



THE INSTITUTIONAL DIALOGUE PROJECT OF THE GREEN LIVING AREAS MISSION

Enabling Local Energy: How Umbrella Entities Make Energy Communities Scalable and Replicable

POLICY BRIEF

ABSTRACT

Local energy communities are expanding throughout Europe; however, municipal-level implementation remains inconsistent, primarily due to insufficient sustained capacity to manage procedures and provide ongoing support beyond individual projects. This brief focuses on umbrella entities (second-level cooperatives, federations, and dedicated support platforms) as practical delivery mechanisms that can operationalise enabling frameworks in the energy domain.

Early evidence shows that umbrella entities lower transaction costs, standardise tools and processes, accelerate project development, and support collaboration with local authorities, while also aiming to expand participation beyond well-resourced groups.

The brief recommends several policy actions to enhance the effectiveness and replicability of these models, bridging the implementation gap to move beyond individual projects.

Keywords: *Energy communities (RECs/CECs), Umbrella entities, Enabling frameworks, Municipal collaboration, One-stop helpdesks, Collective self-consumption, Energy sharing*

KEY TAKEAWAYS FROM POLICY RECOMMENDATIONS

- Umbrella entities are the delivery layer that makes energy communities scalable and replicable.
- Recognise umbrella entities as eligible partners in public programmes and local initiatives.
- Provide multi-year funding for core capacity, including soft costs such as coordination and legal or technical support.
- Set up one-stop support with practical guidance and updated templates for municipalities and communities.
- Strengthen municipal implementation capacity, including procurement and project delivery support.
- Incorporate inclusion measures to ensure participation by low-income and vulnerable households.



INTRODUCTION

Across Europe, citizens, civil society organisations, local authorities and small enterprises are increasingly organising themselves into local energy initiatives to jointly produce, share and manage renewable energy. EU clean energy legislation formally recognises these initiatives as renewable energy communities (RECs) and citizen energy communities (CECs), defined in Directive (EU) 2018/2001 and Directive (EU) 2019/944, respectively, as legal entities whose primary purpose is to deliver environmental, economic or social community benefit over financial profit, and requires Member States to establish enabling frameworks for their development (European Parliament & Council of the European Union, 2018, 2019; Caramizaru & Uihlein, 2020; European Commission, 2024).

Recent reviews of EU energy communities acknowledge their potential but also note persistent legal, administrative, and financial challenges, including gaps in enabling frameworks and limited support for local groups (Energy Communities Repository, 2024; Hinsch et al., 2023; REScoop.eu & ClientEarth, 2020). These analyses emphasise the need for advisory services and organisations that offer legal, technical, and financial guidance to local initiatives and facilitate their engagement with public authorities. This brief refers to these organisations as umbrella entities. Importantly, umbrella entities should not be conflated with energy agencies or other supramunicipal structures. While energy agencies typically operate under broader public mandates, umbrella entities are often community-driven and/or privately organised to provide hands-on operational support, thereby making them more agile and more closely embedded in local territorial contexts.

This policy brief aims to provide practical recommendations on how policy and funding instruments can better recognise and support umbrella entities that strengthen local energy communities. It focuses on collaboration with local authorities, and adaptation to different territorial contexts.

The brief first sets out the context and describes the core functions of umbrella entities. It examines gaps, local collaboration and the requirements for replicating and adapting such models across various territorial settings. Finally, it presents recommendations for local authorities, energy agencies and European funding programmes.

INSTITUTIONAL DIALOGUE: ACCELERATING MEDITERRANEAN SUSTAINABILITY EFFORTS

On October 15-16, 2025, the Institutional Dialogue Project of the Green Living Areas Mission hosted its 2nd Institutional Policy Dialogue in Brussels. The event showcased successful policies with high replicability potential, including Catalonia's OECOOP cooperative model for energy communities. The Institutional Dialogue fostered exchanges around this frontrunner policy instrument, allowing for practical discussions on how to replicate such umbrella entity frameworks across the Mediterranean. The insights gathered shaped the recommendations in this brief, ensuring a practical and collaborative approach.

