Energy and Infrastructure

Greece's New Framework for Renewable Energy Permitting

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I. Introduction

On 5 May 2026, Greece enacted Law 5299/2026 (Government Gazette A' 67/5.5.2026) (the "**Law**"), transposing - inter alia - Directive (EU) 2023/2413 ("**RED III**"). Chapters C and D of Part A of the Law introduce Renewable Energy Acceleration Areas ("**REAAs**") with a conditional exemption from environmental permitting, statutory time limits for each licensing step and for the process as a whole, new rules on the validity of Grid Connection Offers ("**GCOs**") and a revised procedure for repowering of renewable energy sources ("**RES**") projects.

Under Article 47(5) of the Law, Chapters C and D apply to **new applications** submitted to the competent bodies from 5 May 2026. They do not automatically capture applications already pending on that date; equally, they are not confined to new projects - an existing project that files a new application (for example, for a GCO or an Installation Licence) after that date will be handled under the new rules for that step, subject to any specific transitional provisions.

This newsletter sets out what has changed, the conditions attached to the new time limits and what developers, investors and lenders should check now.

II. Renewable Energy Acceleration Areas

What REAAs are and where they can be located

REAAs are specific geographic zones designated for the fast-track development of RES projects and their associated infrastructure - grid connections, storage and any other works required for their connection to the network. Under the new Article 7A of Law 3468/2006, REAAs are a subset of the areas mapped as necessary for the development of photovoltaic and onshore wind projects under Ministerial Decision ΥΠΕΝ/ΔΑΠΕΕΚ/144627/3247/2025 (Government Gazette B' 7365), and the designating decision may exclude specific technologies, in particular biomass combustion and hydropower.

These areas are located, inter alia, outside Natura 2000 zones, national

conservation areas, and major migratory routes - with the exception of artificial and built surfaces within those areas, such as rooftops, car parks and transport infrastructure - and the Law also refers to land that cannot be used for agricultural purposes.

Previously, priority zones were designated by Presidential Decree. Under the new Law, REAAs are designated by Ministerial Decision ("MD"), preceded by a Strategic Environmental Impact Assessment ("SEIA") prepared by the General Secretariat for Spatial Planning and Urban Environment, which requires the approval of the Directorate of Environmental Licensing and the opinion of the Central Council for Spatial Planning Issues and Disputes ("KESYCHOTHA") - both within the Ministry of Environment and Energy.

The MD determines the size of each REAA, the rules for the development of RES projects and related infrastructure, the allocation of installation areas and the maximum capacity per installation area, and lays down the environmental guidelines, conditions and mitigation measures at area level on the basis of the SEIA. It may also grant licensing incentives and other non-financial incentives to projects located within the REAA.

Note: In August 2026, the Ministry of Environment and Energy designated the first three REAAs in the Megalopoli lignite phase-out zone (approximately 1,291, 270 and 234 stremmata, respectively) for the development of photovoltaic projects with or without electricity storage (MD ΥΠΕΝ/ΔΝΕΠ/89999/3073/7.8.2026, Government Gazette B' 5002/7.8.2026). Under Article 2(3) of the designation decision, project development and permitting in those areas are conditional on a decision of RAAEY lifting grid saturation, following the competent operator's recommendation, subject to the exception provided for self-consumption stations. Separately, the new Special Spatial Framework for RES was published in Government Gazette D' 694/19.8.2026. Projects elsewhere remain under the general regime until further REAAs are designated.

Environmental Licensing

The most commercially significant feature of the REAA regime is that RES projects located within REAAs and developed in compliance with the environmental conditions and mitigation measures of the designating MD are, as a general rule, exempt from environmental permitting and from the special

ecological assessment under Law 4014/2011. More accurately though, this is less an exemption than a shift of environmental assessment from the project level to the strategic, area-wide level i.e. the SEIA and the designating Ministerial Decision fix the environmental terms and mitigation measures once, for the whole zone, and individual projects that comply are relieved of a separate project-level assessment.

