

EUROPEAN COMMISSION

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

Final Synthesis Report

**Directorate-General for Energy, Unit C.3 Energy Efficiency
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Table of Contents

Executive summary 2

Introduction and approach..... 6

Participants 8

Responses 9

 Part I – General questions 9

 1. Articles 1 and 3: Overarching issues, scope and target 9

 2. Article 6: Public procurement 17

 3. Article 7: Energy efficiency obligation schemes..... 21

 4. Article 9-11: Metering and billing..... 26

 5. Article 20: Finance 33

 6. Article 24: Monitoring..... 36

 Part II – Technical questions 40

 7. Article 6: Public procurement (continued) 40

 8. Article 7: Energy efficiency obligation schemes (continued) 46

Annex I: List of online survey participants 63

Annex II: Statistical overview of online survey participants 76

Annex III: Survey questions..... 79

Executive summary

Background and approach

This public consultation was launched on 4 November 2015 to collect views from stakeholders for the review of the Directive 2012/27/EU on energy efficiency (EED). It accepted responses for over 12 weeks and closed on 29 January 2016. The consultation was based on an online survey. It focused on certain aspects of the EED, namely Articles 1, 3, 6, 7, 9-11, 20 and 24 respectively, as outlined in the EED review's Evaluation and Inception Impact Assessment Roadmaps. A functional email address was installed to provide assistance to participants, as and if needed. In line with the Better Regulation requirements and to assure transparency, submissions were published on the consultation website, unless confidentiality was requested.

Participants

The online survey received **332** submissions, and the functional email address received an additional **69** documents, either complementary to or *in lieu* of survey-based submissions. Most contributions were submitted by industry associations (140), private companies (47) and NGOs (33). A total of 18 central public authorities submitted contributions, including 17 from within the EEA. Of the 17 central public authorities from within the EU, 4 requested to remain anonymous. The remaining 13, all of which represented Member States, were from Austria, Belgium, Croatia, the Czech Republic, Denmark, Estonia, Finland, France, Hungary, Latvia, Lithuania, the Netherlands and Slovakia.

A summary of the main views related to the specific Articles of the EED is provided below:

Articles 1 and 3: Overarching issues, scope and target

Most participants agreed that the EED has successfully established a comprehensive energy efficiency framework for the EU. Several also explained that the EED has been a key driver of initiatives in Member States, as evidenced, for example, by the extent to which Energy Efficiency Obligation Schemes (EEOSs) have been implemented across the Union. Participants also underlined, however, that the present framework remains complex, and that Member States require additional guidance. Energy savings calculations ought to be based more on observed data and less on projected estimations. Participants requested the Commission to focus more on the transport sector, monitor Member States' progress, and, if necessary, sanction non-compliance. 31% shared the view that the 2030 target should be expressed as both primary and final energy consumption, versus 23% who wanted it to be presented in terms of energy intensity. A large majority (73%) shared the view that energy consumption should be targeted irrespective of its source.

Article 6: Public procurement

42% did not think that there is sufficient guidance in their country to accurately characterise energy efficient products, services and buildings, versus 28% who thought that there is sufficient guidance. 53% agreed that procurement rules should also apply to public bodies at regional and local levels, versus 21% who opposed this idea. In this context, however, several participants also argued that public procurement rules would not be necessary, if authorities would factor in lifecycle cost savings correctly. For this reason, several made the case that public authorities must stop calculating only the costs for the present year, and instead base purchasing decisions on lifecycle cost analyses. Currently, accounting rules – for instance when assessing the balance of public budgets – would be biased against energy efficiency investments. More than half (52%) were in favour of collecting all EU public procurement rules under a single EU guidance framework, versus 15% who opposed this idea.

Article 7: Energy Efficiency Obligation Schemes (EEOSs)

A large majority (68%) thought that Article 7 is an effective instrument for achieving final energy savings, versus 32% who opposed this view. Article 7 was seen as significantly stimulating the European energy efficiency service market, while simultaneously granting Member States valuable legislative flexibility. The three main barriers identified by participants to implementing Article 7 effectively were:

- A 'limited timeframe (2014-2020) that makes it hard to attract investment for long term measures' (115);
- A 'high administrative burden' associated with certain measures (113); and
- 'Ensuring sound and independent monitoring and verification of energy savings' (104).

Amongst those who favoured the extension of the policy, several argued that as savings could only be calculated up to 2020, the current scheme would discourage long-term measures towards the end of the legislative period. This contrasted with the assessment of 71% who thought that most measures introduced to-date under Article 7 have long lifetimes, and corresponded with the view of 63% who stated that the policy should continue beyond 2020.

More than half (57%) disagreed (39%) or even strongly disagreed (18%), however, that the current 1.5% energy savings target is adequate, versus 26% who either agreed (23%) or strongly agreed (3%). Some explained that savings could not increase linearly, and that logarithmic – that is, marginally decreasing gains – would be more realistic. Others made the case that energy suppliers are the wrong target group, as they neither primarily generate nor consume energy. Yet others pointed out that a 1.5% target is only marginally above the 1% natural rate of energy efficiency gains, and that the target would have to be more ambitious to comply with the new climate goals ratified during the 21st Conference of the Parties of the United Nations Framework Convention on Climate Change (COP 21) to reduce global greenhouse gas emissions and stabilise global warming at 1.5-2 °C.

Participants were divided on whether EEOs should have specific rules for vulnerable consumers, with 35% opposing such rules and 30% being in favour of them.

Furthermore, 54% either strongly disagreed (36%) or disagreed (18%) that the option of establishing an EU-wide 'white certificate' scheme for energy efficiency gains should be considered for the post-2020 period; 25% had no view, while 21% were in favour of such a scheme.

Articles 9-11: Metering and billing

43% shared the view that the EED's provisions on metering and billing are sufficient to guarantee consumers easily accessible, sufficiently frequent, detailed and understandable information on their energy consumption; 32% opposed this view and 25% had no specific view on this. Nearly half (47%) did not think that conditions such as technical feasibility or cost effectiveness, however, should be harmonised across the EU, as such conditions would vary too greatly between Member States. The greatest obstacles identified by participants to a large scale roll out of smart meters were cost effectiveness and consumer acceptance. Regarding the latter, many noted that smart meters would raise a number of data protection and cyber security issues. One Member State was cited several times as an example of how to address such concerns: citizens are entitled to 'opt out' of the smart meter scheme, but if they wish to withdraw, they may not track their energy consumption online. They would nevertheless be required to provide accurate data to their respective utility.

Article 20: Finance

Participants presented a wide range of financial mechanisms that could increase investments in energy efficiency, including direct subsidies, long-term loans with low interest rates, and technical assistance aimed at SMEs. Some also argued that the "energy efficiency first" principle should be applied to the revenue generated by the EU ETS, and warned about falling into the trap of a "stop and go" approach: the Commission and Member States should try to prevent initiating certain policies which are later put on hold before they are fully implemented, as this could significantly impair successful policy outcomes. Best practice examples would have to be shared more widely across Member States. A large majority (82%) agreed that there should be provisions aimed at specific sectors, the three most popular being 'building renovation' (165), 'district heating and cooling network development' (93) and 'city and community infrastructures in relation to transport, waste heat recovery, [and] waste-to-energy' (85).

Article 24: Monitoring

51% shared the view that the existing reporting and monitoring system would be a useful tool to track Member State progress, versus 29% who had no view on this and 20% who opposed this view.

Nevertheless, many also argued that the system could be improved, for example by collaborating more with Eurostat; streamlining and standardizing data flows, for instance with the help of an obligatory reporting template for Member States; and drawing more on verifiable, independently collected data. While most participants (45%) had no explicit view on whether additional indicators to the presently available ones should be added, 22% did call for further indicators that highlight the multiple benefits of energy efficiency. 33% opposed further indicators, out of considerations of unnecessary complexity.

Overall conclusions

Based on these findings derived from stakeholders' submissions, the consultation presents several key conclusions: Article 7 is widely recognised to advance energy efficiency across the EU, and its obligations should be extended beyond 2020. Member States must simultaneously remain flexible to be able to cater to local conditions. Some Member States require additional guidance on certain technical provision of the Directive, such as eligibility, additionality and materiality criteria. There is no clear verdict, however, on whether EEOSs should have special rules for vulnerable consumers. Furthermore, the Commission ought to focus more on the transport sector, monitor Member States' progress, and, if necessary, sanction non-compliance. When rolling out smart-meter schemes, particular attention must be devoted to addressing cyber security concerns. Accounting rules appear to be biased against energy efficiency investments, for example when calculating the balance of public budgets. Public authorities at both central and local levels should therefore be encouraged to base public procurement decisions on lifecycle cost analyses. If necessary, the Commission should provide technical assistance in this regard. Finally, better, verifiable, independently collected data is needed to track progress across the EU. Information flows may thus have to be streamlined and further standardised.

Glossary of acronyms and abbreviations

Commission	European Commission, unless specified otherwise
DG	Directorate-General
Directive	Energy Efficiency Directive (2012/27/EU), unless specified otherwise
EcoDesign	EcoDesign Directive (2009/125/EC)
EE	Energy efficiency
EED	Energy Efficiency Directive (2012/27/EU)
EEOS	Energy efficiency obligation scheme
Energy Labelling	Energy Labelling Directive (2010/30/EU)
EPBD	Energy Performance of Buildings Directive (2010/31/EU)
ESCO	Energy services company
ESD	Energy Services Directive (2006/32/EC)
ESIF	European Structural and Investment Funds
ETS	Emissions Trading System
H2020	Horizon 2020
M&V	Monitoring and verification
MS	Member State
NEEAP	National Energy Efficiency Action Plan
PPD	Public Procurement Directive (2014/24/EU)
SME	Small- and medium-sized enterprise
SWD	Staff Working Document
TCO	Total Costs of Ownership

Introduction and approach

This public consultation was launched on 4 November 2015 to collect views and input from stakeholders and citizens for the review of the Energy Efficiency Directive (EED), formally known as Directive 2012/27/EU. In line with the European Commission's Better Regulation package, the online-based survey accepted response for over twelve weeks, closing on 29 January 2016. Responses submitted late were accepted for over a week after this deadline.

The review of the EED plays an important role for the Commission's Energy Union Strategy, adopted on 25 February 2015, to treat energy efficiency as an energy source in its own right. It also contributes to the process of making sure that legislation is up-to-date and consistent with the 2030 Framework for Climate and Energy, given three important policy developments since 2014: first, in October 2014, the European Council agreed on an EU energy efficiency target of at least 27% for 2030, to be reviewed "having in mind an EU level of 30%"; second, the Council mandated the Commission to carry out the review of this target by 2020; and third, in December 2015 the European Parliament requested the Commission to also assess the viability of a 40% energy efficiency target for 2030.

While many measures taken by Member States today will continue to deliver energy efficiency beyond 2020, energy efficiency legislation – as an integral part of the EU's policy portfolio – has already delivered tangible results. As noted by the Energy Efficiency Progress Report¹, published on 18 November 2015, for example, average primary energy intensity substantially decreased across all Member States between 2005 and 2013, with the exception of one Member State, and this trend is expected to persist.

The current European energy efficiency framework is comprised of three key initiatives beyond the EED itself: the Energy Performance of Buildings Directive (EPBD)², the Energy Labelling Directive³, and the EcoDesign Directive⁴. These are not, however, the only European actions to foster the Union's energy efficiency, and many further instruments are linked to EU climate policies, such as CO₂ emission standards for passenger cars and 'light commercial vehicles'. Given that COP 21 reemphasised the importance of limiting global warming to below 2 °C, and called for "efforts to limit the temperature increase to 1.5 °C above pre-industrial levels", energy efficiency will continue to play an important role for the EU's climate and energy initiatives in the decades to come.

In the context of "decarbonising" the EU economy, public funding has played an increasingly important role in furthering energy efficiency policies at national and regional levels. European Structural and Investments Funds (ESIFs), as well as the European Fund for Strategic Investments (EFSI), for example, have already played a key role in unlocking private energy efficiency investments, and rely on legislation such as the EED, which creates a pull effect on this type of financing. Improving the EED therefore plays a crucial role in unlocking energy efficiency potential in a wide range of areas beyond the immediate scope of the directive itself.

Despite these success stories, however, Member States have not collectively set sufficiently ambitious national energy efficiency targets to reach the 20% EU savings level by 2020. The Energy Efficiency Progress Report⁵ stated, for instance, that the sum of all national indicative targets amounts to 17.6% of primary energy savings for the same timeframe. Based on the findings from the recent Evaluation of the EED, the Commission remains optimistic that the 20% target will be reached on time, provided that existing EU legislation is fully and correctly implemented, Member States increase their level of

¹ Staff Working Document (2015) 245 final

² Directive 2010/31/EU

³ Directive 2010/30/EU

⁴ Directive 2009/125/EC

⁵ Staff Working Document (2015) 245 final

ambition, and conditions for private energy efficiency investments continue to improve. Calibrating the overall energy efficiency framework for the EU, by for instance adjusting the EED, may hence be more pertinent than ever.

Given the recent implementation date of the EED, this consultation only covered a narrow scope of issues, and focused on the following articles of the directive for the indicated reasons:

- **Articles 1 and 3**, as required by the European Council⁶ to set a minimum 27% target for 2030 and to review it by 2020 having in mind an EU level of 30%;
- **Article 6**, as required by the reporting obligation under Article 24(8) to review its implementation;
- **Article 7**, as required by the reporting obligation under Article 24(9) to review its implementation and its obligation period, the latter of which will expire after 2020;
- **Articles 9 – 11**, as consumer related issues which are touched upon by these articles are being re-addressed in parallel by the Internal Market Design and the Delivering a New Deal for Energy Consumers initiative;
- **Article 20**, as the European Fund for Strategic Investments (EFSI) and overarching "Junker Plan" have explicitly called for addressing market gaps for private energy efficiency investments;
- **Article 24**, given the parallel initiative to develop and implement a new governance system under the Energy Union and for the 2030 Energy and Climate Framework.

The questions of the consultation addressed the above articles, and were formulated so as to respect the Commission's new 'better regulation' requirements, and to assure that its results are fed into two parallel processes: first, to assess whether relevant measures are effective, efficient, and coherent within the broader EU legislative framework; and second, to identify the most appropriate policy options to be considered by the EED impact assessment.

The survey was divided into two general sections, the first including more general questions, the second presenting more technical ones. Participants were invited to answer all questions deemed relevant. The functional email address ENER-CONSULTATION-EED@ec.europa.eu was installed so as to assure additional guidance for participants, if required. The introduction of the consultation was translated into all 24 EU languages, which were published on the consultation website. To assure transparency, both preliminary contributions as of 26 January 2016, and final contributions as of 29 January 2016 were made publicly available as Excel files. Statistical contributions were evaluated by a customised spreadsheet model, while the qualitative submissions were methodologically assessed with the help of a cluster analysis. Particular participant profiles were created for the analysis of some specific questions to gain analytic depth. All quantitative figures are derived from a dataset that was retrieved from the consultation website on 9 February 2016.

⁶ European Council conclusions of 23/24 October 2014, http://www.consilium.europa.eu/uedocs/cms_data/docs/pressdata/en/ec/145397.pdf

Participants

The online survey received a total of 332 submissions. The functional email inbox received an additional 69 documents, either complimentary to or *in lieu* of an online submission. 94% of all participants answered on behalf of an organisation or institution, and 6% responded as private individuals. Most contributions were submitted by industry/business associations (140), followed by private companies (47), non-governmental organisations (33), utilities (27) and 'other interest group organisations/associations' (17).

A total of 18 central public authorities submitted contributions, including 17 from within the EU and from Norway. Of the 17 central public authorities from within the EU, 4 requested to remain anonymous. The remaining 13, all of which represented Member States, were from Austria, Belgium, Croatia, the Czech Republic, Denmark, Estonia, Finland, France, Hungary, Latvia, Lithuania, the Netherlands and Slovakia. Denmark, France, the Netherlands and Norway also submitted non-survey based contributions.

Of all the organisations that submitted contributions, 73% reported to primarily deal with energy issues. Most organisations stated to be active in Belgium (65), which may be explained by the fact that most European-wide organisations are based in the Brussels area and are officially registered with the Belgian authorities. Organisations reported to be second most active in Germany (45), followed by France (24), Austria (17), Italy (16), Sweden (16), the United Kingdom (16), and Finland (15). Many organisations also reported to be active either in several EU Member States, or beyond the borders of the EU (42). The large majority of participants, namely 83%, consented that their contribution be published on the Commission's website under their indicated name.

Responses

Part I – General questions

1. Articles 1 and 3: Overarching issues, scope and target

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

Many participants stated that the EED has established a comprehensive legislative framework for 2020 and beyond for energy efficiency, in part by setting clearly identifiable targets. The EED and its 1.5% energy savings obligation under Article 7 in particular, would be a useful policy tool for achieving the 2020 target, and for placing energy efficiency on the policy agendas of Member States. Some participants also noted that the EED has incentivised behavioural change at institutional levels. Nevertheless, some participants also called attention to the recent implementation deadline, and that it would therefore remain difficult to adequately evaluate the EED's overall merits. Many Member States would continue to struggle to correctly implement some of the EED's more technical provisions.

Responses included the following passages:

"The EED represents a powerful tool to achieve the Europe 2020 targets, though we perceive energy efficiency as one of the tools of decarbonisation process. The main benefit of the EED is that it sets the common framework within the EU and identifies the areas with the energy savings potential. [...]" – Ministry of Industry and Trade of the Czech Republic.

"Setting a saving target of 1,5 % of the annual energy sales for Member States will be a main factor which will help to achieve energy efficiency target by 2020." – Ministry of Energy of Lithuania.

"[...] Due to the relatively recent implementation of the Directive in most Member States it is often too early to give a final account on whether the choice of burden sharing has been successful in terms of target achievement and cost efficiency." – EURELECTRIC.

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?

While many participants stated that the EED works relatively well with other energy efficiency legislation, some also noted that many regulations and guidelines would be very complicated, bureaucratic and expensive. Some also explained that the EED and the Effort Sharing Decision are complementary to one another, as the EED reduced greenhouse gas emissions (GHG) in non-ETS sectors. In this context, some wrote that an extension of Article 7 could particularly reduce non-ETS GHG emissions.

The ETS, in turn, would stimulate many energy efficiency investments within the ETS sector itself. The EED would also, however, undermine the ETS to the extent to which it reduces the price of carbon certificates. A few participants stated that it would remain difficult to quantify the synergies between the EED and its predecessor, the Energy Services Directive⁷ (ESD), due to the recent transposition deadline of the EED in 2014, and the reporting cycle of the ESD, the latter of which would not coincide with the former. Energy efficiency gains would also contribute to the renewable energy goals, by reducing overall primary energy consumption.

Responses included the following passages:

"The reduction of GHG goes hand in hand with EE, the EED, the ESD & ETS are thus interrelated. The EED is a vital instrument in helping MS to achieve their ESD targets whilst ensuring a level playing field amongst them. [...]" – Belgian Federal and Regional Ministries.

"In general, the abovementioned energy efficiency legislation seems to work well with each other. There are, however, some examples of overlaps with undesired consequences. The most important one regards the role of buildings in achieving the EU climate and energy targets. Specifically, the current application of conversion factors is undermining the attractiveness and benefits to be gained from some efficient technologies that heavily rely upon electricity (e.g. heat pumps). This in turn affects consumer's decisions to an extent that limits the Member States flexibility of achieving energy efficiency target granted under the EED. [...]" - PKEE Polski Komitet Energii Elektrycznej – Polish Electricity Association.

"[...] The EED and ESD are complementing each other as saving energy is the first and biggest cost-effective national measure to reduce non-ETS GHG emissions. The ETS primarily stimulates EE investments within the ETS sector. [...]"- Deutsche Unternehmensinitiative Energieeffizienz e.V. (DENEFF).

⁷ Directive 2006/32/EC of the European Parliament and of the Council of 5 April 2006 on energy end-use efficiency and energy services and repealing Council Directive 93/76/EEC.

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

Participants explained that the EED is a key driver of energy efficiency legislation at a Member State level, as evidence for example by the extent to which Energy Efficiency Obligation Schemes (EEOSs) have been implemented across the Union. One key positive synergy that was mentioned several times was that the EED not only saves energy, but also GHG emissions. Some also highlighted positive synergies between the EED and the EPBD, the former of which would stimulate renovation rates, while the latter would advance the "depth" of the renovation rate within the building stock. Yet a further positive synergy would be an overlap between Article 14 of the EED and Article 13 of the RES-D, which would require Member States to support heating and cooling from renewable energy sources, in the planning of urban infrastructure. Some participants also noted difficulties. For example, certain provisions, such as the requirement for large companies to undertake energy audits, would have been implemented too quickly, causing confusion.

Responses included the following passages:

"We have not detected overlaps at Spanish level so far, but we have to take into consideration that the Directive has not yet been totally transposed, so some articles are not yet applicable at a national level. What we see more largely is rather a lack of harmonized rules/practices in place at local level to define a proper market conditions across Europe (e.g. lack of skill definition, not clear definition of energy contracting and no pan-European certification scheme for auditors)." – AFME (Spanish Association of Electrical Equipment Manufacturers).

"The EED has acted as a driver to incite national governments to focus on what they can do to achieve the 2020 EE target. A positive development that the EED provoked is the preparation of long-term strategies under Article 4 for boosting investment in the renovation of the existing building stock. [...]" – EuroACE (European Alliance of Companies for Energy Efficiency in Buildings).

"Potential issues coming from conflict with national rules are often due to the general framework in place and not to the EED specifically. For example, issues about tax incentives potentially being put into question by EED rules are linked to the state aid framework for energy efficiency. [...]" – CECAPI (European Committee of Electrical Installation Equipment Manufacturers).

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

Views varied strongly on this issue. Some participants noted that the main lesson learnt was that progress is slow, and that state expenditures appear to be designed in such a way that they do not always pursue cost-effective measures. Again, others noted that, given the recent transposition deadline (5 June 2014), it would still remain too early to conclude what lessons could be derived from the to-date implementation of the EED. Some participants also highlighted the need for clear, binding targets, not only for Member States, but also for individual sectors. The target would have to be ambitious, but realistic. Several participants also called attention to complexity, and that Member States would require more guidance, as evidenced for example by the observation that most Member States would have received reasoned opinions from the Commission. Transposition deadlines would be too short and unrealistic. Other participants explained that the EED would be a flagship policy initiative, and that the sunset clauses of certain articles would have to be lifted. Many Member States would not recognise the multiple benefits of energy efficiency.

Responses included the following passages:

"[...] The current ending of key articles in 2020 is a barrier to implementation. To ensure predictability & investor stability a continuation of the EED framework is necessary. This includes the continuation of article 7 beyond 2020. This will incentivise the creation of long-term measures and schemes to deliver savings, building on experience of creating successful & effective schemes."
– Coalition for Energy Savings,

"[...] Too much attention is given to savings calculation methodologies, double counting and other technical requirements. More options to use simplified monitoring and verification systems should be available. [...]" – Ministry of Economics of the Republic of Latvia,

"The EED is a good and useful instrument, however often not appropriately followed up at national level with timely and sufficiently ambitious transpositions or proper market surveillance and enforcement activities. Indeed, the transposition is taking too long in many countries or sometimes not happening. This undermines industry's energy efficiency investments, and the viability of the rule of law [...]" – European Building Automation and Controls Association (eu.bac),

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

Many stakeholders pointed out that the Commission should focus more on energy efficiency measures in the transport sector, and incentivise more behavioural change by consumers. Some participants also argued that consumer empowerment should be explicitly mentioned in the EED and Article 7 in particular, to assure that incentives for behavioural changes are not disregarded by Member States.

Furthermore, methodologies used to calculate energy savings should reflect actual energy savings, not projected energy savings. Calculations should draw more on real data. The Commission should also make sure that future measures adhere to the criteria of being cost effective.

