



Mr Jean-Claude Juncker
President
European Commission
Rue de la Loi 200
BE-1049 Brussels
BELGIUM

29 November 2016

Dear President,

This week, the college of the European Commission should adopt the winter energy package. It is an important milestone to shaping the next generation of EU energy and climate policy.

A number of proposals under consideration seem to go in the right direction to making policy fit better with new market realities and long term objectives. In particular, it is more flexible generation and consumption patterns.

However, we see a high risk of failure with the 2030 energy efficiency target.

The question is not about being pro or against energy efficiency. I do not know a single company not being systematically attentive to its energy consumption. In the global and highly competitive economy in which they operate that would make no-sense. The question is how to put in place a coherent policy framework, which avoids overlapping among EU legal instruments.

Going beyond an indicative 27% energy efficiency target endangers the attempt to strengthen the EU ETS system as the flagship of the EU's decarbonisation efforts. According to the Commission's own analysis, a target higher than 27% would push the carbon price down. It is time for the European Commission to clearly assume an ETS-based energy and climate policy and stops weakening it with its own parallel measures.

It is also questionable whether going beyond an indicative 27% energy efficiency target represents a cost-efficient path and a realistic approach in terms of investments. Comparing energy investments of the last decade with forecasts of the Commission with a higher target implies an increase in investments for the coming period by more than 400%. While we are strong advocate of more investments in the EU, we are also advocate of policies that are cost-efficient and based on realistic scenarios.

It is indisputable that the EU must continue to make its economy more energy efficient. We call on the European Commission to do it in a coherent way. Rather than moving beyond an indicative 27% energy efficiency target, more focused measures where the highest potential is, e.g. thermal renovation and technological up scaling of the existing building stock, should play a decisive role.

Yours sincerely,



Emma Marcegaglia