

## Consultation on streamlining of planning and reporting obligations as part of the energy union governance

### EGEC response Executive summary

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#### **General remarks**

The European Geothermal Energy Council welcomes the development of a new Energy Union governance system based on integrated national plans and reports addressing all the different streams of the EU energy and climate policy. Such development paves the way to a more holistic approach and may facilitate the exploitation of the many synergies between the various dimensions of the Energy Union.

However, due to their political nature, integrated plans and reports would not be the most appropriate carriers of some detailed and technical information needed to enable effective evaluation and corrective actions. This is why specific requirements in areas with targets should not only be agreed and enshrined in sectorial legislation, but may also be left out from the integrated plans and reports.

#### **Evaluation of current planning and reporting requirements**

Planning and reporting requirements in areas with EU binding targets have significantly contributed to:

- increasing transparency and investor confidence;
- guiding and enhancing planning and policy-making at all levels;
- identifying and exchanging best practices;
- promoting a concerted dialogue between public authorities and the private sector, including SMEs;
- allowing aggregation of data at EU level;
- facilitating an informed evaluation over the effective and efficient implementation of EU legislation; and
- enabling enforcement and corrective actions so as to ensure that targets are achieved.

For renewable energy, area with an EU-wide binding target, the post-2020 plans should **as much as possible keep the positive elements of the current system** with trajectories and developments in terms of simplification of administrative procedures and other policy developments **broken down by sector, source, and enabling technology**. This has proven to be successful in triggering a concerted dialogue between governments and the representatives of emerging renewable energy sectors, in removing some non-technical barriers, in increasing

awareness and resource assessment for all RES technologies, and in promoting innovation. In line with the objective to develop the next generation of renewable energy technologies, public investment in R&I for renewable energy technologies should also be reported.

In terms of burden, the report on the Mid-term Evaluation of the Renewable Energy Directive<sup>1</sup> has found that the administrative burden resulting from the binding national renewable energy action plan seems reasonable. Additionally, the same study shows that binding governance was a particularly effective way to ensure transparency, investor certainty, and accountability.

### ***Options for streamlining planning and reporting obligations***

Non-binding guidance for both planning and reporting would have a serious detrimental impact on the implementation of EU legislation. Standard templates must be used as they are the only credible way to allow the Commission to measure progress and take remedial measures.

In terms of streamlining, there is room to bring together a number of planning and reporting requirements, e.g. projected and actual demand, infrastructure planning, and emissions in different sectors of the economy. Any evaluation in that respect could be carried out only following (and not prior to) the revision of the current legislative framework. The contrary would preempt the proposals for the revised directives as well the negotiations between the co-legislators.

Due to their political nature, integrated plans and reports would not be the most appropriate carriers of some detailed, technical, but still crucial information. Including all the necessary requirements into one single document may actually increase the administrative burden for national administrations. This is why **specific planning and reporting requirements in areas with targets should be agreed and enshrined in sectorial legislation and may left out from the integrated plans and reports.**

### ***Options for the governance system of the Energy Union and its process***

The governance system of the Energy Union must comply with the principles of **good governance**; planning and reporting requirements must directly stem from sectorial legislation. Instead, a soft process (open method of coordination) would be incapable of providing a credible framework.

Both co-legislators should be involved in the decision-making process from the very beginning. As much as possible, regional and local authorities as well as other stakeholders should also be consulted. The new governance system should pave the way for a smart enhanced regional cooperation open to EEA countries and based on a voluntary basis.

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<sup>1</sup> Available at: (available at: [https://ec.europa.eu/energy/sites/ener/files/documents/CE\\_Delft\\_3D59\\_Mid\\_term\\_evaluation\\_of\\_The\\_RED\\_DEF.PDF](https://ec.europa.eu/energy/sites/ener/files/documents/CE_Delft_3D59_Mid_term_evaluation_of_The_RED_DEF.PDF))