

Eurogas Amendments to the Proposal for a Directive of the European Parliament & of the Council on the Promotion of the Use of Energy from Renewable Sources (Recast)

New (8)

Commission Proposal	Amendment
(8) The establishment of a Union binding renewable energy target for 2030 would continue to encourage the development of technologies which generate renewable energy and provide certainty for investors. A target defined at the Union level would leave greater flexibility for Member States to meet their greenhouse gas reduction targets in the most cost-effective manner in accordance with their specific circumstances, energy mixes and capacities to produce renewable energy.	(8) The establishment of a Union binding renewable energy target for 2030 would continue to encourage the development of technologies and other solutions which generate renewable energy and provide certainty for investors. A target defined at the Union level would leave greater flexibility for Member States to meet their greenhouse gas reduction targets in the most cost-effective manner in accordance with their specific circumstances, energy mixes and capacities to produce renewable energy.
<u>Justification</u>	
Self-explanatory	

New (16)

Commission Proposal	Amendment
(16) Electricity generation from renewable sources should be deployed at the lowest possible cost for consumers and taxpayers. When designing support schemes and when allocating support, Member States should seek to minimise the overall system cost of deployment, taking full account of grid and system development needs, the resulting energy mix, and the long term potential of technologies.	(16) Electricity generation from renewable sources should be deployed at the lowest possible cost for consumers and taxpayers. When designing support schemes and when allocating support, Member States should seek to minimise the overall system cost of deployment, taking full account of grid and system development needs, the resulting energy mix and CO₂ emissions , and the long term potential of technologies.
<u>Justification</u>	
The increase of variable renewable electricity production should not lead to the simultaneous increase of electricity production of coal.	

New (17)

Commission Proposal	Amendment
(17) The opening of support schemes to cross-border participation limits negative impacts on the internal energy market and can, under certain conditions, help Member States achieve the Union target more cost-efficiently. Cross-border participation is also the natural corollary to the development of the Union renewables policy, with a Union level binding target replacing national binding targets. It is therefore appropriate to require Member States to progressively and partially open support to projects located in other Member States, and define several ways in which such progressive opening may be implemented, ensuring compliance with the provisions of the Treaty, including Articles 30, 34 and 110.	(17) The opening of support schemes to cross-border participation limits negative impacts on the internal energy market and can, under certain conditions, help Member States achieve the Union target more cost-efficiently. Cross-border participation is also the natural corollary to the development of the Union renewables policy, with a Union level binding target replacing national binding targets. It is therefore appropriate to require allow Member States to progressively and partially open support to projects located in other Member States, and define several ways in which such progressive opening may be implemented, ensuring compliance with the provisions of the Treaty, including Articles 30, 34 and 110.
<p style="text-align: center;"><u>Justification</u></p> <p>Maintaining the subsidiary principle, the Member State level is suited for cross-border agreements.</p>	

New (18)

Commission Proposal	Amendment
(18) Without prejudice to adaptations of support schemes to bring them in line with State aid rules, renewables support policies should be stable and avoid frequent changes. Such changes have a direct impact on capital financing costs, the costs of project development and therefore on the overall cost of deploying renewables in the Union. Member States should prevent the revision of any support granted to renewable energy projects from having a negative impact on their economic viability. In this context, Member States should promote cost-effective support policies and ensure their financial sustainability.	(18) Without prejudice to adaptations of support schemes to bring them in line with State aid rules, renewables support policies should be stable and avoid frequent or retroactive changes. Such changes have a direct impact on capital financing costs, the costs of project development and therefore on the overall cost of deploying renewables in the Union. Member States should prevent the revision of any support granted to renewable energy projects from having a negative impact on their economic viability. In this context, Member States should promote cost-effective support policies and ensure their financial sustainability.
<p style="text-align: center;"><u>Justification</u></p> <p>Retroactive changes discourage investment.</p>	

2009/28/EC Recital 36 (adapted)

Commission Proposal	Amendment
<p>To create opportunities for reducing the cost of achieving ☒ meeting ☒ the ☒ Union ☒ targets laid down in this Directive ⇒ and to give flexibility to Member States to comply with their obligation not to go below their 2020 national targets after 2020 ⇐ , it is appropriate both to facilitate the consumption in Member States of energy produced from renewable sources in other Member States, and to enable Member States to count energy from renewable sources consumed in other Member States towards their own ⇒ renewable energy share ⇐ national targets. For this reason, flexibility measures ⇒ cooperation mechanisms ⇐ are required, but they remain under Member States' control in order not to affect their ability to reach their national targets ⇒ to complement the obligations to open up support to projects located in other Member States ⇐ . Those flexibility measures ⇒ mechanisms ⇐ ☒ include ☒ take the form of statistical transfers, joint projects between Member States or joint support schemes.</p>	<p>To create opportunities for reducing the cost of achieving ☒ meeting ☒ the ☒ Union ☒ targets laid down in this Directive ⇒ and to give flexibility to Member States to comply with their obligation not to go below their 2020 national targets after 2020 ⇐ , it is appropriate both to facilitate the consumption in Member States of energy produced from renewable sources in other Member States, and to enable Member States to count energy from renewable sources consumed in other Member States towards their own ⇒ renewable energy share ⇐ national targets. For this reason, flexibility measures ⇒ cooperation mechanisms ⇐ are required, may be required but they remain under Member States' control in order not to affect their ability to reach their national targets ⇒ to complement the obligations possibility to open up support to projects located in other Member States ⇐ . Those flexibility measures ⇒ mechanisms ⇐ ☒ include ☒ take the form of statistical transfers, joint projects between Member States or joint support schemes.</p>
<p style="text-align: center;"><u>Justification</u></p> <p>Maintaining the subsidiary principle, the Member State level is suited for cross-border agreements.</p>	

