

# Public consultation on the review of progress towards the 2020 energy efficiency objective and a 2030 energy efficiency policy framework

INFORMATION ABOUT THE RESPONDENTS	
Are you responding to this questionnaire on behalf of/as: -single choice reply-( <b>compulsory</b> )	Organisation
Please enter your name or the name of your company/organisation: -open reply-( <b>compulsory</b> )	European Power Plant Suppliers Association - EPPSA
Please indicate your principal country or countries of residence or activity: -single choice reply-( <b>compulsory</b> )	Belgium
How would you prefer your contribution to be published on the Commission website, if at all? -single choice reply-( <b>compulsory</b> )	Under the name indicated (I consent to publication of all information in my contribution and I declare that none of it is under copyright restrictions that prevent publication)
A. Energy efficiency targets and measures	
1. Do you think the right approach in addressing the shortfall is:  -multiple choices reply-( <b>compulsory</b> )	a) To define energy efficiency target(s)
1.a.1. How should these target(s) be expressed? -single choice reply-( <b>compulsory</b> )	In terms of energy intensity improvements of the economy and economic sectors
1.a.2. At what level should they apply? -multiple choices reply-( <b>compulsory</b> )	EU
1.a.3. Should they be: -single choice reply-( <b>compulsory</b> )	Legally binding
Further comments on targets -open reply-( <b>optional</b> )	
Efficiency targets should be given the same importance both in energy generation and in end-use consumption. Thus, binding energy efficiency targets in power generation should be pushed for, as the transition towards a progressively decarbonised economy will not be possible without back-up power.	
B. Energy efficiency sectors	
2. Do you think that further policy measures are needed at EU level to foster energy efficiency in buildings?  -single choice reply-( <b>compulsory</b> )	No opinion
3. Do you think that further policy measures are needed at EU level to foster energy efficiency in industry?	Yes

-single choice reply-(optional)	
Please give details. -open reply-(optional)	
4. Do you think that further policy measures are needed at EU level to foster energy efficiency in transport? -single choice reply-(optional)	No opinion
5. Do you think that further policy measures are needed at EU level to foster energy efficiency in electrical equipment? -single choice reply-(optional)	No opinion
6. Do you think that further policy measures are needed at EU level to foster energy efficiency in generation and distribution? -single choice reply-(optional)	Yes
Please give details. -open reply-(optional)	
<p>One attempt to have binding policy measures for energy efficiency on the generation side was Art. 19 Nr. 5 of the EED, which allows the Commission only to propose remediating measures, not to impose them if BAT is not met. There should be a binding commitment from the EU to make BAT energy efficiency levels binding in thermal power generation and establish a timeline for LCPs to comply with it. But on the one hand the LCP BREF will set up binding efficiency thresholds for new builds and existing power plants, and on the other hand MS are implementing or have implemented strategic reserves or other forms of capacity mechanisms that often extend the lifetime of older power plants without incentivising their improvement. On an EU level, a single capacity mechanism design is needed to prevent further fragmentation of the internal energy market. Optimally, this design should incentivise newer, more efficient, flexible, and part-load efficient thermal power generation.</p>	
7. Do you think that further financial mechanisms and instruments are needed at EU level to mobilise energy efficiency investments? -single choice reply-(optional)	Yes
Please give details. -open reply-(optional)	
<p>There is a huge potential for energy efficiency improvements on the supply side, given the big number of existing, not state-of-the-art, fossil fuel plants. Since the thermal plants will be needed in the future energy system at least for back-up of RES, these investments are necessary for the energy system, which even with a low coal price dont always make sense economically. Incentivising plants to meet BAT according to the Commissions LCP BREF must be an EUs objective. Capacity mechanisms should therefore not incentivise inefficient old plants. What is urgently needed is a mix of incentives for new and existing plants, where efficiency improvements will be economically and environmentally interesting. Additionally, accompanying measures such as the establishment of effective targeted financing mechanisms for R&amp;D&amp;D projects improving efficiency in power plants should be envisaged.</p>	
8. Do you think that further measures are needed to build the capacity of actors in the energy efficiency sector? -single choice reply-(optional)	No opinion
9. What are the most promising technology solutions that can help deliver energy savings in the 2020 and 2030 time horizon? How can their development and uptake be supported at EU level? -open reply-(optional)	
10. Further comments -open reply-(optional)	