Consultation on the Review of Directive 2012/27/EU on Energy Efficiency

Fields marked with * are mandatory.

Introduction

This consultation is launched to collect views and suggestions from different stakeholders and citizens in view of the review of Directive 2012/27/EU on energy efficiency (Energy Efficiency Directive or EED), foreseen for the second half of 2016.

This review plays a prominent role as the Commission called on Member States to treat energy efficiency as an energy source in its own right in its Energy Union Strategy of 25 February 2015.

The European Council of October 2014 agreed on an EU objective of saving at least 27% of energy by 2030 compared to projections and requested the Commission to review the target by 2020 “having in mind an EU level of 30%”. The existing policy framework should therefore be updated to reflect the new EU energy efficiency target for 2030 and to align it with the overall 2030 Framework for Climate and Energy.

Energy efficiency policies have been put in place by the EU for some time now and they have delivered tangible results. The Energy Efficiency Directive, Energy Performance of Buildings Directive, Energy Labelling Directive and EcoDesign Directive are the key building blocks of the current energy efficiency framework. Many climate policies, such as the CO2 performance standards for passenger cars and light commercial vehicles, also make a major contribution to improving energy efficiency. Thanks to these instruments, significant progress has been achieved by Member States in terms of energy savings over the past (five) years, contributing to the overall 2020 energy and climate policy objectives.

Public funding has played an important role by supporting the implementation of energy efficiency policies at national and regional level. There has been an increase in financing over the last years

due to greater importance of these polices in the context of the overall EU decarbonisation agenda. The European Structural and Investments Funds (ESIF) and the European Fund for Strategic Investments (EFSI) are key to unlocking the needed private investments for energy efficiency. On the other hand, the effectiveness and impact of energy efficiency investment funding strongly depends (inter alia) on the implementation of the energy efficiency legislation, including the Energy Efficiency Directive.

Many measures taken by Member States today will, in fact, continue contributing to the energy efficiency targets and to the broader energy and climate policy framework beyond 2020. Since the Energy Efficiency Action Plan was adopted in 2011, the situation has greatly improved: primary energy consumption has continued to fall across the Union, with steady economic growth, and many Member States have successfully strengthened their national energy efficiency programmes.

In line with the requirement of the EED (Article 3(2)), an assessment was carried out by the Commission in 2014 to review progress towards the EU 20% energy efficiency target for 2020, the findings of which were presented in the Energy Efficiency Communication, adopted on 23 July 2014. An updated analysis of how Member States are achieving the 20% 2020 target on energy efficiency will be published as part of the State of the Energy Union package in November 2015.

Given the recent implementation date of the EED, this consultation focuses on examining the following elements of Directive:

Article 1 (subject matter and scope) and Article 3 (energy efficiency target): As required by the European Council of October 2014, which agreed the EU objective of saving at least 27% of energy by 2030 compared to projections and requested the Commission to review the target by 2020 “having in mind [a level of savings of] 30%”.

Article 6 (purchasing by public bodies of energy efficient buildings, goods and services): As required by the reporting obligation under Article 24(8) to review the effectiveness of implementation of Article 6.

Article 7 (energy efficiency obligation schemes): As required by the reporting obligation under Article 24(9) on the implementation of Article 7 and the need to address the obligation period that will expire after 2020.

Articles 9 – 11 (metering, billing information and cost of access to metering and billing information): Consumer related aspects touched upon in these Articles are also addressed in the Internal Market Design/Delivering a New Deal for Energy Consumers initiative launched in parallel.

Article 20 (energy efficiency national fund, financing and technical support): The European Fund for Strategic Investments (Junker Plan) raises the importance to address the market gaps for energy efficiency investments.

Article 24 (reporting and monitoring and review of implementation): Given the new governance system to be introduced under the Energy Union in view of 2030 framework, currently being prepared in parallel to this exercise.

The questions of this consultation on the above articles are formulated so as to respect the requirements of the recently adopted Better Regulation Package and to ensure that the results of this consultation are fed into two parallel processes: first, to assess whether relevant measures are efficient, effective, and coherent with the broader EU legislative framework, and second, to identify the most appropriate policy options to be considered for reviewing specific aspects of the EED as part of the impact assessment.

Against this background, questions of a general nature for the general public are included in Part I. A set of questions of a technical nature for a more expert public is included in Part II. Respondents are invited to reply within the two parts to all the questions they consider relevant.

