



Reports from the Technical Working Groups (Final)

Deliverable D4.2 of the BeSMART project

Responsible partner: Alliance for Energy Efficiency (AEE)

Version 1.0



This project has received funding from the European Union's Horizon 2020 research and innovation programme under grant agreement No 101033787.

The sole responsibility for the content of this publication lies with the authors. It does not necessarily reflect the opinion of the European Union. Neither CINEA nor the European Commission are responsible for any use that may be made of the information contained therein.

Contents

I. Introduction	3
II. Composition.....	3
III. Specification of Tasks.....	4
IV. Work Methodology.....	5
V. Outputs.....	6
Annex I – Policy Recommendations.....	11
Annex II - Internal acts of the AEE	51
Annex III - Meeting Minutes.....	53
Annex IV – External Report On the Status of TWGs	56

I. INTRODUCTION

The BeSmart project proposal is designed with the overall goal to develop the market for energy efficiency investment and support the national implementation of the Smart Finance for Smart Building initiative through establishing of a permanent discussion forum influencing all relevant policy actions in the area and actively involving the entire stakeholders' chain, maintaining a strong focus on financial institutions. To achieve this overarching goal, the project follows a straightforward methodology based on the concept of developing a shared knowledge based utilizing the previous experience from national and international activities of the participating organization and the major interested stakeholders, with the goal to develop specific policy recommendation for the design of the strategies and underlying financial support instruments in the area of energy efficiency. An integral part of the methodology is the establishment of Technical Working Groups (TWGs).

TWGs are formed around specific issues on which expert input is required within the discussion forum by the beneficiaries of the project – the institutions and actors responsible for the development of specific planning and financial instruments.

The present report from the TWGs includes information on the composition of the groups, specification of tasks, work methodology and outputs delivered.

II. COMPOSITION

TWGs were formed based on the key issues identified and duly documented in the proceedings of the first roundtables. The composition of the working groups was officially suggested and decided upon at the Steering Committee calls. Overall, a total of 19 members were dispersed in 4 technical working groups: 1) "Development of the ESCO market" – 5 members, 2) "Financial mechanisms and instruments promoting the development of the market of energy efficient services and renewable energy sources. Integration with the National Decarbonization Fund (NDF) and other enabling financial platforms" – 5 members, 3) "Recommendations to the National Recovery and Resilience Plan (NRRP) to achieve sustainable renovation of the building stock (residential and non-residential). Opportunities and challenges for the industrial sector" – 6 members, and 4) "Integrated policies for sustainable energy development" – 5 members. Structure and members of the TWGs were approved by the Management board of the Alliance for Energy Efficiency.

Following is the list of experts involved:

- Alexander Rangelov, Business Development Manager, Veolia
- Sevdalina Djabarska, Manager, Energy Saving
- Stanislava Dimova, Lawyer, Markova & Panchovska
- Ana Preshelkova, Financial Expert, Overgas
- Kiril Raytchev, Financial Expert, Econoler
- Marko Markov, Sustainable Energy Finance
- Hristo Valev, PMP, CFA, Partner, Urban Impact Ventures
- Blagovest Angelov, CEO, Energy Effect
- Ognian Markovski, Chief Expert EE/RE Finance Schemes, Sustainable Energy Development Agency
- Mihael Delijski, Manager, Energoeffect Consult
- Tsveta Naniova, CEO, Bulgarian-Austrian Consultant Company
- Zvezda Koshnicharova, Expert, Construction Chamber

- Vladislav Korchev, Expert in Economics, Overgas
- Georgi Bazadjiev, Expert in Ecology, Overgas
- Dragomir Tsanev, CEO, EnEffect
- Bozhil Kondev, Independent Consultant
- Denislava Damayanova, Expert in Ecology, Overgas
- Todor Popov, Legal Department Director, Municipality of Gabrovo
- Ivailo Tzekov, Financial Expert, National Trust Eco Fund

Some of the experts participate in more than one TWG.

At all stages, representatives of financial institutions actively collaborated with BeSmart TWGs, albeit not being members of any of them, by participating in the roundtables. One of the policy recommendations – “Development of a specialized ESCO segment under the National Decarbonization Fund (NDF)” – is an outcome of this type of interaction. The resulting policy was endorsed by the NDF consultant team.

Furthermore, there were intensive discussions with some of the speakers from financial institutions that have taken part in the roundtables so that we guarantee the positive acceptance of the policy recommendation in the sector.

The needs for changes in composition and structure of the groups, specification of tasks, expected outputs, and working methodology were discussed at each regular project meeting and interim calls, in a transparent way, taking into account the availability of necessary experts and the possibility to attract other interested stakeholders. The TWGs were periodically updated about the latest policy developments since many of their members personally participated in the meetings of the Committee on Energy Efficiency and Energy Poverty at the National Council for the EU Green deal.

Close cooperation with five municipalities was maintained during the BeSmart project to more thoroughly reflect the perspective of local authorities in the efforts invested by the TWGs. This included periodically collecting feedback on the developed policy recommendations, conducting on-site visits, and providing suggestions for specialized topics for discussion and similar activities.

III. SPECIFICATION OF TASKS

Following the specifications of the General agreement and proceedings from the completed roundtables, a long list of 29 potential topics for policy recommendations was prepared:

- Creation of a national interactive public ESCO register
- Update of Ordinance 16 (for ESCO) in the direction of:
 - (a.) term of 10 years to be allowed
 - (b.) to be synchronized with the instruction of Eurostat and the EIB
- Special treatment of VAT in ESCO contracts, i.e., option for delayed payment
- Creation of a database of projects with verified savings
 - (a.) benchmark for banks
- Introduction of quality control schemes (e.g., H2020 QualitEE)
 - (a.) ESCO companies – checks for implemented projects, achieved savings, customer feedback, qualified staff, financial stability

(b.) Energy audits - checking for feasibility, reliability, availability of essential attributes, absence of distortions, black box effect and similar topics

- Established Bulgarian Court practice for ESCO cases. Forfeiting.
- Tender procedures for ESCOs. Competitive dialogue.
- ESG and ESCO. Model upgrade directions. Proposal for policies.
- Demand/response solutions and ESCO. Model upgrade directions. Proposal for policies.
- Overview of ESCO programs in Central and Eastern Europe and proposals for replication in Bulgaria.
- Creation of a dedicated segment to the National Decarbonization Fund with the capacity to interact with innovative models for the implementation of EE/RES projects of the ESCO type
- Introduction of penalties in case of non-fulfillment of obligations stipulated in the Energy Efficiency Act
- Operationalization and successful market implementation of the Energy Efficiency Obligation Scheme (Art. 7/EED)
- Supporting the emergence of project aggregators. Mechanisms and policies. Changes in legislation.
- Policies to support energy communities and cooperatives
- Introduction of provisions that ease the financial burden of home-owners in the Resilience and Recovery Plan. Phase II of the program for renovation of multifamily residential buildings
- Road map for renovation of multi-family residential buildings
- Recommendations for changes in the Condominium Act
 - (a.) opportunity for collective loans
 - (b.) mechanism for enforcement of responsibilities to owners, decision-making (c.) opening of a condominium bank account
- Models based on public-private partnership.
- Smart buildings. Indicators. Transposition of the Buildings Directive (EPBD)
- Changes in regulation that facilitate On-bill/On-tax financing
- Continuation of the national strategy for NZEB (near zero energy buildings)
- Policies to reduce energy poverty
- Raising awareness of the additional (non-financial) benefits of energy efficiency
- Establishment of energy management systems in the municipal building stock and public infrastructure
- Communication strategies to support the renovation of the building stock
- Design of operational programmes, and more specifically, on the continuation of the “Regions in Growth” and “Competitiveness” Operational Programme, targeted to utilize the leverage potential of the public resources
- National long-term energy and climate strategy and integrated national energy and climate plan (Art. 15/Regulation 2018/1999) and/or Integrated national energy and climate progress reports (Art. 17/Regulation 2018/1999) – as applicable
- Integration with other relevant financial instruments, focused, but not limited to the Urban Development Fund, the “Environment” Operational Programme, and utilization of end-use heating subsidies and the resources invested in air quality improvement

IV. WORK METHODOLOGY

TWGs' efforts and topics of discussion were mainly guided by (i) key points collected from the roundtable presentations, (ii) parallel formal and informal exchanges of information happening alongside the roundtable events, and (iii) outputs from the roundtable proceedings. Besides the members of the TWGs, a wider knowledge base of professionals was established during the course of the project, forming an “extended” working group, comprising partners from financial institutions, local authorities, and the central government.

In reference to the TWGs themselves, a lead was appointed to each one, acting as a point of contact as well as supervising the group’s activities. Leads were selected to possess a high level of expertise and long experience in the respective segment of the technical working group. Communication within and among the groups took place by email, phone calls, online meetings, etc. Some of the more important meetings, e.g., when policy recommendations were approved and/or presented, were documented in meeting minutes.

V. OUTPUTS

Under the BeSmart projects, a long list of 29 potential topics for policy recommendations was prepared, out of which 10 were delivered: 1) Establishing of interactive national ESCO register; 2) Creation of a working segment to the NDF with the capacity to interact with innovative models for the implementation of EE/RES projects of the ESCO type; 3) Introduction of regulations that ease the financial burden on the citizens when programming the NRRP in the project for renovation of multifamily residential buildings; 4) National roadmap for renovation of the multifamily residential buildings; 5) ESCO programmes with subsidies - best practices from Central and Eastern Europe and recommendations for Bulgaria; 6) UPDATE OF ORDINANCE 16-347 of 2009 (The ESCO ORDINANCE) – Introduction of best EU practices; 7) Proposal to Upgrade the Envisaged ESCO mechanism in NRRF STAGE II - Concept for a pilot ESCO programme; 8) Upgrading and Improving the National Policy and Regulatory Framework for Energy Communities; 9) Alignment of EE projects with the international framework for investments with social impact; 10) Establishment of a permanent renovation program for residential buildings /without a 100% grant component/.

The policy recommendations were presented at BeSmart roundtables and already published as either individual publications or parts of common statements, declarations and/or contributions to the public consultations procedures related to the reforms and investments projects under the NRRP. It should be noted that policy recommendation #3 was adopted by phase II of the program for renovation of multifamily buildings under the NRRP. Some of the policy recommendations were developed in collaboration with other H2020 projects: FinEERGo-Dom project supported the development of policy recommendation #7, POWER-E-COMM and SHARES projects – policy recommendation #8, and SER project - policy recommendation #9.

Key statistics of the effort delivered by BeSmart TWGs can be seen in the figure below:

- **4 / # Workgroups**
- **19 / # Experts**
- **29 / # Suggestions for policy recommendations**
- **10 /# Developed policy recommendations**
- **7 / # Cross workgroup meetings**
- **5 / # Active cooperations with municipalities**



The process of endorsement of developed policy recommendations is presented in the table below:

Table 1: Discussion & Endorsement Process

Policy Recommendation	Link on website	WG involved	Process / in which RT the topic was discussed / will be discussed	Endorsement process
<i>Establishing an interactive national ESCO register</i>	link	WG1	(1) Discussed at Management Board meeting of the AEE (30.08.2022) (2) Discussed at cross WGs meeting (22.09.2022) Discussed at Gabrovo RT (26-27.09.2022)	Approval was sought from: (1) Management Board of the AEE; (2) Cross-WGs meeting; (3) BeSmart Consortium; (4) Gabrovo RT (26-27.09.2022)
<i>Creation of a working segment to the NDF with the capacity to interact with innovative models for the implementation of EE/RED projects of the ESCO type</i>	link	WG2	(1) Discussed at Management Board meeting of the AEE (30.08.2022) (2) Discussed with the NDF consultant (3) Discussed at cross WGs meeting (22.09.2022) (4) Discussed at Gabrovo RT (26-27.09.2022)	Approval was sought from: (1) Management Board of the AEE; (2) NDF Consultant; (3) Cross-WGs meeting; (4) BeSmart Consortium; (5) Gabrovo RT (26-27.09.2022)
<i>Introduction of regulations that ease the financial burden on the citizen when programming the NRRP in the project for renovation of multi-family residential buildings</i>	link	WG3	(1) Discussed at Management Board meeting of the AEE (30.08.2022) (2) Discussed at cross WGs meeting (22.09.2022) (3) Discussed at Gabrovo RT (26-27.09.2022) (4) Put to public discussion with the Ministry of Regional Development and Public Works (NRRP - Residential Buildings Program - Phase II)	Approval was sought from: (1) Management Board of the AEE; (2) Cross-WGs meeting; (3) BeSmart Consortium; (4) Gabrovo RT (26-27.09.2022)

