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-fee 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_R

[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-fee will inform the impact assessment for REDII.

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[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

Irish Wind Energy Association

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

IWEA is Ireland's leading renewable energy representative body representing more than 200 members involved in wind and renewable energy development in Ireland and Northern Ireland (through the Northern Ireland Renewables Industry Group (NIRIG), set up in collaboration with Renewable UK). IWEA represents members with projects across the spectrum, in operation, under construction and awaiting connection. In Ireland IWEA members are involved in the majority of connected projects but also involved in more than 85% of the MW of currently grid contracted projects.

* Please enter your email address

mary@iwea.com

* Are you registered with the EC transparency register?

- [x] Yes
- [ ] No

* Which countries are you most active in?

- [ ] Austria
- [ ] Belgium

- [ ] Bulgaria
- [ ] Croatia
- [ ] Cyprus
- [ ] Czech Republic
- [ ] Denmark
- [ ] Estonia
- [ ] Finland
- [ ] France
- [ ] Germany
- [ ] Greece
- [ ] Hungary
- [x] 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.

3600 character(s) maximum

Overall, the RED was successful in launching the EU's efforts towards 20% of renewable energy in gross final energy consumption by 2020. In 2014, the renewables share reached 15,3%, exceeding the projected EU trajectory. The clearly defined European regulatory framework for renewables by 2020, agreed in co-decision and enshrined in legislation, setting out binding national targets for renewables, was decisive in incentivising Member States to adopt enabling renewable energy support policies and in attracting private investment in renewable energy assets.

Driven by ambitious, stable and supportive policy frameworks, wind power is now a mainstream industry providing a cost-effective solution to climate and energy challenges. This growth has placed the European wind industry not only as a global leader in its own sector, but also amongst all renewable energy technologies.
The requirements under the RED to minimise curtailment, and to report on curtailment where it does occur, have ensured that system operators are now looking at ways to incorporate higher levels of RES-E penetration than they would have had the requirement not been set out in the Directive. An example of this is the DS3 programme which is underway in Ireland, which aims to deliver higher levels of renewable electricity penetration without compromising the security of the electricity system. It is essential that the principles of priority dispatch and the requirement to minimise curtailment are enshrined in the new RED going forward. This reinforces the policy of moving to a sustainable energy system.
However, the RED has lacked the tools to follow through the ambitious EU renewable energy objectives. Since 2011, several Member States have questioned the appropriateness of renewable support schemes and have proceeded with abrupt cuts in national support mechanisms thus undermining the viability of existing projects. The RED has not prevented these retrospective changes which have had a significant impact on investor confidence.
Stable frameworks, therefore, remain crucial for sustaining wind energy deployment and the EU renewable energy ambitions. In light of delivering the 2030 renewables target, IWEA calls on the European Commission to learn from the shortcomings of the current regime and ensure that a more reliable and stable regulatory framework with the appropriate safeguard measures and enforcement tools is in place beyond 2020.
The RED does not appear to have the desired effect in encouraging and enabling cross-border trading of renewables. The lack of clear information in relation to penalties for not achieving targets has resulted in uncertainty in relation to the need for cross border trade and therefore barriers still remain in the implementation of cross-border renewable generation projects.
While significant progress has been made in the electricity sector, further work is required in the areas of heating, cooling and transport. The opportunities to electrify heating and transport remain largely unexploited. To meet the CO2 and RES targets for 2030, further consideration should be given to electrification of other sectors such as heating, cooling and transport by Europe.

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	◉	○	○	○	○

Best practice is derived from the implementation of the existing Renewable Energy Directive	○	◉	○	○	○
Regional consultations on renewable energy policy and measures are required	○	◉	○	○	○
Member States consult on and adopt renewable energy strategies that serve as the agreed reference for national renewable energy policies and projects	○	◉	○	○	○
The Commission provides guidance on national renewable energy strategies	◉	○	○	○	○

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

3600 character(s) maximum

The mid-term evaluation of the RED clearly concluded that the RED owes its effectiveness to its three main instruments - binding national renewable energy targets, national renewable energy action plans (NREAPs) and biennial reporting. Altogether, these provisions have provided clarity on national renewable energy deployment potential and have driven investments in wind energy across the EU.

