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Consultation on the draft new State aid Framework to support the Clean Industrial Deal (Clean Industrial Deal State Aid Framework – CISAF)

Fields marked with * are mandatory.

Introduction

Following the adoption of the Clean Industrial Deal Communication on 26 February 2025, the Commission is consulting the general public on a draft new State aid framework.

The Commission invites you to provide your views on the draft Clean Industrial Deal State Aid Framework via the form below. The Commission is particularly interested in views on those parts marked in [ ]. In case you consider any such parts not appropriate in their current form and want to propose alternatives, please ensure to submit relevant data and evidence to substantiate your view.

Thank you for your collaboration!

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* Please provide your full name

Annette Jantzen

* Please provide your e-mail address (this will not be published)

annette.jantzen@eugine.eu

Please provide the name of the organisation or company you represent (if any)

EUGINE – European Engine Power Plants Association

Please indicate the size of your organisation

- [x] Micro (1 to 9 employees)
- [ ] Small (10 to 49 employees)
- [ ] Medium (50 to 249 employees)
- [ ] Large (250 or more employees)

If your organisation is registered, please provide your transparency register number

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General comments

Please provide any comments you may wish to bring to the Commission's attention in relation to the draft proposal for a new Clean Industrial Deal State aid Framework.

5000 character(s) maximum

- EUGINE, the association representing manufacturers of engine power plants, welcomes the ambition of the European Commission to enhance the competitiveness of European companies by simplifying regulation and reducing energy costs. We therefore regret that the current draft state aid framework does not seem to follow this initial aim, and instead seeks to establish a very detailed list of rules, which, in some cases, does not leave enough leeway to Member States in implementing these ambitions.
- We particularly regret the reference to and extension of scope of several pieces of legislation that have been recognised to be excessively complex and which should be reviewed soon – notably the renewable hydrogen delegated acts and the EU taxonomy delegated acts.
  - o The RFNBO DA has been amply criticised for hindering the development of renewable hydrogen and hydrogen derivatives (NH3, e-MeOH,e-Methan) and should therefore not be taken as a model for a wider application beyond renewable hydrogen production (for example, in the new definition of “fully renewable electricity”). Furthermore, the requested “additionality” and the requirement of “same time” and “same area” in first delegated act is unnecessarily harming cost efficiency and ramp up of these fuels. In its communication on the Clean Industrial Deal, the European Commission indicated its intention to launch a study to assess the effectiveness of the hydrogen framework, identify possible barriers to the upscaling of renewable hydrogen and review the delegated act on renewable fuels of non-biological origin. In this context, and in the interest of regulatory certainty, this DA should not be linked to requirements in this framework beyond its first application, ie, differentiate renewable hydrogen from other forms of hydrogen.
  - o Similarly, the Commission has recently recognised the complexity of the EU taxonomy. While its initial intention to drive investments in sustainable sectors is laudable, we deeply regret that, with time, its application has been extended way beyond its initial use case. General references to the “do no significant harm principle” should therefore be avoided, as they are both too general and difficult to implement in practice.
- Lastly, we would like to underline that European manufacturers have invested heavily in making engine power plants ready for hydrogen operation. Hydrogen power can be a cost-effective way to balance renewables over different timeframes. Member States that wish to do so should therefore be free to grant support to hydrogen power through different mechanisms and measures. Regulatory or other limitations to this national capacity, coupled to excessively complex rules related to the production of renewable and low-carbon hydrogen threaten Europe’s energy independence, resilience and, ultimately, competitiveness.

Aid to accelerate the rollout of renewable energy

Please provide any comments specific to section 4.1 of the draft framework (“Aid schemes to accelerate the rollout of renewable energy”).