<i>National roadmap for renovation of multifamily residential buildings</i>	link	WG3	(1) Discussed at cross WGs meeting (22.09.2022) (2) Discussed at Gabrovo RT (26-27.09.2022)	Approval was sought from: (1) Cross-WGs meeting; (2) BeSmart Consortium; (3) Gabrovo RT (26-27.09.2022)
<i>ESCO programmes with subsidies - best practices from Central and Eastern Europe and recommendations for Bulgaria</i>	link	WG1	(1) Discussed at cross WGs meeting (29.09.2023); (2) Discussed at Sofia RT (05.10.2023)	Approval was sought from: (1) The Ministry of Regional Development and Public Works (MRDPW); (2) Municipality of Burgas
<i>UPDATE OF ORDINANCE 16-347 of 2009 (The ESCO ORDINANCE) – Introduction of best EU practices</i>	link	WG1	(1) Discussed at cross WGs meeting (15.11.2023); (2) Discussed at Sofia RT (27.11.2023)	Approval was sought from: (1) The Sustainable Energy Development Agency; (2) Municipality of Gabrovo; (3) Municipality of Sofia; (4) The Chamber of Energy Auditors
<i>Proposal to Upgrade the Envisaged ESCO mechanism in NRRF STAGE II - Concept for a pilot ESCO programme</i>	link	WG1	(1) Discussed at cross WGs meeting (19.01.2024); (2) Discussed at Sofia RT (30.01.2024)	Approval was sought from: (1) The Ministry of Regional Development and Public Works (MRDPW); (2) Municipality of Burgas; (3) Municipality of Gabrovo
<i>Upgrading and Improving the National Policy and Regulatory Framework for Energy Communities</i>	link	WG2	(1) Discussed at cross WGs meeting (17.04.2024); (2) Discussed at Chiflika RT (24.04.2024)	Approval was sought from: (1) Municipality of Stara Zagora (2) Municipality of Pernik; (3) Municipality of Gabrovo
<i>Alignment of EE projects with the international framework for investments with social impact</i>	link	WG3	(1) Discussed at cross WGs meeting (17.04.2024); (2) Discussed at Chiflika RT (24.04.2024)	Approval was sought from: (1) Municipality of Stara Zagora (2) Municipality of Pernik; (3) Municipality of Gabrovo



<i>Establishment of a permanent renovation program for residential buildings /without a 100% grant component/</i>	link	WG3	(1) Discussed at cross meeting (17.04.2024); Discussed at Chiflika (24.04.2024)	WGs (2) RT Approval was sought from: (1) Municipality of Stara Zagora (2) Municipality of Pernik; (3) Municipality of Gabrovo
---	----------------------	-----	--	---

In addition to the policy recommendations, the following outputs were produced and shared: (i) Internal Act of the AEE (28.01.2022), (ii) Internal Act of the AEE (30.08.2022), (iii) List with Policy Recommendations, (iv) Meeting Minutes (28.02.2022), (v) Meeting Minutes (27.05.2022), (vi) Meeting Minutes (21.09.2022), (vii) External Report on the Status of the TWGs; (viii) Meeting Minutes (29.09.2023); (ix) Meeting Minutes (15.11.2023); (x) Meeting Minutes (19.01.2024); and (xi) Meeting Minutes (17.04.2024) (See Annexes).

ANNEX I – POLICY RECOMMENDATIONS



Alliance for Energy Efficiency



Work Group I:

Development of the ESCO market

Policy Recommendation (1)

Creation of a national interactive public ESCO register

Summary

Enabling the entry of innovative ESCO business models in the field of energy efficiency at a regional and national level by creating and providing reliable and systematized information about key characteristics of active ESCO companies (EE service providers), ESCO facilitators, quality indicators of ESCO projects (including ESG), as well as ESCO-compatible financial instruments, to potential beneficiaries. In order to support ESCO companies covering the adopted assessment criteria at a company and/or project level to a maximum extent, a capacity building toolkit should be developed (for example: checklists / road maps / online simulation models / training modules, etc.) to be used by interested ESCOs.

An effective approach to accelerating the pace of decarbonization of the economy can be applied by expanding the provision of turnkey EE services such as the ESCO/EnPC. The advantage is that a number of complex services are offered in a package, including energy survey, solution design, financing, maintenance, guarantee of the achieved energy savings and the like, which leads to shortened implementation periods, excellent integration among key project activities, and optimal costs for the beneficiaries. Unfortunately, practice shows that the structuring of complex projects and services remains a difficulty for specialized energy efficiency companies, which leads to disappointments among the beneficiaries and losses for the participants in the process - financial institutions, ESCO companies, subcontractors.

In response to the above-mentioned challenges, the interactive national ESCO register (INER) will systematize and provide in an easily understandable and accessible way to potential beneficiaries information on the capacity of ESCO companies, ESCO facilitators, quality characteristics of completed ESCO projects, compatible with ESCO financial instruments. In this way, beneficiaries will be able to make informed choices and potential reputational damage to EE service providers will be avoided.

At the same time, the ESCO companies will have the opportunity to increase their capacity and the quality of the services they provide by using the developed toolkit for the needs of INER and certify

Sofia, 1000, 3. "Tzar Shishman", entr. B, mob: +359 888 615358,
mail: office@alliance-ee.bg, web: <http://alliance-ee.bg>



this by being registered in it. Examples of criteria at the ESCO company level can be the presence of energy auditors, project managers, financiers, quality control specialists, financial stability of the company and the like. For its part, the INER toolkit will include training and certification modules in key areas: (i) structuring of complex ESCO projects (including financing), (ii) quality control and management, (iii) control and management of the risk.

A similar approach for certification will be developed at a project level. Key quality criteria will be registered in INER, as well as tools for their control and improvement will be developed: (i) quality control checklists (e.g., maintenance, measurement and verification of savings), (ii) optimal choice of financial instrument and financial modelling, (iii) validity of contractual clauses / reciprocity, (iv) ESG outcomes for the beneficiary, such as ensuring a safe and healthy working environment for staff and the like.

In the process of creating INER, the foundations will be laid for the replication of the platform in countries that follow the trajectory of development in Bulgaria, such as North Macedonia, Serbia, Albania, Kosovo. The transfer of technology and knowledge can take place as a follow-up phase to the current policy proposal.



About the BeSmart project

Bulgarian Energy Efficiency Forum on Smart Finance for Smart Buildings:

The transition to a low carbon economy requires higher levels of energy efficiency and better energy management, the entry of new specialised services and the development of appropriate financing mechanisms. This challenge is relevant particularly in the Bulgarian buildings sector, where the current 100% grant mechanism for the renovation of multi-family residential buildings needs to be reformed into a more sustainable financing scheme that is socially permeable, ensures the participation of vulnerable consumers and at the same time sets higher benchmarks for energy efficiency and environmental benefits.

What is our aim?

The aim of BeSMART is to create a permanent discussion forum for joint policy development and the structuring of innovative financing schemes to stimulate investment in energy efficiency. In this respect, the project foresees the following activities:

- Involving all stakeholders in an open dialogue
- Dissemination of good practices, initiatives and tools
- Building an online communication platform for knowledge sharing and experience
- Conducting 9 national roundtables with wide media coverage



Alliance for Energy Efficiency



- Concrete recommendations for the development of financial instruments to support energy efficiency

How will we get there?

- Involving all stakeholders in an open dialogue
- By disseminating good practices, initiatives and tools
- By building an online communication platform to share knowledge and experiences
- By holding nine national roundtables with wide media coverage
- With concrete recommendations for the development of financial instruments to support energy efficiency

Main benefits:

- Active participation and first-hand information on the design of new financial schemes for energy efficiency
- Increased potential to develop and manage deep energy-efficient building renovation projects
- Support for local 2030 Sustainable Energy and Climate Plans and building renovation strategies
- Momentum in the push towards a more attractive and accessible urban environments, reduced energy poverty and better air quality.



This project has received funding from the European Union's Horizon 2020 research and innovation programme under grant agreement No 101033787

Sofia, 1000, 3. "Tzar Shishman", entr. B, mob: +359 888 615358,
mail: office@alliance-ee.bg, web: <http://alliance-ee.bg>



Work Group II:

Financial mechanisms and instruments promoting the market development of energy efficiency services (EES) and renewable energy sources (RES).
Integration with the National Decarbonization Fund (NDF) and other enabling financial platforms

Policy Recommendation (1)

Creation of a dedicated segment under the NDF with the capacity to support ESCO-type innovative models for implementation of EE/RES projects

Summary

The ability to support innovative business models in EE and RES requires specialized expertise and knowledge to be present in financial institutions based on which they can effectively develop and offer adequate financial services. In Bulgaria, there is accumulated experience in providing financial services to integrated EE projects. That can be easily upgraded and consolidated as an ESCO segment under the NDF. Considering the complexity of the ESCO projects, the NDF can also play the role of an orchestrator and a standardizing agent, according to which other market participants - providers of energy efficiency services, facilitators, consultants, and public customers - should be aligned. In this way, the emergence of a single and standardized market for EE/RES projects, key to attracting private capital for the transformation needs of the Bulgarian economy, would be greatly alleviated.

Thanks mainly to the Bulgarian Energy Efficiency Fund (BEEF), there is a long history of financial support for the ESCO model in Bulgaria. On this strong foundation, the NDF can build on and avoid same mistakes. A mandatory prerequisite for the ESCO mechanism to develop in a sustainable way, as well as to benefit from potential new instruments provided from the NDF, is that the coming grant schemes and subsidies are competently programmed. In other words, any possibilities for competition with market mechanisms in the face of ESCO and/or financial instruments should be prevented. Just the opposite, managing authorities should program and require grants to be blended with ESCOs (or other financial instruments). Unfortunately, the experience of recent years has been exactly the opposite. As a result, market-based schemes such as ESCO has been effectively eliminated from the market. In addition, beneficiaries have been encouraged to apply or wait for opening of new programs with 100% subsidy.

At a minimum, the NDF can further enhance the ESCO support that BEEF already provides by:

- Offering preferential discount rates for buying of receivables under ESCO contracts;



Alliance for Energy Efficiency



- Accepting energy savings, i.e., costs saved from energy supply, as collateral, instead of land, mortgage, and the like;
- Allowing longer credit terms, for example 15-20 years, in order to minimize the payments from the beneficiaries and make the loan more accessible;
- Insuring the receivables of ESCO companies, providing protection of their cash flows in case of missed payments from their clients.

There is ample room for action that can be taken by the NDF to support and further develop the ESCO business model. For example, the NDF can offer partnerships to public and private beneficiaries and lead them on their way to implement the ESCO approach throughout the project cycle, which includes:

- Beneficiaries could have at their disposal a registry of pre-qualified ESCO companies with proven experience and a portfolio of qualified projects. The NDF in cooperation with the ESCO sector can establish a minimum set of standards to be covered and registered;
- Beneficiaries could benefit from quality assurance schemes that may be adopted by the NDF to ensure the achievement of high-end project results (e.g., QualitEE project under H2020);
- The NDF can manage the public procurement process, which is more complicated in the case of ESCO. Prerequisites must be created for ESCO companies to compete on the level of EE technical solution, amount of energy saved, and costs throughout the life cycle instead of just costs for implementation of already prescribed EE measures;
- In cases of public beneficiaries and energy cooperatives, the NDF can aggregate more buildings in a single ESCO procedure, which can produce economies of scale and the inclusion of mini-grid solutions based on renewable energy sources.

The proposed approach will protect beneficiaries from making mistakes and taking wrong steps, which potentially can undermine confidence in the ESCO model. Although the value and advantages of EnPCs are clear to the beneficiaries - investments against savings, ESCO requires a wide range of expertise to make possible the successful implementation of this type of projects. Special care should be taken that capacity for delivery of integrated EE services on the market continues to emerge and develop.

Sofia, 1000, 3 "Tzar Shishman" str., entr..B, mob: +359 888 615358,
mail: office@alliance-ee.bg, web: <http://alliance-ee.bg>



About the BeSmart project

Bulgarian Energy Efficiency Forum on Smart Finance for Smart Buildings:

The transition to a low carbon economy requires higher levels of energy efficiency and better energy management, the entry of new specialised services and the development of appropriate financing mechanisms. This challenge is relevant particularly in the Bulgarian buildings sector, where the current 100% grant mechanism for the renovation of multi-family residential buildings needs to be reformed into a more sustainable financing scheme that is socially permeable, ensures the participation of vulnerable consumers and at the same time sets higher benchmarks for energy efficiency and environmental benefits.

What is our aim?

The aim of BeSMART is to create a permanent discussion forum for joint policy development and the structuring of innovative financing schemes to stimulate investment in energy efficiency. In this respect, the project foresees the following activities:

- Involving all stakeholders in an open dialogue
- Dissemination of good practices, initiatives and tools
- Building an online communication platform for knowledge sharing and experience
- Conducting 9 national roundtables with wide media coverage
- Concrete recommendations for the development of financial instruments to support energy efficiency

How will we get there?

- Involving all stakeholders in an open dialogue
- By disseminating good practices, initiatives and tools
- By building an online communication platform to share knowledge and experiences
- By holding nine national roundtables with wide media coverage
- With concrete recommendations for the development of financial instruments to support energy efficiency

Main benefits:

- Active participation and first-hand information on the design of new financial schemes for energy efficiency
- Increased potential to develop and manage deep energy-efficient building renovation projects



Alliance for Energy Efficiency



- Support for local 2030 Sustainable Energy and Climate Plans and building renovation strategies
- Momentum in the push towards a more attractive and accessible urban environments, reduced energy poverty and better air quality.



