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LITHUANIA'S RENEWABLE TRANSFORMATION WITHIN EU: WHEN ACCELERATION MEETS ITS LIMITS[1]

Key words: Lithuania, renewable energy, renewable energy acceleration, Law on Energy from Renewable Sources, energy trilemma, *in dubio pro futura*

Summary

This paper examines Lithuania's renewable energy transformation within the EU by taking a two-pronged approach that combines a country case study with a broader doctrinal lens. The initial segment delineates Lithuania' s energy transition trajectory and the accelerated growth of renewables. It then analyses the current status quo of "legal acceleration" for renewables in Lithuania, focusing on recent legislative amendments, including measures linked to EU directives. The second part of the paper addresses the fact that acceleration cannot be understood through legal change alone. Energy governance involves making choices between competing objectives and demands. To structure these trade-offs, the article introduces the energy trilemma as an established analytical framework and evaluates *in dubio pro futura* as a future-oriented decision rule that may assist in prioritisation under legal uncertainty. The two parts are deliberately integrated: Lithuania's experience provides empirical and legal material that reveals where acceleration meets limits, while the theoretical tools offer a coherent method for interpreting and justifying decision-making across those limits.

1. Introduction

The transition to renewable energy has become an urgent task of legal and institutional design within the European Union. However, the acceleration of renewable-energy deployment cannot be reduced to a question of legal regulation alone: it is contingent upon technical and economic conditions and must be

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pursued with due regard to energy security, cost-effectiveness, environmental sustainability and other public interests.

When examining this issue, Lithuania serves as a pertinent case study. Following the closure of the Ignalina Nuclear Power Plant, the country experienced an energy-generation gap and a high degree of import dependence. At the same time, it was pursuing energy independence, integration into the European energy system and the expansion of renewables. The resulting strategic and legislative measures, including recent amendments implementing EU requirements, highlight the need to reconcile long-term decarbonisation objectives with short-term operational constraints of the energy system.

The article examines Lithuania's recent renewable-energy transformation and the principal legal measures supporting it. It poses the question of whether the energy trilemma can provide a framework for understanding the competing objectives encountered at the limits of acceleration, and whether *in dubio pro futura* can provide a basis for evaluating the resulting legal choices in a forward-looking manner. The study employs doctrinal legal analysis to relevant Lithuanian legal and policy instruments and case law, contextualised by official energy data and secondary literature.

The analysis is divided into two parts. The first part of the article outlines Lithuania's renewable-energy trajectory, strategic objectives and recent legal developments. The second examines the limits of acceleration through the energy trilemma and *in dubio pro futura*, using the Constitutional Court's ruling on the limitation of aggregate solar-power capacity as a practical illustration. The article contends that the energy trilemma highlights competing objectives but does not address specific legal decisions. *In dubio pro futura* may complement proportionality and reason-giving by making the temporal dimension explicit and assisting in evaluating whether short-term constraints preserve a credible pathway towards long-term climate and energy objectives.

2. Accelerating Lithuania's energy transition: Context and legal developments

In recent years, Lithuania has seen a rapid increase in renewable energy deployment, reflecting the progress made in this field. Eurostat data show that renewables accounted for 35.4% of Lithuania's gross final energy consumption in 2024, which is about ten percentage points above the EU average (25.2%)[2]. Overall, Lithuania's increase since 2020 has been substantially stronger than the EU-wide trend[3].

[2] Eurostat. Share of energy from renewable sources. Eurostat, 2022. https://doi.org/10.2908/NRG_IND_REN

[3] Lithuania: 26.77% (2020), 29.60% (2022), 35.40% (2024); EU-27: 22.04% (2020), 23.00% (2022), 25.20% (2024).

In Lithuania, these results were largely driven by the share of renewable energy sources (RES), which accounted for 52.08% of final energy consumption for heating and cooling, and by the RES share in electricity, which made up 48.99% of total electricity consumption[4]. The most challenging situation remains the transport sector, where RES accounted for 8.98% of final energy consumption.

According to data from the Lithuanian Energy Agency, total electricity generation in Lithuania increased by 91.4% between 2014 and 2024, rising from 4 054 TWh to 7 761 TWh.[5] This growth was primarily driven by an increase in electricity generation from solar and wind power plants, which have become the primary sources of electricity production. In comparison with 2014, electricity generation from solar and wind power plants in 2024 increased by approximately 17-fold and fivefold, respectively.

