

life comet
Energy communities working together

Set of policy recommendations and 4 position statements

lifecomet.rescoop.eu

LIFE- COMET Project has received funding from the European Commission's LIFE programme, under the grant agreement No. 101120519

Executive summary

The Life COMET project is an innovative initiative aimed at transforming the community energy landscape in Central and Eastern Europe. Concretely, the project aims to perform a comprehensive and holistic assessment and experience sharing of best practices in the region, as well as efforts to achieve a shift towards the desired transformation of the enabling frameworks.

A key outcome of LIFE COMET is a set of policy recommendations aimed at strengthening the enabling environment for energy communities. Presented in this document and summarised below, these recommendations should be considered alongside the European Commission Recommendation on supporting the development of energy communities and maximising the potential of self-consumption, C(2026) 2850 of 30 April 2026, and its accompanying Staff Working Document, SWD(2026) 126. Together, these recommendations reinforce the growing policy consensus on the importance of energy communities for delivering Europe's clean, competitive, and socially inclusive energy transition.

Addressing the persistent barriers facing energy communities in Central and Eastern Europe requires coordinated and ambitious policy action. Priority should be given to establishing robust enabling frameworks that formally recognise energy communities in national legislation, supported by clear legal definitions, streamlined registration procedures, and effective implementation mechanisms. Regulatory frameworks should ensure that energy communities can participate fully in the energy arena, including through energy sharing. Where secondary legislation remains incomplete, governments should accelerate its adoption without delay.

Targeted financial support is equally essential. Member States should develop dedicated financing instruments tailored to the specific characteristics of energy communities, covering the entire project cycle from concept development and start-up funding to concessional loans, guarantees, and fiscal incentives. Particular attention should be given to ensuring the participation of vulnerable households through targeted subsidies and public support schemes, ensuring that the benefits of the energy transition are shared broadly and equitably. Under a constrained public fiscal context, it is worth noting that energy communities have significant potential to leverage private capital, as well as alleviate the cost-of-living crisis.

Strengthening the framework for energy sharing can further improve the economic viability of community energy projects. A gradual move from net metering to transparent and fair net billing, combined with incentives for local consumption, storage deployment, flexibility provision, and reduced grid charges, can create stable investment conditions and improve project bankability. Equally important are fair and timely grid access, as well as simplified permitting procedures, to ensure that community initiatives can compete on an equal footing with larger market actors.

Finally, further development of the community energy sector depends on strong institutional backing and long-term political commitment. National strategies should support collaboration among energy communities, local authorities, and other stakeholders, while promoting inclusive governance and citizen participation. One-stop shops, targeted capacity-building programmes, and dedicated technical assistance can help scale up community-led projects and position energy communities as a key

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instrument for enhancing energy security, strengthening social cohesion, and delivering a resilient and democratic energy transition.

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List of abbreviations

Abbreviation	Meaning
AI	Artificial Intelligence
ANRE	National Energy Regulatory Authority (Romania)
ASBL	Association Sans But Lucratif (non-profit association)
BE	Belgium
C4T	Cohesion for Transitions
CBOS	Public Opinion Research Center (Poland)
CCEAH	Community Energy Advisory Hub
CdE	Cooperativadeenergie.ro
CEAH	Community Energy Advisory Hub
CEC	Citizen Energy Community
CEE	Central and Eastern Europe
CET	Clean Energy Transition
CINEA	European Climate, Infrastructure and Environment Executive Agency
COMET	Coalitions for Community Energy Catalysation in Eastern EU
CTH	CoopTechHub
DESMI	Greek National Energy Communities Association
DG ENER	Directorate-General for Energy
DG REGIO	Directorate-General for Regional and Urban Policy
DSO	Distribution System Operator
DSOs	Distribution System Operators
ECF	European Competitiveness Fund
EE	Estonia
ELE	Electra Energy Cooperative

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ENERCOM	Energy Communities Facility
EPAH	Energy Poverty Advisory Hub
ERDF	European Regional Development Fund
ES	Energy Sharing / Energetske Skupnosti (in cited Slovenian source abbreviation)
EU	European Union
EV	Electric Vehicle
FOC	Focus, Association for Sustainable Development (Slovenia)
GW	Gigawatt
GR	Greece
H&C	Heating and Cooling
HR	Croatia
HU	Hungary
IEMD	Internal Electricity Market Directive
IT	Italy
KPO	National Recovery and Resilience Plan (Poland)
kWh	Kilowatt-hour
kWp	Kilowatt-peak
LIFE	EU Programme for Environment and Climate Action
NECP	National Energy and Climate Plan
NGO	Non-Governmental Organisation
NRPP	National and Regional Partnership Plan
PL	Poland
PLZ	PLZ Spółdzielnia
PPA	Power Purchase Agreement
PT	Portugal
PV	Photovoltaic

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REC	Renewable Energy Community
RED / RED II	Renewable Energy Directive (Recast)
RES	Renewable Energy Sources
RESC	REScoop EU
REScoop	Renewable Energy Sources Cooperative
RRF	Recovery and Resilience Facility
RO	Romania
SEC	Solidarity Economy Center
SERC	National Federation of Energy Cooperatives (Poland)
SI	Slovenia
SRIA	Strategic Research and Innovation Agenda
SWD	Staff Working Document
TT	Tallinn University of Technology (Tallinna Tehnikaülikool)
VAT	Value Added Tax
VNB	Virtual Net Billing
WP	Work Package
ZEZ	Zelena Energetska Zadruga (Green Energy Cooperative)

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1. Introduction

The present policy recommendations document presents the main policy lessons and recommendations emerging from the LIFE COMET project's assessment of energy community development in seven Central and Eastern European countries. The document aims to support policymakers, regulators, local authorities, and EU institutions in creating more enabling frameworks for energy communities by providing targeted policy recommendations, showcasing good practice examples, and setting out the LIFE COMET consortium's positions on key issues such as community energy coalitions, financing, energy sharing, and the inclusion of vulnerable households in energy communities.

The document is structured to move from evidence to action. It first presents the state of energy communities and key barriers identified through the LIFE COMET analysis in seven Central and Eastern European countries, then outlines policy recommendations, highlights four illustrative good practices, and concludes with four position statements on issues where the project has developed particularly strong expertise and consensus.

The policy recommendations are practical actions addressed primarily to national and regional policymakers, regulators, public authorities, and EU institutions to improve enabling frameworks for energy communities. The position statements go a step further: they present the LIFE COMET consortium's strategic position and rationale on key topics, supported by project evidence and experiences.

The four good practices are intended to showcase how LIFE COMET's policy recommendations can be turned into successful practices so that policymakers, regulators, funding bodies, and local authorities can be inspired by examples of successful policy and support measures that could be adapted and replicated in other countries and regions.

It is important to stress that this document is grounded in the experience, evidence, and collaborative work of the LIFE COMET partners across seven Central and Eastern European countries. It builds on the project's activities, such as maturity assessments, national analyses, stakeholder engagement activities, coalition-building efforts, and practical insights gained from supporting energy community development. The recommendations, position statements, and examples presented reflect both the findings of the project and the partners' direct experience in addressing barriers and enabling conditions for community energy in diverse national contexts.

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1. Energy communities in 7 Central and Eastern European EU Member States

To present the backdrop against which LIFE COMET policy recommendations are set, this section provides the contexts of energy communities in the 7 Central- and Eastern-European member states that are covered by the work of LIFE COMET.

Life-COMET project activities were designed to accelerate the development of community energy in Eastern Europe by creating strong national community energy coalitions and strengthening the capacity of local actors. In Greece, Croatia, Romania, Hungary, Slovenia, Poland and Estonia, the project brought together key stakeholders to improve enabling policy and regulatory frameworks, develop national strategies and promote citizen ownership.

The project built the capacity of these coalitions through training, tools and knowledge exchange, while establishing national Community Energy Service Points to provide practical technical, legal and financial assistance to existing and emerging energy communities. By supporting peer learning, expert cooperation and the development of sustainable support mechanisms, LIFE-COMET aims to help energy communities overcome barriers and move from early-stage ideas to viable projects.

The project is also facilitating the replication of its coalitions, tools and approaches in other Eastern European countries, including Latvia, Lithuania, Czechia, Slovakia and Bulgaria, contributing to the wider uptake and long-term growth of community energy across the region.