Information about the respondent

* **Are you answering on behalf of an organisation or institution?**

- (●) Yes, I am answering on behalf of an organisation or institution
- ( ) No, I am answering as an individual

* **Please enter the full name of your organisation or institution:**

100 character(s) maximum

European Association of electrical contractors

* **Please enter your full name and position title:**

100 character(s) maximum

Evelyne Schellekens Secretary General

* **Please enter your email address:**

eschellekens@aie.eu

* **Please specify which category best describes your organisation or institution from the list below:**

- ( ) Central public authority
- ( ) Local public authority
- ( ) Private company
- ( ) Utility
- ( ) International organisation
- ( ) Workers organisation/association/trade union
- ( ) Non-governmental organisation (NGO)
- (●) Industry/business association
- ( ) Other interest group organisation/association
- ( ) Consultancy
- ( ) University
- ( ) Think Tank/research institute
- ( ) Political party/organization
- ( ) Other

* **Does your organisation or institution primarily deal with energy issues?**

- (●) Yes
- ( ) No

* **Please indicate your principal country or countries of residence or activity:**

- ( ) Austria
- (●) Belgium
- ( ) Bulgaria
- ( ) Croatia
- ( ) Cyprus
- ( ) Czech Republic
- ( ) Denmark
- ( ) Estonia
- ( ) Finland
- ( ) France
- ( ) Germany
- ( ) Greece
- ( ) Hungary
- ( ) Ireland
- ( ) Italy
- ( ) Latvia
- ( ) Lithuania
- ( ) Luxembourg
- ( ) Malta
- ( ) Netherlands
- ( ) Poland
- ( ) Portugal
- ( ) Romania
- ( ) Slovakia
- ( ) Slovenia
- ( ) Spain
- ( ) Sweden
- ( ) United Kingdom
- ( ) Other

* **How would you prefer your contribution to be published on the Commission website, if at all?**

- (●) Under the name indicated (I consent to publication of all information in my contribution and I declare that none of it is under copyright restrictions that prevent publication)
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Part I – General questions

1. Article 1: Subject matter and scope and Article 3: Energy efficiency target

Article 1 provides the general framework for the promotion of energy efficiency within the Union in order to ensure the achievement of the EU 20% energy efficiency headline target by 2020. In addition and more specifically, **Article 3** requires that each Member State sets an indicative national energy efficiency target based on either primary or final energy consumption, primary or final energy savings or energy intensity. In setting the targets, Member States should take into account a number of provisions set out in Article 3(1).

As regards the EU energy efficiency target for 2030, the European Council agreed in October 2014 on an indicative target at the EU level of at least 27% (compared to projections) to be reviewed by 2020 having in mind an EU level of 30%. Therefore, the existing policy framework should be updated to reflect the new EU energy efficiency target for 2030 and to align it with the overall 2030 Climate and Energy framework.

1.1. What is the key contribution of the EED to the achievement of the 2020 energy efficiency target?

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The EED is the main EU legislation on energy efficiency. Its biggest contribution is that it does not only focus on product design, but it sets measurable targets for the EU as a whole in every economical sector, that are then adapted by each Member State at national level.The fact it applies horizontally and not just specifically to one usage makes it more efficient.

However, the EED has not been enough to reach the 20% energy efficiency target by 2020 and the revised legislation should be ambitious enough to counterbalance this delay and reach the 2030 target. Article 1 of the EED explains its targets are minimum requirements and Member States are free to implement more ambitious measures. But facts show they only stick to the minimum requirements, making their ambition even more important. The implementation of the Directive by Member States should be monitored by the Commission and be sanctioned if not properly applied.

1.2. How has the EED worked together with the Effort Sharing Decision, other energy efficiency legislation (on buildings, products and transport) and ETS? Could you describe positive synergies or overlaps?

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The EED has been a key tool for energy efficiency promotion in the EU, but has failed to reach the 2020 energy efficiency goal. Energy efficiency suffers from multiple legislative acts that make it harder to set a forward looking, ambitious and coordinated policy
The revision of EED should be coordinated with the revision of EPBD and be strict on use of fossil fuel combustion at the end user side. The future directive must avoid today’s discrimination of the use of electricity in

various EU legislations because of the introduction of a primary energy conversion factor (PEF) for electricity. This discriminates electrical products and systems, compared to fossil fuel products and systems. Indeed electrical products have to use 60% less energy than alternative products. In some cases, this has resulted in electrical products being prohibited. We strongly call for the revised EED to focus on final energy use, and also promote emission free energy carriers at end-user side like electricity

1.3. How has the EED worked together with existing national legislation? Could you describe any positive synergies or overlaps?

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The EED has been the first step towards implementing efficiency policies at the national level. It has forced Member States to introduce national legislation on energy efficiency, which is a very good thing. Prior to its adoption, there were very little, if any, energy efficiency policies applied locally in Member States. It has thus been a very efficient first step to give a momentum

1.4. What are the main lessons learned from the implementation of the EED?

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Strict control over national transposition of the EED is crucial, the implementation being still incomplete in many Member States. The Commission should also verify the application of the measures included in MS strategies and NEEAPs. For example:
French obligation to renovate commercial buildings by 2020 appears in the national strategy but has never been applied
France explains it meets the article 5 obligation of a 3% renovation rate of State buildings. But the obligation is met only because the overall surface of the State building stock is reduced, not because it was renovated.
The revised text should provide a framework for periodical and regular reviews of the proper implementation of the EED and on the progress made on the path to the 2030 target and not only be based on Member States declarations.
The EU should have in mind that the majority of Member States will not go beyond the European legislation. Ambitious targets need to be set to meet its goals.

