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15 May 2017

RE: Designing energy efficiency policy that benefits consumers

Dear Energy Attaché,

I write on behalf of BEUC, The European Consumer Organisation, in view of the upcoming Informal Meeting in Malta where Energy Ministers will discuss energy efficiency proposals under the 'Clean Energy for All Europeans' package. We call on you to push for an ambitious 2030 energy efficiency policy which is necessary to ensure affordable and sustainable energy services for consumers.

The ongoing revision of energy efficiency legislation provides an opportunity to create new jobs, increase Europe's energy security and contribute to achieving targets set out in the Paris Agreement. It can help consumers get their energy bills under control, make their homes comfortable and lift millions of people out of energy poverty. For future energy efficiency measures to deliver to consumers, we encourage you to look at the benefits of higher ambition in the energy efficiency files under discussion, particularly the Energy Efficiency Directive. To be successful and bring benefits to consumers, energy efficiency policy must:

Be flexible but without loopholes.

Although the greatest potential for energy efficiency gains is in buildings, transport should be included in the baseline calculation of energy efficiency.

Counting energy generated on-site from renewable sources towards a buildings' energy savings should not be allowed. This exemption may undermine the overall energy efficiency objective.

Deliver long term savings.

BEUC supports the extension of energy savings obligations beyond 2020 without setting a new sunset clause. We believe that the Energy Efficiency Directive's Article 7 on energy savings obligations allows for sufficient flexibility for different design options within Member States. Therefore, lowering the ambition of this scheme, particularly decreasing annual savings target to 1.4% under Article 7, is worrying.

Benefit all, including energy poor households.

There is a risk that the cost of developing incentives for proactive consumers is shifted to consumers who in practice do not have the necessary funds and are often in a vulnerable situation. Although the responsibility for protecting energy poor and vulnerable consumers lies with Member States, the EU should act and manage the impact of energy efficiency policy on energy poverty. Extra support is necessary to assist energy poor consumers. At the same time, tenants representing 30% of the

EU population should not be left behind and should also have access to tailored measures and incentives.

Trigger financing for energy efficiency solutions.

Financing energy efficiency should be among Europe's priorities. All consumers should have access to better financing possibilities to renovate their homes. The discussion on energy efficiency investments at the Informal Meeting will concern mainly those consumers who live in publicly owned buildings and are underserved because of accounting rules and administrative barriers. We therefore urge you to find solutions to these administrative hurdles in order to secure access to energy efficiency investments for all.

We hope you will be able to take our views into consideration and we remain at your disposal for any question you may have.

Yours sincerely,

Monique Goyens
Director General