

10 October 2025

Feedback to Call for Evidence - EU energy security framework (revision)

Submission by **The Green Tank**

The Green Tank welcomes the Commission's initiative to revise the EU Energy Security Framework.

The revision comes at a critical moment. Following the 2022 energy crisis, the EU advanced key initiatives such as REPowerEU, the Gas Demand Reduction Regulation, and higher renewable energy ambitions under the revised Renewable Energy Directive under Fit for 55 package. These steps aimed to enhance energy security and reduce gas dependency. Yet, Europe's energy system remains heavily reliant on fossil fuels. As the EU moves toward climate neutrality, energy security must be redefined around renewables, electrification, efficiency, clean flexibility, new clean carriers such as green hydrogen and citizen participation.

Energy security & transition from fossil fuels to renewables

The revision must provide safeguards to end the fossil fuel era which has led to insecurity and price volatility. New LNG and gas infrastructure should be limited and carefully managed, to avoid becoming stranded assets. Member States should be required to adopt fossil fuel phase-out plans with specific end dates; so far only [coal phase out dates exist to the majority of MS](#). A [binding methane reduction target of at least 75 % by 2030](#) for the energy sector should be set.

Security of supply must be built on diversified renewable energy sources, combined with wider electrification, energy efficiency, storage, and demand-side management to ensure grid stability and affordability. Green hydrogen should play a key role in decarbonizing hard-to-abate sectors - industry and transport.

The framework should integrate existing policies such as ETS2 which promote electrification through e-mobility and replacement of gas boilers with electricity-based heating (e.g. PV and heat pumps). It should prioritize cross-border interconnections to enable higher renewable penetration and faster electricity decarbonization. Digitalization must be supported to enhance clean flexibility such as storage and demand response, while safeguarding cybersecurity and ensuring social inclusion in the digital energy landscape.

Distributed RES and Citizens participation

Energy communities, energy sharing, and self-consumption must be explicitly supported, as they enhance local resilience and empower citizens to participate directly in the clean energy transition, while contributing to demand-side flexibility. In Greece, citizen engagement is already evident, with [self-consumption projects reaching 1 GW of capacity](#). The revised framework should build on the Citizens Energy Package to remove financial, regulatory, and technical barriers, enabling fair and widespread participation in the transition.

Governance, regulation, financing

Besides ensuring consistency with climate neutrality, transparency, monitoring, must be central principles. Streamlining should enhance efficiency without leading to deregulation. Financing mechanisms must prioritize consumer protection and align with climate objectives. Fossil fuels should no longer receive support through instruments such as capacity remuneration schemes. Where such schemes are considered, as in Greece, they should explicitly incentivize non-fossil flexibility solutions and safeguard consumers from price volatility.

Feedback on policy options

- *Smart streamlining*: Simplification can accelerate implementation but must not weaken environmental safeguards, transparency, or monitoring obligations.
- *Targeted reinforcement*: Crisis-specific provisions and EU alert levels are welcome but should explicitly support decarbonization, efficiency, and electrification.
- *Cross-sectoral transformation*: Integrating renewables, electricity, interconnections, storage, and demand-side management enables a holistic, EU-wide energy security strategy and should be the framework's core.
- *EU-driven action*: Centralized governance improves coordination, but excessive centralization can hinder citizen participation, local energy projects, and small-scale flexibility solutions.

Relevant recent references by the Green Tank:

- The Green Tank - Facets (2025) [Recommendations for policies and measures to mitigate ETS2 implementation impacts in Greece](#)

This study assesses the impacts of the new Emissions Trading System for buildings and road transport (ETS2) on Greek households and puts forth well-documented recommendations for the mitigation of energy and transport vulnerability. The proposed interventions could be included in the National Social Climate Plan and financed by the available resources of the Social Climate Fund (SCF); the remaining revenues of the ETS2; and part of the public revenues from the existing Emissions Trading System for electricity production, heavy industry, and aviation (ETS1).

- The Green Tank - Facets (2024) [Strategies for reducing the carbon footprint and tackling energy poverty in Greek households](#)

Analysis by The Green Tank and Facets examines 8 scenarios for the residential housing sector and 2 scenarios for the road transport sector and identifies the most efficient combinations of measures that will reduce both the carbon footprint and energy bills of households by 2030. The implementation of these measures can result in €1.6 billion annual economic benefits in 2030 for Greek households, while also reducing emissions from both sectors by up to 7.1 million tons of CO₂ in the same year.

- The Green Tank (2025) [Energy Communities & Self-Production in Greece #7](#)

The analysis is based on the latest available data from the General Commercial Register GEMI (April 2025) and the Hellenic Electricity Distribution Network Operator (HEDNO) up to March 2025³. Emphasis is placed on the advancement of both energy communities and self-production projects within 2024, as well as during the first quarter of 2025. In addition, the latest developments regarding the relevant institutional framework, parliamentary scrutiny, and resources are presented.

- The Green Tank (2025) [Policy Brief: Capacity Renumeration Mechanisms](#)

The policy brief analyzes the provisions of European legislation regarding capacity remuneration mechanisms (CRMs), outlines the technologies that other European countries are choosing to support via these mechanisms, and examines how these choices have so far affected consumers' costs. It examines also Greece's case for the possible design of a new capacity mechanism and sets specific recommendations.