# Position Paper on **Grid Connections**

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energy storage europe association

# Position Paper on Grid Connections

## Executive Summary

Europe's grid connection frameworks are essential for the energy transition. Nevertheless, connection queues have reached unprecedented levels, with over 1,700 GW of projects waiting across Europe, risking significant renewable energy curtailment and slowing electrification.

Energy storage has unique system value potential — particularly by adding flexibility and dispatchability — while also reducing renewable curtailment, relieving congestion, and making better use of existing grid infrastructure. Yet current connection processes do not fully recognise or capture this value for the grid.

Reform of connection procedures is needed to:

- **Unlock capacity held by stalled or speculative projects** through transparent, milestone-based queue management.
- **Establish priority lanes for storage** and other high-value projects that contribute to needed system flexibility.
- **Integrate Flexible Connection Agreements (FCAs)** that help connect more assets in congested grids, but they must be designed with proportionate conditions.
- **Mandate transparent and regularly updated hosting capacity maps** from TSOs and DSOs to guide investment and improve system planning.

This paper does not advocate reopening EU legislative files. However, if files such as the Electricity Directive or Electricity Regulation are revised in the future, the review should integrate the recommendations outlined here to ensure that grid connection rules fully enable Europe's energy transition.

## Focus: The Questions this Paper Aims to Answer

1. How to reform grid connections to accelerate the integration of flexible assets, such as energy storage?
2. How to design Flexible Connection Agreements to reduce curtailment?
3. What role can capacity maps play in future-proofing the electricity network?

## Context: No Connection, No Transition: Why Europe Must Prioritise Grid Access Reform

**Climate Targets and Electrification.** The European Union (EU) has committed to reaching net-zero greenhouse gas emissions by 2050, as enshrined in the European Climate Law. To achieve this target, Member States will reduce reliance on expensive and polluting fossil fuels, increase electrification, and transition from fully centralised to more decentralised generation systems driven by Renewable Energy Sources (RES). This necessitates significant investments and the development of the electricity grid.

**Limited Grid Capacity Availability.** As part of the energy transition, an increasing number of decentralised assets, such as solar panels, wind turbines, and energy storage systems, are seeking grid connection to support the shift to renewables. At the same time, growing demand from new consumption sites and from consumers electrifying heating, transport, and industry is further increasing connection needs. This surge in connection requests is straining grid capacity, creating significant delays in connection queues that can extend from months to years.

**A Bygone Network.** More than 50% of the European grid has been in operation for over 20 years. This grid was not designed to support the energy transition and does not incentivise assets, such as energy storage, which has the potential both to enhance grid efficiency and to avoid those network investments that are ineffective.

**An Inefficient Grid Connection Approach.** The first-come-first-served principle prioritises applications by order, not readiness or system value, leading to speculative projects, locking up 1,700 GW of renewable and hybrid projects across 16 Member States and Great Britain. This inefficiency delays European electrification and the energy transition.

**The Value of Energy Storage.** Energy storage has the potential to enhance network functionality by enabling more consumers and producers to connect to the grid, while reducing renewable energy curtailment. Developing a framework in line with EU and national energy strategies where flexible assets such as energy storage can have a priority connection to the grid is key for a secure, affordable, and reliable European electricity grid.

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# 1. Reform the First-Come-First-Served Principle

A conservative estimate suggests that as of 2024-2025, there were 1,700 GW of renewable energy and hybrid projects waiting for grid connections across 16 EU Member States + Great Britain. These projects represent infrastructure investments that are being held back and hamper Europe's economic growth.

Meanwhile, up to 310 TWh of renewable energy could be curtailed annually by 2040 due to insufficient grid capacity – i.e. energy that has been generated but cannot be used because of grid bottlenecks or lack of demand at the time of generation.[1] This would have translated to an annual economic cost of more than €22.9 billion in 2024 wholesale electricity prices.[2]

**Lowering redispatch costs in Germany**

A modelling study in Germany for quarter-hourly modelling for two congested areas (Schleswig-Holstein and Bavaria, 2023–24) suggests that large batteries can lower redispatch costs by charging during local surpluses and discharging when and where the grid needs relief.

