



# Energy Communities & Self-Production in Greece #6

November 2024



## Text

Ioanna Souka, Data Analyst, The Green Tank  
Ioanna Theodosiou, Policy Associate, The Green Tank

## Coordination:

Nikos Mantzaris, Senior Policy Analyst & Co-founder, The Green Tank

## Cite as

The Green Tank (2024) “Energy communities & self-production in Greece #6”

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## Layout Design

Design Nature

## Contact Details

📍 50, Vas. Sofias Avenue, Athens 115 28

☎ 210 7233384

🌐 <https://thegreentank.gr>

✉ [info@thegreentank.gr](mailto:info@thegreentank.gr)

# Summary

This report on energy communities and self-production is based on the latest available data by the General Commercial Register (GEMI) up to September 2024 and the Hellenic Electricity Distribution Network Operator (HEDNO) up to July 2024. It follows on from The Green Tank's five previous analyses, which were carried out each time the relevant databases were updated by HEDNO. The main findings are summarized as follows:

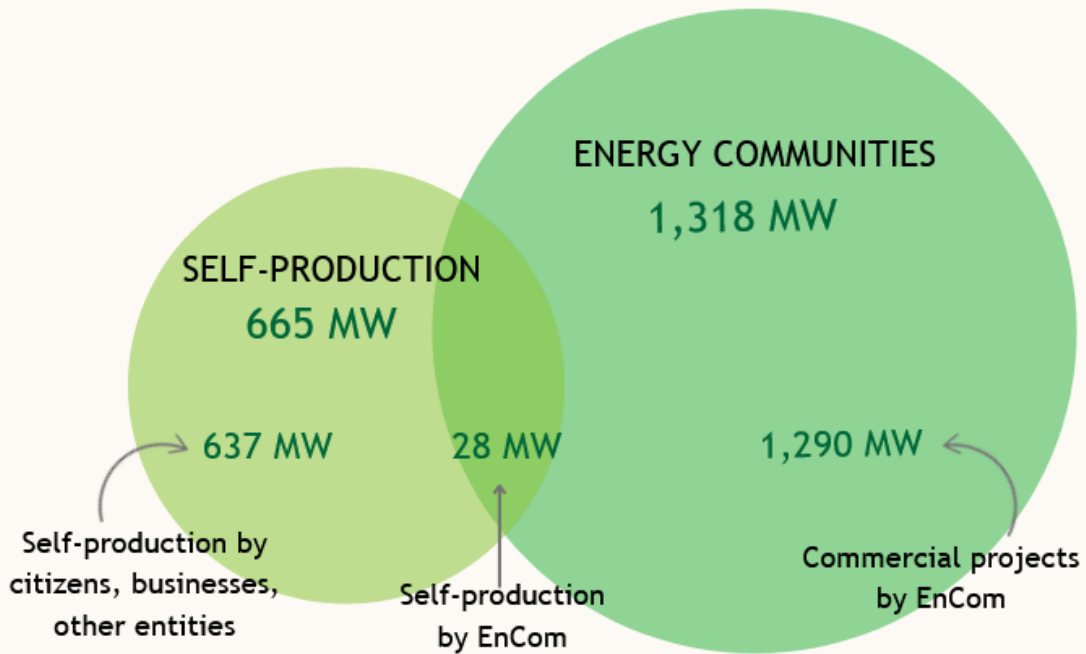
1. Up to date<sup>1</sup>, 1,742 energy communities have been established. The total requested capacity of projects (both commercial and self-production) amounts to 4,981 MW, of which 26.5% has been electrified (1,318 MW). The majority of electrified capacity (98% or 1,290 MW) corresponds to commercial projects, while merely 2% (28 MW) corresponds to self-production projects.
2. With regard to the number of energy communities, the lignite Region of Western Macedonia ranks second; nonetheless, this Region ranks fifth in terms of electrified capacity and has the highest percentage of energy community projects that have been unable to be connected to the grid (75%). The energy community of the Municipality of Kozani has received the first public funding for self-production projects with a total capacity of 7 MW from the resources of the Just Transition Development Program 2021 - 2027 (PDAM 2021 - 2027).
3. Stagnation is noted in project requests by energy communities nationwide. More specifically, in the first seven months of 2024, just 19 requests with a capacity of 1.7 MW were submitted, all of which related to self-production projects.
4. In contrast to requests, the electrification of energy community projects has proceeded, albeit at a relatively slower pace. In the first seven months of 2024, 182 projects with a capacity of 131 MW were electrified, down 33.8% compared to the same seven-month-period of 2023 (198 MW).
5. Regarding self-production in total, despite the uncertainty which ensued the announcement regarding the gradual abolishment of net-metering, a total of 10,934 requests (133 MW) were submitted by citizens, farmers, businesses, municipalities, energy communities and other entities in the first seven months of 2024, reduced by 34.4% compared to the same period in 2023.
6. In contrast to commercial projects by energy communities, self-production overall saw an acceleration in the rate of electrification; 212 MW of projects were electrified in the first seven months of 2024, namely, just 24 MW short of the amount electrified in all of 2023. A total of 665 MW of self-production have been electrified, accounting for approximately 8% of installed PV capacity nationwide.
7. The unavailability of electrical space, nonetheless, continues to hinder the electrification of self-production projects. By July 2024, 35% of the requested capacity (779 MW) had received a notification of inability to connect to the grid, while 9% was ultimately cancelled (194 MW).

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<sup>1</sup> For the number of energy communities GEMI data up to September 2024 were used, while for all other variables HEDNO data up to July 2024 were used.

8. The sum of the electrified capacity and the capacity of pending self-production projects amounts to 1,788 MW, verging on the 2 GW of grid space reserved for self-production projects provided by Law no. 5037/2023.
9. Significant changes have taken place in the institutional framework governing self-production, as the terms and conditions for the implementation of (virtual) net-billing were clarified through the issuance of a relevant Ministerial Decision. Only the beneficiaries of the “Photovoltaics on the Roof” program and farmers will be able to use the former scheme of (virtual) net-metering. Consequently, virtual net-billing constitutes the only institutional tool available to energy communities for energy netting.
10. The Apollon Program has been launched, aiming to reduce the energy costs of regional and local authorities, General and Local Land Improvement Organizations (GOEV - TOEV), and Municipal Water Supply and Sewerage Companies (DEYAs) through the establishment of a “Citizen Energy Community” (CEC) in each Region. An additional nationwide CEC is foreseen, in order to meet the needs of energy vulnerable households. Even though this program is on the right track, concerns have been raised as to whether there will remain sufficient electricity space after its implementation for other self-production projects by energy communities set up by citizens and SMEs.
11. An absorption margin of 10 MW per substation has been reserved for self-production projects. A capacity absorption margin of up to 3.8 MW has been foreseen specifically for CECs and RECs (together with other categories of self-producers). In addition, the available share for self-production per substation or per high-voltage/medium-voltage transformer was raised from 20% to 60% beyond the 10 MW capacity; accordingly, the share of commercial projects for RES producers was restricted to 40% (from 80%).
12. During parliamentary scrutiny, several questions were tabled on the following issues: the Apollon Program; the importance of energy communities for a Just Transition in lignite areas and the lack of available electrical grid for energy community projects; the development of projects by large companies at the expense of local authorities' and energy communities' projects; the manner in which energy communities can contribute to reducing the cost of agricultural production; and, regarding energy community projects, the poor implementation of virtual net-metering by electricity providers.

## ELECTRIFIED CAPACITY FROM SELF-PRODUCTION AND ENERGY COMMUNITIES



*Figure 1: Electrified capacity of energy communities and self-production for all categories of producers. Self-production projects account for just 2% (28 MW) of electrified energy community projects, while the total electrified capacity of self-production projects by citizens, businesses, farmers, energy communities and other entities amounts to 665 MW (July 2024).*

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# Introduction

The electricity production sector has seen major changes in the past five years. The accelerated penetration of Renewable Energy Sources (RES) and the shift away from lignite have contributed decisively to the decarbonization of the sector. Following the energy crisis and the large fluctuations in the prices of fossil fuels, especially fossil gas, energy communities and different forms of self-production have been gaining ground in the sustainable transformation of the country's energy model, promoting citizen participation in the energy transition. Despite grid availability hurdles, in 2023, the electrified capacity of energy community self-production projects more than tripled, while that of all self-production projects almost doubled in one year.