1.5. Which factors should the Commission have in mind in reviewing the EU energy efficiency target for 2030?

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The EU should take into account that the 2020 energy efficiency target will not be met. It is crucial to go way further in order not to fail again and meet the 2030 target set at 27%, but which could possibly be revised at 30%.

The calculation method to evaluate these objectives is also unclear. Member States are free to communicate the energy savings expressed in a different way

and the data they wish to share, but there is no clear definition and common EU definition of what should be included in this estimation and what unit should be considered.

1.6. What should the role of the EU be in view of achieving the new EU energy efficiency target for 2030?

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The EU should have in mind when reviewing the EED that the majority of Member States will not go beyond the European legislation. It should therefore set ambitious enough targets and measures to meet its goals. If the target remains voluntarily, Member States won't do anything.

1.7. What is the best way of expressing the new EU energy efficiency target for 2030:

- ○ Expressed as energy intensity
- ○ Expressed in an absolute amount of final energy savings
- ○ Expressed in both primary and final energy consumption in 2030
- ○ Expressed only in primary energy consumption in 2030
- ○ Expressed only in final energy consumption in 2030
- ◉ Other

Please specify 'Other':

100 character(s) maximum

Expressed only in final energy intensity

1.8. For the purposes of the target, should energy consumption be:

- ◉ Expressed as energy, regardless of its source (as now)
- ○ Expressed as avoided non-renewable energy
- ○ Expressed as avoided fuel-use (but including biomass)
- ○ Other

2. Article 6: Purchasing by public bodies of energy efficient buildings, goods and services

One of the objectives of the EED is to improve and strengthen energy efficiency through public procurement. **Article 6** of the Directive states that Member States shall ensure that central governments purchase only products, services and buildings with a high energy-efficiency performance. The central governments of the Member States should "lead by example" so that local and regional procurement bodies also strengthen energy efficiency in their public procurement procedures.

The Commission is carrying out an assessment of Article 6 of the EED and the preliminary findings show a rather limited experience in the Member States so far in implementing the requirements of

Article 6. One of the main barriers to implementing the requirements is the lack of clarity and guidance across the existing EU rules on public procurement. On the other hand, experiences in some Member States indeed demonstrate that the measures required by the EED on public procurement have helped to educate and involve procurement bodies in the use of energy efficiency criteria, spreading the exemplary role of central governments also at regional and local levels.

2.1. In your view, are the existing EU energy efficiency requirements for public procurement sufficient to achieve the needed impact of energy savings?

- ○ Yes
- ◉ No
- ○ No opinion

Please explain your answer:

1000 character(s) maximum

No.

- The EU energy efficiency requirements for public procurement are mandatory for central government bodies only. It should be made mandatory to all public bodies, including at regional and local levels. A very important part of the public investments in Europe are made by local authorities, it is thus crucial these requirements apply to them;
- The Commission should also consider reviewing and levelling-down the thresholds mentioned in article 7 of Directive 2004/18/EC when the contracts aim at improving energy efficiency. Many of those contracts are below those thresholds.
- It is crucial to clarify the penalties when the obligations in the legislation are not apply. It is very easy not to apply the legal obligations today by referring to “cost-effectiveness” or “technical suitability”.

2.2. How could public procurement procedures be improved in the future with regard to high energy efficiency performance?

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It is crucial to clarify the safeguards specifying when the obligation does not apply. It is very easy not to apply this obligation today by referring to “cost-effectiveness” or “technical suitability”.

Public procurement should also consider the life cycle of the products and services costs, and not only the purchase costs. Such an approach would help make energy efficient technologies, with a market price higher but which also bring long term economies, more affordable. This would help boost their development.

2.3. Do you think that there is sufficient guidance in your country to characterise "energy efficient products, services and buildings"?

- ○ Yes

- (●) No
- ( ) No opinion

Please explain your answer:

1000 character(s) maximum

Energy efficient products are easy to identify. But it is not the case for services and buildings, especially because the definition varies from a country to another, or from one appliance to another.However it is much easier to define an energy efficient building: it should refer to NZEBs for renovation, and positive-energy buildings for new buildings.
The future directive must avoid today's discrimination of the use of electricity in various EU legislations because of the introduction of a primary energy conversion factor (PEF) for electricity. This discriminates electrical products and systems, compared to fossil fuel products and systems. Indeed electrical products have to use 60% less energy than alternative products. In some cases, this has resulted in electrical products being prohibited.
The UK has an Enhanced Capital Allowance scheme where capital allowances are covered in the first year for installing energy efficient equipment which is listed on an 'Energy Technology List'

2.4. Have you seen information campaigns or other public initiatives in your or in another EU country that explain public procurement of energy efficient products, services and buildings?

