

European Commission’s proposal for a revised Energy Efficiency Directive (EED)

ESMIG Analysis of amendments to the EED ITRE Report

ESMIG welcomes the European Commission proposal to review the Energy Efficiency Directive. The smart meter is directly linked and indispensable in achieving the energy efficiency targets. Its successful deployment will enable consumer empowerment, measuring and thus managing consumption patterns.

ESMIG would like to comment on specific amendments of this proposal which are relevant for the smart energy management sector.

Articles	Supported Amendments	Justification
9§1	546	The phrase “Competitively priced” is not clear and subject to interpretation. Indeed, this expression doesn’t make sense as the meters are not sold to final consumers and when utilities buy meters, many times this falls under public procurement rules. Thus, it should be specified: “competitively priced with respect to the selected technology and functionalities.”
9§2	550	ESMIG strongly recommends to introduce statements on data access.
9§3	551	ESMIG welcomes the intention of this amendment as the data format for gas smart meters should be considered in the same way as it is for electricity smart meters to ensure consumer protection as well as competition in the retail market. However, articles 23 and 24 on data format of the Electricity Directive review should be included. Thus, this amendment should refer to articles 18-23 and not to articles 18-21.
9a§4	588	Remotely readable devices should be installed as soon as possible.

10§2	595	We agree that accurate bills should be guaranteed when smart meters functionalities are turned on.
10a§2	612	Indeed, Member States shall ensure the privacy and data protection of final customers in compliance with relevant Union data protection and privacy legislation.
Annex VIIa§2	685	The data should be provided “near real time” in order to be used for real time feedback of consumption patterns and Demand Side Flexibility management.
	686	Please refer to ESMIG position on amendment 685.

Articles	Rejected Amendment	Justification
9 title	544	The provisions on metering for gas cannot be deleted: The roll-out of gas smart meters is of utmost importance for consumers as the potential savings are high. Moreover, some Member States (France, Netherlands, United Kingdom and Italy) have already started the roll-out of gas smart meters.
9§1	545	
9§2	548	
9a§1	552	The meters give more (financial) benefits than only energy savings.
	553	
	554	This amendment refers to a very specific case and should not be used to delete the sentence. In the vast majority of the cases the meter gives actual energy consumption by one consumer (family).
	555	This amendment doesn't specify for whom the meters should be "cost-efficient and reasonably priced". The end consumer does not buy a meter and these terms are not defined. Almost all meter sales are by tender, so competition guarantees the cost efficiency and the market determines the reasonableness of the price.

9a§2	560	The conditions mentioned in this amendment are too limited and disproportionate. Regarding the cost-efficiency, please refer to our comments on amendment 555. The proportionality criteria ignores the fact that the whole energy system profits from smart meters, not only the building. Moreover, the wording used would mean that a Cost Benefits Analysis would have to be conducted on each building which would be extremely costly and unreasonable.
	561 562 563 564 565	As in amendment 560, the conditions mentioned are too limited and disproportionate. Please refer to our comments on amendments 552, 553 and 560.
	575	The lack of smart meters will block the introduction of dynamic rates. Moreover, as already mentioned, the benefits are not only realised by dynamic tariffs and are not only for the tenants but for the whole energy system.
	576	Please refer to our comments on amendment 560.
	577	The consumers should not give their consent on the installation of the smart meters. However, they should have control over the information exchanged.
	578	There is no reason to restrict this article to hot water meters. Concerning the second part of this amendment, please refer to our comments on amendment 560.
	579 580 581 582 584 586	Please refer to our comments on amendments 552, 553 and 560.
	587	Please refer to our comments on amendment 555.

9a§4	590	With this amendment, the roll-out would be too slow and will not allow the consumers to fully profit from the benefits offered by remotely readable devices.
	591	The format of the data consumption should be an international standard format.
10	592	Please refer to our comments on amendments 544, 545 and 548.
10§2	594	It makes no sense to refer to "meters" in this context. It should be the "metering infrastructure and related business processes".
10a§1	596	Benefits are not only energy savings. Please refer to our comments on amendments 552, 553 and 560.
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10a§2	611	Please refer to our comments on amendment 591.

About ESMIG

ESMIG is the European voice of the providers of smart energy solutions. Our members provide products, information technology and services for multi-commodity metering, display and management of energy consumption and production at consumer premises.

Our activities are focused around systems for Smart Metering, consumer energy management and safe and secure data transfer.

We work closely with EU policy makers and other EU associations to make Europe's energy and water systems cleaner, reliable, more efficient and the European consumer informed, empowered and engaged.

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