

Summary of the national advocacy campaigns

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ABOUT CLEAR-X

Consumers Leading the EU's Energy Ambition Response, Expansion (CLEAR-X) is an ambitious extension of a tried-and-tested methodology, designed and developed to address consumers' needs thus **enabling consumers to lead the energy transition by investing in renewable energy sources (RES) and energy efficient (EE) technologies**.

The project covers some of the [countries](#) where financial, administrative/regulatory and technical barriers were most often perceived by the consumers during their journey to RES technologies.

These countries, Bulgaria, Cyprus, Lithuania, North Macedonia, Slovakia & Slovenia, were therefore selected for the potential impact of introducing collective purchase schemes, geographic diversity compared with similar past projects, and the presence of suitable consumer organisations.



There are four specific objectives:

- Reliable information on RES and EE technologies suitable for consumer's homes is available
- Consumers collectively invest in suitable RES technologies through trusted schemes
- Consumers receive relevant information and advice on RES and EE technologies
- Regulatory frameworks facilitate consumers' adoption of RES and EE technologies and relevant market offers

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INTRODUCTION

The main goal of the CLEAR-X Work Package 5 was to help consumers to engage in the energy transition by making their journey towards the purchase and installation of RES technologies easier.

Work Package (WP) 5's primary objective was to shape regulations, policies and incentive schemes so they better match consumer needs, facilitate consumers' active participation in energy markets, and facilitate their engagement with renewable energy sources (RES) and energy efficient (EE) technologies.

Six members of the project consortium analysed existing national legislative frameworks and the state of implementation of the Clean Energy Package in the six target countries. They also identified regulatory barriers to buy and install RES and to becoming a prosumer (CLEAR-X D5.1). In the next step, project partners developed tailored policy recommendations in their target countries (CLEAR-X D5.2) with an overview of eight real-life barriers preventing consumers from becoming prosumers as well as recommendations on how to overcome these barriers in the target countries.

Deliverable D5.3 is the outcome of two tasks, namely Design and coordination of advocacy activities (Task 5.3) and Promotion of innovative funding schemes for RES (Task 5.4). This report therefore presents an overview of the advocacy activities in the target countries throughout the implementation of CLEAR-X and describes in detail how each advocacy plan was implemented. It offers insights into the process of designing individual advocacy plans, their fulfilment, the response to external circumstances and the results that were achieved.

DESCRIPTION OF DESIGNING NATIONAL ADVOCACY PLANS

To launch task 5.3, Design and coordination of advocacy activities, the Work Package Leader (WPL) prepared detailed guidelines with five steps on how to develop and implement an advocacy campaign. There were five key components to be included: clear advocacy messages, stakeholders' identification, appropriate tools, work plan and stakeholder engagement.

After a workshop organized by the WPL for partners to better understand the whole process of developing an advocacy plan, partners prepared their national plans. All project countries had to consider the specificities of their market environment: legal, political, social, technical, and geographical aspects.

Clear advocacy messages, stakeholders' identification, appropriate tools, work plan and stakeholders' engagement as the cornerstones of the advocacy plan

As part of the project's Key Performers Indicators (KPIs), each partner had to plan and implement advocacy activities, which have the potential to influence national strategies and policy making processes in the area of renewable energy at all governance levels and would impact existing funding schemes for EE and RES measures implemented in households. Moreover, partners were tasked with advocating for the creation and adaptation of new specific funding schemes, whenever possible.

INITIAL NATIONAL ADVOCACY PLANS

Bulgaria

Bulgarian Consumer Association **SDRUZHENIE BULGARSKA NATSIONALNA ASOTSIATSIYA AKTIVNI POTREBITELI** (BNAAC) decided to focus on the following strategies and policies:

- Accessible investments in renewable energy sources through the scheme for renovation of buildings towards energy efficiency and other schemes.
- Encouraging households to start projects of RES renovations to increase energy efficiency and support energy communities.
- Schemes for interest free loans or loans with low interest rates for RES projects for households and co-funding schemes with financial participation of households.

These three strategies became the main messages of the Bulgarian Advocacy Plan and BNAAC created the following plan of activities to impact strategy and related policies mentioned above:

- To review legislation and lobby for changes which will make access to RES and EE easier for consumers.
- To take active part in governmental commission for energy efficiency for easier access to investing schemes in the field of RES and EE.
- To take active part in governmental commissions to reform the process of encouraging households to start renewable energy projects.
- To lobby for amendment of the Law of Condominium Management to make the decision making of general assembly of multi-family residential buildings and the process of application for collective loans for RES and EE easier.
- To lobby for a change of the Energy Law for easier access for RES to the energy network of energy providers.
- To lobby for a change of current regulation for easier access to tax reductions for natural persons, who invest in RES projects and different projects towards energy efficiency. To convince political parties to add facilitation of RES and EE choices to their election manifestos.

Cyprus

Cyprus Consumers Association **KYPRIAKOS SYNDESMOS KATANALOTON** (CCA) developed its Advocacy Plan mainly on the following strategies and policies:

- Better access to information and data about RES and EE directives to all consumers.
- Better access to accurate information about best offers of photovoltaics and air-conditioners and access to accurate information about their installation for all consumers.
- Easier access for consumers to different forms of financing of RES devices and to available funding schemes, especially for low-income households.

Based on the selected strategies, CCA highlighted the following messages, as the fundamental pillars for its Advocacy Plan:

- Access to different types of financing/funding schemes of RES and EE for low-income households and standard consumers is key.
- Accessible and accurate information should be made available to all consumers for green loans.
- Accessible and accurate information should be able available about the electricity tariffs in Cyprus (Tariff 08).

CCA prepared the following list of activities to achieve their defined goals:

- To identify the gaps and the malfunctioning of national legislation in relation to RES and EE directives.
- To discuss problematic legislation with public bodies and the relevant trade committee.
- To organize meetings and workshops with stakeholders to discuss consumer access to information and data about the RES and EE directives.
- To organize information campaigns for consumers, including on existing misleading information

- To organize meetings with public bodies.
- To organize meetings with suppliers and installers.
- To review legislation and best practices from other countries.
- To organize discussion with the Ministry of Energy, Commerce and Industry and the Ministry of Finance about public fund on RES and EE.
- To organize the discussion with other bodies (local banks) about the accessibility to green loans.
- To carry out market research on green loans.
- To organize meetings with stakeholders about barriers concerning the accessibility to funding schemes to make the necessary changes.
- To promote relevant information to consumers.