In October 2014, EU Heads of States and governments agreed on an EU-wide binding target for renewable energy of at least 27% for 2030. The 27% objective will not be broken down in national targets thus raising questions about its enforceability. Member States agreed that a “reliable and transparent” governance system will be put in place to ensure “transparency and predictability for investors” and to clarify planning, reporting and monitoring provisions beyond 2020.

However, wind energy investors are faced with a regulatory vacuum for the post-2020 period due to the unclear set-up of the governance mechanism. This prevents timely investment decisions and endangers the bankability of renewable energy projects. It remains unclear how Member States will be incentivised to collectively pledge higher than 27% and who shall be responsible in case of non-delivery of the 2030.

It is essential that a robust, reliable and transparent governance system is in place to provide investors certainty for the post-2020 period and ensuring that investment decisions and instruments will remain within the EU.

Guarantees should be in place to ensure well-defined commitments of Member States to renewable energy deployment and efficient oversight of the European Commission over target delivery.

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	◉	○	○	○	○
In relation to national/regional natural resources, specific technology relevant trajectories for renewable energy up to 2030	○	◉	○	○	○
Overview of policies and measures in place and planned new ones	○	◉	○	○	○
Overview of renewable energy trajectories and policies to 2050 to ensure that 2030 policies lie on the path to 2050 objectives	◉	○	○	○	○
Qualitative analysis	◉	○	○	○	○
Trajectories for electricity demand including both installed capacity (GW) and produced energy (TWh)	◉	○	○	○	○
Measures to be taken for increasing the flexibility of the energy system with regard to renewable energy production	◉	○	○	○	○
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	◉	○	○	○	○

Please explain.

3600 character(s) maximum

National energy and climate plans will be the backbone of the governance system and therefore they should be reliable, transparent, comparable, and legitimate to enable the fulfilment of the 2030 renewable energy target. It is also vital that all Member States plot a trajectory for decarbonisation of the energy system, taking into account contributions to heating and cooling, to achieve the EU long-term goal of reducing greenhouse gas emissions by 80-95%

below the 1990 level by 2050.
Energy and climate planning is crucial to moderate policy uncertainty and its repercussions on investment risk and to subsequently enable the cost-effective deployment of renewables by 2030.
National plans should inform wind energy investors of future markets growth potential and help them make investment decisions. National plans should provide an early indication of Member States concrete contributions to the 27% target.
It is of utmost importance that plans are developed well in advance of 2020 to ensure a smooth transition towards the 2030 period. To that end, a clear timeline needs to be defined for submitting national plans.

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.

3600 character(s) maximum

The objective of the wind industry is to be competitive in a fair and fully liberalised electricity market, delivering the benefits of wind energy in the most affordable way. Investments made possible by long-term volume targets supported by well-designed support mechanisms help drive down costs and will enable on-going reduction and ultimately remove the need for specific support.

To promote dynamic support mechanisms without overcompensation while market integration and liberalisation progress, wind energy support mechanisms should be designed to deliver more convergence, or made more compatible. This should be done while taking into account varying grid access costs, administrative costs, access to (and cost of) capital and national fiscal frameworks. With increasing wind energy penetration levels, support mechanisms should also encourage greater market responsiveness.
Further work needs to be carried out in relation to Cooperation Mechanisms which provide Member States with the opportunity to open their support schemes to renewable energy producers in other countries. This could be done in combination with the gradual alignment of support schemes. Partial opening of support schemes, joint projects and regional schemes provide other means to increase consistency and adopt a more cost efficient approach to RES.
Therefore IWEA believes there is scope for progressing three of the options outlined above:
Regional level support schemes (group of Member States with joint support scheme) where appropriate

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

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?

