den svenska erfarenheten är att det inte räcker med att förnybara drivmedel är lika dyra/billiga per mil som bensin eller diesel för att en "vanlig" användare ska byta bil och bränsle. Det krävs att det är billigare. Ett annat problem är att bilarna som är anpassade för biodrivmedel är dyrare än de traditionella. För att nå målen för transportsektorn, att minska användningen av fossila och öka användningen av förnybara drivmedel, måste prisskillnaden öka. Det största problemet är kanske de stora subventioner som läggs på fossila bränslen. International Energy Agency har beräknat att år 2010 subventionerades fossila bränslen med nästan 3 000 miljarder kronor. Störst är subventionerna i oljeproducerande länder. Men även länder som Sverige subventionerar fossila bränslen - 23 miljarder kronor 2010 enligt OECD. Långsiktiga spelregler är viktiga. Satsningen på förgasning av biomassa till drivmedel i Örnsköldsvik ligger på is pga att de indiska ägarna inte tycker att de nationella spelreglerna är tillräckligt tydliga och långsiktiga. Många väntar på ETT alternativ till fossila drivmedel men fler och fler bedömer att vi kommer att behöva många lösningar för att klara våra behov. Rent praktiskt blir det krångligare än det vi är vana med och kräver bl. a. dedikerade fordon och olika krav för distribution och tankställen.

G.2. What sectors of transport do you consider to be the most promising for further increasing the share of renewable energy? -multiple choices reply-(optional)

Road for passengers - Road for goods

G.2.1. Please explain your answer -open reply-(optional)

H. SUSTAINABILITY

H.1. Do you think that additional sustainability criteria are necessary in the post 2020 period? -multiple choices reply-(optional)

Yes, sustainability criteria should apply to both all biomass and fossil fuels

H.1.1. Please explain -open reply-(optional)

Det är väldigt bra att vi utvecklar hållbara drivmedel. Det borde i linje med detta även krävas att de fossila drivmedlen är hållbara för att få säljas. Hur kan man låta bli att kräva hållbarhet på de bränslen som skapar problemen och samtidigt kräva det av de som är förnybara?

I. REGIONAL AND INTERNATIONAL DIMENSIONS

I.1. Do you consider current rules for cooperation between Member States sufficient to fulfil their purpose, i.e. realisation of cost-efficient renewable potential in the EU? -single choice reply-(optional)

No (please specify how they should be amended or which elements added)

Please specify how they should be amended or which elements added
-open reply-(optional)

I.2. Do you think the EU should further facilitate cooperation with third countries when it comes to the development of the potential for

Yes, cooperation with third countries should be further promoted (please specify how and with whom, i.e. only neighbouring countries or more widely)

renewable energy? -single choice reply-(optional)

Please specify how and with whom, i.e. only neighbouring countries or more widely -open reply-(optional)

I.3. Should investments in electricity networks in some Member States (i.e. Spain, Greece, Italy) be prioritized for this purpose? -single choice reply-(optional)

Yes (explain in which way and to which degree)

Please explain in which way and to which degree -open reply-(optional)

Särskild uppmärksamhet till vissa medlemsländer behövs för att möjliggöra en bredare samverkan inom EU.

I.4. Which measures do you consider appropriate and necessary in order to foster cooperation with third countries in this area? -single choice reply-(optional)

Agreements between the EU and third countries

I.5. In its Communication on security of supply and energy cooperation – "The EU Energy Policy: Engaging with Partners beyond our Borders", the European Commission proposes to promote cooperation on renewable energy projects with the Southern Mediterranean countries and to gradually build a renewed EU-Mediterranean energy partnership focus on electricity and renewable energy. How do you consider this should relate with the EU internal renewables policy? What should be the priorities? -open reply-(optional)

I.6. The possibility to explore regional cooperation and a coordinated, more strategic approach to grid connection for the rapidly growing volume of offshore wind generation in the North Sea is currently being explored in the framework of the North Sea Countries Offshore Grid Initiative (NSCOGI). Do you think such cooperation should be further fostered? What benefits do you think could arise from it? Do you consider that this experience could be generalised and applied elsewhere? -open reply-(optional)

Ja, det kan stärka regionernas egen miljöambition och öppnar för att mer använda bredare samverkansformer. Effekterna av detta bör vägleda beslut att göra liknande ansatser.

J. TECHNOLOGY DEVELOPMENT

J.1. For a first set of renewable technologies, namely wind, solar, bio-energy, the SET Plan aims at a cost-competitive market roll out of renewable energy by 2020. It also aims at enabling integration of renewable energy into the electricity grid and smart cities and communities. In your view, what would be the remaining key challenges of these technologies to be addressed by research and innovation in view of the 2050 objectives?

-multiple choices reply-(optional)

Technology performance and cost-competitiveness

J.2. Which additional measures and/or instruments should be developed to address these technologies and their remaining challenges and to ensure that the EU innovation fabric is geared to supporting the significant deployment up to 2050? -open reply-(optional)

J.3. In your point of view, which technologies other than those covered by the current industrial initiatives should be given priority in the post-2020 perspective? Please justify with reference to the criteria mentioned above, i.e. large-scale availability and willingness of industry to engage in public private partnerships?

-open reply-(optional)

Teknologier vars slutprodukt behöver en annan/förbättrad infrastruktur, exempelvis inom distribution, än vad som i dag är fallet.
Lågenergialternativ, i synnerhet i hemmet.

J.4. How successful do you consider the existing measures have been and which have been the main drawbacks? -single choice reply-
(optional)

Successful but some drawbacks (please specify which)

Please specify which drawbacks -open reply-(optional)

Samspel mellan stater, EU och nationella producenter har inte varit tillräckligt utvecklat. Utveckling av bioraffinaderier för produktion av både biodrivmedel och andra icke fossilbaserade produkter har kommit igång men stannat av. Produktionen av etanol har gått från att vara räddningen till att uppfattas som värre än fossilt trots att det som säljs i Sverige garanterat släpper ut 30-procent mindre koldioxid. Produktion av drivmedel via förgasning av biomassa står och stampar pga höga malningskostnader för råvaran.

J.5. Do you consider that assistance in technology development should be linked to a certain result to be achieved by a certain deadline?

-open reply-(optional)

Ja, men det bör även finnas en flexibilitet för att projekt ska slutföras. Tillräckliga och strategiska stödanordningar måste sättas in i tid för att det ska ske. Ansvaret ligger därför både på utvecklingssidan (R&D, producenter) och på samordnarsidan (EU, medlemsländerna).

IDENTIFICATION

2. Are you responding to this questionnaire on behalf of /as:

-single choice reply-(optional)

Industry

3. Please indicate your country -single choice reply-
(optional)

Germany

4. How would you prefer your contribution to be published on the Commission website, if at all?

-single choice reply-(optional)

Anonymously (I consent to publication of all information in my contribution and I declare that none of it is under copyright restrictions that prevent publication)

A. GENERAL POLICY APPROACH

A.1. Is there a role for new targets for renewable energy sources post-2020 assuming that any targets must be consistent with climate mitigation and energy efficiency policies and targets as is currently the case with the 20/20/20 targets in the Europe 2020 strategy?

-multiple choices reply-(optional)

Yes, a combination of EU and sectoral level targets is appropriate

A.1.1. Please explain the reasons for your answer (such as the scope and contribution from GHG targets/ETS, the need to address other environmental, security of supply or technological development benefits) -open reply-(optional)

Die Aufteilung der Zielwerte auf ein gesamthaftes EU-Ziel und darüberhinaus auf Sektorziele erscheint als die beste Möglichkeit im Bereich der Wärmegewinnung, die in den MS unterschiedlichen Ausgangspositionen und Voraussetzungen zur Zielerreichung optimal ausnutzen zu können. Es sollten auch verpflichtende sektorale Ziele für die MS ausverhandelt werden. Ohne verpflichtende Zielvorgaben wird die derzeitige Politik geschwächt und der weitere Weg in Richtung Erneuerbare Energieträger wird nicht mehr ausreichend konsequent verfolgt.

A.2. Are other policy elements necessary to promote renewable energy post-2020, such as:

-multiple choices reply-(optional)

Enhanced focus on R&D to bring down the costs of renewables technologies - Facilitation policies (faster and easier permitting, improved access to the grid and further grid investments,

	availability of more sites for renewables, etc) - Continue to ensure sustainability and scalability
B. FINANCIAL SUPPORT	
B.1. Do you consider that financial support will continue to be necessary to support renewables post 2020 given their expected greater penetration? -single choice reply-(optional)	For selected technologies/circumstances/markets (please specify)
Please specify which technologies/circumstances/markets -open reply-(optional)	
Für den im Wärmemarkt herrschenden Modernisierungstau ist es notwendig gezielt auf die Situationen einzuwirken und somit auch den größtmöglichen Erfolg zu sichern. Dies kann nur durch Focussierung auf bestimmte Techniken und Gruppen erreicht werden. Wie in der Vergangenheit hat eine zu breite Streuung zu Verunsicherung in den Bevölkerungen der Mitgliedsstaaten geführt.	
B.2. If renewable energy sources require support post-2020, how do you think this can best be achieved with a view to achieving a cost-effective deployment? -multiple choices reply-(optional)	Phase out support schemes over time (please specify for which technologies if applicable)
Please specify for which technologies (if applicable) to phase out support schemes over time	
-open reply-(optional)	
Dies ist vor allem im Wärmemarkt erforderlich, da kurzfristige hochdotierte Fördermaßnahmen zu einem falschen Verständnis bei den Anwendern führen.	
B.3. Do you think it would be useful to develop common approaches as regards Member States' financial support for renewables? -single choice reply-(optional)	Yes, with benchmark values for support level per technology per Member State
B.4. Should the structure of financial support be gradually aligned EU-wide? -single choice reply-(optional)	
B.5. With regard to questions B.3. and B.4. please specify if you see a difference between the different sectors (electricity, heating and cooling, transport). -open reply-(optional)	
In den vergangenen Jahren wurde zu unet und zu unterschiedlich auf die verschiedenen Sektoren eingewirkt, sodass nun ein erhöhter Druck im Wärmemarkt, der nicht in der Weise reagiert wie es möglich wäre, notwendig wird um die angestrebten Ziele zu erreichen.	
B.6. How do you see the relation between support schemes for renewable energy and the requirements of the internal electricity market for the period after 2020 against the background of a rising share of renewables? -multiple choices reply-(optional)	
B.7. Do national support schemes and differences between such schemes distort competition? -single choice reply-(optional)	Yes, some support schemes are more distorting than others (please specify which you consider most distorting)
Please specify which support schemes you consider most distorting -open reply-(optional)	
Nationale Unterstützungsschematas mit Förderanteilen von bis zu 85 Prozent der Investitionssumme wie z.B. in Ungarn führen zu nicht	

zielführenden Ergebnissen und verfehlen die Bewusstseinsveränderung im Umgang mit Energie jedweder Form der breiten Bevölkerung in den Mitgliedsstaaten durch den automatischen Ausschluss derer, die nicht von berufswegen an diesen Förderschemata teilnehmen können.

C. ADMINISTRATIVE PROCEDURES

C.1. Which of the following issues relating to administrative procedures, information and training do you consider acting as a serious impediment to further growth of renewables following Member States' implementation of the provisions of the Directive? -multiple choices reply-
(optional)

C.1.1. Please provide explanations and specific examples where available
-open reply-(optional)

C.2. Which policy response to the problems identified above do you consider appropriate?
-single choice reply-(optional)

Push for more standardisation and harmonisation on EU level or mutual recognition

D. GRID INTEGRATION OF ELECTRICITY FROM RENEWABLE ENERGY SOURCES

D.1. Do you consider that any of the following national rules and framework conditions will still create obstacles to renewable energy production after 2020? -multiple choices reply-
(optional)

D.1.1. Please specify which obstacles and the nature and degree of them for each -open reply-(optional)

D.2. Which renewables-specific grid related rules do you consider necessary and proportionate in a post-2020 perspective?
-multiple choices reply-(optional)

D.2.1. Please explain why -open reply-(optional)

D.3. With regard to system integration of wind and solar power, what measures do you consider most important to increase the flexibility reserve of the system: -multiple choices reply-(optional)

E. MARKET INTEGRATION

E.1. In which of the following ways could renewable energy be made responsive to market signals? -multiple choices reply-(optional)

E.2. How can it be ensured that market

arrangements reward flexibility? -multiple choices reply-(optional)	
E.3. In how far do you think today's market design needs to be adapted to provide an appropriate framework for renewables -single choice reply-(optional)	
F. RENEWABLES IN HEATING AND COOLING	
F.1. What do you consider to be the main barriers against a stronger uptake of renewable energy in the heating and cooling market beyond 2020? -multiple choices reply-(optional)	Costs/lack of financial support - Lack of awareness - Lack of suitable information
F.2. What pathways do you consider to be the most promising for further increasing the share of renewable energy in heating and cooling beyond 2020? -multiple choices reply-(optional)	Biomass
F.3. How do you see the interaction of promoting further use of renewable energy in heating and cooling and enhancing energy efficiency in this sector? -open reply-(optional)	
G. RENEWABLES IN TRANSPORT	
G.1. What do you consider to be the main barriers against a stronger uptake of renewable energy in transport? -multiple choices reply-(optional)	
G.2. What sectors of transport do you consider to be the most promising for further increasing the share of renewable energy? -multiple choices reply-(optional)	
G.2.1. Please explain your answer -open reply-(optional)	
H. SUSTAINABILITY	
H.1. Do you think that additional sustainability criteria are necessary in the post 2020 period? -multiple choices reply-(optional)	
H.1.1. Please explain -open reply-(optional)	
I. REGIONAL AND INTERNATIONAL DIMENSIONS	
I.1. Do you consider current rules for cooperation between Member States sufficient to fulfil their purpose, i.e. realisation of cost-efficient renewable potential in the EU? -single choice reply-(optional)	
I.2. Do you think the EU should further facilitate	

cooperation with third countries when it comes to the development of the potential for renewable energy? -single choice reply-(optional)

I.3. Should investments in electricity networks in some Member States (i.e. Spain, Greece, Italy) be prioritized for this purpose? -single choice reply-(optional)

I.4. Which measures do you consider appropriate and necessary in order to foster cooperation with third countries in this area? -single choice reply-(optional)

I.5. In its Communication on security of supply and energy cooperation – "The EU Energy Policy: Engaging with Partners beyond our Borders", the European Commission proposes to promote cooperation on renewable energy projects with the Southern Mediterranean countries and to gradually build a renewed EU-Mediterranean energy partnership focus on electricity and renewable energy. How do you consider this should relate with the EU internal renewables policy? What should be the priorities? -open reply-(optional)

I.6. The possibility to explore regional cooperation and a coordinated, more strategic approach to grid connection for the rapidly growing volume of offshore wind generation in the North Sea is currently being explored in the framework of the North Sea Countries Offshore Grid Initiative (NSCOGI). Do you think such cooperation should be further fostered? What benefits do you think could arise from it? Do you consider that this experience could be generalised and applied elsewhere? -open reply-(optional)

J. TECHNOLOGY DEVELOPMENT

J.1. For a first set of renewable technologies, namely wind, solar, bio-energy, the SET Plan aims at a cost-competitive market roll out of renewable energy by 2020. It also aims at enabling integration of renewable energy into the electricity grid and smart cities and communities. In your view, what would be the remaining key challenges of these technologies to be addressed by research and innovation in view of the 2050 objectives? -multiple choices reply-(optional)

