

Dear ladies and gentleman,

I would like to thank you at first for the possibility to take part in the consultation process for the new CEEAG. I welcome the new scope of the draft for the new state aid guidelines that is now enlarged for new areas and technologies in line with the new climate goals of the European Union. Nonetheless, I see the danger of allowing too much aid for low carbon technologies. Low carbon technologies should not get the same treatment as truly green technologies.

From my point of view, another critical aspect of the draft can be found in paragraph 93, where the threshold for the competitive bidding processes are defined. Should this be realized and the current de-minimis regulation is abolished (1 MW for photovoltaic and 18 MW for wind parks), I fear the smaller and non-commercial market actors, like energy communities or citizen energy projects will be pushed out of the market due to their limited financial and personal resources. Competitive bidding has a negative influence on the diversity of bidding participants, which was recently shown in a study by the German Umweltbundesamt ([Study here](#))

The draft contains possibilities for Member States to use exemptions for these bidding thresholds (Paragraph 82 f.), but the obstacles for their confirmations are relatively high. Therefore, there exists a high risk, that Member States won't make use of these exemptions.

Instead there should be a dedicated segment for possible exemptions and a higher threshold for citizen energy projects and renewable energy communities regarding the requirement to take part in the competitive bidding processes in the CEEAG. Member states need a clear and dedicated manual for the construction of special aid for citizen energy projects. This would strengthen legal certainty.

The non-consideration of RECs in the draft is also not in line with the regulation and goals in the EU clean energy package, that highlights citizen energy as important building block for a successful and accepted energy transition and therefore also for climate protection (RED II Art. 22 (7)).

I hope that my opinion is helpful in the finalisation of the guidelines.

Best regards
Felix Schwabe

from Magdeburg, Germany