

Written comments from Slovenia

Guidelines on State aid for climate, environmental protection and energy

Slovenia welcomes the new Guidelines on State aid for climate, environmental protection and energy. Nevertheless, Slovenia would like to ask the Commission for additional clarifications and propose some modification to the draft Guidelines:

1. Slovenia would like to propose to the EC to include a tabular overview of all eligible measures (aid categories), aid intensities, eligible costs, similar to Guidelines 2014-2020, Annex 1.
2. Is it correctly understood that for incentive measures in the field of energy efficiency and renewable energy sources, it is proposed that the aid be treated at the level of cost per reduced greenhouse gas emission unit, which means that the aid can be determined as a share of eligible costs and additionally by taking into account e.g. the cost of greenhouse gas emissions saved? The question is whether it will be necessary to have a greenhouse gas reduction calculation for each investment - because only in this way will it be possible to determine the cost/GHG.
3. In the proposal there is a recommendation that CO₂ savings be calculated in the way set out in the documents presented in the Innovation Fund call. Will this become the official and preferred way of the Commission to calculate CO₂ savings?
4. Are there any restrictions for companies involved in the ETS (except, for example, in energy audits and energy management, due to the requirements of the EED for large companies - most ETS companies are also large companies at the same time)
5. What is the meaning of points 125 and 126 regarding the determination of eligible costs? To meet the requirements of the BPD Building Performance Directive, Slovenia has certain values in the Rules on the efficient use of energy in buildings (PURES). How are eligible costs determined? Only to exceed the standard (from PURES) or to, as set out in point 118, to take into account the eligible costs incurred in an investment that meets the criteria of point 118 (20 or 30% improvement in energy efficiency compared to the baseline)?

Do we understand correctly that according to point 125, the full cost of the investment is now eligible (e.g. 15 cm of insulation is mandatory under PURES, and if 18 cm of insulation is given, all 18 cm is eligible; only 3 cm would be eligible under previous guidelines?)

6. The proposed guidelines define the eligible costs for clean transport vehicles in points 151 to 159, from which it is not possible to clearly understand what exactly a "less environmentally friendly investment" should be. For example, as a comparable investment for electric vehicles, vehicles with an internal combustion engine have been considered in the past, as most electric vehicles sold were manufactured on the basis of internal combustion vehicle models. Over the years, however, determining comparable investments has become increasingly difficult as it

has required increasingly difficult technical judgment. The market for electric vehicles is developing strongly and for many electric vehicles, the model of a vehicle with an internal combustion engine does not exist, but the electric vehicle is developed as an independent type of vehicle. We propose that precise guidelines be laid down at European Union level for determining a comparable investment in electric vehicles (e.g. what technical and possible other characteristics should be compared; whether the electric and comparable vehicle must be from the same manufacturer or have the same engine power; etc.). At the same time, we propose to draw up a single list of comparable vehicles for electric vehicles sold on the European market. With such a list, all Member States would have the same conditions for determining eligible costs.