

## RGI response to European Commission “Consultation on the list of proposed Projects of Common Interest”

The Renewables Grid Initiative (RGI) backs the concept of Projects of Common Interest (PCIs). This EU label should allow highly critical and needed electrical infrastructures to obtain faster permitting procedures, streamlined and improved regulatory conditions and European and potentially national financial support. These better conditions could facilitate a faster deployment of electricity networks to achieve Europe’s objectives for energy security, climate change mitigation and nature conservation.

RGI stresses that speeding up procedures must not undermine environmental and social standards, which have to be respected by each project. RGI acknowledges that early cooperation between relevant stakeholders enhances an environmentally sound and timely implementation of infrastructure. Therefore, the European Commission Regional Groups should systematically and transparently engage local stakeholders about the need of projects as well as about the projects’ potential environmental impacts. The Regional Groups should seek for and make use of relevant stakeholders' knowledge about avoiding impacts.

RGI furthermore points out that the selection of PCIs requires a transparent process and clear outcome to allow all interested stakeholders to understand the rationale, the effects and the characteristics of each of the selected PCI projects, encompassing the aspects related to renewables. Only a more and more transparent and meaningful process can deliver legitimacy and eventually the support of civil society. The European Commission and its Regional Groups should therefore find means to overcome the current high confidentiality of its decision making, with respect to both eligibility of projects for the PCI status and to the final confirmation of PCI status.

RGI believes that a credible and scientifically sound ranking of projects is currently not possible for the lack of comprehensive and consistent quality of data. RGI furthermore fears that such a ranking may be unrealistic over the longer term too and might not be helpful since decisions on the PCI status will continue to be based on a set of different criteria and national interests. RGI therefore finds it necessary to concentrate on increasing the overall transparency of the process and the participation of interested stakeholders instead of focussing too much on developing a scientifically extremely complex and bureaucratic ranking, that is likely to trigger more discussions than to enhance clarity.

Beyond the existing PCI selection criteria set in the TEN-E regulation, RGI furthermore suggests that governance structures under the Energy Union should secure the consideration of :

- the project's potential to reduce a country’s dependence on fossil energy imports
- the contribution to an increase of RES generation in the respective countries or other, better suited countries.

Furthermore, RGI suggests that the PCI selection criteria should take into account the positive impact that these infrastructural projects can have in addressing and eventually overcoming the current economic crisis in the European Member States.

With respect to the consultation here at hand, RGI feels it can be improved as a means to gather relevant knowledge about candidate PCIs from stakeholders by increasing the provided amount of information about the projects. Information available on each project (from the TYNDP) should be made readily accessible via the PCI candidate lists by adding a link from the list to relevant info and maps to help respondents find out more. Ideally, the TYNDP information should be collated for each project and packaged so the case for PCI status is clear.