AmCham EU's response to the consultation on the Review of Directive 2012/27/EU on Energy Efficiency

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CONSULTATION RESPONSE

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Introduction

Given the recent implementation date of the EED, this consultation focuses on examining the following elements of Directive:

- **Article 1 (subject matter and scope) and Article 3 (energy efficiency target):** As required by the European Council of October 2014, which agreed the EU objective of saving at least 27% of energy by 2030 compared to projections and requested the Commission to review the target by 2020 *"having in mind [a level of savings of] 30%"*.
- **Article 6 (purchasing by public bodies of energy efficient buildings, goods and services):** As required by the reporting obligation under Article 24(8) to review the effectiveness of implementation of Article 6.
- **Article 7 (energy efficiency obligation schemes):** As required by the reporting obligation under Article 24(9) on the implementation of Article 7 and the need to address the obligation period that will expire after 2020.
- **Articles 9 – 11 (metering, billing information and cost of access to metering and billing information):** Consumer related aspects touched upon in these Articles are also addressed in the Internal Market Design/Delivering a New Deal for Energy Consumers initiative launched in parallel.
- **Article 20 (energy efficiency national fund, financing and technical support):** The European Fund for Strategic Investments (Junker Plan) raises the importance to address the market gaps for energy efficiency investments.
- **Article 24 (reporting and monitoring and review of implementation):** Given the new governance system to be introduced under the Energy Union in view of 2030 framework, currently being prepared in parallel to this exercise.

Against this background, questions of a general nature for the general public are included in Part I. A set of questions of a technical nature for a more expert public is included in Part II. Respondents are invited to reply within the two parts to all the questions they consider relevant.

Information about the respondent

***Are you answering on behalf of an organisation or institution?**

- Yes, I am answering on behalf of an organisation or institution
- No, I am answering as an individual

***If you are answering on behalf of an organisation or institution, please enter the full name of your organisation or institution:**

American Chamber of Commerce to the European Union (AmCham EU)

***If you are answering on behalf of an organisation or institution, please enter your full name and position title:**

Stéphanie Brochard, Policy Officer

***Please enter your email address:**

sbr@amchameu.eu

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

- ○ Central public authority
- ○ Local public authority
- ○ Private company
- ○ Utility
- ○ International organisation
- ○ Workers organisation/association/trade union
- ○ Non-governmental organisation (NGO)
- ○ Industry/business association
- ○ Other interest group organisation/association
- ○ Consultancy
- ○ University
- ○ Think Tank/research institute
- ○ Political party/organization
- ○ Other (please specify)

***Does your organisation or institution primarily deal with energy issues?**

- ○ Yes
- ○ No

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

○ Austria	◉ Belgium	○ Bulgaria
○ Croatia	○ Cyprus	○ Czech Republic
○ Denmark	○ Estonia	○ Finland
○ France	○ Germany	○ Greece
○ Hungary	○ Ireland	○ Italy

○ Latvia	○ Lithuania	○ Luxembourg
○ Malta	○ Netherlands	○ Poland
○ Portugal	○ Romania	○ Slovakia
○ Slovenia	○ Spain	○ Sweden
○ United Kingdom	○ Other (please specify)	

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

- ◉ Under the name indicated (I consent to publication of all information in my contribution and I declare that none of it is under copyright restrictions that prevent publication)
- ○ Anonymously (I consent to publication of all information in my contribution and I declare that none of it is under copyright restrictions that prevent publication)
- ○ Not at all – keep it confidential (my contribution will not be published, but it will be used internally within the Commission)

Part I – General questions

Article 1: Subject matter and scope and Article 3: Energy efficiency target

Article 1 provides the general framework for the promotion of energy efficiency within the Union in order to ensure the achievement of the EU 20% energy efficiency headline target by 2020. In addition and more specifically, **Article 3** requires that each Member State sets an indicative national energy efficiency target based on either primary or final energy consumption, primary or final energy savings or energy intensity. In setting the targets, Member States should take into account a number of provisions set out in Article 3(1).

