

RGI's statement on the functioning of the Governance Regulation of the Energy Union and Climate Action

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The Renewables Grid Initiative (RGI) welcomes the opportunity to contribute to the call for evidence on the functioning of the Governance Regulation of the Energy Union and Climate Action ('Governance Regulation').

RGI strongly believes that the Governance Regulation should aim at up to date, robust, timely, transparent and high-quality planning, reporting and monitoring with clear and ambitious short-term (National Energy and Climate Plans) and long-term (national Long-Term Strategies) decarbonisation commitments, that cumulatively achieve the targets and objectives of the European Union (EU). This necessitates plans and strategies to be strengthened in terms of effectiveness and include clarity about timeframes for implementability and enabling schemes, as well as enforcement measures at the EU level. Interlinkages between the different timeframes should be carefully considered and overall aligned with the revision requirements envisaged in the Paris Agreement. Moreover, deadlines and transparency requirements should be respected and enforced. This will allow the national and EU plans and strategies to capture the fast-changing climate, energy and nature policy landscape, respond to crises and reflect ambitious decarbonisation scenarios¹.

The Member States and the European Union at large should consider energy efficiency at the system level. The Russian invasion of Ukraine revealed in the most evident way the depth in scarcity of resources, including space and materials, as well as external dependencies. While phasing out fossil fuels and subsequent subsidies should remain a priority, due attention should be paid to the impacts of different renewable energy sources and their potential to create new lock-ins and dependencies. Energy efficiency is increasingly important, and there is an urgent need to support measures to promote and enable efficiency. In particular, RGI believes that dedicated efforts should be made to achieve efficiency and optimisation at energy system level and not just on the demand side. This implies that energy system efficiency drivers should guide energy scenarios selection as well as energy system and infrastructure planning.

In line with this, the Governance Regulation should recognise the benefits of renewables-based direct electrification as the most cost- and resource-efficient way to decarbonise our economies and societies. This prioritisation should be incorporated and materialised through strong commitments and direct electrification strategies at both, the EU and Member State levels, as well as clear and binding

¹ <https://www.pac-scenarios.eu/>



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progress indicators. Such an approach would entail strengthening the planning, reporting and monitoring of the electricity grid development to integrate renewable energy sources into the energy system within and across Member States. Scaling and speeding up the deployment of electricity grids will require dedicated efforts and financing for stakeholder engagement to win support from local communities, while delivering tangible local benefits.

Moreover, RGI urges the European Commission to increase transparency on the cost of actions and the investments needed to achieve the targets and planned decarbonisation pathways of the Member States. Given the investments and funds required to reach the iterative climate and energy targets and to increase certainty of achieving climate neutrality in the most cost-optimal way, robust data should be made available and assessed with an energy system perspective against clear benchmarks.

A revised Governance Regulation should aim at a holistic approach. Since the adoption of the current Governance Regulation in 2018, a significant amount of policy developments has been introduced in the EU. Noticeably, the Regulation was adopted prior to the European Green Deal, which transformed the policy landscape in Europe. It is therefore essential to further integrate EU planning and improve the quality and effectiveness of decarbonisation trajectories and actions, by jointly tackling the interdependent and mutually reinforcing climate, energy and biodiversity crises, as well as the impacts of climate change. Cross-sectoral synergies and interlinkages, including with nature legislation and spatial planning at seas and on land, should be achieved to ensure that renewable energy generation and electricity grid infrastructure go hand in hand with nature protection and restoration. On that front, the NECPs should be coherent and aligned with existing and upcoming tools such as the Maritime Spatial Plans (MSP) and the upcoming nature restoration plans.

Lastly, RGI believes that the societal aspects of the Governance Regulation should be strengthened. The NECPs and nLTS are transformative in nature. They envisage a pathway and a series of changes that will not only have a direct effect on citizens and their lifestyles but, many times, will also require their direct involvement and action. At the same time, in an environment where societies are facing the pressure of multiple impacts, maintaining robust democratic values is of great importance. Thus, effective communication coupled with granular, early and meaningful stakeholder engagement, including NGOs and the general public, should be central to promote ownership of the plans and strategies, ensure improvements of the final outcome and avoid political backlashes. For this to happen, a proactive approach of the national governments, along with robust enforcement tools at the EU level should safeguard the standards of the Aarhus Convention.



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About RGI

RGI is a unique collaboration of NGOs and TSOs (Transmission System Operators) from across Europe engaging in an 'energy transition ecosystem-of-actors'. We promote fair, transparent, sustainable grid development to enable the growth of renewables to achieve full decarbonisation in line with the Paris Agreement.

RGI Members originate from a variety of European countries, consisting of TSOs from Belgium (Elia), Croatia (HOPS), France (RTE), Germany (50Hertz, Amprion, TenneT and TransnetBW), Ireland (EirGrid), Italy (Terna), the Netherlands (TenneT), Norway (Statnett), Portugal (REN), Spain (Red Eléctrica) and Switzerland (Swissgrid); and the NGOs Bellona Europa, BIOM, BirdLife Europe, Climate Action Network (CAN) Europe, Ember, France Nature Environnement (FNE), Friends of the Earth Ireland, Fundación Renovables, Germanwatch, Legambiente, NABU, Natuur&Milieu, the Royal Society for the Protection of Birds (RSPB), WWF International and ZERO. Europacable and IUCN are Supporting Members.



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