

Governing the NGEU in Spain: Energy Policy Implementation and Territorial Recentralisation

Ignasi Carol Abril

Universitat Autònoma de Barcelona

ignasicarol@gmail.com

ORCID: 0009-0008-6029-3526



Reception: 19/06/2025

Acceptance: 19/01/2026

Publication: 29/01/2026

Recommended citation: CAROL ABRIL, I. (2026). "Governing the NGEU in Spain: Energy Policy Implementation and Territorial Recentralisation". *Quaderns IEE: Revista de l'Institut d'Estudis Europeus*, 5(1), 103-125. DOI: <<https://doi.org/10.5565/rev/quaderns.iee.129>>

Abstract

The energy transition was a central pillar in the design of the Next Generation EU (NGEU), conceived to address Member States' structural challenges and to promote more sustainable and democratic economies. While existing research has largely focused on assessing the achievement of environmental targets, the broader impact of these funds on national governance systems remains underexplored. In key policy areas such as the energy transition, questions arise regarding how authority over resources and their implementation has been distributed across levels of government.

This paper examines the formal and practical governance structures of energy policy in Spain within the framework of the NGEU. Drawing on European implementation studies, the analysis shows a trend towards the centralisation of decision-making authority by the national government, while regional authorities retain limited capacity to effectively articulate and channel their demands through vertical governance mechanisms. The findings suggest that, rather than fostering more cooperative and decentralised arrangements, the implementation of the NGEU in the energy sector has reinforced pre-existing centralising dynamics in Spanish energy governance.

Keywords: Energy governance; Territorial governance; EU policy implementation; Multilevel governance; Europeanization; Spain; European funds.

Resumen. *La gobernanza del NGEU en España: implementación de la política energética y recentralización territorial*

La transición energética fue un pilar central en el diseño del Next Generation EU (NGEU), concebido para hacer frente a los retos estructurales de los Estados miembros y promover economías más sostenibles y democráticas. Si bien la literatura existente se ha centrado en gran medida en evaluar el grado de cumplimiento de los objetivos medioambientales, el impacto más amplio de estos fondos sobre los sistemas nacionales de gobernanza sigue estando insuficientemente explorado. En ámbitos clave de política pública como la transición energética, surgen interrogantes sobre cómo se ha distribuido la autoridad sobre los recursos y su implementación entre los distintos niveles de gobierno.

Este artículo analiza las estructuras formales y prácticas de gobernanza de la política energética en España en el marco del NGEU. A partir del enfoque de los estudios sobre implementación europea, el análisis pone de relieve una tendencia hacia la centralización de la autoridad decisoria por parte del gobierno central, mientras que las autoridades regionales disponen de una capacidad limitada para articular y canalizar eficazmente sus demandas a través de los mecanismos de gobernanza vertical. Los resultados sugieren que, lejos de fomentar arreglos más cooperativos y descentralizados, la implementación del NGEU en el ámbito de la energía ha reforzado dinámicas centralizadoras preexistentes en la gobernanza energética española.

Palabras clave: Gobernanza energética; Gobernanza territorial; Implementación de políticas de la UE; Gobernanza multinivel; Europeización; España; Fondos europeos.

Resum. *La governança del NGEU a Espanya: implementació de la política energètica i recentralització territorial*

La transició energètica va ser un pilar central en el disseny del Next Generation EU (NGEU), concebut per fer front als reptes estructurals dels estats membres i promoure economies més sostenibles i democràtiques. Tot i que la literatura existent s'ha centrat principalment en avaluar el grau d'assoliment dels objectius mediambientals, l'impacte més ampli d'aquests fons sobre els sistemes nacionals de governança continua sent poc explorat. En àmbits clau de política pública com la transició energètica, sorgeixen interrogants sobre com s'ha distribuït l'autoritat sobre els recursos i la seva implementació entre els diferents nivells de govern.

Aquest article analitza les estructures formals i pràctiques de governança de la política energètica a Espanya en el marc del NGEU. A partir de l'enfocament dels estudis sobre implementació europea, l'anàlisi posa de manifest una tendència cap a la centralització de l'autoritat decisòria per part del govern central, mentre que les autoritats regionals disposen d'una capacitat limitada per articular i canalitzar de manera efectiva les seves demandes a través dels mecanismes de governança vertical.

Els resultats suggereixen que, lluny de fomentar arranjaments més cooperatius i descentralitzats, la implementació del NGEU en l'àmbit energètic ha reforçat dinàmiques centralitzadores preexistents en la governança energètica espanyola.

Paraules clau: Governança energètica; Governança territorial; Implementació de polítiques de la UE; Governança multinivell; Europeïtzació; Espanya; Fons europeus.

Summary

1. Introduction
 2. State of the art
 3. Theoretical framework
 4. Analysis
 5. Conclusions
 6. References
-

1. INTRODUCTION

On December 14, 2020, the European Union adopted the Next Generation EU (hereinafter, NGEU), an unprecedented recovery package aimed at revitalizing the continent's economy. A total of €750 billion, primarily financed through a new instrument called the Recovery and Resilience Facility (hereinafter, RRF), was made available to Member States to address the immediate effects of the pandemic and, more importantly, to transform and strengthen their economies in the long term. The objective was to enable Member States to emerge from the crisis better prepared and more aligned with the demands of the future. Among the key areas of action, the green and digital transitions became central pillars of the programme. Within this framework, advancing the energy transition carried significant weight, a priority that gained even greater importance in 2022 following Russia's aggression against Ukraine and the subsequent introduction of the REPowerEU programme. Overall, far from being merely a financial package, the NGEU initiative sought to address the structural challenges of Member States and propel them towards more equitable, democratic, and sustainable economies. Whether these objectives translate into more inclusive and decentralised governance arrangements at the domestic level remains an open empirical question.