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- On (32a): the exclusion of support for investment aid for H2 / RNFBOor H2 Ready power plants is not acceptable and would limit the progress in decarbonising the energy sector and maintaining Security of Supply. The reasoning behind this exclusion is so far not clear to us. It should be underlined that, initially, hydrogen power will be more expensive due to the high cost of renewable and low-carbon hydrogen. However, the low load factor of these plants also makes the initial investment less attractive than conventional power. Member States must be allowed to determine the best way to finance those plants, be it though supporting investment and/or operating costs.
- On (32) and (33): We note a two-sided approach to investment aid in storage. While aid to electricity storage and thermal storage can be granted with little conditions, the criteria for investments in storage of renewable gases and fuels require that at least 75% of the gas or fuel stored comes from a “directly connected” production facility. This oversees the fact that imported renewable gases like green or low carbon hydrogen need storage as well. In the near future, there will be a need for larger storage facilities of renewable fuels e.g. hydrogen caverns. It is not economically reasonable to create a lot of small storage facilities at each electrolyser compared to some larger storage (caverns). This is why we think that the “directly connected” requirement needs to be removed.

- On (39): We strongly advise against extending the general principles of the taxonomy to areas related to Member States’ competencies. On the other hand, requesting Member States to measure the planned support against the very specific, complex and unrealistic criteria in the taxonomy delegated act is an unnecessary regulatory burden.

- On (40): It should be noted that a storage solution is defined by a number of key parameters e.g loading and exporting energy power and size. It is therefore not understandable that the aid amount shall be “independent for the energy output”.

If you consider the proposed completion deadlines or exemptions therefrom (see point (37)) are not appropriate, please provide concrete justification for any alternative timeline or other exemptions you would consider more appropriate.

For what concerns the equipment our manufacturers produce, our members have indicated that 36 months is possible in many instances but in some cases can be difficult to achieve. We would ideally wish that such requirements be left to Member States to define based on the technology and specific market situation.

Please provide any comments specific to section 4.2 of the draft framework (“Aid for non-fossil flexibility support schemes”).

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- As a general comment, we would like to point out that “non-fossil” is so far not defined in EU legislation or this framework. While it should also include flexibility provided by renewable gases, we observe that understand it to be exclusively batteries and/or demand response (see France and Italy). We would therefore very much welcome a very clear indication that these schemes should be technology neutral and open to all resources that can provide flexibility without leading to excessive emissions.
- We particularly regret that, in its current form, the text neglects sector-coupled technologies such as CHP that are crucial for balancing decentralised renewable-based systems or PPA electricity. In that regard, we welcome the specifications in paragraph 53 but would request that renewable gas and hydrogen power is explicitly included in the list of technologies to be potentially considered for support in those schemes.
- On (57): This paragraph is similar to Requirement 21 under the “target model” for CRMs. To ensure coherence, that same text should be reproduced here too.
- On (58): We would like to point out that it is not always cost-efficient to balance different policy criteria in one and the same measure – i.e., security of supply and decarbonisation.
- On (61): 10 years is rather a short period, especially for more CAPEX-intensive projects. Shorter contract times automatically increase the cost that needs to be recovered by consumers. The specific contract length should be defined in the auction by the member state depending on the needs.
- On (63): The availability checks and penalties align non-fossil flexibility support with CRMs and are therefore a welcome requirement. We would nevertheless like to underline that this requirement shall consider declared outages of the facility.
- On (65) - footnote 40: The footnote specifies that “‘promotes’ means giving a competitive advantage to non-fossil flexibilities in capacity mechanism auctions (e.g. minimum level of non-fossil flexibility awarded a contract in a capacity mechanism)”. It is not clear why a requirement regarding CRM design is inserted as a footnote in this section. Generally speaking, introducing a competitive advantage without any clear basis goes against the design principes of CRMs.
- On (66): A stable grid benefits all customers connected to it. Putting the cost burden on consumers is problematic in cases where no smart meters are available. Regarding locational criteria, we wonder whether it is correct to have consumers in one part of the grid pay for grid planning and investment shortcomes.
- On (67): Five years is a rather short period and does not contribute to a stable regulatory framework. We would welcome a longer period of at least 10 years.

