Analysis of socio-economic, institutional, and technical barriers to citizen-led projects

Report D2.1

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Abstract

This deliverable presents an analysis of the socio-economic, institutional, and technical barriers constraining citizen-led energy community projects in five European countries: Bulgaria, Cyprus, North Macedonia, Romania, and Ukraine. Produced under Work Package 2 of the SHAREs+ project (LIFE24-CET-101216127), the analysis draws on a structured stakeholder questionnaire (n=53), the National Citizens Energy Forums, and a targeted literature review.

The findings identify four barriers rated as high severity across all five countries: lack of grants and financial support schemes, difficulty identifying motivated local leaders, missing regulatory support and incentive schemes, and unclear administrative procedures. Institutional and financial barriers are consistently rated as more severe than technical barriers, confirming that regulatory and bureaucratic constraints remain the primary obstacle to energy community development in the region.

The five countries fall along a gradient of institutional readiness. Bulgaria and Cyprus have the most advanced legislative frameworks but face an operational gap between legal recognition and functioning support structures. Romania and North Macedonia have adopted or are developing primary legislation but lack secondary legislation and administrative pathways. Ukraine is at the earliest stage, where foundational barriers dominate, although significant legislative progress was made in 2026.

The analysis concludes with five priority recommendations: establishing clear legal and administrative pathways for EC formation, developing targeted early-stage financial instruments, creating one-stop-shop advisory services, investing in demonstration projects and peer learning, and clarifying energy-sharing implementation rules. These findings inform the subsequent project deliverables on tools and solutions (D2.2) and actionable policy guidance (D2.3).

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1 | Introduction

This deliverable presents an analysis of the socio-economic, institutional, and technical barriers that constrain citizen-led energy community projects in the five SHAREs+ partner countries: Bulgaria, Cyprus, North Macedonia, Romania, and Ukraine. It is the first substantive output of Work Package 2 and informs the subsequent deliverables D2.2, which will compile tools and solutions responding to Forum feedback, and D2.3, which will provide actionable policy guidance for each partner country.

The analysis draws on three complementary evidence streams: a structured stakeholder questionnaire conducted across all five countries (n=53); the National Citizens Energy Forums (NCEFs), which validated and contextualised the questionnaire findings through multi-stakeholder dialogue; and a targeted literature review. The methodological approach is described in Section 3.

Barriers are organised under three categories: socio-economic (financing access, awareness, trust, community leadership), institutional and administrative (legislative frameworks, permitting, coordination), and technical (grid infrastructure, metering, local capacity). This framework is applied consistently across the cross-country analysis and the five country chapters.

The report is structured as follows. Section 2 presents the literature review. Section 3 describes the methodology. Section 4 provides a cross-country barrier summary. Sections 5.1–5.5 contain the country-specific analyses, each following a common structure: country context, barrier table, narrative analysis, and priority enablers. Section 6 presents conclusions and recommendations.

2 | Literature review

Energy communities and citizen-led actions have become an important part of the European energy landscape, positioned at the centre of the EU's energy strategy and the foreseen transformation of its energy system. In recent years, awareness of community energy models has grown significantly, leading to their rapid development and expansion. This progress has been supported by the availability of practical tools and resources tailored to the needs of both emerging and established projects. This section reviews the key enablers and barriers influencing the development of energy communities, drawing on academic research, project reports, and policy analysis relevant to the SHAREs+ partner country contexts.

2.1 Regulatory and institutional frameworks

The regulatory environment consistently emerges in the literature as the most significant category of barriers to energy community development. Pigliautile et al., examining the implementation of energy communities and peer-to-peer energy trading through the H2020 NRG2peers project, identify a significant gap in the deployment of renewable energy communities across Europe due to a lack of social, technological, and regulatory innovation. The authors propose a four-dimensional framework to evaluate the readiness of energy communities:

- **Institutional:** national transposition of EU Directive 2018/2001 (RED II), legal definitions, geographical limitations, and data ownership regulations.
- **Market:** stakeholder roles, peer-to-peer regulation, and the investment structures needed to develop an energy community.
- **Technological and infrastructural:** physical assets, ICT systems for real-time balancing, and the challenge of system interoperability.
- **Social:** organisational factors (stakeholder coordination and available human resources) and user factors (acceptance, trust, and accessible technological solutions).

Mapping nine pilot sites across four European countries, the study categorises them by level of implementation: the Netherlands (innovators/early adopters), Spain (early majority), Slovenia (late majority), and Italy (laggard). In slow-adopter countries such as Italy, extreme uncertainty regarding subsidies and market regulation makes it difficult to provide a viable business model for private stakeholders, resulting in most communities being led by public authorities. Additionally, small Energy Service Companies are often considered unqualified to handle the technical complexities, and bureaucratic procedures for formal EC recognition are perceived as too laborious. A further structural barrier is the legal openness of energy communities: since members may join or leave freely at any time, it is very difficult to create reliable long-term business plans.

The distinction between the two EU-defined community models is examined by Yiasoumas et al. who review the regulatory frameworks for Renewable Energy Communities (RECs), introduced in the Renewable Energy Directive II (2018), and Citizen Energy Communities (CECs), defined in the Electricity Market Directive (2019). The key differences between these two models are summarised in

Table 1.

Table 1: Key differences between RECs and CECs

Renewable Energy Communities (RECs)	Citizen Energy Communities (CECs)
Only renewable technologies can be used.	No limits regarding the technologies that can be used.
Limitations in membership eligibility.	No restrictions in membership eligibility.
Small and medium enterprises (SMEs) can manage RECs.	Restriction to small and micro enterprises.
RECs can take part in all energy sectors.	CECs are limited to the electricity sector.

Source: Adapted from Yiasoumas et al., based on RED II and IEMD provisions.

Drawing on pilot initiatives from the NEON project in Italy, France, and Spain, Yiasoumas et al. observe that communities at different stages of development face different types of challenges, including user engagement and behaviour change, the need for effective business models, and environmental and CO_2 reduction objectives.

The fiscal dimension of regulatory barriers is quantified by Gjorgievski et al., who analyse how regulated charges, including network charges, value-added tax, and renewable or environmental levies, affect the financial viability of energy sharing across 39 European countries. Their findings are striking: regulated charges can reduce savings in collectively owned PV communities by 60–83%, while prosumer surplus-sharing delivers relatively low annual bill savings and remains highly vulnerable to future price and policy changes. The study underscores the difficulty of implementing the RED II requirement for cost-reflective charges while simultaneously encouraging community growth, and highlights the risk of designing network charges that provoke resistance from actors who lose revenue as local self-consumption grows. Regional variations are significant: tax-heavy systems such as Denmark benefit from exemptions on regulated charges, while ongoing regulatory uncertainty across Europe continues to delay implementation.

This pattern of regulatory primacy is confirmed through structured prioritisation by Dioba et al., who use an Analytical Hierarchy Process to rank barriers to energy community participation based on 20 stakeholder interviews and a survey of 56 participants from 16 EU countries. Regulatory and bureaucratic barriers emerge as the most significant category, with regulatory complexity ranked as the top individual barrier across nearly all stakeholder groups. Financial barriers follow as the second most significant category, with high initial costs and lack of funding as the primary concerns. Social and cultural barriers and technical barriers are ranked as less critical, suggesting that stakeholders are more deterred by systemic policy issues than by the technology itself. Regional variations are notable: in Spain, regulatory complexity is the primary challenge, whereas in Italy, legal limitations such as restrictions on virtual net metering are ranked as the principal obstacle.

2.2 Financial, social, and technical barriers

Beyond the regulatory environment, the literature identifies a consistent set of financial, social, and technical barriers that interact to constrain energy community development.

Boccard & Goetz examine the specific challenges facing energy communities with PV installations in urban apartment buildings. A central institutional challenge is the shared ownership of rooftop space, which requires formal approval from a homeowners' association — a process considerably more difficult than individual residential installations. This is compounded by limited rooftop area in densely populated

settings, often requiring coordination with neighbouring buildings. Beyond these setup challenges, communities face ongoing operational hurdles in selecting viable ownership models and designing transparent systems for tracking internal power flows that can accommodate the frequent entry and exit of members. The study also highlights social barriers around "fairness" of energy sharing: existing sharing rules often rely on overly complex models that lack the transparency necessary for broad stakeholder acceptance, potentially discouraging investment if members perceive free-riding by those who invest minimally but benefit disproportionately.

