

Stellungnahme der Bundesgeschäftsstelle Energiegenossenschaften beim DGRV zum Konsultationsverfahren zur neuen europäischen Erneuerbaren-Energie- Richtlinie

Stellungnahme der Bundesgeschäftsstelle Energiegenossenschaften zu den für die Energiegenossenschaften relevanten Fragen aus dem Konsultationsverfahrens:

2. How should stability, transparency and predictability for investors be ensured with a view to achieving the at least 27% renewable energy target at EU level? Any other view or ideas? Please specify.

Stability, transparency and predictability are of utmost importance for all stakeholders who are active in the field of renewable energy. 850 German energy cooperatives operate systems in the fields of photovoltaic, wind, biomass and biogas in areas as diverse as energy generation and supply through to district heating and marketing activities. These cooperatives have already invested around €1.67 billion in renewable energy in the last ten years from whom a great amount has been financed by cooperative banks. Many of the 7.800 German cooperatives especially agricultural, commercial and housing cooperatives are also active in the field of renewable energy and energy.

All of these cooperative stakeholders need a reliable political and regulatory framework. Furthermore, protection of legitimate expectations and grandfathering is also crucial. Subsequent interventions are not only legally problematic and intervene in concluded investments and financing, but also destroy a positive investment climate.

In addition, it is very important – besides having a long-term decarbonisation strategy – to establish binding targets and milestones of renewable energy for the electricity, heating, cooling and transport sector for the years 2020, 2030, 2040, 2050. These measures would also enhance predictability of investments in the renewable sector. The increase of renewable energy is one of the central instruments for decarbonizing the entire energy system and also contributes significantly to the achievement of our climate targets.

4. What should be the geographical scope of support schemes, if and when needed, in order to drive the achievement of the 2030 target in a cost-effective way?

- Harmonised EU-wide level support schemes
- Regional level support schemes (group of Member States with joint support scheme)
- National support schemes fully or partially open to renewable energy producers in other Member States
- Gradual alignment of national support schemes through common EU rules

x National level support schemes that are only open to national renewable energy producers

The geographical scope of support schemes should be on a national level and only promote national renewable energy producers.

| 11. How would you rate the importance of the following barriers for consumers to produce and self-consume their own renewable energy? | | | | | |
|---|------------------------|-------------------|----------------------------|-----------------------|------------|
| | Very important barrier | Important barrier | Not very important barrier | Not important barrier | No opinion |
| Self-consumption or storage of renewable electricity produced onsite is forbidden | | | | | |
| Surplus electricity that is not self-consumed onsite cannot be sold to the grid | | | | | |
| Surplus electricity that is not self-consumed onsite is not valued fairly | x | | | | |
| Appliances or enabler for thermal and electrical storage onsite are too expensive | | | | | |
| Complex and/or lengthy administrative procedures, particularly penalising small self-consumption systems | | | | | |
| Lack of smart grids and smart metering systems at the consumer's premises | | | | | |
| The design of local network tariffs | | | | | |
| The design of electricity tariffs | | | | | |

Other? Please explain.

Self-consumption is also very important for energy cooperatives. Energy cooperatives are the only entity in which producer and consumer of (renewable) energy are linked and work together. In Germany, the development of decentralized projects using PV systems or CHP, where the power is produced and consumed locally, without the use of the grid, has been legally and economically restricted. The installation of renewable power plants, which produce and deliver locally, without the use of the grid, is one of the most important business models of energy cooperatives. They furthermore embody one of the most significant business concepts of energy cooperatives as they deliver renewable power from their own plant to their members for a favourable price. In most cases, it is not economically viable to deliver the power produced by a PV system to the members of the cooperative that owns it. From an economical point it is also not viable to build new renewable power plants by selling the produced renowa-

ble electricity to the members of the cooperative. Economical barriers for these kinds of projects are e.g. the legislative rollout of smart meters for households and renewable power plants, the legal compulsion to pay the full national German renewable energy surcharge and the political considerations that decentralised renewable projects have to pay a higher network charges. If energy cooperatives would be able to conduct such projects, it would not only enhance energy knowledge among citizens but also increase the general social acceptance.

12. In general, do you think that renewable energy potential at local level is:

- Highly under-exploited**
- Under-exploited
- Efficiently / fully exploited
- Over-exploited (i.e. beyond cost-effectiveness)
- No opinion

Renewable energy potential at local level is highly under-exploited.

13. How would you rate the importance of the following barriers that may be specifically hampering the further deployment of renewable energy projects at the local level (municipalities and energy cooperatives):

| | Very im- portant barrier | Important barrier | Not very im- portant barrier | Not important barrier | No opinion |
|---|-----------------------------|----------------------|---------------------------------|--------------------------|------------|
| Lack of support from Member State authorities | x | | | | |
| Lack of administrative capacity and/or expertise/ knowledge/information at the local level | | | | | |
| Lack of energy strategy and planning at local level | | | | | |
| Lack of eligible land for projects and private property conflicts | x | | | | |
| Difficulties in clustering projects to reach a critical mass at local level | | | | | |
| Lack of targeted financial resources (including support schemes) | x | | | | |
| Negative public perception | | | | | |

Other? Please explain.