Self-production systems can be installed by individual citizens, farmers, businesses, and other entities. In the case of energy communities, projects are set up collectively by citizens, businesses, municipalities and other entities. At the same time, institutional regulations are significantly altering the implementation of self-production.

In Greece, until recently, two schemes of self-production were available: net-metering and virtual net-metering. In 2023, Law no. 5037 introduced for the first time net-billing and virtual net-billing, aiming to gradually eradicate the previous schemes. The main difference between them lies in the netting and management of the surplus energy produced by the renewable energy source (RES) system and not consumed by its owner or beneficiary. In net-metering, the energy produced is offset against the energy consumed throughout the day and year over a three-year period. In net-billing, netting occurs in real time as the energy is produced; surplus energy is injected into the grid and compensated at the wholesale electricity market price at the time of injection. Self-production projects by energy communities have been developed to date utilizing virtual net-metering.

In this review, self-production refers to all projects using net-metering or virtual net-metering (including projects by energy communities). The Hellenic Electricity Distribution Network Operator (HEDNO) has been accepting requests for projects using net-billing only since October 2024, so no data are yet available. This analysis regards all three forms of energy communities that currently exist, namely, those established under the founding law (Law no.4513/2018), as well as under Law no. 5037/2023 -Renewable Energy Communities (RECs) and Citizen Energy Communities (CECs)- and includes both types of energy community projects, namely, self-production and commercial (for-profit) projects.

This review analyses the trends observed in self-production and energy communities, focusing on their evolution in the first seven months of 2024, using the latest available data by the General Commercial Register (GEMI)<sup>2</sup> and the HEDNO<sup>3</sup>. The latest developments regarding resources, the institutional framework and parliamentary scrutiny are also presented.

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<sup>2</sup> GEMI, 2024, <https://bit.ly/3FdiqHK>.

<sup>3</sup> HEDNO, Archives of RES and CHP Requests under HEDNO's competence (August 2024), <https://shorturl.at/M9Qu2> & Archive of net- and virtual net-metering requests (August 2024), <https://shorturl.at/ulvaQ>.

# Energy Communities

## Nationwide

According to GEMI data, currently<sup>4</sup>, there are 1,742 energy communities nationwide. Of these, 1,685 are active Energy Communities under Law no. 4513/2018<sup>5</sup>, while 40 are Renewable Energy Communities (RECs) and 17 are Citizen Energy Communities (CECs), established as of March 2023, when the new legislation (Law 5037/2023) came into force. According to HEDNO data, since the institution of energy communities was established in Greece and up to July 2024, a total of 6,476 project requests have been submitted, with a cumulative capacity of 4,981 MW for both categories of energy community projects (commercial and self-production). A total of 1,824 projects have been electrified, with a capacity of 1,318 MW, which represents 26.5% of the total requested capacity by energy community projects.

As illustrated in Figure 2, project requests by energy communities have been stagnant in recent months. More specifically, in the first seven months of 2024, just 19 requests with a capacity of 1.7 MW were submitted.

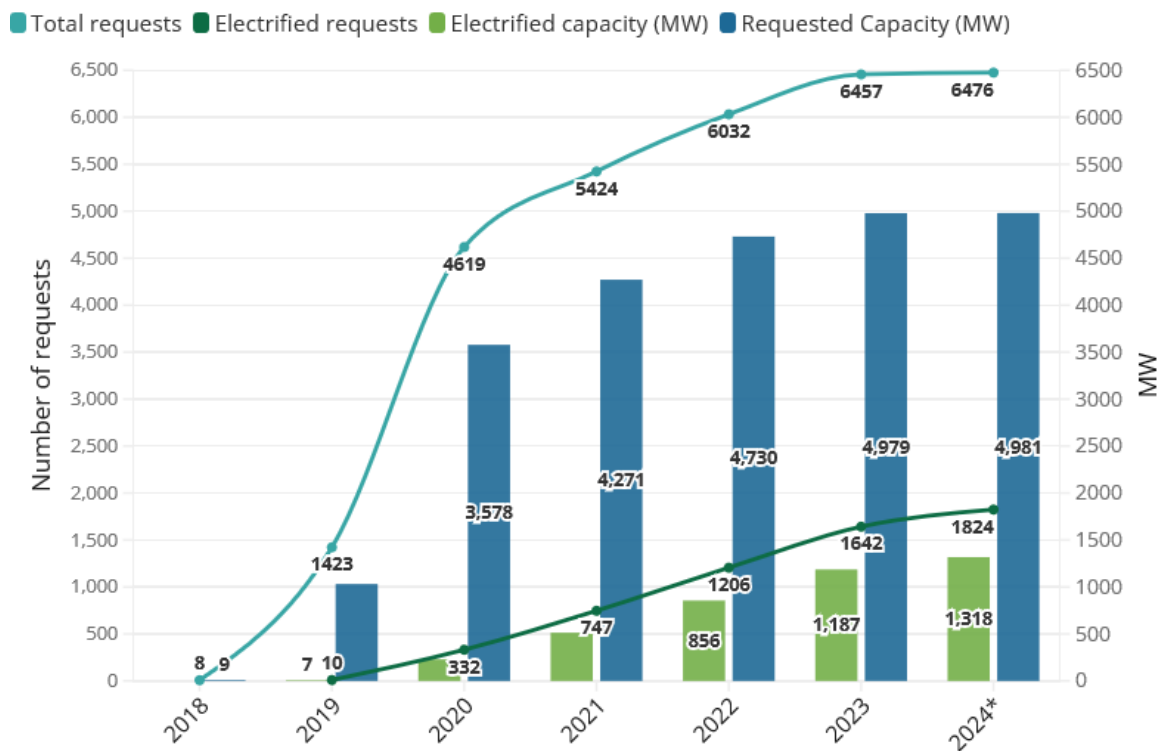
At the same time, the issue of grid unavailability persists, hindering the electrification of pending projects. As of July 2024, 3,072 projects -corresponding to 2,445 MW- had been notified of inability to connect by the HEDNO at some point during their life cycle. This capacity (2,445 MW) accounts for 49% of the total requested capacity by energy community projects (4,981 MW). Of these projects, 1,064 MW -namely 21% of energy community projects' requested capacity- were ultimately cancelled.

Certain projects, however, did move forward. Over the first seven months of 2024, 182 projects with a capacity of 131 MW were electrified. Nonetheless, a slowdown is evident; specifically, electrification declined by 33.8% in the first seven months of 2024 compared to the same period in 2023, during which 198 MW had been electrified.

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<sup>4</sup> September 2024.

<sup>5</sup> As of 01.11.2023 Energy Communities under Law no. 4513/2018 are not allowed to submit new requests to the competent Operator for new projects (whether commercial or self-consumption).



