

CONSULTATION ON STREAMLINING OF PLANNING AND REPORTING OBLIGATIONS AS PART OF THE ENERGY UNION GOVERNANCE

Fields marked with * are mandatory.

What this consultation is about

The Commission's State of the Energy Union presented on 18 November 2015 states that "[t]he Energy Union needs a reliable and transparent governance process, anchored in legislation, to make sure that energy-related actions at European, regional, national and local level all contribute to the Energy Union's objectives." This corresponds to similar calls from the European Council and the European Parliament[*].

The State of the Energy Union also underlines that "[i]ntegrated national energy and climate plans, addressing all five dimensions of the Energy Union, are necessary tools to have more strategic planning", and that "[i]n order to track progress, a transparent monitoring system needs to be put in place based on key indicators as well as on Member States' biannual reports concerning progress made on their national plans". This builds further on the Commission's Communication on the Energy Union from February 2015, which explained that a purpose of the governance process for the Energy Union is to "streamline current planning and reporting requirements, avoiding unnecessary administrative burden".

In this context, the present consultation seeks stakeholders' views on current planning and reporting arrangements in the energy field, and on how these could be improved to better serve the objectives of the Energy Union and to reduce administrative burden. An overview of existing planning and reporting obligations in the energy sector concerning the Member States as well as the Commission is available here: [COM planning and reporting obligations \(energy field\)](#); [MS planning and reporting obligations \(energy field\)](#); [COM planning and reporting obligations \(climate field\)](#); [MS planning and reporting obligations \(climate field\)](#).

The responses to the public consultation will feed into the Commission's evaluation and fitness check of existing planning and reporting obligations (a REFIT initiative in the Commission's 2015 Work Programme) as well as into the Impact Assessment for the Commission's proposal(s) for streamlining of planning and reporting in the energy field foreseen for late 2016, as announced by the State of the Energy Union.

The consultation as well as the initiatives it will contribute to should be understood in the broader context of the Energy Union strategy; the Commission's guidance to Member States on national plans from 18 November 2015, and the Council's Conclusions on Energy Union governance from 26 November 2015 – which underscore the need for holistic national plans that address all five dimensions of the Energy Union in an integrated way.

This public consultation also relates to the preparation of other initiatives to implement the Energy Union foreseen for 2016 (notably initiatives on energy efficiency, renewable energy and electricity market design). For other completed and ongoing public consultation processes and their outcomes, see: <http://ec.europa.eu/energy/en/consultations>.

[*] REF to EUCO October 2014 and March 2015; EP 15 Dec 2015.

The questionnaire is structured as follows:

- A. Respondent's profile
- B. Evaluation of existing planning obligations
- C. Evaluation of existing reporting obligations
- D. Options for streamlining planning and reporting obligations
- E. Options for the governance of the Energy Union

Questions marked with an asterisk (*) are mandatory.

*

A. Respondent's profile

Please provide information to help us build your profile as a respondent. In accordance with Regulation 45/2001[*], all personal data collected through this survey will be kept securely and will ultimately be destroyed.

[*] Regulation (EC) No 45/2001 of the European Parliament and of the Council of 18 December 2000 on the protection of individuals with regard to the processing of personal data by the Community institutions and bodies and on the free movement of such data, OJ L 008, 12.1.2001, p.1.

A.1 Are you answering as an individual or on behalf of an organisation/institution?

- ☐ I am answering as an individual.
- ☒ I am answering on behalf of an organisation.

A.2 Please specify your main field of activity.

Please tick the appropriate field. Only one choice is possible:

- ☐ Individual citizen
- ☒ National public authority (central or local government)
- ☐ Private company/ Industry association
- ☐ International organisation
- ☐ Workers' organisation/trade union
- ☐ Research organisation/university
- ☐ NGO
- ☐ Other interest group organisation/association

Other - please specify:

*

A.3. Please indicate your country of residence/establishment:

If answering as an individual, please provide your country of residence.

If answering on behalf of an organisation/institution, please provide the country of establishment of the organisation/institution.

