

Public Consultation contributions by geography

The main public consultation processes in which the companies of the Iberdrola Group participated in 2024 and early 2025 are detailed below.

Table 1.

Europe			
YEAR	ENTITY	CONSULTATION NAME	PRIMARY CLIMATE POSITION
2024	ACER	Public consultation on amending the electricity price coupling algorithm methodology	Electrification
2024	CE	Unlocking private investment in energy efficiency: guidance for Member States and market players	Electrification
2024	CE	Energy efficiency: assessment of the level of national and EU funding	Electrification
2024	CE	Greening corporate fleets	Electrification
2024	CE	National Emissions Reduction Directive: assessment	Electrification
2024	CE	Block exemption regulation on the application of Articles 93 and 108 of the Treaty to State aid for the land transport sector	Electrification
2024	ENTSO-E	ERAA 2024 Call-for-Evidence on Preliminary Input Data	Electrification
2024	CE	Single Market Programme	Electrification
2024	CE	Climate reporting: Modifying templates to reflect the results of the Target 55 package	Electrification
2024	CE	EU emissions trading system – update of the Verification and Accreditation Regulation	Electrification
2024	CE	Car labelling – evaluation	Electrification
2024	CE	FuelEU Maritime Regulation: Methods and criteria for accrediting verifiers	Electrification
2024	CE	Decarbonizing the Shipping Sector: Model for Standardized Monitoring Plans	Electrification

Europe			
YEAR	ENTITY	CONSULTATION NAME	PRIMARY CLIMATE POSITION
2024	CE	Decarbonizing the Shipping Sector: Verification Activities	Electrification
2024	CE	Batteries for electric vehicles: methodology for the carbon footprint.	Electrification
2024	CE	Electric Vehicle Batteries: Carbon Footprint Methodology	Electrification
2024	CE	Batteries: Carbon footprint declaration format	Electrification
2024	CE	F-gases: Updated F-gas label format	Electrification
2024	CE	F-gas emissions reporting: New format	Electrification
2024	CE	F-gases: Extension of certification requirements for cooling, air conditioning, and heat pumps (RACHP) to include Rankine cycles with organic fluid and mobile cooling units	Electrification
2024	ENTSO-E	Progress Report on Interlinked Modelling (ILM 2024)	Electrification
2024	CE	F-Gases: Amendment to the Operating Rules of the F-Gas Portal	Electrification
2024	ACER	Public consultation on the introduction of voluntary templates for Power Purchase Agreements in the EU energy market	Electrification
2024	CE	Energy efficiency – eco-design requirements for air heating and cooling products (review)	Electrification
2024	CE	Emissions trading system (ETS) Monitoring and Reporting Regulation amendment in response to the ETS revision	Electrification
2024	CE	Determination of CO ₂ emissions and fuel consumption for heavy-duty vehicles – updated rules	Electrification
2024	CE	Emissions trading system (ETS2) – approvals of extensions and corresponding additional allowances	Electrification
2024	CE	Emissions Trading System 2 – approvals of unilateral extensions of its scope and corresponding additional allowances	Electrification

Europe			
YEAR	ENTITY	CONSULTATION NAME	PRIMARY CLIMATE POSITION
2024	CE	Greenhouse gas emissions from offshore ships and zero-rating of sustainable fuels – monitoring and reporting (update)	Electrification
2024	CE	Electricity guideline on forward capacity allocation (revision)	Electrification
2024	CE	EU Reference Scenario 2025 - Stakeholder consultation on technology assumptions	Electrification
2024	ACER	Public consultation on the draft network code on demand response	Electrification
2024	CE	Heavy-duty vehicles - procedures for in-service verification of CO2 emissions	Electrification
2024	ACER	Public consultation on amending the harmonised electricity cross-zonal capacity allocation methodology	Electrification
2024	CE	Methodology to determine the greenhouse gas (GHG) emission savings of low-carbon fuels	Electrification
2024	CE	Emissions trading System 2 (ETS2) - Approvals of scope extensions and corresponding additional allowances	Electrification
2024	CE	Energy efficient buildings – portfolio framework to increase lending for renovations	Electrification
2024	ENTSO-E	Public Consultation on Flexibility Needs Assessment Methodology	Electrification
2024	CE	Standards related to infrastructure for alternative fuels: wireless charging, electric roads, communication between vehicles and networks, hydrogen	Electrification
2024	CE	Aviation fuels & emissions trading – calculating the price difference between eligible fuels and kerosene (detailed rules)	Electrification
2024	CE	EU emissions trading system (ETS) update of Activity Level Changes Regulation	Electrification
2025	CE	Single Market Strategy 2025	Electrification
2025	CEER	CEER Public Consultation on the paper 'Handbook for National Energy Regulators-How to Assess Retail Market Functioning'	Electrification

