

Response to the invitation for submissions on the road map for global climate action from the High Level champions

This document presents the submission of UNESA, the Spanish Association of the Electricity Sector to the invitation made by the High Level Champions, Her Excellency Ms. Laurence Tubiana, French Ambassador for climate change and Her Excellency Ms. Hakima El Haite, Minister Delegate to the Minister of Energy, Mines, Water and Environment of Morocco, in charge of the Environment on their Road map for global climate action.

1) The current situation

Is this general presentation an accurate description of the current state of play? If not, what can we do more?

The high level champions point out the following needs in describing the situation:

- to quick-start implementation with a sense of urgency and ambition
- create an interface with the real world and solutions, particularly the involvement of non-Party stakeholders;
- maintain the political momentum

The electricity sector is fully involved in the climate challenge both as part of the problem but especially as part of the solution to mitigate and adapt to climate change. We share the sense of urgency, the need for more ambition and the absolute need of engagement by non-Party stakeholders and more precisely of the electricity sector, as observer and provider of solutions to the climate change challenge.

The electricity sector provides a clean, secure and efficient supply of energy in a cost effective manner. Over the years the electricity has been contributing to substantial reductions in the energy intensity of the economy production and energy related carbon dioxide (CO₂) emissions, through increasingly efficient and flexible power plants, more efficient grids and an increasing share of low carbon generation plants with a special regard to the renewables deployment.

- On the supply side, electricity companies are limiting emissions from electricity generation, by improving efficiency and by increasing the use of low- or non-emitting supply technologies. However, most of these costs are faced by electricity consumers. As a consequence, electricity is artificially expensive as compared with other energy carriers, which hampers a higher decarbonisation of the economy.
- On the demand side, the greater use of energy-efficient electrotechnologies is one of the most significant factors supporting economic growth, improving energy efficiency and reducing CO₂ emissions. In particular, electric technologies can be greatly effective in reducing greenhouse gases in developing countries and economies in transition, where considerable economic growth is expected.

The role of the electricity sector worldwide will need to be strengthened if we are to achieve the ambitious commitments we are assuming. A number of studies have shown that the necessary global reductions to not exceed the 2°C temperature rise can be achieved to a large extent through the simultaneous decarbonisation of electricity and the electrification of the domestic, commercial and transport sectors when combined with significant improvements in energy efficiency. This will also lead to other environmental benefits like improvements in air quality and will also foster energy security and economic performance.

The electricity sector is fully committed with this challenge and aims to be part of the solution through an effective engagement in the process among other actions. But if the other polluting sectors are not committed at par, assuming the responsibility and costs according to their CO₂ emissions, the 2°C target cannot be reached.

2) The role of the high-level champions

Is this an accurate description of the role the high-level climate champions should play with regard to the mobilization of non-state actors? Is there anything else they should do, or are there things mentioned here that they should not do?

The role of the High level champions is described as providing an interface between action on the ground and the UNFCCC negotiation process, between non-Party stakeholders and Parties. It includes the tracking of implementation of existing initiatives to demonstrate credibility, promote best practices and enhance delivery and the support for new initiatives broadening the country coverage and including more initiatives coming from developing country Parties and non-Party stakeholders

We believe the role of the High level champions can be very important especially in mobilizing action and providing a credible and transparent framework to showcase it.

- Concerning mobilization, it is essential to recognize that all sectors and agents have a role to play in the climate challenge. Clearly identifying and defining the roles of each one will help substantially the process. Private sector involvement is very necessary, but business typology is wide and diverse in terms of sectors, regions, etc... and therefore different approaches may be necessary. The work of the high level champions can be essential in achieving a broader participation of business including from the developing countries and small and medium enterprises.
- In tracking the implementation of existing initiatives, there is also a wide spectrum that needs to be streamlined in order to enhance credibility and to facilitate the process. From individual commitments to collaborative associations or initiatives, companies are involved in a wide range of actions. The high level champions could help clarifying and providing a platform to clearly communicate what is contained in each initiative to reinforce and optimize the process.
- The high level champions can also help in the development of public-private partnerships in a wide range of issues that are meant to be a key element of the process. The Nationally Determined Contributions offer a clear field to work together. The private sector can be very helpful and collaborate in the process of elaborating and implementing developing countries NDCs and the high level champions could help providing this interface. NDCs could be, from our point of view, an instrument to promote the collaboration between countries and to give visibility to the investors.
- An innovative platform for information sharing could be very helpful to ensure openness, flexibility and inclusivity of the engagement model.
- To foster communication and exchange of views on climate negotiations between governments and the private sector the High Level champions could continue organising "Business dialogues" between international business leaders, ministers, negotiators and policy-makers serving as a link between the process and the private sector. These dialogues could be structured around specific areas and/or sectors to facilitate the achievement of useful conclusions that could feed the negotiating process.
- Supporting a high enough carbon price that sends the right signal to the clean technologies investors, bringing the switching from highly polluting fuels to cleaner ones.