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CONTEXT AND PROBLEM: WHY UMBRELLA ENTITIES MATTER FOR LOCAL ENERGY COMMUNITIES

Although EU legislation requires Member States to assess barriers and establish enabling frameworks for energy communities, national implementation is still incomplete. In many countries, barrier assessments have not been systematically carried out or translated into effective policy measures. Key elements of the enabling framework, including access to information, financial tools, and capacity-building support for public authorities, are only partially developed (REScoop.eu, 2020; REScoop.eu, 2023a; REScoop.eu, 2023b).

The implementation gap continues to present significant obstacles for local actors. Energy communities and local authorities frequently encounter unclear permitting processes, changing regulations, and insufficient support schemes. Studies and policy assessments consistently identify regulatory uncertainty, bureaucratic complexity, limited technical support, and funding challenges as key barriers (Caramizaru & Uihlein, 2020; Druta et al., 2025; REScoop.eu, 2023a; REScoop.eu, 2023b).

Moreover, this implementation gap is related to other relevant aspects. A lot of innovation is still needed at various levels: business models, legal solutions, or digitisation solutions, among others. The actions and projects of local communities must be more viable (and still affordable by citizens) and make them less dependent on public aid. Different types of projects and services must be addressed, beyond collective photovoltaic self-consumption. The time factor must be considered if the role of communities is really intended to become relevant in the context of the energy transition.

These challenges are especially significant because most energy communities are started by citizens, civil society organisations, or local authorities that often lack expertise in energy regulation, cooperative governance, or project finance. Evidence from various national contexts shows that many groups are unfamiliar with available legal forms, grid connection and metering rules, administrative requirements for support schemes, and public procurement or concession rules when partnering with local authorities (REScoop.eu, 2020; REScoop.eu, 2023a; REScoop.eu, 2024). This lack of technical, legal, and administrative capacity often prevents promising initiatives from advancing beyond the idea stage or scaling up.

This context confirms earlier findings on the importance of intermediaries in grassroots energy transition, as umbrella entities now play a critical role. They build on EU guidance and the focus on one-stop shops and technical assistance facilities. These entities provide shared legal and technical support, help communities and local authorities understand their rights and obligations, and act as a bridge between public authorities and system operators (REScoop.eu, 2020; REScoop.eu, 2024). They emerged to address an



implementation gap: rights and frameworks exist, but many local actors lack the knowledge or capacity to use them. Strengthening umbrella entities is key to making energy communities workable in practice, not just in legislation.

