

# 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.

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## 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:

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[\*] 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.

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**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 checked="" 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 checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Achievement of the EU energy and climate objectives	<input checked="" 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 checked="" 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 checked="" 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 checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

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

Consolidating the current patchwork of planning requirements presents an opportunity to strengthen the effectiveness and transparency of the EU's climate and energy (C&E) governance regime, and will be a key means by which Member States (MS) can be held accountable.

But while there are potential opportunities in streamlining, if excessive or poorly designed, a streamlined planning process could compromise the EU's ability to ensure delivery its objectives. Thus far, the Commission is proposing a process of developing National Energy Climate Plans (NECPs) outside of a binding legal framework. This may severely compromise the ability to collect data to verify MS' contributions, and thus to achieve (C&E) targets.

To ensure comparability, transparency for investors, and the achievement of common objectives, the planning process must conform to principles of good governance, and in particular be rooted in a legislative and binding framework - including a mandatory and detailed template.

The authority on planning procedures is enshrined in national legislation and often embedded in the specific tissue between local, regional and national responsibility. To harmonise the whole planning procedure would legally not be possible on EU level. Rather than that, the Commission must continue also under a new directives for 2030 to oblige Member States to adapt the infrastructure for the new energy world of flexible demand and supply and to sanction any misuse of planning which discriminates e.g. new renewable energy plants.

**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)**

The Climate and Energy Framework for 2020 to 2030 and the Energy Union strategy will be the main elements for the energy system reform, and the Commission aims to reduce administrative burden for member states by streamlining planning and reporting requirements. The current planning and reporting (P&R) regime imposes overlapping and unaligned timetables, thus creating unnecessary burden. There is also a discrepancy between weak and strong planning elements, which has implications on the Commission's ability to ensure and enforce a credible planning process:

- Planning under the Energy Efficiency Directive (EED) is useful in being required every three years but lacks a binding template to ensure consistency and has resulted in inconsistent and weak NEEAPs

- Planning under the Effort Sharing Decision (ESD) is weak as it does not contain a strong planning focus and is more about reporting on policies, measures, and projections.

There is an overlap between the Directives on Security of Electricity Supply and on Internal Electricity Market. Both require transmission system operators to produce grid investment plans, even if with different time horizons. These laws do not mandate the use of specific policy scenarios and assumptions, which may lead to inconsistencies. The TYNDP is partially based on ENTSO-E own made policy scenarios instead of on EU official policy targets and trajectories. With increasing capability for system inherent balancing the role of the DSO level and of private and industry prosumers is not respected in the TYNDP.

ENTSO-E and national TSOs produce system adequacy plans in compliance with these two different Directives. Underlying assumptions and calculation methods consequently differ resulting in inconsistent and expensive scenarios.

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

The existing instruments (RED, EED and ESD) contain the building blocks of robust governance of the 2020 targets. The European Commission has a clear mandate from the European Council to create a credible post 2020 governance regime building on these blocks. This means that Europe must maintain and improve the already existing building blocks enshrined in these instruments. Revising them, as opposed to drafting a new instrument from scratch, would put pressure on the legislators to maintain a maximum of ambition and would reduce the risk of losing valuable information.

A potential way of revising planning and reporting obligations could be a modular approach, where governments would produce a high-level plan outlining their overarching vision for energy and climate policy - anchored in a long-term strategy for 2050, while leaving the details in the sectorial legislation.

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

Integrating high level P&R obligations into one streamlined document will not replace the need for separate P&R instruments. Certain aspects of the current planning regime that will be vital for different sectors must be maintained in separate EU Directives.

For example, increased renewables and energy efficiency levels will require more dedicated P&R to describe how measures will be implemented as the penetration of both increases in the energy system. Likewise, some obligations (e.g. relating to security of supply and infrastructure planning) can hardly be streamlined into an integrated plan, if at all.

