

# Royal decree-law 7/2025, of 24 June, approving urgent measures to reinforce the electricity system



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On 25 June 2025, Royal Decree-Law 7/2025, of 24 June, approving urgent measures to reinforce the electricity system (**RD-L 7/2025**) was published in the Official State Gazette (BOE). Among the important new features introduced by this Royal Decree-Law, we highlight here the following, relating to the processing of renewable energy installations and the promotion of energy storage (and whose entry into force coincides with the date of its publication):

# I. Modification of the commissioning administrative authorization procedure

The process for obtaining the commissioning administrative authorization is modified, expressly regulating (i) the obtaining of the provisional commissioning administrative authorization for testing ("**AAEP**") as a mandatory procedure for production and storage installations, and (ii) the obtaining of the definitive commissioning administrative authorization ("**AAED**"), following the energization and testing of production and storage installations.

The AAEP application will be submitted together with a final works certificate and will allow for prior registration in the administrative registry of electricity production installations ("**RAIPEE**"), and the AAED application will be submitted together with the Definitive Operational Notification and will allow for definitive registration in the RAIPEE.



# II. Changes in the administrative processing deadlines of installations

## Modification and extension of the 5th administrative milestone of Royal Decree-Law 23/2020

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RD-L 7/2025 modifies Royal Decree-Law 23/2020, of 23 June, which approves measures in the field of energy and other areas for economic reactivation (the “**RD-L 23/2020**”) and Royal Decree-Law 8/2023 of 27 December, which adopts measures to address the economic and social consequences of the conflicts in Ukraine and the Middle East, as well as to mitigate the effects of drought (the “**RD-L 8/2023**”), with regard to compliance with and extension of the 5th administrative milestone. Specifically:

- i) The 5th administrative milestone is now considered to be met with the accreditation of obtaining the AAEP instead of the AAED.
- ii) Exceptionally, facilities that had obtained grid access and connection permits after 27 December 2013 and prior to RD-L 7/2025 may request an extension of the 5th milestone (without the total period for obtaining the AAEP exceeding eight years) within two (2) months from the entry into force of RD-L 7/2025 or from obtaining the administrative authorization for construction (“**AAC**”) if this is later.
- iii) Those installations that have obtained an extension of the 5th milestone in accordance with RD-L 8/2023 may request an advance or delay of the date chosen at the time within the maximum limit of eight years.
- iv) The deadline for the accreditation of the 5th milestone is automatically extended until 25 September 2025 for those installations that should have accredited it before 25 June 2025. These installations may also request the extension of the 5th milestone.

## Suspension of deadlines for the administrative milestones of RD-L 23/2020 as a result of the adoption of precautionary measures

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Following the case law of certain courts (e.g., [Order 3465/2025 of the Supreme Court](#)), RD-L 7/2025 establishes the suspension of the calculation of the deadlines for the accreditation of compliance with the administrative milestones of RD-L 23/2020 in the event of the adoption of provisional (administrative) or precautionary (judicial) measures that involve the suspension of the administrative authorizations granted as a result of the filing of an administrative or contentious-administrative appeal.

In such cases, the developer must:

- i) Provide proof of this circumstance to the grid manager and the administrative body responsible for granting the administrative authorizations; and
- ii) Communicate the lifting of the precautionary measures – when this occurs – within a maximum period of three months, as failure to do so within the aforementioned period will lead to the automatic expiry of the grid access and connection permits.

## Other new features

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Finally, partial provisional commissioning administrative authorizations may be issued for the purpose of carrying out tests on the common evacuation infrastructures, provided that the total evacuation of the energy generated is guaranteed, and this is expressly stated in the permit. Thus, when one of the developers wishes to commission its installation before the lead developer processes the common infrastructures, the Government Delegations or Sub-delegations may issue this partial authorization in the name of the corresponding developer. This authorization may be referenced in order to extend the provisional commissioning administrative authorization for testing of the other production installation.

# III. Modification of the definition of installed capacity

The definition of installed capacity of generation and/or storage installations is expected to be modified by Royal Decree within 12 months.

Until then, the installed capacity of an installation made up of one or several power plant modules and/or one or several electrochemical storage modules that are connected to the grid through the same inverter or set of inverters will be the maximum capacity of the inverter or inverters common to all of them.

If the installations share the same transformer, the installed capacity shall be the maximum capacity of the transformer, unless they share an inverter or set of inverters and their

