4. QUESTIONS

4.1. General

Which lessons from the 2020 framework and the present state of the EU energy system are most important when designing policies for 2030?

- The importance of setting ambitious and real objectives in a long-term as the only way on going on.
- If the improvements in efficiencies and costs, due to the technological development, are maintained at the same or little less rate than the last 17 years, we can find with a situation different from currently with:
  - Higher weight of the electricity in the energy consumption.
  - A substantial reduction in renewable resources´ costs of exploitation.
  - Greater technical capabilities and the minor costs in energy storage.
  - Increased presence of distributed generation, which will mean more and better (more intelligent) grids.
- The review of the current asymmetric model with "atomized consumers" and energy providers in an oligopoly, will be the key to obtaining an efficient energy market in the future.
  The lack of a regulatory stability has slowed the investment in renewable and energy efficiency. Furthermore the dependency from legislation and subsidies makes the profitability on investment will be not real.
- Create the scenario for companies in order to compete in a single market. regarding of national energy plans, its compliance is not binding and this provoke their not complete implementation. European companies are losing competition with other Asian, American companies.
- The market of CO2 should be upgrade to make it a real situation, because currently it can make buying emission rights in third countries.
- With regard to the energy market will have visions more integrated than the current, since in practice only it is divided into electricity, gas and oil. The growing importance of renewables, grids and energy savings (which in terms of volume would reach the volume of a renewable energy source) would require another new division.

  Perhaps with a division depending on the nature of the consumption (electricity, heat and transport) could be offered insight a view able to understand and solve problems

4.2. Targets

Which targets for 2030 would be most effective in driving the objectives of climate and energy policy? At what level should they apply (EU, Member States, or sectoral), and to what extent should they be legally binding?

- The importance of establish ambitious and realistic objectives(from bottom-up) in a long term, as the only way to go on.
- The commitments should be national (and European in addiction) and legally binding, with the already existing coercive instruments in the European Commission to enforce them.

- By "nature" could be estblish the next kinds of targets:
  - In market: Demanding high market shares per company in each country, legislation that facilitate the entry of new operators in Europe and with a limitation of the maximum consumer costs which should be also homogeneous across countries.
  - In the presence of renewable: Demanding supply quotas with renewables, for electricity generation, thermal consumption and transport for each country.
  - In CO2 emissions: Demand the assessment for the fulfillment of the objectives in renewables and energy efficiency & savings. Demanding the internalization of environmental costs during its whole life cycle (not just CO2) of the energy sources.
  - In Saving and Efficiency energy: Requiring maximum energy intensities for productive sector and country.

Have there been inconsistences in the current 2020 targets and if so how can the coherence of potential 2030 targets be better ensured?

- There is no big inconsistences, except maybe the next:
  - Some energy efficiency policies have consolidated a consumption of fossil fuels (especially natural gas), while the renewable policies have tried to replace.
  - The introduction of biofuels has not been coordinated with European agricultural policy, resulting than there is a number of biofuel plants almost stops in Europe, an opportunity cost for farmers and the consolidation of imports that wanted and can be changes from petroleum to oil or biodiesel directly.
  - In certain countries there is little competition between companies, giving them a market position too favorable to interests that are not aligned with those of the European policy towards more competition or promotion of energy saving and renewable energy
- With regard to companies working in the sector monopolistically, this companies should be motivate to align their interests with those of the European Union, before they are others who do. Regarding the inconsistency between energy efficiency and renewable, it should be forbid any support to increase the use of non indigenous fossil fuels.
- Regarding the issue of *energy certification of buildings*: is implemented in a very different in every country and involving high costs, due to the lack of a standarization method and more specific regulation specification imposed by the Commission. And those costs are going to impact on the final consumer. Standardization and more specific legislation will to the implementation of this king of policies.

Are targets for sub-sectors such as transport, agriculture, industry appropriate and, if so, which ones? For example, is a renewables target necessary for transport, given the targets for CO2 reductions for passenger cars and light commercial vehicles?

- There is not enough information to know whether the targets for sub-goals such as transport, agriculture and industry are suitable or not.
- It is considered necessary a target for renewable energy.

  In fact the question is implied a serious error concept because can be understand that the development of renewable energy is only justified by the environmental impact.

