

Public consultation on the energy efficiency framework for the decade ahead

Eurelectric consultation response paper

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Fields marked with * are mandatory.

Introduction

As announced in the [2026 Commission Work Programme](#), the European Commission plans to keep Europe on track to meet its climate goals and put forward an enabling framework for the decade ahead securing Europe's competitiveness and sustainability, including the setting-up of the energy efficiency framework and the phase-out of fossil fuels subsidies. This initiative aims to help prepare an enabling and future-proof energy and climate policy framework to support the EU's efforts to achieve its objectives of decarbonisation, affordability, security and competitiveness.

The initiative will contribute to reaching the proposed target of reducing net greenhouse gas emissions by 90% in 2040 compared to 1990, as set out in the provisionally agreed amendment to the European Climate Law. Energy efficiency is expected to play a central role in cost-effectively reaching this target, while strengthening EU competitiveness, improving energy security and ensuring affordability for citizens and businesses. The energy efficiency framework for the decade ahead will be developed in conjunction with other ongoing and planned initiatives across EU climate and energy law, including the review of the Governance Regulation, the post-2030 national climate targets and flexibilities, the renewable energy framework, the EU Emissions Trading System (EU ETS), the social dimension of the Energy Union and other relevant energy policy initiatives and enabling instruments.

The Energy Efficiency Directive sets out a comprehensive framework for promoting energy efficiency across the EU, including binding EU-level objectives, national contributions, sectoral measures, public sector leadership and planning, monitoring and reporting rules. It supports strategic medium- and long-term energy planning through its links to integrated national energy and climate plans (NECPs) set out in the Governance Regulation, and contributes to the achievement of the EU's 2030 energy and climate objectives and long-term goals. It also provides the basis for the Commission to monitor progress at EU and Member State level and to take corrective action if ambition or implementation is insufficient.

Given evolving policy needs and the transition towards the post-2030 period, the Commission will assess how the energy efficiency framework has functioned to date and identify areas where it could be further streamlined, strengthened or adapted for the decade ahead. This assessment will consider the increasing importance of energy efficiency in the design and operation of a decarbonised, cleaner, more electrified and

integrated energy system, the need to support industrial competitiveness and innovation, and the importance of ensuring social fairness and a just transition while ending the EU's fossil fuel import dependency and reducing subsidies for fossil fuels, administrative burden and costs.

Building on this assessment and on the Commission's political priorities for 2024-2029, the Commission will examine options for the future development of the EU energy efficiency framework, with a view to ensuring an effective, flexible and forward-looking framework for the decade ahead.

In this context, the Commission is launching a public consultation to gather views from all interested parties. The consultation is based on a questionnaire consisting of two parts:

- Part 1 collects background information about you.
- Part 2 focuses on key aspects of the energy efficiency framework for the decade ahead, notably:
 - the effectiveness and coherence of the current energy efficiency policy framework;
 - the role of energy efficiency in the new climate and energy framework (political and strategic direction, sector-specific provisions and financing framework and enabling tools);
 - the streamlining of the regulatory framework and the reduction of the administrative burden (enhancing coordination across sectors and policies).

You can save your responses as a draft and finish them later. Apart from some mandatory questions, you can answer questions on the sections which are relevant to you. When answering questions with a free text box for additional comments please be concise. At the end of the questionnaire, you can also upload a document with further comments and views, as appropriate.

About you

* Language of my contribution

- ☐ Bulgarian
- ☐ Croatian
- ☐ Czech
- ☐ Danish
- ☐ Dutch
- ☒ English
- ☐ Estonian
- ☐ Finnish
- ☐ French
- ☐ German
- ☐ Greek
- ☐ Hungarian

- ☐ Irish
- ☐ Italian
- ☐ Latvian
- ☐ Lithuanian
- ☐ Maltese
- ☐ Polish
- ☐ Portuguese
- ☐ Romanian
- ☐ Slovak
- ☐ Slovenian
- ☐ Spanish
- ☐ Swedish

* I am giving my contribution as

- ☐ Academic/research institution
- ☒ Business association
- ☐ Company/business
- ☐ Consumer organisation
- ☐ EU citizen
- ☐ Environmental organisation
- ☐ Non-EU citizen
- ☐ Non-governmental organisation (NGO)
- ☐ Public authority
- ☐ Trade union
- ☐ Other

* First name

Gabrielle

* Surname

Clark

* Email (this won't be published)

gclark@eurelectric.org

* Country of origin

Please add your country of origin, or that of your organisation.

This list does not represent the official position of the European institutions with regard to the legal status or policy of the entities mentioned. It is a harmonisation of often divergent lists and practices.

- | | | | |
|---|--|--|--|
| ☐ Afghanistan | ☐ Djibouti | ☐ Libya | ☐ Saint Martin |
| ☐ Åland Islands | ☐ Dominica | ☐ Liechtenstein | ☐ Saint Pierre and Miquelon |
| ☐ Albania | ☐ Dominican Republic | ☐ Lithuania | ☐ Saint Vincent and the Grenadines |
| ☐ Algeria | ☐ Ecuador | ☐ Luxembourg | ☐ Samoa |
| ☐ American Samoa | ☐ Egypt | ☐ Macau | ☐ San Marino |
| ☐ Andorra | ☐ El Salvador | ☐ Madagascar | ☐ São Tomé and Príncipe |
| ☐ Angola | ☐ Equatorial Guinea | ☐ Malawi | ☐ Saudi Arabia |
| ☐ Anguilla | ☐ Eritrea | ☐ Malaysia | ☐ Senegal |
| ☐ Antarctica | ☐ Estonia | ☐ Maldives | ☐ Serbia |
| ☐ Antigua and Barbuda | ☐ Eswatini | ☐ Mali | ☐ Seychelles |
| ☐ Argentina | ☐ Ethiopia | ☐ Malta | ☐ Sierra Leone |
| ☐ Armenia | ☐ Falkland Islands | ☐ Marshall Islands | ☐ Singapore |
| ☐ Aruba | ☐ Faroe Islands | ☐ Martinique | ☐ Sint Maarten |
| ☐ Australia | ☐ Fiji | ☐ Mauritania | ☐ Slovakia |
| ☐ Austria | ☐ Finland | ☐ Mauritius | ☐ Slovenia |
| ☐ Azerbaijan | ☐ France | ☐ Mayotte | ☐ Solomon Islands |
| ☐ Bahamas | ☐ French Guiana | ☐ Mexico | ☐ Somalia |
| ☐ Bahrain | ☐ French Polynesia | ☐ Micronesia | ☐ South Africa |

