

Case Id: d68171fc-dfea-42d7-af2d-8e54bd378e57

Preparation of a new Renewable Energy Directive for the period after 2020

Fields marked with * are mandatory.

Introduction

In its Energy Union Framework Strategy, the Commission announced a new renewable energy package for the period after 2020,[1] to include a new renewable energy directive (REDII) for the period 2020-2030 and an updated EU bioenergy sustainability policy. This consultation covers the REDII aspects. The bioenergy sustainability policy will be covered by a separate public consultation.

The results of this consultation, together with the results of the separate public consultation launched by the Commission in July 2015 concerning market design (available at <https://ec.europa.eu/energy/en/news/redesigning-europes-electricity-market-%E2%80%93-give-your-feedback>), will inform the impact assessment for REDII.

Please, submit your response to this public consultation by 10 February 2016 at the latest. You are invited to reply to the questions in the questionnaire by using the link to the survey on DG ENER's consultation webpage or via EU Survey. Always use this questionnaire even if also other documents are submitted. In order to facilitate the Commission's processing of responses, please respond in English as far as possible.

Received contributions will be published on the Internet, unless a confidentiality claim has been made on reasonable grounds. Responses from non-registered organisations will be published separately. The Commission also intends to publish a document summarizing the main outcomes of this consultation.

[1] Commission Communication: A Framework Strategy for a Resilient Energy Union with a Forward-Looking Climate Change Policy (COM/2015/080 final) of 25 February 2015

Evaluation of current policies

As part of the Commission's better regulation agenda, the current renewable energy directive[1] (RED) was included in the Commission's 2013 REFIT programme and a comprehensive evaluation study of the RED was carried out in 2014 for the purpose of assessing its effectiveness, efficiency, relevance, coherence and EU added value and to obtain stakeholders' views on the impacts and benefits of the Directive.[2] The main findings were included in the 2015 Renewable Energy Progress Report.[3] This public consultation builds on the REFIT evaluation and aims at obtaining additional information on impacts and benefits of the RED. Where appropriate, some of the questions in this questionnaire therefore also address evaluation of current policies.

[1] Directive 2009/28/EC of the European Parliament and of the Council of 23 April 2009 on the promotion of the use of energy from renewable sources and amending and subsequently repealing

Directives 2001/77/EC and 2003/30/EC

[2] REFIT Evaluation of the Renewable Energy Directive (CE DELFT, 2014) available on:

https://ec.europa.eu/energy/sites/ener/files/documents/CE_Delft_3D59_Mid_term_evaluation_of_The_RED_DEF.PDF

[3] COM (2015) 293, available at: <https://ec.europa.eu/energy/en/topics/renewable-energy/progress-reports>

Context and challenges

In its Energy Union Framework Strategy, the Commission announced a new renewable energy package for the period after 2020,[1] to include a new renewable energy directive (REDII) for the period 2020-2030 and an updated EU bioenergy sustainability policy. This consultation covers the REDII aspects. The bioenergy sustainability policy will be covered by a separate public consultation.

The results of this consultation, together with the results of the separate public consultation launched by the Commission in July 2015 concerning market design (available at <https://ec.europa.eu/energy/en/news/redesigning-europes-electricity-market-%E2%80%93-give-your-feedback>), will inform the impact assessment for REDII.

Please, submit your response to this public consultation by 10 February 2016 at the latest. You are invited to reply to the questions in the questionnaire by using the link to the survey on DG ENER's consultation webpage or via EU Survey. Always use this questionnaire even if also other documents are submitted. In order to facilitate the Commission's processing of responses, please respond in English as far as possible.

Received contributions will be published on the Internet, unless a confidentiality claim has been made on reasonable grounds. Responses from non-registered organisations will be published separately. The Commission also intends to publish a document summarizing the main outcomes of this consultation.

[1] Directive 2009/28/EC of the European Parliament and of the Council of 23 April 2009 on the promotion of the use of energy from renewable sources and amending and subsequently repealing Directives 2001/77/EC and 2003/30/EC

The core objectives of the EU Energy Union Framework Strategy[1] are to develop a long-term, secure, sustainable and competitive energy system in the EU. Europe should also be a leader in renewable energy. For this, it is important to continue to increase the share of renewable energy sources in the EU.[2] The RED ensures that all Member States will contribute to reaching 20% renewables at EU-level by 2020. In October 2014, the European Council agreed that **at least** 27% share of renewables by 2030 would reflect a cost-optimal way of building a secure, sustainable and competitive energy system (alongside an at least 40% domestic GHG emissions reduction target and the at least 27% energy efficiency target, which is to be reviewed by 2020, having in mind an EU level of 30%).

As the current legislation will not be sufficient for this purpose[3], there is a need to modify the legislative

framework to ensure a timely and cost effective achievement of the EU level binding target on renewables by 2030. A combination of different factors will need to be addressed, including:

- **General approach:** The existing policy framework does not address uncertainties with regard to national policies, governance and regional cooperation to ensure a timely and cost effective target achievement for the period after 2020.
- **Empowering consumers:** A lack of consumer empowerment and incomplete information on renewable energy solutions can hinder cost-optimal deployment of renewable energy at city and community level.
- **Decarbonising the heating and cooling sector:** In the heating and cooling sector, which represents almost half of the EU energy consumption, the current regulatory environment in combination with a lack of information does not incentivise cost-optimal deployment of renewables in heating, cooling and hot water use. The sector remains dominated by fossil fuels and therefore dependent on imports.
- **Adapting the market design and removing barriers:** The current regulatory environment does not properly reflect externalities of energy production in market prices, including environmental, social, innovation and economic externalities. Together with persistent and distortive fossil fuel subsidies,[4] this is one of the reasons leading to high capital costs that hinder cost-optimal renewable energy deployment. In addition, a lack of market integration, infrastructures (storage, interconnections) and smart solutions, including demand-response, also hinder cost-optimal deployment of renewable energy. Finally, complex administrative procedures for renewable energy deployment at national and local level have not yet been eliminated. This covers, inter alia, permitting and grid connection procedures[5].
- **Enhancing renewable energy use in the transport sector:** A policy fostering the use of sustainable alternative renewable fuels would contribute to decarbonising the transport sector and reducing risks related its fossil fuel dependency and could remove current market distortions and fragmentations observed in particular in the internal market for biofuels. Despite the progress made with regard to the development of alternative renewable fuels such as advanced biofuels and renewable fuels of non-organic origin, commercial deployment of such products in the EU is lagging behind. The main reason is the perceived uncertainty about the policy framework after 2020. Only a few Member States have adopted dedicated support measures for advanced biofuels, while most have focussed on more traditional biofuels. The potential for electric transport using renewable electricity deployment is still untapped, due to still high technology costs of deployment and lack of necessary infrastructure.