3) Transparency and tracking

How do we assess the initiatives? What would be the ideal set of criteria? Who would assess them? What should be the role of the Non-State Actor Zone for Climate Action (NAZCA)?

We agree that there is a need to ensure that the initiatives and coalitions achieve the targets they have set and that these targets are consistent with the Paris Agreement. Every commitment must include as much as possible quantified and time-bound objectives. In order to create a dynamic, and an upward spiral of ambition, these objectives can usefully be set for 2020, 2030 and 2050. Reporting must be implemented, following a recognized methodology (including scopes, years of reference, covered GHGs, etc.) and in a spirit of transparency/external verification. In this sense, there are numerous initiatives in which companies report their performance and commitments. It is essential to provide a comparable framework but there is no need to increase the reporting obligations of companies. Existing disclosed information could be used and tailored to fit this purpose. Initiatives such as the Carbon Disclosure Project, the Global Reporting Initiative... already disclose information from companies and can offer a valuable input.

The Nationally Determined Contributions will be affected by the transparency framework, and therefore a whole new set of criteria and recommendations will be developed. The tracking process of initiatives from the private sector may also benefit from this work.

In general, reporting methodologies have to be developed for the sectors or companies that still lack them, but in the case of sectors and/or companies already reporting under existing international standards or initiatives the existing work needs to be optimized.

4) High-level event

What do Parties and non-Party stakeholders expect from the high-level event at COP 22? To have a real impact at COP 24 in 2018, the Climate Action Summit showcasing the results of non-state actor initiatives would need to take place sufficiently in advance. Should it be organized in the summer of 2018?

The high level event is a good opportunity to showcase the results and evolution of climate action by non-Party stakeholders and to discuss it with negotiators. It could include the report of the outcomes of the Technical Expert Meetings and business dialogues celebrated that year and a report from the high level champions on the state

of the art. It can be an opportunity to review and assess the quantity and quality of climate action.

It is necessary to try to avoid the proliferation of a myriad of international meetings, and clearly communicate the aims of each meeting. The high level champions could organize those meetings seeking for an equilibrated participation among sectors, regions, etc...We agree with the organization of the Action summit in summer 2018 and we would welcome a clear calendar of meetings in which the participation of the private sector is to be required for each year independently of the existence of a more permanent channel of communication. Without Public Private Partnerships, the 2°C target will not be reached.

5) The role of the TEMS

Do you share the belief that the format of the TEMs should evolve in the light of the Global Climate Action Agenda? How could we ensure that the TEMs are more solution-oriented?

In general, we believe that the UNFCCC process needs to build on existing work. This is a long process in which we have been building upon initiatives, tools, mechanisms, rules, etc... that delivered lessons that we need to keep in mind.

It is well known that to address the emissions gap, there is a range of policies, measures and actions that could be replicated and scaled up to accelerate pre-2020 mitigation action.

Within the UNFCCC work on pre-2020 action, technical expert meetings (TEMs) were designed to enable Parties and non-State actors to jointly identify opportunities for actions with high mitigation potential and their co-benefits. In this technical process, that we find very useful, Parties have already identified six thematic areas with high mitigation potential, opportunities for action and various co-benefits: renewable energy, energy efficiency, the urban environment including transport, carbon capture, use and storage, methane and other non-CO₂ GHGs and land use. We believe that these meetings are a good opportunity for government officials and civil society, and particularly directly involved technicians, business and finance stakeholders to discuss concrete measures to reduce greenhouse gases as well as their mitigation and/or adaptation potential, barriers and opportunities in the fight against climate change.

The TEMS could also deal with other technical issues like for example the barriers to action identified by the Secretariat¹:

- Lack of institutional, regulatory and legal frameworks
- Existence of inefficient subsidies
- Lack of carbon pricing
- Inadequate finance, technology and capacity building support

We believe these are very useful discussions and should continue providing concrete input to the process. The Sessions have to be designed and programmed to be concrete, focused, and if possible connected to initiatives of the action agenda and therefore the high level champions could channel this collaboration between public and private agents.

¹ Climate Action now, summary for policy makers 2015, UNFCCC