

## Nordenergi position on grids package

The Grids Package published by the European Commission on 10/12/2025 contains legislative proposals aimed at accelerating the construction of electricity grids crucial to the EU's energy transition and in particular the development of cross-border interconnections.

This memo compiles the main views of Nordenergi in Grids Package.

Nordenergi welcomes the grid package proposed by the European Commission as a vital component of the green transition in Europe and as an important step toward ensuring a robust and resilient electricity grid across Europe.

The goal of accelerating the development of European electricity grids is commendable. In order to enable the energy transition and electrification, rapid and proactive development of electricity grids is essential. Two critical prerequisites for network development can be identified: smooth permitting processes and adequate financing. Of these, the Commission's proposal focuses in particular on permitting.

### Permitting file

- **+** The package's objectives to streamline and accelerate permitting procedures and proposal for timelines for processing **all relevant administrative procedures** related to transmission and distribution networks is welcome. However, ensuring alignment between relevant EU-legislation as well as with national environmental permitting and sectoral legislation is vital.
- **+** We welcome the Commission's efforts to promote the securing of **sufficient resources for permit processing**.
- **+** We support measures to speed up permitting via e.g. the extension of **overriding public interest** in both renewable energy directive and for electricity network infrastructure.
- **★** The Commission proposes permitting-focused amendments to the Renewable Energy Directive as well as the Electricity Market and Gas Market Directives. It is important that the **amendments remain strictly limited to the revisions proposed** in the Commission's proposal. Electricity market regulation was reformed just two years ago, and Member States must be given time to implement it. The Renewable Energy Directive will be reviewed in full in a separate process later this year. (RED and EMD)

- ★ Implementation of a **single digital portal** should be decided by member state to ensure that it is based on specific national needs
- ⊖ We do not support **EU level obligations** for benefit sharing of renewable energy. Such regulation would increase the administrative and financial burden of renewable energy projects. Benefits are already shared via various national and local mechanisms such as through property taxes, but also, for example, through employment. We believe that voluntary benefit-sharing works best to promote acceptance. As a priority, the benefit-sharing obligation should be removed or the provision amended so that municipal property tax fulfils the obligation. We consider that the 10 MW threshold in case of obligation is very low. (RED Article 15d (3))
- ⊖ We do not support the obligation in for a mandatory **interaction facilitator**. We believe that facilitation by an independent third party designated by a Member State may create procedural complexity and uncertainty about the legal effects. The regulation would increase the administrative and financial burden of renewable energy projects. Interaction between operators and stakeholders can best be promoted through voluntary means. We consider that the 10 MW threshold in case of obligation is very low. (RED Article 15d (4))
- ⊕ ⊖ The proposal includes procedural rules and timelines for processing “**grid connection permits**”. It is positive that the Commission pays attention to the timelines of the grid operator’s response. However, it is important that the response options sufficiently cover different situations and leave enough room to create truly streamlined processes. It should be clarified that DSOs grid connection procedures often depend on available TSO capacity, and deadlines therefore require clear obligations for DSOs as well as TSOs. We also highlight the fact that grid connection agreement is quite different from e.g. environmental permits. (RED, Article 17)
- ⊕ ⊖ The proposal aims to accelerate especially renewal projects of **existing network infrastructure** so that these projects can be exempted from several different assessment procedures. We consider it unfortunate that the proposal limits flexibility to projects where land use in the area does not expand. In most network projects, corridors need to be widened. The **exemption should be more broadly** available for projects implemented along **existing routes**. (EMD, Article 8 (9))

### TEN-E regulation

- **+** Updating the PCI/PMI criteria to include investments aimed particularly at improving energy security is welcome.
- **+ -** Efficient use of existing network infrastructure is desirable. However, adequate network capacity plays a key role in the resilience of the energy system. In addition to efficient use of existing infrastructure, network development must also focus on increasing network capacity. This is important to develop network resilience against climate threats and other threats such as hostile actions.

We also need to highlight that necessary grid investments require sufficient financing through network tariffs and connection fees at both transmission and distribution levels. The financial operating conditions of system operators are strongly tied to the regulatory methods set by the national energy regulator. Currently, in several European countries, including the Nordics, electricity network regulatory methods slow down network development. The Commission's grid package does not provide new legislation to advance this issue and remains lacking in this respect.

*Nordenergi is the joint collaboration between the Nordic associations for electricity producers, suppliers and distributors. Members are Swedenergy, Green Power Denmark, Renewable Norway, Finnish Energy and Samorka. Overall, Nordenergi represents more than 2,000 market actors (member companies), most of them active in the electricity sector, but also in other areas such as district heating, gas and services. For more information regarding Nordenergi please visit [www.nordenergi.eu](http://www.nordenergi.eu). EU Transparency register number: 85161125283-02.*