

Renewable Energy Strategy

IDENTIFICATION	
<p>1. Please enter your name and, where relevant, the name of the organisation you represent. Please include also an e-mail address for contact purposes for use only if we need clarification about your responses.</p> <p>-open reply-(optional)</p>	<p>European Partnership for Energy and the Environment (EPEE). Email: secretariat@epeeglobal.org</p>
<p>2. Are you responding to this questionnaire on behalf of /as:</p> <p>-single choice reply-(optional)</p>	<p>Industry</p>
<p>3. Please indicate your country -single choice reply-(optional)</p>	<p>Belgium</p>
<p>4. How would you prefer your contribution to be published on the Commission website, if at all?</p> <p>-single choice reply-(optional)</p>	<p>Under the name indicated (I consent to publication of all information in my contribution and I declare that none of it is under copyright restrictions that prevent publication)</p>
A. GENERAL POLICY APPROACH	
<p>A.1. Is there a role for new targets for renewable energy sources post-2020 assuming that any targets must be consistent with climate mitigation and energy efficiency policies and targets as is currently the case with the 20/20/20 targets in the Europe 2020 strategy?</p> <p>-multiple choices reply-(optional)</p>	<p>Yes, a mandatory target at EU level is appropriate</p>
<p>A.1.1. Please explain the reasons for your answer (such as the scope and contribution from GHG targets/ETS, the need to address other environmental, security of supply or technological development benefits) -open reply-(optional)</p> <p>Mandatory targets have proven to be more efficient than voluntary ones. The result is also an increase of innovation. Finally it helps to streamline and secure financial incentives.</p>	
<p>A.2. Are other policy elements necessary to promote renewable energy post-2020, such as:</p> <p>-multiple choices reply-(optional)</p>	<p>Facilitation policies (faster and easier permitting, improved access to the grid and further grid investments, availability of more sites for renewables, etc) - Other (please specify)</p>
B. FINANCIAL SUPPORT	
<p>B.1. Do you consider that financial support will continue to be necessary to support renewables post 2020 given their expected greater penetration? -single choice reply-(optional)</p>	<p>Yes</p>
<p>B.2. If renewable energy sources require support post-2020, how do you think this can</p>	<p>Making support schemes more market-oriented (please specify how)</p>

best be achieved with a view to achieving a cost-effective deployment? -multiple choices reply- (optional)	
B.3. Do you think it would be useful to develop common approaches as regards Member States' financial support for renewables? -single choice reply-(optional)	Yes, with EU-wide benchmark values for support level per technology
B.4. Should the structure of financial support be gradually aligned EU-wide? -single choice reply- (optional)	Yes (please explain how this could be achieved and which support structure you consider most suitable)
B.5. With regard to questions B.3. and B.4. please specify if you see a difference between the different sectors (electricity, heating and cooling, transport). -open reply-(optional)	
The investments in the Member States in certain technologies (e.g. wind power stations or photovoltaics) are focusing too much on electricity. There is a need for increased support of heating and cooling systems in comparison to electricity and transport.	
B.6. How do you see the relation between support schemes for renewable energy and the requirements of the internal electricity market for the period after 2020 against the background of a rising share of renewables? -multiple choices reply- (optional)	Member States need to open their support schemes to renewable generation from other Member States
B.7. Do national support schemes and differences between such schemes distort competition? -single choice reply-(optional)	Yes, some support schemes are more distorting than others (please specify which you consider most distorting)
C. ADMINISTRATIVE PROCEDURES	
C.1. Which of the following issues relating to administrative procedures, information and training do you consider acting as a serious impediment to further growth of renewables following Member States' implementation of the provisions of the Directive? -multiple choices reply- (optional)	Lack of commonly agreed technical specifications - Lack of information on support schemes or other - Lack of credible and certified training and qualification
C.1.1. Please provide explanations and specific examples where available -open reply-(optional)	
Lack of commonly agreed technical specifications: Contrary to the aim of the different pieces of legislation being applicable in one European market, Member States are starting to set up additional requirements, often on efficiency and quality. Examples are France and the UK: NF PAC (France) and MCS (UK) are by and large not compatible and require additional testing and administrative steps from manufactures to become eligible for support. The industry strongly supports a drive for better quality, but beliefs that identical requirements would not harm installation quality while at the same time making it easier to sell the same type of products across Europe. Training and certification is available for heat pumps in most EU countries. The biggest obstacle is, that these systems are often not used by the installers, as the consumer is not asking for quality labels/certificates. In turn, at least one reason for this situation is the lacking connection between government subsidies and labels/certificates.	
C.2. Which policy response to the problems identified above do you consider appropriate? -single choice reply-(optional)	Push for more standardisation and harmonisation on EU level or mutual recognition