This project has received funding from the European Union's Horizon 2020 research and innovation programme under grant agreement No 101033787

Sofia, 1000, 3 "Tzar Shishman" str., entr. B, mob: +359 888 615358,
mail: office@alliance-ee.bg, web: <http://alliance-ee.bg>



Work Group III:

Recommendations for improvements to the National Resilience and Recovery Plan (NRRP). Sustainable renovation of the building stock (residential and non-residential). Opportunities and challenges facing the industrial sector

Policy Recommendation (1)

Programing NRRP to minimize financial burden of multifamily building (MFB) renovation for home-owners

Summary

The NRRP is not clear whether the feasibility studies (energy survey, technical design, etc.) will be subsidized, and at what stage or in what amount, if such funding is provided. The latter creates a prerequisite for delays in the utilization of the funds earmarked in the NRRP for renovation of MFB. As a possible solution, the ESCO financing mechanism can be used. It covers by default the costs of required feasibility studies and thus facilitates condominiums in finding permanent or temporary financing for this type of activity.

The ESCO financing mechanism has been reflected as an eligible option in the NRRP for the case of renovation of MFB, along with other financial instruments. What makes the ESCO model superior to other financing methods are the additional benefits for the beneficiaries, such as:

- Conducting a pre-feasibility study without any financial expense for the beneficiary at this stage;
- Implementing energy-saving measures (ESM) without any payments from the beneficiary at this stage;
- Guaranteeing the anticipated energy savings after the implementation of the ESMs for the duration of the EnPC. The amount of savings is at least commensurate with the monthly payments by the beneficiary to the ESCO company. This is the only financial commitment for the beneficiary under the EnPC. It ends when the investment of the ESCO company is fully repaid;
- Constant monitoring and verification of energy savings achieved.



Taking into account the abovementioned advantages, the ESCO mechanism can support the intensification of projects implementation in the residential sector under the NRRP. The NRRP foresees the investments to be disbursed in two phases – with 100% subsidy and with 80% subsidy.

Support for the first phase of renovation of MFB - 100% grant for the implementation of ESM

The ESCO company conducts all required feasibility studies at its own expense after its selection as a contractor, according to a regulated procedure for selection of a contractor. With the prepared documentation, the condominium and the ESCO company apply for financing to the public authorities that manage the program under the NRRP. Upon approval, an ESCO contract is signed and implementation proceeds. After the implementation of ESMs, the ESCO company guarantees the achievement of anticipated energy savings, which ensures a sustainable spending of public resources and a real economic effect for apartment owners.

Support for the second phase of renovation of MFB - 80% grant for the implementation of the ESM

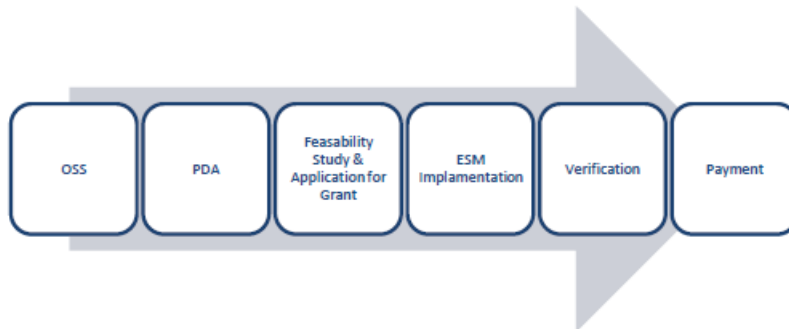
The process is similar as in the first phase, but with the addition that the ESCO company also co-finances 20%, which is necessary for the implementation of the ESMs. In this way, the problem for the beneficiaries in relation to financing the energy survey, technical design and 20% contribution is solved. The commitment for home-owners to make payments comes after the realization of the ESM, during the period of guaranteed energy savings. At this stage, home-owners will have enough financial resource due to less expenses for energy supply.

Recommendations for introduction of the ESCO mechanism to potential beneficiaries

The opportunity for condominiums to benefit from the advantages of the ESCO mechanism should be offered by the one-stop-shops (OSSs), which are planned to be established in connection with the implementation of the NRRP in the MFB segment. Given the need to follow the Public Procurement Act and potentially organized by the OSSs, the selection of an ESCO company can be made on the basis of the best offer, which includes (i) the amount of guaranteed energy savings, (ii) the percentage of savings that remains for the benefit of the households (upon payment of 20 % to the ESCO company), (iii) amount of required investment, (iv) types of ESMs and (v) contract duration. The company with the best technical and financial parameters will be given the right to sign an agreement for project development (PDA). Based on the PDA, the ESCO company will start investing funds and efforts to create required project documentation and a project application for financing under the NRRP. Alternatively, similar to the practice in other EU countries, the subsidy can be granted to the ESCO company / condominium after verification of the achieved savings and establishment of their compliance with those stipulated in the EnPC.



Figure 1: ESCO model & NRRP



About the BeSmart project

Bulgarian Energy Efficiency Forum on Smart Finance for Smart Buildings:

The transition to a low carbon economy requires higher levels of energy efficiency and better energy management, the entry of new specialised services and the development of appropriate financing mechanisms. This challenge is relevant particularly in the Bulgarian buildings sector, where the current 100% grant mechanism for the renovation of multi-family residential buildings needs to be reformed into a more sustainable financing scheme that is socially permeable, ensures the participation of vulnerable consumers and at the same time sets higher benchmarks for energy efficiency and environmental benefits.

What is our aim?

The aim of BeSMART is to create a permanent discussion forum for joint policy development and the structuring of innovative financing schemes to stimulate investment in energy efficiency. In this respect, the project foresees the following activities:

- Involving all stakeholders in an open dialogue
- Dissemination of good practices, initiatives and tools
- Building an online communication platform for knowledge sharing and experience
- Conducting 9 national roundtables with wide media coverage
- Concrete recommendations for the development of financial instruments to support energy efficiency

Sofia, 1000, 3 "Tsar Shishman" str., entr.B, mob: +359 888 615358,
mail: office@alliance-ee.bg, web: <http://alliance-ee.bg>



Alliance for Energy Efficiency



How will we get there?

- Involving all stakeholders in an open dialogue
- By disseminating good practices, initiatives and tools
- By building an online communication platform to share knowledge and experiences
- By holding nine national roundtables with wide media coverage
- With concrete recommendations for the development of financial instruments to support energy efficiency

Main benefits:

- Active participation and first-hand information on the design of new financial schemes for energy efficiency
- Increased potential to develop and manage deep energy-efficient building renovation projects
- Support for local 2030 Sustainable Energy and Climate Plans and building renovation strategies
- Momentum in the push towards a more attractive and accessible urban environments, reduced energy poverty and better air quality.



This project has received funding from the European Union's Horizon 2020 research and innovation programme under grant agreement No 101033787

Sofia, 1000, 3 "Tsar Shishman" str., entr.B, mob: +359 888 615358,
mail: office@alliance-ee.bg, web: <http://alliance-ee.bg>



Work Group III:

Recommendations for improvements to the National Resilience and Recovery Plan (NRRP). Sustainable renovation of the building stock (residential and non-residential). Opportunities and challenges facing the industrial sector

Policy Recommendation (2)

Roadmap for renovation of multi-family buildings

Summary

In order to achieve the level of ambition set in the Long-term renovation strategy for renovation of the building stock till 2050 (LTRS), it is urgent to optimize and upgrade the financing mechanism foreseen in the National Resilience and Recover Plan (NRRP). Activating private capital, ending the unsustainable practices of 100% grant financing, introducing a collection of financial instruments, as well as conducting effective communication leading to a high degree of commitment of the beneficiaries, are among the changes that would lead to the successful achievement of national goals.

The national goals for building renovation, set in the LTRS, many times exceed what has been achieved so far in terms of scope, investment, and energy savings. In addition, the envisaged funding model defined in the NRRP does not correspond to the level of ambition adopted in the strategy because:

- with a national goal of renovation by 2030 of 19,026,656 m² of living space, taking into account the prices and approach set in the plan, in the best-case scenario, by the middle of 2026, just 3,688,979 m² will be renovated;
- only 1,135 buildings out of 64,056 that need to be renovated will be covered within the framework of the NRRP under the established mechanism;
- an opportunity is lost to activate a huge amount of private resources to help grow the local and national economy. What's more, the capital raised should be at least four times the subsidy.

The adopted by the NRRP financing scheme needs to be optimized and upgraded in the following directions:



- discontinuation of the practice for 100% grant financing, which leads otherwise to unjustified expectations from the state and municipalities, irresponsibility on the part of the homeowners, and total lack of care to maintain the renovated buildings;
- reduction of public funding after the implementation of NRRP sub-project 9a by 2.25% on an annual basis;
- allocation of 7% of public funds for monitoring, communication, training, and scientific research;
- preservation of 100% grant financing of energy poor households;
- gradual reduction of the subsidy from 100% to 20% by 2030.

Considering that there will be no interruptions in funding and that the suggested approach hereinabove is adopted, the following results can be achieved by 2030:

- 19,033,804 m² of renovated area (achieved goal in the LTRS);
- 5,857 renovated multi-family residential buildings with 254,633 dwellings and at least 29,283 households brought out of energy poverty;
- BGN 1,929,700,145 (approx. EUR 986,624,884) attracted private investments with BGN 2,185,781,533 (approx. EUR 1,117,555,209) public resources invested until 2030.

A MUST HAVE FINANCIAL MECHANISMS

Market enforcement of the suggested approach is unthinkable without the existence of a number of financial mechanisms. With the aim of both the immediate implementation of the activities under Work Package 2 of the NRRP sub-project 9a, as well as the sustainable continuation of policies and the achievement of national goals, it is necessary to ensure availability of the following:

- Specialized state provided revolving/guarantee fund;
- Specialized credit lines from commercial banks;
- Specialized municipal provided revolving/guarantee funds for energy efficiency;
- On-bill financing;
- On-tax financing;
- Financing through the ESCO mechanism.

TENTATIVE ROADMAP

2022	2023-2024	2025	2026-2029	2030
Financial Mechanisms				
BGN 225,980,000 with 80% Grant (total investment: BGN 249,029,960)	BGN 451,960,000 with 70%/60% Grant (total investment: BGN 559,809,923)	BGN 225,980,000 with 50% Grant (total investment: BGN 337,510,208)	BGN 854,205,711 with Grant that decrease to 25% intensity (total	BGN 201,675,821 with 20% Grant

Sofia, 1000, 3 "Tsar Shishman", entr. B, mob: +359 888 615358, mail: office@alliance-ee.bg, web: <http://alliance-ee.bg>



			investment: BGN 1,970,785,235	(total investment: 642,200,352)
Concessional loans to cover co-financing requirements for homeowners		Targeted concessional loans. Special loans from commercial banks with guarantees provided by the National Decarbonization Fund and the like	Higher requirements for targeted loans. Special loans from commercial banks with guarantees provided by the National Decarbonization Fund and the like	
100% subsidy for energy poor households				
	Those who achieve energy class A, get 80%/70% grant (additional resource). Construction and energy survey are financed by homeowners	Those who achieve energy class B, get 60% grant (additional resource).	Those who achieve energy class A and invest in RES, get a higher grant component (additional resource).	Those who achieve energy class A and invest in RES, get a higher grant component (additional resource).
Changes in legislation				
Changes in the Condominium Act, allowing for taking a decision for renovation in an easier way, regulation of facility management, and possibility of opening a bank account with the purpose of obtaining a credit guarantee.	Making professional facility management compulsory for condominiums.		Introduction of penalties if professional facility management has not been adopted, and/or renovation roadmap has not been implemented, etc.	
Changes to allow for On-bill financing and On-tax financing.	Improvements in certificates for energy characteristics, introduction of renovation roadmaps, and digital diaries.		Introduction of requirements for projects' carbon footprint	
Changes to allow combination of EnPC and energy supply	Tax reductions for renovated properties.			



Changes to make green procurement compulsory.	Compulsory trainings for public procurement contractors.			
Definition of a mandatory minimum energy class, i.e., "B"				
Quality control, capacity building, and communication				
Verification of at least 10% of the energy audits. Introduction of penalties in cases of infringements.	Verification of at least 5% of the energy audits. Introduction of penalties in cases of infringements.			
Independent construction quality control of at least 10% of the projects. Introduction of penalties in cases of infringements.	Independent construction quality control of at least 5% of the projects. Introduction of penalties in cases of infringements.			
Communication campaign at national and regional level				
Trainings for energy auditors, installers, construction workers, beneficiaries, etc.				
Certification of companies offering one-stop-shop services				
		Monitoring of energy savings, introduction of penalties in cases anticipated savings have not been achieved.		
	Introduction of digital diaries			

Source: Roadmap for renovation of residential buildings, EnEffect



About the BeSmart project

Bulgarian Energy Efficiency Forum on Smart Finance for Smart Buildings:

The transition to a low carbon economy requires higher levels of energy efficiency and better energy management, the entry of new specialised services and the development of appropriate financing mechanisms. This challenge is relevant particularly in the Bulgarian buildings sector, where the current 100% grant mechanism for the renovation of multi-family residential buildings needs to be reformed into a more sustainable financing scheme that is socially permeable, ensures the participation of vulnerable consumers and at the same time sets higher benchmarks for energy efficiency and environmental benefits.

What is our aim?