Similarly, where all targets are to be planned for together, this could potentially reduce the focus on achieving the binding targets and the effectiveness of the Energy Union governance could be reduced and planning provisions diminished to the lowest common denominator. Moreover, maintaining distinct and robust planning obligations sends a strong signal to investors and wider stakeholders and provides a basis for ensuring transparency, proper monitoring and accountability.

Clarity and coherence between sectoral and integrated P&R must be ensured (e.g. through cross-reference to the NECPs). Bearing in mind that a number of EU Directives will be revised in 2016, it will be crucial to have the entire post-2020 regime decided simultaneously in order to ensure consistency between all P&R elements (ad-hoc sectoral and high level P&R).

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

Streamlining should not be used as an excuse to weaken MS oversight. An excessive emphasis on streamlining and flexible P&R could indeed weaken monitoring and accountability, compromising the EU's ability to ensure delivery of the 2030 targets and Energy Union objectives.

In essence, a single, excessively streamlined report would lack detail and comprehensiveness, diminishing the level of clarity and detail, and hence the usefulness of P&R in providing transparency and investor confidence.

This risk must be balanced by ensuring that vital P&R for different sectors are maintained in binding legislation to ensure essential content is captured. Therefore, rather than being repealed, planning lines that relate to the implementation of provisions anchored in sector-specific legislation should stay in relevant Directives. This will enable the Commission to properly exercise its monitoring and enforcement duties.

[\*] 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)**

A number of planning provisions should be kept in a revised RED as they are solely dedicated to the promotion of renewable energy, this includes planning obligations:

- for particular actors such as network operators
- on the removal of administrative barriers for renewables
- strict maintenance of obligation for priority access and priority dispatch for renewable energies

Furthermore, maintaining specified trajectories for MS will be necessary in helping system operators plan for necessary infrastructure investments.

There is also a need for new and technical planning obligations (e.g. obligation placed on NRAs, TSOs, and DSOs to plan how they intend to better integrate and enhance flexibility into their systems). In their NECPs, MS also need to transparently elaborate how they will promote participation of prosumers in the achievement of renewable energy objectives (e.g. individual household consumers, community projects, multi-dwelling buildings, etc.).

**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)**

All current planning and reporting obligations should be retained and strengthened. Plans should also contain medium and long-term (2030 and 2050) renovation targets. They should more than today show how Member States gradually smarten their building stock, turning buildings into active elements of the energy system. They should show how the uptake of enablers such as demand response, storage and on-site renewables is assured. In particular, they should describe how a minimum on-site RES target (to be set by the revised Energy Efficiency Directive) will be met. The Member States should be obliged to encourage the local administrative level to condition authorisation of building modernisation requirements away from incumbent use of e.g. mineral oil for heating and strict application of efficiency targets, combined with access to public funding for private and SME. A guideline with good practices should be issued by the EU Commission.

**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)**

Low-carbon development strategies should clearly describe how Member States intend to achieve the GHG emissions reduction target for 2030, taking into account, inter alia, the renewable energy contribution. These strategies should also contain an indication of the Member States' contribution to the agreed 80-95% GHG emissions EU reduction target by 2050. In addition, in these documents there should be a detailed plan for the incremental phase-out of fossil fuel subsidies as well as an exhaustive plan for the gradual retirement of coal power stations. Similarly, they should identify the expected evolution of the share of nuclear power. Moreover, these documents should provide a clear indication of how ETS flexibility funds will be used. ETS funds should be made available only to Member States that are on track with the projected increase in RES and EE and decrease in GHG emissions and with the roadmaps for the phase-out of fossil fuel subsidies and for the withdrawal from coal.

**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)**

Long-term infrastructure planning at national, regional and EU level must be maintained and reinforced to ensure that the power grid is prepared for challenges associated with the energy transition. Specifically, TSOs need to take energy efficiency, demand response and interconnection fully into account in their resource adequacy assessments and ten year network development plans (TYNDPs).

