

Views on amended energy reporting templates (NECPs)

Energy Efficiency for Europe (formerly 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.

Energy Efficiency for Europe welcomes the Commission's proposal for a revision of Implementing Regulation (EU) 2022/2299 to update the templates and procedures governing Member States' energy reporting obligations. **Ensuring that reporting frameworks adequately reflect the implementation of the Fit for 55 package and the objectives of the European Green Deal is essential**, while efforts to streamline and simplify reporting requirements are also welcome.

However, **simplification must not come at the expense of effective monitoring and accountability**. The full and timely implementation of EU energy and climate legislation by Member States remains critical to achieving the Union's climate objectives and energy transition. This requires robust monitoring of national targets, policies and measures, supported by transparent, consistent and comprehensive reporting obligations.

More specifically, the proposed merging of several **"renewable" cooling sources** within a single line in **Table 4 of Annex II** "Decarbonisation: Renewable Energy", raises concerns. It merges a broad range of technologies with different levels of energy efficiency, thereby reducing the granularity and usefulness of the reported data. As cooling demand is expected to increase substantially in the coming years, becoming a key adaptation measure to climate change, **reporting requirements should preserve sufficient detail to distinguish between technologies and properly reflect the contribution of the most energy-efficient solutions**.

Similar concerns regarding simplification apply to **Table 3 of Annex IV** on energy efficiency. While the proposed changes reflect the evolution of the Energy Performance of Buildings Directive from Long-Term Renovation Strategies to National Building Renovation Plans, the **dedicated lines specifically reporting on the renovation of worst-performing residential and non-residential buildings have disappeared**. Yet, this information is particularly important. Alongside the overview of the building stock provided in Table 2, Table 3 would allow to monitor the renovation rate of worst-performing buildings, which is a key indicator for assessing whether renovation policies effectively target the least efficient segment of the building stock. Renovation efforts



should indeed focus on worst-performing buildings, as they deliver the greatest social, economic and environmental benefits per intervention.

Lastly, the proposed revision introduces a **new Table 2 in Annex XVII** on additional reporting requirements related to energy efficiency, notably regarding progress on energy audits and energy management systems under Article 11 of the revised Energy Efficiency Directive. However, Article 11 also provides that enterprises implementing Energy Performance Contracts are exempt from these obligations. The reporting template should therefore explicitly reflect this exemption and related figures to ensure consistency with the Directive and avoid incomplete or misleading reporting.