



## **PUBLIC CONSULTATION: AN EU STRATEGY FOR SOLAR ENERGY - PUBLIC CONSULTATION QUESTIONNAIRE - ACCELERATING THE DEPLOYMENT OF SOLAR ENERGY PROJECTS – ADDITIONAL COMMENTS**

11/04/2022

*Question 6. What are the key barriers that delay or prevent new utility grid solar energy projects (photovoltaic -PV or concentrated solar power - CSP) from materialising? Please assess their importance, separately for each technology, with 5 being the highest level of importance.*

**In the European Union, the permitting process is far too complex and renewable energy projects are likely to face restrictive or unclear regulations, that are totally incompatible with the Fit for 55 ambitions, and even less with the RePowerEU goals that emphasize and accelerate these ambitions.**

Moreover, there are strong disparities between EU Member states. For instance, in the development of PV farms, timeline can go from one year in Germany to four years in France. Promoting and sharing best practices between Member States within EU could accelerate the installation of renewable energy sources and TotalEnergies welcomes and supports this initiative of the EU Commission to promote a PV Strategy.

A few measures are already effective in a few Member States and could be proposed to other Member States:

- Speeding up permitting processes with a one-stop-shop, acting as a unique authority having full power to examine all administrative constraints and regulations (permitting, environment, grid connection...) with the ambition of meeting the national targets of renewable energy; having a clear and mandatory schedule will also help developers to anticipate the construction process (planification with contractors, supply chain, price visibility...).
- Unify guidelines (for instance environmental rules that often differ from one region to another within the same country) and unify administrative procedures.
- Comprehensive national plans in terms of use of land (“go to areas”); identification of agrivoltaics as acceptable use of land for PV with clear guidelines and incentives for farmers where possible; national space planning tool for identification and listing of all lands available for large scale PV farms (decommissioned landfills, army, or industry installations); permitting and environmental clearing conducted by the government authorities and reimbursement by the developers when granted.
- Subsidies schemes must provide predictability and certainty to the developers.
- Maintaining a fair competition between developers to get access to the grid in a reasonable time limit not exceeding 12 months.

- Promoting the discussion with local communities sharing with them benefits in having renewable plants in their territory.
- Moreover, qualifying renewable energy projects, such as large-scale PV, as being in the public interest could allow a better social understanding and acceptance and would facilitate the access to land. It is indeed very important, from a legal perspective, that the goals of energy transition and fight against climate change be at least granted the same level of legal protection as other public policy requirements. Energy transition and the fight against climate change must be defined as being in the public interest and being fundamental legal principles or objectives, at the same level as other principles such as the protection of biodiversity for instance. This will allow courts to uphold important projects that favour the energy transition, balancing the benefits of these projects with the costs that they may have with regards to other public policy goals (e.g. protection of biodiversity). If the legal protection granted to the fight against climate change and the energy transition was lower than that offered to other public policy goals, this may undermine the objectives pursued by the EU under Fit for 55.

*Question 10. How would you assess the following factors in preventing energy communities from fully playing their role in the generation, sharing and sale of solar energy? (5 being the highest level of prevention)*

**Energy communities are one of the solutions to promote renewable energy projects, raise public awareness and strengthen social acceptance.** Energy communities are authorized only to a few categories of participants who must keep ownership of the production asset. Thus, in some territories where large scale PV installations could be developed, some projects cannot be developed when the energy community does not obtain its funding. The EU could promote a new scheme where the energy community does not have full ownership of the asset.

*Question 19.2. If no, how would you assess the following factors, deterring you from installing a battery for your domestic or business needs? (5 being the highest level of deterrence)*

**Storage is still facing negative effects which affect its development.**

- Common guidelines and harmonization on environmental impact should be promoted.
- Time limit should be set to grid requirements made by TSO and should not exceed 12 months.
- Lack of price signal in the current market design makes it difficult for developers to validate a viable economic scheme in the long run. on long term.
- Double-charging of taxes on energy storage (consumption/injection).

*22. Do you consider that the EU's reliance on imported products/materials in the solar energy sector creates vulnerabilities or risks for accelerating deployment of solar energy?*

80% of PV modules and 80% of inverters are coming from China ; and the very few European modules producers get their cells from China, that is to say that China has a strong monopoly on the PV cells supply. Therefore, EU developers are dependent on the Asian manufacturers capacity to follow renewable policies.

Strategies to cope with the vulnerabilities linked to the reliance on imported materials might be implemented.

*Question 23. Do you consider that supply chain challenges could have a substantial impact on the availability of cost-effective solar energy solutions in the EU market in the medium-long term? On a scale from 1 (certainly not) to 5 (certainly yes)*

**Prices are increasing throughout the entire supply chain.** The lack of diversity of manufacturing and the difficulties getting local content for PV modules or other materials have a negative impact on both prices and delivery times. Between June 2021 and March 2022, the increase of the overall equipment price is around 10% (25% for mounting system and other ancillary equipment's, 5% for PV modules and 5% for inverters).