As regards the EU energy efficiency target for 2030, the European Council agreed in October 2014 on an indicative target at the EU level of at least 27% (compared to projections) to be reviewed by 2020 having in mind an EU level of 30%. Therefore, the existing policy framework should be updated to reflect the new EU energy efficiency target for 2030 and to align it with the overall 2030 Climate and Energy framework.

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

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?

We recommend that the Europe Commission makes better use of synergies between Energy Efficiency Directive (EED), Energy Performance of Buildings Directive (EPBD), Renewable Energy Directive (RED) and Eco-design Directive. In a nutshell, the following key improvements and synergies of existing legislation offer major potential to increase the energy performance of buildings and indirectly, achieve the EU energy efficiency target for 2030:

- EED Art 8 should include the obligation to implement the recommendations resulting from the Energy Audits.
- Energy Audits under EED Art 8 should be used to assess technical building systems and fulfilment of maintenance requirements (EPBD Art 4, 8, 14/15).
- Nearly zero energy buildings (nZEB) requirements under EPBD Art 9 should first be extended to all public buildings (EED Art 6 and 5) and secondly to all renovations (EED Art 4). Furthermore, the Commission should use EPBD Art 12 definition for public buildings in EED (Art 5).

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

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

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

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

The EU should ensure that all EU legislation having the potential to achieve energy savings – EED, EPBD and RED – is coherent and correctly implemented (see answer 1.2).
The governance system of the Energy Union foresees a comprehensive reporting of national energy plans by the Member States. The EU will have a very important role in making sure that these plans fit with the overall Energy Union and that they meet the EU legislative requirements. Seen in the overall context, the governance system should allow the Commission to follow national implementation and enforcement of EU legislation, particularly on energy efficiency, which will now feature as a part of the overall energy plan.

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)

Article 6: Purchasing by public bodies of energy efficient buildings, goods and services

One of the objectives of the EED is to improve and strengthen energy efficiency through public procurement. **Article 6** of the Directive states that Member States shall ensure that central governments purchase only products, services and buildings with a high energy-efficiency performance. The central governments of the Member States should "lead by example" so that local and regional procurement bodies also strengthen energy efficiency in their public procurement procedures.

The Commission is carrying out an assessment of Article 6 of the EED and the preliminary findings show a rather limited experience in the Member States so far in implementing the requirements of Article 6. One of the main barriers to implementing the requirements is the lack of clarity and guidance across the existing EU rules on public procurement. On the other hand, experiences in some Member States indeed demonstrate that the measures required by the EED on public procurement have helped to educate and involve procurement bodies in the use of energy efficiency criteria, spreading the exemplary role of central governments also at regional and local levels.

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

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

The requirements of Article 6 should be extended to all public authorities, and clear performance levels should be set for buildings. All buildings newly built or rented by public authorities should meet Nearly Zero Energy standards by 2018 as required in EPBD.

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

No

Please explain your answer:

Energy efficiency is not yet systematically integrated into public procurement processes. A clear target exists for nZEBs within EPBD: all new public buildings must reach a Nearly Zero Energy level from 2019 onwards. This target should be applied to all public buildings in EED. Moreover, this represents a good opportunity to establish coherence between EED and EPBD, and provide a clear definition and guidance regarding calculation methodologies for nZEBs (eg, the use of on-site renewable energy sources as Heat Pumps).

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?

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

Article 7: Energy efficiency obligation schemes

Article 7 together with Annex V requires that Member States set up an energy efficiency obligation scheme to ensure that obligated parties (energy distributors and/or retail energy sales companies that are designated by each Member State) achieve a given amount of energy savings (1.5% annually) from annual energy sales to final customers over the period 2014 to 2020. As an alternative to setting up an energy efficiency obligation scheme, Member States may opt to take other policy measures to achieve energy savings among final customers to reach the same amount of savings.

The Commission is required to assess the implementation of this Article and submit a report by 30 June 2016 to the European Parliament and the Council, and, if appropriate, to supplement the report with a legislative proposal for amendments.

In line with the EED, Member States had to notify the measures and methodologies on implementation of Article 7 by 5 December 2013. Further information from Member States was received in the notified National Energy Efficiency Action Plans (due by April 2014).