Please tick the appropriate field, only one choice is possible.

- ☐ Austria
- ☐ Belgium
- ☐ Bulgaria
- ☐ Croatia
- ☐ Cyprus
- ☐ Czech Republic
- ☐ Denmark
- ☐ Estonia
- ☐ Finland
- ☐ France
- ☐ Germany
- ☐ Greece
- ☐ Hungary
- ☐ Iceland
- ☐ Ireland
- ☐ Italy
- ☐ Latvia
- ☐ Liechtenstein
- ☐ Lithuania
- ☐ Luxembourg
- ☐ Malta
- ☒ Netherlands
- ☐ Norway
- ☐ Poland
- ☐ Portugal
- ☐ Romania
- ☐ Slovenia
- ☐ Spain
- ☐ Sweden
- ☐ Slovakia
- ☐ Switzerland
- ☐ United Kingdom

Other/international - please specify:

*

A.4 Name and contact details

- ☐ I prefer to provide a general comment only. Please provide your general comment in the box below. (up to 2000 characters)
- ☒ I will provide my name and contact details in the boxes below.

[Questionnaire ends here]

Name:

Organisation (*where applicable*):

Netherlands Ministry of Economic Affairs coordinating with Ministry of
Infrastructure and Environment

Address:

Bezuidenhoutseweg 73, Den Haag

ID from the Interest Representative Register[*] (*where applicable*):

Telephone:

Email:

[*] In the interest of transparency, organisations (including, for example, NGOs, trade associations and commercial enterprises) are invited to provide the public with relevant information about themselves by registering in the Interest Representative Register and subscribing to its Code of Conduct. If you are a registered organisation, please indicate the name and address of your organisation and your Register ID number on the first page of your contribution. Your contribution will then be considered as representing the views of your organisation.

*

A.5 Received contributions may be published on the Commission's website, with the identity of the contributor. Which publication arrangement would you agree upon?

- ☐ My contribution may be published under the name indicated.
- ☐ My contribution may be published but shall be kept anonymous.
- ☒ I do not agree that my contribution will be published.

B. Evaluation of planning obligations

Existing obligations

The EU energy and climate legislation includes a number of different planning obligations for the Member States. Planning obligations play a crucial role for EU energy policies in e.g. the fields of renewable energy, energy efficiency, security of gas supply, energy performance of buildings, waste management and decarbonisation. The main features of existing planning obligations can be summarised as follows:

- Current planning obligations usually include indicators and projections as an analytical basis as well as policies and measures needed to achieve the plan's objectives;
- Current plans usually cover a specific area of the energy or climate field, but do not necessarily refer to possible overlaps and interactions with other plans in these fields; in some cases templates are provided, which can be either voluntary or compulsory;
- Plans often have to be submitted once, but in many cases a periodical revision or the submission of new plans is required. The process for the adoption of the plans is often left to the discretion of the Member States;
- The role of the Commission varies. In some cases, it monitors plans, in other cases, it analyses plans and is requested to report to the European Parliament and the Council. In some instances the Commission could ask for modifications. Furthermore, it can use its enforcement powers, if the planning obligations are not fulfilled or not all the necessary details/content were provided.

1) How would you rate the following aspects of such planning obligations at EU level?

| | Very important | Important | Less important | Not important | No opinion |
|--|-----------------------|-----------------------|-----------------------|-----------------------|-----------------------|
| Coherence of national plans among all EU Member States | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Effective and efficient implementation of EU legislation in the energy and climate field | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Achievement of the EU energy and climate objectives | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Increased certainty for investors across all EU Member States stimulating economic growth as well as research, innovation and competitiveness of the EU | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Better implementation of international commitments by the EU as a whole and by Member States (e.g. concerning the reduction of greenhouse gas emissions) | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| The Commission is better enabled to provide substantial and useful advice | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |

If other, please explain: (up to 1000 characters)

2) Are you aware of overlaps or inconsistencies among the existing planning obligations in the same or different areas of the energy and climate acquis? Please provide examples. (up to 1000 characters)

Energy and greenhouse gas projections and air pollutant emission projections are not always based on consistent methodologies, knowledge base and assumptions. This occurs despite the fact that current guidelines ask for consistency between these type of projections. As there are significant interactions between the expected development of current fossil based energy systems into low carbon energy systems and air pollutant emissions, consistent projections for energy, climate and air pollution are necessary. There are also considerable overlaps in information provided for PAM's and NEEAP's.

