

Public consultation on developments and initiatives in the EU Power Purchase Agreements market

Fields marked with * are mandatory.

Introduction

[Regulation \(EU\) 2024/1747](#) mandates ACER to perform an annual assessment on the EU PPA market “ACER shall publish an annual assessment on the PPA market at Union and Member State level as part of its annual report published pursuant to Article 15(2) of Regulation (EU) 2019/942.”

ACER published its first annual assessment on the EU PPA market in November 2025. The assessment included a dedicated section in the 2025 Market Monitoring Report “[Progress of EU electricity wholesale market integration](#)” (see pages 15-20), as well as [PPA country sheets](#).

ACER acknowledges that available information remains sparse, reflecting the relatively limited transparency of the PPA market. ACER is committed to strengthening market monitoring through the continuous improvement of the data collection process.

ACER considers stakeholder views and feedback extremely valuable, a key input both for the annual assessment on the EU PPA market and the [assessment on the need for additional PPA contract templates](#) delivered in 2024. ACER has engaged extensively with stakeholders, through various channels, including [the expert group on PPAs](#), [public consultation](#), and participating in relevant PPA events and conferences.

ACER invites stakeholders to participate in this public consultation and provide their contributions, which will further enhance ACER’s monitoring activities on the EU PPA market by providing relevant knowledge, expertise and market insights.

Objective

As part of the 2026 ACER’s assessment on the EU PPA market, ACER has decided to consult stakeholders to collect input on existing regulatory and financing initiatives and/or initiatives still under development (e.g. State-backed guarantees, PPA platforms, etc.), as well as relevant recent developments and challenges.

The responses to this public consultation will contribute to improving the quality of the information at disposal of ACER, which is useful for a comprehensive and accurate annual assessment of the PPA market.

Target group

This consultation is addressed to all interested stakeholders, including but not limited to: buyers and sellers of PPAs, public authorities, consumers and industry associations, legal and advisory professionals, financial analysts and banks, information providers and market analysts, academics, think tanks, trade associations, consultancy firms and civil society.

Contact and deadline

The contact point for this consultation is: PPA.assessment@acer.europa.eu.

All interested stakeholders are invited to submit their comments by 08 May 2026, 17:00 (CET).

Providing Feedback

Your detailed and well-reasoned feedback is crucial for us to accurately assess the ongoing developments, needs and challenges. Thank you for your time and valuable contribution.

Need Assistance?

We appreciate your participation and effort in this consultation. If you have any questions or require assistance, please contact our team.

Data protection

ACER will process personal data of the respondents in accordance with [Regulation \(EU\) 2018/1725](#), taking into account that this processing is necessary for performing ACER's consultation tasks.

More information on data protection is available in ACER's [data protection notice](#) and on [ACER's website](#).

ACER will not publish personal data.

☒ Please confirm that you have read [the Data Protection Notice](#)

Confidentiality

Following this consultation, ACER will make public:

- the number of responses received;

- company names, unless they should be considered as confidential;
- all non-confidential responses; and
- ACER's evaluation of responses. In the evaluation, ACER may link responses to specific respondents or groups of respondents.

You may request that the name of your company or any information provided in your response is treated as confidential. To this aim, you need to explicitly indicate whether your response contains confidential information.

You will be asked this question at the end of the survey.

☒ I have read the information provided in this section.

Respondent's data

* Country

Greece

* Company's name

50 character(s) maximum

Hellenic Association Independent Power Producers

* Email address

This information will not be published.

g.stamtsis@haipp.gr

* Area of business

- ☐ Developer
- ☐ Utility Company
- ☐ Trader
- ☐ Off-taker
- ☐ Legal Service
- ☐ Advisory
- ☐ Transmission
- ☐ Distribution
- ☐ NEMO
- ☐ Portfolio Manager
- ☐ Academia
- ☐ Think tank
- ☒

- ☐ Trade association
- ☐ Financial analyst
- ☐ Bank
- ☐ Other

State-backed guarantees (as credit support)

Is there a state-backed guarantee in the country (or countries) in which you are active?

Background information: This regulatory tool, provided by state-owned companies (e.g., Eksfin in Norway, Bpifrance in France), is used to reduce the credit risk associated with off-taker default. Mitigating this risk provides greater certainty for producers' revenue streams, an essential factor in facilitating the financing of new assets. Therefore, state-backed guarantees could further foster the development of the PPA market.

