

GREECE

Background	1
EEOS - Energy Efficiency Obligation Scheme	5
Alternative measure - Renovation of residential buildings	10
Alternative measure – Promotion of alternative fuels in road transport.....	14
Interview with Christos Tourkolias (CRES - Member of the work team for monitoring the targets of the NECP)	17
Interview with Minas Iatridis (CRES – Administrator of EEOs).....	18

Background

National context, strategy, key measures and results in 2021

- **General strategy:** Alternative measures + EEOS
- **Baseline annual Final Energy Consumption¹** (averaged over 2016-2018): **16365 ktoe/year** (source: [final NECP update](#), 2024)
- **Cumulative energy savings target for 2021-2030: 11251 ktoe** (source: [final NECP update](#), 2024)
- **Achieved new annual savings (all measures) = 34.55 ktoe/year in 2021** (source: NECPR, 2023), **285.8 ktoe/year in 2022** and **227.7 ktoe/year in 2023** (source: NECPR, 2023)

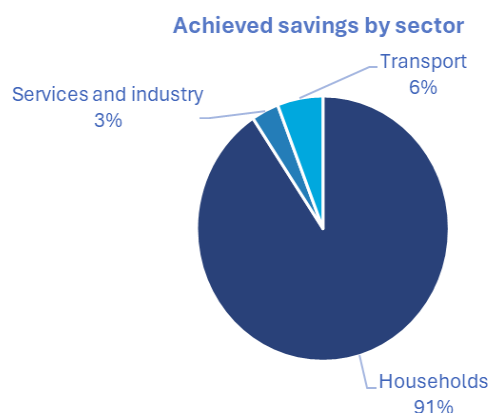
% of new annual savings vs. baseline energy consumption = 0.21% in 2021, 1.4% in 2023

Catching up: After a slow start in 2021, with a 86% reduction of the reported savings in 2021 compared to new annual savings averaged over 2018-2020, Greece has reported higher new savings in 2022 and 2023.

¹ For more details about trends in energy consumption and energy efficiency, see the country profiles by ODYSSEE-MURE: <https://www.odyssee-mure.eu/publications/efficiency-trends-policies-profiles>



- **Distribution of annual savings achieved in 2021**



Source: own graph from data available in NECPR (2023)

- **Policy measures reported with energy savings in 2021**

Name of the measure	Sector	Policy type	% savings in 2021
Financing programmes for the renovation of residential buildings in the context of the new programming period	Households	Economic measure	91%
Strengthening of the role and improvement of the regulatory framework for energy efficiency obligation schemes	Cross-cutting	Regulatory measures	It has not been quantified yet
Use of tax incentives to promote alternative fuels in transport (biofuels, hybrid fuels, electric fuels, natural gas, LPG)	Transport	Economic and regulatory measure	6%

Key points, changes vs. 2014-2020 and other recent developments

No significant changes have been observed in the period 2021-2030 compared to the period 2014-2020 in regards to the policy measures reported to Article 8 of the EED.

The promotion of energy efficiency improvement interventions will be facilitated by the acceleration of the market-based mechanisms. In this direction, the EEOS will continue to play a key role in conjunction with alternative measures in achieving the energy savings target. The allocation of the target among obligated parties will take into account the achievable techno-economic potential of energy savings in the obligated parties' sectors of activity and the mix of alternative measures to be designed. At the same time, the possibility of supporting obligated parties will be explored by developing the institutional framework for the repayment of energy savings investments through energy bills (on-bill financing) and exploiting synergies with alternative measures.

The energy efficiency auctions mechanism will be enabled to promote further the implementation of energy efficiency interventions in the tertiary and industrial sectors with the most cost-effective

approach. Simultaneously, the energy efficiency auctions will manage to exploit economies of scale and mitigate the investment risk for the engaged parties.

Finally, yet importantly, innovative financing scheme(s) will be launched to address the financing barriers of the energy savings investments and further exploit the energy savings potential. To this direction, the role of on-bill financing is essential to mobilize the required investments especially in the building sector.

Focus on energy poverty

- **Energy poverty in Greece:** The number of households affected by the phenomenon of energy poverty amounted to 513 000 or 12.4% in 2021, based on the performance of the I&I_{eq} Index, according to the NECP (2024). It is noted that the number of affected households amounted to 573 000 or 13.8% in 2016, leading to a decrease equal to 10%.