2009/28/EC Recital 40 (adapted)

Commission Proposal	Amendment
<p>(29) The procedure used by the administration responsible for supervising the authorisation, certification and licensing of renewable energy plants should be objective, transparent, non-discriminatory and proportionate when applying the rules to specific projects. In particular, it is appropriate to avoid any unnecessary burden that could arise by classifying renewable energy projects under installations which represent a high health risk.</p>	<p>(29) The procedure used by the administration responsible for supervising the authorisation, certification and licensing of renewable energy plants should be predictable, objective, transparent, non-discriminatory and proportionate when applying the rules to specific projects. In particular, it is appropriate to avoid any unnecessary burden that could arise by classifying renewable energy projects under installations which represent a high health risk.</p>

<u>Justification</u>
Unpredictability deters investment.

2009/28/EC Recital 47 (adapted)

Commission Proposal	Amendment
(33) At national and regional level, rules and obligations for minimum requirements for the use of energy from renewable sources in new and renovated buildings have led to considerable increases in the use of energy from renewable sources. Those measures should be encouraged in a wider Community Union context, while promoting the use of more energy-efficient applications of energy from renewable sources through building regulations and codes.	(33) At national and regional level, rules and obligations for minimum requirements for the use of energy from renewable sources in new and renovated buildings have led to considerable increases in the use of energy from renewable sources. Those measures should be encouraged in a wider Community Union context, while promoting the use of more cost and energy-efficient applications of energy from renewable sources through building regulations and codes.
<u>Justification</u>	
Self-explanatory.	

2009/28/EC Recital 43 (adapted)

Commission Proposal	Amendment
(39) In order to stimulate facilitate the contribution by ⇒ micro, small and medium-sized enterprises (SMEs) and ⇐ individual citizens to the objectives set out in this Directive, the relevant authorities should consider the possibility of replacing authorisations ⇒ should be replaced ⇐ by simple notifications to the competent body when installing small ⇒ for small renewable energy projects, including ⇐ decentralised ⇒ ones such as rooftop solar installations. Given the increasing need for the repowering of existing renewables plants, accelerated permit granting procedures should be set out ⇐ devices for producing energy from renewable sources.	(39) In order to stimulate facilitate the contribution by ⇒ micro, small and medium-sized enterprises (SMEs) and ⇐ individual citizens to the objectives set out in this Directive, the relevant authorities should consider the possibility of replacing authorisations ⇒ should be replaced ⇐ by simple notifications to the competent body when installing small ⇒ for small renewable energy projects, including ⇐ decentralised ⇒ ones such as rooftop solar installations. Given the increasing need for the repowering of existing renewables plants, accelerated and simplified permit granting procedures should be set out ⇐ devices for producing energy from renewable sources.
<u>Justification</u>	
Self-explanatory.	

2009/28/EC Recital 54 (adapted)

Commission Proposal	Amendment
<p>(45) It is important to provide information on how the supported electricity is allocated to final customers in accordance with Article 3(6) of Directive 2003/54/EC. In order to improve the quality of that information to consumers, in particular as regards the amount of energy from renewable sources produced by new installations, the Commission should assess the effectiveness of the measures taken by Member States ⇒ Member States should ensure that guarantees of origin are issued for all units of renewable energy produced. In addition, with a view to avoiding double compensation, renewable energy producers already receiving financial support should not receive guarantees of origin. However, those guarantees of origin should be used for disclosure so that final consumers can receive clear, reliable and adequate evidence on the renewable origin of the relevant units of energy. Moreover, for electricity that received support, the guarantees of origin should be auctioned to the market and the revenues should be used to reduce public subsidies for renewable energy. ⇐</p>	<p>(45) It is important to provide information on how the supported electricity energy is allocated to final customers in accordance with Article 3(6) of Directive 2003/54/EC. In order to improve the quality of that information to consumers, in particular as regards the amount of energy from renewable sources produced by new installations, the Commission should assess the effectiveness of the measures taken by Member States ⇒ Member States should ensure that guarantees of origin are issued for all units of renewable energy produced. In addition, with a view to avoiding double compensation, renewable energy producers already receiving financial support should not receive guarantees of origin. However, ‡Those guarantees of origin should be used for disclosure so that final consumers can receive clear, reliable and adequate evidence on the renewable origin of the relevant units of energy. Moreover, for electricity renewable energy that received support, the guarantees of origin should may be auctioned to the market and the revenues should be used to reduce public subsidies for renewable energy. ⇐ No measure should be introduced which might have negative retroactive impacts for renewable energy development. Changes to the issuance and marketing of GOs should therefore apply only to new installations after 2021 as to ensure the necessary confidence and contribute to a stable framework.</p>
<p style="text-align: center;"><u>Justification</u></p> <p>This provision should apply to all renewable energy. All renewable installations should be eligible to receive GOs, independently of whether they benefit from a financial support scheme or not.</p>	

