

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)

United Kingdom

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)

The current system of EU and sectoral level targets (particularly in transport) appears to be providing a frame work that will deliver results. Mandatory targets are essential to ensure Member States' continue to support renewables. Sectoral targets should be reviewed in time once there has been more deployment of renewables, to see whether implementation is matching expectation. Targets need to be legally binding in order to provide a strong signal to investors. Renewables also contribute towards GHG reduction targets, ensuring security of supply, and have other environmental benefits. Sectoral target ensure all sectors should play their part.

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 - Better financing possibilities - Continue to ensure sustainability and scalability - Other (please specify)

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

Clear hierarchical prioritisation of policy interests; for example is meeting the national interest in increased renewables more important than local issues over plant location or renewable energy more important than habitat conservation?

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)

The market should decide the best responses to meeting policy aims but new technologies will often require initial support to enter the market

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)

Benchmarking is key to avoid financial distortions between markets especially in more international sectors such as transport. The market and deployment of renewables in each Member State is very different. It is likely how support schemes can become more market oriented will vary and this analysis will need to be undertaken once the deployment of renewables has increased. Where appropriate policy support could be connected to carbon saved, particularly for biofuel/ biomass technologies.

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)

Different circumstances exist at the regional level within member states and between different member states and there should be flexibility to take this into account.

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)

For example the UK tax credit for the use of Used Cooking Oil as a biofuel feedstock in addition to allowing of "double counting" of waste feedstocks.

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)

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)

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)

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

The current wholesale market model based on short-run marginal cost pricing would have to be supplemented by instruments

choice reply-(optional)	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 suitable information - 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)	Biomass - Geothermal - Solar thermal - 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)	Pace of technology development - Lack of standards - Lack of infrastructure - Lack of suitable information
--	--

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 - Rail - Water - Air
--	---

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

There is and urgent need to develop the required fuel standards to enable pan European vehicle specifications and thus increase renewable uptake. The development of an agree standard for electric vehicle recharging plug was a significant step for the electric vehicle market.

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
--	-----

<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>No, the EU should first focus on developing its own renewable potential</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>N/A</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>Bilateral agreements between Member States 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>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>	
<h2>J. TECHNOLOGY DEVELOPMENT</h2>	
<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? -multiple choices reply-(optional)</p>	<p>Technology performance and cost-competitiveness - System integration</p>
<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? -open reply-(optional)</p>	
<p>J.4. How successful do you consider the</p>	<p>Successful but some drawbacks (please specify which)</p>

existing measures have been and which have been the main drawbacks? -single choice reply- (optional)	
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)	
Yes with realistic progress reviews, if there is a near miss on a target or progress slightly slower than anticipated support should not necessarily be withdrawn, there needs to be progressive approach.	

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)	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, an indicative and non-legally binding 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)	
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) - Other (please specify)
Please specify which other policy elements? -open reply-(optional)	
It would be a step in the right direction to overcome restraints regarding grid access, e.g. in the field of biogas providers.	
B. FINANCIAL SUPPORT	
B.1. Do you consider that financial support will	N/A

continue to be necessary to support renewables post 2020 given their expected greater penetration? -single choice reply-(optional)	
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) - Open up national support schemes to cross-border projects
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)	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 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, 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)	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? -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)	
---	--

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 - Lack of standards - Lack of infrastructure - 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)

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)

From ADACs perspective the most important point is, that sustainability criteria should not only apply to the production of biofuel but to all consumers of biomass, e.g. industry branches for feeding stuff, food products or cosmetics.

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)

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)

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-

Czech Republic

(optional)	
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, an indicative and non-legally binding 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)	
<p>The EU Climate policy costs have become the cardinal part of the total electricity price and they represent more than 1/3 now. In addition there is a huge risk that this part of the price will arise rapidly in the future. And this is exactly the part which our worldwide competitors do not have to pay in their bills. If we want to preserve some remains of competitiveness, European industry needs the same conditions as its world competitors do have. This can be achieved in two ways: The European Union must quickly convince other countries about the correctness of the path and the cost of climate change policy will apply to industries in all countries of the world. Till this time this effort has completely failed and has resulted in a sharp harm of the interests of European industry and citizens. Until this succeeds, it is necessary to reassess EU climate change policy and to suspend any action that has brought a disadvantage for European industry against its global competitors. It is necessary to keep in mind that the EU's share is only less than 15% of global emissions. Even if all of Europe has disappeared from the map of the world view it does not solve anything.</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 - Other (please specify)
Please specify which other policy elements? -open reply-(optional)	
<p>R&D is the most effective way because it may decrease costs. The influence of RES support on the electricity price: The price has risen by 22% till 2012 and the share of RES support is 18% from the total price. This situation very negatively affects the European industry competitiveness.</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)	For selected technologies/circumstances/markets (please specify)
Please specify which technologies/circumstances/markets -open reply-(optional)	
<p>The operation of RES with non-competitive prices should be supported very carefully. The money should be given to R&D. Only when the costs for certain kind of RES are competitive this RES should be installed and operated.</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)	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)

Financial support should address the aim to bring new technologies to the market and therefore be phased out over time. Therefore, support required beyond 2020 for existing installations is questionable since this would constitute long-term public funding dependence outside the market. Mature renewable energy technologies need to be integrated into the regular energy market. The support scheme should be a transparent (so without indirect subsidies) EU-wide approach in order to urge optimisation in terms of geographical development of the different technologies. Nevertheless, this doesn't address the global competitiveness issue. Therefore, well balanced cost allocation should be applied within Europe with equally high exemptions for energy intensive industries in order to preserve a level-playing field in Europe and to maintain the international competitiveness of the European industry.

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)

There is no doubt the EU climate change policy very negatively affects the European industry competitiveness as a whole. In addition, non-harmonisation of support schemes significantly affects the competitiveness of industry in particular countries within EU. There are various models for surcharge paid by industrial consumers. Czech industry is in the worst situation: The consumer's surcharge is at least twice higher than in other countries (except Germany) and there is no protection for industrial consumers in Czech Republic (Germany has its own system of protection for energy intensive industry). For the reason of fair competition we suggest: - The costs of climate change policy (EU ETS, RES surcharge, ecological taxes, investments to the transmission and distribution grids, biofuels, etc.) should be clearly quantified in each country. The reasonable amount of this costs should be recommend, or as a percentage of national GDP or better as percentage of national GDP per inhabitant. - The harmonisation of RES support schemes, their total costs in each country, and the surcharge paid by industrial consumers should be the first step. Potential harmonization could be as follows: 1. Total costs of RES support as percentage of national GDP per inhabitant 2. The surcharge paid by industrial consumers 3. Level of support (reasonable amount of support provided)

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)

Till this time, the most of measures are oriented to electricity. Industry sector have to pay the most costs and this situation has strongly undermined its competitiveness. This is the worst way we could chose: it have negative influence to the EU economy competitiveness and living standard. This approach is one of the reasons of today economical crisis. Transport sector has approximately the same share (40%) of emissions, and there are almost no measures in it. And air transport can be taken more as a luxury then economical necessity.