Lazdins et al., through the Local Energy Community project, apply a PESTLE analysis to PV energy communities across Germany, Finland, Sweden, and Ireland, identifying a range of challenges that extend beyond typical renewable energy barriers:

- **Social, cultural, and organisational:** lack of practical experience among citizens and local groups in setting up and managing community-led energy initiatives, combined with low trust in the community model, prevents potential members from committing to collective action.
- **Legal, administrative, and bureaucratic:** slow and complex grid connection procedures, difficulties in managing microgrids, and low institutional support for community-based renewable projects.
- **Technical:** critical lack of expert knowledge regarding the technical requirements and management structures of energy communities.
- **Financial:** limited access to funds, unfair compensation for energy production, weak incentives for renewable heating, and systemic inequalities in tax systems.
- **For established communities:** additional challenges emerge around determining and maintaining membership share value and securing investments for upgrading or maintaining existing installations.

A similar PESTLE approach applied in Poland by Neska et al. reveals a systematic gap caused by low public awareness and institutional barriers to REC implementation. Through expert interviews, the study identifies a matrix of opportunities, barriers, and key success factors across political, economic, social, technological, environmental, and legal dimensions. The findings emphasise that political instability and distrust of funding mechanisms, combined with low public trust, individualism, and weak perception of the state, create a particularly difficult environment for collective energy action in Central and Eastern European contexts.

2.3 Urban energy communities and grid impacts

The technical and systemic implications of scaling community energy in urban settings deserve particular attention. Boccard & Goetz highlight that large-scale PV installations can create temporal mismatches between peak generation and residential consumption, putting significant pressure on the distribution grid. These grid stability concerns may force Distribution System Operators to require expensive infrastructure upgrades or lead to regulatory limits that restrict the growth potential of urban energy communities.

Kerscher et al., through a quantitative assessment of planning scenarios in a real-world distribution grid in Northern Spain, identify how barriers shift in relevance depending on the project phase. During the motivation phase, social and psychological factors dominate, influenced by the absence of a strong tradition of energy cooperatives and concerns about fairness in cost and benefit distribution. During

development, legislative and administrative barriers become most significant, with lengthy permitting procedures creating substantial bureaucratic burdens. During implementation, technical and grid-related constraints emerge, including limited network capacity for distributed generation and insufficient ICT infrastructure, particularly in rural areas with weaker grid structures.

2.4 Implementation gaps and regional perspectives

Although the regulatory framework for energy communities is harmonised at the EU level, regional implementations differ considerably. Research consistently shows that countries such as Italy and France have managed to enable REC deployment through a combination of legal clarity, financial incentives, and active involvement of trusted intermediaries. In contrast, energy communities in Central and Eastern Europe remain underdeveloped and under-researched, particularly regarding public awareness, consumer motivation, and institutional capacity.

Ferreira documents a striking implementation gap in Portugal, where only eight out of 160 identified energy initiatives meet the criteria for a REC despite supportive EU policies. The gap between policy ambition and practical implementation is reinforced by lengthy, complex, and opaque licensing procedures, DSO inertia, and difficulties in accessing relevant information. The study observes that private companies typically promote collective self-consumption arrangements rather than RECs because of their simpler legal and governance requirements – a pattern that has led to a trend of "community-washing", where the term "renewable energy community" is applied to arrangements that lack direct citizen involvement in planning, financing, ownership, and management. These conditions indicate that energy communities could unintentionally mirror existing socio-economic inequalities unless specific actions are implemented to more fairly distribute access to knowledge, financial resources, and decision-making authority.

The Western Balkans face a distinct set of challenges. Stojilovska A. & Kolovrat M., analyse the implementation gap in North Macedonia and Serbia, both of which are committed to EU alignment via the Energy Community Treaty but face systemic barriers rooted in historical coal dependency, socialist legacies of subsidised energy prices, and current geopolitical instabilities. In North Macedonia, weak long-term RES policy, poor coordination with environmental and private-sector priorities, profit-driven market structures, and complex non-transparent procedures limit citizen participation, while the outdated privately operated grid lacks the capacity to absorb growing connection requests. In Serbia, dependence on imported PV panels, limited subsidies, shortages of skilled installers and administrative staff, legal uncertainty around energy communities, and slow approval procedures all raise costs and delay projects. Stojilovska A. & Kolovrat M. document similar legislative and administrative gaps in North Macedonia, including the absence of dedicated secondary legislation for energy communities, unclear administrative pathways, and limited institutional support for citizen-led initiatives.

For Bulgaria, the SHAREs D3.2b Handbook Angela Holzmann et al. identified a significant operational gap between the 2023 legislative amendments and the practical conditions for energy community formation. While recent developments such as the adoption of the Energy and Water Regulatory Commission energy-allocation methodology in February 2026 and the establishment of the first energy community in Gabrovo indicate progress, key constraints persist, particularly the absence of a dedicated EC registry, limited financial support mechanisms, and weak inter-institutional coordination.

The Energy Community Secretariat (2024) provides a broader regulatory gap analysis for the contracting parties to the Energy Community Treaty, including North Macedonia and Ukraine. The analysis identifies significant gaps in the transposition of RED II provisions for energy communities, including the absence

of dedicated legal definitions, unclear governance requirements, and limited provisions for energy sharing, findings that are directly confirmed by the SHAREs+ stakeholder questionnaire and NCEF discussions.

In Romania, a recent nationwide survey by Druta et al. confirms that public perceptions of energy communities are generally positive, but significant barriers persist in financing, institutional support, and regulatory complexity, consistent with the SHAREs+ stakeholder questionnaire findings for Romania. Romania's transposition of RED II through Emergency Ordinance No. 163/2022 remains partial, covering only PV-based electricity generation, and a draft amendment published in January 2025 aims to broaden the framework to include other renewable sources and community activities (Interreg Europe News (2025)). The legislative analysis conducted by the Municipality of Alba Iulia within the ShareRES project highlights that eight stakeholder organisations submitted proposals during the public consultation on the draft amendment, many of which were integrated, signalling growing civil society engagement with the EC regulatory process.

In Cyprus, Cyprus Energy Regulatory Authority (CERA) published the enabling framework for CECs and RECs in November 2024, building on Law 107(I)/2022 (RED II) and Law 130(I)/2021 (IEMD) (European Energy Communities Facility (2025)). However, Cyprus operates the EU's only fully isolated electricity grid, and renewable curtailment reached 29% in 2024, rising to an estimated 47% in 2025 (Tsagas I.), constraining the economic case for community energy models until storage and market provisions are developed (Clean energy for EU islands).

2.5 Emerging technologies as enablers

While the primary focus of this deliverable is barrier analysis, the literature also points to emerging technologies that could help address some of the technical constraints identified above.

Bahloul et al. assess citizen energy storage systems as a component of the energy transition, identifying policy barriers and low public awareness as the most critical constraints. Battery energy storage, while the most mature technology, remains unprofitable under current market conditions. Hydrogen and thermal storage show less maturity despite numerous pilot projects. The authors note that higher-consumption households show greater willingness to install residential storage, and recommend real-time communication and digitalisation systems, citizen-oriented forecasting tools, and AI-driven applications to improve coordination and flexibility. DSOs can support the transition by enabling community-based microgrids, publishing hosting-capacity maps, and promoting local energy markets.

Gjorgievski et al. demonstrate through optimisation modelling that adding storage to community energy systems generally improves self-consumption and self-sufficiency, and that energy sharing consistently outperforms non-sharing arrangements in terms of energy autonomy and peak demand reduction – provided that tariff structures include appropriate capacity-based charges. Velkovski et al. explore the potential of shared EV charging within residential renewable energy communities, showing that including external EVs during periods of high PV generation improves both self-consumption and self-sufficiency rates while increasing the community's economic benefits.

These technological developments are relevant to the SHAREs+ countries, where smart metering gaps and grid constraints are identified as significant barriers across the SHAREs+ partner countries. However, the deployment of such technologies remains contingent on the resolution of the regulatory and institutional barriers documented in the preceding sections.

eyond storage and flexibility technologies, dedicated IT platforms for energy sharing and real-time monitoring are increasingly recognised as a critical enabling layer for operational energy communities. Such platforms integrate smart meter data, consumption and generation profiles, and energy allocation algorithms to enable automated sharing among community members in line with agreed rules. By providing members with transparent, real-time information on energy flows, individual contributions, and collective performance, these platforms directly address two of the most persistent non-technical barriers identified in the SHAREs+ context: the lack of trust in cooperative models and the absence of accessible, citizen-oriented tools. Transparency in benefit distribution – showing each member what they produce, consume, and share – reduces the perception of unfairness that the literature identifies as a deterrent to participation (Boccard & Goetz). Several European pilot projects have demonstrated that community members who can actively monitor their energy data report higher satisfaction, stronger sense of ownership, and greater willingness to remain engaged over time. The development and deployment of such platforms is therefore not only a technical matter but also a social and institutional one, requiring coordination between DSOs, regulators, and community operators to ensure data access, interoperability, and compliance with applicable metering and settlement frameworks.