3) a) Which of the current planning obligations could in your opinion be streamlined[*] into one integrated plan and why? (up to 1500 characters)

Planning obligations under the EED and RES should be integrated in the National Climate and Energy Plans for the 2021-2030 period. The national plans should not become an extra layer of planning obligations. Streamlining will reduce the administrative burden, increase consistency and ensure that these obligations are an integral part of the strategic planning and important for the political dialogue in the context of the Energy Union. Specific obligations for the EED and RED:

- EED: art. 4 separate strategy for the renovation of buildings (art 4).
- EED: art. 24. the NEEAP is a duplication of work given that the Netherlands has its own national reporting system, the National Energy Outlook (NEV). The planning of energy efficiency policies should be integral part of the national climate and energy plan.
- RED: art. 4. NREAP art

b) Are there any planning obligations that should be kept separate from the integrated plan? (up to 1500 characters)

Existing planning obligations under the MMR should be maintained. Especially adaptation (MMR article 15) and the climate related financial and technology support to developing countries (MMR article 16)

Emergency planning in the context of security of supply could also be maintained separately.

c) Are there any planning obligations that could be repealed? (up to 1500 characters)

EED art 14 on CHP: assessment of potential for efficient CHP and heating and cooling distribution networks. Reporting on CHP should depend on the importance of CHP in the MS strategy and policies.

[*] By streamlining we understand the possibility to integrate planning and reporting obligations resulting from (different) sectorial legislation by reducing possible duplications or gaps in the reporting and planning obligations, thereby ensuring transparency, coherence, relevance, efficiency and effectiveness of the reporting and planning. Furthermore planning and reporting cycles should be harmonised to the extent possible.

4) Which elements/articles of the current planning obligations in the field of renewable energy do you consider indispensable and why? If relevant please, refer to specific Articles of the Renewable Energy Directive. (up to 1000 characters)

With the introduction of the national climate- and energy plans all planning obligations in the RED (NREAP) are obsolete and can be included in the national energy and climate plans. (see answer 3a)

5) Which elements/articles of the current planning obligations in the field of energy efficiency do you consider indispensable and why? Please, if relevant, refer to specific Articles of the Energy Efficiency Directive and Energy Performance of Buildings Directive. (up to 1000 characters)

With the introduction of the national climate- and energy plans all planning obligations in the EED (EED: art. 4, art. 24/ NEEAP) should be integrated in the national energy and climate plans as much as possible. (see answer 3a)

6) Which elements/articles of the current planning in the field of low-carbon development strategies do you consider indispensable and why? (up to 1000 characters)

The linkage to the UNFCCC reporting, as indicated in article 4 and 13 (1b) MMR, is important. A separate update for EU (more frequent and a separate format) is not necessary, the UNFCCC reporting could be leading in this and could be integrated in the national plans (e.g. Paris Agreement article 4 para 19).

7) Which elements/articles of the current planning obligations in the field of infrastructure development (like for example TEN-E) do you consider indispensable and why? (up to 1000 characters)

8) Which elements/articles of other existing planning obligations in the field of energy, including on security of supply, infrastructure and market integration do you consider indispensable and why? (up to 1000 characters)

9) Can you provide qualitative or quantitative evidence on the administrative burden on Member States and other stakeholders resulting from planning obligations at EU level? (up to 1000 characters; a possibility to upload further evidence is provided at the end of the questionnaire)

Future obligations

10) What level of importance do you attach to future planning obligations for Member States in the following key elements of the Energy Union Strategy?

