

January 2023

**ENERGY COMMUNITIES
IN GREECE AND ITS LIGNITE AREAS #3**

REVIEW OF DEVELOPMENTS



Energy Communities in Greece and its lignite areas #3

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Summary

This analysis on energy communities in Greece and its lignite areas was based on the data available by the General Commercial Register (GEMI)¹ and the Hellenic Electricity Distribution Network Operator (HEDNO)² for November 2022, and follows-up on the respective reports by The Green Tank³. The main results of the analysis can be summarized as follows:

1. As of November 2022, there are 1,406 active energy communities in Greece, a 36% increase compared to November 2021. These energy communities have submitted 6,014 connection requests for both low and medium voltage and virtual net-metering projects, with a total

¹ GEMI, 2021, <https://bit.ly/3ozJsQN>

² HEDNO, File of Requests for the connection of RES and CHP plants under the competence of HEDNO (November 2022) <https://bit.ly/303PIMj>

³ The Green Tank, November 2021, Review of Developments. Energy communities in Greece's lignite areas, <https://bit.ly/3NXsVRF>
The Green Tank, May 2022, Energy communities in Greece and its lignite areas, Review #2, <https://bit.ly/3WclTwo>

capacity of 4,754.2 MW, which represents an 11.7% increase in requested capacity over the past year.

2. With regard to low and medium voltage, as recorded in November 2022, **energy community RES projects amount to 799.54 MW of installed capacity nationwide, accounting for 14% of the total installed capacity of RES projects** and representing a 71.4% increase compared to November 2021 (466.5 MW).
3. Nonetheless, **the installed capacity of virtual net-metering RES projects by energy communities, merely amounting to 3.17 MW**, is much lower than that of RES projects by energy communities in low and medium voltage. Thus, so far, energy communities mainly use this instrument in order to profit from the sale of electricity rather than to meet their own energy needs.
4. **During the energy crisis, citizens are turning to RES and self-production, either individually or collectively.** Connection requests by RES projects with net-metering increased from 4,476 in November 2021 to 11,503 in November 2022, while the respective capacity rising from 260.27 MW to 779.4 MW (+157% in number and +199.5% in capacity). In addition, virtual net-metering project requests by energy communities and other entities increased from 499 in November 2021 to 811 in November 2022, while the respective capacity rising from 90.78 MW to 218.18 MW (+62.5% in number and +140.3% in capacity).
5. **The percentage of all energy community RES projects that have been already electrified is low, highlighting the lack of sufficient electricity space on the grid** (802.71 MW out of 4,754.2 MW of total capacity requested). In particular, just 3.6% of virtual net-metering projects by energy communities have been electrified (3.17 MW out of a total of 86.99 MW); this percentage is much lower than that of low and medium voltage energy community projects (17.1% or 799.5 MW out of a total of 4,667.2 MW).
6. **The lack of grid availability for energy community virtual net-metering projects became even more pronounced over the period November 2021 - November 2022.** In particular, the number of requests for virtual net-metering projects by energy communities which were rejected by HEDNO due to inability to connect increased from four (4) in November 2021 to 72 in November 2022, or 49% of all such requests submitted in 2022. Similarly, rejected requests for projects in the low-medium voltage increased from 2,137 out of a total of 5,370 requests (39.7%) in November 2021 to 2,735 out of a total of 5,867 requests (46.6%) in November 2022. Given that the installed capacity of virtual net-metering projects (3.17 MW) lags significantly behind that of low-medium voltage projects (799.64 MW), it is critical that the former be, from now on, given priority with regard to electrification.
7. **Especially with regard to the lignite region of Western Macedonia, over the period November 2021 - November 2022, there is a marked interest in energy community projects, as compared to the national average.** In November 2022, the Region of Western

Macedonia ranks second and fifth nationwide with regard to, respectively, the number of active energy communities (261) and the installed capacity of relevant projects (63 MW in low - medium voltage and virtual net-metering). Moreover, over the period November 2021 - November 2022, a 14% increase is recorded in requests for RES projects by energy communities (the corresponding nationwide rate is 9%), highlighting citizens' growing interest in participating in the energy market. However, energy communities' interest in meeting own energy needs through the virtual net-metering tool proves to be even greater: within one year, the number of relevant requests recorded in this Region increases from 9 in November 2021 to 31 in November 2022 (+244%), namely, at a much higher rate compared to the national average.

8. **Compared to the lignite regional units of Western Macedonia, energy communities' momentum in the Regional Unit of Arcadia is clearly weaker over the same period.** In total, by November 2022, 21 energy communities had been established in Arcadia, and merely two (2) of them in Megalopolis. The electrified capacity of energy community projects in low and medium voltage in Arcadia tripled (5.29 MW from 9 projects) in one year (November 2021- November 2022). However, none of the aforementioned projects is located in the lignite area of Megalopolis. Furthermore, with regard to virtual net-metering projects by energy communities, no requests have been recorded until November 2022.
9. During the last six months, **only one public-benefit energy community (Energy Community of the Region of Western Macedonia and Local Land Reclamation Organizations- TOEB) was funded** with €3 million from the 2019 CO2 auction revenues channeled through the Green Fund.
10. Finally, **no change has taken place in the institutional framework regarding energy communities.** Nonetheless, in the next period, two relevant European Directives (Directive 2018/2001 on RES and Directive 2019/944 on the internal electricity market) are expected to be integrated into national law.

Introduction

This analysis on energy communities in Greece and its lignite areas was based on the data available by the General Commercial Register (GEMI)⁴ and the Hellenic Electricity Distribution Network Operator (HEDNO)⁵ for November 2022, and follows-up on the respective reports by The Green Tank⁶.

