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Targeted Consultation on Dedicated Grid Areas

Eurelectric response paper

9 December 2024

Eurelectric represents the interests of the electricity industry in Europe. Our work covers all major issues affecting our sector. Our members represent the electricity industry in over 30 European countries.

We cover the entire industry from electricity generation and markets to distribution networks and customer issues. We also have affiliates active on several other continents and business associates from a wide variety of sectors with a direct interest in the electricity industry.

We stand for

The vision of the European power sector is to enable and sustain:
- A vibrant competitive European economy, reliably powered by clean, carbon-neutral energy
- A smart, energy efficient and truly sustainable society for all citizens of Europe

We are committed to lead a cost-effective energy transition by:

investing in clean power generation and transition-enabling solutions, to reduce emissions and actively pursue efforts to become carbon-neutral well before mid-century, taking into account different starting points and commercial availability of key transition technologies;

transforming the energy system to make it more responsive, resilient and efficient. This includes increased use of renewable energy, digitalisation, demand side response and reinforcement of grids so they can function as platforms and enablers for customers, cities and communities;

accelerating the energy transition in other economic sectors by offering competitive electricity as a transformation tool for transport, heating and industry;

embedding sustainability in all parts of our value chain and take measures to support the transformation of existing assets towards a zero carbon society;

innovating to discover the cutting-edge business models and develop the breakthrough technologies that are indispensable to allow our industry to lead this transition.

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WG Regulation and Network Customers
WG RES and storage
WG Hydro

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1. WHY ARE YOU BEING CONTACTED?

- In line with the Grids Action Plan, in view of the permitting obstacles encountered by energy infrastructure projects, the Commission will provide guidance on designating areas for grid and storage infrastructure necessary to integrate renewable energy into the electricity system in line with Article 15(e) of the Directive (EU) 2023/2413 amending Renewable Energy Directive (EU) 2018/2001. Under the Directive, Member States may adopt one or more plans to designate dedicated infrastructure areas for the development of grid and storage projects that are necessary to integrate renewable energy into the electricity system where such development is not expected to have a significant environmental impact, such an impact can be duly mitigated or, where not possible, compensated for. The aim of such areas shall be to support and complement the renewables acceleration areas. Under the conditions established in Article 15(e), infrastructure located in designated areas for grid and storage infrastructure can be exempted from certain environmental assessments.

- The aim of the guidance will be to support Member States in appropriately designating areas for grid and storage infrastructure necessary to integrate renewable energy into the electricity system in an effective and efficient manner leading to true acceleration of permitting for energy infrastructure. The guidance will take into account the fact that, in principle, due to its length and characteristics, energy infrastructure should be built everywhere where it is needed at an accelerated pace in view of the energy transition without such build out being limited to any specific areas. Nevertheless, the buildout of such infrastructure should limit as much as possible environmental impacts.

- This targeted consultation will be the main consultation activity. The target stakeholders are public authorities, system operators, industry associations and non-governmental organisations.

2. GIVING INPUT TO THE QUESTIONNAIRE – PRACTICALITIES

Eurelectric will submit an answer to this questionnaire. Certain questions ask for Member State practices therefore we ask our Members to give their national examples.

When giving an input to the questionnaire, please use **track changes** and include your **name, country and organisation** at each of your inputs as it cannot be tracked otherwise (word only shows guest user).

3. QUESTIONNAIRE

1. What do you think should be the **necessary steps** for the timely and effective set-up and implementation of dedicated grid areas as set out in the revised Renewable Energy Directive?

A variety of actions are necessary for a timely and effective set-up and implementation of dedicated grid areas. In areas where the renewable potential is available, renewables projects shall be connected to free capacities of existing power network. Available free capacities shall be transparent and publicly available. Network development plans (DNDPs) shall take into account renewable projects to connect renewables to the grid as soon as possible and avoid unnecessary network costs. Early involvement of DSOs is vital in this process to ensure that the expertise of DSOs regarding application of RES in specific areas and grid reinforcement needs are considered. The same applies to national, regional and local administrations to ensure that the most exact information is available about the potential influence on the environment and optimise the information sharing during the permitting and planning phase of the grid assets between the difference levels of governments and DSOs.

