

**Priority question for written answer P-000712/2024  
to the Commission**  
Rule 138  
**Jerzy Buzek (PPE)**

Subject: Interpretative doubts regarding the climate neutrality plans (CNPs) in the Emissions Trading System (ETS) Directive

The cost of the energy transition in the Polish district heating sector is estimated at up to EUR 95 billion. Therefore, the additional free emission allowances that companies can obtain after developing CNPs in accordance with the ETS Directive offer a crucial opportunity. Polish companies are currently working on these CNPs. However, there are interpretive doubts that require clarification:

1. Will additional free CO<sub>2</sub> allowances be counted as 30 % of the total amount of benchmarked allowances, bringing the potential amount of free allowances for district heating networks operated in specific Member States to 60 %, and will the quantity of free allocations be accounted based on the entire 4th period of the ETS (2021-2030), or only on its 2nd half (2026-2030)?
2. Can projects that have been commissioned and put into operation recently (2023-2026) be included in the CNPs, and can such projects meet the condition of allocating the value of the additional allocation of free allowances for investments?
3. If the operator of an installation has carried out the investment, resulting in decreased capacity below 20MWth and the installation exit from the ETS to be included under the ETS2 from 2028, can the installation submit a CNP and receive additional free allowances?

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