The I&I_{eq} Index was defined as the main indicator for measuring and monitoring the phenomenon of energy poverty in Greece, which calculates the number of households that simultaneously meet the following two conditions:

- Condition I: The annual cost of the total energy consumption of each household should be lower than 80% of its annual cost to cover the minimum required energy consumption.
- Condition II: The net income of each household on an annual basis should be lower than 60% of the median of the corresponding income, based on the equivalent number of persons belonging to each household, according to the OECD scale for all households according to the definition of relative poverty (source: [final NECP update](#), 2024)
- **Energy poverty target (Article 8(3) EED):** The final NECP update does not specify the Art.8(3) target. However, it mentions the objective to reduce energy poverty by 50% in 2025 and 75% in 2030 compared to 2016 (source: [final NECP update](#)).
- **Art.8 policy measures targeting energy poverty:**

Name of the measure	Policy type	New annual savings in 2021 (ktoe/year)	% 'energy poverty' savings in the measure Whose energy savings related to tackling energy poverty in 2021 (ktoe/year)
Energy renovation of the residential buildings and promotion of RES systems to satisfy the energy needs of the energy poor households – (Financing programmes for the renovation of residential buildings in the context of the new programming period)	Economic measure	31,34	4,92
Provision of incentives to existing mechanisms to combat energy poverty - EEOs	EEOS		

Exploitation of the Renewable Energy Communities and Citizens Energy Communities to tackle energy poverty	Economic measure
Innovative financing instruments for the implementation of measures in energy poor households	Economic measure
Conduction of information and education programmes to energy poor households - EEOs	Training, education and information
Conduction of targeted information and education actions to energy poor households	Training, education and information
Establishment of One-Stop Shops for the assistance of energy poor households	Training, education and information

Sources: NECPR (2023), final NECP update (2024)

The NECPR 2023 did not include data about energy savings for most of the measures listed above.

EEOS - Energy Efficiency Obligation Scheme

History

Starting year: 2017

Latest revision: The first revision was carried out in June 2022 through the Ministerial Decision for the establishment of the EEOS' operational framework (Government Gazette 2nd Issue 2898 - No. MoEE/DEPEA/57295/426)

Cumulative energy savings reported to Art.7 EED for 2017-2020: 578 ktoe (i.e. 24% of Greece's cumulative savings for 2014-2020)

Current target: 2,698 ktoe (2022-2030) cumulative, equating to about 300 ktoe new annual savings per year according to the NECP (2024).

Expected contribution to 2021-2030 obligation for Art. 8 EED: 24% of Greece's cumulative savings for 2021-2030

Key actors and roles

Public authorities: **Ministry of Environment and Energy (MoEE)** is the competent authority for the coordination and operation of the EEOS, while **CRES** has been appointed as the administrator of the EEOS for calculating, measuring, controlling and verifying the delivered energy savings.

Obligated parties: Electricity, natural gas and petroleum products (i.e. gasoline, diesel, fuel oil and LPG) suppliers/retailers and electricity and natural gas distributors.

Target setting and allocation

Size: The cumulative target of the scheme in the period 2021-2030 has been defined within the framework of the NECP representing 24% of the total country's Art.8 target.

Metric: Final energy savings within the period 2021-2030

Period: The distribution of the defined cumulative target on annual basis is carried out within the context of the Ministerial Decision for the establishment of the EEOS' operational framework.

Scope: Final energy consumption across all end-use sectors

Allocation rules: The assignment of the obligated parties is based on the share of all potential companies for each targeted fuel (i.e. electricity, natural gas, gasoline, diesel, fuel oil and LPG) separately. The companies that contribute to the achievement of a cumulative share up to 95% and simultaneously the share of each company exceeds 1% are selected as obligated parties.

The annual cumulative target is distributed to the obligated parties as a percentage of the sold and/or distributed energy of each obligated party to the total sold and/or distributed energy of all OPs selected.

Sub-target related to energy poverty: No

Eligible actions

Eligible sectors: All sectors

Eligibility criteria: All energy efficiency actions, which lead to final energy savings, are considered eligible. CRES has prepared and published an indicative list of eligible measures. The eligible actions are classified into three different typologies (i.e. technical measures, horizontal awareness raising measures and targeted awareness raising measures). Actions among energy vulnerable households are considered eligible as well. The annual cumulative target may be achieved by implementing measures either by the obligated parties or by third parties.

Possibility to cumulate EEOS with incentives from other schemes: No

Standardised actions or methods: A measurement protocol has been developed by CRES consisting totally of 48 different bottom-up methodologies. 39 deemed savings equations cover 39 residential, commercial/public and transport sector actions. Four equations have been prepared for measured savings methods and three for scaled savings.

Non-standardised actions: A specialised equation can be used for the case of the non-standardised actions based on the energy consumption before and after their implementation.

Other eligible actions or programmes: No

Incentives (including about tackling energy poverty) and restrictions

Uplifts / bonus related to energy poverty or priority group(s): For actions implemented by the obligated parties in energy poor households, the cleared energy savings derived are increased by a factor of 1.4 for technical measures, and 1.1 for targeted awareness raising measures.

Other uplifts / bonus / downgrades: For actions combining RES systems for the production of electricity and energy efficiency interventions, the cleared energy savings are increased by a factor of 1.2. In the case of the implementation of the aforementioned measures in energy poor households, the cleared energy saving units are increased by a factor of 1.5.

Caps / maximum limits: There are maximum thresholds to the energy savings delivered by types of actions. The contribution of the technical measures cannot be less than 30% of the total assigned cumulative target for each obligated party for the whole period. Moreover, the contribution of the horizontal awareness raising measures cannot exceed 25% of the total assigned cumulative target for each obligated party.

