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12/04/2022

## **Finnish Energy's statement on EU's Solar Energy Strategy**

Finnish Energy finds it important to identify barriers and find best practices to accelerate solar energy deployment in EU as part of the energy transition and improving EU's energy self-sufficiency.

In general, solar energy has broad public acceptance in Finland. From Finnish perspective one of the main barriers for solar energy deployment is geographical. Possible competition disadvantages for solar is due to differences in technologies and Finnish solar potential and winter conditions, not markets.

Best ways to boost new utility grid solar energy (PV) projects are with voluntary measures, not with binding targets or at the expense of technology neutrality. Regulatory frameworks for all low-carbon technologies needs to be predictable and possible financial support directed only to R&D and pilots. Harmonising and accelerating national permitting procedures in Finland would benefit also solar energy projects.

For the distributed, small-scale solar production installations in single-unit or multi-unit buildings main negative factors for customers are doubts of economic benefits and lack of reliable and impartial information, as well as Finnish solar potential. Permitting is made easier but needs harmonizing especially within different municipalities. It is already possible to have financial support for households and residential buildings. Also, energy communities are possible, and for them the main barrier is lack of information and knowledge and slowness as well as other difficulties in community's internal decision-making.

Solar thermal faces unfavourable conditions in Finland as it is not available when most needed due to winter conditions. Solar thermal collectors are more challenging to design, install and operate than PVs. Solar thermal also requires big capacitors, and these investments reduce profitability. It's also worth to mention that solar thermal would replace mainly other low-carbon production in Finland.

Member States should have the right to choose the most effective means for achieving carbon neutrality targets while considering each country's starting point, potential and, in particular, cost-effectiveness. Certain minimum bid sizes and other rules in the wholesale market are justified. As a result, smaller resources participate in the wholesale market aggregated. This has been adequately addressed in the Clean Energy Package, no new European regulation is needed.

Finnish Energy would like to point out that all possible proposed measures within solar energy strategy need to be in line with existing measures and regulation.

Yours sincerely,

FINNISH ENERGY

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