




E.DSO reaction to the Council General Approach on the Energy Performance of Buildings Directive (EPBD)

Distribution System Operators (DSOs) and the EPBD:

E.DSO represents more than 350 million customers connected to 38 DSOs from all over Europe. Distribution System Operators are the key enablers of the energy transition fostering the integration of renewable energy sources, the deployment of energy efficient solutions and the empowerment of customers. In view of the crucial role DSOs play for the integration of Electric Vehicles (EVs), distributed Renewable Energy Sources (RES), Flexibility Services and the deployment of smart grids, the recast of the Directive is of utmost importance.

This paper presents the **main recommendations** of DSOs in view of the recently adopted **General Approach (GA) of the Council** concerning the proposal of the Commission to recast the Directive on the energy performance of buildings.

The table below analysis the GA Council with the following symbols illustrating E.DSO's **support** , **ideas for improvement**  or **rejection** 

AMENDMENTS



Amendments by the Council to the definition of **zero-emission buildings (ZEBs)** obliges Member States to consider requirements determined in accordance with Annex I **and Article 9b (new)**, **replacing Annex III** originally foreseen in the Commission's proposal (Article 2(2)).



E.DSO considers the new condition, related to **Article 9b as still very ambiguous**, when it comes to allowing for the use of energy from the grid to cover the total annual primary energy use of ZEBs. Where the use of other renewable or low carbon energy resources listed under point (a) to (d), are technically and economically not feasible, **the inclusion of energy from the grid is important as it ensures the protection of consumers from e.g. distortions or additional cost and allows smart buildings to benefit from the decarbonised electricity of the system.**



The Council sticks to the Commission's proposal for the **definition of 'energy from renewable sources produced nearby'** which considers **public service electricity network** with 'energy produced within a local or district level perimeter of the building assessed' (Article 2 (49)).



The Council should consider that the deliberate exclusion of energy from the grid in this definition could cause **increased system costs for the consumer, redundancy in the overall process and eventual non-alignment to the Electricity Directive 2019/944.**

AMENDMENTS



Council requirements for the **national building renovation plans** (Article 3).



In line with the Commission's REPowerEU proposal, the Council inserted an article on '**Solar energy in buildings**' with several amendments (Article 9a).



The Council calls on Member States to ensure **pre-cabling and ducting dimensioned so as to enable simultaneous use of recharging points** in the framework of the obligations on 'Infrastructure for sustainable mobility' for new non-residential buildings and non-residential buildings undergoing major renovation (Article 12 (1) and (4)).

E.DSO POSITION



E.DSO stresses the need to **reintegrate former subparagraph (f)** urging Member States to include 'an overview of national initiatives to promote **smart technologies** and **well-connected** buildings and communities, as well as **skills and education** in the construction and energy efficiency sector' in the national building renovation plans.

The Article should be **properly connected with the Smart Readiness Indicators** of the buildings according to Annex IV.



E.DSO welcomes the addition of Article 9a and in particular the attention Member States shall give to the **stability of the electricity network** when defining criteria for the practical implementation of the deployment of suitable solar energy installations.



To further improve the obligations, we recommend, however, to integrate a **pre-condition regarding the need to ensure network availability**.



The additions to Article 12 in order to enable simultaneous use of recharging points should take into consideration the **necessity of using smart management with respect to load capacities and network needs**. **The simultaneous use of all recharging points cannot be considered efficient**.

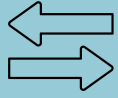
There is a need of setting the **right conditions when pursuing** the objectives of a sustainable mobility Infrastructure in buildings, such as **grid reinforcement considerations and demand side management solutions taking into account grid needs**.



E.DSO welcomes the acknowledgement of the importance of **smart and bi-directional charging** (Article 12 (6)).

AMENDMENTS

E.DSO POSITION



Data exchange requirements (*Article 14*)



E.DSO believes that it is **necessary to ensure DSOs access to data on distributed resources** in order to guarantee the optimal operation of the network at all times.

We therefore advocate for the inclusion of the same in Article 14 of the recast.



The GA of the Council **kept the Commission's wording** in the **common general framework for rating the smart readiness of buildings** (*Annex IV*).



E.DSO welcomes the **preservation of the obligation to include 'flexibility of building's overall electricity demand in relation to the grid'** as a key functionality in the methodology used to define smart readiness.



Above that, we stress that the methodology for assessing the Smart Readiness of buildings should also consider the interoperability between the buildings and network system. Therefore, we suggest the integration of **'Network Operators System' in Annex IV, Point 3 (d)**.