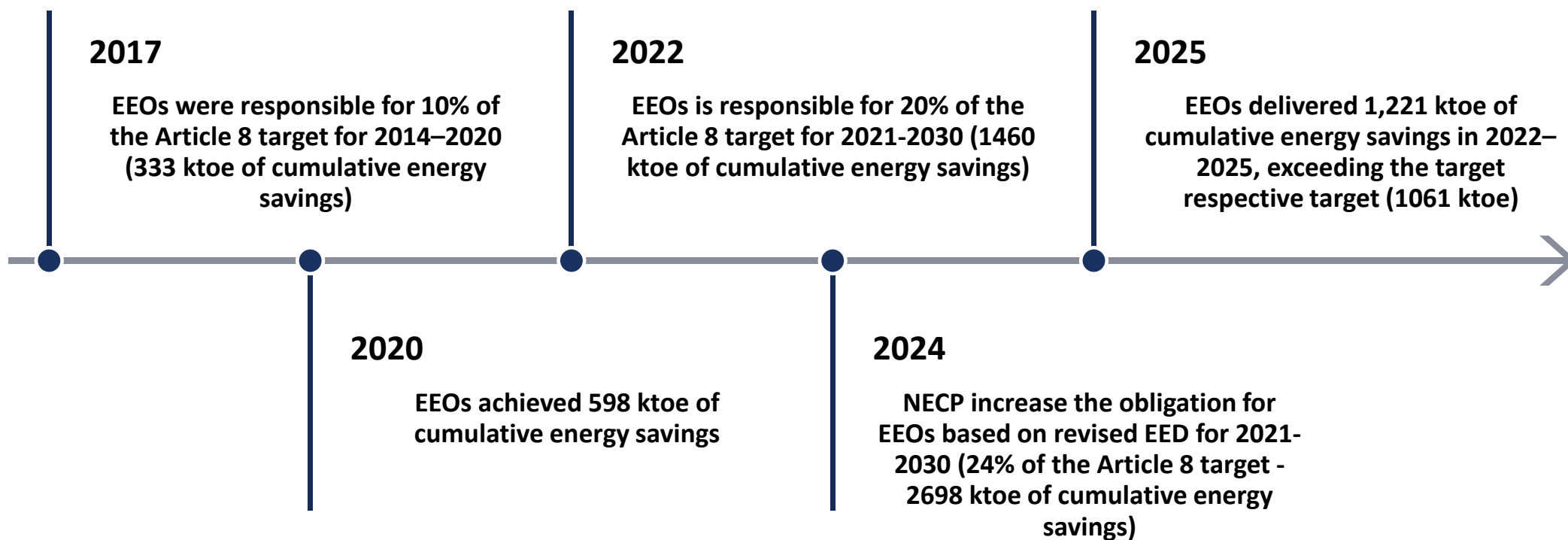


On-bill financing as a mean to alleviate energy poverty and vulnerability within the Social Climate Plan

Christos Tourkolas
CRES

CA-EED 9th Plenary meeting
Vilnius, 23/10/2026

Energy Efficiency Obligation Scheme



Challenges of the existing renovation programmes

Delays in application assessments, approvals, and grant disbursements

Excessive bureaucracy, complex procedures, extensive documentation requirements, and high administrative costs

Frequent changes to programme terms and conditions

Financing difficulties, particularly in covering beneficiaries' own contributions and securing upfront financing

Limited accessibility for low-income and energy poor households, despite the provision of high subsidy rates

Limited predictability due to the absence of a stable, long-term financing framework

Delays in repaying the involved contractors

Provisions of policy framework

- Enhance the effectiveness of existing programmes
- Increase the mobilization of private capital
- Prioritize the most cost-effective energy efficiency interventions
- Promote the uptake of innovative financing mechanisms

NECP (2024)

