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**GOVERNANCE OF THE NGEU IN SPAIN.
IS ENERGY POLICY TRANSITIONING TOWARDS A
TERRITORIAL RECENTRALIZATION?**

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Bachelor's Degree Dissertation

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Governance of the NGEU in Spain. Is energy policy transitioning towards a territorial recentralization?

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The energy transition was central to the design of the NGEU, which aimed to address Member States' structural challenges and propel them towards more sustainable and democratic economies. While much attention has focused on assessing the achievement of environmental targets by EU countries, the broader impact of this funds on national governance systems requires closer examination. In crucial areas such as energy transition, questions arise on how have Member States distributed authority of the resources and its execution. This paper examines, within the framework of the NGEU, the formal and practical governance structures of energy policy in Spain. The analysis reveals a trend towards the centralization of decision-making authority by the national government, leaving regional authorities with limited opportunities to effectively channel their demands through vertical governance mechanisms.

Key words: territorial governance · implementation studies · energy governance · Europeanization

Introduction

On December 14, 2020, the European Union adopted the Next Generation EU (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 (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 goal was for EU countries to emerge from the economic 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 program, and, within this realm, advancing an energy transition carried significant weight —a priority that gained even greater importance in 2022 following Russia's aggression against Ukraine, in response to which the REPowerEU program was introduced. 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.

Spain was allocated €72 billion from the NGEU funds, making it the second-largest recipient in absolute terms within the European Union. In drafting its National Recovery and Resilience Plan (European Commission, 2021) —a key document required to access the resources— 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 in this area, with Pillar III of the Plan entirely dedicated to them and accounting for €4.047 million of the invested funds so far (Gobierno de España, 2024a).

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 (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 (Gobierno de España, 2024a). 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, 2022, p.14). However, as the implementation process progressed, complaints have grown among regional governments, which argue 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” (ABC, 2022). 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.

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 (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. Accordingly, the investigation is guided by the following hypothesis: The implementation of energy transition policies in Spain, within the framework of the NGEU, demonstrates a recentralization of power at the territorial level. 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 methodological framework for the research and the subsequent analysis. Finally, the paper concludes with a set of findings.

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, nevertheless, is heavily reliant on external energy and a notable proportion of its energy consumption is closely tied to economic growth (Bellver et al., 2019, p.10). Key sectors, “including industry, tourism, transport, and agriculture, are considered potentially problematic for the environment” (Galera et al., 2023, p.263), while the number of households suffering from energy poverty remains relatively high. (Campos-Martín et al., 2022, p.1135). Consequently, achieving energy independence and sustainability is deemed essential in the country.

However, along with other Mediterranean nations, the Spaniards have traditionally been regarded as laggards 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 massive 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 (Santos et al., 2025, p.233). 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 et al., 2019); as well as planification factors, encompassing mistakes and failures that go from project selection, with 22% of funds unallocated as of 2019, to the accomplishment of objectives to prove in front of the European Commission (Hidalgo, 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 regard of 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 centralized 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 and connection of the environmental and energy domain gave certain flexibility and facilitated a process of decentralization 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 stances 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 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 recentralization. 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, p.119); Sectoral Conferences (Conferencias Sectoriales)¹, on the other side, 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 (Alda et al., 2009). 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, 2018, p.253). In this line, Catalonia’s Climate Change Law (BOE, 2017), 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 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, p.426).

¹ Spanish Sectoral conferences consist of “multilateral cooperation bodies for specific policy sectors that bring together the central government and the CCAA” (Galera et al., 2023, p.270).

In summary, the territorial structure of energy policy prior to the pandemic reflected a highly decentralized administrative state, where implementation powers were granted to CCAA for matters previously and unilaterally regulated by the central government (Puentes, 2019, p.476). However, regional authorities lacked sufficient autonomy to develop distinctive environmental policies of their own, as well as they 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 recentralization persist, or, in line with EU objectives, has there been a shift towards cooperative and non-hierarchical forms of governance? To address these questions, the methodological perspective of European implementation studies will be adopted.

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). 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, certain consensus has emerged around the notion that the extent of Europeanization results from a dual interaction: on the one hand, adaptational pressures stemming from EU mechanisms, and on the other, the influence of domestic variables such as organizational and political cultures embedded within existing national institutions (Wallace, 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). Consequently, non-compliance with European law has sparked extensive scholarly discussions about the conditions and variables that act either as drivers of or barriers to Europeanization (Toshkov et al., 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. 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 & 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.

