



# Third Multi-Year Energy Programme of France (PPE 3) for 2026–2035: Fundamental Analysis, Strategic Shifts, and Macroeconomic Implications

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## Introduction: Institutional Context and Paradigmatic Shift in Energy Planning

France's national energy policy relies on a complex, multi-level system of strategic planning, the central element of which is the Multi-Year Energy Programme (Programmation pluriannuelle de l'énergie, hereafter PPE). As a fundamental component of the French Energy Code, regulated by Articles L.141-1 to L.141-6 (amended by the 2015 Energy Transition for Green Growth Act and the 2019 Energy and Climate Act), the PPE defines sectoral development trajectories, sets capacity targets, and establishes the regulatory framework governing public financial support for energy producers.<sup>1</sup>

The publication and official adoption of the Third Multi-Year Energy Programme (PPE 3), covering two successive five-year periods (2026–2030 and 2031–2035), took place on February 12 and 13, 2026.<sup>1</sup> The adoption of this document ended a period of deep political paralysis and institutional uncertainty that lasted almost three years. The new edition of the programme was originally expected to come into force by July 1, 2023, to ensure a smooth transition from previous planning cycles (PPE 1 for 2016–2023 and PPE 2 for 2019–2028).<sup>1</sup> However, the unprecedented fragmentation of France's political landscape, reflected in the change of four governments in less than two years, made legislative consensus impossible.<sup>1</sup> As a result, the government led by Prime Minister Sébastien Lecornu was forced to resort to adopting the program via a governmental decree (décret) rather than a full parliamentary vote, which generated significant legal conflicts and lawsuits.<sup>4</sup>

Conceptually, PPE 3 represents a radical break from the paradigm of the previous decade. While PPE 2 was geared toward a systematic reduction of nuclear generation's share in the national energy mix and envisioned the closure of 14 nuclear reactors, PPE 3 officially cancels this trajectory, proclaiming a massive "nuclear renaissance."<sup>4</sup> This strategic pivot is driven by heightened demands for energy sovereignty, geopolitical resilience amidst global crises, and the need to provide national industry with stable, dispatchable, and economically affordable low-carbon electricity.<sup>4</sup> At the same time, the programme locks in a highly pragmatic, albeit heavily criticized, downward adjustment of renewable energy (RES) targets, prioritizing grid dispatchability, large-scale electrification of end-use consumption, and reindustrialization.<sup>1</sup>

## Climate Strategy Architecture: Integration of SNBC 3, PPE 3, and Macroeconomic Indicators

France's energy and climate doctrine is built around three interconnected and legally binding documents: the National Low-Carbon Strategy (Stratégie Nationale Bas-Carbone, SNBC), the Multi-Year Energy Programme (PPE), and the National Climate Change Adaptation Plan (PNACC, updated on March 10, 2026).<sup>10</sup> This triad aims to ensure a coherent approach to decarbonization, synchronizing climate change mitigation and adaptation efforts across all economic sectors.<sup>10</sup> In this architecture, the SNBC sets the



long-term macroeconomic trajectory, while PPE 3 acts as the operational mechanism, translating these global goals into concrete investment, infrastructure, and production directives for the energy market over the coming decade.<sup>10</sup>

### **Targets of the National Low-Carbon Strategy (SNBC 3)**

The second version of the strategy (SNBC 2), adopted in April 2020, established the baseline for carbon budgets (strict emission limits) for the periods 2019–2023, 2024–2028, and 2029–2033.<sup>11</sup> However, the evolution of European climate legislation, particularly the adoption of the "Fit for 55" package, required a substantial increase in national ambitions. Currently in the final stages of approval (expected in spring 2026), SNBC 3 formalizes new, stricter commitments: France must reduce gross greenhouse gas emissions by at least 50% by 2030 compared to the 1990 baseline, while maintaining the goal of achieving full carbon neutrality (net-zero emissions) by 2050.<sup>11</sup> Factoring in the absorption capacity of carbon sinks (such as forests and agricultural lands), the strategy aims for a 55% reduction in net greenhouse gas emissions by 2030, fully synchronizing with pan-European directives.<sup>14</sup>

To implement this macroeconomic goal, SNBC 3 establishes differentiated sectoral targets that serve as the basis for energy transition planning under PPE 3. The table below systematizes key decarbonization parameters across major sectors of the national economy:

<b>Economic Sector</b>	<b>Share of Gross Emissions (as of 2023)</b>	<b>Emission Reduction Target by 2030 (vs. 1990)</b>	<b>Long-Term Target (by 2050)</b>	<b>Strategic Implementation Mechanisms</b>
<b>Transport Sector</b>	34% (largest emitter)	26% reduction	Near total carbon neutrality	Transition to EVs (100% of sales by 2035), 4 L/100 km standard for ICEs by 2030, infrastructure development (170k charging stations), promotion of public transport and social carsharing. <sup>4</sup>
<b>Buildings and Construction</b>	Significant (exact share varies by methodology)	60% reduction	97% reduction (full decarbonization)	Massive building renovation program (500,000 units annually), accelerated replacement of oil and gas boilers with electric heat pumps (8.8 million units installed by 2030), introduction of new environmental standards for new builds. <sup>4</sup>
<b>Industry</b>	Significant	68% reduction	97% reduction	Large-scale electrification of industrial processes, introduction of Carbon Contracts for Difference (CCfD) to minimize volatility risks, priority development of hydrogen energy. <sup>9</sup>
<b>Agriculture</b>	Significant	28% reduction (compared to 2015: -19%)	54% reduction (compared to 2015: -46%)	Development of agroecology, precision farming, minimization of nitrogen fertilizers, local bioeconomy and biogas development, dietary shifts in consumer demand. <sup>14</sup>



An important aspect of SNBC 3 is the legal bindingness of its provisions for the public sector. Any decisions regarding public funding for infrastructure or industrial projects, made since late 2017, must mandatorily account for the project's impact on greenhouse gas emissions and comply with established carbon budgets.<sup>12</sup> Furthermore, multi-year programming in the energy sector (PPE) is obliged to demonstrate strict compatibility with the guiding principles of the National Low-Carbon Strategy.<sup>12</sup>

## **Socio-Economic Rationale: "The Value of Climate Action"**

The heightened decarbonization ambitions under SNBC 3 necessitated a fundamental revision of the investment project evaluation methodology. Drawing on the Quinet Commission report developed under the auspices of France Stratégie (a government think tank), France updated the trajectory of the so-called "value of climate action" (valeur de l'action pour le climat).<sup>17</sup> This socio-economic evaluation tool serves as an indicator ensuring the country moves along the optimal decarbonization path with the lowest structural costs.<sup>17</sup>

The value of climate action should not be equated with a desired level of carbon taxation; rather, it is a benchmark used to assess the carbon impact of investment projects during public and corporate decision-making.<sup>17</sup> The more ambitious the emission reduction goal (as with the shift to a 50% target by 2030 in SNBC 3), the higher the calculated value of climate action. This mathematical model reflects the economic reality wherein decarbonized technological solutions (e.g., next-generation nuclear reactors or massive offshore wind farms) require significantly higher initial capital expenditures compared to traditional hydrocarbon-based generation.<sup>17</sup> A long-term, multi-year reference for the cost of carbon allows households and industrial corporations to plan investments, avoiding inefficient stop-and-go scenarios and minimizing financial losses associated with poor anticipation of required technological shifts.<sup>17</sup>

## **Macro-Energy Transformation: Phasing Out Fossil Fuels and the Electrification Imperative**

The central mechanism for achieving the ambitious SNBC 3 goals, detailed within PPE 3, is a radical transformation of France's final energy consumption structure. The government's strategy aims to halve the share of fossil fuels in the energy mix between 2023 and 2035.<sup>4</sup> In absolute terms, this translates to a reduction in the physical consumption volumes of hydrocarbons (oil, natural gas, and coal) from approximately 900 TWh in 2023 to a target level of around 330 TWh by 2035.<sup>10</sup> Relative to 2012 baselines, the programme mandates a 50% reduction in primary energy consumption from petroleum products by 2030 and a 70% reduction by 2035.<sup>20</sup> Simultaneously, the share of decarbonized energy in the country's final energy consumption is to be raised to 60% by 2030 and up to 70% (71% in some scenarios) by 2035.<sup>4</sup>

The successful implementation of the fossil fuel phase-out plan will allow France to reap colossal economic dividends. According to estimates by the Institute for Sustainable Development and International Relations (IDDRI), achieving the 2035 targets will yield savings of up to €200 billion on energy import bills.<sup>9</sup> The scale of these savings becomes evident when compared to 2024 data, where France's



spending on fossil fuel imports amounted to €59.3 billion.<sup>9</sup>

## **Consumption Dynamics and the Surplus of Low-Carbon Generation**

Replacing the massive volumes of displaced fossil fuels will require an unprecedented expansion of electrification across all economic segments. According to PPE 3 forecasts, the share of electricity in the overall energy mix is expected to increase by 50% over the next decade, which in absolute terms will lead to a 40% growth in total electricity consumption—from current levels to 580–618 TWh by 2035.<sup>9</sup>