Electricity demand in the country has remained stable in recent years, fluctuating around 12–13 TWh per year. In 2024, the amount of electricity imported to Lithuania's Power System accounted for 64.7% of the total electricity demand in the country (which was 13.2 TWh).[6] This indicates that domestic electricity generation has not yet been sufficient to fully meet national demand, implying continued reliance on electricity imports. In terms of energy import dependency, Lithuania ranked 18th in the EU in 2024, with a dependency rate that exceeded the EU average, although its overall score decreased by almost 10 points over the 10-year period.[7]

Following the shutdown of Unit 2 of the Ignalina Nuclear Power Plant on 31 December 2009 (a commitment undertaken by Lithuania's accession to the European Union), domestic nuclear electricity generation ceased and an 'energy generation vacuum' emerged. This development fundamentally reshaped both the national energy mix and Lithuania's energy security calculus. The vacuum did not remain empty: it was filled through a combination of increased reliance on imported natural gas and electricity – alongside diversification measures such as the Klaipeda LNG Terminal – and accelerated deployment of renewables, most visibly bioenergy in the heating sector. Domestic electricity production still does not meet the demand.

Although Lithuania joined the European Union in 2004, its electricity system for many years remained synchronously operated within the IPS/UPS area,

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[4] Lithuanian Energy Agency. Current RES statistics. Available: https://www.ena.lt/aktuali-aei-statistika/ [last viewed 31.01.2026].

[5] Lithuanian Energy Agency. Overview of Lithuanian energy sector data, 2024, p. 7. Available: https://www.ena.lt/uploads/2024-metines-EDA-apz/2024_metine-EDA.pdf [last viewed 31.01.2026].

[6] VKEKK. Annual Report on Electricity and Natural Gas Markets Submitted to the European Commission. Available: https://vert.lt/en/Pages/2025-07/Annual-Report-On-Electricity-And-Natural-Gas-Markets-Submitted-To-The-European-Commission.aspx?utm_source=chatgpt.com [last viewed 31.01.2026].

[7] Eurostat. Energy import dependency by products. Available: https://ec.europa.eu/eurostat/databrowser/view/sdg_07_50/default/table?lang=en&utm_source=chatgpt.com [last viewed 31.01.2026].

where system frequency control is centred in Russia.[8] This changed in February 2025, when the Baltic electricity systems were successfully synchronised with the Continental Europe Synchronous Area on 9 February 2025.[9] Essentially, the issue of energy security is particularly important for Lithuania.[10]

Lithuania has clearly defined objectives of energy independence and the development of renewable energy sources in its primary legal acts and strategic policy documents. The Lithuanian energy sector is guided by two key documents, updated in 2024. On 11 December 2024, the Government approved an update to the National Energy and Climate Plan of the Republic of Lithuania (LNECP.)[11] On 26 June 2024, the *Seimas* (Parliament) approved a new recast of Lithuania's National Energy Independence Strategy (LNEIS).[12] The LNEIS 2018 and LNEIS 2024 strategies both focused on accelerating the development of renewable energy, but the 2024 strategy also emphasised the goal of energy export. The export was planned to rely on wind energy, including offshore wind energy, as the main source and hydrogen production. However, the assessment of certain assumptions has evolved over time. The LNEIS 2024 has outlined four strategic energy objectives for Lithuania: ensuring a secure and reliable energy supply, achieving 100% climate-neutral energy for Lithuania and the region, facilitating the transition to an electricity economy, and developing a high-value-added energy industry, while ensuring energy resources are accessible to consumers. Currently, ambitions in the field of RES are being raised, and by 2030 it is planned to achieve a 55% share of RES in final energy consumption, including 100% of electricity and 90% of energy in the district heating sector.

The Law on Energy from Renewable Sources of the Republic of Lithuania (hereinafter referred to as LRES) was adopted in 2011 as the principal national legal act in the field of renewable energy. The LRES is subject to rather frequent amendments. The 2022 amendment to the LRES,[13] included in the so-called Breakthrough Package, introduced a number of provisions to facilitate the deployment of RES. The content of these amendments has been analysed

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[8] LITGRID. Baltic TSOs have sent a notice on decoupling from Russia-controlled electricity system in February 2025. Available: https://www.litgrid.eu/index.php/news-events-/news/baltic-tsos-have-sent-a-notice-on-decoupling-from-russia-controlled-electricity-system-in-february-2025/32852 [last viewed 31.01.2026].