These technological developments are relevant to the SHAREs+ countries, where smart metering gaps and grid constraints are identified as significant barriers across the SHAREs+ partner countries. However, the deployment of such technologies remains contingent on the resolution of the regulatory and institutional barriers documented in the preceding sections.

2.6 Summary of key findings from the literature

The reviewed literature converges on several findings that directly inform the barrier analysis in this deliverable:

Regulatory and bureaucratic barriers are consistently identified as the most critical constraint, regardless of country context, community type, or analytical method. This finding holds across AHP prioritisation (Dioba et al.), PESTLE analysis (Lazdins et al.,Neska et al.) quantitative fiscal modelling (Gjorgievski et al.), and qualitative case studies (Ferreira; Stojilovska A. & Kolovrat M.). The specific manifestations vary – regulatory complexity in Spain, legal limitations in Italy, absent secondary legislation in North Macedonia, opaque licensing in Portugal – but the underlying pattern is consistent.

Financial barriers rank second, with the gap between policy ambition and available support instruments identified in nearly every case. The combination of high upfront costs, dependence on grants, and unfavourable fiscal treatment of shared energy creates a structural financing barrier that is particularly acute in Central and Eastern Europe, where Romania's partial transposition covering only PV-based electricity (Interreg Europe News (2025)) and Bulgaria's absence of dedicated co-financing mechanisms illustrate the pattern.

Social and trust barriers, while less frequently ranked as decisive, play a compounding role – particularly in countries with limited prior experience of collective energy models or with historical legacies that have eroded trust in cooperative structures. The literature suggests that these barriers are best addressed through demonstration projects and municipality-led initiatives, rather than through information campaigns alone.

Technical barriers are context-dependent: grid constraints and smart metering gaps are significant in countries with older infrastructure (Bulgaria, North Macedonia, Serbia), while island-system constraints such as renewable curtailment reaching 29% in Cyprus (Tsagas I.) and urban space constraints in Western European contexts present distinct challenges

A persistent implementation gap separates policy ambition from operational reality. Even in countries with transposed legislation, the path from legal recognition to a functioning energy community remains obstructed by administrative complexity, institutional fragmentation, and the absence of dedicated support structures, a finding that is directly confirmed by the SHAREs+ stakeholder questionnaire and NCEF processes.

3 | Methodological approach

3.1 Stakeholder questionnaire

The stakeholder questionnaire was designed under Task T2.1 and administered across the five partner countries between January and February 2026 via Google Forms. The questionnaire covered six thematic sections: stakeholder background (Section A), political and policy barriers (B), economic and financial barriers (C), social and cultural barriers (D), technical and technological barriers (E), and administrative and institutional barriers (F), plus enablers (G) and open comments (H). The full questionnaire is provided in Annex I. A total of 53 responses were collected, with the distribution shown in Table 2.

The questionnaire was not designed as a statistically representative public survey, but as a targeted stakeholder mapping exercise. Its purpose was to capture informed perceptions from actors directly or indirectly involved in the development, support or regulation of energy communities. The results should therefore be interpreted as a structured assessment of perceived barriers and enabling conditions, rather than as a measurement of general public opinion. This approach is consistent with the purpose of Task 2.1, which is to identify socio-economic, institutional and technical barriers to launching and scaling energy communities and to generate comparable data across partner countries.

To ensure comparability, all partners used the same questionnaire structure and response categories. The Google Form was the primary data collection method, while guided interviews or other assisted formats could be used where needed, provided that responses were entered into the same form. This helped maintain a common evidence base across countries while allowing partners to reach stakeholders with different levels of digital access or familiarity with the topic. The questionnaire results were first consolidated in the Catalogue of Barriers and are further analysed in this deliverable together with literature review findings and feedback from the National Citizen Energy Forums.

Table 2: Distribution of questionnaire responses by country

Country	Responses	Main stakeholder groups	Experience level
Bulgaria	14	EC pioneers (4), Local authorities (3), CSOs (2), Technical experts (2)	Mostly 1–7 years; 71% have ≥1 year experience
Cyprus	9	Local authorities (3), Academics (2), EC admin/consultants (2)	44% less than 1 year; emerging EC landscape
North Macedonia	15	CSOs (6), Academics (3), Technical experts (2), EC pioneers (2)	60% have 1–7 years; most diverse sample
Romania	8	Local authorities (4), CSOs (4)	75% have 1–3 years; 25% no experience
Ukraine	7	CSOs (3), Policy makers (2), Local authorities (2)	71% no experience; earliest stage of EC development
TOTAL	53	CSOs (15), Local authorities (13), Academics (6), EC pioneers (6), Technical experts (4), Policy makers (3), Other (6)	38% have 1–3 years; 23% no experience

Source: Responses to SHAREs+ stakeholder questionnaire, January–February 2026

The respondent sample was diverse in terms of stakeholder roles, with civil society organisations (CSOs, 28%) and local authority representatives (25%) being the largest groups. Experience levels varied significantly by country: Bulgaria and North Macedonia had the most experienced respondents, while

Ukraine's respondents lacked direct EC experience, reflecting the country's early-stage EC development and limited policy framework.

3.2 Analytical framework and barrier categories

The analytical framework follows the structure of the stakeholder questionnaire and groups barriers into three main categories: socio-economic barriers, institutional and administrative barriers, and technical and technological barriers. This grouping reflects the objective of Task 2.1 to identify the main socio-economic, institutional and technical obstacles to launching and scaling energy communities across the SHAREs+ partner countries.

Socio-economic barriers include factors affecting the willingness and ability of citizens, local actors and communities to initiate or join energy communities. These include access to finance, availability of grants and support schemes, upfront investment costs, public awareness, trust in cooperative or collective models, experience with collective action, and the availability of motivated local leaders.

Institutional and administrative barriers cover the legal, regulatory and procedural conditions that determine whether an energy community can move from concept to implementation. These include the clarity of national legislation, existence of support schemes, complexity of authorisation procedures, coordination between institutions, availability of one-stop-shop services, and clarity of registration and operational rules.

Technical and technological barriers include constraints related to grid connection, metering, data availability, DSO procedures, local technical expertise, IT systems, and the practical implementation of energy sharing, self-consumption or other collective energy models.

For the cross-country comparison, barriers were assessed using a qualitative severity scale: H = high severity, M = medium severity, and – = not identified as significant or insufficient evidence. As a general rule, a barrier was rated as H (high severity) where it was selected or negatively rated by at least half of the national respondents, and as M (medium severity) where it was selected by roughly one quarter to one half. A rating of – indicates that the barrier was not identified as significant or that the evidence was insufficient. The ratings should therefore be interpreted as a structured comparative assessment, not as statistically precise measurements.

The analysis also recognises that barriers are interconnected. Financial barriers are often reinforced by legal uncertainty and unclear support schemes; low public awareness and weak trust reduce the pool of potential members and local leaders; and technical barriers, such as grid connection complexity or insufficient smart metering, can limit the practical feasibility of otherwise promising models. For this reason, the country chapters analyse not only individual barriers, but also the way they interact in each national context.

The same logic is applied to the identification of enablers. Enablers are understood as practical, regulatory, financial, technical or capacity-building measures that can reduce the severity of the identified barriers. These include clear and operational legal frameworks, simplified administrative procedures, one-stop-shop services, targeted financial instruments, technical assistance, awareness-raising, capacity-building programmes, and improved metering and data systems. The proposed enablers are further refined through the NCEF process and used as a basis for country-specific recommendations.

4 | Cross-Country Summary of Barriers

For the cross-country comparison, barriers were assessed using a qualitative severity scale: H = high severity, M = medium severity, and – = not identified as significant or insufficient evidence. The rating methodology is described in Section 3. This section synthesizes the stakeholder questionnaire results across the five SHAREs+ partner countries, based on 53 responses collected in January–February 2026. Barriers were assessed using a qualitative severity scale: H = high severity, M = medium severity, and – = not identified as significant or insufficient evidence. For a full description of the methodology and rating approach, see Section 3.