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)

Massive support of RES with non-competitive high prices to unreasonable costs: The boom of photovoltaic plants in cloudy Czech Republic in 2010 is the sad example. We can mention the case of large international company. The announced they have to dismiss 600

employees because they are not competitive. They would be able to decrease their costs by 640 million CZK/year. But in the same time they have to pay 629 million CZK/year for RES support. Both amounts are approximately the same. That means if there is no RES support the company would have not to dismiss people.

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)

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)

The RES brings the additional costs beside the RES support: Balancing, necessary investments to the grids, backup, ... These costs should be transparently assigned to the total RES costs. RES effectiveness should be evaluated from the point of view of their total costs.

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

Other (please specify)

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

Economical effectiveness should be a basic approach.

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)

Market-based measures: better use of interconnectors (implicit auctions), trading closer to real time - Enable renewable generators to offer balancing services to TSOs

E. MARKET INTEGRATION

<p>E.1. In which of the following ways could renewable energy be made responsive to market signals? -multiple choices reply-(optional)</p>	<p>Price risk – producers of renewable energy should operate without any aid - Producers of renewable energy should bear greater responsibility for system costs - Balancing risk – producers of renewable energy should bear balancing responsibility towards TSOs (if so, please specify how: responsibility on individual operator or centrally organised, same balancing rules for all operators or specific rules for variable generation?)</p>
--	--

Balancing risk, please specify how: responsibility on individual operator or centrally organised, same balancing rules for all operators or specific rules for variable generation?
 -open reply-(optional)

The same rules for all kind of generation would be most effective.

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

<p>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)</p>	<p>Wholesale markets would have to move to reflecting full costs</p>
--	--

F. RENEWABLES IN HEATING AND COOLING

<p>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)</p>	<p>Lack of suitable information</p>
--	-------------------------------------

<p>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)</p>	<p>Biomass - Solar thermal - Other (please specify)</p>
--	---

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

Everything what is economically effective.

<p>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)</p>

G. RENEWABLES IN TRANSPORT

<p>G.1. What do you consider to be the main barriers against a stronger uptake of renewable energy in transport? -multiple choices reply-(optional)</p>	<p>Costs - Lack of infrastructure - Limits of availability of sustainably produced biofuels</p>
---	---

<p>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)</p>	<p>Road for passengers - Road for goods - Rail</p>
---	--

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

Energy efficiency of transport should be preferred to RES. For example, the railway transport is 10 time energy effective then road transport, but there are no incentives to prefer it.

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)

The land should be preferably used for growing food and only the rests for RES production. If the potential of biomass is not realistic it could be dangerous.

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)	N/A
---	-----

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)	Other measures (please specify)
--	---------------------------------

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

Economical effectiveness should be a basic approach.

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)

Economical effectiveness should be a basic approach.

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)

Germany should quickly invest to its transmission grid from north to south. The great amount of wind generation have brought troubles to the other national TSOs. This situation does not bring benefit but the real risk of black out.

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>	<p>Technology performance and cost-competitiveness</p>
<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>Nuclear. If we like it or not, this is only reliable and cost effective source for at least next 100 years.</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>	<p>Successful but some drawbacks (please specify which)</p>
<p>Please specify which drawbacks -open reply-(optional)</p>	
<p>The answer depends on point of view: If we evaluate the situation from the aims and targets, there is a great success. But if we do the same from economical point of view, we must see that the competitiveness of industry rapidly decreases.</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>	

<h2>IDENTIFICATION</h2>	
<p>2. Are you responding to this questionnaire on behalf of /as:</p> <p>-single choice reply-(optional)</p>	<p>Industry</p>
<p>3. Please indicate your country -single choice reply-(optional)</p>	<p>Italy</p>
<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>	<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)</p>
<h2>A. GENERAL POLICY APPROACH</h2>	
<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</p>	<p>Yes, an indicative and non-legally binding target at EU level is appropriate</p>

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)

In our opinion, a mandatory target is excessive and potentially detrimental for the competitiveness of the system. Further, sectoral targets are useless giving the fact that 1 ton of CO2 is the same regardless of the sector which produce them. It would be preferable a cost effective allocation of CO2 reductions according to market mechanisms.

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)

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)

We consider that financial support will continue to be necessary for selected technologies/circumstances/markets and SECTORS. Specific attention to efficiency should be applied, besides the learning curve of each technology should be taken in consideration as well as the distance from the "grid parity".

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)

Renewables' support schemes should be flexible to be in line with the market situation. In particular it should react to the fluctuation of the electricity price and to the prices of energy commodities, as well as to the stage of the learning curve.

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)

We deem necessary to harmonize financial support throughout EU applying a cost/efficiency criteria.

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, each sector has its own peculiarities in terms of demand, technologies and fuel mix, therefore each sector require a specific.

B.6. How do you see the relation between

Member States need to open their support schemes to renewable

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)

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)

The most distorting support schemes are fixed feed-in premium and in general those that are integrally paid by the final customers. It also affects the competitiveness of energy intensive industries.

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)

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)

About the development of the RES after 2020, we think that it would be developed in a clear regulatory framework and taking in to account the differences related to the technology and the background. The different generating sources should be evaluated in a non discriminatory way and considering the participation at the global costs of the system.

