



# PROVIDING ACCESS TO THE GRID – REGULATORY OPTIONS AND PRIORITIES

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Is there a priority, from the regulative perspective, for connection to the grid among RES technologies and/or depending on the RES plants developers, particularly in case of limited the grid capacities?



## ACHIEVING THE TARGET

The Renewable Energy Directives sets rules for the EU to achieve its 42.5% renewables target by 2030 to be achieved through sophisticated and evolving mechanism such as:

- Market planning and design
- State aid such as investment and operational support mechanisms, supporting innovation etc.
- Increasing the capacity by planned developing of the grid
- Speeding up of the RES projects licensing procedure including access to the grid

Initially, the EU Directives addressed priority for all RES technologies:

*Electricity Directive 1996/92/EC “Without prejudice to the maintenance of the **reliability and safety of the grid**, Member States shall take the necessary measures to ensure that TSOs and DSOs in their territory guarantee the transmission and distribution of electricity produced from RES. They may also provide for priority access to the grid system of electricity produced from RES.”*

*Second RED 2009/28/EC Member States shall also provide for either priority access or guaranteed access to the grid system of electricity produced from RES.*

**GUARANTEED  
OR PRIORITY  
ACCESS**

The Fourth Energy Package (Electricity Directive 2019/944, Regulation (EU) 2019/943:

*Thus, these out-of-market support needs to be further reconciled with electricity market legislation. With the movement to electricity market legislation, most promotion schemes in previous legislative packages have been abolished or only allowed in limited cases .*

*The European Commission is committed to policies that will contribute to the European Green Deal ambition of achieving carbon-neutrality by 2050. While each EU country chooses its own energy mix, there are common rules that apply to the EU energy market.*

When providing priority access or dispatch for high-efficiency cogeneration, Member States may set rankings as between, and within different types of, renewable energy and high-efficiency cogeneration and shall in any case ensure that priority access or dispatch for energy from variable renewable energy sources is not hampered (Energy Efficiency Directive 2012/27/EU)

**ABOLISHING  
PRIVILEGES**



**PROMOTING  
RES  
TECHNOLOGIES**

**Wind energy** is a mature and competitive renewable energy source in the EU, and key to achieve its renewable energy targets.

**Solar power** is a safe and cost-competitive renewable energy source. The EU solar energy strategy will contribute to repowering the EU.

**Biomass and biofuels** help to lower the EU's external energy dependence and contribute to reducing greenhouse emissions.

**Hydropower** is derived from flowing of water that powers a turbine. It is one of the oldest sources of renewable energy, having been used already in pre-industrial times

**Innovative technologies:** MS shall set an indicative target of at least 5% of newly installed RES technologies by 2030. Recommended regulatory learning such as “sand box”. MS shall promote the testing of innovative RES technologies for production and storage through pilot projects in a real-world environment, for a limited period.(Third RES)



**PROMOTING  
CERTAIN  
DEVELOPERS**

## Consumers and energy communities

MS shall put in place an enabling framework to promote and facilitate the development of RES self-consumption .../ energy communities...(Third RED)

MS shall ensure that active customers that own an energy storage facility: (a) have the right to a grid connection within a reasonable time after the request, provided that all necessary conditions, such as balancing responsibility and adequate metering, are fulfilled (Directive 2019/944 on internal market)

MS shall ensure that their competent authorities include provisions for the integration and deployment of RES energy, including for RES self-consumption and renewable energy communities, ... (Third RED)

MS shall establish a simple-notification procedure for grid connections.....



**PROMOTING  
CERTAIN  
AREAS**

## Renewables acceleration areas (2023 RED amendments)

specific location or area, whether on land, sea or inland waters which a MS designated as particularly suitable for the installation of RES plants. Accelerated licensing procedure. By 21 May 2025, appropriate rules on effective mitigation measures for the installation necessary for the connection of such plants and storage to the grid. Duration of the licensing procedure 12 months (Third RED amended)

### Offshore

Renewable energy of the seas can provide a steady power output and contribute to reaching the EU's climate and energy goals. Duration of the licensing procedure 2 years + 6 months extension.

