

HELLENIC WIND ENERGY ASSOCIATION

**A GUIDE  
FOR LICENSING OF  
ONSHORE WIND  
PROJECTS IN GREECE**

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**HWEA**  
Hellenic Wind Energy Association

The Guide has been prepared by the Hellenic Wind Energy Association HWEA/ELETAEN for informative reasons. HWEA has made best effort to present at the most appropriate level the current licensing process in Greece. However, HWEA makes no warrantee and accepts no liability for the accuracy of the information included. This Guide cannot substitute a legal opinion on the procedures applied.

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# Licensing Procedure for Wind Farms in Greece

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# Licensing Procedure for Wind Farms in Greece

Law 3468/2006 (OG 129 A), as it stands today after several amendments (e.g. Laws 3851/2010, 3983/2011 etc.) constitutes the key framework for RES development in Greece, including wind energy power plants. Regarding environmental licensing of a wind project, Law 4014/2011 (OG 209A) determines the procedure should be followed, differentiated according to the nominal capacity of the project and its location within or not a protected area (National Park, Natura 2000 area etc.). The legal framework has been supplemented by several Ministerial Decrees.

## 1. Overview of the licenses and milestones

The main milestones and licenses for a wind energy project in Greece, issued sequentially, are:

- a) The **Production License**<sup>1</sup>, which in practice constitutes “a project feasibility approval”.
- b) The **Approval of Environmental Terms** or otherwise **Environmental Impact Assessment (EIA) Approval**<sup>2</sup>.
- c) The **binding Grid Connection Offer (GCO)**, which is issued after EIA Approval and secures access to the electrical grid. It specifies the point of the grid where the wind power plant will be connected, the required works for this purpose and their costs.
- d) The **Installation License**. The competent authority is bound to issue the Installation License, as far as a binding Grid Connection Offer has been obtained and various formal prerequisites -all being subject of proper preparation and of the discretion of the investor to execute them (payment of taxes, fees, land-use right etc.)- have been met. The Installation License grants the right to proceed with the construction of the project.
- e) The **Operation License** is the final License of a wind energy project and is issued after the construction and successful start up of the power plant.

It is noted that once a binding GCO has been obtained and before the issuance of the Installation License, a request towards signing the Grid Connection Contract (GCC) with the System Operator is submitted. After signing the GCC, the Power Purchase Agreement (PPA) is signed with the Electricity Market Operator (EMO, LAGIE in Greek) for injecting the produced electricity to the grid in a predefined feed-in tariff. It is noted that the enforcement of GCC and PPA takes place only after the issuance of Installation License.

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<sup>1</sup> Up to June 2010, the prerequisite for the issuance of the Production License was, among others, the preliminary environmental license (Preliminary Environmental Impact Assessment approval, PreEIA). The latter has been merged in 2010 with the Environmental Impact Assessment (EIA) approval according to Law 3851/2010

<sup>2</sup> Since 2011, EIA approval provides also the land-use right if the installation site is a public forestal area (permission for intervention). Furthermore, expropriation rights are obtained in case of private land as part of the EIA approval.

## 2. Analysis of basic steps of the licensing procedure

### 2.1 Production License

The application for Production License is submitted to the Regulatory Authority for Energy (RAE) and includes technical, energy and feasibility study of the project including a certification for the wind measurements performed by an accredited laboratory<sup>3</sup>.

The Production License is issued by RAE after thorough examination of the analytical criteria which cover all major aspects of the applied project, i.e. technical, environmental, economic and policy aspects.

Among others, it is confirmed the compatibility of the project with the basic provisions of Special Framework for Spatial Planning & Sustainable Development for RES and especially that the project is not planned to be installed in any a-priori exclusion zone (e.g. a strict nature reserve, priority habitat etc.) nor exceeds the “carrying capacity” of the broader area, i.e. the maximum number of wind turbines permitted to be installed in this area.

Until June 2010, the financial capability of the investing scheme was being examined (proof of funds criterion) as well. After the issuance of Law 3851/2010 and the decision of the Regulatory 1179B/25.6.2010 the specific criterion has been easier to be met since a - non binding - Letter of Intent from a bank is adequate.

