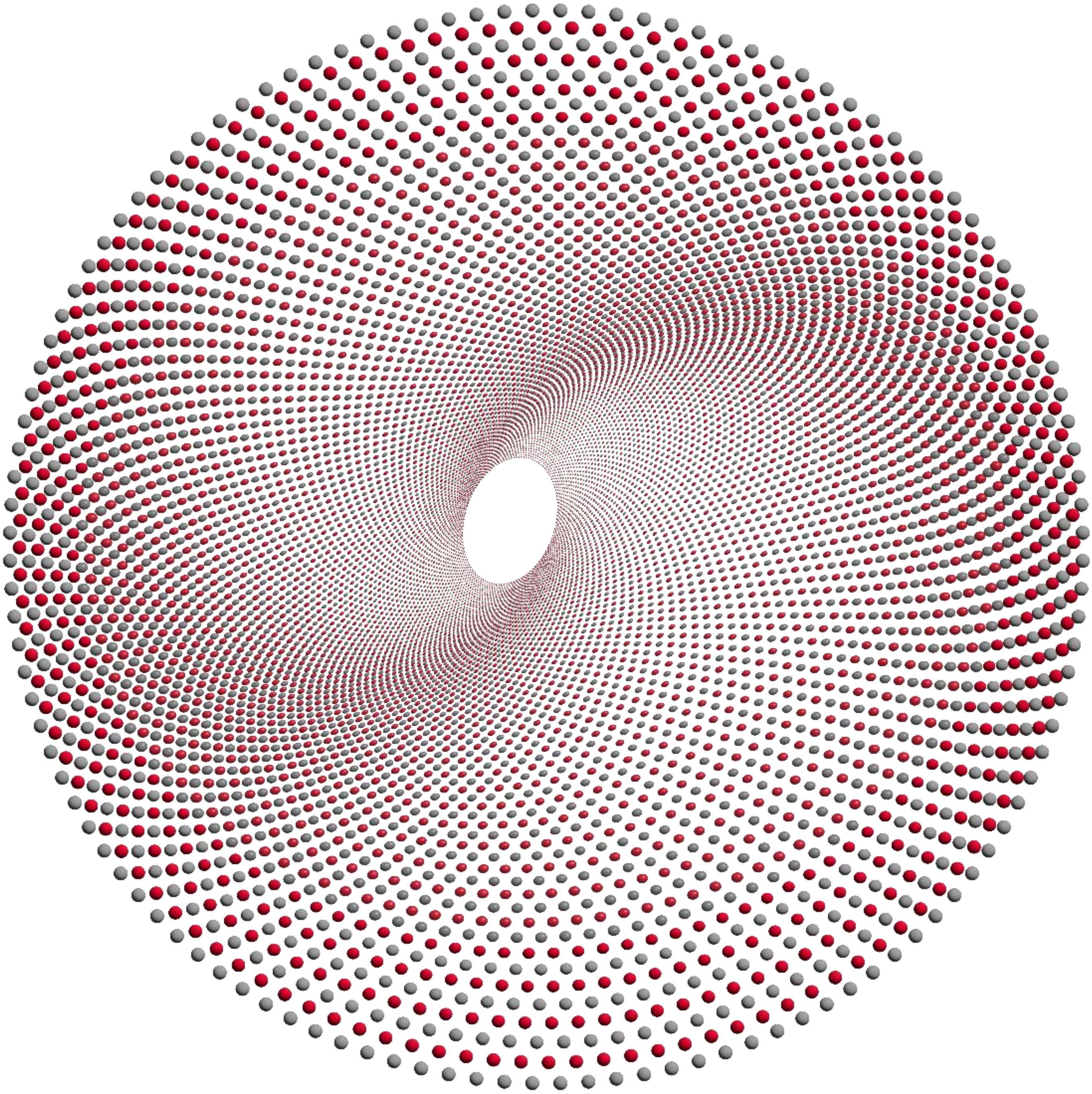

Legal Alert

Measures to Strengthen the Energy Sector

29th of June 2026

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Following the recent measures announced by the Portuguese Government to accelerate the energy transition, strengthen security of supply, enhance the competitiveness of the economy and ensure energy sovereignty, the **Environment, Energy and Infrastructure** team at **Deloitte Legal TELLES** highlights the following legislative developments in the energy sector.

Establishment of the Working Group for the for the Reform of the Public Electricity Grid Access Model (Ministerial Order No. 6941/2026, of 1 June)

The current context of growing demand for connection to the Public Electricity Grid (RESP) for new electricity generation, storage and consumption projects, particularly the constraints currently identified, highlights the need for a structural reform of the grid access model that ensures the effective and efficient use of existing and planned capacity and avoids its underuse.

For this purpose, the Working Group for the Reform of the Access Model to the Public Electricity Grid (GT-Acesso-RESP) was created and is entrusted, in particular, with the following tasks:

- Diagnosing the current model for access to the RESP and the evolution of demand;
- Analysing grid access models adopted in other European countries;
- Defining in detail the new model for access to the RESP (including rules, criteria, phases and deadlines); and, among other functions,
- Proposing the legislative and regulatory amendments required to implement the reform.

