



Energy Evaluation Europe Conference 2025

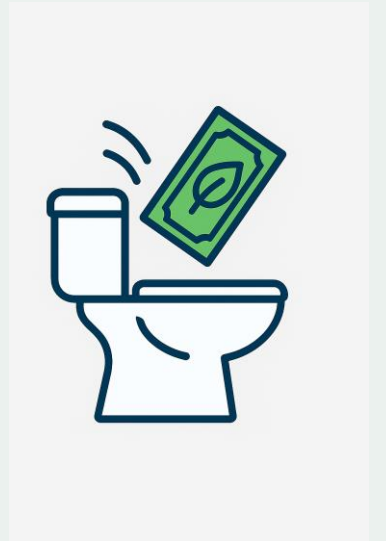
ENHANCING THE IMPACT OF EU ENERGY SAVING OBLIGATIONS THROUGH INDEPENDENT EM&V

SEPTEMBER 25, 2025

Amandine Gal, Lead Evaluation and Principal Advisor



Do you know where your public funds for energy efficiency are going?



Recent lessons from Europe

- France: Reported savings under the Energy Efficiency Certificate scheme were overstated by $\geq 30\%$ (2022–2023).
- Germany: Despite €18 billion/year in subsidies, energy renovation initiatives failed to deliver expected savings.



ECONOLER

Evaluation Requirements for Obligations Schemes Under the EED

MSs must establish robust systems for EM&V of reported energy savings

Savings must be calculated using standardised, transparent methods defined by the EED, including demonstration of additionality, proper baselines, and measure lifetimes

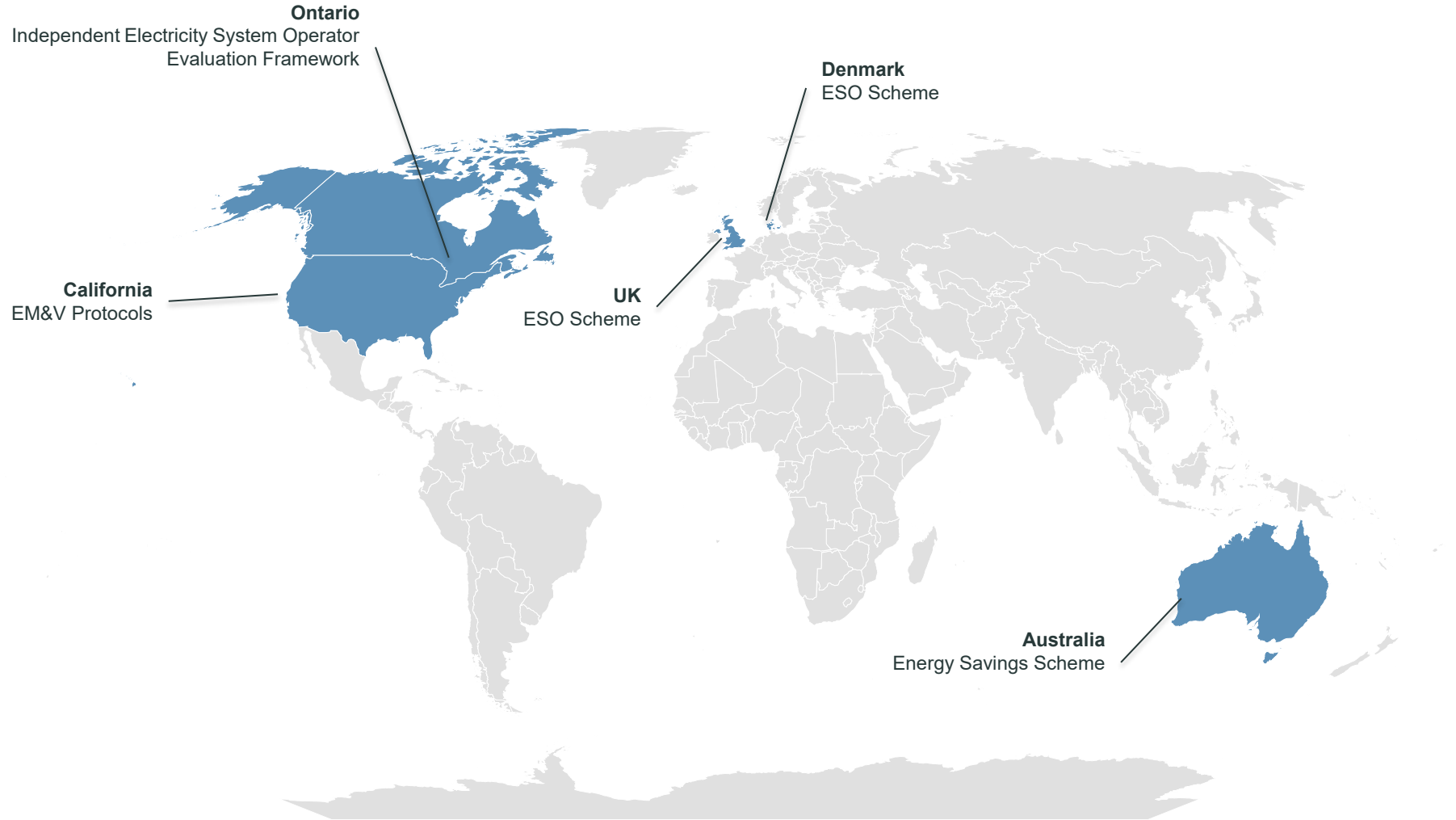
EM&V activities are conducted by designated competent authorities or accredited experts, independent from those responsible for delivering savings (obligated parties)