Please provide any comments specific to section 4.3 and Annex I of the draft framework (“Aid for capacity mechanisms following a target model”).

5000 character(s) maximum

- As a general comment, we welcome this “target model” leading to an easier approval of CRMs, even if we would have wished for longer (re)approval periods to increase regulatory certainty.

Annex I

- Req. 1:
  - While increased harmonisation of de-rating factors is welcome, it should be noted that CONE is very dependent on the national context. Costs can vary significantly between EU countries, and therefore CONE should not be harmonised.
  - In that same vein, taking only ERAA as basis may not leave enough room for national and even local /zonal specificities. It does also not properly capture various “non-average“ weather events.
  - Lastly, it is not clear to us how the planned review of the ERAA methodology will influence the application timelines of this requirement. In any case, the application of this simplified approval process should not be delayed by the review of the ERAA methodology.
- Req. 5: We welcome the minimum participation threshold of 1MW.
- Req. 6: While it is technically feasible to decarbonise natural gas power, the economic, regulatory and market conditions are not there for natural gas power plants to decarbonise. Specifically, there is a need to specify that Member States can accumulate CRMs with OPEX support for higher fuel costs.
- Req. 7 : Individual de-rating factors that deviate from the standard must be duly justified. Penalties that intervene only ex post are not enough to limit possible abuses of this “custom” de-rating factor.
- Req. 9: The reasoning behind this requirement is not fully clear to us. The demand should be the volume auctioned to meet the reliability standard. CONE means both fixed and variable cost of new entry and takes into account estimated capital costs and annual fixed costs and WACC. The CONE should equal the VoLL multiplied by the Loss of Load Expectation or LOLE. It is not clear why it should be reduced if prices exceed CONE as it would mean, as we understand it, that the reliability standard would not be reached?
- Req. 10: It is not fully clear to us why specifically Y-4/Y-6 auctions are mentioned here and not, say Y-3 and Y-5. It is also unclear to us how this requirement links to the 36-month lead time in paragraph 32. Lastly, Member States should be free to adjust for any relevant technical or commercial reason linked to any kind of generation capacity (not just demand response and storage).
- Req. 16: The average economic lifetime of infrastructure assets is +20 years. Longer contract periods would therefore reduce the cost that needs to be recovered from consumers on a yearly basis.
- Req. 18: The test should not happen in the period of declared unavailability.
- Req. 20: The possibility to offer AS outside of delivery window is good but should not become an obligation as this would unnecessarily increase the cost of the facility.
- Footnote 9: Different technologies are capable of providing different services in addition to active power. In some cases, technical trade-offs exist and need to be taken into account.
- Req. 21: Not all technologies meet the same needs, which may sometimes make joint procurement difficult.
- Footnote 10: We welcome this approach.
- Req. 23: We understand that hydrogen power can potentially be funded under capacity mechanisms. It should be noted that the high cost of renewable and low-carbon hydrogen might require that some additional support is provided (ie cumulated with capacity payments). It would be helpful that this be made explicit in the text, eg: “Req. 23: Aid to the same capacity resource from more than one aid measure, for example for the decarbonisation of gas power, can be cumulated so long as overcompensation is avoided.”
- Req 24&25 : If not designed correctly, this penalises consumers that cannot be flexible and oversees that fact that all consumers benefit from a secure supply. In our view, the way to recover the costs should be left to Member States.
- Req. 28:
  - It should be noted that there is a definition of “availability” in the ACER Technical specifications on cross-border participation: ‘availability’ means the readiness of the CMU contracted in the CM.
  - It is also not clear what exactly is referred to with “short-term electricity markets” (there are several). This requirement may lead to capacities feeling obliged to bid on intra-day markets and lead to technical and economic inefficiencies.
  - The exact application of this definition beyond availability checks should be clarified.

Aid to deploy industrial decarbonisation

Please provide any comments specific to section 5 of the draft framework ("Aid to deploy industrial decarbonisation").