[9] ENTSO-E confirms successful synchronization of the Continental European electricity system with the systems of the Baltic countries. Available: https://www.entsoe.eu/news/2025/02/09/entso-e-confirms-successful-synchronization-of-the-continental-european-electricity-system-with-the-systems-of-the-baltic-countries/?utm_source=chatgpt.com [last viewed 31.01.2026].

[10] Pauzaite-Kulvinskiene J., Zvaigzdiniene I., Zilinskiene L. Lithuania [online]. Wydawnictwo Uniwersytetu Slaskiego, 2025. Available: https://epublications.vu.lt/object/elaba:238839027/238839027.pdf [last viewed 15.01.2026].

[11] Lithuania's National Energy and Climate Plan. Available: https://www.e-tar.lt/portal/en/legalAct/dabeaf52b7b811ef88c08519262548c4 [last viewed 31.01.2026].

[12] Lithuania's National Energy Independence Strategy. Available: https://www.e-tar.lt/portal/lt/legalAct/TAR.E151BC09AE62/asr [last viewed 31.01.2026].

[13] Seimas of the Republic of Lithuania. Amendment no XIV-1169 to the Law on Energy from Renewable Sources of the Republic of Lithuania No. XI-1375 [online] Available: https://www.e-tar.lt/portal/lt/legalAct/86a0dea0fdf411ec8fa7d02a65c371ad [last viewed 29.10.2024].

in a separate publication.[14] On 25 June 2025, an amendment to the LRES[15] was adopted to implement the RED III Directive. It introduced provisions on the designation of renewables acceleration areas, new deadlines for the issuance of permits, and a range of other measures.

This section provides an overview of Lithuania's renewable energy legislation, policy objectives and relevant statistics, clearly demonstrating the national regulatory framework's explicit orientation towards accelerating renewable energy deployment. However, even where strategic direction is clear, the energy transition entails unavoidable trade-offs. Accordingly, the next chapter will introduce the necessary doctrinal and theoretical tools for structuring, prioritisation and supporting consistent, legally defensible decision-making.

3. Where acceleration meets its limits: The energy trilemma and *in dubio pro futura*

3.1. The energy trilemma: Balancing competing objectives at the limits

The ability to reach balanced decisions regarding the deployment of renewable energy sources is of critical importance, even within a highly developed and increasingly 'accelerated' legal framework. The expansion of renewable energy is not solely determined by regulatory frameworks; it is also influenced by the inherent physical characteristics of electricity systems and the operational constraints of power networks. Renewable energy sources (especially wind and solar) are variable and can't be transported, so production doesn't always match existing networks.[16] Although falling technology costs are enabling energy to be produced for households and communities, but infrastructure (historically designed around fossil-fuel generation), carbon lock-in effects and regulatory constraints often hinder integration.

For this reason, legal mechanisms and planning instruments must be aligned with the technical and economic realities of the energy system if they are to produce implementable outcomes rather than merely aspirational targets. Energy law scholarship has already developed an analytical tool for structuring such reality-based choices: the energy trilemma.

The energy trilemma is a concept used to describe the need to balance three competing objectives and demands when developing energy law and policy. The literature provides a range of labels for these objectives; however, for

[14] Zilinskiene L. Accelerating permit issuances for renewable energy projects. Teise. Vilniaus universiteto leidykla, Vol. 136, 2025, p. 137. https://doi.org/10.15388/Teise.2025.136.9

[15] Amendment No. XV-330 to the Law on Energy from Renewable Sources of the Republic of Lithuania No. XI-1375. Available: https://www.e-tar.lt/portal/lt/legalAct/bd0c979255c611f0b070ee7f1ceefc75 [last viewed 31.01.2026].

[16] Woolley O. Renewable Energy Law. Hart Publishing, 2023, p. 18. https://doi.org/10.5040/9781509936496

analytical clarity, I distinguish between a broader framing (economics, politics and the environment) and a more sector-specific formulation (energy security, cost-effectiveness and environmental sustainability).[17] The narrower formulation better reflects the distinctive features of the energy sector and is more workable in practice. Although the objectives of the energy trilemma are formulated in narrower terms, they remain sufficiently broad. For instance, the concept of energy security is broad,[18] which raises internal dilemmas in defining the content of security even before compromises between the three main objectives of the energy trilemma are made. The trilemma is often used to assess the wider impacts of new technologies, e.g. carbon capture and storage, but its ability to explain and justify decisions is limited in more specific cases.[19]

The utility of the energy trilemma in the context of adopting and justifying energy legislation and policy decisions is constrained, yet there is an objective necessity to enhance decision-making methodologies.