The national electricity transmission system operator RTE (Réseau de Transport d'Électricité) in its latest forecast "Bilan prévisionnel 2025" models several trajectories to meet this demand. RTE's main scenarios include a "rapid decarbonization" trajectory, assuming consumption growth from 510 TWh in 2030 to 580 TWh in 2035, and a "slow decarbonization" trajectory, with growth from 470 TWh to 505 TWh in similar periods.<sup>9</sup>

Notably, in 2025–2026, France entered a unique period characterized by RTE as a "current state of abundance" of decarbonized electricity.<sup>9</sup> This phenomenon is due to the recovery of national low-carbon production potential after overcoming technical crises (in particular, corrosion issues at nuclear plants in 2022–2023) and a decline in industrial consumption during health and geopolitical shocks.<sup>9</sup> The current surplus of generating capacity is expected to persist for at least two to three years, creating a unique competitive advantage.<sup>9</sup> The resilience of the energy system to potential climate stresses (e.g., winter cold snaps) is currently assessed at an historically high level.<sup>9</sup> Having a structural generation surplus is a critical condition for ensuring national reindustrialization, as it prevents conflicts between different groups of new energy-intensive consumers—from heavy industry to digital economy infrastructure.<sup>9</sup>

## **Nuclear Renaissance: The Structural Backbone of the New Energy Doctrine**

A key distinction of PPE 3 from previous rounds of energy planning is the official recognition of nuclear energy as an absolute priority and the "structural backbone" of the French electricity mix.<sup>1</sup> Driven by the imperatives of energy independence, geopolitical autonomy, and the provision of uninterrupted baseload power at competitive prices, the French government abandoned previously declared plans to artificially shrink nuclear generation.<sup>4</sup> In the new edition of the program, the strategic goal is to maintain electricity production volumes at nuclear power plants within the range of 380 to 420 TWh per year between 2030 and 2035, representing an upward revision from previously discussed scenarios (360–400 TWh).<sup>1</sup> To secure this trajectory, PPE 3 approves a comprehensive program affecting both the existing reactor fleet and the construction of new capacities.

### **Lifespan Extension, the EPR2 Program, and Small Modular Reactors**

The foundation of the nuclear strategy until the late 2030s will remain the existing fleet of 57 reactors. PPE 3 officially authorizes the extension of their operational lifespans beyond the initial 60-year mark,



subject, of course, to strict compliance with the requirements of the National Agency for Nuclear Safety (ASN).<sup>1</sup> This measure is viewed as the most cost-effective way to preserve baseload generation during the transition period.

The backbone of the long-term fleet renewal will be a massive program to build Generation III+ (EPR2) reactors. PPE 3 confirms a firm order for the construction of six new EPR2 units, with the prospect of commissioning the first units into commercial operation as early as 2038.<sup>4</sup> Additionally, the program includes an option to build eight more reactors of this type in the future.<sup>4</sup> An important component of the strategy is also the support for innovative developments: it is expected that the construction of the first small modular reactor (SMR) of the NUWARD design will begin in France in the early 2030s.<sup>5</sup>

To ensure the nuclear renaissance is not paralyzed by raw material shortages or a lack of waste management capacity, PPE 3 pays special attention to the entire nuclear fuel cycle. The program foresees the expansion and modernization of strategic infrastructure at facilities in La Hague, Melox, and Tricastin, as well as the continuation of work on the creation of a deep geological repository for high-level radioactive waste (the Cigéo project).<sup>4</sup> The implementation of this massive industrial program is expected to create a powerful economic multiplier and lead to the creation of over 100,000 additional jobs in the nuclear sector by 2030.<sup>4</sup> Industry corporations (Framatome, EDF, Orano) and specialized associations (e.g., Gifen) have enthusiastically welcomed this plan, emphasizing that state support provides critical visibility to attract long-term investments.<sup>8</sup>

## **Financial Challenges, Support Mechanisms, and Climate Risks**

Despite strong political backing, the implementation of the nuclear component of PPE 3 is fraught with colossal economic and technological risks. The most acute problem is the escalation of capital expenditures. Even before full-scale construction work began, the estimated budget for the six EPR2 reactors program skyrocketed: the initial estimate of €51.7 billion (already considered optimistic) was revised upward and reached €72.8 billion (and by some market estimates, up to \$73 billion).<sup>5</sup>