2009/28/EC Recital 55

Commission Proposal	Amendment
<p>(46) Directive 2004/8/EC 2012/27/EU of the European Parliament and of the Council of 11 February 2004 on the promotion of cogeneration based on a useful heat demand in the internal energy market provides for guarantees of origin for proving the origin of electricity produced from high-efficiency cogeneration plants. ⇒ However no use is specified for ⇐ such guarantees of origin cannot ⇐, so they should also ⇐ be used when disclosing the use of energy from renewable sources in accordance with Article 3(6) of Directive 2003/54/EC as this might result in double counting and double disclosure. 2012/27/EC on energy efficiency provides for guarantees of origin for proving the origin of electricity produced from high-efficiency cogeneration plants. However no use is specified for such guarantees of origin cannot, so they should also be used when disclosing the use of energy from renewable sources in accordance with Article 3(6) of Directive 2003/54/EC as this might result in double counting and double disclosure ⇒ high efficiency CHP ⇐.</p>	<p>(46) Directive 2004/8/EC 2012/27/EU of the European Parliament and of the Council of 11 February 2004 on the promotion of cogeneration based on a useful heat demand in the internal energy market provides for guarantees of origin to be issued by Member States for proving the origin of electricity produced from high-efficiency cogeneration plants. ⇒ However no use is specified for ⇐ such guarantees of origin cannot ⇐, so they should also ⇐ be issued and used when disclosing the use of energy from renewable sources in accordance with Article 3(6) of Directive 2003/54/EC as this might result in double counting and double disclosure.</p> <p>2012/27/EC on energy efficiency provides for guarantees of origin for proving the origin of electricity produced from high-efficiency cogeneration plants. However no use is specified for such guarantees of origin cannot, so they should also be used when disclosing the use of energy from renewable sources in accordance with Article 3(6) of Directive 2003/54/EC as this might result in double counting and double disclosure ⇒ high efficiency CHP ⇐.</p>
<p style="text-align: center;"><u>Justification</u></p> <p>Notwithstanding the transposition of the Renewable Energy Directive into national law, several Member States do not issue as yet GOs for the electricity produced by highly efficient CHP plants. It should be stressed that these GOs should be issued and made available also to high efficiency CHP electricity producers.</p>	

new (47)

Commission Proposal	Amendment
<p>(47) Guarantees of origin, which are currently in place for renewable electricity and renewable heating and cooling, should be extended to cover renewable gas. This would provide a consistent means of proving to final</p>	<p>(47) Guarantees of origin, which are currently in place for renewable electricity and renewable heating and cooling, should be extended to cover renewable gas. This would provide a consistent means of proving to final</p>

customers the origin of renewable gases such as biomethane and would facilitate greater cross-border trade in such gases. It would also enable the creation of guarantees of origin for other renewable gases such as hydrogen.	customers the origin of renewable gases such as biogas and biomethane and would facilitate greater cross-border trade in such gases. It would also enable the creation of guarantees of origin for other renewable gases such as hydrogen.
<p style="text-align: center;"><u>Justification</u></p> <p>Biogas can be used without first being transformed into biomethane.</p>	

new (53)

Commission Proposal	Amendment
(53) With the growing importance of self consumption of renewable electricity , there is a need for a definition of renewable self-consumers and a regulatory framework which would empower self-consumers to generate, store, consume and sell electricity without facing disproportionate burdens. Collective self-consumption should be allowed in certain cases so that citizens living in apartments for example can benefit from consumer empowerment to the same extent as households in single family homes.	(53) With the growing importance of self consumption of renewable electricity energy , there is a need for a definition of renewable self-consumers and a regulatory framework which would empower self-consumers to generate, store, consume and sell electricity renewable energy without facing disproportionate burdens. Collective self-consumption should be allowed in certain cases so that citizens living in apartments for example can benefit from consumer empowerment to the same extent as households in single family homes.
<p style="text-align: center;"><u>Justification</u></p> <p>This provision should apply to all renewable energy.</p>	

2009/28/EC Recital 62 (adapted)

Commission Proposal	Amendment
(67) The costs of connecting new producers of electricity and gas from renewable energy sources to the electricity and gas grids should be ☒ based on ☒ objective, transparent and non-discriminatory ☒ criteria ☒ and due account should be taken of the benefit that embedded producers of electricity from renewable energy sources and local producers of gas from renewable sources	(67) The costs of connecting new producers of electricity and gas from renewable energy sources to the electricity and gas grids should be ☒ based on ☒ objective, transparent and non-discriminatory ☒ criteria ☒ and due account should be taken of the benefit that embedded producers of electricity from renewable energy sources and local producers of gas from renewable sources

bring to the electricity and gas grids.	bring to the electricity and gas grids, in terms of additional system flexibility & reliability as well as externalities such as improved waste management and local environments.
<p style="text-align: center;"><u>Justification</u></p> <p><i>Benefits of renewable gases go beyond KWh provisions. Waste streams can be used for renewable gas production, which can improve local environmental conditions (air, ground, and water quality), for instance. Gaseous energy also provides energy system reliability because it is storable, and flexibility because it is dispatchable.</i></p>	