Rules and methodologies for adequacy outlooks and cost-benefit analysis for investment plans in infrastructure must be maintained and enhanced to provide coherence and comparability across the EU. Furthermore, these methodologies must provide for adequate consideration of flexible renewables and demand side response in the development of scenarios for future infrastructure needs. At EU level, the Commission, ACER and ENTSO-E must ensure alignment between their own planning (e.g. Community-wide TYNDP, the European generation adequacy outlook) and the 2030 renewable and energy efficiency targets.

**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)**

Long-term infrastructure planning should remain distinct technical exercise from development of NECPs. To support infrastructure planning by TSOs and DSOs, however, MS must provide sufficient national level projections for renewables, and specific information on how they intend to increase system flexibility and integration of renewables:

- removing excess and inflexible capacity
  - optimising grid use and implementation of the efficiency first principle in grid investments
  - improving locational price signals
  - use of smart meters
  - use of the heating systems as balancing pool
  - interconnections
  - demand side management by electric vehicles
  - pilot projects in electrification of trucks and specific electrified truck lanes on the important transit highways in the Union
  - the role of demand side participation and storage in price formation
- Furthermore, MS need to plan for how they intend to support prosumers (participating in both demand side response and production of renewable energy) and how they will reduce associated barriers to market entry for new actors (e.g. aggregators, community energy initiatives).

**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)**

The April 2015 mid-term evaluation of the Renewable Energy Directive performed in the context of the REFIT programme concluded that the overall administrative burden and costs of planning and reporting obligations are reasonable, compared to the benefits.

***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 checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Internal Energy Market	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Energy infrastructure	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Energy efficiency	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Renewable energy	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
GHG emissions reduction (decarbonisation)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Research, Innovation and competitiveness	<input type="radio"/>	<input checked="" 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 checked="" 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 checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

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

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

P&R must be rooted in legally binding legislation and must not weaken accountability or prevent the Commission from monitoring MS progress. The alternative, a soft non-binding approach (e.g. an Open Method of Coordination, or OMC) will be incapable of providing credibility or transparency. Streamlining needs to ensure the existence of powerful accountability tools which make the attainment of the EU objectives credible, including through:

- binding templates to allow for effective, monitoring, and progress comparison (e.g. EU level aggregation)
- a legal mechanism to ensure the sum of MS effort is sufficient to enable the EU to meet its 2030 targets
- a legal mechanism to ensure MS accountability
- transparent access to relevant documentation
- regular status updates on MS and Commission actions
- regular updates of NECPs
- meaningful participation of stakeholders in the plan-making processes
- binding provisions to include a 2050 perspective
- a binding framework for the use of KPIs

**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 current landscape exhibits inconsistencies between weak/strong reporting elements:

- while a MS can be asked to update its NREAP if it is not on track to meet its indicative target under the RED, there is no such accountability link between plans and target under the EED
- Reporting under the ESD/MMR is extremely narrow as they are only intended to implement international commitments.

Additionally, the Commission's reporting exercise is more retrospective than forward looking and generally fails to provide robust policy signposts and to probe the impact of free riders.

Furthermore, there is a lack of transparency around compliance and enforcement of reporting obligations as not all MS reports are available on the Commission website and no information is provided on whether the Commission is pursuing MS non-compliance with reporting obligations.

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

Streamlined planning and reporting requirements could provide an opportunity to highlight the synergies between the three climate and energy targets and their policies, such as the benefits of RES generation and energy savings as key measures to reduce GHG emissions.

Furthermore, streamlined reporting could enhance acceptance and transparency of RES in MS.

There should be a rapid link of energy statistics reporting between national and EU level and clarity on reporting indicators.

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

The reporting provisions from the current directives need to be safeguarded. A preferred option would therefore be to keep separate, detailed reporting (including on the pathways and the targets) as part of the implementation of the specific directives, with separate, overall climate and energy reporting mostly to ensure coherence and synergies between the different reporting obligations, and including the general direction that each MS is willing to take.