Renewables also:

- provide an opportunity for rural development, employment, industry, logistics, european SMEs, etc ..., that can not be provide the consumption of fossil fuels.
- Diversify (making it more reliable) not only the the type of resource but also the geographical origin of energy supply
- Their generation costs are decreasing in time for its technological young grade of maturity, being already, in some cases, competitive with conventional systems.

How can targets reflect better the economic viability and the changing degree of maturity of technologies in the 2030 framework?

- For 2030, most energy technologies, except perhaps nuclear fusion, can be considered to have already, for at least five years, at a stage of technological maturity. At that time some of the technologies provide a binomial cost of generation / manageability that have done if not disappear if leaving them in marginal use.

  (Manageability (as to ensure at all times the production of a particular energy source) not only applied to electricity generation, but also the heat supply or transport. In the manageability concept would be included the capacity to supply the volume demanded by a particular consumer.)

- The only way will be to predict the above binomial for each technology for the period 2020-30 and then to take a first alternative of energy mix to be confronted (in terms of both real and opportunity cost) into concepts such as: environmental impact, economic development, employment, industrial competitiveness and the export of equipment or technology, competitiveness, security of supply to contingencies, etc..
- Not only should be invest efforts in energy technology innovation, but also more advanced innovation in processes that lead to a reduction of energy consumption and involve also CO2 reduction. There is a tendency to protect the competitiveness of enterprises too much.
- It must be maintain a general concept of common Policy, with a stable financial framework, as well as common fiscal policy.

How should progress be assessed for other aspects of EU energy policy, such as securuty of supply, which may not be captured by headline targets?

- Depending on the fulfillment of quantitative milestones that have been established before when it was designed how it would assess the progress of the other objectives/ aspects of European energy policy.

4.3. Instruments

Are changes necessary to other policy instruments and how they interact with one another, including between the EU and national levels?

- Yes, the European Union can, by the mandatory nature of their promulgated rules, support the countries in their fight against the various and powerful interests that exist as oligopolistic and very strong markets such as the energy is.

  It would not be a problem the creation of new instruments, but using the existing ones to help states to meet national objectives and by adding the Europeans objectives . The national level should take into account directly the regional level.

Policy instruments should be continuity and should control the established monitoring indicators. For example: biofuel plants in Europe are in very low percentages of production, because allow of import biofuels from out of Europe such as Argentina, Indonesia...

How should specific measures at the EU and national level best be defined to optimise cost-efficiency of meeting climate and energy objectives?

- With a model based on a precise knowledge of the present and foreseeable medium and long term energy market in all its aspects (energy, environment, business, economic, etc.., etc..) and knowing the different objectives where to reach, and it can define bottleneck situations, or the missed opportunities.
- The measures will resolve such situations, and will be clear about: responsibles; milestones; resources (human, financial, regulatory, technological, etc.; contribution to the general objectives and the resolution of the aforementioned situations; consideration of the singularities of each submarket and actors, etc..
  - It will be required a control system for the measures with two functions: Audit the group of measures to ensure that, at every time, this group contains the necessary, but also sufficient, for, starting from the current situation, to reach the foreseen 2030 targets.
  - Audit the diverse responsibles of the measures, whether they are fulfill the planned milestones and if the milestones approach or not, according with the general foreseen objectives fulfillment.

How can fragmentation of the internal energy market best be avoided particularly in relation to the need to encourage and mobilise investment?

- Stand up first to those countries (France and Italy?) in which the pseudo monopoly is present.
- Establish maximum quotas by national markets in each of its various submarkets in which the energy is divided (electricity generation, fuel distribution, heating networks, etc..)
- Promote competition between markets and exchange of assets in different markets, as well as eliminate any regulatory barrier that might exist at the entrance of a new player in another market different from their own home market.

Which measures could be envisaged to make further energy savings most costeffectively?

- Implement energy efficiency measures through public resources, strengthens the fossil fuel consumption in a European policy that seeks its elimination.
- Informing and trainin the final consumer how to act.
- Allocate more resources for innovation in processes, not just technology.

How can EU research and innovation policies best support the achievement of the 2030 framework?