According to the latest available information from the notifications received from Member States[1], 16 Member States notified an energy efficiency obligation scheme by putting an obligation on utilities to reach the required cumulative energy savings by 2020 under Article 7. Four Member States out of these (Bulgaria, Denmark, Luxembourg and Poland) will use it as the only instrument to achieve the required energy savings. 12 Member States (Austria, Croatia, Estonia, France, Ireland, Italy, Latvia, Lithuania, Malta, Slovenia, Spain and United Kingdom) will use the obligation scheme in combination with alternative measures. On the other hand, 12 Member States (Belgium, Cyprus, Czech Republic, Germany, Greece, Finland, Hungary, Netherlands, Portugal, Romania, Slovakia and Sweden) have

[1] http://ec.europa.eu/energy/en/topics/energy-efficiency-directive/obligation-schemes-and-alternative-measures

opted to only use the alternative measures to reach the required savings instead of putting obligations on utilities.

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

Please explain your answer:

In France, 90.1% of operations to implement Article 7 were performed in the building sector. The government notified the Commission of the following energy saving initiatives, with the first four showing positive results in the building sector:

- The Energy Savings Certificates;
- The Sustainable Development Tax Credit;
- The 0% interest rates Eco-Loan;
- Energy Passports & Renovation Guarantee Fund;
- Raise of the domestic CO2 consumption fiscal rates;
- The Eco-tax for trucks;
- The load management bonus for electricity networks operators.

Another very good example is the tradable instruments such as the White Certificates used in Italy, sharing evidence of the benefits of final energy savings through energy efficiency.

A study conducted by Ricardo Consulting on the implementation of Article 7 demonstrates that measures taken at the national level focus on the building sector. 48% of expected and notified energy savings will come from improvements made in buildings.[2]

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

Yes

Please explain your answer:

As mentioned above, Article 7 played a key role in delivering energy savings in the building sector. Moreover, it is the only article in the EED which holds Member States accountable to a measurable and significant outcome, while allowing for some flexibility in the choice of instruments. This is why we recommend to delete the 'sunset clause' and extend the article beyond 2020. This will incentivise the creation of long-term measures and national schemes to deliver energy savings.

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.

[2] http://rekk.hu/downloads/projects/Final%20Report%20on%20Article%207%20EED.pdf

- 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

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

Articles 9-11: Metering, billing information and cost of access to metering and billing information

Articles 9-11 deal with consumer empowerment, by asking Member States to put in place requirements about metering, access to billing information and cost of access to metering and billing information, allowing consumers to make decisions about their energy consumption. These issues are also currently

being looked at within the Electricity Market Design/Delivering a New Deal for Energy Consumers initiative. It may be relevant to consider certain aspects of these Articles in the EED review. The same is true for the subject of "demand response" (as set out in paragraph 8 of Article 15, but on this topic explicit questions were already included in the Market Design consultative communication published in July 2015).

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)?

Smart meters contribute to the proper implementation of the EPBD and achievement of EU energy efficiency goals. However they are not enough as they work autonomously. Instead, intelligent controls systems contribute to meeting energy efficiency targets by providing data from all installed equipment. This system approach ensures that the input from each equipment is taken into account, measured and then connected to the right action by the occupants.
Intelligent control systems also enable demand response by activating all devices according to the building's needs. Unfortunately, consumers do not have enough information today on the potential of controls. The EU can help by providing a clear definition and raising awareness at the national level.
We believe the smart metering model should be further extended from private households to utilities, to help them manage more efficiently the integration of renewables into the energy system, better controlling and avoiding fluctuation problems.

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?

A key feature of a smart metering is that it gathers data generated by many sensors: data on energy use, equipment performance, occupant behaviour etc. Hence, a common communication protocol for these sensors, both wired and wireless, needs to be defined and deployed. Similarly, a common open communication protocol between the different equipment used in a building would facilitate integration and interoperability.

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

See above.

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

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[3] together provide a sufficient level of harmonisation at EU level?

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

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?