[1] Commission Communication: A Framework Strategy for a Resilient Energy Union with a Forward-Looking Climate Change Policy (COM/2015/080 final) of 25 February 2015

[2] As highlighted in the 2030 climate and energy framework (COM(2014) 15 final)

[3] As highlighted in the baseline scenario of the 2030 climate and energy framework (COM(2014) 15 final)

[4] Estimated by IMF to be 330 Billion Euro in 2015, source: <http://www.imf.org/external/pubs/ft/survey/so/2015/new070215a.htm>

[5] Without prejudice to international and Union law, including provisions to protect environment and human health.

Part 1: Information about the respondent

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

- ☐ Individual
- ☒ Organisation
- ☐ Company
- ☐ Public Authority
- ☐ Other

* Name of the company/organisation

Ibec

* Please describe briefly the activities of your company/organisation and the interests you represent

Ibec is the largest business representative organisation in Ireland. We speak for over 7000 member companies across a range of industrial, commercial and non-profit sectors. Our Energy Policy Committee includes all major stakeholders in the Irish energy sector including generators, suppliers, network operators and consumers.

* Please enter your email address

@ catherine.joyceocaollai@ibec.ie

* Are you registered with the EC transparency register?

- ☒ Yes
- ☐ No

* Which countries are you most active in?

- ☐ Austria
- ☐ Belgium
- ☐ Bulgaria
- ☐ Croatia
- ☐ Cyprus
- ☐ Czech Republic
- ☐ Denmark
- ☐ Estonia
- ☐ Finland
- ☐ France

- ☐ Germany
- ☐ Greece
- ☐ Hungary
- ☒ Ireland
- ☐ Italy
- ☐ Latvia
- ☐ Lithuania
- ☐ Luxembourg
- ☐ Malta
- ☐ Netherlands
- ☐ Poland
- ☐ Portugal
- ☐ Romania
- ☐ Slovakia
- ☐ Slovenia
- ☐ Spain
- ☐ Sweden
- ☐ United Kingdom
- ☐ Other

* Can we publish your answers on the Commission website?

- ☒ YES - under my name (I consent to all of my answers/personal data being published under my name and I declare that none of the information I have provided is subject to copyright restrictions).
- ☐ YES - anonymously (I consent to all of my answers/personal data being published anonymously and I declare that none of the information I have provided is subject to copyright restrictions).
- ☐ NO - please keep my answers confidential (my answers/personal data will not be published, but will be used internally within the Commission)

Part 2: General approach

The RED sets an EU target for renewable energy in gross final energy consumption of 20% by 2020 and 10% of the final energy consumption in transport. In order to achieve the overall 20% target, mandatory national targets for 2020 are fixed for each Member State. The RED also obliges Member States to prepare National Renewable Energy Action Plans (NREAPs) and biannual progress reports to create transparency and predictability for investors and facilitate monitoring of progress towards target achievement. The European Council has reiterated several times that the 2020 targets need to be fully met[1].

For the period after 2020, binding national targets are replaced by a binding EU-level target of at least 27% renewable energy in final energy consumption by 2030 without sectorial targets or binding targets at national level. A new approach to target achievement therefore needs to be developed, building on the Energy Union Governance and Member States' national energy and climate plans for the period up to 2030, which are expected to include national contributions towards the EU-level renewable energy

target.

Without putting into question Member States' flexibility with regard to meeting their greenhouse gas reduction targets in the most cost-effective manner in accordance with their specific national circumstances, energy mixes and capacities to produce renewable energy, the new Energy Union Governance will need to provide sufficient transparency and reliability, predictability and stability to spur renewable energy investments and allow access to low-cost capital. It will also need to enable the EU to compare and monitor progress towards the renewables target. Within the broader context of the development of the Energy Union Governance, it will need to be considered what type of governance system will be able to deliver on these renewable energy objectives.

Given that the renewable energy target for 2030 is binding on the EU as a whole, the European Commission will need to have means to ensure that this target is met in a sustainable and cost-effective way. For this purpose, EU measures could be put in place and be designed to deliver on a number of objectives of the Energy Union:

1. create a market-based environment in which renewables can attract the required investments cost-efficiently;
2. foster regional cooperation and regional projects;
3. empower consumers to deploy cost-optimal renewable energy solutions;
4. incentivise the roll-out of new and innovative technologies; and
5. ensure that any potential gap arising in reaching the at least 27% renewable energy target, in terms of either ambition or delivery, is filled.

A number of questions would arise in this respect, including under what circumstances EU measures could be used or activated, how to share potential costs in a fair and equitable way and how to ensure participation by all Member States.

The experience gained with support schemes so far has allowed developing more cost-effective and market-based support schemes. Some Member State support schemes did not respond sufficiently rapidly to falling technology cost development, which resulted in some cases in unnecessary increasing costs for consumers. The EU Energy and Environment State Aid Guidelines build on this experience and puts down conditions for the approval of State Aid. In this context an improved functioning energy market, with improved price signals, as well as a strengthened EU ETS shall improve the investment signal. At the same time it is reasonable to expect that support schemes and other incentives (financial and regulatory) will still be the main policy tools that Member States will use to implement their renewable energy objectives with respect to renewable technologies that are not yet able to be fully financed by the internal energy market.

For new and innovative technologies, it can be important to ensure that regulatory and market risks are reduced to allow that project promoters can bring down costs through technology learning and industrialisation of manufacturing and installation, in particular if the EU is to become a world leader in renewable energy. However, where possible, some degree of market integration should remain if this goes beyond mere initial technology deployment of innovative technologies, to ensure their development takes into account market needs, does not lead to overcompensation and prepares these technologies for further market integration.

Finally, in line with the broader objectives of the Energy Union, a new regional approach to renewable energy policy cooperation and incentives should be considered.

