

March 2012

The Renewables-Grid-Initiative warmly welcomes the Commission's work and broadly supports the current proposal. We strongly support the aims to accelerate and improve the legal and administrative frameworks for grid development.

We suggest that the current proposed Regulation needs strengthening in three areas:

1. EU environmental legislation must be implemented proactively to achieve more efficient planning and permitting procedures, and must not be undermined;
2. Public participation and transparency measures must be improved further to make PCIs showcases in winning public acceptance - including in the first phases of planning; and
3. Stronger long term planning in grid development is needed to enable full integration of both decentralized and large-scale renewable energies in the future.

1. Environmental legislation and grid development

RGI partners (TSOs and NGOs) have jointly developed the "European Grid Declaration" which contains a set of principles on how to develop Europe's power grid in a timely manner and with full and proactive implementation of Europe's environmental legislations. RGI has identified this as a key pillar to sustained public support for grid expansion. Its success requires awareness and support of energy regulators.

Proactive environmental planning can speed-up grid development

Experiences with implementation of strategic environmental assessment (SEA - Directive 2001/42) in grid development have shown that this can significantly help to speed up permitting procedures (e.g. in Italy). RGI calls on Parliament and Council to ensure grid development proceeds in line with the principles in the European Grid Declaration (e.g. by the inclusion of a specific recital and/or through Commission guidelines subsequently issued) and in particular to recommend the application of SEA in strategic spatial planning "as a means to find the most environmentally acceptable options with regard to protected areas and ecological sensitivities" (European Grid Declaration Principle 4.1.3).

EU objectives and legislation for nature conservation must not be undermined

In order to achieve a real acceleration of permitting procedures the European Parliament and Council will have to take precautions that the new rules under the proposed regulation and the existing EU environmental legislation are coherent and do not contradict each other. The RGI commends the European Commission's efforts in this context to ensure "that the objectives of our environmental legislation are complied with"¹, and in particular Commissioner's Oettinger's assurance that "under no circumstances will these measures undermine the EU's legislation in the field of environmental protection". We call on the Parliament and the Council to ensure that any efforts to undermine current standards and

¹ Quotes from Commissioner Oettinger's speech at the signing ceremony for the European Grid Declaration at the European Parliament, November 10 2011.

procedures in environmental protection are unsuccessful. Only this will ensure that PCIs can achieve full public acceptance over time.

2. Public participation and transparency

Early, transparent and sustained information provision and involvement of stakeholders is crucial for the acceptance of grid infrastructure projects. Affected populations must be informed at the earliest possible point in time about prospective and on-going planning procedures, as well as about their rights and opportunities to participate in these. Public consultation must be an on-going process from the early stages of planning through to realisation of a project rather than a one-off effort, and shall be done in a way to avoid unnecessary delays. RGI welcomes the fact that the Commission's proposal shares this general understanding and aims to ensure that PCIs achieve a high level of public acceptance. However, more needs to be done to strengthen commitments to good practice in public participation and in information provision.

Strengthening support to win public acceptance at the project level

The proposal aims to enhance standards for public participation in PCIs and commits the Commission to issue guidance documents on implementing these standards. RGI believes that it is essential that the Regulation goes beyond this and establishes an explicit commitment for the Commission to work towards the continuous development of good practices in transparency and public participation (beyond the production of guidance documents that is already included in the current proposal). This would greatly help to implement the guidelines, continuously improve good practices implementation across Europe and ensure that PCIs become showcases of how to win public acceptance.

Improving participation and transparency in Regional Groups

Experience in RGI shows that early involvement in decisions is a powerful approach to overcome public acceptance issues - decisions perceived to be "taken behind closed doors" tend to lead to concerns and delays at later stages of the process. An important step to ensure public acceptance of PCIs is therefore the consultation of stakeholders from society also in the identification of PCIs in the Regional Groups. RGI calls on the European Parliament and the Council to ensure that organisations such as environmental NGOs and civil society groups have the chance to contribute² fully to the process of identifying PCIs in the regional groups.²

Regulatory acceptance of measures to increase public acceptance

Underlining the central importance of public acceptance for network expansion, it is essential that all regulators in Europe acknowledge the potential extra short-term financial costs linked to increasing public acceptance and minimising environmental impacts, e.g. for avoidance measures, innovative technical solutions, strengthening

²A successful example is the observer status that is granted to NGOs in the OSPAR Convention (for protection of the marine Environment of the North-East Atlantic), which efficiently regulates admission and contribution of NGOs (www.ospar.org, "rules of procedures").

public consultation (in line with European Grid Declaration Principle 3.5 and 3.6). A regulatory framework should be developed that supports the recognition by regulators of such cost incurred.

3. Integrated and anticipative planning of Europe's future transmission system

Europe's power system will see drastic changes in the coming decades. Strong increase in the share of variable renewable electricity will require a stronger grid network, including connection to electricity storage facilities. Given the very long technical lifetime of power transmission infrastructure and the time required to plan, grant permission and build new grids, the traditional ten-year-planning horizon in grid development may have to be prolonged in the future.

Strengthen long term planning in grid development

RGI welcomes the work currently pursued by the Commission, ENTSO-E and ACER to develop power and grid system perspectives beyond the ten-year horizon. Long term planning is especially important to the design of a future grid system to fully integrate renewable energies. This long term perspective is likely to gain significant importance in grid planning in the coming years. The analysis suggested in the current proposal still has a strong focus on the ten-year-development plan, while e.g. ENTSO-E is already today working towards 15-year development plans. RGI calls on the European Parliament and the Council to ensure that a long term perspective (incl. scenarios to 2050) is sufficiently considered in all analysis conducted to identify and select PCIs. All analysis should furthermore build on the EU's long term energy and climate targets, be as transparent as possible and involve relevant stakeholders to ensure support of society for the results.

About RGI

The Renewables-Grid-Initiative brings together non-governmental-organizations and electricity grid operators to support the effective integration of 100% renewable electricity into the grid. RGI was launched in July 2009 by a coalition of Transmission System Operators (TSOs) and Non-Governmental Organizations (NGOs) and has grown to 13 members across Europe today. RGI activities are in support of national and EU authorities' efforts to realise an efficient, sustainable and socially accepted development of the European network infrastructure - for both decentralised and large-scale renewable energies. In November 2011, RGI brought together a coalition of 24 organizations, including 9 of Europe's largest TSOs and NGOs such as WWF, Greenpeace, Birdlife and Friends of the Earth Scotland in signing the "European Grid Declaration on Electricity Network Development and Nature Conservation (www.renewables-grid.eu/uploads/media/European_Grid_Declaration_signed_02.pdf)

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