Should the EU go down the path of one single reporting instrument, then all the various elements to be reported upon should best get decided during the discussions on the specific pieces of legislation. In this case, one needs to carefully ensure coherence between what is decided in the framework of the revision of the specific directives and the proposed planning and reporting legislative instrument, both of which will probably have different timings.

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

Please refer to question 3 c.

[\*] 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)**

As all Member States complied with preparing NREAPs, and these plans have proven useful in monitoring the achievement of the binding EU goal of 20% RE in gross final energy consumption, we encourage the European Commission to continue using them in the post-2020 governance framework. Once Member States have defined their national contribution towards the EU goal and have decided on indicative trajectories with interim targets and concrete policies and measures, these plans will be key to monitoring whether countries remain on track.

In addition, Article 3(2) of the Directive requires that MS “take appropriate steps” to develop renewable energy “in conformity with the national indicative targets”, with an additional requirement that the steps “must be proportionate” to attain the objective. This requirement should also be maintained, allowing the Commission to require Member States to revise their plans where the policies and measures described are deemed insufficient for staying on track or where Member States introduce retroactive measures which clearly negatively impact the development of renewable energy and endanger investor certainty.

**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)**

As in the case of planning, all reporting obligations currently included in the EED and the EPBD should be maintained. No detail should be lost.

The arguments provided under question 5 are also relevant for reporting.

In addition, it must be underlined that EU energy efficiency policy is essential for the achievement of the EU GHG targets. This is another reason for ensuring a proper reporting by MS of their energy efficiency targets and measures and a proper monitoring of these reports by the EU executive body.

There is also a number of EED reporting obligations that are strictly related to the EED obligations (Annex XIV, part 2.3). Without proper reporting, these provisions would not provide expected result. The reporting in these cases should be rather reinforced than weakened.

Future reporting (and planning) should also include the efficiency first principle.

**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)**

Reports on low-carbon development strategies should exhaustively describe: 1) measures taken to achieve the GHG national targets 2) the spending of ETS funds 3) the progress made on the retirement of coal power plants 4) the progress made on the phasing out of fossil fuel subsidies.

We would like to draw your attention to one missing element, i.e. the fair cost comparison between RE and nuclear and/or other technologies, such as CCS. In evaluating the effectiveness and efficiency of a low-carbon development strategy, the cost factor plays an important role. For example, the cost of nuclear energy generally does not take into account the decommissioning costs, nor does it include appropriate liability premiums. This leads to a distorted image and an unfair cost advantage over renewables. In spite of the Commission's efforts to shed light on these costs in its report on prices and subsidies, the picture is still skewed. EREF thus suggest including the true costs of the different options in the reporting on low-carbon development strategies.

**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)**

Reports on infrastructure development should exhaustively explain progress made towards the achievement of the 15% interconnection target. In line with the 2030 EU-wide binding target for RES they should illustrate how grids are preparing to accommodate around 50% RES electricity, mainly solar and wind power. They should describe curtailment practices and prove how RES curtailment is being minimised.

There is a need to ensure sufficient oversight of system operators' (e.g. TSOs) long-term planning obligations. In particular NRAs must continue to exercise appropriate oversight at national level over the development of adequacy assessments, and the development and implementation of investment plans. Moreover, oversight must be strengthened at regional level regarding cooperation between TSOs, particularly to ensure that long-term network planning is consistent with C&E objectives, including integration of renewable consistent with the 2030 EU objective and enhanced system flexibility.

**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)**

Market monitoring obligations and duties on NRAs need to be maintained and strengthened. Thus far, the legal framework does not sufficiently address the need to report on market integration of new non-traditional market players in general (e.g. storage and demand side response providers) and prosumers in particular (e.g. individual households and non-household customers, and community energy initiatives). In particular, there is a need for NRAs to strengthen existing monitoring and reporting of grid access, including instances of discrimination and challenges faced by new market actors. Member States and NRAs need to report on specific information on enhancing system flexibility in order to provide certainty to investors and network planners.