Article 20: Energy efficiency national fund, financing and technical support

The analysis of the July 2014 Energy Efficiency Communication and the recent EEFIG Report[4] showed that the energy efficiency investment market is still relatively small scale compared to its potential or the volumes needed to meet the EU's 2030 objectives. The European Structural and Investments Funds address the market gaps related to investment projects including those in energy efficiency, and the European Fund for Strategic Investments provides EU guarantee for investment projects – including those for energy efficiency**.** The European Energy Efficiency Fund carries relevant lessons.

Moreover, significant funding for energy efficiency comes from national public sources and the private sector. The effectiveness and impact of energy efficiency investments funding strongly depends (*inter alia*) on the implementation of the energy efficiency legislation, including the EED.

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

Today, incentives for energy efficiency, as well as technologies using renewable energy are treated separately, without taking into account the overall building's consumption and how to reduce demand. In reality, the two incentives could be combined into one energy efficiency incentive system, based on a single energy efficiency calculation from external energies.

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

Yes

If yes, specify your answer from the below list:

Building renovation

[3] C(2012)1342

[4] EEFIG - Energy Efficiency Financial Institutions Group Report: Energy Efficiency – First fuel for the EU economy, 2015, www.eefig.eu

- 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

Article 24: Reporting and monitoring and review of implementation

The Energy Union Strategy foresees an integrated governance framework for EU energy and climate policies to ensure that agreed climate and energy targets are reached and to enable Member States to better coordinate their policies at a regional level.

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?

No

If yes, why is it a useful tool?

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

The national reports stemming from EED (and also EPBD) should be streamlined and harmonised so that stakeholders can better understand the national situation and compare energy policy choices in various Member States. It would also improve the understanding if all EU regulation is properly implemented and enforced. The planned governance system of the Energy Union could bring in a streamlined reporting of Member States' whole energy plans – that would also highlight how energy

efficiency legislation needs to be part of the whole national energy plan and to be taken into account when any new energy infrastructure and policy priorities are decided.

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)[5] under Annex XIV (1)(a)) of the EED should be simplified?

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?

Part II – Technical questions (on Articles 6 and 7)

Article 6: Purchasing by public bodies of energy efficient buildings, goods and services

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.

Please explain your answer:

There should also be clear guidance on how such procurement should be done, how energy efficiency should be measured to ensure technology neutrality and that the cost of the energy consumption of the 'use phase' is included.

7.2. In your view, what are the main barriers that are 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)

[5] In the year before last [year X(1) – 2], where "X" is the current year.

- 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

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?

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

No (See question 2.3)

Please explain your answer:

Regarding services – the energy efficiency of equipment is maintained through regular servicing and maintenance. This should be taken into account when public authorities tender for technical building systems or entire buildings, and should be included in the contract. For efficiency improvement data, see FEDENE-Cardonnel study. (http://www.planbatimentdurable.fr/la-fedene-presente-une-etude-sur-la-renovation-a796.html)

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?

Article 7: Energy efficiency obligation schemes

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?

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

	Strongly agree	Agree	Disagree	Strongly disagree	No opinion
Lower energy bills for consumers					

Better awareness of energy efficiency potential by consumers					
Better relationship between energy suppliers, distributors and customers					
Lower energy generation (and transmission) costs for the utilities					
Improved business and administrative environment for up-coming innovative energy services					
Aggregation of small-scale investments (pooling/bundling)					
Development of new financing models – e.g. energy performance contracting					
Stimulation of energy efficient renovation of buildings					
Increased competitiveness in the energy markets					
Other					

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?

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.

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?

See question 3.2

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)

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

Yes

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)

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 (eg, in district networks)
- Savings from energy management systems
- Energy savings from better organisation of activities
- Other (please specify)

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?

Provision of Article 7/Annex V	Strongly agree	Agree	Disagree	Strongly disagree	No opinion
Calculation methods					
Materiality					
Additionality					
Lifetimes					
Price demand elasticities[6] for taxation measures in real terms					
Indicative list of eligible energy saving measures					
Monitoring and verification procedures					
Reporting					
Other					

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

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

[6] Price demand elasticity is a measure used in economics to show the responsiveness, or elasticity, of the quantity demanded of a good or service.

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?

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?

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