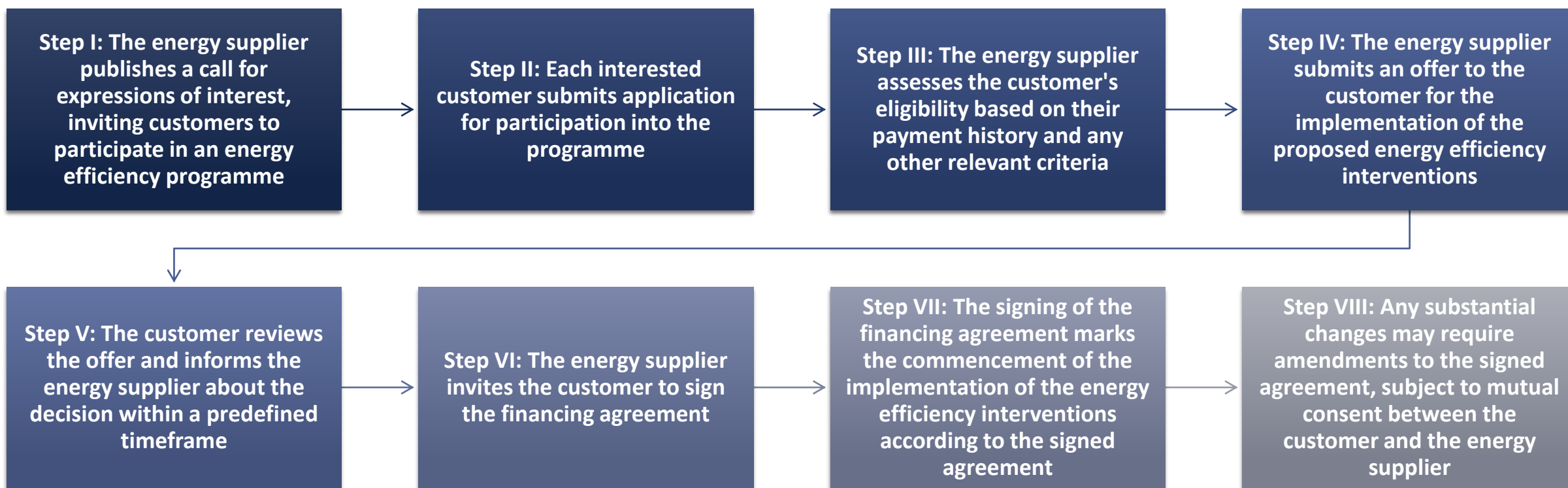


- Competitive tendering/auction schemes for energy efficiency improvements
- Development of a regulatory framework for on-bill financing of energy efficiency interventions
- Promotion of Energy Performance Contracts (EPCs) in the public sector
- White Certificates (Energy Efficiency Certificates)

Roadmap for Energy Savings in Buildings (2025)



Roadmap for Energy Savings in Buildings (2025) - Recommended steps for the application of the on-bill financing



Adoption of the legislative framework for the application of on-bill financing framework



ΕΛΛΗΝΙΚΗ ΔΗΜΟΚΡΑΤΙΑ
ΥΠΟΥΡΓΕΙΟ ΠΕΡΙΒΑΛΛΟΝΤΟΣ
ΚΑΙ ΕΝΕΡΓΕΙΑΣ

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11 Μαΐου 2026

ΤΕΥΧΟΣ ΔΕΥΤΕΡΟ

Αρ. Φύλλου 2633

ΑΠΟΦΑΣΕΙΣ

Αριθμ. ΥΠΕΝ/ΔΗΕ/52139/767

Τροποποίηση της υπουργικής απόφασης «Κώδικας Προμήθειας Ηλεκτρικής Ενέργειας σε Πελάτες» (Β' 832/2013), όπως ισχύει.