Dedicated grid areas shall take into account the location of existing and future renewable generation, the existing demand for electricity (to minimise network losses) and the existing network topology to avoid unnecessary network developments and costs. Dedicated grid areas should be developed at the same time as the mapping of the broader areas suitable for renewable capacity and the subsequent identification of renewable acceleration areas to extend the exemptions in the environmental assessments foreseen for renewable acceleration areas to grids and storage projects, because the principles and obligations set out in the Directive are comparable. As an example, the scopes of "Production Articles (15b, 15c, 16, 16a-16f)" and "Grid Article (15e)" might partly be overlapping. The production plant definition covers also "co-located energy storages" and "assets necessary for the connection to the grid" – these same assets can be interpreted being included also in Article 15e.
This streamlining of administrative tasks and synergising development of grid and renewable acceleration areas should not lead to additional bureaucracy but simplify the approval procedures and requirements.

The acceleration of grid connections in the energy sector should be additionally incentivised. One way to better align renewables build out and grid development is to incentivise projects at more suitable locations in the tendering (e.g. contracts for difference CfDs). For example, Italy is expected to adopt an auction mechanism from 2026, where projects are getting a bonus when selected in the CfD awarding process if located in different energy market zones, defined by the TSO.

Another necessary step is removing possible barriers to network investments. This includes streamlining public procurements and permitting of network assets, as well as financing. Financing is primarily done from tariffs, therefore we call for competitive regulatory returns, the removal of investment caps and incentives for anticipatory investment for DSOs. As an addition to these, as the EU framework is very limited on dedicated funds for distribution grids buildout apart from CEF smart grid category. We advocate for more EU and national funds for distribution grid projects in the existing programmes and within the next multiannual financial framework (MFF).

The timely interaction between DSOs, TSOs, NRAs, renewable investors, national authorities will be key, especially in network development plans.

2. What **type of guidance and support** would be necessary in your jurisdiction for the successful designation of dedicated grid areas that are most effective in integrating renewable energy and enable specific infrastructure projects to benefit from significant permitting acceleration?

Please find below our Members' examples on the need for guidance on the implementation of RED III.

Spain

In Spain, with transposition of art. 32 of Directive 944/2019 regarding the figure of the Distribution Network Development Plan (DNDP) still pending, any infrastructure planning for both DSOs and TSOs should be more closely aligned. A longer-term DSO planning with annual adjustments, not only from the generation point of view but also from the demand side, would be a better approach. In addition, the Commission Guidelines shall encourage the implementation of anticipatory investments to connect the growing demand of industry that wants to decarbonise in an ambitious way, and without introducing any additional risk to grid operators. There are different levels of responsibilities for environmental authorisations depending on the competent Administrations in Spain (local, regional, national). For this reason, we would like to ask the Commission to the guidance to help legislators to adequately implement the necessary changes to the existing regulation in this field e.g., to understand how to apply the requirements coming from Article 15e of RED III. For example:

- Establish a one-stop-shop through a centralized authority which handle all approvals related to projects already considered to be in suitable area, simplifying administrative burdens.
- Building capacity at public level, providing training and resources to local authorities, regulators, and permitting bodies to manage complex infrastructure projects efficiently. This could be also through specific social fund at EU level.
- the standardization at national or even European level of procedures related to permitting and data collection especially through digitalisation (e.g. standard templates).
- Assist public and private stakeholders in access to EU-level funding through recurring calls and transparent calendars.
- Establish a supervisory body that can support and monitor the activities of the permitting bodies, with the aim of ensuring compliance with the established procedures and timelines, potentially including a mechanism of rewards and penalties.

Ireland

In Ireland, a joint DSO and TSO (ESB Networks and EirGrid) proposal for the implementation of a Renewable Hubs pilot was approved by the NRA (CRU). Renewable Hubs are advance-build electricity infrastructure, developed in locations determined by analysis of existing network capacity and the known pipeline of renewable projects. The aim is to build once with a view to minimising the need for future uprates. This provides greater certainty for customers with regard to capacity and up-front costs which should lead to a lower project attrition rate. Customers connecting into the Renewable Hub are charged on the basis of their per-MVA share of the capacity for the relevant infrastructure.