- ( ) Yes
- (●) No

3. Article 7: Energy efficiency obligation schemes

Article 7 together with Annex V requires that Member States set up an energy efficiency obligation scheme to ensure that obligated parties (energy distributors and/or retail energy sales companies that are designated by each Member State) achieve a given amount of energy savings (1.5% annually) from annual energy sales to final customers over the period 2014 to 2020. As an alternative to setting up an energy efficiency obligation scheme, Member States may opt to take other policy measures to achieve energy savings among final customers to reach the same amount of savings.

The Commission is required to assess the implementation of this Article and submit a report by 30 June 2016 to the European Parliament and the Council, and, if appropriate, to supplement the report with a legislative proposal for amendments.

In line with the EED, Member States had to notify the measures and methodologies on implementation of Article 7 by 5 December 2013. Further information from Member States was received in the notified National Energy Efficiency Action Plans (due by April 2014).

According to the latest available information from the notifications received from Member States, 16 Member States notified an energy efficiency obligation scheme by putting an obligation on utilities to reach the required cumulative energy savings by 2020 under Article 7. Four Member States out of these (Bulgaria, Denmark, Luxembourg and Poland) will use it as the only instrument to achieve the required energy savings. 12 Member States (Austria, Croatia, Estonia, France, Ireland, Italy, Latvia,

Lithuania, Malta, Slovenia, Spain and United Kingdom) will use the obligation scheme in combination with alternative measures. On the other hand, 12 Member States (Belgium, Cyprus, Czech Republic, Germany, Greece, Finland, Hungary, Netherlands, Portugal, Romania, Slovakia and Sweden) have opted to only use the alternative measures to reach the required savings instead of putting obligations on utilities.

3.1. Are you aware of any energy efficiency measures that have been carried out or are planned in your country, by the utilities or third parties in response to an energy efficiency obligation scheme?

- ○ Yes
- ○ No
- ○ No opinion

Please explain your answer:

1000 character(s) maximum

FRANCE
Yes. In France an energy efficiency obligation scheme has been set up in 2006 and has proved successful. It entered a new phase in 2015, but its targets have almost been met already, even though this new phase should only end in 2018. This highlights the need to strengthen the 1.5% energy savings target.

UK
The ECO scheme, Energy Company Obligation Scheme, forces companies to pay for the installation of energy savings measures on buildings that it would not be economic to do so or for social housing.

3.2. In your view, is Article 7 (energy efficiency obligation scheme or alternative measures) an effective instrument to achieve final energy savings?

- ◉ Yes
- ○ No

Please explain your answer:

1000 character(s) maximum

The AIE supports to have energy saving obligation or equivalent schemes as long as they are based on principles of open, transparent and free competition and a safeguarded level playing field for all market players.
Utility Companies are clearly likely to have a role to play, but there should be a clear distinction between the commercial entity and any part of their organization participating in the pursuit of energy use reduction.The major threat we believe for the vast community of smaller and locally based contractors companies is the development of the energy saving market being controlled by the Utilities. Giving access to the meter data should be the consumer's property/decision.

The role of the electrical engineering contracting companies as energy

advisers and energy service providers should be recognised as having a significant contribution to make in achieving best value for clients especially in providing cost-effective design solutions that best meet clients' needs.

3.3. What are, in your view, the main challenges or barriers to implementing Article 7 effectively and efficiently in your country? Please select up to 5 options from the list.

at most 5 choice(s)

- [ ] To select or introduce the right set of measures for achieving 1.5% energy savings (annually)
- [x] Too great flexibility to use wide range of measures: energy efficiency obligation scheme and alternative measures
- [x] Strong opposition from energy suppliers and distributors to set up an energy efficiency obligation scheme
- [x] Lack of effective enforcement
- [ ] Lack of sufficient knowledge and skills of involved parties
- [ ] Lack of awareness (by the end-users) of the energy efficiency obligation schemes or alternative measures
- [ ] Developing the calculation methodology in line with the requirements of Annex V
- [ ] Ensuring sound and independent monitoring and verification of energy savings
- [ ] Avoiding double counting
- [x] High administrative burden
- [ ] Ensuring consistent application of the requirements with other energy efficiency legislation (e.g. building codes)
- [x] Limited timeframe (2014-2020) that makes it hard to attract investment for long term measures
- [ ] Other

3.4. Do you believe that the current 1.5% level of energy savings per year from final energy sales is adequate?

- ( ) Strongly agree
- ( ) Agree
- (•) Disagree
- ( ) Strongly disagree
- ( ) No opinion

Please explain your answer:

1000 character(s) maximum

The Commission should review the 1.5% energy savings target that is not ambitious enough and not in line with its 2030 climate goals and the recent COP21 Paris climate agreement. Article 7 gives the possibility to Member States to use a value of 1% in 2014, increased of 0.25% each year to reach 1.5% in 2018. The same increase could be made mandatory EU wide after 2018 using values of: 1.75% in 2019; 2% in 2020; 2.25% in 2021 and 2.5% in 2022.