Under today's single-price market (no local signal), the study's modelled net savings for grid operators are modest—about €3–6 per kW of installed storage per year. If a targeted location-based redispatch price signal is introduced, battery operation aligns much better with bottlenecks and the modelled savings rise even further.

*The modelling study does not assess long-term structural solutions to resolve congestion, nor does it compare investments in Battery Energy Storage Systems (BESS) versus grid reinforcement in terms of overall system cost. Instead, it quantifies the additional value that storage can deliver in situations where congestion remains—i.e. where grid reinforcement is not yet available or sufficient—and shows that this value becomes higher when storage responds to an appropriate redispatch-related price signal.*

## 1.1 Unlock Connection Capacity Held by Stalled or Inactive Projects

Speculative projects in the grid connection queue distort the visibility of the actual available grid capacity at both transmission and distribution levels. Stalled projects are those that remain in the connection queue without making meaningful progress toward connecting to the grid.

**~ >50%**

of reserved capacity goes unused in Slovakia

**~ >70%**

of projects fail to connect in the UK

This is evident when comparing the capacity reserved in the connection queue with the much lower capacity actually connected — for instance, in Slovakia, up to 50% of reserved grid capacity goes unused, blocking viable projects. Many of these projects either stall in the queue or never use the full capacity granted. In the UK, stalled or non-viable projects result in attrition rates of 60-70%, ultimately failing to materialise or connect. As a result, realistically implementable projects are blocked or discouraged from applying, as the declared available capacity (i.e. the nominal and not the finally used capacity) is unreliable—slowing down electrification efforts.

[1] 310 TWh is almost the size of the entire Spanish Day Ahead (DA) market.
[2] This value represents the upper end of the estimated opportunity cost range.

- **National Regulatory Authorities (NRAs) should propose rules that allow System Operators (SOs) the possibility to prioritise the reallocation of grid connection capacity** from projects stalled in development to those at a more advanced stage of readiness within the queue.
- **National Regulatory Authorities (NRAs) should propose rules to System Operators to introduce clear intermediate project development milestones** from projects seeking grid connection — such as securing land rights, obtaining permits, and finalising financing—and deadlines for project development, with the risk of losing grid connection rights if these are not met.
- **System Operators, under the oversight of National Regulatory Authorities, should implement a "use-it-or-lose-it" principle**[3]—for example, after 24–36 months or depending on national specificities.
- **System Operators in coordination with National Regulatory Authorities should require financial guarantees** from projects seeking grid connection in order to discourage speculative applications and ensure that only mature, deliverable projects retain their place in the queue.
    - **The EU should amend Article 31 and Article 42 of the Electricity Directive (EU) 2019/944** to require Distribution System Operators (DSOs) and Transmission System Operators (TSOs) to manage grid connection queues transparently and efficiently, including reallocating capacity from stalled to advanced projects, implementing milestone-based progress tracking with time-bound deadlines, and allowing the use of performance/financial guarantees to deter speculative applications.
    - **The EU should introduce a new Guideline on Grid Connection & Queue Management under Articles 58–61 of the Electricity Regulation (EU) 2019/943,** mandating EU-wide principles for connection procedures, including "use-it-or-lose-it" rules.
- **National Regulatory Authorities should define tailored exemptions** so that reallocation and "use-it-or-lose-it" rules do not apply when delays arise from factors beyond the project owner's control (e.g., force majeure, pending judicial appeals, disputes in permitting procedures, lack of competency/staffing issues at local authorities, TSO/DSO-caused delays, supply-chain disruptions).