The table below gives the possibility to share information on state-backed guarantees for each country in which you are active, and its main advantages and limitations.

How to fill the table? Select a country in which you are active, select if the initiative is available or not, write the name of the state-backed guarantee, provide a link (if available), briefly describe the main advantages and limitations.

(If you prefer not to answer, you can select "Next" at the bottom of the page and skip the question.)

	Country	Availability	Name of SBG	Link	Advantages	Limitations
1	Greece	No	50 character(s) maximum	100 character(s) maximum	500 character(s) maximum	500 character(s) maximum
2	☐ Austria ☐ Belgium ☐ Bulgaria ☐ Croatia ☐ Cyprus ☐ Czechia ☐ Denmark ☐ Estonia ☐ Finland ☐ France ☐ Germany ☐ Greece ☐ Hungary ☐ Ireland ☐ Italy ☐ Latvia ☐ Lithuania ☐ Luxembourg ☐ Malta ☐ Netherlands ☐ Poland ☐ Portugal ☐ Romania ☐ Slovakia ☐ Slovenia ☐ Spain ☐ Sweden ☐ Iceland					

Private guarantees (as credit support)

Do you find private guarantees, used to reduce the credit risk associated with off-taker default, to be available and affordable in the country (or countries) in which you are active?

The table below gives the possibility to share information on private guarantees (as credit support in case of off-taker default) for each country in which you are active, and its main limitations.

Please rate the level of availability and affordability on a scale from 1 to 5, where:

1 = Very low

2 = Low

3 = Acceptable

4 = Good

5 = Very good

Definitions:

- **Availability:** There is adequate market supply in terms of volume and number of providers of private guarantees.

- **Affordability:** Pricing of private guarantees is reasonable and does not prevent or significantly delay the signature of a PPA.

How to fill the table? Select a country in which you are active, based on your perception and market expertise - rank from 1 to 5 the availability and affordability of private guarantees used to reduce the credit risk associated with off-taker default, briefly describe the main limitations in the field of private guarantees.

(If you prefer not to answer, you can select "Next" at the bottom of the page and skip the question.)

	Country	Availability	Affordability	Limitations
1	☐ Austria			500 character(s) maximum
	☐ Belgium			
	☐ Bulgaria			
	☐ Croatia			
	☐ Cyprus			
	☐ Czechia			
	☐ Denmark			
	☐ Estonia			
	☐ Finland			
	☐ France			
	☐ Germany			
	☐ Greece			
	☐ Hungary			
	☐ Ireland			
	☐ Italy	☐ 1	☐ 1	
	☐ Latvia	☐ 2	☐ 2	
	☐ Lithuania	☐ 3	☐ 3	
	☐ Luxembourg	☐ 4	☐ 4	
	☐ Malta	☐ 5	☐ 5	
	☐ Netherlands			
	☐ Poland			
	☐ Portugal			
	☐ Romania			
	☐ Slovakia			
	☐ Slovenia			
	☐ Spain			
	☐ Sweden			
☐ Iceland				
☐ Norway				
☐				

Is there a PPA platform covering the country (or countries) in which you are active?

Background information: Such (private or public) initiative might increase transparency in the PPA market. The specifics of these platforms can vary significantly - some offer standardised PPAs, while others simply serve as marketplaces to advertise the willingness to enter PPAs. Moreover, these initiatives can be complemented by other regulatory tools, such as demand pooling and state-backed guarantees.

The table below gives the possibility to share information on PPA platforms for each country in which you are active.

How to fill the table? Write the name of a platform in a country (or countries) in which you are active, share a link (if available), select if the initiative is private or public, list the countries in which the platform is available and provide a brief description.

(If you are not aware of a PPA platform covering the country/countries in which you are active, or if you prefer not to answer, you can select “Next” at the bottom of the page and skip the question.)

	Name of the platform	Link	Private/Public initiative	Countries where the platform is available	Brief description

1	50 character(s) maximum The HENEX PPA Platform	100 character(s) maximum	Public	Austria Belgium Bulgaria Croatia Cyprus Czechia Denmark Estonia Finland France Germany Greece Hungary Ireland Italy Latvia Lithuania Luxembourg Malta Netherlands Poland Portugal Romania Slovakia Slovenia Spain Sweden Iceland	500 character(s) maximum
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Support schemes, in the form of Contracts for Difference (i.e. CfDs).

