

4. april 2016

Nr.	Spørgsmål	Svar
1	SE SEPARAT DOKUMENT	
2	Are you aware of overlaps or inconsistencies among the existing planning obligations in the same or different areas of the energy and climate acquis? Please provide examples.	No answer.
3a	Which of the current planning obligations could in your opinion be streamlined[*] into one integrated plan and why?	With regard to energy efficiency the planning obligations of the National Energy Efficiency Action Plans and Annual Reports (NEEAP's) could be integrated into one consolidated national plan on all planning obligations for energy. It is, however, hard to estimate the efficiency gains from this. If such a consolidated report will contain the same requirements as the NEEAPS' requirements, the efficiency gains from this might be smaller.
3b	Are there any planning obligations that should be kept separate from the integrated plan?	In general, all planning relevant for the Energy Union should be integrated in order to minimize administrative costs and integrated planning should also ensure that the Commission can keep track on the Member States' efforts and whether the EU is on track to reach the common EU-targets.
3c	Are there any planning obligations that could be repealed?	No answer.
4	Which elements/articles of the current planning obligations in the field of renewable energy do you consider indispensable and why? If relevant please, refer to specific Articles of the Renewable Energy Directive .	<p>In general it would be beneficial to streamline the reporting and planning obligations for renewable energy. In this context, it is important to continue comprehensive planning and monitoring of national policies on renewable energy deployment which should be integrated into the new national climate and energy plans.</p> <p>Article 4 in the current Renewable Energy Directive stipulate that each Member State should adopt a national renewable energy action plan. The national renewable energy action plans shall set out Member States' national indicative trajectories for the share of energy from renewable sources consumed in transport, electricity and heating and cooling, taking into account the effects of other policy measures relating to energy efficiency on final consumption of energy. The plans should also consider cooperation between local, regional and national authorities, planned statistical transfers or joint projects, national policies to develop existing biomass resources and mobilise new biomass resources for different uses.</p> <p>It is important to continue the existing obligation to provide indicative trajectories for the share of renewable energy in consumption as part of the national climate and energy plans. The trajectories should still reflect the shares that are used in transport, electricity, heating and cooling. It should also be considered to include the gas sector – i.e. biomethane injected into the natural gas system. The national as well as EU policy measures should be described in the national plan and the effects of the national plans should be evaluated and transformed into projections for renewable energy deployment. The projections made by Member States with guidance from the Commission will be crucial for evaluating the level of ambition in the national plans and whether the binding EU target of 27 % share of renewable energy consumption in 2030 is likely to be met.</p> <p>The national plans should continue to include measures of regional cooperation and regional coordination should play a more important role in the national plans for 2030.</p>

5	<p>Which elements/articles of the current planning obligations in the field of energy efficiency do you consider indispensable and why? Please, if relevant, refer to specific Articles of the Energy Efficiency Directive and Energy Performance of Buildings Directive.</p>	<p>In general, all the planning obligations are important. Article 3 in the energy efficiency directive (EED) on the energy efficiency target is a central element of the Member States energy efficiency planning. Furthermore, article 7 on the energy efficiency obligation schemes is an important planning tool for the member states, as this article can create the greatest amount of savings in the EED. With regard to the Energy Performance of Buildings Directive, no obligations appear indispensable. The only planning obligation “National plans for nearly zero energy buildings” has already been carried out.</p> <p>In general it would be beneficial to streamline the reporting and planning obligations for energy efficiency in the heating and cooling sectors with other planning and reporting EU-obligations in order to illustrate synergies between different subsectors of the energy sector In this context. It should be noted that - according to the recent published EU heating and cooling strategy - the potentials for synergies are considerable if energy services for heating and cooling purposes are integrated and further coordinated with electricity supply.</p>
6	<p>Which elements/articles of the current planning in the field of low-carbon development strategies do you consider indispensable and why?</p>	<p>No answer.</p>
7	<p>Which elements/articles of the current planning obligations in the field of infrastructure development (like for example TEN-E) do you consider indispensable and why?</p>	<p>The reporting obligations set out in Art. 5 (4)-(6) of the TEN-E Regulation appear necessary for the monitoring of the progress of the development of projects of common interest. However, in order to reap any tangible benefits from the reporting, it would seem necessary to follow up with other initiatives such as active discussions in the regional groups on how difficulties and delays can be prevented/mitigated.</p>
8	<p>Which elements/articles of other existing planning obligations in the field of energy, including on security of supply, infrastructure and market integration do you consider indispensable and why?</p>	<p>Commission regulation (EU) No 543/2013 article 11.1</p> <p>In order to be able to move power from where it is available to where it is most needed and adjust portfolios accordingly, the market should be provided with information about planned and offered cross-border transfer capacities. According to Commission regulation (EU) No 543/2013 article 11.1 the TSO is obliged to report to ENTSO-E on the forecasted and offered capacity (MW) per direction between bidding zones in case of coordinated net transmission capacity based capacity allocation to ENTSO-E. This is an important indicator since it can show the availability on the interconnections and give an indication of where there might be bottlenecks or trade restrictions.</p> <p>Commission regulation (EU) No 543/2013 article 13</p> <p>As a result of the rapid deployment of intermittent generation sources away from consumption centres, transmission infrastructure has increasingly gotten congested in large parts of Europe. To relieve congestions TSOs have increasingly intervened in market operations instructing market participants to change their generation or trading commitments. In order to enable the market to understand where and why congestion management measures have become necessary, TSOs need to provide timely, detailed and reasoned information about their actions. Useful indicators include the obligations for the TSOs to report to ENTSO-E on the following:</p> <p>Information relating to congestion management measures:</p> <p>A. information relating to dispatching per market time unit, specifying:</p> <ul style="list-style-type: none"> • the action taken (that is to say production increase or decrease, load increase or decrease),