Regarding methodology, European implementation studies tend to use concepts and variables from national political analysis. A basic notion in this sense 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 transposition, referring to the actual application of policies by the administrative actors and the achievement of intended outcomes (Thomann, 2017). Analysing both dimensions is crucial to understand the governance established over implementation processes.

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. The methodology used is that of European implementation studies, making a distinction between the formal or legally established structure of governance and the power struggle reflected in practical terms. Accordingly, it is firstly examined “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 analysed. 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 centralizing 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 side, those that have emerged as a consequence of or in response to the challenge of managing the massive resources.

Analysis

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 raised doubts from the European Commission over Spain's capacity to efficiently allocate the funds and demanded clarity on certain projects and reforms (Ibereconomía, 2021).

The governance framework established a structure “combining a vertical chain of command with horizontal ministerial responsibility” (Fernández & Lanaia, 2022, p.43). As it can be seen in *Figure 1*, a Commission for the NRRP, chaired by the Spanish President and integrated by the Ministers, was created to “direct and coordinate” the entire program and “make final decisions” on the approval of projects. 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” (BOE, 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 inferior 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 Ministry of Ecological Transition and Demographic Challenge (MITECO). Additionally, a new mechanism called PERTE² 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, for both the private sector and regional and local governments (Gobierno de España, 2024b).

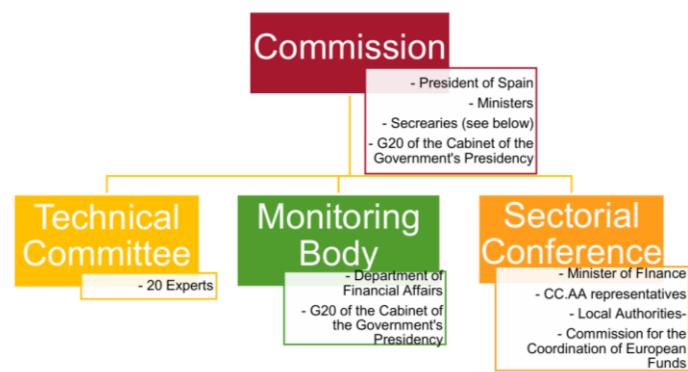


Figure 1 (Adapted from Bonisconi, 2021)

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 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

² Strategic Projects for Resilience and Economic Transformation

the least suitable venue for equal cooperation between the State and the Communities" (Alberton, 2020, p.15) As a result, prior to the pandemic the weight of achieved agreements over government regulations was increasingly lower (Alberton, 2020, p.13). 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, 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, 2024). 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 is a structure that does not benefit regional governments, as it requires them to allocate their administrative resources across multiple meetings and diminishes their ability to focus their position and negotiation power in one 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, the proposed model of governance “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” (Fernández & Lanaia, 2022, p.47). This is why, despite the criteria for distributing most of the funds has 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 (HAC, 2022), (ElDiario, 2022).

Overall, what can be observed at a formal level is a continuation of the trend towards re-centralization 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 address the shortcomings that persist in the existing tools.

Practical governance of Pilar III of the NRRP

Despite these concerns about the insufficient territorial representation in the formal governance of the NRRP, the Spanish program was approved and welcomed by the European Commission, and the governance model was generally deemed sufficiently inclusive. However, as the funds have been implemented, dissatisfaction among regional governments has grown, prompting the Commission to adjust its stance (ABC, 2022). To better understand these grievances, it is 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.

a) Sectoral Conference on the NRRP

As of December 2023, 161 sectoral conferences had been held to address issues related to the Recovery Plan (Gobierno de España, 2023, p.110). As previously stated, these meetings permitted the negotiation with CCAA in each policy lever, but hindered a broader discussion of the Plan's general orientation. On the other side, the NRRP Sectoral Conference, the mechanism specifically created to target these broader discussions, had convened only four times as of December 2024.

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 (TFP, 2021, p.41). 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.

Furthermore, after the initial Plan was agreed by European institutions, the Conference was convened for purposes other than facilitating regional participation in the governance of the program. The third meeting, held in the summer of 2021, pursued primarily to establish the Plan's management and monitoring system (TFP, 2021, p.41), 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 Fund³ (TFP, 2024, p.19), an instrument designed to "improve access to financing for Spain's CCAA" (NGEU-Assist, 2024), meaning that fund distribution, rather than achieving normative agreements, was the main objective.