3.5. Should energy efficiency obligation schemes have specific rules about energy savings amongst vulnerable consumers?

- (●) Yes
- ( ) No
- ( ) No opinion

Please explain your answer:

1000 character(s) maximum

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Yes. This needs to be done to ensure fair distribution of finance to those
most in need.
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4. Articles 9-11: Metering, billing information and cost of access to metering and billing information

Articles 9-11 deal with consumer empowerment, by asking Member States to put in place requirements about metering, access to billing information and cost of access to metering and billing information, allowing consumers to make decisions about their energy consumption. These issues are also currently being looked at within the Electricity Market Design/Delivering a New Deal for Energy Consumers initiative. It may be relevant to consider certain aspects of these Articles in the EED review. The same is true for the subject of "demand response" (as set out in paragraph 8 of Article 15, but on this topic explicit questions were already included in the Market Design consultative communication published in July 2015).

4.1. Overall adequacy: Do you think the EED provisions on metering and billing (Articles 9-11) are sufficient to guarantee all consumers easily accessible, sufficiently frequent, detailed and understandable information on their own consumption of energy (electricity, gas, heating, cooling, hot water)?

- ( ) Yes
- (●) No
- ( ) No opinion

Please explain your answer:

1000 character(s) maximum

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No. Consumers should also have access to live information (and not just past
data) on their current consumption, expressed in Kilowatt hour, and in euros.

The implementation and change of (smart) meters in some Member States such as
Italy and Sweden didn't result in more and better informed customers. The
benefits have only been for the electricity providers. Smart meters must be
based on open standards to avoid that only energy companies can provide the
equipment. Moreover the AIE is convinced that the full control for the
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customer of his energy consumption will only happen if the information flow is done in an appropriate way.

In order to reach the highest number of consumers, those meters should be installed in every household, and not just when a meter is replaced or newly installed or major renovations are done.

In the UK, the Smart meter program will be of great help in achieving this.

4.2. Do you think it appropriate that the requirement to provide individual metering and frequent billing (Articles 9(1), 9(3) and 10(1)) is subject to it being technically feasible and/or cost effective?

- Yes
- (●) No
- No opinion

Please explain your answer:

1000 character(s) maximum

No. There is of course a need to consider situations in which installing these meters will not be relevant. But the current exemptions (technically feasible; financially reasonable and proportionate to the potential energy savings) are too wide and need to be made more specific. The application of this article should be the same in all Member States.

Minimum functionalities for the meters should also be defined and standardised EU wide in order to provide consumers with the same level of information and services.

4.3. Should such conditions of being technically feasible and/or cost effective be harmonised across the EU?

- (●) Yes
- No
- No opinion

Please explain your answer:

1000 character(s) maximum

Yes. There is of course a need to consider situations in which installing these meters will not be relevant. But the current exemptions (technically feasible; financially reasonable and proportionate to the potential energy savings) are too wide and need to be made more specific. The application of this article should be the same in all Member States.

4.4. How would these conditions of being technically feasible and/or cost effective affect the potential for energy savings and consumer empowerment?

- Yes
- No
- No opinion

Please explain your answer:

1000 character(s) maximum

It should improve them as metering is a fundamental of energy efficiency. When designing the meters the minimum requirements of metering and billing should prepare the meter for additional information functionalities to be integrated when using complementary technologies, such as active control technologies and automation.

4.5. Smart meters: Do you think that A) the EED requirements regarding smart metering systems for electricity and natural gas and consumption feedback and B) the common minimum functionalities, for example to provide readings directly to the customer or to update readings frequently, recommended by the Commission (C(2012)1342) together provide a sufficient level of harmonisation at EU level?

- Yes
- No
- No opinion

Please explain your answer:

1000 character(s) maximum

4.6. What obstacles have national authorities/actors faced in introducing on a large scale individual meters that accurately reflect the final customer's actual energy consumption? Do you have any good experiences to share on how to overcome these obstacles?

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The major obstacle is the costs of the product and of the installation. Many Member States are not convinced of the profitability on the long term, mainly because the minimum requirements they consider are not the same for every Member States, thus implying very different production costs.

One other big issue is the privacy issue and consumers' data protection.

In the UK contractual and specification issues are the biggest problems. The

suppliers have the responsibility to install meters. There may be many different suppliers in one street or building.

5. Article 20: Energy efficiency national fund, financing and technical support

The analysis of the July 2014 Energy Efficiency Communication and the recent EEFIG Report showed that the energy efficiency investment market is still relatively small scale compared to its potential or the volumes needed to meet the EU's 2030 objectives. The European Structural and Investments Funds address the market gaps related to investment projects including those in energy efficiency, and the European Fund for Strategic Investments provides EU guarantee for investment projects – including those for energy efficiency. The European Energy Efficiency Fund carries relevant lessons.