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|--|---|---|--|
| ☐ Bangladesh | ☐ French Southern
and Antarctic
Lands | ☐ Moldova | ☐ South Georgia
and the South
Sandwich Islands |
| ☐ Barbados | ☐ Gabon | ☐ Monaco | ☐ South Korea |
| ☐ Belarus | ☐ Georgia | ☐ Mongolia | ☐ South Sudan |
| ☒ Belgium | ☐ Germany | ☐ Montenegro | ☐ Spain |
| ☐ Belize | ☐ Ghana | ☐ Montserrat | ☐ Sri Lanka |
| ☐ Benin | ☐ Gibraltar | ☐ Morocco | ☐ Sudan |
| ☐ Bermuda | ☐ Greece | ☐ Mozambique | ☐ Suriname |
| ☐ Bhutan | ☐ Greenland | ☐ Myanmar/Burma | ☐ Svalbard and
Jan Mayen |
| ☐ Bolivia | ☐ Grenada | ☐ Namibia | ☐ Sweden |
| ☐ Bonaire Saint
Eustatius and
Saba | ☐ Guadeloupe | ☐ Nauru | ☐ Switzerland |
| ☐ Bosnia and
Herzegovina | ☐ Guam | ☐ Nepal | ☐ Syria |
| ☐ Botswana | ☐ Guatemala | ☐ Netherlands | ☐ Taiwan |
| ☐ Bouvet Island | ☐ Guernsey | ☐ New Caledonia | ☐ Tajikistan |
| ☐ Brazil | ☐ Guinea | ☐ New Zealand | ☐ Tanzania |
| ☐ British Indian
Ocean Territory | ☐ Guinea-Bissau | ☐ Nicaragua | ☐ Thailand |
| ☐ British Virgin
Islands | ☐ Guyana | ☐ Niger | ☐ The Gambia |
| ☐ Brunei | ☐ Haiti | ☐ Nigeria | ☐ Timor-Leste |
| ☐ Bulgaria | ☐ Heard Island and
McDonald Islands | ☐ Niue | ☐ Togo |
| ☐ Burkina Faso | ☐ Honduras | ☐ Norfolk Island | ☐ Tokelau |
| ☐ Burundi | ☐ Hong Kong | ☐ Northern Mariana
Islands | ☐ Tonga |
| ☐ Cambodia | ☐ Hungary | ☐ North Korea | ☐ Trinidad and
Tobago |

- | | | | |
|---|-----------------------------------|---|--|
| ☐ Cameroon | ☐ Iceland | ☐ North Macedonia | ☐ Tunisia |
| ☐ Canada | ☐ India | ☐ Norway | ☐ Türkiye |
| ☐ Cape Verde | ☐ Indonesia | ☐ Oman | ☐ Turkmenistan |
| ☐ Cayman Islands | ☐ Iran | ☐ Pakistan | ☐ Turks and
Caicos Islands |
| ☐ Central African
Republic | ☐ Iraq | ☐ Palau | ☐ Tuvalu |
| ☐ Chad | ☐ Ireland | ☐ Palestine | ☐ Uganda |
| ☐ Chile | ☐ Isle of Man | ☐ Panama | ☐ Ukraine |
| ☐ China | ☐ Israel | ☐ Papua New
Guinea | ☐ United Arab
Emirates |
| ☐ Christmas Island | ☐ Italy | ☐ Paraguay | ☐ United Kingdom |
| ☐ Clipperton | ☐ Jamaica | ☐ Peru | ☐ United States |
| ☐ Cocos (Keeling)
Islands | ☐ Japan | ☐ Philippines | ☐ United States
Minor Outlying
Islands |
| ☐ Colombia | ☐ Jersey | ☐ Pitcairn Islands | ☐ Uruguay |
| ☐ Comoros | ☐ Jordan | ☐ Poland | ☐ US Virgin Islands |
| ☐ Congo | ☐ Kazakhstan | ☐ Portugal | ☐ Uzbekistan |
| ☐ Cook Islands | ☐ Kenya | ☐ Puerto Rico | ☐ Vanuatu |
| ☐ Costa Rica | ☐ Kiribati | ☐ Qatar | ☐ Vatican City |
| ☐ Côte d'Ivoire | ☐ Kosovo | ☐ Réunion | ☐ Venezuela |
| ☐ Croatia | ☐ Kuwait | ☐ Romania | ☐ Vietnam |
| ☐ Cuba | ☐ Kyrgyzstan | ☐ Russia | ☐ Wallis and
Futuna |
| ☐ Curaçao | ☐ Laos | ☐ Rwanda | ☐ Western Sahara |
| ☐ Cyprus | ☐ Latvia | ☐ Saint Barthélemy | ☐ Yemen |
| ☐ Czechia | ☐ Lebanon | ☐ Saint Helena
Ascension and
Tristan da Cunha | ☐ Zambia |

- ☐ Democratic Republic of the Congo
- ☐ Lesotho
- ☐ Saint Kitts and Nevis
- ☐ Zimbabwe
- ☐ Denmark
- ☐ Liberia
- ☐ Saint Lucia

Role/position (if applicable)

*** Organisation name**

255 character(s) maximum

*** Are the organisation's main headquarters within the EU?**

- ☒ Yes
- ☐ No

*** Organisation size**

- ☐ Micro (1 to 9 employees)
- ☐ Small (10 to 49 employees)
- ☒ Medium (50 to 249 employees)
- ☐ Large (250 or more)

In which sector(s) do you or your members operate? Please select all that apply.

