Position Paper

Europex Response to the Commission's Call for Evidence Setting a Renewable Energy Framework for the Decade Ahead:

Brussels, 15 April 2026

Europex welcomes the opportunity to respond to the Commission's call for evidence to set a renewable energy framework for the decade ahead. We are firmly committed to sustainability and fully support the continued development of the energy sector. To this end, we have provided our views on different policy elements.

1. Market Integration and Price Signals

Deeper market integration is one of the key tools to ensure that the European energy system delivers economically optimal results. Increasing cross-border capacity, as well as using the existing one effectively, further facilitates electricity to flow from where it is cheapest to produce to where it is most needed, boosting efficiency, magnifying overall welfare and increasing the resilience of the system.

Transparent price signals are another key factor in maintaining cost efficiency when deploying renewable energy sources (RES). Indeed, transparent prices ensure that renewable energy is deployed in a cost-efficient way, accurately representing the economic benefits of the different technologies. In this sense, technology neutrality must be maintained when designing policies, allowing for technologies to be chosen in light of their cost efficiency and system benefits. This price discovery is provided by energy exchanges and rests upon supply and demand-based price formation.

2. Market Participation and Remuneration of Renewables

Renewables should be integrated in the established wholesale markets and participate under the same conditions as other generation assets. Technological neutrality in this respect is an imperative. This ensures they remain responsive to market signals, which will in turn support investment in flexibility and help align generation with the needs of the grid and the wider system. Mature renewable technologies should completely rely on market-based remuneration systems to optimise output, the location of new projects and responsiveness to prices, which in turn will lead to complementary technologies like

storage and other flexibility solutions being developed in the most cost-efficient manner, providing the most value. Emerging technologies should only benefit from targeted regulatory incentives that avoid market distortions and are limited in their duration.

3. Policy Framework and Investment Certainty

This all requires a stable policy framework, essential for investors, providing certainty that translates into project bankability and reducing transaction costs derived from uncertainty. Market distorting interventions reduce the effectiveness of price signals, reducing the cost efficiency of technology deployment. Market integration and reduced distortions lead to lower burdens for end-customers; efficient price formation and lower subsidy dependence of projects benefit consumers directly.

4. Renewable Fuels and Post-2030 Framework

With regard to renewable fuels needed in hard-to-abate sectors, the future post-2030 framework should ensure that environmental credibility and practical workability go hand in hand. Unnecessarily rigid or overly complex requirements may slow market uptake and reduce the attractiveness of renewable fuels in sectors where decarbonisation options remain limited. The post-2030 framework should therefore create conditions that support scale-up and cost reduction, while preserving confidence in the environmental integrity of these fuels.

5. Guarantees of Origin

Europex considers Guarantees of Origin (GOs) to be a key element of the post-2030 renewable energy framework, as they provide a reliable and market-based means to certify the origin and characteristics of energy and thereby strengthen transparency and consumer trust. As renewable electricity, renewable and low-carbon gases, and heating and cooling play an increasing role in the decarbonisation of the European economy, the future framework should ensure that the GOs system is robust, harmonised and based on common European standards and infrastructure. This ensures that certificates can be transferred across Member States and used in an efficient, transparent, and liquid market.

In our view, the revision should mandate GOs as the exclusive tool for full disclosure of all energy sources. This would improve transparency for consumers and reduce fragmentation created by divergent national approaches. More broadly, the future framework should support the further standardisation and tradability of GOs, cover all production sources, provide legal clarity through a single disclosure regime, and ensure that the system remains technology-neutral and cross-sectorally compatible. This will be essential not only to preserve confidence in the integrity of environmental markets but also to incentivise the take-up of renewable energy and contribute to achieving renewable energy targets at the least cost.

6. Conclusion

We remain fully committed to engaging in the forthcoming, more detailed consultation process and stand ready to contribute our expertise constructively to the co-design of a robust and forward-looking framework for renewable energy sources beyond 2030.

About

Europex is a not-for-profit association of European energy exchanges with 36 members. It represents the interests of exchange-based wholesale electricity, gas and environmental markets, focuses on developments of the European regulatory framework for wholesale energy trading and provides a discussion platform at European level.

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