In the initial stages of the project, LIFE COMET has implemented a maturity analysis of the energy communities in 7 Central and Eastern European EU Member States[1]. The maturity is evaluated using 11 assessment criteria that influence the development of energy communities. Each criterion is weighted according to its contribution to maturity: political will, regulatory framework, business models, financing, and collective self-consumption carry the highest weight; local, regional, and national strategies and networking have a medium weight; while the transposition process, knowledge, awareness raising, and stakeholder engagement receive the lowest weight. The final maturity score reflects the weighted performance across all criteria.

The overall maturity level of energy communities in the seven assessed countries is low, with most countries—Croatia, Estonia, Hungary, Poland, Romania, and Slovenia—classified at minimum maturity. Only Greece reaches moderate maturity. Minimum maturity reflects a context with only rudimentary strategic and regulatory support, poorly developed business models, limited financing options, weak networking structures, low stakeholder engagement, and limited public awareness

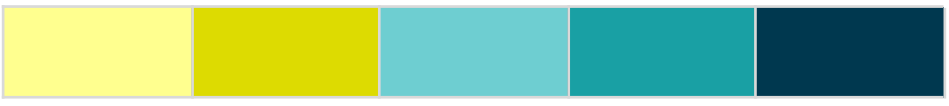
[1] https://lifecomet.rescoop.eu/resources/national-reports-on-status-for-energy-community-development

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of community energy. In contrast, Greece's moderate maturity level indicates partly developed frameworks, more functioning networks, and higher knowledge and awareness levels.

Table 1: Maturity level of energy communities in seven CEE countries

	Greece	Estonia	Slovenia	Poland	Romania	Croatia	Hungary
MATURITY LEVEL	**3**	**2**	**2**	**2**	**2**	**2**	**2**
Political Will & Engagement	2	3	2	3	2	2	2
Transposition Process	3	2	3	3	2	3	2
Local, Regional & National Strategies	2	3	1	2	2	2	2
Regulatory Framework	3	1	3	3	1	3	1
Business Models	3	2	2	1	2	2	2
Financing	3	1	4	2	1	2	2
Collective self-consumption, Energy saving & Efficiency	4	1	3	2	1	1	2
Networking	4	3	4	2	2	2	1
Knowledge	4	3	2	2	3	2	2
Awareness	2	1	2	2	2	1	2
Stakeholder Engagement	2	5	2	2	3	2	1

Lowest maturity level  Highest maturity level

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Source: National reports on Energy community development in Croatia, Estonia, Greece, Hungary, Poland, Romania, and Slovenia, available at https://lifecomet.rescoop.eu/resources/national-reports-on-status-for-energy-community-development

Across countries, common barriers include poor or incomplete transposition of EU directives, especially weak regulatory frameworks and a lack of clear procedures for establishing and operating energy communities. Financing is generally scarce, with only Slovenia offering broader access to different funding instruments. Business models remain limited, and measures supporting collective self-consumption and energy efficiency are often absent. Networking ranges from informal or emerging structures to a complete absence in some countries, while knowledge and awareness vary from low to moderate. Stakeholder engagement is typically minimal.

Overall, inadequate regulation, insufficient financing tailored to citizen-led initiatives, weak business models, and low stakeholder awareness collectively keep the maturity of energy communities at a relatively early development stage.

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2. Policy context – policy framework in 7 Central and Eastern European EU Member States

3.1. Common and persistent barriers for the development of energy communities

This section looks into the key barriers for the development of energy communities in the seven Central and Eastern European countries. The existing barriers are a basis for shaping the LIFE COMET policy recommendations in the next section[2].

The transposition of EU energy directives REDII and IEMD shapes national conditions for developing energy communities in the seven analysed countries. Although most have completed transposition[3], many only meet minimum EU requirements and show significant gaps. Romania and Slovenia incorporated the EU directives into national legislation with only limited adaptation to national contexts, resulting in a lack of clarity on several practical aspects of implementation, while several countries lack implementing regulations. Hungary and Poland merged REC and CEC concepts, creating restrictions and incorrect transposition. Croatia limits energy communities to non-profit forms, and Greece's legislation has created confusion due to overlapping definitions. Registration procedures are often burdensome, and enabling frameworks remain incomplete or absent, especially in Estonia and Poland.

The comparative assessment of national regulatory frameworks in the previous chapter shows that all analysed countries face regulatory gaps that constrain the development of energy communities; hence, there is a strong need for further regulation to fully enable energy community growth. Common problems include generic legal provisions lacking detailed implementing rules. In Poland, legislation is still not fully aligned with EU requirements, while in Greece regulatory barriers limit energy communities' activities mainly to energy production and self-consumption. Although some recent developments—such as recognising housing cooperatives as energy communities in Estonia, enabling collective self-consumption in Greek apartment buildings, and expanding community energy activities in Romania—are positive, they remain insufficient to close existing gaps.

[2] Section is based on https://lifecomet.rescoop.eu/resources/national-reports-on-status-for-energy-community-development
[3] REScoop.eu Transposition tracker: https://www.rescoop.eu/policy/transposition-tracker/

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3.2. Policy recommendations

To address the barriers to energy community development, listed above, LIFE COMET partners propose the policy recommendations below to tackle the policy shortcomings and barriers in the Central and Eastern European region. Several of these recommendations are also reflected in the European Commission's Recommendation on supporting the development of energy communities and maximising the potential of self-consumption, C(2026) 2850 of 30 April 2026, and its accompanying Staff Working Document, SWD(2026) 126, showing that experiences from the field work of LIFE COMET partners are reinforced by the guidance of the European Commission.

Adopt and/or improve the enabling frameworks for energy communities[4]: One of the first steps to creating or improving an enabling framework for energy communities is to make a clear legal definition and recognition of community energy. Clear definitions make it easier to design targeted incentives and ensure regulatory compliance without unnecessary administrative burdens. Another step is to create regulatory frameworks allowing communities to participate in local energy trading, peer-to-peer electricity sharing, energy aggregation programmes and flexibility and demand-response markets.

Develop secondary legislation to enable energy sharing: Member states that have not developed a legal framework for energy sharing should develop it promptly (see position statement on energy sharing on page).

Provide suitable and accessible financial incentives for energy communities: in line with Article 22 of the Renewable Energy Directive, Member States should adopt support schemes taking into account the specificities of energy communities (e.g., premium tariffs or feed-in tariffs, or bonus points in renewable auction criteria or contracts-for-difference specifically for community initiatives). Member States should design several funding instruments, targeting different stages of project development (from ideation to development and operation). This means that seed funding and grants for early-stage development of a community need to be provided, while low-interest loans or guarantees can be leveraged for project construction (e.g., through a revolving loan-to-grant scheme). Tax incentives for citizens investing in community projects should also be foreseen. The participation of vulnerable households in energy communities should be fully subsidised by the state (e.g., through grants and pre-financed shares) (see position statement on financing on page).

Improve the conditions for collective self-consumption: Transition gradually from traditional net-metering to net-billing schemes, ensuring that each kWh exported to the grid is compensated at a fair and transparent rate that reflects its true value. This should include differentiated tariffs that reward local consumption, support energy storage integration, and provide predictable,

[4] Energy Communities Repository: A roadmap - to developing a policy and legal framework that enables the development of energy communitieshttps://circabc.europa.eu/ui/group/8f5f9424-a7ef-4dbf-b914-1af1d12ff5d2/library/27392344-e8be-40f9-97ec-9d0a25ad4a42/details

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long-term revenue streams for participants. Net-billing periods should be regulated, ideally on intervals such as monthly, hourly or 15-minute periods, to encourage households and energy communities to align energy use with local production. Local, time-bound consumption should also be incentivised through reduced grid charges (e.g., as is happening in Austria).

Facilitate strategic networking between energy communities: Connecting energy communities can stimulate transfer of experiences and know-how, as well as give them a stronger voice in the energy arena. Especially important is to link the energy community movement with local authorities, responsible for creating energy communities. Local authorities can play a key enabling role by co-investing in community energy projects, facilitating local planning and zoning and providing technical support and data. Such collaboration maximizes local benefits and public trust (see position statement on coalitions on page).

Improve decision-making processes to be more inclusive for energy communities and citizen-led initiatives: Ideally, a continuous dialogue between energy communities, decision makers and other relevant stakeholders should be established, where it is lacking. At the EU level, the Commission can leverage the Energy Union Taskforce for regular updates regarding the implementation of the Citizens Energy Package.