| | Very important | Important | Less important | Not important | No opinion |
|---|-----------------------|-----------------------|-----------------------|-----------------------|-----------------------|
| Security of supply | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Internal Energy Market | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Energy infrastructure | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Energy efficiency | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Renewable energy | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| GHG emissions reduction (decarbonisation) | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Research, Innovation and competitiveness | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |

C. Evaluation of reporting obligations

Existing obligations

In the energy and climate field there are a number reporting obligations for the Member States and for the Commission. These have been developed to cover specific elements of the Energy Union, with less focus on integrated planning and reporting. Both the Member States and the Commission have to abide to reporting obligations. Usually, the information collected through Member States' reports is used by the Commission to assess trends in the climate and energy sectors, assess progress towards certain policy objectives, to monitor implementation and to propose policy and legislative reforms. Importantly, there are several different types of reporting obligations. The following distinctions are useful for the purpose of evaluating them:

- Reporting obligations can be regular or irregular. The former are fulfilled periodically; the latter usually once or after a specific request.
- The content of the reporting obligations may be specified in EU legislation, but the level of detail varies from one sector to another.
- Templates used to respond to reporting obligations are sometimes compulsory. In other cases, they have a voluntary nature.
- Reporting obligations are set up according to the information needs of each area of the energy field linked to the specific requirement of the objective of the initiative. Only in some cases they are coordinated with reporting obligations in other areas.

11) How would you rate the following aspects of reporting obligations in EU legislation?

| | Very important | Important | Less important | Not important | No opinion |
|--|-----------------------|-----------------------|-----------------------|-----------------------|-----------------------|
| Coherence of reporting formats among all EU Member States | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Possibility to monitor the performance and trends (and put in place corrective measures if the results are lagging behind) | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |

| | | | | | |
|---|-----------------------|-----------------------|-----------------------|-----------------------|-----------------------|
| Effective and efficient implementation of EU legislation in the energy and climate field | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Assess progress to targets at Member State level and enable aggregation of data at EU level | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Better comparability of data from different Member States enabling an informed evaluation | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Increased certainty for investors across all EU Member States stimulating economic growth as well as research, innovation and competitiveness of the EU | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| EU as a whole and Member States themselves are better informed on the actual performance and it provides ground for further action | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |

If other, please explain: (up to 1000 characters)

12) Are you aware of overlaps or inconsistencies among the existing reporting obligations in the same or different areas of the energy acquis? Please provide examples. (up to 1000 characters)

The timing of reporting on energy, greenhouse gas emissions and air pollutant emission projections should be harmonized. When it comes to the PAM's and the NEEAP timing is inconsistent.

13) a) Which of the current reporting obligations could in your opinion be streamlined[*] into one integrated report and why? (up to 1500 characters)

The Netherlands suggests to streamline most reporting obligations within the five dimensions of the Energy Union, and especially under the EED and RES, and incorporating them in the biennial reports on the national action plans for the 2021-2030 period. This will reduce the administrative burden, increase consistency and ensure that these obligations are integral part of the political dialogue in the context of the Energy Union.

b) Are there reporting obligations that should be kept separate from the integrated report? (up to 1500 characters)

Adaptation (MMR article 15) and the climate related financial and technology support to developing countries (MMR article 16).

c) Are there reporting obligations that could be repealed? (up to 1500 characters)

MMR: reporting under art 7 k, 7l and 7m can be repealed. These reports on various cross checks with other reporting obligations can be considered as part of the MS QAQC but it is not necessary as a separate reporting obligation.

It could be considered to repeal MMR reporting under art 17 (the use of auctioning revenues)

The annual reporting of indicators in Annex III of the MMR can be repealed.

EED CHP: In general reporting on CHP should depend on the importance of CHP in the MS strategy and policies.

EED CHP Specific reporting in the energy efficiency directive is too detailed: e.g. both a break down into low and high efficiency installations and also a break down into installations with high and low primary energy savings.

EED CHP reporting in the energy efficiency directive: Calculations of primary energy saving contains arbitrary elements and gives a lot of freedom to member states. Consequently, results have limited meaning. Would be good to restrict the data reporting to actual fuel use and actual energy production per type of installation.