- ☐ Public sector/government - national level
- ☐ Public sector/government - regional level
- ☐ Public sector/government - local level
- ☐ Research and education
- ☐ Social economy
- ☐ Construction/buildings

Energy sector

- ☐ Transmission system operator (TSO)
- ☒ Distribution system operator (DSO)

- ☐ Regulator
- ☒ Energy supplier, retailer or aggregator
- ☐ Power exchange/market operator
- ☐ Energy trader
- ☒ Energy producer
- ☐ Energy project developer
- ☒ Energy service company (ESCO) and other energy service providers
- ☐ Energy technical, legal or financial advisory
- ☒ Energy storage operators and other market participants providing storage services
- ☒ District heating or cooling provider
- ☐ Data centre or Information and Communication Technology processing company
- ☐ Manufacturer of clean technologies

Financial and insurance sector

- ☐ International financial institutions (IFIs) and National promotional banks and institutions (NPBIs)
- ☐ Credit institutions
- ☐ Investment funds
- ☐ Investment services

Energy-intensive industry

- ☐ Steel
- ☐ Non-ferrous metals
- ☐ Cement
- ☐ Chemicals and chemical-based fertilisers
- ☐ Glass and ceramics
- ☐ Paper
- ☐ Production of hydrogen or gases including low carbon, biomethane, biogases
- ☐ Other

Transport

- ☐ Aviation

- ☐ Maritime
- ☐ Road transport
- ☐ Rail
- ☐ Other

Waste management, including incineration

- ☐ Technology provider or waste management manufacturer
- ☐ Company of mission of public service

Land use/bioeconomy

- ☐ Agriculture value chain
- ☐ Forestry value chain
- ☐ Other

Please provide a short description of your activities in the abovementioned sectors.

500 character(s) maximum

Eurelectric is the industry association for Europe's electricity sector, representing over 3,500 companies covering DSOs, wholesale/retail markets, and electricity generation.

Transparency register number

Check if your organisation is on the transparency register. It's a voluntary database for organisations seeking to influence EU decision-making.

* How many years of experience do you have with the Energy Efficiency Directive?

- ☐ Less than 1 year
- ☐ 1-5 years
- ☒ More than 5 years

The Commission will publish all contributions to this public consultation. You can choose whether you would prefer to have your details published or to remain anonymous when your contribution is published. **For the purpose of transparency, the type of respondent (for example, 'business association', 'consumer association', 'EU citizen') country of origin, organisation name and size, and its transparency register number, are always published. Your e-mail address will never be published.** Opt in to select the privacy option that best suits you. Privacy options default based on the type of respondent selected

* **Contribution publication privacy settings**

The Commission will publish the responses to this public consultation. You can choose whether you would like your details to be made public or to remain anonymous.

☒ **Anonymous**

Only organisation details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and your contribution will be published as received. Your name will not be published. Please do not include any personal data in the contribution itself if you want to remain anonymous.

☐ **Public**

Organisation details and respondent details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and your contribution will be published. Your name will also be published.

☒ I agree with the [personal data protection provisions](#)

Energy efficiency framework for the decade ahead

1. Effectiveness and coherence of the current energy efficiency policy framework

The current energy efficiency policy framework could do more to support a broader set of strategic objectives for the decade ahead. This includes accelerating the transition towards climate neutrality, strengthening EU competitiveness, enhancing energy security and system resilience, supporting strategic autonomy, and addressing challenges along the value chains for clean and net-zero technologies.

Energy efficiency policies should ensure energy efficiency in the design and operation of the future decarbonised energy system to integrate high shares of renewable energy, eliminate energy waste, increase excess and waste heat reuse, and minimise the cost of the transition. Energy efficiency policies could also further contribute to the phasing out of fossil fuels and inefficient fossil fuel subsidies, and to more systematic integration of skills, workforce development and job creation aspects. Energy efficiency also plays a central role in increasing climate resilience and supporting adaptation to climate impacts in a more integrated energy system.

Finally, there is scope for enhancing coherence and synergies between the energy efficiency framework and other policy areas, including environmental (notably air quality) and climate policies, transport, industry, buildings and urban development, agriculture, macro-economic and industrial policy, and the social dimension of the Energy Union to maximise overall effectiveness and cost-efficiency.

1. To what extent do you agree with the following statement?

"The main objectives of the Energy Efficiency Directive (EED), notably to implement energy efficiency as a priority across all sectors, remove barriers in the energy market and overcome market failures that impede energy efficiency, are still relevant for the post-2030 framework."

	Strongly disagree	Disagree	Neither agree nor disagree	Agree	Strongly agree	No opinion
* Please select your answer:	☐	☐	☐	☒	☐	☐

Please explain your answer.

The revision of the entire post-2030 framework is marked by the need to:

- (ii) Progress towards decarbonization goals; and
 - (ii) Make the EU's economy more competitive & resilient, especially considering how recent geopolitical tensions have once again highlighted the EU's vulnerability stemming from its reliance on imported fossil fuels.
- In this context, accelerating the deployment of clean domestic energies, their integration in the energy system and the electrification of end uses is not only a climate imperative, but also a strategic response to competitiveness & resilience challenges, offering a scalable pathway to strengthen energy security, stabilize energy costs and reduce exposure to geopolitical risks.

In addition, while the objectives of the EED remain valid, their future implementation requires a more flexible, system-oriented and pragmatic approach, particularly for district heating.

2. To what extent has the EED achieved its objectives so far?

	Not at all	To a little extent	To some extent	To a moderate extent	To a large extent	No opinion
* Please select your answer:	☐	☐	☒	☐	☐	☐

Please explain your answer.

