

# EC consultation on the reviewed GBER proposal

---

A Eurelectric response paper

December 2021

Eurelectric represents the interests of the electricity industry in Europe. Our work covers all major issues affecting our sector. Our members represent the electricity industry in over 30 European countries.

We cover the entire industry from electricity generation and markets to distribution networks and customer issues. We also have affiliates active on several other continents and business associates from a wide variety of sectors with a direct interest in the electricity industry.

## We stand for

The vision of the European power sector is to enable and sustain:

- A vibrant competitive European economy, reliably powered by clean, carbon-neutral energy
- A smart, energy efficient and truly sustainable society for all citizens of Europe

We are committed to lead a cost-effective energy transition by:

**investing** in clean power generation and transition-enabling solutions, to reduce emissions and actively pursue efforts to become carbon-neutral well before mid-century, taking into account different starting points and commercial availability of key transition technologies;

**transforming** the energy system to make it more responsive, resilient and efficient. This includes increased use of renewable energy, digitalisation, demand side response and reinforcement of grids so they can function as platforms and enablers for customers, cities and communities;

**accelerating** the energy transition in other economic sectors by offering competitive electricity as a transformation tool for transport, heating and industry;

**embedding** sustainability in all parts of our value chain and take measures to support the transformation of existing assets towards a zero carbon society;

**innovating** to discover the cutting-edge business models and develop the breakthrough technologies that are indispensable to allow our industry to lead this transition.

Dépôt légal: D/2021/12.105/54

# EC consultation on the reviewed GBER proposal

A Eurelectric response paper

December 2021

## KEY MESSAGES

The revision of GBER should go hand in hand with the revision of the Guidelines on State aid for climate, environmental protection and energy (CEEAG) 2022 considering the new principles established under the European Green Deal (including the Energy System Integration Strategy and the Hydrogen Strategy) as well as the Industrial and Digital Strategies.

State aid has a crucial role to play when there are well-identified structural market failures, making market signals sufficient to achieve Green Deal objectives. The CEEAG should be the reference tool to define the framework allowing Member States' support, while the GBER should remain complementary for specific projects.

- Eurelectric welcomes the GBER reviewed proposal put forward by the European Commission. Eurelectric is committed to leading a cost-effective energy transition. GBER plays a crucial role in supporting electrification, which is key to achieving carbon neutrality and should be the first choice for the EU to meet the 2030 and 2050 objectives.
- Moreover, Eurelectric also welcomes the increased notification thresholds for certain types of projects (see below) and the inclusion of a dedicated category for electric vehicle charging infrastructure.
- Furthermore, Eurelectric highlights the growing importance of all types of storage, stand-alone and those combined with renewable power plants, in contributing to decarbonisation in terms of integration of renewable sources and avoiding curtailment of renewable energy.
- The GBER review should take into consideration and seek coherence with the ongoing review and development of other EU initiatives under the scope of the Fit for 55 Package and the upcoming Hydrogen and Decarbonised gas market package. In this context, the European Commission should ensure consistency in terms of terminology and legislative acquis.
- GBER should take into account the different starting points of Member States and their regions in the decarbonisation process.

- The European Commission should clarify some of the terms and concepts included in the GBER to ensure a better understanding and implementation of the text (see detailed comments below).
- Lastly, Eurelectric welcomes any provision aiming to streamline, rationalise and accelerate permitting procedures (also in light of the CEEAG), which would be tangible and effective immediately, both for new and existing in need of modernisation. In this regard, Eurelectric supports the European Commission's Toolbox on Energy prices<sup>1</sup> which recommends accelerating permitting procedures and looking at issuing an EU Guidance document on Permitting in 2022.

---

<sup>1</sup> [Communication on Energy Prices](#)

## Detailed comments:

### 1. Definitions (Amendments to Art. 1 of existing GBER)

About point (102c) on 'renewable hydrogen' defined as follows “hydrogen produced using only renewable sources of energy, in accordance with [Reference to delegated act by DG ENER pursuant to Article 28 of the RED II];”.

Eurelectric would like to express its concerns regarding the inclusion of a reference to the delegated act pursuant Art. 28 of the RED II. Indeed, the following delegated act is still under development and, at the moment, it seems inappropriate (both in terms of content and timeline) to reference such text in the GBER reviewed version. This could lead to legal uncertainty. Therefore, Eurelectric would recommend waiting for the discussions on Art. 28 of the RED II to take place before including it as a reference in the GBER.