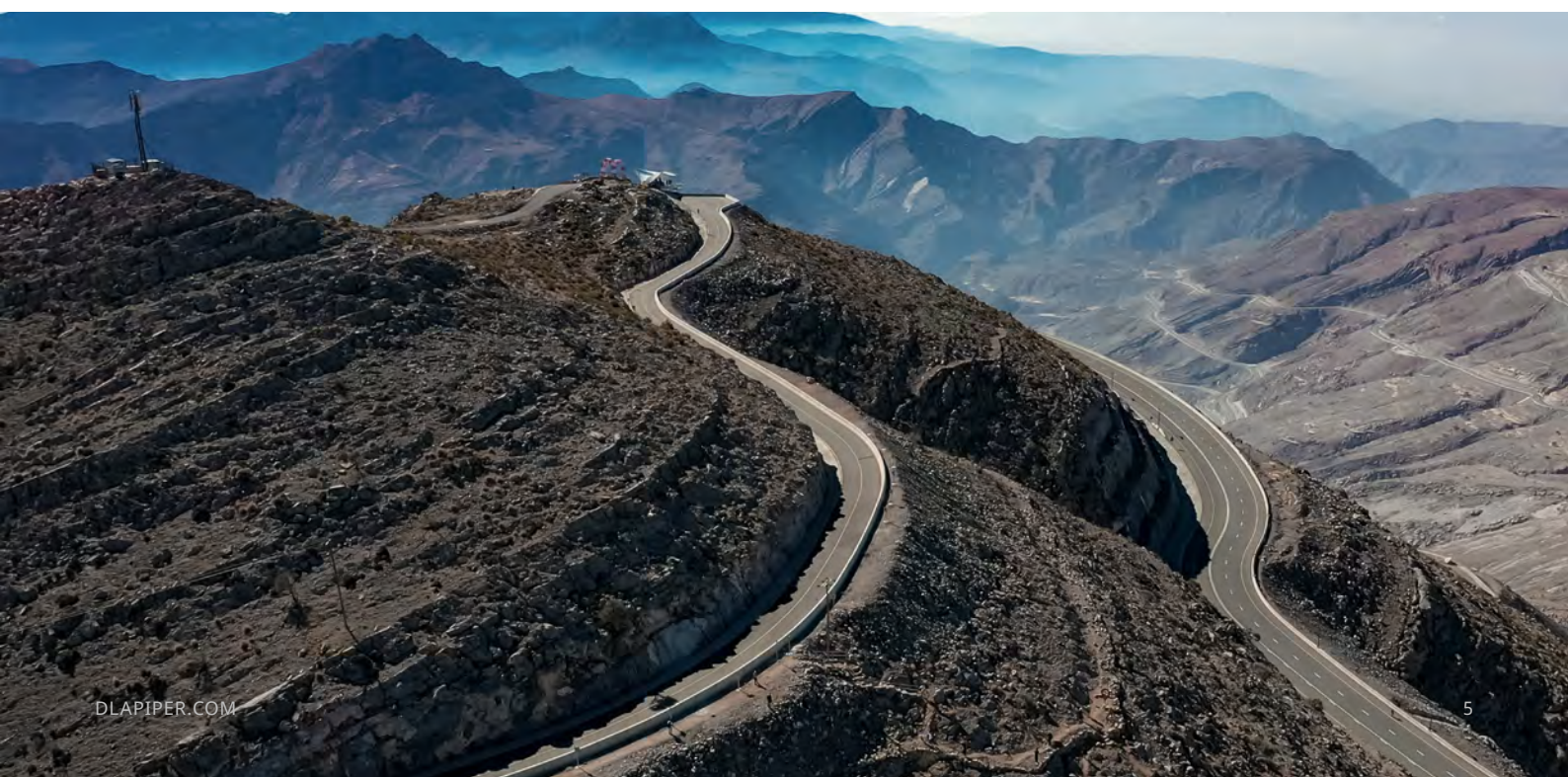
capacity is lower than that of the transformer, in which case the installed capacity shall be the maximum capacity of the inverter or set of inverters.

If a synchronous generation module forms part of the installation, the capacity will be the sum of the installed capacity of the synchronous generation module and the installed capacity of the power plant module.

In those cases, in which this new definition implies a change in the competent administration for its processing, it will continue to be processed by the original administration.

# IV. Developers' agreement regarding shared evacuation infrastructures

- i) The developers of production and storage installations that evacuate energy through shared evacuation infrastructures will be jointly and severally liable to the electricity system for any event, request, act or omission related to said infrastructures.
- ii) Prior to obtaining the prior administrative authorization ("AAP"), developers using such infrastructures must communicate an agreement establishing the division of responsibilities between them, without any of them being exempted or delegating responsibilities to third parties. Projects that already have an AAP in place must submit this agreement within one (1) year. Failure to submit such an agreement will mean that the distribution of responsibilities will be proportional to the access capacity of the installations.



# V. Fostering the repowering of installations

In addition to transposing the definition of repowering of [Directive \(EU\) 2018/2001](#), the following measures are established to promote repowering:

- i) Simplification of the administrative authorization regime, by halving its deadlines when the increase in installed capacity is less than 25% of the original capacity.
- ii) Streamlining the environmental impact assessment of repowered projects by limiting the evaluation to the additional impacts resulting from the repowering, compared to the original project.



# VI. Promotion of storage and hybridisation with storage

RD-L 7/2025 introduces major new features to promote system flexibility and storage. Specifically, with regard to energy storage, the following modifications have been adopted in relation to its processing:

- (i) Storage facilities are declared of public utility, allowing the establishment of easements and the compulsory expropriation of land.
- (ii) The environmental assessment of projects hybridized with electrochemical storage whose processing corresponds to the General State Administration (a) will be limited to the additional impact of the hybridization of the original project, and (b) will not be necessary when the installation is located within the polygonal area of the original project that already has an environmental impact declaration.
- (iii) Likewise, hybridization with storage processed before the General State Administration will benefit from joint processing of the AAP and the AAC, and from an emergency procedure when neither a declaration of public utility nor an environmental impact declaration is required.
- (iv) Storage facilities with an installed capacity of up to 500kW are excluded from the AAP and AAC regime.
- (v) Grid access and connection permits for storage facilities with discharge to the grid will be flexible access permits from a demand perspective.
- (vi) The priority of redispatching (*redespacho*) for the evacuation of the energy produced to the grid is modified, giving priority to installations that incorporate storage that does not consume energy from the grid and those that consume energy from the grid and have an installed capacity of the storage module equal to or less than that of the generation module.
- (vii) Their connection is facilitated as they are not considered as "pure consumers" from the demand perspective.

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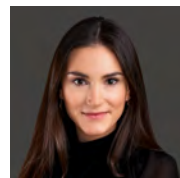
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