

Urgent measures to reinforce the electricity system (RD-Law 7/2025)

Legal Alert



July 2025

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As part of recent energy sector challenges, on 25 June 2025 the Official State Gazette (Boletín Oficial del Estado, BOE by its Spanish acronym) published of [Royal Decree-Law 7/2025](#) of 24 June 2025, approving urgent measures to reinforce the electricity system.

On 28 April 2025, the **Iberian electricity system** experienced a “**zero voltage**” event, prompting an electricity crisis to be declared and the emergency system to restore the system implemented.

The National Security Council agreed to create a Committee within the General State Administration (GSA) to analyse the circumstances of the electricity crisis and draw conclusions. The Government presented its findings on 17 June 2025, according to which the blackout was caused by a number of factors.

RD-Law 7/2025 of 24 June 2025 aims to provide a legislative response to the electricity crisis and includes some of the measures proposed by the Committee.

The RD-Law generally **entered into force** on the date of its publication in the BOE, i.e. **25 June 2025**. A brief description of the most noteworthy new measures introduced by this RD-Law in respect of the electricity system follows below:

I. Resilience of the electricity system

The first block of measures (articles 1 to 7) centres on enhanced monitoring and verification of compliance by all electricity system players, and data transparency.

✓ Specific instructions on reporting and inspection issued to the CNMC for monitoring and verification purposes

The Spanish National Markets and Competition Commission (CNMC) has been instructed to draw up a **report** on compliance by electricity system players, particularly regarding the obligations concerning voltage control and service restoration. A **6-month time limit** has been granted to the CNMC in this connection.

The CNMC has a period of **12 months** in which to complete an **extraordinary inspection plan to assess the restoration capabilities** of all players involved in the restoration process, paying particular attention to black-start units, combined cycle power plants and distribution networks, including all components thereof of 1 kV and more. This will be a periodic inspection plan, to be carried out every 3 years.

✓ Instructions to the system operator

The system operator (REE) must provide the CNMC and the competent environmental state authority (*Ministerio para la Transición Ecológica y Reto Demográfico*, MITERD, by its Spanish acronym) with the results of an **analysis and review process**, which may include a **proposal for the regulatory amendment** of certain aspects of system operation:

- Within a **period not exceeding 6 months**, a **new voltage change rate response regulation** that goes beyond the setting of static maximum and minimum operating voltage values, will be analysed.
- Within a **period not exceeding 12 months**, a **proposal for an electricity system operating procedure** will be analysed to establish coordination between the development plans of the transmission and distribution networks.
- The **minimum monitoring requirements** for **incident analysis** will be analysed within a period not exceeding **15 months**.

✓ Responsibility regarding shared grid connection infrastructure

Electricity producers and owners of storage facilities that transmit power to the same connection point using a shared network connection infrastructure must sign an **agreement setting out the distribution of responsibilities** of the various producers, of which the authorities must be notified prior to obtaining the Prior Administrative Authorisation (PAA). This obligation will also apply to new parties using the shared infrastructure (for which the agreement must be updated) and to facilities that already have a PAA in force. These facilities have one year in which to submit the aforementioned agreement to the authorities that issued their administrative authorisations.

Failure to execute the agreement will mean that the **distribution of responsibilities** of the owners of production and storage facilities transmitting power via the same infrastructure will be determined in **proportion to the access capacity** granted by their access and connection permits.

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II. Storage and flexibility

Articles 8 to 21 of the RD-Law provide for measures such as the following:

✓ DPU for storage facilities

With a view to promoting the storage and integration of non-dispatchable renewable energy, article 54.1 of Law 24/2013 of the Electricity Sector, of 26 December 2013 (ESL) is amended to expressly recognise **declarations of public utility (DPU) for storage facilities and the related network connection infrastructures** that inject power into the transmission and distribution networks.

✓ Administrative simplification

The procedures to authorise and commission storage and grid flexibility facilities are optimised.