Spain was allocated €72 billion from the NGEU funds, making it the second-largest recipient in absolute terms within the European Union.¹ In drafting its National Recovery and Resilience Plan, a key document required to access the resources,² Spain determined that 39.6% of its total investments would be directed to the green transition. Projects directed towards the energy transition have played a central role

¹ Aggregate data on allocations, disbursements, milestones and targets under the Recovery and Resilience Facility are published and regularly updated by the European Commission through the Recovery and Resilience Scoreboard, which provides a comparative overview across Member States. See European Commission, *Recovery and Resilience Scoreboard*, available at https://ec.europa.eu/economy_finance/recovery-and-resilience-scoreboard/index.html

² The Spanish National Recovery and Resilience Plan (Plan de Recuperación, Transformación y Resiliencia) was submitted by the Government of Spain and approved by the European Commission on 16 June 2021. The official documentation, including the Executive Summary in English and the Commission's assessment, is available on the European Commission's Recovery and Resilience Facility country page for Spain: https://commission.europa.eu/business-economy-euro/economic-recovery/recovery-and-resilience-facility/country-pages/spains-recovery-and-resilience-plan_en

in this area, with Pillar III of the Plan entirely dedicated to them and accounting for €4.047 billion of the invested funds so far.³

Another key issue in Spain was the governance of the funds, particularly given the complex territorial distribution of powers among its regional units, the Autonomous Communities (hereinafter, CCAA). In this sense, the proportion of funds directly overseen by the CCAA is significant. As of December 31, 2024, 33.30% of the total assigned funds corresponded to the CCAA, which were also responsible for having managed 25.98% of the funds that had already been disbursed.⁴ Notably, the territorialization of the NGEU resources has primarily been executed by the CCAA and local entities, rather than the central state administration, whose calls for proposals have rarely been targeted at a specific region (Hidalgo Pérez, 2022, p.14). However, as the implementation process progressed, regional governments have increasingly claimed that they are being excluded from decision-making regarding the allocation of funds, projects, and reforms. They accuse the central government of unilaterally deciding the strategic priorities and the projects to finance, reducing the role of the CCAA to the mere instrumental activity of distributing resources in their own territories.⁵ If true, this would create a paradoxical situation in which the governmental units responsible for a significant part of the fund's execution are excluded from the policy-making process that defines it. This tension raises broader questions about whether the governance arrangements associated with the NGEU have genuinely fostered more inclusive and cooperative forms of territorial governance, or whether they have instead reinforced pre-existing centralising dynamics within the Spanish state.⁶

In light of the above, this paper examines the territorial governance of Pillar III, specifically targeting energy transition, of the Spanish National Recovery and Resilience Plan (hereinafter, NRRP). The research poses the question of whether the implementation of the funds has fostered cooperative and non-hierarchical forms of governance, aligning with EU objectives, or whether it has led to the opposite.

³ For official background on Spain's allocation of Next Generation EU funds and the National Recovery and Resilience Plan, including strategic priorities such as the green transition, see the Spanish government's Recovery Plan portal: *Plan de Recuperación, Transformación y Resiliencia*, Gobierno de España (2021–2026), available at <https://planderecuperacion.gob.es/>

⁴ Official data on the territorial allocation and management of Recovery and Resilience Facility funds by the Autonomous Communities are published by the Spanish government. For detailed information on the volume of investments managed by the CCAA and their share of total assigned and disbursed funds, see *Mapa de inversiones gestionadas por las Comunidades Autónomas*. For the technical criteria governing the distribution of funds among the CCAA, see *Criterios de distribución de fondos a las Comunidades Autónomas*, Gobierno de España, available at <https://planderecuperacion.gob.es/ejecucion/mapa-de-inversiones-gestionadas-por-las-comunidades-autonomas> and <https://planderecuperacion.gob.es/ejecucion/criterios-distribucion-fondos-ccaa>

⁵ Statements expressed in official communications by the Conference of Presidents and the sectoral conferences related to the Recovery and Resilience Plan during 2021–2022.

⁶ For official and regularly updated data on the territorial allocation and implementation of the Recovery and Resilience Plan by Autonomous Community, see the Spanish government's monitoring portal: *Seguimiento del Plan de Recuperación por comunidad autónoma*, available at <https://planderecuperacion.gob.es/ejecucion/seguimiento-del-plan-de-recuperacion-por-comunidad-autonoma>

Accordingly, the investigation is guided by the following hypothesis: The implementation of energy transition policies in Spain, within the framework of the NGEU, reflects a process of territorial recentralisation that builds upon and intensifies pre-existing patterns of energy governance. In doing so, the paper also contributes to broader debates on Europeanization, multilevel governance, and EU implementation by examining how large-scale EU distributive instruments interact with domestic institutional structures. Hence, the paper is structured as follows: the next section provides a literature review, summarizing the current state of knowledge on energy governance in Spain and the country's historical relationship with EU funds. This is followed by a discussion of the theoretical and analytical framework, the methodological approach, and the empirical analysis. Finally, the paper concludes with a set of findings.

Beyond assessing policy outcomes, this article examines the gap between the territorial execution of NGEU-funded energy policies and the effective distribution of decision-making authority across levels of government. By focusing on the energy transition—one of the most strategically and financially significant pillars of the Spanish NRRP—the analysis shows how the implementation of European recovery instruments can reinforce centralising dynamics even in policy areas traditionally associated with multilevel and decentralised governance.

2. STATE OF THE ART

Environmental protection and a successful energy transition have become increasingly crucial in Spain due to various factors. The country's geographical and environmental conditions make it particularly vulnerable to climate change, with rising temperatures, advancing desertification, and sudden environmental disasters such as floods, droughts, and wildfires. Regarding energy, Spain has limited domestic resources, and its geography—especially the Pyrenees—creates significant obstacles to connectivity with external suppliers (Campos-Martín *et al.*, 2022, p.1149). Spain's economy is heavily reliant on external energy, and a significant share of its energy consumption is closely tied to economic growth. (Bellver *et al.*, 2019). Key sectors, "including industry, tourism, transport, and agriculture, are considered potentially problematic for the environment" (Galera Rodrigo *et al.*, 2023, p.263), while the number of households suffering from energy poverty remains relatively high (Campos-Martín *et al.*, 2022). Consequently, achieving energy independence and sustainability is deemed essential in the country.

However, along with other Mediterranean nations, Spain has traditionally been regarded as a laggard in implementing environmental policies within the EU (Fernández *et al.*, 2010, p.560). They have historically lacked a specific strategy to tackle environmental and energy challenges, and their actions have been framed by international commitments and, mainly, EU legislation (García-Ureta & Lasagabaster, 2014, p.127). In addition, Spain shows significant deficiencies in efficiently managing

large volumes of funds from European origin. Under the 2014–2020 Multiannual Financial Framework, prior to the NGEU, Spain ranked at the bottom in the absorption capacity of European funds (Martín-Llaguno, Vilaplana-Aparicio, & Gandía-Solera, 2022). Analyses have identified several causes for this situation, which include structural factors, such as the administrative capacity of public institutions (Viñé, 2021), the degree of cooperation between private and public sectors, regional disparities, and a lack of engagement by political elites (Vilaplana, Iglesias, & Martín, 2019); as well as planning factors, encompassing mistakes and failures that go from project selection, with 22% of funds unallocated as of 2019, to the fulfilment of objectives required by the European Commission (Hidalgo Pérez, 2020, p.6). As a result, the resources from the RRF represented not only a valuable opportunity to transform and improve the economy, but also a significant challenge for the Spanish public administration. Substantial changes were necessary, and this became a pivotal factor when establishing structure of governance for the RRF.

