

Brussels, 2nd November 2021

Dear Commissioner,
Dear Director General,
Dear Director,
Dear all,

The European power industry, represented by Eurelectric, is committed to be a driving force in delivering a cost-effective energy transition by powering the European Green Deal. Going forward, we welcome the current revision of the Trans-European Networks-Energy Regulation (TEN-E Regulation).

Eurelectric welcomes the revision's proposal, and in particular the series of new provisions which aims at simplifying and fast tracking the permit granting process. With this letter, we would however like to raise awareness on three remaining key points in the framework of the ongoing political trilogue negotiations, which need urgent attention.

PCI eligibility for decentralized projects: With the Green Deal objectives, the EU will have to significantly scale up renewable electricity generation to reach a share of more than 80% of electricity production from renewable energy sources by 2050. In this respect, we expect to see an [additional 510 GW of renewables to be traded across European networks –70% of which will be connected at distribution level](#). Hence, we call on the Council to ensure that the TEN-E Regulation truly supports projects contributing to the energy and climate objectives. It implies acknowledging the needed transformation of the distribution systems and adopting a wider integrated system approach to drive local infrastructure projects which benefit from the contribution of prosumers and new technologies at distribution level, demand side response, and electro mobility. As proposed by the Parliament, the TEN E Regulation **should thus enlarge the eligibility for PCI status of decentralised projects under the “Smart electricity Grids projects” categories where they offer replicability across the EU or synergies for Member States.**

Eligibility scope for offshore renewable projects: Secondly, while we strongly support a coordinated approach to the long-term deployment and integration of offshore renewables between two or more member states, we regret that the Council's proposal does not include the **development of electricity transmission infrastructure from offshore wind farms connected radially and demonstrating a cross-border impact as potential PCIs.** We believe that prioritizing only offshore grids for renewable energy having dual functionality of transmission and interconnection as well as traditional electricity interconnectors contradicts the ambitious objectives of the EU Offshore Renewable Energy Strategy since the majority of infrastructure will still base on radial connection.

Finally, we believe that the current eligibility criteria applicable to the category of “**Projects of Mutual Interests**”, should be relaxed until the project respects the decarbonisation objectives of the Union and those of the third countries involved. More concretely, **we call on the Commission to align its position on the Council’s proposal which suggests that a project can be eligible to PMI Status if it demonstrates a significant net socio-economic benefits with only one Member State (instead of two) and at least one third country. This would facilitate the implementation of projects notably led by Third Countries which have developed close and long-term relationship with the EU and which are committed to similar decarbonisation objectives.**

We remain at your disposal to further discuss the content of the present letter,

Yours sincerely,



Henning Häder
Director Policy Issues