- It looks appropriate to establish different horizons in the R & D policies, one in 2020 and then 2030. In this sense, it must establish R & D programs that which provide to industry trade technologies at the end of each timeframe.

- It seem necessary to make a very intense reflection,in the beginning and less pressure maintained over time, about the technical - economic characteristics of the favorite technology users (European and non-European) in 2020 and 2030.
- That reflection will be conducted between administrations, technological centers, consumers and industry and will be offering the "purchase specifications" on which R & D policies should be established.
- Three could be the main lines of R & D:
  - Increase efficiency between energy and useful energy resource, regardless of the equipment would be a wind turbine, a solar panel, a photovoltaic cell, or a methanation process. Supporting R & D on carbon capture and storage or other systems to stay profitable to the indigenous fossil fuels, which support the development of local economies.
  - Reduce generation costs: cheaper materials, cheaper manufacturing processes, lower installation costs, O & M or obtain the resource for example biomass, shorter logistic models and intelligent, etc..
    - Increase manageability of facilities, improving:
    - predictability of solar or wind production.
    - efficiency energy storage systems.
    - the integrated operation of different energy generation units, at all times, to ensure production according with demand.

4.4. Competitiveness and security of supply

Which elements of the framework for climate and energy policies could be strengthened to better promote job creation, growth and competitiveness?

- The use of renewable resources compared to the alternative of using non-indigenous fossil resources or nuclear fission energy, provides a clear positive balance for employment, growth and competitiveness in a medium and long term.

  This will be necessary and enough condition to be especially persistent in reducing costs and increasing manageability, which will take than some technologies get priority over some others or some of them being relegated, in a natural way, to specific contexts or niches.

What evidence is there for carbon leakage under the current framework and can this be quantified? How could this problem be addressed in the 2030 framework?

- The “environmental dumping”. It can be include deterrent duties for products that are benefited by carbon leakage.
- Specific International agreements for specific industries most exposed to carbon leakage.

What are the specific drivers in observed trends in energy costs and to what extent can the EU influence them?

Drivers in observed trends in energy costs	Influencie in the EU
× Oligopolistic markets.	× Permanent surveillance in the agreement price. × Maximum market fee participation. × Openness to new operators.
× Regulations which overestimate capacity payments	× avoid that kind of practices, with a standardization of the different regulations at least to a minimum.
× Regulations in favor of tariffs based more on fixed terms variables	
× Cargas impositivas nacionales o regionales injustificadas tanto al proveedor de energía como al consumidor final. × Unjustified national or regional income taxes, for both energy supplier and final consumer.	
× Higher costs of generation in certain technologies	× Smart as massive support for RTD, based on a industrial capacity able to support it. × Standardization of public subsidies in the different member states. × Joint public support with the reduction of costs, or the improvement of manageability. × Promote the networking between generators and users through more intelligent grids
× Increment without EU control of selling prices of some fossil fuels such as oil, gas.	× Coordinar todas las negociaciones a escalas nacionales y empresariales consolidándose como un único comprador de 504 mill. de consumidores × To favor the stability of producing countries. × Increased the diversification of the supplier countries. × Coordinate all negotiations at national and business levels, consolidating as a single purchaser of 504 millions of consumers.

How should uncertainty about efforts and the level of commitments that other developed countries and economically important developing nations will make in the on-going international negotiations be taken into account?

- Respecto a las emisiones de CO_2, soslayando su efecto ambiental, el mantenimiento de las exigencias actuales facilitarán la exportaciones de equipos renovables al exterior y la presencia de empresas europeas en dichos mercados.
- The American commitment for gas and petroleum shale can be an opportunity to make it Europe as the only leader in technologies that make efficient use of renewable resources, with the support in the first stage of cheaper fossil fuels to reduce American acquisition such fuels.
- With regard to CO2 emissions, a part of the environmental effect, maintaining the current requirements will facilitate the export of renewable equipments abroad and the presence of European companies in those markets.

How to increase regulatory certainty for business while building in flexibility to adapt to changing circumstances (e.g. progress in international climate negotiations and changes in energy markets)?

- Being continuity in the regulations and without gaps, which create uncertainty to the markets.

How can the EU increase the innovation capacity of manufacturing industry?