Promote long-term political commitment: Community energy thrives in stable policy environments. Governments should set long-term targets for energy community development in national energy strategies, as well as integrate community energy into climate, social, urban planning and rural-development policies. To this end, a cross-sectoral coordination should be put into practice, ensuring coordination across sectors and ministries (energy, environment, spatial planning, finance, and regional development). In its recent special report on energy communities, the European Court of Auditors calls for legally binding, national targets for energy communities, operationalised and monitored through the (upcoming) revision of the Governance Regulation.[5]

Adopt measures to include vulnerable households and households affected by energy poverty in energy communities: Co-design measures that stimulate inclusion of the most vulnerable parts of the population into energy communities. It's worth noting that the European Court of Auditors' report on energy communities calls for stronger measures to ensure the inclusion of citizens, and particularly vulnerable households, in energy communities[6] (see position statement on energy poverty on page).

Create one-stop shops: To inform, simplify and support the creation of energy communities and the implementation of their projects, one-stop shops can play an enabling role. Ideally, one-stop shops will combine technical, financial and participatory know-how.

Simplify permitting and administrative procedures: Introduce streamlined or fast-track permitting processes for community-led renewable projects by organising a (digital) one-stop shop for

[5] European Court of Auditors. Special report 10/2026: Energy communities – Potential yet to be fulfilled: https://www.eca.europa.eu/en/news/NEWS-SR-2026-10
[6] ibid

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applications, reducing fees for small-scale or citizen-led initiatives and standardizing grid-connection procedures. Reducing administrative complexity lowers barriers for volunteer-driven initiatives lacking large legal or technical teams.

Guarantee fair and priority access to the electricity grid: Mandate transparent, non-discriminatory, and timely grid-connection processes with caps on grid-connection fees, an obligation for grid operators to justify delays, and priority access for community-owned renewable generation. Such mechanisms ensure communities are not disadvantaged compared to larger commercial developers. In its "Guidance on efficient grid connections" (C/2025/8473), the Commission encourages Member States to abandon the first-come-first-served model and introduce a prioritisation framework that can be based on criteria such as grid-friendly uses, climate-friendly uses, social value, etc. This provides a legal basis for Member States to create a prioritisation framework for energy communities to gain better grid access.

Strengthen capacity building and technical assistance: Many communities lack technical, legal, or financial expertise in energy project development. Effective support can include national or regional community energy helpdesks, training programs and toolkits and publicly available templates (contracts, feasibility studies, governance models). Formal, institutional recognition of secondary structures and the provision of structural funding can help build capacity and accelerate new community energy projects, as has been successfully demonstrated in the Netherlands, France, and Belgium[7].

3.3. Policy opportunities

The Citizens Energy Package has presented a widely ambitious goal of 90 GW of community energy projects by 2030. As a follow-up, the Commission presented an Action Plan for Energy Communities and dedicated guidance on how Member States can create national enabling frameworks and financing support schemes for energy communities. All this comes on the backdrop of an unprecedented energy crisis caused by the conflict in the Middle East.

While skyrocketing energy prices and a new inflationary wave are set to last for (at least) months, energy communities are emerging as a key tool for affordability: the Commission estimates that the average EU household can save up to 1100 euros/year[8] through participation in an energy community. Across the EU several energy communities are showing their reflexes to the new crisis: cooperative suppliers like Coopernico (PT), Enostra (IT) and Ecopower (BE) are providing tools and

[7] REScoop.eu Structural funds for community energy federations: Belgium shows the way. https://www.rescoop.eu/news-and-events/news/structural-funds-for-community-energy-federations-belgium-shows-the-way

[8] https://energy.ec.europa.eu/publications/action-plan-affordable-energy-unlocking-true-value-our-energy-union-secure-affordable-efficient-and_en

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incentives to their members to consume energy at times of the day when energy is cheapest (e.g., to charge their car at midday while the sun is shining). Similarly, Cociter (BE) has announced a price cap and is actively providing energy efficiency tips to its members. **Member States should seize the opportunity to mainstream energy communities, including through local energy sharing projects that involve vulnerable households, as a concrete measure against the energy crisis.**

In its package of support measures against the energy crisis, Spain announced the simplification of the regulatory framework for community energy projects by local authorities, as well as the full implementation of a national enabling framework for energy communities.[9]

The Social Climate Fund can be used to fund such projects, using early revenues from the European Investment Bank's frontloading facility. Already >11 Member States[10] have indicated that they plan to leverage their Social Climate Plan to incentivise local renewable energy projects through energy communities, including several COMET pilot countries (e.g., SI, HR, PL). **Managing authorities are advised to immediately activate these calls for funding and to use the dedicated Cohesion For Transitions Guide[11] on how to create a funding call for energy communities.**

Crucially, DG ENER and the European Investment Bank should create a permanent, EU-level funding instrument for energy communities. The LIFE ENERCOM Facility project has shown that there is great appetite by local communities to implement renewable energy projects, should there be a financial incentive in place. An EU-level revolving loan-to-grant scheme could ensure that energy communities can keep growing, fulfilling the Citizen Energy Package's goals, even in the absence of dedicated support schemes at the national level.

On a more forward-looking note, in a constrained fiscal environment, energy communities provide good returns on public investment. Experience from the Netherlands and France, and the LIFE ENERCOM Facility project, shows that 1 euro of public subsidy can trigger 40-60 euros in citizen capital down the line. **This is why Member States and the Commission should support energy communities in the 2028-2034 EU budget[12].** This includes:

1. **The National and Regional Partnership Plans**

As part of the new budget architecture proposed by the Commission in July 2025, almost 50% of the entire two-trillion-euro envelope of the next EU budget will go to the so-called "National and Regional Partnership Plans" (NRPPs). Every Member State now has to draft its NRPP, outlining a

[9] Agencia Estatal Boletín Oficial del Estado (2026). Real Decreto-ley 7/2026, de 20 de marzo, por el que se aprueba el Plan Integral de Respuesta a la Crisis en Oriente Medio.
[10] https://www.rescoop.eu/policy/financing-tracker/social-climate-fund
[11] https://ec.europa.eu/regional_policy/sources/policy/communities-and-networks/cohesion-4-transition/C4T_WG-Energy_Public-financing-calls-energy-communities_final_.pdf
[12] https://www.rescoop.eu/toolbox/community-proof-rescoop-eus-analysis-of-the-2028-2034-eu-budget-proposal

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series of reforms and investments for its entire economy (energy, regional cohesion, migration, agriculture, etc.). The NRPPs adopt the 'cash for reforms' model first observed in the Recovery and Resilience Facility (RRF). The NRPPs can thus be the implementation vehicle for the Citizens Energy Package by bringing in the two missing elements: funding and legally binding reforms. There is precedence to this: Member States used their Recovery and Resilience Plans to provide significant funding to energy communities (Italy, Lithuania, Spain, and Czechia). But most importantly, they pushed through important enabling reforms, such as enabling energy sharing for energy communities.

Most COMET partners/pilots struggled with access to finance, as most Managing Authorities of Cohesion Policy in the 2021-2027 period either were not aware of the concept of energy communities or had already committed funding to other priorities. It thus became evident that more proactive engagement will be required for the 2028-2034 period, vis-à-vis the NRPPs. REScoop.eu, with contributions from COMET partners, prepared national factsheets linking energy communities[13] to goals of regional cohesion, rural development, and affordability.

2. **The European Competitiveness Fund**

The European Competitiveness Fund (ECF) is another major stand-alone program of the 2028-2034 budget, with a hefty €234 billion allocation. The ECF is separated into four policy windows (clean transition and decarbonisation; digital transition; health, biotech, agriculture and bioeconomy; defence, and space), each with a dedicated budget allocation. While the clean transition window has a very small budget (26.1 billion euros), it should **support energy communities through multi-annual work programmes, collaboratively developed with social partners and other stakeholders.**

At the same time, the LIFE program should be maintained as a standalone, direct management program in the 2028-2034 EU budget.

Lastly, under the Grids Package and specifically the revision of the Permitting Directive, the Commission proposed to introduce mandatory benefit sharing with local communities for projects over 10 MW, as well as introducing an independent facilitator to improve local consultations. Member States should quickly implement the above proposals, as well as accelerate the implementation of community energy projects as a concrete tool to shield citizens from price increases.

3.4. Good practice examples to illustrate good policy solutions

As in the researched 7 Central- and Eastern-European countries, many policy gaps remain; it is difficult, if not impossible, to find examples of good practice on policy solutions. However, several

[13] https://www.rescoop.eu/toolbox/stronger-communities-thriving-regions

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Good practice examples have been identified by the LIFE COMET partners and are presented here to serve as an inspiration for policymakers and decision-makers in the region.

