



European Biogas Association | Rue d'Arton 63 - 65 | B-1040 Brussels, Belgium

European Commission  
DG Energy  
Mr. Paul Hodson  
Rue J.-A. Demot, 24-28  
B - 1049 Brussels

Name Arthur Wellinger  
Phone +32 2400 1087  
Fax +32 2546 1934  
wellinger@european-biogas.eu

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## Energy Efficiency Directive

Dear Mr. Hodson,

The European Biogas Association (EBA) was founded in February 2009 as a Belgian non-profit organization aiming to promote the deployment of sustainable biogas production and use in Europe. EBA's membership comprises national biogas associations, institutes and companies from over 20 countries all across Europe. The growing membership provides a well-established network and communication platform for exchanging information and expertise.

The European Biogas Association welcomes the energy efficiency directive. It is an important instrument to further develop the leading role of Europe in energy efficiency and energy savings. The draft directive indicates that a significant increase in energy efficiency can be reached by changing conventional heat or power systems into high efficiency combined heat and power (CHP) production units. We fully support this approach, however there is an important obstacle to be corrected.

In comparison to mono heat and power production CHP has a higher efficiency and therefore reduces GHG emissions. The emission reduction can be boosted by using renewable energy as fuel. However large scale CHP of several MW electric powers has major problems to fully use the produced heat. In contrast, small scale CHP units can be installed in predestined locations where the total produced heat and power can be entirely utilized.

In order to allow a smooth and efficient implementation it is crucial to get an affordable grid connection to the power and gas grid. We therefore suggest that small scale CHP units (Article 2 point 23) using renewable energy e.g. biomethane should get free power and gas grid access. The cost should be covered by the grid operator. This important amendment for small scale CHP units could be implemented into Article 12 point 5. This amendment applies to three main goals of EU policy reaching:

- higher energy efficiency,
- energy savings
- an increase of renewable energies

We kindly ask you to take our propositions into consideration.

Kind regards,



Arthur Wellinger  
EBA President