Germany

The RED implementation guidelines should give support with best practices for interested member states. As the implementation of RED III is already underway in some member states (e.g. in Germany), it is imperative to avoid restricting the member states' scope for action through the guidelines and thus counteracting implementation measures that have already been undertaking or are in the process of being implemented. It is proposed that German states can decide individually on the designation of grid acceleration areas, though a unified approach at the federal level could be more effective. It is proposed to limit the simplification of the environmental impact assessments and exclude grid buildout projects of 110kV voltage level. The Directive does not specify a selection of privileged infrastructure areas according to energy industry necessity (e.g. existing grid connection requests from renewable energy plants). The Directive only requires that the projects privileged by the regulation serve the expansion of renewable energies and the transformation of the energy system as a whole. This is usually the case in the European Union with regard to the objective of a climate-neutral energy system.

Therefore, the following measures are crucial to the success of the RED-provisions (mostly on a national level):

- Timely transposition into national law, dependency of the adoption of the new Federal Requirements Planning Act ("Bundesbedarfsplangesetz").
- Transparency on the methodology of setting up the dedicated grid areas by the authorities towards the project promoters
- Eventually, various authorities will be involved at national level in the implementation of designating infrastructure areas. It is important that all authorities involved at national level align sufficiently well to ensure that project promoters can efficiently implement and prepare their projects

Poland

Technical local balancing regulatory sandboxes shall be considered.

3. What do you consider the most **appropriate criteria** for establishing the sites for effective and meaningful dedicated grid areas?

The implementation of a connection with the integration of renewable energies into the energy system is unnecessary, as the system itself inherently serves the integration of renewable energies in an electricity grid that is increasingly geared towards the use of renewable energies. Therefore, purely administratively driven area mapping and designation is not effective. The need for new grids can best be assessed by the TSOs and DSOs which have close cooperation with the developers of the new renewable production. The production plant developers make inquiries for the connection possibilities (the point, timetable, capacity etc.) and hence grid operators do have updated information of needs for grid development. Thus, we see, that the initiative for dedicated areas should strongly be addressed by the SOs rather than to the administration, and there is a need for political commitment to implement these areas. In addition, we suggest the following criteria to be taken into consideration:

- Geography and weather conditions affecting renewable generation capabilities of specific renewable energy sources such as wind, solar and hydro.
- Available and planned renewable energy potential

- Current and the projected amount of connection requests (in MW) for both demand with potential for flexible electricity demand response and generation in the area, giving priority to the existing RES projects
- Proximity to high energy demand exists or is expected to occur (e.g. large industrial plants, urban centres, data centres) to consume RES energy locally as much as possible, to increase efficiency in two ways: energy efficiency by avoiding network losses and cost efficiency by building only the necessary network.
- Environmental impact using the existing standards such as Natura 2000 and regional planning.
- Local impact on communities,
- Existing electricity network infrastructure to be taken into account to avoid unnecessary costs.
- Aligning with network operators when the grid area can be included in the DNDP if there is no available network yet,
- To bundle renewable projects together with each other and with flexibility providers to be more effective in network planning and connection.
- Alignment with National Energy and Climate Plans as well as network development plans.
- The pre-existence of other infrastructures (energy, roads, communications, etc...) in the vicinity may be seen as a facilitator for establishing these areas

4. What aspects should be taken into account in such designation as regards **environmental impacts**, broader spatial planning considerations, land use regulations, stakeholder engagement and public participation? What other areas do you consider relevant to be taken into consideration and how?

Commission Guidelines should foster Member States to be as ambitious and fast as possible transposing the overriding public interest concept applied also to electricity grids and infrastructures that integrate renewables into the electrical system, specially to distribution grids that integrate renewable self-consumption, so that the criteria established in the environmental directives for this type of projects are applied.