## 1.2 Make Co-Location, Cable Pooling and Hybrid Grid Connection Points Available for Projects

Currently, many EU and national regulatory frameworks do not allow or clearly define the use of co-location,[4] cable pooling[5] or hybrid grid connection[6] points or, when allowed, such schemes may introduce additional barriers—such as double charging of grid fees—that discourage their deployment.[7]

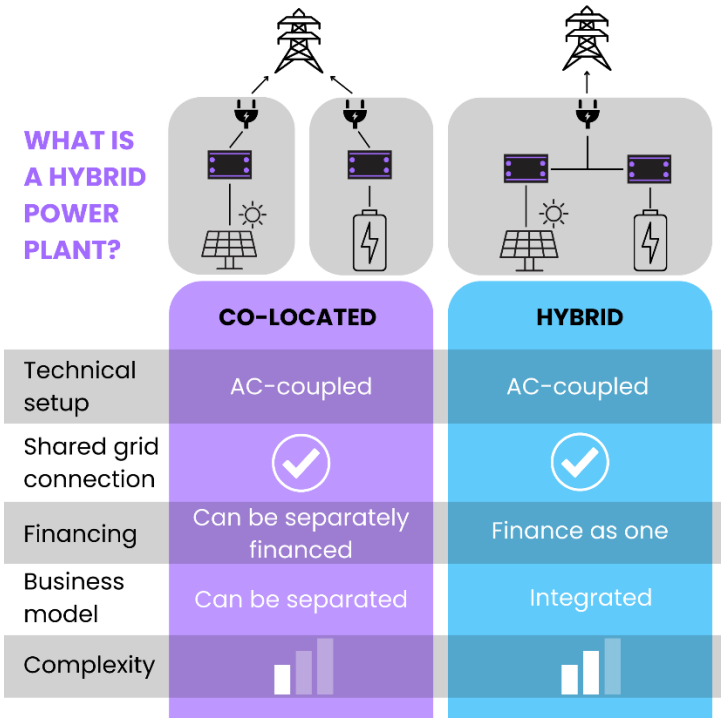
[3] The use-it-or-lose-it principle refers to a grid connection queue management policy that requires project developers to demonstrate progress toward predefined milestones (e.g., securing permits, financing, or construction deadlines) within a reasonable timeframe. Failure to meet these milestones results in the forfeiture of allocated grid connection capacity, which is then reallocated to other viable projects in the queue. This approach aims to prevent speculative or stalled projects from blocking grid access, while allowing flexibility for delays caused by external factors, such as force majeure or supply chain disruptions.

[4] Co-location refers to the placement of multiple energy assets (e.g., solar, wind, storage) at the same locations, sharing infrastructure and the grid connection point.

[5] Cable pooling enables multiple energy assets (e.g., solar, wind, storage) to share the same physical connection/cable to the grid, mainly to optimise infrastructure use and cut connection costs. The assets can remain operationally and commercially separate (often separate metering, contracts, and even different owners/BRPs), with no requirement for coordinated dispatch beyond the shared capacity limit.

[6] A hybrid grid connection point integrates multiple technologies (e.g., renewables + storage) as a single, coordinated installation behind one connection, usually with one operator/SPV, unified control, and a single connection/market unit. The goal is operational co-optimisation (e.g., storage smoothing renewable output) to enhance flexibility and provide system services, not just share infrastructure.

[7] See here for more information on the issue of double charging: https://energystorageeurope.eu/publication/grid-fees-and-network-tariffs/




*Source: Graphic based on https://www.camopo.com/co-location-vs-hybrid-is-the-future-of-power-plants-a-battle-of-business-models/*

This regulatory gap prevents multiple technologies—such as renewable generation and energy storage, or flexible demand paired with storage—from being combined behind a single connection point, even when this would not negatively impact the overall grid capacity. As a result, valuable grid capacity remains underutilised, and projects face prolonged delays in grid connection approvals, extended permitting processes, and increased development timelines. This limits the ability of project developers to optimise the use of existing grid network infrastructure.

