

# WindEurope response to public consultation

“Streamlining of  
planning and reporting  
obligations as part of  
the Energy Union  
governance”

APRIL 2016

# EXECUTIVE SUMMARY

National climate and energy plans will be the backbone of the Energy Union governance system ensuring the cost-effective delivery of the EU-wide binding renewables target of at least 27%. WindEurope supports increasing this objective to at least 30% as part of the post-2020 Renewable Energy Directive.

Reliable planning and reporting obligations will be necessary to attract investments in renewable energy assets and ensure that the projects necessary to deliver the 2030 target will be executed in time. In particular, the planning process for the post-2020 period has to start already today to allow investors to prepare the next investment cycle.

Currently, wind investors are faced with a lack of visibility on post-2020 regulatory frameworks as only 6 out of 28 Member States have commitments for renewables beyond 2020. This prevents timely investment decisions and endangers the bankability of renewable energy projects.

WindEurope therefore considers that the European Commission should pursue an active political dialogue with Member States to ensure that concrete national commitments and enabling policies for renewables are in place well before 2019.

WindEurope also believes that a more coherent planning and reporting process in the post-2020 period requires a level of streamlining. This should however not come at the expense of thorough and quality data necessary to monitor the fulfilment of the 2030 EU-wide binding renewables target.

Member States should therefore outline their 2030 energy and climate policy, anchored in 2050 national strategies, in high-level integrated plans covering all five dimensions of the Energy Union. National plans should be based on a binding template, enshrined in legislation, and stemming from the revised sectoral legislation.

A differentiated planning and reporting approach should be applied for the Energy Union dimensions with and without targets. Requirements should be more rigorous and offer a higher degree of technical detail for the dimensions with targets. This should be dealt with in sectoral legislation.

The following key elements should be covered in the European Commission's streamlining of planning and reporting obligations proposal:

- 1) Providing robust planning obligations relevant to renewables, namely:
  - binding template for national energy and climate plans;
  - a concrete timeline for finalising the first post-2020 national plans well ahead of 2020;
  - an update of national plans, in 2023, to take stock of changing circumstances.
  
- 2) Granting priority to the renewable energy elements of the template, namely:
  - prioritising 2030 headline targets and trajectories compared to other Energy Union dimensions;
  - defining 2030 renewable energy objectives stemming from long-term 2050 national strategies;
  - setting sectoral targets and trajectories for electricity, heating and cooling, transport;

- outlining national measures for renewable deployment, including support schemes, simplified administrative procedures, transmission & distribution network reinforcement;
  - featuring a legal reference in sectoral legislation as part of the revised Renewable Energy Directive.
- 3) Providing transparent and stringent reporting and monitoring provisions, including:
- biennial reporting for Member States;
  - biennial reporting from the European Commission to the Council and Parliament to ensure transparency and accountability over collective progress towards the binding 2030 renewable energy target;
  - reinforced oversight of the European Commission over national progress.

# CONSULTATION QUESTIONS

## Evaluation of planning obligations

### *Existing obligations*

The EU energy and climate legislation includes a number of different planning obligations for the Member States. Planning obligations play a crucial role for EU energy policies in e.g. the fields of renewable energy, energy efficiency, security of gas supply, energy performance of buildings, waste management and decarbonisation. The main features of existing planning obligations can be summarised as follows:

- Current planning obligations usually include indicators and projections as an analytical basis as well as policies and measures needed to achieve the plan's objectives;
- Current plans usually cover a specific area of the energy or climate field, but do not necessarily refer to possible overlaps and interactions with other plans in these fields; in some cases templates are provided, which can be either voluntary or compulsory;
- Plans often have to be submitted once, but in many cases a periodical revision or the submission of new plans is required. The process for the adoption of the plans is often left to the discretion of the Member States;
- The role of the Commission varies. In some cases, it monitors plans, in other cases, it analyses plans and is requested to report to the European Parliament and the Council. In some instances the Commission could ask for modifications. Furthermore, it can use its enforcement powers, if the planning obligations are not fulfilled or not all the necessary details/content were provided.