J.2. Which additional measures and/or instruments should be developed to address these technologies and their remaining challenges and to ensure that the EU innovation fabric is geared to supporting the significant deployment up to 2050? -open reply-(optional)

J.3. In your point of view, which technologies other than those covered by the current industrial initiatives should be given priority in the post-2020 perspective? Please justify with reference to the criteria mentioned above, i.e. large-scale availability and willingness of industry to engage in public private partnerships? -open reply-(optional)

J.4. How successful do you consider the existing measures have been and which have

been the main drawbacks? -single choice reply- (optional)	
J.5. Do you consider that assistance in technology development should be linked to a certain result to be achieved by a certain deadline? -open reply-(optional)	

<h2>IDENTIFICATION</h2>	
2. Are you responding to this questionnaire on behalf of /as: -single choice reply-(optional)	Industry
3. Please indicate your country -single choice reply-(optional)	Other (please specify)
Which other country? -open reply-(optional)	Turkey
4. How would you prefer your contribution to be published on the Commission website, if at all? -single choice reply-(optional)	Anonymously (I consent to publication of all information in my contribution and I declare that none of it is under copyright restrictions that prevent publication)
<h2>A. GENERAL POLICY APPROACH</h2>	
A.1. Is there a role for new targets for renewable energy sources post-2020 assuming that any targets must be consistent with climate mitigation and energy efficiency policies and targets as is currently the case with the 20/20/20 targets in the Europe 2020 strategy? -multiple choices reply-(optional)	Yes, a mandatory target at EU level is appropriate
A.1.1. Please explain the reasons for your answer (such as the scope and contribution from GHG targets/ETS, the need to address other environmental, security of supply or technological development benefits) -open reply-(optional)	
Voluntary targets have proven to be ineffective. There are simple cost effective technologies which provide a direct source reduction of GHG emissions in buildings. New targets can be easily applied to new construction at the building permit stage. On-site generation of both electricity and thermal energy can be gradually increased from 20% to higher levels in keeping with proposed programs. Any target, however, must not be restrictive as to renewable energy technologies. Currently the European Union defines solar heating as solar hot water and excludes solar air heating. This is not acceptable and restricts or eliminates proven solar air heating technologies from being used to accomplish the objectives.	
A.2. Are other policy elements necessary to promote renewable energy post-2020, such as: -multiple choices reply-(optional)	Facilitation policies (faster and easier permitting, improved access to the grid and further grid investments, availability of more sites for renewables, etc)
<h2>B. FINANCIAL SUPPORT</h2>	
B.1. Do you consider that financial support will continue to be necessary to support renewables post 2020 given their expected greater penetration? -single choice reply-(optional)	No
B.2. If renewable energy sources require	

support post-2020, how do you think this can best be achieved with a view to achieving a cost-effective deployment? -multiple choices reply-(optional)	
B.3. Do you think it would be useful to develop common approaches as regards Member States' financial support for renewables? -single choice reply-(optional)	No, support levels should be entirely up to Member States
B.4. Should the structure of financial support be gradually aligned EU-wide? -single choice reply-(optional)	N/A
B.5. With regard to questions B.3. and B.4. please specify if you see a difference between the different sectors (electricity, heating and cooling, transport). -open reply-(optional)	
Each sector is different and member states may have specific reasons for either supporting or not supporting certain technologies and they should be free to do so as long as the outcome meets the overall objectives of the EU	
B.6. How do you see the relation between support schemes for renewable energy and the requirements of the internal electricity market for the period after 2020 against the background of a rising share of renewables? -multiple choices reply-(optional)	
B.7. Do national support schemes and differences between such schemes distort competition? -single choice reply-(optional)	Yes, all support schemes distort competition to a similar extent
C. ADMINISTRATIVE PROCEDURES	
C.1. Which of the following issues relating to administrative procedures, information and training do you consider acting as a serious impediment to further growth of renewables following Member States' implementation of the provisions of the Directive? -multiple choices reply-(optional)	Length and complexity of administrative procedures relating to authorisation/certification/licensing
C.1.1. Please provide explanations and specific examples where available -open reply-(optional)	
C.2. Which policy response to the problems identified above do you consider appropriate? -single choice reply-(optional)	N/A
D. GRID INTEGRATION OF ELECTRICITY FROM RENEWABLE ENERGY SOURCES	
D.1. Do you consider that any of the following national rules and framework conditions will still create obstacles to renewable energy	Grid connection rules

production after 2020? -multiple choices reply- (optional)	
D.1.1. Please specify which obstacles and the nature and degree of them for each -open reply-(optional)	
D.2. Which renewables-specific grid related rules do you consider necessary and proportionate in a post-2020 perspective? -multiple choices reply-(optional)	
D.2.1. Please explain why -open reply-(optional)	
D.3. With regard to system integration of wind and solar power, what measures do you consider most important to increase the flexibility reserve of the system: -multiple choices reply-(optional)	Increase availability of demand response (smart grids ...)
E. MARKET INTEGRATION	
E.1. In which of the following ways could renewable energy be made responsive to market signals? -multiple choices reply-(optional)	Price risk - producers of renewable energy should be obliged to sell their production on the market and aid be granted exclusively as a) premiums or b) investment aid
E.2. How can it be ensured that market arrangements reward flexibility? -multiple choices reply-(optional)	
E.3. In how far do you think today's market design needs to be adapted to provide an appropriate framework for renewables -single choice reply-(optional)	N/A
F. RENEWABLES IN HEATING AND COOLING	
F.1. What do you consider to be the main barriers against a stronger uptake of renewable energy in the heating and cooling market beyond 2020? -multiple choices reply-(optional)	Building regulations etc.
F.2. What pathways do you consider to be the most promising for further increasing the share of renewable energy in heating and cooling beyond 2020? -multiple choices reply-(optional)	Solar thermal
F.3. How do you see the interaction of promoting further use of renewable energy in heating and cooling and enhancing energy efficiency in this sector? -open reply-(optional)	
G. RENEWABLES IN TRANSPORT	
G.1. What do you consider to be the main barriers against a stronger uptake of renewable	Costs

energy in transport? -multiple choices reply-(optional)	
G.2. What sectors of transport do you consider to be the most promising for further increasing the share of renewable energy? -multiple choices reply-(optional)	
G.2.1. Please explain your answer -open reply-(optional)	
H. SUSTAINABILITY	
H.1. Do you think that additional sustainability criteria are necessary in the post 2020 period? -multiple choices reply-(optional)	
H.1.1. Please explain -open reply-(optional)	
I. REGIONAL AND INTERNATIONAL DIMENSIONS	
I.1. Do you consider current rules for cooperation between Member States sufficient to fulfil their purpose, i.e. realisation of cost-efficient renewable potential in the EU? -single choice reply-(optional)	No (please specify how they should be amended or which elements added)
Please specify how they should be amended or which elements added -open reply-(optional)	
I.2. Do you think the EU should further facilitate cooperation with third countries when it comes to the development of the potential for renewable energy? -single choice reply-(optional)	Yes, cooperation with third countries should be further promoted (please specify how and with whom, i.e. only neighbouring countries or more widely)
Please specify how and with whom, i.e. only neighbouring countries or more widely -open reply-(optional)	
I.3. Should investments in electricity networks in some Member States (i.e. Spain, Greece, Italy) be prioritized for this purpose? -single choice reply-(optional)	N/A
I.4. Which measures do you consider appropriate and necessary in order to foster cooperation with third countries in this area? -single choice reply-(optional)	N/A
I.5. In its Communication on security of supply and energy cooperation – "The EU Energy Policy: Engaging with Partners beyond our Borders", the European Commission proposes to promote cooperation on renewable energy projects with the Southern Mediterranean countries and to gradually build a renewed EU-Mediterranean energy partnership focus on electricity and renewable energy. How do you consider this should relate with the EU internal renewables policy? What should be the priorities? -open reply-(optional)	

I.6. The possibility to explore regional cooperation and a coordinated, more strategic approach to grid connection for the rapidly growing volume of offshore wind generation in the North Sea is currently being explored in the framework of the North Sea Countries Offshore Grid Initiative (NSCOGI). Do you think such cooperation should be further fostered? What benefits do you think could arise from it? Do you consider that this experience could be generalised and applied elsewhere? -open reply-(optional)

J. TECHNOLOGY DEVELOPMENT

J.1. For a first set of renewable technologies, namely wind, solar, bio-energy, the SET Plan aims at a cost-competitive market roll out of renewable energy by 2020. It also aims at enabling integration of renewable energy into the electricity grid and smart cities and communities. In your view, what would be the remaining key challenges of these technologies to be addressed by research and innovation in view of the 2050 objectives?
-multiple choices reply-(optional)

System integration

J.2. Which additional measures and/or instruments should be developed to address these technologies and their remaining challenges and to ensure that the EU innovation fabric is geared to supporting the significant deployment up to 2050? -open reply-(optional)

J.3. In your point of view, which technologies other than those covered by the current industrial initiatives should be given priority in the post-2020 perspective? Please justify with reference to the criteria mentioned above, i.e. large-scale availability and willingness of industry to engage in public private partnerships?
-open reply-(optional)

J.4. How successful do you consider the existing measures have been and which have been the main drawbacks? -single choice reply-(optional)

Not successful

J.5. Do you consider that assistance in technology development should be linked to a certain result to be achieved by a certain deadline?
-open reply-(optional)

IDENTIFICATION

2. Are you responding to this questionnaire on behalf of /as:
-single choice reply-(optional)

Industry

3. Please indicate your country -single choice reply-(optional)

Romania

4. How would you prefer your contribution to be published on the Commission website, if at all?
-single choice reply-(optional)

Anonymously (I consent to publication of all information in my contribution and I declare that none of it is under copyright restrictions that prevent publication)

A. GENERAL POLICY APPROACH

A.1. Is there a role for new targets for renewable energy sources post-2020 assuming that any targets must be consistent with climate mitigation and energy efficiency policies and targets as is currently the case with the 20/20/20 targets in the Europe 2020 strategy?

-multiple choices reply-(optional)

Yes, a mandatory target at EU level is appropriate

A.1.1. Please explain the reasons for your answer (such as the scope and contribution from GHG targets/ETS, the need to address other environmental, security of supply or technological development benefits) -open reply-(optional)

Voluntary targets have proven to be ineffective. There are simple cost effective technologies which provide a direct source reduction of GHG emissions in buildings. New targets can be easily applied to new construction at the building permit stage. On-site generation of both electricity and thermal energy can be gradually increased from 20% to higher levels in keeping with proposed programs. Any target, however, must not be restrictive as to renewable energy technologies. Currently the European Union defines solar heating as solar hot water and excludes solar air heating. This is not acceptable and restricts or eliminates proven solar air heating technologies from being used to accomplish the objectives.

A.2. Are other policy elements necessary to promote renewable energy post-2020, such as:

-multiple choices reply-(optional)

Facilitation policies (faster and easier permitting, improved access to the grid and further grid investments, availability of more sites for renewables, etc)

B. FINANCIAL SUPPORT

B.1. Do you consider that financial support will continue to be necessary to support renewables post 2020 given their expected greater penetration? -single choice reply-(optional)

No

B.2. If renewable energy sources require support post-2020, how do you think this can best be achieved with a view to achieving a cost-effective deployment? -multiple choices reply-(optional)

Accelerate convergence of national support schemes - Open up national support schemes to cross-border projects

B.3. Do you think it would be useful to develop common approaches as regards Member States' financial support for renewables? -single choice reply-(optional)

No, support levels should be entirely up to Member States

B.4. Should the structure of financial support be gradually aligned EU-wide? -single choice reply-(optional)

N/A

B.5. With regard to questions B.3. and B.4. please specify if you see a difference between the different sectors (electricity, heating and cooling, transport). -open reply-(optional)

Each sector is different and member states may have specific reasons for either supporting or not supporting certain technologies and they should be free to do so as long as the outcome meets the overall objectives of the EU.

B.6. How do you see the relation between support schemes for renewable energy and the requirements of the internal electricity market for

the period after 2020 against the background of a rising share of renewables? -multiple choices reply- (optional)

B.7. Do national support schemes and differences between such schemes distort competition? -single choice reply- (optional)

N/A

C. ADMINISTRATIVE PROCEDURES

C.1. Which of the following issues relating to administrative procedures, information and training do you consider acting as a serious impediment to further growth of renewables following Member States' implementation of the provisions of the Directive? -multiple choices reply- (optional)

Length and complexity of administrative procedures relating to authorisation/certification/licensing - Lack of commonly agreed technical specifications

C.1.1. Please provide explanations and specific examples where available
-open reply- (optional)

Solar thermal collectors eligible for incentives in Europe must have a Solar Keymark but to get Solar Keymark, the collector must be tested to a European test standard. Currently there is no test standard for solar air collectors and thus solar air systems are not eligible. Even worse, the EU has defined solar thermal to only be solar water systems and ignores what happens in other parts of the world where solar air heating is becoming the standard for heating of buildings. The EU and its member countries do not accept test standards or test results from outside the EU. Solar Keymark is a registered trademark of the ESTIF and appears to be designed to promote European technologies to the exclusion of all others. Perhaps EU should look to the International Energy Agency solar heating and cooling program and accept technologies that have been verified and demonstrated at the IEA level rather than only European technologies.

C.2. Which policy response to the problems identified above do you consider appropriate? -single choice reply- (optional)

Other (please specify)

Please specify which would be in your view a workable solution to eliminate barriers -open reply- (optional)

It seems that some policies are hindering existent good alternatives. Why is this not thoroughly understood and applied when making policies?

D. GRID INTEGRATION OF ELECTRICITY FROM RENEWABLE ENERGY SOURCES

D.1. Do you consider that any of the following national rules and framework conditions will still create obstacles to renewable energy production after 2020? -multiple choices reply- (optional)

Grid connection rules - Cost-sharing rules - Balancing rules - Curtailment regime

D.1.1. Please specify which obstacles and the nature and degree of them for each -open reply- (optional)

D.2. Which renewables-specific grid related rules do you consider necessary and proportionate in a post-2020 perspective? -multiple choices reply- (optional)

Obligation for network operator to develop network - Priority or guaranteed access - Priority dispatch and obligation on TSO to counteract curtailment

D.2.1. Please explain why -open reply- (optional)

D.3. With regard to system integration of wind and solar power, what measures do you consider most important to increase the flexibility reserve of the system: -multiple choices reply-(optional)	Increase availability of demand response (smart grids ...) - Accelerate infrastructure development and interconnection - Market-based measures: better use of interconnectors (implicit auctions), trading closer to real time - Enable renewable generators to offer balancing services to TSOs
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E. MARKET INTEGRATION

E.1. In which of the following ways could renewable energy be made responsive to market signals? -multiple choices reply-(optional)	
E.2. How can it be ensured that market arrangements reward flexibility? -multiple choices reply-(optional)	
E.3. In how far do you think today's market design needs to be adapted to provide an appropriate framework for renewables -single choice reply-(optional)	

F. RENEWABLES IN HEATING AND COOLING

F.1. What do you consider to be the main barriers against a stronger uptake of renewable energy in the heating and cooling market beyond 2020? -multiple choices reply-(optional)	Building regulations etc. - Lack of awareness - Lack of suitable information
F.2. What pathways do you consider to be the most promising for further increasing the share of renewable energy in heating and cooling beyond 2020? -multiple choices reply-(optional)	Other (please specify)

Please specify which other pathways -open reply-(optional)

SOLAR THERMAL / SOLAR AIR HEATING

F.3. How do you see the interaction of promoting further use of renewable energy in heating and cooling and enhancing energy efficiency in this sector? -open reply-(optional)

Currently the European Union restricts solar heating to solar hot water and excludes solar air heating. This is why solar space heating has not occurred in the same manner as solar water heating. Eliminating restrictions on solar and other renewable energy technologies will promote the use of better and less expensive systems. Better integration of solar into buildings is also needed where the building surface can generate the necessary energy to heat and cool the building. This is similar to progression of building codes increasing insulation and better windows. Older buildings passively ventilate air from outside to inside. Newer buildings require mandatory fresh-air ventilation due to their tightness. In both instances, outside ambient air must be heated to the indoor set-point. Solar air heating is the simplest and most cost effective way of heating air. However, this must be endorsed by the EU as it has been by countries around the world.