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- As a general note, we would insist that, at least for a transitional period, natural gas-based projects should continue to be eligible for funding, until renewable/bio-based fuels or CCS become competitive.
- In addition, we deeply regret that para. 75(b) seems to exclude electricity-only installations using renewable hydrogen. Such installations can be useful to balance renewables on-site and in PPAs. What is more, such plants can start running on natural gas and then switch to hydrogen once it becomes available.
- On (73): Our reading is that this is a way to incentivise cogeneration. In such a case, the available waste heat needs to be considered. Without that, the 30% and 60% target is difficult to meet.
- On (75c): These requirements are too stringent, do not allow to build synergies in industrial ecosystems and are not adapted to the realities on the ground. Point (ii) does not support the ambition to build up district heating networks, which could use available waste heat from nearby facilities.
- On (79): For what concerns the equipment our manufacturers produce, our members have indicated that 36 months is possible in many instances but in some cases can be difficult to achieve. We would ideally wish that such requirements be left to Member States to define based on the technology and specific market situation.
- On (83): This will probably make investments in CCUS linked to power generation even more complex.
- On (96): This is globally positive, but make the limitations to CHP investments or biomass-based heat are even more difficult to understand.

If you consider that the prioritisation of technologies for decarbonisation of industrial heat in this section on decarbonisation and energy efficiency is not appropriate (see point (73)), please explain and provide evidence for other criteria you would consider more appropriate.

- Biomass-based renewable heat should be treated an equal footing with flexible direct electrification and the reuse of waste-heat, especially when biomass is available on-site or nearby.
- Combined-heat-and-power using biomass and biogas / biomethane have proven to provide both environmental and cost-effective low- and high-temperature heat to a wide range of sectors and should continue to be supported.

For aid schemes covering investments relying wholly or partly on the use of hydrogen, section 5, point (82), the new framework takes into account the fact that Article 22a of Directive (EU) 2018/2001 on the promotion of the use of energy from renewable sources (RED) establishes targets for renewable fuels of non-biological origin (RFNBO) for hydrogen in industry. The draft framework does so by laying down a minimum share of renewable hydrogen calculated by reference to the average share of electricity from renewable sources in the Member State concerned, as such project-level contribution to meeting national targets established by EU law is considered a positive effect in the balancing exercise under Article 107(3)(c) TFEU. If you consider that the scope for aid for investments for industrial use of hydrogen should be defined differently, please provide justification and any available evidence for the scope of projects for which you consider that State aid for other types or combinations of hydrogen is required.

Considering that the renewable and low-carbon hydrogen sectors are just starting to develop, we think it to be premature and unnecessary to set any additional requirements beyond what is set in the existing and upcoming delegated acts. Engine and turbine-based power plants are ready to run on hydrogen, but this is so far hindered by an unclear business model and excessive EU regulations.

If you consider that the zero indirect emissions presumption for electrification projects in this section on decarbonisation and energy efficiency is not appropriate (see point (98)), please explain and provide evidence for an alternative presumption you would consider more appropriate.

In our view, the conditions in 98 will be difficult to meet and implement.

If you consider that the safe harbour for natural gas based projects in this section on decarbonisation and energy efficiency is not appropriate (see point (101)), please explain and provide evidence for an alternative presumption you would consider more appropriate.

- Regarding point a), we underline that it is today difficult to foresee what the cost of a retrofit will be in 8 years considering R&D and also the lack of rules on hydrogen power. Cost-considerations should therefore be left to the investor.
- Regarding point b) the conditions in point 82 are too complex, especially taking into account the already very high complexity of the delegated acts and their upcoming review.