EED asks for data on district cooling (article 24 (6)). District contributes very little to the overall goals of energy saving so this obligation should be repealed.

RED directive: article 22.1(n): information on how the renewable share of waste was determined: this is an element of quality reporting of energy statistics and should be covered by Eurostat in balance with reporting on other quality aspects of energy statistics.

[*] By streamlining we understand the possibility to integrate planning and reporting obligations resulting from different sectorial legislation by reducing possible duplication or gaps in the reporting and planning obligations, thereby ensuring transparency, coherence, relevance, efficiency and effectiveness of the reporting and planning. Furthermore planning and reporting cycles should be harmonised to the extent possible.

14) Which elements/articles of the current reporting obligations in the field of renewable energy do you consider indispensable and why? Please, if relevant, refer to specific articles of the Renewable Energy Directive. (up to 1000 characters)

Crucial element of the reporting is the reference to energy statistics (article 5.7). This ensures that maximal use is made of existing data collection with Eurostat/IEA quality checks, with harmonised results and 20 years of experience. This helps to reduce the additional burden for companies, citizens and administration as much as possible. Also the common "language" of energy statistics provides a coherent framework to describe and additional data demands if needed.

Another crucial element is article 5.1 preventing double counting the same amount of energy.

15) Which elements/articles of the current reporting obligations in the field of energy efficiency do you consider indispensable and why? Please, if relevant, refer to specific articles of the Energy Efficiency Directive, the Energy Performance of Buildings Directive and the legislation on products. (up to 1000 characters)

See answer 13a.

16) Which elements/articles of the current reporting in the field of low-carbon development strategies do you consider indispensable and why? (up to 1000 characters)

The linkage to the UNFCCC reporting, as indicated in article 4 and 13 (1b) MMR, is important. A separate update for EU (more frequent and a separate format) is not necessary, the UNFCCC reporting could be leading in this and could be integrated in the national plans (e.g. Paris Agreement article 4 para 19). The low carbon development strategy as part of the national climate and energy plans should be integrated and linked to the 5 dimensions of all five dimensions of the national plans.

17) Which elements/articles of the current reporting obligations in the field of infrastructure development (like for example TEN-E) do you consider indispensable and why? (up to 1000 characters)

The notification to the Commission of investment projects in energy infrastructure (council regulation 256/2014 (com(2009))) is important. In order to reduce the administrative burden of monitoring and reporting on member states, The Netherlands would like to suggest that the Commission, in close collaboration with ENTSO-E, ENTSO-G and ACER, investigates how the necessary data can be made available in the most efficient way.

18) Which other reporting obligations in the field of energy, including on security of supply infrastructure and market integration, do you consider indispensable and why? (up to 1000 characters)

With regards to the monitoring of the security of supply of electricity (directive 2009/72/EC) and natural gas (directive 2009/73/EC) member states are under the obligation to report to the Commission on amongst others the balance of supply and demand on the national market, planned capacity, quality and level of maintenance of the networks etc. The Netherlands would like to suggest to review this obligation in the light of the data and information gathered and provided by the TSO's (ENTSO-E) and ACER and in the light of the upcoming 'winter package', and for natural gas specifically the gas security regulation and look for possibilities to streamline data gathering and reporting processes in line with the biennial reporting on the national plans.

19) Which elements of the current reporting obligations in the field of energy research and innovation do you consider indispensable (investments in R&I, R&I funding programmes and projects and direct funding to institutions) and which information is publicly available or reported to other organisations? How can this reporting be made more consistent between Member States and more updated so that it can support more transnational cooperation in this field? (up to 1000 characters)

The Netherlands is currently not aware of any reporting obligations in the field of energy research and innovation except for the usual obligation to report aid (state aid) under commission regulation 651/2014.

Innovation is important for the cost effective transition to a low carbon economy. The Netherlands suggests for the biennial reporting on the national plans to not only report on public financing , but also on private financing, the sectoral breakdown of patent applications. This could clarify in which sectors investment in innovation is on course or lagging behind. The Commission might consider reporting on output i.e. additional renewable energy and energy savings or a cost reduction through innovation and on cooperation among innovators and PPP's. However this should not lead to additional administrative burdens.

