

Nordenergi's Feedback to the European Commission Consultation on the European Grid Package

Nordenergi, representing the Nordic energy industry, welcomes the chance to contribute. Our input supports stronger EU cooperation while respecting national specificities.

### **Investments and funding**

Investments in grids require adequate funding through network tariffs and connection fees. Additional EU funding mechanisms might provide some help in certain countries but won't solve the larger issue.

Regulatory uncertainty is the most critical barrier to rapid and cost-effective grid development. Grid investments are capital-intensive and long-term. Grid companies compete for funding with other operators and industries. Frequent changes in regulations and unclear incentive structures create risks that can delay projects, increase capital costs, and undermine investor confidence. To ensure grid expansion in line with electrification and the integration of renewable energy, the EU, MSs and NRAs must prioritise regulatory stability with adequate returns on invested capital.

### **Customers' energy costs**

Customers' energy costs shall be seen as a whole. While electrification may increase total grid costs, customers' overall energy costs (incl. grid charges, electricity, gas, oil, gasoline etc.) can be lowered. Investments in grids will be evened out by increases in electricity consumption due to electrification avoiding increases in tariffs when cost reflective.

## Distribution network development plans

DNDPs should be holistic and strategic rather than focused on individual projects, to avoid complexity and administrative burdens. EU-level harmonization of distribution network planning is not beneficial due to varying operational environments among MSs, and there is no need for more regulation on DNDPs.

### **Digitalisation and Data Sharing**

Through data, automation, and advanced analytics, both TSOs and DSOs can optimize operations, identify bottlenecks earlier, and facilitate the integration of distributed generation and flexibility. The regulation should support digitalisation and data sharing through right incentives. This must, however, be balanced against costs and security risks. Investments in digitalisation can be significant and must therefore be targeted and based on CBAs. Moreover, digitalisation increases exposure to cyber threats, requiring robust security solutions and clear responsibilities. The EU should support the development of common standards and secure platforms for data sharing, while allowing flexibility to adapt solutions to national conditions and risk profiles.

# Permitting Processes - One size doesn't fit all

Increased harmonisation of permitting processes at the EU level could risk creating an unnecessarily bureaucratic framework that does not sufficiently account for the geographical, technological, and institutional differences between Member States. EU should facilitate the exchange of best practices whilst allowing Member States the flexibility to develop effective national solutions.

# **Connection Queue Management**

The handling of grid connection queues should remain a national responsibility, as the challenges and solutions vary significantly between Member States.

### Implementing existing provisions before introducing new ones

In the past years, new EU legislation has been introduced to improve the electricity market, especially the EMD and revision of the RED. We therefore believe that in the coming years, when it comes to DSOs, there should be a focus on sharing best practices and national implementation of the existing EU legislation.

#### Our contacts:

Renewable	es Norway
-----------	-----------

Christine Kaaløy

Christine.kaaløy@fornybarnorge.no

+47 92 25 53 19

### **Swedenergy**

Tomas Malmström

Tomas.malmstrom@energiforetagen.se

+46 8 677 25 02

# **Finnish Energy**

Ina Lehto

ina.lehto@energia.fi

+358 40 570 558

#### **Green Power Denmark**

Tyge Helms Skov-Wium

ths@greenpowerdenmark.dk

+45 25 29 19 82

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. EU Transparency register number: 85161125283-02.