As regards territorial control over energy, the Spanish constitutional framework establishes a somewhat ambiguous distribution of powers, characterized by shared competencies between the State and CCAA in the case of environmental protection, but a centralised governance for energy policies. Meanwhile, operational and administrative implementation is entrusted to regional and local administrations in both cases (García-Ureta & Lasagabaster, 2014, p.115). Nevertheless, the cross-cutting nature of environmental and energy policies introduced a degree of flexibility and facilitated a process of decentralisation following the establishment of the Spanish democracy and, more notably, after the country's accession to the European Communities (Mora Ruíz, 2023, p.130). Relevant domestic changes appeared regarding the territorial structure of the policy, "giving rise to new decision-making and implementation centres at national, regional, and local levels" (Fernández *et al.*, 2010, p.564). Cooperation channels between different levels of government were also fostered, and available data indicate that environmental and energy policy were rarely a source of institutional conflict (García-Ureta & Lasagabaster, 2014, p.119). Moreover, since the beginning of the century "all CCAA adopted climate policies through general and specific strategies, plans, and programmes", showing that "the Spanish State of Autonomies provided a favourable context for dynamic horizontal processes of climate policy diffusion" (Galera Rodrigo *et al.*, 2023, p.276).

Despite this, substantial changes following the 2008 financial crisis suggest that the trend towards dispersing authority had limited impact, and there is certain academic consensus supporting the idea that the decade preceding the pandemic was characterized by a process of recentralisation. Firstly, channels of cooperation between the central government and regional authorities have proven to be ineffective. The Senate (Spanish territorial chamber), on the one side, does not "play a substantial role in designing coherent environmental policies" (García-Ureta & Lasagabaster, 2014);

Sectoral Conferences (Conferencias Sectoriales),⁷ on the other hand, fail to serve as a forum for reaching regulatory agreements and are generally criticized by regional authorities (Alberton, 2020). For instance, the Sectoral Conference on Energy only had one meeting during the preparation of the National Climate and Energy Plan between 2018 and 2019 (Ramos, Alda, & Cicuéndez, 2019). Secondly, institutional conflict intensified after 2008, with frequent challenges between the State and the CCAA over each other's laws, in which the Constitutional Court often ruled in favour of the central government (Alberton, 2021). These rulings were not without controversy, as the Court's interpretations are rooted in a legal doctrine established when the energy system relied heavily on nuclear and fossil fuels, but increasingly outdated in the current context of promoting renewable energy (Galera Rodrigo, 2018, p.253). In this line, Catalonia's Climate Change Law,⁸ the first one enacted by an autonomous community, was partially invalidated by the Court arguing that key provisions overstepped the energy sector's jurisdiction (Galera Rodrigo *et al.*, 2023, p.277). Thirdly, environmental legislation enacted by the central government shows an expansion of powers that oversteps on CCAA responsibilities (Casado Casado, 2018).

In summary, the territorial structure of energy policy prior to the pandemic reflected a highly decentralised administrative state, where implementation powers were granted to CCAA for matters previously and unilaterally regulated by the central government (Casado Casado, 2018). However, regional authorities lacked sufficient autonomy to develop distinctive environmental policies of their own, and they also lacked efficient vertical mechanisms to convey their demands to the State. In this context, the country's limited capacity to absorb European funds placed Spain in a challenging position when it came to managing the RRF resources.

Considering this, the paper poses the following research questions: What has been the territorial governance of the RRF, and the regulations implemented in the energy sector? Does the process of recentralisation persist, or, in line with EU objectives, has there been a shift towards cooperative and non-hierarchical forms of governance? To address these questions, this article draws on European implementation studies as an analytical framework to examine governance arrangements and implementation dynamics.

3. THEORETICAL FRAMEWORK

Since the 1970s, and with a marked increase in the 1990s, significant scholarly attention has been paid to the phenomenon of Europeanization, defined as “the reorientation or reshaping of politics in the domestic arena in ways that reflect policies, practices and preferences through the EU system of governance” (Arregui, 2022, p.6).

⁷ Spanish Sectoral conferences consist of “multilateral cooperation bodies for specific policy sectors that bring together the central government and the CCAA” (Galera Rodrigo *et al.*, 2023, p.270).

⁸ BOE (28 de agosto de 2017). *Ley 16/2017, de 1 de agosto, del cambio climático. Comunidad Autónoma de Cataluña*. Boletín Oficial del Estado.

In this sense, research in the environmental field suggested that the EU has had a positive effect in shifting policy-making patterns within Member States, moving away from hierarchical, command-and-control approaches towards a predominantly network-based model that relies on cooperation (Börzel, 2009). But results in this regard, despite deliberate community efforts towards harmonization, vary widely among Member States. Accordingly, a broad consensus has emerged around the notion that the extent of Europeanization results from a dual interaction. On the one hand, it is driven by adaptational pressures stemming from EU mechanisms; on the other, by domestic variables such as organizational and political cultures embedded within national institutions (Wallace, *et al.*, 2005, p.40).

In this context, implementation studies focus on the domestic application of European policies, analysing “the extent to which Member States have effectively adapted their internal structures, patterns of public policy making, and beliefs to the European path” (Fernández *et al.*, 2010, p.559). Accordingly, non-compliance with European law has sparked extensive scholarly discussions. These focus on the conditions and variables that act either as drivers of or barriers to Europeanization (Toshkov, Knoll & Wewerka, 2010). Implementation, however, is an inherently complex process influenced by numerous factors and capable of taking diverse forms, and the original objectives of certain policies can sometimes produce unintended countereffects at the domestic level.

Accordingly, this article examines the implementation of the RRF through the lens of EU implementation studies, analysing how it has been operationalized within a decentralised member state and paying particular attention to the gap between formally established governance arrangements and their practical functioning.

From an analytical perspective, European implementation studies draw on concepts and variables from national political analysis. A basic notion in this regard is the distinction between legal transposition of EU policies, the process by which EU law is converted into domestic codes to ensure formal compliance, and practical implementation, referring to the actual application of policies by the administrative actors and the achievement of intended outcomes (Thomann & Sager, 2017). Analyzing both dimensions is crucial to understand the governance established over implementation processes.

For example, early studies on the NGEU Europeanization effects in Spain suggest a “trade-off between the protection of public values and the fulfilment of policy goals” (Fernández Pasarín & Lanaia, 2022, p.43). Grounded on these debates, this research draws attention to the diverse impacts EU policies have on governance patterns within Member States.