P.S.: Reliable data from private investors remains a difficulty because R&D data remains a sensitive issue form the perspective of competitiveness.

20) Can you provide qualitative or quantitative evidence on the administrative burden imposed by existing reporting obligations on both Member States and other stakeholders? (up to 1000 characters, a possibility to upload further evidence is provided at the end of the questionnaire)

Future obligations

21) Do you consider future reporting obligations for Member States in the following key elements of the Energy Union Strategy to be?

| | Very important | Important | Less important | Not important | No opinion |
|---|-----------------------|-----------------------|-----------------------|-----------------------|-----------------------|
| Security of supply | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Internal Energy Market | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Energy infrastructure | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Energy efficiency | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Renewable energy | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| GHG emissions reduction (decarbonisation) | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Research, Innovation and competitiveness | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |

D. Options for streamlining planning and reporting obligations

This part of the consultation seeks stakeholders' views on the options for the design of the planning and reporting obligations in the new governance system.

22) Do you agree that a comprehensive new legislative act covering both planning and reporting obligations of policy areas related to the Energy Union including the 2030 Energy and Climate framework would ensure consistency and reduce unnecessary administrative burden?



















- ☐ YES
- ☐ NO
- ☐ No Opinion

23) Do you think that non-legislative approaches (e.g. guidance to Member States) can assure effective and efficient streamlining of planning and reporting obligations and would provide the necessary certainty for investors?

- ☐ YES
- ☐ NO
- ☐ No Opinion

24) Concerning options to streamline planning and reporting obligations in the framework of the governance of the Energy Union, how would "Non-binding guidance for both planning and reporting obligations covering all Energy Union dimensions" influence the following categories?

| | Considerable Improvement | Improvement | No Change | Deterioration | Significant deterioration | No Opinion |
|--|--------------------------|-----------------------|-----------------------|-----------------------|---------------------------|-----------------------|
| Coherence of national plans and reporting formats among all EU Member States | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Effective and efficient implementation of EU legislation in the energy and climate field | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |

| | | | | | | |
|---|---|---|---|---|---|---|
| Achievement of the EU energy and climate objectives |  |  |  |  |  |  |
| Possibility to monitor the performance and trends (and put in place corrective measures if the results are lagging behind) |  |  |  |  |  |  |
| Increased certainty for investors across all EU Member States stimulating economic growth as well as research, innovation and competitiveness of the EU |  |  |  |  |  |  |

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|---|--|--|--|--|--|--|
| <p>Better implementation of international commitments by the EU as a whole and by Member States (e.g. concerning the reduction of greenhouse gas emissions)</p> | | | | | | |
| <p>The Commission is better enabled to provide substantial and useful advice and ensure uniform application of EU legislation</p> | | | | | | |

25) Concerning options to streamline planning and reporting obligations in the framework of the governance of the Energy Union, how would "Regulating planning and reporting obligations in sectorial legislation as currently the case" influence the following categories?

| | Considerable Improvement | Improvement | No Change | Deterioration | Significant deterioration | No Opinion |
|--|--------------------------|-----------------------|-----------------------|-----------------------|---------------------------|-----------------------|
| Coherence of national plans and reporting formats among all EU Member States | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Effective and efficient implementation of EU legislation in the energy and climate field | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Achievement of the EU energy and climate objectives | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |

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|---|--|--|--|--|--|--|
| Possibility to monitor the performance and trends (and put in place corrective measures if the results are lagging behind) | | | | | | |
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| Increased certainty for investors across all EU Member States stimulating economic growth as well as research, innovation and competitiveness of the EU | | | | | | |

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|---|--|--|--|--|--|--|
| <p>Better implementation of international commitments by the EU as a whole and by Member States (e.g. concerning the reduction of greenhouse gas emissions)</p> | | | | | | |
| <p>The Commission is better enabled to provide substantial and useful advice and ensure uniform application of EU legislation</p> | | | | | | |

