



EUROPEAN COMMISSION PUBLIC CONSULTATION ON THE PREPARATION OF A NEW RENEWABLE ENERGY DIRECTIVE FOR THE PERIOD AFTER 2020

Answer Paper

By the ROMANIAN ENERGY CENTER (CRE)

February 2016

This document has been prepared by the members of the professional association **Romanian Energy Center (CRE)**, through the main state owned organizations: **COMPLEXUL ENERGETIC OLTENIA, CONPET S.A, ROMGAZ, TRANSELECTRICA, TRANSGAZ**, together with private companies active in the electricity, coal, oil and gas sectors in Romania: **ADREM INVEST, CEZ Group România, ELECTRICA S.A., E.ON România, ECRO, ENERGObit, EXIMPROD, Institutul de Studii și Proiectări Energetice (ISPE), NOVA INDUSTRIAL, NRGSG Technik, RETRASIB, TRACTEBEL ENGINEERING, ȚUCA ZBÂRCEA & ASOCIAȚII** together with the support of the **CRE** legal department represented by **CIURTIN & ASOCIAȚII**.



The Romanian Energy Center is a professional organization for Romanian energy companies.

It is managed and financed by its member companies, mainly the electricity, coal, oil and gas companies at the present, and works to secure for them the freest and most favorable conditions for competition and progress in order to ensure development, growth and well-being in Romania.

EXECUTIVE SUMMARY

RED has been generally successful in achieving the envisaged objectives regarding energy and climate change within the 2020 horizon. However, its policies and measures should be continued and expanded towards 2030 and even 2050. One of the major aims of the policies beyond 2020 should be the harmonization and gradual alignment of the support schemes in order to allow cross-border participation in the support schemes.

The renewal energy potential is still under-exploited, particularly in certain areas and as regards certain technologies. This potential should be fully put into use by measures such as promoting the integration of renewable energy in the local infrastructure and public services to a larger extent, supporting local authorities in taking the initiative to develop renewable energy projects, facilitating cooperation between various actors, as well as facilitating access to financing. Equally, national authorities should be encouraged in taking more determined measures towards decarbonizing the heating and cooling sector, such as by including renewable heating and cooling obligation, promotion of renewable energy in case of upgrades to municipal infrastructure and establishment of clear criteria and benchmarks for supporting district heating and cooling.

While from a Romanian perspective, administrative burden and the cost of compliance with the RED for national authorities are not excessive either for national or local authorities, significant other steps can be taken in order to ensure a more effective promotion and support of renewable energy policies. These would include: (i) introducing full balancing responsibilities; (ii) further alleviating infrastructure barriers in particular by transparent and foreseeable grid development; and (iii) reducing administrative costs by effective online permitting procedures and more freedom granted to local authorities in deciding whether to initiate renewable energy projects within their boundaries.

The view is that RED has had a lesser success in addressing the EU transport policy objectives, given that the support schemes do not include infrastructure developers, among others, and that the technologies are not mature enough.

Part 1: Information about the respondent

*Are you responding to this questionnaire on behalf of/as:

- ☐ Individual
- ☒ **Organization**
- ☐ Company
- ☐ Public Authority
- ☐ Other

*Name of the company/organization

Romanian Energy Center - CRE

*Please describe briefly the activities of your company/organization and the interests you represent

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*Please enter your email address

office@crenerg.org or irina.nita@crenerg.org

*Are you registered with the EC transparency register?

☒ Yes

☐ No

*Which countries are you most active in?

- ☐ Austria
- ☐ Belgium
- ☐ Bulgaria
- ☐ Croatia
- ☐ Cyprus
- ☐ Czech Republic
- ☐ Denmark
- ☐ Estonia
- ☐ Finland
- ☐ France
- ☐ Germany
- ☐ Greece
- ☐ Hungary
- ☐ Ireland
- ☐ Italy
- ☐ Latvia
- ☐ Lithuania
- ☐ Luxembourg
- ☐ Malta
- ☐ Netherlands
- ☐ Poland
- ☐ Portugal
- ☒ Romania
- ☐ Slovakia
- ☐ Slovenia
- ☐ Spain

- ☐ Sweden
- ☐ United Kingdom
- ☐ Other

* Please specify 'Other':

* Can we publish your answers on the Commission website?