2009/28/EC (adapted) Article 1

Commission Proposal	Amendment
<p>This Directive establishes a common framework for the promotion of energy from renewable sources. It sets <input checked="" type="checkbox"/> a binding <input checked="" type="checkbox"/> mandatory national <input checked="" type="checkbox"/> Union <input checked="" type="checkbox"/> targets for the overall share of energy from renewable sources in gross final consumption of energy <input checked="" type="checkbox"/> in 2030 <input checked="" type="checkbox"/> and for the share of energy from renewable sources in transport. It <input checked="" type="checkbox"/> also <input checked="" type="checkbox"/> lays down rules <input checked="" type="checkbox"/> on <input checked="" type="checkbox"/> relating to statistical transfers between Member States, joint projects <input checked="" type="checkbox"/> financial support to electricity produced from renewable sources, self-consumption of renewable electricity, and renewable energy use in the heating and cooling and transport sectors, regional cooperation <input checked="" type="checkbox"/> between Member States and with third countries, guarantees of origin, administrative procedures, <input checked="" type="checkbox"/> and <input checked="" type="checkbox"/> information and training, and access to the electricity grid for energy from renewable sources. It establishes sustainability <input checked="" type="checkbox"/> and greenhouse gas emissions saving <input checked="" type="checkbox"/> criteria for biofuels, and bioliquids <input checked="" type="checkbox"/> and biomass fuels <input checked="" type="checkbox"/>.</p>	<p>This Directive establishes a common framework for the promotion of energy from renewable sources. It sets <input checked="" type="checkbox"/> a binding <input checked="" type="checkbox"/> mandatory national <input checked="" type="checkbox"/> Union <input checked="" type="checkbox"/> targets for the overall share of energy from renewable sources in gross final consumption of energy <input checked="" type="checkbox"/> in 2030 <input checked="" type="checkbox"/> and for the share of energy from renewable sources in transport. It <input checked="" type="checkbox"/> also <input checked="" type="checkbox"/> lays down rules <input checked="" type="checkbox"/> on <input checked="" type="checkbox"/> relating to statistical transfers between Member States, joint projects <input checked="" type="checkbox"/> financial support to electricity produced from renewable sources, self-consumption of renewable sources, and renewable energy use in the heating and cooling and transport sectors, regional cooperation <input checked="" type="checkbox"/> between Member States and with third countries, guarantees of origin, administrative procedures, <input checked="" type="checkbox"/> and <input checked="" type="checkbox"/> information and training, and access to the electricity grid for energy from renewable sources. It establishes sustainability <input checked="" type="checkbox"/> and greenhouse gas emissions saving <input checked="" type="checkbox"/> criteria for biofuels, and bioliquids <input checked="" type="checkbox"/> and biomass fuels <input checked="" type="checkbox"/>.</p>
<p style="text-align: center;"><u>Justification</u></p> <p>This provision should relate to all renewable energy sources.</p>	

Article 2 (a)

Commission Proposal	Amendment
(a) 'energy from renewable sources' means energy from renewable non-fossil sources, namely wind, solar (solar thermal and solar photovoltaic) and geothermal energy, ambient heat, tide, wave and other ocean energy, hydropower, biomass, landfill gas, sewage treatment plant gas and biogases ;	(a) 'energy from renewable sources' means energy from renewable non-fossil sources, namely wind, solar (solar thermal and solar photovoltaic) and geothermal energy, ambient heat, tide, wave and other ocean energy, hydropower, biomass, landfill gas, sewage treatment plant gas and, biogases and other renewable gases (including synthetic gases produced via electrolysis from renewable electricity sources, or from gasification from renewable sources and including bio-methane, upgraded for gas grid injection) ;
<p style="text-align: center;"><u>Justification</u></p> <p>Biogas is generally understood to be of the sort produced by decomposing organic material (anaerobic digestion). However, this understanding is too narrow, as there are different types of production processes and sources of renewable gas.</p>	

2009/28/EC Article 2 (adapted) new (aa)

Commission Proposal	Amendment
(aa) 'renewable self-consumer' means an active customer as defined in Directive [MDI Directive] who consumes and may store and sell renewable electricity which is generated within his or its premises, including a multi-apartment block, a commercial or shared services site or a closed distribution system, provided that, for non-household renewable self-consumers, those activities do not constitute their primary commercial or professional activity;	(aa) 'renewable self-consumer' means an active customer as defined in Directive [MDI Directive] who consumes and may store and sell renewable electricity energy which is generated within his or its premises, including a multi-apartment block, a commercial or shared services site or a closed distribution system, provided that, for non-household renewable self-consumers, those activities do not constitute their primary commercial or professional activity;
<p style="text-align: center;"><u>Justification</u></p> <p>This provision should apply to all renewable energy sources.</p>	

Article 2 (bb)

