

## POLICY PAPER

### FROM CLEANENERGYEU TO GREENENERGYEU



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## Introduction

After a 4 500-page package so proudly referred to as “jumbo” and a bittersweet press conference of vice-president Šefčovič and commissioner Arias Canete, it was difficult to follow the media rhythm and to immediately analyse such a voluminous production. We are simply not as good as Lucky Luke to shoot a policy paper faster than our shadow.

Nearly two weeks later, we can confess we still did not find time to read every single recital and every footnote in all annexes but we can give you the bigger picture based on a first rough assessment. Despite some encouraging progress on a number of issues, it won't come as a surprise that we're not quite in line with the Commissioner's statement that this “*very impressive package (...) has cleared the way to a more competitive, modern and cleaner energy system*”.<sup>1</sup> On the contrary we believe that this package is, despite some good elements, falling short of the immense challenge of the energy transition. It even risks to organise a lost decade for Europe. One main reason for that: nothing is planned to phase-out old inflexible power plants. Even worse, conventional assets run by the energy oligopolies receive additional protection.

## 1. And the winner is... energy efficiency!

In a package which is overall disappointing, energy efficiency comes first. And rightly so. The minimum 30% binding is good news, at least in terms of political dynamics. The Commission made a step forward by moving up from the weak 27% of the 2014 European Council conclusions.<sup>2</sup> A 27% target would have drastically reduced the current pace of savings. A 30% is still not in line with the reduction pace up to 2020 but comes closer to it.

	Target	Volume of savings over 10 years (Mtoe)
<b>2020</b>	20%	173
<b>2030</b>	27%	114
	30%	162

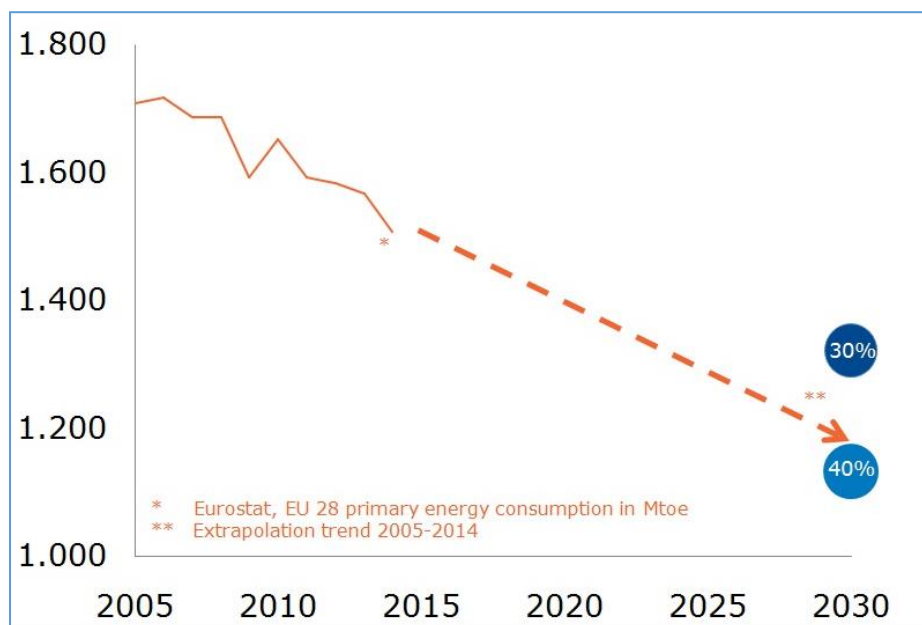
<sup>1</sup> Extracts from the EC press conference.

<sup>2</sup> [http://www.consilium.europa.eu/uedocs/cms\\_data/docs/pressdata/en/ec/145397.pdf](http://www.consilium.europa.eu/uedocs/cms_data/docs/pressdata/en/ec/145397.pdf)

It is of political relevance that the Commission dared to get out of the scope of the European Council by increasing the efficiency target. As a next step, we need to increase the renewable energy target and subsequently the greenhouse gases emissions target, as 40% are not enough to comply with the Paris agreement.