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 not functioned 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 sense, the specifically created mechanism for managing the

³ Fondo de Resiliencia Autonómica (FRA)

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.

b) 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" (MITECO, 2021a). 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 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 (Pascual, 2022). This role—coordinating actions among the CCAA, deciding on funds allocation, and, generally, establishing top-down cooperation mechanisms—is legitimate and falls within the remit of sectoral conferences. However, as the territorialization of the funds has progressed, evidence suggests that even this task has not been carried out effectively. A report by the Spanish Confederation of Business Organizations highlights that, in bodies such as the sectoral conferences, "greater collaboration and information regarding the resources to be managed by CCAA is needed"

(CEOE, 2024, p.28). 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" (BOE, 2021a). 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 (BOE, 2021b) or technical issues related to the operational execution of funds by the CCAA, such as requests for deadline extensions in certain programs (BOE, 2021c). 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" (CEOE, 2024, p.28), 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 EHRA⁴ and VEC I and VEC II⁵ 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 programs

⁴ Renewable Energies, Renewable Hydrogen and Storage

⁵ Electric and Connected Vehicle

stands out positively (CEOE, 2024, p.35). 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.

c) Calls for the expression of interest (MDI)

Calls for the Expressions of interest (MDIs, by the Spanish acronym⁶) are an innovative mechanism in Spain, although commonly used by the European Commission, aimed at opening the initial stages of policymaking to interested private and public stakeholders. Unlike public consultations, MDIs represent a broad process designed to craft policies and public programs that address the specific needs of regions and the business community. Thus, their objective is to define the general framework of a policy and guide its subsequent actions.

In this context, the MITECO has issued twelve Expressions of Interest (MDIs) related to energy transition in the context of the NGEU. Of these, five saw significant participation from regional and local authorities, three were exclusively targeted at the private sector, and no information has been published regarding the level of regional participation in the remaining four (Gobierno de España, 2024b), (MITECO, 2021b). These instruments have allowed the Ministry to identify the most effective areas of focus for its efforts and to understand the needs of the regions and the industrial sector. Overall, the published results of the MDIs align

⁶ Manifestaciones de Interés

with the projects promoted by the central government, suggesting that they have been effective in shaping policy design and directing calls towards well-developed, mature projects.

In some MDIs, like the one for *Identifying projects related to electric mobility*, with 24% of the proposals coming from regional and local authorities (Gobierno de España, 2024b), territorial participation has been very high, making it an effective mechanism for lower levels of government to transmit their proposals vertically. However, it is important to note that the content of these expressions is strictly technical, not political; they occur in a space shared with the private sector and, typically, hundreds of proposals are submitted in total. Moreover, the Ministry's call completely determines the type of proposals that can be submitted, and there is no formal guarantee that the submission of a proposal will result in a reform or investment. In other words, while the mechanism has proven effective and it certainly permits an adaptation of the program to the needs of different territories, it is not an instrument that decentralizes the territorial governance of the RRF.

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

Figure 2: Produced by the author

Conclusions

The aim of this research has been assessing the extent to which Spain's energy policy, within the framework of the NGEU, reflects a process of recentralization in terms of territorial power. The findings indicate discernible trends in both the formal governance structure and the distribution of authority during the practical implementation of the policy, wherein the central government consolidates decision-making competencies while regional authorities are deprived of opportunities to effectively convey their demands through vertical channels. Notably, these centralization tendencies appear to be a continuation of certain dynamics that were already embedded in Spain's energy governance system prior to the pandemic. They also represent an exacerbation of existing trends, intensified by the substantial allocation of funds and the associated management measures, as well as the emergence of new patterns that were absent before the introduction of the NGEU. Thus, the research identifies not merely a continuity but also an intensification of the recentralization process concerning energy governance that characterised the decade preceding the NGEU.

These empirical findings also carry some theoretical implications. The investigation challenges traditional understandings of the democratizing effects that the EU has over policy-making patterns in the field of environmental policy among Member States. In contrast, it supports the perspective that the EU's ability to influence governance structures depends not only on its mechanisms and instruments for ensuring compliance, but also on the institutional configurations at the domestic level. Specifically, the findings suggest that, given the nature of the NGEU funds as a specific form of large-scale distributive program, its implementation can contribute to a centralization of the territorial structure of certain policies at the domestic level.

However, it is important to acknowledge that the data underpinning this analysis come from official documents and secondary sources related to the issue of territorial energy governance. In this sense, it would be helpful to complement it with research based on interviews with actors involved in the negotiations of Pilar III, to provide stronger evidence of the identified recentralization process.

Additionally, it is worth noting the specific scope of this analysis: energy policy. In this regard, the paper paves the way for future research on the relationship between European policies and national governance, with particular emphasis on identifying the potential drivers and barriers to governance transformations originating from European initiatives.

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