Several participants also noted that the Commission must remember that climatic conditions vary significantly across the EU, and that Member States face different economic barriers. There may be no single energy efficiency solution for the whole Union. Still others highlighted the need for provisions to remain flexible, so that Member States can choose measures that are appropriate for their countries. Finally, to assure that a minimum target for 2030 is reached, obligations under Articles 1, 3, and 7 should be extended beyond 2020.

Responses included the following passages:

"The European heating industry supports a 40% EU binding energy efficiency target for 2030. Such target will give the right impulse to our industry and confirm that Europe is committed to saving energy and supporting its industries in achieving this goal. [...]" – European Heating Industry Association – EHI.

"[...] The more action is taken now, the easier and less costly it will be to live up to already made commitment & further ones." – ORGALIME – The European Engineering Industries Association.

"BEUC supports future energy and climate policies built on the most cost-effective solutions in the long term, while keeping energy affordable. Energy efficiency can be the best energy 'source' investment improving affordability of energy, driving down the need for additional and costly infrastructure and tackling climate change among others. [...]" – BEUC, The European Consumer Organisation.

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

The Commission should coordinate Member State activities, and harmonise initiatives across the EU. It should also propose a binding energy efficiency target for 2030, and monitor Member State progress towards the target. Some participants underlined that the Commission should sanction non-compliance if necessary. The Commission should make sure that the EU remains at the global forefront of protecting the climate. Furthermore, it should make sure that products in the EU are energy efficient, remain 'technology neutral' when discussing policy options, provide Member States with best practice examples, focus on capacity building at a Member State level, and provide accurate, reliable data on energy efficiency advancement. Additionally, the Commission should establish a long-term regulatory framework to support medium- and long-term financial investments.

Responses included the following passages:

"Facilitating the implementation, making the sharing of knowledge and experience possible. The real expertise is in the MS, not in the Commission. Co-ordination is useful, micro-management is not, patronizing is harmful." – Energy Authority of Finland.

"The European Commission must make sure Member States correctly implement the body of legislations in the field of energy efficiency and go after those who fail to implement and enforce those legislations. In the future, we also would like to see any energy governance system to help the European Commission and the Member States monitor and track progress or deviation in the field of primary energy consumption/savings." – Italcogen-ANIMA - Italian Association of CHP System Manufacturers & Distributors in ANIMA federation.

"Sanction the infractions committed by not meeting deadlines. Ensure that Member States carry out an effective transposition from the legislative point of view and develop norms on their own initiative that go in line with the philosophy, obligations and development of the efficiency Directive." – Agencia Andaluza de la Energía (Andalusian Energy Agency).

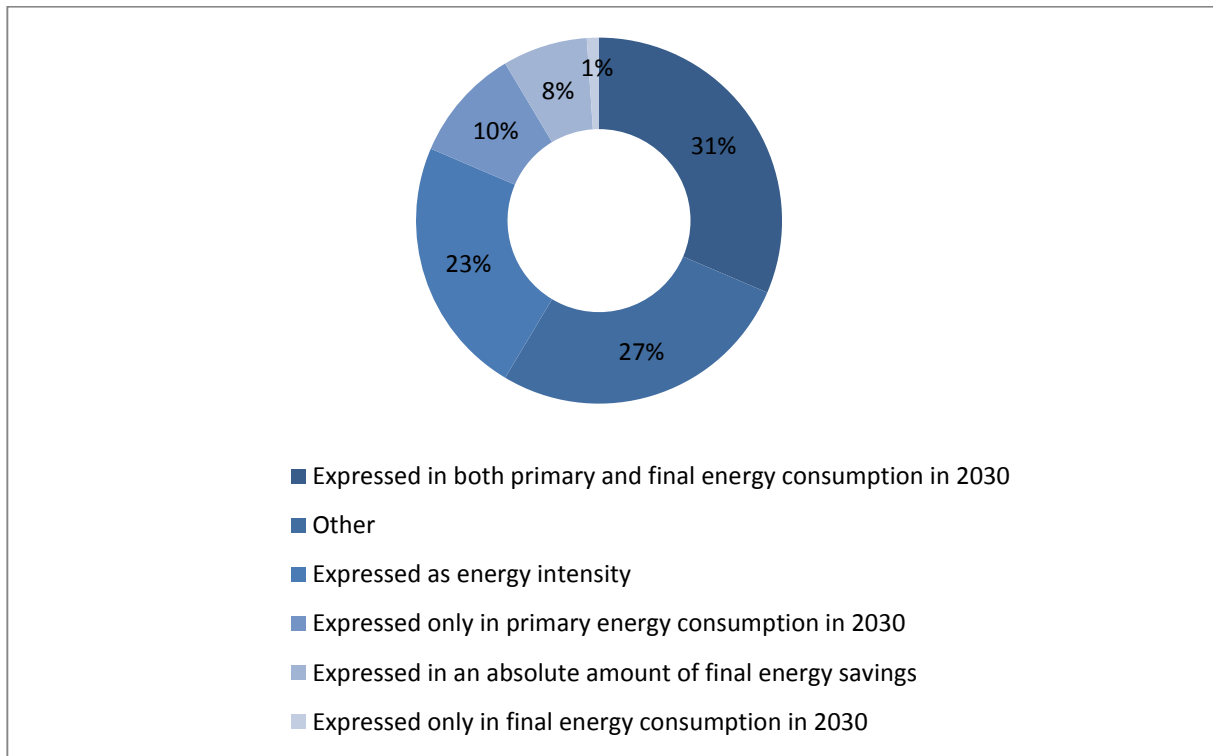
1.7. What is the best way of expressing the new EU energy efficiency target for 2030:

Most participants (31%) expressed the view that the new EU energy efficiency target for 2030 should be expressed in both primary and final energy consumption in 2030, followed by energy intensity (23%), and primary energy consumption in 2030 only (10%). 'Other' included a wide range of proposals, including the following examples:

"Expressed in an absolute amount (Mtoe) of primary energy savings" – Coalition France pour l'efficacité énergétique.

"Energy intensity per functional unit (which will lead to higher performance)" – European Carbon and Graphite Association (ECGA).

"Expressed with an additional CO2 emissions target." – EDF Energy Plc.



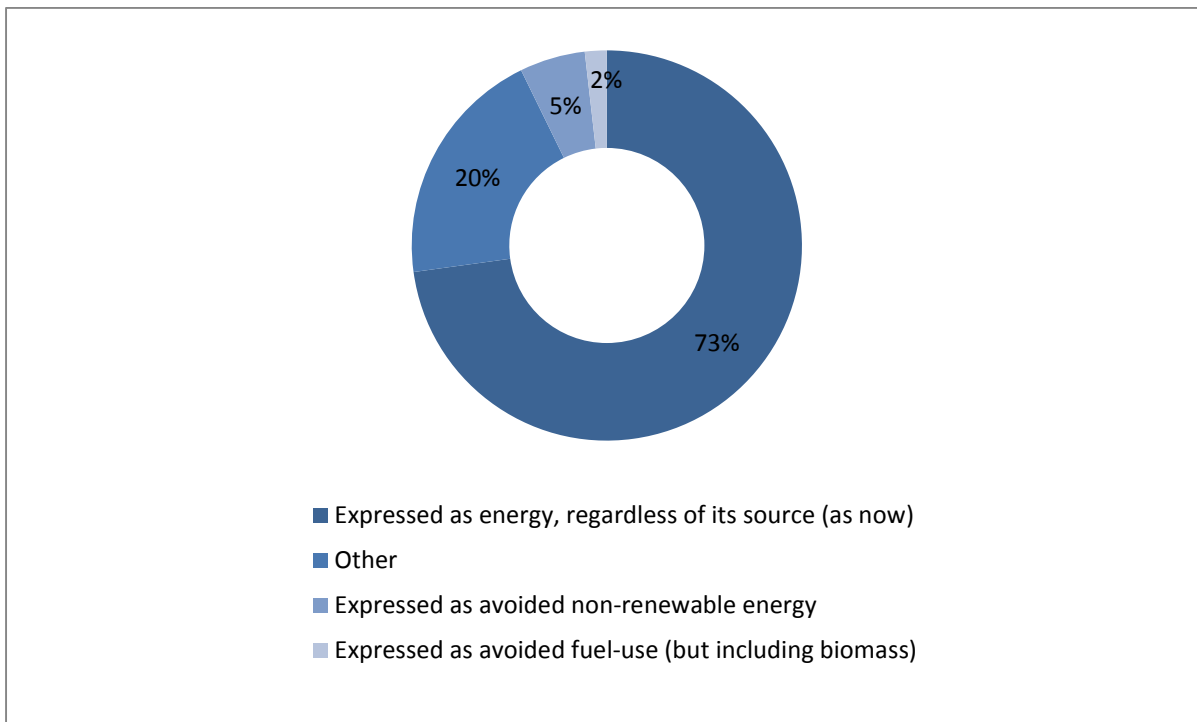
1.8. For the purposes of the target, should energy consumption be:

A very large majority (73%) shared the view that, for the purpose of the target, energy consumption should be expressed as energy irrespective of its sources, as is currently the case. The second largest single view (5%) called for expressing energy as avoided non-renewable energy. 'Other' included a wide range of proposals, including the following examples:

"Expressed in terms of primary non renewable energy avoided" – FUNDACIÓN ASTURIANA DE LA ENERGÍA.

"Final energy coordinated with RES target ensuring that investment in EE cheaper than investing RES" – IBERDROLA.

"Flexibility and subsidiarity is of utmost importance regarding how to express targets" – Norwegian Ministry of Petroleum and Energy.



2. Article 6: Public procurement

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

52% of all participants shared the view that existing EU energy efficiency requirements for public procurement are not sufficient to achieve the needed impact of energy savings, versus 29% who had no view on this and 19% who believed that requirements are sufficient.

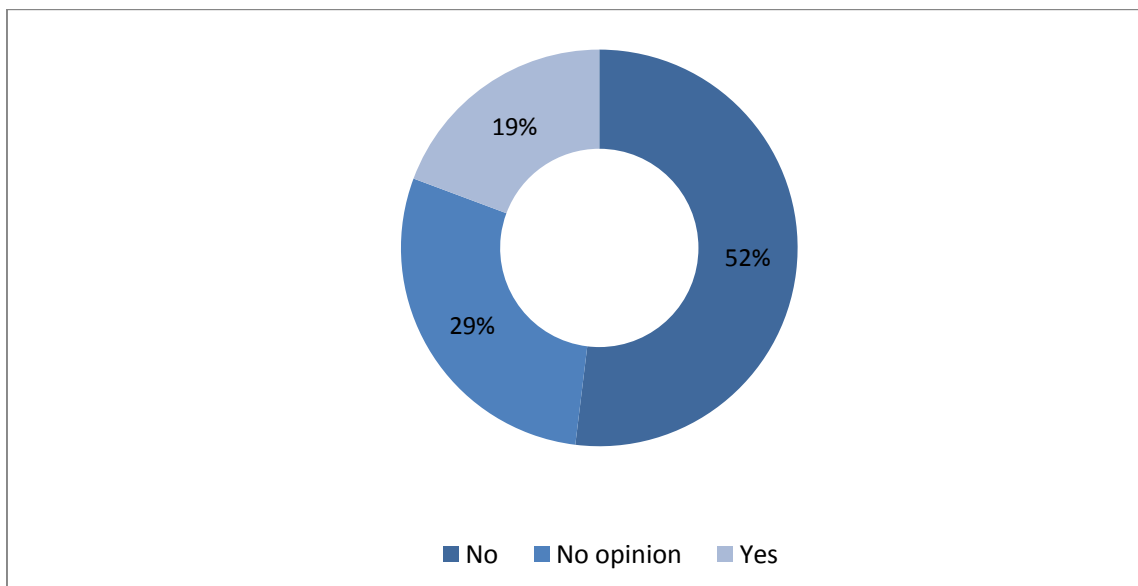
Participants argued that provisions would be sufficient at a Member State level, but that otherwise requirements would be very complicated and difficult to understand. Some also noted that the scope of the requirements would be too narrow, by focusing only on 'central governments'.

Responses included the following passages:

"As noted above, the formulation of requirements in Article 6/Annex III makes it impossible for an individual contracting authority, or even a national expert body, to clearly understand what is required in terms of procurement. [...]" – Abby Semple, EU citizen from the UK.

"On the level of the MS they are sufficient. Higher attention to public procurement will have limited impact to the energy consumption, as the main product and building categories are already adequately addressed in relevant community legislation and/or regulations in MS." – Ministry of Economic Affairs and Communications, Republic of Estonia.

"The article 6 of the EED is restricted to 'central government' purchasing, which is a very narrow scope thereby greatly limiting the EED's impact. Although Member States are supposed to encourage all public authorities to follow similar rules, it is yet unclear whether this has had any effect. [...]" – The European Partnership for Energy and the Environment (EPEE).



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

Several participants noted that the Commission should provide a methodology to better assess the economic value of energy efficient gains. More specifically, when determining which product or service to purchase, authorities should calculate the net present value (NPV) of the product or service, including energy savings. The net present value, in turn, would have to consider the baseline energy consumption and the lifetime cycle of any product or service. Furthermore, several participants shared the view that the public procurement obligations should be extended beyond central authorities, and also apply to local and regional authorities.

The need for more technical assistance was also voiced. Yet further participants argued that any EU funding should be made contingent upon adherence to public procurement obligations. Finally, several participants noted that there should be an obligation to reduce energy consumption, rather than to sustain a certain renovation rate.

Responses included the following passages:

"The requirements should be extended to all public authorities to cover all public contracts, and clear and ambitious energy performance levels should be set (including for new and existing buildings). The process of developing common Green Public Procurement (GPP) criteria for Member States should be enforced by the revised EED. [...]" – Coalition France pour l'efficacité énergétique.

"[...] Full implementation of energy-efficiency public procurement guidelines by local and regional bodies could be part of the ex-ante conditionality for receipt of EU funding." – ROCKWOOL International A/S.

"Public procurement is set always by the lowest price. This is just the opposite signal for performing energy efficiency, and has to be updated for main technically asked parameters. Any energy related/consuming product has to have set a specific energy consumption parameters as mandatory part of public procurement, not only the lowest price. Decrease the administrative burden, if energy efficiency is set at very high standards." – Ministry of Economy of the Slovak Republic.

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

42% of all participants shared the view that there is not sufficient guidance in their country to characterise "energy efficient products, services and buildings", versus 30% who had no view on this and 28% who expressed the view that there is sufficient guidance.

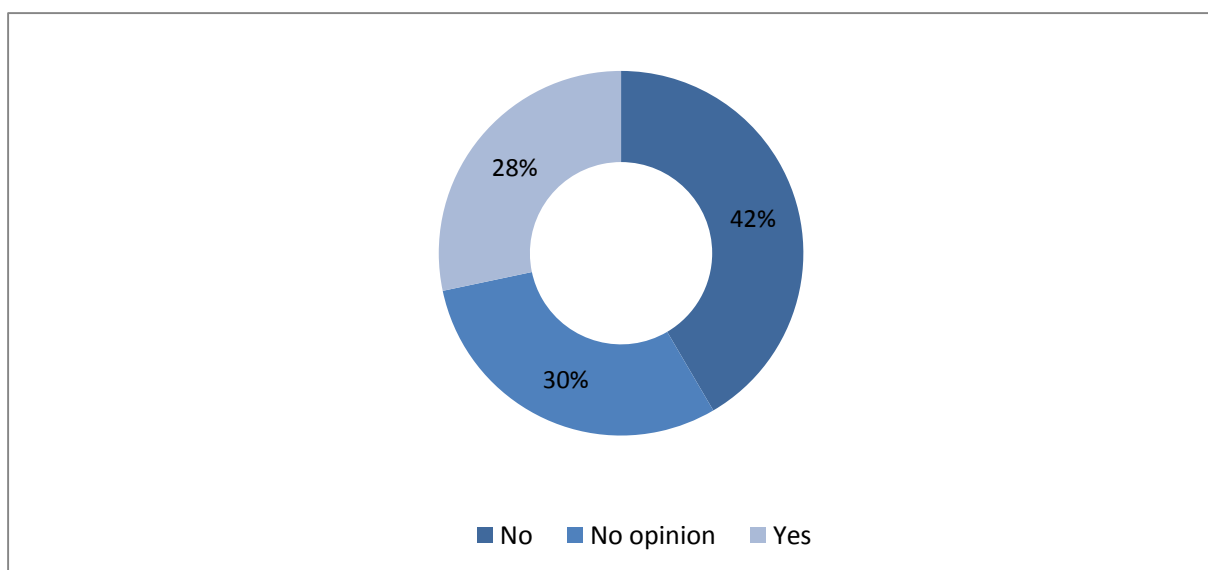
Participants who shared the view that there was not sufficient guidance called for more focus on local capacity building. Many noted that one main barrier to energy efficient public procurement (EEPP) would be a lack of skills and practical know how amongst public procurers. A practical "toolkit" would therefore be particularly helpful to Member State authorities. Overall, there could be more awareness for energy efficiency procurement requirements.

Responses included the following passages:

"The guidance needs improving. While information is available from energy labelling requirements for many energy-using products, very little is available on energy-related products. Further use of energy labelling is needed to provide guidance on energy related products where appropriate. For buildings, in general, more harmonised methodologies and guidance should be considered. Energy Performance Certificates (EPCs) have been introduced along with performance criteria for the different energy classes; however their quality must be improved. The nZEB definition should also be clarified. [...]" – Architects' Council of Europe (ACE).

"On an EU level: Yes and no, energy labelling on consumers product's are well developed via the Eco Design/Energy Labelling directive, but not for buildings or larger products/projects. In the UK In Sweden: A standard (SS 24300) has been developed showing the energy performance of buildings." – Svensk Energi – Swedenergy – AB.

"Yes. Public or semi-public state energy agencies, the nation-wide operating German Energy Agency (dena) and private providers offer a variety of information and tools for the evaluation of processes, the identification of saving potentials and measures as well as their technical and economic assessment. [...]" – Association of German Chambers of Commerce and Industry (DIHK e. V.).



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?

67% of all participants had not seen information campaigns or other public initiatives in an EU country that explain public procurement of energy efficient products, services and buildings, versus 33% who had.

If yes, how useful have they been to increase awareness?

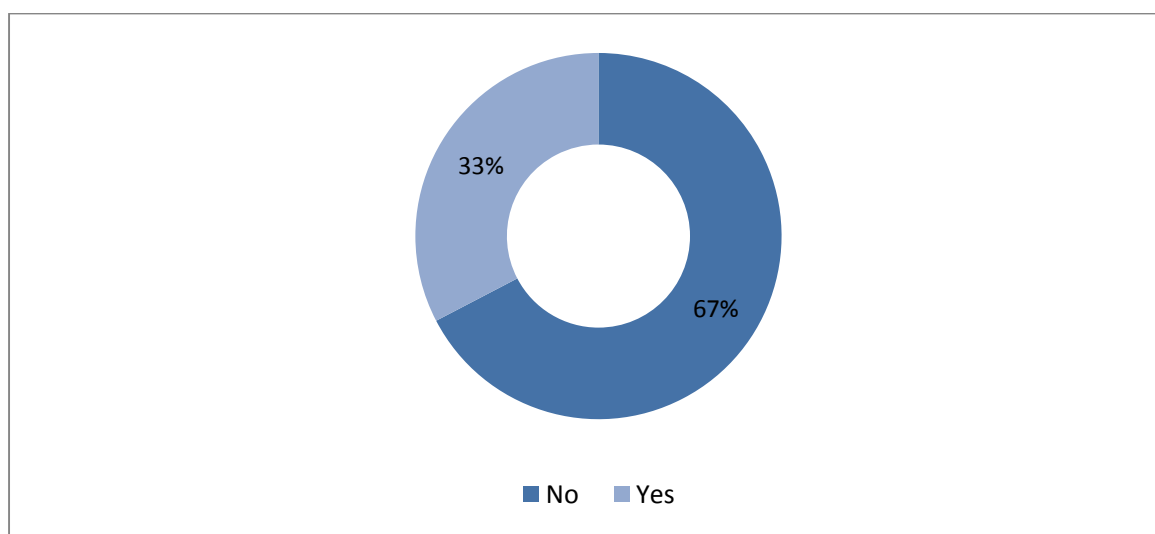
In general, participants shared the view that it would be very difficult to quantify the usefulness of public campaigns to increase awareness. Some, however, noted examples, including campaigns by the Cabinet Office in the UK, the German Energy Agency (dena) and the Federal Centre for Energy Efficiency (BfEE) in Germany, the Association of Finish Communities in Finland, the Sustainable Energy Development Agency in Bulgaria, and the Fund for Environment Protection and Energy Efficiency in Croatia.

Responses included the following passages:

"There is a great need for such information campaigns. Taking in to account expensiveness of such campaigns and limited possibilities of National budgets to finance them, possibility to grant EU financing for this purpose is very important. However, MS should have a sufficient room of manoeuvre to decide on the best methods to promote energy efficiency in public procurement. Therefore, no additional disciplines in the EED are necessary." - Ministry of Economics of the Republic of Latvia.

"The European chemical industry is active in a number of areas including the organisation of events, meetings, briefing sessions and onsite technical visits to installations with other industry sectors, EU institutions and national government representatives. [...]" – Dow Europe GmbH.

"EURELECTRIC has received positive feedback from a few countries on this. A few examples include: In Poland, the National Fund for Environmental Protection and Water Management (NFEP&WM) has carried out actions which raised popular awareness of renewable energy sources [...] In Portugal, the National Energy Agency has carried out workshops in this field. In France, a broad information campaign has been conducted by ADEME in 2015 [...]." – EURELECTRIC.



3. Article 7: Energy efficiency obligation schemes

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?

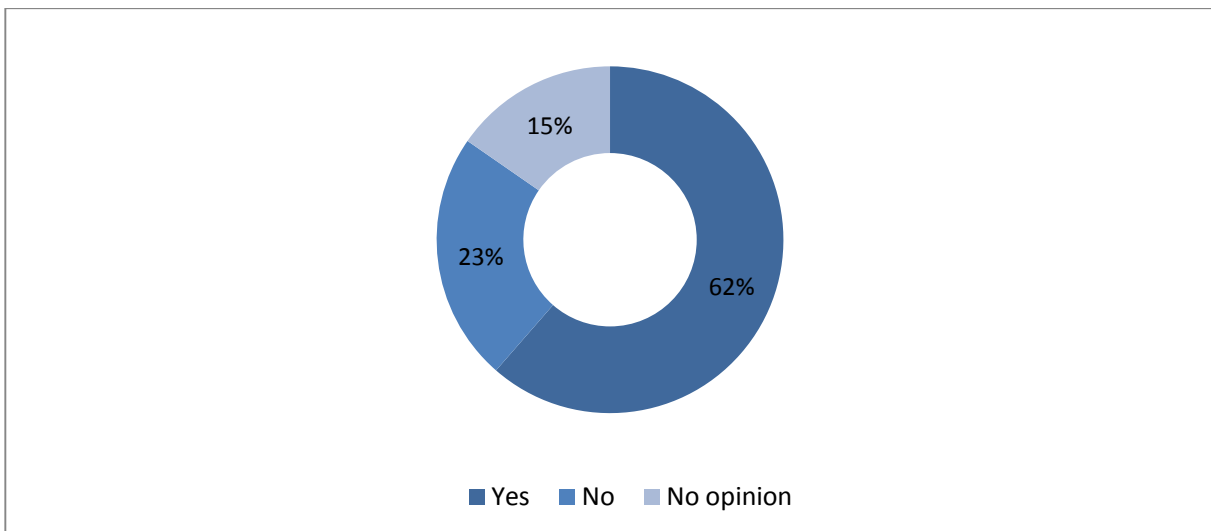
62% of all participants were aware of energy efficiency measures that have been carried out in their country in response to an EEOS, versus 23% who were not and 15% who did not comment. Of those who were aware of measures, participants cited a wide range of activities across the EU.