☒ YES - under my name (I consent to all of my answers/personal data being published under my name and I declare that none of the information I have provided is subject to copyright restrictions).

☐ YES - anonymously (I consent to all of my answers/personal data being published anonymously and I declare that none of the information I have provided is subject to copyright restrictions).

☐ NO - please keep my answers confidential (my answers/personal data will not be published, but will be used internally within the Commission)

* please state briefly your reasons

Part 2: General approach

1. To what extent has the RED been successful in helping to achieve the EU energy and climate change objectives?

- ☐ Very successful
☒ **Successful**
☐ Not very successful
☐ Not successful
☐ No opinion

To what extent did implementation measures for the RED as well as external factors (technological development, financial crisis, security of supply concerns and related market interventions) affect the effectiveness and efficiency of achieving the objectives? Please identify and ideally also quantify the direct and indirect costs and benefits such as macroeconomic effects, competitiveness effects, innovation, cost and cost reductions, environmental and health effects of the Renewable Energy Directive.

3600 character(s) maximum

Members of the Romanian Energy Center organization consider the RED successful in terms of clean energy, although at a different cost to the price of electricity and particular on its impact on industry and vulnerable customers.

2. How should stability, transparency and predictability for investors be ensured with a view to achieving the at least 27% renewable energy target at EU level? Please indicate the importance of the following elements:

	Very important	Important	Not very important	Not important	No opinion
Forward looking strategic planning of RES development is required by EU legislation	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Best practice is derived from the implementation of the existing Renewable Energy Directive	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Regional consultations on renewable energy policy and measures are required	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Member States consult on and adopt renewable energy strategies that serve as the agreed reference for national renewable energy policies and projects	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The Commission provides guidance on national renewable energy strategies	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

Any other view or ideas? Please specify. What are the lessons from the RED (mandatory national targets, national plans, progress reports etc.)?

3600 character(s) maximum

CRE considers that Member States must have the freedom to decide on their own speed of yearly progress, on the ways and means to achieve this progress; the progress must include all clean energy resources (e.g. all hydro resources).

3. Please rate the importance of the following elements being included in Member States' national energy and climate plans with respect to renewable energy in ensuring that the plans contribute to reaching the objectives of at least 27% in 2030.

	Very important	Important	Not very important	Not important	No opinion
Long term priorities and visions for decarbonization and renewable energy up to 2050	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
In relation to national/regional natural resources, specific technology relevant trajectories for renewable energy up to 2030	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Overview of policies and measures in place and planned new ones	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Overview of renewable energy trajectories and policies to 2050 to ensure that 2030 policies lie on the path to 2050 objectives	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

Qualitative analysis	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Trajectories for electricity demand including both installed capacity (GW) and produced energy (TWh)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Measures to be taken for increasing the flexibility of the energy system with regard to renewable energy production	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Plans for achieving electricity market coupling and integration, regional measures for balancing and reserves and how system adequacy is calculated in the context of renewable energy	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

4. What should be the geographical scope of support schemes, if and when needed, in order to drive the achievement of the 2030 target in a cost-effective way?

- ☐ Harmonized EU-wide level support schemes
- ☐ Regional level support schemes (group of Member States with joint support scheme)
- ☒ National support schemes fully or partially open to renewable energy producers in other Member States
- ☒ Gradual alignment of national support schemes through common EU rules
- ☒ National level support schemes that are only open to national renewable energy producers

5. If EU-level harmonized /regional support schemes or other types of financial support to renewable energy projects would be introduced:

- What hinders the introduction at the EU wide and/or regional scale?
- How could such mechanism be activated and implemented? What would be their scope (what type of projects/technologies/support mechanisms could be covered?)
- Who would finance them?
- How could the costs of such measures be shared in a fair and equitable way?

3600 character(s) maximum

Yes.

CRE considers that it is necessary that the support mechanism be harmonized at EU level and also regional support schemes must be introduced; corrections must follow based on the field realities.

6. The current Renewable Energy Directive gives Member States the possibility to enter into various cooperation mechanisms (statistical transfers, joint projects and/or joint support schemes). Please expand on the possible new legislative and non-legislative measures that could be introduced to foster the development of cooperation mechanisms in the period beyond 2020.