- **Member States should update their regulatory frameworks to explicitly incorporate and define provisions for cable pooling, co-located, and hybrid grid connections**, thereby streamlining grid connection queues and optimizing infrastructure use.
    - **The EU should amend Article 31 and Article 42 of the Electricity Directive (EU) 2019/944** to explicitly permit and regulate shared grid connections (e.g., cable pooling, hybrid projects).
- **Energy storage operators should be able to modify existing connections** (e.g., to add flexibility services or integrate renewable energy in hybrid projects) without requiring a full re-application, provided the changes do not significantly increase grid capacity needs.[8]
    - **The EU should amend Article 31 and Article 42 of the Electricity Directive (EU) 2019/944, and Article 59** for NRA oversight, to provide clear, objective and non-discriminatory rules for relocation or modification of energy storage connections.
    - **The EU should amend Article 18 of the Electricity Regulation (EU) 2019/943** to require transparent, cost-reflective connection charges for relocated or modified projects, while limiting fees that create barriers.

[8] Modifications should be categorised as minor (e.g., updating metering or software for flexibility) or major (e.g., increasing capacity significantly). Minor changes and limited capacity increases for hybrid projects (e.g., adding solar to a storage system) should face simplified/fast-tracked administrative processes to reduce delays and costs.

- **A harmonised EU-level definition of "Energy Storage Operator" is essential** to ensure consistent regulatory treatment across Member States. Such a definition would clarify the role, rights, and obligations of storage operators within grid-connection frameworks, distinguish them from generators or consumers, and reduce legal uncertainty when modifying or sharing grid connection points.
    - **The EU should amend Article 2 of the Electricity Directive (EU) 2019/944** to include a harmonised definition of "Energy Storage Operator".

## 1.3 Reform Queue Processes and Create Priority Lanes

Current EU grid connection queue processes typically do not differentiate between project types or consider the specific benefits and behaviours different technologies bring to the energy system. Energy storage, for example, has the potential to offer unique system value potential by providing flexibility, reducing curtailment, and supporting grid stability.

Yet, high-value projects like storage are often delayed behind slower-moving or less impactful ones, undermining storage's potential to support the energy transition. Without prioritisation mechanisms or differentiated queue management, the connection process may remain inefficient and misaligned with broader decarbonisation, flexibility or security of supply goals.

In several Member States, queue assessments still rely on overly conservative modelling that treats storage as net demand at peak or assumes worst-case dispatch without accounting for redispatch options or operational commitments from storage. This can overstate congestion "caused" by storage, undervalue its Transmission and Distribution deferral potential, and skew public debate.

- **National Regulatory Authorities (NRAs), in coordination with System Operators (SOs) and stakeholders, should ensure that connection queue management reflects project readiness, system impact and contribution to national strategies.** System-supportive projects, such as energy storage, could be prioritised in a transparent, objective and non-discriminatory manner.
    - **The EU should amend Article 31 of the Electricity Directive (EU) 2019/944** to require DSOs to implement transparent and non-discriminatory queue-management rules and extend Article 42 for TSOs accordingly.
- **National Regulatory Authorities should define mandatory project maturity criteria**—such as securing land rights, obtaining permits, and providing financial guarantees—and ensure standardised, milestone-based progress tracking across all grid connection projects.
    - **The EU should amend Article 59 of the** Electricity Directive (EU) 2019/944 so that NRAs approve and oversee queue-management methodologies, including stakeholder-agreed maturity criteria and fast-tracking of advanced projects.
- **National Regulatory Authorities, in coordination with System Operators and stakeholders, should develop, apply and approve a competent and transparent methodology in queue assessments for different assets in priority lanes.** The methodology could consider in national contexts redispatch options, location- and time-dependent effects, national grid development plans and any operating commitments. These assumptions and results should be published and periodically reviewed.
    - **The EU should amend Article 59 of the Electricity Directive (EU) 2019/944** to require NRAs to approve, publish, and periodically review the methodologies used by TSOs/DSOs to assess storage's impact on grid flows and capacity needs for connection and queue decisions.

## Country Examples in Reforming the First-Come-First-Served Principle

**United Kingdom – From "First-Come" to "First Ready and Needed"**

The UK's National Energy System Operator (NESO) began in 2025 implementing major reforms to speed up grid connections through its Targeted Model Option 4+ (TMO4+) package, approved by NRA Ofgem. The central idea is to shift from a "first-come, first-connected" model to a more strategic "first ready and needed, first connected" approach.