Second good news, the target is “binding”. Again a good political signal, but what does it mean exactly? We still didn’t hear any convincing explanation at this stage. We are glad that president Juncker kept his promise made before the European Parliament on 15 July 2014: “I would also like to significantly enhance energy efficiency beyond the 2020 objective, notably when it comes to buildings, and I am in favour of an ambitious, binding target to this end”.<sup>3</sup>

However, we are still convinced that the position of the European Parliament (40%) is a better option. An increased target could save 225 000 lives due to better air quality and bring 41.5 bn€ additional savings per year. It would also allow Europe to save the equivalent of 5 Nord Stream II pipelines in terms of energy consumption and lift a significant number of households out of energy poverty. In addition, it seems that we are already meeting in 2016 the 20% target by 2020, as figures of the Commission Joint Research Centre are showing.<sup>4</sup> A simple continuation of the current pace would lead us towards a cost-effective 40% reduction as shown in the chart below.



Third good news, the Commission understood the real potential of ecodesign. We all remember the disastrous and populist-friendly quotes of Juncker and Timmermans, claiming that the EU should not regulate “the energy intensity of shower caps”<sup>5</sup> or “the power of the vacuum cleaners”.<sup>6</sup> After years of internal blockage, a new ecodesign work plan for 2017-2019 has been adopted and foresees to extend requirements to a new set of high-potential products such as hand dryers, lifts, electric motors, photovoltaic panels...

<sup>3</sup> [https://ec.europa.eu/priorities/sites/beta-political/files/juncker-political-guidelines-speech\\_en\\_0.pdf](https://ec.europa.eu/priorities/sites/beta-political/files/juncker-political-guidelines-speech_en_0.pdf)

<sup>4</sup> <http://iet.jrc.ec.europa.eu/energyefficiency/node/9145>

<sup>5</sup> <http://juncker.epp.eu/news/new-growth-without-debt-my-priorities-commission-president>

<sup>6</sup> <http://www.nu.nl/politiek/3867581/timmermans-eu-bemoeienis-met-stofzuiger.html>

Finally, we also welcome the dedicated action plan entitled *Accelerating clean energy in buildings* which is proposing an integrated approach on smart financing for smart buildings, together with the necessary technical assistance and financial instruments.

## 2. Renewable energy sources: 27% is not ambitious

Our biggest disappointment lies with renewables. While the vice-president believes that the package is “*creating a new environment for higher penetration of renewables across Europe*”,<sup>7</sup> this assertion is not backed by Commission’s figures. The Commission’s spin doctors tried hard to sell the renewables target as ambitious. But the reality is unfortunately very different. Commission’s calculations result in an expected annual investment of 75 bn€ in the energy area for the 2020-2030 decade, one third of which would be in the sector of renewables, i.e. 25 bn€.

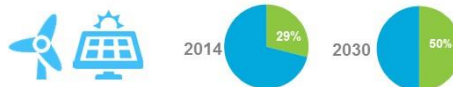
However, as shown by BNEF figures below, investment in renewables has been 68 bn€/year in average over the past decade (2005-2015). In other words, the Commission dares to qualify “*ambitious*” a massive decrease in renewables investment! 25 bn€/year was the level reached in... 2004! In addition, the Commission is expecting 15 bn€/year of investment in fossil fuel technologies by 2030: good news for Eurelectric, EDF and the Magritte Group but certainly not for the planet.

Annual EU investment in RES (bn€/year)	
2005-2015 (actual)	68
2021-2030 (EC proposal)	25

CLEAN ENERGY FOR ALL EUROPEANS

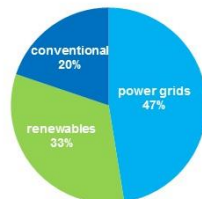
### CONTEXT

#### MORE POWER COMING FROM RENEWABLES

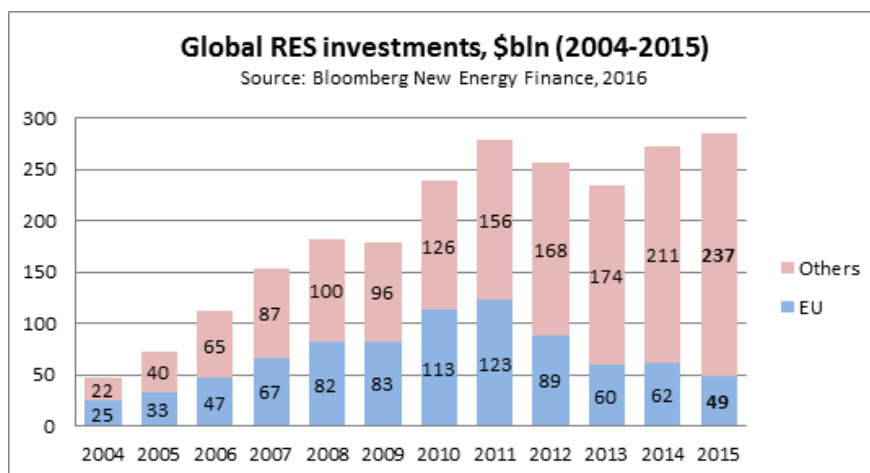


Today up to 90% of variable renewable electricity is connected to distribution grids

#### INVESTMENT NEEDS FOR POWER: €75 bn PER YEAR FOR 2021-2030



<sup>7</sup> Extracts from the EC press conference.