Moreover, significant funding for energy efficiency comes from national public sources and the private sector. The effectiveness and impact of energy efficiency investments funding strongly depends (inter alia) on the implementation of the energy efficiency legislation, including the EED.

5.1. What should be the most appropriate financing mechanisms to significantly increase energy efficiency investments in view of the 2030 target?

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The insufficient take-up of the existing support schemes is partly due to the fact that it supports renovations with a long payback time, too long to interest investors. There is a need to first support highly profitable technologies and systems with a short return on investment time and only then support deep renovations.
The demand needs to be facilitated/created which will happen if consumers are better informed on both the energy efficiency measures and the access to finance. Information campaigns on easy to implement and short return on investment will stimulate the market.

The issue of split incentives between owners and users is a major limit to existing financing mechanisms. Energy performance contracting can be a solution to this challenge.

Citizens:
- Reduced VAT and income tax reduction for renovation, demolition and reconstruction works
- 0% int. loans for renovation
MS:
- Third party financing
- Guarantee fund for low rate loans
- Subsidies

5.2. Should there be specific provisions aimed at facilitating investment in specific areas of energy efficiency?

- Yes

- ○ No
- ○ No opinion

If yes, specify your answer from the below list:

- ☐ Building renovation
- ☐ Efficient appliances and equipment in households
- ☐ District heating and cooling network development
- ☐ Energy use by industries
- ☐ SMEs
- ☐ Companies
- ☐ City and community infrastructures in relation to transport, waste heat recovery, waste-to-energy
- ☑ Other

Please specify 'Other':

100 character(s) maximum

Renovation of public and commercial buildings. Financing mechanisms for SMEs

5.3. Do you agree that one way to increase the impact of energy efficiency investments could be through making the energy performance/savings monitoring mandatory under Article 20 whenever public funds/subsidies are used for EE investments? Such monitoring could be done, for example, via on-line platforms, by users in the regular intervals.

- ◉ Strongly agree
- ○ Agree
- ○ Disagree
- ○ Strongly disagree
- ○ No opinion

6. Article 24: Reporting and monitoring and review of implementation

The Energy Union Strategy foresees an integrated governance framework for EU energy and climate policies to ensure that agreed climate and energy targets are reached and to enable Member States to better coordinate their policies at a regional level.

6.1. Do you think that the existing reporting and monitoring system under the EED is a useful tool to track developments with regard to energy efficiency in Member States?

- ○ Yes
- ◉ No
- ○ No opinion

If no, how do you think it could be improved in the future?

1000 character(s) maximum

The revised text should provide a framework for periodical and regular reviews of the proper implementation of the EED and on the progress made on the path to the 2030 target.

This review should not only be based on Member States declarations but also on the Commission investigations, and be conducted by an independent entity assessing if the targets will be met.
Strict control over national transposition of the EED is crucial, the implementation being still incomplete in many Member States. The Commission should also verify the application of the measures included in Member States strategies and National Energy Efficiency Action Plans (see supra).

In some countries Energy policy is of regional competence (e.g. Belgium). However the targets should be national.

6.2. Do you think that the reporting of national indicators (for example, value added/ energy consumption, disposable income, GDP etc. for year (n-2) under Annex XIV (1)(a)) of the EED should be simplified?

- (●) Yes
- ( ) No
- ( ) No opinion

Please explain your answer:

1000 character(s) maximum

Yes, a simplified data reporting system would encourage data entry. The date reported upon should be accurate, be linked and reflect how the targets have been reached.

6.3. Do you think additional indicators (in addition to those referred to in Annex XIV (1)(a) – (e)) are needed to improve monitoring to assess Member States' progress towards their energy efficiency targets?

- ( ) Yes
- ( ) No
- ( ) No opinion

Please explain your answer:

1000 character(s) maximum

Member States regular reports should be accurate and reflect the real field state of actions instead of being based on approximations and estimations. To complete this goal, the targets should be coupled with key indicators in order to guarantee an efficient tracking.

The "Submit" button is located at the end of Part II. If you wish to only respond to questions in Part I, skip the questions in Part II and click "Submit" at the bottom of the next page.

Part II – Technical questions (on Articles 6 and 7)

7. Article 6: Purchasing by public bodies of energy efficient buildings, goods and services

7.1. Do you believe that measures on public procurement of energy efficient products, services and buildings should become mandatory also for public bodies at regional and local levels?