Under the new system, projects must pass through a *Gate 2* filter to secure a firm connection date and location. To qualify, a project must meet two sets of criteria: readiness (e.g. having land rights, progressing in planning approvals) and strategic alignment (e.g. matching future system needs or national energy strategies like the Strategic Spatial Energy Plan). Projects that fail to meet these thresholds are moved to *Gate 1*, where they remain in a lower-priority, non-binding queue.

The goal of the UK reform is to identify and filter out "zombie" projects—those that hold capacity but are not advancing in the queue. This frees up space for more viable and system-relevant projects, including energy storage. Existing projects that show real progress retain their queue position, offering protection for serious developers.

**Spain – Linking Grid Access to Project Maturity Through Guarantees and Deadlines**

Spain has used financial guarantees to ensure only viable projects apply for grid access. Applicants must deposit €40/kW for demand and generation projects (or €20/kW for storage). In 2020, Spain strengthened this system by introducing strict administrative milestones tied to connection permits: developers must meet deadlines for planning, environmental approvals, and commissioning. If they fail, the permit is automatically cancelled and the guarantee is forfeited.

Recent reforms under Royal Decree-Law 7/2025 tightened the rules. For example, storage facilities that absorb power from the grid must now submit additional guarantees to the national authorities. Additional criteria were introduced to avoid speculative behaviour, such as penalising drastic reductions in project size or changes in the business activity classification. These rules also clarify when a revised project counts as a new application versus a non-substantial modification.

However, Spain's experience also illustrates the regulatory complexities that can emerge as hybridisation and co-location of storage assets accelerate. Ambiguities around the double imposition of financial guarantees for hybrid projects highlighted the importance of ensuring regulatory clarity, consistency, and simplicity when designing such frameworks.

By combining economic guarantees, milestone-based enforcement and transparent mapping of grid connection capacity as well as renewable congestion, Spain ensures that only well-prepared and viable projects remain in the queue. This prevents capacity hoarding, lessens the administrative backlog of the system operator revision queue and improves the reliability of available capacity figures.

**Romania – Prioritising Mature Projects and Discouraging Speculation**

Romania has adopted a comprehensive reform of its grid connection framework. The new rules, issued by the national regulator ANRE, aim to improve the efficiency and fairness of the connection process by prioritising technically and financially mature projects and limiting speculative development.

Under the new system, only fully documented and advanced projects will be allowed into the connection queue. Developers must meet strict deadlines, provide binding financial guarantees, and follow a structured, deadline-driven process. Delays in meeting key milestones can result in the forfeiture of financial guarantees or loss of access rights.

## 1.4 Ease Administrative Burden and Improve Staffing Competency

Many Member States face a shortage of qualified staff within regulatory authorities, permitting bodies, and system operators, which slows down grid connection procedures and creates administrative bottlenecks. In addition to staffing gaps, there is often insufficient technical knowledge and experience with newer technologies like energy storage. This can lead to delays, inconsistent decision-making, and cautious approaches to approving innovative or flexible projects like energy storage. Administrative burden should not hinder storage in its flexibility and value stacking potential if no major impact on grid operations/capacity increases is expected. Enhancing the knowledge and technical capacity of competent authorities on existing and emerging energy storage technologies is essential to ensure efficient and well-informed grid connection procedures.

- **National Regulatory Authorities should introduce deadlines for System Operators in answering to grid connection requests**. Applications may be deemed approved (or denied) if no decision is made by the System Operators within a set timeframe, to accelerate administrative decisions.
    - **The EU should amend Article 59 of the Electricity Directive (EU) 2019/944** to introduce a principle, whereby grid-connection applications are deemed approved/denied if the NRA-set maximum time period is exceeded.
- **Member States should leverage the EU-funded Technical Support Instrument (TSI**) to provide targeted training and capacity-building programs for regulatory authorities, permitting bodies, and system operators, enhancing their expertise in innovative technologies like energy storage.

