

Response to the Commission's call for evidence on the revision of the EU's Energy Security Framework

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Introduction

Energy communities are legal entities that empower citizens to take ownership of their local transition projects, from solar panel and wind installations, to citizen-led renovations, electric vehicle sharing schemes, or renewable thermal energy initiatives. Energy communities carry out these projects oftentimes thanks to volunteers, lacking financial resources and overall adequate conditions to do so, yet energy communities and their citizens add significant value to Europe's energy transition. They sponsor social projects, offer free renovation advice and joint purchases, trainings and skilling, and reinvest the revenues into expansions or new transition activities.

According to the European Commission, energy communities that produce and consume locally are a way to tackle the energy crisis by shielding consumers from volatile wholesale markets, and by reducing losses during transport, helping to manage demand on the grid¹. In a recent report by the Council of European Energy Regulators (CEER), renewable energy communities mitigated the effects of high market prices for members in Italy and the Netherlands during the most recent energy crisis². Furthermore, cost-benefit analyses in the Flemish and Brussels regions of Belgium of local network tariff component for shared energy show that with the appropriate market design (e.g. smartly designed time of use tariffs), such localized network tariff incentives can help energy communities that share energy contribute to peak shaving.³

Energy communities have become a key market actor in home-grown renewable energy, reducing local communities' import dependency, enhancing their resilience through social initiatives, and thus contributing to Europe's energy security and strategic independence. Energy communities are also rapidly growing in Central and Eastern Europe, as a means to accelerate the phase out of fossil imports, and build local community resilience. This is particularly visible in countries like Poland. [The LIFE COMET](#) project is helping build national coalitions for community energy in several CEE countries, ultimately improving the national regulatory framework, paving the way for more community energy projects.

¹ Taylor, K. (18 September 2022). Euractiv – [‘How community-led renewables could help solve the energy crisis’](#)

²

CEER (2024). Impact of high market prices on renewables, p 24-25.

³

Brugel (2023). [Coûts-avantages relative aux communautés et au partage d'électricité](#) ; and Energy Ville (2023). [Kosten-batenanalyse betreffende de bijdragen aan de ontlasting van het Vlaamse elektriciteitsdistributienet van hernieuwbareenergiegemeenschappen, energiegemeenschappen van burgers, betrokken personen van de verkoop van groene stroom conform artikel 7.2.3 Energiedecreet of de actieve afnemers in een gebouw, en analyse van de resulterende relevante vergoedingen.](#)

Recommendations:

We encourage the European Commission to pay particular attention to the following points in the revision of the Energy Security Framework:

- 1. Support holistic approaches:** Enhancing Europe's energy security will require a holistic approach covering energy efficiency in our homes and industries, changes in behaviour to reduce energy consumption, increasing the recyclability and re-use of critical raw materials, and barring fossil fuels from entering the market while accelerating the roll-out of renewable energy sources. Energy communities contribute to several of these objectives, as they carry-out energy efficiency measures through citizen-led renovations and community-led heating and cooling, they lead to behavioural changes of 10% reductions in energy consumption⁴, and accelerate the roll-out of renewable energy across the EU. **Supporting energy communities with financing and capacity building** through the Energy Security Framework would contribute to the achievement of several EU objectives.
- 2. Detail new requirements for co-ownership** of commercially developed renewables projects, effectively creating a right of local communities to choose whether to co-invest in local renewable energy projects. This could be achieved by requiring municipalities to include citizens and (where existing) energy communities in the development of RES. This is usually done through cooperation agreements and/or the purchase of services, but in some cases by purchasing parts in the energy community. Through such a public share, the citizen control over the thermal project is anchored, private financing is unlocked as equity can be invested, and social acceptance is ensured through the not-for-profit and one-person-one-vote principles. The revision of the EU's Energy Security framework should **set an EU level policy objective for community ownership of renewable energy production**, supported by national and sub-national objectives for citizen and local community ownership of RES.
- 3. Protection from energy price shocks:** Energy security also covers citizen's ability to afford energy bills. The number of EU citizens unable to heat their homes grew by 16.8 million people in 2 years alone (2021-2023)⁵, bringing the total number to 1

⁴ N. Sifakis et al. 'How much energy efficient are renewable energy sources cooperatives initiatives?', 2020.

⁵ European Commission, *Energy Poverty*, link: https://energy.ec.europa.eu/topics/markets-and-consumers/energy-consumers-and-prosumers/energy-poverty_en

in 10 Europeans. The Security Framework should **include access to essential services as established in the European Pillar of Social Rights**, in order to acknowledge and expand the work of social economy actors. Vulnerable households must be protected from debt through **disconnection bans**.

