



2017-09-25

eceee press release

EPBD must focus on reducing energy needs and avoid double-counting of renewables

As the negotiations on the Energy Performance of Buildings Directive (EPBD) revision proceeds, eceee has noted some worrying signs that threaten to deliver less savings, contradict the “energy efficiency first” principle and create unwanted side effects on the renewables side. In particular, the proposed discounting of off-site renewables must be removed from the proposals.

eceee believes that energy efficiency first means that energy demand should be reduced as far as possible before the remaining energy needs are supplied by renewables. This principle is necessary to secure long-term sustainable building and to save more energy, resources and money.

Conflicting logic

The proposed discounting in EPBD Annex 1 of both on-site and off-site renewables in the calculations is in conflict with the logic of first reducing energy demand (= energy needs and uses) before renewables are integrated in buildings, in order to avoid wasting valuable energy.

Furthermore, the discounting of off-site renewables implies a *double counting* of renewables from the grid; once at the macro level (where it changes the national PEF) and once at the micro level if, as under the present proposal, it is accounted for in the primary energy balance of the building.

Hence, eceee believes that the discounting of off-site renewable energy production must be removed from the proposed revised text of Annex I EPBD.

Ambiguous wording

Part of the problem stems from the ambiguity in the current EPBD Annex I, which on one side correctly states that it is necessary to use *two* indicators: “[t]he energy performance of a building shall be expressed in a transparent manner and shall include an energy performance indicator and a numeric indicator of primary energy use ...”

But on the other side, unfortunately, the current EPBD Annex I omits to recall that the energy performance indicator is based on the energy demand, i.e., the energy needs of the building, as it is stipulated in Art.2 (Definitions): ‘energy performance of a building’ means the calculated or measured amount of energy needed to meet the energy demand associated with the typical use of the building...”

Needed clarifications

Further Annex I is unclear on the crucial issue of the primary energy factor.

We therefore suggest the following clarifications to be inserted in Annex I:

1. *energy performance indicator = energy needs for heating, cooling and hot water and energy use for lighting and ventilation, as defined in EN15603:2008*



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2. *numeric indicator of primary energy use = a weighted primary energy balance defined as in EN15603:2008, calculated on monthly or shorter time intervals*

The detailed technical background for the above proposals can be found in the comments of eceee during the consultation phase, [here](#).

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