In this article, formal governance refers to the legally and institutionally established allocation of decision-making authority among actors, as defined in laws, regulations, and official procedures. Practical governance, by contrast, captures how these arrangements operate in practice, including informal power relations, patterns

of interaction, and the effective capacity of actors to influence decisions during implementation.

The analysis draws primarily on official documents, legislative texts, government reports, and secondary sources, which are systematically examined to capture both the formal design of governance structures and their practical operation.

Hence, this research is a qualitative analysis that focuses on official documents and secondary resources referring to the Spanish governance of energy policies boosted by the NGEU. This article adopts the analytical perspective of European implementation studies, distinguishing between the formally established structure of governance and its operation in practice, including the effective distribution of authority and influence among actors. Accordingly, the research first examines “the specific organization that allocates decision-making power among the actors involved and defines their specific roles” (Ottone & Barbieri, 2023, p.3). Secondly, the practical implementation of Pillar III of the NRRP is analyzed. Considering the formal structure of governance, this second part will focus on established channels of cooperation between the CCAA and the central government, evaluating the capacity of these channels to act as bottom-up conduits for the proposals and demands of regional governments, and thus assessing their relative influence on central government decisions. The identified centralising dynamics will be distinguished considering, on the one side, those that were already present in Spain's energy governance system prior to the NGEU funds, and, on the other hand, those that have emerged as a consequence of, or in response to, the challenge of managing these unprecedented resources.

4. ANALYSIS

Following the distinction outlined above between formal and practical governance, the analysis first examines the institutional design of the governance framework for the NGEU in Spain and subsequently focuses on how these arrangements have operated in practice during the implementation of energy transition policies.

4.1. Formal structure of governance

A few months before submitting the NRRP to the European Commission, the Spanish government enacted Royal Decree Law 36/2020, establishing a governance structure for managing NGEU funds. This structure was later integrated into the NRRP, which, despite receiving final approval, initially requested clarifications regarding the implementation capacity, governance arrangements, and the specification of certain investments and reforms (European Commission, 2021).

The governance framework established a structure “combining a vertical chain of command with horizontal ministerial responsibility”. As shown in Figure 1, a

Commission for the NRRP, chaired by the Spanish President and composed of cabinet ministers, was created to direct and coordinate the entire programme and to take final decisions on project approval. Its work was to be supported by three additional bodies: a Technical Committee, responsible for “preparing and proposing technical adjustments for the implementation”; the Sectoral Conference on the NRRP, to “channel regional and local participation”; and a Monitoring Body, tasked with “supervising” the plan's progress and “reporting to the Presidency” (Gobierno de España, 2020). Moreover, a new Secretariat General for European Funds was created for the coordination of the implementation process among authorities, both in horizontal terms, between ministries, and in vertical terms, with the CCAA and lower levels of government. Besides this, cooperation with CCAA would occur through the existing thematic sectoral conferences, based on the areas of competence—in the case of Pillar III, this refers to the Sectoral Conference on Energy, coordinated by *the Ministerio para la Transición Ecológica y el Reto Demográfico* (hereinafter, MITECO)—. Additionally, a new mechanism, the *Proyectos Estratégicos para la Recuperación y Transformación Económica (PERTE)*,⁹ was introduced to promote public-private collaboration in strategic economic sectors, and ministries were instructed to launch “calls for expressions of interest” during the initial stages of the NRRP, an instrument borrowed from the European Commission and aimed, in the Spanish case, at both the private sector and regional and local governments.¹⁰

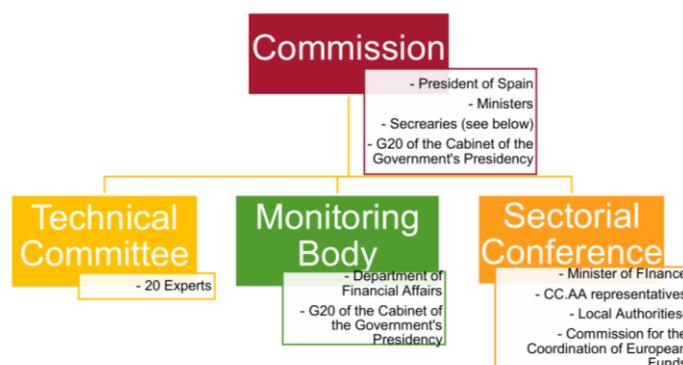


Figure 1: Adapted from Bonissoni, 2021

Several points can be drawn from this structure of formal governance. First, apart from the General Secretariat for European Funds, whose primary objective is to coordinate the implementation process, the already existing framework of sectoral conferences was utilized as the main forum to channel regional participation, with the creation of an *ad-hoc* conference specifically for the Plan and relying on other thematic

⁹ Strategic Projects for Resilience and Economic Transformation.

¹⁰ For an official explanation of the calls for expressions of interest (*manifestaciones de interés*) introduced during the initial stages of the National Recovery and Resilience Plan as a mechanism to gather input from the private sector and regional and local authorities, see the Spanish government's Recovery Plan portal: Gobierno de España, *Manifestaciones de interés*, available at <https://planderecuperacion.gob.es/como-acceder-a-los-fondos/manifestaciones-de-interes>

conferences for its subsequent implementation. However, as previously discussed, there is academic evidence highlighting the shortcomings of these instruments. In this sense, scholars had previously identified that the central government holds a predominant power to set the agenda in these meetings —this occurs in 92% of cases— leading CCAA to favour other forms of cooperation like Bilateral Conferences, which later are barely a forum for discussing environmental policies (Abellán, 2015). Moreover, sectoral conferences are described as "bodies that function as coordination mechanisms for administrations, making them often the least suitable venue for equal cooperation between the State and the Communities". As a result, prior to the pandemic the weight of achieved agreements over government regulations was increasingly lower (Alberston, 2020). Given these circumstances, the only mechanisms that could potentially meet the demands of the regional governments are the so-called "calls for expressions of interest". Nevertheless, at least from a formal standpoint, these forums appear to be more of a tool to engage private stakeholders during the early stages of project planning, rather than a practical resource for regional or local entities.

Secondly, the position of the newly established Sectoral Conference does not place it directly within the decision-making and deliberative body concerning the NRRP. This institutional design, to some extent, limits the role of regional actors to discussions among themselves, while more direct ways to present their proposals to the decision-making body—even without real authority—could increase the chances of their demands being considered (Bonisconi, 2021). That is, splitting decision-making and regional participation into two separate bodies distances the latter from the actual governance of the Plan.

