

1. General comments and framework

- The main barriers to a higher share of renewables are not the EU framework as such, but challenges related to national implementation. Fragmented and complex permitting procedures, administrative bottlenecks and inconsistent implementation and application of EU rules at Member State level create delays and uncertainty for project developers. Simplification, clearer implementation guidance and enforcement, in combination with improved coordination at national level would therefore yield substantial results.
- Where gaps or complexity in EU legislation exist, they should be addressed through targeted clarification rather than additional layers of regulation. At the same time, environmental assessments must maintain a high level of quality to avoid public opposition. Simplified procedures for projects with low potential for conflict are preferable to exemptions. A stable, predictable and efficiently implemented framework is essential to mobilise investments at the scale and speed required.
- Renewable self-consumption and energy communities can play a valuable role, but their socio-economic benefits, relevance, scale and system impact differ significantly across Member States. Measures such as EU guidance, exchange of best practices, financing instruments and improved digitalisation can support uptake without undermining system efficiency.
- New binding targets, extensive new rights or additional obligations for system operators should be approached with caution, as they may increase complexity and costs in systems where integration challenges and socio-economic benefits already are significant. The focus should be on flexibility, proportionality and compatibility with overall system needs.
- Public acceptance is essential for timely deployment of renewable energy projects. Experience shows that local opposition is often linked to limited transparency and unclear local benefits. Measures that reduce administrative barriers and strengthen early and meaningful participation are therefore particularly important. Voluntary benefit-sharing and local value creation can contribute positively, provided such measures are flexible and adapted to local conditions.
- At EU level, guidance, exchange of best practice and technical support can improve consistency and trust without increasing regulatory complexity. By contrast, new binding obligations, rigid requirements or extensive non-price criteria risk higher costs, delays and legal uncertainty. The focus should

remain on simplification, predictability and technology-neutral frameworks, while leaving sufficient flexibility for Member States and project developers to design locally appropriate solutions within existing legislation.

- Well functioning markets with price signals should be the main driver also for storage and demand response. Locational signals to be given through prices based on bidding zones.

2. Market design and support schemes

- Through CfDs, the producer has already price-hedged production and will deliver in the spot market. He is price-insensitive and has no incentive to regulate production.
- With investment support and exposure to the power price, hedging contracts in the form of PPAs are more attractive and the need to reduce production at negative prices.
- CfDs reduces incentives to enter into a PPA with the industry. A long-term PPA may be necessary for power-intensive industry.
- New technology-intensive industries like corporate PPAs where power is sourced from a specific source. GoOs are a suitable way to achieve a PPA with a sustainable character.
- To avoid short-term imbalances in the market, it is important that the expansion of renewables takes place in line with the development of demand. We see that this is not the case today with subsidies, negative prices and curtailment in several markets. Regulations should stimulate emissions reductions on the demand side through electrification.

3. Guarantees of origin

- Requirements to use unbundled GoOs only from the same Bidding Zone and from additional production go against the logic of the Internal market, against investment incentives and against incentives for PPAs.
- Restricting GoOs to new assets is highly questionable from a carbon accounting perspective, as older assets produce electricity with the same climate benefit.
- Such limitations would penalise early movers, particularly in regions that have already decarbonised their power systems
- Matching at bidding zone level will punish countries with several internal bidding zones. Fragmentation of the EU/EEA internal market risks it being highly illiquid, particularly in smaller bidding zones, as GoOs would need to

be redeemed within the same zone and time interval. This will again hamper PPAs.

- Granulation of GoOs should happen in the market based on demand and supply.