Commission Proposal	Amendment
(bb) 'renewable self-consumption' means the generation and consumption, and, where applicable, storage, of renewable electricity by renewable self-consumers;	(bb) 'renewable self-consumption' means the generation and consumption, and, where applicable, storage, of renewable electricity energy by renewable self-consumers;
<p style="text-align: center;"><u>Justification</u></p> <p>Prosumers may also produce their own renewable electricity, gas or heat. Renewable self-consumption should be inclusive of all energy vectors.</p>	

Article 2 (qq)

Commission Proposal	Amendment
(qq) 'biogas' means gaseous fuels produced from biomass;	(qq) 'biogas' means gaseous fuels produced from biomass, or from renewably sourced electricity, via electrolysis;
<p style="text-align: center;"><u>Justification</u></p> <p>Biogas is generally understood to be of the sort produced by decomposing organic material (anaerobic digestion). However, this understanding is too narrow, as there are different types of production processes and sources of renewable gas.</p>	

Article 4

Commission Proposal	Amendment
<p><i>Article 4</i></p> <p>Financial support for electricity from renewable sources</p> <p>1. Subject to State aid rules, in order to reach the Union target set in Article 3(1), Member States may apply support schemes. Support schemes for electricity from renewable sources shall be designed so as to avoid unnecessary distortions of electricity markets and ensure that producers take into account the supply and demand of electricity as well as possible grid constraints.</p> <p>2. Support for electricity from renewable sources shall be designed so as to integrate electricity from renewable sources in the electricity market and ensure that renewable energy producers are responding to market price signals and maximise their market</p>	<p><i>Article 4</i></p> <p>Financial support for electricity energy produced from renewable sources</p> <p>1. Subject to State aid rules, in order to reach the Union target set in Article 3(1), Member States may apply support schemes. Support schemes for electricity and gas from renewable sources shall be designed so as to avoid unnecessary distortions of electricity energy markets and ensure that producers take into account the supply and demand of electricity energy as well as possible grid constraints.</p> <p>2. Support for electricity energy from renewable sources shall be designed so as to integrate electricity energy from renewable sources in the electricity energy market and ensure that renewable energy producers are responding to market price signals and</p>

<p>revenues.</p> <p>3. Member States shall ensure that support for renewable electricity is granted in an open, transparent, competitive, non-discriminatory and cost-effective manner.</p> <p>4. Member States shall assess the effectiveness of their support for electricity from renewable sources at least every four years. Decisions on the continuation or prolongation of support and design of new support shall be based on the results of the assessments.</p>	<p>maximise their market revenues.</p> <p>3. Member States shall ensure that support for renewable electricity energy is granted in an open, transparent, competitive, non-discriminatory and cost-effective manner. Technology-specific support mechanisms remain acceptable when justified by the need to achieve technology diversification, to take into account system integration or environmental constraints.</p> <p>4. Member States shall assess the effectiveness of their support for electricity energy from renewable sources at least every four years. Decisions on the continuation or prolongation of support and design of new support shall be based on the results of the assessments.</p>
<p style="text-align: center;"><u>Justification</u></p> <p>Given the immature state of renewable gaseous energy in general (including bio-methane, some gasification technologies, and power-to-gas), support is needed until market-readiness is achieved. Therefore, confining measures that encourage support for electricity alone is deemed too narrow and should therefore be broadened to 'support for renewable energy'. It is of utmost importance to provide more visibility to investors on support scheme design post 2020 and define key principles in the Renewable Energy Directive instead of leaving it up to case-by-case decisions in the context of the State aid approval processes. Most notably, the Renewable Energy Directive should confirm the right of Member States to allocate support using technology-specific approaches in line with the right of Member States to determine their own energy mix anchored in Art. 194 TFEU. This is to allow Member States to take into account that there is no level playing field for different technologies (in terms of taxation, grid cost charging, permitting, etc.) and that the impact of different technologies with regard to system integration cost and externalities is not sufficiently internalised. As a consequence, technology-neutral tendering can result in an undifferentiated renewables mix that is mainly based on one (the cheapest) technology and potentially concentrated in one geographical area, which may cause problems for grid integration and system stability. Obviously, technology-neutral tenders favour least-cost technologies which may prevent more expensive but promising technologies from maturing and realising their cost reduction potential. Allowing for technology-specific tendering should, however, not exempt Member States from improving conditions for competition and creating a level playing field among all technologies.</p>	

