

## European Commission consultation - Updating EU legislation to make EU independent from Russian fossil fuels (RePowerEU)

Electrification and the transition to renewable energy sources combine emission reductions and energy efficiency. Energy Norway supports the proposal to raise the renewable target for 2030 to 45% in the Renewable Energy Directive. The transition to green energy should be driven by the 55% emission reductions target and the ETS mechanism. We support increased ambitions for energy efficiency, but we do not advocate for specific efficiency targets.

All renewable power should be treated equally in the power grid on a technology neutral basis. Generally, the building regulations should be technology neutral, but we do support the solar rooftop initiative on marked based principles. Coincidental peak production from PV challenges the power grid at distribution level, so digitalisation and storage technologies must be included for optimal utilisation of the production and grid capacity. Tax exemptions and reduced tariffs for self-consumption represent redistribution of grid tariffs. Care should be taken not discriminating customers who cannot become prosumers.

Energy system integration and combining energy carriers are necessary to meet increased energy demand. Energy flexible solutions and increased use of heat pumps, solar thermal, district heating, and excess heat from all relevant sources in the building sector, may free up electricity for further electrification and provide better use of capacity in the electricity grid.

We strongly support initiatives speeding up renewable energy production, such as simplified, shortened permitting with clear deadlines, as well as transparency and digitally available data sets. However, we stress the importance of limiting conflicts to ensure both short and long term local and public acceptance. Local empowered involvement throughout the entire process is key to ensure this.

Replacing project-specific environmental assessments with general environmental ones raises concerns. Local acceptance requires reflection of local concerns. "Go-to" areas on land are controversial and can spur local discontent escalating to public opposition, as seen from the Norwegian "go-to" areas for land-based wind power, launched in 2019. Although based on a public comprehensive compilation of relevant data, Norwegian "go-to areas" were retracted half a year later due to public opposition. Project-specific assessments are more factually relatable for local involvement. Also, "go-to areas" are a less suitable tool for managing sum effects of activities within and across areas.

The definitions and framework for renewable hydrogen in the two delegated acts must not be designed too strictly, and at the same time leave no room for doubt for the difference between green and grey hydrogen. We would like to repeat our previous key messages concerning the Delegated Act on Additionality:

- We welcome article 4.1 as an exemption from the more detailed rules in 4.2. We still would like some more clarification concerning the calculation of the renewable electricity proportion.

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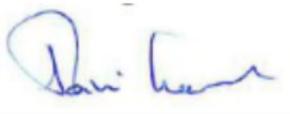
- The strict rules under article 4.2. could hamper the rollout of green hydrogen in Europe.
- The role of the Guarantees of Origin needs to be communicated more explicitly throughout the Delegated Act.
- Energy Norway would also support to postpone the transitional phase to 31.12.2029

Member States should design, schedule and implement support schemes – and Guarantees of Origin – in such a way that they are compatible with, complement and enable corporate purchase agreements of renewable energy. We support the strengthening of renewable PPAs and the Guarantees of Origin system. It is important that Member States do not introduce regulation that restricts the freedom of contract, for example by imposing the use of standardised contracts.

Transnational cooperation is vital. We stress the importance that PCIs linked to offshore wind remain highly prioritised, while still investing in the limited additional gas infrastructure.

**Best regards,**

**Energy Norway**



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Director