3.2 *In dubio pro futura*: A doctrinal orientation for decisions where acceleration meets its limits

The energy trilemma could be complemented by a decision-making method (or principle) of *in dubio pro futura*. A more extensive account of *in dubio pro futura* is provided in the author's earlier work.[20] Evaluating in dubio pro futura as a decision-making principle is both timely and warranted because it is not yet normatively established, yet it has begun to gain traction in recent academic debate and judicial professional discourse, suggesting growing practical relevance. For instance, the Environmental Law Working Group of the European Association of Judges of Administrative Courts held a seminar in Nancy in 2023 on the topic of "*In dubio pro futuro*: Protection of Future Generations in Public Law", which employed the concept of *in dubio pro futura*.[21]

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[17] Zilinskiene L. Renewable Energy Deployment Dilemmas: An Approach to Addressing the Energy Trilemma? Bratislava Law Review, Vol. 9, No. 1, 2025, pp. 182–183. https://doi.org/10.46282/blr.2025.9.1.962

[18] Ibid., p. 183.

[19] Fleming R. The 'Trias': A New Methodology for Energy Law. European Energy and Environmental Law Review, Vol. 28, Issue 5, 2019. https://doi.org/10.54648/EELR2019018

[20] Renewable energy: decision-making at the intersection of climate and energy law [Atsinaujinanciu istekliu energetika: sprendimu priemimas klimato ir energetikos teises sankirtoje]. Available: https://www.15min.lt/verslas/naujiena/energetika/atsinaujinanciu-istekliu-energetika-sprendimu-priemimas-klimato-ir-energetikos-teises-sankirtoje-664-2611436 [last viewed 31.01.2026].

[21] Nancy 2023. AEAJ. The Association of European Administrative Judges. Available: https://europeanlawinstitute.eu/fileadmin/user_upload/p_eli/Projects/Climate_Justice/2023-10-03-72-WG_Environmental_Law_Agenda_workshop_in_Nancy_September_2023.pdf [last viewed 31.01.2026].

In academic discourse, the notion of *in dubio pro futura* has been proposed by C. Bublitz and C. Winter[22] as a novel legal decision rule. The main idea here is, as follows: "in the face of legal indeterminacy, when the law does not provide a single correct answer but a range of several acceptable answers, courts should choose the one most favourable to the future of humanity"[23]. The rule is intended to broaden judicial reasoning to include the interests of future generations.

The Latin term *in dubio* is translated into English as "in doubt", i.e. having doubts or of doubtful or uncertain character.[24] C. Bublitz and C. Winter borrowed the term *in dubio* from *in dubio pro reo*, according to which courts must rule in favour of defendants if the facts of the case remain doubtful.[25] It is this author's opinion that the *in dubio pro futura* principle is also related to the environmental protection principle of *in dubio pro natura*. This principle is rooted in the constitutional right to a clean environment, where harmlessness is a prerequisite for the utilisation of any technology with the potential to adversely impact the environment.[26] Nevertheless, the principle of in dubio pro natura is not widely employed or universally recognised by other environmental law scholars. The principle of in dubio pro natura suggests that energy law can be brought closer to environmental law.

The notion of *in dubio pro futura* holds particular appeal and relevance in the context of legal deliberation, as it promotes a forward-thinking approach to legal decision-making. When faced with uncertainty, this concept guides decisions towards outcomes that are not only beneficial in the present but also contribute to the long-term well-being of society.

The author contends that this principle should be applied not only to intergenerational justice, but also to a common long-term perspective. This approach has the potential to facilitate the reconciliation of the frequently incompatible objectives of climate and energy law with the practical constraints inherent in their implementation. In the context of a long-term perspective on the large-scale deployment of renewable energy, its implementation may be constrained by significant and unavoidable short-term requirements.

However, formulating *in dubio pro futura* principle would go beyond the intersection of climate and energy law and extend to a future-oriented consistency requirement across sectoral objectives (e.g., food security, housing, defence). It should be taken into account that many public investments in infrastructure, education and technology are inherently future-facing. The principle

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[22] Bublitz C., Winter C. In Dubio Pro Futura. Verfassungsblog. Verfassungsblog, 2022. https://doi.org/10.17176/20220819-181947-0

[23] Ibid.