Source: HEDNO, The Green Tank processing  
 \*Data until July 2024

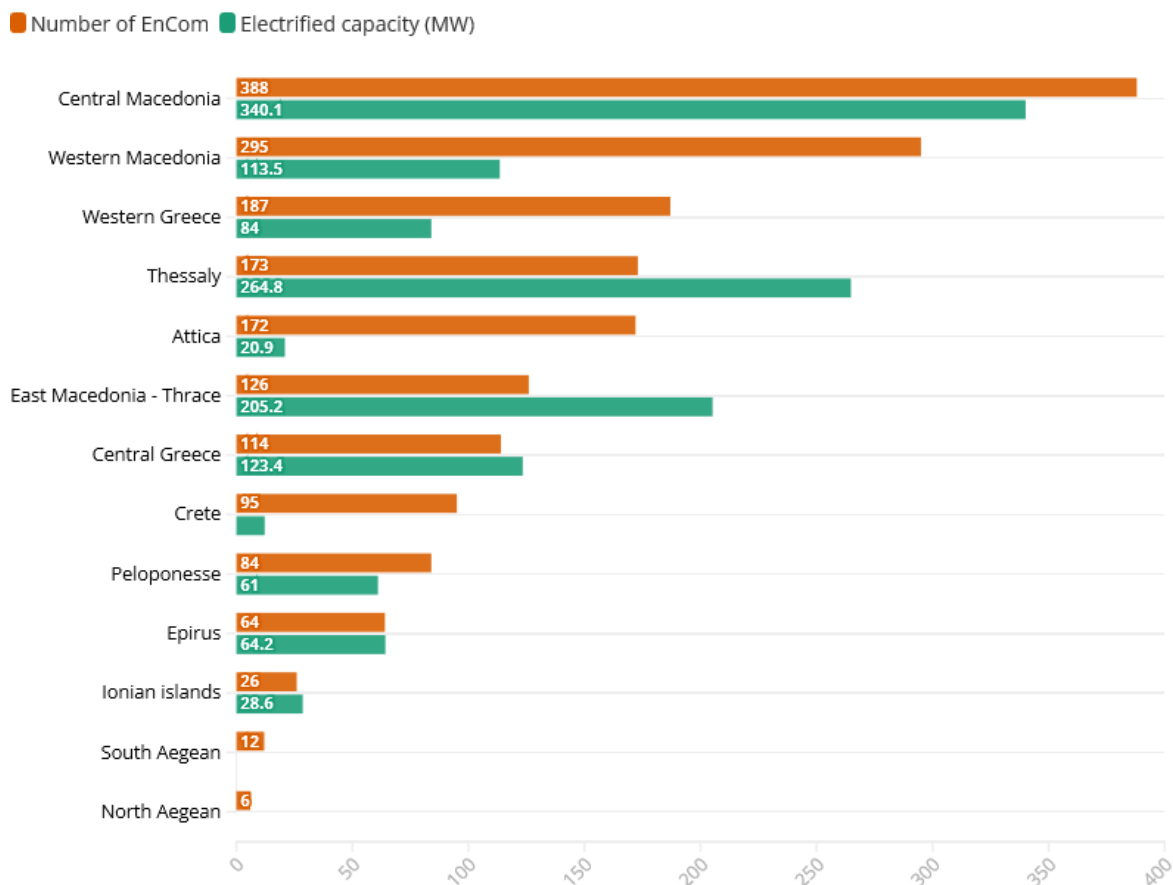
**Figure 2:** Evolution of the number and capacity of total and electrified RES project requests by energy communities over the period 2018-2024.

## Distribution by Region

Since the establishment of energy communities in 2018 and up to July 2024, most energy communities were set up in the Region of Central Macedonia (388); this region also saw the largest increase in the establishment of new energy communities in 2024 (+54). The same region also boasts the highest electrified capacity (340.1 MW), followed by Thessaly (264.8 MW) and Eastern Macedonia & Thrace (205.2 MW).

With regard to the number of energy communities, the lignite region of Western Macedonia ranks second (295); however, only three new communities were established in this region in 2024. In terms of electrified capacity (113.5 MW), Western Macedonia ranks fifth among regions.

Looking at Greece's islands, most energy communities have been established in Crete (95), including four new communities in 2024. Only one energy community was established in the North Aegean, while there were no new ones in the South Aegean and the Ionian. Nevertheless, the highest electrified capacity is found on the Ionian Islands: 28.6 MW, compared to 12.2 MW in Crete.



Source: HEDNO, GEMI, The Green Tank processing  
Capacity data until Jul' 2024, number of EnCom until Sep' 2024

**Figure 3: Number of energy communities and electrified capacity by Region.**

## Areas in Transition<sup>6</sup>

In Western Macedonia, the largest lignite region in the country, 295 energy communities have been established and have submitted 813 requests for RES projects with a total capacity of 646.5 MW. The majority of requests relate to commercial projects, while only 34 requests of 200 MW concern self-production projects. A total of 170 projects with a capacity of 113.5 MW have been electrified. Western Macedonia remains the region with the highest percentage of projects that have been unable to be connected to the grid by HEDNO (75%).

In October 2024, the energy community of the Municipality of Kozani received the first public funding for energy community self-production projects with a total capacity of 7 MW, using the relevant resources of the Just Transition Development Program (PDAM) 2021 - 2027<sup>7</sup>. Nonetheless, two other municipalities in the Region of Western Macedonia (Voio and Florina-Prespa) have submitted requests for projects with a total capacity of 11 MW, which

<sup>6</sup> Under transition are the lignite and coal-intensive areas included in the Just Transition Fund and for which a Territorial Just Transition Plan (TJTP) has been approved. In Greece, these are the two lignite areas of Western Macedonia and Arcadia (Megalopolis), as well as the North and South Aegean islands and Crete.

<sup>7</sup> EYDAM, 27.9.2023, Call entitled: "Support to energy communities for the development of self-production actions": <https://bit.ly/3HLLiP8>.

were notified of inability to connect by HEDNO. HEDNO's connection terms constitute a prerequisite for these projects' eligibility to receive funding from the Special Service of the Just Transition Development Program (EYDAM); thus, these available resources remain inaccessible.

In the other lignite region of Greece, Arcadia, both the number and projects of energy communities have remained stable since late 2023. A total of 41 energy communities have been established and 110 project requests amounting to 58.8 MW have been submitted. Of these, 43 relate to self-production projects with a capacity of 8.8 MW. In total, 42 projects with a capacity of 17.9 MW have been electrified in the Region of Arcadia.

## Commercial and Self-Production Projects by Energy Communities

Most project requests submitted by energy communities concern commercial projects. Correspondingly, the latter represent the majority of electrified projects. Of the total 1,318 MW electrified from 2018 to July 2024, 98% (1,290 MW) corresponds to commercial projects and merely 2% (28 MW) to self-production projects by energy communities.

Despite the small share of self-production projects' electrified capacity, momentum has been building over the past two years, as the growth rate of requests for these projects is higher than that for commercial projects. In 2022-2023, commercial project requests amounted to just 20, compared to 405 for self-production projects. Thus, it seems that -in the midst of the electricity price crisis- citizens have started using energy communities to meet their energy needs, namely, fulfilling the original purpose of this institution.

At the same time, the recent institutional changes introduced by Law no. 5037/2023 - namely, the limitations imposed on profit sharing in the case of commercial projects and the reservation of grid space exclusively for self-production projects (2 GW)- have impeded the further development of for-profit energy communities. This effect was clearly manifested in 2024, with all new requests submitted (19) relating exclusively to energy community self-production projects; similarly, in 2022-2023, requests for commercial projects amounted to just 20, compared to 405 for self-production projects.

Nevertheless, despite the growing interest in energy community self-production projects, their electrification rate remains much lower compared to that of commercial projects.

From 2018 to July 2024, requests for energy community commercial projects amount to 5,781, with a capacity of 4,591 MW. Of these requests, 1,737 have been electrified, with a total capacity of 1,290 MW (28.1%<sup>8</sup>). The majority of requests have been cancelled (2,323 requests totaling 1,867 MW, or 40.7% of commercial projects' total requested capacity), while 1,721 requests amounting to 1,434 MW (31.2% of commercial projects' total requested capacity) are pending<sup>9</sup>.

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<sup>8</sup> Share of commercial projects' electrified capacity out of the total capacity requested for commercial projects.

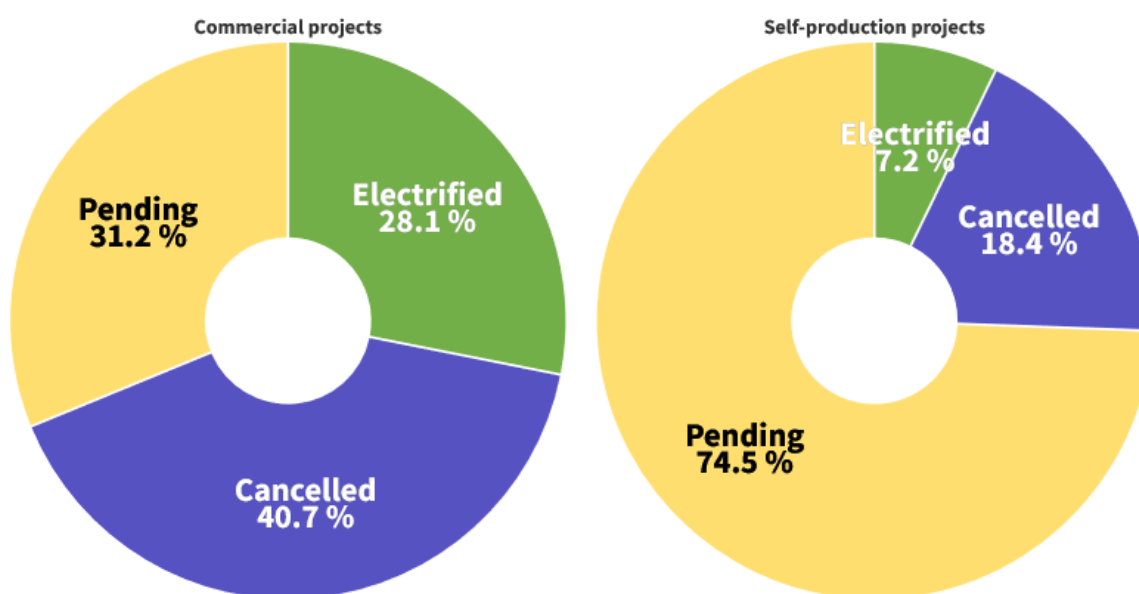
<sup>9</sup> 'Pending' refers to requests that have been neither electrified nor cancelled.