The Production License substantiates that the project is compatible with the entire institutional framework for RES, it constitutes a major milestone for the successful completion of the licensing procedure and it provides comfort for the final acquisition of the Installation License, given that the investor will proceed to all necessary actions and studies required by the legislation.

Reasonably, there might exist possible unknown hidden obstacles which objectively are not able to be identified at this stage and might lead even to the rejection of a project (e.g. archaeological findings inside installation area, possible interference to military radar systems etc.). Therefore, according to experienced developers’ best practice, in parallel or even prior to the Production License procedure, investigations and the issuance of preliminary positive approvals by all competent authorities (forestral, archaeological, military etc.) which according to law will opine during the Environmental Approval Procedure, is strongly suggested.

The validity period of the Production License is 25 years with an option of a renewal of the same length.

Finally, it is important to mention that according to an amendment in Law 3468/2006 introduced by Law 3983/2011, the investor is obliged to proceed promptly to all necessary actions for the soonest possible issuance of the Installation License and implementation of the project, without undue delay<sup>4</sup>. In the event of non-compliance with this obligation, RAE, towards which investors are reporting on a 6-month basis for the progress of the project, revokes the Production License. This

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<sup>3</sup> Reasonably, the wind measurements campaign is a continuous task, needed in all stages of a wind project development since the more measures exist the more accurate knowledge of the wind potential regime is collected, which is crucial for the final wind farm’s layout, the optimum selection of the wind turbine type, the assessment of the energy productivity and securing of the financing of a project.

<sup>4</sup> In addition to the obligation of performing without delay all actions, non-operating wind projects which have been awarded a Production License, should pay from 1.1.2015 onwards an annual fee of 1.000€/MW, regarding projects having completed 6 years after the issuance of the Production License (or 8 years for large wind projects with capacity greater than 150MW). If the annual fee is not paid, the Production License is cancelled automatically.

provision applies also to Production Licenses issued before the enforcement of Law 3983/2011 (17.6.2011).

## 2.2 Environmental licensing – Environmental Impact Assessment (EIA) approval

### 2.2.1 General

Regarding the environmental approval of a wind energy project, an Environmental Impact Assessment Study and a complete folder of supporting documents and studies must be submitted to the responsible authority for the environmental licensing of the project. Afterwards, the authority forwards the EIA Study to the rest competent authorities (forestral authorities, archaeological authorities etc.), in order to collect their opinions, comments and proposed environmental terms for the project implementation. Taking into account these opinions, the responsible authority assesses the impact of the project on the environment, and it finally decides whether an EIA Approval is to be issued or not, while in the first case it proposes measures to mitigate such impact.

The EIA Approval is valid for ten (10) years and can be renewed, one or more times for the same period.

### 2.2.2 Environmental classification of wind projects

All wind projects are categorized according to their nominal capacity and their location or not inside a protected area. According to Ministerial Decision no. 1958/2012, the environmental categories for wind energy projects are set out as follows:

- *Environmental Category A*: It includes two sub-categories as follows:
  - *Sub-category A1* includes projects:
    - with installed capacity greater than 60MW, or
    - with installed capacity greater than 30MW and either located in protected areas (Natura 2000 Network etc.) or including the construction of a High Voltage Line of a length longer than 20 km

For sub-category A1, the responsible licensing authority for the evaluation of EIA study is the Special Environment Authority (“EYPE” in Greek) of Ministry of Environment, Energy and Climate Change and the EIA Study is approved via a Ministerial Decision.

- *Sub-category A2* includes projects:
  - with installed capacity between 5MW - 60MW or
  - with installed capacity between 5MW - 30MW and located in protected area at the same time

For sub-category A2, the responsible licensing authority for the evaluation of EIA study is the Regional Directorate of Environment of the Decentralized Administration of the area where the project is planned to be installed and the EIA is approved via a Decision of the General Secretary of the Decentralized Administration.

Depending on the subcategory a project belongs to, there exist small differentiations in the environmental licensing procedure.