That said, the exemption rule is not absolute. For environmental category A projects, the exemption is not automatic. Before applying for a GCO, the developer must submit an exemption application to the competent environmental authority. The authority completes its review within 30 days (20 days for repowering) from the submission of all required information and issues either an exemption certificate or a duly reasoned decision referring the project to environmental permitting. Referral requires clear evidence that the project is highly likely to cause significant unforeseen adverse effects which cannot be mitigated by the measures of the MD or by measures proposed by the developer. Where a project is referred, environmental permitting runs on a priority basis within 6 months for sub-category A1 projects (4 months for A2), extendable to 12 (or 8) months in duly justified exceptional circumstances, counting from the referral decision.

Separately, projects within REAAs remain subject to environmental permitting where they are likely to have significant environmental effects in another Member State, or where such permitting is requested by a Member State that may be significantly affected. This cross-border requirement operates in addition to the screening described above.

Biodiversity safe harbour: The Law also limits nature-conservation risk. Projects that comply with the mitigation measures set for their REAA are presumed not to breach the habitat- and species-protection rules implementing the Habitats and Birds Directives (Directive 92/43/EEC and Directive 2009/147/EC respectively) and the non-deterioration objective for water bodies under Presidential Decree 51/2007. The presumption is limited to those provisions and is without prejudice to the screening of category A projects described above.

Step-by-Step timelines within REAAs

The Law sets a time limit for each core licensing step for RES projects located within REAAs. The new deadlines for the RES licensing process in REAAs are

formulated as follows:

Permitting step	Statutory time limit and trigger	Qualifications
Producer Certificate (or Special Projects Certificate)	Within 10 days from the expiry of the objections period where no objections are filed; otherwise within 10 days from the expiry of the period for the applicant's response to the objections, or from the submission of that response	None
Environmental exemption screening (category A projects)	Within 30 days (20 days for repowering) from the submission of all required information	Must precede the GCO application. Referral to environmental permitting only on clear evidence that significant unforeseen effects cannot be mitigated (see above)
GCO	Within 30 days from either (i) the expiry of the 20-day review period for requesting supplementary information, where no request is made, or (ii) submission of the requested supplementary information	The competent operator may request supplementary documents or clarifications within 20 days of the application. If no request is made, the application is deemed complete
Grid Connection Agreement (GCA)	30 days for execution of the main agreement and 15 days for execution of the supplement, each from the submission of the relevant request; or 45 days from the application where the agreement is a single text	Applies following submission of the relevant complete application
Installation Licence	Within 10 days from either (i) the expiry of the 20-day review period, where no request is made, or (ii) the submission of the requested supplementary information	The competent licensing authority may request clarifications or supplementary documents within 20 days of the application. If no request is made, the application is deemed complete
Operating Aid Agreement / Direct Market Participation Certificate (DAPEEP)	Within 5 days of the application	None

Permitting step	Statutory time limit and trigger	Qualifications
Operation Licence	Governed by Article 28 of Law 4951/2022, as amended, subject to its provisions on supplementary information and site inspection	A special accelerated procedure applies to repowering within REAAs (see below)
Stations ⩽150 kW within a REAA	GCO within 30 days of the application; single-text GCA within 30 days of the application; Operating Aid Agreement or direct market participation certificate within 5 days	Article 7C(7) of Law 3468/2006; without prejudice to the notified-stations regime
Repowering within a REAA	Producer Certificate within 5 days from the applicable objections-stage trigger; for the new GCO, Installation Licence and Operation Licence, a 10-day review period followed by issuance within 10 days of its expiry where no supplementary information is requested, or within 10 days of the submission of the requested information; single-text GCA within 30 days of the application	Article 42(2), (3A), (5A)-(5C) of Law 4951/2022; environmental exemption screening within 20 days

Note: Dedicated routes also apply to smaller installations (Articles 15-17 of the Law): photovoltaic stations on buildings and other artificial structures (case (ιστ) of Article 33(1) of Law 4951/2022) must be licensed, including environmental licensing, within 90 days in total; notified stations within 30 days in total, with the operator responding to the connection request within 5 days; and exempted stations of up to 150 kW outside REAAs receive their GCO within 2 months of the application. This newsletter otherwise focuses on the general procedures.