About point (102e) on 'low-carbon hydrogen' defined as follows “means fossil-based hydrogen with carbon capture and storage or electricity-based hydrogen, where that hydrogen achieves life-cycle greenhouse gas emissions savings of at least [73.4 %] [resulting in life-cycle greenhouse gas emissions below 3 tCO<sub>2</sub>eq/tH<sub>2</sub>] relative to a fossil fuel comparator of [94g CO<sub>2</sub>e/MJ (2.256 tCO<sub>2</sub>eq/tH<sub>2</sub>)]. The carbon content of electricity-based hydrogen shall be determined by the marginal generation unit in the bidding zone where the electrolyser is located in the imbalance settlement periods when the electrolyser consumes electricity from the grid”.

Eurelectric welcomes the effort in clarifying the low-carbon hydrogen terminology in the sphere of the GBER. However, we would like to express some concerns about anticipating such a strategic definition under the review of the GBER, considering the expected publication of proposals reviewing the Natural Gas Directive (under the “Hydrogen and decarbonised gas market package”). At the moment, it seems inappropriate (both in terms of content and timeline) to reference such text in the GBER reviewed version. Indeed, this could lead to a lack of consistency and harmonised definitions in different European legislative frameworks.

Furthermore, the definition proposed in the revised text of the GBER seems to refer to the thresholds established in the delegated act pursuant to the EU Taxonomy Regulation. Nevertheless, the calculation should be carried out based on the carbon intensity of the marginal production unit in the bidding area where the electrolyser is located, instead of the carbon intensity of the electricity mix (as proposed in the EU Taxonomy delegated act). While the GBER proposal strives to build coherence with the EU Taxonomy framework, it actually sets stricter requirements than the delegated act. Also, determining the hydrogen's carbon content through the marginal generation unit in the bidding zone is hardly feasible in real conditions. Therefore, we call for a full alignment with the EU Taxonomy framework definition, which ensures coherence at EU level.

About point (102g) on 'zero emissions vehicles' defined also as “(c) a zero-emission heavy duty vehicle as defined in Article 4, point (5) of Directive 2009/33/EC;”.

Eurelectric would like to point out that such a reference is inconsistent with the proposed CEEAG. Indeed, the Commission's proposal for the CEEAG refers to Regulation 2019/1242 to define zero-emissions vehicles. We invite the European Commission to verify the alignment of definitions between the GBER proposal and the CEEAG.

About point 108b on 'green cogeneration' defined as follows "cogeneration using 100 % renewable energy sources as an input for the production of heat and power".

Eurelectric questions the use of the term "green" instead of "renewable" as used for other definitions such as renewable electricity, renewable hydrogen, etc. We believe that the European Commission should seek consistency in the terminology.

Besides, Eurelectric believes that high-efficient cogeneration based on sustainable biomass (i.e. following the sustainability criteria established in the REDII) should be considered renewable.

About point 109 on 'energy from renewable sources' or 'renewable energy' defined as follows "energy from renewable non-fossil energy sources as defined in Article 2, point (1), of Directive 2018/2001/EU, as well as the share in terms of calorific value of energy produced from renewable energy sources in hybrid plants which also use conventional energy sources and includes renewable electricity used for filling storage systems connected behind-the-meter (jointly installed or as an add-on to the renewable installation), **but excludes electricity produced as a result of storage systems**";

Eurelectric recommends reviewing and clarifying the wording "produced as a result of storage systems" to clarify what is intended by "produced" and what are the implications for hybrid systems (i.e. energy produced by renewable plants connected to the grid or feeding into a storage system).

About point (130a) on 'distribution system operator' (DSO) defined as follows "a distribution system operator as defined in Article 2, point (29), of Directive (EU) 2019/944" and point (130b) on 'transmission system operator' (TSO) defined as "a transmission system operator as defined in Article 2, point (35), of Directive (EU) 2019/944".

Eurelectric would recommend the European Commission to clarify the scope of these definitions. Indeed, the Directive (EU) 2019/944 focuses on electricity. As such, we understand that the scope of these definitions is therefore limited to electricity TSOs and DSOs. However, we would expect that the definitions of DSO and TSO are also covering the sector of gases (methane, hydrogen,...). We would welcome clarifications on the scope of the definitions.

