Energy Law Briefing: Special Edition

Law 5299/2026: Accelerating the Energy Transition – Greece's New Regulatory Framework for Renewable Energy Acceleration Areas

A. **Designation of Renewable Energy Acceleration Areas (REAAs)**
B. **Exemption from Environmental Licensing**
C. **Implementation Timelines for Licensing Milestones of RES in REAAs**
D. **Key Takeaways**

The new Law 5299/2026 issued on 5 May 2026[1], in its Part A, aims to accelerate the energy transition by increasing the share of Renewable Energy Sources (**RES**) in gross final energy consumption by 2030 and strengthening the gradual phase-out of fossil fuels.

It also seeks to enhance cooperation between EU member states in the field of renewable energy, simplify and expedite administrative permitting procedures for RES projects through the introduction of binding deadlines and the designation of acceleration areas, promote innovative technologies and flexibility services and expand the framework for the management of guarantees of origin.

These objectives are implemented, inter alia, through the incorporation of:

a. RED III (Directive (EU) 2023/2413 of the European Parliament and of the Council of 18 October 2023); and
b. certain provisions of Directive 2024/1788 of the European Parliament and of the Council of 13 June 2024.

Against this background, this Briefing focuses on the new regulatory framework governing Renewable Energy Acceleration Areas (**REAAs**), recognizing its potential impact on growing RES

[1] Government Gazette A'/67/05.05.2026.

penetration.

A. Designation of Renewable Energy Acceleration Areas (REAAs)

REAAs are specific geographic zones designated for the accelerated installation of renewable energy projects and their associated infrastructure, including grid connection, storage facilities and any other systems required for the integration of such projects into the energy network. These areas are not suitable for agricultural use and will be drawn as a subset of the broader areas identified and mapped in a Ministerial Decision issued by the Minister of Environment and Energy (the **Ministerial Decision**)[2]. This sets out the areas necessary for the development of photovoltaic (**PV**) and onshore wind projects (**WPs**) in order to achieve the quantitative targets for renewable energy penetration established under the National Energy and Climate Plan (**NECP**) for 2030 and 2050. These areas are located outside:

a. protected Natura 2000 Network areas and areas designated under national conservation programs for the protection of nature and biodiversity, as well as major migratory routes for birds and marine mammals, excluding artificial and built surfaces within such areas, such as rooftops, parking areas or transport infrastructure; and
b. areas where the development of specific categories or technologies of renewable energy projects is expected to have a significant environmental impact[3].

REAAs may be designated by virtue of a decision of the Minister of Environment and Energy, following a recommendation by the General Secretariat for Spatial Planning and Urban Environment and the preparation of a Strategic Environmental Impact Assessment (**SEIA**). Under the Ministerial Decision, the terms and conditions governing the development of RES and their associated infrastructure are established. It also sets out guidelines, requirements and mitigation measures to safeguard the environment and provides for the granting of licensing incentives or other non-financial incentives to RES projects installed within the designated REAAs.

B. Exemption from Environmental Licensing

RES projects installed within these areas are in principle exempted from environmental permitting procedures and the obligation to conduct a special ecological assessment. For Category A projects, developers must first apply to the competent environmental authority requesting an exemption, providing relevant project details and demonstrating compliance with the applicable

[2] Ministerial Decision No. ΥΠΕΝ/ΔΑΠΕΕΚ/144627/3247/2025 (Government Gazette B' 7365) issued pursuant to paragraph 18 of Article 33 of Law 4936/2022.
[3] In accordance with Joint Ministerial Decision No. ΥΠΕΧΩΔΕ/ΕΥΠΕ/οικ.107017/28.8.2006 (Government Gazette B' 1225).

rules of the REAA.

The relevant authority reviews the application within 30 days (or 20 days for repowering projects). If no significant environmental impact is expected, an exemption certificate is issued. Otherwise, a reasoned decision may require the project to undergo environmental permitting, which is then carried out on a priority basis within set deadlines (generally 4–12 months from a complete application, depending on the project category).

Additionally, projects may still be subject to environmental permitting if they are likely to have a significant cross-border environmental impact or upon request by another affected Member State.

C. Implementation Timelines for Licensing Milestones of RES in REAAs

A key feature of the new framework is the introduction of binding implementation timelines governing the key licensing milestones for RES projects, both within and outside REAAs. Importantly, these deadlines do not operate in a single direction: certain time limits are imposed on the competent administrative authorities and grid operators, such as the deadlines for issuing Producer Certificates, Grid Connection Offers and Installation Licenses, while others fall on the project developer, including the obligation to submit additional documentation within prescribed periods.

The tables below set out these timelines in detail, distinguishing between the various procedures and milestones applicable to different project categories and technologies. Where projects are located within REAAs, the deadlines are generally shorter, reflecting the policy objective of accelerated deployment in those designated zones. For projects outside REAAs, longer but still binding maximum durations apply, with the possibility of limited extensions in certain cases.

a. All RES Technologies

Procedure / Milestone	Timeline
Issuance of Producer Certificate / decision	Within 10 days from the expiry of objection period
Request for additional documents by Grid Operator	Within 20 days from application for a Grid Connection Offer (GCO)
Submission of additional documents by applicant	Minimum 20 days from a relevant notification by the grid operator
Issuance of Grid Connection Offer (GCO)	Within 30 days after completeness of file

Conclusion of Grid Connection Agreement (main agreement)	Within 30 days from relevant application
Conclusion of Grid Connection Agreement (supplement, if applicable)	Within 15 days from relevant application
Conclusion of unified Connection Agreement (if single unified document)	Within 45 days from relevant application
Issuance of Installation License	Within 10 days after file completion
Request for clarifications regarding Installation License	Within 20 days from application
Conclusion for Operating Aid Agreement/Direct Market Participation Certificate issued by DAPEEP	Within 5 days from relevant application

b. Small-scale RES (≤150 kW)