With regard to energy community self-production projects, by July 2024, 695 requests had been submitted with a total capacity of 390 MW. Merely 87 of these requests amounting to 28 MW (7.2%<sup>10</sup>) have been electrified, while the number of cancelled requests is twice as high (179 requests amounting to 72 MW, namely, 18.4% of self-production projects' total requested capacity). Most requests (429) are pending with a corresponding capacity of 291 MW (74.5% of self-production projects' total requested capacity). Given that 2 GW of grid space has been reserved exclusively for self-producers, accelerating the electrification of these projects is deemed feasible and necessary.

### Share of capacity to the total requested capacity

2024

■ Electrified ■ Cancelled ■ Pending



Source: HEDNO, The Green Tank processing  
\*Data until July 2024

**Figure 4:** Electrified, cancelled and pending capacity shares in the two categories of energy community projects (commercial and self-production), July 2024.

<sup>10</sup> Share of self-production projects' electrified capacity out of the total capacity requested for self-production projects.

## Self-Production of Electricity

Self-production projects are implemented by energy communities, as well as by individual households, farmers, businesses and other entities. The progress recorded steadily since 2021 in the electrification of self-production projects was maintained in the first seven months of 2024. Across all categories of self-production, 212 MW have been electrified, approximating the total capacity electrified throughout 2023 (236 MW). Consequently, this increased rate of self-production project electrification has resulted in a rise in the corresponding self-produced energy. It is estimated that, in the first seven months of 2024, the electricity produced by self-production systems amounted to 519 GWh<sup>11</sup> -double the amount produced over the corresponding period in 2023 (255 GWh)- and constituted 7.7% of the total energy produced by photovoltaics (PV)<sup>12</sup> nationwide during the same period (6,755GWh<sup>13</sup>).

Citizens' and businesses' interest in self-production projects remains undiminished, as manifested by the 10,934 requests for such projects submitted in the first seven months of 2024, totaling 133 MW in capacity. This is indeed impressive, considering the uncertainty which ensued the announcement regarding the gradual abolishment of net-metering and the latter's replacement by net-billing.

Overall, until July 2024, a total of 47,580 requests for self-production projects -totaling 2,219 MW in capacity- were submitted by citizens, businesses and energy communities. The majority of requests (71% of the requested capacity) concerned net-metering, while the rest (29%) related to virtual net-metering. More than half of the requested projects (24,687) with a capacity of 665 MW have been electrified, representing approximately 8% of the installed PV capacity nationwide. Of these 665 MW, the majority corresponds to projects using net-metering (616 MW); the remaining 49 MW correspond to virtual net-metering projects (28 MW by energy communities and 21 MW by households, businesses and other entities).

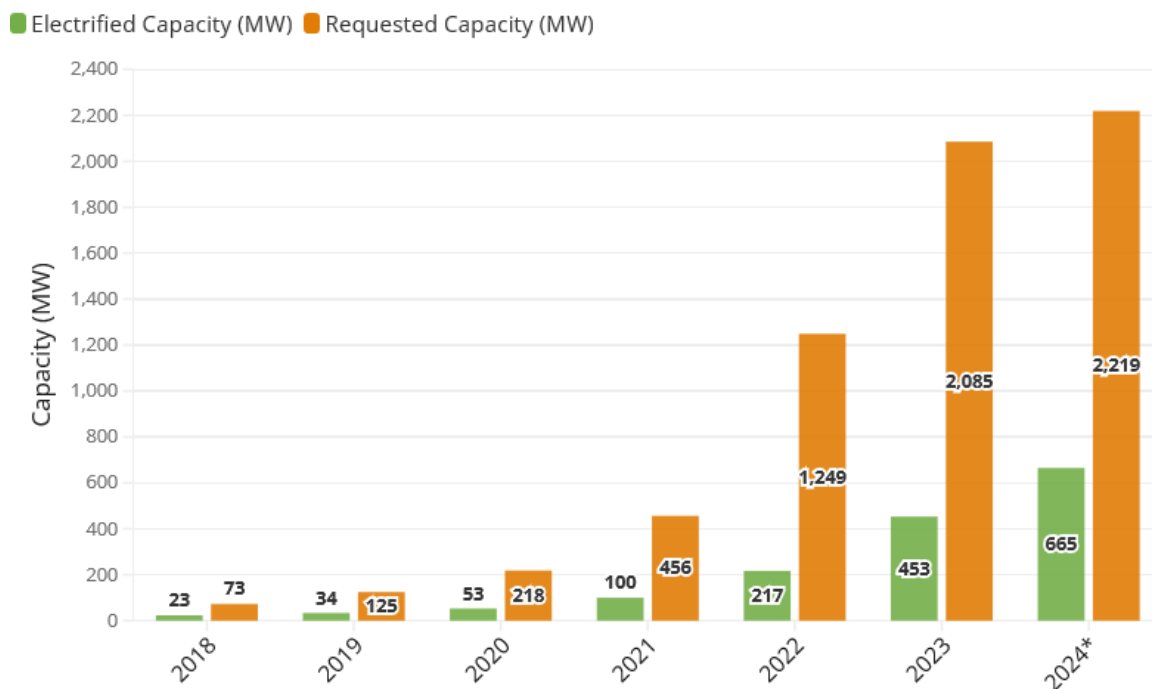
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<sup>11</sup> The energy is estimated for each month based on the installed capacity of net-metering and virtual net-metering systems (HEDNO) and a coefficient based on the capacity and energy produced by photovoltaic systems (DAPEEP)

<sup>12</sup> Photovoltaics are mentioned here because they constitute the technology predominantly used in self-production systems.

<sup>13</sup> Energy from self-production and other photovoltaic systems is included, according to the data reported by DAPEEP, 07.2024, <https://bit.ly/4hg0EoV>.

## Net metering & Virtual net metering



Source: HEDNO, The Green Tank processing

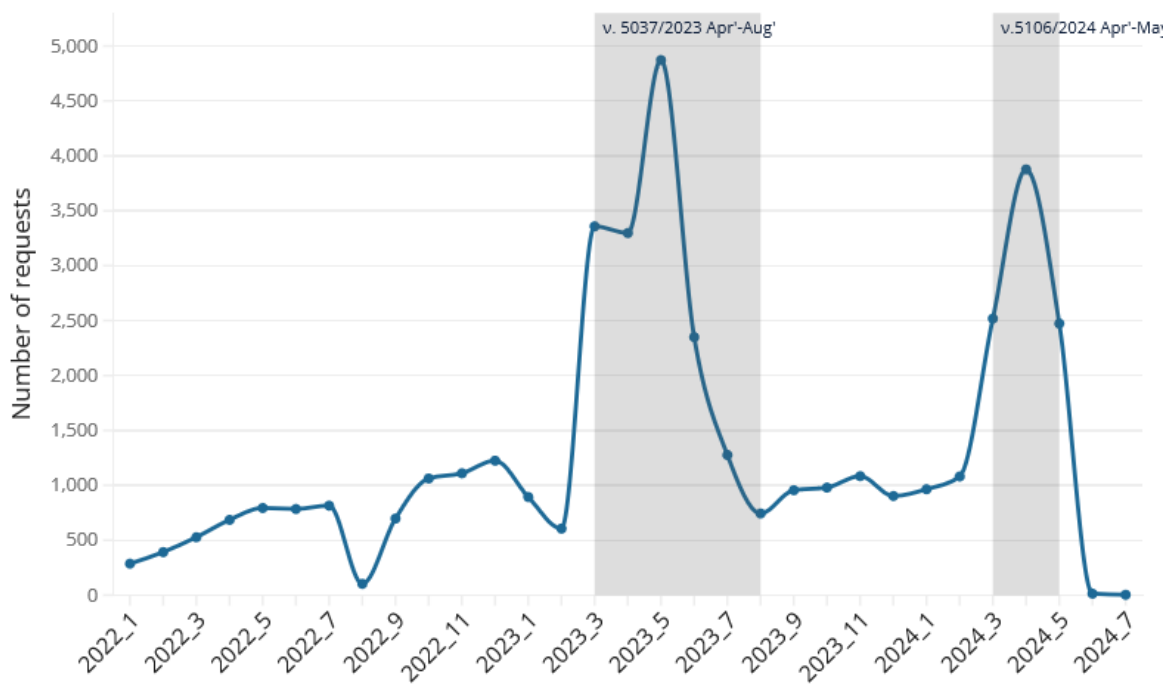
\*Data until July 2024

**Figure 5:** Number and capacity of self-production projects by citizens, energy communities and other entities (net-metering and virtual net-metering; 2018 - 2024).