Lithuania

Lithuanian consumer organisation **ASOCIACIJA LIETUVOS VARTOTOJU ORGANIZACIJU ALJANSAS ALLIANCE OF LITHUANIAN CONSUMER ORGANISATIONS (ALCO)**¹ decided to focus on strategies to remove obstacles to switch to RES such as high up-front costs, barriers of multi apartment buildings and the rental sector, lack of information and consumer protection and regulatory obstacles.

To reach the goal, ALCO prepared the following plan of activities:

- To lobby for local actions via municipalities, proposing to build solar parks for vulnerable people locally.
- To lobby to enable the tenants to switch to RES.
- To propose amendments to the Recovery and Resilience Plan.
- To advocate for the development of one stop shops/consumer advice centers in municipalities to provide relevant information about RES and EE technologies.
- To accelerate adoption of national measures to implement the REPowerEU package.
- To propose a national pilot project to explore the technical feasibility of, and consumer involvement in, the switch to RES.

Republic of North Macedonia

The Consumers' Organisation of Macedonia **ORGANIZACIJA NA POTROSHUVACHITE NA MAKEDONIJA SKOPJE (OPM)** decided to focus on the following strategies:

- To influence legislation on RES and promote related policy changes for the benefit of consumers.
- To improve consumer's access to high quality air-conditioners.
- To improve access to subsidies and available loans for as many consumers as possible, including households with low-income.

¹ Now legally called Lithuanian Consumers Alliance (LCA)

Key messages developed by OPM:

- Need to increase awareness about the subsidies and loans provided to consumers.
- Need to review different schemes of financing, conditions and opportunities related to consumers' purchasing of RES and EE technologies.
- Need to raise awareness about consumers rights related to purchase of EE and RES.
Improve access to RES and EE products for consumers through reliable information about tariffs.

Actions planned by OPM to achieve defined goals:

- To organize meetings with target groups (relevant ministries, municipalities, agencies, consumers, producers, sellers, experts, NGOs working on similar issues, representatives of other projects, etc.) to present OPM's work within the CLEAR-X project and to discuss legislation and policy measures regarding RES and EE.
- To initiate the amendment of legislation regarding VAT for EE and RES by organizing a meeting with the Ministry of Economy and the Regulatory Commission of energy and water resources.
- To organize meeting with the Ministry of Economy - sector for energy to discuss subsidies and other possibilities to provide better conditions for consumers.
- To organize meetings with banks, which offer loans for EE and RES technologies.
- To organize meetings with stakeholders to take joint actions.

Slovakia

The Slovak consumer association **SPOLOCNOSŤ OCHRANY SPOTREBITEĽOV (S.O.S.) Poprad** (SOS) focused on contributing to strategies and policies which:

- Help to adopt and implement the Electricity Directive, Renewable Energy Directive and Energy Efficiency Directive to national legislation.
- Improve national policies within the competence of the Slovak energy regulator and strengthen the position of this authority.

In addition, one of the main priorities of the S.O.S. advocacy plan was to influence the two funding schemes "*Green to households*" and "*Renovate your house*" so they work better for consumers.

SOS main messages for their advocacy activities were:

- Map, divide and prepare supporting schemes and instruments of all available finances (Modernisation fund, Environmental fund, Programme Slovakia) in the national budget and from EU funds (Recovery and resilience plan, RePower EU, ETS system) to lower the energy consumption and improve energy efficiency of all existing buildings in Slovakia.
- Renewables are the future. Enable all households to use their potential. If we miss this train now, Slovakia could be left behind in the renewable transition.
- Forget the traditional, centralized energy market as we've known it in previous decades. Everyone can produce their own energy now - alone or as a member of energy community.

To achieve the above-mentioned strategies, SOS planned the following activities:

- To include RES into the Conception of protection of vulnerable energy users as one of the solutions to tackle energy poverty.
- To avoid double distribution payments for prosumers.
- To make the administration process of connecting RES to the grid less administrative and faster.
- To define groups of different building owners, map possible sources of public funding from past unspent, current and planned sources (Recovery and resilience plan, ETS, Social and climate fund, EU funds, national transformation plans...) and advocate for distribution of those finances to different groups to make who will prioritise renovations.
- To lobby for an effective definition of prosumers and energy communities
- To convince the energy regulator to make consumer protection a priority.
- To ensure fair regulation policies in times of energy crises and war.
- To implement longer moratoria for disconnections for more vulnerable groups.
- To change the registration system of the “Green to households” programme to make this scheme easily available to all consumers.
- To lobby for the creation of a special scheme for low-income households to get support for EE and/or RES.
- To lobby for an increase in finances allocated in the state budget to enable more households to renovate.
- To lobby for the creation of a special scheme for multi apartment buildings for EE, photovoltaics and heat pumps.
- To advocate for criteria to get state support reflecting the needs and real capacities of households.
- To add more vulnerable groups of households entitled to get 95% coverage of the renovation costs in the “Renovate a house” scheme.

Slovenia

Slovenia’s consumer organization **ZVEZA POTROŠNIKOV SLOVENIJE (ZPS)** prioritised influencing strategies and policies leading to:

- Improving the availability of state subsidies and loans for consumer investment in RES and EE for middle and low-income households (Eco fund); and more accessible and accurate information for all consumers in the fields of RES and EE.
- To improve the access of consumers to high quality devices and installation.

Key messages disseminated by ZPS:

- Easier access to RES and EE funding for all.
- Make green consumer choices affordable.
- Consumer information tailored to individual groups: digitally literate/illiterate, older, energy-poor households.
- An easier path to quality solar power plant.

Actions planned by ZPS to be implemented during project time:

- To identify the loopholes in RES and EE policies.
- To appeal to the Ministry of Environment, Climate and Energy and the Eco fund demanding changes to available subsidies.
- To make public appeals to policy makers for the necessary changes of legislation, providing additional funding, etc.
- To organize stakeholders' meeting/workshops to indicate possible barriers for improvement.
- To provide RES and EE information and benefits for consumers.
- To raise public awareness of the problematic areas, particularly misleading information to consumers.
- To organise meetings with suppliers and installers.
- To review legislation and propose changes to legislation.
- To research green loans in Slovenia.

SUMMARY OF ADVOCACY ACTIVITIES AND THE IMPACT ACHIEVED AT NATIONAL LEVEL

After the creation of national advocacy plans, partners undertook various advocacy activities. While implementing their advocacy plans, partners encountered difficulties in bringing forward their goals, mainly due to the economic and political situation. To overcome these barriers, partners made additional efforts in communicating with relevant national authorities to ensure that better access to RES and EE technologies to all consumers is included in the priorities of their national governments.

Partners learned that a certain level of agility and adaptability was required in their advocacy plans, as during the implementation of the CLEAR-X project there were many changes due to war, interrupted supply chains, preliminary or planned elections and political changes, climate change, energy crisis, inflation, living costs crises etc., which obviously had an impact also on the advocacy goals set at the beginning of the project.