# 2. Make Flexible Connection Agreements Fit-for-Purpose

Flexible Connection Agreements (FCAs), introduced in the Electricity Directive (EU) 2019/944, allow grid users—such as storage or renewables—to connect to the grid under non-firm terms, enabling access to congested networks in exchange for accepting curtailment or other operational limitations. The use of such flexibility arrangements should remain targeted to addressing occasional or temporary challenges to grid security or electricity supply (e.g., risks of non-supplied energy or local congestion), rather than serving as a structural substitute for grid reinforcement.[9] However, in practice, some regulatory frameworks may present excessive and rigid operational constraints that effectively block storage from participating in the market.

- **FCAs should be proportionate, technology-neutral, and time-bound**—recognising storage's potential in reducing curtailment and deferring grid upgrades—while avoiding restrictions that remove commercial flexibility. FCAs should be subject to revision if the congestion circumstances of their connection point improve (i.e. due to infrastructural investment).
- **FCAs should not be used as a substitute for market-based redispatch**. Non-firm curtailment within FCA terms is acceptable, but any requests beyond FCA-agreed limits must be remunerated via market mechanisms or, if non-market-based, compensated in line with Article 13(7) of Regulation (EU) 2019/943.[10]
- **FCAs should only be used when market-based flexibility solutions are unavailable**, with clear time limits to prevent overuse. For this reason, regulatory oversight is essential for FCAs. FCAs should be carefully monitored by regulators to ensure they remain a targeted solution, not a standard practice for grid connections.
    - **The EU should amend Article 42(2) of the Electricity Directive (EU) 2019/944** to explicitly allow non-firm/curtailable connection agreements (FCAs) for energy storage; and **amend Article 59** to ensure NRA oversight.

**Country Examples in Making Flexible Connection Agreements**

**Germany – Not so Flexible FCAs for Batteries**

In Germany, battery energy storage projects were offered a flexible connection from a DSO under the condition that it could not discharge into the grid between 7:00 a.m. and 5:00 p.m. year-round—equivalent to over 4,000 hours of restricted operation per year. Additional constraints even dictated the state of charge at specific times of day, effectively removing commercial flexibility, negatively affecting dispatchability and eliminating the business case for the battery energy storage facilities. These types of restrictions are not based on realistic system needs and negatively impact the business case for Battery Energy Storage Systems (BESSs).

[9] The goal for a such FCAs agreements is: (a) to quickly enable a certain connection capacity; and (b) to enable savings on the grid reinforcement costs or the connection charges that would be paid to have full access to the needed capacity. Once the customer is connected, the grid fees paid should be for the effective capacity/energy delivered as for any other customer connected to the grid.

[10] Under Article 13(7) of Regulation (EU) 2019/943, when non-market-based redispatching is used, the SO must provide financial compensation to the operator of the redispatched generation, energy storage or demand response unit

# 3. Future-proofing Capacity Maps and Transparency

A key enabler for better use of existing grid infrastructure is clear visibility on where capacity is available—and where storage can add the most value.[11] Regularly updated hosting capacity maps, published by DSOs and TSOs, has as a goal to show available grid capacity across voltage levels and geographies, while also reflecting planned future reinforcements.

