

PORTUGUESE RENEWABLE'S LEGAL UPDATE

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The first semester of 2025 has not seen as many regulatory developments as initially expected mostly due to the fall of the Portuguese Government in April and its re-election in May. Nevertheless, several relevant new regulations have been enacted impacting areas such as the first Portuguese offshore wind tender, intensive electricity consumers, grid information transparency, grid access, and PPAs. Please find below the main legislative and regulatory developments adopted by national lawmakers and regulators affecting the Portuguese renewable energy sector from January to June 2025.

I. National legislation

Resolution No. 19/2025 of the Council of Ministers (07.02.2025)

Approves the Allocation Plan for Offshore Renewable Energy, which defines the areas and volumes of the national maritime space, in the continental subdivision, for the commercial exploitation of renewable energy of ocean origin or location, including Annexes I to III to this resolution, which form an integral part thereof.

For more information on this subject, please refer to our [newsletter](#) of 10 February.

Ordinance No. 96/2025/I (12.03.2025)

Approves and defines the requirements of the TFA — Technological Free Area for renewable energy of ocean origin or location, off the coast of Viana do Castelo.

Resolution No. 127/2025 of the Parliament (10.04.2025)

Approves the update of the National Energy and Climate Plan 2030 (NECP 2030), as set out in the annex to this resolution, which forms an integral part thereof.

For more information on this subject, please refer to our [newsletter](#) of 4 November 2024.

Order No. 4752/2025 (21.04.2025)

Establishes the model for the competitive procedure for the development of offshore wind power production in Portugal, in accordance with the objectives of the National Energy and Climate Plan 2030.

For more information on this subject, please refer to our [newsletter](#) of 22 April.

Ordinance No. 203-A/2025/I (24.04.2025)

Amends [Ordinance No. 112/2022](#), of March 14, which rules the Electro-Intensive Consumer Status. Its aim is to align the national framework with European State aid rules, in order to strengthen industrial competitiveness and the commitment to the energy transition.

For more information on this subject, please refer to our [newsletter](#) of 30 April and to our [paper](#) on intensive electricity consumers, both available at our website.

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Ministerial Order No. 170/MAEN/2025 (19.05.2025)

Determines the extension, for a period of 12 months of the deadlines referred to in paragraph 1 of Joint Order No. 1/SEAMB/SEENC, of the Secretary of State for Energy and Climate and the Secretary of State for the Environment, dated February 22, 2024, as amended by the Rectification Statement of the Secretary of State for Energy and Climate, dated February 23, 2024.

For more information on this subject, please refer to our newsletter of 21 May.

Decree-Law No. 79/2025 (21.05.2025)

Amended the legal framework of the Portuguese National Gas System enacted by Decree-Law No. 62/2020 and Decree-Law No 70/2020, by updating the legal definitions of “natural gas” and “low-carbon gases” and introducing new ones such as “low-carbon hydrogen” and “renewable hydrogen”), ensuring their integration into the national gas framework, and amending the licensing framework by requiring all requests and notifications to be submitted via online platform.

For more information on this subject, please refer to our newsletter of 28 May.

Decree-Law No. 85/2025 (24.06.2025)

Set binding targets for the integration of energy from renewable sources in the industry and transport sectors in line with Directive (EU) 2023/2413 (commonly known as RED III), which amends Directive (EU) 2018/2011.

In the industry sector, at least 42% of the hydrogen used must be of renewable origin by 2030, increasing to 60% by 2035.

In the transport sector, Member States must achieve one of the following targets by 2030: (i) a 14.5% reduction in greenhouse gas emissions through the use of renewable energy, or (ii) at least 29% of final energy consumption comes from renewable sources.

2. DGEG rulings

Data on electricity injection capacities into the National Transmission Grid and the National Distribution Grid as of 31 December 2024 (05.02.2025) and 31 March 2025 (07.05.2025)

Starting in 2025, DGEG began publishing quarterly data on electricity injection capacities into the national transmission and distribution grids.

For more information on this subject, please refer to our newsletter 11 February.

Order No. 1859/2025 (10.02.2025)

Sets out the procedures to be followed for the licensing of energy storage facilities.