Community Case in Focus | As part of the PowerUp project, **Ecopower (BE)** and the city of Eeklo launched an initiative to help vulnerable households access cooperative green energy. The city **prefinances a social share (€250)** for participants, which is **repaid through a savings plan** (at about €3/month). This allows households to immediately benefit from at-cost renewable energy while also making them full cooperative members. To assist participants, an Ecopower staff member and a representative from the municipality are available every Monday at the Eeklo city office, providing step-by-step guidance on joining the project. In the first year, they managed to generate a **reduction of about 300 euros for participants**.

4. **Produce distinct Commission guidance on energy communities** that covers building out enabling frameworks (Article 22 paragraph 4 of the Renewable Energy Directive), assessing potential and barriers for energy communities at the national level, energy community definitions, registration, monitoring and oversight, design of investment support mechanisms and renewables support schemes, integration of energy communities into local, regional and national energy planning, developing and supporting secondary structures (federations and coalitions), supporting community initiatives that work on energy poverty, and collaboration with municipalities.
5. **Support the financing of energy community projects** through:
 - **Committing the European Investment Bank to create a Guarantee Facility** and help unlock low interest loans by national promotional and commercial banks in every Member State (“an InvestEU for energy communities”);
 - **Supporting national community energy expert organisations (e.g. federations and coalitions)** to provide capacity building and technical assistance, including through One-Stop-Shops); A prominent example comes from France, where regional authorities have provided structural funding to Energie Partagee, the national federation of energy communities, which in turn provides on-the-ground counselling to households on how to access renewable energy and energy efficiency schemes⁶
 - **Work with Member States to create Community Energy Financing Schemes (CEFS)** and provide financial instruments (e.g. guarantees, cheap loans, equity

⁶ REScoop.eu, <https://www.rescoop.eu/news-and-events/stories/success-story-ensuring-eu-funds-reach-local-energy-communities>

funding) for cost-intensive activities such as energy efficiency, renovation and heating and cooling initiatives; These schemes have been formally developed through the [LIFE ACCE project](#) targeting 7 EU countries (RO, HR, DE, FR, BE, NL, ES). Through the course of the 3 year project they have managed to set up revolving funds **that have triggered over 738 million euros in citizen and private capital**. Community energy projects generate 2 to 8 more capital for local economies compared to private projects. This ensures regional cohesion, and ultimately local resilience.;

- **Creation of a capacity building forum targeting banks** so they can learn more about how to finance energy community projects (e.g. through an Investors Dialogue format).
 - **Leverage the Social Climate Fund to support energy communities.** From community-district heating projects in Denmark, to Municipal-led community projects in Poland and Lithuania, and cooperative renovation One Stop Shops in Ireland, energy communities are well suited to implement projects that tackle energy poverty and ensure affordability. Grants targeting their risky development phases could ultimately crowd in additional capital.
 - **Acknowledge energy communities in the upcoming negotiations of the Multiannual Financial Framework (2028-2034).** Provide earmarked, multi-year and adequate funding for energy communities, ensuring that the LIFE-CET-ENERCOM program is maintained, or replaced with something equally ambitious, as part of a different instrument (e.g., European Competitiveness Fun).
6. **Take action to enhance the role of non-price criteria in auctions and tenders**, for instance through revisions to the Net Zero Industry Act, EU public procurement rules, and by providing guidance (i.e. Social Procurement Criteria) for local and regional authorities so they can better support energy communities through concessions.
 7. **Grid access:** Reserve grid access for energy communities and other locally-driven projects by citizens and local authorities. In addition, supporting citizen and community participation in integrated planning for electricity distribution, heating and cooling, and spatial planning for RES development, would increase social acceptability of RES initiatives.
 8. **Enhance demand-side flexibility:** Reducing or shifting energy demand in turn reduces the amount of generation required, as well as the need for costly grid investment, and facilitated the uptake of more volatile renewable energy in the system, thereby lowering costs for citizens and bolstering energy security. Fully utilizing the power of

demand-side flexibility provides both day-to-day and long-term resource efficiency and system stabilization.⁷

Community Case in Focus | Electra Energy (EL), in cooperation with 13 partners, are developing digital tools to increase flexibility (demand-side response) and energy efficiency in the residential sector through their DR-RISE project. The tool will allow end-consumers to choose their preferred comfort level, risk level, and operating actions to help them make educated decisions in terms of their daily energy use. End users will be able to shift their consumption when there is more RES in the grid, lowering its costs and emissions.

⁷ Regulatory Assistance Project, *'Market Access for Demand-Side Flexibility'*, 2025.