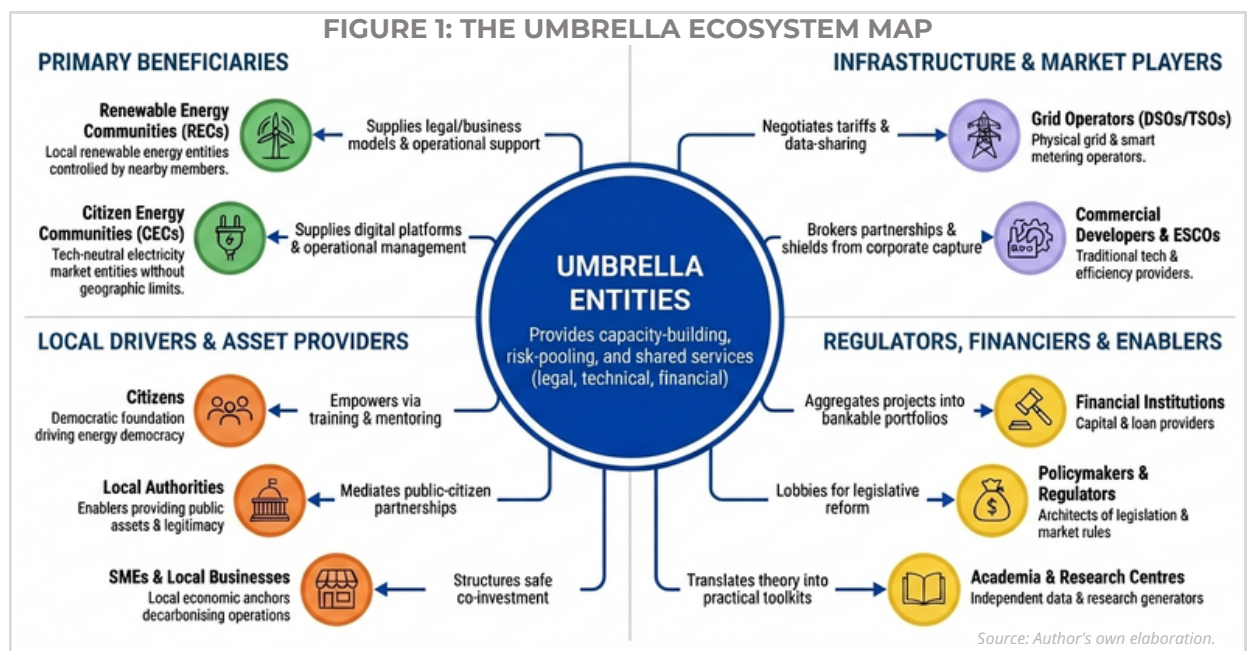
UMBRELLA ENTITIES AND THEIR CORE FUNCTIONS

Umbrella entities refer to organisations or mechanisms that provide shared support services to several local energy communities and their municipal partners. They are frequently community-driven and organised as cooperatives or non-profit entities, which strengthens trust, legitimacy and territorial embeddedness (Dudka et al., 2024), and can be managed by RECs or CECs themselves, which can increase their operational capacity and make them more agile and territorially embedded.

European Union guidance on enabling frameworks for energy communities highlights that Member States should ensure that both communities and public authorities can access technical expertise, financial tools, information, and capacity-building support. The guidance also stresses the need for dedicated support structures in providing these services (REScoop.eu and ClientEarth, 2020; REScoop.eu, 2023a; REScoop.eu, 2024).

Academic research on energy communities and local energy transitions also identifies intermediaries and support organisations as key to helping citizen-led initiatives to overcome legal, regulatory, financial, and knowledge barriers, as well as for facilitating engagement with public authorities (Caramizaru & Uihlein, 2020; Dioba et al., 2024; Druta et al., 2025).

The following ecosystem map illustrates the strategic position of umbrella entities as the





central operational hub for local energy. By providing shared capacity-building and risk-pooling services, they actively bridge the gap between primary beneficiaries (RECs and CECs), local asset providers (such as municipalities), and the broader network of market, financial, and regulatory players.

Different types of organisations and mechanisms can serve as umbrella entities for Renewable Energy Communities (RECs) and Citizen Energy Communities (CECs). For example, second-level cooperatives or federations of energy cooperatives deliver shared services to local energy communities by consolidating administrative, technical, and financial tasks that are difficult to sustain at a very small scale (Caramizaru & Uihlein, 2020; Dudka et al., 2024; Osona Energia SCCL (OECOOP), 2022).

Further, dedicated advisory platforms and cooperatives may support all stages of the REC and CEC project cycle, including concept development, design, operation, and long-term management (Newton Società Cooperativa, n.d.; Energy Communities Facility, 2024).

In some contexts, local or regional energy agencies may also provide intermediary support, such as technical assistance, training, or networking, by linking municipalities, communities, and national frameworks (AURA-EE, 2025; Energy Communities Facility, 2024). While energy agencies may contribute to similar goals, they typically have different mandates and scopes of action and should not be considered equivalent to umbrella entities.

