European Association of Electrical Contractors
Association Européenne de l'Installation Electrique

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Kortenberg, 20 October 2010

The AIE represents the Electrical Contracting Industry in Europe which comprises about 200,000 enterprises, the vast majority of which are SME's, having a combined turnover in the order of 70 Billion Euro and a workforce of more 1,000,000 people.These electrical installation enterprises work directly for end users, building contractors, domestic home owners, commercial landlords,industrial businesses etc. in newand existing premises. In addition they are the traditional advisor on all electrical matters that the clients turns to.

The electrical contractors (installers) therefore play a significant part in the achievement of the EU energy targets.

In the framework of the Revision of the EU Energy Efficiency Action Plan (2010/2107(INI)), the AIE acknowledges the draft report of the Rapporteur Bendt Bendtsen and hereby has the following comments:

Specific point:

The most important point we hereby would like to address is linked to the Eco-design directive mentioned in item 20-23.

It is stated in item 20 that '*the Directive on Eco-design should also cover ....integrated lighting systems in buildings'...* and in item 23 '...*make sure that legislation addresses products, systems and their energy use ...'*

The AIE does not support the development to move from a 'product' approach towards a 'system' approach, as it is anti-competitive, will stiffle innovation and stop mixing/matching to provide the best value solution and would directly interfere with the installer's business. This is also not in the interest of the end-user or the whole electrical value chain.

First of all, we should not forget that the spirit of the Eco-design Directive was to have energy efficient design requirements for products and this should remain as such. Enlarging the scope of the Directive to systems would be an unreasonable distortion of the original spirit, which is to be avoided for a piece of legislation.

It should equally be considered whether the wording in item 20 & 23 in relation to other pieces of legislation such as the Energy Services Directive and the Energy Performance of Buildings Directive would not cause additional confusion when implementing energy efficient measures.

As stated in the beginning of this AIE position, the AIE represents 200.000 electrical contracting companies in Europe with about 1 million workforces. Those electrical contractors design, install and maintain intelligent systems for all kinds of industrial, commercial and domestic purposes alongside the well-known power and lighting applications. They deal with ICT and telecommunications, public street lighting, control and energy management systems, access, fire and security control equipment, lightning protection systems, advertising and identification signs and emergency power generating systems and renewable energy systems.

It should be noted that this electrical work and advise is undertaken in new and existing premises and if European energy targets are to be achieved, the be-spoked retro-fit work in existing buildings will be a sizeable proportion and the real challenge to overcome. As an example, more than 60% of the existing domestic electrical installations are undermaintained and do not even comply with the current standards.

These companies play a crucial role in providing the public purchaser, the industrial customer and/or the residential end-user with energy efficient technical solutions taking his energy, financial, environmental and social needs into account.

Installing ‘intelligent’ technical control systems relies however on the freedom of the installer to select and choose the system components as to best respond to the individual energy needs of the client!

The system approach will however result in the delivery of ‘standard’ one-manufacturer-systems (packages), whose energy efficiency assessment will have been tested in a specific location, in specified circumstances and applications. Instead of a system approach which will stifle innovative solutions, open protocols should be promoted (such as e.g. KNX) as to enable combining energy, efficiency, electrical engineering and “intelligence”. The combination of individual components to form new customized solutions, is a characteristic of creative solutions.

This is denying the individual and specific needs of each customer and the existing practical expertise of the electrical contracting companies. The neutral and independent energy advice of a professional electrical contractor is of utmost importance to raise the consumer's awareness and respond to his specific needs.

Market experience indeed demonstrates that clients do not need legislation to understand that intelligent technical systems can result in energy savings and bill reduction.
Indeed electrical contractors already propose energy efficient measures and intelligent control systems with performance contracts to their clients, which contractually ensure that the quality of the work and the energy savings are already actively controlled.

We don't believe that the so-called system approach will either boost the energy efficiency market or increase the competitiveness in the economy and in the electrical engineering market or even respond to society and end-user's energy needs.

For our member companies, with a majority of SME's, who work in all the previously mentioned areas, these requirements will only limit their capacity of work. It will also add complexity and unnecessary administrative burden in an economically difficult period for implementing satisfactory energy efficient solutions they already deliver today to the market.

General considerations on the draft report of the Rapporteur Bendt Bendtsen:

Introduction

1) We need to be careful with statements such as "the payback period for investments in energy efficiency is short" (D) as most of time, this is not necessarily true. It is even in contradiction with the necessity of using public funds as to have financial incentives and instruments for energy efficiency measures (E).

Compliance with and implementation of existing legislation

2) Whereas the EU has set its 20-20-20 targets by 2020, the progress regarding energy efficiency is much too low and the energy efficiency targets will not be reached. Though energy efficiency is recognised as having the biggest potential, with today's projections, the energy efficiency's target will reach only about 9% in 2020.

As long as the 20% target for energy efficiency is not compulsory for EU Member States as are the 2 other targets, it is to be expected that Member States will not take 'energy efficiency' seriously and put the

necessary and appropriate measures and instruments in place to increase energy efficiency.

We therefore fully support the suggestion made under item 1 which is to have binding energy efficiency targets.

3) Under item 3, further to very different situations at national level, it might indeed be an advantage to have national scoreboards with flexible targets which would give Member States appropriate means to choose their main focus areas and instruments. However, as stated previously, without any mandatory and binding energy efficiency targets, a flexible national scoreboard would probably not help to boost Member States' efforts and motivation!

Moreover to be able to rank and correctly benchmark Member States' objectives, actions and achievements, at least a common European skeleton/framework of the scoreboard should exist.

Energy infrastructure

4) We strongly support an even stronger focus on system innovations such as smart grids, smart metering and energy storage (7).

In this framework the promotion of regional and local pilot Smart Cities projects wherein all relevant market players are involved from the project design stage should be increased (11).

However, the success of the smart meters will be dependent on the end-user and consumer's awareness and confidence. We strongly believe and are convinced that the neutral and objective role of the electrical contractor as first contact person for the end-user should be recognised and emphasised.

Urban development and buildings

5) We strongly support the promotion of performance contracting under item 16 but the AIE calls for more awareness raising and information towards the financial bodies and SME'S. It has been shown that banks and financial institutions, who have understood the concept, create win-win situations.

In particular, financial incentives and information available at regional level would even further increase awareness towards SME's that performance contracting is also available and accessible for them.

6) The AIE firmly supports the need to promote and integrate the principle of total life cycle costs in item 19 (as suggested for lighting in

the Digital Agenda) instead of lowest price as a criterion in choosing the 'best' (lighting) system.
This principle should however not be restricted to lighting installations only but extended to all electrical and electro technical systems.

ICT and products

7) See comments under item 1.

8) All electrical contractor companies are not only the first contact person towards the customer but represent also an army of competent companies able to contribute significantly and efficiently to deploy energy services and install new technologies.

9) The AIE indeed supports to extend the scope of the EPBD to large buildings; there is no reason not to have them covered under the scope of the Directive.

Transport

10) The role of electrical contracting companies, in the deployment of the electric vehicles (charging stations, adaptation of the infrastructure) and also towards the end-user, should be emphasized much more.. The crucial role of the electrical contracting companies is often forgotten when deploying the electro technical and technological infrastructure of our future society in Europe.

Incentives and financing

11) In the framework of item 38, suggesting pushing energy companies to invest in energy efficiency measures, it should be analyzed whether schemes such as the white certificates scheme implemented e.g. in France and Italy could be supported and generalized in Europe.

Proof has been given in France that such schemes can boost investment as the system has reached higher objectives than expected without using the penalties towards the energy companies.