Thirdly, and most importantly, the fragmentation of regional coordination across various thematic conferences does not benefit regional governments. It requires them to allocate their administrative resources across multiple meetings and diminishes their ability to concentrate their negotiating capacity within a single body. This is particularly relevant when discussing the allocation of funds, which, as will be analysed later, has become one of the primary functions of these conferences. In contrast, according to Fernández Pasarín and Lanaia (2022), this governance model changes the logic of distribution of resources, the primacy of territorial criteria being supplanted by the policy criteria, meaning that CCAA would benefit in relation to the territorial dimension of each of the policy levers. This is why, despite the criteria for distributing most of the funds having been agreed in the corresponding sectoral conferences, the whole territorial allocation caused significant controversy among the Spanish opposition, appealing to the Ministry of Finance to justify and publish the technical criteria behind this distribution.¹¹

¹¹ The political controversy surrounding the territorial allocation of Recovery and Resilience Facility funds led the Spanish government to publish detailed information on allocation criteria and implementation progress. For official documentation and technical explanations regarding the distribution of funds across policy areas and territories, see the Government of Spain's Recovery Plan transparency and monitoring portal: *Plan de Recuperación, Transformación y Resiliencia*, Gobierno de España, available at <https://planderecuperacion.gob.es/>

Overall, what can be observed at a formal level is a continuation of the trend towards re-centralisation that had previously characterized territorial governance, at least in relation to energy policies. While it may be an overstatement to claim that this trend has intensified, the reality is that the proposed mechanisms do not significantly alter the established governance framework, nor do they effectively counterbalance the re-centralising tendencies that have long characterised territorial governance in Spain.

4.2. Practical governance of Pilar III of the NRRP

Despite these concerns about insufficient territorial representation in the formal governance of the NRRP, the Spanish programme was approved and positively assessed by the European Commission, which considered the governance arrangements to be broadly adequate at the time of approval. However, as implementation progressed, the Commission increasingly pointed to implementation challenges, including coordination across levels of government, during the monitoring of the Plan (European Commission, 2022).

To better understand these grievances, it is therefore essential to focus on the stage of practical implementation, particularly on the functioning of the formally established cooperation channels for the participation of regional governments.

4.2.1. Sectoral Conference on the NRRP

As of December 2023, 161 sectoral conferences had been held to address issues related to the Recovery Plan. As previously stated, these meetings allowed for negotiations with the CCAA in each policy lever, but hindered a broader discussion of the Plan's general orientation. One year later, by December 2024, the NRRP Sectoral Conference, the mechanism specifically created to target these broader discussions, had convened only four times.

Of these four meetings, only two took place before the Plan's submission to the European Commission, the critical period covering the first months of 2021, up until April. Hence, during the development of general guidelines for reforms and investments, the primary body responsible for accommodating territorial demands was convened just twice. Moreover, both meetings were held on dates that indicate limited influence on the drafting of the Plan. The first one, held in January, took place during the development of the initial version, which the EU later criticized as vague and lacking detail. The second meeting, in mid-April, occurred after the central government had already completed a revised version of the Plan and served primarily as a forum for presenting this project. Consequently, regional authorities had minimal opportunity to contribute to the drafting of the NRRP through the Sectoral Conference. This became even more evident when the conference was not convened during the

preparation of the Plan's Addendum, a project proposed at the end of 2022 and approved in mid-2023.¹²

Furthermore, after the Plan received EU approval, the Conference was convened for purposes other than facilitating regional participation in the governance of the programme. The third meeting, held in the summer of 2021, primarily aimed to establish the Plan's management and monitoring system, which reflects a predominantly top-down coordination approach, centred on transmitting directives from the central government to the CCAA. Similarly, the fourth meeting, in 2024, took place in relation to the Regional Resilience Fund (*Fondo de Resiliencia Autonómica*), an instrument designed to "improve access to financing for Spain's CCAA", meaning that fund distribution, rather than achieving normative agreements, was the main objective.¹³

In summary, the relative influence of Spain's CCAA in the formulation of the NRRP has been very limited and the NRRP Sectoral Conference has functioned only marginally as a genuine mechanism for regional actors to convey their demands. It could be argued that the crisis context and the tight deadlines imposed by the European Commission were the main reasons for this situation during the initial drafting phase of the Plan. However, in a completely different context, with ample time for planning, regional governments were similarly excluded from the preparation of the Addendum. Furthermore, half of the Sectoral Conference meetings were not intended to promote proactive participation from regional governments. Instead, they served as spaces for the vertical transmission of directives and discussions on fund distribution. In this context, the specifically created mechanism for managing the NGEU inherits the existing problems and shortcomings of other sectoral conferences, while it also introduces the added challenge of being a tool with very limited prominence in key processes of the NGEU's implementation.

4.2.2. Sectoral Conference on Energy

The Energy Sectoral Conference has convened a total of ten times since early 2021. The first meeting took place during the preparation of the NRRP and focused on discussing specific initiatives to activate the first lines of the NRRP. Similarly, the five components of Pillar III have been addressed at some point during the ten sessions of the Conference. However, it is worth noting that the lack of transparency regarding the contributions of regional governments in these forums—official information is limited

¹² Official information on the dates, agendas and frequency of meetings of the Sectoral Conferences is published by the Spanish Ministry of Territorial Policy and Democratic Memory. See *Órdenes del día de las Conferencias Sectoriales*, available at https://mptmd.gob.es/portal/politica-territorial/autonomica/coop_autonomica/conf_sectoriales/ordenes-del-d-a-de-las-conferencias-sectoriales

¹³ For an official description of the objectives and functioning of the Regional Resilience Fund (*Fondo de Resiliencia Autonómica*, FRA), see NGEU-Assist, available at <https://www.ngeu-assist.com/es-es/contenido/1334/fondo-de-resiliencia-autonomica-fra>.

to the number of meetings, their agendas, and a few press releases prepared by the ministry itself, with no details on the proposals or demands of the autonomies—makes it difficult to assess their relative influence on the central government.

An analysis of the topics discussed, based on the meetings' agendas, suggests that the Energy Conference follows a similar dynamic to that of other sectoral conferences: a significant portion of its activity focuses on the distribution of resources, the coordination and transmission of guidelines, and, given the NGEU, the monitoring and oversight of the funds implemented by the CCAA. Notably, the Conference held on August 8, 2022, stands out for its command-and-control course, as it was convened on extremely short notice to ensure that regional governments acted in line with the recently approved Royal Decree-Law 14/2022, which established measures for energy savings and efficiency. This role—coordinating actions among the CCAA, deciding on fund allocation, and establishing top-down cooperation mechanisms—is legitimate and falls within the remit of sectoral conferences. However, as the territorialisation of funds has progressed, evidence suggests that even this task has not been carried out effectively. A report by the *Confederación Española de Organizaciones Empresariales* (CEOE, 2024) highlights that, in bodies such as the sectoral conferences, greater collaboration and information regarding the resources to be managed by CCAA is needed. According to this report, the lack of coordination leads to insufficient planning in fund management by some regional governments, directly impacting the results of implementation.