3600 character(s) maximum

From CRE's point of view, although the objective is global, it is the interest of each Member State to enter into various cooperation mechanisms, the current RED still has potential to be captured, therefore, we should submit to the current directive.

7. The use of cooperation mechanisms has been limited to date. Which of the below factors do you consider important in explaining the limited recourse by Member States to cooperation mechanisms so far?

	Very important	Important	Not very important	Not important	No opinion
Unclear legal provisions	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Administrative complexities	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Lack of cost-effectiveness/ uncertain benefit for individual Member States	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Government driven process, not market driven	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Member States reluctant to see their taxpayers/ consumers' money used for investments outside their country	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
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Other? Please explain.

3600 character(s) maximum

CRE considers that the clear legal provisions are very important in explaining the recourse by Member States to cooperation mechanisms. The reluctance of the Member States in seeing their taxpayers/ consumers' money used for investments outside their country is also an issue, in the end both legal provisions and cost sustainability count.

8. How could renewable electricity producers be fully or partially eligible for support in another Member State? Which elements would you include in a possible concrete framework for cross-border participation in support schemes? Any other consideration? Please explain.

3600 character(s) maximum

From CRE's point of view, EU could collect the proposal for the possible concrete framework for cross-border participation in support schemes and should provide the guidelines for implementation in accordance to the Member States national guidelines. They must share fairly the effort. In Romania for example, wind producers receive their green certificates but part of it goes to export. Romanian customers should not subsidize customers from other countries.

9. Please assess what kind of complementary EU measures would be most important to ensure that the EU and its Member States collectively achieve the binding at least 27% EU renewable energy target by 2030:

	Very important	Important	Not very important	Not important	No opinion
EU-level incentives such as EU-level or regional auctioning of renewable energy capacities	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
EU-level requirements on market players to include a certain share of	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

renewables in production, supply or consumption					
EU-level financial support (e.g. a guarantee fund in support of renewable projects)	X	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
EU-level support to research, innovation and industrialization of novel renewable energy technologies	X	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Enhanced EU level regulatory measures	<input type="radio"/>	X	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Any other ideas or comments, please explain.

3600 character(s) maximum

Members of CRE consider that the driver in ensuring the achievement of the binding at least 27% EU renewable energy target by 2030 is the EU level financial support. At the EU level there isn't a single regulator body.

10. The Energy Union Framework Strategy sets the ambition of making the European Union the global "number one in renewables". What legislative and non-legislative measures could be introduced to make/strengthen the EU as the number one in renewables? Has the RED been effective and efficient in improving renewable energy industrial development and EU competitiveness in this sector?

3600 character(s) maximum

From CRE's point of view, the RED implementation is not enough for achieving the strategic objectives of making EU – the global "number one in renewables":

- Legislation – up to a limit – it is not a solution in any circumstances
- New technologies to make it a sustainable business – in general terms, employment can increase

Part 3: Empowering consumers

11. How would you rate the importance of the following barriers for consumers to produce and self-consume their own renewable energy?

	Very Important barrier	Important barrier	Not very important barrier	Not Important barrier	No opinion
Self-consumption or storage of renewable electricity produced onsite is forbidden	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Surplus electricity that is not self-consumed onsite cannot be sold to the grid	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Surplus electricity that is not self-consumed onsite is not valued fairly	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Appliances or enabler for thermal and electrical storage onsite are too expensive	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Complex and/or lengthy administrative procedures, particularly penalizing small self-consumption systems	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Lack of smart grids and smart metering systems at the consumer's premises	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The design of local network tariffs	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
The design of electricity tariffs	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

12. In general, do you think that renewable energy potential at local level is:

- ☐ Highly under-exploited
- ☒ Under-exploited
- ☐ Efficiently / fully exploited
- ☐ Over-exploited (i.e. beyond cost-effectiveness)
- ☐ No opinion

13. How would you rate the importance of the following barriers that may be specifically hampering the further deployment of renewable energy projects at the local level (municipalities and energy cooperatives):