		<ul style="list-style-type: none"> • the identification, location and type of network elements concerned by the action, • the reason for the action, • capacity affected by the action taken (MW); <p>B.</p> <ul style="list-style-type: none"> • information relating to countertrading per market time unit, specifying: • the action taken (that is to say cross-zonal exchange increase or decrease), • the bidding zones concerned, • the reason for the action, • change in cross-zonal exchange (MW); <p>C.</p> <p>the costs incurred in a given month from actions referred to in points (a) and (b) and from any other remedial action.</p> <p>Regulation (EC) No 714/2009</p> <p>Lastly, the Regulation (EC) No 714/2009 provides conditions for cross-border access to the network. National energy regulators monitor the TSOs income on congestions. This is an important indicator as (EC) No. 714/2009 stipulates that income from congestion should be invested in ensuring the availability of the allocated capacity or in maintaining or increasing interconnection capacities through network investments, in particular in new interconnectors. Monitoring income from congestion provides an indication of how the interconnector is utilised and whether capacity should be increased.</p>
9	Can you provide qualitative or quantitative evidence on the administrative burden on Member States and other stakeholders resulting from planning obligations at EU level?	No clear picture exists on the administrative burden of the current planning and reporting obligations, but as a matter of principle, a lower administrative burden is always a priority.
10	SE SEPARAT DOKUMENT	
11	SE SEPARAT DOKUMENT	
12	Are you aware of overlaps or inconsistencies among the existing reporting obligations in the same or different areas of the energy acquis? Please provide examples.	<p>Energy Data is generally reported to EUROSTAT at the same time as the same data are used for the reportings under the Renewable Energy Directive, the Energy Efficiency Directive (article 24 (1)), etc. It should be considered whether the Commission, on the basis of the EUROSTAT reportings, could make the necessary calculations, instead of receiving the same data from Members States under different directives.</p> <p>Another example is the effect on CO2 emissions of deployment of Renewable Energy which is being reported every two years, in December, under the Renewable Energy directive. At the same time, every second year in March an obligation under the MMR requires member states to report ex-post and ex-ante estimated GHG reduction effects of implemented policies and measures. This is an area where a streamlining of reporting could be considered.</p>
13a	a) Which of the current reporting obligations could in your opinion be streamlined[*] into one integrated	With regard to NEEAPs (EED) it will make sense to include all of the building area policies into this one report and streamline these with the Energy performance of Buildings Directive (EPBD) reporting obligations.

