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The Polish Electricity Association's position on the recast of the Directive 2010/31/EU on the energy performance of buildings

Providing adequate requirements for buildings is essential to meet climate goals and to reduce the EU's dependency on fossil fuels imports. However, the Polish Electricity Association (PKEE) wishes to draw attention to the provisions on efficient district heating systems presented in the proposal for a recast of the Energy Performance of Buildings Directive (EPBD) as well as to some inconsistencies with other documents of the "Fit for 55" package.

The PKEE has noticed serious inconsistencies in the detailed provisions:

- Firstly, the EPBD must be coherent with the recast of the Energy Efficiency Directive (EED) and with the new definition of an efficient district heating and cooling system. It should be noted that the EED recast provides a schedule for tightening the requirements for efficient district heating and cooling systems. According to the above, the use of heat from high-efficiency gas cogeneration could provide the basis for meeting the criterion of efficient district heating systems. Yet, the revision of the EPBD according to the proposed criteria would significantly limit the connection of new users to these systems after 2030, as a result blocking the development of efficient district heating. In principle, the EPBD cannot exceed the requirements set out in the EED recast in terms of both energy sources and timing. Therefore, the PKEE encourages enabling connecting new buildings to all efficient district heating systems, not only those based on renewable energy and waste heat. Otherwise, a risk of degradation of district heating based on natural gas high-efficiency combined heat and power emerges, while this technology is important in terms of heat supply and to the national power system in Poland.
- Secondly, it is not clear whether prohibiting the financial support to boilers using fossil fuels applies only to individual boilers or also to heat sources in district heating systems. A process of phasing out fossil fuels in district heating should be carried out carefully, taking into account the technical, social and economic possibilities as well as local conditions. In the opinion of PKEE, it should be possible to finance heat sources using natural gas in heating systems due to the high efficiency of combined generation and lower greenhouse gas emissions. We wish to strongly underline that a complete phase-out of fossil fuels (including natural gas) from heating by 2040 at the latest (as it was proposed by the Commission in the EPBD recast) will not be possible in case of Poland. The PKEE believes that any restrictions on



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financial support for the purchases of heat sources should primarily apply to other fossil fuels such as coal and oil.

- Moreover, the EPBD proposes that the total annual primary energy consumption should be covered by, among others, energy from RES produced on-site. This eliminates electricity from national electricity grids, and the exceptions provided for in the EPBD proposal are significantly restrictive. In the opinion of the PKEE, supplying a building's primary energy demand with electricity from electricity grids, which are not dedicated ones, should be allowed as meeting the definition of a zero-emission building.

Furthermore, the PKEE believes that the role of the distribution system operators (DSOs) cannot be marginalised with regard to the sustainable mobility infrastructure (in and adjacent to buildings) as well as with regard to the smart readiness indicator, due to the fact that it involves the need for additional investments in the distribution grid infrastructure and also in relation to the possibility of using flexibility services by DSOs. DSOs should have the right to verify the availability of grid capacity in a given location.