All data and results from EM&V must be periodically reported to both national authorities and the European Commission, with the possibility of public disclosure in some cases

These are a first step, but not good enough

How could EED evaluation requirements be improved?

Schemes and frameworks researched



Transversal EM&V guidelines were also researched, including the International Performance Measurement and Verification Protocol (IPMVP) and The Uniform Methods Project (UMP).

Evaluation best practices, how the EED aligns with them? and recommended improvements

Identified EM&V Best Practice	EED Alignment with Best Practice	Recommendations
Independent third-party evaluation	Independence required, but tender to third-party evaluator is not mandated; independence achieved via designation/accreditation	Mandate independent evaluations of savings through tender process for third-party evaluator.
Use of harmonized protocols and standardized methods	Harmonization of core principles (Annex V) but not full protocols; Member States use varying detailed methodologies.	Use harmonised EM&V protocols across Member States to improve consistency and credibility.
Dedicated budget for EM&V activities	No required minimum budget allocation; EM&V funding not guaranteed and often insufficient.	Dedicate a portion of ESOs and EE programme budgets (e.g. 3%-5%) to evaluation activities on annual basis.

Evaluation best practices, how the EED aligns with them? and recommended improvements

Identified EM&V Best Practice	EED Alignment with Best Practice	Recommendations
Regular impact, process, and market evaluation cycles	Regular verification and reporting required, but no explicit frequency or cycle for process/market evaluation.	Dedicate budget and set regular cycles for impact, process, and market evaluation.
Transparency and publication of evaluation findings	Reporting to authorities mandatory, but public disclosure/publishing of all findings not required in all cases.	Ensure transparency by publishing evaluation findings .
Measurement and demonstration of additionality (above baseline or business-as-usual)	Explicitly required for claimed savings, but methodologies and stringency vary in implementation across Member States.	Require measurement of additionality and tighten requirements for standardization and documentation.
Active use of evaluation recommendations to improve programmes	No mandated requirement for ESO administrators to act on evaluation recommendations; improvement is encouraged but not enforced.	Require ESO administrators to act on evaluation recommendations and close feedback loops after evaluations.

Recommendations need to be implemented together to be effective

Mandate independent evaluations of savings through tender process for third-party evaluator.

Use harmonised EM&V protocols across Member States to improve consistency and credibility.

Dedicate a portion of ESOs and EE programme budgets (e.g. 3%-5%) to evaluation activities on annual basis.

Dedicate budget and set regular cycles for impact, process, and market evaluation.

Ensure transparency by publishing evaluation findings.

Require measurement of additionality and tighten requirements for standardization and documentation.

