

To: Miguel Arias Cañete, Commissioner for Climate Action and Energy

Brussels, 18 October

An enabling environment for energy efficiency to be reflected in climate and energy modelling

Dear Commissioner,

The Coalition for Energy Savings is following with much attention your efforts to create an enabling framework for energy efficiency. We would like to congratulate you for the progress made recently and bring to your attention what we believe will be the next challenge, the revision of the energy modelling methodology.

Under your leadership, energy efficiency first has become more than a slogan. The publication of the updated guidance note on the recording of energy performance contracts (EPCs) in government accounts will in particular unblock suspended public investment decisions.

This will lower the costs of reaching energy efficiency targets, which will ease the political discussions. We believe that this should also change the parameters used by the Commission's energy and climate modelling and impact assessment:

Firstly, lower costs should not be ignored in the upcoming update of the 2030 renewable energy and energy efficiency 2030 targets.

Secondly, a broader reflection should start on improving the approach and methodology used for climate and energy modelling and appraisals to avoid basing decisions on outdated cost assumptions and missing out on the enabling effects of new policies and measures to bring down market barriers. Indeed, and despite the improvements which were brought to the modelling for the Clean Energy Package, the current methodology lacks transparency, remains conservative in assessing costs and does not reflect the impact of policies on energy efficiency investment costs.

In that context, the update of the 2050 roadmap provides an opportunity to embed energy efficiency as the bedrock of ambitious climate policies in view of achieving the goals of the Paris agreement.

We call on you to ensure that the upcoming climate and energy modelling work benefits from a broad and open dialogue with stakeholders from the start of the process, and are looking forward to making our expertise available.

Yours sincerely,



Stefan Scheuer

Secretary General, The Coalition for Energy Savings



The Coalition for Energy Savings 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, cooperatives, 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, 200 companies, 1,240 cooperatives
- 15 million supporters, more than 2 million employees and 650,000 members of cooperatives
- 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, E3G, ECOS (The European Environmental Citizens Organisation for Standardisation), Energy Cities, 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 (eceee), 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, REScoop, Transport & Environment (T&E) and WWF, as well as advisory members Buildings Performance Institute Europe (BPIE) and Regulatory Assistance Project (RAP).