Procedure / Milestone	Timeline
Grid Connection Offer (GCO)	Within 30 days from application
Grid Connection Agreement (single document)	Within 30 days from application
Operating Aid Contract / Market Participation	Within 5 days from application

c. Implementation Timelines for Licensing Milestones of RES Outside REAAs - Exempted Rooftop PVs (Optionally with Storage)

Procedure / Milestone	Timeline
Environmental permitting, licensing, connection, and commissioning (overall implementation deadline)	90 days from submission of the relevant application
Issuance of GCO	30 days from submission of the relevant application
Conclusion of a single unified Grid Connection Agreement	30 days from submission of the relevant application
Conclusion of Operating Aid Agreement/Direct Market Participation Certificate issued by DAPEEP	5 days from submission of the relevant application
Grid Connection by the competent grid operator and issuance of electrification certificate	5 days from submission of the relevant application

d. Implementation Timelines for Licensing Milestones of RES in REAAs

The following time periods are excluded from the calculation of the implementation deadlines:

i. the period during which construction or repowering works relating to the RES project and associated grid infrastructure are carried out;
ii. the duration of administrative procedures required for major grid upgrades; and
iii. any time spent on court proceedings, appeals, or other dispute resolution processes.

RES Category / Project Type	Procedure / Milestone	Implementation Timeline
All RES technologies (incl. exempted projects)	Full licensing and grid connection process (from application for Producer Certificate to issuance of Operation License)	Up to 12 months from submission of application for the issuance of Producer's Certificate to the issuance of the Operation License
Exempted RES projects	From application for environmental licensing to connection and electrification certificate	Up to 12 months from submission of application for the issuance of environmental licensing to the issuance of electrification certificate
Offshore RES projects (if included in REAAs)	Licensing and grid connection process	Up to 24 months from submission of application for the issuance of Producer's Certificate to the issuance of the Operation License
Repowering RES projects	Licensing and grid connection process	Up to 6 months from submission of application for the issuance of the Producer's Certificate to the issuance of the Operation License
Small-scale RES (≤150 kW)	Licensing and grid connection process	Up to 6 months from submission of application for the issuance of environmental licensing to the issuance of electrification certificate
Offshore repowering projects	Licensing and grid connection process	Up to 12 months from submission of application for the issuance of Producer's Certificate to the issuance of the Operation License

e. Implementation Timelines for Licensing Milestones of RES outside REAAs

The following time periods are excluded from the calculation of the implementation deadlines:

i. the period during which construction or repowering of the project is carried out;
ii. the duration of grid connection works and related infrastructure activities;
iii. the duration of administrative procedures required for major grid upgrades; and
iv. any time spent on court proceedings, appeals, or other dispute resolution mechanisms.

RES Category / Project Type	Procedure / Milestone	Maximum Duration of Implementation Timeline	Permitted Extension to Deadline

All RES & CHP technologies (incl. exempted projects)	Licensing and grid connection process (from Producer Certificate application to issuance of Operation License)	Up to 2 years	6 months maximum
Exempted RES & CHP projects	From application for environmental licensing to grid connection and electrification	Up to 2 years	6 months maximum
Offshore RES & CHP projects	Licensing and grid connection process	Up to 3 years	6 months maximum
Small-scale RES & CHP (≤150 kW)	Licensing and grid connection process	Up to 12 months	3 months maximum
Exempted small-scale (≤150 kW)	From application for environmental licensing to grid connection and electrification	Up to 12 months	3 months maximum
Offshore small-scale (≤150 kW)	Licensing and grid connection process	Up to 24 months	3 months maximum
Repowering RES & cogeneration (CHP) (incl. exempted projects)	Full licensing and grid connection process (from application for Producer Certificate to issuance of Operation License)	12 months	3 months maximum
Exempted projects (non-repowering scope)	From application for environmental licensing to connection and electrification certificate	12 months	3 months maximum

D. Key Takeaways

The establishment of REAAs represents a pivotal shift in the regulatory framework governing the licensing of RES projects. By introducing binding licensing timelines, the new regime seeks to remove long-standing bottlenecks and provide greater regulatory certainty to investors and project developers.

At the same time, the framework attempts to balance acceleration with environmental protection, ensuring that the expansion of renewable energy infrastructure proceeds in a manner consistent with biodiversity safeguards and broader sustainability objectives. In this context, the implementation of the new rules will be critical in determining whether the ambitious targets of the energy transition can be met in practice.

Ultimately, the success of the reform will depend not only on the clarity of the legislative provisions, but also on their consistent and effective application by the competent authorities.

In the light of the persistent constraints in the electricity grid and the bottlenecks in the issuance of GCOs, it is not yet clear to what extent these ambitious procedural deadlines will translate into

real-world acceleration of project development. Without a much-needed substantial upgrade of grid infrastructure, there is a legitimate concern that these time limits may, in practice, become largely declaratory in nature rather than enforceable guarantees of faster project implementation.



KEY CONTACTS

Eleni Stazilova
Counsel
estazilova@bernitsaslaw.com



Melina Kolovetsiou
Associate
mkolovetsiou@bernitsaslaw.com

This Briefing is intended to provide general information and is not meant to constitute a comprehensive analysis of the matters set out herein or to be relied upon as legal advice. It is not meant to create a lawyer-client relationship. Legal and other professional advice should be sought before applying any of the information in this Briefing to a specific situation.
Bernitsas Law Firm is a partnership of attorneys regulated by Presidential Decree 81/2005 and Law 4194/2013, as currently in force, with its registered address at 5 Lykavittou Street, Athens 106 72, Greece. If you no longer wish to receive Briefings from us, please click here to Unsubscribe.