- Authorisation for **hybrid electrochemical storage in renewable projects** at facilities falling under the authority of the State Administration is declared **urgent**.
- The new legislation provides for the **joint and simplified processing of the PAA and the Administrative Authorisation for Construction (AAC)**, at the request of the developer, halving project timelines. The environmental assessment shall in any case follow the simplified procedure (unless exempted).
- Where storage is to be hybridised with generation projects for which a favourable Environmental Impact Statement (EIS) has already been obtained, the hybridisation project is exempt from environmental assessment provided that the storage is located within the generation project site boundary.

✓ Definition of installed capacity

- Within a period of 12 months, the Government will pass regulations to amend the definition of **installed capacity of an energy generation and/or storage facility**.

Until this definition is approved, and solely for the purposes of **issuing the administrative authorisations** provided for in article 53 of the ESL (the PAA, AAC and administrative operating authorisation -AOA-), the installed capacity of a facility consisting of one or more power park modules and/or one or more electrochemical storage modules connected to the network via the same inverter or the same set of inverters will be deemed to equal the maximum capacity of the shared inverter(s).

✓ Prioritisation of hybrid storage

- **Redispatch priority** is established to avoid penalising hybridisation, meaning that renewable energy generation facilities with storage will be prioritised over other technologies (including stand-alone storage, which will not benefit from this amendment).

✓ Flexibility of the electricity system

The participation of **independent aggregators** in balancing markets and services, and the introduction of new flexibility services in electricity markets are encouraged.

✓ Capacity mechanisms

Capacity mechanisms are adapted to respond to renewable energy generation volatility and demand.

To implement this, it falls to:

- the head of MITERD to establish capacity mechanisms to ensure that demand is covered; and
- the competent energy state authorities (*Dirección General de Política Energética y Minas*) to establish a set of parameters to quantify the level of security of supply to be safeguarded by means of these regulatory instruments.

It is acknowledged that storage facility access and connection permits will be **flexible** from a demand perspective.

III. Electrification

Various measures aimed at increasing electricity demand are promoted (articles 22 to 28 of the RD-Law), by making better use of existing networks and measures focused on industrial electrification and energy applications, such as mobility and air conditioning.

✓ Measures to make electricity transmission network planning more flexible

- A review will take place within a maximum period of 3 years from approval of the electricity transmission network plan, triggering the launch of a new electricity planning process.
- A new mechanism for planning connection points to feed demand is introduced: starting on 1 October 2025, every 4 months, the system operator will send the Secretary of State for Energy a report containing a list of transmission network nodes where it is possible to include new connection points in the transmission network development plan, provided that certain conditions –outlined in article 4 bis of the ESL, are simultaneously met for each of them.

✓ Expiry of unused capacity and access and connection permits

Article 26.5 of [Royal Decree 1183/2020](#) on access and connection to the electricity transmission and distribution networks has been amended and two additional paragraphs, 6 and 7, have been added.

In the case of access permits for storage facilities that inject electricity into the transmission or distribution networks, the permit for facilities that consume electricity from the network shall terminate upon expiration of the access permit linked to such facilities' status as a power generation facility.

In the event of termination of the access or supply agreement, the access and, as applicable, access and connection permits will remain in force for a period of 5 years from the date of termination of the agreement for facilities with a high voltage connection point, and 3 years for low voltage facilities.

✓ Reactivation of the support mechanism for the electricity-intensive industry

Effective between 23 January 2025 and 31 December 2025, a support mechanism is implemented for the electricity-intensive industry, consisting of an 80% reduction in the electricity bill covering the cost of the electricity transmission and distribution network access tolls applicable at any given time.

✓ New types of self-supply

Consumers may now be simultaneously associated with two types of self-supply, namely:

- Individual self-supply without surplus (e.g. self-supply for an industrial plant); and
- Self-supply using nearby facilities that are connected via the network (e.g. proximity generation potentially available in the industrial estate or environment in which the industry is located).