Why is the Commission ending up with the conclusion that 27% renewables is the most cost-effective target? The answer lies with the biased impact assessment. The document which served as a basis for the Commission to craft their proposals is factoring in levelized cost of electricity of 110 to 205 €/MWh for offshore wind and 79 to 148 €/MWh for ground-mounted PV.<sup>8</sup> However the latest auctions for offshore wind in Sweden, Denmark and the Netherlands delivered prices between 50€/MWh and 70 €/MWh. And the latest German/Danish auction for PV ended up with a price of 54 €/MWh just two days before the release of the Winter Package.

Another bias of the impact assessment is the carbon price, estimated by the Commission between 38 and 42 €/ton to justify the removal of priority dispatch and fully expose renewables to the market. Here again the Commission needs a reality check. The carbon price is today around 5€/ton and not a single carbon analyst is predicting high carbon prices as a result of a weak ETS proposal from EU Commission. Removing priority dispatch in a world where the carbon price is so low risks to hinder the development of renewables. This dubious exercise relying on overestimated renewable energy costs and a fanciful carbon price is overall disqualifying the credibility of the whole impact assessments. The Commission needs a reality check!

	EC impact assessment	Reality
Carbon price (€/ton)	38 - 42	5
Offshore wind LCOE (€/MWh)	110 - 205	50 - 70
Ground-mounted PV LCOE (€/MWh)	79 - 148	54

After this biased exercise, the Commission urgently needs to restore its credibility by coming out with an updated impact assessment on renewables, factoring in realistic technological costs and a meaningful carbon price paving the way to a Paris-compatible target-setting as the result of the co-decision process between the Council and the Parliament. Why should Europe slow down renewables when climate scientists tell us that we need to speed up? And why should Europe put at risk its leadership by organising a shrinking home market in a moment when solar and wind have become so cheap?

<sup>8</sup> [http://ec.europa.eu/energy/sites/ener/files/documents/1\\_en\\_impact\\_assessment\\_part1\\_v4\\_418.pdf](http://ec.europa.eu/energy/sites/ener/files/documents/1_en_impact_assessment_part1_v4_418.pdf)

### 3. DG Competition's double standards

#### ***Soft on fossil, blind on nuclear, tough against renewables***

The overall package is removing a number of privileges granted to renewables (priority dispatch, stable support schemes) while not affecting the privileges of fossil and nuclear. This bias is threatening the possibility of having a market-based energy transition. Interestingly, this bias is mainly organised by Commission services in charge of ensuring a fair and undistorted internal market: DG Competition.

Further to a joint attack from DG Comp and the legal service, the common rulebook on support schemes was drastically reduced. Article 4 of the renewables directive shrank to a few general principles. The justification used by DG Comp is that support schemes need to be regularly updated to better match market developments: “provisions on support measures in the directive will hinder adaptations in rapidly evolving markets”. Hence “entrenching compatibility conditions [with State aid] for more than a decade will hamper the Commission's ability to adapt its appreciation”. But on 8 November 2016, two weeks before the adoption of the energy package, DG COMP approved the French capacity market for a duration of... ten years!<sup>9</sup>

- *Why is DG COMP granting green light for public support to fossil fuels for a duration of ten years while refusing to give this visibility to renewables support schemes the renewables directive and forcing Member States to review them every four years?*

#### **Anti-RES propaganda: the THEMA example**

A study from the consultancy THEMA circulated lately in Brussels. The study advocates for a total phasing-out of all support schemes to so-called “mature” renewables and to rely on pure market mechanisms like the EU ETS and the energy-only power market. The results are quite explicitly described: phasing-out support schemes would immediately halt renewables deployment until 2025 and secure additional revenues for existing hydro and nuclear baseload.