G. RENEWABLES IN TRANSPORT

G.1. What do you consider to be the main barriers against a stronger uptake of renewable energy in transport? -multiple choices reply-(optional)	
G.2. What sectors of transport do you consider	

to be the most promising for further increasing the share of renewable energy? -multiple choices reply-(optional)

G.2.1. Please explain your answer -open reply-(optional)

H. SUSTAINABILITY

H.1. Do you think that additional sustainability criteria are necessary in the post 2020 period? -multiple choices reply-(optional)

Yes, sustainability criteria should apply to both all biomass and fossil fuels

H.1.1. Please explain -open reply-(optional)

Yes, sustainability criteria should apply to both all biomass and fossil fuels

I. REGIONAL AND INTERNATIONAL DIMENSIONS

I.1. Do you consider current rules for cooperation between Member States sufficient to fulfil their purpose, i.e. realisation of cost-efficient renewable potential in the EU? -single choice reply-(optional)

No (please specify how they should be amended or which elements added)

Please specify how they should be amended or which elements added

-open reply-(optional)

Yes, cooperation with third countries should be further promoted (please specify how and with whom, i.e. only neighbouring countries or more widely)

I.2. Do you think the EU should further facilitate cooperation with third countries when it comes to the development of the potential for renewable energy? -single choice reply-(optional)

I.3. Should investments in electricity networks in some Member States (i.e. Spain, Greece, Italy) be prioritized for this purpose? -single choice reply-(optional)

I.4. Which measures do you consider appropriate and necessary in order to foster cooperation with third countries in this area? -single choice reply-(optional)

Agreements between the EU and third countries

I.5. In its Communication on security of supply and energy cooperation – "The EU Energy Policy: Engaging with Partners beyond our Borders", the European Commission proposes to promote cooperation on renewable energy projects with the Southern Mediterranean countries and to gradually build a renewed EU-Mediterranean energy partnership focus on electricity and renewable energy. How do you consider this should relate with the EU internal renewables policy? What should be the priorities? -open reply-(optional)

In its Communication on security of supply and energy cooperation – "The EU Energy Policy: Engaging with Partners beyond our Borders", the European Commission proposes to promote cooperation on renewable energy projects with the Southern Mediterranean countries and to gradually build a renewed EU-Mediterranean energy partnership focus on electricity and renewable energy. How do you consider this should relate with the EU internal renewables policy? What should be the priorities?

I.6. The possibility to explore regional cooperation and a coordinated, more strategic approach to grid connection for the

rapidly growing volume of offshore wind generation in the North Sea is currently being explored in the framework of the North Sea Countries Offshore Grid Initiative (NSCOGI). Do you think such cooperation should be further fostered? What benefits do you think could arise from it? Do you consider that this experience could be generalised and applied elsewhere? -open reply-(optional)

The possibility to explore regional cooperation and a coordinated, more strategic approach to grid connection for the rapidly growing volume of offshore wind generation in the North Sea is currently being explored in the framework of the North Sea Countries Offshore Grid Initiative (NSCOGI). Do you think such cooperation should be further fostered? What benefits do you think could arise from it? Do you consider that this experience could be generalised and applied elsewhere?

J. TECHNOLOGY DEVELOPMENT

J.1. For a first set of renewable technologies, namely wind, solar, bio-energy, the SET Plan aims at a cost-competitive market roll out of renewable energy by 2020. It also aims at enabling integration of renewable energy into the electricity grid and smart cities and communities. In your view, what would be the remaining key challenges of these technologies to be addressed by research and innovation in view of the 2050 objectives?

-multiple choices reply-(optional)

Other (please specify)

Please specify which other key challenges

-open reply-(optional)

Include solar air heating and cooling technologies, not just ones that are sponsored by ESTIF.

J.2. Which additional measures and/or instruments should be developed to address these technologies and their remaining challenges and to ensure that the EU innovation fabric is geared to supporting the significant deployment up to 2050? -open reply-(optional)

Building integrated solar technologies in new construction are less expensive than in retrofit and easy to mandate at the permit stage. Solar air heating for commercial industrial and institutional buildings is widely used around the world but is conspicuously absent from any programs within the EU. If reducing GHG is a real priority, solar air heating must be used.

J.3. In your point of view, which technologies other than those covered by the current industrial initiatives should be given priority in the post-2020 perspective? Please justify with reference to the criteria mentioned above, i.e. large-scale availability and willingness of industry to engage in public private partnerships?

-open reply-(optional)

J.4. How successful do you consider the existing measures have been and which have been the main drawbacks? -single choice reply-(optional)

Not successful

J.5. Do you consider that assistance in technology development should be linked to a certain result to be achieved by a certain deadline?

-open reply-(optional)

This is hard to monitor. A better approach may be to look at the work being done at IEA-SHC and learn from its successes and failures.

IDENTIFICATION

2. Are you responding to this questionnaire on behalf of /as: NGO

-single choice reply-(optional)	
3. Please indicate your country -single choice reply-(optional)	Germany
4. How would you prefer your contribution to be published on the Commission website, if at all? -single choice reply-(optional)	Anonymously (I consent to publication of all information in my contribution and I declare that none of it is under copyright restrictions that prevent publication)
A. GENERAL POLICY APPROACH	
A.1. Is there a role for new targets for renewable energy sources post-2020 assuming that any targets must be consistent with climate mitigation and energy efficiency policies and targets as is currently the case with the 20/20/20 targets in the Europe 2020 strategy? -multiple choices reply-(optional)	Yes, sectoral targets (e.g. electricity, transport, heating and cooling) are appropriate
A.1.1. Please explain the reasons for your answer (such as the scope and contribution from GHG targets/ETS, the need to address other environmental, security of supply or technological development benefits) -open reply-(optional)	
it is necessary that all components regarding the aspects of change in environmental affairs are combined.	
A.2. Are other policy elements necessary to promote renewable energy post-2020, such as: -multiple choices reply-(optional)	Facilitation policies (faster and easier permitting, improved access to the grid and further grid investments, availability of more sites for renewables, etc) - Public procurement obligations in support of renewables - Better financing possibilities
B. FINANCIAL SUPPORT	
B.1. Do you consider that financial support will continue to be necessary to support renewables post 2020 given their expected greater penetration? -single choice reply-(optional)	For selected technologies/circumstances/markets (please specify)
Please specify which technologies/circumstances/markets -open reply-(optional)	
fundamentally the market will show that efficiency of renewable Energy will save money by long term thinking. To give financial support during a starting time and experience will be helpful for new technology but it should be restricted and well approved be contributed to selected projects	
B.2. If renewable energy sources require support post-2020, how do you think this can best be achieved with a view to achieving a cost-effective deployment? -multiple choices reply-(optional)	Making support schemes more market-oriented (please specify how)
Please specify how to make support schemes more market-oriented -open reply-(optional)	
B.3. Do you think it would be useful to develop common approaches as regards Member States' financial support for renewables? -single choice reply-(optional)	Yes, with benchmark values for support level per technology per Member State

B.4. Should the structure of financial support be gradually aligned EU-wide? -single choice reply- (optional)	No
B.5. With regard to questions B.3. and B.4. please specify if you see a difference between the different sectors (electricity, heating and cooling, transport). -open reply-(optional)	
B.6. How do you see the relation between support schemes for renewable energy and the requirements of the internal electricity market for the period after 2020 against the background of a rising share of renewables? -multiple choices reply- (optional)	Member States need to be able to continue to operate support schemes on a national level and retain control over who benefits from national schemes
B.7. Do national support schemes and differences between such schemes distort competition? -single choice reply-(optional)	Yes, all support schemes distort competition to a similar extent
C. ADMINISTRATIVE PROCEDURES	
C.1. Which of the following issues relating to administrative procedures, information and training do you consider acting as a serious impediment to further growth of renewables following Member States' implementation of the provisions of the Directive? -multiple choices reply- (optional)	Length and complexity of administrative procedures relating to authorisation/certification/licensing
C.1.1. Please provide explanations and specific examples where available -open reply-(optional)	
C.2. Which policy response to the problems identified above do you consider appropriate? -single choice reply-(optional)	The approach of the current Directive to lay down a general framework for Member State action is fine
D. GRID INTEGRATION OF ELECTRICITY FROM RENEWABLE ENERGY SOURCES	
D.1. Do you consider that any of the following national rules and framework conditions will still create obstacles to renewable energy production after 2020? -multiple choices reply- (optional)	Cost-sharing rules - Balancing rules
D.1.1. Please specify which obstacles and the nature and degree of them for each -open reply-(optional)	
D.2. Which renewables-specific grid related rules do you consider necessary and proportionate in a post-2020 perspective? -multiple choices reply-(optional)	Obligation for network operator to develop network - Priority or guaranteed access
D.2.1. Please explain why -open reply-(optional)	

D.3. With regard to system integration of wind and solar power, what measures do you consider most important to increase the flexibility reserve of the system: -multiple choices reply-(optional)

Increase flexible back-up capacity (capacity payments ...) -
Increase availability of demand response (smart grids ...)

E. MARKET INTEGRATION

E.1. In which of the following ways could renewable energy be made responsive to market signals? -multiple choices reply-(optional)

Price risk - producers of renewable energy should be obliged to sell their production on the market and aid be granted exclusively as a) premiums or b) investment aid

E.2. How can it be ensured that market arrangements reward flexibility?
-multiple choices reply-(optional)

Dedicated arrangements to reward availability of generation capacity

E.3. In how far do you think today's market design needs to be adapted to provide an appropriate framework for renewables -single choice reply-(optional)

The current wholesale market model based on short-run marginal cost pricing would have to be supplemented by instruments incentivising investment in generation capacities with a high capex/opex ratio (please specify which)

Please specify which instruments incentivising investment -open reply-(optional)

F. RENEWABLES IN HEATING AND COOLING

F.1. What do you consider to be the main barriers against a stronger uptake of renewable energy in the heating and cooling market beyond 2020? -multiple choices reply-(optional)

Costs/lack of financial support - Building regulations etc. - Lack of awareness - Lack of capacity (installers, other)

F.2. What pathways do you consider to be the most promising for further increasing the share of renewable energy in heating and cooling beyond 2020? -multiple choices reply-(optional)

Geothermal - Solar thermal - Other (please specify)

Please specify which other pathways -open reply-(optional)

F.3. How do you see the interaction of promoting further use of renewable energy in heating and cooling and enhancing energy efficiency in this sector? -open reply-(optional)

the builder of each new planned house should propose an individual concept to recreate the energy for heating and colling this new house by an own source. This means thar each new house has the obligation to care for its own heatiung and cooling concept und the use of renewable energy..

G. RENEWABLES IN TRANSPORT

G.1. What do you consider to be the main barriers against a stronger uptake of renewable energy in transport? -multiple choices reply-(optional)

Costs - Lack of infrastructure - Lack of awareness

G.2. What sectors of transport do you consider

Rail - Water

to be the most promising for further increasing the share of renewable energy? -multiple choices reply-(optional)

G.2.1. Please explain your answer -open reply-(optional)

H. SUSTAINABILITY

H.1. Do you think that additional sustainability criteria are necessary in the post 2020 period? -multiple choices reply-(optional)

No, the existing criteria are already burdensome to implement

H.1.1. Please explain -open reply-(optional)

I. REGIONAL AND INTERNATIONAL DIMENSIONS

I.1. Do you consider current rules for cooperation between Member States sufficient to fulfil their purpose, i.e. realisation of cost-efficient renewable potential in the EU? -single choice reply-(optional)

N/A

I.2. Do you think the EU should further facilitate cooperation with third countries when it comes to the development of the potential for renewable energy? -single choice reply-(optional)

No, the EU should first focus on developing its own renewable potential

I.3. Should investments in electricity networks in some Member States (i.e. Spain, Greece, Italy) be prioritized for this purpose? -single choice reply-(optional)

No (explain why)

Please explain why -open reply-(optional)

I.4. Which measures do you consider appropriate and necessary in order to foster cooperation with third countries in this area? -single choice reply-(optional)

Agreements between the EU and third countries

I.5. In its Communication on security of supply and energy cooperation – "The EU Energy Policy: Engaging with Partners beyond our Borders", the European Commission proposes to promote cooperation on renewable energy projects with the Southern Mediterranean countries and to gradually build a renewed EU-Mediterranean energy partnership focus on electricity and renewable energy. How do you consider this should relate with the EU internal renewables policy? What should be the priorities? -open reply-(optional)

I.6. The possibility to explore regional cooperation and a coordinated, more strategic approach to grid connection for the rapidly growing volume of offshore wind generation in the North Sea is currently being explored in the framework of the North Sea Countries Offshore Grid Initiative (NSCOGI). Do you think such cooperation should be further fostered? What benefits do you think could arise from it? Do you consider that this experience could be generalised and applied elsewhere? -open reply-(optional)

J. TECHNOLOGY DEVELOPMENT

J.1. For a first set of renewable technologies, namely wind, solar, bio-energy, the SET Plan aims at a cost-competitive market roll out of renewable energy by 2020. It also aims at enabling integration of renewable energy into the electricity grid and smart cities and communities. In your view, what would be the remaining key challenges of these technologies to be addressed by research and innovation in view of the 2050 objectives?

-multiple choices reply-(optional)

Technology performance and cost-competitiveness - System integration

J.2. Which additional measures and/or instruments should be developed to address these technologies and their remaining challenges and to ensure that the EU innovation fabric is geared to supporting the significant deployment up to 2050? -open reply-(optional)

J.3. In your point of view, which technologies other than those covered by the current industrial initiatives should be given priority in the post-2020 perspective? Please justify with reference to the criteria mentioned above, i.e. large-scale availability and willingness of industry to engage in public private partnerships?

-open reply-(optional)

wind and water energy

J.4. How successful do you consider the existing measures have been and which have been the main drawbacks? -single choice reply-

(optional)

N/A

J.5. Do you consider that assistance in technology development should be linked to a certain result to be achieved by a certain deadline?