The EED has contributed to addressing certain market failures and promoting energy efficiency measures across sectors. However, its objectives have only been achieved to a moderate extent. In particular, the strong focus on energy savings as a standalone metric has not consistently delivered energy efficiency through electrification of the energy demand. As a result, some highly efficient, especially those based on clean domestic electricity, are not adequately incentivized.

When it comes to district heating, the Directive also does not sufficiently address the efficiency of networks themselves, such as reducing heat losses, modernising infrastructure, or lowering operating temperatures. This is a significant gap, especially in countries with extensive and ageing networks, where distribution losses can reach 15–20% of supplied heat.

A revised post-2030 framework should therefore better align energy efficiency policy with the goals of decarbonization, fossil fuel import reduction, security of supply and competitiveness. In order to achieve this, the revised EED should more accurately reflect the contribution of low-carbon electricity to the EU's decarbonisation objectives.

3. Which elements have contributed most to the effectiveness of the EU energy efficiency policy framework? *(Please assign a numerical weight from 1 to 5 to each option below, with 1 being a very low contribution and 5 a very high contribution.)*

	1	2	3	4	5	No opinion
* The "energy efficiency first" principle	☐	☐	☒	☐	☐	☐
* EU-level targets and/or national contributions	☐	☐	☒	☐	☐	☐
* National planning and reporting requirements	☐	☐	☐	☒	☐	☐
* The energy savings obligation	☐	☐	☐	☒	☐	☐
* The public sector's exemplary role	☐	☐	☐	☒	☐	☐
* Energy audits and energy management systems	☐	☐	☒	☐	☐	☐
* Consumer information and metering	☐	☐	☒	☐	☐	☐
* Energy efficiency in heating and cooling	☐	☐	☒	☐	☐	☐
* Local heating and cooling plans	☐	☐	☒	☐	☐	☐
* Financing and technical assistance	☐	☐	☐	☒	☐	☐
Other	☐	☐	☐	☐	☐	☐

4. Which factors have limited the effectiveness of the current framework? *(Please assign a numerical weight from 1 to 5 to each option below, with 1 being a very low contribution and 5 a very high contribution.)*

	1	2	3	4	5	No opinion
* Insufficient ambition	☒	☐	☐	☐	☐	☐
* Limited harmonisation and cross-border interoperability across the national energy efficiency frameworks	☐	☐	☒	☐	☐	☐

* Complexity of provisions and administrative burden	☐	☐	☐	☐	☒	☐
* Uneven implementation across Member States	☐	☐	☐	☒	☐	☐
* Insufficient enforcement	☐	☒	☐	☐	☐	☐
* Limited access to finance	☐	☐	☐	☐	☒	☐
* Limited business case	☐	☐	☐	☒	☐	☐
* Skills shortages	☐	☐	☒	☐	☐	☐
Other	☐	☐	☐	☐	☒	☐

* If you selected "Other", please specify:

- PEF for electricity needs to take a forward looking approach.
- Align EEFP with electrification and system optimisation in concrete and effective way.

5. To what extent has the EED stimulated energy efficiency efforts in the following sectors?

	Not at all	To a little extent	To some extent	To a moderate extent	To a large extent	No opinion
* Buildings	☐	☐	☐	☒	☐	☐
* Heating and cooling	☐	☐	☒	☐	☐	☐
* Industry	☐	☐	☒	☐	☐	☐
* Information and communication technologies (ICT)	☐	☒	☐	☐	☐	☐
* Transport	☐	☒	☐	☐	☐	☐
* Commercial services	☐	☐	☒	☐	☐	☐
* Public services	☐	☐	☒	☐	☐	☐

6. To what extent have energy management systems and energy audits proven to be effective ways of optimising businesses' energy performance and contributing to costs savings?

	Not at all	To a little extent	To some extent	To a moderate extent	To a large extent	No opinion
* Please select your answer:	☐	☒	☐	☐	☐	☐

Please explain your answer.

The effectiveness of energy management systems and energy audits remains difficult to fully assess at this stage.

Energy audit frameworks in many cases/Member States are limited just to a compliance process while implementation of energy saving measures remains voluntary thus restricting efficiency potential.

In addition, in many Member States, these provisions have not yet been fully implemented, leading to delays and an uneven level of deployment across the EU.

7. Which national policies and measures implemented to fulfil the energy savings obligation (Articles 8-10 of the EED) have proven to be the most effective under the current framework? *(Please assign a numerical weight from 1 to 5 to each option below, with 1 being not effective at all and 5 very effective.)*

	1	2	3	4	5	No opinion
* Energy efficiency obligation schemes (EEOS)	☐	☐	☒	☐	☐	☐
* White certificates schemes	☐	☐	☐	☒	☐	☐
* Energy efficiency financing programmes, including financial instruments and subsidies	☐	☐	☐	☒	☐	☐
* Information and behavioural campaigns	☐	☐	☐	☒	☐	☐
* Industrial programmes	☐	☐	☒	☐	☐	☐
* Public sector interventions	☐	☒	☐	☐	☐	☐
* Taxation, including carbon taxes	☐	☐	☐	☐	☒	☐
Other	☐	☐	☐	☐	☒	☐

* If you selected "Other", please specify:

National Energy Efficiency Funds (in combination with EEOS) and alternative policy measures.

8. Which factors have influenced the effectiveness of the application of Annex V of the EED for the implementation of the energy savings obligation?

