

# Renewable Energy Strategy

## IDENTIFICATION

1. Please enter your name and, where relevant, the name of the organisation you represent. Please include also an e-mail address for contact purposes for use only if we need clarification about your responses.

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2. Are you responding to this questionnaire on behalf of /as: Industry

2.1. Is your organisation registered to the "Register of Interest representatives"? Yes

3. Please indicate your country Other (please specify)

Which other country?

EU-wide membership organisation

4. How would you prefer your contribution to be published on the Commission website, if at all? Under the name indicated (I consent to publication of all information in my contribution and I declare that none of it is under copyright restrictions that prevent publication)

## A. GENERAL POLICY APPROACH

A.1. Is there a role for new targets for renewable energy sources post-2020 assuming that any targets must be consistent with climate mitigation and energy efficiency policies and targets as is currently the case with the 20/20/20 targets in the Europe 2020 strategy? Yes, a mandatory target at EU level is appropriate

A.1.1. Please explain the reasons for your answer (such as the scope and contribution from GHG targets/ETS, the need to address other environmental, security of supply or technological development benefits)

Investments in renewable energy are very long-term and only possible if assisted by policies that support a relatively safe long-term assessment of expected risks and returns. Mandatory targets would help to give investors confidence that policies providing long-term visibility and stability will be put in place. They also help to reduce the risk of retroactive changes to policy, which damage investor confidence and hamper the prospects of attracting large scale private investment to the renewable energy sector.

A.2. Are other policy elements necessary to promote renewable energy post-2020, such as: Facilitation policies (faster and easier permitting, improved access to the grid and further grid investments, availability of more sites for renewables, etc)  
Abolition of support mechanism or subsidies to other energy sources  
Continue to ensure sustainability and scalability  
Other (please specify)

Please specify which other policy elements?

Provide clarity on the application of the EU unbundling legislation, as whether intended or not, this directive is acting as a barrier to institutional investors ability to provide direct and significant financing for long term investments in both generation and transmission including renewables. Engagement with the financial sector generally is critical given the scale of investment required and the inability of utilities to finance investment unilaterally. The finance sector is also facing differing challenges which need to be taken into account. Specifically, we would encourage the Commission to continue a close dialogue with IIGCC with a view to creating a market environment that stimulates long term institutional investors to increase investment in renewable energy.

## B. FINANCIAL SUPPORT

B.1. Do you consider that financial support will continue to be necessary to support renewables For selected technologies/circumstances/markets (please specify)

post 2020 given their expected greater penetration?	
Please specify which technologies/circumstances/markets	
While subsidies are still needed for renewables today, in the future this will depend, for example on equipment prices and the price for renewable energy and conventional energy. The effect on future prices of all this is difficult to predict today. The key from an investment perspective is that renewable energy policy supports the long-term assessment of expected returns on investment. For investors to continue to invest in renewable, it is critical that consistent, stable and well-communicated incentive programmes, with clear and transparent rules are put in place. In general, we would be happy to see wind and solar equipment prices so low in the future, as not to require a subsidy at all, while providing adequate returns, this would provide more certainty in itself for investors. But it would be important to provide a more fair and even playing field between renewable and conventional energy. We also continue to encourage measures to provide an effective carbon price that will support a shift into low carbon investment.	
B.2. If renewable energy sources require support post-2020, how do you think this can best be achieved with a view to achieving a cost-effective deployment?	
B.3. Do you think it would be useful to develop common approaches as regards Member States' financial support for renewables?	
B.4. Should the structure of financial support be gradually aligned EU-wide?	N/A
B.5. With regard to questions B.3. and B.4. please specify if you see a difference between the different sectors (electricity, heating and cooling, transport).	
B.6. How do you see the relation between support schemes for renewable energy and the requirements of the internal electricity market for the period after 2020 against the background of a rising share of renewables?	
B.7. Do national support schemes and differences between such schemes distort competition?	

### C. ADMINISTRATIVE PROCEDURES

C.1. Which of the following issues relating to administrative procedures, information and training do you consider acting as a serious impediment to further growth of renewables following Member States' implementation of the provisions of the Directive?	Length and complexity of administrative procedures relating to authorisation/certification/licensing
C.1.1. Please provide explanations and specific examples where available	
Some of our members feel that planning and permitting has been challenging in some countries, for example where a lack of zoning plans creates uncertainty and lengthy processing times particularly within local agencies and governments can create bottlenecks in the process.	
C.2. Which policy response to the problems identified above do you consider appropriate?	Other (please specify)
Please specify which would be in your view a workable solution to eliminate barriers	
We encourage the EU to make specific recommendations under current legal framework for removing administrative barriers resulting from national planning regimes and to provide clear guidance on the meaning of ambiguous terms, including "priority access".	