The course of requests for self-production projects has been influenced by two factors: (a) the institutional changes that have taken place (see detailed section below) and (b) the lack of grid space availability.

Regarding the impact of institutional changes, as illustrated in Figure 6, requests peaked before the adoption of Law no. 5037/2024, which instituted net-billing and virtual net-billing; evidently, citizens and businesses rushed to take advantage of the economically favorable institutional framework of net-metering and virtual net-metering that was being abolished. The second peak in requests is observed prior to the adoption of Law no. 5106/2024, which abolished (virtual) net-metering for most categories of self-producers (including energy communities) and defined the categories of projects that can use the available electricity margins per substation.

2022-2024 (per month)



Source: HEDNO, The Green Tank processing  
 \*Data until July 2024

**Figure 6:** Number of requests for self-production projects per month, 2022-2024

The lack of available electricity space persistently hinders the growth of self-production projects' electrified capacity. Due to this obstacle, self-production projects with a total capacity of 779 MW -namely, 35% of their total requested capacity- have received a notification of inability to connect at some stage of the project life cycle. In addition, 9% (194 MW) of the requested capacity corresponds to self-production projects that were ultimately cancelled after having received a notification of inability to connect.

A large percentage (50.6%) of self-production projects remain pending, namely, the requests submitted for these projects have been neither electrified nor cancelled. This percentage corresponds to 1,123 MW, of which 291 MW correspond to self-production projects by energy communities. The sum of the electrified capacity and the capacity of pending self-production projects amounts to 1,788 MW, verging on the 2 GW of grid space reserved for self-production projects provided by Law no. 5037/2023. Therefore, the electrification rate of self-production projects should be intensified, given that there is room for connection without exhausting the aforementioned 2 GW; furthermore, it is imperative that the available grid space be expanded so as to accommodate citizens' and businesses' growing interest in meeting their electricity needs through self-production.

## Resources

### European Resources: Just Transition Development Program 2021 - 2027 (PDAM)

On 7 October 2024, a decision was issued<sup>14</sup> to include the self-production projects by the Energy Community of the Municipality of Kozani under the “Energy Transition - Climate Neutrality” Priority of the Just Transition Development Program 2021-2027 (PDAM); according to this decision, for the first time in Greece, an energy community will receive public funds for its projects. This positive development takes place one year following the issuance of the call entitled “Support to energy communities for the development of self-production actions” by the Special Service for Just Development Transition (EYDAM), which was budgeted at €41.7 million<sup>15</sup>. The energy community of the Municipality of Kozani will receive €5.4 million for the installation and operation of self-production projects with a total capacity of 7 MW. The project will employ virtual net-metering to meet the energy needs of its members, namely, the Municipality of Kozani; the Municipal Water Supply and Sewerage Company of the Municipality of Kozani (DEYAK); the Societe Anonyme of Waste Management of Western Macedonia (DIADYMA); the Management Company of the Industrial Park of Kozani; the Municipal Company of Active Urban Planning of the Region of Western Macedonia; and the “Development organization of the Municipality of Kozani”. The relevant call by the PDAM 2021 - 2027 regarding energy community self-production projects had to be amended four times in an attempt to resolve issues and promote the implementation of energy community projects in transition areas. This call will remain open until 31.12.2024 for the submission of funding requests by interested energy communities.

### National Resources for Just Transition

With regards to national resources, merely a fraction of the funds dedicated to Just Transition - obtained through the greenhouse gas emission allowances auctioning revenues- has been earmarked for energy communities in lignite areas. In total, the funds raised from 2018 to 2023 amount to €144,159,033.39. Of these, only €3 million have been reserved for energy communities - specifically, for the energy community of the Region of Western Macedonia and the Region’s Local Land Improvement Organizations (TOEV); there are no available data on the absorption status of these funds.

Pursuant to Law no. 5140/2024<sup>16</sup>, the management of national funds for the Just Transition of the lignite areas was transferred from the Green Fund to the Special Service for Just Development Transition, which also administers the European funds from the Just Transition

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<sup>14</sup> EYDAM, 07.10.2024, Decision on the inclusion of the project entitled “Supply, installation and commissioning of 7 PV virtual net-metering stations with a total capacity of 7MW” (MIS 6007002) under the “Energy Transition - Climate Neutrality” Priority of the “Just Transition Development Program 2021-2027”. <https://bit.ly/3UaPV5o>.

<sup>15</sup> EYDAM, 27.9.2023, Call entitled: “Support to energy communities for the development of self-production actions”: <https://bit.ly/48IECHg>.

<sup>16</sup> Law No. 5140/ 2024, GG A / 154/ 30-09-2024 “New Development Program for Public Investments and additional provisions”.

Fund (JTF). Thus, a single entity now manages all resources for the Just Transition; considering that the relevant planning (Just Transition Territorial Plans, Just Transition Development Program 2021 - 2027) includes energy communities, more resources should be allocated to projects combining self-production and batteries that are implemented by energy communities set up by citizens and small-medium enterprises (SMEs) in lignite areas.

## Institutional Developments

### Apollon Program

In May 2024, via Law no. 5106/2024<sup>17</sup>, the Ministry of Environment and Energy (YPEN) instituted the Apollon Program, which aims to reduce the energy costs of vulnerable households; regional and local authorities; General and Local Land Improvement Organizations (GOEV - TOEV); and Municipal Water Supply and Sewerage Companies (DEYAs). The program provides for the establishment of a Citizen Energy Community (CEC) in each region, with the above-mentioned entities of the same region participating as its members. In order to meet the needs of energy vulnerable households (beneficiaries of the Social Household Tariff A), this law foresees an additional nationwide CEC to be set up by the Central Union of Greek Municipalities or the Hellenic Agency for Local Development and Local Government (EEATAA). YPEN estimates<sup>18</sup> that the Apollon program will meet part of the electricity consumed by 332 municipalities to operate municipal buildings, street lighting and pumping stations; 127,500 Social Household Tariff A beneficiaries; 9,455 Water Supply and Sewerage Companies' electricity supplies; and 3,570 GOEV/TOEVs' electricity supplies.

The Apollon program will employ virtual net-billing. The RES projects intended to meet the aforementioned electricity needs will not belong to the established CECs; instead, they will be installed at a different location from the consumption facilities -in any Region nationwide- and will be managed by third parties. More specifically, the project will utilize mature private projects that already have connection terms and reserved electricity space. Indicatively, the installation of 1.1GW PV plants combined with batteries with a total capacity of 1.1 GWh (1h) is estimated to net approximately 1,620 GWh per year.

The project is budgeted at €120 million, while the cost of electricity for the beneficiaries after netting is expected to decrease by €150 million per year. According to article 104 of Law no. 5106/2024, the cost of the energy provided to offset the needs of the Apollon Program beneficiaries may be covered by the RES and CHP Special Account. However, the relevant Joint Ministerial Decision (JMD) by the Ministers of Environment & Energy and Economy & Finance has yet to be issued. The latter shall determine the program's sources of funding and the manner of financing eligible projects, including the necessary studies related to the size of the required installations; the funding of projects aiming to meet the beneficiaries' energy needs; the compensation or not of any surplus energy produced; the

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<sup>17</sup> Law No. 5106 / 2024, GG A / 63 / 01-05-2024 "Regulations to address the multifaceted impacts of climate change on: (a) water management; (b) forest management and protection; (c) urban resilience and policy; (d) combating unauthorized construction; (e) energy security; and other urgent provisions".

<sup>18</sup> YPEN, 03.11.2023, "7 questions and answers regarding the Apollon program"

incentives to further reduce the beneficiaries' energy consumption following program participation; and the compensation of suppliers for the energy to be offset.