Responses included the following passages:

"The EED is still being implemented and progress has been slow. Nevertheless, all Member States have submitted their plans of how they are going to implement Article 7. There are 16 Member States that have chosen to develop an EEO to achieve partly or fully the savings required by Article 7 and this is an indication that Member States are investing time and resources into making this work. [...]" – Energy Saving Pioneers.

"Ireland, Denmark and Italy have included behavioural energy efficiency (BEE) programmes in their national portfolio of energy efficiency measures eligible to fulfil the national energy efficiency obligation. [...]" – European Alliance to Save Energy (EU-ASE).

"Yes, of course. Romania has several energy efficiency obligation schemes – the famous of them being those promoted by Regional Operational Program (POR) – Axis 3 – Energy efficiency for residential & public buildings. They are promoted through Regional Developments Agencies (ADRs), but also by the Ministry of Economy." – Energy Commission PNL Cluj.



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

68% of all participants shared the view that Article 7 is an effective instrument to achieve final energy savings, versus 32% who did not.

Of those who viewed Article 7 as an effective instrument, participants explained that it represents the core element of the EED, sets a clear target for Member States, and holds Member States accountable. Participants also noted that Article 7 provides sufficient flexibility to Member States, and stimulates the energy efficiency service market. Several also called attention to Italy's 'white certificate scheme' which could improve Article 7 further.

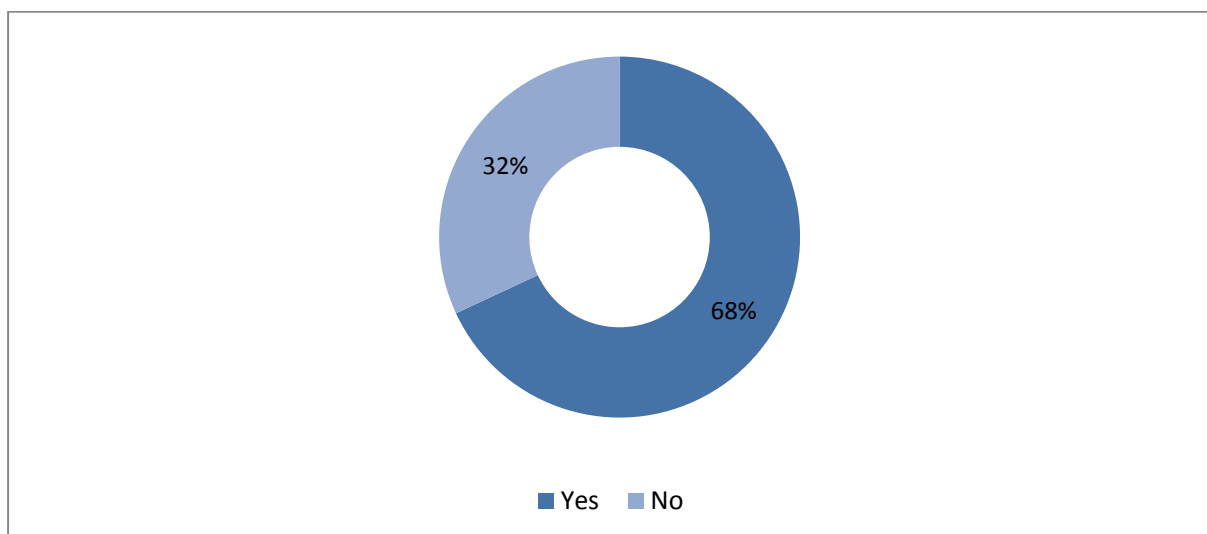
Of those respondents who did not think that Article 7 is an effective instrument, several explained, for example, that although the article would lead to final energy savings, these savings would not necessarily lead to primary energy savings. Furthermore, many also noted that, for EEOSs to function well, there would have to be a strong relationship between customers and fuel suppliers. This would not, however, always be the case. Some also explained that EEOSs would be expensive and overly bureaucratic. Some also argued that Article 7 would not be effective, as certain sectors would already be covered by other mechanisms, such as the EU ETS.

Responses included the following passages:

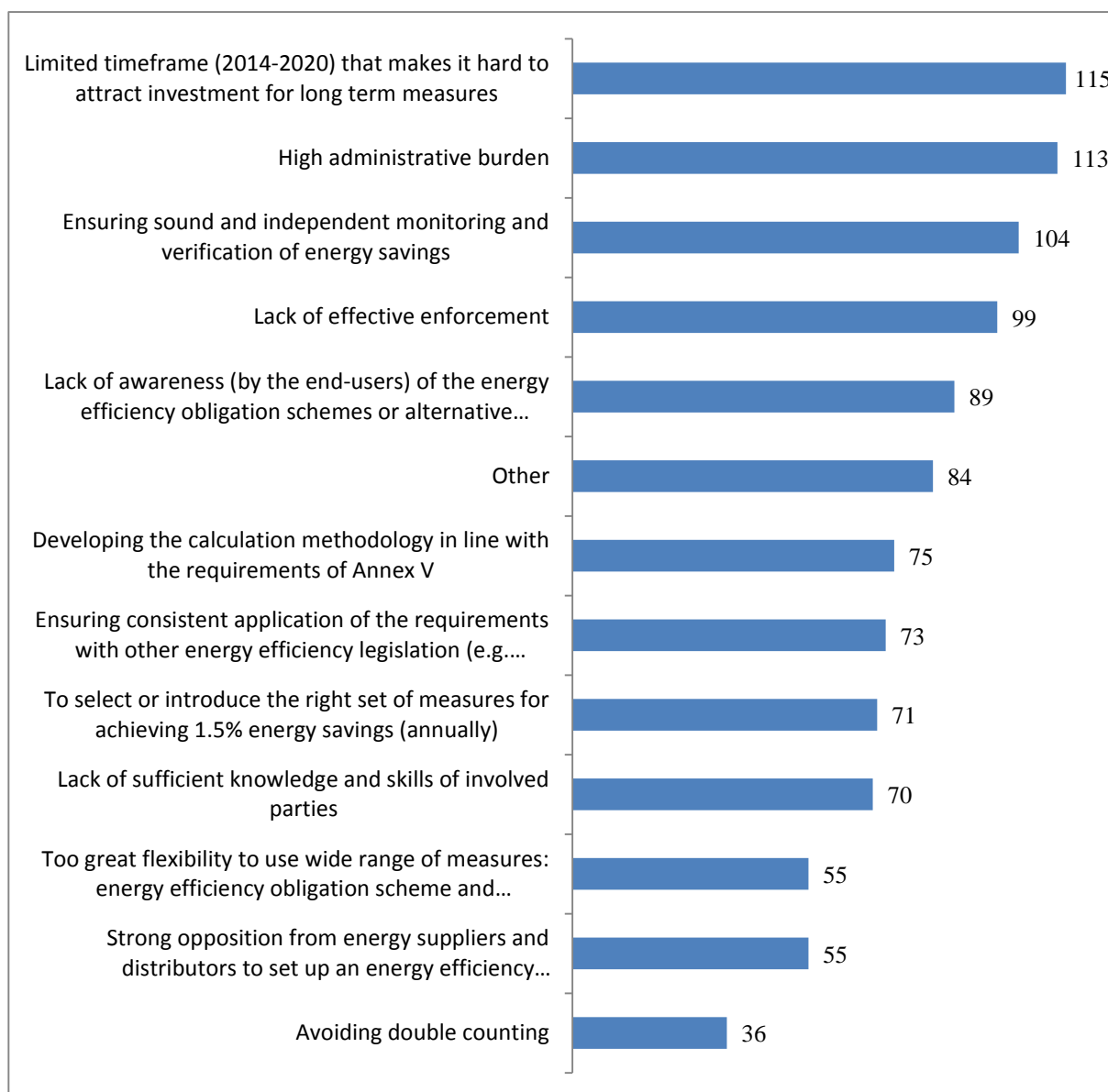
"Article 7 is the core element of the EED. It is a very simple and effective way to make energy savings across the board providing political conditions are right. Although, in Spain cannot be delivered eligible direct technical measures to improve energy efficiency impact." – AFME (Spanish Association of Electrical Equipment Manufacturers).

"A White Certificate Scheme, as implemented in Italy, can be an effective tool to exploit the energy efficiency improvement margins." – FEDERCHIMICA.

"We are not fully convinced if obligation schemes (EEOS) are an effective instrument as practical experience in this area is limited. As we already had national EE policy measures in place, abrupt transition to EEOS may bring negative impact to the continuity of existing policies and has questionable added value.[...]" – Ministry of Economic Affairs and Communications, Republic of Estonia.



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.



The five main challenges identified by participants were 'limited timeframe (2014-2020) [...]' (115), a 'high administrative burden' (113), 'ensuring sound and independent monitoring and verification of energy savings' (104), 'lack of effective enforcement' (99), and 'lack of awareness (by the end user) of the energy efficiency obligation schemes or alternative measures' (89).

The option 'Other' included a wide range of proposals, including the following examples:

"Financing availability" – ENGIE SA.

"The focus should be on savings not in the methods and new confusing directive conclusions." – Finnish Forest Industries Federation.

"Too little harmonization throughout the EU and too little planning security." – Federation of Austrian Industries.

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

56% of all participants disagreed (39%) or strongly disagreed (18%) that the current 1.5% savings level is adequate, versus 23% who did believe that it is adequate. 17% had no view. Merely 3% strongly agreed that the 1.5% level is adequate.

Amongst those who thought that the level was not adequate, some participants criticised that energy efficiency gains could not practically increase in linear terms. Exponential targets would be much more realistic. Some also argued that energy suppliers would be the wrong target altogether, as they would neither generate nor consume energy. Yet further stated that the target would be too low, given that the natural rate of energy efficiency gains would be at around 1%. Additionally, participants noted that there would be no "one size fits all" solution for all Member States, and that Member States should be allowed to set their own savings targets.

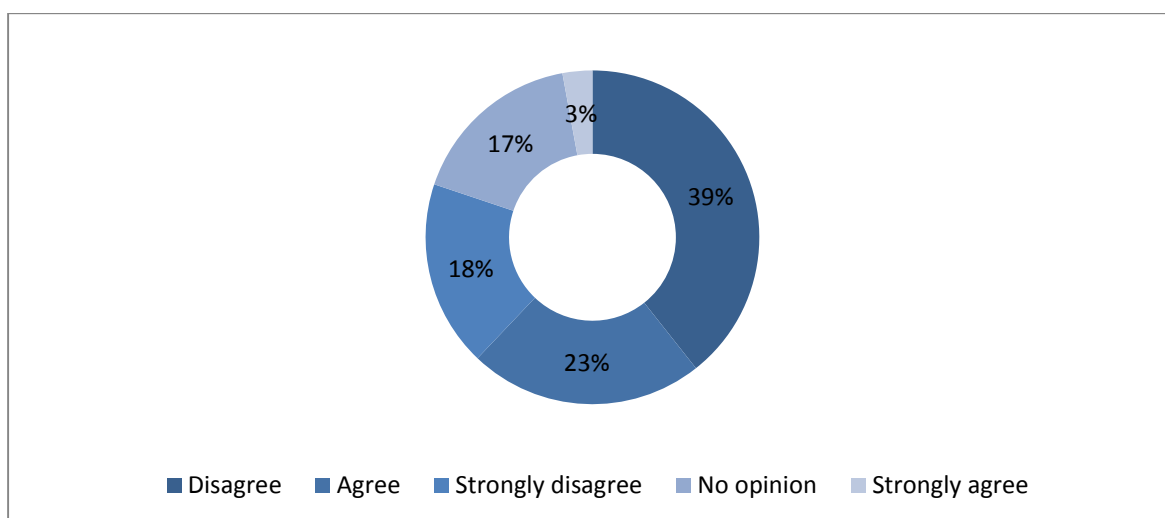
In contrast, some also noted that evidence from the Coalition for Energy Savings suggests that presently only about 0.8% energy savings are achieved every year, and that the Commission should therefore focus more on effective enforcement of the Directive. Finally, some argued that while the 1.5% requirement had been adequate during the time the Directive was designed, it would no longer be adequate given, for example, the more ambitious climate goals as a result of the COP 21 climate agreement at the end of 2015.

Responses included the following passages:

"The exemptions introduced during the legislative process are reducing the savings to be achieved under Article 7. At least 1.5% savings every year should be achieved." – Verband Beratender Ingenieure VBI.

"Interesting question. One can only answer that 1,5 % is ok or far too low. Our answer is that annual 1,5 % is really high. The Commission's analysis and progress report on the situation actually confirm this. [...]" – Energy Authority of Finland.

"Assuming that article 7 is extended until 2030, we hold the view that towards the end of this period the cost for achieving a 1.5% energy saving per annum will substantially increase (MAC curve). [...]" – Italcogen-ANIMA – Italian Association of CHP System Manufacturers & Distributors in ANIMA federation.



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

Views were mixed on whether energy efficiency obligation schemes (EEOs) should have specific rules about energy savings for vulnerable consumers: 35% shared the view that they should not have such rules, versus 30% who stated that they should. 35% voiced no opinion.

Those in favour of EEOs addressing vulnerable consumers called attention to the benefits that reduced energy costs can have for less economically well-off households. Some argued that expenditure for energy per household would be regressive, as poor households would have to spend a larger proportion of their income on energy. This regressivity could be mitigated, for example, through subsidised energy efficiency measures for vulnerable consumers.

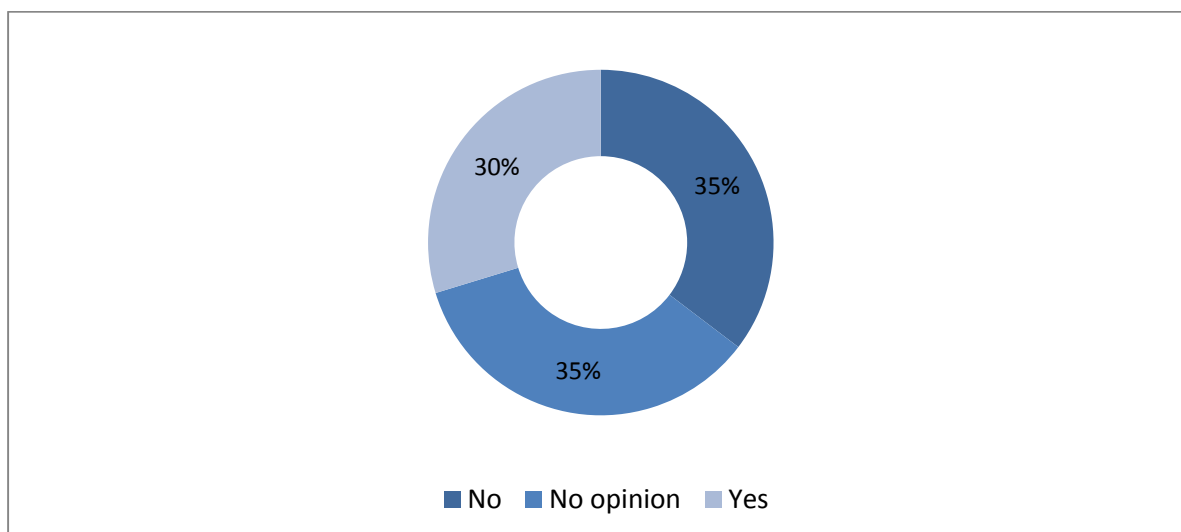
There were several arguments, however, against EEOs to have specific rules about energy savings for vulnerable consumers. Several participants argued that the aim should be to reduce the energy consumption of everyone, not only of specific income groups. EEOs should not discriminate between different types of consumers. Furthermore, several respondents shared the view that energy poverty should be addressed by welfare policies, not energy policies, enacted at a Member State level. Finally, Member States would define 'vulnerable consumers' differently, which is why it would lead to additional confusion if EEOs were to address them.

Responses included the following passages:

"Due to low incomes, increasing energy prices and often poorly insulated houses, nearly 11% of EU citizens were unable to adequately heat their homes in 2012. The Commission should collect more data to assess whether and how best to address vulnerable consumers via the EED. [...]" – AIMCC: Association française des industries des produits de construction.

"Addressing the problem of vulnerable consumers is the responsibility of the Government and should not be mixed up with a general energy efficiency obligation scheme. [...]" – European Council for an Energy Efficient Economy (ecee).

"Issue of vulnerable consumers should be addressed by social security measures, it is not justified to set up duplicating structures to work with vulnerable consumers." – Ministry of Economics of the Republic of Latvia.



4. Article 9-11: Metering and billing

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)?

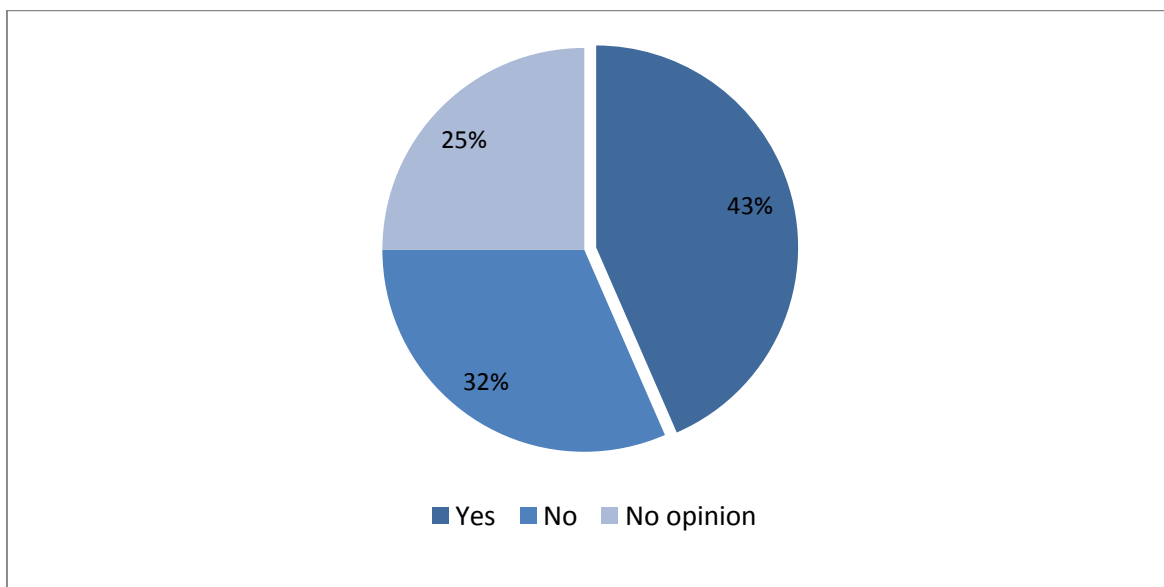
43% of all participants shared the view that think the EED provisions on metering and billing are sufficient to guarantee all consumers easily accessible, sufficiently frequent, detailed and understandable information on their own consumption of energy, versus 32% who opposed this view, and 25% who had no view. Most comments were provided by participants who did not think that the provisions are sufficient. Many argued that energy bills would remain too complex to be properly understood by most customers. Furthermore, certain energy bills would be provided only once per year, which would not suffice to incentivise behavioural change. Yet others called attention to the possibility that suppliers are exploiting conditionalities of the articles, so as to avoid having to provide individual metering. Finally, several participants also called for more live energy consumption data, which could be expressed in terms of Kilowatt hours and Euros.

Responses included the following passages:

"Consumers in many countries still find energy bills unclear, confusing and not timely enough to adapt their consumption pattern. Energy bills should be well-structured and accurate. Consumers equipped with smart meters should have the right to frequent, accurate bills. [...]" – Coalition for Energy Savings.

"Overall, yes. However the conditionality may be used in many cases by the energy suppliers to avoid introduction of individual metering (e.g.: for district heating for individual consumers from a block of flats)." – FEDARENE _ European Federation of Agencies and Regions for Energy and the Environment.

"Die Informationen auf den Rechnungen für elektrische Energie und Gas sind sehr umfangreich und detailliert. Nach Einführung der Smart Meter (Elektrizitätsbereich) werden diese Informationen noch besser einsehbar und verwertbar sein. Die derzeitigen Regelungen sind dafür ausreichend." – Federal Ministry of Science, Research and Economy (BMWFV) of Austria.



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?

61% shared the view that it is appropriate that the requirement to provide individual metering and frequent billing is subject to it being technically feasible and/or cost effective, versus 27% who had no view and 12% who opposed this view.

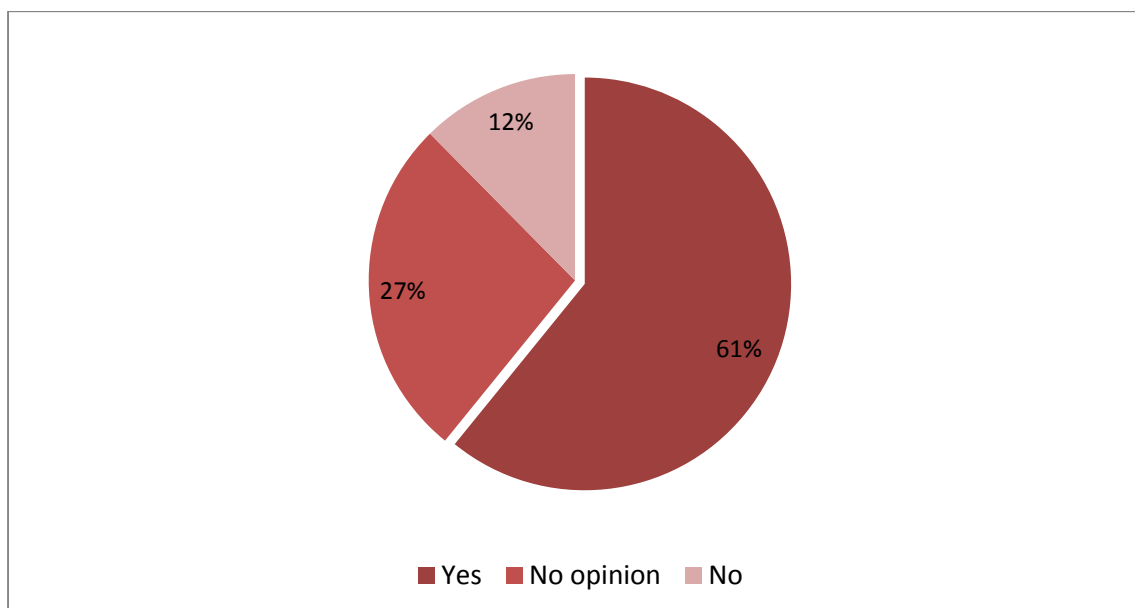
Many participants explained that technical feasibility and cost effectiveness would have to be evaluative criteria for any policy measure. Several also noted, however, that such provisions present loopholes and enable certain actors to circumvent the legislation.

Responses included the following passages:

"The criterion of "technically feasible" seems redundant, since smart metering systems are being rolled out worldwide. The technology is available, adaptable to various geographic and building conditions. "Cost effectiveness" needs to be more clearly defined. It should not depend on the amount of energy/money an individual consumer can save, but rather the benefits it brings to the whole system as well as the cost of not implementing the technology. [...]" – ORGALIME – The European Engineering Industries Association.

"For the installation of a smart meter, the benefits for the consumer have to be higher than the cost of the meter, especially since it is an enabling technology to help save energy rather an end goal in itself.[...]" – Bund für Umwelt und Naturschutz Deutschland e.V. Friends of the Earth Germany.

"Cost-effectiveness is unfortunately one of the loopholes for Member States for non-transposition. Example: Although EED has - more or less clearly - stated in Art 9 (3) that for heating the use of heat cost allocators is basically always deemed to be "cost-effective", some Member States put even this into question [...]. A future EED revision should close this gap by expressly including a rebuttable presumption that within the scope of Art 9 (3) the use of heat cost allocators on systems equipped with radiators are always deemed to be cost-effective." – Deutsche Unternehmensinitiative Energieeffizienz e.V. (DENEFF).



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

47% stated that such conditions of being technically feasible and/or cost effective should not be harmonised across the EU, versus 31% who had no view on this. Merely 22% shared the view that such conditions should be harmonised.

