



Brussels, 23 November 2021

## **FEDARENE's recommendations on the "proposal for a DIRECTIVE OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL on energy efficiency (recast)"**

FEDARENE represents European regions and regional and local energy agencies which for decades have been the European Union's partners in making our green transition happen on the ground. Over 320 local and regional Energy Agencies from across Europe, representing a total workforce of 2500 energy experts, stand ready to translate the Renovation Wave into concrete programmes that leverage massive investments to renovate buildings, integrate renewables, embed circularity, guarantee high health standards and support the digitisation.

As independent market facilitators with public mandates, regional and local energy agencies have been essential delivery agents of the Energy Efficiency Directive as they:

- support public authorities and advocate the exemplary role of public buildings by providing them with technical assistance services and raising their energy efficiency ambitions (art.5 EED);
- implement energy savings certificate schemes within their regions to support the renovation of buildings or the development of sustainable mobility solutions (art.7 EED);
- perform energy audits for the public and private sectors, implement their recommendations, monitor and promote energy management systems (art.8 EED);
- inform and empower consumers through awareness campaigns, training and facilitation services to develop energy communities (art.12 EED);
- contribute to the design and implementation of sustainable heating and cooling solutions and fuel switch strategies at local and regional level (art.14 EED);
- provide adequate and targeted information and advice to relevant market actors regarding available energy efficiency mechanisms and financial and legal frameworks (Art. 17 EED);
- stimulate the energy services market in their territories through their facilitation services and techno-economic competencies in renovation projects (art.18 EED);
- are in permanent dialogue with national and regional legislators in order to take appropriate measures to remove regulatory and non-regulatory barriers to energy efficiency (art.19 EED);
- promote to their national and regional authorities, best practices on innovative financing schemes and technical assistance programmes directed at energy efficiency (art.20 EED).

Based on their collective experience with implementing the EED, our members share through this document the following recommendations and suggestions of amendments.

FEDARENE welcomes the opportunity to meet and discuss the recommendations below in greater detail by providing data and feedback from the ground.

### **Summary of recommendations**

1. Direct support to energy poor households with support from local/regional one-stop shops
2. Public authorities trailblazing for other sectors through energy efficiency facilitation services
3. Non-eligibility of energy savings from measures promoting the use of fossil fuels
4. Enhanced access to energy data for territorial observatories
5. Beyond the obligation of energy auditing: embedding energy efficiency in the business model of companies
6. Management of one-stop shops by local/regional authorities and their energy agencies
7. Accelerated decarbonisation of heating & cooling through upscaling and replication

#### **Members of the European Parliament are invited to note:**

- Underlined text indicates amendments suggested by FEDARENE.

**RECOMMENDATION 1 – Direct support to energy poor households with support from local/regional one-stop shops**

The urgency in supporting energy poor and low income households requires focusing on upscaling and replication of successful initiatives. To this end, public authorities should leverage the existing experience of their local and regional energy agencies on alleviating energy poverty.

As recognised in the proposed new recital (30), Regional and Local Energy Agencies are long-standing supporters of public authorities, assisting them in developing and implementing renovation programmes across Europe. They often serve as one-stop shops accompanying directly households on their renovation journey.

Groups at risk of energy poverty across Europe have benefitted from projects and services delivered by energy agencies such as:

- Developing and managing a regional one-stop shop with neighbourhood offices that provide advice and support to the community through the whole process of renovation of their apartment buildings, in Basque Country ([Opengela](#)). The Opengela EU project has identified interest and need of replicating this one-stop shop model from local and regional authorities and energy agencies from across Europe including Romania, Poland, Greece, Croatia, Ireland, France and Spain.
- Energy efficiency refurbishment of social housing buildings using innovative financing models such as Energy Performance Contracts in Liguria ([Enershift](#)).

Member States should be encouraged to upscale and replicate such initiatives.

