

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 policies 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

CEPI - Confederation of European Paper Industries

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

100 character(s) maximum

Nicola Rega, Climate Change & Energy Director

*** Please enter your email address:**

n.rega@cepi.org

*** 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)
- Anonymously (I consent to publication of all information in my contribution and I declare that none of it is under copyright restrictions that prevent publication)
- Not at all – keep it confidential (my contribution will not be published, but it will be used internally within the Commission)

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?

1000 character(s) maximum

By implementing the EED into national law, every Member State had to adopt a national energy efficiency act/plan. As a consequence, member states had to focus their actions, particularly on sectors outside the ET ETS.

The EED also offers the Member States various degrees of freedom with regard to the way target is met. The degree of freedom gives the opportunity to use the existing voluntary agreements which have been successful for promoting energy efficiency in various member states.

Having said that, the EED per se might have only marginally contributed to the 2020 energy efficiency target, given the amount of horizontal policies already in place (energy labelling, standards, etc.). When it comes to energy intensive industry, such as the pulp and paper industry, competitive pressure has led to a continuous work on fostering energy efficiency measures at an installation or company level.

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?

1000 character(s) maximum

The targets for reduction of GHG emissions, energy efficiency and renewables interact with each other and may cause contradictions. The impact varies according to national circumstances.

In Sweden, for instance, for smaller installations, such as saw mills, the admin work in connection to EED has sometimes been seen as too high. The

national support system Program for Energy Efficiency has been the main driver for improvements in the the pulp and paper industry. Unfortunately, the program has been stopped, as deemed not to be complaint with EU state aid rules.

In the Netherlands, long-term voluntary agreements on energy efficiency apply for companies under the ETS (MEE-convenant) or outside the ETS (MJA3-convenant).

Energy use by small and medium-sized companies is largely covered by the Environmental Management Act.

The energy investment allowance (EIA) provides a net benefit of approximately 10% on investments in energy-saving measures.

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

1000 character(s) maximum

The impact depends on national circumstances.

The AT government introduced a completely new and very comprehensive Energy Efficiency Act. This led to long and intense discussions within the country.

For SE, see question 1.2.

In DE, there is an overlapping with national legislation when it comes to 2012 energy efficiency agreement regarding the energy tax adjustment ("Spitzenausgleich") which is granted to whole industry in case certain energy efficiency criteria are met. Also energy management systems are partly required to benefit from other exemption rules and therefore EED could be regarded redundant for the energy intensive/ETS industry.

The NL set energy-saving ambitions in a National Energy Agreement: the concerned parties will need to supplement the total ambitions if the new policy does not appear to be adequate. Concrete definition of these ambitions will enable their impacts to be counted under the EED. Expected additional savings: between 60 and 189 PJ

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

1000 character(s) maximum

In general, the EED is not really needed for the ETS sector, as there are enough incentives coming from the ETS to increase energy efficiency and by this reduce emissions. Having said that, the impact of the EED depends on national circumstances.

In AT, ambitious national goals have led to major competitive challenges for the Austrian industry, and impacted the free European Energy market. The obligation scheme has led energy suppliers to leave the country, due to the impossibility for them to reach the target.

In SE, the admin work has so far been manageable for larger installations, due to in-house knowledge and man hours needed. However, there has been confusion concerning which installations should be subject for energy audits under the definition of "large-sized company" when producing units are located in several Member States.

In the NL, the EED strengthened voluntary agreements MEE-convenant (Long-term voluntary agreements on energy efficiency for ETS companies).

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

1000 character(s) maximum

Improvements in energy efficiency are of central importance. However, energy efficiency has to be achieved by voluntary initiatives, rather than by mandatory requirements. An EU-wide binding energy saving target until 2030 would limit the scope for economic room to manoeuvre. A rigid objective as a binding cap on energy consumption would impede growth. Therefore, it is of vital importance that the Commission designs the target in such a way that recognises early measures and focuses on lowering the energy intensity, not the energy use as such.

The European framework has to create ideal long-term conditions to realize energy efficiency measures covering all sectors. This is particularly important for the non-ETS sectors, where incentives to improve energy efficiency are often insufficient.

Effective incentives are needed, especially for research and development as well as for the cost-efficient implementation of investments in energy efficiency measures.

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

1000 character(s) maximum

We believe that energy efficiency work must be done locally and as close to the energy consuming unit as possible. The role of the EU should therefore only be limited to setting targets, creating the overall regulatory framework, monitor the process in terms of energy efficiency improvements and give non-binding advice to those countries that are not able to reach the given goals. But details on how to implement energy efficiency policies need to be formulated at national or even industry level.

The EU should also promote and finance research and innovation in the field of energy and process technology to enable breakthrough technologies.

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

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

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

1000 character(s) maximum

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

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

In countries where voluntary agreements on energy efficiency in industry have been implemented, these agreements have led to the increased use of energy efficient technologies.