Energy community projects fall into two categories: (a) virtual net-metering projects, which aim to meet the energy needs of energy community members, and (b) Renewable Energy Sources (RES) projects in the low and medium voltage participating in the RES market. Moreover, non-profit energy communities formed by citizens, as well as energy communities established by local authorities (whether for-profit or not-for-profit, an option provided by Law 4513/2018, namely, the founding legislation for energy communities) are primarily aimed at public benefit and usually employ virtual net-metering to meet their own energy needs. On the contrary, for-profit energy communities, which usually operate in low and medium voltage, offer their members the economic benefits derived from trading the electricity produced on the market.

This report initially presents key aggregated data on the number and capacity of both categories of energy community projects (low-medium voltage and virtual net-metering), both at national and regional level. Next, a separate analysis is provided for low-medium voltage projects, which are mainly for-profit, and for virtual net-metering projects, which are mainly non-profit and aimed at meeting own energy needs. Particular emphasis is placed on the respective data with regard to the lignite areas. Furthermore, we examine the development of individual and collective self-production through energy communities⁷ over the past year in the midst of the energy crisis. In addition, recent developments regarding energy community funding sources are recorded, while the relevant questions submitted in parliament are summarized, along with their corresponding answers. Finally, the report outlines recommendations aimed at strengthening the institution of energy communities in the context of the Just Transition.

⁴ GEMI, 2021, <https://bit.ly/3ozJsQN>

⁵ HEDNO, File of Requests for the connection of RES and CHP plants under the competence of HEDNO (November 2022) <https://bit.ly/303PJMj>

⁶ The Green Tank, November 2021, Review of Developments. Energy communities in Greece's lignite areas, <https://bit.ly/3NXsVRF>

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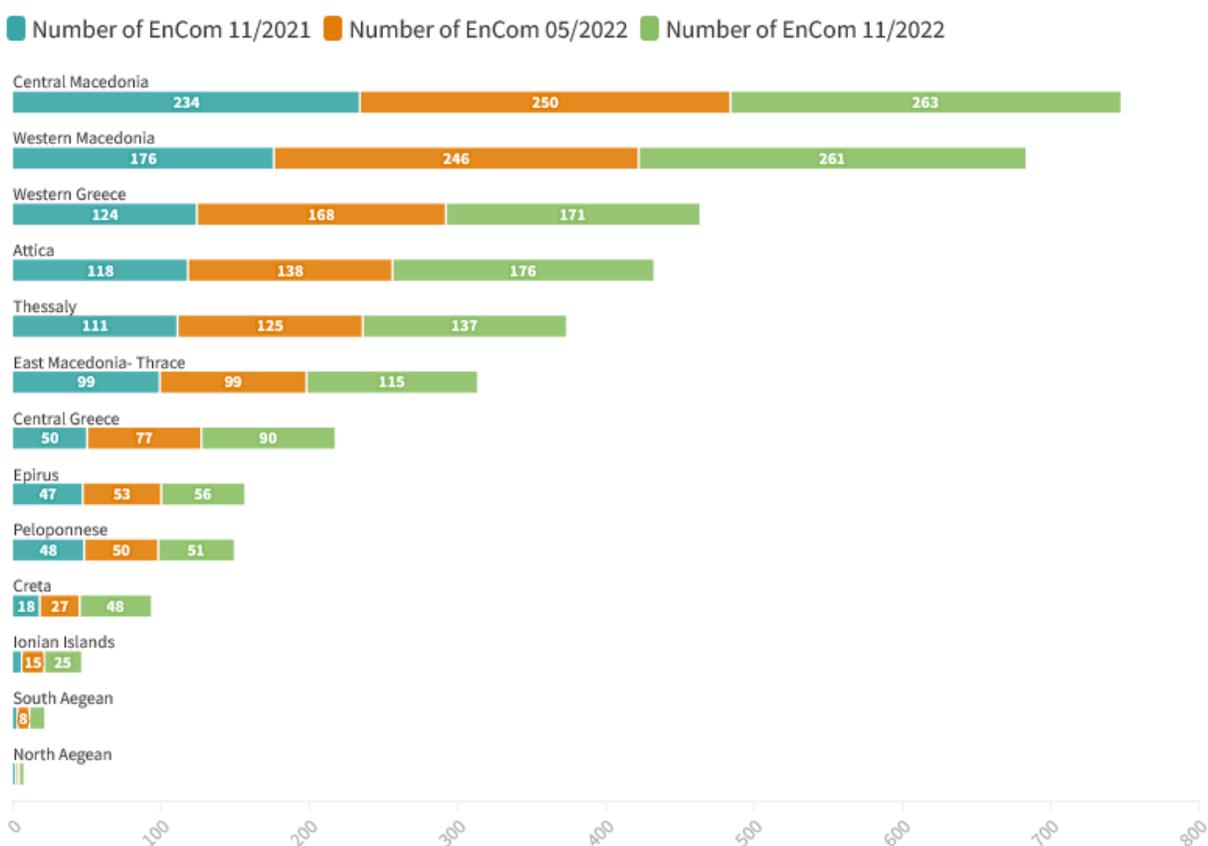
⁷ Both net-metering and virtual net-metering constitute tools used for electricity self-production. Under current legislation, virtual net-metering may only be employed by certain categories of citizens and legal entities, such as farmers, public/private legal entities pursuing general or local public benefit or other public interest objectives (school complexes, educational institutions, etc.) and energy communities. All others, such as individual citizens and businesses, may employ net-metering. Electricity self-production through energy communities entails producing and consuming energy collectively, thus, in this report, we refer to it as collective self-production of electricity.