✓ Electrification of mobility and administrative simplification

With a view to facilitate the installation of charging points and thus decarbonising the transport sector, the electrical infrastructure for electric vehicle charging stations with a capacity exceeding 3,000 kW is exempted from the authorisation regime provided for in article 53 ESL, limiting the need for authorisation to scenarios where the public utility of the facilities is to be recognised or where a project is expected to be required to undergo an environmental impact assessment.

In addition, electricity system operators are expressly authorised to collect and jointly process dynamic and static information on electric charging points, in accordance with the provisions of Appendix III to MITERD Order TED/445/2023 of 28 April 2023.

✓ Electrification of air conditioning

The [Condominium Property Law](#) has been updated to introduce measures to facilitate the adoption of heat pump installations (e.g. air source and ground source heat pumps). It has now been clarified that these technologies are also included within the framework of property owners association decision-making processes regarding the installation of renewable energy systems.

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✓ Tax measures

Royal Decree-Law 7/2025 introduces local tax measures aimed to encourage industrial and air conditioning electrification.

- For the purposes of calculating the **tax on economic activities**, capacity relating to electric heating systems and boilers is excluded from the calculation of installed capacity, thus representing a further exemption over and above that already in place for furnaces and boilers that use solid, liquid or gaseous fuels.
- **Allowances** are introduced in respect of **property tax** (up to 50%) and the **tax on construction, installations and works** (up to 95%) to encourage the installation of environmental thermal energy systems, such as air source energy. These are similar to the allowances already in place for solar energy systems.

✓ Repowering of operational production facilities

The **repowering of a production or storage facility** means the renovation of the facility. Such renovation may include the total or partial replacement of installations or operating systems and equipment, with the aim of replacing machines, improving efficiency, increasing the energy produced by the facility, increasing the installed capacity, or of fulfilling all or several of the above objectives.

Processing times, both substantive and environmental, for procedures initiated after the entry into force of RD-Law 7/2025 are **halved** for facilities for which administrative authorisations and environmental impact assessments are requested in order to repower by an additional amount not exceeding 25% of the original installed capacity.

✓ Orderly rollout of renewables. Modification of administrative milestones.

[RD-Law 23/2020, approving economic recovery measures in the energy and other sectors](#)

establishes measures for the orderly incorporation of renewable energy production facilities into the electricity system, requiring developers to concentrate development and execution within a tight timeframe through the achievement of certain **administrative milestones** (for a more detailed analysis of this legislation, see the [Legal Alert](#) prepared in this connection).

RD-Law 7/2025 introduces a number of changes to the administrative milestones provided for in RD-Law 23/2020:

- The AOA has been **split into 2 phases** (article 53.1 of the ESL), with [Royal Decree 1955/2000](#) setting out a procedure for obtaining a provisional AOA and a subsequent definitive AOA.
The administrative milestone consisting of obtaining the AOA is linked to receipt of the provisional AOA.
- **Time limits** for achievement of the administrative milestones are suspended where the developer demonstrates the existence of a precautionary measure entailing the suspension of the effectiveness of the administrative authorisations granted as a result of the filing of an administrative appeal or an appeal for judicial review.
- Administrative milestone deadlines are extended to **12 years for pumped storage hydroelectric technology** and **9 years for offshore wind technology**.
- The deadline for **obtaining a provisional AOA has been extended, on an exceptional basis, up to a maximum of 8 years**, provided that such extension is **applied for within 2 months** of the entry into force of RD-Law 7/2025, or **within 2 months of receipt of the AAC**.

The exceptional extension of the deadline relating to the 5th administrative milestone provided for in article 1 of RD-Law 23/2020, for facilities for which access and connection permits have been secured (article 32 of RD-Law 7/2025), is scheduled to enter into force on 24 June 2025 (final provision 7 of the RD-Law).

- The deadline for demonstrating receipt of a provisional AOA has been automatically extended until 25 September 2025 for all facilities required to demonstrate achievement of this milestone on 25 June 2025.

Our team of professionals are available to expand upon or clarify any of the matters dealt with above.

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