Table 3: Barrier across SHAREs+ partner countries

Barrier	Bulgaria	Cyprus	N. Macedonia	Romania	Ukraine
A. Socio-Economic Barriers					
Lack of grants and financial support schemes	H	H	H	H	H
High upfront investment costs	H	H	M	M	H
Uncertain return on investment / weak business case	M	M	M	H	H
Low electricity prices (structural disincentive)	M	–	M	–	M
Low public awareness about energy communities	M	H	H	H	H
Lack of trust in cooperative/collective models	H	M	H	H	H
Difficulty identifying motivated local leaders	H	H	H	H	H
B. Institutional & Administrative Barriers					
Weak or incomplete EC legislative framework	H	M	H	H	H
Missing regulatory support and incentive schemes	H	H	H	H	H
Complex bureaucratic and authorisation procedures	H	M	H	H	M
One-stop-shop services absent or inadequate	M	H	H	M	H
Unclear administrative procedures	H	H	H	H	H
Lack of inter-authority coordination	H	M	H	M	H
C. Technical & Technological Barriers					
Complex grid connection procedures	H	M	H	M	H
High grid connection costs	M	–	–	M	H
Insufficient smart metering infrastructure	H	M	M	M	M
Inadequate DSO IT systems / data availability	M	–	–	M	–
Limited local technical expertise	M	M	H	M	H

Source: Summary derived from responses to SHAREs+ stakeholder questionnaire, January–February 2026

The cross-country comparison reveals both recurring patterns and significant national divergences. Four barriers are rated as high severity across all five countries: lack of grants and financial support schemes, difficulty identifying motivated local leaders, missing regulatory support and incentive schemes, and

unclear administrative procedures. These represent the structural core of the challenge facing citizen-led energy communities in the SHAREs+ region: regardless of the legislative context, these barriers constrain entry into the sector and limit the practical feasibility of community-based energy models.

Socio-economic barriers

Financing emerges as the most uniformly severe socio-economic barrier. All five countries rate lack of grants and financial support schemes as high severity, reflecting the absence of dedicated national financing instruments for energy community formation. High upfront investment costs are rated as high in Bulgaria, Cyprus, and Ukraine, and as medium in North Macedonia and Romania, where the concern is less about absolute cost and more about uncertain return on investment and weak business case viability. Romania stands out with 88% of respondents rating financing access as difficult or very difficult, the highest rate in the sample.

Public awareness follows a clear gradient. Bulgaria is the only country where awareness is rated as medium rather than high severity, reflecting the visibility generated by the predecessor SHAREs project and the national legislative debate. In the remaining four countries, awareness is rated as high, with Ukraine representing the most severe case (100% of respondents rated awareness as low or very low). Low awareness interacts directly with trust: lack of trust in cooperative or collective models is rated as high in four countries and medium in Cyprus, suggesting that the barrier is not simply informational but also cultural and institutional. In Bulgaria, this is linked to the historical legacy of forced cooperative organisation. In Romania, all respondents selected lack of trust as a barrier, making social legitimacy a central concern. In Cyprus, the absence of any operational energy community means that the concept lacks a domestic track record, reinforcing scepticism.

Finding motivated local leaders is rated as high across all countries. This reflects a common constraint: even where legal and financial conditions improve, energy communities require individuals willing to invest time and credibility in mobilising their community. In Bulgaria, 93% of respondents rated this as complex, the highest rate in the sample. The difficulty is compounded in countries where local authority support is weak or inconsistent.

Institutional and administrative barriers

The institutional picture is more differentiated. Missing regulatory support and incentive schemes are rated as high in all five countries, confirming that no SHAREs+ partner country has yet established a functioning support framework for energy communities. Legislative clarity varies substantially: Bulgaria, North Macedonia, Romania, and Ukraine rate their legislative frameworks as weak or incomplete (high severity), while Cyprus rates it as medium, reflecting its comparatively advanced transposition of both RED II and IEMD provisions. However, even in Cyprus, the gap between legislation on paper and practical implementation is the dominant concern.

Administrative complexity is a consistently high-severity barrier, but its manifestation differs by country. In Bulgaria, the primary issue is lack of inter-authority coordination (cited by 71% of respondents, the highest in the sample), reflecting a multi-institutional landscape spanning the Ministry of Energy, the Energy and Water Regulatory Commission (EWRC), the Sustainable Energy Development Agency (SEDA), and the distribution system operators. In Cyprus, the primary issue is multiple approval requirements (cited by 78% of respondents), the highest rate for any single administrative barrier across the entire sample. In North Macedonia and Ukraine, the barriers are more foundational: unclear procedures and the absence of one-stop-shop services leave potential EC founders without a clear institutional entry point.

One-stop-shop availability also varies: Bulgaria and Romania report some emerging services (medium severity), while Cyprus, North Macedonia, and Ukraine report near-total absence (high severity). This is a practical indicator of institutional readiness: countries with at least some advisory infrastructures are better positioned to support new initiatives than those where citizen groups must navigate the system without guidance.

Technical and technological barriers

Technical barriers are the most differentiated across countries. Bulgaria reports the most consistently severe technical constraints: 100% of respondents rated grid connection as complex or very complex, and lack of smart metering (64%) is a structural impediment to implementing the EWRC energy-allocation methodology. Ukraine follows closely, with 86% rating grid connection as complex and 86% citing lack of local technical expertise, the highest rates in the sample for both barriers.

North Macedonia presents a broad technical barrier profile, with grid connection complexity (67%) and lack of local expertise (60%) both rated as high. Cyprus and Romania present a different pattern: technical barriers are rated as medium rather than high, but this should be interpreted cautiously. In Cyprus, 44% of respondents lacked technical experience and selected "don't know" on grid connection questions, suggesting that the technical assessment may understate the actual challenge. In Romania, the presence of an active cooperative ecosystem and practical experience with pilot projects provides a degree of technical capacity that other countries lack.

Smart metering is rated as high in Bulgaria only, and as medium in all other countries. However, smart metering is a prerequisite for implementing energy sharing and community-level self-consumption models in all five countries, and its importance is likely to increase as legislative frameworks mature and energy sharing provisions are operationalised.

High grid connection costs and inadequate DSO IT systems are not identified as significant barriers in most countries, with the notable exception of Ukraine, where high grid connection costs are rated as high.

Cross-cutting observations

Three cross-cutting patterns emerge from the comparison. First, institutional and financial barriers are consistently rated as more severe than technical barriers, confirming the finding from the literature review that regulatory and bureaucratic constraints are the primary obstacle to energy community development. Second, the five countries fall along a gradient of institutional readiness. Bulgaria and Cyprus have the most advanced legislative frameworks, with both EU directives transposed and initial operational steps taken but face a persistent gap between legislation on paper and functioning support structures. Romania and North Macedonia have adopted or are developing primary legislation, but lack the secondary legislation, administrative pathways, and practical experience needed for implementation at scale. Ukraine is at the earliest stage, where foundational barriers including absent legislation, minimal stakeholder experience, and low awareness dominate, although significant legislative progress was achieved in the first half of 2026. Third, barriers are interconnected: financial constraints reduce the pool of potential projects, which limits practical experience, which in turn reinforces low awareness and weak trust, creating a cycle that can only be broken through coordinated action across multiple barrier categories simultaneously.

5 | Country insights

5.1 Bulgaria

5.1.1 Country context

Bulgaria combines a relatively active stakeholder ecosystem with an enabling framework that is still not fully operational in practice. Within SHAREs+, Bulgaria has a dual role: it is both a pioneer country for developing the energy community framework and a pilot site for citizen-led renewable thermal solutions, with a focus on vulnerable consumers. The Energy from Renewable Sources Act (EVEI) was amended in 2021–2023 to introduce provisions for renewable energy communities and citizen energy communities, providing the primary legal basis for their development. However, implementing secondary legislation remains incomplete as of early 2026. The first Bulgarian NCEF, held at the Ministry of Energy in April 2026, confirmed that recent regulatory progress is important but not sufficient to make energy communities replicable without clearer rules, streamlined procedures and targeted support.

5.1.2 Key barriers identified

Bulgaria shows a high-severity profile across financial, institutional and technical barriers. The main implementation challenge is not only the existence of legal provisions, but their practical application through clear registration, energy-sharing, metering and DSO coordination arrangements

Table 4: Identified barriers to citizen-led energy communities in Bulgaria

Barrier	Rating*	Description & country context
A. Socio-Economic Barriers		
Limited access to finance and lack of targeted grants	H	79% of respondents assessed access to finance as difficult or very difficult; high upfront costs and lack of grants were the most frequently selected financial barriers.
Trust and collective ownership culture	H	Lack of trust, limited collective-action experience and preference for individual ownership remain significant; awareness is less acute than in other countries but still needs continued support.
Dependence on project-based initiatives	M	Without stable national instruments, ECs risk remaining dependent on EU-funded or donor-funded pilots rather than becoming a replicable market segment.
B. Institutional & Administrative Barriers		
Unclear and fragmented legal-regulatory framework	H	64% rated legislation as unclear; NCEF participants stressed inconsistencies between relevant legal acts and the need for a clear registration route.
Complex procedures and weak coordination	H	Complex bureaucracy, lengthy authorisations and weak inter-authority coordination were among the leading barriers; 71% cited lack of coordination.
No dedicated registry/support structure	H	The NCEF identified the absence of a streamlined registration process and national registry as a practical bottleneck.
C. Technical Barriers		

Grid connection complexity and DSO interaction	**H**	100% of respondents rated grid connection as complex or very complex; NCEF participants also highlighted costs, timelines, data access and metering/billing issues.
Smart metering and settlement arrangements	**H**	Smart meters, consumption profiling, balancing and settlement rules need clarification for household participation and energy sharing.
Limited local technical capacity	**M**	Technical assistance is needed to turn early-stage initiatives into investment-ready projects and reduce reliance on external experts.