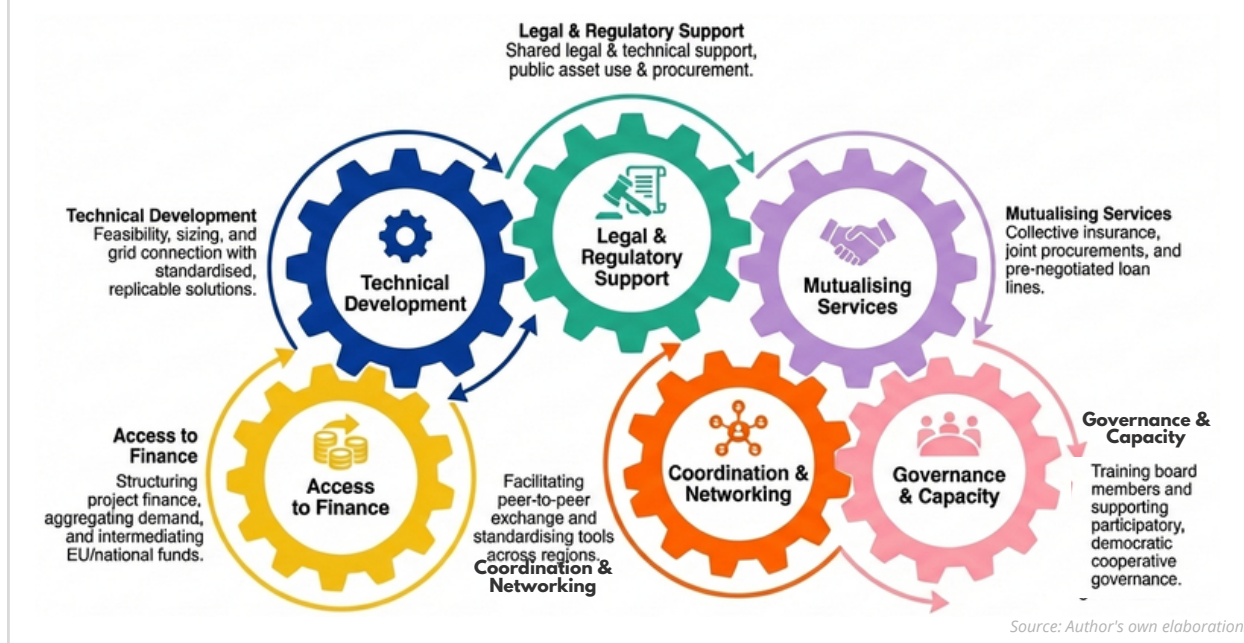
Although these organisations have different structures, they all serve a similar purpose. They aggregate knowledge, pool financial risks, and bring together expertise and services that single RECs and CECs might struggle to build on their own. By acting as a strategic interface between grassroots projects and the broader socio-technical regime, they provide a steady point of contact with local authorities and other public groups, helping to drive the much-needed clean energy transition in a more coordinated and effective way.

Within this diversity, umbrella entities support energy communities through six core functions: access to finance, technical project development, legal support, mutualised services, governance and capacity building, and coordination and networking.

Together, these functions reduce transaction costs and overcome local resource deficiencies, professionalise service delivery without compromising the democratic community logic (effectively balancing market and corporate imperatives with grassroots values), and enable local initiatives to confidently move from an initial set-up to an active implementation and replication and broader niche diffusion.



FIGURE 2: CORE FUNCTIONS OF UMBRELLA ENTITIES



Technical project development and operation: Providing or coordinating feasibility studies, sizing and design of installations, support for grid connection, and supervision of works and commissioning. Umbrella entities often develop standardised technical solutions that can be replicated across local authorities and communities, reducing transaction costs and speeding up implementation (Caramizaru & Uihlein, 2020; Dioba et al., 2024; Energy Communities Facility, 2024; AURA-EE, 2025; OECOOP, 2025).

Legal, administrative and regulatory support: Helping local actors to choose appropriate legal forms, draft statutes and internal rules, understand and comply with national and EU provisions on RECs/CECs, and address licensing, permits, metering, and energy-sharing rules. Many umbrella entities also support communities and local authorities in navigating public procurement, concession models and contractual arrangements for the use of public assets (REScoop.eu & ClientEarth, 2020; REScoop.eu, 2023a; Scharnigg & Sareen, 2023; Newton Società Cooperativa, n.d.; Osona Energia SCCL, 2022). In contexts of legal uncertainty, this interpretative role is often decisive in unlocking municipal participation.

Mutualising services: Some umbrella entities are providing mutualised services such as collective insurance policies, joint procurements, digital tools development and procurement or pre-negotiated loan lines.

Governance and capacity building: Supporting participatory governance structures (e.g.