Europe			
YEAR	ENTITY	CONSULTATION NAME	PRIMARY CLIMATE POSITION
2025	CE	EUSurvey - Study on pathways and policies for accelerating electrification and use of renewables in industry	Electrification
2025	CE	Access to data to change electricity supplier: requirements	Electrification
2025	CE	Industrial Decarbonisation Accelerator Act - speeding up decarbonisation	Electrification
2025	CE	EU emissions trading system for maritime, aviation and stationary installations, and market stability reserve – review	Electrification
2024	ENTSO-E	Pre-consultation on the ENTSO-E Annual Work Programme list of deliverables 2025	Just, affordable and secure energy transition
2024	CE	Social Climate Fund: Guidelines on the application of the "do no significant harm" principle	Just, affordable and secure energy transition
2024	CE	Targeted Consultation on procedure for access to justice in environmental matters in relation to State aid decisions	Just, affordable and secure energy transition
2024	CE	Fitness check – energy security architecture	Just, affordable and secure energy transition
2025	ENTSO-E	ERAA 2025 Call-for-Evidence on Preliminary Input Data - European Network of Transmission System Operators for Electricity - Citizen Space	Just, affordable and secure energy transition
2025	CE	Survey study on consumer pricing in post-crisis retail energy market	Just, affordable and secure energy transition
2025	ENTSO-E	European Resource Adequacy Assessment 2024 Report - European Network of Transmission System Operators for Electricity - Citizen Space	Just, affordable and secure energy transition
2025	CE	Modernisation Fund – first evaluation of the operating rules	Just, affordable and secure energy transition

Europe			
YEAR	ENTITY	CONSULTATION NAME	PRIMARY CLIMATE POSITION
2025	ENTSO-E	Investor Survey: How can ERAA better reflect real investment behaviour? - European Network of Transmission System Operators for Electricity - Citizen Space	Just, affordable and secure energy transition

Table 2.

Spain			
YEAR	ENTITY	CONSULTATION NAME	PRIMARY CLIMATE POSITION
2025	MITECO	Energy savings needs auctions	Electrification
2025	MITECO	Cogeneration auctions	Electrification
2025	MITECO	Program for unique energy savings and efficiency projects, funded by the National Energy Efficiency Fund (FNEE)	Electrification
2025	MITECO	Development of the Social Climate Plan	Electrification
2025	MITECO	Energy audits and the energy services sector	Electrification
2025	MITECO	Call for flexibility and demand management grants with FEDER 2021-2027 funds	Electrification
2025	MITECO	Storage and integration of renewable energy in non-mainland electricity systems	Electrification
2025	MITECO	Regulatory bases for the incentive program for innovative heat pump and other renewable thermal installations co-financed with EU FEDER funds (FEDER 21–27 program)	Electrification
2025	MITECO	Amendment of Royal Decree RD 1027/20007, July 20th, approving the Regulation on Thermal Installations in Buildings (RITE)	Electrification
2025	MITECO	Development of the National Building Renovation Plan	Electrification