-open reply-(optional)

IDENTIFICATION

2. Are you responding to this questionnaire on behalf of /as:

-single choice reply-(optional)

NGO

3. Please indicate your country -single choice reply-

(optional)

Bulgaria

4. How would you prefer your contribution to be published on the Commission website, if at all?

-single choice reply-(optional)

Anonymously (I consent to publication of all information in my contribution and I declare that none of it is under copyright restrictions that prevent publication)

A. GENERAL POLICY APPROACH

A.1. Is there a role for new targets for renewable energy sources post-2020 assuming that any targets must be consistent with climate mitigation and energy efficiency policies and targets as is currently the case

Yes, a mandatory target at EU level is appropriate

<p>with the 20/20/20 targets in the Europe 2020 strategy?</p> <p>-multiple choices reply-(optional)</p>	
<p>A.1.1. Please explain the reasons for your answer (such as the scope and contribution from GHG targets/ETS, the need to address other environmental, security of supply or technological development benefits) -open reply-(optional)</p>	
<p>A.2. Are other policy elements necessary to promote renewable energy post-2020, such as:</p> <p>-multiple choices reply-(optional)</p>	<p>Enhanced focus on R&D to bring down the costs of renewables technologies - Facilitation policies (faster and easier permitting, improved access to the grid and further grid investments, availability of more sites for renewables, etc) - Abolition of support mechanism or subsidies to other energy sources - Public procurement obligations in support of renewables</p>
<p>B. FINANCIAL SUPPORT</p>	
<p>B.1. Do you consider that financial support will continue to be necessary to support renewables post 2020 given their expected greater penetration? -single choice reply-(optional)</p>	<p>Yes</p>
<p>B.2. If renewable energy sources require support post-2020, how do you think this can best be achieved with a view to achieving a cost-effective deployment? -multiple choices reply-(optional)</p>	<p>Making support schemes more market-oriented (please specify how)</p>
<p>Please specify how to make support schemes more market-oriented -open reply-(optional)</p>	
<p>B.3. Do you think it would be useful to develop common approaches as regards Member States' financial support for renewables? -single choice reply-(optional)</p>	<p>No, support levels should be entirely up to Member States</p>
<p>B.4. Should the structure of financial support be gradually aligned EU-wide? -single choice reply-(optional)</p>	<p>Yes (please explain how this could be achieved and which support structure you consider most suitable)</p>
<p>Please explain how this could be achieved and which support structure you consider most suitable -open reply-(optional)</p>	
<p>One and the same supporting scheme in the EU so that it would be recognizable among the investors Europewide.</p>	
<p>B.5. With regard to questions B.3. and B.4. please specify if you see a difference between the different sectors (electricity, heating and cooling, transport). -open reply-(optional)</p>	
<p>B.6. How do you see the relation between support schemes for renewable energy and the requirements of the internal electricity market for the period after 2020 against the background of a rising share of renewables? -multiple choices reply-(optional)</p>	<p>Member States need to open their support schemes to renewable generation from other Member States</p>

Please explain how this could be achieved for other Member States (e.g. through convergence of national schemes, compensation mechanisms or other)

-open reply-(optional)

B.7. Do national support schemes and differences between such schemes distort competition? -single choice reply-(optional)

Yes, some support schemes are more distorting than others (please specify which you consider most distorting)

Please specify which support schemes you consider most distorting -open reply-(optional)

The unified feed-in-tariff is the best of the possible and existing support schemes.

C. ADMINISTRATIVE PROCEDURES

C.1. Which of the following issues relating to administrative procedures, information and training do you consider acting as a serious impediment to further growth of renewables following Member States' implementation of the provisions of the Directive? -multiple choices reply-(optional)

Length and complexity of administrative procedures relating to authorisation/certification/licensing - Lack of commonly agreed technical specifications - Lack of information on support schemes or other - Lack of credible and certified training and qualification

C.1.1. Please provide explanations and specific examples where available

-open reply-(optional)

C.2. Which policy response to the problems identified above do you consider appropriate? -single choice reply-(optional)

Strengthen rules to intrude more directly into Member States procedures in terms of roles of different actors (e.g. one-stop-shop), maximum time-frame or other

D. GRID INTEGRATION OF ELECTRICITY FROM RENEWABLE ENERGY SOURCES

D.1. Do you consider that any of the following national rules and framework conditions will still create obstacles to renewable energy production after 2020? -multiple choices reply-(optional)

Grid connection rules - Cost-sharing rules - Balancing rules - Curtailment regime

D.1.1. Please specify which obstacles and the nature and degree of them for each -open reply-(optional)

D.2. Which renewables-specific grid related rules do you consider necessary and proportionate in a post-2020 perspective? -multiple choices reply-(optional)

Obligation for network operator to develop network - Priority or guaranteed access - Priority dispatch and obligation on TSO to counteract curtailment

D.2.1. Please explain why -open reply-(optional)

D.3. With regard to system integration of wind and solar power, what measures do you consider most important to increase the

Increase availability of demand response (smart grids ...) - Accelerate infrastructure development and interconnection - Market-based measures: better use of interconnectors (implicit

flexibility reserve of the system: -multiple choices reply-(optional)	auctions), trading closer to real time - Increased availability of storage
E. MARKET INTEGRATION	
E.1. In which of the following ways could renewable energy be made responsive to market signals? -multiple choices reply-(optional)	Price risk - producers of renewable energy should be obliged to sell their production on the market and aid be granted exclusively as a) premiums or b) investment aid
E.2. How can it be ensured that market arrangements reward flexibility? -multiple choices reply-(optional)	Dedicated arrangements to reward availability of generation capacity - Favourable regulatory treatment of storage operators - Develop demand response to market signals (please specify, e.g. smart grids, smart meters, demand aggregation, interruptible demand)
Develop demand response to market signals : please specify, e.g. smart grids, smart meters, demand aggregation, interruptible demand -open reply-(optional)	
E.3. In how far do you think today's market design needs to be adapted to provide an appropriate framework for renewables -single choice reply-(optional)	Wholesale markets would have to move to reflecting full costs
F. RENEWABLES IN HEATING AND COOLING	
F.1. What do you consider to be the main barriers against a stronger uptake of renewable energy in the heating and cooling market beyond 2020? -multiple choices reply-(optional)	Costs/lack of financial support - Building regulations etc. - Lack of awareness - Lack of suitable information - Lack of public support - Lack of capacity (installers, other)
F.2. What pathways do you consider to be the most promising for further increasing the share of renewable energy in heating and cooling beyond 2020? -multiple choices reply-(optional)	Solar thermal
F.3. How do you see the interaction of promoting further use of renewable energy in heating and cooling and enhancing energy efficiency in this sector? -open reply-(optional)	
G. RENEWABLES IN TRANSPORT	
G.1. What do you consider to be the main barriers against a stronger uptake of renewable energy in transport? -multiple choices reply-(optional)	Costs - Pace of technology development - Lack of standards - Limits of availability of sustainably produced biofuels
G.2. What sectors of transport do you consider to be the most promising for further increasing the share of renewable energy? -multiple choices reply-(optional)	Road for passengers - Rail

G.2.1. Please explain your answer -open reply-(optional)

H. SUSTAINABILITY

H.1. Do you think that additional sustainability criteria are necessary in the post 2020 period?

-multiple choices reply-(optional)

Yes, sustainability criteria should apply to both all biomass and fossil fuels

H.1.1. Please explain -open reply-(optional)

I. REGIONAL AND INTERNATIONAL DIMENSIONS

I.1. Do you consider current rules for cooperation between Member States sufficient to fulfil their purpose, i.e. realisation of cost-efficient renewable potential in the EU?

-single choice reply-(optional)

No (please specify how they should be amended or which elements added)

Please specify how they should be amended or which elements added

-open reply-(optional)

I.2. Do you think the EU should further facilitate cooperation with third countries when it comes to the development of the potential for renewable energy? -single choice reply-(optional)

No, the EU should first focus on developing its own renewable potential

I.3. Should investments in electricity networks in some Member States (i.e. Spain, Greece, Italy) be prioritized for this purpose? -single choice reply-

(optional)

No (explain why)

Please explain why -open reply-(optional)

I.4. Which measures do you consider appropriate and necessary in order to foster cooperation with third countries in this area?

-single choice reply-(optional)

Agreements between the EU and third countries

I.5. In its Communication on security of supply and energy cooperation – "The EU Energy Policy: Engaging with Partners beyond our Borders", the European Commission proposes to promote cooperation on renewable energy projects with the Southern Mediterranean countries and to gradually build a renewed EU-Mediterranean energy partnership focus on electricity and renewable energy. How do you consider this should relate with the EU internal renewables policy? What should be the priorities? -open reply-(optional)

I.6. The possibility to explore regional cooperation and a coordinated, more strategic approach to grid connection for the rapidly growing volume of offshore wind generation in the North Sea is currently being explored in the framework of the North Sea Countries Offshore Grid Initiative (NSCOGI). Do you think such cooperation should be further fostered? What benefits do you think could arise from it? Do you consider that this experience could be generalised and applied elsewhere? -open reply-(optional)

J. TECHNOLOGY DEVELOPMENT

J.1. For a first set of renewable technologies, namely wind, solar, bio-energy, the SET Plan aims at a cost-competitive market roll out of renewable energy by 2020. It also aims at enabling integration of renewable energy into the electricity grid and smart cities and communities. In your view, what would be the remaining key challenges of these technologies to be addressed by research and innovation in view of the 2050 objectives?

-multiple choices reply-(optional)

Technology performance and cost-competitiveness - System integration

J.2. Which additional measures and/or instruments should be developed to address these technologies and their remaining challenges and to ensure that the EU innovation fabric is geared to supporting the significant deployment up to 2050? -open reply-(optional)

J.3. In your point of view, which technologies other than those covered by the current industrial initiatives should be given priority in the post-2020 perspective? Please justify with reference to the criteria mentioned above, i.e. large-scale availability and willingness of industry to engage in public private partnerships?

-open reply-(optional)

J.4. How successful do you consider the existing measures have been and which have been the main drawbacks? -single choice reply-(optional)

Successful but some drawbacks (please specify which)

Please specify which drawbacks -open reply-(optional)

J.5. Do you consider that assistance in technology development should be linked to a certain result to be achieved by a certain deadline?

-open reply-(optional)

IDENTIFICATION

2. Are you responding to this questionnaire on behalf of /as:

-single choice reply-(optional)

Industry

3. Please indicate your country -single choice reply-(optional)

Hungary

4. How would you prefer your contribution to be published on the Commission website, if at all?

-single choice reply-(optional)

Anonymously (I consent to publication of all information in my contribution and I declare that none of it is under copyright restrictions that prevent publication)

A. GENERAL POLICY APPROACH

A.1. Is there a role for new targets for renewable

Yes, a mandatory target at EU level is appropriate

energy sources post-2020 assuming that any targets must be consistent with climate mitigation and energy efficiency policies and targets as is currently the case with the 20/20/20 targets in the Europe 2020 strategy? -multiple choices reply-(optional)	
A.1.1. Please explain the reasons for your answer (such as the scope and contribution from GHG targets/ETS, the need to address other environmental, security of supply or technological development benefits) -open reply-(optional)	
Without any target and correct numbers the good purpose can turn to wrong way. Eg. health trees burned as biomass to reach the targets. All target can be declared, obligated and controlled.	
A.2. Are other policy elements necessary to promote renewable energy post-2020, such as: -multiple choices reply-(optional)	Enhanced focus on R&D to bring down the costs of renewables technologies - Facilitation policies (faster and easier permitting, improved access to the grid and further grid investments, availability of more sites for renewables, etc) - Better financing possibilities
B. FINANCIAL SUPPORT	
B.1. Do you consider that financial support will continue to be necessary to support renewables post 2020 given their expected greater penetration? -single choice reply-(optional)	For selected technologies/circumstances/markets (please specify)
Please specify which technologies/circumstances/markets -open reply-(optional)	
Hydrogen plants from renewable energy (totally clean technology) fuel cells public sector houses - insulations	
B.2. If renewable energy sources require support post-2020, how do you think this can best be achieved with a view to achieving a cost-effective deployment? -multiple choices reply-(optional)	Open up national support schemes to cross-border projects
B.3. Do you think it would be useful to develop common approaches as regards Member States' financial support for renewables? -single choice reply-(optional)	No, support levels should be entirely up to Member States
B.4. Should the structure of financial support be gradually aligned EU-wide? -single choice reply-(optional)	N/A
B.5. With regard to questions B.3. and B.4. please specify if you see a difference between the different sectors (electricity, heating and cooling, transport). -open reply-(optional)	
B.6. How do you see the relation between support schemes for renewable energy and the requirements of the internal electricity market for the period after 2020 against the background of a rising share of renewables? -multiple choices reply-(optional)	Member States need to be able to continue to operate support schemes on a national level and retain control over who benefits from national schemes

B.7. Do national support schemes and differences between such schemes distort competition? -single choice reply-(optional)	Yes, some support schemes are more distorting than others (please specify which you consider most distorting)
Please specify which support schemes you consider most distorting -open reply-(optional)	
The ROI of the supported technologies seems better than the real market.	
<h2>C. ADMINISTRATIVE PROCEDURES</h2>	
C.1. Which of the following issues relating to administrative procedures, information and training do you consider acting as a serious impediment to further growth of renewables following Member States' implementation of the provisions of the Directive? -multiple choices reply-(optional)	Length and complexity of administrative procedures relating to authorisation/certification/licensing
C.1.1. Please provide explanations and specific examples where available -open reply-(optional)	
Solar thermal collectors eligible for incentives in Europe must have a Solar Keymark but to get Solar Keymark, the collector must be tested to a European test standard. Currently there is no test standard for solar air collectors and thus solar air systems are not eligible. Even worse, the EU has defined solar thermal to only be solar water systems and ignores what happens in other parts of the world where solar air heating is becoming the standard for heating of buildings.	
C.2. Which policy response to the problems identified above do you consider appropriate? -single choice reply-(optional)	N/A
<h2>D. GRID INTEGRATION OF ELECTRICITY FROM RENEWABLE ENERGY SOURCES</h2>	
D.1. Do you consider that any of the following national rules and framework conditions will still create obstacles to renewable energy production after 2020? -multiple choices reply-(optional)	Cost-sharing rules - Curtailment regime
D.1.1. Please specify which obstacles and the nature and degree of them for each -open reply-(optional)	
- the green energy fluctuating -> solution H2 - the consumers have to pay higher electricity price to cover the investors cost and supports	
D.2. Which renewables-specific grid related rules do you consider necessary and proportionate in a post-2020 perspective? -multiple choices reply-(optional)	
D.2.1. Please explain why -open reply-(optional)	
D.3. With regard to system integration of wind and solar power, what measures do you consider most important to increase the flexibility reserve of the system: -multiple choices reply-(optional)	

E. MARKET INTEGRATION

E.1. In which of the following ways could renewable energy be made responsive to market signals? -multiple choices reply-(optional)

E.2. How can it be ensured that market arrangements reward flexibility?

-multiple choices reply-(optional)

E.3. In how far do you think today's market design needs to be adapted to provide an appropriate framework for renewables -single

choice reply-(optional)

F. RENEWABLES IN HEATING AND COOLING

F.1. What do you consider to be the main barriers against a stronger uptake of renewable energy in the heating and cooling market beyond 2020? -multiple choices reply-(optional)

Building regulations etc. - Lack of awareness

F.2. What pathways do you consider to be the most promising for further increasing the share of renewable energy in heating and cooling beyond 2020? -multiple choices reply-(optional)

Solar thermal - Electrification together with higher share of renewables in electricity production - Other (please specify)

Please specify which other pathways -open reply-(optional)

The renewable energy storage technologies! Stirling LTDs for solar cooling Cheaper ab/adsorption coolers for solar cooling

F.3. How do you see the interaction of promoting further use of renewable energy in heating and cooling and enhancing energy efficiency in this sector? -open reply-(optional)

Currently the European Union restricts solar heating to solar hot water and excludes solar air heating. This is why solar space heating has not occurred in the same manner as solar water heating. Eliminating restrictions on solar and other renewable energy technologies will promote the use of better and less expensive systems. Better integration of solar into buildings is also needed where the building surface can generate the necessary energy to heat and cool the building.