Article 5

Commission Proposal	Amendment
<p>Opening of support schemes for renewable electricity</p> <p>1. Member States shall open support for electricity generated from renewable sources to generators located in other Member States under the conditions laid down in this Article.</p> <p>2. Member States shall ensure that support for at least 10% of the newly supported capacity in each year between 2021 and 2025 and at least 15% of the newly supported capacity in each year between 2026 and 2030 is open to installations located in other Member States.</p> <p>3. Support schemes may be opened to cross-border participation through, inter alia, opened tenders, joint tenders, opened certificate schemes or joint support schemes. The allocation of renewable electricity benefiting from support under opened tenders, joint tenders or opened certificate schemes towards Member States respective contributions shall be subject to a cooperation agreement setting out rules for the cross-border disbursement of funding, following the principle that energy should be counted towards the Member State funding the installation.</p> <p>4. The Commission shall assess by 2025 the benefits on the cost-effective deployment of renewable electricity in the Union of provisions set out in this Article. On the basis of this assessment, the Commission may propose to increase the percentages set out in paragraph 2.</p>	<p>Opening of support schemes for renewable electricity energy</p> <p>1. Member States shall may open support for electricity generated from renewable sources to generators located in other Member States under the conditions laid down in this Article.</p> <p>2. Member States shall ensure that support for at least 10% of the newly supported capacity in each year between 2021 and 2025 and at least 15% of the newly supported capacity in each year between 2026 and 2030 is open to installations located in other Member States.</p> <p>3. Support schemes may be opened to cross-border participation through, inter alia, opened tenders, joint tenders, opened certificate schemes or joint support schemes. The allocation of renewable electricity benefiting from support under opened tenders, joint tenders or opened certificate schemes towards Member States respective contributions shall be subject to a cooperation agreement setting out rules for the cross-border disbursement of funding, following the principle that energy should be counted towards the Member State funding the installation. Bilateral cooperation agreements between Member States should set appropriate rules for the disbursement of funding as well as the allocation of other energy associated costs and the capacity target for renewable energy sources that can be accommodated within the system.</p> <p>4. The Commission shall assess by 2025 the benefits on the cost-effective deployment of renewable electricity in the Union of provisions set out in this Article. On the basis of this assessment, the Commission may propose to increase the percentages set out</p>

	in paragraph 2.
<p style="text-align: center;"><u>Justification</u></p> <p>Maintaining the subsidiary principle, the Member State level is suited for cross-border agreements. A more coordinated approach towards renewables deployment across Member States is desirable and cross-border/regional cooperation should be encouraged in order to overcome the fragmentation of the internal market. Nonetheless, opening support schemes carries important challenges related to its concrete implementation: the lack of a level playfield among Member States (related to taxation, grid charges, permitting, spatial planning, etc.), the acceptance of consumers/citizens in one country to finance projects in another country and the risks for smaller countries with limited potential. The Commission should therefore facilitate a voluntary approach, making use of existing cooperation initiatives like the Pentilateral Energy Forum (PLEF) in central-western Europe, etc. A level playing field can be promoted through good practices collected by the Commission.</p>	

Article 5 (new paragraph)

Commission Proposal	Amendment
	5. Member States may be entitled to implement technology-specific mechanisms insofar as technical diversification is expressly needed to meet system needs, or it is not mature enough.
<p style="text-align: center;"><u>Justification</u></p> <p>The principle of ensuring technology diversification should fully apply. In certain cases, the possibility to make a technology-specific call for tender can contribute to the implementation of this principle. Renewable gases, such as biomethane, hydrogen or synthetic methane (e.g. from power-to-gas production), should be regarded as non-mature technologies eligible for support that rewards benefits beyond the units of energy produced, and internalises externalities such as flexible supply, energy storage, waste management, agricultural performance enhancement etc.</p>	

Article 6

Commission Proposal	Amendment
<p>Stability of financial support</p> <p>Without prejudice to adaptations necessary to comply with State aid rules, Member States shall ensure that the level of, and the</p>	<p>Stability of financial support and certification schemes</p> <p>Without prejudice to adaptations necessary, also to comply with State aid rules, Member States shall ensure that the level of, and</p>

conditions attached to the support granted to renewable energy projects are not revised in a way that negatively impacts the rights conferred thereunder and the economics of supported projects.	conditions attached to the support granted to renewable energy projects and to the guarantees of origin system are not revised in a way that negatively impacts the rights conferred thereunder and the economics of supported projects.
<p style="text-align: center;"><u>Justification</u></p> <p>Change to guarantees of origin systems should also avoid detriment to renewable energy projects</p>	

Article 7.1.a.

Commission Proposal	Amendment
(a) gross final consumption of electricity from renewable energy sources;	(a) gross final consumption of electricity energy from renewable energy sources;
<p style="text-align: center;"><u>Justification</u></p> <p>This provision should apply to all renewable energy sources.</p>	

Article 15.1.

Commission Proposal	Amendment
1. Member States shall ensure that any national rules concerning the authorisation, certification and licensing procedures that are applied to plants and associated transmission and distribution network infrastructures for the production of electricity, heating or cooling from renewable energy sources, and to the process of transformation of biomass into biofuels or other energy products, are proportionate and necessary.	1. Member States shall ensure that any national rules concerning the authorisation, certification and licensing procedures that are applied to plants and associated transmission and distribution network infrastructures for the production of electricity, gas , heating or cooling from renewable energy sources, and to the process of transformation of biomass into biofuels or other energy products, are proportionate and necessary.
<p style="text-align: center;"><u>Justification</u></p> <p>There is no reason why renewable gas should not be included in this list.</p>	