26) Concerning options to streamline planning and reporting obligations in the framework of the governance of the Energy Union, how would "Regulating both planning and reporting obligations by a new comprehensive legislative act covering all Energy Union dimensions" influence the following categories?

| | Considerable Improvement | Improvement | No Change | Deterioration | Significant deterioration | No Opinion |
|--|--------------------------|-----------------------|-----------------------|-----------------------|---------------------------|-----------------------|
| Coherence of national plans and reporting formats among all EU Member States | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Effective and efficient implementation of EU legislation in the energy and climate field | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |

| | | | | | | |
|---|-----------------------|-----------------------|-----------------------|-----------------------|-----------------------|-----------------------|
| Achievement of the EU energy and climate objectives | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Possibility to monitor the performance and trends (and put in place corrective measures if the results are lagging behind) | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Increased certainty for investors across all EU Member States stimulating economic growth as well as research, innovation and competitiveness of the EU | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |

27) In your view, what should be the nature of the initiative to best streamline the planning and reporting obligations in the framework of the governance of the Energy Union?

- ☐ Non-binding guidance for both planning and reporting obligations covering all Energy Union dimensions
- ☐ Regulating planning and reporting obligations in sectorial legislation as currently the case
- ☐ Regulating both planning and reporting obligations by a new comprehensive legislative act covering all Energy Union dimensions

If other, please elaborate: (up to 1000 characters)

See answer 28

28) Please elaborate on the reasons justifying your choice in the previous question: (up to 1000 characters)

The Netherlands see several benefits of a comprehensive legislative act for the governance of the Energy Union. A legislative act could improve:

1. national planning efforts,
2. regional cooperation,
3. consistency of monitoring and reporting
4. data collection.

However, a new legislative act should be in line with the council conclusions on the governance of the Energy Union meaning that the governance provides sufficient national flexibility (national policy measures and choices) and will take into account the different nature and scope of binding, EU-binding or indicative 2030 climate and energy targets. In addition a new legislative act and the decision making process should lead to reduction of administrative burden and not to an increase of specific reporting and indicators.

E. Options for the governance system of the Energy Union and its process

E.1 Scope and nature of the integrated national climate and energy plans

National plans should take a holistic approach and address the five dimensions of the Energy Union in an integrated way recognising the interactions between different dimensions. The nation plans should cover the period from 2021 to 2030 and build upon what each Member State should deliver in relation to their policies for 2020 and also include a perspective until 2050. These national plans should provide long term predictability and certainty for investment and ensure greater cooperation and coherence among Member States' approaches on climate and energy policies.

29) Notwithstanding the fact that all five dimensions will be part of the National Energy and Climate plans, which elements of the Energy Union Strategy should be given prominence?

| | Very important | Important | Less important | Not important | No opinion |
|---|-----------------------|-----------------------|-----------------------|-----------------------|-----------------------|
| Security of supply | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Internal Energy Market | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Energy infrastructure | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Energy efficiency | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Renewable energy | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| GHG emissions reduction (decarbonisation) | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Research, Innovation and competitiveness | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |

30) a) Building further on your replies to the sections devoted to the existing planning and reporting obligations (questions 1-21), which of the areas/articles subject to current planning obligations should be included in the integrated National Energy and Climate Plans? Please explain. (up to 1500 characters)

All planning obligations under the EED (NEEAP, EED art 4 renovation of buildings) and RES (NREAP) should be streamlined by incorporating them as much as possible in the National Climate and Energy Plans for the 2021-2030 period. This will reduce the administrative burden, increase consistency and ensure that these obligations are integral part of the political dialogue in the context of the Energy Union.

- b) Building further on your replies to the sections devoted to the existing planning and reporting obligations (questions 1-21), which of the areas/articles subject to current reporting obligations should also be included in the integrated National Energy and Climate Plans? Please explain. (up to 1500 characters)**

Most reporting obligations within the five dimensions of the Energy Union, and especially under the EED and RES, should be streamlined by incorporating them as much as possible in the National Climate and Energy Plans for the 2021-2030 period. This will reduce the administrative burden, increase consistency and ensure that these obligations are integral part of the political dialogue in the context of the Energy Union.

