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# UFE's reply to the EC call for evidence on the Renewable energy legal framework after 2030

The Union of French Electricity (UFE) supports the development of a post-2030 EU climate and energy framework that is outcome-oriented, cost-effective, investment-friendly and system-consistent. It should prioritise the achievement of overall decarbonisation objectives through a systemic approach, rather than rely on siloed technology-specific targets. Electrification of end uses, supported by low-carbon electricity (RES and nuclear), should be recognised as the main driver of the EU's energy transition.

The future framework should preserve MS's flexibility and freedom regarding their low-carbon electricity mix. **The current design of the RED Directive, based on binding and top-down approach with predefined allocation mechanisms is not fit for purpose for the decade ahead. The post-2030 framework should therefore evolve towards a more system-based and demand-driven architecture**, in which RES play a key role, but integrated in delivering decarbonisation in the most cost-effective way.

## Electrification as a cornerstone of decarbonisation

The limitations of the current EU-level binding RES targets highlight the need for a new approach. For the decade ahead, the priority should be given to demand-side measures, with the introduction of a binding electrification target and the transition towards low-carbon energy sources.

Electrification represents one of the most cost-effective and resource-efficient pathways to achieve deep decarbonisation across sectors, while reinforcing EU energy security and autonomy. A stronger and more explicit focus on electrification is required to drive MS' low carbon transition.

UFE recommends the EU to set up:

- a binding electrification target alongside
- a low-carbon energy target.

MS would then translate this electrification target in their NECPs by sectors. This **dual objective, combining electrification with low-carbon energy penetration, primarily driven by decarbonised electricity**, is essential to:

- Avoid carbon leakage between sectors
- Ensure environmental integrity of electrification pathways
- Maintain credibility of EU climate objectives

## Role of renewable energy within the decarbonisation objective

Within this system-based approach, renewable energy remains a key contributor to the decarbonisation objective. However, **UFE considers that RES should no longer be treated as a standalone binding target in itself but rather as a KPI within a broader decarbonisation framework**.
Renewable electricity plays a central role in enabling electrification pathways and supporting emissions reductions across the economy. UFE therefore supports a non-binding EU-level renewable energy KPI embedded within the broader decarbonisation objective, combined with:

- No predefined allocation key across Member States
- A negotiation-based approach between MS to ensure collective delivery, supported by EU-level monitoring.

RES deployment should be a part of a comprehensive and standardised set of common KPIs to ensure coherent, comparable and easily accessible monitoring of progress across all MS.

## Monitoring and system consistency at EU level

To strengthen transparency and system consistency, UFE proposes the development of indicative EU-level reference pathways, based on the aggregation of NECPs, in order to assess whether their combined effect is sufficient to meet the EU's decarbonisation objective. These pathways would:

- Reflect the projected level of decarbonisation resulting from MS' planned policies and investments
- Be assessed against the EU's overall climate targets
- Identify any remaining gap to achieve the EU decarbonisation objective

This gap would provide a system-level indication of the additional low-carbon electricity required to meet electrification needs, **with renewable electricity expected to play a central role in bridging this gap, as the main driver of electrification**.

The post-2030 energy framework should focus on reaching the overall decarbonisation targets, with no indirect mechanisms leading to de facto harmonisation (allocation keys, prescriptive methodologies, overly detailed indicators leading to implicit technological convergence).