**SUGGESTION OF AMENDMENTS**

**Article 5 – Paragraph 3**

**Public sector leading on energy efficiency**

3. Member States shall ensure that regional and local authorities, establish specific energy efficiency measures in their decarbonisation plans after consulting stakeholders and the public, including the particular groups at risk of energy poverty or more susceptible to its effects, such as women, persons with

3. Member States shall ensure that regional and local authorities, establish specific energy efficiency measures in their decarbonisation plans after consulting their energy agencies, the stakeholders and the public, including the particular groups at risk of energy poverty or more susceptible to its effects,



<p>disabilities, older persons, children, and persons with a minority racial or ethnic background.</p>	<p>such as women, persons with disabilities, older persons, children, and persons with a minority racial or ethnic background.</p>
<p><b>Article 22 – Paragraph 3 g) (new)</b></p> <p><b>Empowering and protecting vulnerable consumers and alleviating energy poverty</b></p>	
	<p>3. To support vulnerable customers, people affected by energy poverty and, where applicable, people living in social housing, Member States shall: (...) <u>g) foster the development of one-stop shop renovation services in cooperation with local and regional authorities, and where they exist, their energy agencies.</u></p>
<p><b>Article 22 – Paragraph 4</b></p> <p><b>Empowering and protecting vulnerable consumers and alleviating energy poverty</b></p>	
<p>4. Member States shall establish a network of experts from various sectors such as health sector, building sector and social sectors to develop strategies to support local and national decision makers in implementing energy efficiency improvement measures alleviating energy poverty, measures to generate robust long term solutions to mitigate energy poverty and to develop appropriate technical assistance and financial tools. Member States shall strive to ensure a network of experts' composition that ensures gender balance and reflects the perspectives of people in all their diversity.</p> <p>Member States may entrust the same network of experts:</p>	<p>4. Member States shall establish a network of experts from various sectors such as health sector, building sector and social sectors, <u>including local and regional energy agencies</u>, to develop strategies to support local and national decision makers in implementing energy efficiency improvement measures alleviating energy poverty, measures to generate robust long term solutions to mitigate energy poverty and to develop appropriate technical assistance and financial tools. Member States shall strive to ensure a network of experts' composition that ensures gender balance and reflects the perspectives of people in all their diversity.</p> <p>Member States <u>shall support</u> the same network of experts:</p>

(...)	(...)  <u>(e) to upscale and/or replicate one-stop shops services for vulnerable consumers.</u>
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**RECOMMENDATION 2 – Public authorities trailblazing for other sectors through energy efficiency facilitation services**

While a strengthened EED will provide a clear direction and ambition to Member States, we believe its implementation towards the 2030 targets will depend on enabling frameworks which consist of delivery of technical assistance and strategic market facilitation. To this end we recommend strengthening the cooperation between local and regional authorities and their energy agencies.

Market facilitation services are what lies beyond technical assistance. Facilitation services refer to the proactive technical support provided by local/regional facilitators who are not only providing the technical assistance, but proactively creating the demand for it by advocating the energy efficiency opportunities and value within a territory, embedding it in the broader policy agenda as well as stimulating the energy services market.

Regional and local energy agencies are some of the more common organisations in Europe who play this role of facilitators. As non-profits with public mandates, they have been helping public authorities to achieve and uphold an exemplary role in terms energy reduction by:

- managing one-stop shops upscaling the renovation of public buildings in small and mid-size local authorities ([BAPAURA one-stop shop](#) in Auvergne-Rhône-Alpes);
- launching large scale renovation projects of public buildings and lighting ([ZAGEE project in Zagreb](#));
- aggregating different types of public buildings and launching deep renovation with energy performance contracting and structural funds ([link](#) to project in Maribor);
- undertaking comprehensive rehabilitation of cultural heritage buildings, turning them into regional beacons for sustainability ([rehabilitation of the Bračak Castle](#) in Croatia).

The supporting role of energy agencies has contributed to the success of initiatives such as the Covenant of Mayors and European Energy Award through which local authorities follow interdisciplinary planning approaches and implement effective energy and climate policy measures.

However, in order for the public sector to be truly leading on energy efficiency, public authorities must ensure other sectors follow their lead in the reduction of their final energy consumption, specifically the residential sector representing 2/3 of EU's buildings energy consumption<sup>1</sup>. To this end, Member States should support regional and local authorities and their energy agencies in developing renovation programmes aimed at residential buildings, following successful examples such as:

- [Superhomes](#) one-stop shop for home energy retrofitting, managed by the Tipperary Energy Agency;
- [Opengela](#) one-stop shop addressing vulnerable consumers in Basque Country;
- [Rénov'Occitanie](#) one-stop shop for private households, managed by the Occitanie Regional Energy Agency.

Furthermore, the contribution of energy communities in achieving energy savings should as well be recognised and strengthened throughout the directive, requiring Member States to encourage and support partnerships between local/regional authorities, energy agencies and local initiatives such as energy communities<sup>2</sup>.

## SUGGESTION OF AMENDMENTS

### Article 5 – Paragraph 4 Public sector leading on energy efficiency

4. Member States shall support public bodies in the uptake of energy efficiency improvement measures, including at regional and local levels, by providing guidelines, promoting competence building and training opportunities and encouraging cooperation amongst public bodies.