Ο ΥΠΟΥΡΓΟΣ ΚΑΙ Ο ΥΦΥΠΟΥΡΓΟΣ ΠΕΡΙΒΑΛΛΟΝΤΟΣ ΚΑΙ ΕΝΕΡΓΕΙΑΣ

Έχοντας υπόψη:

- Τον ν. 4001/2011 «Για τη λειτουργία Ενεργειακών Αγορών Ηλεκτρισμού και Φυσικού Αερίου, για Έρευνα, Παραγωγή και δίκτυα μεταφοράς Υδρογονανθράκων και άλλες ρυθμίσεις» (Α' 179) και ιδίως τα άρθρα 51, 52, 138 και 196.
- Τον ν. 4622/2019 «Επιτελικό Κράτος: οργάνωση, λειτουργία και διαφάνεια της Κυβέρνησης, των κυβερνητικών οργάνων και της κεντρικής δημόσιας διοίκησης» (Α' 133).
- Το π.δ. 27/2025 «Διορισμός Υπουργών, Αναπληρωτή Υπουργού, Υφυπουργών και Αντιπροέδρου της Κυβέρνησης» (Α' 44).
- Την υπό στοιχεία ΥΠΕΝ/ΥΠΡΓ/37371/2512/4.4.2025 κοινή απόφαση του Πρωθυπουργού και του Υπουργού Περιβάλλοντος και Ενέργειας «Ανάθεση αρμοδιοτήτων στον Υφυπουργό Περιβάλλοντος και Ενέργειας, Νικόλαο Τσάφρο» (Β' 1660).
- Το π.δ. 70/2015 (Α' 114) περί μετονομασίας του Υπουργείου Παραγωγικής Ανασυγκρότησης, Περιβάλλοντος και Ενέργειας σε Υπουργείο Περιβάλλοντος και Ενέργειας.
- Το π.δ. 132/2017 «Οργανισμός Υπουργείου Περιβάλλοντος και Ενέργειας (ΥΠΕΝ)» (Α' 160).
- Τον Κώδικα Προμήθειας Ηλεκτρικής Ενέργειας σε Πελάτες (Β' 832/2013).
- Τον Κώδικα Διαχείρισης του Ελληνικού Δικτύου Διανομής Ηλεκτρικής Ενέργειας, που εγκρίθηκε με την υπ' αρ. 395/2016 (Β' 78/2017) απόφαση της ΡΑΕ.
- Τον Κώδικα του Διαχειριστή ΑΠΕ και Εγγυήσεων Προέλευσης, όπως εγκρίθηκε με την υπ' αρ. 509/2018 (Β' 2307) απόφαση ΡΑΕ.
- Την υπ' αρ. 1443/2020 απόφαση ΡΑΕ «Θέσπιση Εγχειριδίου Εκπροσώπησης Μετρητών και Περιοδικής Εκκαθάρισης» (Β' 4737).
- Την υπό στοιχεία Ε-3/2026 Γνωμοδότηση του Κλάδου Ενέργειας της Ρυθμιστικής Αρχής αποβλήτων, Ενέργειας και Υδάτων για την τροποποίηση του Κώδικα Προμήθειας Ηλεκτρικής Ενέργειας σε Πελάτες (Β' 832/2013) αναφορικά με την παροχή πρόσθετων υπηρεσιών βελτίωσης ενεργειακής απόδοσης εγκατάστασης.
- Το υπό στοιχεία ΥΠΕΝ/ΔΗΕ/50770/744/06.05.2026 υπηρεσιακό σημείωμα της Γενικής Διεύθυνσης Ενέργειας προς τη Γενική Διεύθυνση Οικονομικών Υπηρεσιών του Υπουργείου Περιβάλλοντος και Ενέργειας.
- Την υπό στοιχεία ΥΠΕΝ/ΔΠΔΑ/50775/1277/06.05.2026 εισήγηση της Γενικής Διεύθυνσης Οικονομικών Υπηρεσιών του ΥΠΕΝ (αρ. εισερχομένου: ΥΠΕΝ/ΔΗΕ/50989/747/06.05.2026).
- Το γεγονός ότι σύμφωνα και με την υπό σημείο 15 εισήγηση της Γενικής Διεύθυνσης Οικονομικών Υπηρεσιών ΥΠΕΝ, από τις διατάξεις της παρούσας απόφασης με την προτεινόμενη τροποποίηση του ΚΠΗΕ δεν προκαλείται επίπτωση στον κρατικό προϋπολογισμό.
- Το γεγονός ότι οι διατάξεις της παρούσας δεν αφορούν σε διοικητική διαδικασία για την οποία υπάρχει υποχρέωση καταχώρισης στο ΕΜΔΔ - ΜΠΟΣ, αποφασίζουμε:

The owner of a facility may enter into an agreement with an electricity supplier for the provision of additional energy efficiency improvement services at their facility

Repayment of the costs associated with these additional services, including financing costs, may be made through the electricity bill corresponding to the specific facility

In the event of partial payment of the electricity bill by the customer, the charges associated with these additional services shall be allocated and collected last

The electricity supplier shall not be entitled to request the disconnection of the customer's electricity meter from the competent network operator

The customer's right to switch electricity suppliers shall not be restricted or hindered, in accordance with the applicable legislation

Introduction of a dedicated billing category for additional energy efficiency services, covering both the supply and installation of equipment and the financing of energy efficiency improvement works



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Social Climate Plan (adopted in end of August 2026)



Key figures

- The Greek plan will mobilise **close to €4.8 billion** between 2026 and 2032
- Investments in the buildings sector total **€2.91 billion**
- Investments in the road transport sector total **€1.46 billion**



**Affordable
housing**



**Energy
renovation of
buildings**



**Public
transportation**



**Individual
mobility**

Context

- Greece is affected by high levels of energy and transport poverty, and more than **1.7 million households** and **1.4 million transport users** are expected to be significantly affected by the inclusion of buildings and road transport under the EU Emissions Trading System ([ETS2](#))
- These are **low and lower-middle income households**, exposed to increasing energy or transport costs, who face structural barriers such as living in energy-inefficient housing, having limited access to public transport and residing in remote and rural areas
- Greece's Social Climate Plan includes measures and investments that will **durably reduce energy and transport poverty, ensuring affordable heating, cooling and mobility**