### D. GRID INTEGRATION OF ELECTRICITY FROM RENEWABLE ENERGY SOURCES

D.1. Do you consider that any of the following national rules and framework conditions will still create obstacles to renewable energy production after 2020?

D.1.1. Please specify which obstacles and the nature and degree of them for each

D.2. Which renewables-specific grid related rules do you consider necessary and proportionate in a post-2020 perspective?

D.2.1. Please explain why

D.3. With regard to system integration of wind and solar power, what measures do you consider most important to increase the flexibility reserve of the system:

## E. MARKET INTEGRATION

E.1. In which of the following ways could renewable energy be made responsive to market signals?

E.2. How can it be ensured that market arrangements reward flexibility?

E.3. In how far do you think today's market design needs to be adapted to provide an appropriate framework for renewables

## F. RENEWABLES IN HEATING AND COOLING

F.1. What do you consider to be the main barriers against a stronger uptake of renewable energy in the heating and cooling market beyond 2020?

F.2. What pathways do you consider to be the most promising for further increasing the share of renewable energy in heating and cooling beyond 2020?

F.3. How do you see the interaction of promoting further use of renewable energy in heating and cooling and enhancing energy efficiency in this sector?

## G. RENEWABLES IN TRANSPORT

G.1. What do you consider to be the main barriers against a stronger uptake of renewable energy in transport?

G.2. What sectors of transport do you consider to be the most promising for further increasing the share of renewable energy?

G.2.1. Please explain your answer

## H. SUSTAINABILITY

H.1. Do you think that additional sustainability criteria are necessary in the post 2020 period?

H.1.1. Please explain

## I. REGIONAL AND INTERNATIONAL DIMENSIONS

I.1. Do you consider current rules for cooperation between Member States sufficient to fulfil their purpose, i.e. realisation of cost-efficient renewable potential in the EU?

I.2. Do you think the EU should further facilitate cooperation with third countries when it comes to the development of the potential for renewable energy?

I.3. Should investments in electricity networks in some Member States (i.e. Spain, Greece, Italy) be prioritized for this purpose?

I.4. Which measures do you consider appropriate and necessary in order to foster cooperation with third countries in this area?

I.5. In its Communication on security of supply and energy cooperation - "The EU Energy Policy: Engaging with Partners beyond our Borders", the European Commission proposes to promote cooperation on renewable energy projects with the Southern Mediterranean countries and to gradually build a renewed EU-Mediterranean energy partnership focus on electricity and renewable energy. How do you consider this should relate with the EU internal renewables policy? What should be the priorities?

I.6. The possibility to explore regional cooperation and a coordinated, more strategic approach to grid connection for the rapidly growing volume of offshore wind generation in the North Sea is currently being explored in the framework of the North Sea Countries Offshore Grid Initiative (NSCOGI). Do you think such cooperation should be further fostered? What benefits do you think could arise from it? Do you consider that this experience could be generalised and applied elsewhere?

## J. TECHNOLOGY DEVELOPMENT

J.1. For a first set of renewable technologies, namely wind, solar, bio-energy, the SET Plan aims at a cost-competitive market roll out of renewable energy by 2020. It also aims at enabling integration of renewable energy into the electricity grid and smart cities and communities. In your view, what would be the remaining key challenges of these technologies to be addressed by research and innovation in view of the 2050 objectives?

J.2. Which additional measures and/or instruments should be developed to address these technologies and their remaining challenges and to ensure that the EU innovation fabric is geared to supporting the significant deployment up to 2050?

J.3. In your point of view, which technologies other than those covered by the current industrial initiatives should be given priority in the post-2020 perspective? Please justify with reference to the criteria mentioned above, i.e. large-scale availability and willingness of industry to engage in public private partnerships?

J.4. How successful do you consider the existing measures have been and which have been the main drawbacks?

J.5. Do you consider that assistance in technology development should be linked to a certain result to be achieved by a certain deadline?

### Meta Informations

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