

## **ESMIG Position Paper on the new Energy efficiency measures: Review of the Energy Efficiency and Energy Performance of Buildings Directives**

### **More clarity is essential for an effective implementation**

ESMIG members welcome the proposals for a revision of the Energy Efficiency Directive (EED) and of the Energy Performance of Buildings Directive (EPBD) as parts of the “Clean energy for all Europeans package”. Setting the framework for improving energy efficiency in general and improving energy efficiency in buildings are crucial for achieving the energy transition.

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 elements of these two proposals which are relevant for the smart energy management sector.

### **Proposal for a revised Energy Performance of Buildings Directive: the smartness indicator**

ESMIG supports the objective of the EPBD proposal to encourage the use of ICT and smart technologies and, in particular, the idea to introduce a smartness indicator to measure the “smartness” of buildings. However, the proposal is too vague and contains little indication on what will be included in this tool and how it would be implemented.

We ask for more details in the proposal and call for an open dialogue and ESMIG involvement when defining the indicator through delegated acts.

This indicator should include (but not limit to) the following factors:

- Is there a Smart Meter?
- Is there feedback of (real-time) information to the user of the building?
- Is there an energy management system?
- Can consumption be managed according the electricity system needs?
- Are the appliances and systems interoperable?

Moreover, this indicator should be based on objective criteria and easily understandable for consumers.



ESMIG asks for a more detailed definition of the smartness indicator in the proposal and calls for an open dialogue with stakeholders for achieving this.



## Proposal for a revised Energy Efficiency Directive: Metering

ESMIG agrees with the proposal to amend articles 9 to 11 on metering and billing provisions to ensure the coherence with the internal energy market legislation on gas and electricity. However, we would like to comment on some of the changes in article 9.

Paragraph 1 states that “... *final customers for natural gas are provided with competitively priced individual meters...*”.

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. Moreover, the European Commission admits that the term is ambiguous and allows Member States to avoid the introduction of smart meters: in the accompanying document “Evaluation of the EU Framework for metering and billing”, the Commission states that the term “competitively priced” is not clear, and that “few if any” Member States have interpreted it to require smart meters<sup>1</sup>.



Therefore, the text should be modified as follow: “*competitively priced with respect to the selected technology and functionalities.*”

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. Therefore, the effective roll-out of gas smart meters should be ensured, and to this end, a target date should be set, as it is already the case for the electricity smart meters.



Consequently, the following sentence should be added: “*In 10 years’ time from the positive CBA, the roll-out of gas smart meters should be completed.*”

Even if we do not see the necessity of having a list of recommended functionalities similar to the one for electricity smart meters, we strongly recommend to introduce statements on data access.



ESMIG asks for the following sentence to be introduced at the end of paragraph 2: “*The smart metering system should provide final consumers with access to their energy consumption data and time series based on the market settlement periods.*”

Moreover, 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. The Electricity Directive contains provisions on data format for electricity smart meters.

<sup>1</sup> [Evaluation of the EU Framework for Metering and Billing of Energy Consumption](#), p. 29-30



The same articles (23 on data management and 24 on data format) should be included for gas smart meters.

ESMIG welcomes the new provision on metering for heating, cooling and domestic hot water (new article 9a). However, to ensure that all consumers benefit from these measures as soon as possible a clearer deadline should be added.



Paragraph 4 should be amended as follows: “For the purposes of this Article, two years after this directive comes into effect, meters and cost allocators installed shall be remotely readable devices and provide data to final consumers.” “Meters and cost allocators that have already been installed but which are not remotely readable shall be provided with this capability or be replaced with remotely readable devices within 5 years of this directive taking effect.”

## **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.