- (●) Yes
- ( ) No
- ( ) No opinion

Please explain your answer:

1000 character(s) maximum

Yes. A very important part of the public investments in Europe are made by local authorities, it is thus crucial these requirements apply to them;

7.2. In your view, what are the main barriers that preventing the use of energy efficiency requirements in the existing public procurement procedures (please select from the list and explain your reply:

- [ ] There is a lack of awareness about the use of energy efficiency requirements in public procurement
- [x] There is insufficient expertise and/or knowledge on the use of energy efficiency requirements in public procurement
- [x] Thresholds are too high which is why energy efficiency requirements do not apply to many contracts
- [ ] Incompatibility of energy efficiency requirements with other procurement criteria (sustainable requirements, low price, safety requirements, technical requirements)
- [x] Higher energy efficiency criteria in public procurements may imply higher prices
- [ ] Lack of clarity of the energy efficiency requirements for public procurement
- [ ] Energy efficiency requirements for public procurement are not very clear and difficult to check

☐ Other

Please explain your answer:

1000 character(s) maximum

7.3. In your view, should all EU public procurement rules relating to sustainability (including in particular energy efficiency in buildings, the use of renewable energy sources, etc.) be gathered into a single EU guidance framework?

- ◉ Yes
- ○ No
- ○ No opinion

Please explain your answer:

1000 character(s) maximum

Yes. Today various legislations apply to energy efficiency rules. A single EU guidance would help spread the information and clarify the measures to be applied and force Member States to act.

7.4. Do you think that there is sufficient guidance/framework to know what is meant by "energy efficient products, services and buildings"?

- ○ Yes
- ◉ No
- ○ No opinion

Please explain your answer:

1000 character(s) maximum

No. Today Member States apply different definitions and local authorities can also have different understandings. It is now urgent to harmonize the requirements. The information might be available but the definitions are not harmonised.

7.5. While energy efficient products will be cheaper to operate, their initial cost might be higher and a longer period of time will be needed to "pay back" this higher cost. Is this a problem and if so, how can public authorities overcome it?

1000 character(s) maximum

Public procurement should also consider the life cycle of the products and services costs, and not only the purchase costs. Such an approach would help make energy efficient technologies, with a market price higher but which also bring long term economies, more affordable. This would help boost their development.

8. Article 7: Energy efficiency obligation schemes

8.1. Emerging evidence suggests that most of the measures introduced under Article 7 have long lifetimes (20-30 years) and will continue have an impact beyond 2020. Do you share this view?

- (●) Yes
- ( ) No
- ( ) No opinion

Please explain your answer:

1000 character(s) maximum

8.2. What is your view on the potential benefits (listed) of energy efficiency obligation schemes?

	Strongly agree	Agree	Disagree	Strongly disagree	No opinion
Lower energy bills for consumers	(●)	( )	( )	( )	( )
Better awareness of energy efficiency potential by consumers	(●)	( )	( )	( )	( )
Better relationship between energy suppliers, distributors and customers	( )	( )	(●)	( )	( )
Lower energy generation (and transmission) costs for the utilities	( )	( )	( )	( )	(●)

Improved business and administrative environment for up-coming innovative energy services	◉	○	○	○	○
Aggregation of small-scale investments (pooling/bundling)	○	◉	○	○	○
Development of new financing models – e.g. energy performance contracting	◉	○	○	○	○
Stimulation of energy efficient renovation of buildings	◉	○	○	○	○
Increased competitiveness in the energy markets	○	○	○	○	◉
Other	○	○	○	○	○

Please explain your answer:

1000 character(s) maximum

8.3. Are you aware of any developments in the energy services markets that have benefited particular actors (e.g. service providers, suppliers, distributors, etc.) in Member States having an obligation to define the obligated parties under the energy efficiency obligation scheme?

- ◉ Yes
- ○ No
- ○ No opinion

Please explain your answer:

1000 character(s) maximum

Utility companies have the benefit of the energy data consumption and first hand information regarding the customer’s energy consumption. In Denmark and Germany, too much market influence and control of Utility companies have already led to unfair competition and market distortion between existing installation companies and new installation departments set up by Utility Companies. Unfortunate consequences of this model in Denmark have led energy companies to use energy efficiency funds for their own employees or as grants for ‘good' customers.

The achievement of end-use savings should be driven by consumer's responsibility well advised by independent qualified experts. We believe the best means to achieve energy savings, is through the effective encouragement of consumers to adopt installations and equipment of the highest energy efficiency. To achieve these safely, it requires the engagement of fully qualified specialists in competent Electrical Contracting companies across Europe.

8.4. If you think that some requirements of Annex V need more precise guidance please list those requirements and specify briefly what further information you think would be useful.

1000 character(s) maximum

Today Member States apply different definitions. It is now urgent to harmonize the requirements.

8.5. As you might know, the current framework of Article 7 is set until 2020, linked to the energy efficiency target for 2020, which will expire at the end of 2020. In your view, should the Article 7 obligations continue beyond 2020 in view of the new energy efficiency target for 2030?

