

Public consultation on the Heat Pump Action Plan

EFIEES remarks

EFIEES is the voice of private energy service companies (ESCOs) and their national associations across Europe. Our members represent over 100.000 professionals committed to the design and the implementation of energy efficiency measures in public and private buildings, industrial facilities, as well as to the efficient operation of district heating & cooling networks.

In order to address the challenge posed by the energy crisis stemming for the Ukraine invasion by Russia whilst pursuing its decarbonisation roadmap, the European Commission has launched the REPower EU action plan that includes, as one of the key measures, a strategy to boost the heat pumps deployment. Given the climate emergency, the limited public and private financing resource, the bottlenecks in manpower and manufactured equipment, it is of outmost importance to optimise the deployment of all possible solutions, and to make sure heat pumps are installed where and when most appropriate.

Reduce the energy demand as a first priority

Beyond the respect of the energy first principle, **reducing or optimising the energy consumption** in buildings and in the industry, is an absolute prerequisite. Not only will the improved energy performance of buildings maximise the benefit of the renewable and waste heat energy produced but it will, if carried out properly, reduce the heating temperature required. It will consequently allow the heat pumps to optimise their operational performance as well as the peak electricity demand and the subsequent cost for the users. **A certain level of energy performance in buildings is definitely a key condition for a successful use of heat pumps.** It is therefore necessary to make sure **energy management solutions**, such as Energy Performance Contracting, are highlighted in the action plan. They improve and guarantee the buildings' energy performance **over time**, by accompanying deep or staged deep renovations.

Take into consideration local approach in the deployment plan

A series of elements on the ground, e.g. space to install the equipment, climate conditions, energy performance of buildings, must be taken into consideration for the deployment of heat pumps. Generally speaking, there is no one-size-fits-all solution, and **all the different thermal solutions have a role to play**, combined when relevant with heat pumps. In order to reach decarbonisation goals and reduce electricity needs during the winter consumption peaks, solutions can be given consideration, such as hybrid heat pumps, which thanks to their coupling with a gas (or biomethane)-fired boiler, can avoid having to use electricity when the electrical grid is under pressure.

Hence the roll-out of heat pumps should be included in a more general approach, possibly at district level, planning and supporting the various decarbonisation solutions depending on their CO² emissions, energy efficiency and economical merits.

This is particularly true for efficient district heating and cooling networks (EDHC). EDHC are the main technology for greening heating & cooling consumption, and are an ideal vector deploy and couple the use of heat pumps with other

renewable local resources such as waste heat, geothermal energy, sustainable biomass, RFNBO ¹. In that respect, the energy performance and the temperature regime of the connected buildings mentioned above will also be key, as they strongly influence those of the DHC.

A successful plan should be supported by appropriate resources

The energy crisis that triggered the REPower EU action plan highlighted vulnerabilities in EU's energy supply. In that respect it is essential that a resilient manufacturing base is maintained in Europe, especially on specific critical components, such as electronics and control systems.

The planned step change in the heat pumps roll-out will not only require manufacturing capacities but also skilled technicians to install, maintain and operate these installations. In that respect, the priority should be given to the attractiveness and the resourcing of candidates, including by upskilling other sectors' existing workforce thanks to training. Industries and bodies in charge of professional training should work hand in hand to solve this key challenge, possibly with the support of EU funds.

Carbon pricing is key

To facilitate the deployment of RES based solutions, levelling the playing field with fossil fuels is crucial: CO2 pricing, energy taxation, State aids, as mentioned in the questionnaire, are decisive to trigger investments. Such instruments have to reflect the actual CO2 emission levels of solutions deployed on the ground.

Supporting a stable and coherent EU legal framework

A massive roll-out of heat pumps is a major challenge for the industry and for the consumers. A **stabilised**, coherent **EU legislative framework**, with a strong focus on the implementation of the Fit for 55 package, is needed to ensure the EU economy will be able to make the efforts to comply with the 2030 energy and climate objectives. It is paramount to ensure the credibility of the targets, with a major effort on their **implementation**, in order to give the necessary visibility for deciding new investments. The EU action plan to deploy heat pumps should reflect the key idea of a **path** towards the carbon neutrality in 2050, to phase out fossil fuels, building on the recent recasts of EED and EPBD.

¹ Renewable Fuel of Non-Biological Origin