G. RENEWABLES IN TRANSPORT

G.1. What do you consider to be the main barriers against a stronger uptake of renewable energy in transport? -multiple choices reply-(optional)

G.2. What sectors of transport do you consider to be the most promising for further increasing the share of renewable energy? -multiple choices

reply-(optional)

G.2.1. Please explain your answer -open reply-(optional)

H. SUSTAINABILITY

H.1. Do you think that additional sustainability criteria are necessary in the post 2020 period?

-multiple choices reply-(optional)

Yes, sustainability criteria should apply to both all biomass and fossil fuels

H.1.1. Please explain -open reply-(optional)

Biomass is still burning of a fuel. If biomass is to be included, it must be from a waste source and not taken away from food producing land.

I. REGIONAL AND INTERNATIONAL DIMENSIONS

I.1. Do you consider current rules for cooperation between Member States sufficient to fulfil their purpose, i.e. realisation of cost-efficient renewable potential in the EU?

-single choice reply-(optional)

I.2. Do you think the EU should further facilitate cooperation with third countries when it comes to the development of the potential for renewable energy? -single choice reply-(optional)

I.3. Should investments in electricity networks in some Member States (i.e. Spain, Greece, Italy) be prioritized for this purpose? -single choice reply-(optional)

I.4. Which measures do you consider appropriate and necessary in order to foster cooperation with third countries in this area?

-single choice reply-(optional)

Agreements between the EU and third countries

I.5. In its Communication on security of supply and energy cooperation – "The EU Energy Policy: Engaging with Partners beyond our Borders", the European Commission proposes to promote cooperation on renewable energy projects with the Southern Mediterranean countries and to gradually build a renewed EU-Mediterranean energy partnership focus on electricity and renewable energy. How do you consider this should relate with the EU internal renewables policy? What should be the priorities? -open reply-(optional)

Different environment - different policy

I.6. The possibility to explore regional cooperation and a coordinated, more strategic approach to grid connection for the rapidly growing volume of offshore wind generation in the North Sea is currently being explored in the framework of the North Sea Countries Offshore Grid Initiative (NSCOGI). Do you think such cooperation should be further fostered? What benefits do you think could arise from it? Do you consider that this experience could be generalised and applied elsewhere? -open reply-(optional)

J. TECHNOLOGY DEVELOPMENT

J.1. For a first set of renewable technologies, namely wind, solar, bio-energy, the SET Plan aims at a cost-competitive market roll out of renewable energy by 2020. It also aims at enabling integration of renewable energy into the electricity grid and smart cities and communities. In your view, what would be the remaining key challenges of these technologies to be addressed by research and innovation in view of the 2050 objectives?

-multiple choices reply-(optional)

J.2. Which additional measures and/or instruments should be developed to address these technologies and their remaining challenges and to ensure that the EU innovation fabric is geared to supporting the significant deployment up to

2050? -open reply-(optional)	
Green energy storage and transportation	
J.3. In your point of view, which technologies other than those covered by the current industrial initiatives should be given priority in the post-2020 perspective? Please justify with reference to the criteria mentioned above, i.e. large-scale availability and willingness of industry to engage in public private partnerships? -open reply-(optional)	
Solar air heating technology.	
J.4. How successful do you consider the existing measures have been and which have been the main drawbacks? -single choice reply-(optional)	N/A
J.5. Do you consider that assistance in technology development should be linked to a certain result to be achieved by a certain deadline? -open reply-(optional)	

IDENTIFICATION	
2. Are you responding to this questionnaire on behalf of /as: -single choice reply-(optional)	Industry
3. Please indicate your country -single choice reply-(optional)	France
4. How would you prefer your contribution to be published on the Commission website, if at all? -single choice reply-(optional)	Anonymously (I consent to publication of all information in my contribution and I declare that none of it is under copyright restrictions that prevent publication)
A. GENERAL POLICY APPROACH	
A.1. Is there a role for new targets for renewable energy sources post-2020 assuming that any targets must be consistent with climate mitigation and energy efficiency policies and targets as is currently the case with the 20/20/20 targets in the Europe 2020 strategy? -multiple choices reply-(optional)	Yes, a mandatory target at EU level is appropriate
A.1.1. Please explain the reasons for your answer (such as the scope and contribution from GHG targets/ETS, the need to address other environmental, security of supply or technological development benefits) -open reply-(optional)	
Voluntary targets have proven to be ineffective. There are simple cost effective technologies which provide a direct source reduction of GHG emissions in buildings. New targets can be easily applied to new construction at the building permit stage. On-site generation of both electricity and thermal energy can be gradually increased from 20% to higher levels in keeping with proposed programs. Any target, however, must not be restrictive as to renewable energy technologies. Currently the European Union defines solar heating as solar hot water and excludes solar air heating. This is not acceptable and restricts or eliminates proven solar air heating technologies from being used to accomplish the objectives.	
A.2. Are other policy elements necessary to promote renewable energy post-2020, such as: -multiple choices reply-(optional)	Facilitation policies (faster and easier permitting, improved access to the grid and further grid investments, availability of more sites

	for renewables, etc)
B. FINANCIAL SUPPORT	
B.1. Do you consider that financial support will continue to be necessary to support renewables post 2020 given their expected greater penetration? -single choice reply-(optional)	No
B.2. If renewable energy sources require support post-2020, how do you think this can best be achieved with a view to achieving a cost-effective deployment? -multiple choices reply-(optional)	
B.3. Do you think it would be useful to develop common approaches as regards Member States' financial support for renewables? -single choice reply-(optional)	No, support levels should be entirely up to Member States
B.4. Should the structure of financial support be gradually aligned EU-wide? -single choice reply-(optional)	N/A
B.5. With regard to questions B.3. and B.4. please specify if you see a difference between the different sectors (electricity, heating and cooling, transport). -open reply-(optional)	
Each sector is different and member states may have specific reasons for either supporting or not supporting certain technologies and they should be free to do so as long as the outcome meets the overall objectives of the EU.	
B.6. How do you see the relation between support schemes for renewable energy and the requirements of the internal electricity market for the period after 2020 against the background of a rising share of renewables? -multiple choices reply-(optional)	
B.7. Do national support schemes and differences between such schemes distort competition? -single choice reply-(optional)	Yes, some support schemes are more distorting than others (please specify which you consider most distorting)
Please specify which support schemes you consider most distorting -open reply-(optional)	
Support for Photovoltaic produced electricity is an investment proposition which in many cases does not reduce GHG emissions (such as in France where >80% of electricity comes from Nuclear). Furthermore, this removes the available capital from technologies which are lower in cost such as solar air heating.	
C. ADMINISTRATIVE PROCEDURES	
C.1. Which of the following issues relating to administrative procedures, information and training do you consider acting as a serious impediment to further growth of renewables following Member States' implementation of the provisions of the Directive? -multiple choices reply-(optional)	Length and complexity of administrative procedures relating to authorisation/certification/licensing - Lack of commonly agreed technical specifications

C.1.1. Please provide explanations and specific examples where available

-open reply-(optional)

Solar thermal collectors eligible for incentives in Europe must have a Solar Keymark but to get Solar Keymark, the collector must be tested to a European test standard. Currently there is no test standard for solar air collectors and thus solar air systems are not eligible. Even worse, the EU has defined solar thermal to only be solar water systems and ignores what happens in other parts of the world where solar air heating is becoming the standard for heating of buildings. The EU and its member countries do not accept test standards or test results from outside the EU. Solar Keymark is a registered trademark of the ESTIF and appears to be designed to promote European technologies to the exclusion of all others. Perhaps EU should look to the International Energy Agency solar heating and cooling program and accept technologies that have been verified and demonstrated at the IEA level rather than only European technologies.

C.2. Which policy response to the problems identified above do you consider appropriate?

-single choice reply-(optional)

Other (please specify)

Please specify which would be in your view a workable solution to eliminate barriers -open reply-(optional)

D. GRID INTEGRATION OF ELECTRICITY FROM RENEWABLE ENERGY SOURCES

D.1. Do you consider that any of the following national rules and framework conditions will still create obstacles to renewable energy production after 2020? -multiple choices reply-

(optional)

D.1.1. Please specify which obstacles and the nature and degree of them for each -open reply-(optional)

D.2. Which renewables-specific grid related rules do you consider necessary and proportionate in a post-2020 perspective?

-multiple choices reply-(optional)

D.2.1. Please explain why -open reply-(optional)

D.3. With regard to system integration of wind and solar power, what measures do you consider most important to increase the flexibility reserve of the system: -multiple choices reply-(optional)

E. MARKET INTEGRATION

E.1. In which of the following ways could renewable energy be made responsive to market signals? -multiple choices reply-(optional)

E.2. How can it be ensured that market arrangements reward flexibility?

-multiple choices reply-(optional)

E.3. In how far do you think today's market design needs to be adapted to provide an appropriate framework for renewables -single

choice reply-(optional)

F. RENEWABLES IN HEATING AND COOLING

F.1. What do you consider to be the main barriers against a stronger uptake of renewable energy in the heating and cooling market beyond 2020? -multiple choices reply-(optional)

Building regulations etc. - Lack of awareness

F.2. What pathways do you consider to be the most promising for further increasing the share of renewable energy in heating and cooling beyond 2020? -multiple choices reply-(optional)

Solar thermal - Other (please specify)

Please specify which other pathways -open reply-(optional)

Solar thermal AIR heating.

F.3. How do you see the interaction of promoting further use of renewable energy in heating and cooling and enhancing energy efficiency in this sector? -open reply-(optional)

Currently the European Union restricts solar heating to solar hot water and excludes solar air heating. This is why solar space heating has not occurred in the same manner as solar water heating. Eliminating restrictions on solar and other renewable energy technologies will promote the use of better and less expensive systems. Better integration of solar into buildings is also needed where the building surface can generate the necessary energy to heat and cool the building. This is similar to progression of building codes increasing insulation and better windows. Older buildings passively ventilate air from outside to inside. Newer buildings require mandatory fresh-air ventilation due to their tightness. In both instances, outside ambient air must be heated to the indoor set-point. Solar air heating is the simplest and most cost effective way of heating air. However, this must be endorsed by the EU as it has been by countries around the world.

G. RENEWABLES IN TRANSPORT

G.1. What do you consider to be the main barriers against a stronger uptake of renewable energy in transport? -multiple choices reply-(optional)

G.2. What sectors of transport do you consider to be the most promising for further increasing the share of renewable energy? -multiple choices reply-(optional)

G.2.1. Please explain your answer -open reply-(optional)

H. SUSTAINABILITY

H.1. Do you think that additional sustainability criteria are necessary in the post 2020 period? -multiple choices reply-(optional)

Yes, sustainability criteria should apply to both all biomass and fossil fuels

H.1.1. Please explain -open reply-(optional)

Biomass is still burning of a fuel. If biomass is to be included, it must be from a waste source and not take away from food producing land.

I. REGIONAL AND INTERNATIONAL DIMENSIONS

I.1. Do you consider current rules for cooperation between Member States sufficient to fulfil their purpose, i.e. realisation of

No (please specify how they should be amended or which elements added)

cost-efficient renewable potential in the EU?

-single choice reply-(optional)

Please specify how they should be amended or which elements added

-open reply-(optional)

I.2. Do you think the EU should further facilitate cooperation with third countries when it comes to the development of the potential for renewable energy? -single choice reply-(optional)

Yes, cooperation with third countries should be further promoted (please specify how and with whom, i.e. only neighbouring countries or more widely)

Please specify how and with whom, i.e. only neighbouring countries or more widely -open reply-(optional)

I.3. Should investments in electricity networks in some Member States (i.e. Spain, Greece, Italy) be prioritized for this purpose? -single choice reply-(optional)

I.4. Which measures do you consider appropriate and necessary in order to foster cooperation with third countries in this area?

-single choice reply-(optional)

Agreements between the EU and third countries

I.5. In its Communication on security of supply and energy cooperation – "The EU Energy Policy: Engaging with Partners beyond our Borders", the European Commission proposes to promote cooperation on renewable energy projects with the Southern Mediterranean countries and to gradually build a renewed EU-Mediterranean energy partnership focus on electricity and renewable energy. How do you consider this should relate with the EU internal renewables policy? What should be the priorities? -open reply-(optional)

Most countries in Europe must heat their buildings in winter. A cooperation with Southern Mediterranean may be okay for electricity but will do nothing for space heating or process heating. EU needs a separate policy for space heating and cooling of its buildings.

I.6. The possibility to explore regional cooperation and a coordinated, more strategic approach to grid connection for the rapidly growing volume of offshore wind generation in the North Sea is currently being explored in the framework of the North Sea Countries Offshore Grid Initiative (NSCOGI). Do you think such cooperation should be further fostered? What benefits do you think could arise from it? Do you consider that this experience could be generalised and applied elsewhere? -open reply-(optional)

J. TECHNOLOGY DEVELOPMENT

J.1. For a first set of renewable technologies, namely wind, solar, bio-energy, the SET Plan aims at a cost-competitive market roll out of renewable energy by 2020. It also aims at enabling integration of renewable energy into the electricity grid and smart cities and communities. In your view, what would be the remaining key challenges of these technologies to be addressed by research and innovation in view of the 2050 objectives?

-multiple choices reply-(optional)

Other (please specify)

Please specify which other key challenges

-open reply-(optional)

J.2. Which additional measures and/or instruments should be developed to address these technologies and their remaining challenges and to ensure that the EU innovation fabric is geared to supporting the significant deployment up to 2050? -open reply-(optional)

Include solar air heating and cooling technologies, not just ones that are sponsored by ESTIF.

J.3. In your point of view, which technologies other than those covered by the current industrial initiatives should be given priority in the post-2020 perspective? Please justify with reference to the criteria mentioned above, i.e. large-scale availability and willingness of industry to engage in public private partnerships?

-open reply-(optional)

Building integrated solar technologies in new construction are less expensive than in retrofit and easy to mandate at the permit stage. Solar air heating for commercial industrial and institutional buildings is widely used around the world but is conspicuously absent from any programs within the EU. If reducing GHG is a real priority, solar air heating must be used.

J.4. How successful do you consider the existing measures have been and which have been the main drawbacks? -single choice reply-(optional)

Not successful

J.5. Do you consider that assistance in technology development should be linked to a certain result to be achieved by a certain deadline?

-open reply-(optional)

This is hard to monitor. A better approach may be to look at the work being done at IEA-SHC and learn from its successes and failures.

IDENTIFICATION

2. Are you responding to this questionnaire on behalf of /as:

-single choice reply-(optional)

Industry

3. Please indicate your country -single choice reply-(optional)

France

4. How would you prefer your contribution to be published on the Commission website, if at all?

-single choice reply-(optional)

Anonymously (I consent to publication of all information in my contribution and I declare that none of it is under copyright restrictions that prevent publication)

A. GENERAL POLICY APPROACH

A.1. Is there a role for new targets for renewable energy sources post-2020 assuming that any targets must be consistent with climate mitigation and energy efficiency policies and targets as is currently the case with the 20/20/20 targets in the Europe 2020 strategy?