### 1. How would you rate the following aspects of such planning obligations at EU level?

	Very important	Important	Less important	Not important	No opinion
Coherence of national plans among all EU Member States		X			
Effective and efficient implementation of EU legislation in the energy and climate field	X				
Achievement of	X				

the EU energy and climate objectives					
Increased certainty for investors across all EU Member States stimulating economic growth as well as research, innovation and competitiveness of the EU	X				
Better implementation of international commitments by the EU as a whole and by Member States (e.g. concerning the reduction of greenhouse gas emissions)	X				
The Commission is better enabled to provide substantial and useful advice		X			

If other, please explain: (up to 1000 characters)

- 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. (1000 characters)

3. a) Which of the current planning obligations could in your opinion be streamlined into one integrated plan and why? (1500 characters)  
  
b) Are there any planning obligations that should be kept separate from the integrated plan? (1500 characters)  
  
c) Are there any planning obligations that could be repealed? (1500 characters)
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. (1000 characters)

2030 national plans should capitalise on the National Renewable Energy Action Plan's building blocks, namely overall and sectoral renewable energy shares by 2030, indicative trajectories, a template (Art. 4/ Annex VI).

Member States should define the renewable energy element of their plans building upon the 2020 national targets. The renewables share per sector should be maintained to provide investors with visibility over market growth. Indicative trajectories will allow the Commission to monitor progress towards the EU-wide renewables target.

National plans should outline measures to incentivise higher uptake of renewables including support mechanisms, planned reinforcements of transmission and distribution infrastructure and simplified administrative procedures. They should indicate, where applicable, the annual wind capacity at end-of-life.

National plans should be based on a standardised, binding template to ensure coherence and comparability between Member States contributions to the 27% target. The renewable energy components of national plans' template should be referenced in the revised Renewables Directive.

5. 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. (1000 characters)
6. Which elements/articles of the current planning in the field of low-carbon development strategies do you consider indispensable and why? (1000 characters)

Regarding Directive 2003/87/EC and Article 10c derogation thereof, this mechanism for lower income Member States has proved to be inadequate as strong sustainability and full transparency criteria are lacking. To effectively leverage private investments in a modernised power sector and contribute to the EU's 2030 climate & energy targets, the reporting requirements on the article 10c derogation should be strengthened.

The assessment of projects should be linked to the 2030 governance process and Member States' contribution to the delivery of the EU 2030 climate & energy targets. This implies that under the transitional free allocation, the investment plans in which projects are set out need to be linked to

Member States’ performance in decarbonizing their power sector and bringing forward adequate national energy plans. The Commission should be able to use the granting of a free allocation derogation as a means of keeping Member States on track to modernise their power systems.

7. Which elements/articles of the current planning in the field of infrastructure development (like for example TEN-E) do you consider indispensable and why? (1000 characters)

Member States should continue to report planned investment in interconnections projects for a period of at least five years (Security of Electricity Supply Directive, Art. 7) and TSOs should submit to National Regulatory Authorities a 10-year network development plan (Electricity Directive, Art. 22). This is indispensable to provide long-term visibility on necessary transmission infrastructure needed to balance wind output over broader geographical areas.

System operators should consider energy efficiency / demand side response /storage solutions that might supplement the need to upgrade or replace network reinforcement from a system perspective (Electricity Directive, Art. 25). However, this should not come at the expense of increased and non-remunerated curtailment of wind power producers.

Future planning requirements should be made on the assumption of preparing grids to accommodate a share of 50% of renewables in electricity production by 2030. Member States should also plan the deployment of smart grids technologies alongside the necessary regulatory framework from National Regulatory Authorities.

8. Which elements/articles of other existing planning obligations in the field of energy, including security of supply, infrastructure and market integration do you consider indispensable and why? (1000 characters)

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? (1000 characters; a possibility to upload further evidence is provided at the end of the questionnaire)

*Future obligations*

10. What level of importance do you attach to future planning obligations for Member States in the following key elements of the Energy Union Strategy? [rank]

	Very important	Important	Less important	Not important	No opinion
Security of	X				

supply					
Internal Energy Market	X				
Energy infrastructure	X				
Energy efficiency	X				
Renewable energy	X				
GHG emissions reduction (decarbonisation)	X				
Research, innovation and competitiveness	X				

