

QUESTIONNAIRE

PARTICIPANT

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Name of organisation: Elektrodistribucija DOOEL Skopje

Country of organisation: Republic of North Macedonia

QUESTIONS

Question 1: Yes

Comment: It should be provided transparency and cost-reflectivity of network tariffs is not affected. Exemption of the balancing responsibility for self consumers put additional burden to DSO costs, so it has to be provided that self-consumers contribute fairly to coverage of the DSO costs as other network users, Convenient Network Tariff Systems has to be in place.

Question 2: Do not know

Comment: As it is relatively new topic for the EnC Contracting parties it is difficult to assess the effectiveness of the existing framework aiming to promote development of the renewable self-consumption. Seems that the regulation in place often is incomplete or it address certain issues insufficiently. For example, in North Macedonia most of the regulation promoting self-consumption is in place (criteria, procedures, remuneration, etc.), however, network tariffs are still volumetric, therefore, tariff system for distribution of electricity have to be conveniently adjusted, in line with the recommendations

Question 3: Yes

Comment: I believe that the Draft Policy Guidelines is providing sufficient scope of recommendations which should promote development of self-consumption. However, influence of specific natural, social and economic environment in each of the Contracting Parties has to be considered when sets of recommendations are finally transposed in the national frameworks so that effects could be maximized.

Question 4: Legal and regulatory framework

Comment: I believe that comprehensive and functional legal and regulatory framework is the key for effective promotion of self-consumption, provided that it should not only include pure transposition of the directives but the same should be customized to adjust to the specific environment. This is mostly relevant for the secondary legislation which has to provide detailed guidance for the procedure, remuneration, technical requirements, etc.

Question 5: Yes

Comment: Support schemes are important to raise the economic attractiveness of the self-consumption concept. Net billing schemes should be preferred as they provide remuneration for the self consumers for the electricity fed in to the distribution network and yet, the same has significantly lower impact over the transparency and cost reflectiveness of the distribution tariffs.

Question 6: Do not know

Comment: When most of the final consumers in the Contracting Parties think about the self-consumption they are primarily driven by the economic benefits and justification of their investment to become self-consumers. Customer awareness should be increased also upon the role of the self-consumer in decarbonisation aspects and fulfilment of their country obligations. Promotional campaigns will certainly contribute towards the increase of the customers awareness.

Question 7: Remuneration schemes have to be introduced very carefully, in order to fulfill their aim to bring additional value to the self-consumers and hence to raise their interest. However, the same should not be seen as a primary goal for the self-consumer – instead of constructing units for self consumption, the same to be incentivized to develop such units for market actions.

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DISCLOSURE

Do you agree with the publication of your contribution: YES

QUESTIONNAIRE

PARTICIPANT

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Country of organisation: Slovenia

QUESTIONS

Question 1: Yes

Comment: Also self supply in other matters like food or mobility is becoming significant based on availability of modern technologies.

Question 2: Yes

Comment:

Question 3: No

Comment: The system consisting of traditional supply and self-supply should be harmonised, probably the best at pricing.

Question 4: Charges, taxes and levies

Comment: All addressed issues are considered important, one can not be without the other. However, a driving force behind is financial.

Question 5: Yes

Comment: In the sence of self participation, those should be somehow empowered.

Question 6: Do not know

Comment:

Question 7:

Comment:

DISCLOSURE

Do you agree with the publication of your contribution: YES

QUESTIONNAIRE

PARTICIPANT

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Name of organisation: ITN SASA

Country of organisation: Serbia

QUESTIONS

Question 1: Yes

Comment: Democratization of energy pillar.

Question 2: No

Comment: Legal framework is lagging behind technological options.

Question 3: Yes

Comment: Good for the start.

Question 4: Legal and regulatory framework

Comment: The essence has to be over the form!

Question 5: Yes

Comment: Governments lack of sustainable investments and corona recovery plans.

Question 6: No

Comment: Not enough.

Question 7: The WB countries are at different level...

Comment: The WB countries are at different level...

DISCLOSURE

Do you agree with the publication of your contribution: YES

QUESTIONNAIRE

PARTICIPANT

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Name of organisation:

Country of organisation: Bosna i Hercegovina

QUESTIONS

Question 1: Yes

Comment: As we know EU ambitious targets for renewables, including self-consumption and biofuels, were agreed! There is no doubt that the EU has realized that self-consumption can significantly contribute to achieving 2030 targets. In the narrative, the term must be used for self-consumption. According to the provisional deal, member states must ensure that an EU consumer is entitled to become a renewable self-consumer, who may: generate renewable energy for their own consumption, store and sell excess production; install and operate electricity storage systems combined with installations generating renewable electricity for self-consumption, without liability for any double charge; not to be subject to any charge or fee on self-consumed energy until 2026, with some limited exceptions foreseen thereafter; receive remuneration for the self-generated renewable electricity they feed into the grid;

Question 2: No

Comment: The existing legal framework in most member states of the Energy Community, I believe, does not legally define self-consumption in the way it is defined by the Renewable Directive. The legal framework must be hierarchically regulated by the implementation of Directive 2019/944, then Directive 2018/2001, etc ...

Question 3: Do not know

Comment: Policy guidelines are of very high quality but are exclusively related to the self-consumption segment or better to say "Grid integration of Prosumers". In terms of its purpose, suppose it is an approach in which you need to build a house, and you have only made a plan about where and what your kitchen will be like. Definitely the Policy guidelines are of good quality but its usefulness will come to the fore later.

Question 4: Legal and regulatory framework

Comment: Elaboration is in question 2.

Question 5: Yes

Comment: The preamble to the Renewable Directive in paragraphs 16 to 30 provides an answer to that question.