	Very Important barrier	Important barrier	Not very Important barrier	Not Important barrier	No opinion
Lack of support from Member State authorities	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Lack of administrative capacity and/or expertise/ knowledge/information at the local level	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Lack of energy strategy and planning at local level	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Lack of eligible land for projects and private property conflicts	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Difficulties in clustering projects to reach a critical mass at local level	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Lack of targeted financial resources (including support schemes)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Negative public perception	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

14. Please rate the appropriateness of stronger EU rules in the following areas to remove barriers that may be specifically hampering the further deployment of renewable energy projects at the local level:

	Very appropriate	Appropriate	Not very appropriate	Not appropriate	No opinion
Promoting the integration of renewable energy in local infrastructure and public services	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Supporting local authorities in preparing strategies and plans for the promotion of renewable energy	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Facilitating cooperation between relevant actors at the local or municipal level	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Facilitating access to targeted financing	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
EU-wide right to generate, self-consume and store renewable electricity	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Measures to ensure that surplus self-generated electricity is fairly valued	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Harmonized principles for network tariffs that promote consumers' flexibility and minimize system costs	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

15. Should the current system for providing consumers with information on the sources of electricity that they consume be further developed and improved?

If not, why? If yes, how?

Should the current Guarantees of Origin (GO) system be made the mandatory form of information disclosure to consumers?

Should other information, such as e.g. CO2 emissions be included?

Should it be extended to the whole energy system and include also non-renewable sources? Other ideas?

To what extent has the current GO system been successful in providing consumers with information on the sources of electricity that they consume?

3600 character(s) maximum

Members of CRE consider that the current system for providing consumers with information on the sources of electricity that they consume has to be based on:

- Guarantees of Origin (GO) – which must be mandatory
- Minimum bureaucracy for CO2 emissions

Part 4: Decarbonizing the heating and cooling sector

16. Please rate the importance of the following barriers in hampering the deployment of renewable heating and cooling in the EU:

	Very Important barrier	Important barrier	Not very Important barrier	Not Important barrier	No opinion
Real or perceived incoherence in existing EU policies (such as RED, EED and EPBD)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Lack of administrative capacity and/or expertise/ knowledge/information at the national and local level	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Lack of energy strategy and planning at the national and local level	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Lack of physical space to develop renewable heating and cooling solutions	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Lack of requirements in building codes and other national or local legislation and regulation to increase the share of energy from renewable sources in the building sector	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Heating and cooling equipment installers lack sufficient knowledge or information to offer renewable energy alternatives when asked to replace fossil fuel heating and cooling equipment	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Lack of targeted financial resources and financing instruments	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Lack of definition and recognition of renewable cooling	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Lack of electricity market design supporting demand response, decentralized energy and self-consumption and thermal storage in buildings and district systems	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Lack of mapping tools to identify the resources potential at regional scale with local renewable energy	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Lack of tools and information to compare the lifecycle costs of the various alternative heating and cooling alternatives	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Negative public perception	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
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17. Please rate the most effective means of addressing these barriers and advancing the decarbonization of EU heating and cooling supply:

	Very effective	Effective	Not very effective	Not effective	No opinion
Renewable heating and cooling obligation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Requirement for energy suppliers and/or distributors to inform consumers of the costs of heating and cooling and to offer renewable heating and cooling solutions	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Requirement that all urban and municipal infrastructure upgrades (energy infrastructures, and other relevant infrastructure, such as sewage water, water and waste chains) make it possible and promote the distribution and use of renewable energy for heating and cooling and hot water generation	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Measures supporting best practices in urban planning, heat planning, energy master planning, and project development	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Criteria and benchmarks for promoting district heating and cooling taking into consideration the local and regional conditions	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Nearly zero-energy building (NZEB) standards to include a mandatory minimum use of renewable energy	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Including systematically renewable energy production in buildings' energy performance certificates	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The promotion of green public procurement requirements for renewable heating & cooling in public buildings	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Heating and cooling equipment installers should present renewable energy alternatives when asked to replace fossil fuel heating and cooling equipment	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Develop best practices for enterprises, including SMEs, to integrate renewable heating and cooling into their supply chains and operations	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Requirement to consider renewable energy alternatives in subnational, national, regional or EU security of supply risk preparedness plans and emergency procedures	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Targeted financial measures	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Part 5: Adapting the market design and removing barriers