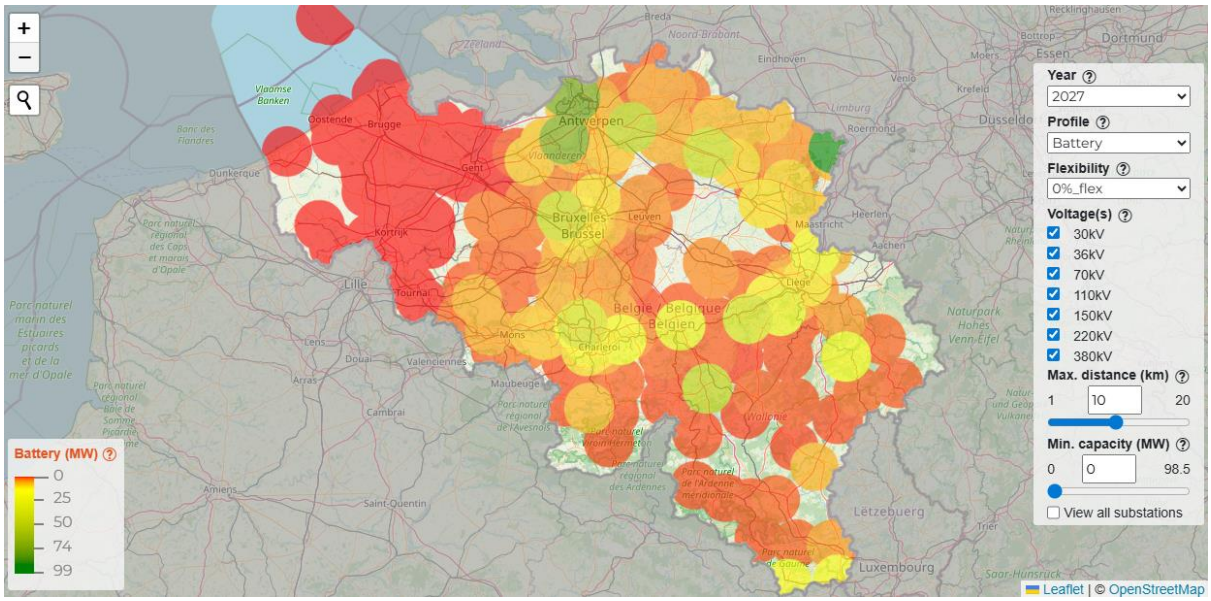
For storage developers, such visibility is essential. It allows them to identify areas where their assets are most needed—for example, to relieve congestion, provide system flexibility, or absorb excess renewable generation. This would also help reduce speculative or misaligned connection requests, alleviate the administrative burden on grid operators by minimizing unviable applications that add to their workload, and allow system operators to better guide investment.

- **Transmission System Operators (TSOs) and Distribution System Operators (DSOs), under the oversight of National Regulatory Authorities (NRAs) and the coordination of EU institutions, should publish regularly updated and transparent hosting-capacity maps—**covering storage, generation and demand capacity, including firm and non-firm connections—at both transmission and distribution levels. These maps should display available grid capacity, planned reinforcements, and existing system constraints.
- **TSOs and DSOs should update these maps with sufficient frequency—**for example, at least monthly, as required under Spanish regulation[1]—and make them publicly available through online portals to ensure timely, reliable information for market participants**.**
- **TSOs and DSOs should also include forecasts of future available capacities across different voltage levels and substations**. In addition, capacity maps should present key system-needs indicators—such as inertia requirements, short-circuit power, and voltage-support needs—to help developers align project design with grid-stability objectives and support more efficient system planning.
- **National Regulatory Authorities should require TSOs and DSOs to map and publish Renewable Energy Sources (RES) curtailment levels and congestion-relief zones,** allowing investors to identify where storage can add the most value and enabling regulators to monitor and quantify curtailment across the EU.
- **The European Commission, in cooperation with ENTSO-E and ACER, should develop a dedicated capacity-map for energy storage,** integrating national hosting-capacity data and long-term network development plans to guide investors and support coordinated deployment across Member States.
    - **Amend Article 32(3) of the Electricity Directive (EU) 2019/944 to require DSOs and Article 51 of Directive (EU) 2019/944** to require TSOs to publish detailed hosting-capacity maps and forecasts as part of their network development plans, with regular (e.g. monthly) updates, harmonised formats and inclusion of RES curtailment data where applicable.

