

# 2nd Position Paper 2/2005

## Proposal for a Directive on energy end-use efficiency and energy services\*

*FEDARENE is the premier European network of regional and local organisations which implement, co-ordinate and facilitate energy and environment policies. Regional and local agencies, ministries and departments working in these fields, are represented in F E D A R E N E .*

*FEDARENE, a non-profit association set up in 1990 at the initiative of six European regions, now has 65 member regions from fifteen European Union countries*

FEDARENE welcomes the initiative of the European Commission to propose a directive on energy end use efficiency and energy services and FEDARENE points out that the regional actors will play a role for a successful implementation of this directive.

FEDARENE underlines the necessity of mandatory targets for energy efficiency improvements which will lead to a stable and clear framework for energy efficiency measures.

Whereas the time frame for the directive should be nine years from 2006 until 2015, the mandatory targets for energy efficiency improvements should be at least 3% in the first three years, at least 4% in the next three years, and at least 4.5% in the three years after. For the public sector the minimum target should be at least 4.5% in the first three years, at least 5.5% in the next three years and finally at least 6% in the three years after.

In addition to the overall assessment FEDARENE gives the following comments to certain detailed aspects of the directive:

1. Different target levels for individual member states might be an option, provided that the overall target for the whole union is met. The decision on the different target levels might be decided within one year after entry into force of the directive, if no agreement is reached, the uniform target shall apply for all member states.
2. The Directive shall include provisions that include energy efficiency and environmental criteria in public procurement rules, to allow the public sector to fulfil its energy efficiency target. To enable the public sector to reach its energy efficiency targets, it is crucial that member states provide a regulatory framework and financial instruments for energy savings.
3. FEDARENE acknowledges that energy distribution and retail energy sales companies can play a role in the development of energy efficiency services. The directive has to ensure that a framework for an energy efficiency market is developed that allows all market actors to provide energy services and programs and does not give advantages to the energy distribution and retail sales industry.
4. FEDARENE considers that the recovery of costs by energy distribution companies for energy efficiency measures through the distribution tariffs may give an unfair advantage compared to other energy service providers and that cost recovery may only be granted for energy efficiency programs as defined in the directive.
5. FEDARENE welcomes, that funds for the development of the market may be established. Special focus of the funds should be given on enabling activities that help in creating the framework for energy services rather than direct subsidies to individual activities. These funds should be managed by governmental organisations or agencies on regional level.
6. FEDARENE considers that monitoring of the results obtained by the implementation of measures described in the directive is important. The intervals of reporting by the member states on the results must ensure that measures can be imposed if the target levels described above are unlikely to be reached. Reporting should be made in intervals of three years.

(\*) Doc 12261/03 ENER 362 CODEC 1858

**FEDARENE aisbl**

11 rue du Beau-Site  
B - 1000 Bruxelles

Tel 32/2 646 82 10 Fax 32/2 646 89 75  
fedarene@fedarene.org  
www.fedarene.org