

# Die Wohnungswirtschaft Deutschland



## GdW Statement

Concerning Directive of the European Parliament and of the Council amending Directive 2012/27/EU on energy efficiency COM(2016) 761 final as part of the proposed package of measures "Clean Energy for All Europeans"

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# Concerning Directive of the European Parliament and of the Council amending Directive 2012/27/EU on energy efficiency COM(2016) 761 final

## Introduction

The housing sector welcomes the aim of the package to supply EU consumers with safe and clean energy. Overall however, the questions regarding housing and investment costs are neglected as well as the issue of affordable housing and building. In several EU countries (e.g. Germany) construction and renovation costs for social / affordable housing are not covered by the government or municipalities. Higher construction or renovation costs lead to higher rents. The explanations of the directive mention that the proposal strengthens the social aspects of energy efficiency by requiring that energy poverty must be taken into account in designing energy efficiency obligation schemes and alternative measures. The decrease in energy bills will also be of particular benefit to the most vulnerable consumers.

This view, however, is one-sided. Every investment needs to be financed. Interest and repayment costs are incurred which for many years are higher than the saved energy costs. In several Member States (e.g. Germany) these costs are not taken over by the public authorities. In particular energy standards, which are prescribed by the German EnEV cannot be funded. With additional obligatory measures the basic rent (without operating costs) will therefore increase for rented dwellings. This increase in rent is practically always higher than the energy cost savings. Additional measures in Germany may thus reduce energy poverty, but overall housing costs will increase. This causes difficulties for affordable housing as a whole.

The EU focusses on the economic impact of cost-efficient modernizations on the EU economy. The interplay between "profitability for the investor" versus "affordability for the tenant" in the housing market is not being looked at.

The importance of measures affecting several sectors and regulatory areas is growing. This applies both to energy efficiency, renewable energies and climate protection, which in the building sector cannot be looked at separately anymore, as well as heat market, e-mobility, decentralized electricity generation and "smartness", including repercussions on the grids which influence each other.

GdW asks for more freedom for landlords in the production and usage of electricity from renewable sources in buildings. Moreover, GdW proposes to couple climate protection to a key indicator in the building sector and to aim for a "nearly-zero-greenhouse gas-building". At the same time, simple instruments should be developed that take into consideration the whole life cycle.

With all the requirements and impact assessments it is essential for affordable housing to take into account the gross-rent (including operating costs).

In the following, GdW will make suggestions for modifications including explanations / justifications. The changes are marked in grey and the deletions or additions in bold.

**Proposed Amendment**  
**Article 9a Metering, sub-metering and cost allocation for heating and cooling and domestic hot water**  
**Paragraph 2 last section**

In new buildings of the kind referred to in the first sub-paragraph or when such a building undergoes major renovations, as set out in Directive 2010/31/EU, individual meters **or individual heat cost allocators** shall always be provided, **if technically feasible and cost efficient**.

**Justification**

Individual heat meters cannot achieve further savings compared to standard equipment (heating cost allocator) in Germany. The use of individual meters, however, to measure heat or cooling consumption increases measuring costs by 50 % compared to the use of a heat cost allocator.<sup>1</sup>

Especially in low-energy buildings the heating costs are so small, that the measuring costs would reach the same level of cost.<sup>2</sup>

The installation of individual meters would technically be unproblematic, if the existing distribution system would make the measurement of a heat consumption per housing unit possible. In most existing buildings, however, the heating system in place is connected to an ascending pipe (i.e. all the radiators which lie above each other are connected to the same ascending pipe). For technical reasons, individual meters cannot be installed. Changing the system in order to allow "better" metering would be absurd.

The heating costs that the user can influence, decrease with an increasing heat protection.<sup>3</sup>

Heat flow then takes place between the apartments instead of going outside. In the case of individual billing, this leads to "Wärmeklau (stealing of heat)" that is, turning off radiators in order to benefit from the heat flow from "well-heating" neighbours.

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<sup>1</sup> Institut für Technische Gebäudeausrüstung Dresden Forschung und Anwendung GmbH: Wirtschaftlichkeit von Systemen zur Erfassung und Abrechnung des Wärmeverbrauchs, 2014, S. 57. Siehe <http://www.bbsr.bund.de/BBSR/DE/FP/ZB/Auftragsforschung/5EnergieKlima/Bauen/2014/WirtschaftlichkeitWaermeverbrauch/Endbericht.html>

<sup>2</sup> Beim aktuellen Standard EnEV 2016 schätzt das o.g. Gutachten das Einsparpotenzial durch verbrauchsabhängige Abrechnung auf 20 kWh/m<sup>2</sup>a – bei einem Energiepreis von 8 ct/kWh und 60 m<sup>2</sup> Wohnfläche sind das 96 EUR pro Jahr. Die Kosten der verbrauchsabhängigen Abrechnung werden mit 70 bis 90 EUR pro Jahr angegeben, je nach Gebäudegröße.