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

None of the above

-multiple choices reply-(optional)	
D.2.1. Please explain why -open reply-(optional)	
In our opinion after 2020 shouldn't be specific rules for renewables. In relation to this please see previous answers.	
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 ...)
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 - Balancing risk – producers of renewable energy should bear balancing responsibility towards TSOs (if so, please specify how: responsibility on individual operator or centrally organised, same balancing rules for all operators or specific rules for variable generation?)
Balancing risk, please specify how: responsibility on individual operator or centrally organised, same balancing rules for all operators or specific rules for variable generation? -open 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)	The current wholesale market model based on short-run marginal cost pricing is appropriate
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)	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)	
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)	
Residential sector is crucial for the stability of the whole energy system; for this reason the introduction of measures in this sector should be carefully evaluated. The payback period for investments in residential sector is longer than in other sectors. Further, a fuel switch in disadvantage of natural gas could determine stranded costs in the system that could be encumber on the gas fired power plants that grant the backup for the renewables.	
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)	Pace of technology development - Limits of availability of sustainably produced biofuels - Other (please specify)
--	---

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

The main hindrance to a stronger uptake of biofuels is their dismal price competitiveness in respect to fossil fuels. High commodity prices, production and distribution costs affect negatively the market price of ethanol and biodiesel. Biofuels further lose out to carbon fuels if the price comparison is made in terms of energy units. Additionally, second-generation biofuels are environmentally sustainable products but their high production costs still prevent them from going beyond the demo stage so as to reach the commercial phase. Furthermore, blending limits (and negligible market shares of flexifuel vehicles) are another obstacle to the achievement of economies of scale in the biofuels industry.

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)	Rail - Air
--	------------

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

Rail sector is the easiest way to introduce renewable electricity in the grid. Further we believe that the air transport sector has the highest potential in terms of commercial penetration of alternative fuels. Biojet production has entered the commercial stage and it is in line with the European provisions that will be legally enforced for the air industry. Biojet is commonly blended at 50% with traditional kerosene and could ensure CO2 savings up to 85% according to current UE criteria.

H. SUSTAINABILITY

H.1. Do you think that additional sustainability criteria are necessary in the post 2020 period? -multiple choices reply-(optional)	Yes, additional criteria should be introduced to promote only the best performing biomass (please specify which)
---	--

Please specify which criteria
-open reply-(optional)

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

Yes. We believe that EU sustainability criteria should promote only the best performing biomass in terms of CO2-capture. It's necessary to strictly verify the effectiveness of the current sustainability criteria and improve them if needed and check against the availability of such products. The criteria should take into account the impact of indirect land-use change on the emission balance. In this regard we reckon that the most promising feedstocks, that should be favoured by the EU authorities, are urban-agricultural wastes, microalgae and plants that are able to grow on marginal lands.

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)	
---	--

<p>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>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>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>	
<h2>J. TECHNOLOGY DEVELOPMENT</h2>	
<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? -multiple choices reply-(optional)</p>	<p>Technology performance and cost-competitiveness - Industrial manufacturing and supply chain - Other (please specify)</p>
<p>Please specify which other key challenges -open reply-(optional)</p>	
<p>The support to R&D is essential to fulfill cost reduction and improve renewable lifecycle sustainability. As for biomass, it is important to select appropriate areas.</p>	
<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>We agree with the lines for the European R&D presented in the SET Plan e in Horizon 2020 and we hope that these lines will be confirmed after their deadline. Further, in these particular moment for the economy, we think that is mandatory to minimize the investment risks for emerging technologies by public financing and financial instruments to promote joint ventures.</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? -open reply-(optional)</p>	
<p>J.4. How successful do you consider the</p>	<p>Successful but some drawbacks (please specify which)</p>

existing measures have been and which have been the main drawbacks? -single choice reply- (optional)

Please specify which drawbacks -open reply-(optional)

Some sectors/technologies are currently oversupported while others receive marginal supports.

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)

Yes, as for industrial support.

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)

Denmark

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)

The Carbon price is so low that it does not function as a driver for low carbon investment in the ETS sector, and the oversupply of allowances in ETS phase III does not bring about confidence that this will occur. Also beyond 2020, there is little evidence that the CO2 price can alone drive investment even though suppliers and utilities are projecting to reduce costs significantly for renewable technologies such as offshore wind. Future RES policy should interact with CO2 emissions reduction targets and energy efficiency policies in a mutually reinforcing manner and not undermine other policies such as the ETS, which is today unintentionally weakened by renewable energy and energy efficiency policies. We agree that the EU should preferably not set standalone 2030 targets for RES, but also CO2 targets for 2030 including a recalibration of the ETS by reducing significantly the annual linear reduction factor of 1.74%. The requirement laid down in the RES Directive of presenting, in 2018, a post 2020 roadmap does not mirror the need within the energy sector for certainty for the medium term renewable energy policy framework, and should be replaced by more anticipatory policies that provide immediate investor confidence and seek to minimize the current policy gap in EU renewable energy policy arising after 2020. The sector specific binding target for the transportation sector for 2020 should be extended - in particular improved incentives or targets for 2G biofuels are needed.

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 - Continue to ensure sustainability and scalability - Other (please specify)

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

The failure of the CO2 price to drive investment in the ETS sector underscores the urgent need for more ambitious and binding reduction targets. In the absence of such targets it should be considered to introduce a carbon floor price similar to the one introduced in the UK, securing that the incentives foreseen in the 2008 energy and climate package are properly restored. For the system to encompass vast amounts of variable RES, the EU must be much better interconnected than today. This requires a consistent European policy regime for planning, permitting, and building of new transmission lines.

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)

The RES-E sector comprises a large range of technologies with different cost and maturity levels. There has also been a wide-ranging approach to support for and development of renewables in different member states, which has had implications for supply chain location and cost. To achieve national RES targets, it is important that investment incentives are protected from regulatory risk and unnecessary delays from changes in the financial support mechanisms. To industrialize maturing RES technologies, financial support framework needs to provide cost reduction incentives to the developers and a transitional process for gradually increasing exposure to market risks. Eventually, matured technologies will compete in the market alongside conventional technologies. Timing and extent will differ among technologies and Member States. E.g. onshore wind is a matured industry; both onshore and offshore wind are expecting reductions in support levels in under the UK Renewables Obligation as they are expected to compete with conventional generation technologies. However, until the closure of the RO in 2037, those projects accredited under the scheme will continue to receive ROCs for the remainder of the 20 year tenure, or 2037 (whichever is earlier). The UK Government is proposing to replace the RO with a CFD FIT, in recognition that support is still required for all RES projects. With this in mind focus is on technology improvement and cost of energy reduction to reduce support need.

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)

Subject to the constraint of meeting any EU target, we believe that individual Member States should be allowed to design their own national policies for renewables deployment and emissions reduction. We believe that making support schemes more market oriented, given the target to move to a single European electricity market by 2014, will help to increase cost-effective deployment. Requiring renewable generators to interact more with the market would ease the process of preparation for a world in which renewables are cost competitive with other forms of generation. This could for example be achieved through a premium where the support level is more explicitly linked to the market price and by placing more of the balancing risk on renewable generators. Designing and implementing market-oriented support schemes should be however balanced with the simplicity of the individual mechanisms, clarity on their timelines and high degrees of regulatory trustworthiness in order to attract and retain sufficient capital from the institutional investors.