### C. Evaluation of reporting obligations

#### *Existing obligations*

In the energy and climate field there are a number reporting obligations for the Member States and for the Commission. These have been developed to cover specific elements of the Energy Union, with less focus on integrated planning and reporting. Both the Member States and the Commission have to abide to reporting obligations. Usually, the information collected through Member States' reports is used by the Commission to assess trends in the climate and energy sectors, assess progress towards certain policy objectives, to monitor implementation and to propose policy and legislative reforms. Importantly, there are several different types of reporting obligations. The following distinctions are useful for the purpose of evaluating them:

- Reporting obligations can be regular or irregular. The former are fulfilled periodically; the latter usually once or after a specific request.
- The content of the reporting obligations may be specified in EU legislation, but the level of detail varies from one sector to another.
- Templates used to respond to reporting obligations are sometimes compulsory. In other cases, they have a voluntary nature.
- Reporting obligations are set up according to the information needs of each area of the energy field linked to the specific requirement of the objective of the initiative. Only in some cases they are coordinated with reporting obligations in other areas.

11. How would you rate the following aspects of the reporting obligations in EU legislation?

	Very important	Important	Less important	Not important	No opinion
Coherence of reporting formats among all EU Member States	X				
Possibility to monitor the performance and trends (and put in place corrective measures if the results are lagging behind)	X				
Effective and efficient implementation of EU legislation in the energy and climate field	X				
Assess progress to targets at Member State level and enable aggregation of data at EU level	X				
Better comparability of data from different Member States enabling an informed evaluation	X				
Increased certainty for investors across all EU Member States stimulating economic growth as well as research, innovation and competitiveness of the EU	X				
EU as a whole and Member States themselves are better informed on the actual performance and it provides ground for further action	X				

If other, please explain (1000 characters)

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 (1000 characters)

13. A) Which of the current obligations could in your opinion be streamlined into one integrated report and why? (1500 characters)

b) Are there reporting obligations that should be kept separate from the integrated report? (1500 characters)

c) Are there reporting obligations that could be repealed? (1500 characters)

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. (1000 characters)

Member States reporting on national renewable energy shares, support schemes, simplified administrative procedures and transmission and distribution networks reinforcements as per Article 22 (1 a, b, c, e, f) should be maintained to provide a holistic overview of national policies and ensure transparency for investors. Biennial reporting will allow the European Commission to monitor collective progress towards the binding 2030 renewable energy target and will serve as an early-warning system giving way to corrective measures in case Member States deviate from their pledges.

The European Commission's monitoring and reporting obligations as per Article 23 should be maintained. The Commission should be able to intervene in case of counter-productive measures and, as under the *European Semester*, should make official policy recommendations on national renewable energy policies.

The Commission should report biannually to Member States and the European Parliament as part of a reliable governance process and ensure transparency over collective progress.

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. (1000 characters)

16. Which elements/articles of the current reporting obligations in the field of low-carbon development strategies do you consider indispensable and why? (1000 characters)

17. Which elements/articles of the current reporting obligations in the field of infrastructure development (like TEN-E) do you consider indispensable and why? (1000 characters)

Member States' reporting requirements in the post-2020 period should provide evidence of the progress made for the fulfilment of the 15% interconnection target. Planning and reporting obligations could be strengthened to improve transparency of investments in distribution networks.

18. Which other reporting obligations in the field of energy, including on security of supply, infrastructure and market integration, do you consider indispensable and why? (1000 characters)

National Regulatory Authorities (NRAs) should collect variable renewable electricity production curtailments to provide transparency and avoid non-compliant behaviour, including: (a) duration and spilled energy, (b) justification by the TSO/DSO. They should provide more clarity on trade flows: monthly national production, load flows, traded volumes, power certification.

For electricity transmission networks to be used more efficiently and make more cross-zonal tradable capacities available to the market, reporting on the progress made by TSOs in implementing the state of the art capacity calculation method in a coordinated manner is needed.

For balancing markets, evolution of prequalification and procurement rules and imbalance settlement features should be reported. The participation of RES generators in these markets should be included.

NRAs should report developments related to regional adequacy assessments and the introduction of Capacity Remuneration Mechanisms.