Flexibilities

Trading: Bilateral.

The obligated parties can enter into agreements with other obligated parties to transfer the cleared energy savings so as to achieve the assigned cumulative target.

Banking and borrowing: The obligated parties can declare energy savings from measures that have been implemented in one of the three previous years from the reported year, but within the period of the scheme (2021-2030). Moreover, the obligated parties can implement measures four years after the assessment of achieving the minimum contribution of technical measures within the period 2021-2025 in order to avoid the potential increase of the deviation as a penalty.

Buyout price / substitution fee: The buyout is foreseen as an alternative option to achieve the target using different compliance cost for each typology of measures (€568,000 per energy saving unit (ktoe) for technical measures and €30,000 per energy saving unit (ktoe) for horizontal and/or targeted awareness raising measures). It should be noted that none obligated party has decided to select the buy-out option for attaining the imposed energy saving target since the initiation of the scheme in 2017.

Evaluation, Monitoring & Verification

Materiality requirements: The obligated parties should justify their compliance with the *materiality* criterion for each action separately within the framework of the submitted Annual Implementation Declaration.

Additionality requirements: The obligated parties should justify their compliance with the *additionality* criterion for each action separately within the framework of the submitted Annual Implementation Declaration. It should be noted that CRES integrated into the measurement protocol the additionality requirements when feasible/relevant.

Calculation methods: The savings calculation can be performed using deemed savings, scaled savings, or metered savings depending on the complexity of the measure and the availability of data. **Deemed savings** are commonly used for simple measures, while **scaled savings** are applied for more customized projects, and **metered savings** are reserved for situations where actual consumption data is available and necessary for accurate calculations.

The calculation of metered savings is applicable in specific types of measures through specific bottom-up methodologies, such as the energy upgrade of lighting systems in non-residential buildings and street lighting systems, the installation of heat recovery systems in industrial plants and the conduction of ad-hoc measures with actual energy consumption data before and after the improvement of the energy efficiency.

Reporting and validation: The obligated parties must report the implemented energy efficiency actions through the online platform for a reference year until the end of January of the year following the reference year. CRES must fulfil the clearance of the submitted energy saving within a period of two months and prepare the Annual Results Report, which includes information and data on the implemented energy efficiency actions. The Annual Results Report should be submitted to the MoEE within one month of the completion of the clearance (mid- April).

Online platform to report actions: yes

Automatized checks: yes

Progress monitoring: The MoEE should approve the Clearance of the implemented energy efficiency actions and the submitted Annual Results Report. Moreover, a ministerial decision should be issued on an annual basis including the positive or negative deviations from achieving the target for each obligated party according to the outcomes of the Annual Results Report. All the involved parties can also check their current performance towards the attainment of their target through the online platform.

Other verifications and controls: The control and verification mechanism consists of three different steps: a) preliminary control of the submitted information and data for all the

implemented energy efficiency actions, b) determination of the sample for the conduction of more extensive checks and c) conduction of in-depth checks

Data on verification and controls: The obligated parties are responsible for submitting to the online platform all the necessary data about the implementation of the energy efficiency actions so as to be controlled and verified by CRES. It should be noted that the share of the energy savings, which have been cleared after the conduction of in-depth checks was reduced gradually by 94% in 2017 to 28% in 2020 as a result of both the acquired technical familiarity of all the involved bodies and the standardisation of the applied control and verification activities.

Evaluation(s) of the scheme: CRES is responsible for assessing the effectiveness of the scheme and for drafting recommendations to improve it. The recommendations are incorporated on annual basis into the report with the results of the scheme for each reference year, which is compiled and submitted by CRES to MoEE.

Penalties

For missing target: The imposition of penalties is foreseen in cases obligated parties do not manage to achieve their target, as a result of the respective evaluation by CRES after the completion of the scheme (first semester of 2031).

