

# Consultation on the establishment of a smart readiness indicator for buildings

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Eurelectric response

Eurelectric represents the interests of the electricity industry in Europe. Our work covers all major issues affecting our sector. Our members represent the electricity industry in over 30 European countries.

We cover the entire industry from electricity generation and markets to distribution networks and customer issues. We also have affiliates active on several other continents and business associates from a wide variety of sectors with a direct interest in the electricity industry.

### We stand for

The vision of the European power sector is to enable and sustain:

- A vibrant competitive European economy, reliably powered by clean, carbon-neutral energy
- A smart, energy efficient and truly sustainable society for all citizens of Europe

We are committed to lead a cost-effective energy transition by:

**investing** in clean power generation and transition-enabling solutions, to reduce emissions and actively pursue efforts to become carbon-neutral well before mid-century, taking into account different starting points and commercial availability of key transition technologies;

**transforming** the energy system to make it more responsive, resilient and efficient. This includes increased use of renewable energy, digitalisation, demand side response and reinforcement of grids so they can function as platforms and enablers for customers, cities and communities;

**accelerating** the energy transition in other economic sectors by offering competitive electricity as a transformation tool for transport, heating and industry;

**embedding** sustainability in all parts of our value chain and take measures to support the transformation of existing assets towards a zero carbon society;

**innovating** to discover the cutting-edge business models and develop the breakthrough technologies that are indispensable to allow our industry to lead this transition.

Dépôt légal: D/2019/12.105/32

# Consultation on the establishment of a smart readiness indicator for buildings

Fields marked with \* are mandatory.

## PART 1: General information about the respondent

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### Questionnaire supporting the development of the Smart Readiness Indicator in accordance with the provisions of the Energy Performance in Buildings Directive.

For more information on the use and collection of personal data, please read through the [privacy statement](#).

- \* 1. Please provide your name and surname (Note that submissions that are sent anonymously will not be taken into consideration):

Natalia Plaskiewicz

- \* 2. Please provide your email address in case we need to follow up with you about your reply:

nplaskiewicz@eurelectric.org

3. Please provide your telephone number in case we need to follow up with you about your reply:

- \* 4. Please select your country of residence:

- Austria
- Belgium
- Bulgaria
- Croatia
- Cyprus
- Czechia
- Denmark
- Estonia
- Finland
- France
- Germany
- Greece

- Hungary
- Ireland
- Italy
- Latvia
- Lithuania
- Luxembourg
- Malta
- Netherlands
- Poland
- Portugal
- Romania
- Slovak Republic
- Slovenia
- Spain
- Sweden
- United Kingdom
- Non EU

\* 5. Please indicate whether you are replying as/on behalf of:

- A citizen/consumer
- A local public authority
- A regional public authority
- A national public authority
- An international public authority
- A standardisation organisation
- A non-governmental organisation representing societal interests (for example, environmental or consumer interests)
- A company or a business organisation
- Other

\* Please briefly describe the authority/company/organisation and main field of activity:

Union of the Electricity Industry

\* Please provide the name of your authority/company/organisation:

Eurelectric

\* Please indicate the size of your authority/company/organisation

- self-employed
- micro (1-9 employees)
- small (10-49 employees)
- medium-sized (50-249 employees)
- large (250 employees or more)
- Not applicable

\* Which of the following activities are performed or represented by your authority/company/organisation:

*at least 1 choice(s)*

- Property owner
- Facility management
- Property development
- Architecture
- Engineering
- Construction
- Manufacturer / supplier of construction products
- Manufacturer / supplier of technical building systems
- Energy supplier
- Energy service company and aggregators
- Grid operator
- Supplier of energy management solutions
- Supplier of ICT solutions
- Other
- Not applicable

\* In which country is your authority/company/organisation most active?

*at least 1 choice(s)*

- Austria
- Belgium
- Bulgaria
- Croatia
- Cyprus
- Czechia
- Denmark
- Estonia
- Finland
- France
- Germany
- Greece
- Hungary
- Ireland
- Italy
- Latvia
- Lithuania
- Luxembourg
- Malta
- Netherlands
- Poland
- Portugal
- Romania
- Slovak Republic
- Slovenia

- Spain
- Sweden
- United Kingdom
- Other
- Not applicable

\* Is your authority/company/organisation registered with the EU Transparency Register? If not, you may do so [here](#). However, please note that registration is not compulsory to complete this questionnaire.