*This study was financed by Energy Norway (EnergiNorge), the umbrella organisation of the Norwegian power sector.*

Even worse for a “political Commission” promised by Jean-Claude Juncker is the capacity of DG Comp officials to overrule decisions taken at commissioners' level. Indeed the rulebook was taken out of the directive by the services after it had been agreed between three commissioners.<sup>10</sup> It is a topsy-turvy world! This common rulebook is a key provision underpinning investors' certainty and its removal is a big hit to renewables deployment. DG Comp also imposed the meaningless concept of technology neutrality, in practice preventing governments from optimising their RES portfolio based on sound grid and system planning in order to get the appropriate balance between onshore wind, offshore wind, photovoltaic and cogeneration.

Despite the intentions of Juncker to make his Commission “political”, it seems that such things are not for politicians to decide: the holy market will by nature come up with the ideal energy mix!

- *How can the Commission ensure that the new framework will give most needed investors' certainty while scrapping Member States' ability to organise grid and spatial planning?*

<sup>9</sup> [http://ec.europa.eu/competition/state\\_aid/cases/261326/261326\\_1840296\\_301\\_2.pdf](http://ec.europa.eu/competition/state_aid/cases/261326/261326_1840296_301_2.pdf)

<sup>10</sup> [Euractiv](#), 22 November 2016.

- *Why is the Commission removing priority dispatch to all renewables by capping it to small installations (below 500 kW, progressively reduced to 125 kW) and within the limit of 15% of the mix?*

All energy analysts were curious to understand how the Commission would tackle the weak CO2 price signal (5 €/ton) as the result of a broken ETS system. The promise made back in 2008 that the ETS would gradually replace old inefficient and inflexible coal with new high efficiency and flexible gas already vanished long ago. Even worse, the last few years were record years for lignite and coal based power generation in Europe. Combined to a decreasing energy demand resulting from successful energy efficiency policies, this led to a situation marked by a huge overcapacity, maintaining wholesale electricity price at historically low levels (down from 60-70 €/MWh in 2008 to some 20-30 €/MWh).<sup>11</sup> Hence the cost of renewables support schemes remain high despite massive cost reduction over the past years (see below the example of onshore wind on the German market).

	<b>Power price (€/MWh)</b>	<b>Cost of onshore wind (€/MWh)</b>	<b>Difference assumed by public support (€/MWh)</b>
<b>2008</b>	65	100	35
<b>2016</b>	25	70	45

Rather than fixing the problem by proposing a progressive exit strategy for coal, the proposals from the Commission suggest that the EU is facing power shortage and needs a new subsidy regime for conventional power plants via capacity markets. While renewables are fully exposed to the market, coal and nuclear remain “off-market” thanks to Euratom for the former and capacity markets for the latter. This is not surprising as these were the main political demands of the Magritte Group lately. And they seem pretty successful, as they recognised themselves in April 2015: *“The assessment of the energy industry made two years ago by the Magritte Group is now widely shared. In particular, the European Commission’s strategy on a European Energy Union marks an important step forward in this regard”*.<sup>12</sup> We couldn’t agree more: the Magritte group and EDF were able to impose their views.

- *What will the Commission do on coal and nuclear overcapacity which is distorting the price signal on the internal electricity market?*

### **Coal not exposed to market prices**

Surprisingly, the final report of the sector enquiry on capacity mechanisms is promoting UK or French style of complex and expensive capacity markets while studies show that targeted strategic/network reserves as they have been deployed in Scandinavia for a long time are less market intrusive and cheaper. For example, Energinet evaluated that the Danish model of a strategic reserve ten times less expensive than a fully-fledged market.<sup>13</sup> A reserve is also better for the climate as plants integrated in a strategic reserve are running only a very limited number of hours every year, only when the flexible and interconnected power market cannot meet peak demand. Contrarily, a capacity market results in increasing normal revenues for fossil and nuclear power plants. It seems that the only concern of DG

<sup>11</sup> It has to be noted that these prices increased recently in some price zones such as France, where 18 nuclear reactors were stopped for safety reasons.

<sup>12</sup> <http://www.engie.com/en/journalists/press-releases/magritte-group-european-energy-policy/>

<sup>13</sup> Energinet study [Market Model 2.0](#)

COMP is to ensure a fair rate of return for wrong investment in conventional assets. The report is worrying that investors' return on investment *"may be less problematic where generation with shorter planning and construction times is sufficient to ensure adequacy (for instance, small and highly flexible gas plants in certain areas), but may be more problematic where larger power plants with longer lead times of 10-15 years are required"*.<sup>14</sup> Which plants have a 10-15 years lead time? A guess? Baseload gas CCGT and coal, of course! And these technologies are not compatible with our climate targets.