Full discharge: yes

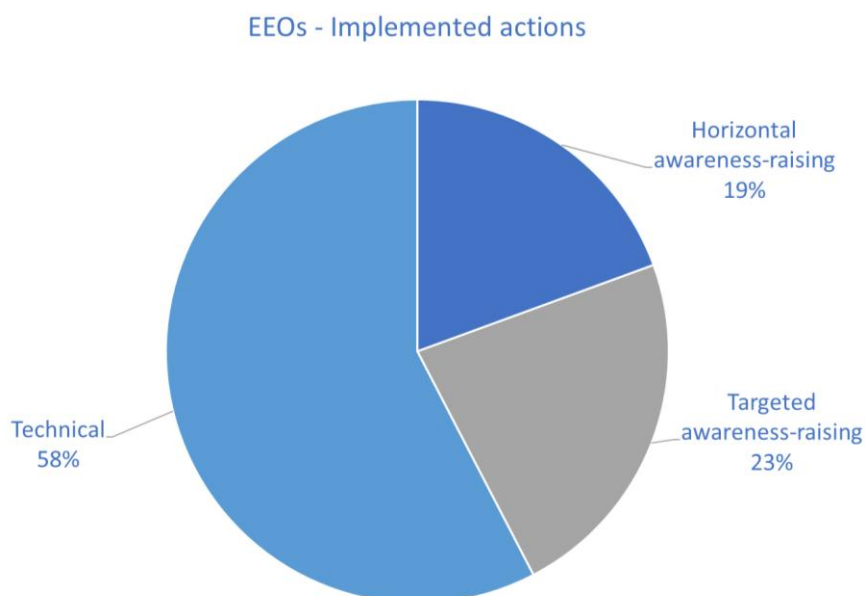
Other penalties or sanctions: CRES should assess the achievement of the obligation the contribution of the technical measures to be no less than 30% of the total assigned cumulative target in the period 2021-2025 in the first semester of 2026. Different options are foreseen (e.g. imposition of a penalty, transfer to be implemented until 2029) according to the estimated deviation.

Data on penalties or sanctions: No

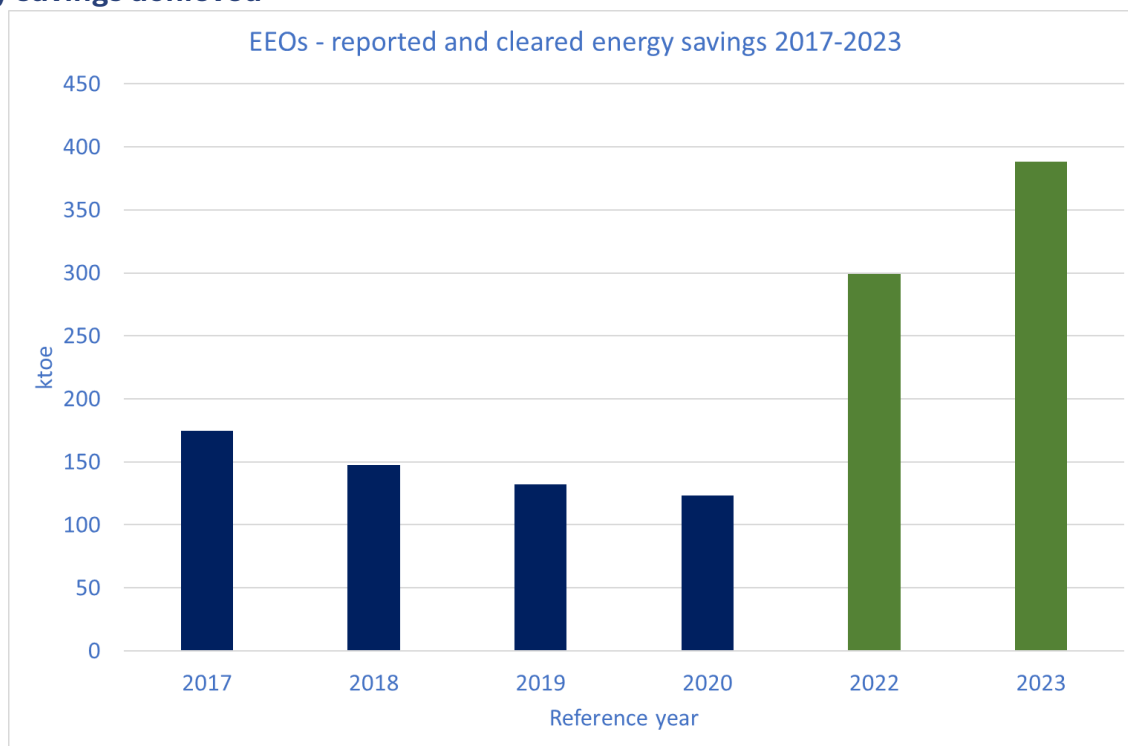
Key results

Most popular actions in EEOS, 2022-2023

(Source: MoEE)



Energy savings achieved



Source: MoEE

Cost effectiveness

The cost-effectiveness of the implemented energy efficiency actions has not been estimated. The workforce of CRES for the provided services as administrator amounts to almost 17 person-months on annual basis.

Sources

Official webpage of the EEOS: <http://www.cres.gr/obs/>

Official on-line platform for submission/ reporting: <https://www.resoffice.gr/klykea/>

Alternative measure - Renovation of residential buildings

History

Starting year: 2014

Current implementing period: 2014-2024

The measure has been implemented through the initiation of different cycles (i.e. “Saving at Home”, “Save Autonomy”, “Exoikonomo” programmes).

Cumulative energy savings reported to Art.7 EED for 2014-2020: 390 ktoe (i.e. 16% of Greece’s cumulative savings for 2014-2020)

Expected contribution to 2021-2030 obligation for Art. 8 EED: 6.154 ktoe (i.e. 55% of Greece’s cumulative savings for 2021-2030)

Design and features

Type of policy measure: Financial incentives **Target sector / group:** Residential sector

Key actors and roles: The **Ministry of Environment and Energy (MoEE)** is the competent authority for the design and coordination of each cycle of the measure. An **Implementation Body** is designated for allying all the foreseen procedures for the implementation of the measure (i.e. control of the submitted documents and data, evaluation and clearance of the applications, control of the provided public aid etc.).