Spain			
YEAR	ENTITY	CONSULTATION NAME	PRIMARY CLIMATE POSITION
2024	MITECO	Renewable Energy Economic Regime (REER)	Electrification
2024	MITECO	Grants for Renewable Value Chain projects	Electrification
2024	MITECO	Energy efficiency grants for SMEs and large industrial companies under the National Energy Efficiency Fund	Electrification
2024	MITECO	Investment limits in electricity networks	Electrification
2024	MITECO	Grants for innovative renewable energy projects	Electrification
2024	MITECO	Grants for industrial projects under the Agri-food PERTE and the 2024 call	Electrification
2024	MITECO	Public access charging on roads (MOVES Charging Corridors program)	Electrification
2024	MITECO	Electrification of light vehicle fleets (MOVES FLOTAS PLUS program)	Electrification
2024	MINCOTUR	Industry and Strategic Autonomy Law	Electrification
2024	MTMS	General Road Regulation	Electrification
2024	MITECO	Adjustments to the specific remuneration regime	Electrification
2024	MIVAU	Technical Building Code	Electrification
2024	MITECO	Specific Remuneration Scheme for High-Efficiency Cogeneration Facilities	Electrification
2024	MITECO	Strategic Subsidy Plan of the Ministry for the Ecological Transition and the Demographic Challenge for the 2025–2027 Period	Electrification
2024	MITMA	Strategy to Combat Transport Affordability	Electrification
2024	CNMC	Demand Access and Connection	Electrification
2024	CNMC	Circular 3/2020 on the Methodology for Electricity Network Tariffs	Electrification
2024	CNMC	Circular 3/2019 on Market and System Operation	Electrification

Spain			
YEAR	ENTITY	CONSULTATION NAME	PRIMARY CLIMATE POSITION
2024	CCAA - Aragón	Aragón Energy Plan 2024–2030	Electrification
2024	CCAA - País Vasco	Roadmap for the LP and the Energy Transition and Climate Change Strategy	Electrification
2024	CCAA - Valencia	Climate Change Decree-Law	Electrification
2025	DSOs	Detailed specifications for determining demand access capacity to electricity distribution networks	Renewables & Infrastructure
2025	CNMC	Formats for publishing access capacities for electricity generation and demand installations by grid operators	Renewables & Infrastructure
2025	MITECO	Plans and procedures for the implementation of smart natural gas meters	Renewables & Infrastructure
2025	MITECO	Measures for the protection of birdlife against collision and electrocution on high-voltage power lines and to reduce mortality in wind turbines	Renewables & Infrastructure
2025	MITECO	Regulatory bases for direct grants to Spanish projects participating in the “Auction-as-a-Service” scheme of the European Hydrogen Bank	Renewables & Infrastructure
2025	MITECO	Call for energy storage grants with FEDER 21-27	Renewables & Infrastructure
2025	MITECO	Regulatory bases and call for grants to innovative energy storage projects eligible for EU co-financing	Renewables & Infrastructure
2025	MITECO	Regulatory bases for the incentive program for efficient heating and cooling networks using renewable and residual energy sources eligible for co-financing with UE FEDER funds (FEDER Program 21-27).	Renewables & Infrastructure
2025	MITECO	Free allocation of emission allowances to the fifth group of new entrants 2021–2025	Renewables & Infrastructure

Spain			
YEAR	ENTITY	CONSULTATION NAME	PRIMARY CLIMATE POSITION
2025	MITECO	Demand access capacity tenders at certain transmission network nodes	Renewables & Infrastructure
2024	MITECO	Electricity charges for 2024	Renewables & Infrastructure
2024	MITECO	Granting of access capacity to the electricity grid at the Lancha 220 kV node	Renewables & Infrastructure
2024	MITECO	Regulation of electricity production in offshore installations	Renewables & Infrastructure
2024	MITECO	General Coastal Regulation	Renewables & Infrastructure
2024	MITECO	Regulation of the Carbon Fund for a Sustainable Economy	Renewables & Infrastructure
2024	MITECO	Grants for unique biogas and biomethane installations	Renewables & Infrastructure
2024	MITECO	Ayudas a proyectos de Valles o Clúster de Hidrógeno Grants for Valle project or Hydrogen Clusters	Renewables & Infrastructure
2024	MITECO	Grants for unique renewable energy projects	Renewables & Infrastructure
2024	MINTUR	Statute of Electro-intensive	Renewables & Infrastructure
2024	MITECO	Renewable electricity credit mechanism in the transport sector	Renewables & Infrastructure
2024	Transición Justa	Granting of access capacity at MEIRAMA, NARCEA, and LA PEREDA	Renewables & Infrastructure

