

Responses to the Commission's remarks
regarding the National Renewable Energy Plan
EU Pilot: No 1733/11/ENER

1. Commission remark: Tables 1, 4b and 12

- *A share of 7.8% for renewable energy in transport in 2020 is estimated in Table 1. This is a breach of the Directive's provisions on the mandatory target for renewable energy in transport (10%). In addition, the figures provided in Table 4b and Table 12 for the total quantity of RES in transport seem to be inconsistent and they do not lead to the same share: 8.3% and 7.8%, respectively. All the aspects mentioned in this section should be clarified and corrected.*

Comments:

This remark is correct. The original plan was based on data from the forecast document, and these are not high enough to meet the target for 2020. Adjustments have been made, and the figure for the quantity of biofuels and electricity[sic] in transport has been increased. The tables have been corrected.

Response: Tables 1, 4b and 12 have been corrected so as to ensure that the mandatory target of a 10% renewable energy share in transport is met, and the inconsistencies noted have been rectified. A corrected forecast of trends in the transport sector up to 2020 has been used and Chapter 2, Sub-chapter 3.1 and Tables 2, 3a and 4a have therefore been amended.

2. Commission remark: Table 3:

- *The 2005 figures for renewables in heating and cooling (RES-H&C), renewables in electricity (RES-E) and renewables in transport (RES-T) do not match the calculations made by the Commission services. This calculation should be checked (e.g. if there is no expected renewable energy contribution to transport for the purposes of the RES-T target (Row J in Table 4b) for 2005, the RES-T share for 2005 in Table 3 cannot be 1.2%, it has to be 0.0%).*

Response: Tables 3 and 4b have been corrected.

- *The RES-T figures for 2018-20 differ from the calculation made by the Commission services. This calculation should be checked as well.*

Response: Checks have been made in relation to the target set for energy from renewable sources for the 2018-20 period. Table 3 has been corrected.

3. Commission remark: Authorisation procedures (4.2.1):

- *The plan identifies several obstacles in authorisation procedures, but the planned measures for dealing with these issues are mainly soft measures (e.g. improving administrative capacity), and there is a lack of legal basis for improved coordination and simplification of procedures. This appears to lead to a lot of different procedures at local level. Further information should be provided on whether harmonisation through legislative measures will be enacted and how this will be done.*

Response: The draft Renewable Energy Act provides for the streamlining and improvement of procedures.

Information on the measures provided for in the draft Renewable Energy Act (ZEVI) has been added to 4.2.1.¹

4. Commission remark: Buildings (4.2.3):

- *It is stated that minimum requirements for renewables in buildings will be established as part of implementing the EPBD; further details of such obligations and a timeline for the adoption of the relevant national legislation should be provided.*

Response: Details of measures planned under the Renewable Energy Act and certain actions to be undertaken in the context of transposing Directive 2010/31/EC on the energy performance of buildings have been added to 4.2.3. The new wording is to be found at (c) and (d) in 4.2.3.

5. Commission remark: Grid development (4.2.6):

- *More information on the concrete steps foreseen for the development of intelligent networks, information technology tools and storage facilities [4.2.6 (c)] should be provided, particularly detailing specific measures to be taken, the calendar for implementing the respective measures and the method/way to implement the measures.*

Response: The wording of 4.2.6 has been updated and additional information on the development of intelligent networks, information technology tools and storage facilities has been provided on the basis of data supplied by the operators of Bulgaria's transmission and distribution systems. The new wording is to be found at (b), (c) and (g) in 4.2.6.

6. Commission remark: Grid operation (4.2.7):

¹ The draft Renewable Energy Act was approved by the Bulgarian Council of Ministers by Decision No 73 of 8 February [2011] and was adopted by the National Assembly at first reading on 24 February 2011. At the next stage in the procedure it was considered by the Committee on Economic Affairs, Energy and Tourism, as the lead parliamentary committee, and is now to be put to the vote at second reading in plenary.

- *It should be explained how it is ensured that system operators report to the competent regulatory authority about measures curtailing electricity from renewable sources and about the corrective measures to be taken to minimise these curtailments [4.2.7 (d)].*

Amendments: The wording of 4.2.7 (a) and (d) has been updated. In this specific case, the following wording has been inserted:

Should there be a need for curtailment, the draft Renewable Energy Act requires the electricity transmission or distribution system operator to report annually to the State Energy and Water Regulatory Commission (DKEVR) on cases where there has been a significant reduction in the amount of RES electricity transmitted and distributed and on the measures it has taken to prevent such a reduction.

The DKEVR has jurisdiction to settle disputes between licensees and by virtue of its jurisdiction may carry out monitoring.

7. Commission remark: District heating and cooling infrastructure development (4.2.9):

- *Further information should be provided on how district heating will be supported. The plan provides only an estimate of the potential capacity, but not an assessment of how to achieve increased renewable energy shares in district heating.*

Response: Information on support measures has been added to 4.2.9.

8. Commission remark: Sustainability criteria for biofuels (4.2.10):

- *More information should be given on the institutional set-up/national institution/body responsible for monitoring/verifying compliance with the sustainability criteria. Otherwise, the timeframe envisaged for setting up the respective body should be specified.*

Response: The wording of 4.2.10 (a) has been updated and now includes information on the actions that are envisaged.