Maximum overall duration within REAAs

The Law also caps the overall duration of the licensing and grid connection process for RES projects located within REAAs.

For projects requiring a Producer Certificate, the timeline runs from the submission of the Producer Certificate (or Special Projects Certificate) application until the issuance of the Operation Licence. For exempted stations, the timeline runs from the submission of the environmental licensing application until grid connection and issuance of the electrification certificate, as follows:

Project Type - Within REAA	Maximum Duration	Maximum Extension
All RES (incl. exempted)	12 months	+6 months
Offshore RES (if within REAA)	24 months	+6 months
Repowering / Small-scale ≤150 kW	6 months	+3 months
Offshore repowering / small-scale ≤150 kW	12 months	+6 months

The following periods are expressly excluded from the calculation of the above durations and of the individual response deadlines of the authorities and operators involved:

- the time required for the construction or repowering of the generating facility;
- the time required for the construction of grid connection works and related network infrastructure necessary to ensure grid stability, reliability and security;
- the duration of administrative procedures relating to major grid upgrades; and
- the duration of judicial proceedings, appeals, dispute resolution procedures and other legal remedies.

Any extension must be duly justified by exceptional circumstances, particularly where prolonged assessments are required under applicable EU environmental legislation. In such cases, both the project owner and the One-Stop Shop (which operates the Single Information System for the Licensing of RES Projects) must be notified. It is important to note that the Law adds the notification requirement but does not make the One-Stop Shop the authority responsible for issuing project approvals.

Note: The Law expressly pursues acceleration "through the establishment of binding deadlines" (Article 1), and the time limits above should in our view be treated as binding on the administration. Expiry of these time limits does not, however, give rise to a general deemed-approval mechanism. Specific consequences of non-response nevertheless apply where the Law so provides, including deemed completeness of the application under the relevant

procedures and the conditional connection right for notified stations under Article 38(3) of Law 4951/2022.

III. Acceleration of Projects outside REAAs

Maximum overall licensing duration

Similar to the regime applicable within REAAs, the Law sets a maximum overall licensing duration for projects outside REAAs. The overall timeline generally runs from the submission of the Producer Certificate (or Special Projects Certificate) application until the issuance of the Operation Licence. For exempted stations, the timeline runs from the submission of the environmental licensing application until grid connection and issuance of the electrification certificate.

Project Type - Outside REAAs	Maximum Duration	Maximum Extension
All RES & high-efficiency CHP (incl. exempted stations)	2 years	None expressly provided
Offshore RES & high-efficiency CHP	3 years	+6 months
Small-scale ⩽150 kW	12 months	+3 months
Offshore small-scale ⩽150 kW	24 months	+3 months
Repowering - onshore (incl. exempted stations)	12 months	+3 months (see note)
Repowering - offshore	24 months	None expressly provided

Note: the six-month extension is granted only to the offshore (three-year) deadline; the two-year onshore deadline carries no express extension. Similarly, the three-month extension for repowering (Article 42(8) of Law

4951/2022) refers to the first sentence of that paragraph, i.e. the 12-month onshore period; its application to the separately worded periods for exempted and offshore stations should not be assumed.

The same periods are excluded from the calculation as within REAAs (construction, grid connection works and necessary grid upgrades, and dispute resolution proceedings), and the same rules on the justification of extensions and on notification of the project owner and the One-Stop Shop apply.

The GCO: processing time limits and validity requirements

The Law adjusts the GCO regime, both in terms of processing timelines and the duration of validity of issued GCOs.

- **Issuance deadline**: The competent grid operator must examine the application and issue the GCO within two (2) months from either (i) the expiry of the 20-day period for requesting supplementary information, where no such request is made, or (ii) the submission of the requested supplementary documents or clarifications. Within the same period, the operator must also notify the applicant where connection is not feasible and provide the reasons for such refusal.