Energy Communities in Numbers

Nationwide

As of November 2022, based on data from the General Commercial Registry (GEMI), there are 1,406 active energy communities nationwide, including 61 pre-registered communities⁸, while 138 energy communities have been unregistered and liquidated.

These data point to a 36% increase compared to the 1,036 active energy communities recorded in November 2021, and a 12% increase compared to the 1,258 active energy communities recorded in May 2022. The evolution of the number of active energy communities over the past six months (May - November 2022) and their distribution across the country's 13 Regions is presented in **Figure 1**.



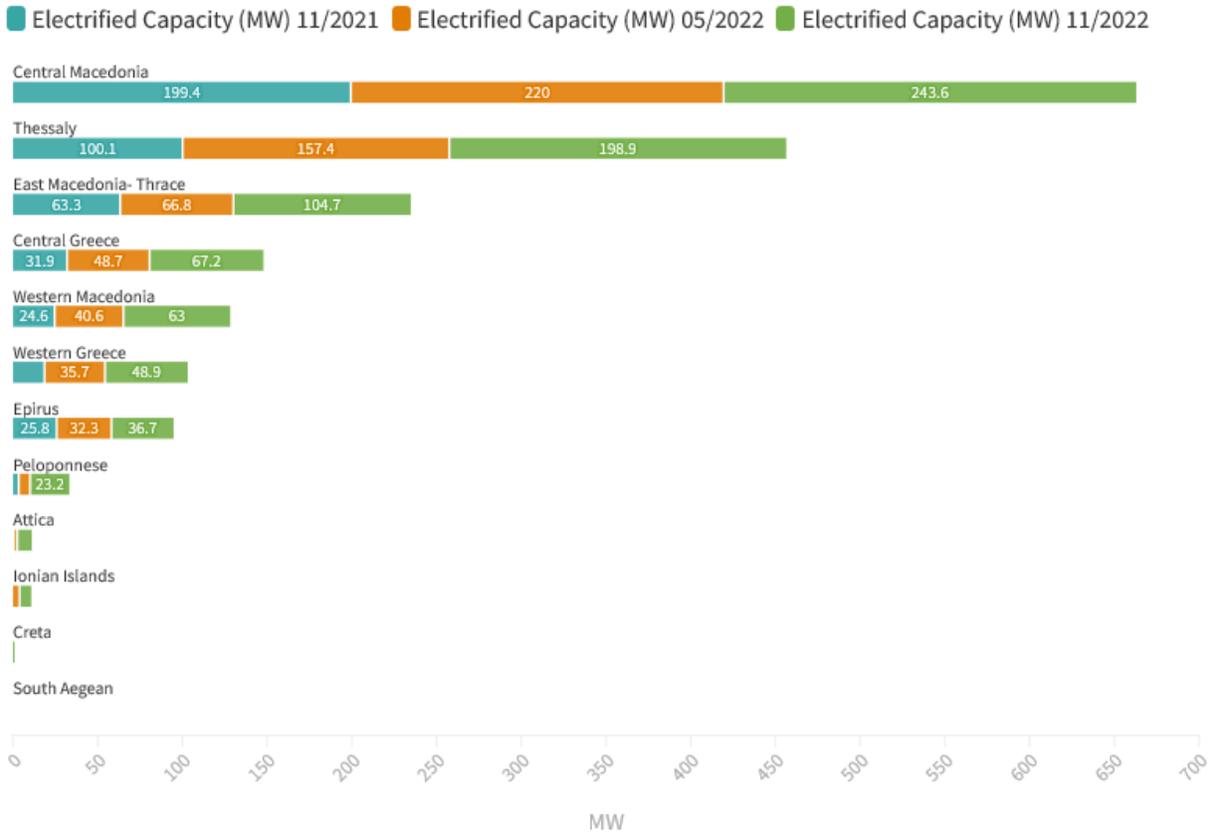
Source: General Commercial Registry (GEMI)

Figure 1: Distribution of active energy communities by Region (November 2021 - November 2022)

⁸ 'Active' energy communities are considered those registered in the General and Commercial Register (GEMI) as active and pre-registered. The process of starting a business begins with pre-registration at the competent chamber of commerce, where the distinctive title of the business is registered. The pre-registration certificate is valid for 2 months and the business must complete the start-up procedure (activity registration at the tax office, seat designation, TIN etc.) within this time period.

The ranking of Greece's Regions in terms of the number of energy communities established within their boundaries remains the same from November 2021 to November 2022. In particular, as of November 2022, the majority of active energy communities are located in Central Macedonia (263). In a very close second place is Western Macedonia (261), followed by Western Greece (171), Attica (176) and Thessaly (137). Despite the increase observed over the last six months (May - November 2022), the islands still make very little use of the institution of energy communities. The highest growth is observed in Attica, where 38 new energy communities were established between May and November 2022, followed by Crete (21), Eastern Macedonia - Thrace (16) and Western Macedonia (15). However, over a period of one year (November 2021 - November 2022), the highest growth is noted in Western Macedonia with the establishment of 85 new energy communities, followed by Attica (58), Western Greece (47) and Central Greece (40).

In terms of energy community project requests regarding both low and medium voltage and virtual net-metering, the data by HEDNO show that, in November 2022, there were a total of 6,014 project requests nationwide in both categories, with a total capacity of 4,754.2 MW; the latter represents an 11.7% increase in requested capacity over the past year. However, only 802.7 MW of the total requested capacity had already been electrified. **Figure 2** shows the distribution of this installed capacity across the country's 13 Regions.