BULGARIA

The core of advocacy work in Bulgaria related to the participation of BNAAC in the Governmental commission on energy efficiency, which included six meetings. Representatives and experts from Bulgarian National Association Active Consumers were actively involved in the commission, prepared and sent many proposals to the relevant institutions. One of the proposals was to simplify the establishment of an association of owners, which would increase the involvement of apartment owners and make it easier for them to invest in energy efficiency and renewable energy. Bulgarian National Association Active Consumers proposed to lower the quorum required to form an association, making it easier to establish a legal entity. By reducing the quorum, it would be easier to create an association of owners and for them to apply for investments in energy efficiency and renewable energy.

Part of this proposal also called for reducing the administrative hurdles associated with registering an association of owners with various registries. This would make it easier for households to submit documents to one administration and that administration to forward them to the relevant other institutions.

After the adoption of changes to the Condominium Management Act, it will be easier to make decisions, and professional house managers will be subject to strict control. The general meeting will be able to be held in a mixed mode of work - in person and online, and the quorum is reduced.

Following the recommendations outlined in D5.2, BNAAC dispatched letters to the Council of Ministers, the Ministry of Regional Development and Public Works of the Republic of Bulgaria, the Ministry of Energy of the Republic of Bulgaria, and the Commission on Energy Efficiency and Tackling Energy Poverty. Additionally, BNAAC extended correspondence to all political parties, the National Assembly, and the Ministry of Finance, seeking meetings and fostering further collaboration.

Throughout the project's execution, BNAAC actively engaged with various responsible institutions by sending a series of letters and proposals. Their objective was to streamline decision-making processes within condominiums by advocating for amendments to the Condominium Management Law. Moreover, BNAAC suggested an enhancement of tax relief for real estate improvements and repairs to incentivize consumers to adopt energy-efficient measures.

Unfortunately, BNAAC encountered significant challenges during the project implementation, due to political instability and repeated government collapses in Bulgaria, making it considerably challenging for BNAAC to effectively convey their advocacy messages to state stakeholders. Therefore, aiming to maximize its impact, BNAAC decided to focus more on communicating to the public, and to civil society, as well as industry, about the project.

Type of advocacy activity	Number of activities
Workshop	1
Meetings	6
Legislative activities	3
Advocacy advice (position paper/statements/letters)	8

Results achieved and their impact on national funding schemes

Changes to the Condominium Management Act (Adopted). The changes help make condominium decisions easier, by facilitating the renovation and RES installation process of multi-unit buildings. This was a key policy recommendation of the CLEAR-X project and will provide wider opportunities to apply for various European programs and financial schemes for improving the building, making it energy efficient and using energy from renewable sources.

Raising awareness about energy efficiency and the switch to RES for housing, especially multi-unit buildings (ongoing). BNAAC urged municipalities to participate in the development, financing and implementation of projects and schemes for improving energy efficiency and the use of energy from renewable sources. Municipalities should work in the direction of administrative relief and simplification of application procedures, as well as ensuring widely available information through targeted information campaigns regarding announced programs and schemes for financing households to carry out energy-efficient measures, projects, and schemes.



Call for legislative changes to encourage investment in energy-efficient measures (Under discussion). BNAAC proposed to make a change regarding the tax relief granted by law, which can be claimed by natural persons on the labour costs associated with EE measures for residential homes. With the increase in the amount, consumer investment would be encouraged.

Easy access to RES (Under discussion). BNAAC repeatedly sent various proposals and letters to the institutions to ask for changes in the Energy Law. These changes aim to facilitate procedures and consumer access to RES, as well as the inclusion of RES in the suppliers' energy network.

CYPRUS

Advocacy work of CCA in Cyprus included activities to improve access to financing EE and RES technologies. CCA held meetings with the companies Polart Energy, Domenica Solar, and Eletoyia Photovoltaics, to provide financial facilities for consumers who do not have a stable financial budget and cannot afford to buy or install RES technologies, such as PV panels. These companies agreed to grant financial support to consumers for the purchase and installation of photovoltaic systems, which consumers could return gradually over time with zero interest rates. This agreement was for the first time applicable for consumers engaged in collective purchases organized by CCA under the project CLEAR-X.

Moreover, in collaboration with the Ministry of energy, CCA proposed to local banks the inclusion of vulnerable groups of consumers in their consumer loan plan, but the reaction to this proposal was rather negative.

After continuous effort from CCA, the organisation became a full member of the board of the RES fund committee, being officially registered in the law (Art. 7, Law 108(I)/2022). This will help add the consumer point of view to all ongoing debates about the switch to renewables and how to fund it, even after the project ends.

CCA also tried to mitigate the impact of energy crisis on consumers and requested the president of Cyprus to extend the period of the reduction of the consumption tax on electricity. The request was accepted, and two-months' additional time was added to the reduced-price period.

Further activities were devoted to speeding up the process of installing smart meters. One of the bureaucratic issues delaying the roll-out of solar panels in Cyprus had been a lack of capacity to process grid connections at the Electricity Authority (taking about three months from the moment of request). Following complaints from CCA, the Ministry of Energy, Commerce & Industry acknowledged the problem, and agreed to increase the number of staff at the Electricity Authority to deal with the level of demand.

A second issue that concerned CCA was the Electricity Authority's plans to charge consumers for installation of their smart meters. Again, with complaints from CCA and an acknowledgement that smart meter roll-out across Europe is already a matter of national legislation, the Electricity Authority agreed to remove this financial burden, thus speeding up the roll-out and acceptance of smart meters.

Finally, CCA arranged a meeting with the Minister of Energy regarding the simplification of the application process for subsidy schemes, to develop alternative methods of application submission for vulnerable groups of consumers and to speed up the application approval. The ministry assured CCA that it will look into the consumers' request and try to find measures to make the application process as simple as possible for consumers and especially the vulnerable groups. Electricity Authority of Cyprus announced that they will hire more employees to faster the process.

Type of activity	Number of activities
Workshop	1
Meetings	4
Legislative activities	2
Advocacy advice (position paper/statements /letters)	5

Results achieved and their impact on national funding schemes

Improvement of subsidy schemes (Achieved-Ongoing). After CCA's meeting with the Minister of Energy, the Government issued a public statement announcing measures against high prices/costs of investment. Among these measures is the new "Photovoltaics for All" scheme, which will be effective from January 1, 2024. This plan is about the installation of photovoltaic systems in 6,000 consumer's homes, by paying in 150 euros as a monthly instalment.

Improving access to financing RES technologies (Achieved). CCA managed to make an agreement with photovoltaic system suppliers to grant financial facilities to consumers for the purchase and installation of photovoltaic systems, which consumers should return gradually, with zero interest rates.