Energy renovation of buildings within Social Climate Plan



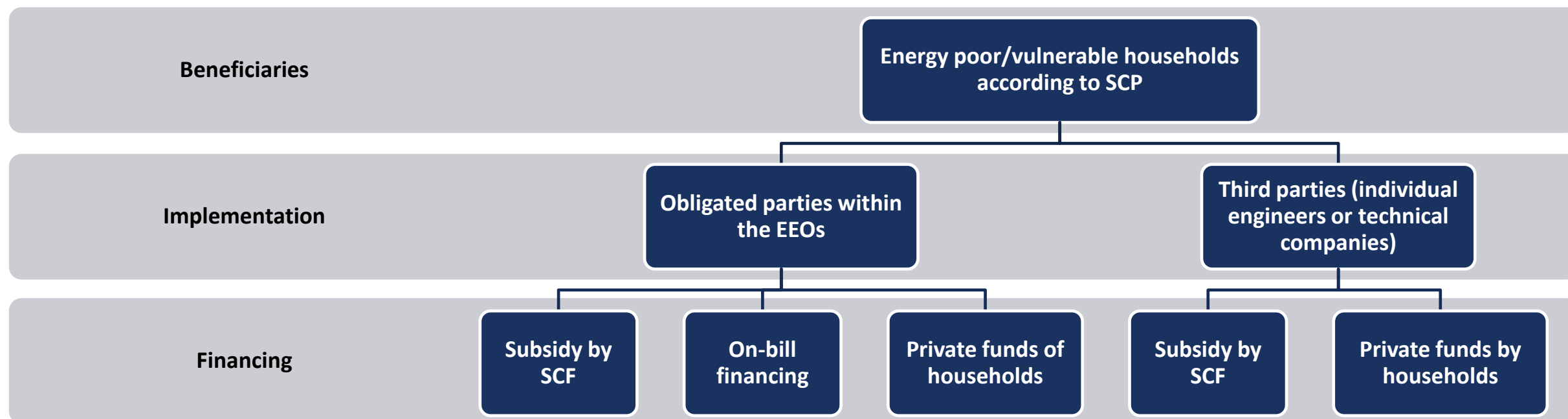
Energy renovation of buildings

- Vulnerable households can receive funding for energy renovations to **improve their homes' energy efficiency, reduce energy consumption and lower related costs**. Energy efficiency upgrades of residential buildings (€1 748 million), supporting the energy renovation of 62 000 dwellings and the installation of at least 200 000 energy-efficient appliances (heat pumps and solar heating) replacing **old fossil fuel-based equipment**. Moreover, they will be supported to install **solar panels**, lowering electricity bills through self-generation and increasing energy independence.
- **Energy efficiency upgrades of vulnerable microenterprises' buildings** (€396 million), supporting the energy renovation and/ or the installation of energy-efficient appliances. The investment will support approximately 9 350 microenterprises, focusing on sectors facing high energy costs.
- Establishment of 13 one-stop-shops across the country (€17.8 million), providing **free guidance and advisory support** to vulnerable households and microenterprises.

Measure/Investment: 31: Energy efficiency upgrades

Sub-investment 1: Energy efficiency upgrades of residential buildings for energy vulnerable households

Sub-investment 2: Support for replacing outdated and energy-intensive heating and hot water systems (heat pumps and solar heating)



Associated milestones: **Q1 2027:** Formal adoption of the amended legislative framework for Energy Efficiency Obligation and **Q2 2027:** Launch of the call for applications under Sub-investments 1 and 2

Role of on-bill financing

Sub-investments 1 & 2 aim to introduce **on-bill financing that can operate independently or in combination with grants.**

On-bill financing aims to **facilitate access by vulnerable households to energy efficiency upgrades** while ensuring **affordability, transparency, consumer protection, and appropriate regulatory oversight.**

The scheme will mobilize on-bill financing mechanisms, allowing eligible households to **implement energy-efficiency upgrades without upfront or with limited upfront costs**, and then **repay the investment gradually through their electricity or gas bills.**

The repayment of the obligated party could be carried out through an **on-bill financing scheme for a predefined period**, agreed between the obligated party and the energy vulnerable end-user.

Repayment conditions will be designed to remain **affordable and predictable.**

Price fluctuations are not foreseen, as the **repayment mechanism will relate solely to the repayment of energy-efficiency interventions** and will not depend on **realized energy savings or energy price variations.**

The participation of energy providers in the scheme is primarily expected to broaden their customer base and enable **the provision of additional energy-related services.**

Measures to protect energy vulnerable households

1. **Clear and standardized contractual information** on investment costs, public support, repayment terms, estimated savings, and complaint procedures
2. **Competitive market** as energy providers will not be de facto responsible for the implementation of energy efficiency upgrades, with vulnerable households maintaining the right to choose independent engineers or contractors outside the on-bill financing scheme
3. **Monitoring and control mechanisms** by the competent national authorities to ensure compliance with consumer-protection
4. **Technical validation and verification of financed interventions**, including checks on costs, quality of upgrades, and compliance with energy-performance objectives.

Main challenges

Limited repayment capacity

Investments cannot be fully recovered within reasonable repayment periods

Limited consumer awareness and trust

Unwillingness of obligated parties to participate and decision to buy-out the obligation

Unclear rules for supplier switching and options for debt recovery

High administrative and transaction costs particularly for small investments

Thank you for your attention!!!

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