To protect consumers from potential cost overruns and to ensure the profitability of EDF's investments, the French government has designed a complex public financing architecture. It will rely on Contract-for-Difference (CfD) mechanisms with a strict limit on the cost of produced electricity. The target price cap is set at below 100 euros per MWh (<100 EUR/MWh).<sup>22</sup> The formation of wholesale prices in the French energy market over the entire period until 2035 will remain highly sensitive to the operational efficiency and capacity factor of the nuclear fleet.<sup>22</sup>

A second critical factor threatening the stability of nuclear generation is global climate change. Heatwaves and prolonged droughts, the frequency of which is steadily increasing, impose strict environmental limitations on the use of river water to cool reactor cores. According to predictive models, by 2050 the number of forced reactor shutdowns due to climate constraints could triple or even quadruple, posing a direct threat to national energy security.<sup>5</sup> Nevertheless, despite these challenges and widespread misconceptions (51% of the population mistakenly believe that nuclear plants contribute significantly to carbon dioxide emissions), public support for nuclear energy has rebounded to 57%, creating a favorable



social backdrop for implementing PPE 3.<sup>5</sup>

## **Renewable Energy: Rationalization, Slowdown, and Sectoral Crises**

Perhaps the most controversial and widely debated aspect of PPE 3 has been the adjustment of the strategy for deploying renewable energy sources. While nuclear energy received maximum backing, targets for key RES sectors (solar and wind generation) were revised downwards compared to preliminary drafts discussed in 2023–2025.<sup>1</sup> The government justified this move by striving for a "rational," "controlled," and "territorially compatible" development of renewables, attempting to strike a balance between climate ambitions and growing local opposition.<sup>4</sup> However, industry representatives and non-governmental environmental organizations viewed this as an unjustified step backward.

The table below provides a detailed picture of the evolution of PPE 3 targets for various RES sectors:

Technology Sector	2030 Target	2035 Target	Previous Draft Targets (Draft PPE 3, 2023–2024)	Key Changes, Trends, and Industry Commentary
<b>Solar PV</b>	48 GW	55–80 GW	54–60 GW (by 2030), 75–100 GW (by 2035)	Substantial reduction in ambition. With a baseline of ~30 GW in 2025, the new target requires adding only 3.4 GW/year until 2030, significantly below the current deployment rate of 5 GW/year. The industry calls this a "red line," warning of inevitable bankruptcies and the loss of thousands of jobs. Strategic focus has shifted to urbanized surfaces (roofs, parking lots) and agrivoltaics on farmland. <sup>1</sup>
<b>Onshore Wind</b>	31 GW	35–40 GW	45 GW (by 2035)	Severe revision due to strong local opposition. Deploying new large-scale greenfield parks is no longer a priority. The strategy strictly focuses on repowering existing assets—replacing old turbines with new, more powerful units while minimizing visual landscape impact. <sup>1</sup>
<b>Offshore Wind</b>	3.6 GW <sup>20</sup>	15 GW	18 GW (by 2035)	Target reduction framed as a "calendar shift" in massive tenders (AO9 and AO10). This decision drew criticism for inconsistency with France's commitments under the North Sea Energy Cooperation, aimed at achieving 300 GW of offshore capacity in Europe by 2050. <sup>1</sup>
<b>Hydropower</b>	26.3 GW <sup>20</sup>	28.7 GW (increase of 2.8)	Comparable expectations	Includes an additional 640 MW of capacity from existing hydropower concessions. Seen as a critical tool for grid

Technology Sector	2030 Target	2035 Target	Previous Draft Targets (Draft PPE 3, 2023–2024)	Key Changes, Trends, and Industry Commentary
		GW in dam capacity)		balancing. <sup>1</sup>
<b>Biomethane</b>	50 TWh <sup>20</sup>	47–82 TWh	N/A	A crucial element of the strategy to replace imported natural gas and decarbonize heating. <sup>1</sup>
<b>Biofuels</b>	48 TWh <sup>20</sup>	70–90 TWh	N/A	Key resource for decarbonizing heavy mobility sectors (aviation, maritime transport) where electrification is technically impossible or unprofitable. <sup>1</sup>
<b>Electrolysis (Hydrogen)</b>	4.5 GW	8 GW	Significantly higher	Major downward revision of electrolysis capacities, reflecting difficulties in scaling green hydrogen projects under current market conditions. <sup>1</sup>