**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)**

EREF is not aware of any cost-benefit analyses which compare R&D investments in nuclear energy with R&D investments in renewable energy technologies. Such a comparison would help inform decisions and would lead to a more balanced research and investment strategy.

**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)**

The experience of the RED has shown that although reporting provisions result in initial high costs, these are outweighed by benefits over time. The REFIT evaluation of the RED has made clear that the use of mandatory and well defined provisions, such as the NREAPs, are more effective than voluntary provisions, and that rules set from the beginning are more efficient at ensuring transparency, stability, and credibility than provisions at a later stage.

This resonates with the need to use binding templates for the P&R exercise to avoid un-assessable planning and subjective reporting. The binding nature of P&R has indeed ensured a high degree of compliance by MS and good quality information, the latter of which cannot necessarily be said for the experience under the EED which provided more flexibility for MS. Binding P&R has also provided investors with necessary information to determine key investment decisions, and has helped ensure public participation in the planning process.

***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 checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Internal Energy Market	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Energy infrastructure	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Energy efficiency	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Renewable energy	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
GHG emissions reduction (decarbonisation)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Research, Innovation and competitiveness	<input type="radio"/>	<input checked="" 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 checked="" 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 checked="" type="radio"/>	<input type="radio"/>

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

<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>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
<p>The Commission is better enabled to provide substantial and useful advice and ensure uniform application of EU legislation</p>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

**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 checked="" 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 checked="" 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 checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

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

<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>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<p>The Commission is better enabled to provide substantial and useful advice and ensure uniform application of EU legislation</p>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

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 checked="" 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 checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

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

<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>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<p>The Commission is better enabled to provide substantial and useful advice and ensure uniform application of EU legislation</p>	<input type="radio"/>	<input checked="" 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)

P&R must be legally binding to be credible and should build on a modular approach, which responds to concerns for streamlining while also ensuring integration and conformity with good governance principles. Such an approach would allow for:

1. High level strategies to elicit MS buy-in, including pledges and mandatory tracking of KPIs. These strategies need to be rooted in law, although with differentiated requirements depending on the legal nature of the targets or objectives.
2. More detailed transparency and information sharing anchored in law to ensure its enforceability (including mandatory P&R templates ), which builds on existing P&R requirements, and that can be centralised in one instrument. Because relying on a single streamlined instrument would risk losing detailed information necessary for certain audiences, some sector-specific P&R need to be maintained in other revised directives.
3. The creation of links between national P&R and long-term decarbonisation objectives for 2050.

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

In the absence of national targets, a non-binding Governance system (i.e. a non-binding template and/or providing insufficient detail) would severely damage investor confidence and lead to a halt in renewable energy development across Europe, thus endangering the achievement of the binding EU goal of at least 27% RE in gross final energy consumption and the long-term decarbonisation objectives.

The existing instruments (RED, EED and ESD) already contain the building blocks necessary for a robust governance for the 2030 targets. Integrating all climate and energy planning obligations into one single plan would produce a huge, unmanageable document, which risks reducing the level of clarity and detail currently provided by Member States. In addition, having strong tailored instruments sends a strong signal to investors, Member States and stakeholders. We encourage the European Commission to maintain and strengthen the existing sectorial legislation.