Spain			
YEAR	ENTITY	CONSULTATION NAME	PRIMARY CLIMATE POSITION
2024	MITECO	Royal Decree to improve birdlife protection	Renewables & Infrastructure
2024	MITECO	Royal Decree to improve birdlife protection	Renewables & Infrastructure
2024	MITECO	Wind and solar investment aid in non-mainland territories co-financed with FEDER funds	Renewables & Infrastructure
2024	MITECO	Industry and transport targets (Articles 22 bis, 25, 26, 27, and 28)	Renewables & Infrastructure
2024	MITECO	Instrument Regulating the Direct Granting of Subsidies to Spanish Projects Participating in the “Auction-as-a-Service” Scheme in the Second Auction of the European Hydrogen Bank	Renewables & Infrastructure
2024	MITECO	Free Allocation of Emission Allowances to the Fourth Group of New Entrants for the 2021–2025 Period	Renewables & Infrastructure
2024	MITECO	Draft Order and Operating Procedure to Regulate a Capacity Market in the Spanish Mainland Electricity System	Renewables & Infrastructure
2024	MITECO	Amendment to the RECORE Remuneration Scheme	Renewables & Infrastructure
2024	CNMC	Distribution Remuneration 2020 (Second Round)	Renewables & Infrastructure
2024	CNMC	Determination of Generation Access Capacity to the Transmission and Distribution Networks	Renewables & Infrastructure
2024	CNMC	Establishment of Operating Patterns for Storage Facilities for the Determination of Access Capacity to Distribution Networks	Renewables & Infrastructure
2024	CNMC	Determination of the Cost of New Entrants (CONE) for the Reliability Standard (RS)	Renewables & Infrastructure

Spain			
YEAR	ENTITY	CONSULTATION NAME	PRIMARY CLIMATE POSITION
2024	CNMC	Electricity Tariff Methodology for 2026–2031	Renewables & Infrastructure
2024	CNMC	Distribution Remuneration 2021	Renewables & Infrastructure
2024	REE	Operating Procedures 9.2, 14.4, 10.1, and 10.2 for Settlement of Capacity Commitment Breaches and Remote Metering, and Other Improvements	Renewables & Infrastructure
2024	CCAA - Madrid	Preliminary Draft Law on the Balance Between Environmental Protection and Land Use Planning	Renewables & Infrastructure
2024	CCAA - Madrid	Simplification Project	Renewables & Infrastructure
2025	CNMC	Operating rules for the day-ahead and intraday electricity markets to adapt to quarter-hourly trading and new offer types	Just, affordable and secure energy transition
2025	CNMC	Operating rules for the day-ahead and intraday electricity markets to adapt to quarter-hourly trading and new offer types	Just, affordable and secure energy transition
2025	CNMC	Modification of electricity operation procedures to adapt to quarter-hourly trading in day-ahead and intraday markets	Just, affordable and secure energy transition
2025	MITECO	Energy Affordability Strategy 2025–2030	Just, affordable and secure energy transition
2025	MITECO	District heating and cooling networks and implementation of an integrated GO system for thermal uses	Just, affordable and secure energy transition

Table 3.

Brazil		
ENTITY	CONSULTATION NAME	PRIMARY CLIMATE POSITION
Ministry of Finance	Brazilian Sustainable Taxonomy (Notebooks: Minimum Safeguards, Generation and Distribution, Addressing Inequalities).	Just, affordable and secure energy transition
Agência Nacional de Energia Elétrica - Aneel	Public Consultation No. 013/2025 – To gather input for improving Regulatory Impact Analysis – RIA No. 2/2025-STR/ANEEL, regarding the regulation of the Distribution System Usage Tariff (TUSDg) applicable to generation plants when transferring Transmission Installations of Exclusive Restricted Interest of Generation Plants to Shared Connection – ICG and/or Transmission Installations of Exclusive and Individual Interest of Generation Plants – IEG. Deadline: 03/27/2025 to 05/12/2025.	Renewables & Infrastructure
Agência Nacional de Energia Elétrica - Aneel	Public Consultation No. 28/2023 (2nd Phase) – Improvements to the regulation of energy commercialization resulting from Law No. 14,120 and MME Ordinance No. 50/2022.	Electrification

Table 4.