- *Environmental Category B*: It includes the wind farms with installed capacity less than 5MW.

## 2.2.3 The evaluation of Environmental Impact Assessment Study

### 2.2.3.1 The content of EIA study

A wind energy project comprises the main equipment (wind turbines) and the necessary infrastructure works (access roads, substations, overhead or underground high voltage lines etc). The EIA Study should examine every aspect of a wind project and every possible impact on environment.

Therefore, the EIA study includes at least an analytical description of the basic project design, i.e.:

- the number and type of the wind turbines and their micro-siting on ground,
- the ground areas where an intervention will occur for the foundation of the wind turbines and the platforms needed for their erection,
- the routing of the new roads (internal and external) as well as the interventions which may be needed for improvements on existing roads,
- the routing of the new electrical lines for the project connection (overhead and underground)
- the siting of the electrical transformation substation(s) if needed for the connection to the electrical grid.

EIA Study is further supported by various technical and/or ecological special studies, depending on the particularities of each project and possible additional requirements as dictated by the competent authorities.

### 2.2.3.2 Necessary Special Studies

The special studies, required for support and substantiate the EIA Study, are:

- Technical special studies, e.g.
  - Road studies for both access and internal road, including analytical topographic maps, road specifications (longitudinal & latitudinal slopes, turning radius etc.), estimation of the total excavations needed, disposal of excess excavation materials etc.
  - Access Road survey, which is performed by the transportation company in cooperation with wind turbine supplier, in order to determine the interventions needed on existing roads, which must be incorporated in EIA Study.
  - Ground conductivity measurements in order to determine a technically suitable area for the installation of a new 20/150 kV substation (in cases of projects involving such a construction).
  - Electrical connection studies including the final detailed study for the needed electrical lines (including the number and type of the pylons, their exact micro-siting on ground, calculations of the mechanical loads on each pylon etc.),
- Ecological special studies, e.g.
  - Visual impact studies, providing photorealistic renderings of a wind project as it is anticipated to be viewed from specific points of interest (monuments, traditional villages, touristic areas etc.), in order to evaluate the possible visual impact of a wind project.
  - Special Bird Study which according to the Special Framework for Spatial Planning & Sustainable Development for RES is mandatory for projects located inside a Special Protection Area (SPA) for birds. It is mentioned that there are cases where the responsible

authority require the elaboration of a Special Bird Study even for projects outside an SPA area.

- Flora study, required in case of installation areas with rare flora species in order to avoid intervention in the specific spots with such species
- Photo-interpretation survey of morphological and vegetation characteristics of the site, may be required for land characterization according to Law 998/1979
- Special Ecological Evaluation Study. If the wind farm's area belongs to a protected area of Natura 2000 Network, the EIA must include a Special Ecological Evaluation study, as determined in Law 4014/2011.
- Restoration studies, regarding all the works and actions performed after the construction of the project for the restoration of affected areas (planting indigenous species, watering for the first 2-3 years etc.)
- Other ecological studies

In specific cases, some of the above supporting special studies can be submitted at a later stage, i.e. after the submission of the EIA study<sup>5</sup>.

In case the basic project design, as described above, is initially accepted by the authorities but the EIA study lacks the necessary technical special studies, the authorities will require them. The technical special studies do not affect the opinion of the authority for the initial acceptance of the basic project design ("go or not go"). It is obvious that the authority will not even ask for such technical special studies in cases where it does not at all accept the basic design (e.g. in case the proposed new road passes through an area with extremely high ecological value and thus its routing should totally change and follow a totally different direction).

By requiring such special technical studies, the authority scopes (i) to determine in detail the terms and conditions for the project construction (ii) to ensure that project's construction will conform to the predefined specifications for such kind of works and (iii) to be in position to verify the compliance of the works to the approved studies.

Thus, when a competent authority requests this kind of technical special studies, in case the latter conform to the specifications set by legislation, the EIA Approval will be definitely granted. Furthermore, taking into account that especially in cases of projects planned to be installed in public forestal areas the EIA Approval constitutes Intervention approval as well, the forestal authorities require the technical special studies before approving the EIA, in order to determine precisely the exact areas of intervention and calculate the required amount which should be paid for intervening in forestal lands, according to the provisions of Law 998/1979.