August 2024 was set as the deadline for establishing the CECs across Greece's 13 Regions. However, as the process had not been completed, the Ministry of Environment and Energy offered an extension<sup>19</sup> until 31 December 2024. The additional (non-Regional) CEC which was foreseen by the program to meet 90% of vulnerable households' energy needs was launched in September 2024<sup>20</sup>. Nonetheless, CEC establishment across the country's 13 Regions remains largely incomplete. Thessaly was the first Region to welcome the Apollon Program, proceeding to establish its corresponding CEC in September 2024<sup>21</sup>. In the Region of Western Macedonia, the statute of the energy community was signed by its members in August 2024<sup>22</sup>, when the energy community was established. The Region of Epirus launched its CEC in September 2024<sup>23</sup>, while the Region of the Peloponnese is in the process of informing local stakeholders regarding the establishment of their respective energy community<sup>24</sup>. Upon publication of the present review, no other Region's CEC has been registered in the GEMI.

The Apollon Program foresees that a significant part of the energy needs of local entities and energy vulnerable households will be met via RES; therefore, it constitutes a step in the right direction. Troubling, however, is the fact that the institution of energy communities was selected to implement what are essentially bilateral contracts between Regions and RES producers. Contrary to the basic principles of energy communities, this is a centrally-organized scheme, barring the participation of other citizens, businesses and entities; moreover, the related projects and their management will not be carried out by the community itself. Furthermore, the connection of the Apollon Program projects, estimated to total or exceed 1.1 GW, raises concerns regarding the electricity space that will remain available -following its implementation- for other self-production projects by energy communities set up by citizens and SMEs<sup>25</sup>.

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<sup>19</sup> MD YPEN/DAPEEK/118289/3676 /2024, GG B 6017, Implementation of the Apollon Program, pursuant to paragraph 1. 10 of article 14D of Law No. 3468/2006 - Replacement of the decision of the Deputy Minister for the Environment and Energy under YPEN/DAPEEK/92881/2704/30.8.2024 "Extension of the deadline for the establishment of a Citizen Energy Community (CEC) by the Regions for their participation in the Apollon Program, of par. 6 of article 14D of Law no. 3468/2006, in accordance with par. 10 of Article 14D of Law No. 3468 (B' 4975)".

<sup>20</sup> Hellenic Agency for Local Development and Local Government (EEATAA), 25.09.2024, Press Release: Establishment of the 'Apollon' Citizen Energy Community, <https://bit.ly/3BFEbBf>.

<sup>21</sup> To Vima, 27.08.2024, Thessaly takes the lead: The 'Apollon' program for green energy is launched, <https://bit.ly/481Nlo1>.

<sup>22</sup> Chronos Kozanis newspaper, 29.08.2024, The Energy Community of Western Macedonia has been launched <https://bit.ly/483wVLC>.

<sup>23</sup> Diavoulefsi newspaper, 02.09.2024, The Energy Community of Epirus has been launched, <https://bit.ly/483wFw8>.

<sup>24</sup> Region of the Peloponnese, 17.09.2024, Press Release: High stakeholder participation in the briefing on the Energy Community of the Peloponnese and the 'APOLLON' program <https://bit.ly/3NmCH1F>.

<sup>25</sup> The Green Tank's comments and recommendations during the public consultation on YPEN's omnibus bill, April 2024, <https://bit.ly/3AgYPYg>.

## Institutional Changes regarding Self-Production

Law no. 5106/2024<sup>17</sup>, along with Law no.5151/2024<sup>26</sup>, amended the categories of self-producers that may employ net-metering and virtual net-metering; moreover, these Laws modified the electricity margins per substation for the installation of self-production projects.

In particular, Law no. 5106/2024 (par. 11 art. 110) provided that, as of 1 May 2024, virtual net-metering may be employed by beneficiaries of the "Photovoltaics on the Roof" program; farmers for installations with a capacity of up to 30 kW; general government entities; and those aiming to meet the energy needs of citizens living below the poverty line and/or households affected by energy poverty. Subsequently, Law no. 5151/2024 restricted even further the categories of self-producers who can take advantage of (virtual) net-metering to merely include "Photovoltaics on the Roof" program beneficiaries and farmers for installations with a capacity of up to 30 kWp.

Following this regulation, which modified article 64 of Law no. 5037/2023, Renewable Energy Communities (RECs) and Citizen Energy Communities (CECs) are now excluded from the list of self-producers that can apply virtual net-metering. Consequently, virtual net-billing constitutes the only institutional tool available to energy communities for energy netting.

With regard to capacity margins, Law no. 5106/2024 (par. 3 article 110) ensured a 10 MW absorption margin per substation, in addition to the existing margin, exclusively for the installation of RES and CHP plants by self-producers of all categories. Nonetheless, via Law no. 5151/2024, this margin was once more modified to include special categories of commercial projects as well.

The additional margin is available in all substations of the Hellenic Electricity Distribution Network (HEDN)<sup>27</sup>, including areas with saturated networks; only the network of the Non-Interconnected Islands is excluded. The 10 MW capacity margin per substation is distributed as follows:

(a) 6MW of margin per substation allocated to:

(aa) Self-production stations by households, including stations of the special photovoltaics development program, for a total capacity of up to 3 MW. A maximum capacity limit of 10.8 kW per consumption supply has been set.

(ab) Self-production stations relating to the primary sector, for a total capacity of up to 3 MW. A maximum capacity limit of 50 kW per consumption supply has been set.

(b) 3.8 MW of margin per substation allocated to:

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<sup>26</sup> Law no. 5151/2024, GG 173 / B / 04.11.2024, "Arrangements to modernise waste management, improve the energy saving framework, develop energy projects and address urban planning issues."

<sup>27</sup> Hellenic Electricity Distribution Network (HEDN), managed by HEDNO.

- (ba) the secondary sector;
  - (bb) the tertiary sector (other uses);
  - (bc) Renewable Energy Communities and Citizen Energy Communities with a maximum installed capacity of 200 kW;
  - (bd) biogas or biomass production plants with a maximum installed capacity of 100 kW, and small hydroelectric plants with a maximum installed capacity of 1 MW.
- (c) 0,2 MW of margin per substation allocated to the production or self-production stations of small wind systems with an installed capacity or maximum output of up to 60 kW.

Exceptionally, the capacity limit is set at 200 kW for self-production stations employing net-metering and self-consumption stations employing net-billing or virtual net-billing that are implemented by welfare legal persons under public law, ecclesiastical legal persons, charitable foundations, private non-profit organizations, which provide social welfare services; as well as by regional and local authorities for meeting the needs of municipal kindergartens, day-care centers, primary and secondary education units, health centers and hospitals, and municipal and public sports centers.

In addition, the provisions of Law no. 5151/2024 (par. 2 article 28) modify the distribution of the available margins for RES and CHP plants per substation or per high-voltage/medium-voltage transformer (HV/MV), beyond the 10 MW capacity. More specifically, the margin is raised to 60% (from 20% provided for by Law no. 4951/2022) for self-production projects (installation of plants and storage) and restricted to 40% (from 80%) in the case of commercial projects.

Through the efforts to address the critical issue of grid access, recent regulations promote self-production. Nevertheless, as most requested energy community self-production projects range from 500 kW to 1 MW, the instituted maximum absorption capacity (200 kW) per energy community self-production project has a minimal impact on resolving this issue. This regulation would be more beneficial for energy community self-production projects if the maximum capacity per project was set at 1 MW; moreover, a distinct category of electricity margin allocation per substation should be provided exclusively for energy community self-production projects with a total capacity of 2 MW.

Furthermore, Law no. 5151/2024 (article 28) includes provisions on the transition from (virtual) net-metering to (virtual) net-billing. In particular, it provides for the possibility of converting permits and licenses of self-production stations (using net-metering and virtual net-metering) to enable them to operate using both net- and virtual net-billing. Furthermore, from 31 October 2024 onwards, the competent Operators will issue Final Connection Offers or Connection Contracts for Notified Stations for self-production using exclusively net- and virtual net-billing; the requests already submitted will be examined ex officio as requests for self-production employing net- and virtual net-billing (except in the case of farmers). As in the case of (virtual) net-metering requests, net- and virtual net-billing requests will be classified in Priority Group B for assessment.

In addition, article 28 of Law no. 5151/2024 facilitates the development of self-production projects by energy communities involving local authorities that have already been launched.

