

RGI Statement on the PCI Consultation

February 2019

The Renewables Grid Initiative (RGI) is a unique alliance of electricity transmission system operators (TSOs) and non-governmental organisations (NGOs) from across Europe. RGI promotes the transparent and environmentally sound grid and system developments that are required to accommodate the further steady growth of electricity from renewable energy sources. RGI Members jointly address the challenges of the energy transition with NGOs promoting energy and climate political objectives and TSOs leading in implementing the political objectives set by European and national authorities.

RGI is not in a position to respond formally to the consultation on every single listed project, but would like to express some general statements. RGI exclusively refers to electricity PCIs and our statements do not apply to any other PCIs.

RGI welcomes the efforts by the Commission to select and identify PCIs that are necessary infrastructure for achieving the European Union's climate and energy policy objectives. It is very important that projects that contribute to, and/or are coherent with delivering the objectives agreed upon in the Paris Agreement are included in the final PCI list. This is essential to improve the reputation of the PCI-label across the European Union and its perception amongst European citizens where the projects are to be realised.

The European Commission together with the Regional PCI-Groups is currently running a process 'Identification of regional system needs PCI 2018-2019 exercise'. The proposed methodology is still under review with room for improvement and need for further clarification. RGI in principle welcomes the efforts made by the European Commission to amend the process by which it selects the PCIs, especially with reference to the improvements achieved in making the process increasingly accessible and transparent to all stakeholders.

There is an urgent need to close the gap between assigning PCI status to individual projects and explaining to stakeholders affected by such projects how these contribute to resolving needs which are of importance to the stakeholders. Skepticism against new infrastructure development continues to be at a high level and especially projects of pan-European relevance are easily accused of helping exclusively the neighbouring country or energy traders but not catering to the interests of society, nor of local communities where most of the impacts are felt.

It is therefore important to develop approaches and local solutions which may resonate with stakeholders. The proposition of the Commission to identify the need via indicators for market integration, security of supply and sustainability is therefore considered beneficial. It is important to pursue the identification of clear criteria to determine system needs to be addressed through infrastructure development, before applying them to the PCI selection.

Moreover, we welcome the Commission efforts in the context of the Energy Infrastructure Forum to stimulate the development of new indicators to better recognize stakeholders engagement activities and hope to see these used, when complete, also for the PCIs.

It is furthermore important that a needs assessment process duly considers potential alternatives to new/refurbished infrastructure such as market mechanisms, operational actions or increase in efficiency as the Commission proposes in the same methodology document which is currently under review.

RGI invites the European Commission to positively consider the inclusion of projects between European Members and neighboring Countries, especially when they contribute to speed up the energy transition, foster integration of RES and improve security of supply and integration of power markets.

Therefore, RGI positively considers the inclusion of projects between EU Member States and Neighboring Countries (i.e North Africa and Energy Community).

In this regard, for RGI it is important to see that the European Commission has also included in the process the definition of the 4th PCI list the evaluation of interconnection capacity reinforcements between Europe and North Africa, and Europe and the Energy Community, regions of high potential in terms of RES integration, growth of electricity demand and market enlargement with the European one. In these cases, it is paramount that the selected projects contribute to the European energy and climate targets and that the same standards of nature protection and stakeholders engagement are applied on both sides of the interconnector.

Finally, the recommendations of the Commission's Expert Group for Electricity Interconnection Target should be carefully considered in the PCI selection process and criteria and should lead to support the public acceptance on the PCI projects at country level.

About RGI

The Renewables Grid Initiative is a unique collaboration of NGOs and TSOs from across Europe. We promote transparent, environmentally sensitive grid development to enable the further steady growth of renewable energy and the energy transition. RGI members originate from a variety of European countries, consisting of TSOs from Belgium (Elia), Croatia (HOPS), France (RTE), Germany (50Hertz, Amprion and TenneT), Ireland (EirGrid), Italy (Terna), the Netherlands (TenneT), Switzerland (Swissgrid) and Norway (Statnett), Spain (Red Eléctrica de España); and NGOs such as WWF International, BirdLife Europe, Germanwatch, Fundación Renovables, Legambiente, the Royal Society for the Protection of Birds (RSPB), Climate Action Network (CAN) Europe, Natuur&Milieu, Transport and Environment (T&E) and Zero. RGI was launched in July 2009.