**H = High severity; M = Medium*

Source: Ratings based on SHAREs+ stakeholder questionnaire responses and Catalogue of Barriers; complemented where relevant by available NCEF inputs

5.1.3 Analysis

The Bulgarian barrier profile is dominated by the interaction between finance, regulatory clarity and grid implementation. The questionnaire shows a relatively informed respondent group and a less severe awareness gap than in other partner countries. However, practical implementation remains difficult: respondents highlighted financing constraints, complex bureaucracy, lack of coordination, and grid connection complexity as decisive barriers.

Socio-economic barriers are linked mainly to the lack of targeted financial instruments and the high transaction costs borne by early initiatives. Although public awareness is not as low as in Cyprus, Romania or Ukraine, trust in cooperative models and collective ownership remains a constraint. The NCEF discussion also underlined that vulnerable consumers require specific support if community-based models are to contribute to energy poverty alleviation rather than remain limited to more capable actors.

Institutional and administrative barriers are the most urgent area for policy action. NCEF participants pointed to the need for a clear registration process, a dedicated registry, clarification of legal forms, and better coherence between the Energy Act and Renewable Energy Act. Technical barriers reinforce these institutional problems: energy sharing requires practical rules for metering, billing, balancing, household participation and coordination with DSOs. Without resolving these issues, ECs are likely to remain dependent on isolated EU-funded or donor-funded pilots rather than becoming a repeatable national model.

5.1.4 Priority enablers and recommendations

- **Clear registration process and national registry** – Define a simple registration procedure under a designated authority and create a transparent registry of ECs. This would reduce legal uncertainty and help institutions, DSOs and support programmes identify eligible projects.
- **Targeted early-stage finance** – Introduce grants or development vouchers for feasibility studies, legal structuring, technical design and community mobilisation. This would address the gap before projects become bankable.
- **Energy-sharing implementation package** – Clarify metering, billing, settlement, balancing and household participation rules. This could be tested through pilot projects and, where appropriate, regulatory sandboxes.

- **One-stop-shop and technical assistance** – Provide a single information and advisory point for municipalities, citizens and EC pioneers, linked to the SHAREs+ Gateway and national institutions.
- **Trust and capacity building for local actors** – Use municipalities, NGOs and existing ECs to communicate benefits, build trust, and support replication in buildings, heating and vulnerable-consumer contexts.

5.2 Cyprus

5.2.1 Country context

Cyprus has one of the more advanced legal bases for energy communities among the SHAREs+ partner countries, having transposed provisions related to renewable energy communities under Article 22 of the Renewable Energy Directive (RED II), Directive (EU) 2018/2001, and citizen energy communities under Article 16 of the Internal Electricity Market Directive (IEMD), Directive (EU) 2019/944, into national law. This provides an important regulatory foundation for citizen-led and collective energy initiatives. However, no energy community has become fully operational in Cyprus to date, and stakeholder perceptions of barriers are therefore based largely on anticipated rather than experienced constraints. The questionnaire results indicate that the main barriers in Cyprus are not only regulatory, but also economic, social and procedural. The key challenge is therefore to translate the existing legal framework into accessible, practical support for citizens, local authorities and emerging initiatives.

5.2.2 Key barriers identified

Cyprus shows a comparatively more advanced formal framework, but the questionnaire points to persistent practical barriers: limited finance, low awareness, multiple approvals and insufficient technical support for project implementation.

Table 5: Identified barriers to citizen-led energy communities in Cyprus

Barrier	Rating*	Description & country context
A. Socio-Economic Barriers		
High upfront costs and limited collective financing	H	67% assessed access to finance as difficult or very difficult; lack of grants and high upfront costs were the leading financial barriers.
Low awareness and limited experience with collective action	H	89% rated public awareness as low or very low; lack of information and limited collective-action experience were the leading social barriers.
Local leadership pipeline	M	Finding local heroes was assessed as complex by 56% of respondents, suggesting a need for facilitation and structured outreach.
B. Institutional & Administrative Barriers		
Support schemes and practical implementation gaps	H	Although the legislative basis is more developed than in several partner countries, missing support schemes remain a major barrier.

Multiple approval requirements	**H**	Multiple approval requirements were selected by 78% of respondents, indicating that procedural simplification remains essential.
One-stop-shop support gap	**H**	Dedicated assistance is still insufficient for non-expert citizen groups, especially at the project preparation stage.
C. Technical Barriers		
Smart metering and data systems	**M**	Lack of smart meters was the most frequently selected technical barrier; technical uncertainty is also reflected in the high share of respondents unable to assess grid procedures.
Grid connection complexity	**M**	Only one third rated grid connection as complex, but four respondents reported no technical experience, suggesting that the issue may be under-assessed rather than absent.
Community-level technical expertise	**M**	Technical support is needed to translate legal possibilities into viable project concepts, especially for municipalities and citizen groups.

**H = High severity; M = Medium;*

Source: Ratings based on SHAREs+ stakeholder questionnaire responses and Catalogue of Barriers; complemented where relevant by available NCEF inputs.

5.2.3 Analysis

The Cyprus barrier profile is characterised by a gap between formal regulatory progress and practical uptake. Respondents did not identify legislative absence as the dominant issue to the same extent as in North Macedonia or Ukraine, but they did identify missing support schemes, complex procedures, low awareness and lack of collective-action experience as major constraints.

Socio-economic barriers are particularly important. Access to finance was assessed as difficult by two thirds of respondents, and all respondents selected financial instruments as one of the most valuable support needs, a finding reinforced at the first NCEF session where the lack of governmental financial support was identified as one of the main barriers to starting an energy community in Cyprus. Public awareness is also very low: almost nine in ten respondents rated it as low or very low. This suggests that the next stage of support should not only explain what energy communities are, but also demonstrate concrete benefits, business models and participation routes for citizens, municipalities and SMEs.

Administrative and technical barriers are partly linked to implementation capacity. Multiple approval requirements and the absence of strong one-stop-shop services make project development difficult for non-expert groups. Technical barriers appear less strongly assessed than in Bulgaria or Ukraine, but this should be interpreted cautiously because several respondents did not have technical experience. Smart metering, data access and technical assistance are therefore important enabling conditions for future collective self-consumption and energy-sharing models. The NCEF, in addition to validating the findings, highlighted the lack of defined procedures in the technical part like the energy sharing and the guidelines for implementation. The lack of clearly defined procedures and coordination between the DSO and interested parties creates an uncertain environment, discouraging people from becoming involved in energy communities. Forum participants also raised concerns about the dominant role of the national DSO in energy sharing arrangements, noting that the current level of control over the process is perceived as monopolistic and may discourage new entrants. This reinforces the broader finding that Cyprus's challenge is less about legal recognition and more about creating the operational and market conditions under which energy communities can function in practice. The first NCEF session validated

the questionnaire findings and confirmed that financial support, procedural clarity and DSO engagement remain the priority areas for intervention.

5.2.4 Priority enablers and recommendations

- **Practical implementation guidance** – Prepare simple step-by-step guidance for establishing and operating ECs, including legal form, permits, financing, technical design and member governance.
- **Financial incentives and collective finance tools** – Develop grants, guarantees or blended-finance schemes for citizen-led PV and other community projects, with attention to early-stage development costs.
- **Awareness campaigns with concrete use cases** – Move beyond general awareness-raising and present practical models for households, municipalities and SMEs, including costs, benefits and risks.
- **One-stop-shop services** – Create or strengthen an advisory service connected to national institutions and the SHAREs+ Gateway to reduce procedural uncertainty.
- **Smart metering and data readiness** – Accelerate smart-metering and data-access arrangements needed for energy sharing and transparent allocation of benefits.

5.3 North Macedonia

5.3.1 Country context

North Macedonia is at an early but dynamic stage of citizen-led energy development. As a Contracting Party to the Energy Community Treaty, the country is required to align its legislation with the Energy Community acquis, including provisions related to renewable energy communities and active consumers. The new Energy Law, adopted in May 2025, introduced important elements of the EU Clean Energy Package and recognises energy communities, while a separate Law on the Use of Energy from Renewable Sources is being developed to further regulate renewable energy, including energy communities. However, the framework remains difficult to implement in practice because secondary legislation, detailed procedures and support mechanisms are still incomplete. Stakeholder feedback under SHAREs+ indicates that legal clarity, support schemes, financing, public awareness, grid connection and administrative procedures remain high-priority barriers. These findings were discussed during the first National Citizen Energy Forum in North Macedonia, held online in April 2026, where participants validated the initial barrier mapping, highlighted secondary legislation and one-stop-shop support as priority issues, and prioritised secondary legislation as the next topic for further discussion.