Sofia, 1000, 3 "Tsar Shishman", entr. B, mob: +359 888 615358,
mail: office@alliance-ee.bg, web: <http://alliance-ee.bg>



Alliance for Energy Efficiency



The aim of BeSMART is to create a permanent discussion forum for joint policy development and the structuring of innovative financing schemes to stimulate investment in energy efficiency. In this respect, the project foresees the following activities:

- Involving all stakeholders in an open dialogue
- Dissemination of good practices, initiatives and tools
- Building an online communication platform for knowledge sharing and experience
- Conducting 9 national roundtables with wide media coverage
- Concrete recommendations for the development of financial instruments to support energy efficiency

How will we get there?

- Involving all stakeholders in an open dialogue
- By disseminating good practices, initiatives and tools
- By building an online communication platform to share knowledge and experiences
- By holding nine national roundtables with wide media coverage
- With concrete recommendations for the development of financial instruments to support energy efficiency

Main benefits:

- Active participation and first-hand information on the design of new financial schemes for energy efficiency
- Increased potential to develop and manage deep energy-efficient building renovation projects
- Support for local 2030 Sustainable Energy and Climate Plans and building renovation strategies
- Momentum in the push towards a more attractive and accessible urban environments, reduced energy poverty and better air quality.



This project has received funding from the European Union's Horizon 2020 research and innovation programme under grant agreement No 101033787

Sofia, 1000, 3 "Tsar Shishman", entr. B, mob: +359 888 615358,
mail: office@alliance-ee.bg, web: <http://alliance-ee.bg>



ALLIANCE ABOUT ENERGY EFFICIENCY



Working Group I:

Development of the ESCO market

ESCO PROGRAMMES WITH SUBSIDIES

Best practices from Central and Eastern Europe: Czech Republic, Poland, Latvia. Focus on multi-family residential buildings.

Summary

The use of integrated and innovative business models for accelerated implementation of energy-saving measures within national and regional programs is an undeveloped opportunity in Bulgaria, unlike several countries with which we have compared ourselves over the years. To highlight successful practices in the EU that are easy to replicate to achieve the set national and regional goals, existing programs in the Czech Republic, Latvia, and Poland are examined. The common aspect in all three cases is that they manage to combine an EU subsidy with the provision of an ESCO service to the final beneficiaries (development of a candidate project, energy audit, design, implementation, economy, insurance, operation, and maintenance "one-stop-shop"). There are several main specifics that stand out when structuring the processes in the reviewed programs: (i) the admission to participation of energy efficiency (EE) service providers that provide combined one-stop-shop services, (ii) the existence of prior subsidy approval which provides assurance during the initial stage of implementation of EE projects in the main participants – banks, beneficiaries, EE service providers, managing EU funds, national and regional units, (iii) the existence of a package of standardized contracts, including tripartite ones, to be used by program participants to ensure clear and transparent synchronization throughout the process, (iv) amounts of subsidies that do not distort participants' market behavior, and (v) additional incentives with higher ambition to save and verify energy savings after one year.

G. Sofia, P.O. Box 1000, ul. "Tsar Shishman" No3, entr. B, mobile: +359 888 615358,
E-mail: office@alliance-ee.bg, Website: <http://alliance-ee.bg>



Content:

I. Czech Republic	3
1. Participants	3
2. Key points in the implementation of the program	3
3. Documents available	5
4. Recommendations for Bulgaria	5
II. Latvia	5
1. Participants	5
2. Key points in the implementation of the program	5
3. Documents available	7
4. Recommendations for Bulgaria	7
III. Poland	8
1. Participants	8
2. Key points in the implementation of the program	9
3. Documents available	10
4. Recommendations for Bulgaria	11

Figures:

Figure 1: Sequence of processes in the Czech Republic	4
Figure 2: General scheme of the programme in the Czech Republic	4
Figure 3: General scheme of the programme in Latvia	7
Figure 4: General scheme of the programme in Poland	9
Figure 5: Sequence of processes in Poland	10



I. Czech Republic

1. Participants

The current program includes the following participants:

- Ministry of the Environment
- National Fund for Environmental Protection
- Operational Programme "Environmental Protection"
- ESCOs
- Banks

Although beneficiaries of the program are public entities (hospitals, etc.), the provisions used can be borrowed for the conditions in Bulgaria.

2. Key Points in the implementation of the Program

The program includes the following steps:

Step 1: Preliminary analysis

Step 2: Submit an applicant project for a subsidy

- Energy audit
- Readiness of the project at conceptual level (conceptual phase)
- Declaration of use of ESCO contract by beneficiary

Step 3: Conduct a tender procedure

- Use of the "Competitive Dialogue" form
- The amount of the subsidy is fixed

Step 4: Improvements in project indicators after evaluation by the ESCO trap

- Annex with improved parameters
- Improved Energy Audit

Step 5: Optimization of the budget within the subsidy

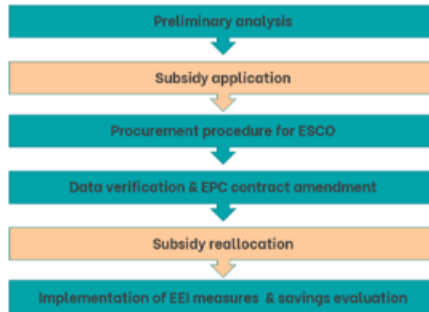
- Final Candidate Project
- Tripartite contract between ESCO, client, bank for purchase of receivables
- Annex with improved parameters
- Improved Energy Audit
- Summary table of improvements (differences between preliminary application and final)

Step 6: Implementation of the project



Figure 1: Sequence of processes in the Czech Republic

EPC PROCESS WITH SUBSIDIES



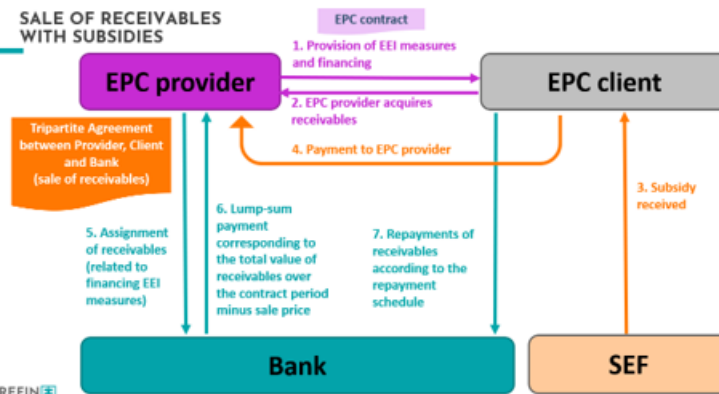
REFIN

Source: REFINE

The interrelations between the individual participants can be traced in the lower figure. One of the main tasks achieved in such a structured scheme is that it satisfies the grantor's (SEF) requirement that the expenditure has been incurred by the beneficiary before the specified part is recovered. This is what is achieved through the conclusion of the tripartite treaty.

Figure 2: General scheme of the programme in the Czech Republic

SALE OF RECEIVABLES WITH SUBSIDIES



REFIN

Source: REFINE



3. Documents Available

The following documents are available for use/adaptation:

- Declaration of use of ESCO contract by beneficiary
- Summary table of improvements (differences between preliminary application and final)
- Tripartite contract between ESCO, client, bank for purchase of receivables

4. Recommendations for Bulgaria

The following good practices from the Czech Republic could be borrowed for the needs of programming subsidies with ESCOs in Bulgaria:

- Preliminary framework approval of a candidate project and subsequent one to allow reshuffling / optimization / improvements of the investment.
 - In this way, the ESCO company has the opportunity to offer better solutions than the ones at stake;
- Payments to the ESCO company to be exported at an earlier stage in two parts – 1st payment after realization of 1/2 of the investment; 2nd payment after acceptance of the object.
 - In this way, the inflation risk for the ESCO and the beneficiary is mitigated.
- Use of the 'Competitive dialogue' form of tendering procedure
 - In this way, ESCOs can compete at the level of innovation and solutions, rather than on Bills of Quantities (KSS). As a result, the efficiency of investments increases.

II. Latvia

The reviewed programme (the 'Programme') is part of the Latvian Recovery and Resilience Plan ('HEU') and targets renovation of multi-family residential buildings. The case study when using an ESCO model is discussed.

1. Participants

The main actors in an ESCO model are:

- The Latvian fund "Altum"
- Authorized persons (representatives of the owners of apartments)
- The owners of apartments ("Condominium" / "EK")
- ESCOs
- Banks

2. Key Points in the Implementation of the Program

The amount of the subsidy is not more than 49%. The option for the implementation of energy-saving measures is regulated in the form of engineering (design and implementation). The possibility of assisting, within 49% of the costs, the preparation of the technical documentation of the project is also open.

Key is the mention in the program that the recipients of grants do not apply the provisions of the Public Procurement Act, except in cases where they are public entities.

The main steps in the implementation of the program are depicted in the graph below and are as follows:



ALLIANCE ABOUT ENERGY EFFICIENCY



Step 1: ETS authorizes their representative ("Authorized Person" / "UL") to represent them before the Program and assist during its implementation. There is no special requirement for a procedure to be followed when choosing a Str.

Step 2: ETS has the option to attract an ESCO company in the implementation of the Program and the renovation of the building to be done in the form of an engineering project that includes both design and implementation (see item 70 in Decree 460 of Section 3, Available documents). The selection of an ESCO company must follow good market practices – consideration of more than one offer, absence of conflicts of interest and the like (see point 59 in Order 460 of Section 3, Available documents).

Step 3: The ESCO company should select its suppliers and subcontractors following good market practices - consideration of more than one offer, absence of conflict of interest, prevention of fraud and corruption (see item 70 in Decree 460 of Section 3, Available documents).

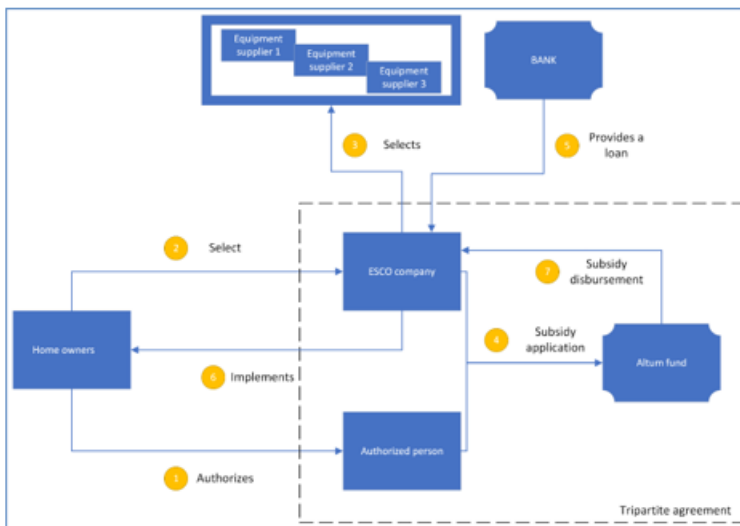
Step 4: Altum, UL and ESCO sign a tripartite contract upon approval of the Program application.

Step 5: The ESCO company provides the necessary funding to implement the renovation.

Step 6: The ESCO company implements the envisaged energy saving measures.

Step 7: After implementation of the renovation, the ESCO company provides all reporting documents to Altum and receives the envisaged subsidy.

Figure 3: General scheme of the programme in *Latvia*



Source: FinERGo-Dom / Energy Efficiency Alliance

G. Sofia, P.O. Box 1000, ul. "Tsar Shishman" No3, entr. B, mobile: +359 888 615358,
E-mail: office@alliance-ee.bg, Website: <http://alliance-ee.bg>



ALLIANCE ABOUT ENERGY EFFICIENCY



3. Documents Available

The following documents are available for use/adaptation:

- Decree of the Council of Ministers No.460 regulating the implementation of the program¹

4. Recommendations for Bulgaria

What is described in this section is another edition of the program for renovation of multifamily residential buildings in Latvia, but in this case under the auspices of the Latvian University of Architecture. The structure and organization of the Latvian program, in its entirety, is a good practice that has already served as the basis for a similar one in Poland (see Section III). Experience in Bulgaria is in the process of being transferred under the FinEERGo-Dom² project, especially in the part of good practices that it is advisable to follow by ESCOs. Among the main mechanisms of the Program, which can be replicated in our country, are:

- Easy and fast application procedures, selection of UL, ESCO, suppliers and subcontractors (in cases where beneficiaries are not public entities).
- Ability to use engineering, which leads to shortening the deadlines for implementation of renovation [projects](#)
- Additional source of finance through ESCO
- Existence of a tripartite contract, which guarantees synchronization between beneficiary, [contractor](#) and grantor.
- Subsidy for preparation of application documents up to 49%

III. Poland

Multifamily residential buildings are also targeted by the program "Renovation through ESCO Plus" ("Program"). It uses as a basis for its creation and structuring the Latvian renovation program (see section II) in its part that allows partnership with an ESCO company. The Polish program was developed within the FinEERGo-Dom project, which also has representatives from Bulgaria in its consortium, and to date it is in progress on implementation³.

