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COVER NOTE

From: Secretary-General of the European Commission, signed by Ms Martine DEPREZ, Director

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To: Ms Thérèse BLANCHET, Secretary-General of the Council of the European Union

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Subject: COMMISSION STAFF WORKING DOCUMENT STAKEHOLDER CONSULTATION - SYNOPSIS REPORT Synopsis Report of the Call for Evidence Accompanying the document Commission Recommendation on removing barriers to the development of power purchase agreements and other energy purchase agreements

Delegations will find attached document SWD(2026) 118 final.

Encl.: SWD(2026) 118 final



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COMMISSION STAFF WORKING DOCUMENT
STAKEHOLDER CONSULTATION - SYNOPSIS REPORT

Synopsis Report of the Call for Evidence

Accompanying the document

Commission Recommendation

**on removing barriers to the development of power purchase agreements and other
energy purchase agreements**

{C(2026) 2676 final}

1. Introduction

The Renewable Energy Directive (Directive (EU) 2018/2001, as amended by Directive (EU) 2023/2413) and the Electricity Market Regulation (Regulation (EU) 2019/943, as amended by Regulation (EU) 2024/1747) promote the development of power purchase agreements (PPAs). PPAs are long-term bilateral contracts between electricity generators and consumers. These contracts help to finance new clean energy installations and, at the same time, secure stable prices for electricity consumers. Both of the above legal acts aim to remove regulatory and non-regulatory barriers to PPAs. The Electricity Market Regulation requires the Commission to assess the barriers to PPAs and make recommendations to Member States on their removal. For the preparation of the Commission Recommendation on the removal of barriers for the development of PPAs and other Energy Purchase Agreements, the Commission carried out a call for evidence, published in the Commission's consultation portal "Have your Say".

The objective of the consultation was to gather views from public and private stakeholders, including citizens on the proposed scope and content of the initiative, as regards specific barriers to the development of PPAs. The main stakeholders targeted for feedback on these barriers were clean energy generators and project developers, flexibility project developers and flexibility services providers, medium and large energy consumers, electricity suppliers, electricity system operators, PPA market intermediaries such as market platform operators and service providers, relevant public organisations, such as public buyers or national energy regulators.

A quantitative and qualitative analysis of the comments received to the call for evidence, was carried out.

This document should be regarded solely as a summary of the contributions made by stakeholders through this consultation process. It cannot in any circumstances be regarded as the official position of the Commission or its services and thus it is not binding for the Commission. Responses to the consultation activities cannot be considered as a representative sample of the views of the EU population.

2. Call for evidence

In total, 133 replies were received in response to the call for evidence, whereas two replies were submitted twice and excluded for further analysis. Most (57) came from companies and businesses, 55 from business associations, 7 from EU citizens, 5 from non-governmental organisations, 4 from other, 2 from academic/research institutions and 1 each from a public authority, an environmental organisation and a consumer organisation (see figure 1 below). In terms of geographical spread, most replies came from Belgium (24), France (23) and Germany (13). A smaller proportion of replies came from other Member States, namely Poland (9), Italy (9), Slovakia (5), Netherlands (5), Austria (5), Ireland (4), Denmark (4), Czechia (4), Spain (4), Greece (3), and 2 submissions each from Sweden, Romania, Portugal, Finland, Estonia, and Bulgaria. Respondents from non-EU countries including the United Kingdom (5), the United States (2), Switzerland and Norway (1 submission each) also submitted replies.

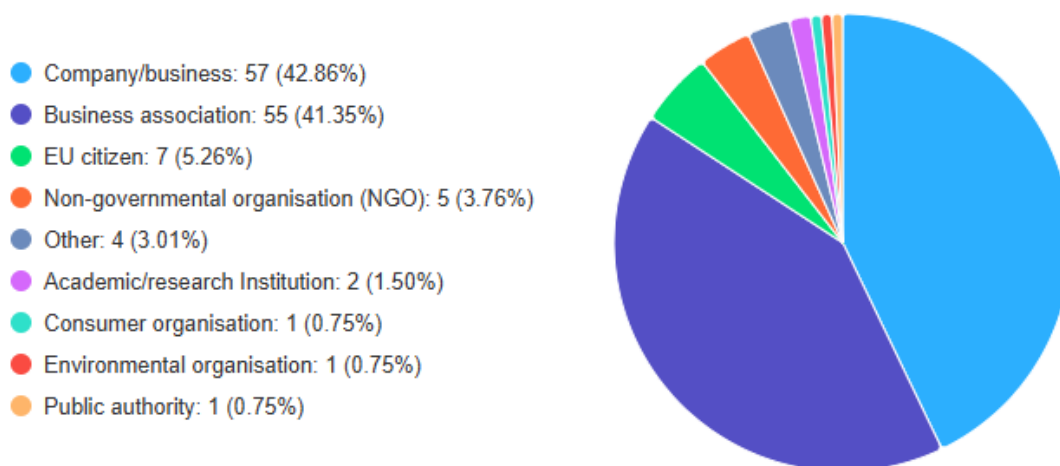


Fig. 1: Overview stakeholder replies per sector

The call for evidence indicates broad and consistent support among respondents for efforts to remove barriers to PPAs. Many stakeholders underlined that PPAs are an important enabler for renewable energy investments while at the same time helping to provide more stable prices for electricity consumers.

A substantial number of contributions pointed to the potential role of financial instruments to mitigate counterparty default risk, such as state-backed guarantees, in reducing credit-risk barriers and facilitating PPA uptake. Respondents also frequently referred to the interaction between PPAs and public support schemes (e.g. two-way contracts for difference). In this context, they raised issues such as the influence of support schemes in PPA markets and the need to consider how PPAs can be effectively coordinated with such schemes.

Feedback received underlined that policies that promote the use of PPAs should also support their integration with flexibility solutions. Several contributions highlighted the need to address regulatory and administrative barriers for hybrid installations, in particular enabling the transfer of guarantees of origin for electricity provided by storage units. Grid capacity constraints and lengthy and complex permitting procedures were also repeatedly identified as major barriers for the development of the PPA market.

A significant number of contributors considered that accounting rules, particularly in relation to financial PPAs, may affect the wider use of PPAs, as their risk-management function is not always fully captured by current accounting treatments.

Several stakeholders raised the role of PPAs in carbon footprint methodologies in EU regulations and the potential implications of changes in this area.

Contributors consistently described national fragmentation as a core barrier to PPAs, especially to the development of cross-border PPAs. According to these submissions, differences in support scheme design, taxation, permitting and other regulatory practices make it difficult to structure PPAs that span multiple Member States.

Standardisation of PPA contracts was another topic frequently mentioned. While high transaction costs were viewed as a barrier to PPA market development, many respondents stressed that the value of PPAs often lies in their ability to be tailored to specific needs, which may limit the scope for full standardisation. It was often underlined that any standard contracts or market platforms should remain voluntary, and that Member States could usefully focus on awareness-raising, capacity-building and improving access to PPAs for smaller market participants, including SMEs.