Among others, developing Renewable Energy Potential, Disaster Resilience and Risk Management, regional and local (municipality) development plans, local Municipality Building Regulations, engagement of local Communities, Regional or County based Building Regulation, Environmental Impact Assessment (EIA) Directive, Strategic Environmental Assessment, Natura 2000 Directive, Water Framework Directive, National Authorities of Environmental and Water Protection, local Forestiers, National Parks, nature and biodiversity authorities and entities, network plans (DNDP mostly), National Energy Regulatory Authority, Ministry of Environment, Ministry of Energy, Ministry of Industrial Development, National Infrastructure Authorities (road and rail network plans).

RED III includes some provisions that can, at worst, prevent the smooth and accelerated development and construction of grid infrastructure, such as:
- assessment according to Directive 2001/42/EC (the assessment of the effects of certain plans and programs on the environment)
- establishment of rules to be adopted in projects
- screening process of the project carried by competent authority

It is essential that these requirements do not overlap with e.g. spatial planning, for which conducting comprehensive studies are necessary. If these studies are required, there's no remarkable advantage of the exemption from environmental impact assessment allowed in RED

III. Therefore, the provision on the definition of protection/avoidance/mitigation measures should be designed in a way that the executing authorities of the Member States only define rules or criteria for measures at the level of site designation and, if necessary, offer the prospect of exemptions. In principle, no single measure should be prescribed, but all measures available for the species potentially affected should be considered, including new requirements and new measures that may be available by the time of approval. It must remain possible to rebut the necessity of conservation measures at the approval level, both through (breeding site) mapping and through the actual technical and legal assessment of the occurrence of the ban for the potentially affected animals.

5. What are possible additional tools and good practices that could facilitate effective and rapid designation of dedicated grid areas consistently across the EU?

It should be noted that the guidance document on transposing the RED III should focus on best practice-sharing and not establish supplementary rules in the guidance in order to not counteract ongoing or concluded transposition measures. As good practices, we suggest to take into account the following:

- Use ICT tools, including advanced digital platforms to map potential grid areas, incorporating real-time environmental data, land use, and grid capacity. These systems facilitate the visualization of potential impacts and help identify optimal grid locations. This could be executed by a neutral designated body at national level different from system operators in order to avoid bias effect.
- Environmental Sensitivity Mapping: Environmental sensitivity maps on a national level to help planners quickly identify regions that require special environmental consideration, such as Natura 2000 sites (https://natura2000.eea.europa.eu/).
- A good practice is applying models of created shared value (CSV) to establish benefit-sharing mechanisms tailored on the needs of the local communities. Such models contribute to local societal and economic development in areas interested by renewable and grid projects, thus increasing social acceptance.
- Taking cyber security and Network and Information Security (NIS) Directive in account, ensure necessary grid observability, digitalise network connection processes and calculations, transparency on available network capacities with the required granularity and the network connection log. An example of this are network Capacity Heatmaps for both generation and distribution, which are published biannually and provide an indication of available capacity for new demand and generation connections. It is part of a suite of tools that empowers customers to have a better understanding as to where to connect, enabling the easy identification of potential capacity in the vicinity of the customer site. It is a user-friendly and interactive map that shows the available network transformer capacity, in terms of how much demand or generation could be added into a substation without reinforcement.

6. Do you already have in your jurisdiction provisions regarding specific areas particularly suitable for energy infrastructure may they be the dedicated infrastructure areas or other zonal planning tools? Please explain how they were established and what has been taken into consideration.

Please find Eurelectric Members' examples below.

Spain

In general, in Spain there is no specific legal instrument to identify areas suitable for energy infrastructure. Nevertheless, at regional level, some autonomous communities have approved zoning tools for land use regarding the development of RES. Also, the Spanish Government, at national level, has approved a zoning instrument regarding the development of offshore RES. Some of these instruments include indirect references to the associated grid infrastructure development, although they do not constitute specific energy infrastructure dedicated areas. Recently, some steps have been taken regarding dedicated energy infrastructure areas (i.e. in Galicia a law project currently underway includes in its draft a specific provision regarding the future approval of energy infrastructure areas).
Moreover, local and regional authorities may occasionally include in their urban planning specifications certain plots intended for energy projects (for example, substations), but not such a broad concept exists (energy dedicated areas).