The crucial importance of stable support schemes: in 2018, when the first law for energy communities in Greece was operationalised, two support schemes existed: a feed-in-tariff for energy communities to sell energy, and virtual net metering, for self-consumption. This led to an explosion of community energy projects (in 2026 totalling over 1700) and underscores the importance of support schemes to create viable and replicable business models for energy communities. One such example is the "Hyperion" Energy Community in Athens[14]. The community's first project, a 500 kWp solar park, today includes over 120 members, including small business and vulnerable households. The community is also encouraging energy savings among its members through a practical guide with tips on reducing consumption, promoting efficiency, and strengthening community bonds. Since 2024, Virtual Net Metering has been phased out for Virtual Net Billing, with the metering period switching from 3 years to 15 minutes, particularly to incentivise real-time consumption and alleviate pressure to the grid. The phasing in of Virtual Net Billing occurred with crucial implementation gaps, particularly around the remuneration process for excess energy (i.e., not self-consumed, but sold to the grid), as well as contractual obligations between the community and the electricity supplier. These gaps were later ameliorated in June of 2026 with a Ministerial Decree, but the two-year implementation gap effectively froze the community self-consumption market segment in Greece (only 61 community energy projects filed for a grid application over the period). This underscores the importance of stability and predictability in the implementation of support schemes.

Facilitating the inclusion of vulnerable citizens in energy communities: Greece has acknowledged the multifaceted role of energy communities in promoting social inclusion by embedding them in its updated national strategy against energy poverty[15]. The document highlights the role of such groups in promoting collective self-consumption schemes and citizen-led renovations. Moreover, the country has conducted its first assessment of barriers and opportunities for energy communities (as required by Article 22 of the RED) in the spring of 2026. It remains to be seen, however, whether these two important political developments will be backed by new, enabling regulations and funding.

Providing financial incentives for energy communities: As another positive example, we highlight Slovenia, where structural measures were put in place to support energy community projects. This includes a) investment support in the form of a subsidy funded from a tax on energy bills and b) a financing model for energy communities developed by the national Eco Fund[16], offering low interest rates for community project loans.

Using EU funding to provide financial support to energy communities: In Romania, although the legislative framework for energy communities is not yet fully developed to allow their actual functioning, the Ministry of European Funds has found a way to finance municipalities in Just

[14] https://hyperion-community.gr/#erga

[15] https://www.oenet.gr/media/k2/attachments/epikairopoiimeno_sxedio_drasis_katapolemisis_tis_energeiakis_endeias.pdf

[16] https://ekosklad.si/

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Transition Fund areas for the purpose of eventually establishing such communities. Under this mechanism, the municipality applies for funding on behalf of itself and the other stakeholders who wish to become part of the future energy community.

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4. Position statements

4.1. Position statement 1: Formal recognition of energy communities' coalitions at the national level

Community energy coalitions have a crucial role as intermediaries between grassroots initiatives and institutional actors. Coalitions of energy communities and their supporters help to connect and coordinate communities, provide technical and legal support, strive for better market conditions, and translate practical experience into policy dialogue. They strengthen collective capacity, reduce risk, and enable energy communities to move from isolated projects toward a more systemic impact. The European Commission's Recommendation on supporting the development of energy communities and maximising the potential of self-consumption, C(2026) 2850 of 30 April 2026, and its accompanying Staff Working Document, SWD(2026) 126, also highlight that federations and secondary structures need to be promoted and their capacity to deliver services and facilitate financing for local communities should be supported.

As actors embedded in grassroots movements, community energy coalitions are well placed to systematically gather and operationalize field feedback, thereby generating qualitative insights, enabling the rapid replication of best practices, and supporting inclusive participation in the energy transition.

The LIFE COMET partners propose the following three steps to enable community energy coalitions to play a crucial role in uniting community stakeholders to collectively overcome systemic barriers, pool resources, and deliver services that individual energy communities cannot easily provide alone.

Bring coalitions to the table for political dialogue

Formal recognition of energy community coalitions at the national level is essential to establish structured and continuous policy dialogue between governments and citizen-led energy initiatives. In some Member States, policy frameworks do not sufficiently recognise or enable energy communities, resulting in uneven uptake across Europe. Various institutionalised dialogue mechanisms, such as advisory councils, consultative platforms, or co-creation processes, can enable coalitions to contribute meaningfully to the policies shaping the energy transition. Community energy coalitions can be embedded within existing governance structures, including the Multilevel Climate and Energy Dialogues foreseen under the Governance Regulation and the monitoring committees of EU funds, including Territorial Just Transition Plans.

The COMET project has demonstrated the value of coalitions and secondary structures in strengthening the community energy sector and improving its ability to engage with policymakers

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and financiers. Several successful examples emerged during the project. In Poland, the national federation SERC provides energy cooperatives with representation, advocacy, advisory services and support in accessing public and EU funding programmes. In Greece, DESMI has developed into a national association that offers capacity building, policy engagement and practical support for energy communities. In Croatia, the Forum of Energy Communities has become a recognised platform linking community initiatives with municipalities, regulators and financial actors, while in Hungary the Alliance of Energy Communities was established to provide a common voice and support structure for registered energy communities.

These experiences show that federations and secondary structures can aggregate expertise, coordinate advocacy efforts, reduce transaction costs and help local communities overcome technical, regulatory and financing barriers. More broadly, one of COMET's key achievements has been the establishment and consolidation of national coalitions that have increased the visibility of community energy, strengthened policy dialogue with ministries and regulators, developed joint policy positions and created lasting support networks between communities, municipalities, NGOs, researchers and financial institutions.

Through regular engagement, energy community coalitions can help identify barriers, surface innovative solutions and accelerate the uptake of best practices across regions. **Mature coalitions can also bundle community energy projects into investable portfolios, thus facilitating better leverage of private finance.** Formal recognition should therefore go beyond symbolic acknowledgement and include clear mandates, access to information and the resources needed to participate on equal footing with other stakeholders. Policymakers should support these structures because they act as intermediaries between governments and local energy communities. They can identify regulatory barriers, communicate policy needs, build capacity, facilitate knowledge exchange and improve access to finance. In several COMET countries, coalitions have already strengthened policy dialogue, developed joint policy positions and created lasting support networks among communities, municipalities, NGOs, researchers and financial actors. By positioning coalitions as strategic partners, regulatory frameworks can foster a more inclusive, adaptive and socially grounded energy transition. **Crucially, coalitions can facilitate the faster uptake of renewable energy projects by local communities, strengthen social acceptance and contribute to Europe's energy security and resilience in times of geopolitical and energy market uncertainty.**

Support should therefore focus on formal recognition of coalitions in energy governance processes, stable operational funding, capacity-building programmes, and dedicated resources for community support services. By empowering coalitions and federations, policymakers can accelerate renewable energy deployment, increase citizen participation, strengthen social acceptance of the energy transition, and ensure that community energy contributes more effectively to national climate and energy objectives.

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Expand the dialogue by including key stakeholders

To maximize impact, policy dialogue should be broadened to systematically include other key stakeholders—such as distribution system operators, suppliers, energy agencies, regulators, and other relevant actors. Bringing these groups into structured engagement with energy community coalitions creates a collaborative ecosystem where operational constraints, market barriers, and regulatory challenges can be jointly addressed. Such multi-stakeholder dialogue enables the co-design of solutions to improve grid access, market participation, financing conditions, and administrative procedures. By fostering mutual understanding and aligning incentives across the energy system, this inclusive approach helps create enabling market and regulatory environments that support the sustainable development and scaling of energy communities. In this sense, the Commission could work with Member States to replicate its successful 'Citizens Energy Forum' at national levels.

Provide the legislative framework and financial resources that will enable coalitions to become a key driver for the development of energy communities

A robust legislative framework, coupled with adequate and sustained financial resources, is critical to empower energy community coalitions as key drivers of sector development. The legislative framework should clearly define the role and mandate of coalitions, ensuring their formal participation in policy processes and recognizing their function as intermediaries between policymakers and local initiatives. In parallel, dedicated funding mechanisms—such as operational grants, programmatic funding, and access to EU and national support schemes—should be established to secure long-term functioning and independence. Equipped with these resources, coalitions can provide essential technical and legal support to emerging and existing energy communities, facilitate knowledge sharing and peer learning, and deliver targeted capacity-building activities. By strengthening the capabilities of local actors and reducing barriers to entry, coalitions play a pivotal role in enabling the replication, professionalization, and scaling of energy communities. There is successful precedent of national/regional governments providing structural financial support to community energy coalitions, including in Belgium, the Netherlands, and France[17].