## Systemic Crisis in the Offshore Wind Sector

The situation in offshore wind energy merits special attention within the PPE 3 analysis. Lowering the target to 15 GW by 2035 is not coincidental; it reflects a deep systemic crisis that has hit the industry due to inflation, disrupted supply chains, and technological challenges.<sup>1</sup> In recent years, France has faced a series of major setbacks in public tenders. The most resonant was the failure of the tender for the innovative AO7 Oléron floating wind farm project in September 2025. The project collapsed due to unsolvable technical difficulties (related to unprecedented water depths) combined with highly unattractive economic conditions, notably the state setting a price cap too low to allow investors to cover capital expenditures.<sup>10</sup>

Similar destructive processes are observed in other flagship projects. German corporation RWE exited the Centre Manche 2 development consortium, leaving its partner TotalEnergies alone amid deteriorating profitability.<sup>10</sup> The situation is exacerbated by energy giant EDF initiating an unprecedented procedure to renegotiate the guaranteed strike price for the ongoing Centre Manche 1 project. EDF management argues that the originally fixed tariff of €44.9/MWh has become absolutely unprofitable due to the rapid surge in the cost of construction materials and contractor services on the global market.<sup>10</sup> Together, these facts explain the government's caution in formulating targets under PPE 3.

## Institutional Pragmatism: The 2027 Review Clause (Clause de Revoyure)

Recognizing the high degree of uncertainty regarding the pace of industrial electrification and technological development, the authors of PPE 3 introduced a fundamentally new adaptive management mechanism into the regulatory framework—the so-called "review clause" (clause de revoyure), or simplified adjustment mechanism.<sup>1</sup> Under Article 2 of the Decree, this mechanism can be activated as early as late 2027, long before the mandatory comprehensive program review scheduled for 2030.<sup>10</sup>

The review clause grants the government the legitimate right to adjust volumes and target quotas for renewable electricity capacities (to be allocated in tenders post-December 31, 2028) in either direction—both upwards and downwards.<sup>1</sup> Crucially, this adjustment will not depend on political expediency. The procedural basis of the mechanism tightly links any changes to objective technical indicators and deep analytical assessments conducted by key institutions: the sector regulator (Commission de régulation de l'énergie, CRE) and the transmission system operator (RTE).<sup>1</sup>

The grounds for revising trajectories will be three groups of factors:

1. **Demand dynamics:** Real trends in electricity consumption and the actual speed of implementing electrified solutions in the transport and industrial sectors.<sup>1</sup>
2. **Generation:** The commissioning pace of decarbonized generating capacities (including successes or delays in the nuclear life-extension program and the launch of the first EPR2 units).<sup>1</sup>
3. **Grid integration:** The development speed of decarbonized flexibility resources, including energy



storage systems, demand response, and smart grids.<sup>1</sup>

The introduction of the review clause received polarized assessments. From a public administration standpoint, it is a manifestation of supreme institutional pragmatism.<sup>1</sup> The mechanism protects public finances from long-term commitments to subsidize excess RES capacities if electricity demand does not grow at expected rates. According to CRE estimates, the total cost of supporting renewable energy sources over the next 45 years could vary massively: from generating €35 billion for the budget (in consistently high market price scenarios) to forming a net loss of €115 billion (in low wholesale price scenarios).<sup>4</sup> Shielding against the €115 billion loss scenario is a top priority for the Ministry of the Economy.

On the other hand, business representatives, investors, and the banking sector express serious concerns.<sup>1</sup> They perceive PPE 3 provisions not as guaranteed market volumes but as "indicative and adaptable ceilings."<sup>10</sup> Introducing "downward-only flexibility," where the state can roll back support at any time, generates a toxic level of uncertainty in capital markets. This will inevitably lead to higher risk premiums when financing new wind and solar projects, complicating the achievement of even the reduced program targets.<sup>10</sup>

## End-Use Electrification and New Industrial Policy

Electrification of consumption is viewed in the French energy strategy not merely as a forced decarbonization measure, but as a powerful driver of reindustrialization, restoring competitiveness in global markets, and strengthening national geopolitical sovereignty.<sup>9</sup> The current surplus of low-carbon generation and wholesale electricity prices stably hovering below €50/MWh create a unique competitive advantage for France, enabling it to attract the most energy-intensive manufacturing to its territory.<sup>9</sup>

### Industrialization: Heat Pumps and New Capacities

To capitalize on this advantage, the government formed a special parliamentary mission on industrial electrification. One of the flagship projects supported by PPE 3 is an ambitious plan to create a full-cycle heat pump manufacturing industry. The state aims to produce one million heat pumps annually on French soil.<sup>9</sup> Replacing obsolete gas and oil boilers in the residential sector with electric heat pumps provides a multiplier effect in energy efficiency: 1 MWh of electricity used to run a pump compressor can replace 2 to 3 MWh of combusted fossil fuel.<sup>9</sup> It is expected that by 2030, about 2 million new residential units will be built and fully electrified in the country, which will require an unprecedented level of standardization and the adoption of smart technologies.<sup>4</sup>