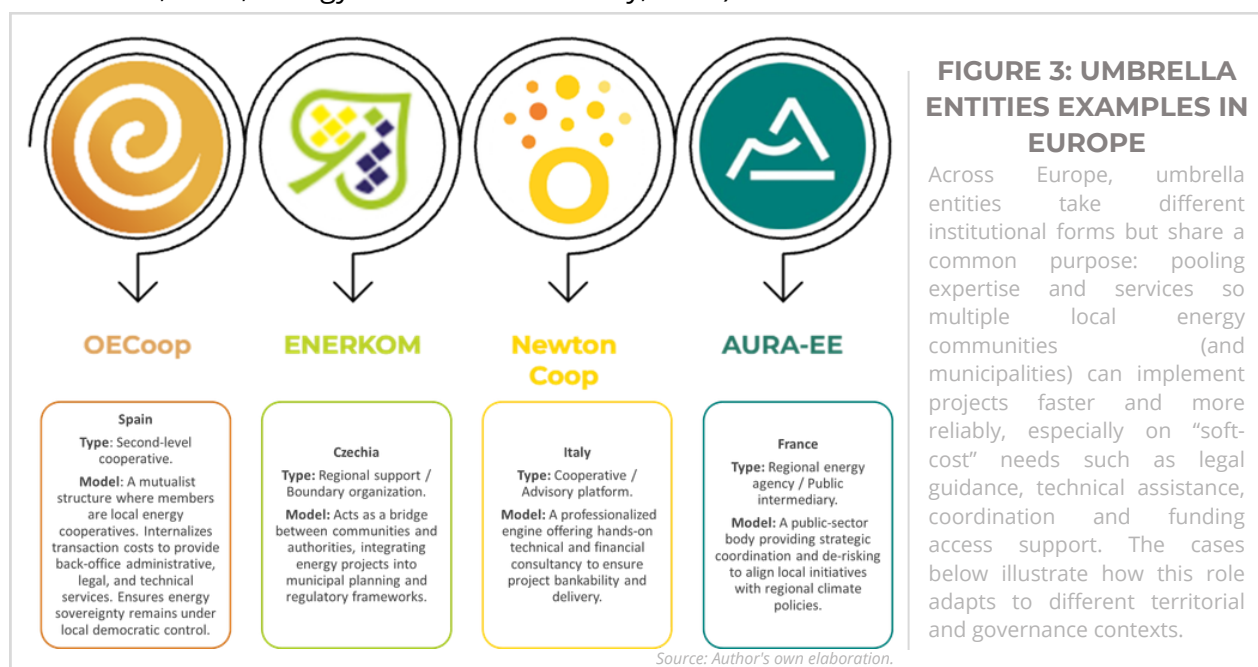


cooperative governance, one-member-one-vote), providing training for board members and local volunteers, and offering templates and guidance for internal procedures and conflict resolution. Umbrella entities have been shown to play an important role in strengthening the organisational capacity of local initiatives and ensuring democratic control as projects scale up (Caramizaru & Uihlein, 2020; Warbroek et al., 2018; Dudka et al., 2024).

International research shows that governance weaknesses, rather than technological issues, are a leading cause of failure in scaling community energy initiatives (Bauwens et al., 2022).

Coordination, networking and knowledge sharing: Acting as a hub that connects multiple communities and local authorities, facilitates peer-to-peer exchange, and disseminates good practices and standardised tools. Umbrella entities could coordinate thematic working groups, learning programmes and joint communication efforts, and represent community interests in dialogue with national authorities and other key stakeholders (REScoop.eu & ClientEarth, 2020; REScoop.eu, 2023b; AURA-EE, 2025; Scharnigg & Sareen, 2023).

Access to finance and programme intermediation: Supporting communities and local authorities to identify funding opportunities, prepare applications, and structure project finance (including cooperative shares, loans and public support schemes). Some umbrella entities aggregate demand to reach the scale needed for investment, or act as intermediaries for EU and national funds that channel support to community projects (Caramizaru & Uihlein, 2020; REScoop.eu & ClientEarth, 2020; REScoop.eu, 2023a; Schockaert, 2024; Energy Communities Facility, 2024).