- Yes
- No
- Not applicable

If you answered yes, please provide the registration number:

4271427696-87

\* 6. Do you consent to the Commission publishing your replies?

*Note that, whatever the option chosen, your answers may be subject to a request for public access to documents under Regulation (EC) N°1049/2001.*

Note: respondents who select the option "only anonymously" should not include personal data in documents submitted in the context of the consultation.

- Yes** (*I consent to the publication of all information in my contribution in whole or in part, including my name or my organisation's name, and I declare that nothing within my response is unlawful or would infringe the rights of any third party in a manner that would prevent publication*)
- Only anonymously** (*I consent to the publication of any information in my contribution in whole or in part (which may include quotes or opinions I express) provided that I remain anonymous. I declare that nothing within my response is unlawful or would infringe the rights of any third party in a manner that would prevent publication*)

## PART 2: Questions about the audience and scope of the SRI

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7. Who should be the audience(s) for the SRI? (If more than one, list them in order of priority)

Please enter your response below against the options provided. For each row, you can select a number from 1 to 11, with 1 being the most important and 11 the least important. Please note that you can rank as many options as you want, but each number can be selected only once. If you select "Other", please state your preference in the follow-up question.

*at most 11 answered row(s)*

	1	2	3	4	5	6	7	8	9	10	11
Building occupants	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>							
Building visitors	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Property owners	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Facility managers	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Property developers	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Architecture, construction and engineering companies	<input type="radio"/>										
Energy service companies and aggregators	<input type="radio"/>										
Energy utilities	<input type="radio"/>										
Grid operators	<input type="radio"/>										
Authorities	<input type="radio"/>										
Other	<input type="radio"/>										

8. To which categories of buildings should the SRI be applicable? (multiple answers are permitted)

- All categories of buildings
- Non-residential buildings
- Collective residential buildings
- Individual houses
- Large buildings (e.g. above 1000 m2 surface area)
- Other

9. Should the SRI be applicable to new buildings, existing buildings, or both?

- New buildings
- Existing buildings
- Both new and existing buildings

Please explain if you wish your answer in the box below:

*500 character(s) maximum*

The SRI should be applicable to both new and existing buildings. Statistics provided by the EC show an aging curve of the residential buildings stock, half of which was built before 1970. This indicates the need for renovation especially to increase the efficiency of the old buildings. For new buildings SRI should be a norm, but applying it to new buildings would limit its impact.

10. Should it be possible to adapt the scope and calculation methodology of the SRI depending on specific conditions, e.g. the type of building or climatic conditions?

Please note that SRI calculation framework is not yet developed: the aim of this question is to assess what update period would in principle be most adequate.

- Yes
- No

If you answered “Yes”, please state your preference on specific conditions that should be considered in the box below. In addition, if you wish to explain your answer please add an explanation in the box below.

*500 character(s) maximum*

The SRI scope and methodology should be adapted to specific conditions, a “one-size-fits-all” approach should be avoided. Different geographical regions have different energy-related challenges, hence different smart solutions are required. For example heat/cold storage needs, depending on specific regional and weather conditions should be taken into account.

11. What should be the update period of the SRI calculation framework (in particular in relation to technological progress)?

Please note that SRI calculation framework is not yet developed: the aim of this question is to assess what update period would in principle be most adequate.

Please select one of the choices indicated below:

- 1 to 3 years
- 3 years
- 5 years
- More than 5 years
- Other

### Part 3: Questions on communication of the SRI

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12. Do you think that other aspects of buildings (e.g. energy performance or broader life cycle aspects) should be expressed conjointly with the SRI?

Please select one of the choices indicated below:

- Yes
- No

If you answered “Yes”, please state your preference on which other aspects should be expressed in the box below. In addition, if you wish to explain your answer please add an explanation in the box below.

Energy performance, and the Energy Performance Certificates (EPCs), should go hand in hand with the SRI – and complement each other. They can both increase energy efficiency while raising awareness among building owners, tenants, investors, and other relevant stakeholders. Combining the SRI with EPCs would decrease the administrative burden for building owners and also facilitate a faster roll-out of the SRI.

13. Do you think that, where relevant, smart ready accessibility\* services should be communicated jointly with the SRI? Please select one of the choices indicated below:

- Yes
- No

\*For persons with disabilities

Please elaborate on your answer in the box below, if you wish.

*500 character(s) maximum*

The SRI should be inclusive to all citizens, also towards people with disabilities.