	report and why?	Today the EPBD requires annual reporting which has overlaps with the NEEAPs: The reporting obligation under EPBD, Article 10 (“draw up a list of proposed measures and instruments including those of a financial nature, other than those required by the EPBD, which promote the objectives of the Directive” Much of the same information is provided in NEEAPs. Accordingly the reporting obligation should be transferred completely to the EED (NEEAP) (currently optional).
13b	Are there reporting obligations that should be kept separate from the integrated report?	No answer.
13c	Are there reporting obligations that could be repealed?	Not necessarily. It is of great importance that Member States are obliged to report on their obligations in order to allow the Commission to keep track of the efforts in the Member States as well as on whether the EU is on track towards reaching the common EU energy and climate targets.
14	Which elements/articles of the current reporting obligations in the field of renewable energy do you consider indispensable and why? Please, if relevant, refer to specific articles of the Renewable Energy Directive.	<p>The most indispensable reporting obligation is the quantification of the progress made by Member States with regards to the national deployment of renewable energy in the energy and transport sector. The progress should be evaluated every two years with regards to the efficiency of existing policies and the progress made towards a national indicative renewable 2020 trajectory.</p> <p>The Commission should provide a template for the reporting and specify how the gross final consumption of electricity, transport, heating and cooling from renewable energy sources should be calculated by the Member States. This will be crucial in order to keep track of the collective progress made by the Member States towards the binding EU target of at least 27 % renewable energy consumption in 2030.</p> <p>The monitoring of bioenergy sustainability should be continued and strengthened as part of a new comprehensive EU bioenergy policy that covers both solid biomass, biofuels and biogas for electricity, heating, cooling and transport.</p>
15	Which elements/articles of the current reporting obligations in the field of energy efficiency do you consider indispensable and why? Please, if relevant, refer to specific articles of the Energy Efficiency Directive, the Energy Performance of Buildings Directive and the legislation on products	<p>In Article 24.1 of the Energy Efficiency Directive and annex XIV part I, a rather large number of annual reports are required, including annual statistics for electricity and heat generation from CHP-plants and industrial waste plans. In Annex XIV, part 2, national energy efficiency action plans shall be prepared every three years, including assessments of progress achieved in implementing the comprehensive assessments according to Article 14.1 in EED.</p> <p>Future reporting should be streamlined and have a well-defined purpose, e.g. according to monitoring of European wide progress for achieving EU targets in 2030. Annual reporting of statistical information should be limited taking into account that such reporting to a large extend already is reported to EuroStat by MS.</p>
16	Which elements/articles of the current reporting in the field of low-carbon development strategies do you consider indispensable and why?	No answer.
17	Which elements/articles of the current reporting obligations in the field of infrastructure development (like for example TEN-E) do you consider indispensable and why?	<p>The reporting obligations set out in Art. 5 (4)-(6) of the TEN-E Regulation appear necessary for the monitoring of the progress of the development of projects of common interest.</p> <p>However, in order to reap any tangible benefits from the reporting, it would seem necessary to follow up with other initiatives such as active discussions in the regional groups on how difficulties and delays can be prevented/mitigated.</p>

<p>18</p>	<p>Which other reporting obligations in the field of energy, including on security of supply infrastructure and market integration, do you consider indispensable and why?</p>	<p>1) Wholesale price convergence: Today the national energy regulators report on the wholesale price convergence to ACER. The convergence of wholesale electricity prices can be regarded as an indicator of market integration and the free flow of electricity between price zones. Price difference indicates bottlenecks, but the optimal level of market integration does not necessarily require full price convergence. It is a simple indicator that can show the degree of market coupling. However, it is difficult to set a target for actual convergence, since an optimal level of market integration does not necessarily require full price convergence.</p> <p>2) Share of electricity traded on the day-ahead and intraday market measured in relation to gross consumption and production of electricity. Today, the national energy regulators collect this information. It will be a useful indicator in a European governance system for transparency, competition and market coupling.</p> <p>3) Bottlenecks related to three types of issues: Market integration (between price zones), generation connection, security of supply. Today ENTSO-E reports this information in their TYNDP reports. The information is important as it identifies where new interconnections need to be built or reinforced on a European level. Furthermore, the information is illustrative in order to show where more regional cooperation would be beneficial.</p> <p>4) Probabilistic approach for power adequacy assessments Power adequacy could be an important indicator on security of supply. The power system adequacy should be based on a probabilistic approach as this provides a more accurate picture of the probability of having sufficient power to satisfy consumption. A probabilistic model ensures that the intermittent nature of wind and solar based production, small-scale hydro, small and large power plants, combined heat and power, demand side response, transmission lines as well as interconnectors are represented in the calculation in a manner that more accurately reflects their contribution to capacity adequacy. A probabilistic method would also make it easier to analyse the potential for more shared security of supply across borders. And finally, a probabilistic approach would provide more correct decisions on new investments to improve security of supply.</p> <p>The European governance system should define a set of common indicators to evaluate system adequacy based on a probabilistic approach. This will enable a more accurate comparison of system adequacy across Member States. The indicators should reflect the potential capacity shortage after all market instruments (spot, intraday, balancing market) has been applied. The indicators could be Loss of Load Probability (LOLP) and Expected Unserved Energy (EUE).</p>
<p>19</p>	<p>Which elements of the current reporting obligations in the field of energy research and innovation do you consider indispensable (investments in R&I, R&I funding programmes and projects and direct funding to institutions) and which information is publicly available or reported to other organisations? How can this reporting be made more consistent between Member States and more updated so that it can</p>	<p>Investments in R&I is the most indispensable element. Reporting on R&I funding is done on an annual basis to the IEA and has been done so consistently since 2002. The IEA database is to a wide extent useful however there are no mechanisms to ensure that countries report to the IEA.</p> <p>Information on funding programmes could be a useful additional indicator.</p>