Speeding up the process of connecting photovoltaic systems to the grid (Achieved). After CCA's suggestions the Electricity Authority announced they would hire extra employees to speed up the process of the connections.

Rolling up of smart meters (Achieved). CCA succeeded in having the Electricity Authority's agreement to install smart meters for consumers without any charges, making renewables more accessible to consumers.

LITHUANIA

The aim of ALCO's advocacy actions was to get as many people as possible to switch to RES as soon as possible, by working with stakeholders' groups to address 8 barriers described by ALCO in its Advocacy plan. However, one has to take into account the context, in which RES is made attractive and available to consumers in Lithuania.

Since 2019, Lithuania boasts a highly attractive prosumer market, with multiple barriers of RES ownership and self-produced energy consumption already removed. Via the existing scheme, nation-wide remote production and consumption of solar photovoltaic energy is allowed and promoted. In the scheme, the distribution grid acts as a 'virtual battery' for excess electricity, which a prosumer can use later with a net-metering model in place. The scheme works on a digital platform: one can become a prosumer at a click of a button; the process in most instances is paperless. The website <https://www.eparkai.lt/> sells and rents solar parks to retail clients, the offer prices are low enough to allow 4 to 6 years payback period. The purchase of rooftop solar or solar park is subsidized to help kick-start the scheme, however, interest from consumers and developers is mainly driven by private investments.

Year after year, Government removes one barrier after another, to make its medium-term plan possible: first, reach a target of 510,000 prosumers in the country by 2030, and second, by the same year 2030, ensure that 93% of all electricity consumed in Lithuania is produced from solar and wind.

In such a context, most of ALCO's attention was directed to finetuning government plans to make sure that a social justice aspect is prioritized throughout the policy making process. ALCO organized a workshop with the Ministry of Energy, the Ministry of Environment, the Environment Project Management Agency (APVA), the Lithuanian Institute of Energy, and the Lithuanian Energy Agency to impact discussion leading to the establishment of Consumer Empowerment Panel on Energy Efficiency. The focus of this interinstitutional stakeholder's group was directed on delivering consumer information to ensure the promotion of measures aimed at alleviating energy poverty. With activities of the CLEAR-X project progressing in 2021-2022, ALCO held multiple bilateral meetings at different political level with all stakeholders listed above, to discuss different aspects how the current scheme could be made more just and easier to access by vulnerable groups.

By ways of written communication, ALCO sent several letters to the Ministry of Energy asking for the political support for the development of pro-consumer schemes. In multiple instances, ALCO's support counterweighted certain industry pressures, allowing more balanced public debate. The most contentious issue, raised to the forefront of the public attention in Summer 2023 by the consortium of large wind and solar developers, is the following: large developers need 'more space' in terms of network capacity for their industrial scale solar and wind parks. They believe that prosumers' quota should be reduced, and the 'freed' quota should be assigned to industrial (sometimes also called 'utility scale') renewable energy parks. Such a reallocation of quotas would put a lid on prosumers' growth prospects. ALCO stood firm in all public debates and closed meetings for the continuation of

the existing quota regime. In the end, no change in quotas was confirmed by the Ministry of Energy: this ensures that prosumers in Lithuania can continue grow in number and in capacity figures.

To secure political backing for the future advancement of pro-consumer initiatives, ALCO arranged a meeting with the Chairman of the Environment Committee of the Lithuanian Parliament and the Minister of the Environment of the Republic of Lithuania. The latter, along with Mr. Eamon Ryan, the Minister for the Environment, Climate and Communications of the Republic of Ireland, also participated in a side event at the United Nations High-Level Political Forum on SDGs in New York in July 2023. During this event, ALCO, in collaboration with other partnering non-governmental organizations and with the support of the Lithuanian Ministry of Environment, hosted a side event specifically designed to promote the Lithuanian RES scheme. At the event, CLEAR-X project was presented as a best practice example of NGOs involvement in energy transition.

In Parliamentary Committee on Economics meetings, ALCO strongly opposed the proposal of one of the Members of the Parliament, who drafted an amendment to the proposed legislation, effectively time-limiting the existence of the current prosumer scheme to 2030. After this date, all household prosumers of solar PV would be forced to adopt the 'net-billing' in place of the current 'net-metering'. ALCO did not agree with such a proposal and provided oral support for the Ministry's position; after some deliberation, this member of Parliament withdrew the proposed amendment.

Type of activity	Number of activities
Workshop	3
Meetings	7
Legislative activities	2
Participation in trade fair	1
Advocacy advice (position paper/statements/letters)	3

Results achieved and their impact on national funding schemes

A new scheme to enable adoption of renewable energy produced by wind turbines (in wind parks) is being introduced. Legislation is pending final approval by the Lithuanian Parliament (Seimas). ALCO contributed to the proper drafting of the package, removing opposing proposals which could have limited consumers' participation and benefits.

Improvement of law (Achieved). In June 2022, the Parliament adopted so called "Breakthrough Package", which brought the following changes: 1) installation capacity restrictions were removed (ie. maximum allowed overall capacity of a power plant removed and a restriction not to exceed allowable consumption capacity for remote prosumers abolished); 2) net-metering accumulation period prolonged from one to two years; 3) different pricing



models between household and non-household prosumers introduced; 4) certain permission for installation of RES requirements abolished; 5) hybrid (e.g. solar + wind + storage) power plants allowed. ALCO lobbied for these changes during its activities.

Continuation of the existing quota regime of network capacity (Achieved). ALCO insisted on maintaining the existing quota regime in favour of prosumers and achieved that no change in quotas was confirmed by the Ministry of Energy.

Avoiding the change from "net-metering" to "net-billing" (Achieved). ALCO strongly disagreed with one Parliament Member's proposal to change net-metering to net-billing, which was subsequently withdrawn by that Member.

REPUBLIC OF NORTH MACEDONIA

Consumer organisation OPM had several workshops with municipalities (Bitola, Ohrid, Kochany, Stip and City of Skopje and its municipalities Aerodorm, Gorce Petrov and Karposh) to advocate for the improvement of affordability and availability of RES and EE technologies. All of them adopted the annual programs for consumer protection, proposing EE and RES to become recognised in the municipal strategy for increasing consumer awareness about EE and RES. The programs were adopted by the Municipal Council.

In addition, OPM attended meetings with the Regulatory Commission of energy, the Ministry of economy, Council for Consumer protection of the Government, the Bank association and National bank. OPM also had meetings with economic interest groups representing sellers, energy agency, Ministry of economy, Municipality of Skopje and Bank association. OPM worked on creating clear criteria for subsidies, increasing the subsidies at the national and local level, increasing offers of green loans by banks, improving legislation for prosumers. When the legislation for prosumers was completed, OPM prepared a guideline for the procedure and presented to the ministry and public. OPM developed a consumer protection program of the City of Ohrid with EE and RES components integrated.