In this context, it is important to examine the optimal geographical scope and design of any support schemes in order to drive the achievement of the 2030 target in a cost-effective way, which does not lead to fragmentation and distortion of the internal energy market.

It also needs to be assessed how regional cooperation agreements similar to those developed under

RED can be improved and could play a role and to what extent support at EU-level could become relevant.

[1] The latest Renewable Energy Progress Report issued in June 2015 concluded that the majority of Member States are currently on track to meeting their 2020 renewables target. In 2013, the combined EU share of renewable energy reached 15% and the estimate for 2014 indicates a 15.3% share, which is above the trajectory for the EU as a whole. 26 Member States met their first 2011/2012 interim target and 25 Member States are expected to meet their 2013/2014 target. Some Member States have already reached their 2020 targets. However, as the trajectory towards the 2020 target becomes steeper over the coming years up to 2020, some Member States may need to intensify their efforts to keep on track (COM(2015)293 final and SWD(2015)117 final). Available here: <https://ec.europa.eu/energy/en/topics/renewable-energy/progress-reports>).

1. To what extent has the RED been successful in helping to achieve the EU energy and climate change objectives?

- ☐ Very successful
- ☐ Successful
- ☒ Not very successful
- ☐ Not successful
- ☐ No opinion

To what extent did implementation measures for the RED as well as external factors (technological development, financial crisis, security of supply concerns and related market interventions) affect the effectiveness and efficiency of achieving the objectives?

Please identify and ideally also quantify the direct and indirect costs and benefits such as macroeconomic effects, competitiveness effects, innovation, cost and cost reductions, environmental and health effects of the Renewable Energy Directive.

3,600 character(s) maximum

There are two ways to look at the extent of the success of RED: if one was to assess the progress of RED in isolation it would be successful. Highlights from the Sustainable Energy Authority of Ireland's report on Energy in Ireland in 2013 show that Ireland is just over half way to meeting RES targets. However, looked at in the context of the overall EU energy and climate change objectives, it may not be deemed quite as successful. This stems from policy incoherence caused by having too many nationally binding targets. However, for the period out to 2030, the European Council Conclusions of October 2014 prioritise GHG emissions reduction.

In Ireland, most progress has been in the ETS sector and there has been a lack of focus on heat and transport. If there was more renewable development in non-ETS it would complement the ETS. However it has the effect of competing with the ETS and reducing the cost of allowances. As Member States will have nationally binding targets for GHG emissions reduction out to 2030 the focus should be on the non-ETS. In Ireland's case and given our emissions profile this must be heat and transport. Member States therefore require flexibility in meeting non-ETS targets and flexibility in prioritising how

to get there.

In terms of cost efficiency, for example, CEER reported that Ireland has a relatively low cost of RES support in comparison to other EU countries.
http://www.ceer.eu/portal/page/portal/EER_HOME/EER_PUBLICATIONS/CEER_PAPERS/Electricity/Tab2/C12-SDE-33-03_RES%20SR_25%20June%202013%20revised%20publication_0.pdf

2. How should stability, transparency and predictability for investors be ensured with a view to achieving the at least 27% renewable energy target at EU level? Please indicate the importance of the following elements:

	Very important	Important	Not very important	Not important	No opinion
Forward looking strategic planning of RES development is required by EU legislation	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Best practice is derived from the implementation of the existing Renewable Energy Directive	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Regional consultations on renewable energy policy and measures are required	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Member States consult on and adopt renewable energy strategies that serve as the agreed reference for national renewable energy policies and projects	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The Commission provides guidance on national renewable energy strategies	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

Any other view or ideas? Please specify. What are the lessons from the RED (mandatory national targets, national plans, progress reports etc.)?

3,600 character(s) maximum

There are important lessons that could be learned, for example the process under which national targets were set. Unlike burden sharing in the non-ETS, targets were set according to national capabilities and circumstances. Simply put, no one was given an impossible target.

Further information would be required on the type of guidance the Commission would provide on national renewable energy strategies and how it adheres to the principle of subsidiarity.

3. Please rate the importance of the following elements being included in Member States' national energy and climate plans with respect to renewable energy in ensuring that the plans contribute to reaching the objectives of at least 27% in 2030.

	Very important	Important	Not very important	Not important	No opinion
Long term priorities and visions for decarbonisation and renewable energy up to 2050	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
In relation to national/regional natural resources, specific technology relevant trajectories for renewable energy up to 2030	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Overview of policies and measures in place and planned new ones	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Overview of renewable energy trajectories and policies to 2050 to ensure that 2030 policies lie on the path to 2050 objectives	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Qualitative analysis	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Trajectories for electricity demand including both installed capacity (GW) and produced energy (TWh)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Measures to be taken for increasing the flexibility of the energy system with regard to renewable energy production	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Plans for achieving electricity market coupling and integration, regional measures for balancing and reserves and how system adequacy is calculated in the context of renewable energy	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please explain.

3,600 character(s) maximum

From the outset it is important to point out that many of these elements relate to RES-E. Electricity only accounts for 20% of final energy consumption in Ireland. There needs to be more emphasis on RES-H and RES-T, notwithstanding the potential for electrification of these sectors.

It is a worthwhile exercise to develop energy trajectories and to conduct a regular overview of measures in place in order to assist in devising a cost-effective strategy for ensuring security of supply. However, a cautious a

approach is required in developing technology relevant trajectories given the costly lessons learned in other Member States as a result of "picking winners".

While an overview of renewable energy trajectories and policies will assist in developing the policy pathway to 2050, RES is only one element to assist in meeting GHG reduction targets. Suffice to say the governance process will provide a clearer picture of how all the targets will assist in decarbonising the EU. Member States must have the flexibility to meet their targets in the most cost-effective manner.

It is important to not only have trajectories for demand, but also to have develop measures for increasing flexibility given the need to devise a market with more intermittent sources of supply on the system. The need to devise an electricity market structure that adequately supports energy, capacity, flexibility and system services is one of the most pressing issues in terms of electricity market design.

In our response to public consultation on the market design, we noted concerns regarding regional measures for balancing and reserves and the calculation of system adequacy for a small, relatively isolated system that is non-synchronously connected to another island system (GB) which itself has limited interconnection to the continent.

4. What should be the geographical scope of support schemes, if and when needed, in order to drive the achievement of the 2030 target in a cost-effective way?