In any case, it is clear that the elaboration and submission of the special studies which are demanded by the authorities, is an absolute necessity for the approval of the EIA.

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<sup>5</sup> Furthermore, additional special studies are required for the implementation of the Project (e.g. geotechnical study, wind turbine foundation study etc.). However, these are not expected to be needed for the issuance of the EIA Approval or the Installation License, although they should have been elaborated at the moment of the issuance of Installation License in order to start the construction immediately after and have the project realized within the tough deadlines (the same applies for all the preparatory activities e.g. financial closing, promotion activities at the local society, negotiations with suppliers and contractors) as explained below .

### 2.2.3.3 Opinions from the competent authorities

The general procedure for EIA approval includes the submission of the EIA Study to the responsible authority (see par. 2.2.2), which forwards the Study to several other specialized competent authorities in order to collect their expertise opinions per subject. After the detailed examination of the project, the competent authorities might impose restrictions for the installation of the project, deriving from specialized legislation of the particular subject each authority is responsible, such as forest protection, local spatial planning, land use plans, national defense, archaeological monuments, etc.

The local societies have also the right to take knowledge of the EIA Study and express their opinion, whereas the elected Regional Council of each wider area follows a formal “public consultation” procedure and issues an opinion as well.

These opinions are not binding for the responsible authority, which holds the right of the final decision on approving the EIA or not. Reasonably, the responsible authority takes seriously into account opinions which are scientifically substantiated and might reject ones that are based on general or political criteria or are beyond the field of competence of the specific authority that issued them. Such being often the case with opinions issued by local administration bodies or services directly controlled by local society.

## 2.3 Grid Connection Offer (GCO)

### 2.3.1 The provisional GCO

A non-binding, provisional, Grid Connection Offer (GCO) is issued by the System Operator, immediately after the issuance of the Production License. The provisional GCO defines a preliminary solution for the connection of the wind project to the electrical grid, subject to the existence of adequate capacity in the local grid when an EIA Approval will be issued.

### 2.3.2 The binding GCO

The binding GCO, which legally secures the grid connection (the access to the grid), is issued by System Operator after EIA Approval, provided that, at the time of submission of the EIA approval to the System Operator, there exist adequate capacity in the local electrical grid and the connection solution defined by the provisional GCO can be implemented without any technical problem<sup>6</sup>. If this is not the case, then the System Operator may issue, if technically possible, a binding GCO with a connection solution that might differ from the one initially defined with the provisional GCO. If this is not possible, the System Operator does not proceed to the issuance of a binding GCO.

The validity period of the binding Grid Connection Offer (binding GCO) is three years. An exception applies in cases of areas with saturated electrical grid, where a limited number of binding GCOs<sup>7</sup> are issued with a shorter validity period of 2 years. Further, binding GCOs which have been issued before Law 4152/2013 have a validity period for 4 years after their issuance.

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<sup>6</sup> The electrical capacity is also called “electrical space” and it represents the amount of power generated by the power plants which can be absorbed by the grid. When a project secures the grid connection, it is told that “the project books electrical space”.

<sup>7</sup> See the following par. 2.3.4 for the definition of when a grid is considered saturated. According to article 6 of Law No. 4203/2013 System Operator continues to issue binding GCOs for wind projects planned to be connected in a saturated grid, as far as the additional capacity will not exceed 20% of the total capability of grid to absorb energy from RES power plants (measure of overbooking).

According to Law 4062/2012, the duration of the binding GCO is extended until the expiration date of the Installation License, if the latter has been issued before the expiration of the validity period of the binding GCO.

Within the validity period of the binding GCO, the Grid Connection Contract should be signed. If the binding GCO expires prior to the signing of this contract or prior to the issuance of the Installation License, then the Production License will be revoked by RAE, since such an event is a clear indication that the investor has not performed the required actions in order to secure the on-time project implementation something which constitutes breach of his relevant legal obligation imposed with Law 3983/2011.