3600 character(s) maximum

As pointed out in question above, IWEA believes that convergence of support mechanisms is more appropriate than full harmonisation or regionalisation of support schemes to allow for the cost-effective deployment of renewables in the EU at this time. A fully harmonised support scheme would not take into account varying grid access costs, administrative costs, access to (and cost of) capital and national fiscal frameworks. Therefore there is a need for convergence in the framework conditions (such as market rules, grid connection policies and costs, planning requirements, etc.) between different member states in order to move towards a more regional approach to support schemes. There may be cases where regional support schemes are appropriate and these should be encouraged.

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.

3600 character(s) maximum

Cooperation mechanisms have a role to play in any scenario for 2030 cost-effective target achievement. A more coordinated approach would promote the development of projects at locations where they provide the most value for money thereby promoting cost-effectiveness. Yet, the lack of clarity on compliance arrangements for the 2030 renewables target raises questions as to the feasibility and attractiveness of flexibility mechanisms. The European Commission should set indicative benchmarks for each Member States, which aggregated, amount to the 27% and should be enshrined in the new Renewable Energy Directive. Based on the benchmark, Member States should define their renewable energy component of national climate and energy plans, well in advance, as well as if an how they intend to use cooperation mechanisms. This

will give a clear signal to other Member States and will also help incentivise the voluntary use of cooperation mechanisms in the post-2020 period, and can facilitate regional cooperation on renewables. It might be easier to partially open existing support schemes to cross-border projects than agreeing on a new joint scheme between Members States, however guidance from the Commission could be useful in this regard.
The success of cooperation mechanisms beyond 2020 will largely depend on the Commission's ability to create incentives that make cooperation economically attractive. Member States that go beyond the Commission's proposed growth path, including through cooperation mechanisms, should receive incentives in proportion to their ambition.

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	○	◉	○	○	○
Administrative complexities	○	◉	○	○	○
Lack of cost-effectiveness / uncertain benefit for individual Member States	○	◉	○	○	○
Government driven process, not market driven	○	◉	○	○	○
Member States reluctant to see their taxpayers/ consumers' money used for investments outside their country	◉	○	○	○	○

Other? Please explain.

3600 character(s) maximum

There are a number of reasons behind the limited use of cooperation mechanisms under the 2020 framework, in particular the lack of clarity from the European Commission as to the penalties that would be imposed on the Member States failing to meet their 2020 target has prevented them from making a proper cost-benefit analysis justifying cooperation mechanisms.
A significant challenge to cross-border cooperation arises from the fact that the implementation of cooperation mechanisms was also vested mainly on Member State governments, which hindered the involvement of private investment to the cost effective development of projects. There can also be significant challenges arising from the uncertainty and complexity of assumptions underlying the arrangement and compensation of direct and indirect cost and benefits between Member States, as well as differing regulatory regimes in relation to grid connection and infrastructure which can provide additional barriers.

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.

3600 character(s) maximum

IWEA supports cooperation between Member States, including the support of wind power production from a national support mechanism for non-national projects. Further market and grid integration would help facilitate this objective by enabling increased flow of electricity between Member States. This is particularly relevant for island systems such as Ireland. Interactions with existing schemes have to be taken into account to ensure that any negative retroactive implications on existing investments are avoided. IWEA is also of the view that the Commission should prepare guidance and frameworks for agreements between member states in order to facilitate opening of support schemes, taking into account the contribution of investors.

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	○	◉	○	○	○
EU-level requirements on market players to include a certain share of renewables in production, supply or consumption	○	○	◉	○	○
EU-level financial support (e.g. a guarantee fund in support of renewable projects)	○	◉	○	○	○
EU-level support to research, innovation and industrialisation of novel renewable energy technologies	○	◉	○	○	○
Enhanced EU level regulatory measures	◉	○	○	○	○

Any other ideas or comments, please explain.