18. In your view, which specific evolutions of the market rules would facilitate the integration of renewables into the market and allow for the creation of a level playing field across generation technologies? Please indicate the importance of the following elements to facilitate renewable integration:

	Very important	Important	Not very important	Not important	No opinion
A fully harmonized gate closure time for intraday throughout the EU	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Shorter trading intervals (e.g. 15 min)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Lower thresholds for bid sizes	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Risk hedging products to hedge renewable energy volatility	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Cross border capacity allocation for short-term markets (i.e., some capacity being reserved for intraday and balancing)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Introduction of longer-term transmission rights (> 3 years)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Regulatory measures to enable thermal, electrical and chemical storage	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Introduction of time-of-use retail Prices	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Enshrine the right of consumers to participate in the market through demand response	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
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Any other view or ideas? Please specify.

3600 character(s) maximum

CRE considers that in relation to the right of consumers to participate in the market through demand response, such solution may be applied in the Romanian market only in relation to large consumers.

19. Currently, some exceptions from the standard balancing responsibilities of generators exist for energy from renewable sources. In view of increasingly mature renewable generation technologies and a growing role of short-term markets, is time ready to in principle make all generation technologies subject to full balancing responsibilities?

☒ Yes, in principle everyone should have full balancing responsibilities

☐ No, we still need exemptions

Please specify: If exemptions remain necessary, please specify if and in which case and why exemptions would still remain necessary (e.g. small renewable producers, non-mature technologies)?

3600 character(s) maximum

Not applicable in Romania.

20. Please assess the importance of stronger EU rules in the following areas to remove grid regulation and infrastructure barriers for renewable electricity deployment:

	Very important	Important	Not very important	Not important	No opinion
Treatment of curtailment, including compensation for curtailment	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Transparent and foreseeable grid development, taking into account renewable development and	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

integrating both TSO and DSO level and smart technologies					
Predictable transparent and non-discriminatory connection procedure	X	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Obligation/priority of connection for renewables	<input type="radio"/>	X	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Cost of grid access, including cost structure	<input type="radio"/>	X	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Legal position of renewable energy developers to challenge grid access decisions by TSOs	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	X	<input type="radio"/>
Transparency on local grid congestion and/or market-based incentives to invest in uncongested areas	<input type="radio"/>	X	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Comments and other ideas, including whether there are any consideration concerning gas from renewable energy sources, for instance expansion of gas infrastructure, publication of technical rules, please explain.

3600 character(s) maximum

CRE deems of particular importance for the EU directive to define the elements which are to be included in the cost of grid access, out of which the cost for the strengthening of the system should be one of the key elements.

21. Which obstacles, if any, would you see for the dispatching of energy from all generation sources including renewables on the basis of merit order principles? Should there be any exemptions in some specific cases?

☐ Yes, exemptions are necessary

X No, merit order is sufficient

22. Please assess the importance of stronger EU rules in the following areas to remove administrative barriers to renewable energy deployment:

	Very important	Important	Not very important	Not important	No opinion
Creation of a one stop shop at national level to allow for more streamlined permitting procedures	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Online application for permits	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
A defined maximum time-limit for permitting procedures, and effective consequences if deadline is missed	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Harmonization of national permitting procedures	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Special rules for facilitating small-scale project permitting, including simple notification	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Pre-identified geographical areas for renewable energy projects or other measures to integrate renewable energy in spatial and environmental planning	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Any other views or ideas? To what extent has the RED been successful in reducing unnecessary administrative barriers for renewable energy projects in the Member States? Please specify.

3600 character(s) maximum

CRE's members consider that in Romania, RED has been implemented in a satisfactory manner, as concerns the administrative procedures required to be followed for the development of renewable energy projects. However, since the administrative process involves several actors (central energy regulatory authority, local public authorities, TSO/DSOs, etc.), such process may be time consuming and sometimes difficult to be managed. Therefore, streamlining and simplifying the procedure, establishing clear deadlines and creating the possibility for on-line submission of documents should be objectives of the new/revised RED. Also, national authorities should be allowed the freedom to encourage renewable energy project in particular geographical areas, based on objective criteria such as energy deficit or grid requirements.