- (●) Yes
- ( ) No
- ( ) No opinion

If yes, what factors should be considered for the future Article 7 (please select up to 5 options from the list, and explain your reply if possible):

at most 5 choice(s)

- [x] The amount of savings to be achieved should be set at a more ambitious level for post 2020 (exceeding the existing 1.5%)
- [ ] The energy efficiency obligations scheme should be kept as the only possible instrument to achieve the required savings
- [x] The possibility to choose between the energy efficiency obligations scheme and/or alternative measures should be retained
- [ ] The possibility to exclude sales in transport from the baseline should be removed
- [ ] The possibility to exclude sales in transport from the baseline should be kept but restricted to the fixed amount to ensure the level playing field
- [ ] The exemptions under paragraph 2 – applying a lower calculation rate (for the first years), and excluding sales in ETS industries, as well as allowing savings from measures targeting energy generation and supply – should be removed altogether
- [ ] The exemptions under paragraph 2 should be retained but the level and number of exemptions should be reviewed
- [ ] The possibility for 'banking and borrowing' energy savings from different years should be removed (paragraph 7(c))
- [ ] The possibility for 'banking and borrowing' energy savings should be kept with a possibility to

- [x] count savings towards the next obligation period (paragraph 7(c))
- [ ] Other

Please explain your answer:

1000 character(s) maximum

Energy efficiency obligation schemes have proved very efficient in many Member States, such as France. It is now time to set up a standard and common EU obligation scheme having in mind the EU energy goals.

The Commission should review the 1.5% energy savings target that is not ambitious enough and not in line with its 2030 climate goals and the recent COP21 Paris climate agreement. Article 7 gives the possibility to Member States to use a value of 1% in 2014, increased of 0.25% each year to reach 1.5% in 2018. The same increase could be made mandatory EU wide after 2018 using values of: 1.75% in 2019; 2% in 2020; 2.25% in 2021 and 2.5% in 2022, and so on.

The future directive must avoid today's discrimination of the use of electricity (see supra).

8.6. Do you think that the scope of eligible measures allowed under Article 7 should be clarified?

- (•) Yes
- ( ) No
- ( ) No opinion

If yes, please explain your answer further:

- ( ) The scope of eligible measures should only be end-use energy savings (as it is at the moment)
- (•) The scope of eligible measures should be expanded
- ( ) Other

If the scope should be expanded, please specify which of the following possibilities would be appropriate:

- [x] Measures to switch fossil fuel heating and cooling fully or partially to renewable energy (e.g. through individual appliances, district heating and cooling, centralised distributed units supplying larger building complexes or groups of buildings)
- [x] Measures to increase efficiency of district network infrastructure and generation, including through thermal storage facilities
- [ ] Measures to make energy generation from small scale generation more efficient, below the ETS threshold
- [x] Switch to self-consumption, auto-generation and energy positive buildings
- [x] Participation in demand response, including from providing storage capacities
- [ ] Primary energy savings from the utilisation and recovery of waste heat (e.g. in district networks)
- [x] Savings from energy management systems

- [ ] Energy savings from better organisation of activities
- [ ] Other

Please explain your answer:

1000 character(s) maximum

8.7. Would there be benefits in greater harmonisation of some of the requirements of Article 7 to allow more consistent implementation across Member States?

	Strongly agree	Agree	Disagree	Strongly disagree	No opinion
Calculation methods	◉	○	○	○	○
Materiality	○	○	○	○	◉
Additionality	○	○	○	○	◉
Lifetimes	○	○	○	○	◉
Price demand elasticities for taxation measures in real terms	○	○	○	○	◉
Indicative list of eligible energy saving measures	◉	○	○	○	○
Monitoring and verification procedures	◉	○	○	○	○
Reporting	◉	○	○	○	○
Other	○	○	○	○	○

Please explain your answer:

1000 character(s) maximum

8.8. What role should the EU play in assisting the Member States in the implementation of Article 7?

1000 character(s) maximum

The EU should facilitate exchanges on best practices and on efficient national policies.

8.9. Please state which best practice examples could be promoted across the EU and how?

1000 character(s) maximum

8.10. Would it be appropriate and useful to design a system where some types of energy savings achieved in one Member State would count towards obligations carried out either by governments or by economic operators in another country, just as the option to cooperate on greenhouse gas emissions reductions already exists?

1000 character(s) maximum

No. Countries going further than others and having best results than others should not be used by other Member States to meet their obligations. It is important that the EU goals are reached at national level in all Member States.

8.11. Would it be appropriate and useful to design a system where energy efficiency obligations would also include elements aiming at gradually increasing the minimum share of renewable energy applicable to energy suppliers and distributors?

1000 character(s) maximum

yes

8.12. Could the option of establishing an EU wide 'white certificate' trading scheme be considered for post 2020?

- Strongly agree
- Agree

- (●) Disagree
- ( ) Strongly disagree
- ( ) No opinion

Please explain your answer:

1000 character(s) maximum

Countries going further than others and having best results than others should not be used by other Member States to meet their obligations. It is important that the EU goals are reached at national level in all Member States.

Contact

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