



15.3.2024

NOTICE TO MEMBERS

Subject: Petition No 0981/2023 by U. S. (German) on the mandatory notification of energy consumption

1. Summary of petition

In the petitioner's opinion, the requirements of the revised Directive on energy efficiency (2023/1791) for mandatory monthly notification of heating costs are useless, inefficient, bureaucratic and costly. The directive requires that from 1 January 2022, where remotely readable meters or heat cost allocators have been installed, billing or consumption information based on actual consumption or heat cost allocator readings shall be provided to final users at least on a monthly basis. The petitioner states that he is able to read his heat cost meter himself and criticises the bureaucratic effort that he is charged by the property management company. Both the property management company and the tenants' association have rejected his request to be exempt from the notifications, as this is not possible under the current regulations. The petitioner demands the cancellation of the regulation or the creation of the possibility for a tenant to object to the sending of the notification.

2. Admissibility

Declared admissible on 12 January 2024. Information requested from Commission under Rule 227(6).

3. Commission reply, received on 15 March 2024

In the petitioner's opinion, the requirements of Directive (EU) 2018/2002 on energy efficiency, which were not modified with the adoption of Directive (EU) 2023/1791 on energy efficiency (recast), for mandatory monthly notification of heating costs, are useless, inefficient, bureaucratic and costly. The directive requires that from 1 January 2022, where remotely readable meters or heat cost allocators have been installed, billing or consumption information based on actual consumption or heat cost allocator readings shall be provided to

final users at least on a monthly basis. The petitioner states that he is able to read his heat cost meter himself and criticises the bureaucratic effort that he is charged by the property management company. Both the property management company and the tenants' association have rejected his request to be exempt from the notifications, as this is not possible under the current regulations. The petitioner demands the cancellation of the regulation or the creation of the possibility for a tenant to object to the sending of the notification.

Conclusion

To unlock energy savings potentials in heating and cooling it is necessary to provide for frequent and improved feedback on actual energy consumption. To guarantee cost effectiveness, the provision to install remotely readable individual meters or heat cost allocators is only required where technically feasible and cost effective in terms of being proportionate in relation to the potential energy savings. The monthly information required is going beyond the information the individual meter is providing but is necessary to enable the final energy user to assess and compare their energy consumption and consider energy savings potentials. According to the European legislation the effort can be kept at a minimum, because the monthly required billing or consumption information may be made available via the internet. The European legislation allows Member States flexibility in the implementation of these provisions, and it is up to the Member States to decide how to apply them. The problem explained by the petitioner relates to the monthly energy consumption information, and it is linked to the way the Directive has been transposed and implemented in Germany. The issue, therefore, does not stem from the EU legislation and should therefore be resolved by national regulation.