Fortunately some last-minute adjustments were made in the Winter Package, notably with the introduction for the first time of an emission performance standards. These are good news. Afraid of losing all international credibility, the Commission understood that it had to send a strong message against new coal power plant investment in Europe. By including a 550 gCO<sub>2</sub>/kWh in article 23 of the electricity regulation, the Commission is de facto banning new coal investment in Europe. It is interesting to notice that this emission performance standard never appeared in any of the previous versions of the documents seen over the weeks before their adoption. In the articles dealing with capacity mechanisms, there was a very general place holder between brackets [reference to decarbonisation objectives]. Fortunately, a very strong and effective lobbying of the civil society organisations (notably the award of the "fossil of the day" to the Commission in the middle of the COP 22 conference in Marrakech) pushed the Commission to move forward.

On old coal, the situation is unfortunately not solved. With a flawed ETS, existing coal plants will not be exposed to the market for the next decade. Even worse, they could gain new revenues through the general introduction of capacity mechanisms. Articles 18 and 19 of the regulation are a step in the right direction and should be reinforced by the Parliament and the Council during co-decision. The Parliament needs to keep the line of its resolution on market design adopted in September 2016 (LANGEN report). It is of utmost importance that Member States remove regulatory distortions, enable shortage pricing, and develop interconnection, energy storage, demand side measures and energy efficiency before they introduce capacity mechanisms. It is also a fundamental progress to propose a harmonised European resource adequacy assessment factoring in different generation and consumption patterns in a regional context.

We believe that a dynamic intraday market is producing scarcity prices, therefore triggering the right investment. In this respect, there are good elements in the package in favour of more reactive markets (articles 6 and 7 of the market design regulation) and of demand-response and developing aggregators' business model (articles 13 and 17 of the electricity directive), notably the provisions calling to end the compensation from aggregators to suppliers and removing the necessary consent of the final customer's supplier.

- *Why does DG Comp persist in recommending expensive and market-intrusive capacity markets while strategic reserves can be cheaper and more limited in scope?*
- *Why was the French capacity market approved by DG Comp for a duration of ten years just a few weeks before the Winter Package?*

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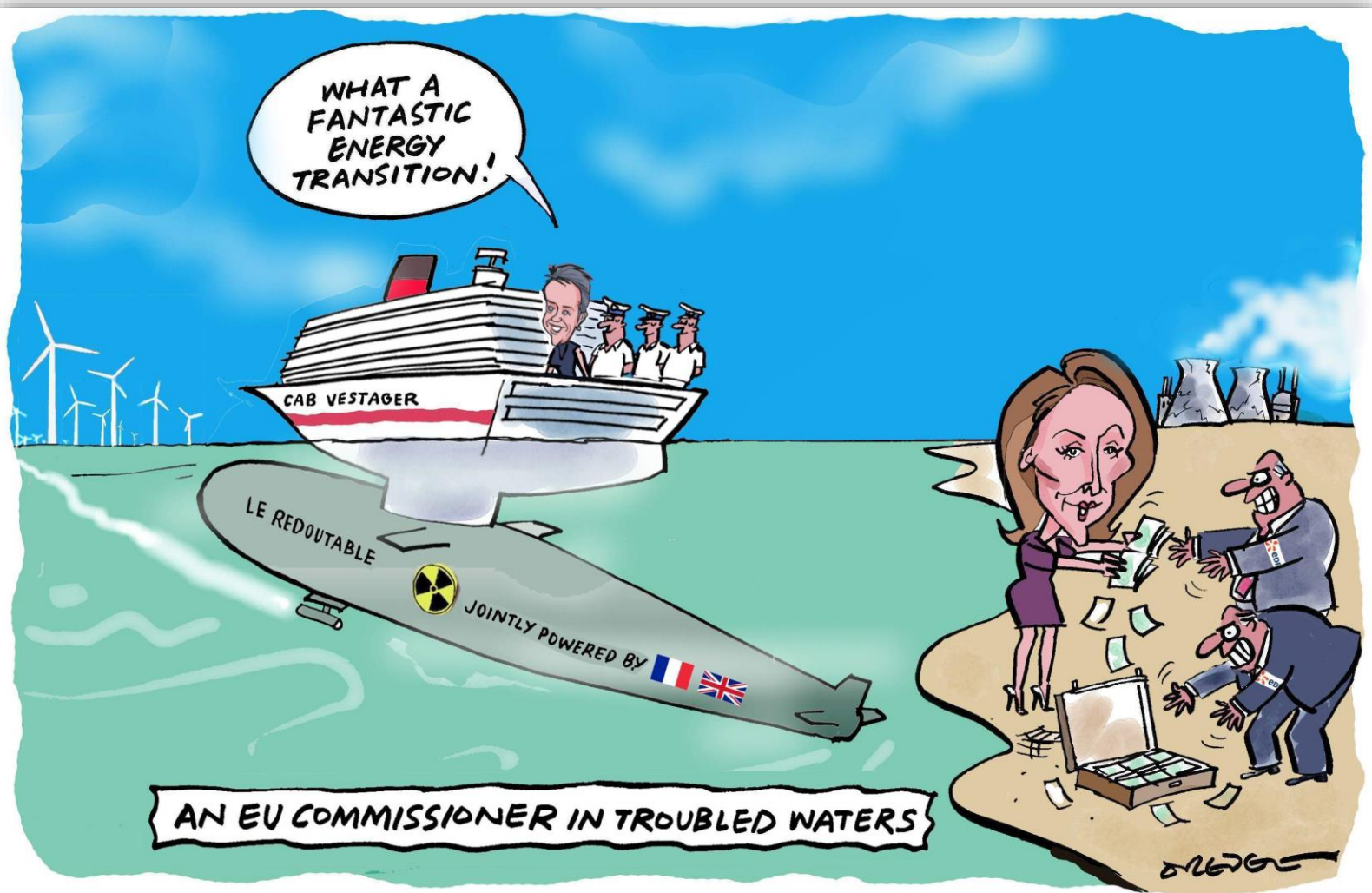
<sup>14</sup> [http://ec.europa.eu/competition/sectors/energy/capacity\\_mechanism\\_swd\\_en.pdf](http://ec.europa.eu/competition/sectors/energy/capacity_mechanism_swd_en.pdf)