- **GCO validity**: What is changed is that during the validity period of the GCO (3 years from issuance under Article 5(16) of Law 4951/2022 - a term that is itself unchanged, without prejudice to special regimes such as Article 35 for exempted stations), the project owner must submit a complete application both for the execution of the Grid Connection Agreement and for the issuance of the Installation Licence.

Where an Installation Licence is issued within the validity period of the GCO, both the GCO and the corresponding GCA are automatically extended until the expiry of the Installation Licence. Filing a complete application and obtaining the licence are therefore distinct milestones: only the latter triggers the automatic extension.

Special Projects: two rules apply. First, where the deadline for filing a complete Installation Licence application is extended under Article 31 or another special provision, the GCO is extended to the end of the extended deadline. Second - and of immediate practical importance - for Special Projects whose deadline had already been extended as at 30 April 2026, the GCO and all related licences and approvals are preserved or revived and extended accordingly, regardless of whether the GCO had meanwhile expired. Developers holding Special Projects should check their extension history against this date.

Common extra-high-voltage substations: for stations connected to the System through a common EHV substation under the joint-application regime of Article 14 of Law 4951/2022, the implementation period for the substation and the related high- or extra-high-voltage lines is set by the last relevant GCO issued. After that period, the validity of the GCOs may be extended by a further six months on request, provided that a Declaration of Readiness is submitted for all the stations holding a GCO, within the original validity period of each GCO, and subject to a 5% reduction in the applicable Reference Prices. Readiness of a single project is not sufficient.

IV. Repowering

The Law builds on the existing repowering framework of Article 42 of Law 4951/2022 by adding procedural time limits for each step and differentiating the routes within and outside REAAs.

Repowering applications continue to benefit from priority examination for the issuance of a new GCO, provided that the increase in maximum generation capacity does not exceed 15% and the new technical characteristics do not impose a greater burden on the grid compared with those on the basis of which the original GCO was granted.

As a general rule, a new GCO must be issued within two months from the expiry of the 20-day period for requesting supplementary information or,

where such information is requested, from its submission; a new Installation Licence is subject to a 20-day review period followed by a 10-day issuance period running from the expiry of that period or of the deadline set for supplementary information; and a new single-text GCA must be concluded within 45 days of the application. Failure to provide requested supplementary information in time renders the GCO application inadmissible. Shorter deadlines apply within REAAs, including 10-day periods for the GCO and Installation Licence procedures and a 30-day deadline for the GCA.

The existing possibility of installing an electricity storage unit as part of a repowering project, through the corresponding amendment of the Producer Certificate, Special Projects Certificate or production licence, is retained.

The overall licensing and grid connection process may not exceed 12 months outside REAAs (24 months offshore) and 6 months within REAAs (12 months offshore), subject to the extensions expressly available for the relevant category in duly justified exceptional circumstances.

A pre-existing rule with major commercial consequences remains in place: stations initiating a repowering process from 31.10.2024 onwards - i.e. filing an application to renew their Producer Certificate, Special Projects Certificate or production licence or, for exempted stations, an application for a new GCO - may participate only in the electricity market and are no longer eligible for operating support throughout the lifetime of the repowered installation (Article 42(7) of Law 4951/2022, introduced by Law 5151/2024).

V. What Developers and Investors Should Do Now

The practical starting point is a portfolio review against four questions: **(i)** which applications were, or will be, filed after 5 May 2026 and therefore fall under the new time limits; **(ii)** whether the site and technology fall within a designated REAA and comply with its mitigation measures; **(iii)** which GCO milestones are approaching - in particular, where applicable, the need to file

complete applications for both the GCA and the Installation Licence within the GCO's validity, the 30 April 2026 rule for Special Projects and the collective readiness conditions for shared EHV substations; and **(iv)** whether a contemplated repowering is caught by the market-only rule. Lenders and investors will also want the time-limit assumptions in project models to reflect the excluded periods and the absence of a general deemed-approval mechanism.

Koutalidis Law Firm's Energy and Infrastructure team advises developers, investors and lenders on RES permitting, grid connection and project structuring in Greece. For questions on the permitting route, transitional rules or grid connection milestones applicable to your project, please contact encourakis@koutalidis.gr

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