3600 character(s) maximum

A robust, reliable and transparent governance system is key to providing investors certainty for the post-2020 period and ensuring that investment decisions and instruments will remain within the EU. Establishing such a reliable system will ensure that the 2030 binding target is met

cost-effectively.
The European Commission should define, as part of the post-2020 Renewables Directive , a course of action in case national contributions do not add up to the EU-wide target.
If the national contributions were not to add up to the EU wide objective, the Commission should engage with Member States, in particular those with contributions below the level originally suggested, and make proposals to ensure the EU-wide renewable energy target is met:
1. The Commission should broker cooperation mechanisms ensuring a cost-effective implementation of the EU-wide target. The Commission should come up with a guidance on the use of flexibility mechanisms in the post-2020 period.
2. If the Member State commitments to cooperation mechanisms are insufficient to cover the gap between the sum of the national contributions and the EU-wide target, the European Commission should be able to activate a dedicated programme to meet the target from January 2020.

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?

3600 character(s) maximum

Stable regulatory frameworks therefore remain crucial for sustaining wind energy deployment and the EU's global leadership. A robust governance system for the 2030 target is key to providing long-term predictability to investors. The governance mechanism needs to be set in legislation, providing clarity over Member States concrete contributions to the 27%, outlining safeguard measures and providing enforcement tools for the European Commission to oversee and ensure target delivery. Increased cross-border trading in renewables should also be promoted as a measure to ensure the EU can be "number one in renewables". Changes in the market provisions are of utmost importance in order to build a market which is fully fit for renewables, with particular focus on functional, liquid and better integrated short-term intraday and balancing markets.
The electrification of sectors such as transport, heating and cooling is an effective way to further enhance the contribution of renewables in these sectors. As decarbonisation of the power sector progresses, electrification will drive further improvements in the use of renewables in heating and transport.
There is therefore a need for more harmonized EU rules in a number of areas, including permitting procedures, and spatial and environmental planning. It is essential that there is coordination between different Directives relating to environmental policy and that the transition to decarbonisation of the energy sector is not overly restricted by requirements under other European legislation. It is essential to ensure that a coordinated approach is followed in this regard. 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.
As we approach higher levels of renewable penetration more work will need to be carried into new ways of operating the electricity system, and further research, development, deployment and cost reduction of supporting technologies will be required. Work is underway in Ireland through the DS3 programme, to look at what services are required to ensure higher levels of renewables can be used. This will need to take place at a European level. In order to continue the trajectory to decarbonisation by 2050 it is essential that research is carried into the operation of the transmission system and the new or emerging technologies that are required. This should be facilitated and promoted by the Directive.

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.p

[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	○	○	○	◉	○
Surplus electricity that is not self-consumed onsite cannot be sold to the grid	◉	○	○	○	○
Surplus electricity that is not self-consumed onsite is not valued fairly	◉	○	○	○	○
Appliances or enabler for thermal and electrical storage onsite are too expensive	◉	○	○	○	○
Complex and/or lengthy administrative procedures, particularly penalising small self-consumption systems	○	◉	○	○	○
Lack of smart grids and smart metering systems at the consumer's premises	○	◉	○	○	○
The design of local network tariffs	○	○	○	○	◉
The design of electricity tariffs	○	◉	○	○	○

Other? Please explain.

3600 character(s) maximum

There is currently no support provided for domestically produced renewable energy in Ireland. A number of people have invested in renewable energy systems at a time when there was a tariff available, however they now find themselves in a situation where they are not able to sell excess energy

produced to the grid. They are providing energy to the grid at times however no value is being assigned to this energy. At a minimum the energy produced should be offset from the consumers' bill.
The introduction of smart grids and smart metering systems should promote the use of domestically produced renewable energy and should ensure that the units exported are appropriately valued.
The RED should ensure that a value can be assigned to domestically produced renewable energy to ensure that this is supported and to give consumers an opportunity to participate in the decarbonisation of the electricity system.

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

- [ ] Highly under-exploited
- [x] 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?

3600 character(s) maximum

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	○	○	◉	○	○	○
Lack of administrative capacity and/or expertise/ knowledge/information at the local level	◉	○	○	○	○	○
Lack of energy strategy and planning at local level	○	◉	○	○	○	○
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.

3600 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	○	○	◉	○	○

Other? Please explain.

3600 character(s) maximum

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?

