



Union Française de l'Électricité

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UFE answers the EC consultation on the Roadmap on the review of Directive 2012/27/EU on energy efficiency (EED)

The Directive 2012/27/EU on energy efficiency (EED) is a key tool to reduce energy consumption, and accompanied by an ambitious electrification, and the deployment of renewable energy sources, it will help meet the EU's climate and energy objectives. The EED was recently revised in 2018 and is currently in its implementation phase, **UFE regrets that the issue of climate efficiency was not taken into account** at the time. Considering the EC pledge to raise the 2030 target to reduce GHG emissions by at least 55%, **it is of utmost importance to make the EED consistent with this objective.**

Instead of reviewing upwards the 2030 overall energy efficiency (EE) target, UFE believes it is essential to increase the implementation of EE measures in the EED. Indeed, early assessments show that most of the National Energy and Climate Plans (NECPs) do not plenty assess whether the national policies are sufficient to reach the 2030 EE target and that Member States (MS) run the risk of not meeting their target.

UFE thus supports a **combination of Options 2 and 3** and believes the EED revision should focus on **aligning the Directive with the climate objectives and adopting a more climate-efficiency centric approach.**

The EED needs to encourage the switch to low-carbon energies. **The objective of reducing GHG emissions should be at the core of energy policy** as energy savings alone do not systematically correspond to a significant reduction in GHG emissions. This ambition is not concretely addressed in the Roadmap.

More synergies need to be introduced between the EED and other Green Deal initiatives so that concrete measures in sectors with the greatest potential for energy savings such as buildings and transport are taken. The EED must be revised in conjunction with the **Renovation Wave (RW)** to decarbonise the EU building stock and



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the Energy Performance of Buildings Directive (EPBD). For instance, the **development of smart meters** in buildings supported by the EC should be addressed in both the EED and the RW as they help increase the participation of customers to the electricity markets by notably providing access to data on final energy consumption and demand response services. The EED and RW should also assess the need and the efficiency of a deep renovation based on consumption data. Finally, the EED should acknowledge the importance of charging infrastructures' deployment in line with the provisions of EPBD, to bring efficiency to the system.

Therefore, UFE believes the review of the EED should:

- Enshrine the objective of carbon neutrality in art. 1 and 3 with a **greater consistency between EE savings and climate objectives to reduce GHG emissions**
- **Improve the Energy Efficiency Certificates (EECs) tool** by including a CO2 component
- **Encourage MS to set national targets for the reduction of energy consumption by 2030** according to their specificities and taking a year of reference.
- **Prioritise efficient and low-carbon technologies**
- **Create EE objectives for transport to reduce GHG emissions in modes of transport, such as maritime, which are not covered by EU CO2 legislations** (thus not those concerned by Regulations (EU) 2019/631 and 2019/1242)
- **Prioritise the renovation of public buildings in conjunction with the RW by extending art. 5** to all public buildings (not only those owned and occupied by central government). The EC should also set a **new goal in terms of energy consumption rather than only in terms of renovated area in the EED to set up a safeguard for GHG emissions.**
- **Support the development of smart meter solutions (art. 9), reinforce the access of consumers to their data and their use**, and foster the uses of already existing smart meters functionalities for energy consumption management



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- **Add a reference to final energy consumption in the billing information** and simplify the information available to raise awareness and visibility among customers and help them having a better understanding of their energy bills and savings (art. 10 and 11)