19. 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 publically available or reported to other organisations? How can this reporting be made more consistent between Member States and more updated so that it can support more transnational cooperation in this field? (1000 characters)

In the field of energy research and innovation the following elements are important to report on:

- Investments in R&I
- Structures/platforms consulted in drafting public R&I funding programmes (e.g. European technology platforms).

In addition, a clear work-flow and timeline set-up between SET-Plan Steering Group and National initiatives should be defined.

20. Can you provide qualitative or quantitative evidence on the administrative burden imposed by existing reporting obligations on both Member States and other stakeholders? (1000 characters, a possibility to upload further evidence is provided at the end of the questionnaire)

*Future obligations*

21. Do you consider future reporting obligations for Member States in the following key elements of the Energy Union Strategy to be?

	Very important	Important	Less important	Not important	No opinion
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Security of supply	x				
Internal Energy Market	x				
Energy infrastructure	x				
Energy efficiency	x				
Renewable energy	x				
GHG emissions reduction (decarbonisation)	x				
Research, Innovation and competitiveness	x				

#### D. Options for streamlining planning and reporting obligations

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

**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**

No opinion

24. Concerning options to streamline planning and reporting obligations in the framework of the governance of the Energy Union, how would “Non-binding guidance for both planning and reporting obligations covering all Energy Union dimensions” influence the following categories?

	Considerable	Improvement	No	Deterioration	Significant	No
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	improvement		change		deterioration	opinion
Coherence of national plans and reporting formats among all EU Member States					X	
Effective and efficient implementation of EU legislation in the energy and climate field					X	
Achievement of the EU energy and climate objectives					X	
Possibility to monitor the performance and trends (and put in place corrective measures if the results are lagging behind)					X	
Increased certainty for investors across all EU Member States stimulating economic growth as well as research, innovation and competitiveness of the EU					X	
Better implementation of international commitments by the EU as a whole and by Member States (e.g.					X	

concerning the reduction of greenhouse gas emissions)						
The Commission is better enabled to provide substantial and useful advice and ensure uniform application of EU legislation					X	

25. Concerning options to streamline planning and reporting obligations in the framework of the governance of the Energy Union, how would “Regulating planning and reporting obligations in sectorial legislations as currently the case” influence the following categories?

	Considerable improvement	Improvement	No change	Deterioration	Significant deterioration	No opinion
Coherence of national plans and reporting formats among all EU Member States			X			
Effective and efficient implementation of EU legislation in the energy and climate field			X			
Achievement of the EU energy and climate objectives			X			
Possibility to monitor the performance and trends (and put in place corrective measures if the			X			

results are lagging behind)						
Increased certainty for investors across all EU Member States stimulating economic growth as well as research, innovation and competitiveness of the EU			X			
Better implementation of international commitments by the EU as a whole and by Member States (e.g. concerning the reduction of greenhouse gas emissions)			X			
The Commission is better enabled to provide substantial and useful advice and ensure uniform application of EU legislation			X			

26. Concerning options to streamline planning and reporting obligations in the framework of the governance of the Energy Union, how would “Regulating both planning and reporting obligations by a new comprehensive legislative act covering all Energy Union dimension” influence the following categories?

	Considerable improvement	Improvement	No change	Deterioration	Significant deterioration	No opinion
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Coherence of national plans and reporting formats among all EU Member States				X		
Effective and efficient implementation of EU legislation in the energy and climate field				X		
Achievement of the EU energy and climate objectives				X		
Possibility to monitor the performance and trends (and put in place corrective measures if the results are lagging behind)				X		
Increased certainty for investors across all EU Member States stimulating economic growth as well as research, innovation and competitiveness of the EU				X		
Better implementation of international commitments by the EU as a whole and by Member States (e.g. concerning the				X		

reduction of greenhouse gas emissions)						
The Commission is better enabled to provide substantial and useful advice and ensure uniform application of EU legislation				X		

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?

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

If other, please elaborate (1000 characters)

WindEurope considers that a more coherent planning and reporting process requires a level of streamlining which should, however, not come at the expense of detailed and quality data.

