CLEAR-X

Consumers Leading the EU's Energy Ambition Response, Expansion

National Policy Recommendations for Solar (PV) Panels

With the transposition of the Fit for 55 package and other relevant legislation, national consumer organisations wish to provide guidance to their governments on what consumers need to encourage their transition to renewable energy. Below is a list of steps Member States should take during the transposition process to build on the EU Directives and ensure higher numbers of consumers feel encouraged to install PV panels.

Ease the permit-granting process & accelerate new grid connections

The Renewable Energy Directive (2023) ensures that the waiting period for permit granting for PV panels of up to 100kW should not exceed one month (Article 16c). However, in order to speed up the roll-out of PV panels among citizens, national governments are free to go one step further and abolish the permit granting process for small-scale PV installations at the national level. For PV panels, a permit granting process could be replaced by the consumer simply notifying the grid operator of a new connection.

In cases where abolishment of the permit granting process is not feasible, the rejection of a permit application should require the grid operator to clearly demonstrate a) insufficient grid capacity or b) tangible safety concerns.

When it comes to tackling a slowdown of new grid connections, priority should be given to connections for small-scale solar PV for households and energy community projects.

Regardless of whether or not permit granting is abolished, further **resources** should be provided to public authorities to **hire and properly train** public servants to adequately deal with the scale of the permitting process.

Remunerate consumers adequately for excess power generated

According to Article 21 of the Renewable Energy Directive, excess solar electricity generated by consumers should be remunerated at least at market value. However, in many Member States, households can only sell their excess kilowatt-hours to

their retail supplier, who often only pays a fraction of wholesale market prices.¹

Not only should this situation be rectified to allow consumers to be adequately remunerated for electricity they generate but do not consume, but Member States should also ensure that no disproportionate taxation or levies be imposed on self-consumed

electricity - this is a requirement under the existing Renewable Energy Directive that is not always respected at the national level.

Facilitate tenants' access to solar power

Under Articles 21 and 22 of the Renewable Energy Directive, collective selfconsumption should be facilitated by the Member States and grid operators.

When it comes to the new right to energy sharing under the revised Electricity Market Directive,

Consumentenbond: 9 Vragen Over Terugleven. Rekenen met Zonnestrom. 2023. Member States should ensure cost-reflective and appropriate network tariffs and clarify the rules and responsibilities of households, suppliers, aggregators and grid operators involved in energy sharing schemes. Lastly, tailored support should be provided to social housing companies to engage their tenants in solar self-consumption and energy sharing.

Whenever a municipality is co-owner of renewable capacities under an energy sharing scheme, a share of the produced electricity (such as 20%) should be allocated to vulnerable and/or energy poor households, who tend to be tenants rather than homeowners.

Introduce a solar mandate for new residential buildings

We expect the upcoming Energy Performance of Buildings Directive to allow for an increase in ambition at the Member State level when it comes to solar panels on buildings. A solar mandate for new residential buildings should be applied as of 2029.

Roofs of new buildings can easily be designed so that solar panels can be fitted with the right orientation and inclination to maximise their power production. The barriers to making new buildings solar ready are very low, and can have a significant impact on the roll-out of solar panels across the EU, with little to no impact on consumers, while a mandate with a clear implementation deadline would provide stability in the market and allow time to scale up in manufacturing and training.

Create access to Alternative Dispute Resolution for the installation of PV panels

Installing solar panels on your roof or at your home can be a costly investment, and with varying quality among installations, it is not risk-free. In order to give consumers peace of mind to make the decision to invest in renewables, access to Alternative Dispute Resolution should be made available for the installation of PV panels.

The review and transposition of the Consumer ADR Directive gives the EU and Member States the opportunity to fully protect consumers and ensure that in case of poor installations, they will have access to redress, by adding this sector to the list of sectors covered by that Directive. This protection should also be added to protect consumers in new energy sharing schemes.