3600 character(s) maximum

GOs and information disclosure are very important aspects to drive demand from a pure market perspective. The more consumers are aware of the energy they consume, they more they will be able to make informed choices and demand their supplier to provide renewable-based energy (e.g. wind power). The GO scheme in Europe should be further deployed, continuing to distinguish the specific origin of the source.
The GO should not only include renewable electricity, but be extended to all sources of energy. Consumers should have the right to be informed on whether they are purchasing nuclear, coal, gas or large hydro energy, besides the renewable one.
GO for gas (e.g. biogas, green hydrogen) could also help developing these markets, indirectly leading to an increased demand of renewable electricity.

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)	○	○	○	○	◉
Lack of administrative capacity and/or expertise/ knowledge/information at the national and local level	○	○	○	○	◉
Lack of energy strategy and planning at the national and local level	○	○	○	○	◉
Lack of physical space to develop renewable heating and cooling solutions	○	○	○	○	◉
Lack of requirements in building codes and other national or local 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.

3600 character(s) maximum

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?

3600 character(s) maximum

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	◉	○	○	○	○
Shorter trading intervals (e.g. 15 min)	○	◉	○	○	○
Lower thresholds for bid sizes	◉	○	○	○	○
Risk hedging products to hedge renewable energy volatility	◉	○	○	○	○
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.

3600 character(s) maximum

The cross-border integration of liquid intraday and balancing markets is a cornerstone of an efficient operation of the market with large amounts of wind. Harmonised intraday gate closure times closer to real time will allow wind power generators to adjust their balances by trading as close as possible to real time.
The market should provide signals for investment in storage capabilities which respond to the needs of the system. There is also a role for Demand Side response, however this is likely to require the widespread roll out of smart metering with dynamic pricing.

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)?

3600 character(s) maximum

IWEA believes that balancing responsibility is possible and desirable in systems that allow participation of wind generators through products and rules that take into account the intrinsic variability of their primary resource. However, exemptions from balancing responsibility should remain where no level playing field is ensured for wind power generators. In most cases, they are only partly allowed to participate in balancing markets, and often only in providing replacement reserves. Overall, balancing market arrangements seem to be applicable for conventional power generators mostly.
Therefore, all future considerations by policy makers on balancing responsibilities by wind power generators need to take into account market maturity as well as the penetration level of wind power in the respective power system. Market-specific boundary conditions under which balancing responsibility by wind power generators can be borne include:

- Existence of a functioning intraday and balancing market;
- Balancing market arrangements providing for the participation of wind power generators, as e.g. short bidding periods;
- Market mechanisms that properly value the provision of ancillary or grid support services for all market participants including wind power;
- A satisfactory level of market transparency and proper market monitoring;
- Sophisticated forecast methods in place in the power system;
- The necessary transmission infrastructure.

Any market developments need to ensure that renewable generation is not overly penalized by the requirement for balance responsibility where the tools to manage this are not in place.

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.

3600 character(s) maximum

Important barriers faced by wind energy developers when it comes to grid connection are often related to an absence of clear information on the available grid connection capacity, a lack of planning for future grid extension and reinforcements on behalf of system operators, and insufficient grid capacity. Regarding this latter point, guaranteed or priority access is key to ensuring the development of the grid infrastructure necessary to effectively integrate wind energy in a non-discriminatory way.
Importantly, curtailments should not be seen as a strategy for optimising grid investments. Voluntary or market-related curtailment has to be understood as an ancillary service in terms of providing downward reserve capacity or balancing energy, for which system operators would have to define rules and share cost calculation principles transparently with generators.
Well defined and clear rules for curtailing wind power generation would reduce risks for wind generators as new market entrants, specifically by providing compensation rules for curtailments. These compensation mechanisms should be separate revenue streams to those taken into consideration in the calculation of support mechanisms based on energy output.

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?

- [x] 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?

3600 character(s) maximum

Priority dispatch is an enabler for wind energy deployment addressing the needs of a new entrant in a market structure designed for conventional technologies. As a symptom of this antiquated market design, there is often a lack of transparency in operation and curtailment rules representing an

additional market risk which wind energy generators need to be hedge for. Priority dispatch is a policy-driven solution ensuring winds intrinsic characteristics are not a barrier to its exploitation.