Eligibility criteria: The buildings, which will be renovated, should be legal, not to be demolished, to be used as a main residence and to be classified based on the Energy Performance Certificate in a category lower than or equal to C (before renovation). The eligible energy efficiency interventions are classified into five different categories:

- (a) replacement of window frames and installation of shading systems with new, more energy-efficient ones,
- (b) installation of thermal insulation in the building envelope, including the roof and the pilotis,
- (c) upgrading of the heating and cooling system with a new, more energy-efficient one,
- (d) installation of a system for the production of hot water with the utilization of RES, and
- (e) installation of smart system for the energy management of the system under the precondition that one of the previously mentioned interventions (a-d) will be materialized.

Features: The “Exoikonomo 2023” and “Exoikonomo 2025” programmes foresaw both the provision of interest rate subsidy and capital grant and the coverage of the cost of energy inspections and other “intangible” costs, with resources from the Recovery and Resilience Fund for energy saving interventions in the residential sector. The objective of these programmes was to improve the energy performance of the building by at least three energy categories ensuring that 30% or more primary energy savings will be achieved. The budget of the “Exoikonomo 2023” and “Exoikonomo 2025” programmes amounted to 585.3 and 434 million € respectively. The provided subsidy for the capital grant ranged from 50% to 75% depending on the household’s income for the case of “Exoikonomo 2023” programme. Slightly higher levels of subsidy were provided by

“Exoikonomo 2025” programme (ranging from 50% to 100% for targeted cases, such as households that have been affected by floods and earthquakes in specific areas).

The evaluation procedure of the submitted applications to the “Exoikonomo 2023” programme was performed on the comparative assessment of each application on the basis of predetermined criteria: cost-effectiveness ratio based on the achieved primary energy, income, heating degree days, energy class of the buildings (before renovation), construction age and specific conditions of the households (single-parent families, families with disabled persons and families with more than two dependent children). It should be noted that the heating degree days was used as the only evaluation criterion within the framework of the “Exoikonomo 2025” programme.

Relevance to tackling energy poverty or supporting priority groups

Priority groups defined in the measure: Special emphasis was given on the alleviation of the energy poverty within the context of the “Exoikonomo 2023” and “Exoikonomo 2025” programmes as a predefined share of the available budget that was provided to energy poor households (169 million € and 194 million € respectively).

Moreover, single-parent families, families with disabled persons and families with more than two dependent children were promoted in “Exoikonomo 2023” programme, while predefined budget was foreseen for the case of both households affected in Thessaly floods in Arkalochori and Samos by earthquakes and families with three dependent children and disabled persons in “Exoikonomo 2025” programme.

Provisions specific to the priority groups: Higher grant rates are given to the priority groups, including the energy poor households, compared to the other beneficiaries.

Evaluation, Monitoring & Verification

Materiality provisions: The provision of financial incentives for the promotion of energy efficient interventions based on specific income criteria of the beneficiary households ensures the compliance with the criterion of materiality.

Additionality provisions: The compliance with the criterion of additionality is satisfied due to the fact that the delivered energy savings are triggered by the renovation of existing buildings provided that the materiality criterion is fulfilled according to Annex V, paragraph 2, point c.

Calculation methods: The scaled savings method is used for the quantification of the delivered energy savings. More, specifically, primary energy savings are calculated for each household separately as the difference in the primary energy consumption of the issued Energy Performance Certificates before and after the implementation of the interventions. Then, the primary energy savings are transformed into final energy savings taking into account the utilised fuels, with conversion factors.

Online platform to collect data: Yes

Automatized checks: Yes

Verifications and controls: The Implementation Body is responsible for scrutinizing all the submitted documents and data. Furthermore, the Implementation Body reserves the right to carry out the necessary checks for the verification of compliance with the terms and conditions of the programmes, based on completeness and correctness of all the submitted documents and data through the online platform. The Implementation Body, in order to verify the accuracy of the

indicated information inside the copies of the submitted documents and data, should conduct a random check on at least 5% of the submitted documents and data during the immediately preceding quarter. The Implementation Body may carry out on-site sample checks for the verification of the correct implementation of the energy efficiency interventions both in terms of the physical and economic object of each application. The Energy Inspection Departments of Northern and Southern Greece, which belong to the MoEE, organize and conduct systematic checks in the process of issuing the Energy Performance Certificates, while they have the authorization to carry out random checks, where it is required.

Data on verification and controls: An extensive list of the required documents and data, which must be submitted during the application, is presented within the published guidance of the programmes. The Implementation Body has the right to request the provision of additional data. The Implementation Body is responsible for verifying and controlling all the documents and data that are related to the implemented efficiency interventions both in terms of the physical and economic object of the applications.