- ☒ Harmonised EU-wide level support schemes
- ☐ Regional level support schemes (group of Member States with joint support scheme)
- ☐ National support schemes fully or partially open to renewable energy producers in other Member States
- ☐ Gradual alignment of national support schemes through common EU rules
- ☐ National level support schemes that are only open to national renewable energy producers

Please explain.

3,600 character(s) maximum

As noted in our response to the public consultation on the market design, the Energy and Environment Aid Guidelines demonstrate an important basis for underpinning a common set of principles to inform a coordinated approach in devising renewable support schemes. Our members recognise that a reformed EU ETS is the key instrument for decarbonising the electricity and large industry sectors. While variations remain in the market designs and fuel mixes of Member States, and in order to work towards a single market price to efficiently incentivise all types of plant/generation, harmonised EU-wide level supports schemes seem the most appropriate option in the next transitional phase.

5. If EU-level harmonised /regional support schemes or other types of financial support to renewable

energy projects would be introduced:

- What hinders the introduction at the EU wide and/or regional scale?
- How could such mechanism be activated and implemented? What would be their scope (what type of projects/technologies/support mechanisms could be covered?)
- Who would finance them?
- How could the costs of such measures be shared in a fair and equitable way?

3,600 character(s) maximum

While we support the rationale for introducing EU wide support schemes, we would welcome further clarification on how they could function in the absence of nationally binding targets.

6. The current Renewable Energy Directive gives Member States the possibility to enter into various cooperation mechanisms (statistical transfers, joint projects and/or joint support schemes). Please expand on the possible new legislative and non-legislative measures that could be introduced to foster the development of cooperation mechanisms in the period beyond 2020.

3,600 character(s) maximum

As above - While we support the rationale for introducing EU wide support schemes, we would welcome further clarification on how they could function in the absence of nationally binding targets.

7. The use of cooperation mechanisms has been limited to date. Which of the below factors do you consider important in explaining the limited recourse by Member States to cooperation mechanisms so far?

	Very important	Important	Not very important	Not important	No opinion
Unclear legal provisions	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Administrative complexities	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Lack of cost-effectiveness / uncertain benefit for individual Member States	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Government driven process, not market driven	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Member States reluctant to see their taxpayers/ consumers' money used for investments outside their country	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Other? Please explain.

3,600 character(s) maximum

8. How could renewable electricity producers be fully or partially eligible for support in another Member State? Which elements would you include in a possible concrete framework for cross-border participation in support schemes? Any other consideration? Please explain.

3,600 character(s) maximum

The goal should be the most cost-effective deployment of renewable energy technologies across Europe that adheres to the principle objectives of the internal energy market. On a separate but related issue of cross-border trading over an interconnector, generators on both sides of the interconnector must be subject to equal treatment to ensure that it provides appropriate incentives, resulting in value for money and security of supply for consumers.

9. Please assess what kind of complementary EU measures would be most important to ensure that the EU and its Member States collectively achieve the binding at least 27% EU renewable energy target by 2030:

	Very important	Important	Not very important	Not important	No opinion
EU-level incentives such as EU-level or regional auctioning of renewable energy capacities	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
EU-level requirements on market players to include a certain share of renewables in production, supply or consumption	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
EU-level financial support (e.g. a guarantee fund in support of renewable projects)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
EU-level support to research, innovation and industrialisation of novel renewable energy technologies	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Enhanced EU level regulatory measures	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

Any other ideas or comments, please explain.

3,600 character(s) maximum

In terms of EU-level financial support (e.g. a guarantee fund in support of renewable projects) we would require further information as to where this money would come from and how it would be generated. Would it be calculated along the lines of the Effort Sharing formula?

EU level support to support research, innovation and industrialisation of novel technologies would assist in the EU's ambition of become the "number one in renewables". This support could be derived from the auctioning of EUAs.

10. The Energy Union Framework Strategy sets the ambition of making the European Union the global "number one in renewables". What legislative and non-legislative measures could be introduced to make/strengthen the EU as the number one in renewables? Has the RED been effective and efficient in improving renewable energy industrial development and EU competitiveness in this sector?

3,600 character(s) maximum

If the goal is to make the EU the "number one in renewables", the emphasis should be on supporting research and development.

Part 3: Empowering consumers

The European Commission's Energy Union Strategy put the consumer at the centre stage. Consumers have a key role to play in energy markets and in driving the transition to a more sustainable energy system in the EU. On 15 July 2015, the Commission issued a Communication on delivering a new deal for energy consumers (COM/2015/339)[1] as well as a guidance document on best practices on renewable energy self-consumption (SWD/2015/ 141).[2] In this context, REDII provides opportunities to develop more targeted measures for empowering consumers, including communities and cooperatives[3].

As active participants in the energy market, consumers should be able to self-consume and store renewable energy in the EU.

Provisions on simplified and streamlined procedures on permitting and grid connection in case of projects for self-consumption of renewable energy could be further enhanced.

The wide-spread development of self-consumption may also require gradual adjustment of retail tariffs to promote consumers' flexibility, while supporting energy efficiency and the renewable energy objectives and at the same time minimise total system costs. The establishment of common principles at EU-level for network tariff design will thus need to be considered.

Renewable energy deployments need also to observe certain rights granted to the public, by international and EU law, such as, for instance, the right to access to information, public participation and consultation, as well as access to justice on environmental matters[4]. Thus, contributing to accountability, transparency and public awareness.

The REDII also offers opportunities to foster local ownership of renewable energy (e.g. community and citizen participation in renewable energy cooperatives). It seems particularly important to support local authorities in preparing strategies for the promotion of renewable energy, enable cooperation between relevant actors at the local or municipal level and facilitate access to finance.

Under the RED, a Guarantees of Origin (GO) system provides an EU wide mechanism to inform electricity consumers as to the renewable nature of the electricity that they use, enabling green tariffs to develop but also being criticised for not sufficiently linking these tariffs to real incentives for additional new green energy deployment. It should be assessed to what extent the current rules for electricity

disclosure (incl. GO) can be improved to reflect best practice in Member States' implementation and help consumers choose a more sustainable energy consumption pattern.