Many participants noted that conditions such as technical feasibility and cost effectiveness would vary widely across the EU. In order to assure a market-based approach, such conditions should therefore not be harmonised. Additionally, some highlighted the danger that once IT requirements would be harmonised, then this would expose the corresponding IT infrastructure to additional attacks and threats. That being said, several also noted that the Commission should provide technical advice. Furthermore, some also explained that harmonisation will become more important as the Energy Union advances, yet that it would remain too early to pursue such harmonisation at this stage.

Responses included the following passages:

"As Europe moves towards a fully functional internal energy market, this will probably need to be considered eventually but for the moment, it may cause unnecessary delays and difficulties to implement, given the different national circumstances at the Member States level." – Inter-Environnement Wallonie.

"Absolutely not. The great advantage of the present directive is that it allows for the implementation of market tailored solutions. If we harmonise the conditions to assess the safeguards we will not be able to take into account all market characteristics. These could rather impede the implementation of the directive." – Union Internationale de la Propriété Immobilière.

"A harmonisation or a common understanding of technical feasibility and/or cost effectiveness would contribute to legal security, as at the moment we are confronted with a patchwork of conditions. Standard harmonisation helps to overcome this barrier. For example, heat and domestic hot water metering according to EN1434 is today cost-effective and feasible. And various manufacturers in the EU integrate it." – European Heating Industry Association – EHI.

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

64% had no opinion, versus 22% who replied 'Yes' and 14% who replied 'No'.

A sizable number of participants noted that a "How" question cannot be answered by 'Yes' or 'No', which is why many participants provided qualitative input as to how such conditions affect the potential for energy savings.

Some participants noted that such conditions must be able to differentiate between different target groups. Smart meters, for example, may not make any economic sense for households which do not consume a lot of energy in the first place. Furthermore, such conditions may increase awareness for and acceptance of energy efficiency measures. Yet others called for more transparency. Conditions such as technical feasibility or cost effectiveness would have to be comparable across Member States.

Responses included the following passages:

"The availability of real time consumption data would truly empower consumers. As stated in the answer to 4.2, the criterion of "technically feasible" is no longer an issue. If there were harmonised criteria for "cost effectiveness" across the EU, all European citizens could benefit from the technology." – ORGALIME - The European Engineering Industries Association.

"The key challenge is how to raise awareness about consumption patterns to increase households' energy savings. Potential benefits for citizens, as well as, costs that may be passed onto them during or after the roll-out need to be carefully considered. [...]" – Energy Cities.

"They offer a "get-out" to Member States, allowing them to argue against their installation. More transparency on sharing information and more convergence between Member States on how information is stored would allow easier comparability, and therefore permit more energy efficiency actions to be undertaken. More energy savings means more benefits for the consumers, who will be empowered. This would be in line with the Energy Union thinking, as it is placing the consumer at the centre." – EuroACE (European Alliance of Companies for Energy Efficiency in Buildings).

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 together provide a sufficient level of harmonisation at EU level?

37% shared the view that the EED requirements regarding smart metering systems for electricity and natural gas and consumption feedback and B) the common minimum functionalities recommended by the Commission together provide a sufficient level of harmonisation at EU level. 36% had no view, and 27% did not think that these provisions would provide a sufficient level of harmonisation.

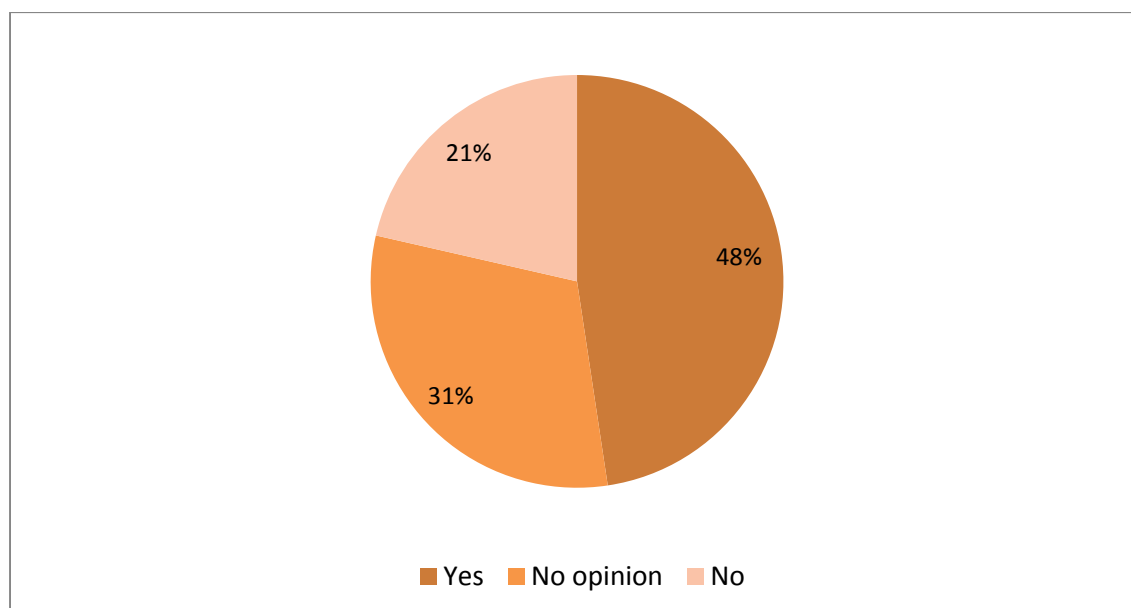
Several participants explained that smart meters would have to provide more useful information to consumers, potentially in 15 minute intervals, or even in real time. Some also suggested that consumers could receive a notification once every three months with an overview on whether they are saving energy and hence money, or whether they are consuming more than would be expected. Yet others noted that the above factors largely depend on market conditions, and on how providers interact with customers. In general, many participants shared the view that EU standards should only apply to minimum ones, as any additional standards could significantly increase the enterprise's complexity. Additionally, several stated that harmonisation must also take into account acceptance by citizens. Finally, some also cited evidence that calls the effectiveness of smart meters in general into question.

Responses included the following passages:

"The annual ACER/CEER Market Monitoring Report 2014 already noted a lack of minimum technical functionalities and other requirements for smart meters in many Member States. [...]" – Deutscher Naturschutzring.

"Yes. It is correct to harmonize at EU level only minimum requirements. For additional requirements, the preconditions in the Member States are too different." – UEPC.

"Smart meters functionalities should also address the issues of dynamic pricing and flexibility (of demand and production). They should also ensure the proper design to fit with the auto-consumption framework that includes demand response, decentralised production and storage." – EDORA.



If no, do you think the common minimum functionalities should be the basis for further harmonisation?

Of those 27% who think that A) the EED requirements regarding smart metering systems for electricity and natural gas and consumption feedback and B) the common minimum functionalities, recommended by the Commission together do not provide a sufficient level of harmonisation at EU level, 48% share the view that common minimum functionalities should be the basis for further harmonisation. 31% had no view, and 21% did not think that common minimum functionalities should be the basis for further harmonisation.

Some called for additional minimum functional standards to the current ones, for example, monthly or three monthly electronic feedback for consumers on how much energy they are saving. Some participants also argued that the interface of smart meters should be standardised, to facilitate their use. Yet others voiced a shared perception that standards across the EU would be overly determined by utilities.

Responses included the following passages:

"If we would like to see the competition between the applications targeted to the consumers, similar criteria across the Member States should be ensured. The applications developed in a small Member State can access the market in other regions only if this is facilitated by the regulation, the processes and input data are comparable or similar." – Ministry of Economic Affairs and Communications, Republic of Estonia.

"Measures like a monthly or three monthly electronic feedback to the consumers whether they are saving or over consuming energy should be among the common minimum functionalities." – Provincie Drenthe.

"The annual ACER/CEER Market Monitoring Report 2014 already noted a lack of minimum technical functionalities and other requirements for smart meters in many Member States. Furthermore, in its 2014 report, "Benchmarking smart metering deployment in the EU-27", the Commission found that only eight from the sixteen Member States planning a smart meter roll out will fully deliver the functionalities as recommended in Recommendation 2012/148/EU. Therefore, enforcement of the relevant provisions should be more stringent, and further coordination at the EU level is needed.[...]" – ZERO – Associação Sistema Terrestre Sustentável.

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?

The two obstacles mentioned by most participants were cost-effectiveness, and consumer acceptance. In many Member States a large scale introduction of individual meters would still be very expensive, and a significant number of consumers would be generally sceptical. Some participants also called attention to a lack of guidance by the Commission on how to conduct life cycle cost analyses, which would be an additional barrier. Yet a further obstacle mentioned by a sizeable number of participants was concerned about cyber security. A large scale roll out of smart meters would require high data protection and security standards. Many participants cited one Member State as an example of how this cyber security obstacle could be overcome, where consumers may refuse to have a smart meter installed but remain responsible for providing reliable data to their utility.

Responses included the following passages:

"In 2009 in the Netherlands, the Senate blocked the initial law for the introduction of smart meters because of privacy and cyber security concerns. These concerns have been addressed in a revised law by providing an 'opt out' for citizens and by setting clear requirements on access and use of the data. Citizens can refuse to have a smart meter installed or a smart meter will be installed, but the functionality of online reading of energy consumption is disabled. In both cases, the citizen is responsible for providing accurate energy consumption data to the utility. [...]" – Climate Alliance.

"Balancing the trade-offs between data security, economic efficiency and acceptability by the end users is the basic dilemma that national authorities need to address when determining the framework for deployment of individual meters that accurately reflect the final customer's actual energy consumption. High data security standards go along with high costs. [...]" – bne (Bundesverband Neue Energiewirtschaft e.V.): German Association of Energy Market Innovators.

"Cost-effectiveness/consumer-acceptance are obstacles to successfully introduce individual meters. Some MS attempt to deliberately use too high cost assumptions to avoid EED transposition. [...]" – ista International GmbH.

5. Article 20: Finance

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

Participants presented a wide range of financing mechanism to significantly increase energy efficiency investments in view of the 2030 target. These included direct subsidies for energy efficiency investments; sufficiently large project to attract private investment; long-term loans for the infrastructure and building sectors as low interest rates; further technical guidance, especially for SMEs; a stable investment outlook; ambitious national energy efficiency targets; greater harmonization between and across EU funding packages, such as European Structural and Investment Funds, the Horizon 2020 initiative and EU ETS revenues; more public-private partnership projects; adherence to the "energy efficiency first" principle when assessing ETS revenue investments; one-stop approaches in Member States; public guarantees for private investments; and the sharing best practice examples across Member States.

Responses included the following passages:

"The problem is not that there is lack of availability of finance as such but instead, that the European private property owners have difficulty in accessing the available finance as there is a lack of tailored funding mechanisms, notably for the small-scale energy efficiency renovation. On top of that, there is a more systemic problem residing in the fact that in the private housing sector, there is not yet a proven link between the energy efficiency of a property and its capita or rental value." – Union Internationale de la Propriété Immobilière.

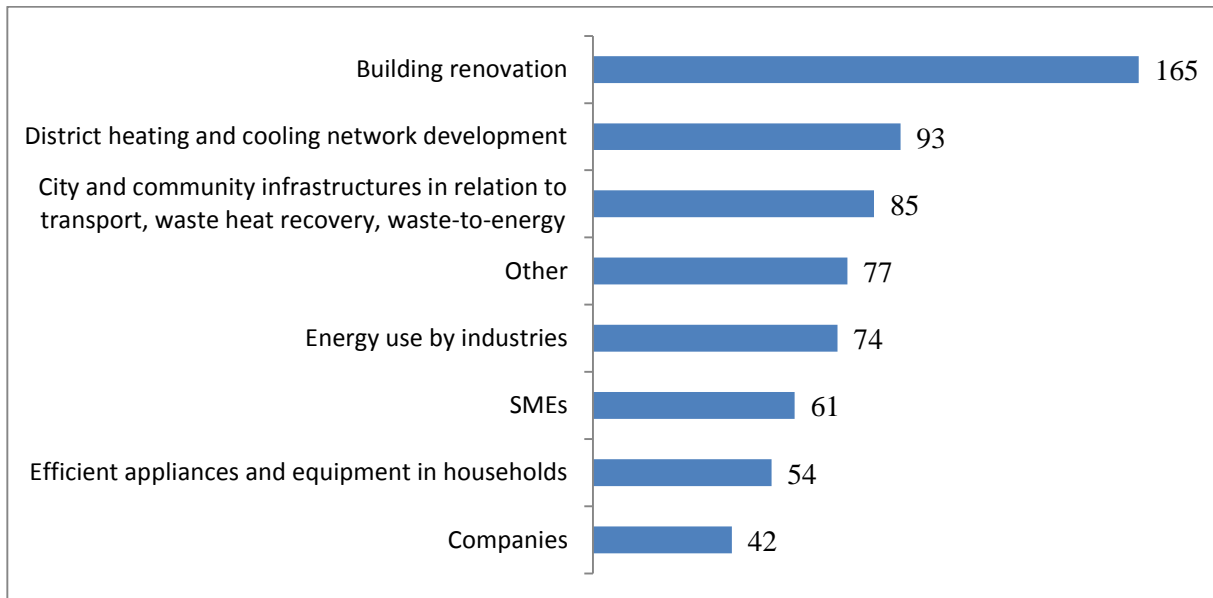
"In view of the 2030 targets, development / incentive programs like the German KfW-Programm are quite successful to promote energy efficiency measures in new and existing buildings. Such programme should be complemented by tax deduction schemes for efficiency measures in privately owned buildings – especially in existing buildings – to provide a direct push for such energy efficiency measures." – European Heating Industry Association – EHI.

"Subsidies in some form. The question is then how much an individual MS can afford to spend, how expensive the investments are and what is the pay back time. One obstacle has been the EU-rules on state aid, traditionally more against than supporting energy efficiency." – Energy Authority of Finland.

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

82% agreed that there should be specific provisions aimed at facilitating investment in specific areas of energy efficiency, versus 12% who opposed this view and 6% who had no view.

If yes, specify your answer from the below list:



Of those who voiced the view that specific areas should be targeted, the three most prominent sectors were 'building renovation' (165), 'district heating and cooling network development' (93) and 'city and community infrastructure in relation to transport, waste heat recovery, waste-to-heat' (85).

The most prominent 'other' sector specified by participants was 'transportation'. 'Other' covered a wider range of further sectors, including the following examples:

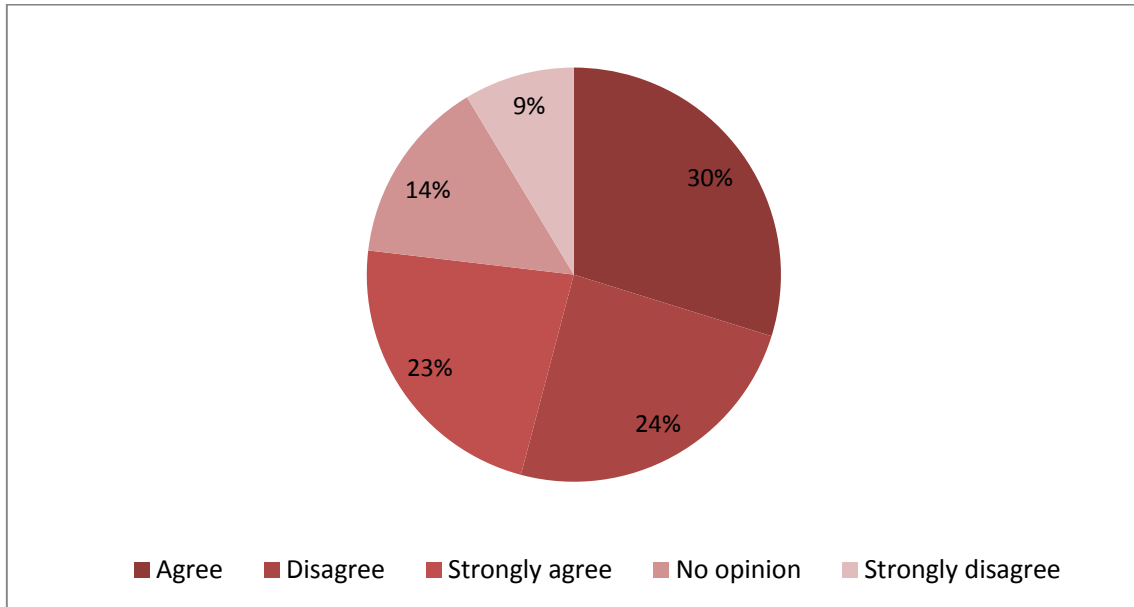
"Existing buildings: low-income consumers will struggle with high costs" – ANEC.

"Transport sector: e-mobility and other more efficient technologies" – Vattenfall AB.

"There is a need for simplified access to EU funding in general" – Coalition France pour l'efficacité énergétique.

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.

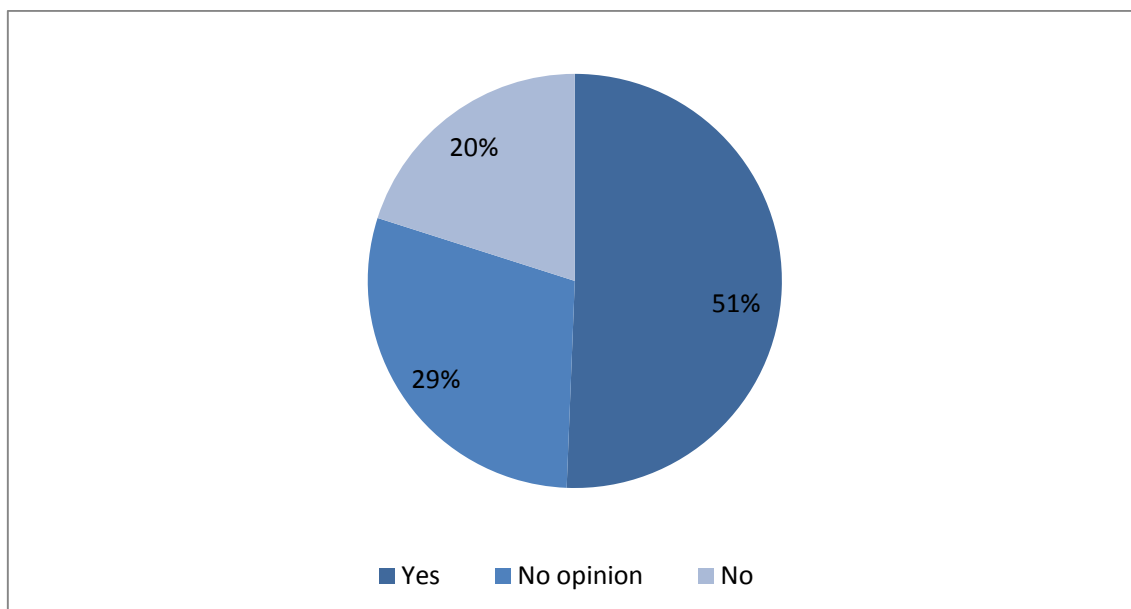
53% either agree (30%) or strongly agree (23%) that one way to increase the impact of energy efficiency investments could be through making the energy performance/savings monitoring mandatory under Article 20 whenever public funds/subsidies are used for EE investments, versus 33% who either disagreed (24%) or strongly disagreed (9%) with this statement. 14% had no explicit opinion.



6. Article 24: Monitoring

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?

51% thought 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, versus 29% who had no view on this and 20% who opposed this view.



If yes, why is it a useful tool?

Amongst those 51% who thought that the present system is a useful tool, many explained that the system would incentivise Member States to "stay on track" and comply with existing legislation. Many also stated that the system would lay the foundation to monitor progress and thereby enable further progress. It would also make it easier to compare progress across different Member States, and lead to more transparency.

Responses included the following passages:

"It facilitates the monitoring of progress in implementing energy efficiency policies and increase transparency and comparability." – Climate Action Network Europe (CAN Europe).

"It puts pressure on Member States and obliges them to have a holistic overview of their effort, including legislative and financial efforts. This monitoring could be used by the Commission to do some naming and shaming and share best practice examples." – Union Internationale de la Propriété Immobilière – UIPI.

"Generally, EURELECTRIC believes that the National Energy Efficiency Action Plans (NEEAPs) have been very useful in monitoring and reporting." – EURELECTRIC.

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

Amongst those 20% who did not think that the system is a useful tool, several noted that already existing data, collected for example under the reporting obligation of the EU ETS should be used more. Participants furthermore noted that there is need to streamline the data and create a standardised reporting template for Member States.

Some questioned the value of the reporting system, as it would overly rely on declarations by Member States. Instead, the system should be based on independent data. Others also called for a better integration of the current system with data from Eurostat.

Responses included the following passages:

"It needs to be streamlined and consolidated into one or two reporting templates, harmonised by the Commission, agreed by MSs, with an advice and consent process carried out by the Commission or agencies designated by the omission. The consolidated template(s) would preferably be taken out of the EED and placed in a Regulation." – European Council for an Energy Efficient Economy (ecee).

"The use of energy can vary very much from year to year due to different climate conditions. Adjustment for climate conditions using heating degree days could be applied to be closer to reality and control real progress." – Göteborg Energi AB.

"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. [...]" – European Association of electrical contractors.

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?

51% had no view on whether the reporting of national indicators of the EED should be simplified. 33% shared the view that the indicators should be simplified, versus 16% who thought that they should not be simplified.

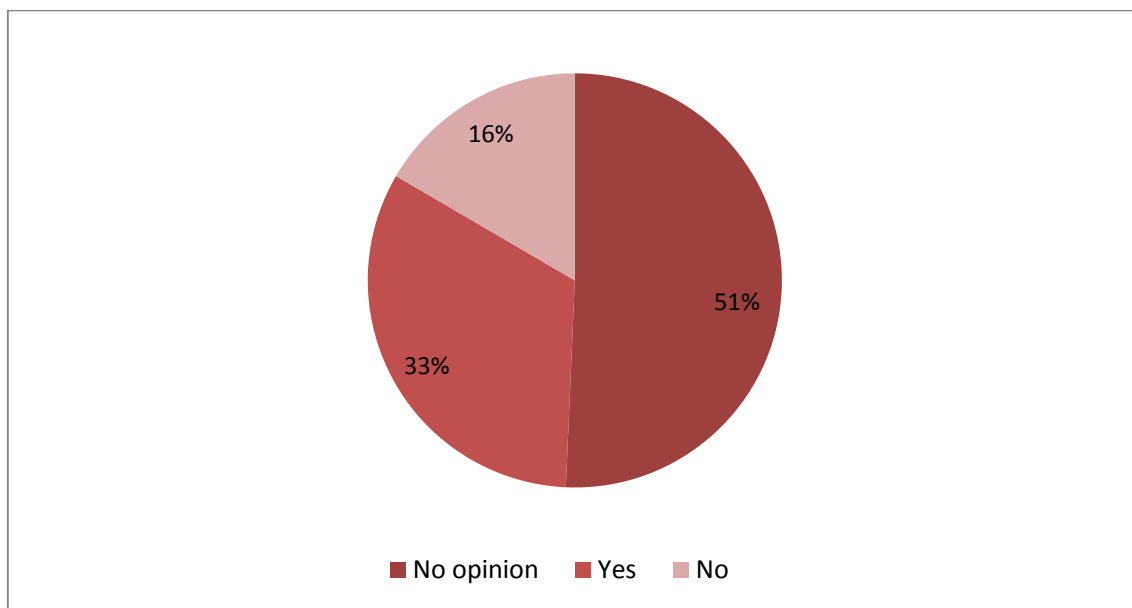
Of those who had a view on whether the indicators should be simplified, several noted that the indicators should be available on Eurostat. Furthermore, certain indicators, for example on CHP, would be lagging behind data availability. Simplifying the indicators would be welcome, as some figures would remain difficult to understand. Some participants also noted that the indicators would currently be biased towards certain sectors. If the data entry would be simplified, then this would also increase the quality of the data. Duplication of data should be avoided. The indicators should be covered by the new governance system. Finally, several participants also called for a binding and standardised reporting template, to increase transparency and comparability across Member States.