5.3.2 Key barriers identified

North Macedonia shows one of the broadest barrier profiles in the sample. Legal uncertainty, missing support schemes, finance, low awareness, grid connection and local technical capacity all appear as high-priority constraints.

Table 6: Identified barriers to citizen-led energy communities in North Macedonia

Barrier	Rating*	Description & country context
A. Socio-Economic Barriers		
Lack of grants and difficult access to finance	H	67% assessed access to finance as difficult or very difficult; lack of grants and uncertain return on investment were the most selected financial barriers.
Low awareness and limited understanding of benefits	H	60% rated awareness as low or very low; lack of information about benefits was selected by 80% of respondents.
Preference for individual ownership and low trust	H	Cultural preference for individual ownership and lack of trust in cooperative models were widely selected, limiting the social basis for collective investment.
B. Institutional & Administrative Barriers		
Incomplete or unclear legal framework	H	80% rated legislation as unclear, very unclear or absent; the NCEF meeting emphasised that legal clarity is a high-priority barrier.
Missing support schemes and regulatory incentives	H	Missing support schemes were one of the main regulatory barriers; dedicated incentives for ECs are not yet operational.
Unclear procedures and fragmented administration	H	Unclear procedures, multiple approvals and lack of coordination were the leading administrative barriers; no comprehensive one-stop-shop exists.
C. Technical Barriers		
Complex grid connection	H	67% assessed grid connection as complex or very complex; the NCEF discussion highlighted grid connection as a high-severity barrier.
Limited local technical expertise	H	Lack of local expertise was selected by 60% of respondents, making technical assistance a priority for early initiatives.
Smart metering and DSO systems	M	Smart metering and DSO IT systems were identified as secondary but important enabling conditions for energy sharing.

**H = High severity; M = Medium;*

Source: Ratings based on SHAREs+ stakeholder questionnaire responses and Catalogue of Barriers; complemented where relevant by available NCEF inputs

5.3.3 Analysis

The North Macedonian barrier profile is broad and mutually reinforcing. The questionnaire shows high severity across almost all categories: 80% of respondents rated the legislation as unclear, very unclear or absent; 67% assessed access to finance as difficult or very difficult; 60% rated public awareness as low or very low; and 67% assessed grid connection procedures as complex or very complex. This indicates that citizen-led projects face both entry barriers and implementation barriers.

Socio-economic barriers are driven by financing, limited awareness and weak familiarity with cooperative models. Lack of available grants and uncertain return on investment reduce the ability of citizen groups, municipalities and NGOs to develop bankable projects. At the same time, lack of information about benefits and preference for individual ownership limit community mobilisation. The

NCEF framing correctly positions the questionnaire results as a basis for discussion rather than final conclusions, because practical experience from pilot initiatives will be essential for refining the analysis.

Institutional and administrative barriers are especially important because the legal framework does not yet provide a simple and predictable route from initiative to operational EC. Respondents identified missing support schemes, conflicting regulations, complex bureaucracy, unclear procedures, multiple approvals and lack of institutional coordination. Technical barriers then create a second implementation layer: grid connection procedures, local technical expertise, smart meters and DSO systems all affect whether an EC can move from concept to operation.

5.3.4 Priority enablers and recommendations

- **Complete and operational EC legal framework** – Clarify legal definitions, eligible members, governance, energy-sharing rights, registration and interaction with existing prosumer rules.
- **Targeted financial support for citizen-led projects** – Introduce grants, development finance or guarantee mechanisms for feasibility studies, technical design, legal support and small-scale RES investment.
- **One-stop-shop and municipal energy offices** – Provide a single support point for citizens, municipalities and initiatives, with standard documents, templates and procedural guidance.
- **Technical assistance and local expert pool** – Develop a pool of trained technical/legal/financial experts able to support pilots and future initiatives, linked to SHAREs+ tools and mentoring.
- **Awareness and trust-building campaign** – Use pilot examples, NCEF discussions and local NGOs to communicate benefits, address misconceptions and build trust in collective ownership models.

5.4 Romania

5.4.1 Country context

Romania is at an emerging but increasingly active stage of energy community development. The country has taken important steps in transposing provisions related to Renewable Energy Communities, including through Law 163/2022 but also for Citizen Energy Community through Law123/2012 and subsequent regulatory developments, while the Romanian Energy Regulatory Authority **(**ANRE) plays a central role in shaping the secondary rules and practical implementation models. However, the operationalisation of energy communities remains uneven, particularly regarding collective self-consumption, energy sharing, grid-connection procedures and the practical application of secondary legislation. At the same time, Romania benefits from growing practical experience with cooperative and community-based models, as well as an emerging support ecosystem of civil society organisations, local authorities and expert actors. Questionnaire responses indicate that legal clarity, access to finance, trust in collective models and procedural implementation remain significant barriers. The key challenge for Romania is therefore to translate formal legal recognition and emerging practical experience into a clearer, simpler and more supportive framework for citizen-led projects.

5.4.2 Key barriers identified

Romania benefits from an active cooperative and coalition ecosystem, but wider replication is constrained by finance, unclear procedures, lack of trust in cooperative models and incomplete operationalisation of the legal framework.

Table 7: Identified barriers to citizen-led energy communities in Romania

Barrier	Rating*	Description & country context
A. Socio-Economic Barriers		
Access to finance and lack of grants	H	88% assessed access to finance as difficult or very difficult; lack of grants was selected by 88% of respondents.
Trust in cooperative models	H	All Romanian respondents selected lack of trust in cooperative models, making social legitimacy a central barrier.
Awareness and benefit communication	H	62% rated awareness as low or very low; lack of information about benefits was selected by 75% of respondents.
B. Institutional & Administrative Barriers		
Unclear legislative and support framework	H	88% rated legislation as unclear or absent; missing support schemes were the most selected legal/regulatory barrier.
Unclear procedures and inter-authority coordination	H	Unclear procedures were selected by 63% of respondents; coordination problems and multiple requirements continue to affect implementation.
Emerging support ecosystem not yet sufficient	M	The existence of Cooperativa de Energie and the Community Energy Coalition is an important enabling factor, but public support structures remain limited.
C. Technical Barriers		
Grid connection and technical costs	M	Technical barriers are less severe than regulatory and financial barriers but include grid procedures, local expertise, connection costs and smart meters.
Community-level project preparation capacity	M	Technical and financial project preparation capacity remains necessary for municipalities, associations and citizen groups.
IT/smart-metering readiness	M	DSO IT systems and smart metering need further attention to support energy sharing and collective self-consumption.

**H = High severity; M = Medium;*

Source: Ratings based on SHAREs+ stakeholder questionnaire responses and Catalogue of Barriers; complemented where relevant by available NCEF inputs

5.4.3 Analysis

Romania's barrier profile differs from countries where no support ecosystem exists: the country has strong civil-society and cooperative actors, but the enabling framework is still not sufficiently clear or accessible for wider replication. Respondents reported high difficulty in accessing finance and high uncertainty regarding legislation and support schemes. This suggests that the presence of pioneers is an important asset, but it does not substitute for predictable national procedures and dedicated support instruments.

Socio-economic barriers are particularly linked to trust and information. All Romanian respondents selected lack of trust in cooperative models, while three quarters selected lack of information about

benefits. This is relevant because energy communities rely on voluntary participation, democratic governance and long-term member commitment. The existing cooperative and coalition can therefore act as trusted intermediaries, translating experience into practical guidance and helping new groups understand governance, finance and risk-sharing.

Institutional barriers remain a central bottleneck. Respondents highlighted missing support schemes, unclear legislation and unclear administrative procedures. Available national input highlights legal forms and the distinction between citizen energy communities and renewable energy communities, as well as the role of ANRE models. This confirms that the next priority is not only legal transposition, but practical operationalisation: registration, model statutes, licensing thresholds, energy sharing, and support for municipalities and associations. Technical barriers are medium rather than dominant, but project preparation, grid procedures and smart-metering/IT readiness remain necessary conditions for scale-up.

