

BVEG-input regarding guidance on designating renewables acceleration areas (Accele-RES)

The “Bundesverband Erdgas, Erdöl and Geoenergie e.V. (BVEG)” – as the German association representing the interests of German natural gas and oil producers, the operators of underground storage facilities, the interests of geothermal energy providers and the service providers active in this industry – welcomes the Accele-RES initiative, which aims to speed up the transposition and implementation of the recently revised Renewable Energy Directive ((EU) 2023/2413) and to accelerate the deployment of renewable energy projects. To provide Member States with practical advice on issues such as initial steps, existing good practices as well as digital and mapping tools is essential in further developing the necessary energy sources and infrastructure for the energy transition.

Having this in mind, BVEG suggest the following clarifications and amendments with regard to the planned Accele-RES initiative:

1. Ensure all relevant renewable energy sources and storage facilities are considered

The Accele-RES initiative has been triggered by the European Wind Power Action Plan but should equally consider power, heating and cooling sources as well as storage systems. Generally all viable options of renewable energy should be considered and integrated in an equal manner, because all of them are vital in order to achieve the climate targets.

2. Clarification of the role of underground storage facilities

Currently articles 15b and c, which relate to the mapping of acceleration areas for renewable energy development that are in line with the national contribution of that renewable energy category’s target capacity of the respective member state, include storage facilities as part of the infrastructure of acceleration areas. We applaud that storage capacity is considered here. However, it is unclear what types of storage facilities are taken into account, leaving room for interpretation to e.g. solely include battery-electrical storage and heat storage facilities. Due to the important role that underground storage facilities can play in storing large quantities of renewable energy in the form of hydrogen or compressed air, e.g. as a backup of the energy grid, it is essential that these are also considered as part of the acceleration areas mapping. This is particularly important, as underground storage facilities are heavily dependent on the local geology and thus restraint in the choice of their location. Because of this, we suggest clarifying that “storage” facilities include various types of storage such as, underground storage facilities that store hydrogen or compressed air in the sense of the directive.

3. Consideration of the specifics of underground storage facilities

As described above, underground storage facilities are an essential part of the energy system transformation, because they have the ability to secure our energy supply in times of scarcity and to compensate fluctuations within the grid. At the same time, underground storage facilities are restricted by the circumstance that their location is very much dependent on the local geological underground (e.g. salt domes). Therefore, we consider it necessary that underground storage facilities benefit from the same exceptions in article 15e (1) b) such as grid infrastructure projects in article 15e (1) a) regarding Natura 2000 sites, in case there is no proportionate alternative available.

4. Restrictions regarding acceleration areas related to Natura 2000 sites should only apply to above ground installations

Common-type geothermal plants of industrial size and high temperature have to be deep - several hundred to several thousand meters of depth to draw heat. This is limited to specific geological

formations and is only available in certain areas. Additionally, for efficiency reasons, heat can only be transported over rather short distances. In order to ensure that geothermal energy can play its role in the energy transition, it must not be unnecessarily restricted in its specific location. Hence, we suggest clarifying that only the above-ground installations of geothermal plants, which typically have a considerably smaller footprint than their respective subsurface installations such as wellbores, are not allowed in Natura 2000 sites. Deep wellbores of geothermal plants in the subsurface have at maximum a negligible effect on flora and fauna above ground and thus do not pose a threat to Natura 2000 sites.

5. “Heat” should be expanded to “Heat and Cold”

Thermal energy needs have so far mainly been heating needs in Europe, but there is an increasing demand for cooling needs nowadays, too –for industrial (e.g. food cooling), commercial and residential purposes. However, so far, the Accele-RES only considers “heat” in its considerations. Renewable energy and renewable energy storage can also offer cooling, which is why we call to ensure that the renewable energy acceleration areas for heat also apply to cooling.

6. Take into account the specifics of geothermal energy

For an acceleration of the development of geothermal energy systems, it is important to ensure access to subsurface data, and to define rather large areas for acceleration, typically on a “geothermal play” level (an area with a specific geological setting), and with a significant industrial, residential etc. heat demand.

7. Recognition of the importance of energy storage for electricity and heating and cooling

Storage facilities are currently only considered as part of the infrastructure to integrate renewable energy into the electricity market. But at the same time, underground storage facilities can also be an essential part of the heating network, e.g. if hydrogen is used for heating or burned in combined heat and power plants. Hence, the unnecessary restriction for storage facilities being “necessary for the integration of renewable energy into the power grid” as e.g. in article 15e (1) b) should be deleted as it constitutes an unnecessary limitation that may even hamper climate goals.

8. Ensure that each technology has its specific acceleration area

Different technologies such as onshore wind, deep geothermal, shallow geothermal, or heat storage have different requirements regarding their location and hence should have individually fitting acceleration areas. As an example, while geothermal heating and cooling plants and geothermal heat storage plants share a lot of technological traits, they typically operate at different ambient reservoir temperatures and hence different depths and geological strata. Thus, it is important to ensure that each technology is considered independently with regard to its specific acceleration area.

9. Consider to size acceleration areas not only for member states but also for the European Union

As described in article 15c, it is at the freedom of member states to choose the size of the acceleration areas. However, there are certain technology-specific European-Union-goals, for example a tripling of the geothermal energy output until 2030. Therefore, it would be beneficial if a union-wide statistic on the cumulative potential of all member states for such technologies would be made available in order to be able to compare it to the union’s own targets. If the cumulative targets are lower than that of the cumulative member states’, the commission should be tasked to communicate this to the member states and give advice on how to align the goals.