Between 1 and 3 selections

- ☐ Complexity of provisions
- ☒ Different methods for calculating energy savings
- ☒ Uneven implementation across Member States

- ☐ Limited exceptions to the principle of additionality
- ☐ Insufficient guidance
- ☒ The exclusion of savings from measures concerning the direct combustion of fossil fuels
- ☐ Low interest on energy savings monetisation due to high transaction costs linked to complexity
- ☐ Other

9. Which provisions of the EED were the most effective for increasing energy efficiency in heating and cooling?

Between 1 and 3 selections

- ☐ Provisions on local heating and cooling planning
- ☒ Provisions on the development of high-efficiency cogeneration
- ☒ Provisions on energy efficiency in district heating and cooling
- ☐ Provisions on waste heat recovery
- ☐ Provisions on metering and billing information
- ☒ Other

* If you selected "Other", please specify:

Exclusion of savings from measures concerning the direct combustion of fossil fuels

2. Effectiveness and coherence of the current energy efficiency policy framework

a. Political and strategic direction

In the context of the revision of the Governance Regulation, the Commission has [asked for evidence](#) in the period between 18 December 2025 and 12 March 2026 on the preferred target architecture for the post-2030 framework, including as far as energy efficiency is concerned. It is asking stakeholders to respond to questions on this topic in the context of that consultation as long as it remains open.

If you have not participated in the consultation on the Governance Regulation by the 12 March 2026 deadline, the following question on the revision of the Governance Regulation is replicated here.

1. The EU currently has a 2030 energy efficiency target with indicative national contributions. How do you think energy efficiency should be expressed and what should the design be to support the necessary uptake of energy efficiency to achieve the EU's 2040 climate objectives? (*Please rank the following options or accept the initial order.*)

Use drag&drop or the up/down buttons to change the order or accept the initial order.

 Another option or a combination of options

 Option 1: Continue with the current structure of a binding EU energy efficiency target, supported by national contributions determined by formulas.

 Option 2: Keep a similar structure with a binding EU energy efficiency target as in option 1, while allowing for flexibilities that reflect Member States' specificities.

 Option 3: Set a single, overarching clean energy target for the EU with embedded minimum thresholds for key energy parameters, including energy efficiency.

 Option 4: Set a single, overarching electrification target for the EU with embedded minimum thresholds for key parameters (such as renewable energy and energy efficiency).

 Option 1, 2, 3 or 4 complemented by/combined with monitoring KPIs for key energy system components (such as electrification, waste heat reduction or re-use), while ensuring transparency and comparability.

If stakeholders have something to add or specify regarding the post-2030 target architecture, would they please do so here:

Eurelectric's views on the enabling conditions and architecture of the post-2030 energy framework can be found in the following position paper: <https://www.eurelectric.org/wp-content/uploads/2026/03/2026-05-26-Eurelectric-Position-Paper-on-Post-2030-Framework-Final-updated.pdf>

If you selected "Another option or a combination of options", please specify:

1000 character(s) maximum

Eurelectric's views on the enabling conditions and architecture of the post-2030 energy framework can be found in the following position paper: <https://www.eurelectric.org/wp-content/uploads/2026/03/2026-05-26-Eurelectric-Position-Paper-on-Post-2030-Framework-Final-updated.pdf>

* 2. How should energy efficiency progress be benchmarked/monitored after 2030?

- ☐ In terms of energy consumption
- ☒ In terms of energy intensity
- ☐ Other
- ☐

No opinion

Please explain your answer.

In order to more accurately take into account European industrial decline and/or growth.

3. Which mechanisms would best ensure the achievement of post-2030 energy efficiency objectives?

Between 1 and 3 selections

- ☐ Better monitoring and reporting
- ☐ Corrective or enforcement mechanisms
- ☒ A better financing framework for energy efficiency
- ☐ Better technical assistance
- ☐ Better application of the "energy efficiency first" principle
- ☐ Other

4. Should the future EU energy efficiency policy ensure efficiency of the whole energy system, by focusing equally on energy efficiency potential on both the supply and the demand side?

- ☐ It should
- ☒ It should not
- ☐ No opinion

Please explain your answer.

5. What type of policy measures will be effective at ensuring energy efficiency in the design and operation of the future decarbonised energy system? *(Please assign a numerical weight from 1 to 5 to each option below, with 1 being not effective at all and 5 very effective.)*

	1	2	3	4	5	No opinion
* Better application of the "energy efficiency first" principle in national energy system planning	☐	☐	☒	☐	☐	☐
* Calculating whole-system costs to prioritise energy efficiency options on the supply and demand side	☒	☐	☐	☐	☐	☐

* Encouraging the use of AI in the design and operation of the energy system	☐	☐	☒	☐	☐	☐
* Decentralising energy system planning and empowering the local level in efficient system design and system integration	☐	☐	☐	☒	☐	☐
* KPI or target, for example for waste heat reduction	☐	☐	☒	☐	☐	☐
A combination of the above measures	☐	☐	☐	☐	☒	☐
Other	☐	☐	☐	☐	☐	☐

If you selected "A combination of the above measures" or "Other", please specify here:

6. Regarding a potential energy savings obligation, which instruments should be favoured to achieve end-use savings nationally and in end-use sectors?

- ☐ Energy efficiency obligation schemes (EEOS)
- ☐ White certificates schemes
- ☐ Energy efficiency auctions
- ☐ National energy efficiency funds and dedicated energy efficiency financing programmes, including financial instruments
- ☐ Taxation and fiscal incentives
- ☒ Other

* If you selected "Other", please specify:

A combination of options 2, 3, 4, 5

b. Sector-specific provisions

* 1. In which sectors or areas would additional energy efficiency efforts be most needed?

Between 1 and 3 selections

- ☐ Buildings
- ☒ Heating and cooling
- ☐ Industry
- ☐ Information and communication technologies (ICT), including data centres
- ☐ Energy system

- ☒ Transport
- ☐ Commercial services
- ☐ The public sector
- ☐ Financing
- ☐ Other

2. Which provisions of the EED on the public sector will be the most relevant for the future and should be continued/strengthened?

Between 1 and 3 selections

- ☐ Energy management systems and energy audits for public bodies
- ☒ Energy consumption reduction targets for the public sector
- ☒ Member States' assistance to regional and local authorities
- ☒ The obligation to renovate 3% of public buildings every year
- ☐ Energy savings in public buildings
- ☐ Obligatory energy efficiency criteria in public procurement

*3. Should the implementation of energy management systems and energy audits in businesses be continued/strengthened?