Source: HEDNO (low - medium voltage and virtual net metering)

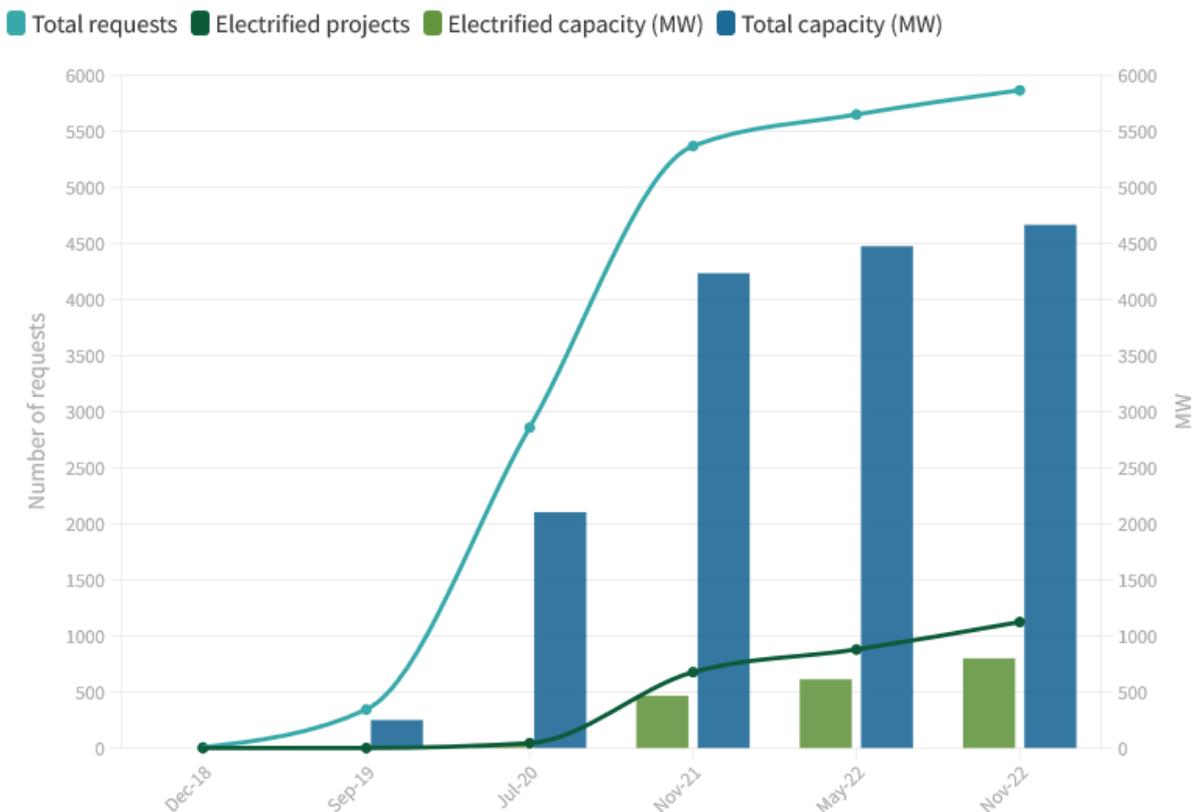
Figure 2: Distribution of energy community projects' installed capacity by Region (November 2021- November 2022)

We note that Central Macedonia remains in first place in terms of energy community RES projects' installed capacity (243.6 MW). Next, however, ranks Thessaly (198.9 MW), the region that comes in fifth in terms of the number of energy communities. Thessaly is followed by Eastern Macedonia - Thrace (104.7 MW), Central Greece (67.2 MW) and Western Macedonia (63 MW), which ranked, respectively, sixth, second and third in terms of the number of energy communities in November 2022.

Over the period May - November 2022, the largest increase in energy community projects' installed capacity was observed in the Region of Thessaly (41.5 MW), followed by the Regions of Eastern Macedonia - Thrace (37.8 MW) and Central Macedonia (23.7MW). Similarly, over a period of one year (November 2021 - November 2022), the largest increase in installed capacity was observed in the Region of Thessaly (98.7 MW), followed by the Regions of Central Macedonia (44.2 MW) and Eastern Macedonia - Thrace (41.3 MW).

Energy Community Projects in Low - Medium Voltage

Energy community projects in low-medium voltage follow the general upward trend of RES projects overall across Greece. In particular, **Figure 3** illustrates the time evolution of the number and capacity of connection requests and electrified RES projects by energy communities from the year they were instituted (2018) up to November 2022.



Source: HEDNO (low - medium voltage)

Figure 3: Time evolution of the number and capacity of low and medium voltage RES projects by energy communities in Greece (2018-2022)

In November 2022, the total number of energy community RES project requests in low and medium voltage was 5,867; this represents a 9% increase over the past year (November 2021-November 2022), which is no match for the peak increase (731%) observed between September 2019 and June 2020.

The corresponding total capacity in November 2022 was 4,667.2MW, up 10.2% compared to November 2021 yet once more incomparable to the maximum growth rate in requested capacity (1,219%) recorded over the period July 2020-November 2021. Furthermore, this capacity represents 18.8% of the total capacity of RES projects' connection requests in low and medium voltage (24,807.7 MW). In May 2022, this percentage was 18.6%, indicating that RES projects by

energy communities and other RES projects in low and medium voltage consistently follow the same course.

