

## Nordenergi's reaction to ITRE draft report on the revised RED II focusing on additionality

Nordenergi represents the energy sectors of Finland, Sweden, Iceland, Denmark and Norway. We all have a high degree of existing renewable and CO<sub>2</sub>-free power production, with national roadmaps for deployment of renewable hydrogen production and other renewable fuels.

Nordenergi is recommending revisiting the 'Additionality' definition during the revised REDII process. Hydrogen is a massive part of the Energy System Integration, as it can create flexibility on both the supply and the demand side. Implementing too stringent additionality rules will make hydrogen production suboptimized, and in worst case impossible. Nordenergi therefor welcomes changes to the suggested rules from the European Commission.

### Positive amendments from the ITRE-committee

Nordenergi is positive to many of the suggested amendments (AM) in the ITRE draft report on the revised Renewable Energy Directive II (RED II). There are a long list of amendments in the draft report, which can have major or minor impacts for Nordenergi's members. We will, for now, focus on the amendments concerning additionality: AM 60-64.

AM 62, 63 and 64 will simplify the framework related to proving the renewable character of the electricity used to produce RFNBO (Renewable Fuels of Non-Biological Origin). AM 63 is a much more pragmatic approach than the suggestion from the European Commission. We propose one change to the amendment 63 to secure that any installation producing renewable electricity should be able to sign a PPA.

We strongly support the use of Guarantees of Origin (GO) to document the renewable nature of the power used and that it is claimed only once.

For countries with a high share of renewable power, such as the Nordics, the possibility of referring to the RES share in the national grid mix is a less bureaucratic and more efficient method than to require specific PPAs. We therefore oppose the suggestion in AM 60 and 61 of removing the fourth subparagraph of art 27.3. However, it is important that double counting of renewable electricity is avoided and addressed.

Thank you for considering our input.

Best regards, Nordenergi

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## Amendment 63 – ITRE Draft Report on Revised REDII Article 27.3

(iiiia) the sixth subparagraph is replaced by the following:

*Electricity that has been taken from the grid may be counted as fully renewable provided that it is produced exclusively from renewable sources and the renewable properties have been demonstrated, ensuring that the renewable properties of that electricity are claimed only once and only in one end-use sector. This can be achieved by either following any of the following:*

- (a) *to demonstrate the renewable properties, producers of renewable fuels of non-biological origin should be required to conclude one or more renewable power purchase agreements generating electricity for an amount that is at least equivalent to the amount of electricity that is claimed as fully renewable. The balance between the renewable electricity purchased through one or several power purchase agreements and the amount of electricity taken from the grid to produce renewable fuels of non-biological origin shall be achieved on a quarterly basis. From 1 January 2026, the balance between the renewable electricity purchased through one or several power purchase agreements and the amount of electricity taken from the grid to produce renewable fuels of non-biological origin shall be achieved on a daily basis. A power purchase agreement can be signed with **any existing installation producing renewable electricity provided that the installation does not receive support in form of operating aid or investment aid at the date the contract enters into force, or such support has ended.***
- (b) *a granular guarantee of origin pursuant to Article 19(2) may be used in order to demonstrate the renewable properties of the electricity used for the production of renewable fuels of non-biological origin and to ensure that the renewable properties of that electricity are claimed only once and only in one end-use sector.*