23. Please identify precise challenges with regard to grid regulation and infrastructure barriers in EU

Member States that you are aware of.

3600 character(s) maximum

CRE considers that in Romania, the infrastructure barrier is related to the insufficient development of the grid (e.g. Dobrogea region), further to the development of numerous renewable energy projects in the respective area.

24. How would you rate the administrative burden and cost of compliance with the RED for national, regional and local authorities?

	Very important	Important	Not very important	Not important	No opinion
Administrative burden	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Cost of compliance	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please explain. How could the administrative burden and cost of compliance be reduced in the period after 2020?

3600 character(s) maximum

As indicated, in Romania, the administrative burden and the cost of compliance with RED are not excessive either for national or local authorities. These could be further reduced after 2020 by providing more guidance including best practices from the EU and standard methodologies and plans of action where possible (such as for reporting obligations, etc.).

25. Please rate the importance of stronger EU rules in the following areas to remove barriers relating to renewable energy training and certification:

	Very important	Important	Not very important	Not important	No opinion
Incentives for installers to participate in certification/qualification schemes	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Increased control and quality assurance from public authorities	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Understanding of the benefits and potential of renewable technologies by installers	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Mutual recognition of certificates between different Member States	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Comments, other ideas, please explain. To what extent has the RED been successful in reducing unnecessary training and certification barriers in the Member States?

3600 character(s) maximum

CRE is of the view that RED had a limited success in this respect.

26. How can public acceptance towards renewable energy projects and related grid development be improved?

3600 character(s) maximum

CRE considers that the sole measure proposed consists of information campaigns, in order to increase awareness on the environmental benefits of the renewable energy.

Part 6: Increase the renewable energy use in the transport sector

28. To what extent has the RED been successful in addressing the following EU transport policy objectives?

	Very successful	Successful	Not very successful	Not successful	No opinion
Contribute towards the EU's decarbonization objectives	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Reduce dependency on oil imports	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Increase diversification of transport fuels	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Increase energy recovery from wastes	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Reduce air pollution, particularly in urban areas	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Strengthen the EU industry and economy competitiveness	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

Stimulate development and growth of innovative technologies	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Reduce production costs of renewable fuels by lowering the level of investment risk	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Facilitate fuel cost reduction by integration of the EU market for renewable fuels	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

Any other view or ideas? Please specify

3600 character(s) maximum

Members of CRE consider that these directives must be translated into national policies and subsidies should not only be done to the client but should also be addressed to infrastructure developers and manufacturers of components for the production or supply of green energy.

29. Please name the most important barriers hampering the development of sustainable renewable fuels and renewable electricity use in transport?

Please explain, and quantify your replies to the extent possible.

3600 character(s) maximum

From CRE's point of view the main barriers are:

- Still high cost of vehicles that use renewable energy (electric accumulators still very expensive)
- High costs for equipment producing and supplying renewable energy (ex. Fast charger stations for electric vehicles)
- Relatively low vehicle autonomy (120-150 km)
- Insufficient development of supply networks

30. Please rate the most effective means of promoting the consumption of sustainable renewable fuels in the EU transport sector and increasing the uptake of electric vehicles:

	Very effective	Effective	Not very effective	Not effective	No opinion
Increased use of certain market players' obligations at Member State level	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
More harmonized promotion measures at Member States level	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The introduction of certain market players' obligations at the EU level	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Targeted financial support for deployment of innovative low-carbon technologies (in particular to the heavy duty transport and aviation industry)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Increased access to energy system services (such as balancing and voltage and frequency support when using electric vehicles)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Increased access to alternative fuel infrastructure (such as electric vehicle charging points)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Any other view or ideas? Please specify.

3600 character(s) maximum

In CRE's opinion, developing a network of charging for electric vehicles should be recognized as a prudent investment in the area covered by DSO and can be included in the list of fixed assets for depreciation.

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The Romanian Energy Center is a professional organization for Romanian energy companies.

It is managed and financed by its member companies, mainly the electricity, coal, oil and gas companies at the present, and

works to secure for them the freest and most favorable conditions for competition and progress in order to

ensure development, growth and well-being in Romania.