LIMITATIONS, NEEDS AND CHALLENGES FOR UMBRELLA ENTITIES ACROSS DIFFERENT TERRITORIAL REALITIES

The need for umbrella entities is growing. While European Union (EU) law recognises energy communities and requires Member States to create enabling conditions, local delivery infrastructure often remains incomplete or hard to access during project development. The Renewable Energy Directive requires that barriers be addressed, and support conditions established, including access to information and finance, proportionate administrative requirements, and participation opportunities for all consumers, including low-income or vulnerable households (Directive (EU) 2018/2001). Additionally, implementation is still uneven and fragmented. As a result, local initiatives must deal with complex regulations, unclear procedures, and limited support tailored to their needs (REScoop.eu & ClientEarth, 2020; Frieden et al., 2020).

Further, academic evidence shows that many communities and their municipal partners face ongoing barriers, including complex regulations, limited funding, and insufficient capacity. These issues often prevent projects from being carried out or from advancing beyond pilot stages (Dioba et al., 2024; Hoicka et al., 2021; Caramizaru & Uihlein, 2020; Druta et al., 2025). In this context, umbrella entities serve as practical intermediaries, bringing together expertise and providing standardised support to multiple Renewable Energy Communities (RECs) and Citizen Energy Communities (CECs). Their functions align with intermediary roles described in the literature, such as translation, brokerage, and capacity-building at the local level (Hargreaves et al., 2013; Warbroek et al., 2018).

The key challenges in the replicability and adaptability of umbrella entities are:

Legal and administrative uncertainty that support measures alone cannot resolve. When regulations about collective self-consumption, energy sharing, grid connection, metering, or permitting are ambiguous or inconsistently interpreted, umbrella entities can help reduce confusion but remain vulnerable to changing interpretations by authorities and system operators (Frieden et al., 2020; REScoop.eu & ClientEarth, 2020; Hoicka et al., 2021).

Municipal engagement constraints, including limited capacity and risk management challenges. Local authorities are often expected to facilitate energy communities as partners, hosts of public infrastructure, organisers, or co-investors. However, many local governments lack enough staff, specialist knowledge, and legal certainty for sustained collaboration, especially when administrative rules are complex and funding regulations are difficult to understand (ICLEI, 2025; Caramizaru & Uihlein, 2020; Hoicka et al., 2021).

Additionally, even though Umbrella entities provide guidance, local governments' decisions depend on local interpretations of laws, procurement rules, and administrative



procedures; they cannot fill gaps in public capacity or legal clarity. If permitting offices lack resources or procurement processes are unclear, umbrella support may speed up preparation, but bottlenecks can still arise during approval or contracting (REScoop.eu, n.d.; Castanié et al., 2020).

Ongoing funding gaps for soft-costs functions such as technical assistance, legal services, and facilitation: Key functions, including legal structuring, community engagement, project aggregation, administrative coordination, and ongoing support, are often more difficult to finance than capital expenditures. As a result, umbrella entities are vulnerable to short-term, project-based funding cycles (Caramizaru & Uihlein, 2020; REScoop.eu & ClientEarth, 2020; Warbroek et al., 2018).

Further, to succeed, umbrella entities require stable funding, skilled staff, robust knowledge management systems, and sustained stakeholder engagement. Reliance on short-term grants or complex funding programmes can weaken municipal partnerships, particularly when local authorities encounter complicated application processes and limited capacity (ICLEI, 2025).

Scaling complexity and coordination challenges within umbrella entities: As umbrella entities expand geographically and support more communities, coordination costs increase, including those for governance, accountability, service quality, and stakeholder alignment. In summary, the scaling and amplification of umbrella entities increase the complexity and can generate tensions between community, market, and administrative priorities. These tensions may undermine legitimacy, governance, and operational capacity (Bauwens et al., 2022; Hargreaves et al., 2013; Warbroek et al., 2018).

Territorial diversity requires context-specific support strategies. Evidence shows that barriers and participation constraints vary across regions, involving different combinations of regulatory, financial, technical, and social challenges (Dioba et al., 2024; Druta et al., 2025). Because of this, umbrella entities should adapt their service models to local conditions rather than employ a uniform approach.