The draft framework allows to provide support for investment costs related directly to the achievement of the greenhouse gas emission savings or energy efficiency. Such support for these investment costs does not cover production capacity increases, but it also does not prevent companies from proceeding at the same time with capacity increases insofar as the increases are not financed by State aid under the decarbonisation section. This is without prejudice to the compatibility of aid for such capacity increases under other sections of the framework, other frameworks or the Treaty. For simplification reasons, the draft framework nevertheless allows increases of capacity up to 5% without having to differentiate between costs for decarbonisation and those related to capacity increases (see point (103)). Do you think the 5% flexibility margin proposed to be appropriate? If not, please substantiate your view with concrete evidence and data.

Aid to ensure sufficient manufacturing capacity in clean technologies

Please provide any comments specific to section 6 of the draft framework ("Aid to ensure sufficient manufacturing capacity in clean technologies").

5000 character(s) maximum

Paragraph 122 points to the technologies listed as net-zero in the NZIA and its delegated and implementing acts. Unfortunately, the NZIA and linked lists limit net-zero technologies and components to a few selected solutions.

Thus, under “hydrogen technologies”, fuel cells are listed while hydrogen engines are not. Both are hydrogen technologies, using hydrogen to generate electricity and heat. It is not compatible with a transparent and technology-open approach to pre-select some solutions while ignoring others.

In the same way, biogas, biomethane, sewage and landfill gas are all transformed to valuable dispatchable electricity and heat by using biogas engines and the connected generators. There seems to be no obvious reason why eg anaerobic digesters or landfill gas technologies are listed, but not the matching biogas engines.

The list of clean technologies in point (122) eligible for manufacturing aid should be defined by reference to identifiable market failures in ensuring resilient supply of such technologies. Please indicate whether you consider that the scope for aid for clean tech manufacturing equipment and components activities under section 6 should be aligned with the scope of the corresponding section of the Temporary Crisis and Transition Framework (as set out in the draft for consultation of stakeholder views), with the scope of the Annex of the Net Zero Industry Act, or with some other sub-set of such technologies. Please provide justification and any available evidence for the scope of projects for which you consider that State aid for additional manufacturing capacity is required.

Engines using hydrogen and its derivatives have the same applications as fuel cells, are a more mature technology and can be operated more flexibly. European companies are globally leading technology developers and manufacturers of hydrogen(ready) engines. Hydrogen engines will be decisive in providing electricity and heat in times of low variable renewables supply and high demand. The value of such hydrogen engines is recognised by countries like Germany that foresee an important role for hydrogen engines in ensuring reliability in their electricity system. Demonstrations with using hydrogen engine based CHP for seasonal storage of green electricity can already be found in EU countries such as Austria.

Biogas & biomethane engines are the core elements of any sustainable biogas or biomethane plant. They transform the renewable gas into reliable dispatchable electricity and heat. Most of these engines are operation in cogeneration mode, having an extremely high efficiency. They provide an essential complement to other renewable technologies as they are capable of generating electricity and heat under all weather conditions and therefore are able to provide flexibility to the electricity and heat grid.

Landfill and sewage gases are used in connection with biogas engines to generate reliable dispatchable electricity and heat. Most of these engines are operating in cogeneration mode, having an extremely high efficiency. They provide an essential complement to other renewable technologies as they are capable of generating electricity and heat under alle weather conditions and therefore are able to provide flexibility to the electricity and heat grid.

These products can be differentiated from engines operating with natural gas and has a modified design and uses partially different sub-components. They are in most cases using a customised design for the mentioned technology and are provided by a European industry competing globally.
Furthermore, engines running on biogas can be used to add a carbon capture unit and produce biogenic CO2, a highly valuable raw material for SAF’s and other sustainable fuels.

Aid to reduce risks of private investments

Please provide any comments specific to section 7 of the draft framework ("Aid to reduce risks of private investments in renewable energy, industrial decarbonisation, clean technology manufacturing and energy infrastructure").

5000 character(s) maximum

Do you agree that the inclusion of aid to investors in energy infrastructure projects as foreseen in point (146) is necessary?

- Yes
- No
- I don't know

Thank you!

Your contribution is highly welcome. Thank you very much for sharing your views!

If you want to provide additional evidence to support your replies above, please upload here.

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