Germany

In Germany there are so called "Vorranggebiete" and "Vorbehaltsgebiete für Energieleitungen". These are specific categories in German Regional Planning Law (§7 par 3 Raumordnungsgesetz.). Establishing these areas follows the rules in §8 Raumordnungsgesetz in addition to State Regional Planning laws.

Austria

Sectoral zonal planning concept for wind and PV of Lower Austria:
https://www.raumordnung-noe.at/land/ueberoertliche-raumordnung/raumordnungsprogramme/raumordnungsprogramme-fuer-sachbereiche

7. How should zonal or spatial planning or mapping of the territory in your jurisdiction take into account space necessary for energy infrastructure development (e.g. maritime spatial planning)?

Please find Eurelectric Members' examples below.

Finland

In Finland the spatial planning is carried out at three levels: county level, municipal master plan level and in more detailed areal level. The energy infra is planned like other land uses, and in optimal situation planning can accommodate grids to existing land use. It's essential that spatial planning for infra is started when necessary.
There is legal opportunity that the site needed for infra is legally taken for that purpose even if the landowner opposes and/or there is no zoning in force. The prerequisite for this procedure is that infra is seen necessary for the general need. In these cases, the land owners will be paid full monetary compensation. This procedure is critical to ensure grid construction that typically needs long linear areas extending over the territory of several municipalities and landowners.

Spain
If a particular urban development requires certain energy infrastructure (for example, the DSO has explicitly answered to the developer's request in this regard), that urban project could include within its area the required space, but never the part of the project that goes beyond it.

Germany
See answer to question no 6.

8. How should other uses of land or maritime space already established for other purposes accommodate or co-exist with energy infrastructure development?

In practice, it is very difficult to use any other dedicated area (e.g. maritime, archeological) to project energy infrastructure. Given the proposal in Article 15e, there should be some guidance on how to make both situations compatible. We suggest to take the overriding public interest into account when building energy infrastructure.

- Flexible Zoning Policies: allow compatible uses within energy infrastructure zones. For example, agricultural lands can incorporate solar farms, allowing for continued farming beneath or around solar panels (agrivoltaics), which supports both food and energy production.
- Combination of different technologies: optimisation of PVs with wind generation and storages.
- Multi-Use Marine Areas: Compatible activities coexist with renewable infrastructure. Offshore wind farms, for instance, can coexist with aquaculture, recreational fishing, and even certain types of tourism, like eco-tours, if safety protocols are established.

9. In case of areas identified in Natura 2000 sites and in areas designated under national protection schemes for nature and biodiversity conservation, how have you determined that there are no proportionate alternatives for their deployment, taking into account the objectives of the site?

After complying with all relevant legislation, the relevant authorities, local regulations and regional governments will determine if a project can be implemented or not, introducing, where necessary, the principle of overriding public interest. Therefore, the Guidance should be more specific in the spirit of acceleration, i.e. it must not exclude any additional areas from the list. The standard for particularly sensitive areas within the meaning of Art. 15c (1) (ii) RED III must be set high, comparable with the areas that are already excluded (e.g. Natura 2000). Methods that have proven unsatisfactory in the species protection assessments of current permitting procedures must not be applied when designating acceleration areas. Rather, they should correspond to the current state of scientific knowledge. In the offshore sector, for example, data collection and evaluation covering the entire area and time period using modern technological possibilities (e.g. digital twin) provides a reliable data basis. This also helps to determine suitable conservation measures and to ensure and improve biodiversity in the long term. Please find Eurelectric Members' examples below.

Italy
According to Italian legislation, areas that make up the Natura 2000 areas are not strictly protected reserves where human activities are excluded. The Directive recognizes the value of all areas where the long-standing presence of humans and their traditional activities has allowed

the maintenance of a balance between human activities and nature. In these areas, the use of mitigation measures is strongly recommended.

Norway
Norway presents a unique situation, as the Natura 2000 framework does not apply to the country; however, they have established a similar system. Protected areas were designated after hydropower production had already started. As a result, many of the hydropower operations are located just outside protected areas. This does not mean that the framework was designed to avoid impacting valuable natural environments but rather reflects the approach taken by the authorities in the 1970s. There are cases in which companies are instructed by the authorities to upgrade protected areas. In such instances, there are typically no other "appropriate alternatives" to consider.