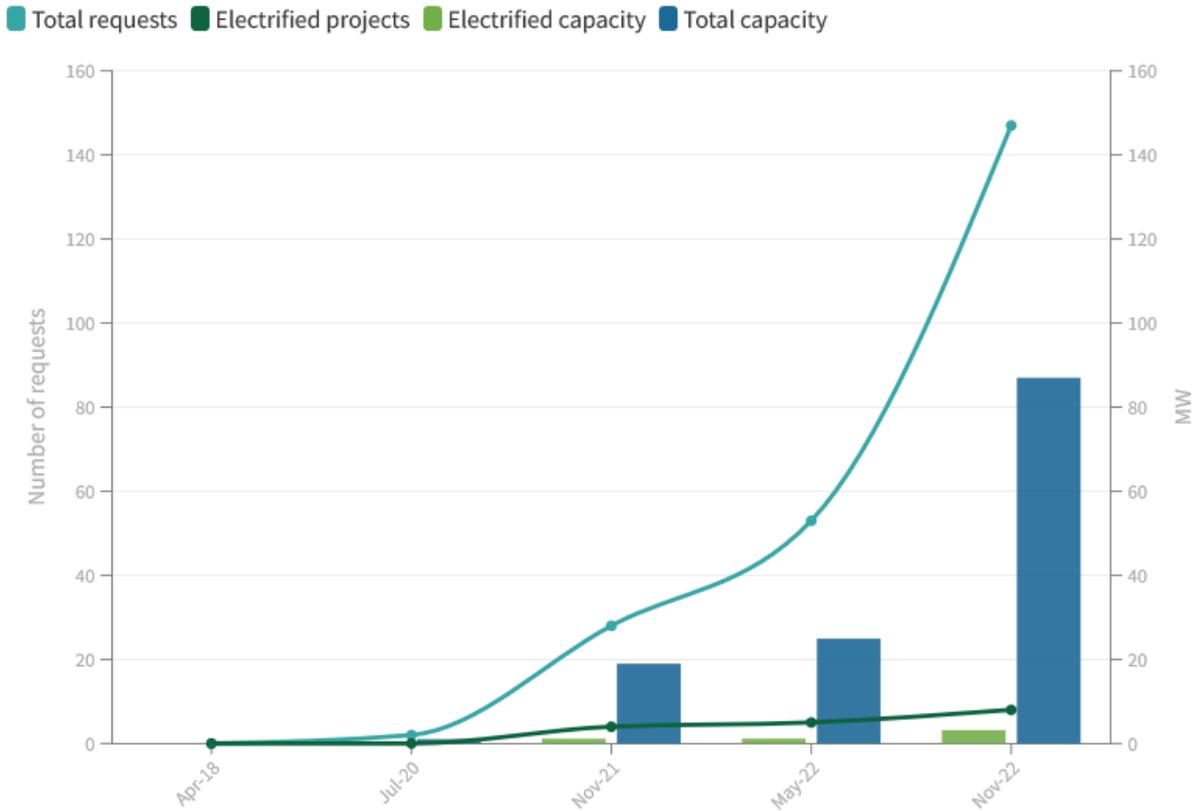
Out of the total capacity of energy communities' requests for RES projects, 17.1% or 799.54 MW is electrified, representing 14.2% of the total installed capacity of low and medium voltage RES projects in Greece (5,633 MW). The capacity of electrified RES projects by energy communities increases by 71.4% compared to November 2021 (466.5 MW) and by 30.5% compared to May 2022 (612.8 MW). It is worth noting that these energy community projects' growth rates are higher than those observed overall in low and medium voltage RES projects (28.7% compared to November 2021 and 10.4% compared to May 2022).

Looking at the course of energy communities' requests for projects in low-medium voltage, it is interesting to note that, in November 2021, out of a total of 5,370 requests nationwide, 2,137 (39.7%) were rejected by HEDNO due to inability to connect; moreover, 745 applications (13.8%) were cancelled⁹. Worse yet, in the past year up to November 2022, out of a total of 5,867 requests, 2,735 (46.6%) were rejected by the HEDNO due to inability to connect, while 1,367 requests (23.2%) were cancelled. As evidenced here, the number of energy community projects rejected by the Operator due to inability to connect is rising, highlighting the urgent need to address the issue of grid availability.

⁹ The data by HEDNO provide the date of the Operator's response to a project's request in order to reject it due to inability to connect, but there is no record of any further justification. In the case of cancelled requests, both the date of cancellation and the relevant justification are recorded. With regard to the latter, a request may be cancelled by either the producer or HEDNO, and due to non-payment of the connection contract or examination fee, or following the automatic expiry of the Final Connection Offer due to non-submission of a letter of guarantee, or it may be due to space/capacity segmentation.

Virtual Net-Metering

The evolution over time of the use of energy communities by citizens to cover their own electricity needs through the virtual net-metering tool is presented in **Figure 4**.



