



EUROPEAN FEDERATION
OF INTELLIGENT ENERGY EFFICIENCY SERVICES

FÉDÉRATION EUROPÉENNE
DES SERVICES EN EFFICACITÉ ET INTELLIGENCE ÉNERGÉTIQUE

21 January 2011

Energy Efficiency Plan 2001- 2020

EFIEES welcomes energy efficiency to be on the top of EU's political agenda 2011. We acknowledge it as a necessity, as well as we consider recently adopted policies and measures as useful ones:

- The Directive 2006/32 on Energy Efficiency in final use (EESD) expressly recognised the role of Energy Services Companies (in order to avoid any confusion they should rather be named «Energy Efficiency Services companies(EESCs) «as well as Energy Performance Contracts.

- The Directive 2002/91, revised 2010, on Energy Performance in buildings, has set principles and modalities of maintenance of heating and cooling installations in the buildings.

Nevertheless, we consider that a lot remains to be done in order to promote virtuous behaviors and to make the objective of 20% gains of energy efficiency in 2020 a reality.

The future Action Plan for Energy Efficiency 2011-2020 is consequently a great opportunity for EU legislator to give impulse for changes and...

➤ EU energy policies give priority to the *production* of energy and do not pay enough attention to measures focused on services/optimisation of the demand. EU regulation should:

- Better identify the reasons that explain the growth of final energy, the tools for decoupling «economic growth/energy demand" (not only technologies), the obstacles, to the development of various markets of demand optimisation in every Member State - in particular the market on which EESCs operate.
- Make compulsory or give strong incentives, through MS, the use of **Energy Performance Contracting**, in particular as regards public buildings, or also within the framework of national schemes such as "white certificates"

Nevertheless EFIEES remains careful about such « certificates » based on the obligation made to different actors of energy efficiency chain to justify for energy efficiency actions at the stage of final consumption. Before making any recommendation in favor of the creation of national systems, one should make a precise balance of the results of the different existing systems (administrative burden/obtained energy efficiency gains). As a matter of facts, it is clear to us that obligations should not be borne by the suppliers (in the sense of the electricity and gas Directives), but by the distributors, which would have to ensure that their final clients develop energy efficiency actions through EESC.

With the experience of the last Energy Efficiency Action Plan, in 2007, we think that a compulsory target aiming at improving energy efficiency remains the only way to make significant progress. The offer of goods and services exist, it must be mobilised thanks to a clear political and legal signal.

We are nevertheless aware of the difficulty to measure gains of energy efficiency, at installations level as well as at Member State level. It is important that EU keeps making some progress on these methodological questions, in order to have the appropriate tools for assessing the improvements of energy efficiency.

- EU energy policies focus on electricity and neglect **thermal energy**. As far as households, public buildings (heating, air conditioning) industries (heat or cool for process) and district heating networks are concerned, energy efficiency in thermal energy has to be encouraged:
 - Regulatory framework and tariffs (Eastern Europe) can be obstacles to more efficient production and consumption of heating/cooling ; the fact that heat market is a local one should be better taken into consideration, without excluding an appropriate action at European level;
 - Heat should be considered in reflections on cogeneration, too often focused on « main » production of electricity whereas heat is seen as a « by-product ». On the contrary, one has to be aware that maximum yield is obtained when the design, dimension and operation of the installations are determined by the needs of heat, electricity being consequently a kind of secondary product.
- EFIEES expresses concerns in case EESD and Cogeneration Directive would be merged, despite the fact that they deal with very different subjects. There is a clear need for separate regulation, in order to avoid confusions and inconsistencies. As a matter of fact, **it is absolutely necessary to distinguish clearly savings of primary energy and savings of final energy** ;

A stricter Cogeneration Directive, far from stimulating the development of cogeneration, would strongly penalise as well as district heating;

A final methodological remark: EU ETS is not at all an incentive for savings of primary energy, but only for the reduction of CO2 emissions. At a large scale, the reduction of CO2 emissions occurs in most cases thanks to measures allowing switching to less carbon-intensive fuels, rather than thanks to reduction of consumption. It is therefore useful to remind, as a conclusion, that policies of reduction of CO2 emissions can not be substituted to energy efficiency policies!