5.4.4 Priority enablers and recommendations

- **Operational secondary legislation and model documents** – Clarify registration, legal forms, licensing thresholds, energy-sharing models and minimum requirements for communities.
- **Use Cooperativa de Energie and the Coalition as intermediaries** – Recognise and support existing trusted organisations to provide technical assistance, templates and peer learning.
- **Dedicated finance for community projects** – Create grants, revolving fund or guarantee mechanisms that reduce perceived risk and support early-stage project development.
- **Public awareness through real cooperative examples** – Use existing Romanian examples to explain benefits, governance and member participation in practical terms.
- **Municipality-focused support pathway** – Develop a specific support route for municipalities, schools, public buildings and local associations interested in community energy projects.

5.5 Ukraine

5.5.1 Country context

Ukraine represents the earliest-stage context for energy community development among the SHAREs+ partner countries. The country enters this process shaped by three defining conditions that distinguish it from the other partners: an ongoing wartime context that both disrupts implementation capacity and intensifies urgent energy security needs; a decade of decentralisation reform that has strengthened the role and capacity of municipalities to lead local initiatives; and an accelerating legislative trajectory that, as of May 2026, has materially changed the institutional landscape compared to the baseline captured through the stakeholder questionnaire. At the same time, Ukraine's active civil society, decentralisation experience and urgent need for resilient local energy solutions create a strong rationale for community-based renewable energy models, particularly where they can support public services and strengthen local resilience.

As of early 2026, no dedicated primary legal framework for energy communities had been adopted. Although draft legislation had been under preparation for several years, it had not yet reached a final vote, limited practical implementation and direct stakeholder experience while leaving potential

initiatives without clear legal recognition, registration pathways or support mechanisms. This absence of a foundational framework represented the single most important contextual factor shaping the Ukrainian barrier profile identified through the questionnaire responses, which pointed to legal uncertainty, limited awareness and practical experience, financing constraints, technical capacity gaps and the need for clearer institutional support. The ongoing security situation further affected both the policy environment and the practical feasibility of citizen-led projects. The key challenge therefore remained moving from emerging policy interest toward an operational framework capable of enabling pilot initiatives and long-term scale-up.

However, the period between the completion of the stakeholder questionnaire (January–February 2026) and the finalisation of this deliverable saw two significant legislative developments. Draft Law No. 12087-d on the integration of Ukraine and EU energy markets was adopted by the Verkhovna Rada on 7 May 2026. An earlier version of the law included a provision requiring citizen energy communities to hold mandatory non-profit status — a requirement assessed as inconsistent with Directive (EU) 2019/944 and potentially restrictive for EC development. Following sustained advocacy by Ecoaction, in coordination with the Ministry of Energy and members of the Verkhovna Rada Committee on Energy and Housing and Communal Services, this provision was removed from the final adopted text. In parallel, a draft law transposing provisions on renewable energy communities in line with Directive (EU) 2018/2001 (RED II) passed its first reading on 29 April 2026, also without the non-profit restriction.

These developments represent the most significant institutional shift in the Ukrainian energy community landscape to date and directly address the highest-priority institutional barrier identified by stakeholders. They do not, however, resolve the full range of barriers documented below: secondary legislation, support schemes, administrative pathways, technical capacity and grid access remain largely unaddressed and will require sustained policy effort in the coming years.

Within SHAREs+, Ukraine's national partner Ecoaction has also played a direct role in shaping the legislative outcome through its advocacy work under Task T2.1, making the Ukrainian chapter a case where project activities contributed to tangible policy impact during the deliverable period itself.

5.5.2 Key barriers identified

The barrier table below reflects the situation captured by the questionnaire in early 2026, before the legislative developments described above.

Table 8: Identified barriers to citizen-led energy communities in Ukraine

Barrier	Rating*	Description & country context
A. Socio-Economic Barriers		
Low public awareness and limited direct experience	H	100% of respondents rated public awareness as low or very low; 71% of respondents had no direct EC experience.
High upfront costs and investment uncertainty	H	High upfront costs and uncertain return on investment were the leading financial barriers, while overall finance difficulty was perceived as medium to high.
Trust and collective-action experience	H	Lack of trust, lack of information and limited collective-action experience were strongly selected social barriers.
B. Institutional & Administrative Barriers		
Absent or unclear EC legal framework	H	86% rated legislation as very unclear or absent; all respondents selected missing support schemes as a legal/regulatory barrier. As of the questionnaire period, no

		primary EC legislation had been adopted. This has since changed with the April 2026 legislative developments, but secondary legislation and implementing rules remain absent.
Unclear procedures and weak coordination	H	Unclear administrative procedures and inter-authority coordination problems are central barriers for emerging initiatives.
Absence of one-stop-shop support	H	Most respondents reported no one-stop-shop support, leaving citizen groups without a clear institutional entry point.
C. Technical Barriers		
Limited local technical expertise	H	Lack of local expertise was selected by 86% of respondents, the highest among partner countries.
Grid connection complexity and costs	H	86% assessed grid connection as complex or very complex; high grid connection costs were also frequently selected.
Smart metering and data readiness	M	Smart metering is a secondary but important condition for future energy sharing models.

**H = High severity; M = Medium;*

Source: Ratings based on SHAREs+ stakeholder questionnaire responses and Catalogue of Barriers; complemented where relevant by available NCEF inputs

5.5.3 Analysis

The Ukrainian barrier profile is dominated by foundational constraints: unclear or absent legislation, missing support schemes, low awareness, limited technical expertise and grid connection challenges. The questionnaire results should be interpreted as an initial expert perception rather than a mature market assessment, because most respondents had no direct EC experience. Nevertheless, the pattern is clear: Ukraine requires enabling conditions before large-scale citizen-led deployment can be expected.

Socio-economic barriers are severe. All respondents rated public awareness as low or very low, and lack of trust, lack of information and limited collective-action experience were strongly selected. Financing is also important, but the main financial concern is less about loan procedure complexity and more about high upfront costs and investment uncertainty. This suggests that support should begin with information, demonstration projects and low-risk financing for public-interest uses.

Institutional and technical barriers are equally foundational. All respondents selected missing support schemes, and most rated legislation as unclear or absent. Administrative procedures are unclear and there is no effective one-stop-shop support. Technical barriers are among the highest across the partner countries: lack of local expertise, grid connection complexity and high connection costs all constrain potential initiatives. In this context, the priority should be to develop a basic legal and institutional route, while supporting demonstration projects that build confidence and local capacity.

It should be noted that the questionnaire and barrier assessment reflect the situation as of early 2026, before the adoption of Draft Law No. 12087-d and the first reading of the RES transposition law. While the identified barriers remain relevant as a baseline for understanding the challenges facing energy community development in Ukraine, the legislative progress achieved in April and May 2026, to which Ecoaction directly contributed through its advocacy work under Task T2.1, represents a concrete first step toward establishing the enabling framework that respondents identified as the highest priority.

The results of the stakeholder survey were further confirmed during the first NCEF session (May 2026), which was attended by municipalities, civil society organizations, technical experts, GIZ representatives and officials from the Ministry of Community and Territorial Development of Ukraine. Participants generally confirmed that the identified barriers reflect real implementation challenges, including the lack of clear secondary legislation, the absence of a single support mechanism and significant uncertainty regarding administrative and technical procedures. The discussion also highlighted new regulatory ambiguities related to the practical application of the Resolution of the Cabinet of Ministers No. 77, including the risks of ambiguous interpretation by municipalities and the need for formal national recommendations. These discussions confirmed the conclusion that institutional clarity, implementation recommendations and practical mechanisms to support municipalities and local initiatives remain priority needs for Ukraine.

5.5.4 Priority enablers and recommendations

- **Complete the legislative framework with implementing rules** – The adoption of primary legislation in April 2026 must be followed by secondary legislation that defines registration procedures, eligible legal forms, governance requirements, energy-sharing rules, and DSO interaction protocols. Without implementing rules, primary legislation remains inoperative.
- **Demonstration projects for resilience and public services** – Support pilots linked to municipalities, public buildings and critical local services to show practical value and build trust.
- **Technical assistance and training** – Create a targeted capacity-building programme for municipalities, CSOs and local technical actors, including project design and grid-connection guidance. The SHAREs+ Gateway and mentoring tools under WP4 can serve as a delivery channel, complemented by peer learning from more experienced partner countries.
- **Simplified procedures and one-stop-shop support** – Provide a single advisory entry point with templates, checklists and contacts for regulatory, administrative and technical steps.
- **Low-risk financing instruments** – Grants and guarantees for early-stage and high-impact projects should prioritise initiatives with clear public-interest benefits and a resilience dimension. International climate finance and EU neighbourhood funding instruments are the most realistic sources in the near term, given constraints on the national budget. Financing design should account for the elevated investment risk perception in the current security environment and should include simplified application procedures accessible to municipalities and civil society organisations.

