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SWEDENERGY's position paper on the proposals for the DIRECTIVES OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL amending Directive 2010/31/EU on the energy performance of buildings (EPBD)

Swedenergy is a non-profit industry and special interest organisation for companies involved in the supply, distribution, selling and storage of electricity, heat and cool. As the united voice of the Swedish energy sector, the organisation monitors and promotes the interests of its members and the energy sector in general.

Swedenergy has a total of 400 members. These include state-owned, municipal and private sector companies as well as associations of different types.

The Swedish Energy System

During the past 60 years Sweden has built up one of the world's most efficient energy systems. The heat market is, together with the electricity market, the largest energy market in Sweden, with a turnover that amounts to SEK 100 billion and 100 TWh. Our well-developed district heating system enables us to utilize energy resources that would otherwise be wasted (such as waste heat from industry and energy recycling of waste). Combined heat and power ensures the best possible use of resources.

Energy efficiency must be viewed in a holistic perspective and is governed and affected by extensive legislation on national and EU-level in parallel. Extensive EU-legislation has developed over the recent years and is now being reviewed such as the directive on the energy performance of buildings, the directive on energy efficiency and the renewable energy directive with links to energy performance of buildings.

Position on the revised Directive 2010/31/EU on the energy performance of buildings (EPBD)

- The article on renovation in EED (chapter 2, article 4) should be moved to EPBD (article 2a) and should not be binding on MS level.
- We support the proposal for infrastructure for electro-mobility in new non-residential buildings and existing non-residential buildings undergoing major renovation. The introduction of electro-mobility is important to achieve the ambitions of a fossil-free transport sector.
- We support the proposal in Annex 1 to determine the energy performance of a building by the actual energy use. A technology neutral and competitive approach to the energy performances for a building must be applied. Renewable energy must be calculated and valued equal regardless of the size of the production unit. EPBD must lead to decreased demand of energy and capacity in buildings and more efficient energy use. The supply of renewable energy should be covered in the renewable energy directive.

- Primary energy factors shall discount the share of renewable energy in energy carriers so that calculations equally treat: (a) the energy from renewable source that is generated on-site (behind the individual meter, i.e. not accounted as supplied) and (b) the energy from renewable energy sources supplied through the energy carrier.
- Detailed governing of “smartness indicators” for buildings (article 23) should be avoided. Flexibility between different technical solutions must be ensured. Technical development is very fast in this area and prescriptive provisions concerning the “smartness indicator” may quickly become obsolete. The member states should instead develop the necessary requirements linked to such indicators.