Article ~~15~~ 19.1

Commission Proposal	Amendment
<p>Article 15 19</p> <p>Guarantees of origin of electricity, heating and cooling produced from renewable energy sources .</p>	<p>Article 15 19</p> <p>Guarantees of origin of electricity renewable energy, heating and cooling produced from renewable energy sources.</p>
<p>1. For the purposes of proving to final customers the share or quantity of energy from renewable sources in an energy supplier's energy mix⇒ and in the energy supplied to consumers under contracts marketed with reference to the consumption of energy from renewable sources ⇐ in accordance with Article 3(6) of Directive 2003/54/EC, Member States shall ensure that the origin of electricity ⇒ energy ⇐ produced from renewable energy sources can be guaranteed as such within the meaning of this Directive, in accordance with objective, transparent and non-discriminatory criteria.</p>	<p>1. For the purposes of proving to final customers the share or quantity of energy from renewable sources in an energy supplier's energy mix⇒ and in the energy supplied to consumers under contracts marketed with reference to the consumption of energy from renewable sources ⇐ in accordance with Article 3(6) of Directive 2003/54/EC, Member States shall ensure that the origin of electricity ⇒ energy ⇐ units produced from renewable energy sources can be guaranteed as such within the meaning of this Directive, in accordance with objective, transparent and non-discriminatory criteria.</p>
<p style="text-align: center;"><u>Justification</u></p> <p>This provision should apply to all renewable energy sources. The GOs should trace the origin of the renewable energy units produced.</p>	

Article ~~15~~ 19.2

Commission Proposal	Amendment
<p>2. To that end, Member States shall ensure that a guarantee of origin is issued in response to a request from a producer of electricity ⇒ energy ⇐ from renewable energy sources. Member States may arrange for guarantees of origin to be issued ⇐ for non - renewable energy sources. ⇐ in response to a request from producers of heating and cooling from renewable energy sources. Such an arrangement Issuance of guarantees of origin may be made subject to a minimum capacity limit. A guarantee of origin shall be of the standard size of 1 MWh. No more than one guarantee of origin shall be issued in respect of each unit of energy produced.</p>	<p>2. To that end, Member States shall ensure that a guarantee of origin is issued in response to a request from a producer of electricity ⇒ energy ⇐ from renewable energy sources. Member States may arrange for guarantees of origin to be issued ⇐ for non - renewable energy sources. ⇐ in response to a request from producers of heating and cooling from renewable energy sources. Such an arrangement Issuance of guarantees of origin may be made subject to a minimum capacity limit. A guarantee of origin shall be of the standard size of 1 MWh. No more than one guarantee of origin shall be issued in respect of each unit of energy produced.</p>

<p>Member States shall ensure that the same unit of energy from renewable sources is taken into account only once.</p> <p>Member States may provide ⇒ shall ensure ⇐ that no support be granted ⇒ guarantees of origin are issued ⇐ to a producer when that producer receives ⇒ financial support from a support scheme ⇐ a guarantee of origin for the same production of energy from renewable sources.</p> <p>⇒ Member States shall issue such guarantees of origin and transfer them to the market by auctioning them. The revenues raised as a result of the auctioning shall be used to offset the costs of renewables support. ⇐</p> <p>The guarantee of origin shall have no function in terms of a Member State's compliance with Article 3. Transfers of guarantees of origin, separately or together with the physical transfer of energy, shall have no effect on the decision of Member States to use statistical transfers, joint projects or joint support schemes for target compliance or on the calculation of the gross final consumption of energy from renewable sources in accordance with Article 5 7.</p>	<p>Member States shall ensure that the same unit of energy from renewable sources is taken into account only once.</p> <p>Member States may provide ⇒ shall ensure ⇐ that no support be granted ⇒ guarantees of origin are issued ⇐ to a producer when that producer receives ⇒ financial support from a support scheme ⇐ a guarantee of origin for the same production of energy from renewable sources.</p> <p>⇒ Where double compensation could otherwise occur, Member States shall may issue such guarantees of origin and transfer them to the market by auctioning them. The revenues raised as a result of the auctioning shall may be used to offset the costs of renewables support. ⇐</p> <p>Should measures be considered which aim at preventing the same unit of renewable energy produced from receiving both support as well as guarantee of origin issuance, such potential measures should not be applied to existing plants and should only apply to new plants after 2021, to ensure security of investment.</p> <p>The guarantee of origin shall have no function in terms of a Member State's compliance with Article 3. Transfers of guarantees of origin, separately or together with the physical transfer of energy, shall have no effect on the decision of Member States to use statistical transfers, joint projects or joint support schemes for target compliance or on the calculation of the gross final consumption of energy from renewable sources in accordance with Article 5 7.</p>
<p style="text-align: center;"><u>Justification</u></p> <p>The GO should be issued for the unit of energy produced from renewables installations, including electricity produced from biogas and renewable gas injected into the gas grid, independently from the question whether or not an installation is benefitting from a support scheme.</p> <p>Renewable energy producers receiving financial support should be allowed to receive</p>	

Guarantees of Origin, as their purpose is of mere disclosure to their final consumer and their market value is very limited compared with financial support schemes. Member states may decide to detract from the overall financial earmarking for support schemes the auction revenues of GOs or resort to different measures as to offset the overall cost of support schemes.

GOs do not constitute a support mechanism. GOs therefore should be able to be issued, even if the producer is under a support scheme. However, if circumstances should be such that GO issuance would not be permitted under a support scheme, it would create instability to introduce sudden restrictions on GO issuance.