[1] https://ec.europa.eu/energy/sites/ener/files/documents/1_EN_ACT_part1_v8.pdf

[2] http://ec.europa.eu/energy/sites/ener/files/documents/1_EN_autre_document_travail_service_part1_v6.pdf

[3] Without prejudice to the EU and international law on the right to access to information, public participation and consultation, as well as access to justice on environmental matters.

[4] UNECE Convention on access to information, public participation in decision-making and access to justice in environmental matters (Aarhus Convention), Directive 2011/92/EU, as amended by Directive 2014/52/EU (EIA Directive), Directive 2001/42/EC (SEA Directive).

11. How would you rate the importance of the following barriers for consumers to produce and self-consume their own renewable energy?

	Very important barrier	Important barrier	Not very important barrier	Not important barrier	No opinion
Self-consumption or storage of renewable electricity produced onsite is forbidden	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Surplus electricity that is not self-consumed onsite cannot be sold to the grid	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Surplus electricity that is not self-consumed onsite is not valued fairly	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Appliances or enabler for thermal and electrical storage onsite are too expensive	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Complex and/or lengthy administrative procedures, particularly penalising small self-consumption systems	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Lack of smart grids and smart metering systems at the consumer's premises	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
The design of local network tariffs	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
The design of electricity tariffs	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

Other? Please explain.

3,600 character(s) maximum

12. In general, do you think that renewable energy potential at local level is:

- ☐ Highly under-exploited
- ☐ Under-exploited
- ☐ Efficiently / fully exploited
- ☐ Over-exploited (i.e. beyond cost-effectiveness)
- ☒ No opinion

Other? Please explain. Has the RED been effective and efficient in helping exploiting the renewable energy potential at local level?

3,600 character(s) maximum

The Local Authority Renewable Energy Scheme is run by the Sustainable Energy Authority of Ireland. It aims to and to assist local authorities in developing robust, co-ordinated and sustainable strategies in accordance with national and European obligations. Further information detailing its strategy and methodology can be found at:

























http://www.seai.ie/Publications/Renewables_Publications_/Wind_Power/Methodology-for-Local-Authority-Renewable-Energy-Strategies.pdf

The Irish Government announced the introduction of a Renewable Heat Incentive from 2016 onwards (subject to State Aid clearance). It remains to be seen whether the tariffs (yet to be decided) will provide adequate levels of support. However it is important to point out that the analysis suggests that the most cost-effective way to close the gap is in the services sector/non-ETS industry (rather than the domestic or industrial).

http://www.seai.ie/Publications/Statistics_Publications/Energy_Modelling_Group_Publications/Achieving-Ireland-s-2020-Renewable-Heat-Target.pdf

13. How would you rate the importance of the following barriers that may be specifically hampering the further deployment of renewable energy projects at the local level (municipalities and energy cooperatives):































	Very important barrier	Important barrier	Not very important barrier	Not important barrier	Not important barrier	No opinion
Lack of support from Member State authorities	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Lack of administrative capacity and/or expertise/ knowledge/information at the local level	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Lack of energy strategy and planning at local level	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

Lack of eligible land for projects and private property conflicts						
Difficulties in clustering projects to reach a critical mass at local level						
Lack of targeted financial resources (including support schemes)						
Negative public perception						

Other? Please explain.

3,600 character(s) maximum

14. Please rate the appropriateness of stronger EU rules in the following areas to remove barriers that may be specifically hampering the further deployment of renewable energy projects at the local level:

	Very appropriate	Appropriate	Not very appropriate	Not appropriate	No opinion
Promoting the integration of renewable energy in local infrastructure and public services					
Supporting local authorities in preparing strategies and plans for the promotion of renewable energy					
Facilitating cooperation between relevant actors at the local or municipal level					
Facilitating access to targeted financing					
EU-wide right to generate, self-consume and store renewable electricity					
Measures to ensure that surplus self-generated electricity is fairly valued					

Harmonized principles for network tariffs that promote consumers' flexibility and minimise system costs	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
---	-----------------------	-----------------------	-----------------------	----------------------------------	-----------------------

Other? Please explain.

3,600 character(s) maximum

The effort required to implement some of the proposed measures listed above would be best directed in other areas; for example, facilitating access to targeted financing. There is already sufficient expertise and programmes in place to support local authorities in promoting renewable energy.

There are existing measures in place for valuing surplus self-generated electricity. It is questionable as to how stronger EU rules would be of benefit to the consumer.

We would welcome further information on how harmonized principles for network tariffs could minimise system costs in comparison to current common methodologies (i.e. cost-reflective, tariff calculations based on forecast demand and allowable revenue).

15. Should the current system for providing consumers with information on the sources of electricity that they consume be further developed and improved?

If not, why? If yes, how?

Should the current Guarantees of Origin (GO) system be made the mandatory form of information disclosure to consumers?

Should other information, such as e.g. CO2 emissions be included?

Should it be extended to the whole energy system and include also non-renewable sources? Other ideas?

To what extent has the current GO system been successful in providing consumers with information on the sources of electricity that they consume?

3,600 character(s) maximum

Part 4: Decarbonising the heating and cooling sector

Renewable heating and cooling can make a real difference for the decarbonisation of the EU economy and enhance EU security of supply. While cost-effective renewable energy equipment is available, 80-90% of the EU heat and hot water production is still using largely imported gas and oil. The RED includes limited provisions for the promotion of renewable heating and cooling. In REDII, more targeted measures could be considered to further increase renewables deployment in the heating and cooling sector, building on and interacting with energy efficiency and security of energy supply legislation. A comprehensive approach could be developed targeting buildings, individual energy use for heating and cooling, and the share of renewable energy in district heating and CHP units.




































Efficient ways need to be found to stimulate switching from fossil fuels to renewable heating and cooling and hot water generation in the large number of EU homes with individual heating equipment. The existing nearly-zero energy building (NZEB) standards (mandatory from 2021 for all new building) include obligations for minimum use of renewable energy. It appears however that this is insufficient to further encourage the use of renewables at the building level. It could therefore be considered whether the NZEB rules should be made more ambitious to also include an obligation to use renewable energy heating (including water heating) and cooling in the existing building stock, effective if and when the building is subject to major renovation or the heating system is replaced. Measures will also need to encourage a shift in consumer behaviour, perhaps through better information about renewable energy alternatives from heating equipment suppliers and installers, and encourage investment in energy storage and demand-shifting capacity.