Interaction with PPAs.

Are there support schemes, in the form of CfDs (i.e. Contracts for Difference), in the country (or countries) in which you are active? If so, are such support schemes designed in a way to be compatible with PPAs?

Background information: Contracts for Difference (CfDs) can be used as support schemes to drive investment in new renewable energy assets. Some of these schemes are designed to allow for a degree of compatibility with PPAs - for example, by requiring a PPA to be eligible for the CfD or through carve-out mechanisms. Support schemes should not hamper the development of the PPA market; instead, they should incentivise the private sector to drive the investments necessary for the green energy transition.

The table below gives the possibility to share information on support schemes, in the form of Contracts for Difference (i.e. CfDs), and the interaction with PPAs. For each country in which you are active, you are invited to share information on the availability of support schemes, in the form of Contracts for Difference (i.e. CfDs), and its degree of compatibility with PPAs.

How to fill the table? Select a country in which you are active, select if the initiative is available or not, provide details on the compatibility between CfDs and PPAs (if any).

(If you prefer not to answer, you can select “Next” at the bottom of the page and skip the question.)

	Country	Availability	Is the CfD designed in a way to be compatible with PPAs?	If yes, please provide additional details
1	Greece	Yes	Yes	<i>500 character(s) maximum</i> Contracts for Difference (CfDs) were designed as long term contractual arrangements with the State, under which producers receive fixed-price remuneration, typically within the framework of state aid schemes, and function as a competing mechanism to Power Purchase Agreements (PPAs).
2	☐ Austria ☐ Belgium ☐ Bulgaria ☐ Croatia ☐ Cyprus ☐ Czechia ☐ Denmark ☐ Estonia ☐ Finland ☐ France ☐ Germany ☒ Greece ☐ Hungary ☐ Ireland ☐ Italy ☐ Latvia ☐ Lithuania ☐ Luxembourg ☐ Malta ☐ Netherlands ☐ Poland ☐ Portugal ☐ Romania	☐ Yes ☐ No ☐ Prefer not to answer	☐ Yes ☐ No	<i>500 character(s) maximum</i>

What improvements would you suggest to the design of a CfD to make it more compatible with PPAs?

Tax incentives

Are there tax incentives for PPAs in the country (or countries) in which you are active? If so, what are the main advantages and limitations?

The table below gives the possibility to share information on tax incentives for PPAs.

How to fill the table? Select a country in which you are active, select if the initiative is available or not, share a link (if available), provide a brief description and main advantages and limitations.

(If you prefer not to answer, you can select “Next” at the bottom of the page and skip the question.)

	Country	Availability	Link	Brief description	Advantages	Limitations
1	Greece	No	100 character(s) maximum	500 character(s) maximum	500 character(s) maximum	500 character(s) maximum
2	Austria Belgium Bulgaria Croatia Cyprus Czechia Denmark Estonia Finland France Germany Greece Hungary Ireland Italy Latvia Lithuania Luxembourg Malta Netherlands Poland Portugal Romania Slovakia Slovenia Spain Sweden Iceland					

Guarantees of Origin (i.e. GoOs)

Based on your expertise and understanding, are the GoOs usually included in the PPA (offered by the seller) or do they need to be procured as a separate product?

- ☒ Usually included in the PPA
- ☐ Need to be procured as a separate product

If you wish, you may provide additional context to explain your response

500 character(s) maximum

Based on your expertise and understanding, are PPAs mainly used as a price hedging tool or as a decarbonisation instrument (validated by GoOs)?

- ☒ Price hedging tool
- ☐ Decarbonisation instrument

If you wish, you may provide additional context to explain your response

500 character(s) maximum

International reporting standards for carbon accounting

To what extent are international reporting standards for carbon accounting important for energy consumers in the country (or countries) in which you are active?

Please rate the level of importance of international reporting standards for carbon accounting for energy consumers (i.e. the degree to which international carbon accounting and reporting standards shape, guide, or materially influence an energy consumer's decision to sign a PPA) on a scale from 1 to 5, where:

1 = Very low importance

2 = Low importance

3 = Moderate importance

4 = Strong importance

5 = Very strong importance

- ☐ 1
- ☐ 2
- ☐ 3
- ☐ 4
- ☒ 5

If you wish, you may provide additional comments to explain your assessment.