### **The nuclear free-ride**

In the press room of the Berlaymont, all of us expected commissioner Vestager to show up, as the result of the sector enquiry on capacity mechanisms is part of the Winter Package. Why was she absent? Maybe she was preparing her hearing in the French Parliament which took place the day after. This hearing was crucial to re-assure French authorities that she will continue to treat nuclear energy in a special way, a way that allows this energy source to benefit from a total free-ride regarding the internal market rules. She conveniently hid behind the Euratom treaty, telling parliamentarians *"If there are questions about [the use of nuclear energy] then we need to think about reforming the Euratom Treaty"*. Her statement is in line with her letter addressed to MEPs in July this year. Thanks to Euratom, *"the Commission cannot question why other technologies [are] not chosen"* and *"if Member States choose to invest in nuclear energy, the Euratom's objective to facilitate that investment becomes an objective of common interest"*.

Is Commissioner Vestager aware of the fact that her services are driving her towards troubled waters?





DG Comp's interpretation of the Euratom treaty is a very convenient excuse not to address the outstanding privileges of nuclear: no liability regime, no segregated funds for waste management, disproportionate public subsidies for early closures, disproportionate public subsidies for new built. Speaking of new built, we don't understand why the current Commission keeps showing empathy and solidarity with the absurd green light to Hinkley Point C given by the previous Commission. The decision is challenged because it did not taken into account the whole massive State aid offered by the French government to the French nuclear sector (Areva and EDF) so that they could be exempted from any risk related to the HPC project. As the decision is challenged before the European Court of Justice, political interest and legal wisdom would call for halting new decisions to be taken before the court's ruling. We are especially concerned about the Paks case under scrutiny by DG Comp. The Commission is said to soon close the investigation and offer a sumptuous Christmas gift to Viktor Orban and Vladimir Putin. In addition, one of the key structuring element of the internal market was silently removed in the Winter Package. Article 8 of the electricity directive, which was making it mandatory for Member States to provide new capacity through a tendering procedure, disappeared! By coincidence, this happens a week after this very provision could have stopped the nuclear project in Paks. Indeed the Hungarian government failed to issue a public procurement and entered directly into negotiations with the Russian nuclear company Rosatom. Fortunately for the nuclear lobby, the Commission lifted their reservations about the absence of a tendering procedure, arguing that "*technological specificities*" allowed the Hungarian government not to comply with these provisions. But in order to be safe, it was better for the nuclear lobby to scrap down the provision itself. It is outrageous that the Commission is fully exposing renewables to the market by forcing auctions to grant public support, while at the same time tendering for conventional capacity is not any more an obligation!