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	○	◉	○	○	○
Online application for permits	○	○	◉	○	○
A defined maximum time-limit for permitting procedures, and effective consequences if deadline is missed	◉	○	○	○	○
Harmonisation of national permitting procedures	○	◉	○	○	○
Special rules for facilitating small-scale project permitting, including simple notification	○	◉	○	○	○
Pre-identified geographical areas for renewable energy projects or other measures to integrate renewable energy in spatial and environmental planning	○	○	◉	○	○

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.

3600 character(s) maximum

Fair and shorter permitting and connection procedures would significantly reduce project development costs for wind developers. The Renewable Energy Directive did not measurably help to reduce lead-times. There is also a need for clarity in relation to environmental impact processes and coordination between the different policy areas in this regard.

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

3600 character(s) maximum

Network companies and system operators have a central role in the fundamental changes affecting the structure and operation of the electricity system.

Innovation is a key tool in relation to the efficient use of the network. With increasing levels of renewable generation, which often connects at the distribution level, there is a fundamental change to the way the electricity system is being used. This requires innovation and looking at new ways of developing the infrastructure, as well as strong coordination between relevant stakeholders.
The planning process for both new generators and for network assets can often be difficult. There may be a need for increased coordination between the planning process and grid connection processes as the interdependency between them increases.

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	○	○	○	○	◉
Cost of compliance	○	○	○	○	◉

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

3600 character(s) maximum

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	○	○	○	○	◉
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?

3600 character(s) maximum

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

3600 character(s) maximum

Social acceptance of wind energy in the EU is generally high with 89% of Europeans being favourable to wind energy projects. However, as with many infrastructure developments, there can often be concerns raised by individuals and members of local communities where the projects are to be located.
We strongly consider that many concerns raised around renewable energy projects can be dealt with through clear lines of early and consistent communication, engagement and the provision of factual information. IWEA has been working as part of a pan European consortium with the European Wind Energy Association (EWEA) on social acceptance issues in the framework of WISE Power, an EU-funded project aiming to increase local awareness and participation in the planning and implementation of wind power projects. The project has identified that social acceptance could be improved when an open dialogue and awareness-raising are promoted by both public authorities and wind project developers and when local communities can participate and benefit from wind farms deployment.
IWEA also believes that the proactive dissemination of positive factual information through information campaigns is a vital aspect of ensuring that our energy citizens have clear access to the factual information they need. IWEA has also been at the forefront of seeking to provide information to communities and individuals across Ireland through a national media campaign specifically focused on our high (85%) Irish Energy Import dependency, and focusing on the huge positive potential Ireland has in our renewable energy resource. This information campaign which commenced in January 2016, is entitled “The Power to Power Ourselves” and through TV, Radio and online content has sought to engage those people who may not have considered our energy needs and where they are met from. Information on this campaign is available at www.windenergy.ie
IWEA has also long been at the forefront of providing guidance within the Irish wind and renewable energy sector on best practices in Community Engagement, and in 2013 published the guidance document entitled “Good Neighbour: IWEA Best Practice in Community Engagement & Community Commitment.” We consider this kind of industry guidance as working hand in hand with public policy approaches.

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	○	○	○	○	○
Reduce dependency on oil imports	○	○	○	○	○
Increase diversification of transport fuels	○	○	○	○	○
Increase energy recovery from wastes	○	○	○	○	○
Reduce air pollution, particularly in urban areas	○	○	○	○	○
Strengthen the EU industry and economy competitiveness	○	○	○	○	○
Stimulate development and growth of innovative technologies	○	○	○	○	○
Reduce production costs of renewable fuels by lowering the level of investment risk	○	○	○	○	○
Facilitate fuel cost reduction by integration of the EU market for renewable fuels	○	○	○	○	○

Any other view or ideas? Please specify

3600 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.

3600 character(s) maximum

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.

3600 character(s) maximum

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