[17] https://www.rescoop.eu/news-and-events/news/structural-funds-for-community-energy-federations-belgium-shows-the-way

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Why should policymakers support community energy coalitions?

LIFE COMET experience shows that national coalitions are not only representative bodies, but also cost-effective delivery mechanisms for public policy objectives. Rather than supporting hundreds of individual initiatives separately, public authorities can work through coalitions that:

- provide technical, legal and financial assistance to emerging energy communities;
- operate one-stop shops and capacity-building programmes;
- aggregate projects to improve access to finance and EU funds;
- collect evidence on regulatory barriers and provide structured feedback to policymakers;
- facilitate cooperation between municipalities, citizens, financiers, DSOs and regulators;
- accelerate replication of successful community energy models across regions.

Member States should therefore prioritise support for national federations, umbrella organisations and multi-stakeholder coalitions with a proven capacity to deliver services to local communities. Support should combine (1) formal participation in energy governance processes, (2) multi-annual operational funding, and (3) dedicated resources for advisory, financing and training services. Experience from COMET countries demonstrates that such structures strengthen policy implementation, increase uptake of renewable energy projects, improve access to finance and reduce administrative barriers for citizens wishing to participate in the energy transition.

4.2. Position statement 2: Unlocking the funding for energy communities

Access to finance remains a key barrier for energy communities[18]. This stems from various factors, such as lack of financial literacy amongst voluntary-led initiatives, lack of information around EU funding opportunities, and lack of interest by traditional financial institutions to collaborate.

This position statement reflects the shared position of the LIFE COMET consortium, drawing on evidence gathered through the project's maturity assessments, national analyses, stakeholder consultations, coalition-building activities, and practical experience supporting energy communities in seven Central and Eastern European countries. Across all participating countries, limited access to appropriate financing emerged as one of the most persistent barriers to community energy development. The recommendations presented below therefore build directly on LIFE COMET findings and on the practical experiences of consortium partners working with

18 https://circabc.europa.eu/ui/group/8f5f9424-a7ef-4dbf-b914-1af1d12ff5d2/library/22055ff9-1f49-41f8-a321-cbf20ca3d316/details

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emerging energy communities, while also aligning with the European Commission Recommendation on supporting the development of energy communities and maximising the potential of self-consumption (C(2026) 2850).

From local energy sharing to shared mobility and collective renovation schemes, energy communities have robust and profitable business models. The Commission estimates that the average household can save up to 1100 euros per year[19] through participation in an energy community. Yet, economic incentives are not the primary driver behind energy communities: they often prioritise social and environmental outcomes, such as reinvesting profits in housing renovations, planting trees, improving local public transport, or organizing community building events. This is backed by research: community energy projects generate two[20] to eight[21] times more benefits for local economies compared to private renewable energy projects. **Energy communities can thus be key tools for affordability and territorial resilience, especially in the light of ongoing energy crises, such as the war in Iran[22].**

Public investment in community energy projects can produce significant and far-reaching results: while ~74% of energy communities have social goals[23], the make-or-break element is the availability of public subsidies. Yet, at the time of increasing fiscal constraints, it's important to consider the strong leverage factor of energy communities: 1 euro of public subsidy can trigger 40-60 euros in citizen capital down the line - capital which stays in the region. A study from the Occitanie region[24] showed that for every 1 euro of public subsidy into energy communities, 50 euros are generated for the territory.

As REScoop.eu's Energy Communities Tracker shows[25], many Member States have not yet created an enabling framework for energy communities. This entails a lack of available funding instruments at the national level – neither development funds (e.g., a grant to procure equipment) nor operational support schemes (e.g., feed-in tariffs or contracts for difference). **This means that oftentimes there is no viable business model for energy communities**, and this is particularly stark in the Central-Eastern Europe region, significantly hampering the growth of the sector. The lack of clear revenue channels constricts other funding opportunities, such as from banks, who often refuse to work with community energy stakeholders.

For the aforementioned reasons, the LIFE COMET partners propose the following steps to create an enabling financing environment for energy communities:

Create a comprehensive national enabling framework for energy communities

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19 https://energy.ec.europa.eu/publications/action-plan-affordable-energy-unlocking-true-value-our-energy-union-secure-affordable-efficient-and_en

20 https://energie-partagee.org/ressource/etude-retombees-eco-2/

21 https://www.rescoop.eu/uploads/rescoop/downloads/RWS_Wind_CDW.pdf

22 https://www.rescoop.eu/toolbox/renewable-energy-communities-a-safe-haven-in-times-of-crisis

23 https://www.espon.eu/projects/tandem-territorial-analysis-decentralised-energy-markets

24 https://fedarene.org/wp-content/uploads/2024/03/SRIA-2024_Final-Digital-version_compressed.pdf

25 https://www.rescoop.eu/policy/transposition-tracker/enabling-frameworks-support-schemes

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The absence of secondary legislation, such as regulations for energy sharing, prevents viable business models for energy communities. This creates negative feedback loops, discouraging engagement from citizens and financial institutions. The Citizens Energy Package has created new and ambitious momentum for energy communities, setting a target of 90 GW of community energy projects by 2030, with a follow-up Action Plan for energy communities and guidance to Member States on how to set up a national enabling legal and financing framework.

We urge swift and comprehensive transposition of the Directives, making sure that Member States, among others:

- Establish an easy and transparent registration process for energy communities, utilising a public registry and an Oversight Body;
- Conduct an assessment of barriers and potential for energy communities, translating this into a concrete national target for energy communities, in line with the Citizens Energy Package objective;
- Permitting is fast and simple, providing a transparent business and financial planning overview for communities;
- Ensure that there are appropriate subsidies and incentives in place for vulnerable households to join energy communities, providing them with a structural solution against energy poverty.

Create new (or adapt existing) support schemes for energy communities

For starting contexts, such as in the CEE region, the feed-in-tariff model could be appropriate, or at least contracts for difference. Dedicated incentives for self-consumption, such as (virtual) net billing, should also be put in place, with the operating aid cumulated with investment aid for battery storage.

In the case of existing support schemes, e.g., auctions for renewable energy, Member States should create a level playing field for energy communities. For example, Ireland and Germany have created ring-fenced auctions just for energy communities.

Notably, the Cohesion 4 Transitions initiative of DG REGIO has created a dedicated guide for Managing Authorities[26] on how to design support schemes/funding calls for energy communities.

Provide structural funding to the national community energy coalition

Coalitions mutualise services, replicate results, pool projects, and overall act as a single voice for the national community energy movement. France, Belgium (Wallonia and Flanders[27]), and the Netherlands have all provided structural funding to the national coalition, with the aim of creating

[26] https://ec.europa.eu/regional_policy/sources/policy/communities-and-networks/cohesion-4-transition/C4T_WG-Energy_Public-financing-calls-energy-communities_final_.pdf

[27] https://www.rescoop.eu/news-and-events/news/structural-funds-for-community-energy-federations-belgium-shows-the-way

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second-level services for energy communities. These include revolving funds, tailored capacity-building programs, and trialling new business models.

The national coalition of energy communities can help increase visibility around national support schemes and EU funds, increasing overall absorption and effectiveness. Oftentimes, such coalitions also create "Community Energy Financing Schemes", i.e., revolving funds that can mobilise 1 euro of public capital into 40-60 euros of citizen capital for new projects.

Simplify access to funds for energy communities

Energy communities struggle to identify and apply to EU funding opportunities (e.g., Modernisation Fund, European Regional Development Fund, Just Transition Fund). Member States should create a single portal / One Stop Shop through which all available EU funds can be easily accessed with simplified applications.

The national coalition of energy communities should help to co-manage[28] and advertise this One Stop Shop.

Leverage the European Semester and the EU 2028-2034 budget to support energy communities

As part of the 2028-2034 EU budget framework, every Member State has to draft a National and Regional Partnership Plan (NRPP). Through this single Plan a Member State has to outline reforms and investments for almost all sectors of the economy, including energy. REScoop.eu and Friends of the Earth have prepared national factsheets, linking energy communities to the goals and objectives of the NRPP, such as regional cohesion, support for rural areas, and affordability.

The NRPPs adopt the 'cash for reforms' model first observed in the Recovery and Resilience Facility (RRF). Effectively, this means that a Member State has to fulfil certain milestones in order to unlock subsequent funding tranches. A positive side to this is that it ensures European policy coherence and predictability for citizens and businesses.