Australia			
YEAR	ENTITY	CONSULTATION NAME	PRIMARY CLIMATE POSITION
2025	Australian Government DCCEE (Department of Climate Change, Energy, the Environment and Water)	NEM Review - Initial Consultation	Electrification
2024	Clean Energy Regulator (CER)	Corporate Emissions Reduction Transparency (CERT) Report – Consultation Paper 2	Electrification
2024	Australian Government DCCEE (Department of Climate Change, Energy, the Environment and Water)	Aurora Green Offshore Wind Farm – EPBC Referral	Renewables & Infrastructure

Australia			
YEAR	ENTITY	CONSULTATION NAME	PRIMARY CLIMATE POSITION
2024	Australian Energy Market Commission (AEMC)	Transitional Services Update Paper	Renewables & Infrastructure
2024	Australian Energy Market Operator (AEMO)	Congestion Information Resource (CIR) Guideline Review	Renewables & Infrastructure

Table 5.

Portugal		
ENTITY	CONSULTATION NAME	PRIMARY CLIMATE POSITION
Entidade Reguladora dos Serviços Energéticos	Draft Directive Proposal on the Forward Contracting Mechanism for Production with Guaranteed Remuneration.	Electrification
Entidade Reguladora dos Serviços Energéticos	Amendment of the MPGGS for the implementation of standard aFRR products and other system management tools provided for in the ROR.	Electrification
Entidade Reguladora dos Serviços Energéticos	Methodological review of the study provided for in the legal framework of the Competitive Balancing Mechanism (“clawback”)	Renewables & Infrastructure
Entidade Reguladora dos Serviços Energéticos	Revision of the Guide for Measurement, Reading, and Data Availability.	Electrification

Portugal		
ENTITY	CONSULTATION NAME	PRIMARY CLIMATE POSITION
Entidade Reguladora dos Serviços Energéticos	Draft Manual of Procedures for the activity of registration and bilateral contracting of electric energy (MPPPA)	Electrification

Policy Engagement by geographies

Spain

In 2024, relations with national public administrations involved engagement with ministries related to the sector and their technical departments, with particular emphasis on the Ministry for the Ecological Transition and the Demographic Challenge (MITECO). Likewise, the company closely interacted and collaborated throughout the year with key stakeholders such as the national energy regulatory authority (National Commission on Markets and Competition – CNMC) and the Institute for Energy Diversification and Saving (IDAE). As in other markets, 2024 was a year of significant complexity in the energy sector, which led to intense regulatory activity.

In this context, the main interactions with the aforementioned institutions focused on the following topics:

- Temporary energy levy
- Energy transition targets and energy affordability strategy
- Electricity market reform and European standardization of crisis response measures
- Setting of European environmental targets

- Long-duration energy storage and capacity mechanisms
- Environmental tax reform based on the “polluter pays” principle, aimed at reducing the tax burden on electricity (green taxation)
- Methodology for financing the Social Tariff (Bono Social)
- Evaluation of regulated tariffs: PVPC and TUR for gas
- Acceleration of renewable energy deployment and increased electricity demand (new business models)
- Improvement of the remuneration framework for electricity grids to encourage investment and leverage industrialization opportunities linked to decarbonization and the energy transition
- Next Generation EU funds and the National Energy Efficiency Fund (FNEE)
- Demand-side grid access for industrial electrification and new industries that can benefit from Spain’s competitive energy pricing in the context of the energy transition
- Electrification of industrial heat using electric boilers and thermal storage, and future cogeneration auctions
- Promotion of electric mobility and building decarbonization
- Impact on the levy paid by nuclear power plants to ENRESA, state-owned company responsible for future dismantling and radioactive waste management, due to the revision of the 7th General Radioactive Waste Plan and the decision to cancel the Centralized Temporary Storage project in Villar de Cañas. Potential extension of the nuclear phase-out timeline.