Special attention in the new industrial policy is paid to connecting large industrial clusters. According to RTE data, the portfolio of projects awaiting grid connection stands at an unprecedented 30 GW.<sup>9</sup> These are dominated by high-tech industries: data centers with a declared capacity of 4.3 GW (their consumption is projected to grow from 5 TWh in 2025 to 15 TWh by 2030), heavy industry facilities (3.4 GW, with a target consumption of up to 113 TWh per year), and electrolyzers for green hydrogen production (2.9 GW).<sup>9</sup> To accelerate the integration of these assets, the government has developed a "fast



track" procedure which, among other things, guarantees the reservation of at least 1 GW of capacity exclusively for data center investors before 2030.<sup>4</sup> To hedge price risks for heavy industry producers, the implementation of long-term power purchase agreements is envisioned, backed by risk mitigation tools (e.g., state guarantees or CCfD contracts) that protect enterprises from price fluctuations in the European Emissions Trading System.<sup>9</sup>

## **From "Energy Efficiency First" to System Flexibility**

The implementation of massive electrification plans is accompanied by a paradigmatic shift in European and French energy doctrine. For a long time, the "Energy Efficiency First" principle dominated Brussels and national ministries, lobbied by climate funds and thermal insulation manufacturers.<sup>9</sup> It was assumed that all grid and emissions issues should be resolved through deep, total building insulation. However, experts note that this principle proved too abstract and academic.<sup>9</sup> In practice, Europe failed to meet its deep renovation targets due to exorbitant costs.

In the PPE 3 era, the focus is shifting from passive insulation to active electrification and system flexibility. Resources previously directed exclusively at turning houses into "thermoses" are now being reallocated to subsidize solar panel installations and highly efficient heat pumps, yielding better decarbonization results at lower costs.<sup>9</sup>

Nevertheless, the massive introduction of intermittent RES (solar and wind) combined with the emergence of millions of new powerful consumers (EV charging stations and heat pumps) creates unprecedented strain on distribution grids during peak hours. To prevent blackouts, PPE 3 relies on the concept of "daily consumption flexibility."<sup>2</sup> According to this concept, all new EV charging stations and heat pumps installed in new (well-insulated) buildings must comply with strict regulatory standards.<sup>9</sup> This equipment must have smart control systems capable of perceiving price and technical signals from the grid operator (e.g., temporarily reducing consumption during generation deficits or, conversely, boosting consumption during hours of excess solar generation at negative market prices).<sup>9</sup> Synchronizing the technical control of millions of distributed devices with wholesale price signals is the critically important "missing brick" in the architecture of France's new energy market.<sup>9</sup>

## **Tax Reform and a New Social Contract: Challenges of the European Context**

The massive electrification of the transport and residential sectors outlined in PPE 3 cannot be achieved without creating powerful economic incentives for end consumers. Today, France faces a severe systemic obstacle: the "double taxation paradox."<sup>9</sup> The historical fiscal system results in electricity being taxed at twice the rate of alternative fossil fuels (natural gas or heating oil).<sup>9</sup> Such a value structure fundamentally contradicts the stated decarbonization goals and makes switching to electricity economically unviable for many households and businesses.

The European Commission, as part of its action plan to ensure affordable energy, has developed a series



of direct recommendations for Member States. These include: completely eliminating electricity taxes for residential households, lowering the Value Added Tax (VAT) rate on electricity, and reducing corporate electricity taxes for businesses to the legally permissible European minimum of €0.5/MWh.<sup>9</sup> Tax reform in France takes on critical urgency due to the impending introduction of the second phase of the European Emissions Trading System (EU ETS2) in 2028, which will extend carbon pricing to building heating and road transport sectors.<sup>9</sup> Without a timely reduction in base electricity tariffs, the rollout of ETS2 will trigger an explosive rise in the cost of living, highly likely catalyzing new massive social protests akin to the "Yellow Vests" movement.<sup>9</sup>

## Internationalizing the Experience: How Competitors Are Adapting Markets

When formulating its tax strategy, France is forced to look to the best practices of its economic competitors and neighbors, who have already begun radically overhauling fiscal paradigms to accelerate the energy transition.<sup>9</sup> The table below synthesizes key international cases shaping the competitive landscape for the French program:

Country	Implemented Fiscal and Tariff Adaptation Measures	Strategic Significance for Comparison
<b>Germany</b>	Implementation of an unprecedented €10–15 billion/year state support package. Introduction of the "industrial electricity price" (Industriestrompreis) concept for 2,000 energy-intensive companies using a "4x50" rule (subsidy covers 50% of consumption capped at €50/MWh provided 50% of savings are reinvested in energy efficiency). A 15–25% reduction in overall grid charges for all consumers (saving €75/year per household). Abolition of the gas storage levy and extension of the reduced electricity tax (Stromsteuer) at €0.5/MWh. <sup>9</sup>	Demonstrates aggressive protection of national industry against high prices, placing French heavy industry in tough competitive conditions that require matching or superior subsidy measures from Paris.
<b>Spain</b>	Further development and automation of the "electricity social bonus" (bono social eléctrico) mechanism. Currently, 1.6 million vulnerable households receive the subsidy (24.5% coverage of eligible population). The	Forms a benchmark model for shielding vulnerable populations from the inflationary shock of ETS2 and incentivizing poor households



<b>Country</b>	<b>Implemented Fiscal and Tariff Adaptation Measures</b>	<b>Strategic Significance for Comparison</b>
	plan aims to automate payments, expanding coverage to 5 million families. Compensatory funds (up to €487.5 million/year) are directed toward direct bill discounts.	to invest in heat pumps.
<b>Denmark</b>	Decision to adopt a record reduction in electricity taxation for 2026. Transitioning from one of the highest tax levels in the EU (previously ~€90/MWh) to the lowest legally permitted European threshold (€1/MWh). <sup>9</sup>	Proves the political viability of radically abolishing historical tax levies in favor of accelerated electrification of heating and transport.
<b>China</b>	Staggering penetration rates for new energy technologies in the heavy commercial vehicle sector. In December 2025, the market share of new energy trucks (BEV, PHEV, hydrogen) in China surpassed that of diesel vehicles, reaching 54%. Over 231,000 such vehicles were sold in a year (182% growth vs. 2024). <sup>9</sup>	Serves as a stark reminder of Europe's lag in electrifying heavy logistics, underscoring the need for accelerated rollout of commercial EV purchase subsidies and megawatt charging networks in France.

The success of electrification in France is impossible without forming a new "social contract" that guarantees every citizen the "right to electrification."<sup>9</sup> In response to this challenge, the government incorporated the preservation and expansion of several social tools into PPE 3. Specifically, the home renovation subsidy program (MaPrimeRénov') continues, and the EV "social leasing" scheme is expanded. The latter measure allows 50,000 low-income households to access modern EVs without increasing their overall monthly transport budget (since the leasing cost is offset by the elimination of expensive gasoline purchases).<sup>4</sup> Nonetheless, ecological observatories express alarm regarding the sustainable funding of these programs amidst an overall budget deficit.



## Legal Conflicts and Political Risks of Implementing PPE 3

Although the Third Multi-Year Energy Programme is a comprehensive and technologically sound document, its real-world effectiveness is threatened by deep legal and socio-political conflicts that accompanied its adoption process.

### Conflict Between the Executive and Legislative Branches

The most significant vulnerability of PPE 3 is its legal status. According to the letter of Article L100-1-A of the French Energy Code, any fundamental changes in national energy policy establishing long-term targets for emissions, RES shares, and nuclear energy development must be adopted by Parliament in the form of a full-fledged law (loi).<sup>10</sup> However, faced with stiff parliamentary obstruction and the inability to muster a majority, the executive branch undertook an unprecedented bypass maneuver. In February 2026, the government implemented PPE 3 via the issuance of a governmental decree (décret).<sup>1</sup>

The distinction between these forms of acts is critically important. A law holds supreme legal force in the hierarchy of normative acts, whereas a decree is an act of executive regulation and can be challenged and annulled administratively. This decision sparked massive legal pushback. By late March 2026, three official lawsuits had been filed with the Council of State (Conseil d'État—France's highest administrative court) demanding the annulment of the PPE 3 decree on grounds of "abuse of power" (recours pour excès de pouvoir).<sup>10</sup> Additional lawsuits could be filed right up until the statute of limitations expired in mid-April 2026.<sup>10</sup>

Since legislation sets no strict deadline for the Council of State to render a verdict, legal proceedings could drag on for many months.<sup>10</sup> This legal vacuum creates a highly negative investment climate. Investors planning multi-billion-euro projects in offshore wind or hydrogen import infrastructure have no guarantee that the foundational document determining tariffs and quotas will not be annulled by the court.