Crucially, Member States can leverage the NRPPs to push through enabling reforms for energy communities, such as simplified permitting, transparent registration processes, and the setup of other support schemes.

The European Commission should more strongly leverage the European Semester[29] process to pressure Member States to complete the transposition. Again, through the cash-for-reforms model, EU funds should be withheld from Member States failing to adequately transpose energy community provisions. It's worth noting that this approach has been endorsed in the Committee of the Regions (draft) opinion on the Citizens Energy Package[30].

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28 https://www.rescoop.eu/toolbox/fit-for-communities-ensuring-the-next-eu-budget-can-support-citizen-energy-projects-effectively

29 https://www.rescoop.eu/toolbox/energising-the-semester

30 https://www.cor.europa.eu/en/our-work/opinions/cdr-1300-2026

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Build a permanent, EU-level funding instrument

The European Investment Bank should create a pan-European Energy Communities Facility, providing grants, technical assistance, guarantees, and loans. The LIFE ENERCOM Facility has shown that there is huge interest by local citizens and communities for such an EU-level instrument to spur growth, especially in Member States with few available funding instruments.

The instrument could be operated with a similar logic to the ENERCOM Facility, employing national experts (notably coalitions) who can pool applications and conduct a first round of due diligence to reduce lending risk, while also standardizing the application process.

Why should policymakers support funding of energy communities?

Funding energy communities is a high-impact public investment that delivers economic, social and energy-transition benefits. Community energy projects help households reduce energy costs, strengthen local energy resilience, and reinvest revenues into local priorities such as housing renovation, sustainable mobility and social initiatives. Research shows that community energy projects generate significantly greater local economic benefits than conventional renewable energy projects, while public support can leverage substantial private investment: every €1 of public funding can mobilise €40-60 of citizen capital. By creating local ownership and participation, energy communities also increase public acceptance of renewable energy and provide a structural response to energy poverty. Supporting energy communities therefore helps policymakers achieve climate, energy security, regional development and social cohesion objectives simultaneously, while ensuring that the economic value of the energy transition remains within local communities.

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4.3. Position statement 3: Energy communities and energy sharing - Enabling Energy Sharing for a Fair, Democratic and Decentralised Energy System

Energy sharing is an important tool both for extending citizen-led renewables and enhancing local energy communities. The Electricity Market Design regulation requires that Member States implement a framework for energy sharing by 17 July 2026, which will allow participants to allocate the electricity produced by an individual household or community member to other consumers or members. However, the legislation is unevenly implemented, and numerous barriers still hinder it.

Energy sharing is a mechanism that allows citizens to collectively access and use renewable energy, moving beyond individual rooftop self-consumption. It enables households, tenants, and local communities to benefit from locally generated electricity without necessarily owning generation assets. By allocating renewable kilowatt-hours within a defined group of consumers, energy sharing supports participation in the energy transition to a wider group of people. Importantly, it can expand access to renewables for vulnerable or energy-poor households and tenants, who would otherwise face technical and financial barriers to participation.

These findings should also be read in light of the European Commission's Recommendation on supporting the development of energy communities and maximising the potential of self-consumption, C(2026) 2850 of 30 April 2026, and its accompanying Staff Working Document, SWD(2026) 126. Published as part of the Citizens' Energy Package, the Recommendation sets an EU-wide ambition of up to 90 GW of installed renewable capacity through energy communities and structures its guidance to Member States around five areas: (1) effective enabling frameworks, (2) access to financing, (3) awareness-raising and capacity building, (4) social inclusion and public participation, and (5) digital innovation and system integration. LIFE COMET's country evidence base maps closely onto these five pillars, and the recommendations below are framed accordingly.

Access to energy sharing, especially coupled with storage & demand response, can be a powerful tool for citizens, local authorities, and SMEs to **significantly reduce and/or stabilise energy prices.**

National Experiences

This section draws on evidence gathered through the COMET project and on discussions held in REScoop's working groups. Together, these sources show that there is both opportunity and risk present in current deployment models across Europe.

Experience from the COMET project:

Slovenia - Slovenia has recently introduced a formal legal definition of energy sharing (“souporaba energije”) through amendments to the Electricity Supply Act, transposing provisions of the EU

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Electricity Market Design reform. Energy sharing is defined as self-consumption of renewable energy by active customers who either produce, store, or receive electricity from other participants via contractual arrangements or legal entities. The framework allows sharing between two connection points, with electricity allocated based on predefined shares and settled in 15-minute balancing intervals. Importantly, the scheme applies across the entire country and enables participation through contracts governed by civil law, without requiring physical proximity between participants. Vulnerable and energy-poor households will be supported through financial measures or allocated shares of generation, particularly in publicly supported projects. The system became operational on 1 July 2026, meaning that while Slovenia has an advanced legal framework in place, practical implementation is just beginning, and key operational details (such as information systems and market integration) are yet to be fully tested.

Greece - There is no definition of energy sharing, as this is not currently regulated as an activity in Greece. Notably, energy communities can engage in collective self-consumption through virtual net billing (15-minute metering period, replacing the previous virtual net metering, where the netting period occurred over 3 years). Any energy produced (and not self-consumed within the 15-minute window) is sold at spot market price. The supplier directly awards the associated revenues to each respective member's bank account on a monthly basis. 51% of the members of a VNB scheme have to have their primary residence registered in the same region as the 'office' of the energy community. Other than that, members can be located anywhere in the country. Vulnerable households may participate in VNB schemes at no own cost, without being members of the community (i.e., their participation is subsidised by other members). There are no grid fee exemptions for members participating in a VNB scheme, regardless of proximity to the project.

Any energy that is not self-consumed within the 15-minute netting period is sold at spot market prices. Overall, there are still important gaps in the legislation regarding VNB for energy communities, as it is not clarified how remuneration for the sold energy takes place or how the system could work with the inclusion of a battery system.

Estonia - Estonia currently has no energy sharing system in place yet. Right now, every household has one meter and one supplier, and there is no mechanism for consumers to share or sell electricity between themselves. Although there is no regulatory basis for it, it is technically possible for apartment associations to share energy generated by rooftop solar panels among their members. It is also possible to share externally; just the grid costs are double.

Romania - In Romania, the primary legislation enabling energy sharing has been enacted; however, the secondary legislation required for its practical implementation is still pending. ANRE (the National Energy Regulatory Authority) has drafted an order to regulate energy sharing, but this has not yet been formally approved.

The regulatory framework for energy communities is in a similar position — the legal foundation exists, but the implementing rules are still being developed. Both sets of secondary regulations are expected to be in place by the end of 2026, at which point energy communities will be able to formally establish and operate under a complete and functional legal framework.

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Croatia - In Croatia there is no exact definition of energy sharing, but both the Electricity Market Law and RES Law do mention energy sharing in different articles related either to active customers/self-consumers or energy communities. In theory energy sharing should be possible either through energy communities for their members or through a group of active customers that does not require the setting up of a legal entity but rather is formed through the signing of contracts. As of September 2026, there are two practical examples of energy sharing. The national DSO has adapted their technical system to enable energy sharing and, from the 1st of April, started and finished the process of contracting the energy sharing service with 2 out of 3 formally registered energy communities. In August and September of 2026 members of energy communities that are participating in energy sharing have received first receipts with shared energy, but we still do not have the results of analysis of the results and still cannot confirm that energy sharing as it is currently implemented delivers economic value to the participating members and community overall. Also, we still do not have any example of energy sharing for a group of active customers, for example, tenants of a multi-apartment building, and as well there are no specific support schemes for vulnerable customers and customers affected by energy poverty to make energy sharing, or participation in energy communities, easier for them. The main barrier for energy sharing is still lack of support and clarity regarding the steps for the foundation of energy communities and/or groups of active customers, as well as lack of practical experience that would show if energy sharing made economic sense.

Hungary – Hungary has a substantial potential in community energy initiatives, with its 315,000 household-sized PV setups adding up to 2.85 GW total capacity decentralized across the country. Despite the significant capacity and the existing formal legal framework and recent legislative changes showing positive momentum (integration of apartment-building energy sharing and energy cooperatives into the Electricity and Cooperative Acts), the practical implementation of EC initiatives continues to face severe, systemic barriers. When it comes to energy sharing, there are several barriers. The first is that energy sharing is enshrined in the law, but the implementation is missing. An obstacle is that energy communities can only share electricity between their members, but they cannot share it with an external entity. Currently it is also not clear whether the income generated from energy sharing is subject to VAT or exempt from VAT. A genuine breakthrough will require a radical simplification of the regulatory environment, the provision of expert support, and more flexible administrative procedures that recognise the unique requirements of community-based energy production. To unite these initiatives and organise advocacy efforts, the Federation of Energy Communities Hungary (Energiaközösségek Szövetsége Magyarország) was established in March 2026, with the participation and support of the Solidarity Economy Centre within this project.