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

-open reply-(optional)

Eventually, financial support schemes for industrialised mature technologies that are able to compete with conventional generation should be phased out over time.

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)	
<p>B3) We believe that Member States should be free to decide on the design and level of support offered to renewable technologies. Individual Member States should also be allowed to set financial support at levels deemed appropriate to meet any additional targets, such as more ambitious targets for renewables deployment. Developing and implementing support level benchmarks or other common approaches has a risk of increasing administrative weight on the renewable energy projects and consequently adding otherwise avoided time delays and uncertainties on the investment decisions. Developing benchmarks and converging support measures is also likely to take time, and thereby create an extended period of greater uncertainty for investors. We are too far into the transformation process to risk stop-go policies resulting from advanced EU wide policy making. B4) Electricity markets in Member States would require extensive harmonisation in many areas before harmonisation of financial support would bring any benefits. However, we believe that Member States should be allowed to cooperate across borders and align support schemes voluntarily (as planned by Sweden and (although not a Member State) Norway). Enforced alignment could cause significant uncertainty and detriment to the appetite for investment in certain Member States, and would also reduce individual Member State's ability to meet its own policy objectives such as higher renewables deployment or job creation.</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)	
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)	
<p>All support schemes by their nature are distorting market competition, however those that are designed to expose renewable technologies to the price risk (e.g. premium on the market price, green certificates and the like) have significantly less detrimental effect on market competitiveness and allow for a higher levels of market integration for mature (and maturing) renewable technologies in well-functioning and liquid markets. Fixed support levels on the contrary are lessening the extent to which a well-functioning and liquid marketplace is able to develop. As an energy company, we believe in market-based principles for allocation of financial support also to immature technologies, however with a large investment pipeline in offshore wind in front of us, in the short to medium term, existing forms of support schemes are a preferred option as they currently allow for greater confidence in the financial investor community. In the long-run, when the offshore wind technology is maturing, it will be reasonable to provide for a transitional support arrangement where respective support schemes are more exposed to market price risk. Finally – with maturation of the technology, it will be natural to phase out support schemes and fully expose it to the market risks.</p>	
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	Length and complexity of administrative procedures relating to authorisation/certification/licensing - Lack of commonly agreed technical specifications

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)

The consent process has been shortened in the UK. However, with more information required in the earlier phases of the process which possibly limits flexibility of decision-making in individual projects under development. Excessively complex and lengthy procedures for developing interconnectors in Germany vs. more effective rules in the UK. Different standards for wind turbines in different countries, e.g. Germany has very detailed requirements to technical specifications and very early in the process; while the framework for technical specifications approval allows for much more flexibility in the UK, which helps to mitigate technology and market risks associated with projects.

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)

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)

While some Member States are more advanced in their respective rules and framework conditions for grid connection and cost sharing, most countries still need to develop rules for ownership, and harmonize principles for grid use e.g. availability and timeliness and cost allocation in a way that helps accelerate industrialisation of maturing renewable technologies, e.g. offshore wind. Some European transmission grid interconnections are still part of the legacy contracts and are unavailable for cross border flow balancing and this may impose extra pressure on the entire electricity system in the future European electricity system with large portions of intermittent renewable generation. Insufficiency in the grid capacity therefore might in the future result not only from physical but be constrained by the contractual unavailability. Finally, in the future market for electricity it will be important to share common principles for curtailment and congestion management across all Member States. As an example, it will be crucial that all interconnector capacity is made available for the market, and is not reduced by pushing internal bottlenecks to the borders. As far as maturing renewable technologies are concerned, we recommend that they are treated in the same way as other types of mature generation technologies, e.g. that the curtailment is compensated on the fair and case by case basis, signaling most severe and recurring problems as related to grid capacity being insufficient.

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)

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

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 - Price risk – producers of renewable energy should operate without any aid - Balancing risk – producers of renewable energy should bear balancing responsibility towards TSOs (if so, please specify how: responsibility on individual operator or centrally organised, same balancing rules for all operators or specific rules for variable generation?)

Balancing risk, please specify how: responsibility on individual operator or centrally organised, same balancing rules for all operators or specific rules for variable generation?

-open reply-(optional)

Responsibility for managing balancing risk should be placed on the individual renewable asset operators who are in the best position to manage forecasting and submitting nominations for their generation and have an interest in minimizing their balancing costs, thereby incentivizing them to improve on their balancing abilities. This has to be done however only in a fully functional and liquid long-term forward and short-term (e.g. intraday) marketplaces in order to allow renewable operators to transact on timescales relevant to their operational activities.

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)

Market design should put a real price on all services that are needed to operate the system, including energy, flexibility, reserves, ancillary services and other necessary capabilities. Price caps, fragmented and crude markets for reserves and ancillary services, grid codes that makes capabilities a requirement (stick) rather than a market based need (carrot) all undermine the incentives to supply flexibility. Eliminating such barriers should be the first target. That said, there may be further needs to incentivize flexible capacity, as the demand increases with inflow of large volumes of variable RES.

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)

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 - 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)

By using biomass in high efficient CHP plants (with the requirements for CHP as described in the draft energy efficiency directive).

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 standards - Lack of infrastructure - Other (please specify)

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

As for advanced biofuels, the barrier has moved from being of technical nature to policy and financing. New innovative technologies like advanced biofuels are not yet competitive with conventional biofuels and fossil fuels. Hence commercialization depends on political leadership and adequate and long-term stable policies. The present incentives specifically targeting advanced biofuels, i.e. double-counting, has not delivered significant results. Therefore there is a need for more concrete incentives, that could go into the investment calculation for actual plants. The FQD (Fuel Quality Directive) and the proposed amendments to the ETD (Energy Taxation Directive) are both moving in the right direction, but a continuation and further strengthening of their demands in terms of CO2 reduction and taxation of fossil fuels should be implemented post-2020. Specifically the FQD should allow for higher blends than 10% ethanol and 7% biodiesel to increase the biofuel component. The proposed ETD should be adopted, as it would end the perverse situation that biofuels are taxed at higher rates than fossil fuels, when volume is the basis for taxation, as is still the case in many Member States.