1. Participants

Main participants are depicted in the lower figure. The interactions between them are as follows:

- National Fund for Environmental and Water Protection ("NFOŚiGW")
Provides a subsidy of between 10% and 30% depending on the degree of ambition for energy saving of the candidate project.
- National Agency for Energy Efficiency ("KAPE")
Assists ETS and ESCOs in the process of implementing the program.
- National Development Fund ("PFR")

¹ <https://likumi.lv/ta/id/334084-eiropas-savienibas-atveselosanas-un-noturibas-mehanisma-plana-1-2-reformu-un-investiciju-virziena-energoefektivitates-uzlabosana#p65.4&pd=1>

² <https://fineergodom.eu/>

³ <https://www.gov.pl/web/funduszmodernizacyjny/renowacja-z-gwarancja-oszczednosci-epc-energy-performance-contract-plus>

ALLIANCE ABOUT ENERGY EFFICIENCY

THE GLOBAL ESCO NETWORK

EU Signatory

Buys the incurred receivables of the ESCO company up to 80%. In this way, an ESCO company recovers part of the investment in multi-family residential buildings and can invest it in a subsequent renovation project.

- ESCO company
- Owners of apartments / condominium ownership ("EtS")

Figure 4: General scheme of the programme in Poland

Source: FinEERGo-Dom

2. Key Points in the Implementation of the Program

The following figure depicts the application and implementation processes of the Program:

Step 1: Pre-approval

General eligibility criteria for the applicant are checked. There is a possibility to use a basic calculator to prepare preliminary calculations. If necessary, NFOŚiGW issues letters of commitment (or other necessary documents) for prior approval to finance the project.

Step 2: Submit a candidate project

After selecting an ESCO company (on a general basis, if the applicant does not fall within the scope of the Public Procurement Act) and preparation of technical documentation together with it (Energy Audit, etc.), the applicant submits a candidate project for granting a subsidy.

Step 3: Implementation

The ESCO company implements the envisaged energy saving measures.

Step 4: Absorption of the subsidy

G. Sofia, P.O. Box 1000, ul. "Tsar Shishman" No3, entr. B, mobile: +359 888 815358,
E-mail: office@alliance-ee.bg, Website: <http://alliance-ee.bg>



ALLIANCE ABOUT ENERGY EFFICIENCY

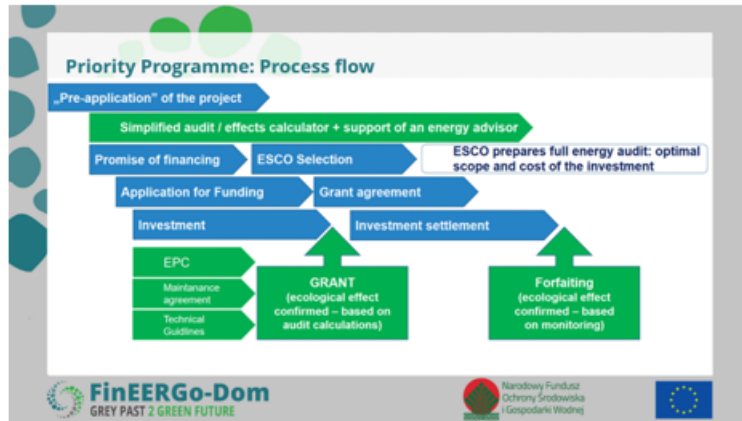


After verification, NFOŚiGW grants a subsidy of up to 30%. Grounds for approval of the subsidy is the existence of a concluded ESCO contract according to the template of the Program.

Step 5: Cession

One year after the completion of the project, with successfully verified energy savings, the ESCO company can sell up to 80% of its receivables (monthly ~~installments~~ payments paid ETC within the realized energy savings) to PFR.

Figure 5: Sequence of processes in Poland



Source: FinEERGo-Dom

3. Documents Available

As the programme is in progress, all documents are available:

- General guidelines
- Technical Guidelines
- Guidelines for NFOŚiGW co-financing
- List of annexes
- List of required documents according to the type of beneficiary
- Notice for submission of project [proposals](#)
- Application form for preliminary approval
 - o Guidelines for completing an application form for [pre-approval](#)
 - o Set of declarations from the beneficiary
 - o Additional templates and shapes
 - o Calculator
- Application form for approval
 - o Guidelines for completing an application form for [approval](#)
 - o Set of declarations from the beneficiary

G. Sofia, P.O. Box 1000, ul. "Tsar Shishman" No3, entr. B, mobile: +359 888 615358,
E-mail: office@alliance-ee.bg, Website: <http://alliance-ee.bg>



ALLIANCE ABOUT ENERGY EFFICIENCY



- o Additional templates and shapes
- Framework contracts and annexes

4. Recommendations for Bulgaria

The Polish program "Renovation with ESCO Plus" can be replicated directly in Bulgaria. Several essential elements deserve to be singled out:

- The program is designed exclusively for ESCOs. In this way, it is possible to develop the provision of complex energy services "one-stop-shop" (integrated services – engineering, monitoring, guarantee/insurance of the achieved savings, operation and maintenance, etc.) As a result, the time until energy savings are achieved. Transfers of processes between individual companies are avoided.
- The contracts for the implementation of energy-saving measures also provide for the service management and maintenance. In this way, the newly introduced technologies and assets are stored, respectively. A comprehensive sustainable approach to energy consumption management is introduced.
- ESCOs have the opportunity to maintain high liquidity and increase their investments in energy-saving measures for new customers, as PFR buys their receivables from completed projects no earlier than one year.
- The program provides additional benefits to participants after a real verification of the savings achieved (cession after one year to PFR).
- The amount of the subsidy is within limits that do not pass on the cost entirely to the European taxpayer, but also require participation/funding from the beneficiaries.



ALLIANCE ABOUT ENERGY EFFICIENCY



Briefly about BeSmart

The Bulgarian Forum for Financing Energy Efficiency Projects:

The transition to a low-carbon economy requires higher energy efficiency and better energy management, the introduction of new specialised services and the development of financial mechanisms. This exceptional challenge is particularly relevant in the building sector, where the currently used 100% grant mechanism for the renovation of multi-family residential buildings needs to be reformed into a more sustainable financing scheme that is socially acceptable, ensures the participation of vulnerable consumers and at the same time sets higher criteria for energy efficiency and environmental benefits.

What are we aiming for?

To help develop and implement policies and financial mechanisms to support investment in energy efficiency and to support the implementation of European sustainable energy development initiatives at national and local level.

How will we achieve it?

- Involving all stakeholders in an open dialogue
- Dissemination of good practices, [initiatives](#) and tools
- By building an online communication platform for sharing knowledge and experience
- With nine national roundtables with extensive media coverage
- With specific recommendations for the development of financial instruments to support energy efficiency

Target groups:

- Banks, other financing institutions and ESCOs
- Representatives of the central government, mainly from the ministries of finance, economy, energy, regional development and public works and the executive agencies belonging to them.
- Local and regional authorities
- National associations - construction, SMEs and industry associations, consumer associations and various service providers
- Think tanks and [academia](#)
- The [general public](#) and citizens
- Media.

G. Sofia, P.O. Box 1000, ul. "Tsar Shishman" No3, entr. B, mobile: +359 888 615358,
E-mail: office@alliance-ee.bg, Website: <http://alliance-ee.bg>



ALLIANCE ABOUT ENERGY EFFICIENCY



Main benefits:

- Involving all stakeholders in an open dialogue
- Dissemination of good practices, initiatives and tools
- By building an online communication platform for sharing knowledge and experience
- With nine national roundtables with extensive media coverage
- With specific recommendations for the development of financial instruments to support energy efficiency



This project has been funded with support from Horizon 2020 of the European Union by grant agreement No 101033787.

G. Sofia, P.O. Box 1000, ul. "Tsar Shishman" No3, entr. B, mobile: +359 888 615358,
E-mail: office@alliance-ee.bg, Website: <http://alliance-ee.bg>

<p style="text-align: center;"><u>Working Group I:</u> Development of the ESCO market</p> <p style="text-align: center;">UPDATE OF ORDINANCE 16-347 of 2009 (The ESCO ORDINANCE) Introduction of good European practices.</p> <p style="text-align: center;"><i>Summary</i></p> <p><i>The proposed amendments to the Ordinance aim to bring it in line with the latest revisions of the Energy Efficiency Directive, the Energy Efficiency Act, the Renewable Energy Sources Act, as well as good practices established by the Energy Efficiency and Renewable Energy Sources Fund (EERSF), the European Investment Bank and the Global ESCO Association.</i></p> <p><i>The second direction of the proposals concerns the return of the dropped provisions in the old ordinance, thanks to which the owners of state- and municipal buildings can apply for funding in the payment of contracts with guaranteed results before the Ministry of Finance and the central budget after approval by the Sustainable Energy Development Agency.</i></p> <p style="text-align: center; font-size: small;">G. Sofia, P.O. Box 1000, ul. "Tsar Shishman" No3, entr. B, mobile: +359 888 015358, E-mail: office@alliance-ee.bg, Website: http://alliance-ee.bg</p>	<p>Content:</p> <p>I. Textual proposals and opinions presented in tabular form..... 3</p> <p>II. Textual proposals and opinions presented in the provisions of the ordinance..... 10</p> <p>III. List of supporters of the proposals 29</p> <p style="text-align: center; font-size: small;">G. Sofia, P.O. Box 1000, ul. "Tsar Shishman" No3, entr. B, mobile: +359 888 015358, E-mail: office@alliance-ee.bg, Website: http://alliance-ee.bg</p>
--	--

<p>I. Textual proposals and opinions presented in tabular form</p> <p><i>/Content in tabular format/</i></p> <p>II. Textual proposals and opinions presented in the provisions of the ordinance</p> <p>ORDINANCE No. ON THE TERMS AND CONDITIONS FOR DETERMINING THE AMOUNT AND PAYMENT OF FUNDS UNDER GUARANTEED PERFORMANCE CONTRACTS LEADING TO ENERGY SAVINGS IN BUILDINGS – STATE AND/OR MUNICIPAL PROPERTY</p> <p>Chapter One GENERAL</p> <p>Art. 1. (1) This Ordinance shall regulate:</p> <ol style="list-style-type: none"> 1. the terms and procedure for determining the amount of the funds planned under the budgets of the spending units for the implementation of services under guaranteed contracts (ESCO contracts) in buildings – state and/or municipal property; 2. the terms and procedure for payment of the remunerations under the guaranteed result contracts for the buildings under item 1. (2) The determination of the amount of the funds planned under the budgets of the spending units for the implementation of contracts with guaranteed results in buildings – state and/or municipal property shall be carried out on the basis of an energy efficiency audit and an issued certificate for energy performance, certifying the current state of the energy consumption in the building. (3) The payment of funds under guaranteed performance contracts in buildings – state and/or municipal property shall be made upon reaching a level of energy efficiency improvement, guaranteed energy savings or other agreed criterion related to energy performance, which ensure the achievement of the legally required class of energy consumption for the building subject of the contract. <p>Art. (1) By the order of this Ordinance shall be determined and paid the funds for the implementation of activities and measures for increasing energy efficiency, reducing the costs of operation and maintenance, as well as other activities generating financial benefits provided for in contracts with guaranteed results.</p> <p>(2) Contracts with guaranteed results:</p> <ol style="list-style-type: none"> 1. are concluded for the implementation of measures for improving energy efficiency in buildings – state and/or municipal property, and the investments for the implementation of these measures <p style="text-align: center; font-size: small;">G. Sofia, P.O. Box 1000, ul. "Tsar Shishman" No3, entr. B, mobile: +359 888 015358, E-mail: office@alliance-ee.bg, Website: http://alliance-ee.bg</p>	<p>shall be paid according to the agreed guaranteed level of improvement of energy efficiency or another agreed criterion related to energy performance.</p> <ol style="list-style-type: none"> 2. are performed by energy efficiency service providers – traders within the meaning of the Commerce Act or within the meaning of the legislation of another Member State of the European Union or of another State party to the Agreement on the European Economic Area or of the Swiss Confederation, with the subject of an activity including the performance of services under contracts with guaranteed results; 3. guarantee a result for received energy and financial savings in a numerical indicator that is assessable, measurable and verifiable by the methodology/standards for determining the energy consumption in buildings, art. 31, para. 4 of the EEA. <p>---</p> <p><i>Opinion:</i></p> <p><i>See opinion to art. 17, item 1, new sub-item.</i></p> <p><i>See opinion to art. 18, para. (2).</i></p> <p><i>Proposal for a new text:</i></p> <p><i>3. guarantee a result for received energy and financial savings and/or benefits in a numerical indicator that is assessable, measurable and verifiable according to the measurement and verification methodology/standards "PMVP" or "ISO 50015".)</i></p> <p>---</p> <p>---</p> <p><i>Opinion:</i></p> <p><i>Good European practice implies that guaranteed contracts are assessed as an option for the implementation of energy-saving measures for state- and municipal-owned buildings.</i></p> <p><i>The aim is to attract private financial resources, to save public, to develop market-sustainable models, not grants.</i></p> <p><i>Proposal for a new text:</i></p> <p><i>(new item) are assessed as a possibility for the purpose of implementing energy saving measures.)</i></p> <p>---</p> <p>Art. 3. (1) The persons under art. 2, para. 2, item 2, referred to as "ESCO service providers":</p> <ol style="list-style-type: none"> 1. ensure the provision of ESCO services provided for in the performance contracts, in whole or in part with own funds, in whole or in part with the resources of the contracting authority, including <p style="text-align: center; font-size: small;">G. Sofia, P.O. Box 1000, ul. "Tsar Shishman" No3, entr. B, mobile: +359 888 015358, E-mail: office@alliance-ee.bg, Website: http://alliance-ee.bg</p>
---	---

those provided by national or European support schemes and mechanisms, and/or undertake to ensure their financing by a third party;

...