All these challenges help explain why umbrella entities are practical solutions but are hard to keep going and replicate in different places. The next section offers specific policy and funding recommendations to address the challenges listed above.

GENERAL RECOMMENDATIONS

R.1. Formally recognise umbrella entities in programmes and calls. Include them as eligible applicants or partners in technical assistance and coordination windows.

R.2. Provide multi-year support for soft-costs and core capacity. Allow operating



support for facilitation, legal and technical advice, governance, coordination and knowledge management, with milestone-based disbursement.

R.3. Establish one-stop helpdesks with standard templates. Fund regional and local points of contact aligned with umbrella entities. Publish adaptable model statutes, concession and tender templates, and grid or metering forms, updating them regularly.

R.4. Require the inclusion of vulnerable groups in funded actions. Mandate brief context notes and specific measures for low-income or vulnerable households, consistent with Renewable Energy Directive (RED) II participation provisions.

R.5. Ensure proportionate and predictable grid and permitting procedures (Frieden et al., 2020).

R.6. Support cooperative co-ownership in larger renewable projects to strengthen local acceptance.

R.7. Systematically consider the umbrella entities or second-level communities as priority interlocutors to collect the demands and feedback of the RECs and CECs both in the definition and improvement of the aid programmes to the communities and their projects, as well as their proposals for the improvement and progress of the legislation that concerns them.

R.8. Regional or national public administrations that establish registers of energy communities **must provide for the registration** of second-level cooperatives or federations of energy communities, as well.

SPECIFIC RECOMMENDATIONS

R.9. Legal and administrative uncertainty: Issue practical interpretation notes and model documents for collective self-consumption, energy sharing, grid connection, metering, and permitting, with regular updates. Fund regional and local single points of contact, integrated with umbrella entities, for case referral and resolution (REScoop.eu & ClientEarth, 2020).

R.10. Limits on municipal engagement: Provide municipal pre-procurement support. Offer micro-grants and expert coaching to help translate community-benefit objectives into tenders or concessions without legal risk.

- Provide operational kits, brief training sessions for legal and technical staff, checklists, timelines, and memo templates, with priority given to small municipalities.
 - Include administrative-reality clauses in calls. Allow timeline flexibility where third-party approvals cause delays, when preparation steps are complete.
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R.11. Funding gaps for soft-costs: Create dedicated operating support windows for soft-costs and core capacity that explicitly cover facilitation, coordination, governance, and legal or technical advisory services. Include proportional indirect costs.

- Simplify access to funding by using short forms, rolling application windows, and transparent scoring. Provide hands-on assistance to help municipalities navigate national and EU instruments.
- Public administrations implementing subsidy programmes for energy communities should consider the fact that communities receive support from umbrella entities as a merit factor.
- The calls for subsidies should be announced in sufficient time to facilitate the joint work of the second-level entities with the RECs or CECs to present more solid proposals.

R.12. Scaling and multi-actor coordination costs: Finance shared platforms and knowledge systems such as versioned template libraries, peer forums, and cross-functional support teams. Require quality assurance and governance plans for scaling.

- Support ongoing training and communities of practice for umbrella staff and community leaders, focusing on cooperative governance, procurement, and local regulation.

R.13. Territorial diversity and adaptability: Make context notes mandatory and require clear design adjustments to reflect local regulatory, social, technical, and financial conditions.

Fund comparable pilot portfolios across diverse territories using a common evaluation framework to inform iterative improvements in future calls.

CONCLUSION

Although EU legislation recognises local energy communities, a persistent implementation gap prevents consistent municipal-level action. Umbrella entities such as second-level cooperatives, federations, and dedicated platforms act as essential facilitators. By mutualising the technical, legal, and administrative services that grassroots initiatives and local authorities often lack, these entities professionalise the energy sector while maintaining democratic community values. To scale these collaborative models across different regions, policymakers should formally recognise umbrella entities as eligible programme partners and provide multi-year operational funding for core capacity and soft costs. Strengthening municipal implementation capacity and establishing integrated one-stop support services will promote a more inclusive energy transition. These steps will help realise the rights set out in EU directives and ensure the clean energy transition benefits all citizens, including low-income and vulnerable households.



PROJECT SUMMARY

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