[11] https://www.raponline.org/wp-content/uploads/2024/10/RAP-ERRA-Power-grid-report-October-2024.pdf

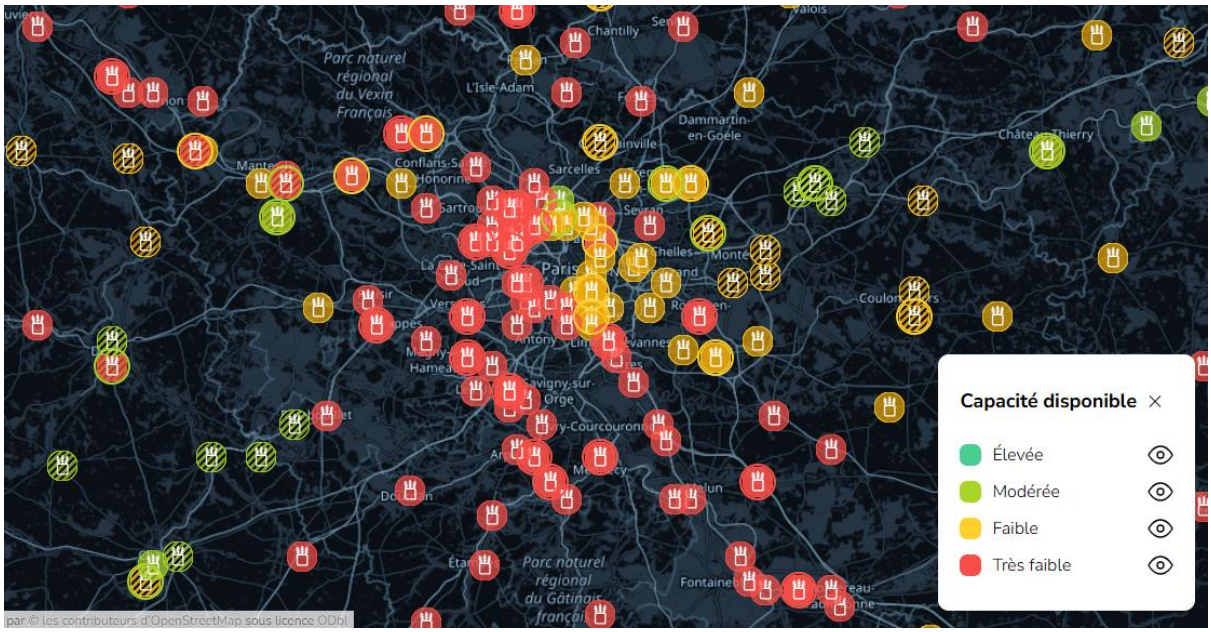
# Country examples

### Belgium TSO Elia




The Belgian TSO Elia shows publicly where future (e.g. in 2027 or 2031) capacities are available, specifically for batteries Source: https://www.elia.be/en/customers/connection/grid-hosting-capacity

### French TSO RTE




The French TSO RTE shows publicly the available grid capacity for batteries. On their map, green indicates high availability, light green means moderate, yellow shows low, and red indicates very limited capacity. Source: https://analysesetdonnees.rte-france.com/reseaux/cartostock

# 4. Conclusion

The energy transition cannot succeed without timely and efficient grid connections. Current practices — from congested queues to fragmented transparency — delay the deployment of industry decarbonisation, renewable energy and storage, increase curtailment, and drive up costs for consumers.

Incentivising and accelerating the integration of energy storage into grid connection frameworks would unlock its full system value and support a more flexible, efficient, and resilient European electricity system.

We call on EU institutions, national regulators, and system operators to act now to modernise grid connection rules. While this paper does not advocate for reopening EU legislative files, if future revisions take place, they should incorporate the recommendations set out here to ensure that grid connection frameworks become an enabler — not a barrier — to Europe's energy transition.

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About the Energy Storage Europe Association:

The Energy Storage Europe Association is the leading member-supported association representing organisations active across the entire energy storage value chain. The Association supports the deployment of energy storage to further the cost-effective transition to a resilient, carbon-neutral, and secure energy system. Together, Energy Storage Europe Association members have significant expertise across all major storage technologies and applications. This allows us to generate new ideas and policy recommendations that are essential to build a regulatory framework that is supportive of storage.

For more information, please visit www.energystorageeurope.eu

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Disclaimer:

This content was elaborated by the Energy Storage Europe Association and reflects a consolidated view of its members from an energy storage point of view. Individual Energy Storage Europe Association members may adopt different positions on certain topics from their corporate standpoint.

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The Unified Voice of Energy Storage