-multiple choices reply-(optional)

Yes, a mandatory target at EU level is appropriate

A.1.1. Please explain the reasons for your answer (such as the scope and contribution from GHG targets/ETS, the need to address other environmental, security of supply or technological development benefits) -open reply-(optional)

Voluntary targets have proven to not be effective. New targets can be easily applied to new construction at the building permit stage. On-site generation of both electricity and thermal energy can be gradually increased from 20% to higher levels in keeping with proposed

programs. Any target, however, must not be restrictive as to renewable energy technologies. Currently the European Union defines solar heating as solar hot water and excludes solar air heating. This is not acceptable and restricts or eliminates new technologies from being used to accomplish the objectives.

A.2. Are other policy elements necessary to promote renewable energy post-2020, such as:
-multiple choices reply-(optional)

Facilitation policies (faster and easier permitting, improved access to the grid and further grid investments, availability of more sites for renewables, etc) - Public procurement obligations in support of renewables

B. FINANCIAL SUPPORT

B.1. Do you consider that financial support will continue to be necessary to support renewables post 2020 given their expected greater penetration? -single choice reply-(optional)

No

B.2. If renewable energy sources require support post-2020, how do you think this can best be achieved with a view to achieving a cost-effective deployment? -multiple choices reply-(optional)

B.3. Do you think it would be useful to develop common approaches as regards Member States' financial support for renewables? -single choice reply-(optional)

No, support levels should be entirely up to Member States

B.4. Should the structure of financial support be gradually aligned EU-wide? -single choice reply-(optional)

No

B.5. With regard to questions B.3. and B.4. please specify if you see a difference between the different sectors (electricity, heating and cooling, transport). -open reply-(optional)

Each sector is different and member states may have specific reasons for either supporting or not supporting certain technologies and they should be free to do so as long as the outcome meets the overall objectives of the EU

B.6. How do you see the relation between support schemes for renewable energy and the requirements of the internal electricity market for the period after 2020 against the background of a rising share of renewables? -multiple choices reply-(optional)

B.7. Do national support schemes and differences between such schemes distort competition? -single choice reply-(optional)

Yes, some support schemes are more distorting than others (please specify which you consider most distorting)

Please specify which support schemes you consider most distorting -open reply-(optional)

High payments for solar PV in many countries distort the market in favour of PV over solar thermal. Many buildings now have no space left for solar thermal panels as all of the available space is covered with PV modules. UK has a RHI which excludes solar air heating and only accepts expensive solar water collectors in its payment scheme. Most buildings need to heat the air within the walls so current RHI prevents innovations such as direct solar air heating. A better solution is to set mandatory on site generating targets and not select winners and losers (technologies) as now occurs. The market will decide which technologies are cost effective and which will achieve the goals.

C. ADMINISTRATIVE PROCEDURES

C.1. Which of the following issues relating to administrative procedures, information and training do you consider acting as a serious impediment to further growth of renewables following Member States' implementation of the provisions of the Directive? -multiple choices reply-

(optional)

Length and complexity of administrative procedures relating to authorisation/certification/licensing - Lack of commonly agreed technical specifications

C.1.1. Please provide explanations and specific examples where available

-open reply-(optional)

Solar thermal collectors eligible for incentives in Europe must have a Solar Keymark but to get Solar Keymark, the collector must be tested to a European test standard. Currently there is no test standard for solar air collectors and thus solar air systems are not eligible. Even worse, EU has defined solar thermal to only be solar water systems and ignores what happens in other parts of the world where solar air heating is becoming the standard for heating of buildings. EU and its member countries do not accept test standards or test results from outside the EU. Solar Keymark is a registered trademark of the ESTIF and appears to be designed to promote European technologies to the exclusion of all others. Perhaps EU should look to the International Energy Agency solar heating and cooling program and accept technologies that have been verified and demonstrated at the IEA level rather than only European technologies.

C.2. Which policy response to the problems identified above do you consider appropriate?

-single choice reply-(optional)

Other (please specify)

Please specify which would be in your view a workable solution to eliminate barriers -open reply-(optional)

The approach of the current Directive to lay down a general framework for Member State action is fine but its current definition of solar thermal is incorrect and must first be updated. The UK government justifies its decision to exclude solar air from its RHI by stating in writing that the EU's definition of solar thermal excludes solar air heating.

D. GRID INTEGRATION OF ELECTRICITY FROM RENEWABLE ENERGY SOURCES

D.1. Do you consider that any of the following national rules and framework conditions will still create obstacles to renewable energy production after 2020? -multiple choices reply-

(optional)

D.1.1. Please specify which obstacles and the nature and degree of them for each -open reply-(optional)

D.2. Which renewables-specific grid related rules do you consider necessary and proportionate in a post-2020 perspective?

-multiple choices reply-(optional)

D.2.1. Please explain why -open reply-(optional)

D.3. With regard to system integration of wind and solar power, what measures do you consider most important to increase the flexibility reserve of the system: -multiple choices reply-(optional)

E. MARKET INTEGRATION

E.1. In which of the following ways could renewable energy be made responsive to market signals? -multiple choices reply-(optional)

E.2. How can it be ensured that market arrangements reward flexibility?
-multiple choices reply-(optional)

E.3. In how far do you think today's market design needs to be adapted to provide an appropriate framework for renewables -single choice reply-(optional)

F. RENEWABLES IN HEATING AND COOLING

F.1. What do you consider to be the main barriers against a stronger uptake of renewable energy in the heating and cooling market beyond 2020? -multiple choices reply-(optional)

Building regulations etc. - Lack of awareness - Other (please specify)

Please specify which other barriers -open reply-(optional)

definition of solar thermal is currently incorrect as it only includes systems that heat water and not air.

F.2. What pathways do you consider to be the most promising for further increasing the share of renewable energy in heating and cooling beyond 2020? -multiple choices reply-(optional)

Solar thermal - Other (please specify)

Please specify which other pathways -open reply-(optional)

low cost storage of solar thermal energy is also needed and is possible in new construction by using the thermal mass of a building.

F.3. How do you see the interaction of promoting further use of renewable energy in heating and cooling and enhancing energy efficiency in this sector? -open reply-(optional)

Currently the European Union restricts solar heating to solar hot water and excludes solar air heating. This is why solar space heating has not occurred in the same manner as solar water heating. Eliminating restrictions on solar and other renewable energy technologies will promote the use of better and less expensive systems. Better integration of solar into buildings is also needed where the building surface can generate the necessary energy to heat and cool the building. This is similar to progression of building codes increasing insulation and better windows.

G. RENEWABLES IN TRANSPORT

G.1. What do you consider to be the main barriers against a stronger uptake of renewable energy in transport? -multiple choices reply-(optional)

G.2. What sectors of transport do you consider to be the most promising for further increasing the share of renewable energy? -multiple choices reply-(optional)

G.2.1. Please explain your answer -open reply-(optional)

H. SUSTAINABILITY

<p>H.1. Do you think that additional sustainability criteria are necessary in the post 2020 period?</p> <p>-multiple choices reply-(optional)</p>	<p>Yes, sustainability criteria should apply to both all biomass and fossil fuels</p>
<p>H.1.1. Please explain -open reply-(optional)</p> <p>Biomass is still burning of a fuel. If biomass is to be included, it must be from a waste source and not take away from food producing land.</p>	
<h2>I. REGIONAL AND INTERNATIONAL DIMENSIONS</h2>	
<p>I.1. Do you consider current rules for cooperation between Member States sufficient to fulfil their purpose, i.e. realisation of cost-efficient renewable potential in the EU?</p> <p>-single choice reply-(optional)</p>	<p>No (please specify how they should be amended or which elements added)</p>
<p>Please specify how they should be amended or which elements added</p> <p>-open reply-(optional)</p> <p>as stated above, EU defined solar thermal incorrectly and member states then rely on the wrong definition to justify their mistakes.</p>	
<p>I.2. Do you think the EU should further facilitate cooperation with third countries when it comes to the development of the potential for renewable energy? -single choice reply-(optional)</p>	<p>Yes, cooperation with third countries should be further promoted (please specify how and with whom, i.e. only neighbouring countries or more widely)</p>
<p>Please specify how and with whom, i.e. only neighbouring countries or more widely -open reply-(optional)</p> <p>EU has a narrow focus on only ESTIF approved products. EU must look at North America and other areas to see what they are doing for solar thermal. The IEA is an excellent vehicle to learn what is happening around the world and EU must not ignore the work that IEA does and which is supported by all of the major countries in EU.</p>	
<p>I.3. Should investments in electricity networks in some Member States (i.e. Spain, Greece, Italy) be prioritized for this purpose? -single choice reply-(optional)</p>	
<p>I.4. Which measures do you consider appropriate and necessary in order to foster cooperation with third countries in this area? -single choice reply-(optional)</p>	<p>Agreements between the EU and third countries</p>
<p>I.5. In its Communication on security of supply and energy cooperation – "The EU Energy Policy: Engaging with Partners beyond our Borders", the European Commission proposes to promote cooperation on renewable energy projects with the Southern Mediterranean countries and to gradually build a renewed EU-Mediterranean energy partnership focus on electricity and renewable energy. How do you consider this should relate with the EU internal renewables policy? What should be the priorities? -open reply-(optional)</p> <p>Most countries in Europe must heat their buildings in winter. A cooperation with Southern Mediterranean may be okay for electricity but will do nothing for space heating or process heating. EU needs a separate policy for space heating and cooling of its buildings.</p>	
<p>I.6. The possibility to explore regional cooperation and a coordinated, more strategic approach to grid connection for the rapidly growing volume of offshore wind generation in the North Sea is currently being explored in the framework of the North Sea Countries Offshore Grid Initiative (NSCOGI). Do you think such cooperation should be further fostered? What benefits do you think could arise from it? Do you consider that this experience could be generalised and applied elsewhere? -open reply-(optional)</p>	

J. TECHNOLOGY DEVELOPMENT

J.1. For a first set of renewable technologies, namely wind, solar, bio-energy, the SET Plan aims at a cost-competitive market roll out of renewable energy by 2020. It also aims at enabling integration of renewable energy into the electricity grid and smart cities and communities. In your view, what would be the remaining key challenges of these technologies to be addressed by research and innovation in view of the 2050 objectives?

-multiple choices reply-(optional)

Other (please specify)

Please specify which other key challenges

-open reply-(optional)

One arm of the government spends money on R & D but new technologies that do not meet current definitions are being excluded from inclusion of solar obligations. Germany requires a certain amount of solar thermal but buildings with an active Solar Wall system which heats air cannot count that solar energy towards their obligation. In effect, solar air heating is not considered as a renewable energy technology. More care in defining solar energy must be considered a first priority.

J.2. Which additional measures and/or instruments should be developed to address these technologies and their remaining challenges and to ensure that the EU innovation fabric is geared to supporting the significant deployment up to 2050? -open reply-(optional)

include all solar heating and cooling technologies, not just ones that are sponsored by ESTIF

J.3. In your point of view, which technologies other than those covered by the current industrial initiatives should be given priority in the post-2020 perspective? Please justify with reference to the criteria mentioned above, i.e. large-scale availability and willingness of industry to engage in public private partnerships?

-open reply-(optional)

Building integrated solar technologies in new construction are less expensive than in retrofit and easy to mandate at the permit stage. Solar air heating must be allowed.

J.4. How successful do you consider the existing measures have been and which have been the main drawbacks? -single choice reply-(optional)

Not successful

J.5. Do you consider that assistance in technology development should be linked to a certain result to be achieved by a certain deadline?

-open reply-(optional)

This is hard to monitor. A better approach may be to look at the work being done at IEA-SHC and learn from its successes and failures.

IDENTIFICATION

2. Are you responding to this questionnaire on behalf of /as:

-single choice reply-(optional)

Industry

3. Please indicate your country -single choice reply-(optional)

Spain

4. How would you prefer your contribution to be published on the Commission website, if at all?

-single choice reply-(optional)

Anonymously (I consent to publication of all information in my contribution and I declare that none of it is under copyright restrictions that prevent publication)

A. GENERAL POLICY APPROACH

A.1. Is there a role for new targets for renewable energy sources post-2020 assuming that any targets must be consistent with climate mitigation and energy efficiency policies and targets as is currently the case with the 20/20/20 targets in the Europe 2020 strategy?

-multiple choices reply-(optional)

Yes, a mandatory target at EU level is appropriate

A.1.1. Please explain the reasons for your answer (such as the scope and contribution from GHG targets/ETS, the need to address other environmental, security of supply or technological development benefits) -open reply-(optional)

We need to move the market with binding and achievable targets

A.2. Are other policy elements necessary to promote renewable energy post-2020, such as:

-multiple choices reply-(optional)

Enhanced focus on R&D to bring down the costs of renewables technologies - Facilitation policies (faster and easier permitting, improved access to the grid and further grid investments, availability of more sites for renewables, etc) - Public procurement obligations in support of renewables - Better financing possibilities - Other (please specify)

Please specify which other policy elements? -open reply-(optional)

While we do not think we should abolish the support for all other energy sources, we say that support for fossil fuels should be reduced to minimum or abolished.

B. FINANCIAL SUPPORT

B.1. Do you consider that financial support will continue to be necessary to support renewables post 2020 given their expected greater penetration? -single choice reply-(optional)

For selected technologies/circumstances/markets (please specify)

Please specify which technologies/circumstances/markets -open reply-(optional)

Research and development of new technologies should always be supported, and the implementation (commercialization) of new technologies as well. We would like to mention that decentralized generation of electricity needs special support for its energy saving potential. More mature technologies should be supported progressively less until leaving them independent.

