

Overview of EED reporting requirements

Executive Summary

WGR 1.1

Core theme 1
Working Group Report 1

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1.1 Overview of EED reporting-related requirements and the NEEAP template

The new Energy Efficiency Directive (EED) has a very broad scope and includes several reporting, notification and other reporting-related requirements. In addition to annual reports and National Energy Efficiency Action Plans (NEEAPs) every three years, there are many other reporting and/or notification requirements in different articles and annexes.

In the EED, annual reports provide a basis for monitoring the progress towards national 2020 targets while the NEEAPs provide a framework for the development of national energy efficiency strategies. In addition to those regular reports there are more specific notifications and/or assessments or publishing requirements related to specific issues, articles and annexes. Some of those are optional depending on whether Member States (MS) choose to implement certain provisions. Nevertheless, there are more than ten kinds of special notifications and more than ten assessment/publishing/ justification obligations in addition to the annual reports and NEEAPs in the EED. Some of the due dates for these obligations are harmonised with annual reports or NEEAPs but some are not, hence there are special timelines for some obligations.

According to the EED, the European Commission (COM) shall provide a template as guidance for the NEEAPs ¹. The template is not obligatory but its use is recommended. The minimum information to be included in the NEEAP is specified in the EED Annex XIV. The Commission has also provided guidance supporting the use of the NEEAP template. According to the information from the Commission, only compulsory elements as required in EED are included in the template while the guidance also includes optional but still recommended reporting elements. Those optional parts include additional information related to the EED reporting requirements or e.g. Energy Performance of Buildings Directive (EPBD) reporting obligations which are recommended to be reported in the NEEAP.

Target setting and time frames seem to be a challenge

At the time of writing² the different Energy Efficiency Directive targets and how these are related and connected remain a challenge for many MS. For example the indicative target referred to in Article 3, the obligatory target set in Article 7 and the Article 5 target on central governmental buildings, as well as the ESD target, are considered difficult to separate. In addition MS implementing organisations are entrusted with the task of informing and explaining the Energy Efficiency Directive to relevant stakeholders at national level which in turn is proving difficult.

The timeframe for the first Energy Efficiency Directive reports and notifications in 2013 were considered demanding and concern was expressed by many MS regarding the possibility to produce the quality of information aimed for by the Energy Efficiency Directive. Reports and notifications in 2013 comprise of the notification of the national indicative target and 1st Annual Report by 30th April 2013 and the notification of opting for the alternative approach to the energy efficiency obligation scheme and the methodology for the purpose of energy efficiency obligation schemes, Article 7(9) and Article 20(6) by 5th December.

The requirement within the Energy Efficiency Directive to include all measures when setting the target as required by Article 3 was considered problematical in practical terms, as many will not yet have a clear picture of the exact measures and policies that will be adopted or needed in order to move towards the achievement of their energy efficiency target.

In order to fulfil the reporting and notification requirements set by the Energy Efficiency Directive Member States indicated that their resources will be stretched to their limits and beyond those earmarked for ESD reporting.

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¹ When this report was written only a draft COMMISSION IMPLEMENTING DECISION of XXX establishing a template for National Energy Efficiency Action Plans under Directive 2012/27/EU of the European Parliament and the Council was available. However no major changes are expected.

² March 2013

1.2 Added value

Due to its broad scope the Energy Efficiency Directive includes a lot of reporting, notification, publishing and other assessment obligations for MS in different articles and annexes. The reporting timelines for all these obligations and some other specific implementation provisions are not the same. CA EED participants research focuses only on the obligations that require developing, publishing and/or delivering documents with defined special contents and purposes to the Commission. Separation of the obligations for the EED makes it easier for MS to keep track of them and their due dates.

Research through CA EED participants provides Ministries and implementing bodies alike with a tool enabling them to develop their own check lists for reporting. In addition it distinguishes between the different forms of reporting supporting the furtherance of general EED understanding.

Guidance on NEEAP reporting will be provided in the Commission Staff Working Document that will complement the Implementing Decision on the NEEAP template; this is expected to be published in May 2013. Once published both the Implementing Decision and the Guidance document will be available via the DG Energy website at http://ec.europa.eu/energy/efficiency/eed/eed_en.htm.

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The Concerted Action for the Energy Efficiency Directive (CA EED) was launched by Intelligent Energy Europe (IEE) in spring 2013 to provide a structured framework for the exchange of information between the 29 Member States during their implementation of the Energy Efficiency Directive (EED).

For further information please visit www.eed-ca.eu or contact the CA EED Coordinator Lucinda Maclagan at lucinda.maclagan@agentschapnl.nl