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 - Air

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 has the capability to contribute strongly to meeting the EU's RES targets for both heat and electricity in 2020. A significant majority of the biomass required can be produced within the EU. In order to realise this potential, primary supply of solid biomass and biogas within the EU will have to increase substantially. We estimate a feasible increase of 82 Mtoe in 2010 to 120 Mtoe by 2020 (with additional import of up to 40 Mtoe). This increase in EU biomass production will not occur without introduction of significant additional supporting policies and measures. Forecasts suggest that electricity production from biomass will increase from 90 TWh in 2006 to between 200 and 360 TWh in 2020. Utilities are playing a major role in developing this growth in biomass fired power generation. Biomass is an essential part of the renewable portfolio; unlike other sources of renewables, it can provide base load power generation and heating, and can also be utilised in existing thermal plants. Furthermore, biomass can be used as fuel in the automotive and transport sector. We believe that in the medium term, use of biomass in all sectors – not just energy - should be subject to sustainability requirements. In developing criteria, through an open, consultative process, we find that the Commission should make use of lessons learnt through existing voluntary schemes and legislation. It is important that sustainability criteria are proportionate.

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)	No (explain why)
Please explain why -open reply-(optional)	
European electricity networks, in general, need to be modernized and built out. This is particularly the case for the integration of huge amounts of variable renewable energy from sources far away from the large European consumption areas. All need to abide to the same legislation, but in this light it is imperative that an area such as the North Sea is prioritized politically to ensure the gradual emergence of a coherent North Sea grid. Imports of renewable electricity to the south of Europe from third countries is a development project with a longer time horizon, with great uncertainties, including uncertainty of the need of third countries to use their RES supply for their own increasing energy demand.	
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)	
Considering the great potential of renewables for the growth and jobs agenda in the EU, and the huge potentials for resource optimal exploitation of available renewable energy sources, it is imperative first of all to make full use of the cooperation mechanisms between member states that is already established in the directive.	
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)	
Regional cooperation needs to be reinforced to ensure cost-effective deployment of renewables and infrastructure planning. In particular, it is advised to look into the conclusions of the Intelligent Energy Europe sponsored Windspeed study on cost effective sites for offshore wind in the North Sea.	
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)

New, low-carbon energy system should be complemented by stronger focus on full innovation chain and on research, development and demonstration (RD&D). Enhanced RD&D is needed to propel low-carbon technologies towards competitiveness, enabling them to compete on a level playing field with other technologies. The success of RES in the future is highly dependent on our ability to innovate, both with respect to developing individual technologies, but also in the implementation and use of technologies in the overall energy system. The dominating instrument in technology development is a long term framework for research, development and innovation. More focus on issues related to integration of renewable energy is needed. A large part of the support for new energy technologies is allocated directly or indirectly to renewable production technologies. System integration is an important part of utilizing RES in the energy system, requiring evolution of new technologies for system integration and not only technology development. Still, technology development of individual RES technologies need to be supported, if the vision of carbon neutrality in 2050 for the energy sector has to be fulfilled. There is a lot of opportunities to increase technology performance and cost-competitiveness, and this opportunity as to be followed up by support. Furthermore, new immature technologies could show large potentials in the future, and this needs to be included in long-term visions.

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)

Biorefining & green gas

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)

Too much focus on basic research. For the sake of basic research Too little focus on industry involvement and to weak linkages to commercialisation of new inventions. Too large partner groups makes projects ineffective and difficult to manage. Too bureaucratic procedures for applications and project management. Involvement of industry in Technology Platforms and Industrial partnerships is a promising step in the right direction towards developing relevant growth oriented strategic research agendas with higher success rates. The European support system should focus on strategic research agendas around defined Grand Challenges such as energy security of supply and climate change – not on investments in basic research and research infrastructure.

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)

No. Support for RD&D should be linked to participant's ability to solve specified problems.

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)

Belgium

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>Yes, a mandatory target at EU level is appropriate</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>Binding targets have proven to be more effective in progressing towards the EU's 2020 targets. Targets should be set within a framework that looks towards long term objectives in order to plan for the remaining interim needs and to secure maximum contribution from investors and businesses. With this in mind, we believe that a high level of efficiency and renewable energy should be together as mutually reinforcing fundamentals of the EU climate and energy policy strategy.</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>Other (please specify)</p>
<p>Please specify which other policy elements? -open reply-(optional)</p>	
<p>strategies to enable the commercial deployment of technologies and implementation of demand-response should be put in place in the run to 2020 and pursued in the mid-term.</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>For selected technologies/circumstances/markets (please specify)</p>
<p>Please specify which technologies/circumstances/markets -open reply-(optional)</p>	
<p>It may be possible that for some sectors/circumstances and markets support is still necessary. Assuming however, that the current set of legislative measures (RES, EPBD, ErP Lots 1,2,10,11, EED) is properly and swiftly implemented in Member States and that a level playing field for subsidies is achieved, RES technologies, also for heating and cooling should see strong growth in the next six years. Impact on systemic efficiency and the use of renewable energy is biggest if action (and financing) is immediate. Beside future support, a strong focus and measures to jump-start efficient, currently available technologies are necessary. Emphasis should be put on smart-grids enabled technologies and facilitation of demand response programmes. Investments in some technologies such as smart meters will deliver the full potential only if they are future proof and can support a market for energy services and smart devices. The residential sector is thus a crucial part to be involved and users should receive support for behavioural change. Indeed, smart appliances and energy management systems are a central part of smart grids integrating a larger proportion of energy from renewable energy sources. Smart appliances provide systemic benefits for consumers, who should receive guidance, but they should not be mandatory. Introduction of smart appliances on the market cannot be done through minimum requirements. To create a sufficiently large installed base interacting with the smart me</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>B.4. Should the structure of financial support be</p>	

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)

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)

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)

Other (please specify)

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

Rules favouring the deployment and use of demand response, such as time of use tariffing, forecast of aggregated power production and

consumption, forecast of green energy production. There is a virtuous relationship between greener electricity generation and demand response, for example through the use of smart appliances. Smart appliances that by default shift consumption out of peak periods, or which, through information, encourage consumers to do so, increase the likelihood that energy sales companies can maximize the use of their greenest energy sources and minimize the energy waste associated with a disproportionate amount of demand occurring during peak periods and insufficient demand occurring when renewable energy is available.

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)

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)

Develop demand response to market signals: reward consumers for their environmentally-friendly choices and the benefits they provide to the system.