D. GRID INTEGRATION OF ELECTRICITY FROM RENEWABLE ENERGY

SOURCES

D.1. Do you consider that any of the following national rules and framework conditions will still create obstacles to renewable energy production after 2020? -multiple choices reply-(optional)

Grid connection rules

D.1.1. Please specify which obstacles and the nature and degree of them for each -open reply-(optional)

Grid connection across national borders - or even within a Member State across regional borders - is mostly linked to highly bureaucratic procedures and therefore an obstacle for investments.

D.2. Which renewables-specific grid related rules do you consider necessary and proportionate in a post-2020 perspective? -multiple choices reply-(optional)

Obligation for network operator to develop network

D.2.1. Please explain why -open reply-(optional)

The development of the grid network would have a positive impact on the productivity, flexibility and efficiency of the energy sector.

D.3. With regard to system integration of wind and solar power, what measures do you consider most important to increase the flexibility reserve of the system: -multiple choices reply-(optional)

Increase availability of demand response (smart grids ...) -
Increased availability of storage

E. MARKET INTEGRATION

E.1. In which of the following ways could renewable energy be made responsive to market signals? -multiple choices reply-(optional)

E.2. How can it be ensured that market arrangements reward flexibility? -multiple choices reply-(optional)

Develop demand response to market signals (please specify, e.g. smart grids, smart meters, demand aggregation, interruptible demand)

E.3. In how far do you think today's market design needs to be adapted to provide an appropriate framework for renewables -single choice reply-(optional)

Electricity markets should evolve into energy services markets, earning revenues from more than just electricity

F. RENEWABLES IN HEATING AND COOLING

F.1. What do you consider to be the main barriers against a stronger uptake of renewable energy in the heating and cooling market beyond 2020? -multiple choices reply-(optional)

Lack of public support - Other (please specify)

F.2. What pathways do you consider to be the most promising for further increasing the share of renewable energy in heating and cooling beyond 2020? -multiple choices reply-(optional)

Other (please specify)

F.3. How do you see the interaction of promoting further use of renewable energy in heating and cooling and enhancing energy efficiency in this sector? -open reply-(optional)

Measures as Ecodesign rules and Ecolabel schemes are promoting the further use and production of renewables while also enhance energy efficiency. Those measures and rules should apply to all technologies equally in order to achieve the maximum level of environmental contribution.

G. RENEWABLES IN TRANSPORT

G.1. What do you consider to be the main barriers against a stronger uptake of renewable energy in transport? -multiple choices reply-(optional)

Lack of infrastructure - Other (please specify)

G.2. What sectors of transport do you consider to be the most promising for further increasing the share of renewable energy? -multiple choices reply-(optional)

Road for passengers - Road for goods - Rail - Water - Air

G.2.1. Please explain your answer -open reply-(optional)

Energy policy making should look at all these sectors equally, as they all have a relevant promising potential.