The ministerial order establishes a phased work plan, including the preparation of interim reports and a final report. The final report is expected, indicatively, by October 2026, after which a public consultation phase is envisaged.

The following measures were also announced (see the press release here), covering energy generation and storage, reinforcement of electricity grids, renewable fuels and the simplification of procedures for renewable energy projects:

- **Competitive auction for 750 MVA of grid injection capacity for battery storage**

The competitive auction for the allocation of 750 MVA of injection capacity into the RESP for standalone storage is expected to take place on 14 September 2026. According to the Government's announcement, an additional 300 MW will be added as "residual capacity" for renewable projects that include a storage component. With regard to standalone projects, it is expected that municipalities will receive 30% of the revenue generated by the National Energy System under the auction. For "residual capacity" projects, municipalities will receive 70% of the auction revenues. Developers will also be required to allocate 2.5% of the net revenue generated by the projects to municipalities. The tender procedure is also expected to include a 20% incentive (uplift) for projects incorporating an agrivoltaic component.

- **New momentum for wind repowering**

In addition to the regime approved in May (by Decree-Law No. 100/2026, of 22 May), wind projects holding a Capacity Reservation Title may adjust their technology, scale, location or implementation timetable in order to enhance their viability.

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- **Creation of Contracts for Difference mechanisms**

The adoption of medium and long-term contracting mechanisms, namely Contracts for Difference (CfDs), aimed at enhancing price predictability in the energy market, protecting consumers from market volatility and providing greater stability for investments. These instruments will be particularly relevant for technologies with greater investment needs, such as wind energy.

- **High Demand Zone**

The second High Demand Zone (ZGP) procedure is underway, having been extended by the Government to the whole of mainland Portugal, in response to the increase in requests for grid connection for consumption. The new process resulted in expressions of interest corresponding to 4.6 GVA. REN identified the need for an investment of approximately €400 million to reinforce the electricity grid.

- **National Energy Storage Strategy**

On 29 June, the National Energy Storage Strategy will enter into public consultation. The strategy recognises electrochemical batteries and pumped-storage hydropower as strategic assets for the national electricity system, and promotes the expansion of long-duration storage in order to ensure greater grid flexibility, resilience and efficiency. Portugal currently benefits from more than 3.6 GW of installed pumped-storage hydropower capacity, which the Government intends to expand so as to strengthen the balance between solar and wind generation. Under the Recovery and Resilience Plan, 43 storage projects have already been financed, representing an investment of more than €180 million and supporting at least 500 MW of installed battery capacity.

- **Transposition of the Renewable Energy Directive (RED III)**

Following its recent submission to public consultation, the transposition of the RED III Directive into the national legal framework is currently underway, with several legal regimes under revision.

In particular, on 5 June, the President of the Republic promulgated the Government's decree-law amending Decree-Law no. 15/2022 of 14 January, as currently in force, which establishes the organization and operation of the National Electricity System, transposing Directive (EU) 2024/1711 and partially transposing Directives (EU) 2023/2413 and 2023/1791 (see communication here).

Some of the announced legal changes include:

The development of Renewable Energy Acceleration Areas (ZAER), intended to simplify and accelerate the deployment of new renewable projects (the so-called "Green Map").

It was also announced that the Sectoral Programme for Renewable Energy Deployment Acceleration Zones (PSZAER) will be submitted for public consultation. The public consultation opened on 17 June and will run until 15 July on the participa.pt portal, available here.

It is also expected that the concept of "overriding public interest" will be introduced, applicable to the planning, construction and operation of renewable generation facilities and storage installations, thereby conferring strategic priority on projects deemed essential for the energy transition, while ensuring coordination among the competent authorities.

These changes to Decree-Law no. 15/2022 of 14 January have already been published through Law no. 29/2926, of 23 June and Decree-Law no. 130/2026, of 29 of June.

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- **Biomethane**

With regards to the production and consumption of biomethane, the Government has indicated the introduction of simplified licensing procedures, new support mechanisms and increased visibility regarding the implementation of the National Biomethane Action Plan in Portugal.

The objective is to further the decarbonisation of industry and transport, promote waste valorisation, and enhance the country's energy sovereignty.

- **Biomass**

The Government plans to allocate 60 MW of capacity under the revised regime and to update the remuneration of plants, recognising their contribution to forest management and fire prevention.

- **DGEG also published a draft Ministerial Order on the licensing of electricity storage installations**

DGEG has launched a public consultation (see here), which has ended on the 24th of June, the draft ministerial order establishing the procedures applicable to the granting of prior control titles for electricity storage installations.

This instrument seeks to address shortcomings identified in practice, by further specifying and harmonising the documentation requirements and procedural handling of licensing and registration applications, distinguishing between stand-alone and co-located storage (including in conjunction with generation facilities and self-consumption units), which are subject to licensing or registration depending on their installed capacity.

- **Electric Mobility**

The extension of the transitional period of the legal framework governing electric mobility until 31 December 2027 has been approved by the Council of Ministers (see here). The extension is justified by the need to adapt the management models of charging points, ensure interoperability between platforms, and review concession agreements, which cover approximately 70% of the existing network.

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