Question 6: No

Comment: I believe that the notion of energy communities of citizens established by Directive 2019/944 must be promoted more actively in parallel with the promotion of self-consumption from renewable energy sources established by the Renewable Directive.

Question 7: The self-consumption guidelines need to be redrafted. I propose a much broader approach to explaining the concepts of the energy community of citizens, self-consumers from renewable energy sources as well as a clear and unambiguous explanation of the benefits that citizens members of the Energy community can have. Technical requirements, market access, network access will be automated processes once the legal and financial framework for self-consumption is established.

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DISCLOSURE

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QUESTIONNAIRE

PARTICIPANT

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Country of organisation: Bosnia & Herzegovina

QUESTIONS

Question 1: Yes

Comment: Regarding the cultural and socioeconomic background of most of the contracting parties, renewable self-consumption is definitely the main and most realistic way in which citizens and local communities can contribute to the energy transition and the achievement of the 2030 targets. On one side, having in mind that population is not that concentrated in urban areas as in central/western Europe, decentralized renewable self-consumption is definitely the most energy efficient and a significantly cost-effective affordable way for citizens to deploy and boost renewable energy production, through on-grid small renewable installations, rather than the current centralized big scale investments subsidized using levies paid by citizens as FiT. Besides, the current context is unfortunately not at all positive to other ways of involving citizens and their resources in renewable energy production through common investments or common projects as renewable energy communities/cooperatives are.

Question 2: No

Comment: The existing framework in the Contracting Parties is definitely not contributing to the development of renewable self-consumption, rather it is discouraging it, in my opinion: Legislation and regulations are either not recognizing self-consumption (as in FBiH in BiH) or offering an complex, inconsistent and incomplete framework (as in RS in BiH) which leads to the fact that in practice, it is almost impossible for a customer to become a Prosumer, especially when talking about small-scale household renewable self-consumption installations. A well structured, coherent and consistent framework, with a systematic and integral approach, and recognizing and setting conditions for different kinds and levels of renewable self-consumers is definitely needed.

Question 3: Yes

Comment: Although this draft Policy Guidelines are addressing the most relevant issues as defined in the Clean Energy for all Europeans Package (CEP), in my opinion they lack to include issues which are specifically important in the contracting parties context. For example, jointly acting renewable self-consumers might have an special relevance in the contracting parties in different terms as in is defined in CEP and in these guidelines it is definitely not well enough developed – We have to point out here that the most of the renewable potentials are concentrated in rural areas in which citizens are rather going to act as renewable self-consumers than collectively as renewable energy cooperatives. In these terms, jointly acting renewable self-consumers has an specific potential which is currently missing as being restrictively defined as located in the same building or multi-apartment block.

Question 4: Access to the market

Comment: All these addressed issues are deeply interrelated and should be defined in a consistent, comprehensive and integral manner, focused in the development and deployment of renewable self-consumption potentials – This is in my opinion a major issue: the renewable self-consumption system consistency regarding all these different levels - contracting parties legislation and regulation commonly lacks consistency in “innovative” matters, as renewable self-consumption is, in the whole energy market context. This lack of consistency makes the practical implementation rather complicated and so, quite unsuccessful (remaining this innovative options as singular and irrelevant in the whole system). In my opinion a core element in a consistent definition of a renewable self-consumption system is the self-consumers market and network integration and the relations established to peers, aggregators, suppliers, DSO's & TSO's, especially in what refers to netting and network costs.

Question 5: Yes

Comment: Support schemes absolutely should be used to promote & facilitate the deployment of small-scale renewable self-consumption, specially for household citizen-owned systems, where lays undoubtedly a great potential both in terms of renewable production and energy efficiency. Though, this support schemes should not be in any case based on feed-in tariffs but on direct financial support to the investment as this is the main barrier to household and small-scale renewable installations on one side, and netting (net-billing as alternative to net-metering and their negative effects) together with reduction or exemption from taxes and levies (especially RES deployment stimulation levies) in a frame that assures the renewable self-consumer the right to feed electricity excess to the grid (and DSO's obligation to purchase it) on stable financial conditions which can guarantee citizens that renewable self-consumption is going to be at least affordable (when not profitable) also at short/medium term

Question 6: No

Comment: In what governmental institutions refer, at least in BiH and Serbia, few or none political measures, programs or initiatives are undertaken to promote actively final customers awareness renewable self-consumption possibilities. Citizens and Non-governmental organizations are actually the only ones promoting self-consumption, usually not being a central topic agendas, unfortunately. In that sense, more renewable self-consumption active promotion programs, projects and activities are definitely needed, and it would be desirable that the European Commission and the Energy Community secretariat fosters this promotion through pilot project experiences and best practice examples.

Question 7: I would like to clarify here some comments written above. I would begin with the “Jointly acting renewable self-consumers” issue: Being considered that most of the potential for renewable energy production lies in rural areas, which, in the contracting parties, are still populated a relevant amount of citizens, means that Rural communities has a huge potential for renewable self-consumption which, combined with energy storage installation, can bring very positive effects in terms of energy efficiency and improvement of energy deprivation situation which are affecting such areas (contributing to increase their sustainable economic development potentials), as well as contributing to the increase of the renewable share in the whole grid. In such areas, and with that purpose “Jointly acting renewable self-consumers”

can be the formula boosting renewable self-consumption in short-medium term, regarding the current cultural, legal and financial barriers that “energy cooperatives” have, at least, in the Western Balkans. In that sense, inhabitants in a small rural settlement could act jointly as an energy island, even installing commonly PV panels in a common public building, in the best roof or in a common field with the best conditions, without the need of forming a cooperative for it. This set in currently not possible in the way “Jointly acting renewable self-consumers” is defined in CEP, which corresponds to a central/western-European conception of “urban” collective prosuming.

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