- ☐ It should
- ☐ It should not
- ☒ No opinion

6. Which provisions of the EED related to heating and cooling will be the most relevant for the future and for phasing out fossil fuels and should be continued /strengthened?

Between 1 and 3 selections

- ☐ Local heating and cooling plans linked to national energy and climate plans (NECPs) and national air pollution control programmes (NAPCPs), as well as air quality plans
- ☒ Provisions on efficient district heating and cooling
- ☒ Provisions on clean technologies for heating and cooling, including heat pumps, geothermal systems and solar thermal technology
- ☐ Provisions on high-efficiency cogeneration
- ☐

Provisions on waste heat recovery from the power sector, industry, services and data centres

- ☐ Provisions on metering and billing information
- ☒ Other (or new) provisions

* If you selected "Other (or new) provisions", please specify:

- Exclusion of savings from measures concerning the direct combustion of fossil fuel.
- Revision of PEF for electricity in order to ensure that it is below fossil fuel PE.
- Member States should include clear plans to phase out fossil fuels in their national plans.

* 7. Should waste/excess/production heat recovery become mandatory when cost-effective re-use options have been identified through a cost benefit analysis or energy audits?

- ☐ It should
- ☒ It should not
- ☐ No opinion

Please explain your answer.

8. Should heating networks (e.g., district heating) be prioritised in urban areas to unlock efficiency and prevent a lack of capacity in the local electricity grid or the soaring cost of electricity distribution?

- ☐ Yes, by requiring a minimum share of heating networks in the total heating and cooling supply
- ☐ Yes, by empowering local authorities to decide on the urban areas to be supplied by heating networks
- ☐ Yes, by requesting lower national taxation on heat delivered from heating networks (minimum or zero taxation rates for VAT and excise)
- ☐ Yes, through an investment-enabling financing and funding framework for the development of heating networks
- ☐ Yes, through an investment-enabling financing and funding framework for clean technologies for heating and cooling, designed to decarbonise buildings and industry

- ☒ Other prioritisation measures
- ☐ No prioritisation needed

* If you selected "Other prioritisation measures", please specify:

A combination of options 2,3,4,5

9. How should data centre regulation evolve post-2030? (*Please assign a numerical weight from 1 to 5 to each option below, with 1 being a strong disagreement for the option and 5 a strong agreement.*)

	1	2	3	4	5	No opinion
* No regulation is needed	☒	☐	☐	☐	☐	☐
* Maintain the current framework of Article 12 of the EED (the public disclosure of data, a reporting scheme, and a rating scheme)	☐	☐	☐	☒	☐	☐
* Make the current framework of Article 12 and Annex VII to the EED more uniform across the EU	☐	☐	☐	☐	☐	☒
* Add EU-wide minimum performance standards for data centres to the framework	☒	☐	☐	☐	☐	☐
* Add sustainability conditions to permitting or state financing	☐	☒	☐	☐	☐	☐
* Add measures to support the integration of data centres into the energy system	☐	☒	☐	☐	☐	☐
Other	☐	☐	☒	☐	☐	☐

* If you selected "Other", please specify:

Climate normalization for sustainability indicators to ensure a level playing field that would not ban warmer regions.

c. Financing framework and enabling tools

* 1. What type of financing framework do you consider the most relevant for the achievement of the energy efficiency objectives?

- ☐ A prescriptive financing framework, specifically linking financial incentives to binding energy efficiency improvements in line with regulatory requirements
- ☒

An enabling financing framework, where public financing helps market actors to leverage the energy efficiency business case, and private and public stakeholders to access finance for their energy efficiency projects

- ☐ A monitoring framework focused on performance tracking through reporting and the benchmarking of energy efficiency, with limited public intervention
- ☐ None of the above frameworks is considered sufficiently effective at achieving energy efficiency objectives
- ☐ No opinion

2. What are the most important financing support and enabling tools to facilitate energy efficiency investments and uptake?

- ☒ Energy efficiency grants and subsidies
- ☒ Energy efficiency preferential loans and bankability support, by means of public financing programmes (such as public guarantee as collateral, a tax discount on the interest rate, etc.)
- ☒ Blended financing combining grants, financial instruments and technical assistance
- ☐ Tradable energy efficiency certificates (White certificates)
- ☐ Advisory services and project development assistance facilities
- ☐ Public-private partnerships such as concessions and other equity co-investment structures
- ☒ Fiscal incentives and penalties through taxation
- ☒ Financing through service agreements/ operational expenditures (energy efficiency as a service and other innovative energy services, leasing, etc.)
- ☐ Financing by means of credit agreements, such as energy efficiency lending products (secured and unsecured)
- ☐ Energy service company-based and third-party financing (off balance sheet)
- ☐ Green securitisation and asset-backed securities to boost lending activities and capital markets
- ☒ Other

* If you selected "Other", please specify:

National energy efficiency fund combined with certificates and alternatives measures.

3. How relevant do you consider the following improvements to the EU framework for energy efficiency financing and energy services? *(Please assign a numerical weight from 1 to 5 to each option below, with 1 being the least relevant and 5 the most relevant.)*

	1	2	3	4	5	No opinion
* Harmonising and simplifying the energy efficiency financing framework by ensuring the strict alignment of eligibility rules for energy efficiency investments and energy services across the relevant regulatory framework (energy efficiency legislation, financial services regulation, EU Taxonomy, the State aid framework, EU funding programmes, EU budget rules and Do No Significant Harm, and other relevant frameworks)	☐	☐	☐	☒	☐	☐
* Providing a coherent set of EU-level definitions and standard templates for energy efficiency loans, energy services (companies and providers), energy performance contracting, and other relevant innovative financing and emerging energy service-based models	☐	☐	☐	☒	☐	☐
* Giving market participants clearer guidance and information, while improving programme design and implementation, notably in terms of responsiveness, relevance and operational efficiency	☐	☐	☐	☒	☐	☐
* Clarifying EU accounting rules and financial treatment of energy services contracts and service-based financing	☐	☐	☒	☐	☐	☐
* Establishing a common template for an energy efficiency certificate (EEC) to increase investors' confidence in the monetary value of energy savings and provide a minimum basis for cross-border interoperability	☐	☒	☐	☐	☐	☐
* Simplifying energy savings monitoring and verification measures to enable cross-border interoperability, reduce transaction costs and favour energy efficiency investments and market scaling	☐	☒	☐	☐	☐	☐
* Establishing national energy service companies' databases and ensuring their cross-border interoperability and mutual recognition	☐	☒	☐	☐	☐	☐
* Supporting the establishment of (national) performance guarantees and refinancing opportunities for energy service companies and energy performance contracting	☐	☒	☐	☐	☐	☐

