

Siemens Energy welcomes the roadmap consultation Targeted review of the General Block Exemption Regulation (GBER) on State aid, and the opportunity given to stakeholders to contribute to the update of the current Regulation.

Below, please find our comments and proposed changes on the consultation document:

Article 2 Definitions

(102e) Hydrogen generation from waste incineration should be considered as green or low-carbon Hydrogen

(103)(a)(iv) Artificial Intelligence should be included explicitly, adding to the text:

“smart electricity grids, that is to say systems and components integrating information and communications technology (‘ICT’), through operational digital platforms, **Artificial Intelligence**, control systems...”

(103)(b)(v) Similar to the above point, Artificial Intelligence should be included explicitly, adding to the text:

“smart gas grids, which means any of the following equipment or installation aiming at enabling and facilitating the integration of renewable and low-carbon gases (including biomethane or hydrogen) into the network: digital systems and components integrating ICT, control systems, **Artificial Intelligence**, and sensor technologies...”

Article 4 Notification thresholds

1. (a) We recommend increasing notification thresholds for **climate-neutral technologies** to **€200 million** with the option for an ex-post control mechanism for the European Commission.

(i) We recommend introduction of another subtopic here (vii), in which the Commission issues clear and ambitious provisions on sandboxing that cover, inter alia, a state aid exception that create more legal clarity about how industrial-scale sandboxes can be implemented.

2. Clarification should be given to the existing and proposed rules for the cumulation of aid, including a provision that generally allows the cumulation of aid for climate-neutral technologies.

Furthermore, exempting producers of renewable electricity-based hydrogen from network charges and environmental taxes should be compatible with the EEAG. The European Commission should also proactively pursue a dialogue with Member States to ensure that national refinancing mechanisms for the energy system transformation are fair and transparent, and most importantly, that they don’t undermine the EU’s long-term climate goals.

Article 6 Incentive effect

3. (a) We recommend that regions with an adopted plan to phase out coal in line with the European climate targets should benefit from more favorable aid conditions: for example, **an increase in aid intensity of 10 to 15 percent.**

Article 8 Cumulation

2. We suggest streamlining the rules for the cumulation of aid, including a provision that generally allows the cumulation of aid for climate-neutral technologies.

Article 26a Investment aid for testing and experimentation infrastructures

1. To what extent (and under which circumstances) the costs for prototype units are considered?

Article 36 Investment aid for environmental protection, including climate protection

1. 1a: We recommend that hydrogen from waste incineration plants with biogenic fuel is considered renewable.
2. 2a. (a) The costs for the geological qualification and acceptance of a storage site, as well as the expenditures for safety measures should be included.
3. New EU standards are a moving target. The EC should be clear and transparent on how to make sure that we can comply with moving targets.
6. The revision should make possible that co-funding is allowed **up to 100%, even without a bidding process.**

Article 38 Investment aid for energy efficiency measures

2. The revision should ensure that new funding is allowed also for measures to reach current standards.

Article 41 Investment aid for the promotion of energy from renewable sources, renewable hydrogen and high-efficiency cogeneration

7. (a) The document should make clear what the **definition of high-efficient cogeneration** is, as well as what would be the thresholds in defining high-efficiency.
(b) It should be made clear whether 'electricity storage' is referring only to batteries, or, as we would suggest, also to **Power-2-X.**

Article 42 Operating aid for the promotion of electricity from renewable sources

2. Clarity is needed on the procedure to execute and document the **bidding process**, as well as how many bidders are sufficient.

Article 48 Investment aid for energy infrastructure

4. Clear indication should be given on what '[total] costs' means.
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