In particular, the article stipulates that the requests submitted by 30 September 2024 for self-production stations using virtual net-metering by Energy Communities under Law 4513/2018 exclusively with the participation, individually or jointly, of either local authorities of first and second degree or municipal or public utilities of local authorities and legal entities of local authorities, and until the exhaustion of a total capacity of 150 MW, should be examined on a priority basis as requests for virtual net billing or should fall within the provisions of the Ministerial Decision of the Ministry of Environment and Energy that will follow regarding the period of operation, in order to ensure the sustainability of the projects.

Finally, requests for self-production stations that do not inject energy into the grid shall be processed at top priority.

## Ministerial Decision on Net-billing

September 2024 saw the issuance of a Ministerial Decision (MD)<sup>28</sup> comprehensively describing, inter alia, the implementation of the new self-production model, namely (virtual) net-billing. In particular, it clarified the terms and conditions for the implementation of self-consumption in all netting models: (a) net-metering; (b) net-billing (with the possibility of injecting or not injecting the surplus energy into the grid); (c) virtual net-metering; and (d) virtual net-billing. This decision was long overdue, given that it was issued 15 months after the new netting schemes had been introduced by Law no. 5037/2023.

According to the MD on the implementation framework for self-production, the amounts of energy netted shall be offset after one year -rather than three- in the case of new connections employing (virtual) net-metering; with regard to existing connections, netting is maintained at three years. Furthermore, the capacity that may be netted through (virtual) net-billing shall equal the total agreed consumption capacity. The compensation price for the surplus energy injected into the grid shall be set on the basis of the wholesale market price at the time of injection. For the Non-Interconnected Islands, surplus energy shall be compensated on the basis of the Special Purchase Price instituted for RES and CHP technologies, as issued by the Renewable Energy Sources Operator & Guarantees of Origin S.A. (DAPEEP) and cleared by the HEDNO.

The Ministerial Decision describes in detail the implementation of netting in each model, in projects including storage, and at different voltage levels; the contracts to be signed; as well as the Special Program entitled “Domestic Photovoltaics” for installations of up to 10.8kW using (virtual) net-billing, which is intended for households. It also addresses specific issues regarding the implementation of virtual net-metering by energy communities (for instance, representation by different suppliers) and defines the regulated fees to be applied to the energy absorbed by the grid on each final bill.

This MD also clarifies the manner in which joint self-consumption (collective self-consumption) will be implemented. This is a regulation which concerns self-consumers in buildings and apartment buildings, as two or more self-consumers located in the same

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<sup>28</sup> MD YPEN/D APEEK/93976/2772, GG B 5074/ 05.09.2024.

building may jointly participate in the installation of stations and regulate among them the distribution of the self-produced energy, notwithstanding any applicable network fees and other related charges, fees, duties and taxes. In this case, virtual net-billing shall apply. The collective self-consumption scheme may also include the electricity consumption of buildings' common areas.

Encouragingly, it is foreseen that domestic self-producers using (virtual) net-billing be represented by DAPEEP acting as Aggregator<sup>29</sup>. This provision should also apply to Energy Communities set up by citizens and SMEs, in order to reduce costs and incentivize the implementation of self-production projects.

Furthermore, the Ministerial Decision does not extend to energy communities using net-billing and not wishing to receive compensation for their surplus energy the possibility to share the latter with others outside the Energy Community. Provisions should be introduced allowing energy communities to record surplus energy and conclude a new contract so as to share it with other consumers (non-members). Similarly, the MD could also provide for shared self-production in apartment buildings; namely, the surplus energy from one block of apartments could be shared with the neighboring apartment building, in lieu of market compensation. Such provisions are in line with the energy sharing paradigm introduced by the recent revision of the new European electricity market directive<sup>30</sup>.

## National Energy and Climate Plan (NECP)

In October 2024, the Ministry of Environment and Energy presented the new NECP at a relevant event<sup>31</sup>, as well as in Parliament to the members of the Standing Committee on Production and Trade and the Special Standing Committee on Environmental Protection<sup>32</sup>. In both briefings, the issue of citizen participation in the energy transition was underlined; self-production was presented as part of the policy for active energy consumers. The Deputy Minister stated that there are already 21,000 beneficiaries of small photovoltaic subsidy schemes (households and farmers), while €165 million have been spent on subsidies to households and farmers. The measures foreseen in the new NECP to promote self-production include the reservation of electricity space at grid substations for self-production projects, the simplification of the licensing procedure, as well as the absolute prioritization of grid space for self-production projects in buildings. Moreover, dynamic pricing was introduced to incentivize consumers to participate in demand response, with the aim of meeting 60% of total grid consumption by the end of 2025.

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<sup>29</sup> A new electricity market entity offering aggregation services to all interested RES producers to represent their projects in the market.

<sup>30</sup> Directive (EU) 2024/1711 of the European Parliament and of the Council of 13 June 2024 amending Directives (EU) 2018/2001 and (EU) 2019/944 as regards improving the Union's electricity market design, 26.06.2024, <https://bit.ly/3AoTVZi>.

<sup>31</sup> YPEN, 11.10.2024, Press Release: "Presentation of the new National Energy and Climate Plan by the Ministry", <https://bit.ly/4fo2bru>.

<sup>32</sup> Hellenic Parliament, 16.10.2024, Joint meeting of the Standing Committee on Production and Trade and the Special Standing Committee on Environmental Protection to discuss the agenda: "Briefing of the members of the Committees, in accordance with article 36 (par.5) of the Regulation of the Parliament, by the Minister of Environment and Energy, Mr. Theodoros Skylakakis and the Deputy Minister of Environment and Energy and Chairman of the Interministerial Committee for Energy and Climate, Ms. Alexandra Sdoukou, on the revised National Energy and Climate Plan (NECP)", <https://bit.ly/4ei98t5>.

***Despite the European Commission’s recommendations<sup>33</sup> (December 2023), the new NECP includes no specific quantitative target regarding self-production and energy communities.*** In particular, the Commission calls on Greece to “*elaborate further on the measures for ensuring an enabling framework to promote self-consumption and energy communities, including on specific quantitative goals*”.

An examination of other Member States’ NECPs illustrates that setting quantitative targets for self-production and energy communities is feasible. For instance, Spain sets a target for self-production to represent 25% of installed PV capacity by 2030 (19 GW of self-production out of a total of 76 GW of PV). Energy communities are also explicitly mentioned among the factors expected to contribute to both meeting the targets set for the housing sector and improving energy efficiency<sup>34</sup>.

As -at the time of publication- the NECP has not been finalized, there is room to include precise and measurable targets specifically for energy communities and self-production. ***Considering that the sum of the electrified capacity and the capacity of pending self-production projects (1,788 GW) is already verging on the limit of 2 GW set by Law no. 5037/2023, the updated NECP should introduce a discrete target of 3 GW of self-production by 2030.***

## Parliamentary Scrutiny

Both energy communities and self-production have attracted the attention of Greece’s political parties; the latter continue to highlight these issues’ different aspects, through parliamentary questions and petitions.

In particular, the Apollon Project has featured prominently in parliamentary discussions. In August 2024, New Democracy (Nea Dimokratia)<sup>35</sup> -the governing Party- tabled a question on the implementation of an ‘Apollon II’ program for Thessaly’s flood-affected businesses with the cooperation of the Chambers or the Region, in order to drastically reduce their energy costs (up to 50%). In her reply, the Deputy Minister of Environment and Energy did not rule out future programs along the lines of the Apollon Program with different beneficiaries; however, she underlined the preparatory work that has been carried out to properly design this program and focused on the need to proceed immediately and unobtrusively with the existing Apollon Program.

New Left (Nea Aristera)<sup>36</sup> has highlighted the Apollon Program’s mismatch with the spirit and principles of energy communities, as well as issues regarding program implementation. The competent Ministry was invited to clarify the following: how the program’s funding will be determined; whether state aid issues will arise; when the Ministerial Decision specifying the implementation of the program is expected to be issued; how virtual net-billing will meet the municipalities’ needs such as street lighting; how this program is compatible with energy

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<sup>33</sup> Commission Recommendation on the draft updated National Energy and Climate Plan of Greece, December 2023, <https://bit.ly/4871xMr>.

<sup>34</sup> European Commission, 2024, National Energy and Climate Plan of Spain, <https://bit.ly/4f5YqXK>.

<sup>35</sup> Hellenic Parliament (2024), Question, C. Kapetanos, <https://bit.ly/3C2QVCi>.