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)

Other (please specify)

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

A strong focus and measures to promote efficient, currently available technologies are necessary so that key barriers are overcome by 2020. For the heating and cooling sector additional barriers will however still be relevant, such as education and Training for installers, the broad public (awareness raising) but also better information sharing with legislators. A strategic Research Agenda for heat pumps with stronger focus on innovation and research ensuring efficiencies and contribution to renewable targets would be useful as well.

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)

We believe the question should include all renewable energy sources as defined in the 2009/28/EC, thus hydrothermal and aerothermal energy needs to be added. Considerations on renewable energy should therefore integrate all types of ambient heat that can be made useful by heat pumps (air, water and ground).

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)

It should be remembered that heat pumps are using an important share of renewable energy, thus replacing fossil fuels and consequently reducing emissions (in general, but in particular at the point of operation). In order to tackle the increasing energy demand, energy efficiency needs to be in focus. Necessary measures are: - alignment of policy measures in the heating and cooling sector is therefore important: requirements from building legislation, eco-design, energy efficiency and use of renewables legislation should be coordinated in order to continue ensuring the necessary market pull and push. Correct implementation of the Eco-design implementing measures and further market surveillance are important with this regard.

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)

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)

As investments on the smart grid are being made, it should be ensured that signals from the Grid to the household offer full interoperability within EU countries. This is a prerequisite, since only an EU wide market can justify the investments needed for smart devices manufacturers.

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)

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)

United Kingdom

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, an indicative and non-legally binding 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)

The binding 2020 targets for renewables and carbon emissions have been beneficial, providing increased support and a higher profile for renewable energy. However, they have also introduced conflicts with other EU policies, e.g. EU ETS and the internal market, which will become more pronounced as the renewables share of the market increases. What is needed now is not a focus on targets, but a system approach which includes the networks. In the UK the focus of the Electricity Market Reform is on a carbon floor price and on delivery, rather than targets. Indicative renewables targets could be useful in the medium term, to provide some certainty to investors.

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

-multiple choices reply-(optional)

Other (please specify)

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

Member States urgently need to reduce the length of time taken by permit granting procedures for energy infrastructure projects. ENA supports the proposals in the EU Infrastructure Package, including the one-stop shop and reduced time limits.

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)

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)

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)

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)

We consider that the length of time taken by some administrative procedures is the most important and urgent issue to be dealt with. Member States urgently need to reduce the time taken for permitting decisions on infrastructure projects. We support the proposals in the Infrastructure Package including the one-stop shop and reduced time limits for Projects of Common Interest.

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 Renewables 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)

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

The suite of EU network codes which are being developed by TSOs under the 3rd Energy Package should address many of the issues associated with the integration of electricity from renewable sources into the grid. It will be essential that DSOs can participate fully in the code drafting process since they have responsibility as grid operators for the majority of new renewable connections.

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)

The obligation for the network operators to develop the network is a political issue, concerning market design, which is primarily the responsibility of Government and regulators, but working closely with the network operators on the detail. Giving priority dispatch and guaranteed network access for RES generation as required by the 2009 RES Directive should not exempt these generators from their scheduling and balancing obligations.

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)

Other (please specify)

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

Variability at unprecedented levels will have to be managed, with major implications for the operation of transmission and distribution grids. Demand side measures, smart grids and new interconnections will be needed to balance the system. Research, development and deployment will speed up this development. The challenge the grids face in managing variability will in turn require technological innovation and substantial investments, as well as an appropriate and predictable regulatory framework that provides the network operators with the right incentives.

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)

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)

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)

The North Sea Countries Offshore Grid Initiative should provide the political leadership that is needed at the regional level to optimise the offshore wind potential of the North Sea. It is too early to say if this could be a template for other regions.

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)

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 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, an indicative and non-legally binding 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)	
The introduction of mandatory targets has had a number of unwanted side-effects, in particular related to the raw material situation in the woodworking sector. In order to achieve the targets set by 2020, several member states have, in their national renewable energy action plans, put a strong focus on the use of biomass. As wood is one of the most commonly used and targeted biomass sortments, a fierce competition has grown between operators in the woodworking and the energy sector. As the latter in most cases have been able to benefit from subsidies promoting the use of renewables, this has led to a strong increase in prices and further accentuated unfair competition.	
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 - 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)	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)	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)	
No continuation of financial support for biomass in circumstances/markets where the support mechanisms are distorting the markets for wood raw materials	
Please specify for which technologies (if applicable) to phase out support schemes over time -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	Yes, with EU-wide benchmark values for support level per technology

choice reply-(optional)	
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)	
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 schemes for renewables have and are strongly distorting the markets for woody biomass, a raw material not only for energy production, but also the primary feedstock for e.g. the wood-based panels industries, putting these sectors under extreme pressure.	
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)

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 - 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)

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)

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)

Geothermal - 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)

EU Member States put a lot of emphasis on biomass rather than other energy sources to achieve their goals. Have these Member States investigated the achievability of their plans?

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)

Producers of today items/technologies using non-renewables

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)

Any fuel should comply with basic sustainability requirements. For biomass for energy derived from forests, this has to comply with the same sustainability requirements as demanded for other forest-derived products and material. Sustainability has to reconcile and consider the three pillars: economy, ecology and social aspects. Due care should be taken to ensure that suitable wood assortments are used first to produce wood products and that the "cascade" principle is applied.

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)

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)

The woodworking sector already plays an important role as producer and user of renewable energy based on production by-products and bark. It supports the trend towards a new generation of biofuels but insists that this should not impact the traditional user of wood as raw material.

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)

Belgium

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)

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)

- A properly functioning ETS - policies to internalise external costs of pollutants - offensive trade policies to open NON_EU markets - creation of an EU-wide well functioning electricity market - remove barriers to grid access and barriers in the form of administrative procedures

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)

The objective of the wind energy sector is to be competitive in a future level playing-field fully liberalised electricity market, and to deliver the benefits of wind energy in the most cost-effective way. The industry is committed to bringing down the cost of wind energy and already has a positive track record in this respect, namely thanks to continuous R&D efforts. The trend toward larger and more cost-efficient turbines has led to a significant decrease in the costs of wind power onshore while increasing full load hours, turbine life time as well as improving grid stability. In addition, economies of scale – driven by stable investment frameworks in the European markets - and improved concepts for transportation, operations and maintenance will play a major role in making wind energy more competitive towards 2020 and beyond. The success of onshore wind in bringing down costs will be replicated offshore in the coming years unlocking the exploitation of Europe’s largest indigenous and eternal energy source. In comparison with other power generating technologies, particularly nuclear and fossil fuels, onshore wind energy is rapidly improving its competitiveness and is the lowest cost zero-carbon technology available. Lowering and eliminating barriers to RES deployment and long-term, stable investment conditions reduces risk and costs and therefore the need for support.