For more information on this subject, please refer to our newsletter of 12 February.

Order No. 14/2025 (02.04.2025)

Provides clarification regarding the interpretation of the construction deadlines applicable to production and operation licenses. This clarification follows the amendments introduced by Decree-Law No. 99/2024, which updated the regulatory framework for renewable energy, partially transposing the RED III Directive, and amended Decree-Law No. 15/2022. Among its key provisions, the revised framework established that the construction period is excluded from the timeframe for issuing the operation license.

For more information on this subject, please refer to our [newsletter](#) of 3 April.

Order No. 12/DG/2025 (10.03.2025)

Sets out the procedures for maintain the registrations of pre-existing micro-production units and for converting them into self-consumption production units.

For more information on this subject, please refer to our [newsletter](#) of 12 March.

Order No. 17/2025 (09.04.2025)

Determines that the duration of the remuneration schemes shall be counted from the date of the operating license of the electricity generation facilities.

Amendment to the joint Order of APA and DGEG (05.05.2025)

Updated the rules established in July 2023 for Environmental Impact Assessment (EIA) procedures and case-by-case analysis of renewable energy production and energy storage projects.

For more information on this subject, please refer to our [newsletter](#) available on our website.

Order No. 6756/2025 (24.06.2025)

Approves the draft of the agreement for adhesion or conversion to the Electro-Intensive Consumer Status and the draft of the agreement for the conditional adhesion to the Electro-Intensive Consumer Status.

3. ERSE rulings

Directive No. 3/2025 (06.02.2025)

Establishes the general conditions for grid access agreement with output restrictions for production or standalone storage facilities, under the framework of the [Grid Access and Interconnection Regulation](#) (RARI).

For more information on this subject, please refer to our [newsletter](#) of 5 February.

Directive No. 6/2025 (26.03.2025)

Approves the rules governing the conduct of auctions for the purchase of electricity generation under guaranteed remuneration schemes or other incentive-based support mechanisms.

These auctions are procurement mechanisms through which electricity from producers under guaranteed or bonified remuneration schemes (such as feed-in tariffs or contracts for difference) is offered to market suppliers, aiming to guarantee a minimum financial compensation to producers for their output, regardless of market price fluctuations, while enabling suppliers to acquire electricity through an open, competitive, transparent, and non-discriminatory process.

4. Public consultations

Public consultation for the revision of the Manual of Procedures for Global System Management (MPGGS) (02.01.2025).

The MPGGS establishes the operating rules for Global System Management (GSM) conducted by the transmission system operator (TSO), ensuring the security and operation efficiency of the National Electricity System (SEN) and the effective functioning of the ancillary service markets.

The public consultation closed on 13 February 2025.

For more information on this subject, please refer to our [newsletter](#) of 8 January.

Public consultation on the proposed Development and Investment Plan for the National Electricity Transmission Grid (06.01.2025)

Key highlights of the plan include an increase in installed capacity of renewable energy projects by approximately 30 GW by 2034 bringing the total to nearly 45 GW – of which 23 GW are of solar photovoltaic capacity (compared to 6.5 GW installed by 2024).

The public consultation closed on 17 February 2025.

ERSE's opinion, the public consultation report, and all submitted comments are available on the [ERSE's website](#).

For more information on this subject, please refer to our [newsletter](#) of 8 January.

Public consultation on the Procedures Manual for the Activity of Registration and Bilateral Contracting of Electricity (MP PPA) (20.05.2025)

The MP PPA establishes the operational rules of the OMIP Platform, which supports the new activity of energy bilateral contracting enacted by [Decree-Law No. 99/2024](#) and further regulated by [Ordinance No. 367/2024/I](#). Through the OMIP Platform, it will be possible to:

- Disclose contractual terms for the negotiation and execution of PPAs, thereby facilitating the matching of supply and demand;
- Choose standard clauses and contract templates to support the drafting of more balanced and secure PPAs;
- Connect renewable energy supply and demand, fostering negotiation, transparency, and liquidity in the PPA market.

This public consultation closed on 20 June 2025, but report and documents not yet available.

For more information on this subject, please refer to our [paper](#) on the OMIP Platform we published last June.

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