The Commission's EU strategy on offshore RES COM(2020)741 sets targets for an installed capacity of at least 60 GW of offshore wind by 2030 and proposes concrete ways forward to support the long-term sustainable development of this sector.



# PROMOTING STORAGE AND ELECTROMOBIL ITY

## RES STORING

is key for an increased RES energy production, energy efficiency and for energy security. It may adjust demand and supply by allowing excess electricity to be saved in large quantities over different time periods, reduce price fluctuations, and lower electricity prices during peak times.

MS should identify any specific actions, regulatory and non-regulatory, necessary to remove barriers to the deployment of demand response and behind-the-meter storage ( the Commission Recommendation Energy Storage = underpinning a decarbonized and secure EU energy system.

## ELECTROMOBILITY

EU strategy includes speeding up the deployment of low-emission alternative energy for transport, such as RES electricity and removing obstacles to the electrification of transport, as well as moving towards zero-emission vehicles.

The operation of non-publicly accessible normal recharging infrastructure is particularly important for the integration of electric vehicles in the electricity system as it is located where electric vehicles are parked (Third RED)



## RES PPA'S

PPAs with energy intensive industry and supplier

- PPA: *Industry accounts for 25 % of the Union's energy consumption*
- *Member States shall **remove unjustified barriers to, and promote the uptake of, such agreements.** They shall also provide, in those progress reports, an indication of renewable energy generation that is supported by the RES PPA's (Third RED)*
- *The market for RES PPAs is **still limited** to a small number of MS and large undertakings, with significant administrative, technical and financial barriers remaining in large parts of the Union's market (2023 revised RED)*

And they all want to be connected to the grid !



# GRID ACCESS PRINCIPLES

## The grid Operator should

- maintain the reliability and safety of the grid
- establish and publish objective, transparent, proportionate and efficient procedures for non-discriminatory connection
- streamline and expedite administrative procedures with predictable timeframe (MS should limit the duration of the whole licensing procedure 2+1 year).
- use operational tools such as demand/ respond flexibility, limiting dispatching, balancing etc.
- It may limit the guaranteed connection capacity or offer connections subject to operational limitations, in order to ensure economic efficiency regarding new generating installations or energy storage facilities, provided that such limitations have been approved by the regulatory authority



## EXAMPLE OF GREECE

List of RES categories for priority connection to the grid:

- Transmission system: acceleration areas and strategic investments; PPAs; energy communities; RES with internal storage; HE CHP, biomass, small HPP, geothermal, roof PV, offshore wind, other. Parallel processing: waste, prosumers etc.)
- Distribution system: waste, pilot offshore PV, biomass by farmers, technology innovation research programs, prosumers with set-off, prosumers with virtual set-off, small HPP in water canals, roof PV, energy communities, other.

Adjustment of the list:

- Promoting of the PPAs
- Speeding up of connection of storage plants,
- Including RES with external storage in the 4<sup>th</sup> priority group
- Connecting hybrid plants to saturated grids



**EXAMPLE OF  
GREECE**

New announced amendments and measures:

- Placing standalone batteries high in the connection priority list
- Options for simple PV with connection terms: a) to have reduced input up to 50% at certain hours or b) to add (preferable) internal storage to the production unit
- Open issues for the industrial PPAs priorities

Amendments in regulation of priority however justified by technical requirement nevertheless affect:

- Project planning and securing of financial support
- A posteriori changing of technologies
- Amendments of the issued licenses and prolonging procedure
- General legal security and predictability

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Lead of Rokas' Energy Group, Mira has more than 20 years experience in energy law including on large-scale multiple jurisdictional projects, involving also regulatory, dispute resolution issues as well as cross-border matters. She has been engaged in different aspects of energy law cases, including unbundling and liberalization of energy markets; energy trade and energy supply issues, project financing; licensing of energy entities and other regulatory and pricing issues; EU acquis compliance studies about RES and Public Procurement in Energy; as well as certain issues of hydrocarbons concession law. She supervises Rokas' offices of SEE, particularly concerning energy law issues.

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**THANK YOU**