

Renewables Directive

Informal EURELECTRIC input on the Council position (REV 3-13 November 2017)

Integration of RES into the market

EURELECTRIC fully supports proposals aiming at integrating RES into the market and making support for RES, when need, more market-based. In this regard, while EURELECTRIC supports technology neutral support schemes, we welcome the fact that in certain circumstances Member States have the possibility to choose technology-specific schemes. We regret that compared to REV2 further clarification hasn't been included, when support is granted through tendering, about high project realisation rates (pre-qualification requirements, penalties for delay/non-delivery, investment horizon). The Commission should also be requested to revise the Environment and Energy State Aid Guidelines (EEAG) within months of the adoption of the directive in order to ensure a stable regulatory framework until 2030.

Cross-border opening of support schemes

EURELECTRIC notes that in REV3 the cross-border opening of financial support becomes optional. If a requirement is re-introduced, links with interconnection capacity should be too.

Guarantees of Origin (GOs)

EURELECTRIC is concerned by changes introduced compared to REV 2 that threaten the use of GOs: it is unclear why article 19(8) now proposes that an electricity supplier "may" instead of "shall" use GOs to prove the share or quantity of energy from RES. Similarly, the deletion of article 19(13) mandating the use GOs when suppliers market energy from RES or highly-efficient cogeneration to consumers with a reference to environmental or other benefit, is worrying. Together these changes would severely undermine the trust customers can have that GOs prove that a given share of energy was produced from RES (or high efficiency cogeneration). However, we welcome the extension of the validity of GOs from 6 to 12 months after the production which would avoid the loss of GOs not issued until after 6 months.

Renewable self-consumers & Renewable Energy Communities (RECs)

We welcomed the proposals from the Council in REV2 aiming at further integrating renewable self-consumers and RECs into the market such as deletion of thresholds/exemptions in article 21 or the acknowledgement that RECs should be subject to cost-reflective network charges. Additional changes in REV3 emphasize the importance of ensuring that there is no discrimination between renewable self-consumers and Renewable Energy Communities members and other system users.

RES in transport

EURELECTRIC welcomes the development back towards a fuel supplier obligation. However, the burden of target achievement seems still to stay with the Member State which has to "ensure that the share of renewable energy supplied for final consumption in the transport sector is at least [12%]". We believe that a clear fuel supplier obligation is the better way to go forward. Furthermore, we strongly call for doing this in a harmonised manner, and thus only to this via renewable energy obligations and not by other measures.

Besides, moving towards a fuel supplier obligation, it has to be clarified that suppliers of electricity to the transport are not obliged to comply with the sub-obligation of advanced biofuels.

We welcome the acknowledgement that electric motors are around 5 times more efficient than internal combustion engine motors. The multiplier has an important effect when it comes to the transfer or trading of obligation between fuel suppliers. We are concerned with the fact that the Council removed the reference to the transfer of obligation, which –in combination with the multiplier –would have ensured a level-playing field for different fuels to compete to deliver the most cost-effective achievement of the obligation.

If the Council wants to stick to the inclusion of first generation biofuels under the fuel supplier obligation and the inclusion of renewable electricity in rail with a multiplier of 2.5, the target level has to be corrected upwards. With the proposed multiplier and expected levels of EV uptake, renewable electricity in road and rail can make up between 9.5% and 12.5% of energy consumed in EU road and rail transport in 2030.

Sustainability criteria for biomass

We note that, compared to REV2, Member States may introduce additional sustainability requirements. These could impede trade and investment in biomass. It is therefore crucial that Member States are not allowed to refuse to take biomass into account if it fulfils the criteria established in the directive, as REV3 maintains. We repeat our concerns about the restrictions in article 26(8) that would prevent electricity produced from biomass, meeting the sustainability criteria, from receiving financial support and being counted towards the RES target. Biopower only could be used to supply essential system services and flexible generation to complement variable RES.