(Opinion:

Further expand the range of sources of funding.

Proposal for a new text:

1. ensure the provision of ESCO services provided for in the performance contracts in whole or in part with own resources, in whole or in part with the resources of the contracting authority, including and not limited to those provided by national or international support schemes and mechanisms, and/or undertake to ensure their financing by a third party;)

...

2. bear the financial, technical and commercial risk for the implementation of the activities and measures provided for in the contract to improve energy efficiency and to achieve the result guaranteed by the contract;

3. take into account the annual result guaranteed under the contract through a bilaterally signed statement of findings.

(2) The statement of findings under para. 1, item 3 shall be drawn up once a year, as of the date of commissioning of the site, on the basis of a methodology for reporting the guaranteed result, which is an integral part of the contract with an assured result and is in compliance with the requirements of the ordinance under art. 18(2) of the EEA.

...

(Opinion:

See opinion to art. 18, para. (2).

Proposal for a new text:

(2) The statement of findings under para. 1, item 3 shall be drawn up once a year, from the date of commissioning of the site, on the basis of a methodology for reporting the guaranteed result, which is an integral part of the contract with an assured result and is in accordance with the standard for measurement and verification "PMVP" or "ISO 50015".)

...

(3) The persons under para. 1 shall provide annually data on completed projects with guaranteed results, which include the envisaged and achieved energy and financial savings of the Agency for Sustainable Energy Development.

...

G. Sofia, P.O. Box 1000, ul. "Tsar Shishman" No3, entr. B, mobile: +359 888 615358, E-mail: office@alliance-ee.bg, Website: <http://alliance-ee.bg>

(Opinion:

We propose to continue the Agency's good practice of making the data it collects publicly available.

Proposal for a new text:

(3) The persons under para. 1 shall provide annually data on completed projects with guaranteed results, which include the envisaged and achieved energy and financial savings of the Agency for Sustainable Energy Development and shall become publicly available on the website of the Agency.)

...

Art. 4. (1) The restoration of the one made by the persons under art. 3, para. 1 investment for the implementation of activities and measures to increase energy efficiency, as well as the payment of the remuneration due under the contract, shall be carried out for the duration of the contract, taking into account the realized energy savings, certified by a statement of findings under art. 3, para. 2.

(2) The payment of the remuneration due under the contract may be made quarterly, and at the end of the year an equalization contribution shall be made under the contract. In the event that quarterly payments exceed the amount of energy savings costed, the excess shall be distributed in an agreed ratio between the parties.

(3) The guaranteed energy saving shall be defined as the difference between the normalized energy consumption, calculated before the implementation of the energy efficiency improvement measures provided for in the contract, and the guaranteed energy consumption in the building after their implementation.

(4) Where the performance contract is performed for several buildings, the total guaranteed energy saving shall be calculated as the sum of the individual guaranteed energy savings of each of them.

Chapter Two PROCEDURE FOR DETERMINING THE AMOUNT OF THE FUNDS PLANNED UNDER THE BUDGETS OF THE AUTHORIZING OFFICERS FOR THE IMPLEMENTATION OF ESCO SERVICES UNDER GUARANTEED CONTRACTS IN BUILDINGS - STATE AND/OR MUNICIPAL PROPERTY

Section I Determination of the amount of funds planned under the budgets and provision of funding for the implementation of ESCO services under guaranteed contracts in state-owned buildings

Art. 5. Budget spending units may plan funds for the implementation of a contract/contracts with guaranteed results within the budgets approved by the State Budget of the Republic of Bulgaria Act for the respective year.

Art. 6. (1) The planning of the funds under art. 5 is carried out under the conditions of art. 1, para. 2, the amount of planned funds corresponding to the normalized energy consumption.

...

(Opinion:

G. Sofia, P.O. Box 1000, ul. "Tsar Shishman" No3, entr. B, mobile: +359 888 615358, E-mail: office@alliance-ee.bg, Website: <http://alliance-ee.bg>

We propose similar to the provision of funds for normalized energy consumption to provide funds for normal operation and maintenance in order to secure payments and in this direction in order to store the renovated building.

Proposal for a new text:

Art. 6. (1) The planning of the funds under art. 5 is carried out under the conditions of art. 1, para. 2, as the amount of the planned funds corresponds to the normalized energy consumption, as well as taking into account the normal costs of operation and maintenance and other relevant to ensuring the suitability of the buildings.)

...

(2) The planned payments to the contractors of ESCO services for the recovery of the investment shall not exceed the agreed guaranteed result for energy and financial savings - subject of the contract with guaranteed results.

...

(Opinion:

There is a hypothesis that the contributions for the recovery of the investment exceed the achieved energy savings in case the contracting authority has access to financial resources with which to co-finance and wishes to repay the investment of the ESCO company in a shorter period in order to pay less interest and takes advantage of 100% of the financial benefits that have arisen at an earlier stage. At the same time, the bonification/penalization mechanism of the ESCO company in case of overshooting/non-achievement of the guaranteed result should be periodically reported and active (hence the construction "... uogo oocypura...").

See also opinion to Art. 17, 1, proposal for a new sub.

Proposal for a new text:

(2) The planned payments to the contractors of ESCO services for the recovery of the investment must take into account the agreed guaranteed result for energy and financial savings and benefits - subject of the contract with a guaranteed result.)

...

(3) The amount of the estimated funds shall include an appreciation corresponding to the amount of the interest rate of the Bulgarian National Bank for long-term investment loans as of the date of conclusion of the contract.

...

(Opinion:

See opinion to art. 17, p.11.

G. Sofia, P.O. Box 1000, ul. "Tsar Shishman" No3, entr. B, mobile: +359 888 615358, E-mail: office@alliance-ee.bg, Website: <http://alliance-ee.bg>

In addition, the statement contradicts art. 12, para. (1), item 3, where we have proposed a revision in relation to the imposed limit for the duration of the contract with guaranteed results within the simple payback period of the energy-saving measures.

Proposal for text:

(3) The amount of the estimated funds shall also include an appreciation corresponding to the amount of the interest rate of the Bulgarian National Bank for long-term investment loans as of the date of conclusion of the contract and/or other indicators referenced in the guaranteed performance contract)

...

(4) The determination of the amount of funds under the contract with guaranteed result shall be made on the basis of the monetary equivalent of the guaranteed energy saving, valued at the current price of the energy as of the date of signing the ascertainment protocol under art. 3, para. 2.

...

(Opinion:

The restriction to use only the current price at the date of signing the contract opens the possibility of distortions with effect for the entire duration of the contract. The good practice is to adopt an average price for the whole year to avoid seasonal fluctuations or one for the last 2-3 years, potentially with different burdens if there are substantial fluctuations in the energy supply conditions. Of course, the possibility of adopting a current price at a date of signing is also permissible under certain conditions.

Proposal for a new text:

(4) The determination of the amount of funds under the contract with guaranteed performance shall be made on the basis agreed between the parties the monetary equivalent of the guaranteed energy saving, e.g. valued at the actual price of energy as of the date of signing the ascertainment protocol under art. 3, para. 2.)

...

Art. 7. The examination and approval of the means for the performance of guaranteed contracts shall be carried out under the terms and conditions of Chapter Three.

Art. 8. In the case of a contract/contracts with an assured result, the budget spending units shall provide annually for the provision of funds for servicing the contract/contracts with a guaranteed result until the repayment of the obligations to the ESCO service providers approved by the State Budget of the Republic of Bulgaria for the respective year.

Section II Determining the amount of funds planned under the budgets and providing funding for the implementation of ESCO services under guaranteed contracts in municipal property buildings

G. Sofia, P.O. Box 1000, ul. "Tsar Shishman" No3, entr. B, mobile: +359 888 615358, E-mail: office@alliance-ee.bg, Website: <http://alliance-ee.bg>

<p>Art. 9. Each municipality may plan funds for payment of obligations under contracts with guaranteed results in buildings - municipal property, in the draft budget for the respective year after a decision of the municipal council.</p> <p>...</p> <p>(Opinion:</p> <p><i>We believe that the repeal of the provisions of the old ordinance, enabling municipalities to submit requests to the Ministry of Finance for the allocation of financial resources for the payment of contracts with a guaranteed result from the central budget, is a fundamental change in the meaning and meaning of the ESCO regulation. A smart mechanism is being abolished through which the central budget has supported the process of decarbonisation of the public building stock in years when I have tens of times less financial resources.</i></p> <p><i>As a consequence of the abolition of the support mechanism, the ESCO model becomes inapplicable because public buildings are chronically underfunded – energy poor and in a state of accelerated depreciation, i.e., there is no normal energy consumption, operation and maintenance. In this way, the generation of energy and financial savings through guaranteed performance contracts becomes impracticable.</i></p> <p><i>Return of the relevant provisions of the old ordinance and restoration of the mechanism for requesting support from the Ministry of Finance, which emulates normal exploitation of the building stock, allows the use of contracts with guaranteed results and stops the process of destruction of the public building stock by attracting private financial resources.</i></p> <p><i>We have also proposed some amendments to the restored provisions of the Ordinance with a view to expanding the scope of the mechanism and adopting good European practices.</i></p> <p>Proposal for a new text:</p> <p><i>(return of old paragraph (2) with revision) The determination and payment of funds from the central budget under contracts with guaranteed results for municipal property buildings is carried out only for buildings with a total built-up area of over 250 sq. (m) subject to the conditions of Chapter Three.</i></p> <p><i>(return of old paragraph (3)) Funds from the central budget shall be provided to finance the implementation of ESCO services under guaranteed contracts after obtaining a certificate of at least category B for the municipal property buildings under para. 2, for which energy efficiency improvement measures have been implemented and the energy consumption levels specified in the contract(s) have been reached.</i></p> <p><i>(return of an old paragraph (4) with adjacent points) Municipalities that have concluded a contract/contracts with guaranteed results in buildings under art. 9, para. 2, submit to the Ministry of Finance:</i></p> <p>1. a request for financing under the contract(s) with a guaranteed result together with a copy of the summary for an inspection of the building, a notarized copy of the contract(s) with an assured result for this building, the decision of the municipal council, a copy of the issued</p> <p>G. Sofia, P.O. Box 1000, ul. "Tsar Shishman" No3, entr. B, mobile: +359 888 615358, E-mail: office@alliance-ee.bg, Website: http://alliance-ee.bg</p>	<p><i>certificate for the building in which the energy efficiency improvement measures have been implemented, as well as a repayment plan for the budgets under the contract(s);</i></p> <p>2. information on the planned means of performance of the contract and the corresponding measures to improve energy efficiency and other financial benefits;</p> <p>3. information about implemented so far, financed under national or other programs from the state budget or from other financial sources, including external programs, credit institutions, etc., activities and measures to improve energy efficiency in the building/buildings subject to the contract with guaranteed results, as well as the amount of their financing.</p> <p><i>(return of old Art. 11 with adjacent paragraphs) (1) The consideration and approval of the funds for the execution of contracts with guaranteed results in municipal property buildings shall be carried out under the terms and conditions of Chapter Three by the Energy Efficiency Agency, which shall send a reasoned proposal to the Ministry of Finance to finance the payment thereunder and certify that no other certificate has been issued for the respective building as a result of implemented activities under other programs or from other financial sources.</i></p> <p><i>(2) After approval of the funds under para. 1 they shall be provided from the central budget of the municipalities by the order of art. 34, para. 2 of the State Budget Act.</i></p> <p><i>(return of old Art. 12) The provision of funds from the central budget for servicing contracts with guaranteed results in the buildings under art. 9, para. 2 shall be carried out until the repayment of the obligations under these contracts.)</i></p> <p>...</p> <p>Art. (1) Planned payments to ESCO contractors for the recovery of the investment shall take into account the scope of the guaranteed result, including the energy savings and other relevant financial benefits subject to the performance contract.</p> <p>(2) The amount of the estimated funds shall include an appreciation corresponding to the amount of the interest rate of the Bulgarian National Bank for long-term investment loans as of the date of conclusion of the contract.</p> <p>...</p> <p>(Opinion:</p> <p><i>See opinion to art. 6, para. (3).</i></p> <p>Proposal for a new text:</p> <p><i>(2) The amount of the estimated funds shall include an appreciation corresponding to the amount of the interest rate of the Bulgarian National Bank for long-term investment loans as of the date of conclusion of the contract and/or other indicators referenced in the guaranteed performance contract.)</i></p> <p>G. Sofia, P.O. Box 1000, ul. "Tsar Shishman" No3, entr. B, mobile: +359 888 615358, E-mail: office@alliance-ee.bg, Website: http://alliance-ee.bg</p>
---	--