At the regional and local levels, the company’s engagement focused on areas such as:

- Energy planning, particularly regarding the deployment of renewable technologies and grid development
- Authorization processes for renewable facilities, charging points, and other infrastructure
- Regional strategies on climate change and sustainable consumption
- Development of building and transport decarbonization
- Elimination or reduction of regional environmental taxes (eco-taxes)

UK

Scottish Power makes frequent contacts at corporate or business level with UK public institutions at national, regional or local level. At the national level, the company maintained ongoing relations with various ministries, the energy regulator (Ofgem) and other public servants. The interactions carried out, in the context of a time of great complexity in the energy sector, involved issues such as the following:

- Ongoing emphasis on energy security.
- Energy price caps and rising energy bills and proposals for short- and long-term relief.
- Acceleration in the deployment of renewable energies and the transmission network.
- Need for agile regulation to support the network investment process.
- Acceleration in the planning of all infrastructure to support decarbonisation targets.
- Review of electricity market agreements.
- Energy efficiency.
- Green hydrogen policy.

In addition, ScottishPower has interacted with representatives of regional and local public administrations. The key issues addressed throughout 2024 were as follows:

- Planning related to renewable energy deployment and grid development.
- Decarbonisation goals, covering renewable energy, heat, transport, industry, green hydrogen and net zero emission targets.
- Proposals for a Scottish Heat in Buildings Bill expected in 2025
- ScotWind programme to provide wind developers with greater certainty regarding timeframes and decision-making processes for planning consent and managing seabed leases.

- Thermal and energy efficiency policies and programmes.
- Environmental permitting and regulation.
- Increasing importance on biodiversity and circular economy.

Brazil

Neoenergia has actively engaged with Brazilian legislators and public institutions to support the development of climate-related policies and regulatory frameworks. These direct engagements included:

- Human Rights and Just Transition Neoenergia contributed technical inputs-such as notes and documents-within the Human Rights Working Group of the Brazil Network of the UN Global Compact to support the discussion of Bill PL 572/22, which regulates private sector responsibilities regarding human rights in the context of a just energy transition.
- Carbon Market Regulation Neoenergia coordinated directly with parliamentarians and advisory teams during the legislative process of Bill No. 182/2024, which established the Brazilian Greenhouse Gas Emissions Trading System (SBCE). The company also provided technical notes and sectoral positioning.
- Offshore Wind Regulatory Framework Neoenergia engaged with legislators and advisory teams regarding Bill No. 576/2021, which regulates the use of offshore energy potential. The company contributed technical positioning and monitored the process through sector associations.
- Energy Transition Acceleration Program (PATEN) Neoenergia coordinated with parliamentarians and advisory teams to support Bill No. 327/2021, which created the PATEN program to accelerate Brazil's energy transition. The company provided technical notes and sectoral input.

Italy

In 2024, Iberdrola Italia actively engaged with Italian institutions to influence the regulatory framework for renewable energy, particularly the Consolidated Law on Renewable Energy Sources (TU FER). The company also addressed technical barriers such as virtual grid saturation and contributed to discussions on incentive mechanisms like FER X and the Energy Release scheme.

Iberdrola held multiple institutional meetings with members of the Senate Environment Commission and the Committee on Productive Activities in the Chamber of Deputies. These engagements served to present the company's observations and proposals for improving the TU FER, as well as to discuss specific renewable energy projects in Tuscany. These meetings also reinforced Iberdrola's institutional presence and credibility in the Italian legislative process.

The company introduced its operations and shared its position on the TU FER with senior officials in the Ministry of the Environment and Energy Security. This engagement aimed to influence the interpretation and implementation of the law from an executive and regulatory standpoint.

Iberdrola Italia engaged with the national transmission system operator to explore legislative solutions to virtual grid saturation, a key obstacle to renewable integration. Additionally, the company met with the national energy services operator to exchange views on recent regulatory developments, including the design and implementation of FER X and the Energy Release mechanism.

These coordinated efforts reflect company strategic approach to shaping a more enabling and efficient policy environment for renewable energy deployment in Italy.

Europe

The list of any meetings Iberdrola has held with Commissioners, Members of their Cabinet or Director-Generals under its current identification number in the EU Register is available here: <https://ec.europa.eu/transparencyregister/public/meetings/41816938101-07/pdf>.