Responses included the following passages:

"A binding and standardised template for reporting would make reporting easier, more transparent and comparable, thus allowing developments and implementation of energy efficiency policies to be more easily and effectively tracked. Standardised energy data, definitions and indicators should be used to increase transparency and provide clarity." – PU Europe.

"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." – The Norwegian Association of Electrical Wholesalers, Manufacturers and Producers (EFO).

"Definitely yes. Official data available at EU level should be made "automatically" available to Member States for their mandatory reporting, as a "predetermined value" for their key indicators, which they can comment/correct (keeping such subsidiarity is of prior importance to ensure their commitment in the system). [...]" – Belgian Federal and Regional Ministries.



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?

45% had no view on whether additional indicators are needed to better monitor Member States' progress towards their targets. 33% shared the view that additional indicators are needed, versus 22% who opposed this view.

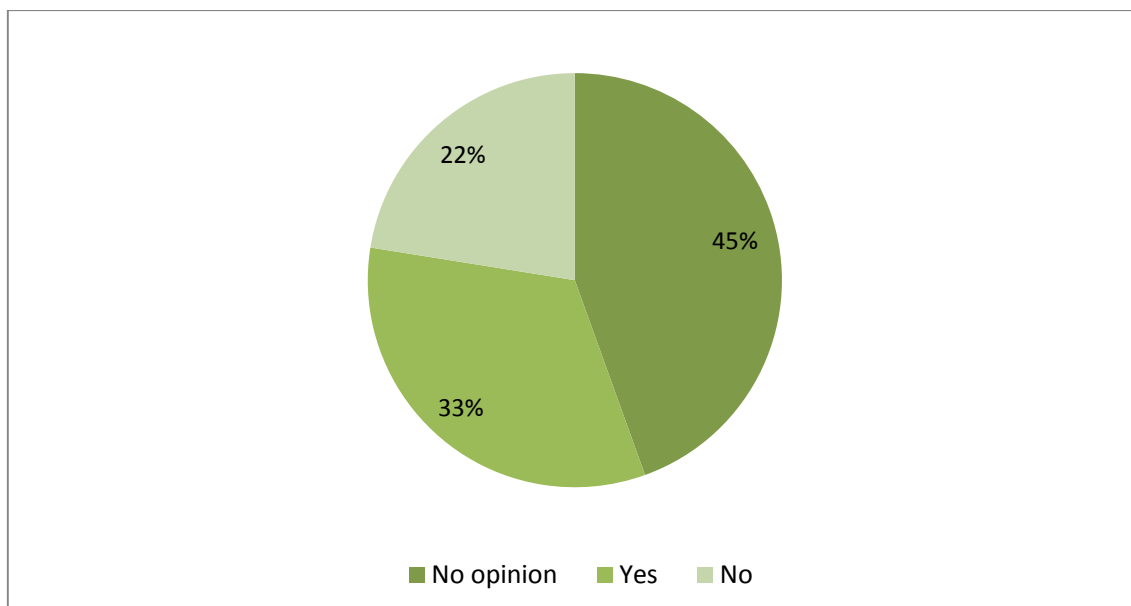
While some participants warned that the current indicators would be sufficiently complex at the moment, others gave examples of potential new indicators. These included, for example, the extent to which smart meters are used for grid operations; the amount of public and private investments into energy efficiency; the number of jobs created thanks to energy efficiency; the health and air pollution costs avoided thanks to energy efficiency; and actual heating degree days to adjust data to varying climatic conditions. Many participants stated that such additional indicators could highlight the multiple benefits of energy efficiency.

Responses included the following passages:

"EURELECTRIC invites the Commission to explore the option to integrate 'cost-efficiency and CO2 efficiency of implemented measures' as a criterion to evaluate policies carried out by the Member States." – EURELECTRIC.

"I do not believe that there is hidden gold in this mine of indicator the hundreds of experts (and the two-hundreds of non-experts) have been digging for decades." – Energy Authority of Finland.

"Indicators on public and private investments in energy efficiency and indicators such as numbers of jobs created, health and air pollution costs avoided should be added. This would increase the visibility and understanding of the multiple benefits of energy efficiency and how having ambitious targets for energy efficiency can drive these benefits." – Umweltdachverband.



Part II – Technical questions

7. Article 6: Public procurement (continued)

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?

53% shared the view that measures on public procurement should be mandatory also for public bodies at regional and local levels, versus 26% who had no view. Merely 21% expressed the view that such measures should not apply to public bodies at regional and local levels.

Those in favour of extending procurement rules to local and regional levels argued that such obligations would tap into significant underdeveloped energy efficiency potential. Non-central government authorities would account for a larger share of energy consumption than central authorities in most member states. Some also explained that procurement rules should eventually be extended to all bodies governed by public law. Finally, some also noted that if such rules were to be extended to local and regional levels, then local and regional authorities would save money. Those who opposed the idea of extending procurement rules to local and regional levels argued that local and regional authorities would be subject to tight budgets and that such policy would lead to market distortions. Some also noted that member states would not have the authority to extend procurement rules to local levels. A third group of participants argued that there would be no need to oblige local and regional authorities, as energy efficient products and services – if prices correctly and comprehensively – would make sense in any case. Local and regional authorities would automatically choose the most cost efficient products and services.

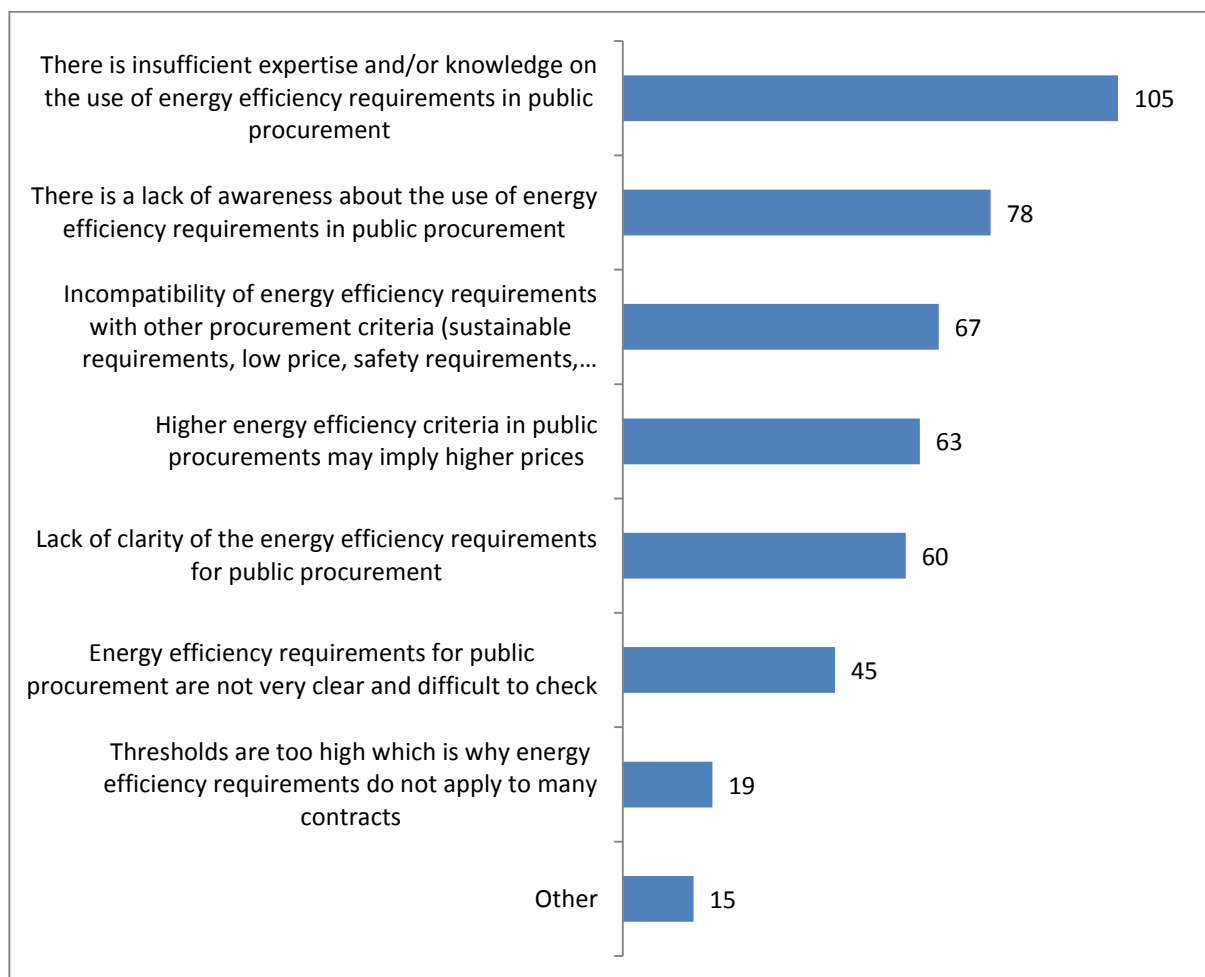
Responses included the following passages:

"The scope of public procurement rules under Article 6 should be extended to all public authorities to cover all public contracts, and clear and ambitious energy performance levels should be set (including for new and existing buildings). Guidance and financial instruments should be made available and targeted towards local and regional authorities. [...]" – ZERO - Associação Sistema Terrestre Sustentável.

"Yes. Regional and local authorities have the highest potential to work as example thanks to their visibility for citizens and companies and should therefore comply with the same requirements of national bodies' buildings. Public procurement requirements should therefore be extended to all publicly owned buildings, irrespective of their size. [...]" – VIPA International - Vacuum Insulation Panel Association.

"[...] If the proper and proven methodologies are in place and proven through successful outcome in several procurements carried out by the central government, the regional or local governments will follow the example. Of course moral and supervisory support as well as guidance may be needed." – Ministry of Economic Affairs and Communications, Republic of Estonia.

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:



The three main barriers identified by participants were 'insufficient expertise and/or knowledge on the use of energy efficiency requirements in public procurement' (105), 'lack of awareness about the use of energy efficiency requirements in public procurement' (78) and 'incompatibility of energy efficiency requirements with other procurement criteria' (67).

The most prominent 'other' barrier identified by participants was that preliminary investment as a criterion should be replaced by Total Cost of Ownership (TCO). 'Other' covered a wider range of further barriers, including the following examples:

"Lack of awareness of multiple benefits" – EuroACE (European Alliance of Companies for Energy Efficiency in Buildings).

"public accounting rules" – Danfoss.

"Not aligned with EU/national GPP criteria" – Abby Semple, EU citizen from the UK.

Participants explained that public procurement decision would too often be purely based on price, subject to an annual budget. Public authorities would thereby disregard the distinction between fixed and variable costs, and fail to consider lifecycle costs. For this reason several participants suggested that public authorities should move beyond merely calculating expenses during the current year, and instead look at the lifecycle cost of a product or service. Some also noted, however, that authorities would lack the necessary understanding to conduct lifecycle cost analyses. Furthermore, some participants also explained that the accounting rules would have to be reformed, so that investments into energy efficiency have a positive impact on public deficits. Currently, such investments would only be accounted for as further debt. Finally, several participants also called for an independent monitoring system.

Responses included the following passages:

"Eurostat rules on public debt and deficit, when the competent national authorities contend that investments incurred by the ESCOs for public infrastructure under EE services contracts should be counted towards the calculation of public deficit while investment in EE generates monetary savings that have the proven potential to refund all or part of the cost of the investment [...]" – ENGIE SA.

"Procurement price is still the sole parameter in numerous public procurement decisions – even though a higher initial procurement price is recovered many times through a lower life-cycle-cost." – Grundfos Holding A/S.

"Split tendering prescribed by the current Public Procurement Directive, lack of energy managers with adequate training in public buildings, lack of skills in general." – EDF Energy Plc.

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?

52% shared the view that all EU public procurement rules relating to sustainability should be gathered into a single EU guidance framework, versus 33% who had no view on this and 15% who opposed this idea.

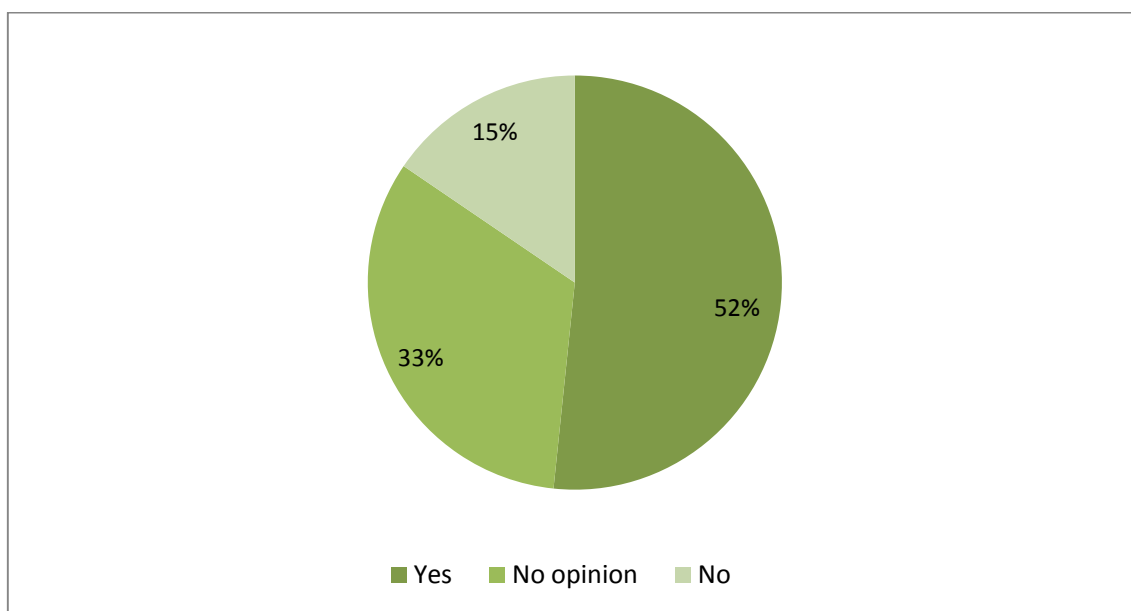
Participants explained that a single EU guidance framework would facilitate policy coordination across Member States, lead to more legislative coherence and transparency, provide an overview of how energy efficiency and renewable energy sources complement each other and interact, lay the foundation for more harmonization and simplification, and trigger positive synergy effects.

Responses included the following passages:

"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." – European Association of electrical contractors.

"All EU public procurement rules should be gathered into a single framework in order to have the possibility for interchangeability of EE and RES. The main objective is one and the same - protection of climate." – Black Sea Research Energy Centre.

"The Commission should ensure coordination and coherence between different pieces of legislation, which could work as different "modules" of the same topic, i.e. public procurement rules. We also need full implementation of LCA and LCC methodologies in public and private procurement. The impacts shown in LCAs (carbon footprint etc.) should be connected to the price structure through e.g. carbon costing." – Architects' Council of Europe (ACE).



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

47% did not think that there is sufficient guidance/framework to know what is meant by "energy efficient products, services and buildings", versus 30% who had no view on this and 23% who thought that there is sufficient guidance.

Some noted that while there may be sufficient guidance, this itself would not alone lead to behavioural change, especially if it would require disruption of daily routines. Other participants explained that while there would be a lot of information on energy labelling requirements, such information would not exist for energy related products. Furthermore, several argued that the quality of Energy Performance Certificates (EPCs) for buildings would have to improve, and nZEB definitions would have to be clarified. Yet other warned that there would be an information overload, making it difficult to assess good and relevant data. Some also stated that the requirements under Annex III would be unclear and too vague.

Responses included the following passages:

"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." – Nelfo - Industry Organization for Electrical Contractors in Norway.

"Like in marketing, the information flow needs to go 'push' and 'pull'. The average citizen of Europe does know little about this framework. Citizens need to get informed, mobilized, made responsible, become rewarded as well. In the end, there are people working in organizations. Organizations are nothing less than organized people. If it is the strong conviction of lots of people that these plans need to be achieved, it will help a lot." – Certios B.V.

"Yes, For new products, it could still be interesting. It is important to pursue a proper market prospection, but thorough investigation takes time." – Belgian Federal and Regional Ministries.

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?

Most participants agreed that this is a problem. Several attributed it to a general desire for very short payback periods. Other noted that it would be exacerbated by public deficits. Too often public authorities would base public procurement decisions solely on annual prices, and disregard a product's lifecycle cost. As a result, energy efficiency investments would be accounted for as debt. Furthermore, any "payback" would depend on energy prices, which would vary over time and thereby complicate savings calculations. In terms of what the solution to this problem may be, a number of participants explained that all externalities of energy must be included in the price of energy. Furthermore, the public sector would have to lead by example, and there would need to be a holistic energy approach in the building sector. Some called for more innovative finance, and the Total Cost of Ownership (TCO) as a criterion for purchasing decisions. Many also stated that there is a need to consider the lifecycle cost of a product or service, not only its upfront investment costs.

Responses included the following passages:

"Public payback period is the same year. Thus less than 1 year. In other case it is part of increasing national dept." – Ministry of Economy of the Slovak Republic.

"It is not a problem per se, with the public sector playing a leading role and applying a holistic approach at building level (construction sector, construction materials, technologies, labour, training, certification, etc.) the right sequencing in applying energy efficiency measures will reduce the total costs including use phase, it will be cheaper to run highly efficient buildings and there will be less maintenance costs. [...]" – European Insulation Manufacturers Association (Eurima).

"This is a problem. Since public authorities often work on the basis of annual budgets, public authorities tend to look at expenses during the current year, instead of life cycle costs spread over many years. Consideration may be given to whether annual energy savings could be accounted for as income in public budgets during the lifetime of the investment. [...]" – ZERO - Associação Sistema Terrestre Sustentável.

8. Article 7: Energy efficiency obligation schemes (continued)

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?

71% shared the view that most of the measures introduced under Article 7 have long lifetimes (20-30 years) and will continue to have an impact beyond 2020. 18% had no view, and 11% opposed this view.

Many participants voiced a differentiated position, however, by calling attention to the sizable number of measures that have lifetimes under 15 years. Some also noted that only very specific measures, such as district heating or large CHP systems, would have long lifetimes. In general, most participants agreed that EEOs promise to generate savings beyond 2020. Several participants argued that the sunset clause of Article 7 should be lifted, as any 2030 target may otherwise not be met, and warned of not to fall into the trap of a "stop and go" approach: the Commission and Member States should try to prevent initiating certain policies which are later put on hold before they are fully implemented, as this could significantly impair successful policy outcomes. Those who did not believe that measures under Article 7 have long lifetimes primarily argued that there would not be sufficient data to make such a claim.

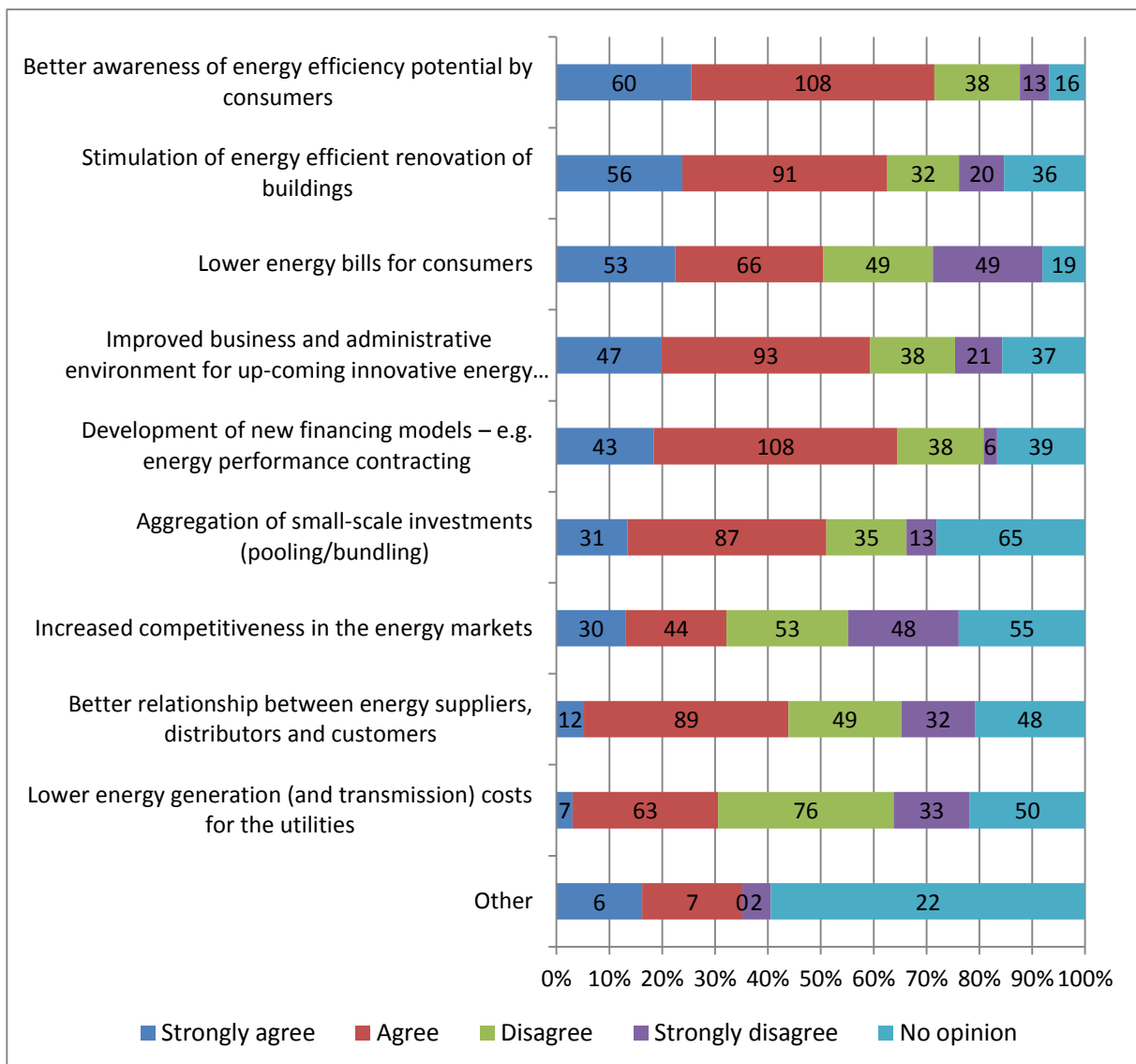
Responses included the following passages:

"There is insufficient evidence of lifetimes of measures, and where it is reported by Member States there are concerns that they are overestimated. The ending of Article 7 in 2020 is an obstacle to measures with long lifetimes and can lead to "stop and go" policies. [...] – Climate Alliance.

"Some measures will continue to have impact beyond 2020 but it may be not enough to reach 2030 targets. The year 2020 is a deadline to implement EE measures. The effect shall be permanent (continuing after 2020). EC should fix additional targets after 2020 with more stringent EE requirements to reach 2030 targets." – Coordinating Committee for the Associations of Manufacturers of Switchgear and Controlgear (CAPIEL).

"In household sector there are long-term investments. In the industry and services sector the investments have rather medium term durability." – Ministry of Industry and Trade of Czech Republic.

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



Over 70% of all participants either agreed (108) or strongly agreed (60) that EEOs lead to 'better awareness of energy efficiency potential by consumers'. Over 60% agreed (91) or strongly agreed (56) that EEOs trigger 'stimulation of energy efficiency renovation of buildings'. Over 60% also agreed (108) or strongly agreed (43) that they lead to a 'development of new financial models', such as energy performance contracting. Nearly 50% also, however, disagreed (76) or strongly disagreed (33) that EEOs would lead to 'lower energy generation (and transmission) costs for the utilities'.

'Other' was specified in a number of ways, including the following examples:

"Development of new business models – suppliers [...]" – European Insulation Manufacturers Association (Eurima).