- c) Are there current planning obligations that should continue to be treated separately? (up to 1500 characters)**

- 31) What political process would be necessary to ensure the stability of the National Energy and Climate Plans (e.g. approval by national governments, cross-party approval, approval by national parliaments, or national legislative acts)? (up to 1000 characters)**

- 32) What, in your opinion, would be the main factors that could justify an update of the National Energy and Climate Plans in the period from 2021 to 2030 (e.g. energy market developments, economic changes, evolving EU legislation, or collective progress made towards the Energy Union objectives)? (up to 1000 characters)**

Energy market developments including innovation, major policy changes and collective progress made towards the Energy Union objectives

E.2 Role of different institutions in the governance process

33) How relevant would you rate the role of different institutions in the development of integrated National Energy and Climate Plans?

| | Very relevant | Relevant | Less relevant | Not relevant | No opinion |
|--|-----------------------|-----------------------|-----------------------|-----------------------|-----------------------|
| European Commission | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| European Parliament | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| European Council | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Energy Council | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Environment Council | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| National administration | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| National parliaments | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| National stakeholders | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Neighbouring or other group of Member States | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Regional fora | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |

34) How relevant would you rate the role of different institutions in the monitoring of the implementation of integrated National Energy and Climate Plans

| | Very relevant | Relevant | Less relevant | Not relevant | No opinion |
|--|-----------------------|-----------------------|-----------------------|-----------------------|-----------------------|
| European Commission | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| European Parliament | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| European Council | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Energy Council | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Environment Council | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| National administration | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| National parliaments | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| National stakeholders | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Neighbouring or other group of Member States | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Regional fora | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |

35) With respect to the National Energy and Climate Plans, what should be the role of the European Commission in order to ensure the achievement of the Energy Union's objectives?

| | Very relevant | Relevant | Less relevant | Not relevant | No opinion |
|---|-----------------------|-----------------------|-----------------------|-----------------------|-----------------------|
| Support to Member States in developing national plans, notably by providing templates and technical support and disseminating best practice | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Review national plans and analyse Member States' contributions | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Issue policy recommendations, notably in its annual State of the Energy Union | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Approve national plans | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Propose measures on EU level in view of delivering on the objectives of the Energy Union | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |

E.3 Regional cooperation to establish, and peer review before finalisation of, integrated climate and energy plans

36) In accordance with the conclusions of October 2014 and March 2015 European Councils, the new governance system should facilitate the coordination of national energy policies and foster regional cooperation. How important would you rate regional cooperation in the course of integrated climate and energy plans?

| | Very important | Important | Less important | Not important | No opinion |
|---|----------------------------------|----------------------------------|----------------------------------|-----------------------|-----------------------|
| As part of their national integrated plans Member States should jointly develop regional objectives, standards and common coherent strategies on the relevant dimensions of the Energy Union. | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| The national plans should describe how they reflect regional integration and cooperation on the Energy Union domains. | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Member States should consult relevant other Member States on national plans before their submission. | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| The plans should provide clear account of these consultations and how they are incorporated in the plans. | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| The Commission should guide the process, and develop appropriate fora for consultations of draft plans and regional cooperation where required. | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> |

37) Concerning consultations and mutual reviews of the integrated National Energy and Climate Plans (meaning that plans or progress reports of one Member State being reviewed by other Member States), how important would you rate the following options?

| | Very important | Important | Less important | Not important | No opinion |
|--|-----------------------|-----------------------|-----------------------|-----------------------|-----------------------|
| Only consultations should take place in the preparation of the plans leading to the draft plans | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Mutual reviews should be done on draft plans | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Mutual reviews should be also used for progress reports assessing the implementation of plans | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Mutual reviews should be of voluntary nature for Member States | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Mutual reviews should be mandatory for Member States | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| A dedicated system of mutual reviews should be established including the creation of adequate fora | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |

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Thank you for your participation!

Contact

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