B.2. If renewable energy sources require support post-2020, how do you think this can best be achieved with a view to achieving a cost-effective deployment? -multiple choices reply-

(optional)

Making support schemes more market-oriented (please specify how) - Phase out support schemes over time (please specify for which technologies if applicable)

Please specify how to make support schemes more market-oriented -open reply-(optional)

Please specify for which technologies (if applicable) to phase out support schemes over time

-open reply-(optional)

Support for mature technologies should be phased out, while newer Renewable Energy technology should be supported (R&D, Demonstration projects)

B.3. Do you think it would be useful to develop

common approaches as regards Member States' financial support for renewables? -single choice reply-(optional)	No, support levels should be entirely up to Member States
B.4. Should the structure of financial support be gradually aligned EU-wide? -single choice reply-(optional)	No
B.5. With regard to questions B.3. and B.4. please specify if you see a difference between the different sectors (electricity, heating and cooling, transport). -open reply-(optional)	
B.6. How do you see the relation between support schemes for renewable energy and the requirements of the internal electricity market for the period after 2020 against the background of a rising share of renewables? -multiple choices reply-(optional)	Member States need to be able to continue to operate support schemes on a national level and retain control over who benefits from national schemes
B.7. Do national support schemes and differences between such schemes distort competition? -single choice reply-(optional)	No, support schemes do not have a significant distorting impact on competition
C. ADMINISTRATIVE PROCEDURES	
C.1. Which of the following issues relating to administrative procedures, information and training do you consider acting as a serious impediment to further growth of renewables following Member States' implementation of the provisions of the Directive? -multiple choices reply-(optional)	Length and complexity of administrative procedures relating to authorisation/certification/licensing - Lack of credible and certified training and qualification - Other (please specify)
C.1.1. Please provide explanations and specific examples where available -open reply-(optional)	
Lack of awareness among the general public is a problem in some countries, e.g. Spain.	
C.2. Which policy response to the problems identified above do you consider appropriate? -single choice reply-(optional)	Push for more standardisation and harmonisation on EU level or mutual recognition
D. GRID INTEGRATION OF ELECTRICITY FROM RENEWABLE ENERGY SOURCES	
D.1. Do you consider that any of the following national rules and framework conditions will still create obstacles to renewable energy production after 2020? -multiple choices reply-(optional)	Grid connection rules
D.1.1. Please specify which obstacles and the nature and degree of them for each -open reply-(optional)	
D.2. Which renewables-specific grid related rules do you consider necessary and	Obligation for network operator to develop network - Priority or guaranteed access

proportionate in a post-2020 perspective? -multiple choices reply-(optional)	
D.2.1. Please explain why -open reply-(optional)	
D.3. With regard to system integration of wind and solar power, what measures do you consider most important to increase the flexibility reserve of the system: -multiple choices reply-(optional)	Increase availability of demand response (smart grids ...) - Accelerate infrastructure development and interconnection
<h2>E. MARKET INTEGRATION</h2>	
E.1. In which of the following ways could renewable energy be made responsive to market signals? -multiple choices reply-(optional)	Price risk - producers of renewable energy should be obliged to sell their production on the market and aid be granted exclusively as a) premiums or b) investment aid - Price risk – producers of renewable energy should operate without any aid
E.2. How can it be ensured that market arrangements reward flexibility? -multiple choices reply-(optional)	Develop demand response to market signals (please specify, e.g. smart grids, smart meters, demand aggregation, interruptible demand)
Develop demand response to market signals : please specify, e.g. smart grids, smart meters, demand aggregation, interruptible demand -open reply-(optional)	
Installing smart meters in homes and with continuing development of smart grids, consumers will be able to consume energy more consciously, allowing them to run appliances when cost is low, and sell energy (in case they own a generation system) when the price of electricity is high. This will contribute to matching offer and demand.	
E.3. In how far do you think today's market design needs to be adapted to provide an appropriate framework for renewables -single choice reply-(optional)	Electricity markets should evolve into energy services markets, earning revenues from more than just electricity
<h2>F. RENEWABLES IN HEATING AND COOLING</h2>	
F.1. What do you consider to be the main barriers against a stronger uptake of renewable energy in the heating and cooling market beyond 2020? -multiple choices reply-(optional)	Costs/lack of financial support
F.2. What pathways do you consider to be the most promising for further increasing the share of renewable energy in heating and cooling beyond 2020? -multiple choices reply-(optional)	Electrification together with higher share of renewables in electricity production
F.3. How do you see the interaction of promoting further use of renewable energy in heating and cooling and enhancing energy efficiency in this sector? -open reply-(optional)	
<h2>G. RENEWABLES IN TRANSPORT</h2>	

G.1. What do you consider to be the main barriers against a stronger uptake of renewable energy in transport? -multiple choices reply-(optional)	Costs - Lack of infrastructure
G.2. What sectors of transport do you consider to be the most promising for further increasing the share of renewable energy? -multiple choices reply-(optional)	Road for passengers - Rail
G.2.1. Please explain your answer -open reply-(optional)	
H. SUSTAINABILITY	
H.1. Do you think that additional sustainability criteria are necessary in the post 2020 period? -multiple choices reply-(optional)	
H.1.1. Please explain -open reply-(optional)	
I. REGIONAL AND INTERNATIONAL DIMENSIONS	
I.1. Do you consider current rules for cooperation between Member States sufficient to fulfil their purpose, i.e. realisation of cost-efficient renewable potential in the EU? -single choice reply-(optional)	Yes
I.2. Do you think the EU should further facilitate cooperation with third countries when it comes to the development of the potential for renewable energy? -single choice reply-(optional)	No, the EU should first focus on developing its own renewable potential
I.3. Should investments in electricity networks in some Member States (i.e. Spain, Greece, Italy) be prioritized for this purpose? -single choice reply-(optional)	N/A
I.4. Which measures do you consider appropriate and necessary in order to foster cooperation with third countries in this area? -single choice reply-(optional)	N/A
I.5. In its Communication on security of supply and energy cooperation – "The EU Energy Policy: Engaging with Partners beyond our Borders", the European Commission proposes to promote cooperation on renewable energy projects with the Southern Mediterranean countries and to gradually build a renewed EU-Mediterranean energy partnership focus on electricity and renewable energy. How do you consider this should relate with the EU internal renewables policy? What should be the priorities? -open reply-(optional)	
I.6. The possibility to explore regional cooperation and a coordinated, more strategic approach to grid connection for the rapidly growing volume of offshore wind generation in the North Sea is currently being explored in the framework of the	

North Sea Countries Offshore Grid Initiative (NSCOGI). Do you think such cooperation should be further fostered? What benefits do you think could arise from it? Do you consider that this experience could be generalised and applied elsewhere? -open reply-(optional)

J. TECHNOLOGY DEVELOPMENT

J.1. For a first set of renewable technologies, namely wind, solar, bio-energy, the SET Plan aims at a cost-competitive market roll out of renewable energy by 2020. It also aims at enabling integration of renewable energy into the electricity grid and smart cities and communities. In your view, what would be the remaining key challenges of these technologies to be addressed by research and innovation in view of the 2050 objectives?

-multiple choices reply-(optional)

Technology performance and cost-competitiveness

J.2. Which additional measures and/or instruments should be developed to address these technologies and their remaining challenges and to ensure that the EU innovation fabric is geared to supporting the significant deployment up to 2050? -open reply-(optional)

J.3. In your point of view, which technologies other than those covered by the current industrial initiatives should be given priority in the post-2020 perspective? Please justify with reference to the criteria mentioned above, i.e. large-scale availability and willingness of industry to engage in public private partnerships?

-open reply-(optional)

J.4. How successful do you consider the existing measures have been and which have been the main drawbacks? -single choice reply-(optional)

Very successful, no drawbacks

J.5. Do you consider that assistance in technology development should be linked to a certain result to be achieved by a certain deadline?

-open reply-(optional)

IDENTIFICATION

2. Are you responding to this questionnaire on behalf of /as:

-single choice reply-(optional)

NGO

3. Please indicate your country -single choice reply-(optional)

Italy

4. How would you prefer your contribution to be published on the Commission website, if at all?

-single choice reply-(optional)

Anonymously (I consent to publication of all information in my contribution and I declare that none of it is under copyright restrictions that prevent publication)

A. GENERAL POLICY APPROACH

<p>A.1. Is there a role for new targets for renewable energy sources post-2020 assuming that any targets must be consistent with climate mitigation and energy efficiency policies and targets as is currently the case with the 20/20/20 targets in the Europe 2020 strategy?</p> <p>-multiple choices reply-(optional)</p>	<p>No, targets for renewable energy sources are unnecessary</p>
<p>A.1.1. Please explain the reasons for your answer (such as the scope and contribution from GHG targets/ETS, the need to address other environmental, security of supply or technological development benefits) -open reply-(optional)</p>	
<p>A.2. Are other policy elements necessary to promote renewable energy post-2020, such as:</p> <p>-multiple choices reply-(optional)</p>	
<h2>B. FINANCIAL SUPPORT</h2>	
<p>B.1. Do you consider that financial support will continue to be necessary to support renewables post 2020 given their expected greater penetration? -single choice reply-(optional)</p>	<p>No</p>
<p>B.2. If renewable energy sources require support post-2020, how do you think this can best be achieved with a view to achieving a cost-effective deployment? -multiple choices reply-(optional)</p>	
<p>B.3. Do you think it would be useful to develop common approaches as regards Member States' financial support for renewables? -single choice reply-(optional)</p>	<p>No, support levels should be entirely up to Member States</p>
<p>B.4. Should the structure of financial support be gradually aligned EU-wide? -single choice reply-(optional)</p>	<p>No</p>
<p>B.5. With regard to questions B.3. and B.4. please specify if you see a difference between the different sectors (electricity, heating and cooling, transport). -open reply-(optional)</p>	
<p>B.6. How do you see the relation between support schemes for renewable energy and the requirements of the internal electricity market for the period after 2020 against the background of a rising share of renewables? -multiple choices reply-(optional)</p>	<p>Member States need to be able to continue to operate support schemes on a national level and retain control over who benefits from national schemes</p>
<p>B.7. Do national support schemes and differences between such schemes distort competition? -single choice reply-(optional)</p>	<p>No, support schemes do not have a significant distorting impact on competition</p>
<h2>C. ADMINISTRATIVE PROCEDURES</h2>	
<p>C.1. Which of the following issues relating to</p>	

administrative procedures, information and training do you consider acting as a serious impediment to further growth of renewables following Member States' implementation of the provisions of the Directive? -multiple choices reply- (optional)	
C.1.1. Please provide explanations and specific examples where available -open reply-(optional)	
C.2. Which policy response to the problems identified above do you consider appropriate? -single choice reply-(optional)	N/A
D. GRID INTEGRATION OF ELECTRICITY FROM RENEWABLE ENERGY SOURCES	
D.1. Do you consider that any of the following national rules and framework conditions will still create obstacles to renewable energy production after 2020? -multiple choices reply- (optional)	None of the above
D.1.1. Please specify which obstacles and the nature and degree of them for each -open reply-(optional)	
D.2. Which renewables-specific grid related rules do you consider necessary and proportionate in a post-2020 perspective? -multiple choices reply-(optional)	None of the above
D.2.1. Please explain why -open reply-(optional)	
D.3. With regard to system integration of wind and solar power, what measures do you consider most important to increase the flexibility reserve of the system: -multiple choices reply-(optional)	
E. MARKET INTEGRATION	
E.1. In which of the following ways could renewable energy be made responsive to market signals? -multiple choices reply-(optional)	Price risk – producers of renewable energy should operate without any aid
E.2. How can it be ensured that market arrangements reward flexibility? -multiple choices reply-(optional)	
E.3. In how far do you think today's market design needs to be adapted to provide an appropriate framework for renewables -single choice reply-(optional)	Wholesale markets would have to move to reflecting full costs

F. RENEWABLES IN HEATING AND COOLING

F.1. What do you consider to be the main barriers against a stronger uptake of renewable energy in the heating and cooling market beyond 2020? -multiple choices reply-(optional)	Building regulations etc.
F.2. What pathways do you consider to be the most promising for further increasing the share of renewable energy in heating and cooling beyond 2020? -multiple choices reply-(optional)	Solar thermal
F.3. How do you see the interaction of promoting further use of renewable energy in heating and cooling and enhancing energy efficiency in this sector? -open reply-(optional)	

G. RENEWABLES IN TRANSPORT

G.1. What do you consider to be the main barriers against a stronger uptake of renewable energy in transport? -multiple choices reply-(optional)	
G.2. What sectors of transport do you consider to be the most promising for further increasing the share of renewable energy? -multiple choices reply-(optional)	
G.2.1. Please explain your answer -open reply-(optional)	

H. SUSTAINABILITY

H.1. Do you think that additional sustainability criteria are necessary in the post 2020 period? -multiple choices reply-(optional)	Yes, sustainability criteria should apply to both all biomass and fossil fuels
H.1.1. Please explain -open reply-(optional)	

I. REGIONAL AND INTERNATIONAL DIMENSIONS

I.1. Do you consider current rules for cooperation between Member States sufficient to fulfil their purpose, i.e. realisation of cost-efficient renewable potential in the EU? -single choice reply-(optional)	Yes
I.2. Do you think the EU should further facilitate cooperation with third countries when it comes to the development of the potential for renewable energy? -single choice reply-(optional)	No, the EU should first focus on developing its own renewable potential
I.3. Should investments in electricity networks in some Member States (i.e. Spain, Greece, Italy) be prioritized for this purpose? -single choice reply-(optional)	

I.4. Which measures do you consider appropriate and necessary in order to foster cooperation with third countries in this area?

-single choice reply-(optional)

N/A

I.5. In its Communication on security of supply and energy cooperation – "The EU Energy Policy: Engaging with Partners beyond our Borders", the European Commission proposes to promote cooperation on renewable energy projects with the Southern Mediterranean countries and to gradually build a renewed EU-Mediterranean energy partnership focus on electricity and renewable energy. How do you consider this should relate with the EU internal renewables policy? What should be the priorities? -open reply-(optional)

I.6. The possibility to explore regional cooperation and a coordinated, more strategic approach to grid connection for the rapidly growing volume of offshore wind generation in the North Sea is currently being explored in the framework of the North Sea Countries Offshore Grid Initiative (NSCOGI). Do you think such cooperation should be further fostered? What benefits do you think could arise from it? Do you consider that this experience could be generalised and applied elsewhere? -open reply-(optional)

J. TECHNOLOGY DEVELOPMENT

J.1. For a first set of renewable technologies, namely wind, solar, bio-energy, the SET Plan aims at a cost-competitive market roll out of renewable energy by 2020. It also aims at enabling integration of renewable energy into the electricity grid and smart cities and communities. In your view, what would be the remaining key challenges of these technologies to be addressed by research and innovation in view of the 2050 objectives?

-multiple choices reply-(optional)

Technology performance and cost-competitiveness

J.2. Which additional measures and/or instruments should be developed to address these technologies and their remaining challenges and to ensure that the EU innovation fabric is geared to supporting the significant deployment up to 2050? -open reply-(optional)

J.3. In your point of view, which technologies other than those covered by the current industrial initiatives should be given priority in the post-2020 perspective? Please justify with reference to the criteria mentioned above, i.e. large-scale availability and willingness of industry to engage in public private partnerships?

-open reply-(optional)

J.4. How successful do you consider the existing measures have been and which have been the main drawbacks? -single choice reply-

(optional)

J.5. Do you consider that assistance in technology development should be linked to a certain result to be achieved by a certain deadline?

