



GEODE COMMENTS ON EUROPEAN COMMISSION PUBLIC CONSULTATION ON PERMIT GRANTING PROCEDURES

Association profile (as requested)

- I answer this questionnaire on behalf of industry
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GEODE, the European association representing the interest of energy distribution companies welcomes the opportunity to provide comments on European Commission Public Consultation on permit granting procedures.

Q1.- *As explained above, a complex and non-transparent procedural framework as well as poor administrative practice are major reasons for delays. There are different options which could help to facilitate **administrative procedures**. These include, as outlined in the Communication "Energy infrastructure priorities for 2020 and beyond – A Blueprint for an integrated European energy network", the establishment of a national contact and coordination body ("one-stop shop") per cross-border project, the introduction of a time limit, and the provision of rewards and incentives to regions or Member States which facilitate the permit granting process.² Would you consider these measures as useful? If so, under which conditions? Are there any additional measures you would propose to facilitate the administrative procedures?*

GEODE welcomes the proposal for a new legislation to faster permitting granting procedures. **GEODE** agrees with Commission that a long, complex and non-transparent procedural framework as well as poor administrative practices are major reasons for delays in permitting. Therefore we support the proposed options to facilitate administrative procedures one-stop-shop per project, time limit, provision of rewards to regions which facilitate the permit granting process.

Nevertheless the Commission should extend the scope of these proposed measures to infrastructure projects at the distribution level in order to achieve a true internal European energy market. As currently foreseen in the consultation document it seems as their scope is restricted to cross-border projects, normally at transmission level.



Faster permitting procedures are needed at the distribution network level to avoid existing long and uncertain approvals processes, hindering the construction of new power lines, and the expansion or modification of the existing ones. Numerous examples within EU, are proof that permitting procedures for new distribution infrastructure can take five, six or even more years. DSOs face same obstacles and delays as transmission operators when building new infrastructure.

Q2.- *To increase the **transparency and predictability** of the permit granting process for all parties involved, guidelines targeted at ministries, local and regional authorities, project developers and affected citizens could be developed. Would you consider them useful? Which issues should they address?*

GEODE supports Commission proposal to increase the transparency and predictability of the permit granting process for all parties involved by developing guidelines preventing it does not create more administrative burden or delay the process.

Q3.- *The lack of public acceptance poses a major hindrance for the implementation of energy infrastructure projects, and the associated achievement of energy and climate policy objectives. What should be done, apart from efforts to increase general transparency, to improve **communication with citizens** at an early stage of the project and to ensure that the environmental, security of supply, social and economic costs and benefits of a project are correctly understood? Who should be responsible for / involved in this communication?*

GEODE agrees it is essential to obtain a broad social understanding of the benefits of investments in infrastructure. More transparency and clearer communication as proposed by the Commission will contribute to it. Citizens in general and affected population in particular should be aware of the need of building new energy infrastructure; They should be informed in a clear and understandable way of the benefits of constructing it and at the same time the risks and consequences of not doing in terms of security and quality of supply. National energy authorities as well as local ones should be responsible for such



educational / informative campaigns. Local DSOs could play an advisory role at the local level.

Q4.- *The lack of public acceptance poses a major hindrance for the implementation of energy infrastructure projects, and the associated achievement of energy and climate policy objectives. What should be done, apart from efforts to increase general transparency, to improve **communication with citizens** at an early stage of the project and to ensure that the environmental, security of supply, social and economic costs and benefits of a project are correctly understood? Who should be responsible for / involved in this communication?*

As regards compensation mechanisms for affected population **GEODE** considers that existing national legislations should be applied and an harmonisation of requirements at European level is not needed.

Q5.- *Have you encountered any national **best-practices** which have helped to facilitate the permit granting process? Which measures were taken in view of administrative procedures, transparency and communication with citizens, and how has the public responded?*

Far from identifying best-practices what **GEODE** has experienced is a common DSOs problem all around Europe to build new power lines or to expand existing ones due to existing permitting procedures that causes important delays of the projects.

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