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<sup>1</sup> <https://www.odyssee-mure.eu/publications/policy-brief/buildings-energy-efficiency-trends.html>

<sup>2</sup> [The EED: supporting energy communities to deliver energy savings](#)

<b>Article 5 – Paragraph 6 (new) Public sector leading on energy efficiency</b>	
	<u>6. Member States shall support regional and local authorities and their energy agencies in developing renovation one-stop shops providing technical and financial advice and solutions to households, through an integrated process.</u>
<b>Article 6 – Paragraph 1 Exemplary role of public bodies' buildings</b>	
1. (...) When concluding a new contract for occupying a building they do not own, public bodies shall aim for that building to fall into the top two energy efficiency classes on the energy performance certificate.	1. (...) When concluding a new contract for occupying a building they do not own, public bodies shall <del>aim for</del> ensure that building <del>to</del> <u>falls</u> into the top two energy efficiency classes on the energy performance certificate.

<b>RECOMMENDATION 3 – Non-eligibility of energy savings from measures promoting the use of fossil fuels</b>
<p>As indicated at recital 50 and in Annex V, energy savings from policy measures regarding the use of direct fossil fuel combustion (e.g. replacement of gas boilers with gas condensing boilers) should not be eligible energy savings under any of the obligations arising from the transposition of this Directive. As correctly highlighted in the EED impact assessment, excluding the possibility for Member States to count energy savings from measures promoting the use of fossil fuels would:</p> <ul style="list-style-type: none"> <li>- be consistent with EU's decarbonisation target of at least 55% which implies a rapid movement away from fossil fuel use, particularly in buildings</li> <li>- reflect that public policy should not reward marginal energy savings gains that lead to stranded assets and slowing down the energy transition;</li> <li>- not have an impact on administrative burden or entail any additional compliance cost;</li> <li>- be fully coherent with all measures in the 'Fit for 55' package and the European Green Deal.</li> </ul>

<b>SUGGESTION OF AMENDMENT</b>	
<b>Article 5 – Paragraph 1 Exemplary role of public bodies’ buildings</b>	
<p>1. Member States shall ensure that the total final energy consumption of all public bodies combined is reduced by at least 1,7% each year, when compared to the year X-2 (with X as the year when this Directive enters into force).</p> <p>Member States may take into account climatic variations within the Member State when calculating their public bodies’ final energy consumption.</p>	<p>1. Member States shall ensure that the total final energy consumption of all public bodies combined is reduced by at least 1,7% each year, when compared to the year X-2 (with X as the year when this Directive enters into force).</p> <p>Member States may take into account climatic variations within the Member State when calculating their public bodies’ final energy consumption.</p> <p><u>Energy savings from measures involving the use of fossil fuel combustion are not eligible energy savings under this article.</u></p>
<b>Article 8 – Paragraph 15 (new) Energy savings obligation</b>	
	<p><u>Member States may not count energy savings that stem from policy measures regarding the use of direct fossil fuel combustion.</u></p>

**RECOMMENDATION 4 – Enhanced access to energy data for territorial observatories**

Access to buildings related data (energy and non-energy aspects) is a fundamental first step for the implementation and monitoring of renovation programmes. Multiple regional energy agencies across Europe developed energy & climate observatories which collect and process energy related data to inform local/regional energy planning and policy making (e.g. the observatories involved in the [ENERGee Watch programme](#)). Energy agencies such as in the Ile-de-France and Auvergne-Rhône-Alpes regions also began monitoring flows of materials in their territories related to the building construction sector, in order to accompany their territorial circular economy strategies and help decarbonize the construction sector.

Countries in central and eastern Europe, where buildings related data is scarce and unreliable, would certainly benefit from the upscaling/replication of such observatories. The Alba Local Energy Agency in Romania has developed the [ANERGO](#) observatory and the Plovdiv Energy Agency developed the [ROECC](#) observatory, however, the development of their services (and of Observatories throughout Europe) are hampered by the reluctance of energy data providers to disclose data, even aggregated data that does not pose any GDPR compliance issues. Implementing art.6§3 EED as well as transposing such initiative to other types of building stocks (residential) will therefore require creating legal obligations to disclose such data to public authorities and their energy observatories, in appropriate formats that are standardized and compatible with sustainable energy planning schemes (e.g. Covenant of Mayors, European Energy Award etc.).