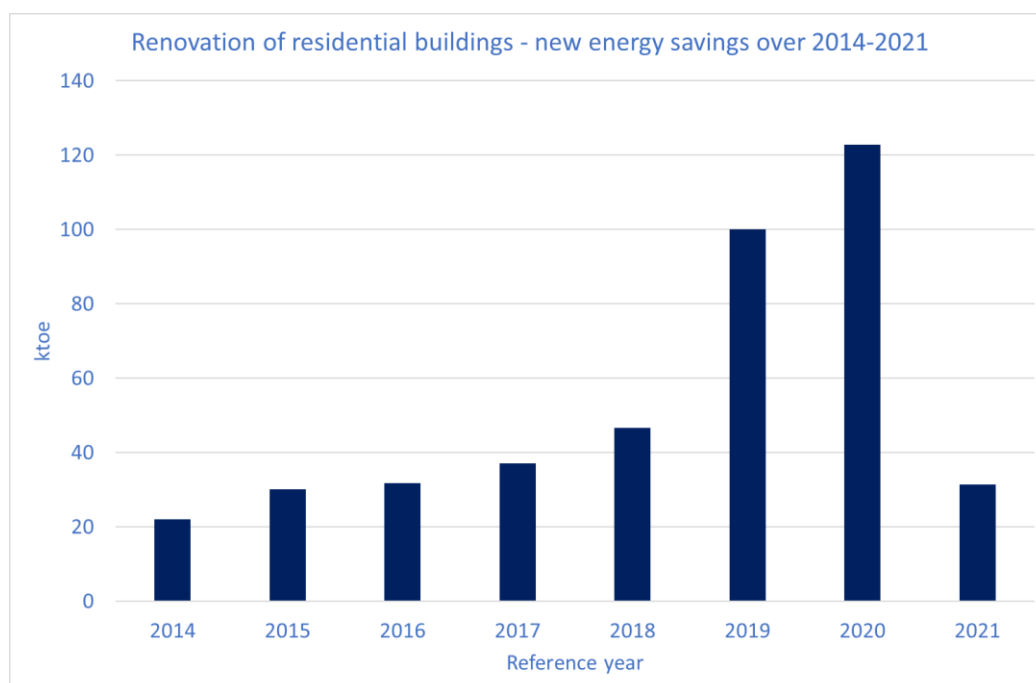
Progress monitoring or reporting: The publication of the achieved energy savings takes place after the completion of each programme, which is aligned with the finalization of the physical and economic objects for all the submitted applications.

Evaluation(s) of the scheme: The competent authority is responsible for assessing the effectiveness and the overall operational performance of each completed programme and for recommending proposals for its improvement.

Key results

Most popular actions: No information is available

Energy savings achieved (Source: MoEE)



Cost effectiveness

The cost-effectiveness of the implemented energy efficiency actions has not been estimated for the different implemented programmes.

Sources

Official webpage of the “Exoikonomo 2023” programme: <https://exoikonomo2023.gov.gr/>

Official webpage of the “Exoikonomo 2025” programme: <https://exoikonomo2025.gov.gr/>

Alternative measure – Promotion of alternative fuels in road transport

History

Starting year: 2021

Current implementing period: 2021-2030

Expected contribution to 2021-2030 obligation for Art. 8 EED: 147 ktoe (i.e. 1% of Greece's cumulative savings for 2021-2030)

Design and features

Type of policy measure: Economic and regulatory measure

Target sector / group: Transport sector (electromobility)

Key actors and roles: The **Ministry of Infrastructure and Transportation** is the competent authority for the promotion of alternative fuels in road transport in close collaboration with the **Ministry of Environment and Energy**. The **Autonomous Department of Electrification**, which belongs to Ministry of Infrastructure and Transportation has been designated as the Implementation Body of the last cycle of the initiated financing programme for the promotion of electromobility.

Eligibility criteria: Priority has been given on the promotion of electromobility in Greece in full alignment with the objectives of the NECP.

Law 4710/2020 has introduced a unified and coherent legislative framework for the acceleration of electromobility. Additional measures are foreseen within the framework of the National Climate Law 4936/2022. Finally, three cycles of the “E-moving” programme have been launched since 2020 aiming at the promotion of different types of electric vehicles along with the required charging infrastructure. It should be noted that the voluntary and subsidized withdrawal of the existing vehicles within the framework of the “E-Move” programme is foreseen.

Features: Law 4710/2020 promotes a combination of measures for the targeted promotion of electromobility, such as the general rules and incentives (i.e. free of charge parking spaces, imposition of an environmental tax), tax incentives related to the purchase, leasing and use of electric vehicles, regulations for the organization and operation of the electromobility market and urban planning regulations for the installation of charging stations and spatial planning regulations for the development of publicly accessible charging stations.