Source: HEDNO

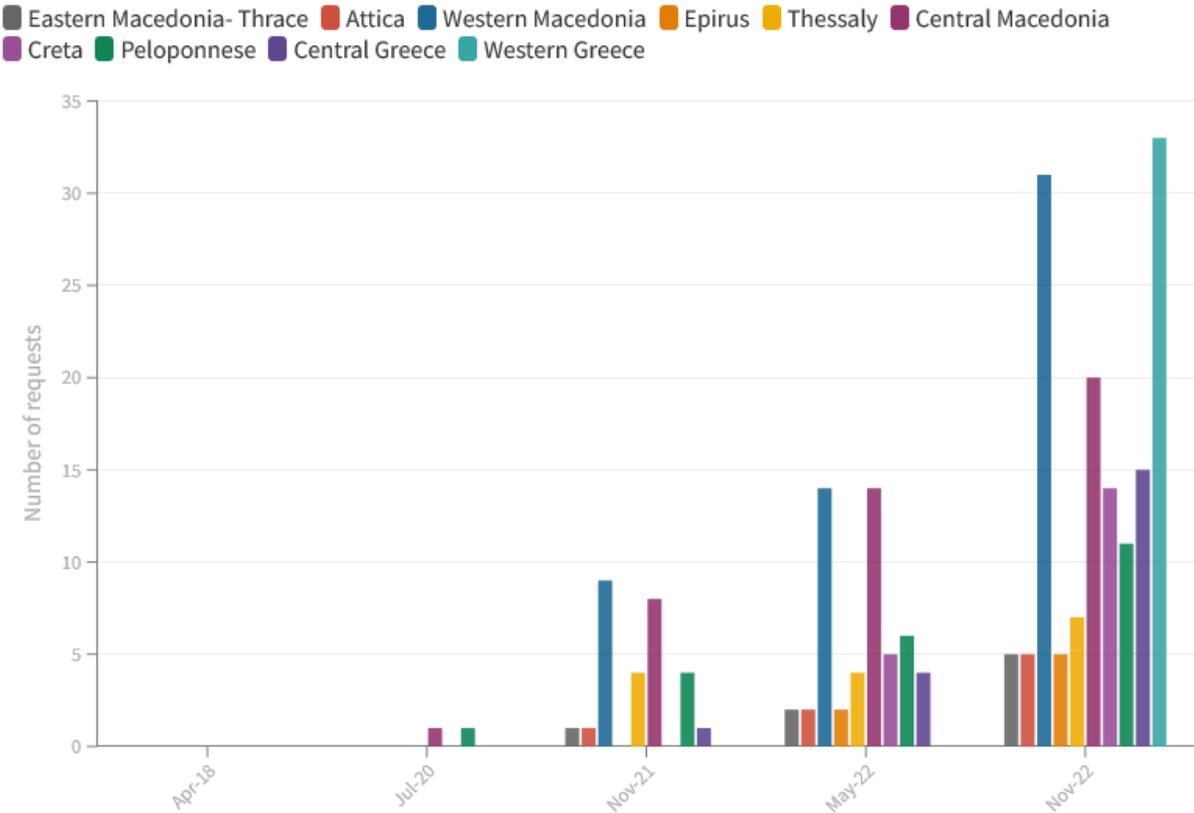
Figure 4: Temporal evolution of the number and capacity of virtual net-metering projects by energy communities in Greece (2018-2022)

The past year, and even more so the last six months, saw a surge of requests for virtual net-metering projects across the country, both by energy communities and by other entities (farmers, municipalities, public/private legal entities, etc.). Specifically, energy community virtual net-metering requests increased from 28 in November 2021 and 53 in May 2022 to 147 in November 2022 (+177% and +425%, respectively) and the requested capacity increased over the same period from 18.9 MW and 24.9 MW to 86.9 MW (+31.3% και +358%, respectively). This is a much larger increase than that observed in low and medium voltage over the past year (+9% in project requests and +10.2% in requested capacity).

Nevertheless, in November 2022, the total capacity of energy community requests for virtual net-metering projects was just 87 MW, namely, two orders of magnitude lower than that for projects in low and medium voltage (4,667.2 MW).

Furthermore, the percentage of energy community virtual net-metering projects that have been electrified remains very low. Only three (3) additional such projects with a total capacity of 2.02 MW were electrified during the last six months. Therefore, overall, as of November 2022, there exist eight (8) electrified virtual net-metering projects by energy communities, which amount to 3.17 MW. This capacity represents a mere 3.6% of the total capacity requested by energy community virtual net-metering projects, namely, a much lower percentage than the corresponding 17.1% recorded in the low and medium voltage (799.5 MW of installed capacity out of a total of 4,667.2 MW requested).

Figure 5 presents the distribution of requests for virtual net-metering RES projects by energy communities across the country’s 13 Regions over the period 2018-2022. In November 2022, the highest demand for such projects is observed in the Region of Western Greece (33 requests), which, up until then, had not received any requests for virtual net-metering projects by energy communities. Western Macedonia ranks second with 31 requests, followed by Central Macedonia with 20 requests. Compared to May 2022, the highest and lowest percentage increase in requests is noted, respectively, in Central Greece (+275%) and Central Macedonia (+43%).



Source: HEDNO

Figure 5: EnCom requests for virtual net-metering projects by Region (2018-2022).

It is worth noting that, in November 2021, out of a total of 28 requests -nationwide- for virtual net-metering projects by energy communities, 4 (14.3%) were rejected by HEDNO due to inability to

connect and 9 (32%) were cancelled. As in the case of energy community projects in low and medium voltage, connection difficulties multiplied over the last year; thus, in November 2022, out of a total of 147 requests by energy communities for virtual net-metering projects, 72 (49%) were rejected by HEDNO due to inability to connect and 18 (12.2%) were cancelled. Particularly in Western Greece, which recorded the largest number of requests for 2022, the vast majority have already been rejected by HEDNO due to inability to connect. Specifically, 32 of the 33 requests submitted by energy communities have received a notification of inability to connect. Furthermore, in Western Macedonia, which ranks second in terms of project requests, 19 out of 31 applications have been rejected due to inability to connect and 2 have been cancelled.

The above data demonstrate the lack of necessary available electricity space for virtual net-metering projects by energy communities, underlining a key issue, which has been amplified significantly over the course of a single year. These projects are now facing a similar grid connection problem as energy community projects in low and medium voltage (46.6% rejection rate due to inability to connect in November 2022). Given that the installed capacity of virtual net-metering projects (3.17 MW) lags significantly behind the installed capacity of low-medium voltage projects (799.64 MW), it is crucial that, from now on, priority be given to energy communities' virtual net-metering projects.

