EFIEES

Brussels, 13th October 2025

EFIEES' views on EU energy security architecture

***EFIEES** is the voice of private energy service companies (ESCOs) and their national associations across Europe. Our members represent over 100.000 professionals committed to the design and implementation of energy efficiency measures in public and private buildings, industrial facilities, as well as to the efficient operation of district heating & cooling networks.*

EFIEES welcomes the Commission's intention to revise the EU energy security framework to ensure that our energy system remains secure and resilient in the face of increasingly complex and evolving challenges. In recent years, marked by energy crises and a volatile geopolitical context, energy security has rightly become a central concern and a top priority for the EU institutions.

As highlighted by the Commission in its call for evidence on the revision of the energy security architecture, the recent fitness check revealed a continued need to strengthen preparedness for both supply shocks and evolving demand patterns, particularly in light of the expected rise in electricity demand driven by the energy transition. Strengthening the EU's energy security requires not only reducing dependence on external energy imports, but also ensuring that Europe's energy needs are reliably met through a stable, affordable, and sustainable supply for all citizens and industries.

To address this dual challenge, the EU's energy security architecture must evolve beyond its current scope, which today relies mainly on the Gas Security of Supply Regulation[1] and the Electricity Risk Preparedness Regulation[2]. **Energy security should indeed not be viewed solely through the prism of supply-side measures such as risk mitigation and source diversification but should also systematically integrate demand-side considerations**. In that regard, EFIEES welcomes the fact that the forthcoming Heating and Cooling Strategy and Electrification Action Plan will be developed under the umbrella of the revised energy security framework.

This framework should thus further include and promote decarbonised and efficient thermal solutions, including local renewable sources, waste heat recovery and district networks, that play a vital role in balancing the system by **providing flexibility, additional storage solutions, containing costs, and in ensuring security of supply, particularly during peak demand periods.**

[1] Regulation (EU) 2017/1938 of the European Parliament and of the Council of 25 October 2017 concerning measures to safeguard the security of gas supply and repealing Regulation (EU) No 994/2010 (, 280 OJ L § (2017). http://data.europa.eu/eli/reg/2017/1938/oj/eng.

[2] Regulation (EU) 2019/941 of the European Parliament and of the Council of 5 June 2019 on risk-preparedness in the electricity sector and repealing Directive 2005/89/EC. https://eur-lex.europa.eu/eli/reg/2019/941/oj

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EU Transparency Register ID : 25748484862-49

Moreover, **energy efficiency and sufficiency** should also be fully integrated within the EU energy security framework as a strategic component. **Energy management solutions** can notably make a decisive contribution by guaranteeing long-term energy and CO_2 performance while encouraging behavioural change among consumers. By fostering energy sufficiency and integrating diverse energy sources, such solutions help contain demand and enhance system integration. Moreover, most of energy management solutions projects are based on low upfront-costs thus being an easy instruments to put in place when it comes to containing energy demand and thus strengthening energy security.

By optimising demand and managing peak consumption, **energy efficiency measures enhance system flexibility and resilience**, directly supporting EU energy security. The energy we neither use nor produce is not only the cleanest, preventing shortages, reducing the need for storage, and easing pressure on grids. **Demand-side measures and energy efficiency should therefore not only be better integrated into the EU energy security architecture, but recognised as one of its central pillars.**

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