**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 national 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 checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Internal Energy Market	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Energy infrastructure	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Energy efficiency	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Renewable energy	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
GHG emissions reduction (decarbonisation)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Research, Innovation and competitiveness	<input type="radio"/>	<input checked="" 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)**

Legal options for streamlining P&R into NECPs needs to be assessed with respect to their respective risks and opportunities. The MMR already provides a framework for streamlining climate P&R (under the ESD, ETS reporting, and international obligations). As such, the MMR could be used as a model for streamlining, including by:

- Streamlining P&R into the MMR, using cross-referencing from P&R in sectoral directives to coordinate the Energy Union governance (including KPIs, preventive and corrective actions).
- Placing high level P&R into a new MMR-type governance instrument acting as a chapeau to the sectoral P&R, which would allow for additional institutional innovation and provide for more transparency, and preventive and corrective measures. Nevertheless, there is a risk MS oppose new measures and block necessary EU governance innovation.

It is crucial that legal options for streamlined NECPs do not replace dedicated sectoral legislation and stronger rules where necessary, which is needed for specific dedicated P&R, There are significant risks of over-streamlining into an MMR-type instrument, as a simple 'policies and measures' approach to all P&R would jeopardise transparency, comparability, legal certainty, and accountability. In particular, where information serves specific strategic purposes or objectives which would be compromised by streamlining, they should be kept separate.

**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)**

At present, the European Commission must provide a biannual progress report based on Member States' reports. In our view, this progress report should be maintained and further developed to reflect the increasing challenges due to the absence of national binding targets. As it stands now, the report is backward looking and does not touch on any political sensitive issues. In the future, the report should include an analysis of the implications of the quality of the policies and measures for the state of renewable energy development and system transformation, as well as an assessment of the need for future action.

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

Please refer to question 3b.

**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)**

The development of NCEPs and KPIs must be rooted in legislation and be transparent and participatory. A soft OMC process, a weak form of governance, would be incapable of providing a credible framework for ensuring target delivery.

Rooting P&R in a legally binding regime would ensure the Commission has the data to verify MS contributions towards meeting Energy Union objectives, particularly the 2030 targets, and send a clear signal to investors concerning the seriousness of MS and EU commitments.

It would also allow the European Parliament to have a say in the legislative process and citizen to use their right under the Aarhus Convention to participate in the development of national plans.

Lastly, NCEPs and KPIs must be underpinned by a useful high level political process between MS and EU which not only increases MS ownership of the system, but also enables the Commission to ensure that EU and MS targets are reached (e.g. use of its enforcement authority).

**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)**

At a minimum, the update of the NECPs should align with the review process under the Paris Agreement. However, further monitoring and course correction actions should also have a prominent space within a semester-type process rooted in law.

Firstly, the Commission should be required to regularly assess whether collective action is sufficient to meet the 2030 targets and to propose additional EU measures to fill the gap if the targets are not likely to be met. There is precedent for such measures in Art 4 ESD, which triggered the adoption of the EED.

Secondly, the Commission's authority to require corrective action should be enhanced. Annual reporting could aid this process by providing non-binding country recommendations on the basis of KPIs tracking. Additionally, the Commission could provide guidance as part of the biennial reporting and request MS to update their NECPs where they are not meeting agreed objectives and, when legally feasible, to implement binding recommendations.

***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 checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
European Parliament	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
European Council	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Energy Council	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Environment Council	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
National administration	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
National parliaments	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
National stakeholders	<input checked="" 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 checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Regional fora	<input type="radio"/>	<input checked="" 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 checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
European Parliament	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
European Council	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Energy Council	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Environment Council	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
National administration	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
National parliaments	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
National stakeholders	<input checked="" 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 checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Regional fora	<input type="radio"/>	<input type="radio"/>	<input checked="" 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 checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Review national plans and analyse Member States' contributions	<input checked="" 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 checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Approve national plans	<input checked="" 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 checked="" 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 type="radio"/>	<input type="radio"/>	<input checked="" 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 type="radio"/>	<input checked="" 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 type="radio"/>	<input checked="" 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 checked="" type="radio"/>	<input 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 checked="" 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 checked="" 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 checked="" 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 checked="" type="radio"/>	<input type="radio"/>
Mutual reviews should be mandatory for Member States	<input checked="" 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 checked="" 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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