

Call for Evidence on the Grids Package

A Eurelectric consultation response paper

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.

Distribution & Market Facilitation Committee
WG Regulation & Network Customers
WG Sustainable Network Technology

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Eurelectric welcomes the European Commission's initiative to develop a European Grids Package aimed at strengthening the regulatory framework for system operators. We particularly appreciate the opportunity to contribute feedback during its development. As the representative voice of the European power sector, we strongly support efforts to enhance transparency in network planning, accelerate permitting procedures for electricity grid projects, and empower system operators to drive the energy transition.

We acknowledge the importance of improved coordination in grid planning between national and EU levels—particularly for cross-border projects. However, we wish to highlight several critical considerations that must inform any future legislative or non-legislative proposals:

1. Respect for the inherently local nature of distribution networks and therefore the necessity to have national assumptions for DNDPs that are clear in the 2050 net-zero target, but which must differ with the nationally chosen strategy on how to get there.
2. A balanced approach to leveraging flexibility services, while recognising the continued need for expansion and modernisation of distribution infrastructure.
3. Provision of clear mandates and practical tools for system operators to manage the growing volume of connection requests—before imposing procedural KPIs such as mandatory response times.

Distinction Between Transmission and Distribution System Operation

It is essential to recognise the fundamental distinction between transmission and distribution operations. Transmission systems operate at the macro level, transporting bulk electricity across long distances either from large-scale generation sites or to major load hubs. In contrast, distribution systems function at the micro level, ensuring reliable service to hundreds of millions of customers across diverse contexts—from rural villages to major industrial zones.

This difference poses a significant challenge in crafting a one-size-fits-all European regulatory framework for distribution system operators (DSOs). The Clean Energy Package and the recent market design reform were commendable steps in establishing guiding principles and a shared direction for ensuring equitable treatment of consumers. The forthcoming Grids Package should adopt a similarly pragmatic approach and try to react in a sensible way to the obvious challenges DSOs are facing throughout Europe.

Allow Adaptation for Local Realities

While harmonisation and standardisation may appear efficient at the EU level, they risk overlooking the substantial heterogeneity of distribution networks—not only between Member States but often within them. Imposing uniform practices based on EU-level objectives, without regard for local contexts, could lead to disproportionately high costs being passed on to consumers with minimal, if any, corresponding benefits.

Rather than dictating specific methodologies, EU policy should provide strong directional signals and a clear framework of principles that align national and European goals. This approach would allow DSOs the flexibility to implement solutions tailored to their unique operating environments, while still contributing to broader EU objectives.

Network Development Planning and the Role of DSOs

Network development plans already offer a rich source of information. While improvements in transparency are needed, we caution against premature reforms or the introduction of new parameters. In many Member States, only one iteration of the two-year network

development planning cycle has been completed, making it too early to determine whether European-level adjustments are necessary or whether national processes will evolve organically. We believe that the actions that were set out in the Grid Action Plan with regards to planning are well designed to meet the current innovation and coordination need.

Importantly, while cross-border planning justifies a more integrated approach at the transmission level, distribution planning remains fundamentally regional and local. Therefore, attempts to extend transnational frameworks to DSOs should be approached with caution.

Flexibility Services: A Complement, Not a Panacea

Flexibility services hold promise in enabling more efficient use of network assets. However, their benefits must be assessed alongside the costs associated with their implementation and integration and usage. Procuring and operationalising these services entails significant investment and capacity-building on the part of system operators.

Moreover, given the ageing state of Europe's distribution networks—30% of which are over 40 years old—and the structural shift from fossil fuels to electrification, modernisation and expansion remain critical. Flexibility should be seen as a complement to, not a substitute for, these fundamental infrastructure upgrades.

Mandates and Tools Before Metrics

System operators occupy a unique position within the European energy landscape. Unlike market-based entities, they are regulated monopolies, reliant on clear and consistent regulatory incentives to guide their actions. Before introducing performance metrics such as KPIs for connection times, it is vital to ensure operators have the mandates, resources, and legal certainty they need to respond to the exponential growth in connection requests. We urge the Commission to focus on enabling system operators through appropriate mandates from Member States and regulatory authorities. In particular, we advocate for strong guidance on non-discriminatory queue management practices, as well as recognition of technological investments that support faster and fairer connections. Imposing rigid benchmarks in a constrained regulatory environment may risk penalising good-faith efforts rather than incentivising progress.

We thank the Commission for this opportunity to contribute to such a crucial discussion. Eurelectric remains committed to engaging constructively on all aspects of the Grids Package. Our secretariat and network of experts are at your disposal to further elaborate on any of the points raised or to discuss related matters in greater detail.

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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