"Cost-efficient GHG reductions in the energy sector" – Ministry of Economic Affairs and Communications, Republic of Estonia.

"Improved health due to the increased comfort benefit – however also accompanied by some wastage." – Bord na Móna plc, Main Street, Newbridge, Co Kildare.

Several participants explained that given that SMEs tend to have rather short planning horizons, EEOSs are a useful tool to incentivise energy efficiency measures. That being said, a sizable number of participants also argued that this survey question is biased, as it only refers to the benefits of EEOSs and thereby ignores similar benefits of 'alternative measures'. 'Alternative measures', too, would have multiple benefits.

Responses included the following passages:

"Hardly any investment is made only due to the EED, especially energy intensive processes have always called for awareness of energy efficiency and according measures on their own. In addition, the relationship with costumers, distributors and suppliers become more complex and controversial due to additional diverging interests and costs." – Federation of Austrian Industries.

"EEOs are a proven tool for stimulating energy efficiency and help energy companies change their business model from only focusing on selling energy to providing energy services. In 2013, IEA, in its report "Energy Provider - Delivered Energy Efficiency: A global stock taking based on case studies" estimated that the annual spending on EEOs in the EU was 2.5 billion dollars. [...]" – Energy Saving Pioneers.

"Most benefits listed above are a result of stimulating EE in general, including by alternative measures. The question is biased towards EEOS. EEOS have to be well-designed to avoid distorting competition. [...]" – ENGIE SA.

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?

46% stated that they had 'no opinion' on whether they were aware of any developments in the energy services markets that have benefited particular actors in Member States having an obligation to define the obligated parties under the energy efficiency obligation scheme, versus 28% who had and 26% who had not.

As example of particular actors who have benefited from EEOs, participants listed the energy service sector, utilities by gaining access to data on customers' consumption behaviour, energy efficiency installer companies, and energy performance contracting firms.

Responses included the following passages:

"Utility companies have the benefit of the energy data consumption and therefore first hand information regarding the customer's energy consumption. The principles of market economy oblige us however to believe that the few and large utility companies are not necessarily structured and in the best position in terms of credibility towards the customer. [...]" – BUNDESINNUNG DER ELEKTRO-, GEBÄUDE-, ALARM- UND KOMMUNIKATIONSTECHNIKER.

"In Spain, there are legislative developments, through the IDAE funding programmes (see point 3.1) that are benefiting energy services providers. These are mostly the programmes that refer to the replacement of the public municipal lighting, the fostering of energy efficiency in SMEs and grand industries and the energy renovations of residential buildings and hotels. [...]" – Inter-Environnement Wallonie.

"In the UK many energy efficiency installer companies had benefitted significantly from the imposition of energy efficiency obligations schemes on suppliers, as it provided a significantly subsidised market, and the demand for installed measures overwhelmed supply. [...]" – RWE AG.

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.

Participants listed a number of requirements of Annex V that need more precise guidance. Several called for additional guidance on how to count savings beyond minimum requirements, and how to adhere to the additionality, conditionality and materiality criteria. Some also asked for more specific information on which savings may not be counted towards Article 7's savings target, generated for example under EcoDesign, the EPBD, and CO2 standards for vehicles.

A number of participants also noted that the Annex V would have to be simplified, as it would currently be overly complicated and bureaucratic. Furthermore, several explained that savings would currently be limited to the timeframe between the moment of implementation and the end of the legislative timeframe, that is, 2020. As a result the calculation methodology would disincentivise energy efficiency measures with long lifetimes towards the end of the legislative period. Some participants also called for more guidance on how to conduct lifetime savings analyses, and for clearer definition.

Responses included the following passages:

"We ask the European Commission to clarify in this annex how embedded CHP plants should be dealt." – Italcogen-ANIMA - Italian Association of CHP System Manufacturers & Distributors in ANIMA federation.

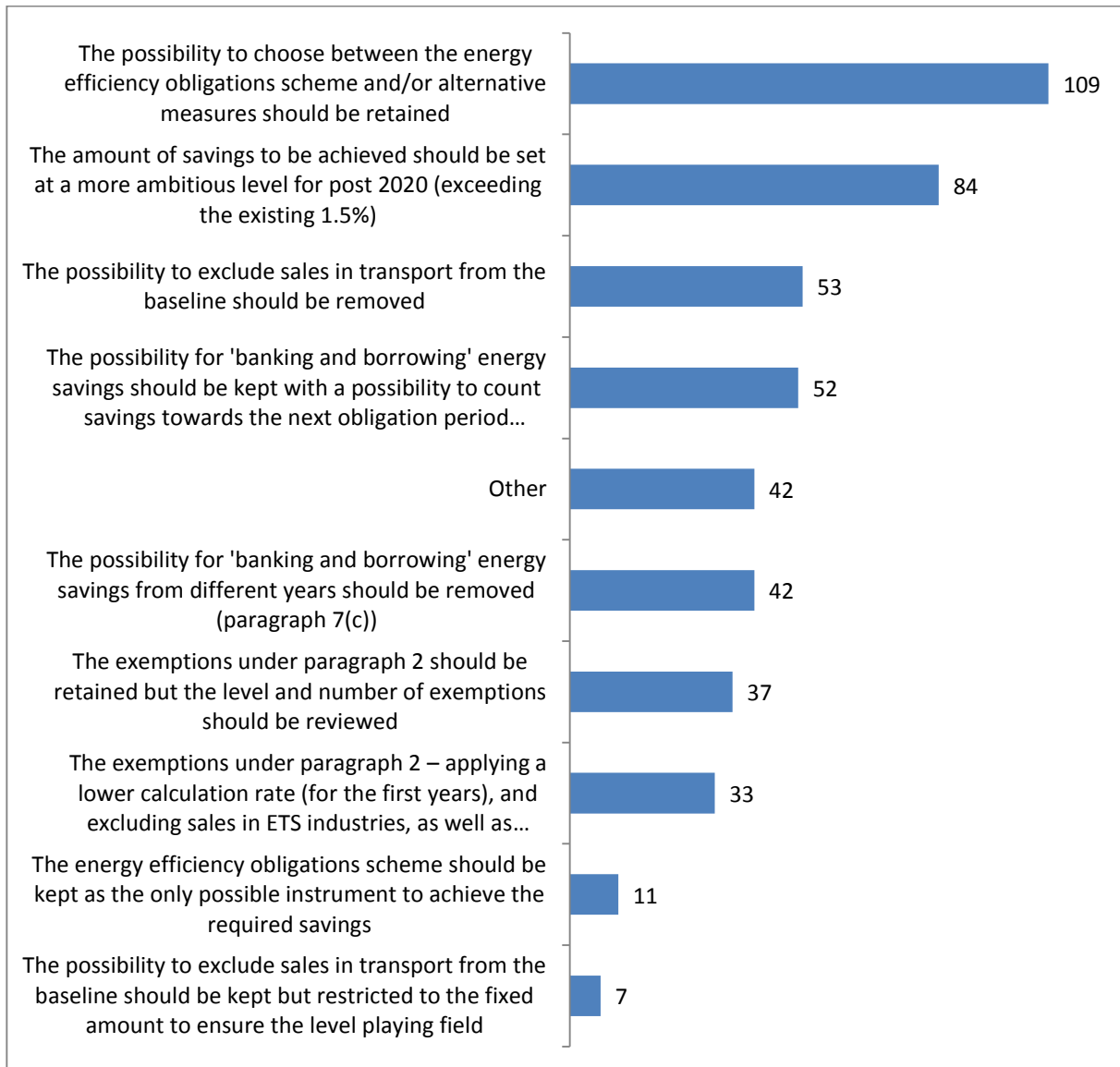
"Annex V is already really bad - complicated and bureaucratic. We do not need any additional guidance." – Energy Authority of Finland.

"The calculation of energy savings takes into account the lifetime of savings. However, the savings are currently limited to the one achieved between its implementation and the end of the period i.e. 2020. Such calculation methodology is not fair and strongly decreases the amount of savings for actions implemented close to the end of the period. It prevents the full potential realisation of energy savings. Therefore the lifetime of the savings should be based on technical realistic lifetime of the project and not limited to the end of the period." – TOTAL SA.

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?

63% shared the view that the Article 7 obligations should continue beyond 2020 in view of the new energy efficiency target for 2030, versus 28% who opposed this view, and 9% who had no view on this.

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):



The top three factors mentioned by participants which should be considered for the future Article 7 were the following: 'the possibility to choose between the energy efficiency obligations scheme and/or alternative measures should be retained' (109), 'the amount of savings to be achieved should be set at a more ambitious level for post 2020 (exceeding the existing 1.5%)' (84), and 'the possibility to exclude sales in transport from the baseline should be removed' (53).

The option 'Other' was specified in a number of ways, including the following examples:

"The exclusion of ETS industry sales is a left-over from the ESD, and is likely no longer justified."
– *European Council for an Energy Efficient Economy (eceee).*

"Energy savings could be accompanied by alternative demand side flexibility (DSF) measures." –
The European Partnership for Energy and the Environment (EPEE).

"Exemptions, or rather 'statistical tricks', that reduce the minimum energy savings to be delivered"
– *Energy Cities.*

Participants who disagreed that Article 7's sunset clause should be lifted argued that the 2030 energy efficiency target is not binding; the primary goal is not energy efficiency but better air quality and climate protection; a significant number of energy efficiency policies will come into effect this years which is why no further action would be needed; and as Article 7 would seek to reduce absolute energy reductions, it would fail to foster energy efficiency across all sectors equally.

Participants who shared the view that the commitment period should be extended beyond 2020 argued that, Article 7 would be the most effective currently available policy tool to reduce primary energy consumption; it would be imperative to deliver 1.5% savings every year; an extension of Article 7's obligations would incentivise long-term measures and commitments; an extension would also promote the energy efficiency service market and assure that previous efforts would not be undermined. Some respondents favouring the exertion of Article 7 also stated that exceptions must be reduced, more efforts should focus on transportation, and savings in the non-ETS sector should be allowed to be counted towards the 1.5% energy target.

Responses included the following passages:

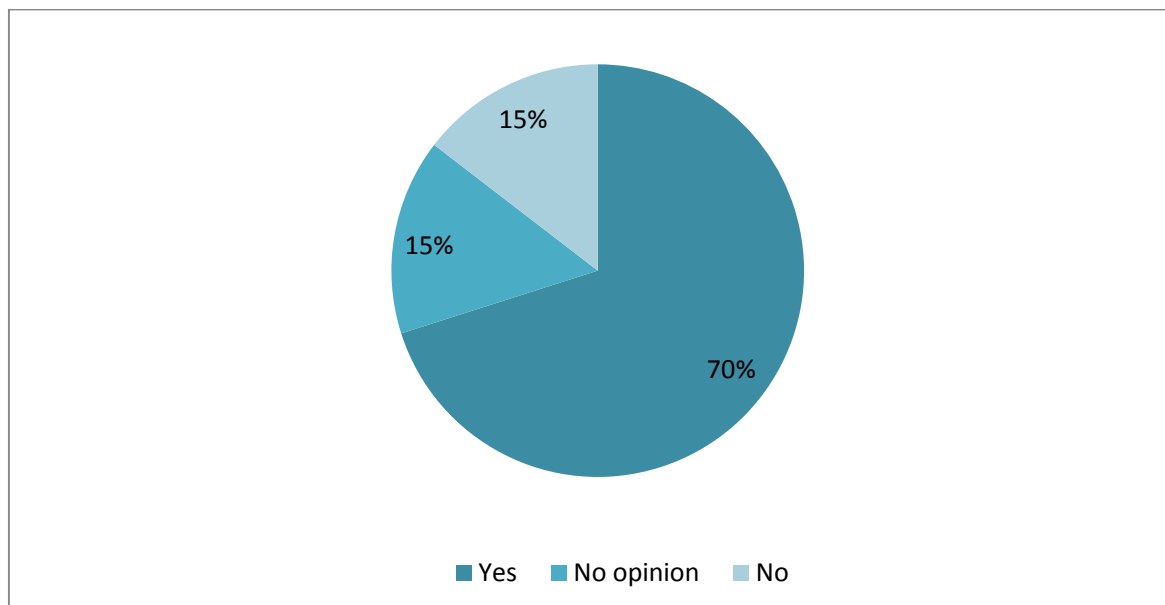
"Also in the transport sector a lot of energy efficiency gains are possible, there for the exception of this sector should be dropped." – *GreeningEurope.eu.*

"The exemptions introduced during the legislative process should be removed. It is estimated that with the current provisions the average final energy savings delivered are only 0.8% instead of 1.5%. It must be ensured that at least 1.5% additional energy savings are delivered every year. [...]" – *Umweltdachverband.*

"Art7 cannot be continued as is. As stated before, art7 is based on an absolute reduction target of E consumption and is therefore not leading to EE improvements across all sectors. [...]" – *essenscia.*

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

70% shared the view that the scope of eligible measures allowed under Article 7 should be clarified, versus 15% who had no view and 15% who did not think that they should be clarified.



If yes, please explain your answer further:

Of those 70% who did think that the scope should be clarified, 67% shared the view that the scope should be expanded. 25% stated that the scope only be end-use energy savings, as is currently the case. 8% provided views under the 'Other' option.

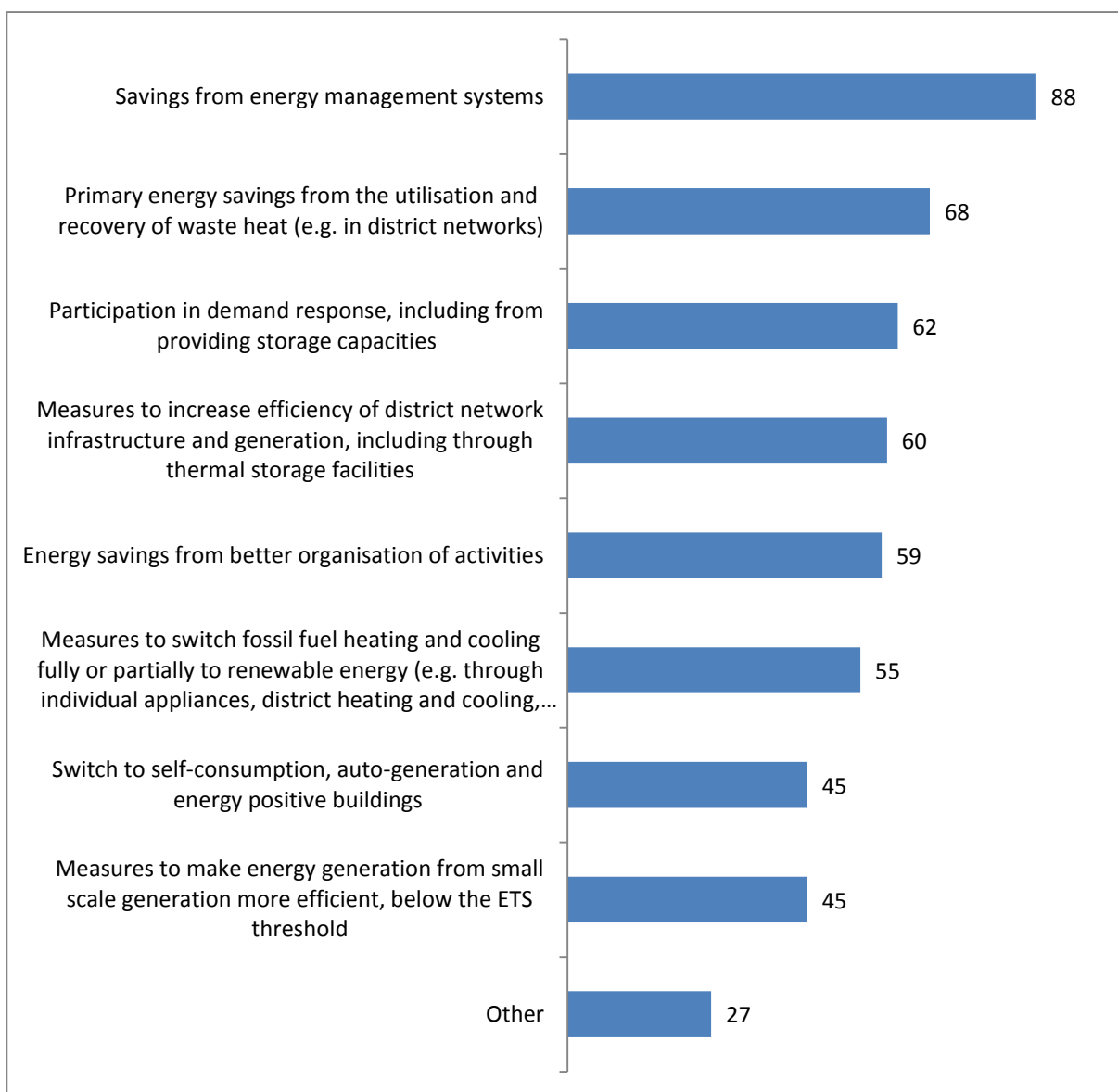
Views under the option 'Other' varied in a number of ways, including the following examples:

"Activities covered by ETS should be excluded from any additional target, as the ETS is already leading to energy efficiency improvements." – Association of the Austrian Cement Industry.

"vital to keep scope in energy efficiency and avoid overlaps with other directives (RES, EPBD, ETS)" – Finnish Energy.

"The scope of eligible measures should be expanded" – FIRE - Italian federation for energy efficiency.

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



The three most popular possibilities selected were 'savings from energy management systems' (88), 'primary energy savings from the utilisation and recovery of waste heat (e.g. in district networks)' (68), and 'participation in demand response, including from providing storage capacities' (62).

Views under the option 'Other' varied in a number of ways, including the following examples:

"Energy storage in the building fabric should be accounted for. It reduces the CO2 by shifting demand" – BIBM - European Federation of Precast Concrete.

"Support the deployment of EE H&C (e.g. heat pumps, micro-CHP, condensing heaters, solar thermal)" – European Heating Industry Association – EHI.

"all possibilities, not regulated by legislation, even not ban to report realised savings" – Ministry of Economy of the Slovak Republic.

With reference to responses presented in the above graph, several participants explained that the scope should also be extended to include the extensive usage of products that are covered by the EcoDesign

initiative. Some called for more clarification, especially regarding additionality, materiality, and eligibility. Regarding the latter, some also requested that the overlap with renewables should be clarified.

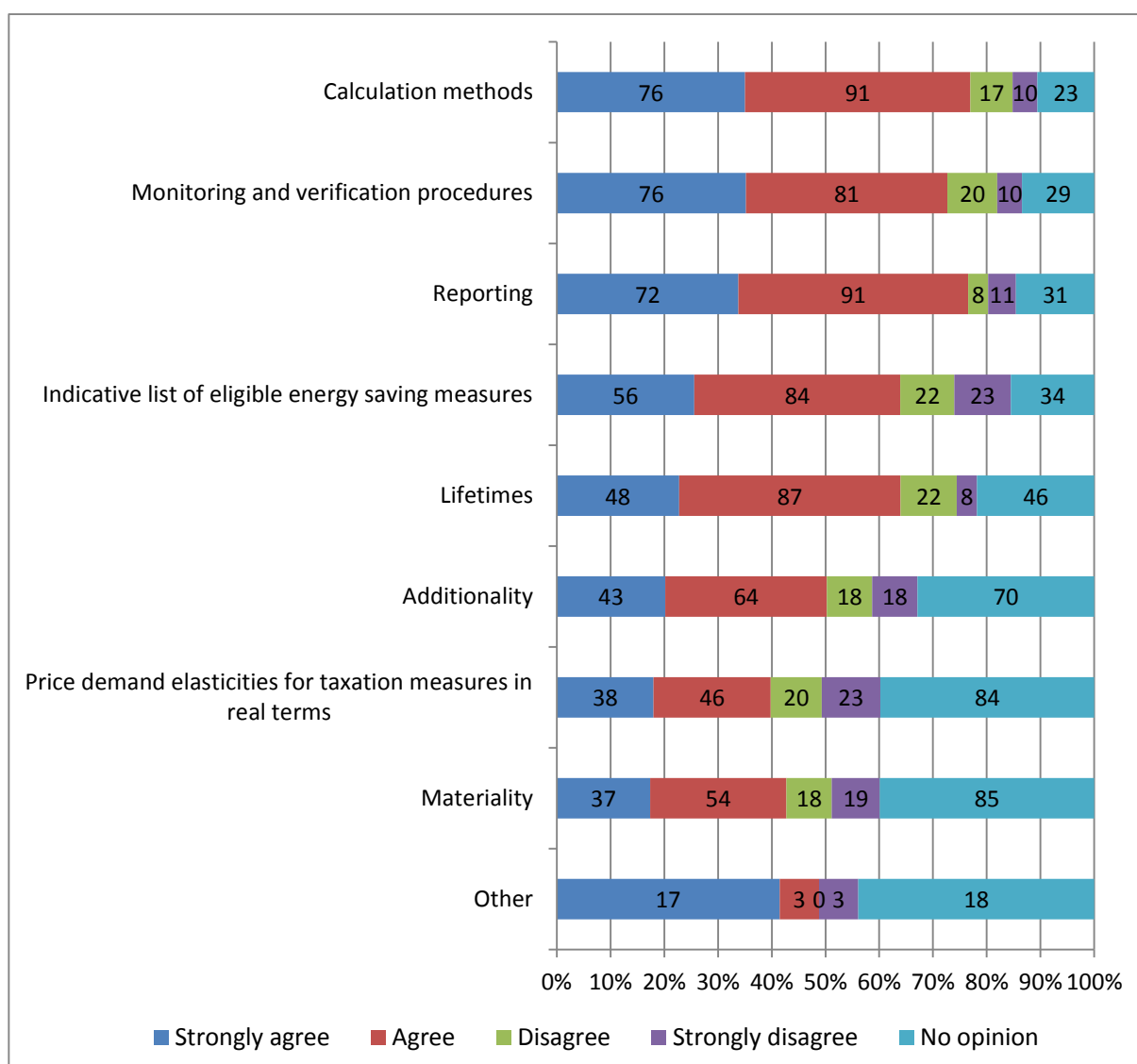
Some participants stated that the current focus on end-use savings should continue, but that measures should simultaneously facilitate savings across the entire energy supply chain. Yet others argued that the scope should be extended to include the most efficiency heating and cooling technology, and that a premium should be given for technologies and services that deliver an energy efficiency multiplier effect. Several participants also requested the Commission to review the 1.5% target, as it would not be sufficiently ambitious in light of the newly ratified climate goals.

Responses included the following passages:

"The scope of eligible measures should be only end-use energy savings (as it is at the moment). However, measures should support the implementation of energy efficiency measures elsewhere in the supply chain (via Article 14 and 15), which help to reach the indicative national energy efficiency targets set under Article 3." – Climate Alliance.

"Give a premium to technologies/services with multiplier effect (for example, energy efficiency + renewable energy integration) so to encourage best practices deployment, such as: • Switch to self-consumption, auto-generation and energy positive buildings • Participation in demand response, including from providing storage capacities • Savings from energy management systems • Energy savings from better organization of activities" – ORGALIME – The European Engineering Industries Association.

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?



Over 70% of respondents shared the view that it would be beneficial if 'calculation methods', 'monitoring and verification procedures' and 'reporting' under Article 7 would be harmonised across Member States.

Over 60% also shared the view that that it would be beneficial if an 'indicative list of eligible energy savings measures' and 'lifetimes' would be harmonised. Only very few either disagreed or strongly disagreed that the above listed requirements should be further harmonised.

The option 'Other' was specified in a number of ways, including the following examples:

"White certificate scheme should be more clearly defined" – Ivan Šerić, EU citizen from Croatia.

"penalties" – Bund für Umwelt und Naturschutz Deutschland e.V. Friends of the Earth Germany.

"Include CHP in the Indicative list of eligible energy saving measures" – Italcogen-ANIMA - Italian Association of CHP System Manufacturers & Distributors in ANIMA federation.