* Mandating the provision of project development assistance and advisory support to facilitate the uptake of energy efficiency investments	☐	☒	☐	☐	☐	☐
* Supporting the use of financial instruments and public guarantees as a default way of establishing national support frameworks for energy efficiency	☐	☐	☒	☐	☐	☐
* Encouraging and supporting closer cooperation with financial institutions and market actors, for example through the Energy Efficiency Financing Coalition, and helping Member States to develop national collaboration platforms, such as national hubs	☐	☐	☐	☒	☐	☐
* Developing national or local level collaboration among actors in specific sectors, assets or technologies in order for them to reach agreement on shared goals (model partnership agreements, e.g. on waste heat recovery)	☐	☐	☐	☒	☐	☐

3. Streamlining the energy efficiency policy framework and reducing administrative burden

* 1. Should the energy efficiency framework be streamlined or implementation made more flexible while preserving its objectives for the decade ahead?

- ☒ It should
- ☐ It should not
- ☐ No opinion

* If you think so, which measures or provisions should be streamlined (e.g., the "energy efficiency first" principle, the energy savings obligation, energy management systems and energy audits, energy-efficient district heating and cooling requirements etc.)?

No specific elaboration on this here.

* 2. In your view, which provisions of the EED could be incorporated into other regulations/directives (e.g., public procurement, energy performance of buildings, financing regulations, legislation regulating metering and billing and consumer-related provisions etc.) and in which ways?

If additional obligations are incorporated into the EED, sufficient flexibility should be preserved to ensure proportionate and cost-effective implementation across Member States, taking into account national specificities. Accordingly, these provisions should remain strictly optional.

Corporate Sustainability & Industry (e.g. CSRD, Article 11 of the EED): Article 11 requires energy intensive enterprises to implement Energy Management Systems (EnMS) or to carry out energy audits. Incorporating Article 11 - while ensuring that it refers exclusively to end-uses - to corporate energy auditing directly under the Corporate Sustainability Reporting Directive (CSRD) would avoid overlapping administrative burdens, streamlining both energy auditing and ESG data disclosure under a single European Sustainability Reporting Standards (ESRS) framework.

Metering, Billing and Consumer Protection: Articles 18–24 of the EED set out rules on the allocation of heating /cooling costs, metering & billing requirements and the protection of vulnerable customers. These articles and their requirements can be integrated into the Electricity Directive (EU) 2019/944 and the Gas Directive 2024 /1788. Universal consumer rights, such as clear billing information and prevention of energy supply interruptions, should be governed by a single Energy Consumer Law (e.g. Citizens Energy Package).

Financial Mechanisms: Article 30 mandates the establishment of National Energy Efficiency Funds and requires Member States to establish financial support mechanisms that prioritise vulnerable customers and energy efficiency improvements. Article 30 can be directly incorporated into the regulations governing the Social Climate Fund (SCF) and the EU Structural Funds.

***3. In your view, are there provisions in the EED, for which the administrative costs of implementing exceed the benefits?**

According to Article 11, companies with a total energy consumption exceeding 85TJ (23.6 GWh) are required to implement a certified Energy Management System (EMS).

While an EMS provides continuous improvement, if not applied exclusively to end-uses with clear energy-saving potential, it might be applied to inelastic consumption, such as the self-consumption of power generation plants. Furthermore, for companies in energy markets with limited profit margins or high volatility, the recurring costs of external audits, documentation, and compliance may outweigh the financial benefits of the actual energy savings.

According to Article 8, Member states must achieve cumulative end-use energy savings, with an annual rate scaling up to 1.9% of final energy consumption by 2030. To demonstrate compliance, some governments (eg in Greece) require highly complex monitoring, verification, and measurement systems from businesses and energy suppliers. The administrative cost to accurately verify these savings can be highly inefficient, especially when targeting hard-to-reach groups like energy-poor households. Furthermore, in Greece, the criteria for assigning savings targets to businesses and energy suppliers are arbitrary, considering the market share of the companies rather than the actual savings' potential. This makes achieving the targets unrealistic without the development of financial tools to support energy efficiency projects (such as grants, subsidies, and tax credits) or mechanisms like energy efficiency auctions. This is particularly challenging when verification criteria (e.g., additionality) subtract savings from the finite potential by considering them part of the baseline.

In addition, energy efficiency obligation schemes and certificate-based mechanisms have proven, in practice, to be associated with a high administrative burden. These include complex procedures for ex-ante and ex-post audits, extensive documentation requirements, lengthy verification processes and regulatory uncertainty. As a result, the transaction costs can be comparable to, or even exceed, the economic value of the achieved energy savings.

Moreover, these schemes often prioritise smaller, individual projects rather than strategic, system-wide investments (e.g. district heating network modernisation, loss reduction or digitalisation), limiting their overall effectiveness from a system perspective.

Similarly, some reporting and compliance obligations related to energy management and monitoring may generate additional costs without delivering proportional, measurable improvements in energy efficiency.

Overall, while the objectives of these provisions remain valid, their current design should be simplified and better aligned with system-level outcomes to ensure that administrative efforts translate into tangible and cost-effective energy savings.