[24] Fellmeth A. X., Horwitz M. Guide to Latin in International Law [online]. Oxford; New York: Oxford University Press, Inc., 2009, p. 125. Available: http://ebookcentral.proquest.com/lib/viluniv-ebooks/detail.action?docID=3053797 [last viewed 21.01.2026].

[25] Bublitz C., Winter C. 2022.

[26] de Sadeleer N. Environmental Principles: From Political Slogans to Legal Rules. Oxford: Oxford University Press, 2020, p. 5.

would seek to prevent short-term choices from shifting disproportionate burdens onto future generations, for example by leaving an overexploited environment, and would encourage decisions that are conducive to achieving long-term objectives.

In dubio pro futura is not expressly formulated in Lithuanian law. However, this does not mean that courts do not assess the long-term and short-term consequences of legislative acts when making decisions. One such example is the constitutional case of the Republic of Lithuania regarding the limitation of the total installed capacity of solar power plants to 2 GW (provisions of Article 13(10) of the LRES)[27]. In its ruling of 7 November 2023, the Constitutional Court did not find this restriction to be unlawful per se (unconstitutionality was found due to the failure to regulate the procedures initiated). The Constitutional Court's ruling identified the positive benefits of renewable energy development for the long-term goal of mitigating climate change. The Constitutional Court stated that the development of electricity production from renewable energy sources helps to reduce the use of fossil fuels and the environmental pollution caused by them, as well as increasing the state's energy independence (reducing dependence on energy imports), and thus helps to ensure the public interest. Recognition of such a long-term goal should imply that restrictions should not be justified. However, the Constitutional Court justified such a restriction and its motivation is linked to the achievement of energy law objectives, in particular the objective of energy security as "the aim had been to ensure the reliable and safe functioning of electricity networks and the uninterrupted supply of electricity". These aspects, due to the broad concept of energy security, can also be interpreted as different dimensions of energy security.[28] The restriction on the development of new solar power plants was assessed as a temporary measure. This is probably one of the reasons why the court did not find the restriction itself to be contrary to the Constitution.

This case shows how important the time dimension is – the coordination of short-term and long-term goals, the temporary nature of measures – when making decisions that shape the foundations of the energy system. The *in dubio pro futura* approach could encourage a particularly careful assessment of whether restrictions on the development of renewable energy sources are really necessary and proportionate. It is important to distinguish whether the reasons for the restrictions are truly short-term (e.g., related to the current state of the networks) and, at the same time, to assess the prospects, timelines, and alternatives for network modernization. After all, most networks were built a long time ago and were not really designed to integrate intensive, decentralized, and intermittent renewable energy production.

The *in dubio pro futura* approach can support sustainability and long-term objectives if operationalised within existing legal tests. A practical "future-consistency" test would require decision-makers to show that (a) a short-term

[27] On the limitation on the total installed capacity of solar power plants [online]. 2023 Available: https://lrkt.lt/en/court-acts/search/170/ta2952/summary [last viewed 29.10.2024].

[28] Zilinskiene L. 2025, pp. 187–188.

measure does not foreclose the relevant long-term objective; (b) reversibility is preserved (sunset clause, review duty, or objective trigger linked to system upgrades); and (c) a credible pathway exists to remove the constraint once the bottleneck is addressed. Applied in this manner, the approach can help align climate and energy-law objectives and avoid unnecessary constraints on renewable deployment.

Conclusions

Lithuania has achieved particularly rapid growth in renewable energy, and its strategic goals and regulatory framework demonstrate a clear commitment to integration. At the same time, the Constitutional Court's case law shows that this policy direction is not absolute: it upheld limitations on the aggregate capacity of solar power plants, recognising that departures from long-term renewable deployment targets may be justified.

The energy trilemma describes the need to balance three competing objectives when developing energy law and policy. Its utility for adopting and justifying energy legislation and policy decisions is limited, which underscores the need to strengthen decision-making methodologies. Rather than remaining purely theoretical, *in dubio pro futura* can be framed as an emerging doctrinal orientation that complements proportionality and reason-giving by making the time dimension explicit and testing whether short-term constraints preserve a credible pathway to long-term transition goals. From a renewable energy perspective, applying *in dubio pro futura* could better align energy and climate law objectives and help remove unnecessary constraints on renewable energy development.

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