<sup>3</sup> Institut für Technische Gebäudeausrüstung Dresden Forschung und Anwendung GmbH (Auftragnehmer): Überarbeitung der Technischen Regeln zur Novelle der Heizkostenverordnung. Endbericht. BBSR-Online-Publikation, Nr. 04/2009

**Proposed Amendment**  
**Article 9a Metering, sub-metering and cost allocation for heating and cooling and domestic hot water**  
**Paragraph 4**

4. For the purposes of this Article, as of 1 January ~~2020~~ **2021** meters and cost allocators installed shall be remotely readable devices, **unless it is technically not useful, as in the case of single pipe heating systems.**

Meters and cost allocators that have already been installed but which are not remotely readable shall be provided with this capability or be replaced with remotely readable devices by 1 January 2027, except where the Member State in question shows that this is not cost-efficient.

**Justification**

In the German housing stock 40 % of the heat distributors are single-pipe heating systems. In the case of single-pipe heating systems a considerable amount of heat is given off through the pipes. For the billing of heating costs, the use of heat cost allocators in accordance to the evaporation principle is recommended in Germany. They represent the consumption behavior better than electronic heat cost allocators.

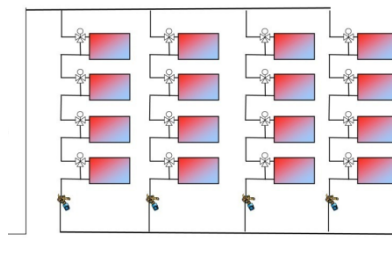


Fig.: System of a vertical single-pipe heating system.

Moreover, it is recommended to extend the deadline until 2021.

**Proposed Amendment**  
**Article 11a Cost of access to metering and billing information for heating and cooling**  
**Paragraph 2**

2. Notwithstanding paragraph 1, the distribution of costs of billing information for the individual consumption of heating, cooling and hot water in multi-apartment buildings pursuant to Article 9a (2) shall be carried out on a non-profit basis. Costs resulting from the assignment of this task to a third party, such as a service provider or the local energy supplier, covering the measuring, allocation and accounting for actual individual consumption in such buildings, may be passed onto the final users to the extent that such costs are reasonable.

## Justification

No proposed amendment for the English version. In the English version no changes were made to the content. In the German version the existing translation should be kept in order to avoid misunderstandings:

2. Ungeachtet des Absatzes 1 werden **im Rahmen der Abrechnungsinformation die tatsächlich angefallenen Aufwendungen für die Aufteilung der Kosten über den individuellen Verbrauch von Wärme und Kälte** ~~Kosten von Abrechnungsinformation über den individuellen Verbrauch von Wärme, Kälte und Warmwasser~~ in Gebäuden mit mehreren Wohnungen oder in Mehrzweckgebäuden gemäß Artikel 9a Absatz 2 **umlegbar auf nichtkommerzieller Grundlage aufgeteilt**. ~~Kosten, die durch die Übertragung dieser Aufgabe auf einen Dritten – etwa einen Dienstleister oder den örtlichen Energieversorger – entstehen und die die Messung, die Zurechnung und die Abrechnung des tatsächlichen individuellen Verbrauchs in diesen Gebäuden betreffen, können auf die Endnutzer umgelegt werden, soweit diese Kosten der Höhe nach angemessen sind.“~~

## Proposed Amendment

### **Article 10a Billing and consumption information for heating and cooling and domestic hot water Paragraph 1 in connection with Annex VIIa, number 2**

1. Member States shall ensure that billing and consumption information is accurate and based on actual consumption, in accordance with points 1 and 2 of Annex VIIa for all final users where meters or cost allocators are installed.

Annex VIIa number 2.

As of 1 January 2022, where remotely readable meters or cost allocators have been installed, billing or consumption information shall be made available at least monthly, **if cost efficient. The Member States decide upon the scope.** Heating and cooling may be exempted from this outside the heating/cooling seasons.

## Justification

Consumption information should alert consumers regarding their energy consumption. The aim is that the consumers change their behavior and thus save energy.

Research studies in Germany have shown that the results of monthly consumption information vary – from either no energy savings to up to over 15 %. This depends, among others, on how energy-saving consumers already are. For many consumers compulsory consumption information would thus lead to additional costs. Moreover, the instrument should prove itself on the market first and

not be imposed by the state as a business model. The decision to introduce regular consumption information should therefore be made dependent of the cost-benefit ration in each Member State.

For a successful implementation of EED in the German housing industry we ask for considering our amendments.



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