14. Should the SRI of a building be presented as an overall smartness score, or sub-scores for each of the three key SRI functionalities highlighted in the EPBD\*, or sub-scores by specific technical domains \*\*, or sub-scores by specific impacts \*\*\*, or all of these?

- An overall smartness score for the whole building
- Smartness scores along the three key SRI functionalities
- Smartness scores per technical building system or technical domain
- Smartness scores per impact criterion
- Other smartness scores

\*\*(a) the ability to maintain energy performance and operation of the building through the adaptation of energy consumption for example through use of energy from renewable sources; (b) the ability to adapt its operation mode in response to the needs of the occupant while paying due attention to the availability of user-friendliness, maintaining healthy indoor climate conditions and the ability to report on energy use; and (c) the flexibility of a building's overall electricity demand, including its ability to enable participation in active and passive as well as implicit and explicit demand response, in relation to the grid, for example through flexibility and load shifting capacities."

\*\* The following domains were identified for SRI assessment in the first technical study: heating, cooling, domestic hot water, controlled ventilation, lighting, dynamic building envelope, on site renewable energy generation, demand side management, electric vehicle charging, monitoring and control. Note – there could be changes to these in the course of the development of the SRI.

\*\*\* The following impact criteria were considered for the SRI assessment in the first technical study: energy consumption, flexibility for the grid, self-generation, comfort, convenience, well-being & health, maintenance & fault prediction, information to occupants. Note – there could be changes to these in the course of the development of the SRI.

15. When the SRI is reported to the users should it include recommendations on the options to improve a building's smart readiness?

- Yes
- No

If you wish to explain your answer, e.g. to elaborate on the type of recommendations that could be provided, please add an explanation in the box below.

*500 character(s) maximum*

Providing users with recommendations on improving building's smart readiness could help to educate consumers/building owners about the different SRI components and the added value of each, which could translate into better understanding of SRI services and activating their responsive behavior as market participants, which is one of CEP objective. Recommendations could help set best practices by stakeholders.

16. What presentational format should the SRI have?

Please select one of the choices indicated below:

- Reporting the SRI score(s) as percentages from 0% (no smart readiness) to 100% (maximum currently achievable smart readiness)
- Reporting the SRI score(s) on a mnemonic scale (such as A to G, or 1 to 10 stars, etc.)
- Reporting the SRI score(s) as both percentages (from 0% (no smart readiness) to 100% (maximum currently achievable smart readiness)) and on a mnemonic scale (such as A to G etc.)
- Other

17. What form should the SRI have?

Please select one of the choices indicated below:

- A printed certificate
- Presented electronically (i.e. in an on-line database and/or sent via an email)
- Other

18. Should the SRI be presented in accessible formats for persons with disabilities and older persons?

Please select one of the choices indicated below:

- Yes
- No

If you answered “no”, then please clarify the reasons for your choice below. If you answered "yes", please indicate possible accessible formats below.

*500 character(s) maximum*

All consumers should be able to benefit from the SRI. That's why the format should be presented in a clear and simple way to allow elders and people with disabilities to understand it.

## PART 4: Questions on the implementation of the SRI

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19. Should the SRI operate independently, or should it be combined with existing schemes (e.g. energy performance certificates) or future schemes (e.g. life cycle performance of buildings, with the Level(s) tool)?

- Independently
- In combination

Please elaborate on your answer in the box below, if you wish.

*500 character(s) maximum*

SRI and the Energy Performance Certificates (EPCs) should be combined and complement each other. Such an approach would speed up a roll-out of the SRI and reduce the administrative burden on consumers.

20. Who should be responsible for the implementation of the SRI (multiple answers are permitted)

- Member states
- European Commission
- Private sector
- Other

If you answered “Other”, please state your preference in the box below. In addition, if you wish to explain your answer please add an explanation in the box below.

*500 character(s) maximum*

Member States are tasked with the implementation of the directive, therefore they should also be in charge of implementing and monitoring the SRI, including involvement of local authorities.

21. How should the SRI be assessed?

Please select one of the choices indicated below:

- Independent inspection process
- Self-assessment
- Both self-assessment and independent inspection process
- Other

22. If in the future it becomes possible to assess the smart readiness of a building through remote measurement of the technical building systems, should this option be permitted?

Please select one of the choices indicated below:

- Yes
- No

Please explain if you wish your answer in the box below.