If we examine the outcomes in terms of regulatory agreements reached in the Energy Sectoral Conference, we can see that, in many cases, this forum serves to “build consensus” or “consult” with regional authorities on “special regulatory rules for the granting of aid” (Ministerio de Hacienda y Función Pública, 2021). In other words, the central government and regional authorities establish jointly the criteria and parameters for the calls that the CCAA will later execute, hence allowing the Ministry to coordinate and oversee the actions of the CCAA, ensuring that funds remain aligned with the Plan's objectives, while it also provides regional authorities the opportunity to discuss the criteria that will determine the projects implemented in their territories: a particularly relevant aspect in energy transition matters, as some projects may be conflictual at the local level. The remaining agreements within the framework of the NGEU concern, primarily, the direct allocation of funds by the State to a regional entity (Gobierno de España, 2021a) or technical issues related to the operational execution of funds by the CCAA, such as requests for deadline extensions in certain programmes (Gobierno de España, 2021b). Once again, no reference has been found to normative agreements that directly imply activities related to the central government.

Finally, it is worth noting that the massive transfer of funds to the CCAAs' administrations has not been accompanied by a corresponding transfer of power over those funds, meaning that authority over energy policy has not been meaningfully dispersed. In this sense, “the margin that CCAA have to adapt the calls to the real needs of each region is very limited”, which hinders their ability to connect with the

productive fabric. In this regard, there are instances where one project yields very different outcomes depending on the CCAA. For example, the PERTEs EHRA and VEC I and VEC II (strategic projects linked to renewable hydrogen and electric vehicles) have been criticized by businesses in the Navarra region for being poorly aligned with local needs, while in Extremadura, the private sector's participation in these programmes stands out positively (CEOE, 2024). This highlights that the transfer of funds to the CCAA—accounting for 33.30% of the funds assigned so far—does not equate to real governance over these funds by regional governments. Furthermore, this phenomenon underscores how the Energy Sectoral Conference has failed to effectively convey the proposals, demands, and needs of the regions in a vertical manner.

In summary, only a portion of the Energy Sectoral Conference meetings is dedicated to discussing specific elements of the Plan, providing an opportunity for the CCAA to present their positions. However, the number of agreements reached, and the breadth of their content remain very limited. Moreover, these discussions do not lead to greater involvement from the CCAA in the governance of the Plan, as they have minimal ability to adapt it during its implementation in their territories.

4.2.3. Calls for the expression of interest (MDI)

Calls for the Expressions of interest (hereinafter, MDIs, by their Spanish acronym)¹⁴ are an innovative mechanism in Spain, although commonly used by the European Commission. They are designed to open the early stages of policymaking to interested public and private stakeholders. Unlike public consultations, MDIs constitute a broader process aimed at shaping policies and public programmes by identifying the specific needs of regions and the business community. Their primary objective is therefore to define the general framework of a policy and to guide subsequent actions.

Within the framework of the NGEU, the Ministry for the Ecological Transition and the Demographic Challenge has launched twelve MDIs related to the energy transition. Five of these registered significant participation from regional and local authorities, three were exclusively targeted at private actors, and no information has been published regarding the level of regional participation in the remaining four. Overall, these instruments have enabled the Ministry to identify priority areas for intervention and to better understand the needs of both territories and the industrial sector. The published results of the MDIs largely align with the projects subsequently promoted by the central government, suggesting that they have been effective in shaping policy design and in directing calls towards mature and well-developed initiatives.¹⁵

¹⁴ Manifestaciones de Interés

¹⁵ For an official summary of the calls for expressions of interest (*Manifestaciones de Interés*, MDIs) launched by the Ministry for the Ecological Transition and the Demographic Challenge in the field of energy transition, including information on participation patterns and thematic priorities, see Ministerio

In some cases, such as the MDI aimed at identifying projects related to electric mobility—where 24% of the proposals were submitted by regional and local authorities—territorial participation has been particularly high. This suggests that MDIs can function as a channel through which lower levels of government transmit proposals vertically to the central administration. However, it is important to note that the content of these submissions is strictly technical rather than political, and that they take place in a highly competitive space shared with private actors, often involving hundreds of proposals. Moreover, the Ministry fully determines the scope and admissible content of the submissions, and there is no formal guarantee that participation will translate into concrete reforms or investments. Consequently, while MDIs allow for some adaptation of programmes to territorial needs, they do not constitute an instrument for decentralising the territorial governance of the RRF. From a territorial perspective, however, these instruments operate within a logic that is predominantly technocratic and competitive rather than territorially embedded, limiting their capacity to redistribute decision-making authority across levels of government. As summarised in Figure 2, the implementation of energy transition policies under the NGEU has reinforced pre-existing centralising dynamics in Spain's energy governance, while also introducing new mechanisms that further concentrate decision-making authority.

Figure 2. Centralisation trends in Spain's energy governance: continuity and intensification under the NGEU

Source: Author's own elaboration.

Governance stage	Centralization trends	Context of the trends
Constitutional allocation of powers	Decision-making power over energy policy is exclusively assigned to the central government.	Prior to NGEU
Structure of governance: general chain of command	Hierarchical chain of command. Monitoring functions of the Plan are also centralized.	New/Came with NGEU
Structure of governance: decision-making power	Exclusively delegated to the NRRP Commission (President and ministers). Sectoral Conference for the NRRP is a supplementary body, with no authority.	New/Came with NGEU
Structure of governance: channelling regional participation	No innovative mechanism has been created to solve the shortcomings that Sectoral Conferences presented previously. Dividing negotiations through thematic conferences hinders CCAA capacity to exert influence.	New/Came with NGEU
Practical governance: NRRP Conference involvement in State's decision-making	Limited influence in the development of the NRRP and no participation in the drafting of the Addendum. Important barriers for the CCAA to convey their demands vertically.	New/Came with NGEU
Practical governance: NRRP Conference content	Distribution of funds and technical aspects of implementation take the place of discussions about the government's activity.	Boosted/aggravated by NGEU
Practical governance: Energy Conference involvement in State's decision-making	Lack of involvement in the government's decision-making regarding the projects of the plan and the calls for investments. Lack of agreements to produce general legislation (reforms of the Plan).	Boosted/aggravated by NGEU
Practical governance: Energy Conference content	Top-down cooperation, transmission of guidelines and fund distribution take more space than discussions about the government's activity.	Boosted/aggravated by NGEU
Practical governance: MDIs involvement in State's decision-making	Mechanism with high capacity to vertically transmit preferences to the central government, but unable to decentralize authority.	New/Came with NGEU

para la Transición Ecológica y el Reto Demográfico (MITECO), *Resumen de las manifestaciones de interés en el ámbito de la transición energética* (2021b), available at https://www.prtr.miteco.gob.es/content/dam/prtr/es/participacion/20210528_mdис_resumen_v4_jma_tcm30-534709.pdf