Poland - Poland has established a legal basis for energy sharing, although the regulatory framework is still evolving and is not yet as advanced as in some other EU Member States. Most practical examples of energy sharing in Poland currently operate through energy cooperatives. The sector is developing rapidly – as of September 2026, there are nearly 900 energy cooperatives in Poland. However, territorial restrictions remain a significant barrier. In practice, energy cooperatives can currently operate only in rural and urban-rural municipalities. Although legislation

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allowing energy cooperatives to be established in urban municipalities entered into Polish law in January 2026, its application is subject to the completion of an ongoing European Commission procedure concerning compliance with EU State aid rules. As a result, this framework cannot yet be applied in urban areas. Experience with energy sharing has generally been positive, but further development requires addressing regulatory and technical barriers, including simplifying regulations, improving energy settlement mechanisms, and facilitating access to the grid. Enabling energy cooperatives to operate fully in urban areas will be an important step towards scaling up energy sharing across Poland.

Findings based on discussions held in REScoop's working groups

Germany – The country's new energy sharing law has ambitious aims in empowering citizens, but its effect is likely to be limited. It only applies within a single grid area, and the data exchange system is complex. Another barrier is the slow implementation of smart meters and the fragmentation of distribution system operators (DSOs).

The Netherlands - It is currently only possible to share energy within one supplier, but there is debate about extending the possibility across different suppliers. There are concerns that the provider might control both energy flows and data, limit community control and autonomy, and increase costs.

Spain - Virtual energy sharing has proven technically feasible and financially stable, but low wholesale electricity prices mean participants see limited direct benefits.

France - Challenges remain around managing surplus energy and fairly distributing costs among participants and non-participants. Lowering network tariffs for locally shared energy is one such way to incentivise participation, but this should be developed in an inclusive and comprehensive way. Tariff mechanisms and rules for allocation are important in ensuring local energy gains are distributed in a fair manner and local communities' initiative is supported.

Austria - The country has introduced a system of tiered network tariffs that differentiates fees based on the geographical scope of energy sharing schemes. Because they have less of an impact on the larger grid, local schemes—like those found in a single building or a small neighbourhood—benefit from lower network fees. Schemes that operate across regional or national grids pay higher tariffs, ensuring that network costs are allocated fairly. This approach incentivises localised renewable energy production and consumption while maintaining system efficiency and fairness. Austria offers a practical model for establishing a balance between financial attractiveness, grid management, and citizen participation by linking tariff design to the physical grid impact.

Brussels region - The region demonstrates how regulatory support can facilitate inclusive, locally focused energy sharing. In order to lower participants' administrative and network costs, the regional grid operator provides rebates for energy sharing programs that run behind the same substation. Matching renewable supply with local demand can result in system-wide benefits.

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potentially offsetting revenue losses from lower network charges, according to analysis commissioned by the regulator.

Alignment with the EU Recommendation on Energy Communities and Self-Consumption

The Action Plan annexed to the Recommendation commits the Commission to specific, dated measures under each of the five pillars, several of which correlate directly to gaps identified in the country evidence above.

- Effective enabling frameworks: the Commission plans to assess the need for further simplification and alignment of EU definitions of energy communities and to monitor national barriers and good practices through the CEAH and the annual Citizens' Energy Forum and Regulatory Roundtable on Energy Policy for Consumers. This is directly relevant to Romania and Croatia, where primary legislation exists but secondary rules and definitions remain unsettled, and to concerns raised in several countries about unfair marketing practices around energy communities and sharing, which the Commission has also committed to investigate.
- Access to financing: planned measures include raising awareness of InvestEU guarantees for affordable community loans via the Green Gateway Platform, publishing a financing toolbox on community energy through the CEAH, launching a working group on energy communities under the Energy and Managing Authorities Network to boost uptake of Cohesion Funds, and refinancing the Energy Communities Facility beyond 2027 to seed over 140 communities at the pre-development stage. These instruments could directly reinforce Poland's context and Slovenia's solidarity mechanism for energy-poor households and could help Croatia and Romania move beyond the pilot stage.
- Awareness-raising and capacity building: the Commission intends to inform citizens, local authorities, farmers and small businesses of their rights through the Covenant of Mayors and a dedicated communication campaign, provide technical assistance via the CEAH, and mobilise LIFE CET funding for peer-to-peer learning and professionalisation. This speaks directly to the awareness gap documented in Poland's CBOS survey, where over half of rural residents could not define an energy cooperative, and complements the advocacy role now being played by Hungary's newly established national federation.
- Social inclusion and public participation: measures include technical assistance to local authorities via the Energy Poverty Advisory Hub (EPAH), a 'community of practice' on social inclusion criteria in public procurement under the Public Buyers' Platform, an implementation guide on citizen participation (CEAH/EPAH), peer-to-peer training between coal, peat and oil shale regions, and a standardised model contract between project developers and energy communities. These would fill a gap in several countries: unlike Greece, Croatia and Hungary currently have no dedicated support scheme for vulnerable or energy-poor households in energy sharing.

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- Digital innovation and system integration: the Commission plans to mobilise LIFE CET funding for smart local solutions (neighbourhood batteries, EV charging, energy management systems), promote integration of energy communities into local energy planning via the Covenant of Mayors and CEAH citizen energy dialogues, provide Horizon Europe funding for community-led microgrids and €12 million for AI-based forecasting to optimise energy sharing, and explore standardised integration of local energy markets with the wholesale market from 2027. This is directly relevant to the barriers reported across almost every country surveyed – from Germany's fragmented DSO landscape and slow smart-meter rollout to Croatia's still-untested pilot metering systems.

LIFE COMET recommends that Member States and the Commission use these dated Action Plan commitments as a concrete accountability tool: national NECP updates and energy-sharing transposition reports should track progress against all five pillars and their specific 2026–2027 deliverables, not only against the headline 90 GW capacity ambition. Given that digital innovation/system integration and social inclusion/public participation show the weakest practical progress in the country, evidence gathered through COMET and REScoop's working groups, the Commission's monitoring exchanges – through the CEAH, the Citizens' Energy Forum, and the 2028 citizen energy dialogue – should give these two pillars particular priority.

Main challenges

Across these European countries, many similar structural problems were identified:

- **The technical and administrative complexity of the system poses a significant barrier**. Uneven smart meter roll-out, complex access to data and interoperability rules often limit the access of citizens and communities to energy sharing schemes.
- **In many market designs, established suppliers and intermediaries play a central role in enabling energy sharing, which can have both enabling and constraining effects.** On the one hand, supplier and DSO involvement can significantly reduce administrative complexity for participants, as seen, for example, in Greece, where suppliers facilitate collective self-consumption using data provided by the DSO. On the other hand, where participation is limited to a single supplier or where intermediaries retain full control over data, pricing, and allocation rules, transparency and flexibility for new participants and citizen-led initiatives may be reduced. This can lead to energy sharing being perceived more as a commercial service than a community-driven mechanism. In line with Article 22 of the Renewable Energy Directive, the key policy challenge is therefore not to remove intermediaries but to ensure that suppliers and DSOs facilitate energy transfers in a transparent and non-discriminatory way, while allowing energy communities sufficient autonomy to define allocation rules and governance arrangements.
- **Economic incentives are insufficient or mismatched with local needs and value creation**. Energy markets and networks don't reward the system benefits offered by local renewables, like grid congestion relief or reduced transmission losses.

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- **There are growing concerns regarding the "corporate capture" of energy communities** in general and energy sharing specifically by private actors who use it under the banner of citizen-led renewable energy and are only interested in the profit they can derive from it while avoiding community participation and local value retention.

Recommendations for a Fair and Inclusive Energy Sharing System

Enabling policy frameworks are necessary but not sufficient for a fair and inclusive energy sharing system. Frameworks need to actively shape outcomes in the public interest. This means creating genuine access for tenants and low-income households without significant capital or investment capacity through user-friendly administrative procedures and tailored support measures that avoid exclusion.