Providing a holistic overview of Member States progress in different climate and energy strands through an integrated plan will facilitate the European Commission's task of overseeing the progress towards the EU climate and energy objectives.

A single plan and report could, however, dissuade detailed information necessary to monitor the fulfilment of the headline 2030 targets. This would undermine the transparency and accountability principles that a reliable governance process must provide.

It is of utmost importance that the planning and reporting obligations make a clear distinction between the Energy Union dimensions with binding and non-binding targets. A more solid and detailed planning and reporting framework is needed for areas with EU targets, in particular renewable energy.

28. Please elaborate on the reasons justifying your choice in the previous question (1000 characters)

Member States should outline their 2030 energy and climate policy vision, anchored in 2050 national strategies, in high-level integrated plans covering all five dimensions of the Energy Union. This would

allow to explore synergies between the various dimensions and streamline a number of planning and reporting requirements.

These plans should be based on a binding template, enshrined in legislation, and stemming from the revised sectoral legislation to allow for consistency and proper monitoring by the European Commission. The renewable energy elements of the template should be referenced in the revised Renewable Energy Directive.

Specific planning and reporting requirements in areas with targets should, however, remain within sectoral legislation. This would ensure that all the technical data necessary for monitoring the achievement of the EU-wide renewable energy target will be provided whilst not overburdening the integrated plans and reports.

## E. Options for the governance system of the Energy union and its process

### E. 1 Scope and nature of the integrated national climate and energy plans

National plans should take a holistic approach and address the five dimensions of the Energy Union in an integrated way recognising the interactions between different dimensions. The nation plans should cover the period from 2021 to 2030 and build upon what each Member State should deliver in relation to their policies for 2020 and also include a perspective until 2050. These national plans should provide long term predictability and certainty for investment and ensure greater cooperation and coherence among Member States' approaches on climate and energy policies.

29. Notwithstanding the fact that all five dimensions will be part of the National Energy and Climate plans, which elements of the Energy Union Strategy should be given prominence:

	Very important	Important	Less important	Not important	No opinion
Security of supply	X				
Internal Energy Market	X				
Energy infrastructure	X				
Energy efficiency	X				
Renewable energy	X				
GHG emissions reduction (decarbonisation)	X				
Research, Innovation and	X				

competitiveness					
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30.

a) 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? (1500 characters)

Articles 4 and Annex VI of Directive 2009/28/EC should be adapted to the EU-wide binding target.

As under Article 4, Member States should set 2030 renewable energy contributions in national plans. The uniform and binding template for national plans should include as a minimum:

- **Concrete 2030 renewable contributions and trajectory stemming from 2050 energy and climate strategies** to align Member States' policies with the EU's long-term decarbonisation objectives;
- **Indicative trajectories and interim targets** for electricity, heating and cooling, transport to ensure a linear progress towards the binding 2030 renewable energy target% renewable target to give an early indication of potential deviation;
- Technology-specific targets and trajectories where appropriate. For maturing technologies, such as offshore wind, the 2030 national commitments need to indicate specific deployment volumes planned to deliver cost reductions through scalability;
- **National policy measures for the deployment of renewables** including support mechanisms, infrastructure development and streamlining of administrative procedures;
- Indicative measures adopted by Member States in renewable energy-related areas (e.g. taxation) to ensure coherence among different policy streams.

The renewable energy components of the template should be referenced in the revised Renewable Energy Directive in annex.

b) 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? (1500 characters)

Articles 22 and 23 of Directive 2009/28/EC should be adapted to the EU-wide binding target.

As under Article 22, Member States should continue to report biennially to the European Commission. The reporting obligations of the European Commission, namely presenting an EU-wide progress report to the Council and the European Parliament, should be maintained in order to provide transparency and visibility over the EU's progress towards the binding 2030 renewable energy target.

Article 23 should grant reinforced legal means to the Commission to monitor progress. The Commission should make country-specific recommendations as part of every biennial reporting cycle in order to address challenges in meeting national objective in a timely manner. The Commission should intervene

in case of counter-productive measures (e.g. negative impact on existing/future investments) to national regulatory frameworks.

c) Are there current planning obligations that should continue to be treated separately? (1500 characters)

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)? (1000 characters)

The planning process for the post-2020 period has to start already today to allow investors to prepare the next investment cycle.