- Creating direct economic incentives to companies that present concrete proposals for innovation.
- Encouraging vertical business cooperation ("cooperate with my customers and suppliers inside a value chain").
- Developing a generous annual support program, perhaps like a competition, companies or consortia which achieve certain technological or industrial targets as well as adaptability of products to markets outside the EU.

(industrial targets: Examples: "prize of 100 M € to anyone manufacturer or consortium which for three years will be able to generate with wind turbines over 1 MW below 30 € / MWh", "€ 1 M€ of prize to the manufacturer or consortium that achieves thermal solar panel with certain features below 10 kg ", etc.)

- Joint systematically aid programs to renewable energy production, cost effective reductions and substantial increases in efficiency.
- Avoid in member states support programs that have no a target in time, or that are not linked a improvement target of market competition.

Is there a role for the revenues from the auctioning of allowances?

- The improvement of the internalization of environmental costs of fossil fuels, as the auctioning of allowances not resolves clearly it.

How can the EU best exploit the development of indigenous conventional and unconventional energy sources within the EU to contribute to reduced energy prices and import dependency?

- It should be clearly differentiate the treatment given to an indigenous fossil fuel, which carries a local economic development than the non-indigenous fossil fuels. Obviously using indigenous fossil energy sources (whether obtained from conventional mode or not) will decrease imports.
- Regarding the price of energy will decrease only if the price of generation is less than its equivalent for imported fossil fuel.

How can the EU best improve security of energy supply internally by ensuring the full and effective functioning of the internal energy market (e.g. through the development of necessary interconnections), and externally by diversifying energy supply routes?

- En cuanto al funcionamiento pleno y efectivo del mercado interior de la energía, posiblemente sea más necesario incidir en dotar a las empresas de una visión de mercado europeo y luchar contra los oligopolios nacionales, que en desarrollar infraestructuras de conexión, que por supuesto también son necesarias.
- Using with the maximum efficiency the indigenous energy sources as it was answered in the previous question.
- For a full and effective working of the internal energy market, it is possibly make more necessary to provide the companies with a European market vision and combating domestic oligopolies than developing connecting infrastructure, which of course are also needed.

4.5. Capacity and distributional aspects

How should the new framework ensure an equitable distribution of effort among Member States? What concrete steps can be taken to reflect their different abilities to implement climate and energy measures?

- In general, the efforts have to be paid by energy consumers, not by the citizens as a whole (which means by taxpayers in the form of a single premium per unit of energy consumed).
- These efforts are an investment for the consumer who is funding policies today that will get, in the future, a lower energy costs and greater security, as well as that in the region there will be a new economic sector associated with renewable energies and energy efficiency.

  It is particularly interesting that in a systematic way the consumer is informed of the cause - effect on the efforts and progress in cost and manageability.
- It appears that a significant part of the energy consumer effort (for example. 30-40%) can be allocated into a fund managed by the EC for innovation programs, R & D and business cooperation in the energy field with supranational vision .

What mechanisms can be envisaged to promote cooperation and a fair effort sharing between Member States whilst seeking the most cost-effective delivery of new climate and energy objectives?

- Being maintain financial instruments to facilitate and encourage investments in renewable energies and energy efficiency which have already been successful in the past.
- Encourage public-private financial initiatives with the support of financial entities.
- Remove technical and administrative barriers that impede consumer access to energy services.
- The establishment of the National Energy Efficiency Fund to activate resources to finance new investments in energy efficiency projects, as outlined in Article 20 of Directive 2012/27/UE.

Are new financing instruments or arrangements required to support the new 2030 framework?

- Respecto a los fondos, la financiación de los mismos como parte del esfuerzo de los consumidores, previsiblemente serian más que suficientes.
- Not really, the European Commission has sufficient financing tools on going or planning to develop and enforce the regulation fulfillment. In this way EC should take into account the role of the regional and local energy agencies, most of them created with European support, as entities able to support and manage financial instruments in the next period because they are entities which know nearly the energy sector, and are already points of reference for all stakeholders. In this sense, the new framework 2030, should take into account this idea where the states will be the transposition of the policies from the European level and the executors of those policies would be the regional and local levels, if they are previously provided of financing instruments for that implementation.
- With regard to funds, the financing of them as part of the effort of the consumers, would be more than enough.