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

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)

- Too great flexibility to use wide range of measures: energy efficiency obligation scheme and alternative measures
- Strong opposition from energy suppliers and distributors to set up an energy efficiency obligation scheme
- 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
- High administrative burden
- Ensuring consistent application of the requirements with other energy efficiency legislation (e.g. building codes)
- 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

If the target would have been set as an energy intensity target, it would have been adequate and agreeable.

However, as it is set as an energy saving per se, we find it not agreeable. This is because once the "low hanging fruits" have been harvested, additional energy savings will become more difficult and expensive. For intensive energy consumers which using BAT and matured technologies, the remaining potential to improve energy efficiency economically is relative small. Thus the 1,5% target cannot be continued for many years, it needs to be reduced in later years.

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

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

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

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

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

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?

1000 character(s) maximum

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?

1000 character(s) maximum

It is important to find a high efficient way of financing. To make sure that the highest possible potential is tapped with the available amount of money, it is important to prefer energy investment funding for measures with high returns on investment.

One way would be to support investment in form of cheap call money from a revolving fund for efficiency measures that would otherwise not take place

without support. Ensuring that the invested money always returns to the fund (e.g. oney is paid back to the fund in the same rate as the energy savings pay back), allows multiple use of the available budget and therefore enables highest efficiency.

Interest-free loans to finance investments are also a way to achieve energy efficiency measures.

Tax decrease/benefit could also be envisaged if companies are participating in energy efficiency programs and achieving results.

Income from auctioning of emission rights should also be used to finance energy efficiency measures.

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

Support measure to be available for any type of industry actor independently of size and production

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

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

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

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

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
- There is insufficient expertise and/or knowledge on the use of energy efficiency requirements in public procurement
- 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)
- 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

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

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

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

It depends on the measures. The energy efficiency efforts in themselves, such as investments in better equipment, will of course continue to contribute to efficiency results also after 2020. But it is not straightforward to assume that such measures are directly linked to the implementation of Article 7.

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	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Better awareness of energy efficiency potential by consumers	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Better relationship between energy suppliers, distributors and customers	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Lower energy generation (and transmission) costs for the utilities	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Improved business and administrative environment for up-coming innovative energy services	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Aggregation of small-scale investments (pooling/bundling)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Development of new financing models – e.g. energy performance contracting	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Stimulation of energy efficient renovation of buildings	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Increased competitiveness in the energy markets	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

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

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

No, the level of preciseness should not be increased. On the contrary, it should be simplified.

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

Please explain your answer:

1000 character(s) maximum

No, unless the target is expressed as energy intensity and focusses only on non-ETS sector. Moreover, possibility to choose between obligation schemes and alternative measures should be maintained. The same would apply to exemptions.

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:

- 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)
 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
 Switch to self-consumption, auto-generation and energy positive buildings
 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)
- Savings from energy management systems
- Energy savings from better organisation of activities
- Other

Please explain your answer:

1000 character(s) maximum

Primary energy savings should also include benefits from combined heat and power (CHP).

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	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Materiality	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Additionality	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Lifetimes	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Price demand elasticities for taxation measures in real terms	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Indicative list of eligible energy saving measures	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Monitoring and verification procedures	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Reporting	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please explain your answer:

1000 character(s) maximum

We do not see the necessity for greater harmonisation as a certain level of flexibility should be kept for member states to adjust their preferred measures to their local environment.

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

1000 character(s) maximum

As earlier stated, the EU should focus on setting the overall target and implementing a general framework. It can play an advising role, but it should refrain from getting involved on a detailed level.

Having said that, in case any state aid is given for energy efficiency efforts, the EU must assure that this is done in full compliance with EU state aid rules to avoid unfair competition and distortion of markets.

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. Energy efficiency gains might be made where they are possible with the lowest investment, thus where they can be easily achieved. But no complicated system of "efficiency improvement certificates" should be created as this will for sure put an additional administrative burden on all actors.

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

No, the goal of the energy efficiency directive is to reduce the specific energy consumption, not to change energy sources.
If the switch to renewable energy sources would count as an energy efficiency measure, the total energy savings reached would decrease. In many cases it will be easier to change the energy source than to reduce one's consumption. People would in this case spend money on measures that would not decrease their specific energy consumption. This money would - from an environmental as well as from an economic point of view - better be invested in measures that do really decrease energy consumption.

It would therefore be counterproductive to prefer specific energy sources within the energy efficiency directive.

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

No further certificate system should be introduced. Administrative burden already now is more than high enough. Moreover, industrial processes are complex and extensive, which means that anyone engaged in energy efficiency efforts must possess in-depth knowledge on how and what one can actually do. This means that outside actors, such energy efficiency obligation scheme consultants, by definition will lack a true knowledge of what actually is achievable and how to do it. If such a EU-wide white certificate obligation scheme would be introduced, we would actually have to train outside consultants to understand and manage our internal processes, instead of doing the energy efficiency efforts ourselves. It comes without saying that taking in outsiders would be both complicated and expensive.

Contact

✉ ENER-CONSULTATION-EED@ec.europa.eu