Some participants warned that harmonisation efforts could lead to unnecessary bureaucracy. There would not be a one-size-fits-all solution. One of the key strengths of Article 7 would be its flexibility that allows Member States to tailor customised solutions to local problems. This flexibility should not be undermined.

Other participants noted that greater harmonisation would also, however, increase transparency and comparability, and thereby create a more level playing field across Member States. Some also argued that an auctioning system could be introduced, so as to assure cost-effectiveness.

Responses included the following passages:

"There is no need for more administration. I am not aware of any other area with such big inefficiency as the political scene related to the area of energy efficiency." – Pinchco bvba.

"It will increase transparency and comparability, while helping create a level playing field among Member States." – Climate Action Network Europe (CAN Europe).

"An indicative list of eligible energy savings measures should not lead to administrative burden where these measures are used as a tick list for the competent authorities but rather for sharing knowledge between companies on how to possibly save energy." – ESD – SIC.

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

Participants explained that the EU should monitor the implementation of Article 7 and its progress; ensure compliance across the EU, if necessary with infringement procedures; provide guidance, for example regarding savings calculation methodologies, Annex V, and Behavioural Energy Efficiency (BEE) programmes; facilitate overall transparency and comparability; set clear energy efficiency goals; provide funding for energy efficiency initiatives; and support the development of financial products that further energy efficiency.

Responses included the following passages:

"[...] Financial monitoring provisions should require the obligated parties to report on the costs they pass on to consumers under these schemes and which require national regulators to regularly review the impact that these schemes have on consumers' energy bills. For instance, while the cost transparency has improved greatly in the UK, there is still a lack of transparency on how these costs are passed to consumers." – BEUC, The European Consumer Organisation.

"When reviewing the EED and especially provisions of the Article 7, the EU should support further development of financial instruments and project development assistance to leverage private sector investment in energy efficiency measures, high-energy efficiency equipment and technology." – Ministry of Economics of the Republic of Latvia.

"The EU should coordinate the implementation of the Article 7 and assist the Member States in order to precise the definitions. The EU should also assist the Member States in the process of setting the monitoring systems." – Ministry of Industry and Trade of the Czech Republic.

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

Several participants put forward the following best practice example: the way heat is analysed and utilized as part of industrial processes in Switzerland; energy efficiency tendering systems, as rolled out in Portugal, Switzerland, Vermont (USA), Germany and the UK; certified energy management systems, such as the one in Denmark; funding schemes, such as KfW loans and grants, to facilitate measures beyond minimum building standards; ubiquitous charging stations for electric vehicle; guarantees to private households for energy efficiency gains, as in Austria; lessons learnt from behavioural economics; and the Scottish Government's Home Energy Efficiency Programmes (HEEPs)

Responses included the following passages:

"Certain member states like France, Italy and Slovenia have designed their implementing measures for article 7 fully covering the CHP case (industrial CHP and micro-chp). Methodologies and standards do exist in those countries to account for the efficiency of the CHP plant and compare it with the alternative situation where power and heat are supplied by two separated generating assets." – Italcogen-ANIMA - Italian Association of CHP System Manufacturers & Distributors in ANIMA federation.

"A very successful tool in Germany is the funding program of the KfW, other Member States could develop similar support systems. Energy efficiency networks can also be seen as a very successful measure, in particular in the industrial sector. This, too, is suitable for best practice communications." – BDEW Bundesverband der Energie- und Wasserwirtschaft e.V.

"The Italian White Certificates mechanism has reached significant results in terms of reduction of energy consumption." – ASSOESCO – Italian Association of the Energy Service Companies.

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?

Participants' views were mixed. Those who were in favour argued that tradability would align energy efficiency measure with the European Single Market, and facilitate cost-efficiency across the EU if implemented along market-based principles. Amongst those who opposed the idea noted, for example, that while such a scheme could work for industrial actors with operations in several Member States, it would be too costly to implement at a governmental level. Others also argued that a trading scheme would require harmonised definitions and savings calculation, neither of which could currently be secured. Some participants also made the case that Member States should only be allowed to trade savings once its cost-effective energy efficiency savings have been realized.

As of today, no Member State would be at this stage. Yet other respondents argued that a trading scheme could result in manipulation, and be unfair to consumers. Energy efficiency measures should cater to local economies, and stimulate local economic growth.

Responses included the following passages:

"No. We are concerned about allowing the trading of savings across national borders, as it is unfair to consumers to levy charges on energy bills in one country in order to benefit consumers in another Member State. This could also lead to gaming by the energy companies and challenge the verification of energy savings achieved." – BEUC, The European Consumer Organisation.

"As long as there is no comparable energy saving unit that can be traded, member states could only transfer their savings bilaterally. To be able to do so member states would have to agree on methodologies and procedures to determine the savings mutually, which seems unlikely in the near future." – Österreichs E-Wirtschaft.

"Yes, any such cost-effective solutions should be supported, as long as they would operate on a market-base approach and in line with all the internal market rules. However, it would have been challenging to create system where double calculation is avoided, especially of several sectors, large number of consumers and energy traders involved." – Hungarian Petroleum Association.

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?

Some participants voiced interest in such a system, referring for example to a green certificate scheme. Some of these participants also stated that there should not be an obligation to increase the share of renewables, and that an overlap with biofuels should be avoided.

Nevertheless, the majority did not believe that such a system would be beneficial. The key objective of EEOs would be to foster efficiency through innovation and competition. While energy efficiency and renewables should be complementary and mutually reinforcing, both issues should be kept separate, to avoid complexity and unwanted overlaps. The systems would currently be sufficiently complicated as they stand.

Furthermore, it would be important to highlight energy efficiency as a target in its own right. Whether such a system should be pursued would have to be decided on a Member State level, and would not fall under the mandate of the European Commission. Mixing different legal systems should be avoided.

Responses included the following passages:

"[...] The increase of energy efficiency is a stand-alone target and mixing different legal systems should be avoided. Measures increasing the share of renewables should be seen only as complementary, not substituting efficiency measures." – BEUC, The European Consumer Organisation.

"No. EEOs schemes on suppliers and distributors must be focused on improving energy efficiency and creating energy savings. Measures to increase the share of renewable energy are complementary and additional and should be addressed accordingly but elsewhere. EEOs should remain an end-use instrument with the clear objective to target energy end-use demand, only thereafter, can energy supply requirements be meaningfully calculated. [...]" – ROCKWOOL International A/S.

"It could be appropriate, but only if MS systems can be combined, which is not the case now. In any case, the systems should first be made more robust. [...]" – ENGIE SA.

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

54% either strongly disagreed (36%) or disagreed (18%) that the option of establishing an EU wide 'white certificate' trading scheme should be considered for post 2020. 25% had no view. Merely 21% either agreed (15%) or strongly agreed (6%) that a 'white certificate' trading scheme should be considered.

Some participants noted that a 'white certificate' trading scheme could not be implemented as energy efficiency targets would be indicative. Furthermore, some explained that trading schemes would currently not be sufficiently developed to be scaled to a European level. To date, such schemes would only work in a few selected countries, such as the United Kingdom, France, Italy and Denmark.

Some participants noted that a trading scheme should only be considered once each Member State has fully exploited its domestic energy efficiency potential. As no country would have reached this stage yet, Member States should continue to focus on domestic savings. While energy efficiency and renewables should underpin the EU ETS, it would remain unclear how an energy efficiency trading scheme would be compatible with the EU ETS.

Some participants pointed out that a 'white certificate' trading scheme would require compatible EEOs across Member States, and robust monitoring and verification schemes. Simultaneously, however, a European trading scheme would also lead to more complexity in monitoring and verifying energy savings. Participants warned that a 'white certificate' trading scheme would add further complexity to a complex web of pre-existing legislation.

Responses included the following passages:

"According to the available information on implementation of "white certificate" schemes there is evidence that only in very few EU MS this scheme worked properly (United Kingdom, France, Italy, Denmark; Poland experience great difficulties with implementation). Therefore, it is doubtful that establishing an EU wide 'white certificate' trading scheme will give significant energy saving results. [...]" – Ministry of Economics of the Republic of Latvia.

"Full implementation of the directive in its current form and evidence suggesting that cost effective savings potential have been reached at the national level would have to happen before an EU wide "white certificate" trading scheme should be discussed when a country has demonstrated that the cost-effective savings potential is fully tapped. It is clear that no country is currently at that stage [...]" – AIMCC : Association française des industries des produits de construction.

"It is unclear how such a scheme would be reconciled with EU ETS and other market-based measures. This question also shows the overlap and duplication which result from applying Article 7 EED to activities already covered by EU ETS." – International Air Transport Association.

Annex I: List of online survey participants

This list captures all participants who submitted contributions to the online survey as of 9 February 2016, and who consented to their submission being published under their provided name. The list therefore excludes all participants who submitted contributions anonymously, and who explicitly stated that their contribution should not be published at all and only be subject to internal analysis within the European Commission. The list also excludes participants who only submitted non-online survey based responses. All names are presented as submitted by the participants themselves.

All online-based submissions by the below listed participants may be retrieved as an Excel file from the consultation website. All non-confidential, non-online survey based contributions may also be downloaded from the consultation website.

Please enter the full name of your organisation or institution:	Please specify which category best describes your organisation or institution from the list below:	Please indicate your principal country or countries of residence or activity:
Abby Semple, EU citizen from the United Kingdom		United Kingdom
AFEP (French Association of Large Companies)	Industry/business association	France
AFME (Spanish Association of Electrical Equipment Manufacturers)	Industry/business association	Spain
Agencia Andaluza de la Energía (Andalusian Energy Agency)	Other: Public company. Andalusian regional government	Spain
AGFW, Der Energieeffizienzverband für Wärme, Kälte und KWK	Industry/business association	Germany
AIGET - The Italian Association of Energy Traders & Suppliers	Industry/business association	Italy
AIMCC : Association française des industries des produits de construction	Industry/business association	France
Air France _ Airlines	Private company	France
ALLIANCE SOLUTIONS FIOUL	Industry/business association	France
American Chamber of Commerce to the European Union (AmCham EU)	Industry/business association	Belgium
Amici della Terra Italia	Non-governmental organisation (NGO)	Italy
ANEC	Other: Consumer organisation	Other: ANEC represents consumers in 33 European countries.
ANIE Federazione – n° 74070773644-23 Transparency Register	Industry/business association	Italy

AOP (Asociación Española de Operadores de Productos Petrolíferos)	Industry/business association	Spain
APE Agencija za prestrukturiranje energetike d.o.o.	Consultancy	Slovenia
Architects' Council of Europe (ACE)	Other interest group organisation/association	Belgium
AS "RĪGAS SILTUMS"	Utility	Latvia
ASCER (Spanish Ceramic Tile Manufacturers' Association)	Industry/business association	Spain
ASOCIACION DE EMPRESAS DE MANTENIMIENTO Y SERVICIOS ENERGETICOS-AMI	Other interest group organisation/association	Spain
Association for the Conservation of Energy	Industry/business association	United Kingdom
Association for the District Heating of the Czech Republic	Industry/business association	Czech Republic
Association of European Airlines	Industry/business association	Belgium
Association of European Airlines	Industry/business association	Belgium
Association of German Chambers of Commerce and Industry (DIHK e. V.)	Industry/business association	Germany
Association of the Austrian Cement Industry	Industry/business association	Austria
ASSOESCO – Italian Association of the Energy Service Companies	Other interest group organisation/association	Italy
Austrian Association for Building Materials and Ceramic Industries	Industry/business association	Austria
Austrian Federal Chamber of Labour	Non-governmental organisation (NGO)	Austria
Austrian Federal Economic Chamber (AFCO)	Industry/business association	Austria
Autodesk Inc.	Industry/business association	Other: Autodesk Inc. operates globally
BDEW Bundesverband der Energie- und Wasserwirtschaft e.V.	Industry/business association	Germany
Belgian Federal and Regional Ministries	Central public authority	Belgium
BEUC, The European Consumer Organisation	Non-governmental organisation (NGO)	Belgium

BFW Bundesverband Freier Immobilien- und Wohnungsunternehmen e.V.	Other interest group organisation/association	Germany
BIBM - European Federation of Precast Concrete	Industry/business association	Belgium
Black Sea Research Energy Centre	Consultancy	Bulgaria
bne (Bundesverband Neue Energiewirtschaft e.V.): German Association of Energy Market Innovators	Industry/business association	Germany
Bord na Móna plc, Main Street, Newbridge, Co Kildare	Utility	Ireland
BOUYGUES EUROPE	Private company	France
British Pump Manufacturers Association Ltd	Industry/business association	United Kingdom
Bund für Umwelt und Naturschutz Deutschland e.V. Friends of the Earth Germany	Non-governmental organisation (NGO)	Germany
BUNDESINNUNG DER ELEKTRO-, GEBÄUDE-, ALARM- UND KOMMUNIKATIONSTRECHNIKER	Industry/business association	Austria
Bundesverband der Deutschen Industrie (BDI)	Industry/business association	Germany
Bundesverband Großhandel, Außenhandel, Dienstleistungen e.V.	Industry/business association	Germany
CECAPI (European Committee of Electrical Installation Equipment Manufacturers)	Non-governmental organisation (NGO)	Other: CECAPI is an European Association
CEDEC - the European Federation of Local Energy Companies	Industry/business association	Belgium
Cefic - European Chemical Industry Council	Industry/business association	Belgium
CEMBUREAU - The European Cement Association	Industry/business association	Belgium
Center for Monitoring Business Activities in the Energy Sector and Investments	Central public authority	Croatia
Centrica plc	Utility	United Kingdom
CEPI - Confederation of European Paper Industries	Industry/business association	Belgium
Cerame – Unie, the European Ceramic Industry Association	Industry/business association	Other: EU

Cercle de l'Industrie	Industry/business association	France
Certios B.V.	Consultancy	Netherlands
ČEZ, a. s., EC register ID: 429600710582-32	Utility	Czech Republic
Chartered Institution of Building Services Engineers	Other: Institution of Professional Engineers working in energy design, use and management of buildings	United Kingdom
Chemical Industries Association	Industry/business association	United Kingdom
CIR asbl - vzw Conseil d'Isolation - Isolatie Raad umbrella Belgian insulation sector	Industry/business association	Belgium
Citizens Advice	Non-governmental organisation (NGO)	United Kingdom
Climate Action Network Europe (CAN Europe)	Non-governmental organisation (NGO)	Other: European level
Climate Alliance	Other interest group organisation/association	Germany
Coalition for Energy Savings	Other: Association representing businesses, professionals, local authorities, trade unions, consumer & civi	Belgium
Coalition France pour l'efficacité énergétique	Non-governmental organisation (NGO)	France
COGEN Europe	Other: Association representing businesses, professionals, research institutes interested in promoting chp	Belgium
COMUTO SA (BlaBlaCar)	Private company	France
Confederation of European Waste to Energy Plants	Industry/business association	Other: European Association
Confederation of Finnish Industries EK, Register ID: 1274604847-34, PO Box 30, FIN-00131 Helsinki, Fi	Industry/business association	Finland
confederation of Norwegian enterprise	Industry/business association	Other: Norway an EEA country
Confederation of Swedish Enterprise	Industry/business association	Sweden
Coordinating Committee for the Associations of Manufacturers of Switchgear and Controlgear (CAPIEL)	Industry/business association	Other: CAPIEL represents 9 national associations from 8 EU countries (FR, UK, ES, DE, IT, BE, SE and AT)
Council of European Energy Regulators	Other interest group organisation/association	Other: European Union (Norway and Iceland)

Council of European Municipalities and Regions (CEMR)	Local public authority	Other: Europe
Covestro	Private company	Germany
Croatian Employers' Association- Energy Association	Industry/business association	Croatia
Czech Chamber of Commerce	Industry/business association	Czech Republic
Czech Gas Association	Industry/business association	Czech Republic
Danfoss	Private company	Denmark
Danish Energy Association	Industry/business association	Denmark
Dansk Erhverv - Confederation of Danish Enterprise	Industry/business association	Denmark
Deutsche Umwelthilfe e.V.	Non-governmental organisation (NGO)	Germany
Deutsche Unternehmensinitiative Energieeffizienz e.V. (DENEFF)	Industry/business association	Germany
Deutscher Naturschutzring	Non-governmental organisation (NGO)	Germany
Dow Europe GmbH	Private company	Netherlands
E.ON SE	Utility	Germany
E3G	Think Tank/research institute	Belgium
EDF Energy Plc	Utility	United Kingdom
EDISON	Utility	Italy
EDORA	Industry/business association	Belgium
EDSO for Smart Grids	Industry/business association	Belgium
EEF, the Manufacturers' Organisation	Industry/business association	United Kingdom
Electric Underfloor Heating Alliance (EUHA)	Industry/business association	Belgium
Electricité de France	Utility	France
Electricité Réseau Distribution France (ERDF)	Utility	France
Electricity Association of Ireland	Industry/business association	Ireland
Enagas	Private company	Spain
Eneco	Utility	Netherlands
Enel SpA	Utility	Italy
Energy & Resource Management Project Nuertingen Geislingen University	University	Germany
Energy Authority	Central public authority	Finland
Energy Cities	Other interest group organisation/association	Belgium

Energy Commission PNL Cluj	Political party/organization	Romania
Energy Norway - member organisation for Power Production, grid and Power sales	Industry/business association	Other: Norway
Energy Saving Pioneers	Non-governmental organisation (NGO)	Belgium
Energy Saving Trust	Non-governmental organisation (NGO)	United Kingdom
Energy UK	Industry/business association	United Kingdom
ENGIE SA Transparency register 90947457424-20	Utility	France
Eni S.p.A.	Private company	Italy
EnR - European Energy Network	Other: Voluntary network of 24 European Energy Agencies	Other: Majority of EnR members participated in this opinion (not DK, ES, FR, IE, LU, NL, SE)
ESD - SIC	Private company	Netherlands
ESMIG- European Smart Energy Solution Providers	Industry/business association	Other: European Association
Espoon Asunnot Oy	Utility	Finland
essenscia	Workers organisation/association/trade union	Belgium
EURELECTRIC	Industry/business association	Other: EURELECTRIC is the sector association of the electricity industry at EU level.
EuroACE (European Alliance of Companies for Energy Efficiency in Buildings)	Industry/business association	Belgium
EUROALLIAGES	Industry/business association	Belgium
EUROCHAMBRES - Association of European Chambers of Commerce and Industry	Industry/business association	Belgium
EUROFER, the European Steel Association	Industry/business association	Belgium
Eurofuel (European Heating Oil Association)	Industry/business association	Other: Eurofuel is an EU umbrella organisation representing 10 national associations and >10,000 companies
EUROGAS	Industry/business association	Other: European Union
Euroheat & Power	Industry/business association	Belgium
European Aerated Autoclaved Concrete Association (EAACA)	Industry/business association	Germany
European Alliance to Save Energy (EU-ASE)	Industry/business association	Belgium

European Association of electrical contractors	Industry/business association	Belgium
European Association of Mining Industries, Mining Ores and industrial Minerals (Euromines)	Industry/business association	Belgium
European Biomass Association (AEBIOM)	Industry/business association	Belgium
European Builders Confederation AISBL	Industry/business association	Other: EU
European Building Automation and Controls Association (eu.bac)	Industry/business association	Other: eu.bac members have subsidiaries in all EU Member States.
European Carbon and Graphite Association (ECGA)	Industry/business association	Belgium
European Centre of Employers and Enterprises providing Public Services	Industry/business association	Belgium
European Confederation of Fuel Distributors	Industry/business association	Belgium
European Copper Institute	Industry/business association	Belgium
European Council for an Energy Efficient Economy (eceee)	Non-governmental organisation (NGO)	Other: Pan-European, however secretariat based in Stockholm, Sweden
EUROPEAN ENVIRONMENTAL BUREAU	Non-governmental organisation (NGO)	Belgium
European Environmental Citizens' Organisation for Standardisation (ECOS)	Non-governmental organisation (NGO)	Belgium
European Geothermal Energy Council	Industry/business association	Belgium
European Heating Industry Association - EHI	Industry/business association	Belgium
European Industrial Gases Association AISBL	Industry/business association	Belgium
European Insulation Manufacturers Association (Eurima)	Industry/business association	Belgium
European LPG Association	Industry/business association	Belgium
European Solar Thermal Industry Federation	Industry/business association	Other: Association based in Belgium representing members from 14 Member States, + Turkey and Switzerland
European Trade Union Confederation	Workers organisation/association/trade union	Belgium
European Window Film Association	Industry/business association	Belgium

Europex - Association of European Energy Exchanges	Industry/business association	Belgium
EWE Aktiengesellschaft	Utility	Germany
FEDARENE _ European Federation of Agencies and Regions for Energy and the Environment	International organisation	Other: EU
Federal Ministry of Science, Research and Economy (BMWFV)	Central public authority	Austria
Federation of Austrian Industries	Industry/business association	Austria
FEDERCHIMICA	Industry/business association	Italy
Finnish Energy	Industry/business association	Finland
Finnish Forest Industries Federation	Industry/business association	Finland
Finnish Petroleum and Biofuels Association	Industry/business association	Finland
FIRE - Italian federation for energy efficiency	Other interest group organisation/association	Italy
Fortum Oyj	Utility	Other: We operate in electricity and heating in Nordic and Baltic countries, Poland and Russia.
Freedom Light Bulb	Other interest group organisation/association	Ireland
French Union of Electricity	Industry/business association	France
FuelsEurope	Industry/business association	Belgium
FUNDACIÓN ASTURIANA DE LA ENERGÍA	Other: REGIONAL ENERGY AGENCY	Spain
Gas Infrastructure Europe	Industry/business association	Belgium
Gaz Réseau Distribution France (GRDF)	Private company	France
GdW Bundesverband deutscher Wohnungs- und Immobilienunternehmen e.V.	Other interest group organisation/association	Germany
GEODE - The Voice of the local Energy Distributors across Europe	Industry/business association	Belgium
German Association of Local Public Utilities	Other interest group organisation/association	Germany
German Energy-Agency (dena)	Other: National Energy Agency	Germany
Gesamtverband der deutschen Textil- und Modeindustrie e. V.	Industry/business association	Germany
Glass for Europe	Industry/business association	Belgium
Göteborg Energi AB	Utility	Sweden
Green Budget Germany / Forum Ökologisch-Soziale	Non-governmental organisation (NGO)	Germany

