

Stakeholders must act together and with no further delay to make infrastructure development happen!

- The proposed Regulation on infrastructure represents a step forward to bring concrete and effective solutions.
- EU co-legislators, supported by all stakeholders, shall fast-track the discussion and reach agreement on the details asap if PCIs are to be chosen in a timely manner
- The regulation should empower project promoters, member states, NRA/ACER and the EC to come up with a European grid which supports the EU energy policy objectives
- Greater clarity is needed about EU financing, i.e. the €9.1 billions under the Connecting Europe Facility
 - ⇒ How will the EU money be divided among the different categories?
- However improvements on national level are also needed

Energy infrastructure: key issues to be addressed (1)

- Selection of PCIs and the TYNDP (Chapter II):
 - Inconsistency between Chapter II and Annex III
 - Chapter II: Once the EU-wide list is drawn, "PCIs shall become an integral part" of the TYNDP
 - Annex III: "proposed electricity transmission and storage projects shall be part of the latest available" TYNDP
 - So, what comes first?
 - Once projects have gone through CBA assessment, and have been included by the EC in the EU-wide list, their status shouldn't change unless commissioning is delayed => remove art. 5 (7) (a) and (b)
- Permit granting and public participation (Chapter III)
 - Measures on one-stop shop and time limits are particularly welcome!
 - Wording on legal challenges to the permit decisions looks weak => "most efficient way possible"; this should be further defined by the co-legislators
 - Environmental regulation should be adopted accordingly

Energy infrastructure: key issues to be addressed (2)

- Regulatory treatment (chapter IV)
 - Independent and transparent cost-benefit analysis, and consultation of stakeholders are necessary
 - Wording of art. 13 (“Enabling investments with XB impact”) seems to exclude the possibility that merchant interconnectors can become PCIs => to be clarified
 - Incentives in art. 14 are welcome => but need to be clearly focused to projects which cannot be financed without additional support
- Electricity storage is not a regulated activity!
 - Consistency with the unbundling regime laid down in the 3^d Package is of the utmost importance and shall be checked
 - TSOs shall not be allowed to own or operate storage facilities, in particular hydro pumped storage which clearly represents a generation asset that should be developed in a market context
 - No justification for a differentiated approach to electricity storage
- Beyond the scope of the infrastructure Regulation, finding appropriate funding to invest in the distribution grid is key to reinforce and modernise existing LV/MV infrastructure