

The Consumer Voice in Europe

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Brussels, 13 December 2017

Subject: BEUC's recommendations on revised Energy Performance of Buildings Directive

Dear Deputy Ambassador,

I am contacting you on behalf of BEUC, The European Consumer Organisation, to share with you our views on electro-mobility infrastructure and the smartness indicator ahead of the next week's trilogue meeting on the Energy Performance of Buildings Directive (EPBD).

We consider revised EPBD as an excellent opportunity to accelerate the roll-out of recharging infrastructure and in this way help to make electro-mobility a more convenient and accessible transport option for consumers. The availability of charging points in buildings is indeed one of the major hurdles for consumers when switching to zero-emission vehicles. In addition, the smartness indicator measuring flexibility features and enhanced functionalities of buildings requires further investigation with regards to the scope, definition and communication to consumers to make this indicator a useful tool for consumers.

We therefore urge you to strengthen the level of ambition shown by the different negotiators so far. We would like you to take especially into consideration the following aspects for upcoming trilogue meeting:

- **Limit the exemption of small and medium-sized enterprises from the application of provisions for non-residential buildings to 'small and micro-sized enterprises' only.** 99.8% of enterprises in the EU are SMEs. Exempting all of them from applying the e-mobility provisions would significantly reduce the level of ambition and fall short in satisfying user needs.
- **Ensure that charging points installed in new and substantially renovated non-residential buildings are capable of 'starting and stopping in reaction to price signals' within the meaning of the AFI Directive 2014/94/EU.** This is in line with both the European Commission's initial proposal as well as the Council's general approach. The ability of charging infrastructure to control the charging process is key for integrating high numbers of electric vehicles into the electricity system. At the same time, it will help to optimise the electricity consumption of buildings and reduce charging costs for consumers.

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- **Restrict the exemption possibilities to the installation of recharging and ducting installations in existing buildings undergoing major renovation.** The application of pre-equipment provisions to major renovations should only be limited to those encompassing the parking or the electrical infrastructure of the building. Any additional exemption or threshold would risk considerably delaying the installation of recharging equipment in existing buildings.
- **Introduce the smartness indicator only on a voluntary basis.** We strongly believe that consumer understanding and expectations of "smart" requires further research. As the preliminary consumer engagement work has not been done, we are concerned about the usefulness of such indicator for consumers. In particular, if the methodology of smartness indicator is too prescriptive, there may not be sufficient flexibility to design consumer engagement needs into this indicator. Questions remain around the way this indicator will be communicated to consumers. The indicator is expected to be connected to the energy performance certificates which may further increase consumers' confusion about these certificates. The more assumptions are made in assigning a value to the indicator, the less relevant it may become to the individual consumer.

Thank you very much for considering these recommendations during the final negotiations.

We remain at your disposal should you require any further information.

Yours sincerely,

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