OPM had a meeting with National Bank's director of the Department for consumers' protection and financial education to discuss the possibility to create and offer green loans on energy market for consumers.

OPM presented recommendations for improving legislation based on the conclusions in the Energy legislation report in a meeting with the representative of Department for Energy in the Ministry of Economy. This analysis was presented on the panel discussion with policy makers.

OPM participated on MEF Energy Forum, which is a joint initiative of ZIP Institute, The Government of the Republic of North Macedonia, and the Delegation of the EU to North Macedonia. The panel, which OPM participated on, organized by the Center for environmental research and information "Eco-awareness", included discussion on how

local climate action can be integrated in the broader national and international climate policy goals and how local communities can be engaged in educating residents on climate action.

OPM participated on panel discussion named “Consumers at the heart of energy policy”, where the Ministry of environment, the Ministry of economy, the Energy and water services, the Regulatory commission of the Republic of North Macedonia, the Consumer council of City of Skopje, experts, representative from the EBRD, banks and other NGOs were present. The conclusions adopted were that energy transition cannot happen without energy efficient measures. Consumers should have available mechanisms/procedures to shift to EE and RES as well as advisory, financial and administrative support to realize these investments. The National bank after the panel discussion declared they will increase the amount of green loans and prepare a strategy to encourage green financing to provide guidelines for other green financial operations.

OPM officials have been coordinating meetings with various banks to discuss the current conditions for consumers seeking green loans. The discussions cover aspects such as interest rates and the banks' perception of the new opportunities for green loans related to energy efficiency (EE) and renewable energy sources (RES) products. These opportunities stem from the recently introduced scheme by the Green Finance Facility (GFF), a Program resulting from a collaborative effort involving the UN joint SDG, UNDP, EBRD, IOM, UNECE, and the government of North Macedonia. This [program](#) creates avenues for supporting consumers through green loans offered by banks and grants for EE and RES products facilitated by banks participating in the GFF program. The meetings took place at the premises of several banks, including TTK Banka AD Skopje (expressing interest in modifying the credit line concerning interest rates and the possibility of extending payment terms), Halk Banka AD Skopje, Sparkasse Banka AD Skopje, and Savings House Moznosti.

OPM additionally arranged a distinct meeting with GFF to endorse this programme and facilitate activities aimed at disseminating information to consumers regarding the banks participating in grant opportunities (providing up to a 30% grant for those using loans for EE and RES products).

Type of activity	Number of activities
Workshop	11
Meetings	13
Legislative activities	1
Advocacy advice (position paper/statements/letters)	7

Results achieved and their impact on national funding schemes

Improvement of subsidies for EE and RES technologies. To ensure such improvement for consumers, OPM conducted multiple meetings and workshops involving key policymakers at both state and municipal levels. These sessions engaged stakeholders such as the Ministry of Economy, Ministry of Environmental Protection, municipalities, the City of Skopje, consumer organizations, other pertinent NGOs, and the media. The objective was to advocate for the introduction of additional subsidies and the establishment of specific criteria, including

considerations for particular social groups, as opposed to the current "first come, first served" approach, for upcoming subsidy schemes. The benefits for consumers receiving subsidies based on specific criteria, and which facilitate investments in energy efficiency and renewable sources, were strongly endorsed during OPM's advocacy efforts. The recommendations and the necessity for legislative amendments and for subsidies with well-defined criteria, as identified in the legislative analysis conducted by OPM, were presented during a meeting with the representative of the Department for Energy in the Ministry of Economy. The planned improvement of criteria for subsidies will be part of the further discussion and activities of the Ministry of Economy during 2024.

New credit lines for green loans and better conditions. OPM's analysis highlighting the deficit in green loans and the elevated interest rates, presented to policymakers, the National Bank of the Republic of North Macedonia (NBRNM), banks, and savings houses, influenced an increased inclination among banks to transition toward green loans. Following a panel discussion, the National Bank expressed its intention to formulate a strategy encouraging green financing, aiming to provide guidance for other green financial operations. Information about these documents was subsequently posted on the NBRNM's website. OPM officials have been coordinating meetings with various banks, resulting in expressed interest and opportunities for enhancing the current conditions for consumers seeking green loans. Banks such as TTK Banka AD Skopje, Halk Banka AD Skopje, Sparkasse Banka AD Skopje, and Savings House Moznosti have shown interest in improving conditions. Additionally, there is potential for these banks to participate in the Green Finance Facility – GFF Program Component 3, which includes grants for green loans. OPM also organized a dedicated meeting with GFF to garner support for the project and conduct activities to inform consumers about the opportunities provided by GFF. At the time of the report writing, the banks were in the phase of decision making about the new products (green loans) and in cooperation with GFF line for additional grants for consumers. They are in cooperation with OPM for further activities in announcement of criteria for the target groups and banks that are offering green loans.

SLOVAKIA

Slovak partner SOS cooperated closely with the energy regulator on the preparation of the Conception of protection for vulnerable energy users, where concrete measures to make RES economically and administratively easily accessible also to energy poor households were included.

In September 2022 SOS participated in a workshop organized by the Slovak innovation and energy agency, where CLEAR-X recommendations were presented to influence involved stakeholders such as representatives of the Ministry of economy, the Ministry of environment, entrepreneurs in the energy sector and educational institutes preparing national legislation for energy communities. SOS presented an analysis of current subsidies for RES and EE technologies available at that time for consumers. SOS objected to the omission of multi-apartment buildings from the opportunity to receive a subsidy for the installation of photovoltaic panels and heat pumps from the "Green for households" program administered by the Agency. They claimed this was as a discriminatory rule and that owners of apartments in multi-apartment buildings should be allowed to get the subsidy for the installation of



PV panels as well as for the installation of heat pumps. SOS was also a member of the working group assessing the rules of the energy market in the context of implementation of the Energy Efficiency Directive and Renewable Sources of Energy Directive, where the framework for RES, prosumers and energy communities is modelled.

Moreover, SOS sent letters to responsible state agencies and managing authorities with suggestions on how to improve current state subsidy systems for EE and RES technologies to be more accessible and less administrative for households. Both schemes were changed also due to SOS communication in the first part of the project: a few positive changes for consumers were introduced, but both remained very complex and did not reflect the real needs of households who want to install PV or heat pumps.

SOS established cooperation also with the Union of Slovak Cities. The CLEAR-X project was presented, and the information was distributed to all members of this union.