Although district heating systems only cover 13% of the European heat market, in Nordic, Central and Eastern European Member States 50-80% of the heating is produced by district heating. Most of this heating is produced from imported natural gas, followed by coal, and renewables. In these Member States, measures to increase the share of renewable energy in heating and cooling supply could bring significant gains. For example, it could be assessed whether, based on comprehensive assessments of national heating and cooling potentials, energy suppliers could potentially be required to progressively increase the share of renewable energy in the overall energy that is placed on the market for heating and cooling purposes, taken into account the market incentives already available for this sector. It could also be assessed whether all new and significantly upgraded heating and cooling infrastructure should enable at least a certain share of all heating, cooling and hot water needs to be sourced from renewable energy sources produced on site or nearby (through local networks).

The potential for renewable energy in decarbonising the heating and cooling sector will also be addressed within the forthcoming Heating and Cooling Strategy and Security of Energy Supply proposals, while sustainability aspects will be addressed through the post-2020 EU bioenergy sustainability policy.

16. Please rate the importance of the following barriers in hampering the deployment of renewable heating and cooling in the EU:

	Very important barrier	Important barrier	Not very important barrier	Not important barrier	No opinion
Real or perceived incoherence in existing EU policies (such as RED, EED and EPBD)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Lack of administrative capacity and/or expertise/ knowledge/information at the national and local level	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Lack of energy strategy and planning at the national and local level	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Lack of physical space to develop renewable heating and cooling solutions	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Lack of requirements in building codes and other national or local	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

legislation and regulation to increase the share of energy from renewable sources in the building sector					
Heating and cooling equipment installers lack sufficient knowledge or information to offer renewable energy alternatives when asked to replace fossil fuel heating and cooling equipment					
Lack of targeted financial resources and financing instruments					
Lack of definition and recognition of renewable cooling					
Lack of electricity market design supporting demand response, decentralised energy and self-consumption and thermal storage in buildings and district systems					
Lack of mapping tools to identify the resources potential at regional scale with local renewable energy					
Lack of tools and information to compare the lifecycle costs of the various alternative heating and cooling alternatives					
Negative public perception					

Other? Please specify and explain.




3,600 character(s) maximum
















Some of our members cited skills gaps for installation, operation and maintenance of certain renewable heat technologies act as a disincentive.

As noted in response to Q1, Ireland is just over half way to meeting our RES targets. Ireland is likely to fall short of the renewable heat (RES-H) target to deliver 12% of final heat demand from renewable energy sources by 2020. The Irish Government announced the introduction of a Renewable Heat Incentive from 2016 onwards. The Irish Government has announced that this will be funded through Exchequer revenues.

http://www.seai.ie/Publications/Statistics_Publications/Energy_Modelling_Group_Publications/Achieving-Ireland-s-2020-Renewable-Heat-Target.pdf

17. Please rate the most effective means of addressing these barriers and advancing the decarbonisation of EU heating and cooling supply:

	Very effective	Effective	Not very effective	Not effective	No opinion
Renewable heating and cooling obligation					
Requirement for energy suppliers and/or distributors to inform consumers of the costs of heating and cooling and to offer renewable heating and cooling solutions					
Requirement that all urban and municipal infrastructure upgrades (energy infrastructures, and other relevant infrastructure, such as sewage water, water and waste chains) make it possible and promote the distribution and use of renewable energy for heating and cooling and hot water generation					
Measures supporting best practices in urban planning, heat planning, energy master planning, and project development					
Criteria and benchmarks for promoting district heating and cooling taking into consideration the local and regional conditions					
Nearly zero-energy building (NZEB) standards to include a mandatory minimum use of renewable energy					
Including systematically renewable energy production in buildings' energy performance certificates					
The promotion of green public procurement requirements for renewable heating & cooling in public buildings					
Heating and cooling equipment installers should present renewable energy alternatives when asked to replace fossil fuel heating and cooling equipment					

Develop best practices for enterprises, including SMEs, to integrate renewable heating and cooling into their supply chains and operations					
Requirement to consider renewable energy alternatives in subnational, national, regional or EU security of supply risk preparedness plans and emergency procedures					
Targeted financial measures					

Other? Please specify and explain. How could such measures be designed? How could they build on existing EU rules?

3,600 character(s) maximum

It is important to point out that a national support scheme for RES-H (directed at the non-ETS sector) is due to commence in 2016. As it is targeted at the non-ETS sector, it does not require harmonisation at an EU level.

Our members would welcome further analysis on the impacts of interactions between the proposed renewable heating and cooling obligation and the Energy Efficiency Obligation Scheme as required by Article 7 of the Energy Efficiency Directive.

In addition to the business sector, the opportunity for renewable heat in the domestic sector should not be ignored. Nearly zero-energy building (NZEB) standards are defined by national legislation in line with EU principles.

As outlined in the National Renewable Energy Action Plan, Part L of the Building Regulations provide for the mandatory use of Renewable Energy sources in new dwellings (a minimum of 10 kWh/m² /annum contributing to energy use for domestic hot water heating, space heating or cooling). They were further revised in 2011 to achieve an aggregate 60% improvement in energy efficiency and an aggregate 60% reduction in associated carbon emissions relative to 2005 requirements. The final target for NZEB will be a 60% aggregate improvement and will be defined in new Regulations in 2018 which will apply to public sector buildings with immediate effect and to all other buildings other than dwellings by 2020.

<http://www.dcenr.gov.ie/energy/SiteCollectionDocuments/Energy-Efficiency/NEEAP%203.pdf>

Part 5: Adapting the market design and removing barriers

A separate public consultation, which was open during the period 15 July – 8 October 2015, gathered extensive input on a wide range of issues aimed inter alia at making the market design fit for

renewables. This section includes complementary questions. Both public consultations will inform policy makers during the development of REDII.

Changes in the market provisions are of utmost importance in order to build a market which is fully fit for renewables. For example, the establishment of liquid and better integrated short-term intraday and balancing markets will help to increase flexibility and help renewable energy producers to integrate in the market and compete on an equal footing with conventional energy producers, while the strengthening of the EU ETS can contribute to reinforce the long term investment environment.


























The RED includes obligations to ensure transparent and foreseeable grid development for renewable energy as well as predictable, transparent and non-discriminatory grid connection and access procedures and costs. REDII as well as the Commission's market design initiative offers opportunities to update and improve these rules to take account of market developments and experience gained. Consideration also needs to be given to dispatch provisions in close connection with the development of the market design initiative.