*500 character(s) maximum*

SRI would have the biggest added value if the possibility of a remote measurement is guaranteed. It's important though to ensure security of data, especially personal data, and implementation of measures preventing cyber attacks.

23. Who should pay the costs of the SRI assessment? (Please note that these costs are not yet known; however, the Impact Assessment accompanying the proposal for amending the Energy Performance of Buildings estimated these at a fraction of the costs of an energy performance certificate).

Please indicate which of the options below are appropriate, noting that they are not mutually exclusive, so more than one or all options may be selected:

- Building owners and occupants
- Member States
- Utilities
- Smart services and technology industry
- Other

24. Should other measures be used to support the implementation of the SRI? If so, which?

- Yes
- No

If you answered "Yes" then please indicate which of the measures mentioned below the SRI's operation should be combined with (you may choose as many of the measures mentioned, including the other option, as you wish):

- Incentives
- Mandatory regulation at Member State level
- Integration with existing schemes (e.g. EPC)
- Supporting policies targeting the uptake of specific smart technologies
- Awareness raising and promotional campaigns
- Other

If you answered "Other", please state your preference in the box below. In addition, if you wish to explain your answer please add an explanation in the box below.

*500 character(s) maximum*

To ease a roll-out of the SRI and to guarantee its success a combination of measures should be introduced. Incentives are important for the inclusion of all consumers, especially those of lower income, by defraying costs of the SRI technologies. Collaboration with industry stakeholders should be strengthened in order to maximize the awareness throughout campaigns, and to obtain valid inputs in the consultation phases.

25. How else should the SRI be implemented to overcome barriers to the uptake of beneficial smart technologies?

Please enter your answer in the box below or leave it empty if all your implementation preferences have previously been expressed. Note, you may include an explanation of your answer too.

*500 character(s) maximum*

The implementation phase should have special focus on users' needs. Educational campaigns and easy access to information should be guaranteed. The administrative burden and costs for consumers should be kept as low as possible.

26. What measures, and standards, if appropriate, should be developed and used to support the implementation of the SRI in line with the GDPR, having regard in particular to data protection by design and by default?

Please enter your answer in the box below.

*500 character(s) maximum*

Consumers should be diligently informed about the process of collecting and processing of their data, including information on type of data collected and processed and collectors and processors of those. A trustful relationship can be created by high security levels on system operation/management and transparency in data processing. DPIA template process similar to the one used in smart grid deployment would be a good practice to follow.

## PART 5: Additional opportunity to provide comment

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27. Are there further comments you would like to make on anything that is not covered above? If so, please use the box below.

*2000 character(s) maximum*

SRI can play a role in raising awareness among consumers about smart energy and flexibility technologies, while sending important investment signals to industry. It can help customers become more informed and active in the energy markets, as an objective of Clean Energy Package.

EPC succeeded in raising consumers' awareness about the importance and benefits of energy efficiency in the building stock. SRI can be similarly successful, serving as a tool, together with other instruments, to help users understand the importance of smart-ready and flexible buildings incorporating storage technologies (batteries and thermal) and integrating distributed energy generation. SRI could be seen as a tool to facilitate the path to digitalise the energy system, putting in the hands of EU consumers the means for advanced energy management and the participation in the energy market.

Moreover, energy storage supports the roll-out of electric vehicle charging infrastructure in buildings. Stationary storage co-located with charging infrastructure can reduce peaks in demand and facilitate smart charging in response to signals from the grid.

Interoperability is not adequately addressed in this consultation. Different smart energy technologies must be able to interact with one another, as this will enhance the overall functioning of the building, allow consumers a wide array of choice between different technology providers, and facilitate the installation of various different technologies.

Collaboration with industry is essential to ensure the success of this initiative. Industry players, such as energy storage providers, should be able to share technological developments and performance characteristics of different technologies with those who are defining the SRI and are in charge of the subsequent revisions. In implementing the SRI, collaboration between Member States, regional and local authorities, and industry will be essential to ensure that the SRI is carried out effectively.

## **Contact**

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Eurelectric pursues in all its activities the application of the following sustainable development values:

Economic Development

- Growth, added-value, efficiency

Environmental Leadership

- Commitment, innovation, pro-activeness

Social Responsibility

- Transparency, ethics, accountability



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EU Transparency Register number: [4271427696-87](https://ec.europa.eu/transparency/regexp1/index.cfm?do=entity.entity_details&entity_id=4271427696-87)