## 2. General comments applying to several sections

- Eurelectric highly appreciates and supports the following changes concerning aid limits not subject to the notification obligation. The project increases the amount of aid granted:

- for operational aid for the promotion of electricity from renewable sources up to EUR 20 million, which is a relatively small increase and it would be appropriate to set a higher threshold. However, we positively assess the increase of the threshold of EUR 250 million per year;
- for heating and cooling systems up to EUR 50 million per project – an increase from EUR 20 million is a significant advance that will support efforts to combat low emissions<sup>2</sup>;
- for energy infrastructure from 50 to 70 million EUR per project, which we also welcome.

Under several articles, the European Commission establishes the net present value (NPV) to specify investments conditions. We strongly recommend that the European Commission clarify their views on the NPV computation (including discount factors) in a GBER FAQ as a non-binding guidance document.

- As expressed in [our response](#) to the Commission's consultation on the GBER roadmap, the revised GBER should take into account the different starting points of Member States and their regions, recognising also the importance of just transition processes in regions that are facing coal-phase out and restructuring. With this in mind, we call on the Commission to ensure consistency and coherence among different state aid regulations (making cross references), clarifying and assuring that for example aid intensity bonuses for "assisted areas" (section 7 of the GBER) are maintained. The efforts related to energy transformation in regions in transition will be immense, and thus it is necessary to ensure an appropriate level of support.
- Investment aid for research infrastructures should not be made conditional on the granting of access to several users only. This is a very delicate situation which could lead to conflicts with data protection ambitions and/or legislation within Member States. It would be challenging and could hold back technological development. This conflict should be addressed in the revision of the regulation.
- We recommend that instances where the aid is provided from the Cohesion Policy funds (in particular the: ERDF, Cohesion Fund) if such aid would be granted on the basis of a "competitive bidding process", the requirement will be waived stating that "The submitted bid or the clearing price shall not account for less than 75 % of the weighting of the selection criteria" [as for instance in the proposed wording of Article 39(10)(c), Article 36a(4)(c)]. The procedures for the distribution of the Cohesion Policy funds by definition assume a bidding procedure; however, this procedure will not necessarily, in each and every case, meet the conditions of a competitive bidding process. Particularly, in the case of the operational programmes implementing the Cohesion Policy funds, the selection criteria are not focused primarily on the price aspect but often also refer to numerous other aspects. Therefore, a derogation from this approach should be foreseen in the case of operational programmes implementing Cohesion Policy funds – in this situation, the selection criteria are not only focused on the price aspect but often also refer to a number of other quantitative or qualitative benefits in relation with social welfare. In our view, we should still treat competitive procedures in case of cohesion policy

---

<sup>2</sup> Low emissions mean emission of combustion products of solid, liquid and gaseous fuels to the atmosphere from emission sources (emitters) located at a height of not more than 40 m. It does not mean low level of emissions

operational programmes as competitive bidding processes even if more than 25% of selection criteria concern non-price aspects of projects.

- As also raised in our response to the Commission's consultation on the GBER Roadmap, Eurelectric supports the introduction of dedicated categories for renewable and low-carbon hydrogen, especially produced by facilities using electrolysis of water. Renewable and low-carbon hydrogen will decarbonise applications where direct electrification is not feasible, efficient or has higher costs. As such, Eurelectric welcomes the introduction of provisions applying to renewable hydrogen, aligned with the Hydrogen Strategy's objective of a renewable-based hydrogen market in 2050. **Nevertheless, to fully grasp the role of hydrogen in supporting the electrification of our economy the decarbonisation of the hard-to-abate sectors, we would also strongly call upon the European Commission to include dedicated provisions covering investment and operating support mechanisms for power-based low-carbon hydrogen in the GBER.**

In this context, Eurelectric proposes including in Art. 1 of the draft reviewing Regulation:

- Inclusion of a new point (30a): 'the investment and operating support mechanisms set up in points 22, 28, 29, 30 shall also apply to projects whose objective is the production, use or storage of low carbon hydrogen'.
- Points (2)(e) and (2)(f) are amended as follows: the words 'renewable hydrogen' are replaced by the words 'renewable and low carbon hydrogen'.

As such, Eurelectric would like to stress that the industry supports the potential of power-based solutions as flexibility options for a highly-integrated energy system. The diversity of power-based flexibility options should be explored, including demand-side management, energy storage and the conversion of excess electricity via power-to-X technologies.

### **3. Investment aid for environmental protection, including climate protection (Amendments to Art. 36 of existing GBER)**

Eurelectric would like to express several comments regarding the provisions amending article 36:

- About point 2a outlining cumulative conditions for investments in carbon capture and utilisation or storage ('CCUS'), we invite the European Commission to clarify if the scope of this provision also covers investments in production installations using captured CO<sub>2</sub>. If this is not the case, we welcome clarifications on which provisions and conditions apply to the latter activity.