Currently, wind investors are faced with a lack of visibility on post-2020 regulatory frameworks as only 6 out of 28 Member States have commitments for renewables beyond 2020. This prevents timely investment decisions and endangers the bankability of renewable energy projects.

The European Commission should pursue an active political dialogue with Member States to ensure that concrete national commitments and enabling policies for renewables are in place well before 2019.

Furthermore, national climate and energy plans should be approved by national governments and should be in line with national climate and energy strategies and objectives. It is important that national plans are consulted between neighbouring countries, in particular with regards to issues of cross-border electricity flows, required infrastructure and capacity adequacy.

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 2021-2030 (e.g. energy market developments, economic changes, evolving EU legislation, or collective progress made towards the Energy Union objectives)? (1000 characters)

A lesson learned from the current regulatory regime is that national plans became outdated and progress reports failed to address key regulatory challenges to the deployment of renewables. The European Commission should therefore have a reinforced oversight over Member States' progress and the ability to make country-specific recommendations in order to address challenges in meeting national objectives.

National plans should be updated once, in 2023, in order to take stock of changing circumstances and to ensure that the EU is on track to reach the binding 2030 renewable energy target. If that is not the case, such an early indication will allow for the Commission to undertake the necessary corrective measures.

## **E.2 Role of different institutions in the governance process**

33. How relevant would you rate the role of different institutions in the development of integrated National Energy and Climate Plans?

	Very relevant	Relevant	Less relevant	Not relevant	No opinion
European Commission	X				
European Parliament	X				
European Council			X		
Energy Council	X				
Environment Council	X				
National administration	X				
National parliaments	X				
National stakeholders			X		
Neighbouring or other group of Member States		X			
Regional fora		X			

34. How relevant would you rate the role of different institutions in the monitoring of the implementation of integrated National Energy and Climate Plans?

	Very relevant	Relevant	Less relevant	Not relevant	No opinion
European Commission	X				
European Parliament	X				
European Council			X		
Energy Council	X				
Environment Council	X				
National administration		X			

National parliaments		X			
National stakeholders			X		
Neighbouring or other group of Member States			X		
Regional fora			X		

35. With respect to the National Energy and Climate Plans, what should be the role of the European Commission in order to ensure the achievement of the Energy Union's objectives?

	Very relevant	Relevant	Less relevant	Not relevant	No opinion
Support to Member States in developing national plans, notably by providing templates and technical support and disseminating best practice	X				
Review national plans and analyse Member States' contributions	X				
Issue policy recommendations, notably in its annual State of the Energy Union	X				
Approve national plans	X				
Propose measures on EU level in view of delivering on the objectives of the Energy Union	X				

### E.3 Regional cooperation to establish, and peer review before finalisation of, integrated climate and energy plans

36. In accordance with the conclusions of October 2014 and March 2015 European Councils, the new governance system should facilitate the coordination of national energy policies and foster regional cooperation. How important would you rate regional cooperation in the course of integrated climate and energy plans?

	Very important	Important	Less important	Not important	No opinion
As part of their national integrated plans Member States should jointly develop regional objectives, standards and common coherent strategies on the relevant dimensions of the Energy Union		X			
The national plans should describe how they reflect regional integration and cooperation on the Energy Union domains		X			
Member States should consult relevant other Member States on national plans before their submission		X			
The plans should provide clear account of these consultations and how they are incorporated in the plans			X		
The Commission should guide the process, and develop appropriate for a for consultations of draft plans and regional cooperation where required		X			

37. Concerning consultation and mutual reviews of the integrated National Energy and Climate Plans (meaning that plans or progress reports of one Member State being reviewed by other Member States), how important would you rate the following options?

	Very important	Important	Less important	Not important	No opinion

Only consultations should take place in the preparation of the plans leading to the draft plans		X			
Mutual reviews should be done on draft plans		X			
Mutual reviews should be also used for progress reports assessing the implementation of plans					X
Mutual reviews should be of voluntary nature for Member States					X
Mutual reviews should be mandatory for Member States					X
A dedicated system of mutual reviews should be established including the creation of adequate fora		X			