9. Commission remark: Electricity support schemes (4.3):

- *Detailed information should be provided on the projections for the expenditure under the support scheme. In other words, an explanation should be given as to whether there is an understanding of the quantities of energy from the different technologies that will be produced as a result of the support scheme incentive. It should also be explained whether this matches or differs from your projected technology production plans.*

Response: No such projections have been made to date. Calculations have been made and relevant information has been included with regard to this specific matter. The new

information is to be found in Sub-chapter 4.3, at (h) under 'Feed-in tariffs' and at (h) under 'European Regional Development Fund'. The wording of (p), (q) and (r) under 'Feed-in tariffs' has been corrected so as to remove the technical error. At (h) under 'Specific questions for feed-in fixed tariffs', the table showing the confirmed feed-in prices as at 30 March 2011 has been updated.

10. Commission remark: Heating support schemes (4.4):

- *Although Table 11 indicates a 50% increase in renewable heating by 2020, there is no support scheme foreseen to increase renewable shares in heating, apart from some European funds which are uncertain to continue. Further details of the new Renewable Energy Act should be given, in particularly whether it foresees any support for renewable heat.*

Response: The introduction to Sub-chapter 4.4. (under 'Regulation') has been expanded, reflecting the requirements to be met by investment projects under the Energy Efficiency Act. Information on the municipal energy efficiency programmes through which such support is made available has been included at (o) under 'Financial support'. Information on the tax rebates available under the Local Taxes and Charges Act has been included at (c) under 'Specific questions'. Information on the measures provided for under the draft Renewable Energy Act has been added to (d) under 'Specific questions'.

11. Commission remark: Biofuels support schemes (4.5):

- *The concrete obligations/targets per year (per fuel or technology) should be provided.*

Response: Additional information has been provided in Sub-chapter 4.5, at (c), (e) and (g) under 'Regulation', and at (a) under 'Additional questions'.

- *It should be noted that the level of ambition for 2nd generation biofuels should be consistent with the support measures envisaged. Therefore, additional information should be provided on the support measures for 2nd generation biofuels.*

Response: Additional information has been provided at (b) under 'Additional questions' in Sub-chapter 4.5.

12. Commission remark: Biomass supply (4.6.1):

- *Tables 7 and 7a: The amounts of biomass and of energy are the same, which is not in accordance with the template. These tables should be modified, stating the amounts of domestic, imported and exported biomass resource in units of m³ or, alternatively, in tonnes.*

Response: Tables 7 and 7a have been corrected.

- *The conversion factor / calculation methodology used for the conversion of the amount of available resources to primary energy should be explained.*

Response: Table 7a has been supplemented by another table showing the conversion factors. These coefficients were used by the National Statistical Institute.

- *Table 7 – clarification: Regarding domestic agricultural biomass supply to be used for biofuels production, could it be indicated whether the data provided in the columns "primary energy production" (2015 and 2020) include the final energy contained in biofuels or the primary energy from raw feedstock used to produce such biofuels?*

Response: The values indicated in Tables 7 and 7a relate to biomass consumption and data for biofuels is not included.

- *The following question should be answered: "please specify on what basis the biodegradable fraction of industrial waste was calculated".*

Response: The data in Table 7 are based on National Statistical Institute data. The National Statistical Institute presents data on the use of wood biomass from forests and woodland for energy production in cubic metres (2006: 8 089 481 m³). The following conversion factors have been used: 1 m³ = 3 806 GJ, 1GJ = 0.0239 toe, and 1 m³ = 3.5 t.

In Table 7, the data at (A) Biomass from forestry, (2) Indirect supply of wood biomass for energy generation, (B) (2) Agricultural by-products/processed residues and fishery by-products for energy generation, and (C) (2) Biodegradable fraction of industrial waste are based on 2006 data from the National Statistical Institute. These data were calculated on the basis of:

The text has been included as an explanatory note after Table 7a.

- *The imports question is not sufficiently addressed. It should be answered more specifically as to what the estimated role of imported biomass is up to 2020, while specifying the expected quantities (ktoe) and indicating possible import countries.*

Response: It is not intended to import biomass. This is reflected in 4.6.1.

13. Commission remark regarding Table 10:

- *In Table 10, the future estimates of hydro figures appear to be based on non-normalised figures. This should be clarified and corrected.*

Response: Table 10 has been corrected and the figures for electricity generation by hydropower plants have been normalised. Amendments have also been made as regards the generation of electricity by windfarms, photovoltaic power plants and biomass facilities.

- *The hydro figures should be differentiated (the figures "<1MW", "1MW–10 MW", ">10MW" and "of which pumping" should be indicated. The pumping figures in total hydro for the installed capacity should be included, but the pumping figures of total hydro for gross electricity generation should be excluded).*

Response: Data on the installed capacity of hydropower plants and the electricity they generate have been added to Table 10.

- *The NREAP shows somewhat erratic numbers for the production of solar PV. Noticeably, there appears to be a dip in full load hours for solar PV around 2015. The numbers on installed capacity and expected production for solar PV should be checked and corrected.*

Response: Corrections have been made to Table 10 as regards both the amount of electricity generated and the forecast installed capacity of PV power plants

Additional amendments made in the context of updating:

1. Table 5:

- 'Existing measures' – item 11
- 'Planned measures' – items 11 and 12

2. In Sub-chapter 4.5, (a), (b) and (g) under 'Financial support' have been corrected to reflect the current rate of excise duty.

3. The wording of Sub-chapter 5.1 has been updated.