### **4. Investment aid for recharging or refuelling infrastructure (Amendments to Art. 36a of existing GBER)**

In general, Eurelectric supports the amendments to this article for the promotion of recharging infrastructure. In this case, we also consider there could be cases where it is need of that the aid intensity may reach up to 100 % of the eligible costs (as proposed in the

consultation), in particular in sparsely populated regions where a market-driven construction of recharging infrastructure is hard to develop.

About new paragraph 3: Although the GBER proposal mentions that the eligible costs may also cover the investment costs of integrated on-site production of renewable electricity or the investment costs of storage units for storing renewable electricity or renewable or low-carbon hydrogen, it also imposes that the peak capacity of the integrated on-site renewable electricity production unit shall not exceed the maximum rated output of the recharging infrastructure to which it is connected. Overall, we consider the Commission's proposal and requirements are too restrictive.

Given that this renewable electricity production might be based on intermittent sources (cfr use of PV panels or windmills), this additional requirement (max. peak capacity lower than max. rated output) seems to overlook the possible intermittency of the renewable generation. In this case, combined use of higher renewable generation capacity and energy storage could provide additional firmness to feed recharging infrastructure. In other words, a higher capacity for renewable generation could help store more energy in the associated energy storage and then help the combined system (RES generation + storage) to deliver energy to the recharging infrastructure even if renewable generation is not available (cfr intermittency). Naturally, the capacity (RES generation and storage) in the combined system should be dimensioned in a cost-efficient way with regard to the capacity of the recharging infrastructure.

#### **5. Investment aid for the acquisition of clean vehicles or zero-emission vehicles and for the retrofitting of vehicles (New Art. 36b)**

About new paragraph 3b, point (a), establishing that "for the buildings referred to in paragraph 3a, the aid granted for the improvement of the energy efficiency of the building may be combined with aid for any or all of the following measures: (a) the installation of integrated on-site renewable energy installations generating electricity, heat or cold", Eurelectric calls for including the possibility for generation of renewable gases such as renewable hydrogen when such an alternative indeed stands for an energy efficiency improvement.

#### **6. Investment aid for the promotion of energy from renewable sources, renewable hydrogen and high-efficiency cogeneration (Amendments to Art. 41 of existing GBER)**

Eurelectric would like to express several comments regarding the provisions amending article 41:

- Eurelectric highlights the growing importance of all types of storage, stand-alone and those combined with renewable power plants, in contributing to decarbonisation in terms of integration of renewable sources and avoiding curtailment of renewable energy.

Paragraph 1 inserted in Art. 41 establishes the conditions necessary for the aid granted to projects based on a scheme open to combined renewable and storage projects ("behind-the-meter") to be exempted from notification. Eurelectric understands that these conditions are:

- Both elements are installed and put into operation at the same time;
- Storage investment shall have as a maximum the same capacity as the connected renewable investment;
- If storage is connected to an existing facility, storage must fulfil the same conditions. As such, the verification process will look at both investments (RES + storage) to establish compliance with the thresholds set out in Art. 4.

This definition does not clarify what should be understood by "behind the meter". Therefore, it can be interpreted as referring to a storage plant that can only be filled with electricity from the renewable plant (storage is behind the meter of the RES generation plant) and cannot store electricity from the grid.

Eurelectric firstly proposes that the meaning of "storage behind the meter" is defined to clarify whether the storage facility can be powered from the grid.

If, as we understand it now, the storage facility can only be filled by a renewable plant, Eurelectric proposes applying at least the same flexibility. For instance, one option would be, once the revision of the RED II will be advanced and the delegated acts adopted, one could consider applying the verification criteria provided in this text. A second option could be to allow storage linked to renewable energy to take energy from the grid, proving its renewable origin through guarantees of origin.

- We consider the provision of the new paragraph 2 unacceptable. Indeed, based on the technology neutrality principle, all bioenergy technologies should be able to benefit from state aid if fulfilling RED criteria. The GBER provision should not establish limitations based on one section (i.e. "Part A of annex IX" on feedstocks) of the existing EU legislation. Indeed, Part A of annex IX targets feedstocks for the production of biogas for transport. Therefore, it is not relevant to apply such a section to power generation activities.