5. CONCLUSIONS

This research has examined the extent to which Spain's energy policy under the NGEU framework reflects a process of recentralisation in territorial power relations. The findings reveal clear centralising tendencies, both in the formal governance arrangements and in the practical implementation of policy instruments. In this process, the central government consolidates decision-making authority, while regional governments face limited opportunities to effectively articulate their demands through vertical governance channels. Importantly, these dynamics do not constitute a radical break with the past, but rather extend and intensify patterns that were already present in Spain's energy governance prior to the pandemic. The scale of financial resources mobilised by the NGEU, together with the managerial requirements associated with their implementation, has amplified pre-existing centralising trends. At the same time, it has introduced new governance practices that were previously absent.

Beyond its empirical contribution, this study also carries relevant theoretical implications. The findings question simplified assumptions about the inherently decentralising or democratizing effects of EU intervention, showing instead how implementation dynamics and domestic institutional legacies shape the territorial effects of European recovery instruments. In particular, the analysis suggests that the NGEU—understood as a large-scale distributive programme—may foster centralisation in specific policy domains, depending on how its instruments are embedded within national governance structures.

More broadly, the Spanish case speaks to ongoing debates on EU distributive politics by illustrating how large-scale European recovery instruments may decouple financial execution from decision-making authority at the domestic level. In this sense, the NGEU not only reallocates resources, but also reshapes power relations across levels of government, reinforcing centralised control over strategic priorities even in formally decentralised systems. The findings further highlight the limits of multilevel governance in crisis-driven contexts, where urgency, administrative capacity constraints, and performance requirements tend to privilege hierarchical coordination over cooperative and territorially inclusive arrangements.

This study is not without limitations. The analysis relies primarily on official documents and secondary sources, which capture formal arrangements but offer limited insight into informal negotiations and power dynamics. Future research could address this gap through interviews with key actors involved in the negotiations and implementation of Pillar III, thereby providing a more fine-grained understanding of the recentralisation processes identified here. Moreover, given the sectoral focus on energy policy, further comparative research is needed to assess whether similar dynamics are observable in other policy areas affected by European recovery instruments. In this regard, the article contributes to broader debates on the conditions under which European initiatives reshape national governance structures, and on the

factors that enable—or constrain—territorial reconfiguration within multilevel systems.

6. REFERENCES

6.1. Bibliography

Abellán, M. Á. (2015). Un balance de la modernización autonómica y las tensiones intergubernamentales. *Cuadernos de Gobierno y Administración Pública*, 2(2), 165–185.

<https://revistas.ucm.es/index.php/CGAP/article/view/51571/47827>

Alberton, M. (2020). La praxis de las relaciones intergubernamentales en España. *Revista Catalana de Dret Ambiental*, 11(2), 1–44.

<https://www.raco.cat/index.php/rcda/article/view/378495>

Alberton, M. (2021). The swing of intergovernmental relations concerning environmental matters through the (un)balanced doctrines of the Constitutional Courts in Spain and in Italy. *Revista d'estudis autonòmics i federals*, (33), 15–57.

<https://dialnet.unirioja.es/servlet/articulo?codigo=8096312>

Arregui, J. (Ed.). (2022). *Europeanisation of public policies in Spain: Opportunities and challenges*. McGraw Hill. <https://hdl.handle.net/10230/54208>

Bellver, J., Linares, P., & Romero, J. C. (2019, April 11). *Informe sobre energía y sostenibilidad en España 2018*. Instituto de Investigación Tecnológica – Universidad Pontificia Comillas.

https://www.iit.comillas.edu/publicacion/informetecnico/es/122/Observatorio_de_Energ%c3%ada_y_Sostenibilidad_en_Espa%c3%b1a_Informe_basado_en_indicadores_Edici%c3%b3n_2018

Bonissoni, A. (2021, October 19). *The governance structures of Spain and Italy: Are their PNRRs overambitious?*. Real Instituto Elcano.

<https://www.realinstitutoelcano.org/en/analyses/the-governance-structures-of-spain-and-italy-are-their-pnrrs-overambitious/>

Börzel, T. A. (2009). New modes of governance and accession: The paradox of double weakness. In *Coping with accession to the European Union: New modes of environmental governance* (pp. 7–31). Palgrave Macmillan.

https://link.springer.com/chapter/10.1057/9780230245358_2

- Campos-Martín, J. M., Crespo, L., & Fernández, R. M. (2022). *Energy governance in Spain*. In *Handbook of energy governance in Europe* (pp. 1121–1156). Springer. <https://keele-repository.worktribe.com/output/535349/energy-governance-in-spain>
- Casado Casado, L. (2018). *La recentralización de competencias en materia de protección del medio ambiente*. Generalitat de Catalunya, Institut d'Estudis de l'Autogovern. <https://presidencia.bibliotecadigital.gencat.cat/handle/20.500.14623/409>
- Fernández, A. M., Font, N., & Koutalakis, C. (2010). *Environmental governance in southern Europe: The domestic filters of Europeanisation*. *Environmental Politics*, 19, 557–577. <https://doi.org/10.1080/09644016.2010.489711>
- Fernández Pasarín, A. M., & Lanaia, A. (2022). The Europeanisation effects of the Next Generation EU Plan in Spain: Opportunities and challenges. In *Europeanisation of public policies in Spain: Opportunities and challenges* (pp. 37–54). McGraw Hill. <https://portalrecerca.uab.cat/en/publications/the-europeanisation-effects-of-the-next-generation-eu-plan-in-spa/>
- Galera Rodrigo, S. (2018). *Las competencias en materia de clima: la complejidad jurídica del gobierno multinivel*. En S. Galera Rodrigo & M. del Mar Gómez Zamora (Eds.), *Políticas locales de clima y energía: teoría y práctica* (pp. 215–254). Instituto Nacional de Administración Pública. <https://vlex.es/vid/competencias-materia-clima-complejidad-741976373>
- Galera Rodrigo, S., Alda-Fernandez, M., & Kölling, M. (2023). Climate governance and federalism in Spain. In *Climate governance and federalism: A Forum of Federations comparative policy analysis* (pp. 263–284). Cambridge University Press. <https://doi.org/10.1017/9781009249676.014>
- García-Ureta, A., & Lasagabaster, I. (2014). Environmental governance in Spain. In M. Alberton & F. Palermo (Eds.), *Environmental protection in multi-layered systems: Comparative lessons from the water sector* (pp. 113–133). April 2014, *Publius The Journal of Federalism*, 44(3). <https://doi.org/10.1093/publius/pju022>
- Hidalgo Pérez, M. (2020). *Cinco propuestas para una mejor absorción de los fondos europeos* (EsadeEcPol Policy Brief #3). Esade – Center for Economic Policy. <https://www.esade.edu/ecpol/es/publicaciones/esadeecpol-policy-brief-fondos-europeos/>