#### German rule of law v. French roulette

The German constitutional court ruled last week that nuclear operator's compensation claims for the early closure of their assets were excessive and that the decision of the government was legitimate. In France, Minister Royal indicated her intention to compensate EDF for the early closure of Fessenheim with 461 million euros, on top of which a yearly fee would be paid until 2041. Le "*casse du siècle*" for EDF and its two reactors located at Fessenheim which are anyway condemned to close for safety reasons. With this methodology, the total amount for the French nuclear fleet would be up to some 120 billion euros! This compensation scheme was notified to DG Comp. Strangely, the point was not raised by commissioner Vestager when she was in Paris...

While being in Paris, commissioner Vestager demonstrated a very dogmatic attitude against the renewal of exploitation permits for hydroelectric plants. Dismantling an effective solidarity model in French valleys is probably the best recipe to feed a strong anti-EU feeling amongst local population. It is also a poor strategy to pretend to be tough against EDF and scrutinize the French power market, while remaining totally blind to the privileges granted to nearly 80% of the electricity mix: nuclear. The French nuclear sector (EDF and Areva) is benefitting from massive public support: non-perception of the annual dividend, recapitalisation, covering the debt inherited by the Olkiluoto disaster, under-calculation of the decommissioning costs. And, cherry on the cake, a possible 120 billion euro gift from the

government to EDF to compensate for early closure of some reactors, in case the Fessenheim methodology was applied to the whole fleet. Is it more citizens-oriented to destroy decades of energy solidarity in French valleys rather than to protect taxpayers from the nuclear "hold-up"?

Contrary to what commissioner Oettinger promised after Fukushima, the Commission didn't propose in the Winter Package to harmonise the nuclear third-party liability regime applicable in case of accident. The Japanese authorities admitted last week that the overall cost of the Fukushima catastrophe would amount to some 170 billion euros, paid by Japanese taxpayers as the operator TEPCO is bankrupt. It means the consequences of a potential nuclear accident in Europe will be paid by taxpayers. Why is DG Comp refusing to address this massive state aid?

Same goes with the missing decommissioning funds. DG Comp remains blind to the absence of a European methodology to calculate the cost of decommissioning and waste management. Why are decommissioning costs estimated to 300 million euro in France and 1 billion euros in Germany for a similar types of reactor? This question remains unanswered and is casting shadow over the fairness of the internal market.

If the Juncker Commission follows the new doctrine that nuclear is completely outside the internal market because of the Euratom Treaty, they risk to be perceived as a pro-nuclear Commission. We acknowledge the fact that the choice to use or not nuclear technology is a national decision as per article 194.2 of the Treaty. However, this choice shall be fully compliant with the rules of the internal market and with the polluter-payer principle.

- *The ECJ ruling is fundamental because it will decide whether a Treaty from 1957 (Euratom) prevails or not over a Treaty concluded fifty years later in 2007 (Lisbon Treaty). Why is the Juncker Commission refusing to wait for the ECJ ruling on the Hinkley Point C case before deciding on other nuclear State aid issues?*
- *Why is the Commission not investigating the massive State aid granted by the French government to the nuclear sector (EDF and Areva) to allow them completing the Hinkley Point C project?*
- *Why is tendering for new capacity mandatory in the case of renewables but not required in the case of nuclear?*
- *What will the Commission do to expose nuclear to the market the same way renewables are exposed (third-party liability regime, meaningful decommissioning and waste management cost)?*

#### 4. Reasons for hope: local energy communities

In this gloomy landscape, there is at least some sunshine: energy citizens! The package is setting the right framework to promote self-generation either individually or collectively in cooperatives through the rights to generate, consume, store and sell electricity. It is made clear that member States shall not impose any burden against self-consumption. Article 15 of the electricity directive is a real step forward in this respect. After a long hesitation, the Commission understood the need to protect energy citizens by granting priority dispatch to small installations, turning "may" into a "shall" in article 11. But then why capping the size and volume of installations who could benefit from it? Vice-president Šefčovič opened his press conference on 30 November by saying "*I am glad to announce that this morning the Commission decided to give priority dispatch to clean energy for all Europeans*". Later during his speech he added "*the package's logic is in its comprehensiveness and it therefore makes no sense to take specific articles out of their context*". And indeed not looking at actual articles is the best way to hide the fact

that priority dispatch is, if not entirely removed, critically limited by a double cap: the size of the installations (500 KW progressively reduced to 125 MW) and a total limit of 15% of the installed capacity.

