



Basic points for the discussion with EC
Athens, 15.1.2019

RES Special Account and Payment Delays

- There is a tendency for increasing of the payment delays, obviously due to the reduction of the suppliers' surcharge (SS). This tendency is counterbalanced by the current prices of SMP and CO₂ emissions allowances prices.
- There should not be monetary flows from the RES Special Account to the suppliers due to the accounting surplus of 2018 as long as the cashflow deficit has not been totally tackled (the payment delays remain high). Moreover, the calculation of the accounting surplus of the Account has not taken into account several obligations and risks of DAPEEP.
- There is no any mechanism in place, after the abandon of SS, as agreed. Our proposal has been the automatic re-activation of the SS (or a similar mechanism) in order for the suppliers to return again part of their benefit to the Account, if the payment delays continue (or even more if they increase).
- It is essential to issue as soon as possible the ministerial decision for the guarantees to be provided by the suppliers to DAPEEP (par. 10, ar. 4, L. 4585/2018). Otherwise, the positive clause for the direct flow of ETMEAR from the suppliers to DAPEEP (par. 1 and 5, ar. 4, L. 4585/2018) might be proved dangerous.

Licensing issues

- The costs and risks of project development remain extremely high. We have proposed to actively participate in a working group formed by the Government for the rationalization of the procedures.
- A typical example is the annual fee for the production licenses. Virtually, the developers are taxed due the in inefficiencies and the delays of the state procedures. Instead of abandoning this fee, article 8 of L. 4585/2018 foresees the payment of triple fee in 2019 (i.e. simultaneous payment of the fees for 2017, 2018 and 2019).

Growth strategy

- **National Energy and Climate Plan.** We have called for:
 - a roadmap for large scale RES investments within NECP, including large onshore wind on mainland and islands/islets, large storage and offshore wind



- an action plan for the monitoring of the NECP with intermediate targets, specific policy measures etc.

Moreover, we need more ambitious targets. The new wind MWs seem to have been underestimated and the scenario presented.

See <http://eletaen.gr/wp-content/uploads/2018/12/2018-12-03-note-for-necp.pdf>

- **Auctions.** We have called for a more specific time plan for the expected auctions and capacities. The driver of the auctioned capacity should be the targets.
- **Interconnections.** We need:
 - more ambitious plan for the interconnection of the islands
 - a vision and an action plan for the international interconnection including works within the Balkan area.
- **Special Spatial Framework for RES.** It should be in line with the NECP

See <http://eletaen.gr/vasikes-theseis-gia-tropopoiisi-tou-chorotaxikou-ton-ape-february-2018/>

Other issues

- Capacity payments

See <http://eletaen.gr/epistoli-eletaen-sto-ypen-gia-to-mdi/>