In countries such as Romania utilities have a wealth of energy performance related data that remains underutilized, serving only invoicing purposes. Optimising access to this data would require support for the data sharing partnership approaches that regional energy observatories are trying to develop, in particular with monitoring of the transposition of article 10.6b of the directive on the energy performance of buildings, according to which *“at least aggregated anonymised data compliant with Union and national data protection requirements shall be made available on request for statistical and research purposes and to the building owner”*.

**SUGGESTION OF AMENDMENT**

**Article 6 – Paragraph 3  
Exemplary role of public bodies’ buildings**

<p>3. For the purposes of this Article, Member States shall make publicly available an inventory of heated and/or cooled public bodies' buildings with a total useful floor area of more than 250 m<sup>2</sup>. This inventory shall be updated at least once a year. The inventory shall contain at least the following data:</p> <p>(a) the floor area in m<sup>2</sup>; and</p> <p>(b) the energy performance certificate of each building or relevant energy data issued in accordance with Article 12 of Directive 2010/31/EU.</p>	<p>3. For the purposes of this Article, Member States shall make publicly available an inventory of heated and/or cooled public bodies' buildings with a total useful floor area of more than 250 m<sup>2</sup>. <u>At local and regional levels where such inventories already exist, Member States shall take appropriate measures to facilitate the data collection and processing activities related to these inventories.</u></p> <p>This inventory shall be updated at least once a year. The inventory shall contain at least the following data:</p> <p>(a) the floor area in m<sup>2</sup>; and</p> <p>(b) the energy performance certificate of each building or relevant energy data issued in accordance with Article 12 of Directive 2010/31/EU.</p>
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**RECOMMENDATION 5 - Beyond the obligation of energy auditing: embedding energy efficiency in the business model of companies**

**Implementation of energy audit recommendations**

The mere obligation of performing audits has created a market for lower quality and less expensive audits that do not produce changes in the companies as their recommendations don't focus enough on economically viable solutions, changes in processes or embedding energy efficiency in the business cases of companies. Energy audit recommendations that take these elements into consideration are more likely to be implemented. Following successful initiatives such as "[Industrial Energy Transition Leaders](#)" in Upper Austria, recommendations of energy audits should focus on:

- integrating an energy management system that involves the enterprise's top management in the process;
- proposing key steps towards adopting energy and CO<sub>2</sub> indicators as key performance indicators of the company, and including them in the company's strategic decision-making process;
- proposing tools that enable a company to preliminarily quantify their CO<sub>2</sub> emissions in a simple manner, using limited input data (some measures are

too complex to quantify, but a preliminary calculation would allow progress on the energy management decisions);

- proposing company-specific “energy transition roadmaps” that are developed in an interactive process with the employees, and that contain clear goals, measures in orders of priorities, and technology options;

### **Obligations backed by enabling frameworks for SMEs**

For companies to effectively uptake energy efficiency measures, obligations must be accompanied by support programmes. As small and medium sized companies (with average annual consumption over 10 TJ as described in the proposed EED) usually have a reduced management board and limited energy expertise within their staff, Member States should develop specific support programmes in order to simplify the development of the energy audit or energy management system integration, and focused on accelerating the implementation of sustainable energy measures.

To this end, the Commission’s EU Corporate Covenant initiative is very welcomed as it aims at supporting companies of all sizes to commit to GHG emission reduction and progressively implement a well-prepared action plan. Programmes that promote energy transition as a competitive advantage within companies should also:

- support the quantification and communication of multiple benefits of energy transition measures within companies (productivity increase through better indoor conditions for people and machines, risk reduction for energy cost fluctuations, employer attractiveness etc.);
- support mechanisms for the aggregation of several companies (as by means of an association, network etc.) to simultaneously develop their energy audits or energy management systems;
- develop energy transition networks of SMEs in the frame of which companies can receive expert support to establish good energy management practices, draw inspiration from others; in countries such as Sweden or Germany such networks were successful in developing an energy culture<sup>3</sup> and demonstrating energy measures can be drivers for competitiveness; similar networks were successful for public authorities (e.g. Covenant of Mayors, ManagEnergy, European Energy Award) and could be transferred to the business sector, as reasons for inaction regarding energy transition measures are often similar (lack of management attention, internal expertise, transparency of consumption, financing etc.). Experienced facilitators such as

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<sup>3</sup> See Paramonova, S., & Thollander, P. 2016. Energy-efficiency networks for SMEs: Learning from the Swedish experience. *Renewable and Sustainable Energy Reviews*, 65, 295-307. Available at: <https://www.sciencedirect.com/science/article/pii/S1364032116303227>

energy agencies are already managing such networks in certain areas of Europe (see Energy transition leaders example above).