<p>...</p> <p>(3) The determination of the amount of funds under the contract with a guaranteed result shall be made on the basis of the agreed guaranteed result for energy and financial savings.</p> <p>...</p> <p>(Opinion:</p> <p><i>We offer a staging analogous to art. 91 para. 1 of the State Budget Act, with a view to ensuring the consistency and stability of the regulatory framework.</i></p> <p>Proposal for a new text:</p> <p><i>(new article) The annual amount of payments for each municipality under long-term contracts with guaranteed performance (ESCO contracts) shall not be included in the total annual amount of payments under the municipal debt for the respective municipality when determining the ratio and applying the limit under art. 32, para. 1 of the Public Finance Act.)</i></p> <p>...</p> <p>Section III Determining the amount of funds planned under the budgets and providing funding for the implementation of ESCO services under guaranteed contracts in buildings with mixed ownership regime - state and municipal</p> <p>Art. (1) The planning and provision of financing for the implementation of guaranteed performance contracts in buildings with mixed ownership regime shall be carried out:</p> <p>1. under the conditions and by the order of Section 1 - in the cases where the state is the owner of the larger share of the co-owned building;</p> <p>2. under the conditions and by the order of Section Two - in the cases when the municipality is the owner of the larger share of the co-owned building.</p> <p>(2) Where the state and the municipality hold equal shares of the respective building, the financing shall be planned and provided under the conditions and by the order of Section one for the part of the building representing state property, and under the conditions and by the order of Section Two for the part of the building representing municipal property.</p> <p>Chapter Three FINANCING CONDITIONS AND REQUIREMENTS FOR GUARANTEED PERFORMANCE CONTRACTS IN BUILDINGS - STATE AND/OR MUNICIPAL PROPERTY</p> <p>Section I Conditions for financing guaranteed performance contracts in buildings - state and/or municipal property</p> <p>Art. (1) The contracts with guaranteed result in buildings - state and/or municipal property, for which funds are planned in the budgets of the spending units, shall be financed in compliance with the following conditions:</p> <p>G. Sofia, P.O. Box 1000, ul. "Tsar Shishman" No3, entr. B, mobile: +359 888 615358, E-mail: office@alliance-ee.bg, Website: http://alliance-ee.bg</p>	<p>1. the activities and measures envisaged for implementation to increase energy efficiency to ensure the achievement of energy savings and the issuance of an energy efficiency certificate corresponding at least to the requirements for issuing a class B certificate;</p> <p>2. the measures envisaged for implementation to increase energy efficiency to be implemented with materials complying with the requirements of the Technical Requirements for Products Act;</p> <p>3. the payback period of the energy savings investment provided for in the guaranteed contract shall not be longer than the simple redemption period of the package of measures provided for in the contract.</p> <p>...</p> <p>(Opinion:</p> <p><i>The proposed point makes it impossible to attract private financial resources, e.g. ESCOs to use specialized credit lines, as envisaged by the Fund of Funds in the next programming period, through the banking sector. The simple payback period does not imply consideration of the cost of attracted private financing and renders ESCO projects unviable.</i></p> <p><i>We believe that the dropped point dealing with the terms of guaranteed contracts is more relevant, after reflecting the need to adopt terms longer than ten years. This opens the possibility for ESCO projects to cover the full energy savings potential of buildings, the so-called Energy Savings Potential. "deep" renovation.</i></p> <p>Proposal for a new text:</p> <p><i>"3. the payback period of the investment for energy savings provided for in the guaranteed contract shall not exceed 20 years, and in certain cases, e.g. buildings-monuments of culture, from 25 years")</i></p> <p>...</p> <p>(2) The recovery and/or ancillary activities included in the subject of the contract with guaranteed results, which guarantee the operational suitability of the measures for improving energy efficiency, shall not be subject to financing under para. 1.</p> <p>...</p> <p>(Opinion:</p> <p><i>In the implementation of energy-saving measures, the amount of accompanying and supporting activities is essential and inevitable. Failure to pay for this type of activities makes the implementation of the overall energy-efficient project meaningless, i.e., it is a barrier to the realization and achievement of energy savings and a prerequisite for poor quality energy efficiency and accidents. In addition, "deep" renovation projects are hindered, in which the prescriptions in the technical passports, subject to mandatory implementation, are also implemented.</i></p> <p>G. Sofia, P.O. Box 1000, ul. "Tsar Shishman" No3, entr. B, mobile: +359 888 615358, E-mail: office@alliance-ee.bg, Website: http://alliance-ee.bg</p>
---	---

<p> </p> <p><i>We propose the long-standing practice of the Energy Efficiency Fund (regulated by the Energy Efficiency Act) to finance accompanying and supporting activities if they do not exceed 50% of the value of the investment.</i></p> <p>Proposal for a new text:</p> <p>(2) <i>The recovery and/or ancillary activities included in the subject of the contract with guaranteed results, which guarantee the operational suitability of the measures for improving energy efficiency, shall not be subject to financing under para. 1 if they exceed 50% of the value of the investment.</i></p> <p>...</p> <p>Section II Requirements for performance contracts</p> <p>Art. 13. Guaranteed performance contracts subject to financing under this Ordinance include the following stages - preliminary research stage, actual stage and contract servicing stage.</p> <p>Art. (1) The preliminary research stage shall include an analysis of the results of an energy efficiency audit.</p> <p>...</p> <p>(Opinion:</p> <p><i>In any case, if there is an energy audit available, it should be submitted for analysis. As a result of the analysis, if it is established that no one can take responsibility, that the prescribed in the energy audit is realistic and fit for realization, and / or if there is no energy audit at all, then a hypothesis should be provided for the preparation of a new energy audit by the ESCO company, respectively, to present measures fit for realization and realistic, for which responsibility and guarantee can be assumed.</i></p> <p>Proposal for a new text:</p> <p>Art. (1) <i>The preliminary research stage shall include an analysis of the results of an energy efficiency audit and/or the preparation of a new one by the contractor with a guaranteed result.</i></p> <p>...</p> <p>(2) <i>Where the ESCO service provider does not accept the results of a previous audit, he may make a new investigation, which shall not be financed from the budget of the respective authorizing officer.</i></p> <p>...</p> <p>(Opinion:</p> <p><i>The lack of opportunity to pay realistic and implementable energy audits hinder the implementation of energy-efficient projects for which guarantees can be taken to achieve energy savings.</i></p> <p>G. Sofia, P.O. Box 1000, ul. "Tsar Shishman" No3, entr. B, mobile: +359 888 615358, E-mail: office@alliance-ee.bg, Website: http://alliance-ee.bg</p>	<p> </p> <p><i>We propose the value of the energy audit to be paid within the term of the contract with guaranteed results. In this way, the beneficiary will be relieved to the maximum extent because of the free financial resources from the savings achieved during the contract.</i></p> <p>Proposal for a new text:</p> <p>(2) <i>When the ESCO service provider does not accept the results of a previous audit, he may make a new investigation to be paid within the term of the contract with guaranteed results.)</i></p> <p>...</p> <p>Art. (1) The actual stage of performance of the guaranteed contract shall include:</p> <ol style="list-style-type: none"> 1. elaboration or assignment by the ESCO service provider of the elaboration of an investment project, on the basis of which a building permit is issued, where such is necessary, in compliance with the requirements of the Spatial Planning Act (SPA) and the current secondary legislation on the design of systems, installations and facilities; 2. implementation of the investment project in compliance with the requirements of the SPA and the current secondary legislation. <p>(2) The actual stage shall be based on the results of the preliminary stage accepted by the contracting authority.</p> <p>Art. 16. The service stage of the contract with an assured result includes:</p> <ol style="list-style-type: none"> 1. ongoing and periodic monitoring, systematization and reporting of results for the energy savings guaranteed by the contract; 2. reimbursement of the investment made by the ESCO contractor and payment of the remuneration due to it, taking into account the assessed, measured and verifiable energy savings; 3. determining the terms and conditions for operation of the respective building in order to achieve the energy savings guaranteed in the guaranteed by the guaranteed contract. <p>Art. 17. Guaranteed performance contracts subject to financing under the terms and conditions of this Ordinance shall contain at least the parameters under art. 73, para. 3 of the Energy Efficiency Act, as well as:</p> <ol style="list-style-type: none"> 1. numerical values for: <ol style="list-style-type: none"> (a) the integrated energy performance of the building before and after the implementation of the measures; (b) current energy consumption before implementing energy efficiency improvement measures; (c) normalised energy consumption; (d) energy consumption after the introduction of energy efficiency improvement measures; (e) the guaranteed energy and financial savings for the building; <p>G. Sofia, P.O. Box 1000, ul. "Tsar Shishman" No3, entr. B, mobile: +359 888 615358, E-mail: office@alliance-ee.bg, Website: http://alliance-ee.bg</p>
---	---

<p> </p> <p>...</p> <p>(Opinion:</p> <p><i>In line with the new provisions of the Energy Efficiency Directive, performance contracts should be combined with innovative technologies and functionalities that bring additional benefits to owners e.g. demand-response management systems, energy storage systems, etc.</i></p> <p>Proposal for a new text:</p> <p><i>(new subst.) additional financial benefits, if any;</i></p> <p>...</p> <p>(f) the environmental equivalent (carbon dioxide emissions) of the energy saved;</p> <ol style="list-style-type: none"> 2. a plan for the introduction of the energy efficiency improvement measures prescribed in the energy efficiency audit report for the building; 3. methodology for monitoring, systematization and reporting of the results as a result of the implementation of the contract with guaranteed results; 4. method of payment of the investment and/or remuneration of the persons under art. 3, para. 1; 5. prices of the energy carriers, valid at the time of conclusion of the contract, without and with charged value added tax (VAT), as well as heat of combustion of used primary energy carriers and/or characteristics of converted energy carriers; 6. technical specifications and detailed bills of quantities for the proposed energy efficiency improvement measures, as well as a timetable for their implementation; 7. total value of the contract without and including charged VAT and breakdown of the investment required for the implementation of energy efficiency improvement measures and of the necessary investment for the implementation of the restorative, construction and repair activities to ensure the operational suitability of energy efficiency improvement measures; 8. conditions, terms and periodicity of reimbursement of the investment and payment of the remuneration due to the contractor under the contract with guaranteed result under a repayment schedule; 9. penalty clauses for non-fulfilment of obligations of each of the parties; 10. simple term of redemption of the investment under the contract, repayment period of the investment under the contract and term of validity of the contract; 11. mechanism for determining and updating the amount of the annual service in case of change in energy prices. <p>...</p> <p>(Opinion:</p> <p>G. Sofia, P.O. Box 1000, ul. "Tsar Shishman" No3, entr. B, mobile: +359 888 615358, E-mail: office@alliance-ee.bg, Website: http://alliance-ee.bg</p>	<p> </p> <p><i>An update mechanism should be envisaged not only in the event of a change in energy prices, but also in the case of changes in other long-term benchmarks, e.g. inflation, EURIBOR and/or other performance indicators referenced in the contract.</i></p> <p>Proposal for a new text:</p> <p>11. <i>mechanism for determining and updating the amount of the annual service in case of change in energy prices and/or other indicators referenced in the contract with guaranteed results.)</i></p> <p>...</p> <p>Chapter Four PROCEDURE FOR REIMBURSEMENT OF INVESTMENTS AND PAYMENT OF REMUNERATION UNDER GUARANTEED PERFORMANCE CONTRACTS</p> <p>Art. (1) The guaranteed result of energy savings shall be determined by a methodology for measuring and/or assessing consumption before and after the implementation of the energy efficiency improvement measures implemented under the performance contract, adjusting for the impact of external conditions and additional factors affecting the energy consumption of the building concerned.</p> <p>(2) For the purposes of accounting for the guaranteed energy savings and verifying the correctness of the reported results, the contractors of ESCO services, who perform contracts with guaranteed results, subject to financing under this Ordinance, shall develop the methodology under para. 1 in accordance with the requirements of the ordinance under Art. 18, para. 2 of the EEA.</p> <p>...</p> <p>(Opinion:</p> <p><i>We propose that periodic performance reporting, which usually takes place on a monthly, quarterly or annual basis, should follow established international practice in guaranteed performance contracts, using developed protocols and standards such as IPMPV or ISO 50015.</i></p> <p><i>If the requirement of the ordinance under Art. 18, para. 2 of the EEA for the needs of periodic reporting, then several times a year for the period of validity of the contract with guaranteed results, usually 10 years, energy audits must be carried out. The need to pay several energy audits per year would make guaranteed contracts meaningless from a financial point. For this reason, we propose this hypothesis to remain only in cases where it is legally necessary to prove energy savings, for example, issuing certificates for energy savings, reporting on the achievement of set individual goals, etc. Traditionally, this has been a one-time act, not a periodic one, and could be performed by any interested person.</i></p> <p>Proposal for a new text:</p> <p>(2) <i>For the purposes of periodic reporting of the guaranteed result, ESCO service providers who perform guaranteed performance contracts subject to funding under this Ordinance</i></p> <p>G. Sofia, P.O. Box 1000, ul. "Tsar Shishman" No3, entr. B, mobile: +359 888 615358, E-mail: office@alliance-ee.bg, Website: http://alliance-ee.bg</p>
--	---

shall develop the methodology under para. 1 in accordance with the measurement and verification standard "IPMVP" or "ISO 50015".

(new paragraph) If it is necessary to issue a certificate of energy savings and/or regulatory proof of the achieved energy savings, the requirements of the ordinance under Art. 18, para. 2 of the EEA.)

...

Art. 19. The investments and remuneration for ESCO services under guaranteed performance contracts carried out by the contractors of ESCO services under this Ordinance shall be reimbursed, respectively paid, taking into account the energy savings realized.

...

(Opinion:

See opinion to art. 25, para. (3).