Marktwirtschaft		
GreeningEurope.eu	Local public authority	Netherlands
Grundfos Holding A/S	Private company	Denmark
HSB Riksförbund	Private company	Sweden
Hungarian Petroleum Association	Industry/business association	Hungary
Ibec	Industry/business association	Ireland
IBERDROLA	Private company	Other: Spain, UK, Portugal
IFIEC Europe- International Federation of Industrial Energy Consumers	Industry/business association	Belgium
IGNES	Industry/business association	France
IMERYS TC	Private company	France
Inter-Environnement Wallonie	Non-governmental organisation (NGO)	Belgium
International Air Transport Association	Industry/business association	Other: Global
International Association of Lighting Designers	Industry/business association	Belgium
ista International GmbH	Private company	Germany
Italcogen-ANIMA - Italian Association of CHP System Manufacturers & Distributors in ANIMA federation	Other: Association representing businesses, professionals, research institutes interested in promoting CHP	Italy
Ivan Šerić, EU citizen from Croatia		Croatia
IWO Institut für Wärme und Oeltechnik	Industry/business association	Germany
Jenni Venäläinen, EU citizen from Finland		Finland
Jernkontoret - The Swedish Steel Producers' Association	Industry/business association	Sweden
Klima-Allianz Deutschland	Non-governmental organisation (NGO)	Germany
Koalicja Klimatyczna (Climate Coalition)	Non-governmental organisation (NGO)	Poland
Land Vorarlberg (Administration of the regional government of Vorarlberg)	Local public authority	Austria
Latvenergo AS	Utility	Latvia
Legambiente	Non-governmental organisation (NGO)	Italy
Lorcan Lyons, EU citizen from France		France
Magnesitas Navarras	Private company	Spain
Mariette Bilius, EU citizen		Netherlands

from the Netherlands		
Ministry of Economic Affairs and Communications, Republic of Estonia	Central public authority	Estonia
Ministry of Economics of the Republic of Latvia	Central public authority	Latvia
Ministry of Economy of the Slovak Republic	Central public authority	Slovakia
Ministry of Energy	Central public authority	Lithuania
Ministry of Industry and Trade	Central public authority	Czech Republic
Ministry of National Development	Central public authority	Hungary
Motiva Oy	Other: 100% state own company acting like an energy agency in Finland	Finland
National Energy Action (NEA)	Think Tank/research institute	United Kingdom
Nelfo - Industry Organization for Electrical Contractors in Norway	Industry/business association	Other: Norway
N-ERGIE Aktiengesellschaft	Utility	Germany
Norsk Hydro ASA	Private company	Other: Norway
Norwegian Ministry of Petroleum and Energy	Central public authority	Other: Norway
NVDE, Nederlandse Vereniging Duurzame Energie, Dutch Renewable Energy Council (1000 companies)	Other interest group organisation/association	Netherlands
ODE Bio-Energy platform	Non-governmental organisation (NGO)	Belgium
OFTEC	Industry/business association	United Kingdom
Opower	Private company	United Kingdom
ORGALIME - The European Engineering Industries Association	Industry/business association	Belgium
Österreichs E-Wirtschaft (Registernummer 80966174852-38)	Industry/business association	Austria
PGNiG SA (Polish Oil & Gas Company)	Utility	Poland
Pinchco bvba	Consultancy	Belgium
PKKE Polski Komitet Energii Elektrycznej – Polish Electricity Association	Industry/business association	Poland
PPD - distribucija plina d.o.o. Vukovar	Private company	Croatia
programmabureau Warmte Koude Zuid-Holland (29 stakeholders striving for	Other interest group organisation/association	Netherlands

regional heat distribution)		
Provincie Drenthe	Local public authority	Netherlands
provincie Utrecht	Local public authority	Netherlands
PU Europe	Industry/business association	Belgium
Rabih Bashroush, EU citizen from the United Kingdom		United Kingdom
RAKLI - The Finnish Association of Building Owners and Construction Clients	Non-governmental organisation (NGO)	Finland
Repsol, S.A	Private company	Spain
Republiková únia zamestnávateľov (RUZ) / National Union of Employers (NUE)	Industry/business association	Slovakia
Riksbyggen	Private company	Sweden
ROCKWOOL International A/S	Private company	Denmark
Romanian Association for Promoting Energy Efficiency – ARPEE	Non-governmental organisation (NGO)	Romania
Romanian Oil Association	Non-governmental organisation (NGO)	Romania
RWE AG	Utility	Other: Germany, Netherlands, UK, Poland, Slovak Republic, Czech Republic, Hungary, Belgium, Austria
SABO - the Swedish Association of Public Housing Companies. Represents 20% of Swedish housing stock.	Industry/business association	Sweden
Schneider Electric	Private company	Other: Global
SCHÖCK FRANCE	Industry/business association	France
SEA Save Energy Austria Gmbh	Private company	Austria
SERCE (Syndicat des Entreprises de Génie Electrique et Climatique)	Industry/business association	France
SHV Energy	Private company	Other
Slovak Association of Heat (SZVT)	Other interest group organisation/association	Slovakia
Smart Energy Demand Coalition	Industry/business association	Belgium
Stadtwerke München GmbH (SWM)	Utility	Germany
Stockholm Region Association for European Affairs	Other: Representation of Local and Regional Authorities	Sweden
Suomen Kiinteistöliitto ry	Other interest group organisation/association	Finland

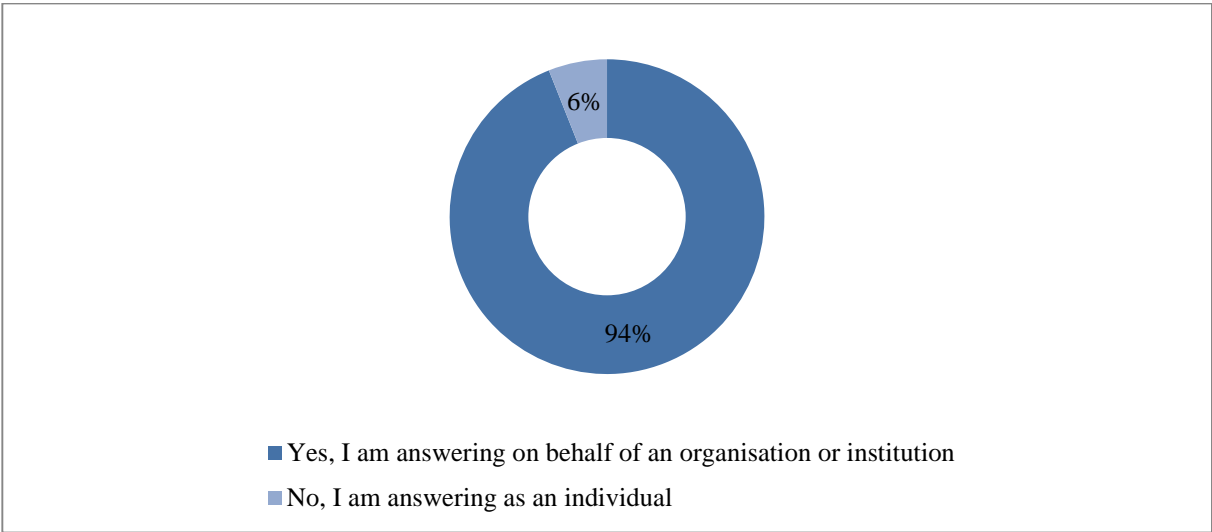
SUSI Energy Efficiency AG	Other: Energy Efficiency Investment Fund	Other: Switzerland
Svensk Energi - Swedenergy - AB (Register ID 566583188697)	Industry/business association	Sweden
Swedish Construction Federation (Sveriges Byggindustrier)	Industry/business association	Sweden
Swedish District Heating Association	Industry/business association	Sweden
Swedish Union of Tenants, SUT	Non-governmental organisation (NGO)	Sweden
The associations of the local authorities of Bavaria, Baden-Württemberg and Saxony	Local public authority	Germany
THE Bellona Foundation	Non-governmental organisation (NGO)	Other: Norway
The CELSIUS project	Other: An EU-funded project	Sweden
The Community of European Railway and Infrastructure Companies (CER)	Industry/business association	Belgium
The Confederation of Danish Industry. DI is Denmark's largest trade organisation.	Industry/business association	Denmark
The Danish Ecological Council	Non-governmental organisation (NGO)	Denmark
The European Federation of Intelligent Energy Efficiency Services	Industry/business association	Belgium
The European Partnership for Energy and the Environment (EPEE)	Industry/business association	Belgium
The Federation of Finnish Technology Industries	Industry/business association	Finland
The Norwegian Association of Electrical Wholesalers, Manufacturers and Producers (EFO)	Industry/business association	Other: Norway
thyssenkrupp AG	Private company	Other: headquartered in Germany, thyssenkrupp is globally active including 24 EU Member States
TOTAL SA	Private company	France
UEPC	Industry/business association	Other: UEPC has members within the European Union and outside.
Umweltdachverband	Non-governmental organisation (NGO)	Austria
UNESID. Spanish Steel	Industry/business association	Spain

Association		
UNIDEN (UNION des InDustries utilisatrices d'ENERgie)	Industry/business association	France
Union Internationale de la Propriété Immobilière - UIPI EU Transparency Register: 57946843667-42	Non-governmental organisation (NGO)	Belgium
UPEI (The Union of European Petroeum Independents)	Industry/business association	Other: UPEI represents 11 national associations and 5 companies from 15 European countries
Vattenfall AB	Utility	Sweden
VDMA - The German Engineering Association	Industry/business association	Germany
VELUX A/S (VELUX Group)	Private company	Denmark
Veolia	Private company	France
Verband Beratender Ingenieure VBI	Industry/business association	Germany
Verband der Chemischen Industrie e.V	Industry/business association	Germany
Verband kommunaler Unternehmen Österreichs (VKÖ)	Industry/business association	Austria
VIPA International - Vacuum Insulation Panel Association	Industry/business association	Belgium
VNCI	Industry/business association	Netherlands
Wien Energie GmbH	Utility	Austria
Wienerberger AG	Private company	Other: International company with production facilities in most EU countries
WWF European Policy Office	Non-governmental organisation (NGO)	Belgium
ZERO - Associação Sistema Terrestre Sustentável	Non-governmental organisation (NGO)	Portugal

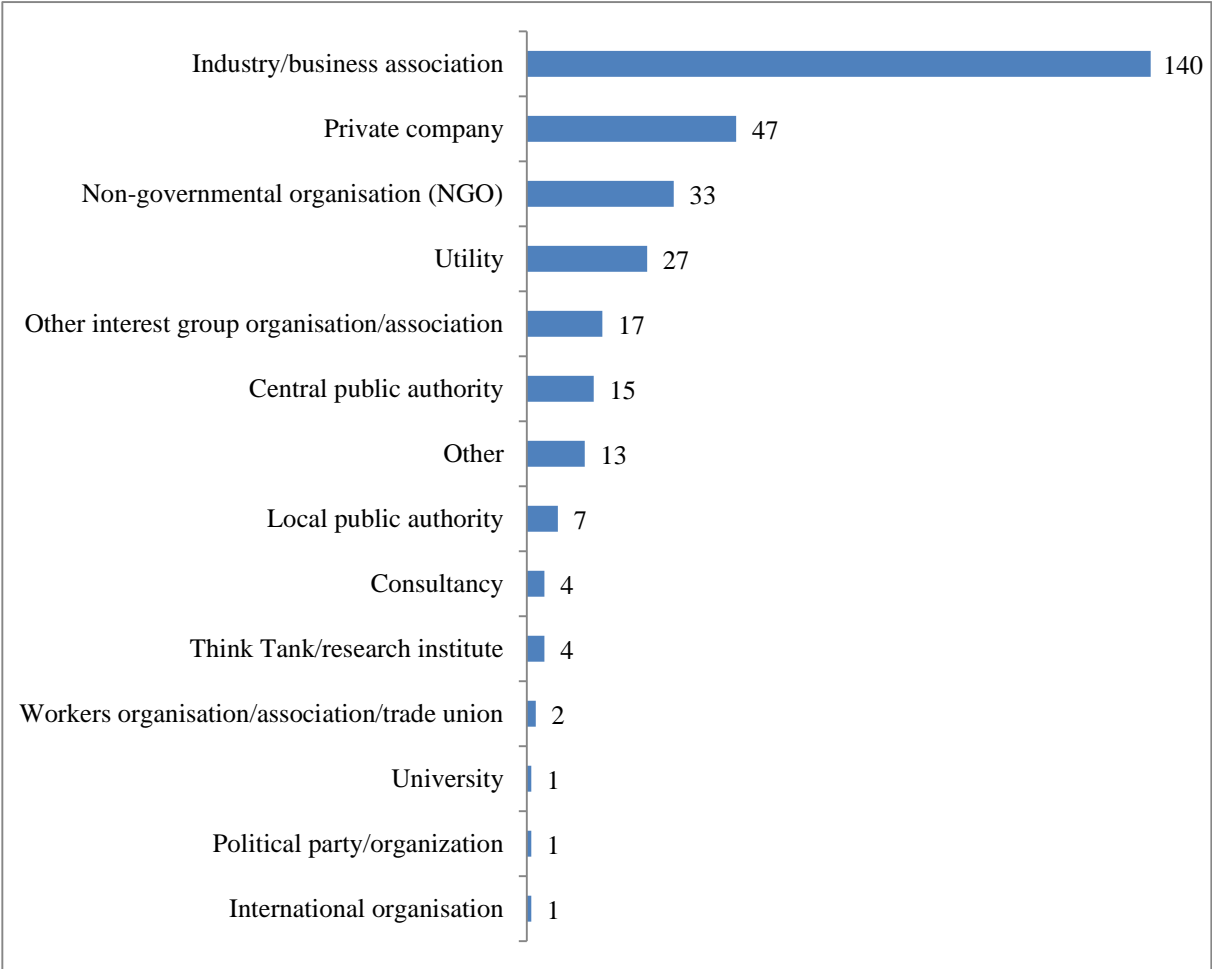
Annex II: Statistical overview of online survey participants

This statistics capture all participants who submitted contributions to the online survey as of 9 February 2016. They exclude all participants who only submitted non-online survey based responses.

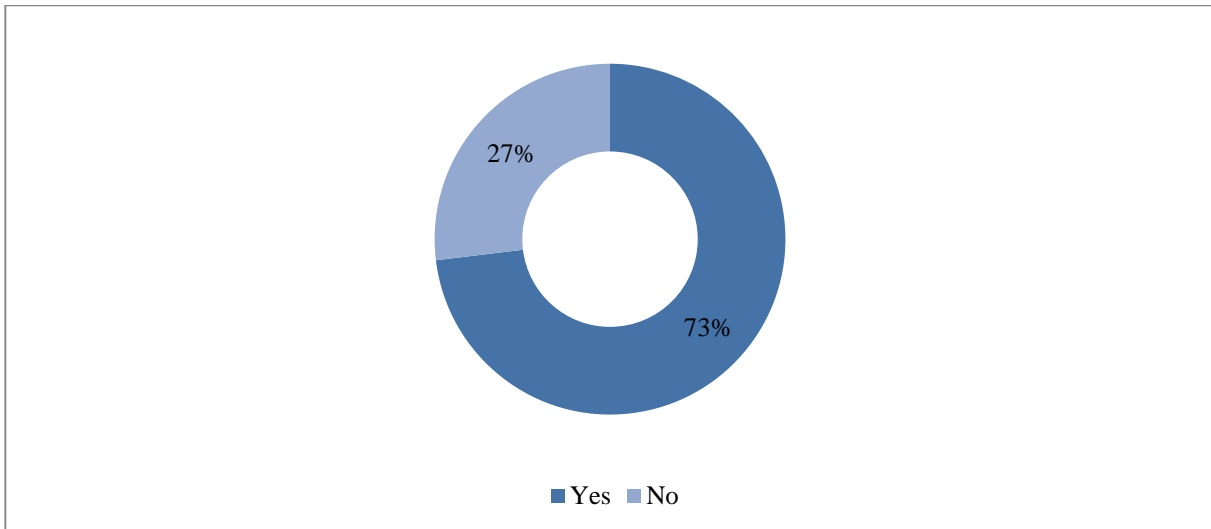
Are you answering on behalf of an organisation or institution?



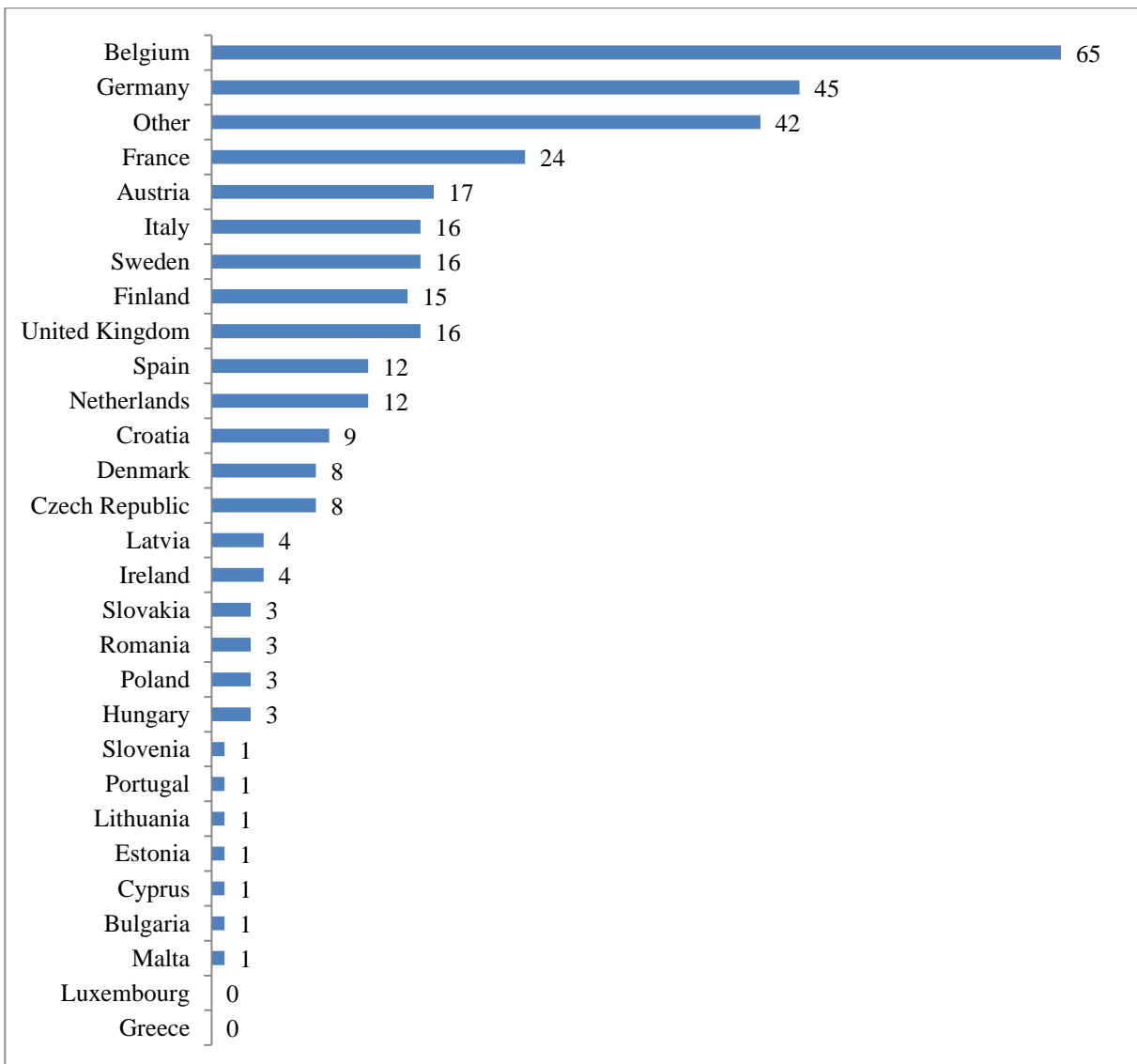
If you are answering on behalf of an organisation or institution, please specify which category best describes your organisation or institution.



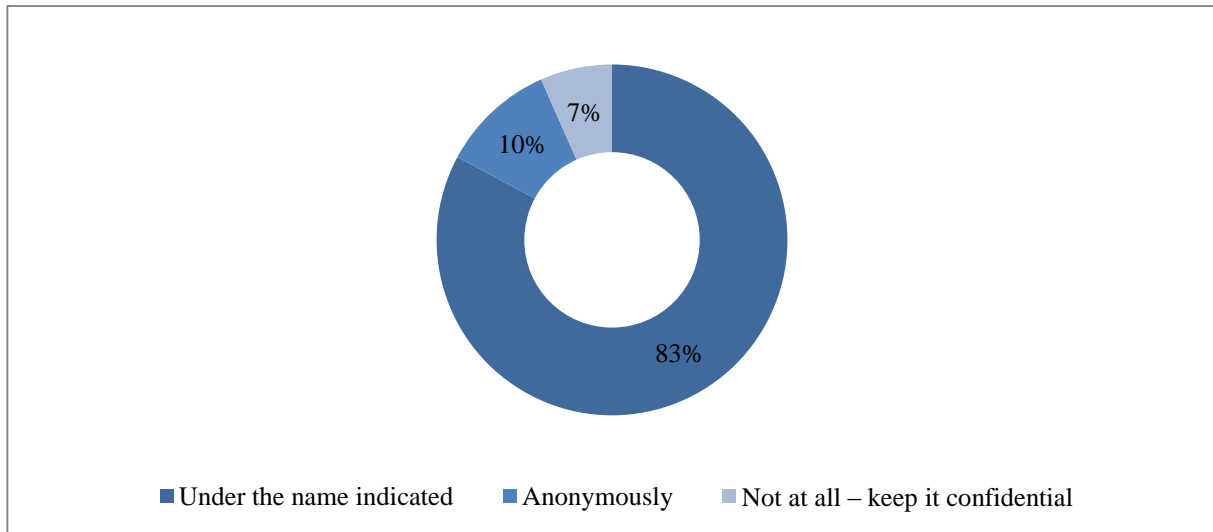
Does your organisation or institution primarily deal with energy issues?



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



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



Annex III: Survey questions

Part I – General questions

1. Articles 1 and 3: Overarching issues, scope and target

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

Free text (1000 characters maximum)

- 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?

Free text (1000 characters maximum)

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

Free text (1000 characters maximum)

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

Free text (1000 characters maximum)

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

Free text (1000 characters maximum)

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

Free text (1000 characters maximum)

- 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)

- 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 (please specify)

2. Article 6: Public procurement

- 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 characters maximum)

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

Free text (1000 characters 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 characters 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

If yes, how useful have they been to increase awareness? Please describe.

Free text (1000 characters maximum)

3. Article 7: Energy efficiency obligation schemes

- 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 characters maximum)

- 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 characters 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.

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 (please specify)

- 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 characters maximum)

- 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 characters maximum)

4. Article 9-11: Metering and billing

- 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 characters 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 characters 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 characters 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 characters 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 together provide a sufficient level of harmonisation at EU level?

Yes

No

No opinion

Please explain your answer (1000 characters maximum)

If no, do you think the common minimum functionalities should be the basis for further harmonisation?

Yes

No

No opinion

Please explain your answer (1000 characters 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?

Free text (1000 characters maximum)

5. Article 20: Finance

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

Free text (1000 characters maximum)

- 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)

- 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: Monitoring

- 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 yes, why is it a useful tool?

Free text (1000 characters maximum)

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

Free text (1000 characters maximum)

- 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 characters 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 characters maximum)

Part II – Technical questions

7. Article 6: Public procurement (continued)

- 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 characters 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 specify)

Please explain your answer (1000 characters 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 characters 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 characters 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?

Free text (1000 characters maximum)

8. Article 7: Energy efficiency obligation schemes (continued)

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 characters maximum)

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

	<i>Strongly agree</i>	<i>Agree</i>	<i>Disagree</i>	<i>Strongly disagree</i>	<i>No opinion</i>
<i>Lower energy bills for consumers</i>					
<i>Better awareness of energy efficiency potential by consumers</i>					
<i>Better relationship between energy suppliers, distributors and customers</i>					
<i>Lower energy generation (and transmission) costs for the utilities</i>					
<i>Improved business and administrative environment for up-coming innovative energy services</i>					
<i>Aggregation of small-scale investments (pooling/bundling)</i>					
<i>Development of new financing models – e.g. energy performance contracting</i>					
<i>Stimulation of energy efficient renovation of buildings</i>					
<i>Increased competitiveness in the energy markets</i>					
<i>Other (please specify)</i>					

Please explain your answer (1000 characters 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 characters 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.

Free text (1000 characters maximum)

- 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):

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

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 count savings towards the next obligation period (paragraph 7(c))

Other (please specify)

Please explain your answer (1000 characters maximum)

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 (please specify)

Please explain your answer (1000 characters maximum)

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 specify)

Please explain your answer (1000 characters 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?

	<i>Strongly agree</i>	<i>Agree</i>	<i>Disagree</i>	<i>Strongly disagree</i>	<i>No opinion</i>
<i>Calculation methods</i>					
<i>Materiality</i>					
<i>Additionality</i>					
<i>Lifetimes</i>					
<i>Price demand elasticities for taxation measures in real terms</i>					
<i>Indicative list of eligible energy saving measures</i>					
<i>Monitoring and verification procedures</i>					
<i>Reporting</i>					
<i>Other (please specify)</i>					

Please explain your answer (1000 characters maximum)

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

Free text (1000 characters maximum)

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

Free text (1000 characters 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?

Free text (1000 characters maximum)

- 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?

Free text (1000 characters maximum)

- 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 characters maximum)