The CLEAR-X project was presented also at a Consumer PRO training to participants from other consumer organisations, as well as the Ministry of economy, Ministry of justice, Slovak trade regulator, Slovak bank association and European consumer center.

CLEAR-X policy recommendations and experiences were shared at a bilateral informal meeting with the Director General of DG Energy Ditte Juul Jorgensen in Bratislava, and other representatives of DG Energy, and the Slovak EU Representation. This led to invitations to other important meetings and discussions on national level.

Type of activity	Number of activities
Workshop	8
Meetings	8
Legislative activities	6 (conception, directives, schemes)
Advocacy advice (position paper/statements/letters)	10

Results achieved and their impact on national funding schemes

Better access to RES for prosumers and energy communities (Achieved). SOS emphasized the need for national criteria for energy communities and prosumers, which are essential for RES development in general. As the result of communication and advocacy, also together as a member of the Cluster of Slovak energy communities (KEKS), we accelerated the creation of Energy-Data-Centre, which is crucial for data management and energy self-production. EDC was launched in active phase in October 2023, instead of July 2024, as it was originally planned. The Energy Data Centre is an essential platform for new market participants, such as energy communities, as well as for the implementation of new market models, such as the provision of flexibility services, which have been

transposed into Slovak legislation as part of the transposition of the Clean Energy for All Europeans package. The EDC is also a necessary tool to enable electricity sharing between people. Without this system, it is not possible to use the surplus electricity that the consumer generates from their PV panels e.g. in their other property, or to share with to their neighbour.

Pre-contractual information with EE connection and stronger position of consumers/prosumers on the energy market (Achieved). SOS - as a member of the expert group - participated in the adaptation of the new national Energy Act, which imposes rules on the energy market since the 1st July 2023. As a result of SOS' lobbying efforts, there is a new obligation for suppliers to add to the annual invoice also the contact details of consumer organisations and the state energy agencies, which provide information about available measures to increase energy efficiency. It also contains a new obligation for suppliers to inform consumers with fixed price tariffs about their right to install a smart meter and how to obtain one. SOS lobbied actively for those two measures as they can help and motivate consumers to become prosumers and shift to RES.

EE and RES as the solution for energy poverty (Achieved). SOS was a member of the energy regulator's working group, which prepared a national definition and strategy to tackle energy poverty. In relation to the project goals, they also developed specific state schemes for low-income households to help them to be make more energy efficient choices and advocated for more effective use of public sources to increase energy efficiency and use of renewable energy.

Easier and faster connection to the grid (Achieved). SOS advocacy and communication activities also contributed to a draft of new legal, unified rules for distribution operators to issue permits for photovoltaic systems and connect them to the grid within specific time periods and unified and clear obligations for all distributors. The public consultation finished on the 30th of October 2023 and the new rules, which are considered to be progressive in terms of easier and faster connection of PV prosumers to the grid, are expected to enter into force on the 1st of January 2024. Although the statutory deadline for distributor's consent for connection to the grid for small sources up to 10.8 kW remains unchanged at 10 days, for larger sources this regulation sets the same deadline for the whole Slovak territory at 30 days (until now each of the three distributors had different rules). In addition, if the distributor rejects the connection request (which often happens in some territories due to the poor condition of the grid), it will have to specify in its rejection opinion under which conditions the source can be connected.

Impact on state subsidy schemes (Ongoing). During the project period, SOS advocacy activities brought some positive measures in both schemes "Green for households" and "Renovate your house". Unfortunately, these improvements ended up being short-term. "Green for households" was stopped in March 2023, while "Renovate your house", opened on a short-term basis and with limited finances. After criticism for omitting multi-apartment buildings from subsidies for PV panels and heat pumps, a new programme, again titled "Green for households" opened from 30 October 2023, allowing owners of apartments in multi-apartments buildings to apply for subsidies for PV panels and heat pumps installations.

SLOVENIA

ZPS engaged in legislative procedures for the transpositions of EU directives (Renewable Energy Directive, Electricity Directive) and other relevant legislation for the project. ZPS sent eight proposals to public consultations, in which recommendations from CLEAR-X project were included.

ZPS cooperated with other non-governmental organizations (mainly the NGOs Focus and ZPM Moste Polje) for joint statements and joint press conferences focused on energy efficiency and facilitating use of RES technologies for all consumers.

ZPS participated to workshops on designing measures to reduce energy poverty (how to ensure information and access to RES and EE for vulnerable consumers), presenting recommendations and information from the CLEAR - X project in more detail. The partners of the project designing measures to reduce energy poverty were the Ministry of the Environment, Climate and Energy, the Centre for energy efficiency of Institute Jožef Stefan, the Institute for economic research and NGO Focus. In the field of energy poverty, workshops were held to establish the starting points for the preparation of the Action plan for reducing energy poverty. ZPS participated in workshops as part of the CLEAR – X project, stating that the recommendations of the project should be considered also with vulnerable consumers.

ZPS advocated towards the Ministry of the Environment, Climate and Energy and Eco Fund to improve the availability of subsidies and loans for RES and EE investment for middle-and low-income households. The goal was to ensure access to the subsidies even for an elderly population, which might be less skilled in digital tools. The state's Eco Fund will offer loans with a fixed interest rate, and in addition a new method of selecting measures for obtaining subsidies is being prepared. The subsidy amount will be linked to the household's income, favouring households with lower incomes.

ZPS demanded to postpone the introduction of dynamic network tariffs to 2024, to have more time to inform and prepare consumers for this major change. The request was accepted. This does not impact a consumer's right to a dynamic price contract, which ZPS would support if it were made available in Slovenia.

ZPS prepared several appeals to the Ministry of Environment, Climate and Energy, Ministry of finance, Energy Agency, Eco Fund and two Chambers.

Throughout the second phase of the project, ZPS' primary focus has been on advocacy activities, complemented by meetings with relevant stakeholders, as described below.

ZPS sent a letter to the Ministry of Environment, Climate and Energy exposing problematic areas of the consumer-friendly transition to RES, which are the lack of qualified installers and systematic improvement of the situation on the market, grid connection problems for small solar power plants, absence of dynamic price offers, availability of

subsidies and loans for consumer investment in RES and EE and low accessibility to independent information about RES and EE for households.

ZPS informed the Ministry that additional attention should be paid to ensuring the professionalism and competence of independent experts since consumers report many problems due to low-quality installation of devices and difficult access to qualified installers. ZPS proposed that after the completion of the supplementary training, a mandatory knowledge test be set, as the only way to ensure the sufficient competence of independent experts.