500 character(s) maximum

The Greenhouse Gas Protocol is a voluntary scheme for reporting market-based emissions accounting. The protocol is directly referenced in the European Sustainability Reporting Directive (CSRD). It is currently under review.

What impact would stricter criteria, such as requiring hourly matching of electricity use and sourcing energy within the same local market (i.e. bidding zone), have on your ability, or appetite, to sign renewable energy PPAs in the countries where you operate?

Please rate the level of importance of international reporting standards for carbon accounting for energy consumers (i.e. the degree to which international carbon accounting and reporting standards shape, guide, or materially influence an energy consumer's decision to sign a PPA) on a scale from 1 to 5, where:

1 = Very low importance

2 = Low importance

3 = Moderate importance

4 = Strong importance

5 = Very strong importance

- ☐ 1
- ☒ 2
- ☐ 3
- ☐ 4
- ☐ 5

If you wish, you may provide additional comments to explain your assessment.

500 character(s) maximum

Forward market liquidity and hedging

Do you have access to a liquid market for standardised forward/futures products?

The table below gives the possibility to share information on market liquidity for standardised forward/futures products.

How to fill the table? Select a country in which you are active, rate the level of liquidity of forward/future market for the selected country, provide a general comment.

	Country	Liquid market for forward/futures products	Comment
1	Greece	Low liquidity	500 character(s) maximum
2	☐ Austria ☐ Belgium ☐ Bulgaria ☐ Croatia ☐ Cyprus ☐ Czechia ☐ Denmark ☐ Estonia ☐ Finland ☐ France ☐ Germany ☐ Greece ☐ Hungary ☐ Ireland ☐ Italy ☐ Latvia ☐ Lithuania ☐ Luxembourg ☐ Malta ☐ Netherlands ☐ Poland ☐ Portugal ☐ Romania ☐ Slovakia ☐ Slovenia ☐ Spain ☐ Sweden ☐ Iceland	☐ Low liquidity ☐ Semi-liquid ☐ Liquid	500 character(s) maximum

Do you have access to a liquid market for non-standardised contracts, such as PPAs?

The table below gives the possibility to share information on market liquidity for non-standardised contracts, such as PPAs

How to fill the table? Select a country in which you are active, rate the level of liquidity of the market for non-standardised contracts (such as PPAs) for the selected country, provide a general comment.

	Country	Liquid market for non-standardised contracts	Comment
1	Greece	Low liquidity	<i>500 character(s) maximum</i>
2	☐ Austria ☐ Belgium ☐ Bulgaria ☐ Croatia ☐ Cyprus ☐ Czechia ☐ Denmark ☐ Estonia ☐ Finland ☐ France ☐ Germany ☐ Greece ☐ Hungary ☐ Ireland ☐ Italy ☐ Latvia ☐ Lithuania ☐ Luxembourg ☐ Malta ☐ Netherlands ☐ Poland ☐ Portugal ☐ Romania ☐ Slovakia ☐ Slovenia ☐ Spain ☐ Sweden ☐ Iceland	☐ Low liquidity ☐ Semi-liquid ☐ Liquid	<i>500 character(s) maximum</i>

Challenges and ways to improve the availability of PPAs

Do you see a link between high renewable build-out and the availability of PPAs in the market(s) in which you are active?

500 character(s) maximum

Which regulatory costs and aspects of the regulatory framework have the greatest impact on the appetite and ability to sign PPAs?

500 character(s) maximum

The pace of renewable energy (RES), BESS and hybrid project deployment is increasingly constrained by structural bottlenecks. Lengthy and fragmented permitting procedures, grid saturation, insufficient transparency regarding available connection capacity and Guarantees of Origin treatment create substantial uncertainty for investors.

What are the most important challenges to improving the availability of PPAs in the market(s) in which you are active?

750 character(s) maximum

The biggest obstacle preventing from signing PPAs lies remains in the cost and risk of matching variable RES production , namely shaping/ firming cost, as well as energy curtailments. Despite being widely identified, including by the European Commission and industry stakeholders, the issue of shaping cost remains insufficiently addressed in current policy frameworks. To safeguard European competitiveness and increase electricity consumption (by minimizing curtailments), Member States should be able to introduce targeted support instruments that directly reduce profiling costs for off takers and support the uptake of renewable electricity.

Confidentiality question

* Does your response contain confidential information?

- ☐ Yes.
- ☒ No.

Contact

[Contact Form](#)