



Law

Feedback from: Renewables Norway

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Submitted by	Jon Erling Fonnelløp
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Organisation	Renewables Norway
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Country of origin	Norway
Initiative	Energy efficiency – legal framework after 2030 (./info/law/better-regulation/have-your-say/initiatives/17452-Energy-efficiency-legal-framework-after-2030_en)

'Renewables Norway represents the renewable energy industry in Norway. We work to ensure that Norway becomes a zero-emissions society as quickly as possible, with growth and value creation based on renewable energy, electrification, and other emission-free energy use. Our members come from across the industry, including renewable energy production on land and offshore, grid companies, financial institutions, contractors, electricity retailers, suppliers, and consultants. Renewables Norway supports the objectives of the Energy Efficiency

Directive regarding efficient energy use (Article 1) and the energy efficiency first principle (Article 3). Efficient use of energy is absolutely essential to achieving greenhouse gas emission reductions and ensuring sufficient power supply for the electrification of all areas of society. Efficient utilisation of all available energy (heat and electricity) is also crucial for maintaining legitimacy for further development of power generation and grid infrastructure. Article 4 of the Directive sets a target for energy savings and a cap on total energy consumption in the EU. It is important that such a cap does not hinder the transition to a renewable and zero-emissions energy system. Electrification of industry and the business sector will require significant amounts of energy. It is problematic that the energy efficiency targets in the Directive are set as a cap on final energy consumption, rather than establishing targets for energy intensity or carbon intensity. Energy efficiency targets must not obstruct green industrial development based on renewable energy or lead to carbon leakage through industrial relocation. Nor should energy efficiency targets limit the use of renewable electricity for the production of hydrogen and other energy carriers through electrolysis, pyrolysis, or other power-intensive technologies that can create value within the renewable energy system and are necessary for the green transition. There is significant potential for energy efficiency improvements and reduced energy consumption in the building stock. Buildings have a lifetime of 50-100 years, and EU regulations must provide incentives both for energy-efficient new buildings and for the renovation of the existing building stock. Article 22 of the Directive addresses information measures and awareness-raising related to energy savings and energy efficiency measures for end customers and consumers. Relevant stakeholders are to be included in this work. Renewables Norway believes that actors in the renewable energy industry play an important role in promoting efficient energy use and the optimal utilisation of the power grid, and several of our members are already actively engaged in this through their dialogue with end customers and households. Article 24 of the Directive requires countries to take necessary measures to strengthen and protect vulnerable groups in the energy transition. Renewables Norway believes it is crucial to achieve a socially just transition. Policy instruments, support schemes, and redistribution are essential to ensure that citizens and customers are included in the transition. Article 25 of the Directive addresses efficiency in heating and cooling supply. Renewables Norway believes that effective coordination between municipalities, grid companies, and district heating providers is

essential when planning infrastructure and co-locating production and consumption, to ensure optimal utilisation of available surplus heat and grid capacity. Renewables Norway supports the Directives requirement for cost-benefit analyses for data centres and other operations with high energy demand. We believe that conditions must be facilitated for better integration between thermal and electrical energy within the energy system. Increased utilisation of surplus heat in commercial operations and district heating for building heating frees up electricity and grid capacity for further electrification.'

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All feedback

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