

To: Permanent Representations to the European Union,
Energy and Climate Attachés

Brussels, 27 September 2017

Reliable and transparent governance system requires binding templates

Dear Attaché,

Ahead of your discussions on 28th September on the Governance Regulation, I would like to share our concerns about the compromise proposal dated 20th September 2017.

The Coalition for Energy Savings, a unique coalition representing industry, environmental, consumer, cooperatives and local authorities' interests, supports an accountable and robust governance system for the Energy Union. In that context, we would like to stress our support for binding planning and reporting templates, as proposed by the Commission in Articles 3, 15 and 19, Annexes I, II and VII.

The wording in Article 3-1 proposed by the compromise text weakens the legal requirement for Member States to present their National Energy and Climate Plans consistent with the template included in Annex I.

The development of National Energy and Climate Plans opens up opportunities for Member States to consider the potential of energy efficiency before making decisions and drafting legislation impacting the energy system. Transparency and comparability is needed to ensure the highest level of accountability, to build buy-in from citizens and stakeholders, and to create investor certainty.

More recommendations can be found in our [position paper](#) on the Clean Energy for All Europeans Package. We are looking forward to continue engaging with you on this very important matter. In the meantime, please do not hesitate to come back to us, should you have questions about our views.

Yours Sincerely,

Marion Santini

The Coalition for Energy Savings (AISBL) strives to make energy efficiency and savings the first consideration of energy policies and the driving force towards a secure, sustainable and competitive European Union. Its membership unites businesses, professionals, local authorities, trade unions, consumer and civil society organisations in pursuit of this goal. The Coalition calls on the EU to commit itself to a 40% energy saving target by 2030, and to step up policies, measures and investments in order to stop energy waste and tap the considerable energy savings potentials. Coalition members represent:

- more than 500 associations and 200 companies
- 15 million supporters and more than 2 million employees
- 2,500 cities and towns in 30 countries in Europe

Members of the Coalition are:

Architects' Council of Europe (ACE), BEUC (The European Consumer Organisation), CEE Bankwatch Network, ClientEarth, Climate Action Network Europe (CAN-Europe), Climate Alliance, COGEN Europe, E3G, ECOS (The European Environmental Citizens Organisation for Standardisation), Energy Cities, Euroheat & Power (EHP), European Alliance of Companies for Energy Efficiency in Buildings (EuroACE), European Alliance to Save Energy (EU-ASE), European Association for the Consumption-based Billing of Energy Costs (EVVE), European Association of Polyurethane Insulation Manufacturers (PU Europe), European Climate Foundation, European Committee of Domestic Equipment Manufacturers (CECED), European Copper Institute, European Council for an Energy Efficient Economy (ecee), European Environmental Bureau (EEB), European Federation of Intelligent Energy Efficiency Services (EFIEES), European Federation of Building and Woodworkers (EFBWW), European Insulation Manufacturers Association (Eurima), European Federation of Public, Cooperative & Social Housing (Housing Europe), European Partnership for Energy and the Environment (EPEE), Friends of the Earth Europe, Glass for Europe, LightingEurope, REScoop, Transport & Environment (T&E) and WWF, as well as advisory members Buildings Performance Institute Europe (BPIE) and Regulatory Assistance Project (RAP).