Moreover, Law 4936/2022 has introduced targeted measures for the promotion of zero-emission vehicles, such as the obligation at least a quarter of the new company cars for private use have to be either electric vehicles or hybrid electric vehicles with emissions less than 50 grams of carbon dioxide per kilometer. Finally, the “E-Move” programmes provided subsidy for the purchase of electric vehicles ranging from 30%-40% for the natural persons and 20%-40% for the companies depending on the type of the electric vehicle up to pre-defined maximum amount of subsidy. The



total budget of the “E-Move” programme amounted to 128.8 million € for the three cycles that have been already launched.

Evaluation, Monitoring & Verification

Materiality provisions: The provision of financial and regulatory incentives for the promotion of electromobility ensures the compliance with the criterion of materiality.

Additionality provisions: The provisions of both the Regulation (EC) No 443/2009 and Regulation (EU) No 510/2011 in regards the minimum levels of the emission performance standards for new passenger cars and light commercial vehicles respectively have been incorporated into the deemed method, which is used for the calculation of the delivered energy savings from the implementation of the measure.

Calculation methods: A specialised deemed saving method is utilised within the framework of the measurement protocol, which has been developed by CRES within the EEOS, in order to quantify the delivered energy savings from the replacement of existing vehicles with new more energy efficient (equation BU0016).

Online platform to collect data: Yes

Automatized checks: No

Verifications and controls: The Implementation Body is responsible for conducting the evaluation and control process for the submitted applications in the context of the launched programmes. Each application is reviewed and evaluated based on the first in-first served principle. The Implementation Body checks the completeness and correctness of the submitted application through the online platform, including the required documents and data. Moreover, the control of the provided public aid is performed by the Implementation Body. The competent authorities may verify the submitted documents and data with the respective ones that are kept in the various national databases.

The overall assessment of the measure is carried on annual basis taking into consideration the number of the purchased electric vehicles at national level as provided by the AMVIR (Association of Imported Car Dealers) in order to count the contribution of both the launched programmes and the other legislative and economic initiatives. It should be noted that the cleared final energy savings within the framework of the EEOS are subtracted on annual basis by the estimated energy savings as resulted by the examined measures in order to avoid the double-counting.

Data on verification and controls: An extensive list of the required documents and data, which must be submitted during the application, is presented within the published guidance of the launched programmes. The Implementation Body has the right to request the provision of additional data from the potential beneficiaries.

Progress monitoring or reporting: The publication of the achieved energy savings takes place after the completion of each launched programme, which is aligned with the finalization of the physical and economic object for all the submitted applications.

Evaluation(s) of the scheme: The competent authorities are responsible for assessing the effectiveness and the overall operational performance of both the implemented programmes and

the other legislative and economic initiatives. Finally, targeted proposals are drafted for their improvement.

Key results

Most popular actions

No data are available

Energy savings achieved

The newly achieved energy savings from the implementation of the measure amount to 1.96 ktoe/year and 2.13 ktoe/year in 2021 and 2022 correspondingly.

Cost effectiveness

The cost-effectiveness of the implemented energy efficiency actions has not been estimated for the different implemented programmes.

Sources

Official webpage of the “E-move-2021” programme: <https://kinoumeilektrika.gov.gr/>

Official webpage of the “E-move-2022” programme: <https://kinoumeilektrika2.gov.gr/>

Official webpage of the “E-move-2023” programme: <https://kinoumeilektrika3.gov.gr/>

Interview with Christos Tourkolias (CRES - Member of the work team for monitoring the targets of the NECP)

What is the general approach of Greece to delivering the higher energy savings obligation for 2024-2030?

Obviously, the main objective is to attain the specific targets. Toward this direction, it was decided initially within the revised NECP to increase the contribution of the most cost-effective measures such as the EEOs and the programmes for the renovation of residential buildings. Moreover, a multifaceted approach will be carried out fostering the implementation of additional innovative schemes to increase the leverage of the required investments, such as energy efficiency auctions and an on-bill financing scheme.

What is the approach of Greece to deliver energy savings among target groups, and especially for priority groups (cf. Article 8(3) EED)

The confrontation of energy poverty is considered as a fundamental objective within the revised NECP. The policy measures, which have been incorporated within the Action Plan for the alleviation of energy poverty, are expected to deliver the required energy savings for achieving the foreseen sub-targets. Overall, nine measures will be launched, while the initiation of the Energy Efficiency Auctions and the establishment of targeted one-stop shops for energy poor households are considered meaningful means for the achievement of the targets in conjunction with the implementation of the Social Climate Plan.

The new Energy Efficiency Directive includes provisions in its Annex V to progressively exclude energy savings from

new fossil fuel technologies (for achieving the Article 8 target). Will these new provisions have implications on the policy measures reported by Greece?

The provisions of Annex V in regards the energy savings from new fossil fuel technologies will be taken into account during the design of new energy efficiency measures. Furthermore, the existing measures will be modified appropriately so as to be in full compliance with Article 8 of the EED.

Would you have lessons from recent evaluations of policies for future delivery?

Identify the most cost-effective measures to handle efficiently the available public funds and intensify the existing measures before launching new ones in order to avoid potential delays.