Lignite Areas

Focusing now on the evolution of energy communities in the lignite areas and based on the data by GEMI, we note that, in November 2022, energy communities amount to 261 in Western Macedonia and 21 in Arcadia. Their distribution, as well as their evolution, is shown in **Table 1** below:

Table 1: Distribution of active energy communities in the lignite areas					
Region of Western Macedonia					
	Grevena	Florina	Kozani	Kastoria	<i>Total</i>
November 2021	2	63	103	8	176
May 2022	15	86	137	8	246
November 2022	15	87	151	8	261
Regional Unit of Arcadia					
	Megalopolis	Tripoli	Other areas		<i>Total</i>
November 2021	2	13	3		18
May 2022	2	14	3		19
November 2022	2	16	3		21

GEMI data analysis (November 2022)

The above data confirms the conclusion of our previous analyses regarding the significant differentiation in the development of energy communities and their characteristics in Western Macedonia and Arcadia.

Western Macedonia

In Western Macedonia, over a period of one year (November 2021 - November 2022), 85 new energy communities were established (+48%), 57 of which in the purely lignite areas; in particular, from May 2022 to November 2022, most new energy communities were established in Kozani. Thus, the majority of energy communities in Western Macedonia have been established in the purely lignite areas, namely in Florina and Kozani, and their development continues predominantly in these areas; this can be attributed to the energy tradition of these two regional units.

In November 2022, in Western Macedonia, the electrified capacity of energy community RES projects in low and medium voltage amounts to 63 MW from 100 projects out of a total of 782 requests (630.2 MW). This electrified capacity accounts for 20% of the total installed capacity of RES projects in this Region. Moreover, the 682 pending requests for the connection of energy community RES plants constitute 19% of all pending connection requests, while their capacity (565.2 MW) represents 32% of the total capacity of pending low and medium voltage RES projects in the Region of Western Macedonia.

It is worth noting that the electrified projects in low - medium voltage more than doubled (+133%) over a period of one year (November 2021 - November 2022), and so did the electrified capacity (+156%) during the same period. Furthermore, in this Region, the last one-year period (November 2021 - November 2022) saw a 14% increase in energy community requests for low-medium voltage RES projects (from 686 in November 2021 to 782 in November 2022), while the respective nationwide rate is 9% (from 5,370 in November 2021 to 5,867 in November 2022). The increase in requests for the connection of energy community projects also reflects citizens' great interest in participating in the energy market. Furthermore, in the past six months (May - November 2022), the number of electrified projects along with the installed capacity increased by 45% and 55%, respectively.

With regard to the coverage of own energy needs, HEDNO's data on Western Macedonia show that only 31 out of a total of 86 virtual net-metering projects (both electrified and non-electrified) belong to energy communities¹⁰; these have a total capacity of 18.78MW. However, out of these projects, only 1 project of 0.03MW has been electrified, while out of the remaining 30 requests, two (2) have been cancelled and 19 have been rejected by the Operator due to inability to connect.

Arcadia

Overall, by November 2022, the Regional Unit of Arcadia was home to 21 energy communities, merely two (2) of which had been established in Megalopolis. Specifically, during the period November 2021 - November 2022, only three (3) new energy communities were established in Arcadia; what is more, the latter were founded in other municipalities of this Regional Unit rather than in the lignite area of Megalopolis. Therefore, the momentum of energy communities here is clearly weaker compared to the lignite Regional Units of Western Macedonia over the same period.

¹⁰ The remaining requests concern citizens, agricultural cooperatives and other natural and legal persons other than energy communities.

In the course of one year (November 2021 - November 2022), energy community requests for connection of low-medium voltage projects in the Regional Unit of Arcadia increased by a mere 1.5% (66 in November 2021 and 67 in November 2022), namely, at a significantly lower rate compared to the country as a whole, where the corresponding rate is 9% (with 5,370 in November 2021 and 5,867 in November 2022). However, over the same period, the electrified capacity of energy community low-medium voltage projects in Arcadia tripled and, in November 2022, amounted to 5.29 MW, corresponding to nine (9) projects out of a total of 67 requests with a total capacity of 50.06 MW. These 5.29 MW of electrified capacity represent just 3.5% of the total installed capacity of RES projects in the Regional Unit of Arcadia. Again, these projects are located in Tripoli, rather than in the lignite area of Megalopolis, where there are still no completed RES projects by energy communities; the eight (8) pending connection requests recorded have all been cancelled by HEDNO.

Finally, up until November 2022, no requests have been recorded for virtual net-metering projects by energy communities.

The Energy Crisis and Electricity Self-Production

In addition to the aforementioned surge in requests for virtual net-metering projects by energy communities, the increase in the use of the virtual net-metering tool by other entities has also been impressive. Between November 2021 and November 2022, the total number of virtual net-metering project requests (not only by energy communities) rose from 499 to 811 (+62.5%), while the corresponding capacity increased from 90.78 MW to 218.18 MW (+140.3%).

Even higher was the upsurge in requests for self-production through the mechanism of net-metering, namely, self-production of electricity by individual citizens and businesses. Specifically, from November 2021 to May 2022, requests for such projects increased from 4,476 to 7,894 in number, with a capacity of 260.27 MW to 479.4 MW respectively; subsequently, there were 11,503 requests recorded in November 2022, with a capacity of 779.4 MW. This constitutes an 157% increase in the number of requests and an 199.5% augmentation in capacity over the last year, in the midst of an unprecedented energy crisis.