<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>An ambitious, yet credible, long term RES target of 45%, supplemented by legislation on grid access, planning, intermediate targets, overseen by the European Commission, is critical to ensure that the industry can develop a sustainable economic model and business case going forward. RES financial support mechanisms should be designed to deliver more convergence, or made more compatible, as well as being highly effective and adapted to technology diversity and maturity. If “more market oriented” means responding to price signals, support mechanisms should be increasingly exposed and should encourage greater market responsiveness as RES technologies mature and penetration levels increase. In a well-designed and functioning market, producers should take an active part in making the market as efficient as possible, as is increasingly the case with wind energy in Denmark, Spain and Germany. RES cannot and should not be seen in isolation from the rest of the power market, but it must be recognised – as it is in the introduction to this consultation – that renewable energy support mechanisms are “necessary due to a number of market failures and imperfections”. If these market failures could be addressed effectively, the need for support to newer, cleaner and smarter renewable energy technologies would significantly decrease. Market compatibility is not only something to aim for when it comes to mature renewable energy technologies – it should be an aim for the entire European power</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 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)</p>	<p>Length and complexity of administrative procedures relating to authorisation/certification/licensing - Lack of commonly agreed technical specifications - Lack of credible and certified training and qualification</p>
<p>C.1.1. Please provide explanations and specific examples where available</p>	

-open reply-(optional)

The main issue with administrative procedures is not so much definitive refusals, but the lack of binding deadlines, delays and lack of clarity and guidance in the procedures. Based on our WindBarriers survey, the average administrative lead time in the EU is 42.32 months for onshore wind energy projects, and ranges from 18.06 months to 58.03 months. The EU average for grid connection lead time is 25.8 months for onshore projects, and ranges from 2 months to 46.6 months. The average total lead time in the EU is 54.8 months for onshore wind energy projects, and ranges from 25.88 months to 76.08 months. These lead times act as a serious impediment to the development of wind projects in the EU. But this is also the case for the lack of harmonised rules for grid codes. The way in which grid code requirements for wind power in Europe have developed has resulted in gross inefficiencies and additional costs for consumers, manufacturers and wind farm developers. Currently the European wind industry has to contend with a high degree of diversity in technical requirements in more than 30 differing National Grid Codes from a variety of countries. These requirements are often not sufficiently clear and are not always technically justified nor economically sound from the point of view of the power system. Such a diverse range of requirements drives up costs. Finally, in most Member States, there is a lack of certified experts and of trained civil servants to handle the expected applications.

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)

Obliging TSOs to develop grid infrastructure is not exclusively triggered by increased RES penetration levels, but also by the need to create an Internal Energy Market (IEM) to the benefit of consumers and for security of supply reasons. The grid is a common good and should continue being so, therefore shallow network connection charging regimes should continue to apply. Depending on how far the creation of a truly liberalised IEM will progress by 2020 priority access and dispatch for RES might still be necessary. Structural shortcomings in electricity markets should be addressed such as regulated prices, a high degree of market concentration and vertical foreclosure. Priority grid access and dispatch are a compensation to new entrants given there is no functioning internal energy market. They are necessary in the absence of effective competition and in view of the historical development of power generation – vertically integrated national incumbents having developed their power generation portfolio enjoying the advantages of a natural monopoly and passing on costs and risks on to the consumer bills. They are especially justified for non-dispatchable renewables like wind and solar. Were all the electricity markets to function properly and were they more adapted to variable RES (incl. shorter gate closure time in intra-day and day ahead), wind's low marginal cost would ensure that all wind generated electricity would be sold in the market ahead of any other technology.

D.3. With regard to system integration of wind and solar power, what measures do you

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

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)

Balancing risk – producers of renewable energy should bear balancing responsibility towards TSOs (if so, please specify how: responsibility on individual operator or centrally organised, same balancing rules for all operators or specific rules for variable generation?)

Balancing risk, please specify how: responsibility on individual operator or centrally organised, same balancing rules for all operators or specific rules for variable generation?

-open 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) - Current market arrangements are sufficient to reward flexibility

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)

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)

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)

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)

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)

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)

Technology performance and cost-competitiveness - System integration - 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)

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)

Czech Republic

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

Yes, an indicative and non-legally binding target at EU level is

<p>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>	appropriate
<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>strategy should copy the interests of each state</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 - Better financing possibilities</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>	No
<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>	Open up national support schemes to cross-border projects
<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>	Yes, with benchmark values for support level per technology per Member State
<p>B.4. Should the structure of financial support be gradually aligned EU-wide? -single choice reply-(optional)</p>	N/A
<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>	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>B.7. Do national support schemes and differences between such schemes distort</p>	N/A

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)

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)

I hope

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

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

level networks must be stable without fluctuations

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 ...) -
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)

Producers of renewable energy should bear greater responsibility for system costs - Balancing risk – producers of renewable energy should bear balancing responsibility towards TSOs (if so, please specify how: responsibility on individual operator or centrally organised, same balancing rules for all operators or specific rules for variable generation?)

Balancing risk, please specify how: responsibility on individual operator or centrally organised, same balancing rules for all operators or specific rules for variable generation?

-open 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)

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)

Costs/lack of financial support - 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)

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)

Costs associated with subsidies for renewables, disproportionately increasing the electricity price. This trend may be for us in the future liquidating

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

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)

No, the existing criteria are already burdensome to implement

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

I. REGIONAL AND INTERNATIONAL DIMENSIONS

<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? -single choice reply-(optional)</p>	<p>N/A</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>No, the EU should first focus on developing its own renewable potential</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>N/A</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>I do not know</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>	
<p>I do not know</p>	
<h2>J. TECHNOLOGY DEVELOPMENT</h2>	
<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? -multiple choices reply-(optional)</p>	<p>Technology performance and cost-competitiveness</p>
<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>technology for the possibility of electricity storage, technology for the minimum loaded electric power,</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</p>	

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)

I do not know

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)

Yes

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)

Netherlands

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)

Yes, a mandatory target is not only appropriate, but also necessary in order to achieve the energy transition from a fossil fuel based economy to a biobased economy in which security of supply and environmental are better addressed. A mandatory target has to be linked to clear (end) goals and requirements that have to be met in order to reach these targets the most efficient way: industry and research centers have to develop and commercialize technologies that enable the energy transition, and I do not believe we already can predict which renewable energy and or technology and which mix of technologies will give the best results and which mix is the most acceptable for society as a whole. An important factor that needs to be taken into account is that current assets should not lose their value due to mandatory targets combined with competition from outside the EU: which means that specific markets should be given possibilities to contribute to meeting targets, but not to the extent that they cannot compete anymore on the global market and are forced to relocate (comparable to EU ETS system). Most important: clear regulatory framework on which research institutes, industry and residents can rely to stay in force.

