

To:

Ms. Kadri Simson, Commissioner for Energy

Mr. Virginijus Sinkevičius, Commissioner for Environment

05th May 2022, Brussels

Object: Power Industry's recommendations for accelerating permitting as a prerequisite for Europe's energy independence and decarbonisation

Dear Commissioners,

As it was recognised recently by the President of the European Commission, renewable energy deployment is a strategic investment, not only for our decarbonisation targets, but increasingly so for our energy independence and security of supply. Every kilowatt hour of renewable energy secures our future and we need as much as 550 GW of new RES capacity by 2030, according to pre-war scenarios. The power industry stands ready to deliver this renewable energy and further integrate it in the energy system through direct electrification of end-use sectors. However, permitting remains the major bottleneck, as we have been pointing out in the past years in [our advocacy](#).

In this context, **Eurelectric welcomes and supports the provisions related to permitting in the RePower EU communication**, namely:

- The **full, rapid and effective implementation of REDII**
- The **recognition of the planning, construction and operation** of plants for the production of energy from **renewable sources, as well as their connection to the grid** and the related grid itself as **being in the overriding public interest and in the interest of public safety** and qualify for the most favourable procedure available in their planning and permitting procedures.
- The call for Member States (which should also target regions and municipalities) to **swiftly map, assess and ensure in their planning process that sufficient suitable land and sea areas that are available for renewable energy projects**, commensurate with their NECPS and 2030 targets and Biodiversity targets
- The European Commission's commitment to propose in the Nature Restoration Law that **Member States should take into account in their National Restoration Plans the limited and clearly defined areas particularly suitable for renewable energy deployment ("go to" areas)** - which should allow for an integrated approach to renewables deployment and biodiversity and climate protection-, as well as encouraging the Member States to use the review of the plans under the Maritime Spatial Planning Directive to facilitate the deployment of RES projects. In this context, the Commission should evaluate potential ways in which existing nature protection and environmental EU-legislation could be rendered more supportive of energy and climate objectives.

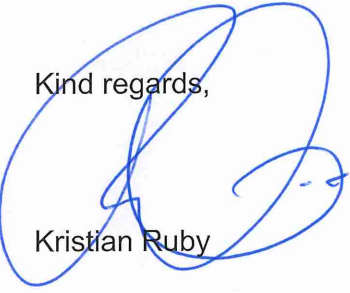
Eurelectric also welcomes the upcoming publication of the Guidelines on Accelerating Renewable Energy Deployment and contributed to the [open public consultation](#). Our industry is particularly hopeful that the European Commission will take into account in the guidelines the following recommendations:

- **The implementation of the rules** on permitting in REDII, namely the single contact point and the binding timeframes, should be a priority and **must be monitored accordingly**. The Commission should **develop clear Key Performance Indicators** (e.g. average approval time of projects, the number of resources allocated to permitting activities, the capacity (projects) denied due to exceeded deadlines determined by legislation, when such occurs by reasons not under the control of the market party etc.). Such a pro-active approach to monitoring of the implementation of permitting rules can be taken by the Commission through **an explicit consideration of the permitting process and their evolution at the relevant level in the National Energy and Climate Plans**.
- **The digitalisation of permitting** must also be pursued, in order to allow for more transparency and efficiency in the permitting process, as well as to enable data collection for reporting on KPIs.
- **The prioritisation of strategic RES projects** (for instance, in an advanced stage, located in just transition regions, or providing multiple benefits) **should be explored**.
- Building more renewable energy capacities requires also going towards a more integrated approach which allows for an optimized use of space, while promoting synergies between energy goals and biodiversity, infrastructure, societal and quality of life perspectives. Degraded areas or other abandoned areas could be repurposed to produce renewable energy, while agricultural lands could be used for agrivoltaics projects. Hence, **the potential for RES deployment in degraded areas and for multi-use of land should be explored**.
- **A fast-track process for refurbishment and repowering of existing RES sites** (including the optimal use and planning of sites where renewables are already installed, foreseeing simplified procedures and a fast screening of the exemption from the Environmental Impact Assessment Directive if no relevant impact is determined). Developers should have the possibility to improve the specific technology indicated in the permit if a more efficient design (e.g. wind turbine or PV panel) is available later during the permitting process. This should be possible without a need to restart the whole process.
- **A simplified notification regime for RES self-consumption projects in case no adverse effects on the environment are expected and existing infrastructure sites are used** (such as roof tops or facades). This should be sufficient when the expected generation of the RES site does not exceed the average annual self-consumption.
- **Continuous engagement with distribution system operators (DSOs) and transmission system operators (TSOs) for further investment in grid infrastructure** should be promoted (along with the possibility of co-investment coming from RES generators who require a connection). Grid operators shall benefit from the same fast and simplified procedures when realising grid modernization projects, for the purpose of RES integration

- A **Technical Support Instrument**, financed by the EU and directed at addressing the lack of administrative capacity and human resources in the Member States, could be introduced as a complementary solution. **Member States** should be required to **allocate the necessary funding of government institutions handling dispute resolutions**.

We remain at your disposal to further discuss the above recommendations and we look forward to the publication of the guidelines on permitting, which we believe should be a living document and should be conducive of a concrete and rapid implementation of existing rules to facilitate permitting.

Kind regards,



Kristian Ruby