-open reply-(optional)

IDENTIFICATION

2. Are you responding to this questionnaire on behalf of /as: -single choice reply-(optional)	Industry
3. Please indicate your country -single choice reply-(optional)	Austria
4. How would you prefer your contribution to be published on the Commission website, if at all? -single choice reply-(optional)	Anonymously (I consent to publication of all information in my contribution and I declare that none of it is under copyright restrictions that prevent publication)

A. GENERAL POLICY APPROACH

A.1. Is there a role for new targets for renewable energy sources post-2020 assuming that any targets must be consistent with climate mitigation and energy efficiency policies and targets as is currently the case with the 20/20/20 targets in the Europe 2020 strategy? -multiple choices reply-(optional)	Yes, sectoral targets (e.g. electricity, transport, heating and cooling) are appropriate
A.1.1. Please explain the reasons for your answer (such as the scope and contribution from GHG targets/ETS, the need to address other environmental, security of supply or technological development benefits) -open reply-(optional)	
Based on energy efficiency, important sectors should have targets which have tax consequences if the efficiency levels are not fulfilled.	
A.2. Are other policy elements necessary to promote renewable energy post-2020, such as: -multiple choices reply-(optional)	Abolition of support mechanism or subsidies to other energy sources - Other (please specify)
Please specify which other policy elements? -open reply-(optional)	
Introduce negative tax consequences if efficiency levels for each industry benchmark are not achieved	

B. FINANCIAL SUPPORT

B.1. Do you consider that financial support will continue to be necessary to support renewables post 2020 given their expected greater penetration? -single choice reply-(optional)	Yes
B.2. If renewable energy sources require support post-2020, how do you think this can best be achieved with a view to achieving a cost-effective deployment? -multiple choices reply-(optional)	Accelerate convergence of national support schemes
B.3. Do you think it would be useful to develop common approaches as regards Member States' financial support for renewables? -single choice reply-(optional)	Yes, with EU-wide benchmark values for support level per technology
B.4. Should the structure of financial support be gradually aligned EU-wide? -single choice reply-(optional)	Yes (please explain how this could be achieved and which support structure you consider most suitable)

Please explain how this could be achieved and which support structure you consider most suitable -open reply-(optional)	
- Reduce the number of support structures - Central organisation	
B.5. With regard to questions B.3. and B.4. please specify if you see a difference between the different sectors (electricity, heating and cooling, transport). -open reply-(optional)	
Yes, distinctions have to be made. The main focus should be set on efficiency. The least efficient of each industry should have to pay the most; ==> force to exit.	
B.6. How do you see the relation between support schemes for renewable energy and the requirements of the internal electricity market for the period after 2020 against the background of a rising share of renewables? -multiple choices reply-(optional)	Member States need to open their support schemes to renewable generation from other Member States
Please explain how this could be achieved for other Member States (e.g. through convergence of national schemes, compensation mechanisms or other) -open reply-(optional)	
B.7. Do national support schemes and differences between such schemes distort competition? -single choice reply-(optional)	Yes, some support schemes are more distorting than others (please specify which you consider most distorting)
Please specify which support schemes you consider most distorting -open reply-(optional)	
Premium feed-in tariffs in certain countries give industry a cost advantage; this distorts competition	
C. ADMINISTRATIVE PROCEDURES	
C.1. Which of the following issues relating to administrative procedures, information and training do you consider acting as a serious impediment to further growth of renewables following Member States' implementation of the provisions of the Directive? -multiple choices reply-(optional)	
C.1.1. Please provide explanations and specific examples where available -open reply-(optional)	
C.2. Which policy response to the problems identified above do you consider appropriate? -single choice reply-(optional)	
D. GRID INTEGRATION OF ELECTRICITY FROM RENEWABLE ENERGY SOURCES	
D.1. Do you consider that any of the following national rules and framework conditions will still create obstacles to renewable energy production after 2020? -multiple choices reply-(optional)	
D.1.1. Please specify which obstacles and the nature and degree of them for each -open reply-(optional)	

D.2. Which renewables-specific grid related rules do you consider necessary and proportionate in a post-2020 perspective? -multiple choices reply-(optional)	Obligation for network operator to develop network - Priority or guaranteed access
D.2.1. Please explain why -open reply-(optional)	
D.3. With regard to system integration of wind and solar power, what measures do you consider most important to increase the flexibility reserve of the system: -multiple choices reply-(optional)	
E. MARKET INTEGRATION	
E.1. In which of the following ways could renewable energy be made responsive to market signals? -multiple choices reply-(optional)	Producers of renewable energy should bear greater responsibility for system costs
E.2. How can it be ensured that market arrangements reward flexibility? -multiple choices reply-(optional)	
E.3. In how far do you think today's market design needs to be adapted to provide an appropriate framework for renewables -single choice reply-(optional)	
F. RENEWABLES IN HEATING AND COOLING	
F.1. What do you consider to be the main barriers against a stronger uptake of renewable energy in the heating and cooling market beyond 2020? -multiple choices reply-(optional)	
F.2. What pathways do you consider to be the most promising for further increasing the share of renewable energy in heating and cooling beyond 2020? -multiple choices reply-(optional)	
F.3. How do you see the interaction of promoting further use of renewable energy in heating and cooling and enhancing energy efficiency in this sector? -open reply-(optional)	
G. RENEWABLES IN TRANSPORT	
G.1. What do you consider to be the main barriers against a stronger uptake of renewable energy in transport? -multiple choices reply-(optional)	Costs - Pace of technology development
G.2. What sectors of transport do you consider to be the most promising for further increasing the share of renewable energy? -multiple choices	Road for passengers - Road for goods

reply-(optional)

G.2.1. Please explain your answer -open reply-(optional)

H. SUSTAINABILITY

H.1. Do you think that additional sustainability criteria are necessary in the post 2020 period?

-multiple choices reply-(optional)

Yes, sustainability criteria should apply to both all biomass and fossil fuels

H.1.1. Please explain -open reply-(optional)

Efficiency measures have to be introduced in all fuel sectors.

I. REGIONAL AND INTERNATIONAL DIMENSIONS

I.1. Do you consider current rules for cooperation between Member States sufficient to fulfil their purpose, i.e. realisation of cost-efficient renewable potential in the EU?

-single choice reply-(optional)

N/A

I.2. Do you think the EU should further facilitate cooperation with third countries when it comes to the development of the potential for renewable energy? -single choice reply-(optional)

Yes, cooperation with third countries should be further promoted (please specify how and with whom, i.e. only neighbouring countries or more widely)

Please specify how and with whom, i.e. only neighbouring countries or more widely -open reply-(optional)

I.3. Should investments in electricity networks in some Member States (i.e. Spain, Greece, Italy) be prioritized for this purpose? -single choice reply-(optional)

N/A

I.4. Which measures do you consider appropriate and necessary in order to foster cooperation with third countries in this area?

-single choice reply-(optional)

Agreements between the EU and third countries

I.5. In its Communication on security of supply and energy cooperation – "The EU Energy Policy: Engaging with Partners beyond our Borders", the European Commission proposes to promote cooperation on renewable energy projects with the Southern Mediterranean countries and to gradually build a renewed EU-Mediterranean energy partnership focus on electricity and renewable energy. How do you consider this should relate with the EU internal renewables policy? What should be the priorities? -open reply-(optional)

I.6. The possibility to explore regional cooperation and a coordinated, more strategic approach to grid connection for the rapidly growing volume of offshore wind generation in the North Sea is currently being explored in the framework of the North Sea Countries Offshore Grid Initiative (NSCOGI). Do you think such cooperation should be further fostered? What benefits do you think could arise from it? Do you consider that this experience could be generalised and applied elsewhere? -open reply-(optional)

J. TECHNOLOGY DEVELOPMENT

<p>J.1. For a first set of renewable technologies, namely wind, solar, bio-energy, the SET Plan aims at a cost-competitive market roll out of renewable energy by 2020. It also aims at enabling integration of renewable energy into the electricity grid and smart cities and communities. In your view, what would be the remaining key challenges of these technologies to be addressed by research and innovation in view of the 2050 objectives?</p> <p>-multiple choices reply-(optional)</p>	Technology performance and cost-competitiveness
<p>J.2. Which additional measures and/or instruments should be developed to address these technologies and their remaining challenges and to ensure that the EU innovation fabric is geared to supporting the significant deployment up to 2050? -open reply-(optional)</p>	
<p>J.3. In your point of view, which technologies other than those covered by the current industrial initiatives should be given priority in the post-2020 perspective? Please justify with reference to the criteria mentioned above, i.e. large-scale availability and willingness of industry to engage in public private partnerships?</p> <p>-open reply-(optional)</p>	
<p>J.4. How successful do you consider the existing measures have been and which have been the main drawbacks? -single choice reply-(optional)</p>	Successful but some drawbacks (please specify which)
<p>Please specify which drawbacks -open reply-(optional)</p> <p>Subsidies drove investments</p>	
<p>J.5. Do you consider that assistance in technology development should be linked to a certain result to be achieved by a certain deadline?</p> <p>-open reply-(optional)</p>	

IDENTIFICATION	
<p>2. Are you responding to this questionnaire on behalf of /as:</p> <p>-single choice reply-(optional)</p>	Industry
<p>3. Please indicate your country -single choice reply-(optional)</p>	United Kingdom
<p>4. How would you prefer your contribution to be published on the Commission website, if at all?</p> <p>-single choice reply-(optional)</p>	Anonymously (I consent to publication of all information in my contribution and I declare that none of it is under copyright restrictions that prevent publication)
A. GENERAL POLICY APPROACH	
<p>A.1. Is there a role for new targets for renewable energy sources post-2020 assuming that any targets must be consistent with climate mitigation and energy efficiency policies and targets as is currently the case</p>	Yes, a mandatory target at EU level is appropriate

with the 20/20/20 targets in the Europe 2020 strategy? -multiple choices reply-(optional)	
A.1.1. Please explain the reasons for your answer (such as the scope and contribution from GHG targets/ETS, the need to address other environmental, security of supply or technological development benefits) -open reply-(optional)	
The Oil & Gas and the Nuclear lobbies and the interests they represent are so large and powerful only the strongest legislation will offset their power.	
A.2. Are other policy elements necessary to promote renewable energy post-2020, such as: -multiple choices reply-(optional)	Enhanced focus on R&D to bring down the costs of renewables technologies
B. FINANCIAL SUPPORT	
B.1. Do you consider that financial support will continue to be necessary to support renewables post 2020 given their expected greater penetration? -single choice reply-(optional)	For selected technologies/circumstances/markets (please specify)
Please specify which technologies/circumstances/markets -open reply-(optional)	
Financial support will be required in the absence of a carbon tax or equivalent	
B.2. If renewable energy sources require support post-2020, how do you think this can best be achieved with a view to achieving a cost-effective deployment? -multiple choices reply-(optional)	Accelerate convergence of national support schemes - Phase out support schemes over time (please specify for which technologies if applicable)
Please specify for which technologies (if applicable) to phase out support schemes over time -open reply-(optional)	
All technologies need a phase out of support but diferent technologies will regure different dates. This also applies to fossil fuel and nuclear support mechanisms.	
B.3. Do you think it would be useful to develop common approaches as regards Member States' financial support for renewables? -single choice reply-(optional)	Yes, with EU-wide benchmark values for support level per technology
B.4. Should the structure of financial support be gradually aligned EU-wide? -single choice reply-(optional)	N/A
B.5. With regard to questions B.3. and B.4. please specify if you see a difference between the different sectors (electricity, heating and cooling, transport). -open reply-(optional)	
B.6. How do you see the relation between support schemes for renewable energy and the requirements of the internal electricity market for the period after 2020 against the background of a rising share of renewables? -multiple choices reply-(optional)	
B.7. Do national support schemes and	

differences between such schemes distort competition? -single choice reply-(optional)

C. ADMINISTRATIVE PROCEDURES

C.1. Which of the following issues relating to administrative procedures, information and training do you consider acting as a serious impediment to further growth of renewables following Member States' implementation of the provisions of the Directive? -multiple choices reply-(optional)

Length and complexity of administrative procedures relating to authorisation/certification/licensing

C.1.1. Please provide explanations and specific examples where available
-open reply-(optional)

C.2. Which policy response to the problems identified above do you consider appropriate?
-single choice reply-(optional)

D. GRID INTEGRATION OF ELECTRICITY FROM RENEWABLE ENERGY SOURCES

D.1. Do you consider that any of the following national rules and framework conditions will still create obstacles to renewable energy production after 2020? -multiple choices reply-(optional)

D.1.1. Please specify which obstacles and the nature and degree of them for each -open reply-(optional)

D.2. Which renewables-specific grid related rules do you consider necessary and proportionate in a post-2020 perspective?
-multiple choices reply-(optional)

D.2.1. Please explain why -open reply-(optional)

D.3. With regard to system integration of wind and solar power, what measures do you consider most important to increase the flexibility reserve of the system: -multiple choices reply-(optional)

E. MARKET INTEGRATION

E.1. In which of the following ways could renewable energy be made responsive to market signals? -multiple choices reply-(optional)

E.2. How can it be ensured that market arrangements reward flexibility?

-multiple choices reply-(optional)	
E.3. In how far do you think today's market design needs to be adapted to provide an appropriate framework for renewables -single choice reply-(optional)	
F. RENEWABLES IN HEATING AND COOLING	
F.1. What do you consider to be the main barriers against a stronger uptake of renewable energy in the heating and cooling market beyond 2020? -multiple choices reply-(optional)	Building regulations etc. - Lack of public support
F.2. What pathways do you consider to be the most promising for further increasing the share of renewable energy in heating and cooling beyond 2020? -multiple choices reply-(optional)	Electrification together with higher share of renewables in electricity production
F.3. How do you see the interaction of promoting further use of renewable energy in heating and cooling and enhancing energy efficiency in this sector? -open reply-(optional)	
G. RENEWABLES IN TRANSPORT	
G.1. What do you consider to be the main barriers against a stronger uptake of renewable energy in transport? -multiple choices reply-(optional)	Other (please specify)
Please specify which other barriers -open reply-(optional)	
Lack of viable vehicles	
G.2. What sectors of transport do you consider to be the most promising for further increasing the share of renewable energy? -multiple choices reply-(optional)	Road for passengers
G.2.1. Please explain your answer -open reply-(optional)	
I think that a hybrid car that can run on grid charged batteries for circa 50km and the excess on petrol/diesel helped solve a number of issues in addition to reducing reliance on fossil fuels. Notably pollution in cities and noise for people living next to roads	
H. SUSTAINABILITY	
H.1. Do you think that additional sustainability criteria are necessary in the post 2020 period? -multiple choices reply-(optional)	Yes, sustainability criteria should apply to both all biomass and fossil fuels
H.1.1. Please explain -open reply-(optional)	
I. REGIONAL AND INTERNATIONAL DIMENSIONS	
I.1. Do you consider current rules for cooperation between Member States sufficient	

to fulfil their purpose, i.e. realisation of cost-efficient renewable potential in the EU? -single choice reply-(optional)	
I.2. Do you think the EU should further facilitate cooperation with third countries when it comes to the development of the potential for renewable energy? -single choice reply-(optional)	
I.3. Should investments in electricity networks in some Member States (i.e. Spain, Greece, Italy) be prioritized for this purpose? -single choice reply-(optional)	
I.4. Which measures do you consider appropriate and necessary in order to foster cooperation with third countries in this area? -single choice reply-(optional)	
I.5. In its Communication on security of supply and energy cooperation – "The EU Energy Policy: Engaging with Partners beyond our Borders", the European Commission proposes to promote cooperation on renewable energy projects with the Southern Mediterranean countries and to gradually build a renewed EU-Mediterranean energy partnership focus on electricity and renewable energy. How do you consider this should relate with the EU internal renewables policy? What should be the priorities? -open reply-(optional)	
I.6. The possibility to explore regional cooperation and a coordinated, more strategic approach to grid connection for the rapidly growing volume of offshore wind generation in the North Sea is currently being explored in the framework of the North Sea Countries Offshore Grid Initiative (NSCOGI). Do you think such cooperation should be further fostered? What benefits do you think could arise from it? Do you consider that this experience could be generalised and applied elsewhere? -open reply-(optional)	
J. TECHNOLOGY DEVELOPMENT	
J.1. For a first set of renewable technologies, namely wind, solar, bio-energy, the SET Plan aims at a cost-competitive market roll out of renewable energy by 2020. It also aims at enabling integration of renewable energy into the electricity grid and smart cities and communities. In your view, what would be the remaining key challenges of these technologies to be addressed by research and innovation in view of the 2050 objectives? -multiple choices reply-(optional)	Industrial manufacturing and supply chain
J.2. Which additional measures and/or instruments should be developed to address these technologies and their remaining challenges and to ensure that the EU innovation fabric is geared to supporting the significant deployment up to 2050? -open reply-(optional)	
J.3. In your point of view, which technologies other than those covered by the current industrial initiatives should be given priority in the post-2020 perspective? Please justify with reference to the criteria mentioned above, i.e. large-scale availability and willingness of industry to engage in public private partnerships? -open reply-(optional)	

J.4. How successful do you consider the existing measures have been and which have been the main drawbacks? -single choice reply-
(optional)

Successful but some drawbacks (please specify which)

Please specify which drawbacks -open reply-(optional)

I fear that they may be inflationary and the prime driver should be to reduce the cost of renewable energy. Once it is cost competitive then virtually all other issues are solved

J.5. Do you consider that assistance in technology development should be linked to a certain result to be achieved by a certain deadline?

-open reply-(optional)