	support more transnational cooperation in this field?	
20	Can you provide qualitative or quantitative evidence on the administrative burden imposed by existing reporting obligations on both Member States and other stakeholders?	No clear picture exists on the administrative burden of the current planning and reporting obligations, but as a matter of principle, a lower administrative burden is always a priority.
21	SE SEPARAT DOKUMENT	
22	Do you agree that a comprehensive new legislative act covering both planning and reporting obligations of policy areas related to the Energy Union including the 2030 Energy and Climate framework would ensure consistency and reduce unnecessary administrative burden?	Yes: X No: No opinion:
23	Do you think that non-legislative approaches (e.g. guidance to Member States) can assure effective and efficient streamlining of planning and reporting obligations and would provide the necessary certainty for investors?	Yes: No: X No opinion:
24-26	SE SEPARAT DOKUMENT	
27	In your view, what should be the nature of the initiative to best streamline the planning and reporting obligations in the framework of the governance of the Energy Union? If other, please elaborate	<ul style="list-style-type: none"> - Non-binding guidance for both planning and reporting obligations covering all Energy Union dimensions [] - Regulating planning and reporting obligations in sectorial legislation as currently the case: [] - Regulating both planning and reporting obligations by a new comprehensive legislative act covering all Energy Union dimensions: [X]
28	Please elaborate on the reasons justifying your choice in the previous question:	Denmark supports a streamlining of the current planning and reporting obligations with the aim of creating a common framework for measuring progress towards common energy and climate objectives. Such a common framework should cover the five dimensions of the Energy Union: supply security, a fully Integrated internal energy market, energy efficiency, climate action and research & innovation. The purpose of a new framework should be multiple: to facilitate a better overview of progress towards the five dimensions, to ensure that Member States comply with obligations, and to bring down administrative costs. A number of the existing planning and reporting obligations are mandatory for Member States and to the extent these are replaced by other obligations as part of the national plans, these should be mandatory too. Variation with regard to the mandatory nature of planning and reporting could be allowed. E.g. measures that are not mandatory to report on today should not necessarily become mandatory as part of the national plans.
29	SE SEPARAT DOKUMENT	

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30a	Building further on your replies to the sections devoted to the existing planning and reporting obligations (questions 1-21), which of the areas/articles subject to current planning obligations should be included in the integrated National Energy and Climate Plans? Please explain.	This has been addressed in previous answers.
30b	Building further on your replies to the sections devoted to the existing planning and reporting obligations (questions 1-21), which of the areas/articles subject to current reporting obligations should also be included in the integrated National Energy and Climate Plans? Please explain.	This has been addressed in previous answers.
30c	Are there current planning obligations that should continue to be treated separately?	No answer.
31	What political process would be necessary to ensure the stability of the National Energy and Climate Plans (e.g. approval by national governments, cross-party approval, approval by national parliaments, or national legislative acts)?	The political process will to a large extent depend on the final design and content of the national plans. With reference to question 31, 33 and 34 it is likely that national administration and the Commission will play a big part in the administration of planning and reporting.
32	What, in your opinion, would be the main factors that could justify an update of the National Energy and Climate Plans in the period from 2021 to 2030 (e.g. energy market developments, economic changes, evolving EU legislation, or collective progress made towards the Energy Union objectives)?	Regular updates of the National Energy and Climate Plans are required at given intervals, due to technology development, changes in prices, and other circumstances.
33-37	SE SEPARAT DOKUMENT	