The on-going evaluation of the Renewable Energy Directive (REFIT) shows that overall progress in removing non-financial barriers to renewable energy deployment in EU Member States is still limited and slow across the EU despite the specific provisions on administrative procedures, regulations and codes for renewable energy projects, requirements to share information and ensure quality of renewable energy training enshrined in the RED. Other studies point towards the same conclusion. It is reasonable to assume that there is therefore a need for more harmonized EU rules in a number of areas, including permitting procedures, spatial and environmental planning and vocational and professional training.

Note should be taken of already existing legal provisions and practice for streamlining and improving permit granting processes, in particular the provisions laid down in Regulation 347/2013 (TEN-E Regulation) and Directive 2011/92/EU (EIA Directive). Given the existing internal energy market, it is important to ensure that streamlining and improving the permitting granting processes is performed in accordance with existing internal EU legislation, as well as with due regard to the principle of subsidiarity and the national competences and procedures enabling renewable energy deployment. More effective and efficient administrative procedures should not compromise the high standards for protection of the environment and public participation. The establishment of a competent authority or authorities integrating or coordinating all permit granting processes ('one-stop-shop') should reduce complexity, increase efficiency and transparency and help enhance coordination among Member States.

18. In your view, which specific evolutions of the market rules would facilitate the integration of renewables into the market and allow for the creation of a level playing field across generation technologies? Please indicate the importance of the following elements to facilitate renewable integration:

	Very important	Important	Not very important	Not important	No opinion
A fully harmonised gate closure time for intraday throughout the EU	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Shorter trading intervals (e.g. 15 min)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Lower thresholds for bid sizes	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Risk hedging products to hedge renewable energy volatility	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

Cross border capacity allocation for short-term markets (i.e., some capacity being reserved for intraday and balancing)					
Introduction of longer-term transmission rights (> 3 years)					
Regulatory measures to enable thermal, electrical and chemical storage					
Introduction of time-of-use retail prices					
Enshrine the right of consumers to participate in the market through demand response					

Any other view or ideas? Please specify.

3,600 character(s) maximum

Although geographically peripheral, Ireland is a central reflector of the significant practical challenges surrounding the implementation of EU climate and energy policy and can offer important lessons in facilitating renewable integration that should be heeded in a power market design. As we have noted in previous submissions, certain characteristics of the wholesale electricity market on the island of Ireland are almost unique within the EU. While there may be a benefit in introducing harmonised or common market rules in certain areas, for example such as a fully harmonised gate closures for intraday, some of the suggested proposals listed above (i.e. lower thresholds for bid sizes) could have the effect of preventing access to the market for new entrants.

The introduction of ToU retail prices will provide sophisticated consumers with the opportunity to avoid consumption of electricity during peak price periods and reduce costs. Demand response will play a key role in the power system in the upcoming years. We support the design of market rules to allow demand response, triggered by market incentives, to participate in all markets. The ability to manage and adjust electricity consumption in response to real-time information and changing price signals coupled with suppliers to offer cost-reflective, flexible price signals that reward consumers' flexible consumption. However, in order to ensure security of supply, it must be balanced with current and future physical capacity requirements to meet peak demand.

19. Currently, some exceptions from the standard balancing responsibilities of generators exist for energy from renewable sources. In view of increasingly mature renewable generation technologies and a growing role of short-term markets, is time ready to in principle make all generation technologies subject to full balancing responsibilities?




































- ☒ Yes, in principle everyone should have full balancing responsibilities
- ☐ No, we still need exemptions

Please specify: If exemptions remain necessary, please specify if and in which case and why exemptions would still remain necessary (e.g. small renewable producers, non-mature technologies)?

3,600 character(s) maximum

The new all island market design, I-SEM, will introduce balancing responsibilities for all participants.

20. Please assess the importance of stronger EU rules in the following areas to remove grid regulation and infrastructure barriers for renewable electricity deployment:

	Very important	Important	Not very important	Not important	No opinion
Treatment of curtailment, including compensation for curtailment					
Transparent and foreseeable grid development, taking into account renewable development and integrating both TSO and DSO level and smart technologies					
Predictable transparent and non-discriminatory connection procedure					
Obligation/priority of connection for renewables					
Cost of grid access, including cost structure					
Legal position of renewable energy developers to challenge grid access decisions by TSOs					
Transparency on local grid congestion and/or market-based incentives to invest in uncongested areas					

Comments and other ideas, including whether there are any consideration concerning gas from renewable energy sources, for instance expansion of gas infrastructure, publication of technical rules, please explain.

3,600 character(s) maximum

The introduction of guidelines to remove infrastructure barriers, on issues such as transparency in grid development, grid connection based on non-discriminatory connection procedures and transparency on local grid congestion could have the effect of improving the integration of renewables. However,

all types of resources should be subject to the same network connection rules and operational market responsibilities. It is important that these guidelines are not overly prescriptive or imposed to the detriment of the overall market structure and design.

21. Which obstacles, if any, would you see for the dispatching of energy from all generation sources including renewables on the basis of merit order principles? Should there be any exemptions in some specific cases?

- ☐ Yes, exemptions are necessary
- ☐ No, merit order is sufficient

Please specify: If yes, in which case and why? What are the lessons from the implementation of RED?

3,600 character(s) maximum

22. Please assess the importance of stronger EU rules in the following areas to remove administrative barriers to renewable energy deployment:

	Very important	Important	Not very important	Not important	No opinion
Creation of a one stop shop at national level to allow for more streamlined permitting procedures	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Online application for permits	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
A defined maximum time-limit for permitting procedures, and effective consequences if deadline is missed	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Harmonisation of national permitting procedures	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Special rules for facilitating small-scale project permitting, including simple notification	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Pre-identified geographical areas for renewable energy projects or other measures to integrate renewable energy in spatial and environmental planning	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Any other views or ideas? To what extent has the RED been successful in reducing unnecessary administrative barriers for renewable energy projects in the Member States? Please specify.