## SUGGESTION OF AMENDMENTS

### Article 11 – Paragraph 4

#### Energy management systems and energy audits

4. Member States shall develop programmes to encourage SMEs that are not subject to paragraph 1 or 2 to undergo energy audits and the subsequent implementation of the recommendations from these audits.

4. Member States shall develop programmes to encourage SMEs that are not subject to paragraph 1 or 2 to undergo energy audits and the subsequent implementation of the recommendations from these audits, respecting the minimum criteria set out in Annex VI.

For the purpose of this paragraph, Member States shall ensure the programmes include:

a) integration of energy management systems involving the management of the enterprise, including financial incentives with the commitment of the enterprise to uptake the energy efficiency measures identified;

b) support to SMEs in quantifying the multiple benefits of energy efficiency measures within their operations;

c) development of company-specific “energy transition roadmaps” developed in an interactive process, with a prioritization of goals, measures and technological options;

d) develop energy transition networks of SMEs, facilitated by independent facilitators.

e) support mechanisms for the aggregation of several companies (as by means of an association, network, etc.) to simultaneously develop their energy audits or energy management systems.

**ANNEX VI - MINIMUM CRITERIA FOR ENERGY AUDITS INCLUDING THOSE CARRIED OUT AS PART OF ENERGY MANAGEMENT SYSTEMS**

The energy audits referred to in Article 11 shall be based on the following guidelines criteria:  
(...)

The energy audits referred to in Article 11 shall be based on the following guidelines criteria:  
(...)

(c) identify energy efficiency measures to decrease energy consumption and propose company-specific energy transition roadmaps developed in an interactive process, with a prioritization of goals, measures and technological options;

(d) propose key steps and tools towards adopting energy and CO2 indicators as key performance indicators of the company;

**RECOMMENDATION 6 – Management of one-stop shops by local/regional authorities and their energy agencies**

**One-stop shops serving territorial and economic development**

We welcome the recognition of one-stop shops in the EED revision proposal as an effective mechanism for upscaling the renovation of households. However, in order for these one-stop shops to be drivers for territorial and economic development, it is essential to link their development and management to permanent structures such as local/regional authorities and their energy agencies.

Such as indicated in recommendations 1 & 2, many local and regional energy agencies already operate such one-stop shops to provide tailored advice the multiple targets groups including public authorities, households and vulnerable consumers. Local and regional energy agencies are ideal candidates to manage such integrated renovation services as they have: public mandates from municipalities and regions; have cross-sectorial expertise; knowledge of the renovation value chains; ready-to-use networks of stakeholders across sectors and governance levels.

### Independent market facilitation services

The market facilitation services of local/regional energy agencies maximise the impact of their one-stop shops as they focus on :

- demand: providing tailored direct advice to public authorities, companies and citizens ensuring they benefit from deep renovation;
- supply: preparing local/regional supply chains to match the demand, thus locally anchoring the economic benefits of the renovation programmes and embedding it in the territorial development strategies.

Market facilitation services are what lies beyond technical assistance. Facilitation services refer to the proactive technical support provided by independent local/regional facilitators who are not only providing the technical assistance, but proactively creating the demand for it by advocating the energy efficiency opportunities and value within a territory, embedding it in the broader policy agenda as well as stimulating the energy services market.

Regional and local energy agencies are some of the more common organisations in Europe who play this role of facilitators. The facilitation model of energy agencies can be broken down in 3 key steps:

1. Activation (informing the multiple target groups of their options);
2. Support to project development (coaching during decision making with technical and financial advice, feasibility studies, best practice transposition);
3. Support to project implementation (financial, legal and technical assistance, and post-project evaluation and monitoring).

This regional energy agency facilitation model has been behind some of the most ambitious regional energy efficiency policies and renovation programmes in Europe<sup>4</sup>, leading to outstanding primary energy savings, CO<sub>2</sub> reductions, and billions of euros invested in sustainable energy. This facilitation model has already leveraged significant large scale investments evidenced by results from the ManagEnergy service<sup>5</sup>. Unless this facilitation model is recognised, and resourced, ambitious concepts/investments at local and regional level will not be translated into realised energy and carbon savings.

To this end, the revised articles 21 and 27 of the EED should encourage Member States to create one-stop shops including the above objectives and characteristics.