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

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

-multiple choices reply-(optional)	improved access to the grid and further grid investments, availability of more sites for renewables, etc) - Better financing possibilities - Continue to ensure sustainability and scalability - Other (please specify)
------------------------------------	---

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

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)

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 - Open up national support schemes to cross-border projects - 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)

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)	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)

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)

Alignment is required in order to achieve economy of scale, perform larger projects, and create also opportunities for energy storage capacity which is essential when solar and wind contribute a larger part of the energy mix. For heating and cooling I see less need for alignment than for electricity and transport, however I do not understand why the difference should be made based on these variables. I see alignment is required for making sure different member states are not developing different systems for e.g. transport fuel: logistics, fueling stations, vehicles. Since different incentive systems promote different fuels and logistic solutions. Not aligning will be much more

expensive for the EU as a whole, and causes delays. Also energy storage benefits from aligning support incentive, as does industry and research centres since it brings more - much needed - clarity in the requirements that technologies have to meet in order to meet the targets.

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 - Member States should open their support schemes to renewable generation from third countries

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)

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

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

-open reply-(optional)

Procedures differ between member states, but also within countries and regions. Clear example is that there are now many, many consultancy like agents and companies that earn their money with explaining how a certain administrative process should be done in order to comply and / or succeed. In addition, the requirements and procedures changes much to often without a clear change of the external context that makes this change necessary. As a consequence investors have to take into account a much higher risk. This makes obtaining financing more difficult that needed; there is enough risk connected to renewable energy and the energy transition already.

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

Balancing rules

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)

Additional energy storage capacity is required and grid operators and owners should not hamper the adoption of renewable energy into the grid (no protection for electricity or natural gas from fossil fuel fired power plants). This issue of grid balancing should therefore be addressed.

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

Other (please specify)

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

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

Priority or guaranteed access would be great, but not possible without investing huge amounts of money which can better be invested in developing storage options and in renewable energy capacity and technology improvement. People should become more a part of the solution and incentives should be implemented to stimulate energy storage / usage at homes and offices when there is enough renewable energy available.

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 ...) -
Increased availability of storage - Enable renewable generators to offer balancing services to TSOs

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 - Producers of renewable energy should bear greater responsibility for system costs -
Balancing risk – producers of renewable energy should bear balancing responsibility towards TSOs (if so, please specify how: responsibility on individual operator or centrally organised, same balancing rules for all operators or specific rules for variable generation?)

Balancing risk, please specify how: responsibility on individual operator or centrally organised, same balancing rules for all operators or specific rules for variable generation?
-open 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 - 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)

Building regulations etc. - Lack of awareness - Lack of suitable information - 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)

Biomass - Geothermal - 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)

Pace of technology development - Lack of standards - Lack of infrastructure - 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 - Road for goods - Rail - Water - Air

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

For all of the transport sectors there are suitable renewable alternatives (not the same) and all have great potential. Air is more difficult and will take longer, but also this sector is very promising.

H. SUSTAINABILITY

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

Yes, additional criteria should be introduced to promote only the best performing biomass (please specify which)

Please specify which criteria

-open reply-(optional)

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

Sustainability criteria for both fossil fuels and biomass should promote the best available cost-effective technologies. The overall goal is to secure energy supply and address environmental issues in the most effective way for people and planet. It does not reach this goal when biomass is causes food prices to increase, while more sustainable technologies to convert biomass are not utilized.

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)

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

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

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)

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)

Yes.

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)

Other (please specify)

Which other country? -open reply-(optional)

United States

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 - 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)

Renewable energy remains a critical pathway for reducing EU GHG emissions, because it is both scientifically possible and economically feasible. Significant progress has been made in the past few years to improve the contributions of renewable energy to sustainability in society and environment. This progress, mostly through certification schemes and other forms of verification, can ensure that renewable energy delivers on its promise.

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) - 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)

When a promising technology is not yet commercially viable to the point of reaching an appropriate scale, and the technology can be verified for positive contributions to sustainability, then financial support may be merited.

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 - Open up national support schemes to cross-border projects

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)

B.7. Do national support schemes and differences between such schemes distort

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

competition? -single choice reply-(optional)

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 information on support schemes or other

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)

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

<p>E.2. How can it be ensured that market arrangements reward flexibility? -multiple choices reply-(optional)</p>	<p>Current market arrangements are sufficient to reward flexibility</p>
<p>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)</p>	<p>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)</p>

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

F. RENEWABLES IN HEATING AND COOLING

<p>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)</p>	
<p>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)</p>	

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

<p>G.1. What do you consider to be the main barriers against a stronger uptake of renewable energy in transport? -multiple choices reply-(optional)</p>	<p>Limits of availability of sustainably produced biofuels</p>
<p>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)</p>	<p>Road for passengers - Road for goods - Air</p>

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

Air and road represent the most promising sector for further increasing the share of renewable energy. This is because these sectors are most responsive to demand elements beyond price. The sustainability benefits of renewable fuels will resonate more strongly with road and air fuel customers than it will with rail and water fuel customers.

H. SUSTAINABILITY

<p>H.1. Do you think that additional sustainability criteria are necessary in the post 2020 period? -multiple choices reply-(optional)</p>	<p>No, the existing binding sustainability criteria are sufficient</p>
--	--

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

Additional sustainability criteria, beyond what already exists, would be costly to verify. Ultimately, the selected verification methods, if they are truly viable, would be mostly ineffective at verifying sustainability performance. The current criteria are the best approach for eliminating negative impacts of biofuels while not being burdensome to implement.

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)

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)

Cooperation should be promoted with third countries that will prove primarily responsible for the production of raw materials and feedstocks used in renewable energy. With additional cooperation, the EU risks limiting its supply of materials and feedstocks, and this could hinder its ability to meet renewable energy targets.

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)

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)