What would be the main challenges you see for the coming years?

The application of a multifaceted policy mix targeting to multiple sectors is essential to maximize the triggered energy savings. It is crucial to exploit the untapped energy saving potential in all end-use sectors (e.g. buildings, transport, industry). Finally, the introduction of new financing instruments is imperative (e.g. fiscal measures) to foster the broader participation of the different end-users and to increase the existing levels of leverage.

If you could go back in time, what would you do differently?

Avoid delays in the implementation of the policy measures and address the various administrative bottlenecks that hinder their



timely execution maximizing the declared energy savings.

Interview with Minas Iatridis (CRES – Administrator of EEOs)

Have there been changes in the EEOs in recent years? (if so, what would be the main ones?)

A main change concerns the allocation of the target to more Obligated Parties, primarily electricity and gas network operators. The scheme has so far received full support from the Obligated Parties and is considered one of the most successfully implemented energy efficiency systems not only in Greece but also in Europe.

Did you see an impact of the energy prices crisis on the EEOs? (e.g. in terms of budget, participation, ...)

Yes, the EEOs has completed its first phase and is now in the second phase. More specifically, the phase 2017-2020 started with a pilot approach, where retail energy companies (electricity, natural gas, petroleum products) primarily implemented low-cost behavioral measures, without significant investments. In phase 2021-2030, although it coincided with the energy crisis, no major disruptions occurred. However, the new phase requires Obligated Parties to implement technical measures that must represent at least 30% of their total target by 2030. These measures are costly, but their contribution will be highly significant.

The EEOs has already been established by the Greek government and is overseen by CRES as Administrator for Calculation, Control, and Verification. According to the Government Gazette, each company must

achieve specific savings targets, which are distributed over time with a gradual increase in requirements. The technical solutions to be adopted include high-efficiency applications, network upgrades, and the promotion of clean technologies.

What could be bottlenecks or drivers that could hinder or support the achievement of higher results?

The main challenges faced by Obligated Parties in achieving higher energy savings targets primarily stem from the financial burden of the measures required under the EEOs. More specifically, many behavioral measures have low implementation costs, allowing Obligated Parties to absorb them without passing the financial burden onto end consumers. However, their overall contribution to energy efficiency remains limited, as they rely on consumer engagement rather than structural improvements. Technical measures present the greatest challenge, as they require substantial investments and longer implementation timelines. Their adoption is essential, given that cannot be less than 30% of its target by 2030. However, their high costs exert significant financial pressure on Obligated Parties, forcing them to balance investment choices against profitability.

Are there specific provisions to ensure the quality of the actions implemented?

Each measure implemented by the Obligated Parties is monitored for

compliance with quality standards, based on current legislation and company-specific regulations. Compliance requirements cover key areas such as Health and Safety. Actions must meet all safety standards, minimizing risks for both workers and consumers.

- **Environmental Protection:** The implementation of measures complies with regulatory requirements for emission reductions and sustainable resource use.
- **International Certifications:** Many of the products or installations used are ISO or EN certified, ensuring transparency and reliability in energy solutions (e.g., certified LPG cylinders or installations complying with ISO standards).

The EEOS defines inspection and verification processes, which are conducted by CRES. Companies are required to document their actions through the EEOS Information System, where all quality and performance-related data is recorded. Adherence to these procedures enhances the credibility of EEOS, ensuring that energy savings are achieved with high-quality standards.

How were the priority groups (or eligibility criteria) defined?

The EEOS incorporates incentive mechanisms to encourage Obligated Parties to implement energy efficiency measures, with priority given to low-income and vulnerable households. The targeting of these groups is based on the Action Plan for Addressing Energy Poverty, which sets specific eligibility criteria. The key Policy Elements are (a) households affected by energy poverty receive special support

through measures implemented under EEOS and (b) Energy Savings Units (ESUs) derived from (i) Technical Measures that are increased by a factor of 1.4 and (ii) Targeted Measures that are increased by a factor of 1.1. This approach enhances energy justice, providing additional incentives to support the most vulnerable groups.

If you could go back in time, what would you do differently?

I do not believe that the initial phase of the EEOS (2017-2020) required significant changes. Since it was a new measure for Greece, the Obligated Parties, despite their initial doubts, successfully adopted it, achieving nearly double the set target.

This confirms that EEOS functioned as a mutually beneficial (win-win) initiative both for the Obligated Parties, allowing them to offer improved products and services to end consumers and for the achievement of the national energy efficiency target.

Beyond compliance, the Obligated Parties could leverage the measure as a strategic advantage, strengthening:

- Their commercial positioning and communication, through recognitions, certifications, or awards that highlight their contribution to energy efficiency
- Their connection with Corporate Social Responsibility (CSR) programmes, integrating energy efficiency into sustainable practices and enhancing their corporate image.

With this approach, EEOS could evolve into a tool not only for compliance but also for growth, fostering a stronger culture of energy responsibility.