6 | Conclusions and Recommendations

This deliverable has analysed the socio-economic, institutional, and technical barriers to citizen-led energy community projects across the five SHAREs+ partner countries, drawing on a structured stakeholder questionnaire (n=53), the National Citizens Energy Forums, and a targeted literature review. The analysis confirms that citizen-led energy communities in the SHAREs+ region face a common set of structural constraints, while the specific barrier profile and priority interventions differ by national context.

Four barriers are rated as high severity in all five countries: lack of grants and financial support schemes, difficulty identifying motivated local leaders, missing regulatory support and incentive schemes, and unclear administrative procedures. These represent the minimum enabling conditions that must be addressed in every partner country before citizen-led energy communities can move from isolated pilots to a replicable model.

Institutional and financial barriers consistently emerge as more severe than technical barriers. No partner country has yet established a fully functioning support framework for energy communities. Even where legislation has been formally transposed, as in Cyprus and Bulgaria, the operational gap between legal recognition and practical implementation remains the dominant constraint. Missing secondary legislation, unclear registration pathways, fragmented administrative responsibilities, and the absence of one-stop-shop services are reported across the region, with varying intensity.

Social barriers compound the institutional challenge. Lack of trust in cooperative models is rated as high in four of the five countries, and low public awareness is rated as high in four countries. These barriers cannot be addressed through information alone; they require visible demonstration projects, trusted intermediaries, and municipality-led initiatives that build confidence through practical experience. Romania's cooperative ecosystem offers a model that could be adapted for other contexts.

Technical barriers, while less uniformly severe, represent a critical implementation layer. Grid connection complexity is rated as high in Bulgaria, North Macedonia, and Ukraine, and smart metering infrastructure is a prerequisite for energy sharing in all five countries. In Cyprus, the isolated island grid and rising renewable curtailment present a distinctive technical challenge that energy communities with storage capacity could help address.

Based on the analysis, the following priority recommendations are addressed to national authorities, regulatory bodies, and project partners:

- **Establish clear and operational legal and administrative pathways** for energy community formation, including dedicated registration procedures, model statutes, and simplified licensing thresholds. This is the single most impactful intervention across all five countries.
- **Develop targeted financial instruments for the early stages of EC development**, including grants for feasibility studies, legal structuring, and technical project preparation. The current dependence on EU-funded or donor-funded support is not sustainable for scaling energy communities beyond pilot phase.
- **Create or strengthen one-stop-shop advisory services**, providing a single-entry point for citizens, municipalities, and community groups navigating the regulatory, administrative, and technical requirements. Countries with emerging services (Bulgaria, Romania) should consolidate them; countries without (Cyprus, North Macedonia, Ukraine) should establish them as a priority.

- **Invest in demonstration projects and peer learning**, using successful pilots to build public trust, train local leaders, and generate the practical experience that no amount of awareness-raising can substitute. Municipality-led projects and partnerships with existing civil society organisations are the most promising delivery mechanisms.
- **Clarify energy-sharing implementation rules**, including metering, billing, settlement, balancing, and DSO coordination arrangements. These operational details are the binding constraint in countries that have already adopted primary legislation.

These findings directly inform the subsequent WP2 deliverables: D2.2 will compile tools and solutions responding to NCEF feedback, and D2.3 will translate the barrier analysis into actionable policy guidance for each partner country. The SHAREs+ Gateway platforms, under development in WP4, will serve as the primary channel for delivering practical support to emerging energy community initiatives across the five countries.

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Annex I Questionnaire on Barriers to Energy Communities for SHAREs+ Project

Introduction and Consent

Thank you for participating in this interview/survey about barriers to the development of energy communities. This questionnaire is part of the SHAREs+ project and aims to support research on socio-economic, institutional, and technical challenges affecting energy community launch and scale-up.

Your participation is voluntary. All responses will be treated confidentially and used exclusively for research and analysis within the SHAREs+ project. No personal data will be shared publicly, and all results will be reported in aggregated form.

Estimated completion time: 8-10 minutes

Background Information:

- Participant email: _____
- Country:
- Date: _____

Section A: Stakeholder Background

1. What is your role in relation to energy communities?
   □ Policy maker/government official
   □ Local authority representative
   □ Energy community pioneer/founder
   □ Energy community member
   □ Technical/financial expert
   □ Civil society organization
   □ Academic/researcher
   □ Other: _____
2. How many years of experience do you have with energy communities?
   □ No experience
   □ Less than 1 year
   □ 1-3 years
   □ 4-7 years
   □ More than 7 years

Section B: Political and Policy Barriers

3. How would you rate the clarity of national legislation for energy communities in your country?
   □ Very clear
   □ Mostly clear

□ Somewhat unclear
□ Very unclear
□ No legislation exists
□ I don't know / Not familiar

4. What are the main legal/regulatory barriers? (Select up to 3)
□ Lack of clear definition of energy communities
□ Complex bureaucratic procedures
□ Lengthy authorization processes
□ Conflicting regulations between authorities
□ Missing support schemes
□ I don't know / Not familiar with regulatory barriers
□ Other: _____

5. How would you assess the level of support from local authorities?
□ Very supportive
□ Somewhat supportive
□ Neutral
□ Somewhat unsupportive
□ Very unsupportive
□ I don't know

Section C: Economic and Financial Barriers

6. How difficult is access to financing for energy community projects?
□ Very easy
□ Somewhat easy
□ Moderate
□ Somewhat difficult
□ Very difficult
□ I don't know / No experience

7. What are the main financial barriers? (Select up to 3)
□ High upfront investment costs
□ Lack of available grants
□ Insufficient or unfair feed-in tariffs
□ Complex loan procedures
□ Uncertain return on investment
□ I don't know / Not familiar with financial barriers
□ Other: _____

8. How would you rate electricity prices in your country as a factor for energy community development?
□ Very favorable (high prices encourage communities)
□ Somewhat favorable
□ Neutral
□ Somewhat unfavorable (low prices discourage communities)
□ Very unfavorable
□ I don't know

Section D: Social and Cultural Barriers

9. How would you rate public awareness about energy communities in your country?
   □ Very high
   □ High
   □ Moderate
   □ Low
   □ Very low
   □ I don't know

10. What are the main social barriers? (Select up to 3)
   □ Lack of trust in cooperative models
   □ Limited experience with collective actions
   □ Lack of information about benefits
   □ Cultural preference for individual ownership
   □ Low environmental awareness
   □ I don't know / No sufficient information
   □ Other: _____

11. How easy is it to find motivated local leaders ("local heroes")?
   □ Very easy
   □ Somewhat easy
   □ Moderate
   □ Somewhat difficult
   □ Very difficult
   □ I don't know

Section E: Technical and Technological Barriers

12. How would you rate the complexity of grid connection procedures?
   □ Very simple
   □ Somewhat simple
   □ Moderate
   □ Somewhat complex
   □ Very complex
   □ I don't know / No technical experience

13. What are the main technical barriers? (Select up to 3)
   □ Complicated grid connection procedures
   □ High grid connection costs
   □ Lack of smart meters
   □ Inadequate IT systems from DSOs
   □ Lack of technical expertise locally
   □ I don't know / Not familiar with technical barriers
   □ Other: _____

14. How long does a typical grid connection process take?
   □ Less than 3 months

□ 3-6 months
□ 6-12 months
□ 1-2 years
□ More than 2 years
□ I don’t know

Section F: Administrative and Institutional Barriers

15. How many different authorities must you typically interact with to establish an energy community?
    □ 1-2
    □ 3-5
    □ 6-10
    □ More than 10
    □ I don't know

16. Are there "one-stop-shop" services available for energy communities in your country?
    □ Yes, very comprehensive
    □ Yes, but limited scope
    □ Some initiatives exist
    □ No, but planned
    □ No such services
    □ I don’t know

17. What administrative barriers have you encountered? (Select up to 3)
    □ Multiple approval requirements
    □ Unclear procedures
    □ Long processing times
    □ High administrative costs
    □ Lack of coordination between authorities
    □ I don’t know / No direct experience
    □ Other: _____

Section G: Solutions and Enablers

18. What do you consider the most important enablers for energy community development? (Select top 3)
    □ Clear legal framework
    □ Financial incentives/grants
    □ Simplified procedures
    □ One-stop-shop services
    □ Public awareness campaigns
    □ Technical support services
    □ Training programs
    □ Other: _____

19. What specific support would be most valuable for your country? (Select top 3)
    - □ Policy development assistance
    - □ Capacity building programs
    - □ Financial instruments
    - □ Technical assistance
    - □ Communication tools
    - □ Best practice sharing
    - □ Other: _____

Section H: Additional comments

20. Do you have any additional comments, examples, or suggestions related to barriers or enablers for energy community development in your country?

_____

_____

_____

Thank you for your participation. Your insights are valuable for advancing energy community development across Europe within the SHAREs+ project.

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