In the improbable case where the Production License is not revoked immediately, a new application for binding GCO may be submitted. This application will be, obviously, placed in the last ranking of the priority list of applications for the same grid area and will be examined, if ever, only after all previously submitted applications for GCOs have been examined and satisfied. This, option is only theoretical and nobody can base that it will ever happen since the competition among wind projects for gaining grid access is extremely strong, all over Greece.

Once the binding Grid Connection Offer is issued, the licensing procedure has been virtually completed, since all the remaining tasks until the issuance of the Installation License are mostly typical ones and not actions or submissions needing any investigation and/or evaluation any longer.

### 2.3.3 The obligation for Bank Guarantee

From 1.1.2015 onwards, in order to obtain a new binding GCO or to maintain an already obtained binding GCO, the investor is obliged to submit to the System Operator a Bank Guarantee. Its level is defined based on the project's installed capacity as follows:

- For the part of installed capacity up to 1 MW: 42.000€/MW
- For the part of installed capacity between 1-10 MW: 21.000€/MW
- For the part of installed capacity between 10-100 MW: 14.000€/MW
- For the part of installed capacity above 100MW: 7.000€/MW

In case a project has already obtained a binding GCO before 1.1.2015, the amount of the Bank Guarantee in order to maintain this GCO is reduced to the half of the initial amount above.

With the signing and put into effect of the Grid Connection Contract, the required Bank Guarantee is reduced to ¼ of the amount calculated.

The Bank Guarantee is not required in case a Grid Connection Contract has been signed and put in effect before 1.1.2015.

Prerequisites for the enforcement of the Grid Connection Contract are: (i) the issuance of Installation License (Law 3468/2006 as it stands today) and (ii) the payment of the cost<sup>8</sup> of works for connection to the grid constructed by System Operator according to the Grid Connection Contract (Law 4152/2013)

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<sup>8</sup> If this cost exceeds 250.000,00 €, the amount needed to bring into effect the Grid Connection Contract is capped by this figure (250 k€) while the rest cost is paid according to the payments timeschedule foreseen in the Grid Connection Contract.

Non submission of the Bank Guarantee by an investor for a project with binding GCO is considered as a clear violation of the legal obligation to proceed without delay to all necessary actions needed for the issuance of the Installation License. As told, in such case RAE revokes the Production License.

#### 2.3.4 Risks in obtaining access to the electrical grid

A wind energy project having obtained a Production License and provisional GCO, may not achieve to obtain a binding GCO, if the local electrical grid is considered saturated in the meantime and before the EIA Approval issuance.

An electrical grid is considered as saturated, if its electrical capacity is not enough in order to absorb at any time, in a technically safe way, the nominal electrical power generated by the power plants which have obtain binding GCOs.

The risk of not obtaining binding GCO and losing the privilege of grid access is increased in case of delays in completing the environmental licensing, since, other competitive companies may already have obtained binding GCOs in the meantime, reserving the electrical grid capacity.

## 2.4 Installation License

### 2.4.1 Overview

Installation License is the final license that practically provides the right to the investor to construct the project. Its purpose is to have an Administrative decree confirming that all licenses, approvals and required by law documentation have been submitted. Virtually, the procedure for Installation License issuance is the completion of a “check list” of already performed actions and licenses issued and it does not include any further evaluation of the project. The competent authority is bound to issue the Installation License, as long as the investor has submitted all the documents of the aforesaid “check list”.

The basic documents which are required for the issuance of the Installation License are the following:

- The binding Grid Connection Offer
- The EIA Approval
- The land-use right. EIA Approval provides the right of land use in case of public forestal land. In addition, EIA Approval provides expropriation right of private lands<sup>9</sup>. Reasonably, during licensing process until that moment, there is more than enough time for the investor to make all the necessary arrangements with potential land owners and be ready to submit to the licensing authority the relevant documentation, immediately after the issuance of the binding GCO without using the alternative of land expropriation.