<sup>36</sup> Hellenic Parliament (2024), Question, P. Perka along with 4 New Left MPs, <https://bit.ly/4hiSR9Q>.

communities already established by local authorities; and whether these communities will be compulsorily integrated into the Apollon Program. This question has not yet been answered by the competent Ministry.

Parliamentary scrutiny has also addressed the challenges that energy communities face in the country's lignite areas. In its petition, the Coalition for the Radical Left (SYRIZA)<sup>37</sup> highlighted the demands made by the Association of Photovoltaic Investors of Western Macedonia. Furthermore, it raised its own concerns about the Ministry of Environment's modifications of projects' grid connection priority resulting in the sidelining of commercial projects by energy communities and other small investors in favor of projects developed by Public Power Corporation (PPC) Renewables and Rheinisch-Westfälische Elektrizitätswerk (RWE), two companies that are active in the region. The Ministry of Environment and Energy responded by, on the one hand, outlining the legislative actions taken so as to support both the primary sector and energy-intensive industrial activities (Law no. 5095 /2024) and, on the other hand, clarifying the assessment process of requests regarding priority connection to the grid, specifically with regard to energy community projects. In addition, the Ministry listed the legislative actions taken to support energy communities overall (reduction of the one-off connection fee; exemption from the obligation to provide a letter of guarantee to be granted connection terms; incorporation of relevant European directives into Law no. 5037/2023; financial incentives; and support measures) and described the Apollon Program.

PASOK - Movement for Change (KINAL)<sup>38</sup> has highlighted the importance of energy communities for a Just Transition in lignite areas and the lack of available electrical space for their projects. Specifically, it submitted a question to the competent ministries regarding their assessment of the development of energy communities in lignite areas, and, in particular, in Arcadia; furthermore, it inquired on the status of EYDAM's call for energy communities, and on the initiatives proposed to ensure that energy community projects in the lignite area of Megalopolis will be given priority to connect to the grid. In its response, EYDAM outlined its program of support for energy communities under the Just Transition Development Program 2021 - 2027; moreover, it also highlighted the lack of electrical space as a major problem that has been identified and which, in fact, constitutes a reason for rejecting proposals. Specifically, regarding the Region of Arcadia, this call has not received any funding proposals by regional energy communities. Exploring ways to resolve this issue, EYDAM has extended the call's deadline and -together with the competent Ministry and the Operator- seeks to find a solution, especially with regard to the areas in transition. For its part, the Ministry of Environment and Energy listed all the legislative initiatives taken pertaining to energy communities; HEDNO reported the forecasts vis-a-vis the Peloponnese's saturated network, as well as data on the connection or rejection of energy community projects to the latter.

In a different question on RES development in Western Macedonia<sup>39</sup>, PASOK - Movement for Change voiced concerns regarding the uncontrolled development of projects by large companies at the expense of commercial projects by local authorities and energy communities. The competent Minister responded by presenting the evolution of RES projects

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<sup>37</sup> Hellenic Parliament (2024), Petition, K. Vetta, <https://bit.ly/3C8E7KQ>.

<sup>38</sup> Hellenic Parliament (2024), Question, O. Konstantinopoulos, <https://bit.ly/4hnfZUN>.

<sup>39</sup> Hellenic Parliament (2024), Question, P. Koukoulopoulos, <https://bit.ly/48qz3xg>.

-and particularly smaller photovoltaic projects, which in 2026 are estimated to verge on 10.7 GW- and stating that, in 2023, the Independent Power Transmission Operator (IPTO) and HEDNO had received grid-related investments amounting to €1.2 million. He also stressed that “energy democracy should not burden the consumer”; that the government’s policies include discontinuing RES project subsidies and transitioning from net-metering to net-billing, and continuing the efforts to balance the development of small and large projects, explaining that Western Macedonia hosts a higher number of projects due to its infrastructure and history.

The use of energy communities as a means to reduce the cost of agricultural production was highlighted in two questions by PASOK - Movement for Change. The first question<sup>40</sup> focused on the fact that self-production projects of energy communities set up by municipalities in Western Greece -intended to meet the energy costs of Local Land Improvement Organizations (TOEVs)- have been brought to a halt due to the priority system governing the assessment of grid connection requests; the competent Ministry was asked whether it intends to change the priority of request assessment. The second question<sup>41</sup> concerned the rejection of virtual net-metering projects by energy communities set up by Crete’s TOEVs on the part of HEDNO due to incomplete files; the competent Ministry was asked whether it intends to accept the energy communities’ objections so as to prevent request cancellation and whether this issue could be resolved through legislation. Finally, the question also related to the existence of available grid space in Crete for the connection of the aforementioned projects by energy communities set up by TOEVs. The Ministry of Environment and Energy replied that the energy needs of projects by the aforementioned energy communities (namely those set up by Western Greece’s municipalities and those set up by Crete’s TOEVs) will be addressed through the Apollon Program; moreover, the Ministry listed all the legislative initiatives taken -in cooperation with the Ministry of Rural Development and Food- to support the energy costs of the agricultural sector. With regard to the energy communities set up by TOEVs in Crete, the HEDNO issued a statement documenting the lawful rejection of the relevant requests. Referring to the provision of additional grid space, the Ministry of Environment replied that it is expecting the Operator’s relevant recommendation and that, if at a future date conditions are met and additional electrical space is provided, a net-billing request could be submitted anew.

Finally, the New Left addressed the providers’ implementation of virtual net-metering in energy community projects. In a question submitted<sup>42</sup>, the party representative pointed out that despite projects being electrified, netting is either not applied or poorly applied by the electricity providers, causing uncertainty to energy community members. In his reply, the competent Minister acknowledged this problem and stressed that providers have an obligation to immediately resolve any relevant obstacles and meet the terms of the agreements already concluded with the energy communities. He also guaranteed that existing virtual net-metering projects will continue to operate under this netting model and that the state will ensure this operation by all means, even if providers are unable to adapt. However, he clarified that, henceforth, all new projects shall use virtual net-billing.

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<sup>40</sup>Hellenic Parliament (2024), Question, C. Staraka - F.Parasyris, <https://bit.ly/3Yp9pVc>.

<sup>41</sup> Hellenic Parliament (2024), Question, A. Spyridaki along with 4 KINAL MPs, <https://bit.ly/3Yl0qUS>.

<sup>42</sup> Hellenic Parliament (2024), Question, P. Perka, <https://bit.ly/40piyiZ>.

## Policy Recommendations

To strengthen the institution of self-production and energy communities, as well as their contribution to a just energy transition, The Green Tank has submitted a series of recommendations to the public debate and the competent bodies. Specifically:

- Establish specific quantitative targets and measures in the new National Energy and Climate Plan (NECP) for self-production and energy communities. In particular, set a 3 GW discrete target for self-production by 2030.
- Ensure sufficient grid for self-production projects by energy communities by establishing a distinct category of capacity margin allocation per substation with a total capacity of 2 MW exclusively for self-production projects by energy communities. Adjustment of the maximum absorption capacity per community energy self-production project to 1 MW.
- Immediate resolution of problems of implementation of virtual net metering by providers for existing self-production projects by energy communities, in line with the commitments of the Ministry of Environment and Energy as expressed in the parliamentary scrutiny.
- Support energy communities for a smooth transition from virtual net metering to virtual net billing, through subsidies for storage projects and reduction of representation costs, by designating DAPEEP as Aggregator for energy communities by citizens and SMEs as well. In addition, it is proposed to assess the impact of the possibility of sharing surplus energy with other consumers on investment, instead of selling it on the market
- Use existing national and European resources to support energy communities set up by citizens and SMEs across the country. Especially for the lignite areas, due to increased interest and needs, it is proposed to immediately publish a new call for support to energy communities by citizens and SMEs from the resources of the Just Transition Development Program 2021 - 2027, following the model of the corresponding call for municipalities and related bodies.
- Facilitate access to bank lending for self-production community energy projects by citizens and SMEs, through the creation of a guarantee mechanism. This can be achieved by setting up a development fund, which could additionally subsidise the costs of project maturity and the costs of installing storage infrastructure.
- Use the resources of the Emissions Trading System (ETS), including the resources of the new ETS 2 for buildings and road transport, to finance energy community projects regarding efficiency, electrification of heating and electromobility.
- Enhance citizen participation in large-scale RES projects, with a focus on lignite areas by instituting share ownership and reserving part of the shares to be purchased by energy communities.

