



**NOTE ON THE DRAFT
FOR THE NATIONAL ENERGY AND CLIMATE PLAN (NECP)**

3 December 2018

The Draft for the NECP published by the Hellenic Government on 13.11.2018 includes a target for 55% share of Renewables in the Gross Final Electricity Consumption by 2030.

According to the scenario included in the NECP, this target will be achieved. Specifically, the above-mentioned RES-e share is projected to increase from 24% by 2016 to 56% by 2030 and to just 62% by 2040. The evolution of the generation capacity is projected as follows:

Installed capacity (GW)	2016	2020	2025	2030	Change 2016/2030	2040
Lignite	4,3	3,4	3,5	2,7	-1,6	1,3
Oil	2,5	1,8	1,5	1,4	-1,1	1,3
Natural Gas	3,9	5,2	5,2	5,4	1,5	4,6
Bio-energy	0,1	0,1	0,1	0,3	0,2	0,4
Hydro	3,4	3,4	3,7	3,9	0,5	4,0
Wind	2,4	3,4	4,2	6,4	4,0	7,3
PV	2,6	3,3	5,5	6,9	4,3	8,1
Solar Thermal	0,0	0,0	0,1	0,1	0,1	0,1
Geothermal	0,0	0,0	0,0	0,1	0,1	0,3
Total	19,2	20,6	23,8	27,2	8,0	27,4
New storage	0,0	0,0	0,0	0,7	0,7	0,7

The basic comments are the following:

- 1) The new capacity for wind is 4GW and for PV is 4,3GW until 2030. Although, these figures lead to 165% increase in relation to 2016, it seems that there is an underestimation of the required new installations. This is due to:
 - the very low projected electricity demand which is by 2030 slightly less than 2016 (61,5TWh vs 62,7TWh). It is noted that the NECP demand projection is by more than 16% less than the projection published by the System Operator two weeks ago.
 - the overestimation of the wind capacity factor. The NECP projects an improvement of the average CF from 24,5% by 2016 to 26,6% by 2030 and 27,8% by 2040.



- 2) Although the text includes special reference and policy directions for the promotion of wind offshore, it does not include any special target.
- 3) No special reference and no figures are provided for repowering of the existing wind installations.
- 4) A specific time-plan for the auctions of the new RES capacities is not included.
- 5) The text includes policy directions for the electrification of the economy. Especially, for the electric passenger vehicles, the NECP projects a 10,2% share by 2030 which seems to be too ambitious.

The Hellenic Wind Association has asked, among others, for the following:

- 1) The generous improvement of the mix of the policy measures and actions, in order to keep Greece on track after 2030. This is an absolute requirement as by the evolution of the scenario presented, it is obvious that the policy mix is inadequate after 2030. The additional measures should be designed and applied already from the beginning of the 2020 decade and should target to 60% RES-e by 2030 and >90% by 2050.
- 2) A Specific Action Plan with time-tables, intermediate targets and quantitative indices for the effective monitoring of the NECP execution.
- 3) The Action Plan should include a special Roadmap for Large RES investments i.e.
 - Large on-shore wind parks both at the mainland and islands/isolated islets
 - Storage systems, much earlier than 2025
 - Floating Offshore Wind, including at least 1-2 large scale projects for the beginning of the 2020 decade.
- 4) More ambitious plan for the interconnections of the islands, which will also lead to the rapid reduction of oil share in e-generation.
- 5) A vision for the international interconnections targeting to make Greece an exporter of green energy.
- 6) A clear plan for the auctions for new capacities.
- 7) Specific measures and procedures for repowering.
- 8) More analysis of the measures for the electrification.

HWEA considers that more work is required:

- for the preparation of the document to be submitted at the EC by the end of the year as per the Governance of the Energy Union, and especially
- for the further analysis, documentation and improvement of the draft NECP to be an adequate policy tool with alternative scenarios and management procedures.