10. Have proportionate mitigation measures for the construction of energy infrastructure, linked to the dedicated infrastructure areas provided by Article 15(e) of the Renewable Energy Directive or otherwise, been established in your jurisdiction?

Please find Eurelectric Members' examples below.

Spain
In Spain there are no mitigation measures linked in particular to dedicated infrastructure areas. Mitigation measures are already proposed in the national regulation, but as general provisions for individual projects that have an environmental impact.

Germany
There are standard mitigation measures for the construction of energy infrastructure. Federal Network Agency (Bundesenetzagentur) and Federal Agency for Nature Conservation (Bundesamt für Naturschutz) have developed such standard measures at the occasion of the Emergency regulation EU 2022/2577. But no single measure should be prescribed, but all measures available for the species potentially affected should be considered, including new requirements and new measures that may be available by the time of approval. It must remain possible to rebut the necessity of conservation measures at the approval level, both through (breeding site) mapping and through the actual technical and legal assessment of the occurrence of the ban for the potentially affected animals.

11. Have any screening processes taken place in your jurisdiction that aim to identify if any project included in the dedicated infrastructure areas is highly likely to give rise to significant unforeseen adverse effects, in view of the environmental sensitivity of the geographical areas where it is located? Could you describe what such processes entailed and how they were set-up and what was assessed? Please describe the outcomes.

Please find Eurelectric Members' examples below.

Spain
There are no dedicated infrastructures areas in Spain yet. The general procedure for environmental authorisation (Law 21/2013 of 9 December) establishes a preliminary step in which projects subject to environmental assessment can request the Administration a first opinion ("documento de alcance") on their content, level of detail and specifications to be included in the ordinary environmental procedure. Based on that opinion, the developer may decide to proceed with the entire procedure or abandon it.

Germany
The challenge for the screening is, to align it as much as possible with the deadlines of the normal permitting procedure, so that it is not an additional burden, but fits into the general process. It should also be clear that environmental NGOs can only put forward existing data until the screening is over. After that point, they are excluded from putting forward new information, that would change the suggested routes and thus delay the planning significantly.

12. Have any appropriate compensatory measures been established in your jurisdiction following the **screening process**? How were they set up and what did they entail?

Please find Eurelectric Members' examples below.

Spain
Compensatory measures are usually established in the ordinary process and not in the screening process.

Finland
In Finland in the context of RED III no compensatory measures have been established yet. But in Finland we already have statutory procedure for the ecological compensation. This procedure could be voluntarily utilized to compensate nature values and get compensation certificated officially. The procedure is laid down in the Finnish Nature Conservation Act. This procedure would probably also be used in RED III context in future.

13. What **type of areas** do you consider should be prioritised for developing energy infrastructure?

Areas with high renewable energy potential and pressing capacity issues limiting urban expansion, restricting economic growth of certain areas. Also, industrial areas where electrification will be increased in the next years and other areas with existing infrastructures (corridors), especially the development of flexibility providers in those areas. Also important to consider the specific locations where energy is feeded from lower to higher voltage levels, which is an important element for organizing local balancing.

14. Are you using digital tools, maps or databases for identifying suitable areas for infrastructure buildout? Please explain and provide the relevant links.

Please find Eurelectric Members' examples below.

Spain
In Spain there are digital tools to facilitate the grid development and connection of RES although not directly built with the purpose of identifying suitable areas. National regulation requires DSOs and TSO to offer a digital platform that allows them to optimally submit any access and connection applications, and to ensure that the client can track the state of their application along the different stages. The platform's content and its functionalities are specifically regulated to homogenize them among DSOs and the Spanish TSO. Also, both the TSO and the DSO keep public databases with detailed information on the available capacity in each grid node for generation facilities and the volumes of awarded capacity and requested capacity under analysis. In coming months, similar information will also be available regarding demand facilities. Additionally, the MITERD (Spanish Ministry for Energy Transition) has launched an informative zoning tool with information of the expected environmental sensitivity regarding

the development of PV or wind power plants. The scope of the tool is limited and has been envisioned just as a guide for developers to have some useful preliminary information to identify potential areas of interest; therefore, it does not exempt the need to carry out a detailed environmental assessment for each project. Furthermore, public available tools as cartographic portals are used (e.g. https://sig.mapama.gob.es/geoportal/)

Poland
Where digital systems are in place that can be used to determine which power stations have reverse flows, it can also be determined that there is a need to build storage infrastructure at these locations.

