



Smart Energy Demand Coalition SEDC,
Rue d'Arlon 69-71,
1040 Brussels, Belgium

3rd October 2017

Dear Member of the ITRE Committee,

Re: Energy Performance of Buildings Directive vote

The revised EPBD offers a unique opportunity to unlock the flexibility of buildings, to use them as a **source of demand response for the overall electricity system** and grid, and to boost **innovation, investment and competition** in European industry. As the business association for demand-side flexibility in Europe we call on you to vote in favour of a strong EPBD next week.

The SEDC welcomes strengthened provisions under the rapporteurship of Bendt Bendtsen MEP on:

- The smartness indicator, which would give a **recognisable and marketable identification of the available demand flexibility of a building**. As work develops on the indicator, the Parliament should send a clear signal on the need to keep the indicator simple for consumers, and focus on how much of a building's load can be shifted, and delivered to the grid.
- Building automation and control systems requirements for large non-residential buildings which **ensure that demand response can take place seamlessly and without inconvenience to consumers and building owners**. These technologies are therefore highly cost-effective, with an **average payback time of 1 to 2 years**¹. Furthermore, unlike the measures to improve the energy efficiency of a building's fabric, deployment can be rapid and does not require major, inconvenient disruption of occupants, as it is a question of upgrades to systems that **already exist**.
- Charging infrastructure for electric vehicles, in order to facilitate their market uptake, while avoiding technological lock-ins. Ambition **could have been higher**, however we support provisions on ducting infrastructure and visibility of at least one charging point.
- **Innovative financing options** including investment platforms, lower weighting in capital requirements, accessible tools for consumers, and reference to the Smart Finance for Smart Buildings Initiative.

Please support a strong boost for European industry and unlock the flexibility potential of Europe's building stock.

Yours sincerely,

Frauke Thies, Executive Director

¹ Joule Assets Inc. provides investments in the sector and regularly sees payback times of 3-6 months for building control systems