ZPS proposed an income tax relief, a reduction or exemption from paying VAT and the possibility of reducing the municipal tax on real estate for households since tax reliefs for the green transition are already available to companies. The Ministry of finance highlighted the necessity to carry out a broader discussion on the change of VAT rates, during which the proposals of ZPS will also be taken into account.

Upon invitation, a ZPS representative spoke at the “Financing energy efficiency in the residential sector national roundtable”, organised by the European Commission in partnership with Jožef Stefan Institute, Energy Efficiency Centre (JSI EEC) and under the auspices of the Ministry of Environment, Climate and Energy, Ministry of Economy, Tourism and Sport and Ministry of Cohesion and Regional Development, addressing the housing green loans market. The results of the ZPS’s analysis of the green credit market were presented - which banks offer them, under what conditions, what counts as "green" (financing purposes) and what are the differences in financing costs compared to conventional credits. Key findings: Less than half of providers offer specific green credits; more providers with well-designed and affordable green credits would be expected to act as an important lever to encourage such consumer investments. The problems of consumers, who are faced with an additional challenge in financing their green projects due to increasingly expensive borrowing, while at the same time their disposable income is generally decreasing due to inflation (as a result, their credit rating is also lower ability) were highlighted.

ZPS commented on the proposal of the Energy Policy Act emphasizing that the state should strive to differentiate energy and heat sources for heating and other needs, which would significantly reduce the vulnerability of the system, while at the same time enabling greater flexibility and easier pursuit of set goals. ZPS pointed out that changing the heating source can also mean prior/simultaneous energy renovation of the home, which significantly increases investment needed, and therefore becomes unfeasible for some (especially older, financially weaker consumers). Therefore, it is necessary to increase subsidies for energy renovations of buildings and make them more accessible, especially to those with average or low incomes.

Overall, the newly established or improved relationships with various stakeholders, such as the relevant ministries, the Fund, which offers subsidies and credits for RES and EE, different chambers, and various non-governmental organizations, are a positive result of the activities of ZPS in the project. It is estimated that these relationships will

be maintained also after the end of the CLEAR-X project, benefitting future actions, such as the ongoing CLEAR - HP project².

Type of activity	Number of activities
Workshop	5
Meetings	4
Legislative activities	8
Advocacy advice (position paper/statements/letters)	8

Results achieved and their impact on national funding schemes

Better availability of state subsidies for consumer investment in RES and EE for middle and low-income households (Ongoing). As a part of the project, ZPS advocated for the need to **tailor tenders** for subsidies and loans more closely to middle and lower income households, by awarding **higher subsidy percentages** for lower income households per investment and by promoting the possibility of introducing at least partial prepayments of subsidies.

The draft Climate Law, which is currently under public consultation, also contains provisions on the functioning of the Eco Fund. The newest concept is an article according to which the amount and conditions of the incentive are determined differently, depending on the financial situation of the investor. The proposed Article allows the Eco Fund to take into account the criteria of the material situation of the applicant when determining the conditions for obtaining the incentive and the amount of the incentive. If the provision comes into force, this would meet one of the requests of the ZPS that calls for subsidies and credits should be more tailored to households with average and lower incomes.

Improved offer of green loans (Achieved). ZPS advocated for the improvement of loans by suggesting to the Eco fund to also offer loans with a **fixed interest rate**. The proposal was also presented to the Ministry of the Environment, Climate and Energy. In line with ZPS's advocacy goals, both stakeholders considered the proposal. Since the 2023 Eco fund offers loans with a fixed interest rate.

Postponement of the introduction of dynamic network tariffs (Achieved). ZPS sent an appeal to the Energy Agency to demand the Energy Agency to postpone the introduction of dynamic network tariffs to 2024. Given the absence of any information or awareness campaigns conducted by the Energy Agency on this change, ZPS emphasized the need to delay the implementation. This delay would allow stakeholders sufficient time to inform and prepare consumers for this significant change. The request has been approved and the introduction postponed to year 2024.

² The [CLEAR-HP](#) is a project co-funded by the European Union's LIFE programme under the grant agreement No. 101119923.

BARRIERS

1. Lack of reliable information, installers and an unpredictable market

All consortium members faced the situation, where there is not enough independent and detailed information regarding the possibilities and effectiveness of RES technologies on their consumer markets and in different communities. Consumer organisations are often the only body who try to provide impartial professional advice in the energy efficiency sector for consumers, but their capacity is limited. Best practices were found in Slovenia, where installers registered in the state support fund are verified, meaning their expertise, if not their advice, should be more reliable.

In most of the countries of the consortium it is difficult for consumers to compare, select and make an informed choice and they expect installers to inform them honestly on whether the selected technology is suitable and profitable for their home. So home visits by the installer are essential and a key part of the process when it comes to photovoltaic or heat pump installation, but they might not be unbiased.

Consumers also expect to get information about different possibilities to finance their transition from the state, from banks or from other sources. This can be misused by suppliers, who sometimes mislead consumers by not clarifying whether the final price includes a subsidy.

There are also public discussions in different countries on whether state subsidies distort market prices of RES technologies. Meanwhile, the availability of installers fluctuates, which is also bad for consumers. In 2022, there was a huge demand for renewables in light of the energy crisis and the desire to get off Russian gas. Consumers were forced in many cases to wait 3 to even 7 months for PV panels or heat pumps to be delivered, because supply chains failed. Given this demand, in 2023 suppliers prepared for higher demand in advance, but consumer interest was reduced in part due to removal of state subsidies, and cost of living crisis and inflation, leading suppliers to store products in warehouses due to lower demand (these products then risk becoming obsolete).

2. Market prices and no economic motivation or other benefits for prosumers and energy communities, ongoing problematic access to smart meters

From a consumer perspective, there are not enough price signals from energy markets in the project countries which would motivate consumers to consider switching to renewables. For photovoltaics, the remuneration rate, i.e., the price of electricity sent back to the grid is not attractive enough, and the whole administrative and technical process is bureaucratic and demotivating for the consumer. Heat pumps are not considered as attractive as gas boilers or central heating in countries like Slovakia, because the price of the electricity is three times higher than gas and prices are strongly regulated by the state for the following year. For this reason, BEUC and the CLEAR-X project partners have been lobbying for reductions in the taxes on electricity, particularly for home heating.

There are limited financial incentives or other benefits for prosumers and energy communities. However, tax deductions on electricity are being considered for introduction in Cyprus, Slovenia and Slovakia.

In project countries, we have witnessed also very slow appearance of energy communities due to late national legislation, complicated administrative and technical procedures and lack of awareness. In Slovakia, for instance, there is only one energy community registered officially until now.