Italy
Starting on December 2024, MASE (Italian Ministry of Environment and Energy Security) will launch the Permitting portal, a digital platform for managing energy-related permitting procedures for Battery Storage. This portal aims to streamline and digitize the submission and processing of requests, improving efficiency and transparency in line with national energy goals. Moreover, the Italian TSO Terna has developed the so called "TERRA" portal, which has the specific purpose of highlighting the development of storage and network assets in the different geographical areas.

Germany
GIS-Systems are used. The Planning authority Federal Network Agency (Bundesnetzagentur) uses the tool Pathfinder, as data basis they use ROPLAMO, (Bundestag-Drucksache 157/24, Draft Energy Law).

15. Have you conducted studies and research on the environmental impact of grids and storage in your jurisdiction, in particular for establishing areas for grid and storage infrastructure, but not only? Please provide links to such studies or research.

Please find Eurelectric Members' examples below.

Spain
Environmental studies are carried out when required by existing regulations. Up to now, no studies for areas have been carried out yet.

Germany
For every single project such studies have to be conducted. The documents of the relevant projects can be found on the website of the Federal Network Agency (Bundesnetzagentur) www.netzausbau.de

16. How has the public been involved in the designation of dedicated infrastructure areas or zonal planning for energy infrastructure in your jurisdiction? Is public participation/stakeholders' engagement an issue? Please describe your experience.

Generally, public consultations are organized. Please find below specific examples from our Members.

Spain
Information access is facilitated by publishing the environmental studies of the most important projects on the websites.

Finland

Spatial planning is carried out at three levels: county level, municipal master plan level and in more detailed areal level. The public is involved in several phases of each planning procedure, mainly be the public consultation. In addition, there are different possibilities to appeal to the court about zoning decisions.

17. Additional input you would like to submit

It would be beneficial to establish Dedicated Grid Areas for electrification of demand in a more holistic and cross sectoral way (i.e. industry, data centers, green ports, charging across TEN-T network), not focusing only on RES integration. Please find Eurelectric Member example below.

Spain

A proposal of defining specific infrastructure areas is:

(1) to develop in advance a kind of framework plan that includes a series of guidelines and compensatory measures to be met by projects based on those contained in the "documento de alcance" (first opinion) that already exist in the Spanish legislation (see Q11) and is elaborated by the competent environmental authority. Such first opinion document ("documento de alcance") can be requested by the promoter as a check list on environmental issues to be complied by the projects. In this case, this "first opinion document" may frame the relevant environmental features for a specific grid dedicated area.

(2) To include in the legislation that grids and storage infrastructure that comply with the specifics of the first opinion document are presumed to be of overriding public interest

(3) Replace the Environmental Impact Assessment process with a "responsible declaration" of alignment with the "first opinion document" for those projects that are included in the dedicated grid area, thus shortening the time periods for granting permits.

(4) To establish specific deadlines for permitting process for infrastructures, and clear requirement to comply with the by competent authorities, introducing the positive silence principle when deadlines expire.

(5) Designate these specific infrastructure areas in any area where renewables are developed

(6) The phasing out of curtailments is key to integrating renewables in the system, especially if they arise from global problems due to lack of demand. Therefore, areas for grid infrastructure should incorporate zones of forecasted huge increase in demand, anticipating the consumption needs so contributing to the reduction of curtailments and the integration of renewables.

Eurelectric pursues in all its activities the application of the following sustainable development values:

Economic Development

- Growth, added-value, efficiency

Environmental Leadership

- Commitment, innovation, pro-activeness

Social Responsibility

- Transparency, ethics, accountability

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