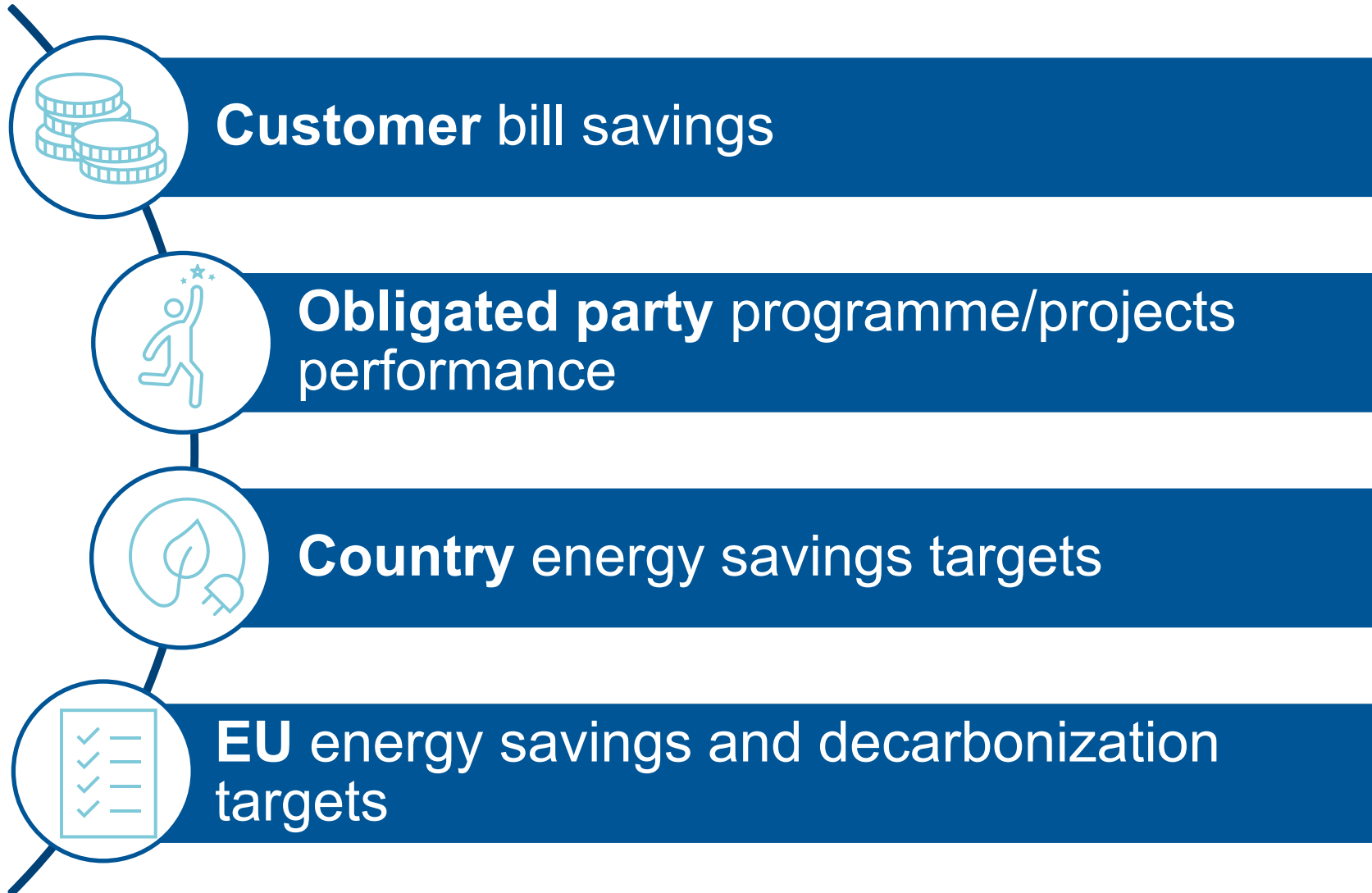
Require ESO administrators to act on evaluation recommendations and close feedback loops after evaluations.

The Path to Success



ECONOLER

Robust EM&V benefits all stakeholders





QUESTIONS?

Ready to start? Contact us!

Amandine Gal
agal@econoler.com

Peter Lemoine
plemoine@econoler.com

www.econoler.com