The role and autonomy of energy communities should be protected. While providers and other market actors can add value, energy-sharing frameworks should not be structured in ways that make communities dependent on such services at the expense of community control or at additional cost. Citizens' right to choose their supplier should not be undermined.

The economic value generated by local renewables needs to be recognised and shared equitably, by reviewing network tariffs and market rules so that the benefits of local generation can reach local users without compromising fairness across the wider system.

Community-led and public-interest schemes should be favoured over purely commercial ones, with specific legal, regulatory, and support mechanisms in place to encourage this differentiation.

Energy sharing has real potential to make Europe's energy systems more inclusive and democratic. Realising that potential requires not only technical solutions and favourable regulatory frameworks, but also sustained political will and commitment from all relevant actors – including full implementation of the Commission's 2026 Recommendation and Action Plan – to ensure the benefits reach communities rather than a handful of large providers or wealthy individuals.

4.4. Position statement 4: Tackling energy poverty through energy communities

Energy poverty—defined as the inability of households to secure adequate and affordable energy services—is a persistent social challenge in the EU, mainly driven by rising energy prices, inefficient buildings, and income inequality, but also by structural injustices. Traditional top-down solutions, such as subsidies, while necessary, often fail to deliver long-term empowerment for vulnerable households. Energy communities, as recognised by the EU's Clean Energy Package, offer a transformative bottom-up approach that combines social innovation with

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local ownership. Based on the experience of some LIFE COMET partners, properly designed energy communities can shift households, affected by energy poverty, from passive consumers to active participants in the energy transition.

Experience from some LIFE COMET partners and REScoop.eu network shows that energy communities produce direct benefits that align strongly with the needs of vulnerable households. First, collective self-consumption and shared renewable generation reduce energy bills, protecting households from volatile fossil fuel prices. Second, community ownership keeps economic value circulating locally and enables reinvestment financial income into social programmes—such as energy efficiency upgrades, targeted assistance, or solidarity funds. Third, community governance models strengthen social cohesion, giving residents voice and agency in decisions affecting their energy future. Finally, by deploying local renewable energy, storage, and flexibility services, communities contribute to decarbonisation and resilience, supporting national climate targets while increasing fairness.

Similar to LIFE COMET partners and the REScoop.eu network, the European Commission in their recommendations[31] also recognises the ability of energy communities 'to contribute to protecting vulnerable households and households affected by energy poverty' and urges that 'Member States should therefore encourage the inclusion of people, including vulnerable households, households affected by energy poverty and households with persons with disabilities in energy communities and renewable energy projects.' Furthermore, the European Commission Recommendation calls for ensuring accessibility of energy communities for all citizens, including vulnerable households and people affected by energy poverty.

In dealing with the development of energy communities, LIFE COMET partners detect that despite the energy communities' potential to tackle energy poverty, many regulatory frameworks still treat vulnerable households as a secondary target group rather than a core part of community design. Structural barriers persist: administrative complexity, lack of tailored financing, limited technical capacity, and net billing framework (low price of buying off-produced extras of electricity and high price of buying electricity from the network when the community production is not covering the needs). These hurdles disproportionately affect the very populations that energy communities could empower.

To unlock the full potential of energy communities for tackling energy poverty, policymakers should adopt a rights-based and equity-driven approach. Households, affected by energy poverty, should be prioritised at each stage—policy design, community creation, governance, and benefit distribution. This requires deliberate legal measures that embed social equity mechanisms, protect vulnerable participants, and ensure that energy communities remain inclusive rather than becoming exclusive clubs for wealthier homeowners.

[31] European Commission's Recommendation on supporting the development of energy communities and maximising the potential of self-consumption, C(2026) 2850 of 30 April 2026, and its accompanying Staff Working Document, SWD(2026) 126.

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Energy communities are not only an energy model; they are a social innovation with the capacity to democratise the energy system and reduce structural inequalities. Strong legal frameworks can turn them into one of the most impactful tools for eliminating energy poverty. This is why LIFE COMET partners suggest the following legal proposals for tackling energy poverty through the inclusion of vulnerable households in energy communities:

Raise awareness of all actors, related to energy communities building and networking, about the importance of including vulnerable households in energy communities. As many of the actors working on energy communities have low or no awareness of challenges of energy poverty, it is important to ensure that they build understanding of energy poverty and its dimensions, as well as grasp why it is important to include vulnerable households in energy communities to ensure a just energy transition. Awareness raising programmes and capacity building events for energy community actors need to include energy poverty and vulnerability aspects.

Ensure enabling financial support for the inclusion of vulnerable households in energy communities. Financial barriers for entering an energy community are one of the key obstacles in involving vulnerable people in energy communities. Hence, suitable financial support needs to be developed for vulnerable households. The Social Climate Fund is an excellent possible source for financial support of vulnerable households, and already several Member States have pledged in their Social Climate Plans to fund energy communities to tackle energy poverty[32]. Moreover, other EU or national funds can represent a basis for financing the participation of vulnerable households in energy communities. Financial schemes are also needed to address the rental sector and its specific limitations that hinder tenants' participation in energy communities with flexible membership models, as tenants represent a significant proportion of vulnerable households affected by energy poverty.

Establish priority access to support schemes for energy communities. Create a dedicated funding window for energy communities, which are focused on inclusion of vulnerable households, covering a variety of costs, from initial feasibility studies and technical assistance to upfront investment in renewable generation, storage, or efficiency upgrades. Support should cover 100% of costs for vulnerable households to remove financial entry barriers. The Cohesion for Transitions guidance document on how to create a funding call for energy communities provides further tips on how national authorities can create such energy-poverty-specific calls[33].

Reset the legal and systemic environment to support the inclusion of vulnerable households into energy communities. Net billing, for example, represents a significant obstacle in building energy communities that would include vulnerable people. It is important to review the legal and regulatory environment to identify non-financial barriers for vulnerable households and make changes that would stimulate better inclusion.

[32] https://www.rescoop.eu/policy/financing-tracker/social-climate-fund

[33] https://ec.europa.eu/regional_policy/sources/policy/communities-and-networks/cohesion-4-transition/C4T_WG-Energy_Public-financing-calls-energy-communities_final_.pdf

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Introduce a social net billing tariff with a guaranteed minimum benefit. Standard net billing schemes often disadvantage low-income households because their consumption patterns do not align with peak generation hours. A social net-billing tariff would ensure that vulnerable households receive a guaranteed minimum compensation rate for their share of community-generated electricity regardless of market price fluctuations. This would enable a higher, regulated compensation rate for vulnerable members, protection from negative hourly prices or low market revenues and shielding vulnerable participants from market risk.

Introduce mandatory social inclusion targets for publicly supported energy communities. Introduce a legal requirement that publicly supported energy communities include a minimum share (e.g., 10–30%) of vulnerable households as participants or beneficiaries, as is the case in Slovenia[34]. Compliance should be tied to eligibility for public grants, subsidies, or tax incentives.

Simplify administrative procedures for small-scale and social-purpose energy communities. Introduce a "light" regulatory regime for small-scale and social-purpose energy communities, including measures such as simplified licensing or grid connection procedures, pre-approved standard contracts, and fast-track permitting for rooftop or community-scale renewable installations.

In creating energy communities, use participatory processes that are adjusted to the needs of the vulnerable households. Usual participatory processes that lead to establishing energy communities might not always be suitable for vulnerable households. This is why participatory processes need to be adjusted to the needs of the vulnerable, e.g., by adding childcare or involving social actors trusted by vulnerable households.

Integrate energy communities into social policy. Require social welfare agencies and municipalities to collaborate with energy communities by identifying eligible households, codesigning energy poverty alleviation measures, and enabling data sharing – also intersectional data (with privacy safeguards) to monitor impact. Enshrine energy communities into national strategies against energy poverty (as Greece has done).

[34] https://pisrs.si/pregledPredpisa?sop=2025-01-1904

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Why should policymakers support tackling energy poverty through energy communities?

Energy communities offer a long-term, structural solution to energy poverty by combining affordable energy, citizen participation and local economic development. Through collective self-consumption and shared renewable energy generation, they reduce energy bills and protect vulnerable households from volatile energy prices. Unlike traditional subsidies, energy communities empower citizens as active participants in the energy system, while keeping economic benefits within local communities. Revenues can be reinvested into energy-efficiency upgrades, solidarity funds and targeted support for vulnerable households. Energy communities also strengthen social cohesion and increase resilience through local renewable energy production. By integrating energy communities into energy poverty strategies, policymakers can advance a just transition that simultaneously reduces inequality, enhances energy security and delivers lasting social benefits.

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