- In the provisions of the new paragraph 4a (and also Article 46(1b)), a requirement was introduced that it is possible to grant state aid to installations using natural gas fuel "where compliance with the 2030 and 2050 climate targets is ensured". Eurelectric fully supports the guiding principles for the assessment of investment in fossil fuels or natural gas projects. The Power Sector is committed to delivering a carbon-neutral electricity supply well before 2050.

The irreversible decline of fossil fuels such as natural gas in the EU energy mix, needed to reach European climate objectives, requires further direct electrification based on renewable and carbon-neutral sources. Where this is neither feasible nor efficient, other energy carriers can be used, including renewable and low-carbon gases (biomethane, green hydrogen, etc...). Gas-fired capacity (running on renewable/low-carbon gases in the long-term) could be instrumental in the short/medium term in securing electricity supply at the right level, to cope with more penetration of intermittent RES generation. This is even more important if the level of electrification is higher than today. The assessment of investment in gas projects should take the context of energy system integration into account and the contribution to security of supply of renewables and low-carbon gases in the energy transition of some EU regions, especially those ones that don't have access to hydro or nuclear, depending on national specificities and the changes in their generation mix. As mentioned above, the balancing test between positive and negative effects needs to take into account the need to cope with three different objectives: cost-effective decarbonization, security of supply and cost for consumers.

We would be grateful if the Commission could clarify what is meant by "compliance with the 2030 and 2050 climate targets", thus guaranteeing legal certainty to the

beneficiaries of the aid instrument concerned. This may significantly hinder the introduction of new aid measures. As for the block exemptions, the use of wordings so susceptible to interpretation may however create an obstacle to applying the regulations in question.

- The new paragraph 7b states that “the aid intensity shall not exceed 15 % of the eligible costs for projects involving electricity storage”. The wording of the provision does not allow unambiguous determination if in the case of projects that in their scope combine a RES source with an electricity storage facility, the aid intensity shall be 15% for the entire project (i.e. the source and the storage), or whether perhaps the aid intensity is 15% but only regarding the component including the energy storage facility while the component including the source may be assisted with aid of intensity of 30% (see Article 41(7)(a))? This issue requires a rewording of the provision. In our opinion, the intensity of aid for combined projects (RES + storage) shall be at least 30%. In addition, this should leave the possibility of applying “regional bonuses” (see section 1 of this position paper).

On the new paragraph 10 outlining conditions for bidding processes, we would like to reiterate some comments which we also expressed in the context of the Commission’s consultation on the proposed CEEAG<sup>3</sup>. The paragraph describes the criteria of a competitive bidding process that would ensure the proportionality of the aid given. Subparagraph iii) is critical, as it has led to a downward spiral of the tender volume which leads to less RES being built (endogenous rationing<sup>4</sup>). While safeguards against insufficient competition are of course necessary, it should be ensured, that it does not have negative effects on the overall RES development. For example, in Germany, the reason for undersubscribed bidding is mainly related to problems with permitting. Therefore, Member States should not be forced to implement mechanisms that automatically reduce the tender volume in case of one-time undersubscribed bidding. Moreover, undersubscribed tenders should not lead to a cancellation of the undersubscribed budget, but to a postponement of the budget to a later period. Reasons for undersubscription should be identified and addressed.

## **7. Operating aid for the promotion of energy from renewable sources, renewable hydrogen and high-efficiency cogeneration (Amendments to Art. 42 of existing GBER)**

About new paragraph 7, while the sentence “for the avoidance of doubt, this applies as of the moment when prices turn negative” strives to clarify the scope of the provision, we believe that some elements remain uncertain. Indeed, Eurelectric recommends specifying which prices the Commission is referring to and what is meant by the “consecutive hours” rule is no longer applicable.

---

<sup>3</sup> See [Eurelectric response paper to EC draft Guidelines on State aid for climate, environmental protection and energy 2022, August 2021](#)

<sup>4</sup> See [Aures “Policy Brief” on “How \(not\) to respond to low competition in renewable energy auctions” \(June 2020\)](#)

## **8. Operating aid for the promotion of energy from renewable sources and renewable hydrogen in small scale installations and for the promotion of renewable energy communities (Amendments to Art. 43 of existing GBER)**

We consider the provision of the new paragraph 3 unacceptable. Indeed, based on the technology neutrality principle, all bioenergy technologies should be able to benefit from state aid if fulfilling RED criteria. The GBER provision should not establish limitations based on one section (i.e. “Part A of annex IX” on feedstocks) of the existing EU legislation. Indeed, Part A of annex IX targets feedstocks for the production of biogas for transport. Therefore, it is not relevant to apply such a section to power generation activities.