More analytically:

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<sup>9</sup> Expropriation rights have been allotted to wind projects with Law 2941/2001, due to the recognized importance for the national economy and the public interest. It is noted that, due to the fact the land-use right can be secured without doubt if EIA Approval is obtained, the old existed criterion which was referring to the securing of the land-use and was examined by RAE in order to issue the Production License, has been abolished since August 2011 with Law 4001/2011.

After the issuance of the binding Grid Connection Offer, the investor submits to the competent authority (i.e. the Directorate of RES of the Ministry of Environment, Energy & Climate Change or the Department of Technical Control of the Decentralized Administration) an application for Installation License accompanied with a folder with copies of the licenses obtained so far (EIA Approval, binding GCO, land-use right etc.) plus proof of payments of some fees and deposits of negligence value (engineer's fee, taxes etc.) as provided by the Regulation for Installation Licenses.

Afterwards, the competent authority is bound to issue the Installation License within a time period of fifteen (15) working days.

#### 2.4.2 The analytical list of the documents needed for the Installation License

Article 8 of the Ministerial Decree D6/F1/13310/2007 determines the exact documents which should be submitted for the issuance of the Installation License. These are the following:

- a) Environmental Impact Assessment Approval
- b) Binding Grid Connection Offer
- c) A legal certificate proving the land-use right
- d) A solemn declaration of the project's owner regarding the award of the design of the project to a responsible against the law engineer, as well as a solemn declaration by the engineer stating the undertaking of the design responsibility of the project.
- e) The following supporting documents evidencing payment of fees, taxes and levy:
  - i) 1‰ of the budgeted cost of the investment in favor of the Engineers and Public Works Contractors Pension Fund and 0,5‰ in favor of the National Technical University of Athens according to the provisions of Law 2326/1940 (OG A 145) with an upper limit of the above amounts €2.93 and €1.47 respectively, according to the provisions of article single of Law 1889/1951 (OG A 211) and the rules applicable to the conversion of GRD into Euro and rounding thereof.
  - ii) 2% of the engineer's fee in favor of Engineers and Public Works Contractors Pension Fund and 1% in favor of National Technical University of Athens according to the provisions of article 11 of Law 915/1979 (OG A 103)
  - iii) Deposit of 10% of the engineer's fee to the competent Public Revenue Office as advance payment of the engineer's income tax according to article 52 of Law 2238/1994 (OG A 151). Especially in the case of hydraulic and topographical works this percentage is 4%
  - iv) Receipt for the deposit to National Bank of Greece of the engineer's fee
  - v) Stamp duty 2‰ of the engineer's fee deposited to the competent Public Revenue Office
  - vi) Deposit of €27,88 in favor of the State (account No. 1459) to the competent Public Revenue Office according to article 2 of Legislative Decree 1150/1949 (OG A 249), article single of Law 1889/1951, joint ministerial decision 13959/22.2.1952 and the valid rules of conversion of GRD into EUR and rounding thereof.

The documents provided in the cases ii), iii) and iv) of this clause e) are required only in case the responsible engineer is a free-lancer. If he is an employee of the special project company, then only the relevant certificate for its hiring should be provided.

### 2.4.3 Validity period and deadlines

The Installation License is valid for a two years period and according to Law 4203/2013 may be extended for an equal length of time as long as: (i) the capital expenditures before expiration date exceeds the 50% of the total investment cost, or (ii) the existence of a firm agreement for the supply of the main equipment (wind turbines) or (iii) any license required for the construction of the wind project has been suspended by a court decision.

An additional second extension for a maximum period of 18 months may be awarded as long as (i) upon expiration of the first two-year extension, the capital expenditures exceeds the 40% of the total investment, or (ii) any license required for the execution of the wind project has been suspended by a court decision.

In cases of large wind projects (>150MW) or wind projects involving submarine electrical cabling or generally complicated grid interconnections, the Law provides the option for a further extension of the Installation License, after submission of a detailed and substantiated timetable for its construction.

If the Installation License expires without the project constructed and in operation, then the project is totally cancelled, with no capability of submitting a new application.

## 2.5 Operating License

The Operation License is granted after the completion of both construction and commissioning period of the wind project. Its validity period is twenty (20) years and may be renewed for up to twenty (20) more years.