In Germany, one of the main deterrents of renewable energy projects at local level is the introduction of mandatory auctioning starting in 2017. This creates new barriers to the development of projects by energy cooperatives and other small businesses (see the definition for SMEs of the European Commission), especially for wind energy and industrial ground-mounted photovoltaic-systems. By refusing to fully use of the so-called *de minimis rule* of the Guidelines on State aid for environmental protection and energy 2014-2020 of the European Commission for wind energy, the German administration is de facto hindering competition. Usually energy cooperatives develop small projects in their regions, one at

a time, and are therefore not able to divide project costs and risks between different projects simultaneously. Therefore these cooperatives stand to lose the range of €189,000 and €315,000¹ for each wind power plant that does not win the bid. This means that energy cooperatives and other small businesses will not be able to participate in the wind energy and industrial ground-mounted photovoltaic-systems market anymore as they cannot handle the risk of project (loss of project investment if the project cannot be conducted) and the auctioning risk (loss of project investment if the project can be conducted but does not win the bid).

¹ Numbers are based on the study "Marktanalyse – Windenergie an Land" of the Leipzig Institut for Energy assigned by the Federal Ministry of Economic Affairs and Energy from 18th February 2015, p. 4 and the study "Dauer und Kosten des Planungs- und Genehmigungsprozesses von Windenergieanlagen an Land" of the Onshore Wind Energy Agency from January 2015, p. 2-3; The average installed capacity of a new wind power plant in 2014 in Germany: 2,7 MW, the average costs from the pre-analysis to the definitive permit according to German Federal Emission Control Act: 70-115 €/kW planned installed capacity.

14. Please rate the appropriateness of stronger EU rules in the following areas to remove barriers that may be specifically hampering the further deployment of renewable energy projects at the local level :

| | Very appropri- ate | Appropriate | Not very ap- propriate | Not appropriate | No opinion |
|---|-----------------------|-------------|---------------------------|-----------------|------------|
| Promoting the integration of renewable energy in local infrastructure and public services | | | | | |
| Supporting local authorities in preparing strategies and plans for the promotion of renewable energy | | | | | |
| Facilitating co-operation between relevant actors at the local or municipal level | x | | | | |
| Facilitating access to targeted financing | x | | | | |
| EU-wide right to generate, self-consume and store renewable electricity | | | | | |
| Measures to ensure that surplus self-generated electricity is fairly valued | x | | | | |
| Harmonized principles for network tariffs that promote consumers' flexibility and minimise system costs | | | | | |

17. Please rate the most effective means of addressing these barriers and advancing the decarbonisation of EU heating and cooling supply. Other? Please specify and explain. How could such measures be designed?

Since 2006 around 140 cooperative district heating systems were created in Germany. Most of these projects use the heat from local biomass plants and have been able to replace the old fossil heating systems. A lot of these projects are under an economical threat due to the expiration of the twenty year feed-in-tariff pursuant to the German renewable support scheme of the biomass plant and thereby the loss of the main heating source. In addition new cooperative district heating systems are not conducted as the existing biomass plants will be demolished after the twenty year feed-in-tariff as the plants cannot run without support due to the costs of the raw materials. New cooperative district heating systems amortise after 15 years and a lot of these biomass plants are older than 5 years now. Therefore a solution is needed, how biomass plants which meet certain criteria like a proper system of using the produced heat e.g. for district heating systems can be supported beyond the twenty years. Such a solution would also increase the renewable energy share in the heating sector significantly and further decarbonise the heating sector as the heat of many of these biomass plants would be used properly.

26. How can public acceptance towards renewable energy projects and related grid development be improved?

The active participation of citizens in the energy transition, through cooperatives and other entities which are governed and managed by citizens, has been identified as the major factor in improving social acceptance of renewable energy projects. Enabling local community ownership without great complexity and increasing local added value has become an important issue. Furthermore, energy cooperatives enhance energy knowledge and appreciation for the energy transition among normal people as it is one of the least options whereby citizen can conduct renewable business on its own. In Germany, one of the main deterrents of renewable energy projects at local level is the introduction of mandatory auctioning starting 2017. This system poses new market barriers to the development of projects by energy cooperatives and other small businesses, especially for wind energy and industrial ground-mounted photovoltaic-systems. By refusing to entirely use of the so-called *de minimis rule* of the Guidelines on State aid for environmental protection and energy 2014-2020 of the European Commission for wind energy, the German administration is de facto hindering the development of further cooperatives and thus endangering social acceptance. However the introduction of mandatory auctioning is not the only reason which restricts the business opportunities for energy cooperatives and the establishment of further energy cooperatives. All the other reasons have been explained in question 2, 11, 13 and 17.

Moreover, a higher transparency as well as a better consultation processes with respect to planned projects and political decisions in general can also increase the public acceptance towards renewable energy projects and related grid projects

Die Bundesgeschäftsstelle Energiegenossenschaften vertritt die Interessen von etwa 850 (Mitglieds-)Energiegenossenschaften mit über 150.000 Mitgliedern. Sie wird vom DGRV – Deutscher Genossenschafts- und Raiffeisenverband e.V. gemeinsam mit dem Baden-Württembergischen Genossenschaftsverband e. V., dem Genossenschaftsverband e. V., dem Genossenschaftsverband Bayern e. V., dem Genossenschaftsverband Weser-Ems e. V. und dem Rheinisch-Westfälischen Genossenschaftsverband e. V. getragen.

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