

PORTUGAL SIMPLIFIES ENERGY STORAGE PROJECTS' LICENSING

Following the 28 April blackout, DGEG and APA have simplified the procedures for energy storage projects:

- The grid operators can now issue injection capacity declaration needed for the prior evaluation or Environmental Impact Assessment (EIA) of autonomous storage projects.

- Behind-the-meter storage facilities in projects that already obtained a TRC and standalone storage facilities below 50 MW/200 MWh, or 20 MW/80 MWh in sensitive areas are exempt from EIS.

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DGEG, the Portuguese energy ministerial department, and APA, the Portuguese Environment Agency, published two joint orders updating the Environmental Impact Assessment (“**EIA**”) and Capacity Reservation Title (“**TRC**”) procedures for energy storage projects that were set by a [previous joint order](#) dated 14 July 2023.

These changes follow the blackout in the Iberian Peninsula on April 28, 2025, highlighting the need for energy storage to help keep the power grid stable and secure by encouraging the use of storage systems.

The [first joint order](#), published last July 30, introduces the following changes:

- The injection capacity declaration to the Public Electricity Grid (“**RESP**”) is now issued directly by the grid operator, but only to start the prior evaluation or EIA request for autonomous storage projects on the SILiAmb platform. This declaration does not replace the TRC, which remains mandatory at a later stage to obtain the right to inject into the grid.
- Early-stage projects that have already paid for grid studies but do not yet have the TRC can now begin the EIA with a preliminary study or draft design.

The [second joint order](#), of July 31, clarifies when energy storage projects are exempt from EIA and case-by-case analysis:

- For co-located storage, adding a storage facility to a project that already has a TRC and is in the same licensed area does not need a new EIA or a new Environmental Compliance Declaration (“**DCAPE**”) if these were already approved. The developer only needs to provide proof during post-evaluation that all conditions are met.
- For autonomous storage, projects up to 50 MW/200 MWh, or up to 20 MW/80 MWh in sensitive areas, are exempt from EIA without case-by-case analysis,

In both cases a minimum distance of 5 meters between the storage facility and the fenced project area boundary is required.

These orders came into effect the day following their publication.

Although these are positive updates, the [DGEG's Q2 2025 grid capacity report](#) shows no significant capacity for standalone storage projects in Portugal's electricity grid as of 30 June 2025. And, as the TRC submissions under the general access regime remain suspended for both production and storage projects, the practical impact of these new rules will be limited for autonomous storage initiatives.

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