EUROPEAN COMMISSION



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Mr Gianfranco FINI President Camera dei Deputati Piazza Montecitorio IT – 00100 ROMA

Dear President,

The Commission would like to thank the Camera dei Deputati for its opinion on the proposal for a new Energy Efficiency Directive {COM(2011) 370} (hereafter EED).

The Commission shares the Camera dei Deputati's views that energy efficiency is vital to meeting the objectives of the climate and energy package and is of key importance for economic and industrial development, GDP growth and job creation. Furthermore, the Commission considers energy efficiency essential beyond 2020 for establishing a low carbon future.

Indeed, improving energy efficiency would inevitably require certain investments. However these costs are recouped in the medium term through the benefits of consuming less energy. Getting on track to achieve the 20% target is estimated to increase EU GDP by ϵ 34 bn in 2020 and increase net employment by 400 000 jobs. The biggest obstacle to linking the benefits and the costs is the insufficiently developed market for energy services and energy efficiency improvements. To this end, market based mechanisms such as energy efficiency obligation schemes are proposed and the establishment of Energy Service Companies (which commit to make the investment and implement the measures in exchange for income from the financial savings on the energy used) is supported.

To further reinforce this process, the Commission proposed, in its proposal on the financing of Cohesion Policy adopted on 6 October¹, to increase significantly the funds for renewable energy and energy efficiency for the period 2014-2020 with a minimum sum of approx. €17 billion to be spent in these policy areas. The Commission also supports initiatives that provide technical assistance for structuring sustainable energy projects (e.g. ELENA facility) and also looks for innovative and more flexible financing mechanisms (e.g. the new European Energy Efficiency Facility established for the unspent EEPR funds).

Regarding the Camera dei Deputati's suggestions that various aspects need to be studied in detail, the Commission would like to highlight that in the preparation of this proposal it has carried out an impact assessment². This assessment is based, among others, on analysis of national and local experiences so far and also includes analysis of the financial and administrative sustainability of each of the measures proposed. The proposed measures were chosen from among a larger number of options because the analysis demonstrated that these measures are economically, socially, and environmentally beneficial. The impact assessment and its accompanying annexes are publicly available³ and have been transmitted to national Parliaments together with the proposal.

Regarding the Camera dei Deputati's specific observations, the Commission would like to highlight the following:

- The EED proposal requires using cogeneration and district heating and/or cooling only to the extent that this suits the economic conditions of a Member State. It should nevertheless be underlined that because of the cooling needs of the residential and commercial sectors and heat requirements for industrial processes there is significant unexploited economic potential also in countries with 'hot' climates.
- Energy audit is an opportunity for each company to identify cost-effective energy efficiency improvements. It represents a relatively small expense compared to the possible cost savings it identifies. To reduce the possible burden, audits are mandated only for large companies and can be carried out by 'internal' experts. Member States can provide additional support, including training, that should however exclude the cost of the energy audit itself.
- Reaping energy efficiency improvements in the transport sector is important for the realisation of the 20% energy efficiency target by 2020. The Commission believes that the measures presented in the recent White paper on Transport until 2050⁴ would deliver the savings required. In any case, the Commission will monitor progress.
- Energy labelling is already mandatory for all energy using products covered by the Energy Labelling Directive (2010/30/EU) for which a delegated act has been adopted.

I look forward to developing our policy dialogue further in the future.

Yours faithfully,

Maroš Šefčovič Vice-president

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³ http://ec.europa.eu/energy/efficiency/eed/eed_en.htm

⁴ COM/2011/0144 final