The development of energy citizens is undoubtedly requiring a significant change at distribution level. However it is also highly questionable to establish a new pan-European DSO body in charge of drafting network codes knowing that most of them are still subsidiaries of integrated companies operating a very large conventional fleet.

- *How does the Commission intend to develop local energy community while capping priority dispatch to very small generation units?*
- *Why is the Commission not addressing the issue of ownership unbundling of DSOs in a world where 70% of them are still owned by utilities?*

## 5. Conclusion: going beyond legislation, a new enabling environment for renewables

The Winter Package includes some encouraging elements and notably:

- ✓ A binding 30% target for energy efficiency
- ✓ Demand-side management, storage and flexibility at the core of the new market
- ✓ A new drive for energy citizens
- ✓ The possible ban of new coal plants via an emission performance standard
- ✓ Non-residential buildings as an innovation platform for automation
- ✓ A strong call for innovation
- ✓ A possible ban on co-firing of coal and biomass

However this package displays very negative elements hindering an accelerated energy transition:

- ✗ A weak renewables target for 2030 and a weak governance system
- ✗ A planned reduction of the investment in renewables
- ✗ A double cap (volume-based and size-based) on priority dispatch
- ✗ A very narrow definition of local energy communities
- ✗ The absence of concrete measures to phase-out coal
- ✗ A new subsidy regime for fossil fuels via capacity mechanisms
- ✗ A complete free-ride for nuclear, not even mentioned once in the legislations

But the energy transition is overall not just about legislations. Although we will mobilise progressive MEPs and Member States to maintain the good provisions of the package and improve the weak ones, we more than ever need to promote a positive green vision based on enabling policies. If we succeed in that, the appetite for more renewables will naturally follow. We regret that the Commission missed an opportunity to give guidance. Hence it is up to the co-legislators to set a vision and create a level-playing field on the electricity market. For that, we need frank and open debates on difficult issues such as a fair transition to phase-out coal together with some concrete projects demonstrating the EU added value to citizens all over Europe. This could be achieved via the following:

- Building on the latest figures of the Joint Research Centre, better study the advantages of a **40% energy efficiency target** in terms of jobs and growth, alleviation of energy poverty, reduction of geopolitical dependency.

- Prepare enhanced cooperation between Member States at **macro-regional level** via the realisation of solid studies modelling high renewables / high efficiency scenarios with credible technological and carbon cost for the following macro-regions: Baltic region, North Sea region, South-Eastern Europe (including non EU Member States from Western Balkans), Central-Western Europe, Mediterranean area (including Northern Africa). Such studies should cover grid planning, market coupling, converging support for renewables, and joint organisation of security of supply issues. These detailed studies would give Member States and stakeholders a solid basis to move beyond the 27% target thanks to cross-border optimisation.
- Concrete **renewables flagships projects of common interest**. Alongside projects of common interests (PCIs) only dealing with interconnectors, the Commission should identify a few large-scale projects of EU interest, for example: offshore wind in the North Sea, offshore wind in the Baltic Sea going together with the desynchronisation from Russia of the Baltic power system and the fuel switch from fossil to renewables of district heating systems, electro-mobility, technical assistance and aggregated platforms to finance the renovation of the building stock. These projects of common interests should be financed by the EFSI 2.0, by structural funds and if necessary by new dedicated vehicles to lower their capital costs.
- Organise a **phase-out of the coal overcapacity** notably by promoting a regional carbon floor price which would have four positive effects: shift from coal to gas; reduced spread between power prices and the cost of renewables; cheaper transition towards zero-carbon buildings; income generation for public finance. This should also take place in the framework of a just transition strategy to progressively move out of the unsustainable coal overcapacity while protecting the long-term interest of the workforce. This could take the shape of a network of experts in post-coal transition, building on best practices identified from the experiences conducted in Wales or the Ruhr region.
- Put an **end to the nuclear free-ride** by fully exposing nuclear energy to the market by adopting a harmonised liability regime and making sure that the “missing money” is actually integrated into power prices and not covered by taxpayers.

While MEPs and the Council will be working hard to improve the Commission’s proposals over the next two year, the Commission should on its side progress on these enabling policies. Let’s move together from #CleanEnergyEU to #GreenEnergyEU!

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