*** 4. Are there any parts or provisions in the EED that are obsolete or have proven to be unsuitable for the achievement of its objectives?**

1) Energy efficiency first principle

The future energy efficiency framework should encourage the electrification of end uses, as one of the most effective ways to combine higher energy efficiency with deep GHG emission reductions. Alongside energy efficiency, the objective of reducing GHG emissions should be at the core of the new framework, through the consumption of decarbonised energies, as energy savings alone do not systematically result in a significant reduction in GHG emissions. Indeed, the energy efficiency first principle (EEFP) does not necessarily steer investments towards the most cost-effective solutions for decarbonising the energy system as a whole, notably the electrification of end-uses, if all the costs necessary for the proper functioning of the energy system in question (network reinforcement investments, flexibility, security of supply, consideration of sustainability and circular economy principles and operational security of the entire system) are not taken into account.

2) Energy metrics

In the current Energy Efficiency Directive, the predominant use of primary energy as a key metric can create structural disadvantages for electricity compared to fossil fuels and may therefore hinder electrification. While primary energy indicators aim to reflect upstream energy impacts, they rely on convention-based conversion factors that can evolve over time and differ depending on policy choices. By contrast, final energy consumption is directly measured through meters and is more closely aligned with consumer behaviour and energy bills, which are the primary concern for end-users. This could be considered instead.

3) Article 8, considering that MS implementation may lead to underutilization of EEOS potential

We would support a common EU-wide implementation framework based on best practices and lessons learned while complemented with measures offering more flexibility options and aiming to additional support through financing tools.

*** 5. In the post-2030 framework, are there energy efficiency reporting obligations that could be removed, simplified, streamlined or merged with other reporting obligations in the broader energy policy architecture?**

Some provisions have proven unsuitable in their current form, particularly those leading to additional cost-driven obligations for energy utilities.

In practice, certain requirements imposed on energy companies, including regulated operators, generate additional investment and operational costs that do not necessarily translate into tangible energy efficiency gains at system level. These costs are typically passed through to final energy prices, increasing the financial burden on consumers.

This approach may produce unintended effects, as higher energy prices can reduce the capacity of households and businesses to invest in their own energy efficiency improvements, thereby weakening demand-side action. As a result, provisions that place disproportionate obligations on energy utilities, without clear and measurable system-wide benefits, can be considered unsuitable in their current design. A more effective approach would

focus on incentivising efficiency improvements where real impact can be achieved, particularly at the level of end-users and through system-oriented investments.

Specifically, the following should be considered:

Article 3 - Cost-benefit analysis only for end-use energy projects, excluding energy production infrastructure projects.

Article 11 - EMS or energy audit obligations only for end-use energy facilities, excluding the energy sector and energy production infrastructure, with application per VAT number.

Article 8 - Implementation of Energy Efficiency Obligation Schemes (EEOS) through alternative national measures or the development of incentives and financial tools to support energy efficiency projects (e.g., grants, subsidies, tax credits/deductions) for Obligated Parties (especially Suppliers/ DSOs), and/or by using energy efficiency auction mechanisms.

Article 26, para 7 - Non-mandatory implementation of the results of cost-benefit studies for evaluating the economic viability of operating thermal power generation plants over 10 MWth as high-efficiency cogeneration plants. Derogation from the obligation to conduct a CBA for thermal power generation plants over 10 MWth operating in "small connected systems" or "small isolated systems".

Final questions

Do you have any additional comments on points not addressed in the previous questions?

1000 character(s) maximum

The PEF for electricity should provide a clear signal to consumers to shift away from fossil fuels. It should adopt a forward looking approach, reflecting the future electricity mix rather than historical values. The electricity PEF should be set lower than the PEF of fossil fuels, to reflect its lower emissions & its role in a decarbonised energy system. This would support electrification in heating & industry, investment in clean technologies & the reduction of fossil fuel imports.

Align the EEFP with electrification & system optimization. The EEFP should be understood as an overarching principle to achieve the EU's climate targets, rather than an ultimate goal to just reduce energy consumption. This can be done by applying the principle in conjunction with other policy objectives like security of supply, and making sure it considers the efficiency of the entire integrated energy system to promote the most efficient and low-carbon solution across the value chain.

Alternatively, you may submit evidence or position papers on topics falling under the scope of this review.

Only files of the type pdf,txt,doc,docx,odt,rtf are allowed

Contact

ENER-ENERGY-EFFICIENCY@ec.europa.eu

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The vision of the European power sector is to enable and sustain:

- A vibrant competitive European economy, reliably powered by clean, carbon-neutral energy
- A smart, energy efficient and truly sustainable society for all citizens of Europe

We are committed to lead a cost-effective energy transition by:

investing in clean power generation and transition-enabling solutions, to reduce emissions and actively pursue efforts to become carbon-neutral well before mid-century, taking into account different starting points and commercial availability of key transition technologies;

transforming the energy system to make it more responsive, resilient and efficient. This includes increased use of renewable energy, digitalisation, demand side response and reinforcement of grids so they can function as platforms and enablers for customers, cities and communities;

accelerating the energy transition in other economic sectors by offering competitive electricity as a transformation tool for transport, heating and industry;

embedding sustainability in all parts of our value chain and take measures to support the transformation of existing assets towards a zero carbon society;

innovating to discover the cutting-edge business models and develop the breakthrough technologies that are indispensable to allow our industry to lead this transition.

WG Buildings & Energy Efficiency (Lead)
Electrification & Sustainability Committee

Contact:
Gabrielle, Clark, Officer
Energy Policy, Climate & Sustainability
gclark@eurelectric.org

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Union of the Electricity Industry - Eurelectric aisbl
Boulevard de l'Impératrice, 66 – bte 2 - 1000 Brussels, Belgium
Tel: + 32 2 515 10 00 - VAT: BE 0462 679 112 • www.eurelectric.org
EU Transparency Register number: [4271427696-87](https://ec.europa.eu/transparency/regexpert/?s=details&id=4271427696-87)