

Grids Package Recommendations

Overall, we welcome the Grids Package for recognising grids as central to Europe's energy and industrial strategy, for simplifying and accelerating permitting, for strengthening TSO–DSO cooperation, and for delivering a solid push to tackle connection queues. This direction strongly aligns with Eurelectric's long-standing efforts to place grids at the top of the European energy agenda, including through our [Grids for Speed study](#), which highlights the need to double annual investment in distribution grids to up to €67 billion.

This paper sets out recommendations identifying:

- a) provisions that have the potential to be game-changers and should be retained;
- b) provisions that require targeted amendments; and
- c) important elements that are currently missing.

If these changes are taken into account, the Grids Package can become a cornerstone of EU legislation for attracting investment and accelerating electrification.

What to keep

Permitting Directive

1. Overriding Public Interest for grids, RES, storage and charging infrastructure and exemptions from EIA (Art. 16f RED) & (8 ED).

Why: To accelerate the overall permitting time for projects to be developed.

2. The change of land-status for RES and restricting 'environmental no-go zones' (Art. 15c & 16c RED).

Why: To ensure the usage of new and existing high-potential sites.

3. Faster permitting for hybridisation (colocation) of all RES categories, energy storage and charging stations (Art. 16h, i, j RED).

Why: To optimize the usage of the RES as well as the power system as a whole and electrify transport.

TEN-E Regulation

4. Keep projects treated in the most rapid way with the highest national importance status (Art. 7 TEN-E).

Why: To ensure projects are not delayed due to slow permitting procedures.

5. Keep projects to be in overriding public interest and exempt from EIA (Art. 7 TEN-E)

Why: To accelerate the overall permitting time for projects to be developed.

What to change

Permitting Directive

1. Extend the Connection procedure timeline for below and over 100 kW for RES, charging stations and batteries and change the order of offering of an alternative grid connection point, timeline and FCA to whatever fits best for both the system operator and network user.

Why: To provide system operators with sufficient time to assess the request and make connection process more efficient.

How: Amending article 17 of RED and changing the maximum time allowed and order of offering.

2. Adapt the single point of contact and the national digital portal to reflect national and regional administrative structures and exclude grid connections from this procedure.

Why: To ensure interoperability with existing well-functioning portals and clarify that grid connections are no permits.

How: Amending: Article 8(4) of 2019/944 and Article 16 (3a) of RED and clarifying that the regional differences should be considered when setting up these streamlined procedures.

3. Change tacit approval for grid connections.

Why: To safeguard the system safety and security and limit the risk of rising speculative requests.

How: Amending article 17(4) of RED and consider the influence on the system safety and security.

4. Remove the regulatory streamlining for plug-in mini solar systems.

Why: It is already part of the existing electricity directive (article 15a(9)).

How: Amend Article 16d(4) and remove the text.

5. Benefit-sharing of RES should be on a voluntary basis based on national legislation without the role of an independent facilitator.

Why: To avoid duplication with existing national schemes that have a local nature, to prevent slowing down of project development and limit the additional cost burden on project developers.

How: Amending article 15d (3,4), including minimizing the role of the facilitator.

TEN-E Regulation

6. Include all distribution grid equipment within the scope of the new categories on the protection and resilience of critical network elements and digitalization categories currently designed for TSO level.

Why: To ensure enough investments flow to enhance the resilience and digitalization of distribution grid equipment.

How: Amending Annex II 1(e,f) TEN-E and widening the scope from critical network elements to equipment at all voltage levels.

7. Change the Smart Grids Category to also include low voltage levels to appropriately reflect the needs of DSOs.

Why: Smartening the grid is essential for all voltage levels of the grid.

How: Amending the Smart Grids Category in Annex II (1)(g)

What to add

1. Include a section in the EU Governance Regulation mandating Member States to assess investments necessary in grids to achieve electrification objectives.

Why: A supportive planning framework to invest in grid expansion, flexibility, non-wire solutions and innovations, in line with the “energy efficiency first” principle.

How: Adding a cross reference to the EU Governance Regulation.

2. Add an electrification indicator

Why: To give a clear investment signal across the energy supply chain, enable anticipatory investments in the grid and provide predictability for where the workforce is needed.

How: Adding a cross reference to Article 3 of the EU Governance Regulation with an indicative and carefully designed indicator.

3. Add hydro-pumped storage to the definition of stand-alone storage

Why: To ensure faster repowering processes also for hydro-pumped storage. It is an important lever to do more with existing grids.

How: Clarify the definition of Article 10(b) to confirm the inclusion hydro-pumped storage.

4. Add the change of land status prevention to grid projects

Why: To ensure grid connections to repowered RES are not hindered by a change of land status.

How: Amending Article 15e of RED with a similar text as for repowering RES.

5. Ensure permit granting for repowering disposals applied equally to PV, Wind and hydro.

Why: A uniform application of repowering provisions across wind, solar and hydropower installations is necessary to ensure equal treatment and regulatory consistency

How: amending article 16c of RED paragraph 4.