Access to smart meters, which is crucial for consumers to be able to follow their consumption, is very slow in most of monitored countries, with a key exception of Lithuania, which is a best practice in smart meter roll-out. The fee for the smart meters is still problematic, suppliers try to shift the cost on consumers and states are just watching. Access to smart meters will be easier in Cyprus and Slovakia thanks to effective advocacy by the project partners.

3. Bureaucratic administration and connection process to the distribution grid, problems with storage and virtual batteries

Prosumers, dynamic contracts and energy communities are highly dependent on distribution systems operators, who manage the network or the grid. Consumers can not usually change their distribution system operators for electricity or heat. This puts them in a weak position. For photovoltaics, they must accept long waiting times to be connected to the grid. In all consortium countries there were very different specific administrative or technical obstacles brought up by different DSOs.

Another factor which discourages consumers from becoming prosumers is energy storage. Physical batteries are prohibitively expensive and the contract with the virtual battery provider is often expensive and not advantageous to the consumer.

4. High up-front costs of technologies and ineffective state subsidies, lack of green bank products

The investment in photovoltaics and particularly heat pumps is still very high for most households in EU. The price of electricity (often regulated) on most energy markets does not make this decision more attractive and makes the return on investment slower. Gas is still much cheaper with existing technical infrastructure in many countries.

In some cases, state subsidies are ineffective. Subsidies rarely reflect the situation in the market, sometimes leading to direct price increases on product. Subsidies are frequently rolled out at a bad time of year, such as a solar subsidy made available in winter. Many schemes do not focus on vulnerable, or energy poor consumers and in some cases, funds are wasted on consumers who could afford to pay for the investment themselves.

There is still also a very limited amount of bank or non-bank financial products motivating and supporting consumers in green transition. In the Republic of North Macedonia, the project partner has done a lot of work to kick-start the banking sector, but the process of launching new products is still ongoing.

5. In many countries, multi-apartment buildings are excluded from the green transition

The project consortium is made up of countries where a lot of consumers live in multi apartment buildings with central heating systems. These conditions often exclude them from green transition. In most of these countries, to get to the independent heating or own electricity production of multi apartment buildings requires a change in legislation at either national or local level. In Deliverable 5.2, the project partners highlighted ways in which multi-apartment buildings can be incentivised to participate in the transition. Tailored advice should be made available to consumers who live in multi-apartment buildings.

6. Energy poverty and renewables

From the perspective of households suffering from energy poverty, there are currently not many countries supporting their shift to renewables by different measures or focused state subsidies. Good examples can be found in Slovenia and Lithuania and for example the remote solar park share sector shows considerable potential for vulnerable families or apartment blocks.

There are several ways to involve such consumers in the green transformation through financial incentives, credit systems or health benefits. Buildings where vulnerable families usually live, require more attention from legislators, stronger administration support from municipalities and significant financial support from the state budgets.

LESSONS LEARNED

It's expected that when a consumer buys a product intended to last 15 years, that there might be issues with the product at some stage. This only becomes a problem when consumers cannot access adequate information, advice and liability. It is important to choose the right type of technology and product, as well as getting appropriate expert installation. It is crucial to choose a device with the right capacity. Different possibilities are suitable for homes with varying levels of insulation, radiator sizes, and older buildings. It is often necessary to make major or minor adjustments to the heating system or improve the thermal insulation of the building before installing a heat pump. The supplier should inform the customer in advance, if any necessary adjustments should be made, or if there will be heat losses. However, when choosing a supplier, most consumers do not know what to look out for, to avoid both scams and poor-quality incorrect installations.

Economic justification for RES

The economic justification of renewables should focus on reducing running costs. In all countries, the project partners have discovered that the main motivation for consumers to switch to RES has been to save on energy costs. However, the high price of electricity compared to gas in some countries (Bulgaria, Slovakia) makes heat pump operation less competitive than gas heating. These countries should follow, for example, the Danish model and reduce the taxation of electricity for heating, or the Dutch example of shifting charges from electricity to fossil fuels to improve the economic incentive for consumers to switch to renewable heating³.

The role of governments in promoting RES and subsidies for households

Of consumers in the project partner countries, Slovenian consumers are the most satisfied with the information available on subsidies, especially thanks to the government programme Eco Fund, which offers loans and subsidies for environmental projects, including the transition to renewable energy. For others, the Eco Fund should be used as a best practice on how to effectively implement ambitious state subsidy programmes for the development and promotion of renewable heating and communicate them in a clear and accessible way. Long-term and predictable state funding schemes need to be developed and similarly promoted everywhere.

Create a public list of certified RES suppliers/installers

Consumers often have difficulty finding suppliers and distinguishing between reliable and unreliable information and websites. Consumers in Slovenia are reassured by the list of installers provided by the state. Meanwhile, in Slovakia, a list of installers is provided by the state, but there is no verification process to ensure the quality of the installers.

More installers with more knowledge

Although many contractors perform well, consumers also face a lack of expertise among some contractors, whether it be a lack of knowledge on grants and funding options or a lack of knowledge on insulation and renovation needs

³ https://www.beuc.eu/sites/default/files/publications/BEUC-X-2023-102_From_Boilers_to_Heat_Pumps.pdf

to heat pumps. Some installers are not available to visit and inspect the house at all. Under the provisions of the Renewable Energy Directive, Member States must establish training programmes to ensure that there are enough certified installers to meet their national renewable energy targets. Member States should ensure that consumers wishing to purchase RES technology, can do so without long delays, which will only be possible if there are enough well-trained installers available.

Access to Alternative Dispute Resolution (ADR) for RES installations

National consumer organisations receive many complaints from disappointed consumers who have installed RES systems which do not work properly. However, EU legislation does not allow consumers who fall victim to a poor quality of heat pump installation, to access Alternative Dispute Resolution. To ensure that consumers feel protected (especially in view of the significant costs), consumer protection for heat pump installations and home energy renovations should be created at the EU level.

Consumer information, visualisation and expectations

The main source of information for consumers is the internet. Consumers mainly follow the results generated by a search engine, when they type in the topic, then look at specific manufacturers and then look for further information in links on consumer forums.

CONCLUSIONS

The findings of this report highlight the extensive policy and advocacy work undertaken by national consumer organisations across the project countries. Building on the legislative review and policy recommendations created towards the beginning of the project, advocacy plans were developed and implemented, governments and other related institutions were advocated towards and relationships with relevant actors were built.

National consumer organisations greatly expanded their knowledge in energy policy and developed expertise in effective advocacy work and both technical and political understanding of renewable energy and energy efficiency.

While legislation at the EU level has been ambitious, the review of implementation of the Clean Energy Package showed mixed ambition at the national level to fully transpose the Directives. Many barriers remain to fully engage consumers in the shift to renewable energy, which will be taken forward by the project partners in their work beyond the project's lifespan.