

Brussels, 17 November 2021

Dear President Ms von der Leyen,
dear Vice Presidents,
dear Commissioners,
dear Cabinet Members,

We got to know that the College will soon decide on the final State Aid Guidelines for Climate, Energy and Environment (CEEAG).

We would like to first underline our true appreciation on all the open discussions we could have with the colleagues of DG COMP.

EREF as voice of independent power producers from all renewable sources always calls for utmost flexibility and strong support for renewable energy communities and small and medium sized company's projects. You may find our detailed position paper via this [link](#).

Especially in view of the meagre outcome and disappointing results from Glasgow, the European Union needs to enable a lot of own renewable energy development, even more than predicted in order to help the world to remain habitable.

In order to meet the goals under the Green Deal, the competition rulebook of the European Commission must be modernised and adapted so that investment into the green energy transition is facilitated and granted with greater flexibility. Member States should be free to decide, just like in other policy areas, through which system they grant support in order to find the most efficient pathway to achieve the European renewable targets by 2030 and not be obliged to use an auctioning system.

We outlined that the future guidelines have to provide that smaller projects well beyond the current meagre threshold of 1 MW exemption for RES production should be excluded from mandatory auctioning systems. Due to the climate urgency and to the development of the technologies, the current thresholds should be raised to 10 MW for most renewable technologies and for wind energy 10 turbines with a capacity of 6 MW each. The current guidelines foresee in Para 127 for electricity from wind energy, for installations with an installed electricity capacity of up to 6 MW or 6 generation units to be able to be exempted from auctioning rules. This 6 MW size per

turbine will be the standard within the period of the next 5 years. These projects are within the possible limit that medium sized companies can realise.

For the sake of rapid further uptake of wind energy we hope that an improved exemption for wind energy in general – not only for SMEs should be maintained in the guidelines and should be increased following our suggestion above.

Moreover, our members from the sustainable use of biomass are worried: The aid schemes for biogas and bio methane across the EU have never been harmonised and the interplay between the schemes has not been considered in the EC's decisional practice thus far. The aid schemes do not exclude the export of subsidised 'green gas' throughout the internal EU market. The lack of harmonisation and the export of subsidised 'green gas' to other EU countries result in distortive effects and double subsidies. We hope the new guidelines will have provisions to block such deviations. Thus, the revised CEEAG **have to determine explicitly the control of no double/multiple subsidisation in compliance with related provisions of the current Renewable Energy Directive (RED II)**. If not, the lack of control and obligation to avoid double/multiple subsidisation will have fatal and chaotic consequences on the upcoming European renewable gas market, in which biomethane as well as hydrogen cross-border flows are crucial to deliver the EU climate targets.

Please reflect on our position before deciding on the new guidelines, gaining more security that these guidelines provide enough flexibility and investment security and job options so that the European Union can reach its 2030 targets and show to the world that we mean it, when we proclaim to be Fit for 55. Thank you very much in advance.

With best wishes,



Dr. Dörte Fouquet
Director