Therefore, the data on electricity self-production projects leads to the conclusion that the current energy crisis motivated citizens, businesses and local communities to use RES in order to meet their energy needs, either through self-production at the individual level (net-metering - virtual net-metering) or through collective self-production (virtual net-metering by energy communities). Hence, supporting such efforts has now become more urgent than ever, first and foremost by ensuring the necessary electrical space for this type of projects.

Energy Community Sources of Funding

The only development regarding energy community funding in lignite areas is the allocation of €3 million of the Green Fund's national resources to the energy community of the Local Land Reclamation Organizations (TOEB) of Western Macedonia and the Region of Western Macedonia. These funds came from part (6%) of the 2019 revenues of emission allowances auctions that were channelled to the lignite areas and amounted to €30,567,018.30 million¹¹.

The resources earmarked for energy communities by the 2021 - 2027 Just Development Transition Program¹² are expected to be activated in the coming period.

Energy Communities Discussed in Parliament

During the past six months (May - November 2022), the institution of energy communities and its development constituted once again an issue of concern to political parties; the latter continue to highlight its different aspects in Parliament, through parliamentary questions and reports.

In particular, the Coalition for the Radical Left (SYRIZA) has tabled a parliamentary question on the current policy on energy communities (institutional framework, funding, connection priority, implementation of RePowerEU provisions)¹³. This party also reported the resolution of the General Assembly of 'Minoas' Energy Community¹⁴ from Crete; through this resolution, the energy community calls for the Operator to immediately license its projects and highlights the obstacles it is facing regarding the implementation of its projects aimed at providing relief to the earthquake-ridden local community. None of the above has been answered yet.

PASOK - Movement for Change (KINAL), respectively, has submitted questions on the need for an extension in contracting outside competitive procedures for energy community projects with the Renewable Energy Sources Operator & Guarantees of Origin S.A. (DAPEEP)^{15, 16}; HEDNO's and the Greek Public Power Corporation's (PPC) delays with regard to project connections and offsetting in the electricity bills of energy community members¹⁷; and the urgent need for giving grid priority to energy community projects¹⁸. None of the above questions have been answered.

The European Realistic Disobedience Front (MERA-25) has also submitted a report on the aforementioned resolution of the General Assembly of 'Minoas' Energy Community¹⁹.

¹¹ GG B 5373/ 18.10.2022

¹² Just Development Transition Program 2021-2027, <https://bit.ly/3PLQE8G>

¹³ Greek Parliament (2022), Question by P. Perka, <https://bit.ly/3W0ta2Q>

¹⁴ Greek Parliament (2022), Report by S. Vardakis, <https://bit.ly/3UW10cT>

¹⁵ Greek Parliament (2022), Question by G. Arvanitidis, <https://bit.ly/3BDAdX1>

¹⁶ Greek Parliament (2022), Question by G. Arvanitidis, <https://bit.ly/3io3QFC>

¹⁷ Greek Parliament (2022), Question by V. Kegeroglou, <https://bit.ly/3HBqZ1w>

¹⁸ Greek Parliament (2022), Question by G. Arvanitidis, <https://bit.ly/3j51IXf>

¹⁹ Greek Parliament (2022), Report by G. Logiadis, <https://bit.ly/3j43LXf>

10 + 1 Recommendations

The Green Tank continuously intervenes in the public debate on the development of the institution of energy communities and their contribution to the Just Transition of the lignite regions by submitting concrete recommendations. In particular, the following are recommended:

1. A provision of subsidies for part of the cost of RES project installation should be instituted for public-benefit energy communities (involving either local authorities or citizens), whose main objective is to cover their own needs through net-metering.
2. The grid should be upgraded and sufficient electrical space should be reserved to connect energy community projects, and especially those involving energy storage.
3. Priority should be given to virtual net-metering projects by energy communities of local authorities and citizens whose objective is meeting own electricity needs; these projects should be guaranteed sufficient “electrical space”, as well as a suitable -in terms of size- land area for the installation of energy communities’ public-benefit projects in the Lignite phase-out Zones.
4. A minimum fixed allocation of annual resources from the auctioning of CO₂ emission allowances should be established, to be utilized according to the priorities of the Territorial Just Transition Plans (TJTTPs) and the corresponding Just Development Transition Program (PDAM), with a focus on energy communities.
5. A development fund (or an intermediary body) should be set up specifically for energy communities, in order to facilitate access to loans, provide guarantees, cover the costs of participating in competitive procedures, and subsidize the costs of projects’ preliminary phases.
6. There should be a distinction between energy communities and other beneficiaries of the development bill, by the standard of the PDAM 2021-2027, so as to enhance citizen participation in the just energy transition while combating energy poverty.
7. It is essential to enhance citizen participation in large-scale RES projects implemented in lignite areas by large companies such as the Greek Public Power Corporation (PPC); this could be achieved by instituting share ownership and reserving part of the shares to be purchased by energy communities.
8. The National Energy and Climate Plan (NECP) that is currently under review should set specific quantitative targets for energy communities.
9. The Directives on the promotion of the use of energy from renewable sources (Directive 2018/2001, REDII) and on common rules for the internal electricity market (Directive 2019/944, IEMD) should be promptly transposed into the Greek Law, so as to put an end to the uncertainty regarding the potential forms of energy communities and allow the latter to further develop in a stable institutional environment.
10. A special framework for conducting competitive procedures for RES projects should be introduced, involving only energy communities and, thus, ensuring a level playing field.
11. An information hub for energy communities should be launched by the Ministry of Environment and Energy, aimed to strengthen the institution through the collection and publication of data on energy communities and the formulation of recommendations (indicatively, regarding support schemes, business models, institutional changes, etc.), as well as to provide direct information on all relevant institutional developments and to address any issues that arise.