H. SUSTAINABILITY

H.1. Do you think that additional sustainability criteria are necessary in the post 2020 period? -multiple choices reply-(optional)

Yes, sustainability criteria should apply to both all biomass and fossil fuels

H.1.1. Please explain -open reply-(optional)

Again, all technologies need to be handled in the same way. The criteria should therefore apply to all biomass and fossil fuels.

I. REGIONAL AND INTERNATIONAL DIMENSIONS

I.1. Do you consider current rules for cooperation between Member States sufficient to fulfil their purpose, i.e. realisation of cost-efficient renewable potential in the EU? -single choice reply-(optional)

No (please specify how they should be amended or which elements added)

I.2. Do you think the EU should further facilitate cooperation with third countries when it comes to the development of the potential for renewable energy? -single choice reply-(optional)

Yes, cooperation with third countries should be further promoted (please specify how and with whom, i.e. only neighbouring countries or more widely)

I.3. Should investments in electricity networks in some Member States (i.e. Spain, Greece, Italy) be prioritized for this purpose? -single choice reply-(optional)

Yes (explain in which way and to which degree)

I.4. Which measures do you consider appropriate and necessary in order to foster cooperation with third countries in this area? -single choice reply-(optional)

Agreements between the EU and third countries

I.5. In its Communication on security of supply and energy cooperation – "The EU Energy Policy: Engaging with Partners beyond our Borders", the European Commission proposes to promote cooperation on renewable energy projects with the Southern Mediterranean countries and to gradually build a renewed EU-Mediterranean energy partnership focus on electricity and renewable energy. How do you consider this should relate with the EU internal renewables policy? What should be the priorities? -open reply-(optional)

Priority should be given to the EU internal renewables policy in order to boost investments and economical benefits and take a global

lead in new technologies. However in terms of new markets and exporting, these partnerships have to be build up or intensified - obviously this has to be in line with all EU regulations.

I.6. The possibility to explore regional cooperation and a coordinated, more strategic approach to grid connection for the rapidly growing volume of offshore wind generation in the North Sea is currently being explored in the framework of the North Sea Countries Offshore Grid Initiative (NSCOGI). Do you think such cooperation should be further fostered? What benefits do you think could arise from it? Do you consider that this experience could be generalised and applied elsewhere? -open reply-(optional)

Especially regarding grid connection such cooperations are vital and should be fostered. In case of success this example can be generalised and applied elsewhere.

J. TECHNOLOGY DEVELOPMENT

J.1. For a first set of renewable technologies, namely wind, solar, bio-energy, the SET Plan aims at a cost-competitive market roll out of renewable energy by 2020. It also aims at enabling integration of renewable energy into the electricity grid and smart cities and communities. In your view, what would be the remaining key challenges of these technologies to be addressed by research and innovation in view of the 2050 objectives?

-multiple choices reply-(optional)

Technology performance and cost-competitiveness

J.2. Which additional measures and/or instruments should be developed to address these technologies and their remaining challenges and to ensure that the EU innovation fabric is geared to supporting the significant deployment up to 2050? -open reply-(optional)

Public awareness should be raised in regard to all kinds of technologies, financial incentives have to support innovation efforts and the EU rules have to be harmonized and the legislation has to cross-comply.

J.3. In your point of view, which technologies other than those covered by the current industrial initiatives should be given priority in the post-2020 perspective? Please justify with reference to the criteria mentioned above, i.e. large-scale availability and willingness of industry to engage in public private partnerships?

-open reply-(optional)

A technology neutral approach is the most promising way for the European energy sector.

J.4. How successful do you consider the existing measures have been and which have been the main drawbacks? -single choice reply-

(optional)

Successful but some drawbacks (please specify which)

J.5. Do you consider that assistance in technology development should be linked to a certain result to be achieved by a certain deadline?

-open reply-(optional)

This can't be answered in a generalised way. It always depends on the situation and the case. For the case of basic R&D, this seems not plausible, for the case of research into technology deployment, as supported under the IEE program and the future horizon 2020, targets and deadlines should be set.