3,600 character(s) maximum

The Irish Department of Communications, Energy and Natural Resources launch

ed a consultation on a Draft Strategic Environmental Assessment Scoping Report for a Renewable Electricity Policy and Development for consultation for use in conjunction with the Planning Guidelines on Wind Energy Development and other more general planning guidance. While it is still subject to consultation, it will seek to broadly identify suitable areas for the development of large scale renewable electricity project development in a sustainable manner. Given varying national circumstances across the EU, the introduction of stronger EU rules for pre-identified geographical areas may not assist in meeting the objectives of RED.

<http://www.dcenr.gov.ie/energy/Lists/Consultations%20Documents/Renewable%20Energy/Draft%20Strategic%20Environmental%20Assessment%20Scoping%20Report.pdf>

23. Please identify precise challenges with regard to grid regulation and infrastructure barriers in EU Member States that you are aware of.

3,600 character(s) maximum

24. How would you rate the administrative burden and cost of compliance with the RED for national, regional and local authorities?

	Very important	Important	Not very important	Not important	No opinion
Administrative burden	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Cost of compliance	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
















Please explain. How could the administrative burden and cost of compliance be reduced in the period after 2020?

3,600 character(s) maximum

As answered in response to Q1, CEER reported a relative low cost of RES support in comparison to other EU countries. However, the cost of compliance is expected to increase post-2020 as more expensive technologies are deployed. With that in mind, it is important that the market design facilitates the integration of renewable technologies rather than overly prescriptive, harmonised rules for meeting the overall 27% EU target for 2030. An overly prescriptive framework will make it more difficult and costly for consumers to meet the cost of compliance.

25. Please rate the importance of stronger EU rules in the following areas to remove barriers relating to renewable energy training and certification:

	Very important	Important	Not very important	Not important	No opinion
Incentives for installers to participate in certification/qualification schemes	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Increased control and quality assurance from public authorities					
Understanding of the benefits and potential of renewable technologies by installers					
Mutual recognition of certificates between different Member States					

Comments, other ideas, please explain. To what extent has the RED been successful in reducing unnecessary training and certification barriers in the Member States?

3,600 character(s) maximum

26. How can public acceptance towards renewable energy projects and related grid development be improved?

3,600 character(s) maximum

The recently published Energy White Paper, Ireland's Transition to a Low Carbon Energy Future, makes a number of suggestions to improve community engagement and public acceptance. This paper was published in December and many of its recommendations have yet to be implemented or the cost-benefits assessed. Some of these include developing a mechanism to allow communities to receive payment for electricity, providing funding for community-led projects, developing a framework for agreeing how communities share in benefits of new energy infrastructure and establishing a register to community benefits.

<http://www.dcenr.gov.ie/energy/SiteCollectionDocuments/Energy-Initiatives/Energy%20White%20Paper%20-%20Dec%202015.pdf>

Part 6: Increase the renewable energy use in the transport sector

Decarbonisation and the replacement of fossil fuels is particularly challenging in the transport sector. 94% percent of EU transport relies on oil products, of which 90% is imported and represents a growing share of carbon emissions. Against this background, the October 2014 European Council invited the European Commission to further examine instruments and measures for the transport sector, including the promotion of energy from renewable energy sources.

According to European Commission estimates, a significant contribution from renewable transport fuels will be required to meet the overall EU 2030 decarbonisation targets. To achieve this, measures will need to be put in place to require an increased market up-take and deployment of sustainable low-carbon biofuels and alternative renewable fuels as well as renewable electricity in battery electric vehicles and hydrogen in fuel cell vehicles.

For example, further use could be made of incorporation obligations, dedicated financing (in particular in the heavy duty transport and aviation industry) and measures to increase access to smart energy services and infrastructure and promote the development of advanced renewable fuels which are not

based on food crops. Special care needs to be taken to remove current market distortions and fragmentations of the EU internal market.

28. To what extent has the RED been successful in addressing the following EU transport policy objectives?

	Very successful	Successful	Not very successful	Not successful	No opinion
Contribute towards the EU's decarbonisation objectives	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Reduce dependency on oil imports	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Increase diversification of transport fuels	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Increase energy recovery from wastes	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Reduce air pollution, particularly in urban areas	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Strengthen the EU industry and economy competitiveness	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Stimulate development and growth of innovative technologies	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Reduce production costs of renewable fuels by lowering the level of investment risk	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Facilitate fuel cost reduction by integration of the EU market for renewable fuels	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

Any other view or ideas? Please specify

3,600 character(s) maximum

29. Please name the most important barriers hampering the development of sustainable renewable fuels and renewable electricity use in transport?































Please explain, and quantify your replies to the extent possible.

3,600 character(s) maximum

Finding marginal land for energy crops to produce liquid biofuels as well as the economics of biogas.

30. Please rate the most effective means of promoting the consumption of sustainable renewable

fuels in the EU transport sector and increasing the uptake of electric vehicles:

	Very effective	Effective	Not very effective	Not effective	No opinion
Increased use of certain market players' obligations at Member State level					
More harmonised promotion measures at Member States level					
The introduction of certain market players' obligations at the EU level					
Targeted financial support for deployment of innovative low-carbon technologies (in particular to the heavy duty transport and aviation industry)					
Increased access to energy system services (such as balancing and voltage and frequency support when using electric vehicles)					
Increased access to alternative fuel infrastructure (such as electric vehicle charging points)					

Any other view or ideas? Please specify.

3,600 character(s) maximum

In Ireland, sustainable liquid biofuels will be the largest contributor to RES-T in the period to 2020, with a small contribution coming from electrification. Other technologies are likely to become more cost effective and widely adopted. These include electric vehicles (EVs), renewable fuels such as biogas and advanced liquid biofuels, as well as less carbon-intensive fossil fuels, including compressed natural gas (CNG) and liquefied petroleum gas (LPG). EVs are incentivised by a grant scheme support (aid of up to €5,000 towards the purchase) in addition to Vehicle Registration Tax (VRT) relief. The Irish Government has attempted to incentivise the uptake of natural gas vehicles. The excise rate for natural gas and biogas as propellant will be set at the current EU minimum rate (€2.60 per GJ) and that this rate will be held for the next 8 years.

With regards to alternative fuels infrastructure, the development gas transportation will be hindered without the provision of refuelling points. The Alternative Fuels Infrastructure necessitates adequate refuelling points for alternative infrastructure. However, some form of support could be required in order to comply with the directive.

Contact

Sara.DEMEERSMAN-JAGANJACOVA@ec.europa.eu