Article 19.9

Commission Proposal	Amendment
<p>9. Member States shall recognise guarantees of origin issued by other Member States in accordance with this Directive exclusively as proof of the elements referred to in paragraph 1 and paragraph 67 (a) to (f). A Member State may refuse to recognise a guarantee of origin only when it has well-founded doubts about its accuracy, reliability or veracity. The Member State shall notify the Commission of such a refusal and its justification.</p> <p>10. If the Commission finds that a refusal to recognise a guarantee of origin is unfounded, the Commission may adopt a decision requiring the Member State in question to recognise it.</p>	<p>9. Member States shall recognise guarantees of origin issued by other Member States in accordance with this Directive exclusively as proof of the elements referred to in paragraph 1 and paragraph 67 (a) to (f). The Commission should promote the full recognition of guarantees of origin between Member States and market participants. A Member State may refuse to recognise a guarantee of origin only when it has well founded doubts about its accuracy, reliability or veracity. The Member State shall notify the Commission of such a refusal and its justification.</p> <p>10. If the Commission finds that a refusal to recognise a guarantee of origin is unfounded, the Commission may adopt a decision requiring the Member State in question to recognise it.</p>
<p style="text-align: center;"><u>Justification</u></p> <p>Promotion of GOs on the part of the EC is encouraged. While it is possible that in some cases GOs would need to be refused by MS, this should remain at their discretion.</p>	

Article 19.10

Commission Proposal	Amendment
10. If the Commission finds that a refusal to recognise a guarantee of origin is unfounded, the Commission may adopt a decision requiring the Member State in question to recognise it.	10. If the Commission finds that a refusal to recognise a guarantee of origin is unfounded, the Commission may adopt a decision requiring the Member State in question to recognise it.
<p style="text-align: center;"><u>Justification</u></p> <p>Promotion of GOs on the part of the EC is encouraged. While it is possible that in some cases GOs would need to be refused by MS, this should remain at their discretion.</p>	

Article 23.1

Commission Proposal	Amendment
1. In order to facilitate the penetration of renewable energy in the heating and cooling sector, each Member State shall endeavour to increase the share of renewable energy supplied for heating and cooling by at least 1 percentage point (pp) every year, expressed in terms of national share of final energy consumption and calculated according to the methodology set out in Article 7.	1. In order to facilitate the penetration of renewable energy in the heating and cooling sector, each Member State shall endeavour to increase the share of renewable energy supplied for heating and cooling by, taking into account early actions, an indicative 1 percentage point (pp) or more every year, expressed in terms of national share of final energy consumption and calculated according to the methodology set out in Article 7.
<p style="text-align: center;"><u>Justification</u></p> <p>An increase in the share of renewable electricity here, in particular through the introduction of binding targets, might come at an unduly decrease in cost-effectiveness, depending on specific contexts both in respect to geography and time (e.g. some advances in heat provision driven by renewables-based gas may provide excellent solutions for areas with harsh winters; if gas is pushed out for expensive electrification, this could cut short opportunities for gas-driven, renewables based solutions in the future).</p>	

Article 26.7

Commission Proposal	Amendment
<p>7. The greenhouse gas emission saving from the use of biofuels, bioliquids and biomass fuels taken into account for the purposes referred to in paragraph 1 shall be:</p> <p>(a) at least 50 % for biofuels and bioliquids produced in installations in operation on or before 5 October 2015;</p> <p>(b) at least 60 % for biofuels and bioliquids produced in installations starting operation from 5 October 2015;</p> <p>(c) at least 70 % for biofuels and bioliquids produced in installations starting operation after 1 January 2021;</p> <p>(d) at least 80 % for electricity, heating and cooling production from biomass fuels used in installations starting operation after 1 January 2021 and 85% for installations starting operation after 1 January 2026.</p> <p>An installation shall be considered to be in operation once the physical production of biofuels or bioliquids and of heating and cooling, and electricity for biomass fuels has started.</p>	<p>7. Where other adequate, seasonal, and renewable energy storage options exist with lower GHG emissions, subject to Member State discretion, the greenhouse gas emission saving from the use of biofuels, bioliquids and biomass fuels taken into account for the purposes referred to in paragraph 1 shall be:</p> <p>(a) at least 50 % for biofuels and bioliquids produced in installations in operation on or before 5 October 2015;</p> <p>(b) at least 60 % for biofuels and bioliquids produced in installations starting operation from 5 October 2015;</p> <p>(c) at least 70 % for biofuels and bioliquids produced in installations starting operation after 1 January 2021;</p> <p>(d) at least 80 % for electricity, heating and cooling production from biomass fuels used in installations starting operation after 1 January 2021 and 85% for installations starting operation after 1 January 2026.</p> <p>An installation shall be considered to be in operation once the physical production of biofuels or bioliquids and of heating and cooling, and electricity for biomass fuels has started.</p>
<p style="text-align: center;"><u>Justification</u></p> <p>In specific contexts biogas can provide system benefits which go well beyond just greenhouse gas emissions reductions such as seasonal renewable energy storage. Yet, if Member States do not have adequate flexibility in terms of GHG reduction requirements, biogas could be pushed out. Overly narrow and stringent GHG requirements in biogas production could have a long-term subversive influence on overall sustainability and affordable decarbonisation of the energy system. Moreover, biogas used in different sectors (transport, heating, etc.)</p>	

should not face different requirements, as benefit is brought to the whole system.

Point b is entirely deleted as it shares the same date as point a.