In the Art. 43, 2. the Commission provides a derogation from the obligation to allocate aid through a competitive bidding mechanism for small generation plants, as defined by Art. 5 of Reg. 2019/943. Nevertheless, the same Regulation provides a reduction trend for what concerns plant size in order to fall within the definition of “small projects” (400 kW until 2026, then 200 kW). It is worth highlighting the risk of discouragement in the development of such projects in the presence of an overly strict limit. We consider that this provision should be better assessed and modified with higher side thresholds criteria.

## **9. Aid in the form of reductions in taxes under Directive 2003/96/EC (Amendments to Art. 44 of existing GBER)**

We consider the provision of the new paragraph 4 unacceptable. Indeed, based on the technology neutrality principle, all bioenergy technologies should be able to benefit from state aid if fulfilling RED criteria. The GBER provision should not establish limitations based on one section (i.e. “Part A of annex IX” on feedstocks) of the existing EU legislation. Indeed, Part A of annex IX targets feedstocks for the production of biogas for transport. Therefore, it is not relevant to apply such a section to power generation activities.

About new paragraph 5, we consider the proposed connection to implement recommendations proposed in energy audits and energy management systems, to the extent that the pay-back time for the relevant investments does not exceed 3 years, is too far reaching and will be complicated to conduct from a tax administrative point of view. We consider energy audits and energy management systems to be good measures for supporting structured work on energy efficiency in companies. But the proposal will affect, for instance, all lower energy tax rates on electricity for a number of sectors and users. To link for instance a lower energy tax on electricity to an energy-intensive industry implementing measures following energy audits could be disputed. Especially if the measures proposed in an energy audit made by external consultants are disputable in terms of the overall investment plans of the industry and if they really support conversion plans to electrified processes, since energy audits are more about making already existing processes more efficient.

Furthermore, the proposed requirements to invest a significant share of at least 50 % of the amount of the reductions in projects that lead to substantial reductions of the installation’s greenhouse gas emissions, is hard to see how it will work in practice. For already electrified industries it might be hard to fulfil the obligations proposed in the text.

## 10. Investment aid for energy infrastructure (Amendments to Art. 48 of existing GBER)

Paragraph 3 of the reviewed GBER proposal establishes that “Aid for gas infrastructure shall only be exempted from the notification requirement of Article 108(3) of the Treaty where the infrastructure in question is dedicated to the use for hydrogen and/or for renewable gases, or mainly used for the transport of hydrogen and renewable gases.”

Overall, Eurelectric supports this proposal. The Power Sector is committed to delivering carbon-neutral electricity supply well before 2050. The irreversible decline of fossil fuels such as natural gas in the EU energy mix, needed to reach the European climate objectives, requires further direct electrification based on renewable and carbon-neutral sources. Where this is neither feasible nor efficient, other energy carriers can be used, including renewable and low-carbon gases (biomethane, green hydrogen, etc...). Gas-fired capacity (running on renewable/low-carbon gases in the long-term) could be instrumental in the short/medium term in securing electricity supply at the right level to cope with more penetration of intermittent RES generation. This is even more important if the level of electrification is higher than today. As such, the exemption from the notification requirement should take the context of energy system integration into account and the contribution to the security of supply of renewables and low-carbon gases in the energy transition of some EU regions, especially those ones that don't have access to hydro or nuclear, depending on national specificities and the changes in their generation mix. Therefore, **Eurelectric would recommend adding a requirement for the exemption from the notification based on the balancing test between positive and negative effects needs to consider the need to cope with three different objectives – cost-effective decarbonization, security of supply and cost for consumers.**

Eurelectric pursues in all its activities the application of the following sustainable development values:

Economic Development

- Growth, added-value, efficiency

Environmental Leadership

- Commitment, innovation, pro-activeness

Social Responsibility

- Transparency, ethics, accountability



Union of the Electricity Industry - Eurelectric aisbl  
Boulevard de l'Impératrice, 66 – bte 2 - 1000 Brussels, Belgium  
Tel: + 32 2 515 10 00 - VAT: BE 0462 679 112 • [www.eurelectric.org](http://www.eurelectric.org)  
EU Transparency Register number: [4271427696-87](https://ec.europa.eu/transparency/regexpert/?s=details&id=4271427696-87)