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<sup>4</sup> FEDARENE repository of case studies focusing on energy efficiency: [link](#)

<sup>5</sup> ManagEnergy 2017-2020 [Publishable Report – Energy Agencies Leading the Energy Transition](#)

<b>Article 21 – Paragraph 2 (i) Information and awareness raising</b>	
<p>(...) For the purposes of this article, these measures shall also include but not be limited to the following ways and means to engage market actors such as those referred in paragraph 1: (i) creation of one-stop shops or similar mechanisms for the provision of technical, administrative and financial advice and assistance on energy efficiency, including energy renovations of buildings and the take-up of renewable energy for buildings to final customers and final users, especially household and small non-household ones. (...)</p>	<p>(...) For the purposes of this article, these measures shall also include but not be limited to the following ways and means to engage market actors such as those referred in paragraph 1: (i) creation of one-stop shops or similar mechanisms, <u>in cooperation with local and regional authorities and their energy agencies</u>, for the provision of technical, administrative and financial advice and assistance on energy efficiency, including energy renovations of buildings and the take-up of renewable energy for buildings to final customers and final users, especially household and small non-household ones. (...)</p>
<b>Article 27 – Paragraph 6 (c) Energy services</b>	
<p>(c) setting up and promoting the role of advisory bodies and independent market intermediaries including one stop shops or similar support mechanisms to stimulate market development on the demand and supply sides, and making information about those support mechanisms publicly available and accessible to market actors.</p>	<p>c) setting up and promoting the role of advisory bodies and independent market intermediaries including <u>local/regional energy agencies</u>, one stop shops or similar support mechanisms to stimulate market development on the demand and supply sides, and making information about those support mechanisms publicly available and accessible to market actors.</p>

## RECOMMENDATION 7 – Accelerated decarbonisation of heating & cooling though upscaling and replication

FEDARENE welcomes the new paragraph 6 of article 23 requiring Member States to encourage regional and local authorities to prepare local heating and cooling plans. However, the development of such plans should be encouraged also for municipalities having a total population below 50.000, corresponding to the majority of Europe's municipalities. These plans must be implementation oriented, going beyond the mapping of RES-based heating potential step, and focus on a roadmap of concrete actions as well as strategy to implement them. Enforcement and monitoring will be essential.

As independent facilitators with public mandates, energy agencies in many areas of Europe are already supporting local/regional authorities to develop and implement heating & cooling plans. Through their energy & GHG observatories specialized on buildings performance (e.g. the [Ile-de-France Observatory for multi-apartment buildings](#)) they centralize data from multiple sources and enable regions to have a reliable picture of their building stocks, RES potentials and identify the renovation needs and potential.

With this type of data as well as market analysis, regional energy agencies are able to develop tailored heating fuel switch programmes and one-stop shop models such as:

- Tipperary Energy Agency's [Superhomes](#) one-stop shop performs energy retrofitting including switching to RES heat pumps;
- Upper Austrian Energy Agency's "[AdieuÖ!](#)" campaign is replacing thousands of old oil boilers across the region.

These approaches require accelerated upscaling as well as replication across EU's regions. Multiple local decarbonization plans already exist but require actual implementation.

To this end, regional and local energy agencies should be associated to the measures provisioned in article 23 EED. In accordance with the proposed new recital 30 of the Energy Efficiency Directive, Member States should make use of the experience and know-how of local and regional energy agencies in order to consolidate the local capacity to prepare, finance and implement comprehensive heating and cooling projects in coordination with renovation programmes.



SUGGESTION OF AMENDMENT	
<b>Article 23 – Paragraph 6</b> <b>Heating and cooling assessment and planning</b>	
	<p><u>(f) be prepared with the involvement of the local or regional energy agencies, where they exist;</u></p> <p><u>(g) include a market analysis to identify and understand the target groups and propose tailored programmes.</u></p> <p><u>In regions where plans similar to the ones described in §6 already exist, Member States shall develop programmes supporting their implementation through measures such as the development of one-stop shop renovation services and RES-based heating campaigns.</u></p> <p>(...)</p> <p>Member States shall support regional and local authorities <u>and their energy agencies</u> to the utmost extent possible by any means including financial support and technical support schemes.</p>

FEDARENE welcomes the opportunity to meet and discuss the recommendations above in greater detail by providing data and feedback from the ground.

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**FEDARENE** (European Federation of Agencies and Regions for Energy and the Environment) is the collective voice on the energy transition for regions and regional energy agencies. FEDARENE's members drive the energy transition and climate action in their territories through ambitious policy development and strategic facilitation actions.

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