### Criticism from the Environmental Community and NGOs

The official publication of the decree provoked a sharp backlash from a consolidated front of French non-governmental organizations (NGOs), including influential alliances like Réseau Action Climat (RAC) and Greenpeace France.<sup>7</sup> Their analytical reports highlight a series of systemic flaws and contradictions in the government's course, which they believe jeopardize the very achievement of the 2030 climate goals:

1. **Ignoring the Imperative of "Energy Sobriety" (Sobriété):** Environmentalists note that compared to early drafts of the program, the final decree significantly downplays the focus on mandatory and incentivized reductions in overall physical energy consumption.<sup>7</sup> The document lacks stringent regulatory measures to cap energy-intensive sectors like aviation, Sustainable Aviation Fuel (SAF) production, or unchecked data center growth. Given that France lacks indigenous oil, gas, and uranium reserves, RAC argues that a radical reduction in energy consumption is the only genuine path to national independence and energy sovereignty.<sup>7</sup>
2. **Degradation of RES Targets:** The government's approval of slowed solar energy development



(down to a modest 3.4 GW/year from earlier planned volumes) and the de facto abandonment of large-scale new onshore wind parks are viewed by NGOs as capitulation to conservative forces and local lobby groups. The proposed volumes do not allow France to meet the pan-European target of a 44% RES share in the energy mix.<sup>7</sup>

- 3. Financial Hypocrisy and Budget Cuts:** RAC harshly criticizes the program's financial backing. Analysts argue that publishing such an ambitious electrification plan looks "purely incantatory," as it coincided with the adoption of a highly restrictive 2026 budget that slashed critical green transition funds. Notably, budgets were cut for the flagship housing renovation program "Ma Prime Rénov'", the national Green Fund (Fonds Vert), the Cycling Fund (Fonds Vélo), and financial aid envelopes for purchasing EVs.<sup>7</sup> Declaring goals without providing state funding strips the strategy of practical meaning.
- 4. The Archaic Nuclear Bet:** Greenpeace, whose activists have historically opposed France's nuclear sector, characterized the published PPE 3 as "backward, archaic, and reactionary."<sup>25</sup> Environmentalists argue that betting on the construction of expensive, continually delayed EPR2 reactors siphons colossal financial resources away from investments in decentralized, flexible, and rapidly deployable renewable capacities, putting France at a disadvantage compared to countries like Germany and Spain.

## Final Synthesis

France's Third Multi-Year Energy Programme (PPE 3), covering the strategic horizon of 2026–2035, stands as a monumental yet deeply compromised document reflecting the collision between ambitious climate imperatives and the harsh realities of global geopolitics, macroeconomic crises, and domestic political fragmentation.

The fundamental achievement of the program is its abandonment of the dogmatic paradigms of the past decade and its pivot to a pragmatic reindustrialization policy. By executing a historic reversal toward all-out support for nuclear generation, France aims to cement its unique structural advantage—a massive, dispatchable, low-carbon baseload power supply. The nuclear renaissance, combined with the accelerated electrification of end uses (via the mass adoption of heat pumps and electric vehicles), offers the country a real chance to break its crippling financial dependence on hydrocarbon imports, potentially saving up to €200 billion by 2035.

However, the risks embedded in the design of PPE 3 are no less monumental than its potential benefits. The program's implementation critically hinges on EDF's ability to rein in the skyrocketing costs of building EPR2 reactors and safeguard the existing nuclear fleet against escalating climate threats (droughts and heatwaves). The parallel lowering of wind and solar energy targets, while justified by technological hurdles and public opposition, narrows the margin for error for the power system: any delay in nuclear construction will inevitably trigger capacity deficits and soaring electricity prices.

The innovative review mechanism (the 2027 clause) demonstrates the government's desire to react flexibly to market changes, yet it generates dangerous uncertainty for investors in new RES projects. At



the same time, the entire enterprise cannot succeed without a swift, radical resolution to the double taxation of electricity. Without realigning the fiscal system with climate goals (following the examples of Denmark, Germany, and Spain), France risks inciting a profound social crisis when the EU ETS2 quota system is rolled out in 2028. Finally, the unresolved legal status of the decree, challenged before the Council of State, hangs like the Sword of Damocles over the entire French energy doctrine, demanding the country's swift return to consensual parliamentary politics. Ultimately, PPE 3 is an uncompromising wager on technological sovereignty, the outcome of which will determine France's place in Europe's new post-industrial economy.



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