- Martín-Llaguno, M., Vilaplana-Aparicio, M. J., & Gandía-Solera, I. (2022). European funds at the level of the Spanish autonomous communities: Is administrative communication discouraging open innovation?. *Journal of Open Innovation: Technology, Market, and Complexity*, 8(3), Article 124.
<https://doi.org/10.3390/joitmc8030124>
- Mora Ruiz, M. (2023). Climate change, energy transition and territorial decentralisation in Spain. *Revista d'estudis autonòmics i federals*, (37), 127–155.
<https://www.raco.cat/index.php/REAF/article/view/418269>
- Ottone, V., & Barbieri, M. (2023). Implementation arrangements for research and innovation policies in the Italian, Spanish, French, and German national recovery plan: A comparative analysis of emerging challenges for multi-level governance. *Review of Policy Research*, 42(2), 234–251.
<https://doi.org/10.1111/ropr.12592>
- Ramos, J. A., Alda, M., & Cicuéndez, R. (2019). The institutionalized dimension of intergovernmental relations in the *Estado Autonómico*. In L. López Nieto (Ed.), *Intergovernmental relations in democratic Spain: Interdependence, autonomy, conflict and cooperation* (pp. 377–396). Dykinson.
- Thomann, E., & Sager, F. (2017). Moving beyond legal compliance: Innovative approaches to EU multilevel implementation. *Journal of European Public Policy*, 24(9), 1253–1268. <https://doi.org/10.1080/13501763.2017.1314541>
- Toshkov, D., Knoll, M., & Wewerka, L. (2010). *Connecting the dots: Case studies and EU implementation research* (Working Paper No. 10/2010). Institute for European Integration Research, Austrian Academy of Sciences.
<https://eif.univie.ac.at/downloads/workingpapers/wp2010-10.pdf>
- Vilaplana, M. J., Iglesias, M., & Martín, M. (2019). *Communication measures that companies receiving regional R&D&I grants must comply with*. In *Profundizando en Temas de Investigación de Vanguardia* (pp. 417–427)
- Viñé, L. (2021). *Administrative capacity and European Funds absorption capacity in Spain*. Leiden University.
<https://studenttheses.universiteitleiden.nl/access/item%3A3239516/view>
- Wallace, H., Wallace, W., & Pollack, M. A. (Eds.). (2006). *Policy-making in the European Union* (5th ed.). Oxford University Press.

6.2. Legislation and Policy Documents

CEOE (Oficina de Proyectos Europeos). (2024). *Informe de seguimiento de los fondos Next Generation EU en España – Sexto informe* (Marzo 2024). Confederación Española de Organizaciones Empresariales.

<https://www.ceoe.es/es/publicaciones/union-europea/informe-de-seguimiento-de-los-fondos-next-generation-en-espana-sexto>

European Commission. (2021, June 16). *Analysis of the recovery and resilience plan of Spain* (Commission Staff Working Document SWD(2021) 147 final).

<https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:52021SC0147>

European Commission. (2022, July 22). *Report from the Commission to the European Parliament and the Council. Review report on the implementation of the Recovery and Resilience Facility*. https://commission.europa.eu/system/files/2022-07/com_2022_383_1_en.pdf

Gobierno de España. (2020). *Real Decreto-ley 36/2020, de 30 de diciembre, de medidas urgentes para la modernización de la Administración y de apoyo a la reactivación económica y social* [Real Decreto-ley]. *Boletín Oficial del Estado*, 338.

<https://www.boe.es/buscar/act.php?id=BOE-A-2020-17340>

Gobierno de España. (2021a). *Real Decreto 477/2021, de 29 de junio, por el que se aprueba la concesión directa a las comunidades autónomas y a las ciudades de Ceuta y Melilla de ayudas para la ejecución de diversos programas de incentivos ligados al autoconsumo y al almacenamiento de energía renovable, así como a la implantación de sistemas térmicos renovables en el sector residencial, en el marco del Plan de Recuperación, Transformación y Resiliencia* [Real Decreto]. *Boletín Oficial del Estado*.

https://www.boe.es/diario_boe/txt.php?id=BOE-A-2021-10824

Gobierno de España. (2021b). *Real Decreto-ley 29/2021, de 21 de diciembre, por el que se adoptan medidas urgentes en el ámbito energético para el fomento de la movilidad eléctrica, el autoconsumo y el despliegue de energías renovables* [Real Decreto-ley]. *Boletín Oficial del Estado*, 305.

<https://www.boe.es/buscar/act.php?id=BOE-A-2021-21096>

Gobierno de España. (2022). *Real Decreto-ley 14/2022, de 1 de agosto, de medidas de sostenibilidad económica en el ámbito del transporte, en materia de becas y ayudas al estudio, así como de medidas de ahorro, eficiencia energética y de reducción de la dependencia energética del gas natural* [Real Decreto-ley]. *Boletín Oficial del Estado*.

<https://www.boe.es/buscar/act.php?id=BOE-A->

[2022-12925](#)

Ministerio de Asuntos Económicos y Transformación Digital. (2023). *IV Informe de Ejecución del Plan de Recuperación* (20 diciembre 2023). Plan de Recuperación, Transformación y Resiliencia.

https://planderecuperacion.gob.es/sites/default/files/2023-12/21122023_IV_Informe_de_Ejecucion_del_Plan_de_Recuperacion_completo_0.pdf

Ministerio de Hacienda y Función Pública. (2021). *Orden TED/800/2021, de 23 de julio, por la que se establecen las bases reguladoras de determinadas ayudas en el marco del Plan de Recuperación, Transformación y Resiliencia* [Orden]. *Boletín Oficial del Estado*. <https://www.boe.es/eli/es/o/2021/07/23/ted800>

Parlament de Catalunya. (2017, August 1). *Ley 16/2017, de 1 de agosto, del cambio climático*. <https://www.boe.es/buscar/act.php?id=BOE-A-2017-11001>