Proposal for a new text:

(new article) The value added tax due as a result of the realization of the envisaged investments under a guaranteed performance contract shall be eligible for rescheduling within the term of validity of the contract.)

...

Art. 20. The energy savings assessed, measured and proven by ESCO contractors shall be valued annually in accordance with the procedure laid down in the performance reporting methodology.

Art. (1) The ESCO service provider shall submit annually to the owner of the building - contracting authority under the contract a report on monitoring, systematization and reporting of the guaranteed result.

(2) The report under para. 1 shall be drawn up before the protocol under art. 3, para. 2 and applied to it.

Art. 22. The total amount of the financial expenses reflected in the statement of findings under art. 3, para. 2, and the invoices for the payments made during the respective year shall be the basis for planning the necessary funds for servicing the contract, with a guaranteed result for the next financial year.

Art. (1) Where the reported energy savings reflected in the ascertainment protocol are greater than the guaranteed, the monetary equivalence of the difference, calculated through the energy prices used in determining the amount of the contract, shall not be subject to return to the state budget and shall be spent purposefully for payment under the contract as an advance contribution for the following year.

...

(Opinion:

G. Sofia, P.O. Box 1000, ul. "Tsar Shishman" No3, entr. B, mobile: +359 888 615358, E-mail: office@alliance-ee.bg, Website: http://alliance-ee.bg

The need to comply with art. 4, para. 2

Proposal for a new text:

Art. (1) Where the reported energy savings reflected in the statement of findings are greater than the guaranteed, the monetary equivalence of the difference, calculated through the energy prices used in determining the amount of the contract, shall not be returned to the state budget and shall be distributed in an agreed ratio between the parties.)

...

(2) Where the reported energy saving is less than the guaranteed one, the financial risk shall be borne by the ESCO service contractor.

Art. (1) The control over the implementation of the concluded contracts with guaranteed result shall be carried out by the respective authorizing officer.

(2) The spending units shall provide information to the Executive Director of the Sustainable Energy Development Agency about the contracts with guaranteed results implemented during the previous year under the ordinance under art. 70 of the EEA.

Chapter Five TERMS AND CONDITIONS FOR PAYMENT OF THE OBLIGATIONS FOR ENERGY EFFICIENCY SERVICES UNDER GUARANTEED PERFORMANCE CONTRACTS THROUGH THE BILLS FOR THE SUPPLIED ENERGY OR NATURAL GAS

Art. (1) The owners of buildings - state and/or municipal property, who conclude a contract with guaranteed result may negotiate deferred payment of energy efficient services through the bills for the delivered energy or natural gas with:

1. an energy undertaking supplying energy or natural gas to a final customer, which provides the same customer with an energy-efficient service;
2. the contractor of an assured contract and the energy company supplying energy or natural gas to a final customer through a tripartite contract for settlement of the payment of the obligations;
3. financing institutions offering financing of energy-efficient services and an energy company supplying energy or natural gas to collect and pay the value of the provided energy-efficient services through a tripartite contract for settlement of the payment of the obligations.

(2) The energy efficient services under the contract under para. 1 may not include the installation of heating installations of natural gas in the replacement of installations of liquid fuels of petroleum origin.

...

(Opinion:

We propose to drop Al. (2). The reasons are as follows:

- There are unnecessary restrictions on the choice of energy resources.

G. Sofia, P.O. Box 1000, ul. "Tsar Shishman" No3, entr. B, mobile: +359 888 615358, E-mail: office@alliance-ee.bg, Website: http://alliance-ee.bg

- There is a contradiction of the principles of the free market and a discriminatory restriction on energy from natural gas is introduced, which does not arise either from regulatory requirements or from the effect that natural gas achieves in the realization of energy savings.
- The replacement of liquid fuels with natural gas, in addition to an economic effect, has a highly environmentally friendly one.

...

(3) The value added tax due as a result of the realization of the envisaged investments under a guaranteed performance contract shall be admissible for rescheduling within the term of validity of the contract.

...

(Opinion:

We offer the staging of Al. (3) to be transformed into a new article in Chapter Four with a view to the hypothesis to cover guaranteed contracts for state and/or municipal property buildings as a whole, and not only in terms of bills for supplied energy or natural gas.)

...

(4) The energy company shall collect the amounts for the deferred payment and transfer them to the person offering energy efficiency services or the financing institution on a monthly basis, in accordance with the terms of the contract.

(5) Annually, on the basis of the valuation of the assessed, measured and proven by the contractors of the contracts with guaranteed results energy savings, if necessary, an adjustment of the amount due shall be made.

(6) The amounts for the deferred payment shall be shown as a separate line in the energy invoices. Invoices must provide a clear breakdown of energy consumption, and related repayment amounts, in accordance with the terms of the deferred payment contract.

(7) The energy company may negotiate with the provider of an energy-efficient service and with the end customer - owner of a building - state and/or municipal property - to take into account the achieved energy savings from the result of the energy-efficient service for the fulfilment of its individual objectives under art. 14a of the Energy Efficiency Act in its capacity as an obligated person.

(8) The energy company shall provide information to the Executive Director of the Sustainable Energy Development Agency about the contracts concluded under the Ordinance under art. 70 of the EEA.

Additional provision

§ 1. For the purposes of this Ordinance:

1. "Guaranteed energy savings" means the total amount of energy saved, determined by measuring and/or calculating before and after the application of one or more energy efficiency

G. Sofia, P.O. Box 1000, ul. "Tsar Shishman" No3, entr. B, mobile: +359 888 615358, E-mail: office@alliance-ee.bg, Website: http://alliance-ee.bg

improvement measures, taking into account the external climatic conditions and internal factors of the building, which comprehensively affect its energy consumption;

2. "Contract with guaranteed results" is a financial instrument for energy savings, in which investments for the implementation of activities and measures to increase energy efficiency are paid from the agreed energy and financial savings.

...

(Opinion:

See opinion to art. 10, para. (3) and to ...

Proposal for a new text:

2. "Contract with guaranteed results" is a financial instrument for energy savings, which is not accounted for as debt and the investments for the implementation of the activities and measures to increase energy efficiency are paid taking into account the agreed energy and financial savings.)

...

(Opinion:

We propose to define the standards and protocols for assessment referred to in the ordinance.

Proposal for a new text:

"IPMVP" and "ISO 50015" are leading standards for measurement and verification of the guaranteed performance in performance contracts under the auspices of the Organization for Performance Assessment and the International Organization for Standardization, respectively.)

...

Final provisions

§ 2. This Ordinance repeals Ordinance No RD-16-347 of 2 April 2009 on the terms and conditions for determining and disbursing the planned funds under guaranteed contracts leading to energy savings in buildings - state and/or municipal property (State Gazette No. 28 of 14 April 2009).

§ 3. The ordinance shall be issued on the grounds of Art. 73, para. 8 of the Energy Efficiency Act.

§ 4. The Ordinance shall enter into force from the day of its promulgation in the State Gazette.

G. Sofia, P.O. Box 1000, ul. "Tsar Shishman" No3, entr. B, mobile: +359 888 615358, E-mail: office@alliance-ee.bg, Website: http://alliance-ee.bg

 ALLIANCE ABOUT ENERGY EFFICIENCY  THE GLOBAL ESCO NETWORK  Signatory  	 ALLIANCE ABOUT ENERGY EFFICIENCY  THE GLOBAL ESCO NETWORK  Signatory  
<h3>III. List of supporters of the proposals</h3> <p>Energy Efficiency Alliance</p> <p>Agency for Energy and Sustainable Development</p> <p>Sofia Municipality</p> <p>Gabrovo Municipality</p> <p>Bulgarian Construction Chamber</p> <p>National Trust Ecofund</p> <p>Bulgarian-Austrian Consulting Company AD</p> <p>Overgas Networks SA</p> <p>Energoeffect Consult Ltd.</p> <p>We remain available!</p> <p>21.11.2023, Sofia</p> <p>Contact person:</p> <p>Kiril Raychev</p> <p>Chairman of the Board</p> <p>Energy Efficiency Alliance</p> <p>M: +359 888 615358</p> <p>E: office@alliance-ee.bg</p> <p>W: alliance-ee.bg</p> <p>A: Sofia, ul. 3 Tsar Ivan Shishman</p> <p>Vc. B, Fl 2</p> <p style="font-size: small;">G. Sofia, P.O. Box 1000, ul. "Tsar Shishman" No3, entr. B, mobile: +359 888 615358, E-mail: office@alliance-ee.bg, Website: http://alliance-ee.bg</p>	  <p>Briefly about BeSmart</p> <p><i>The Bulgarian Forum for Financing Energy Efficiency Projects:</i></p> <p>The transition to a low-carbon economy requires higher energy efficiency and better energy management, the introduction of new specialised services and the development of financial mechanisms. This exceptional challenge is particularly relevant in the building sector, where the currently used 100% grant mechanism for the renovation of multi-family residential buildings needs to be reformed into a more sustainable financing scheme that is socially acceptable, ensures the participation of vulnerable consumers and at the same time sets higher criteria for energy efficiency and environmental benefits.</p> <p><i>What are we aiming for?</i></p> <p>To help develop and implement policies and financial mechanisms to support investment in energy efficiency and to support the implementation of European sustainable energy development initiatives at national and local level.</p> <p><i>How will we achieve it?</i></p> <ul style="list-style-type: none"> - Involving all stakeholders in an open dialogue - Dissemination of good practices, initiatives and tools - By building an online communication platform for sharing knowledge and experience - With nine national roundtables with extensive media coverage - With specific recommendations for the development of financial instruments to support energy efficiency <p><i>Target groups:</i></p> <ul style="list-style-type: none"> - Banks, other financing institutions and ESCOs - Representatives of the central government, mainly from the ministries of finance, economy, energy, regional development and public works and the executive agencies belonging to them. - Local and regional authorities - National associations - construction, SMEs and industry associations, consumer associations and various service providers - Think tanks and academia - The general public and citizens - Media. <p style="font-size: small;">G. Sofia, P.O. Box 1000, ul. "Tsar Shishman" No3, entr. B, mobile: +359 888 615358, E-mail: office@alliance-ee.bg, Website: http://alliance-ee.bg</p>

 ALLIANCE ABOUT ENERGY EFFICIENCY  THE GLOBAL ESCO NETWORK  Signatory  
<p><i>Main benefits:</i></p> <ul style="list-style-type: none"> - Involving all stakeholders in an open dialogue - Dissemination of good practices, initiatives and tools - By building an online communication platform for sharing knowledge and experience - With nine national roundtables with extensive media coverage - With specific recommendations for the development of financial instruments to support energy efficiency  <p>This project has been funded with support from Horizon 2020 of the European Union by grant agreement No 101033787.</p> <p style="font-size: small;">G. Sofia, P.O. Box 1000, ul. "Tsar Shishman" No3, entr. B, mobile: +359 888 615358, E-mail: office@alliance-ee.bg, Website: http://alliance-ee.bg</p>

Working Group I:
Development of the ESCO market

Proposal to Upgrade the Envisaged ESCO mechanism in NRRF STAGE II

Concept for a pilot ESCO procedure

Summary

In view of the interest found by the Condominium to benefit from the ESCO mechanism for financing and implementing the process of renovation of Bulgarian homes within Stage II of the Recovery and Resilience Plan, as well as on the basis of the framework already set for ESCO option in the Guidelines for Applicants, we propose for prior coordination between stakeholders of a procedure, to provide a corridor for proactive citizens to reap the benefits of this innovative mechanism. We believe that this will partially alleviate the risk of non-utilization of grant resources and will give a horizon of action to initiative citizens in order to preserve the positive impetus created by the national programs for renovation of multifamily residential buildings.

The motivation for this proposal is the established desire of condominiums ("ETS") to take advantage of the advantages of the ESCO mechanism when applying for renovation of their buildings within STAGE II of the NPSU and the lack of clarity in municipal administrations to capacitively organize and conduct the processes that will lead to successful implementation of the envisaged ESCO option in the Guidelines for Applicants ("the Guidelines").

Unclear are the provisions in the main document of the Guidelines, where the ESCO mechanism is equated with that offered by financial institutions and utility companies. Although in Appendix 14 of the information package documents it is clearly explained that ESCOs are engineering ones, with the possibility of financing, there is no impression in the municipal administrations that they have an option to select an ESCO company when conducting the tender procedures within Stage II. Their focus remains on the selection of a construction works company (a company for construction and repair works), which do not offer in addition financing of the required 20% participation by ETS. As a result, the envisaged grant resource of 80% in Stage II may remain unused and lost. Due to the lack

G. Sofia, P.O. Box 1000, ul. "Tsar Shishman" No3, entr. B, mobile: +359 888 615358, E-mail: office@alliance-ee.bg, Website: <http://alliance-ee.bg>

G. Sofia, P.O. Box 1000, ul. "Tsar Shishman" No3, entr. B, mobile: +359 888 615358, E-mail: office@alliance-ee.bg, Website: <http://alliance-ee.bg>

a tender procedure for the selection of an ESCO company for the implementation of the renovation of the MWS within Stage II of the NPS.

- The lead partner conducts a tender procedure for the selection of an ESCO. Key points of the evaluation of ESCOs should be:
 - Cost of implementation;
 - Price of the provided credit resource / financing of the required deductible of 20%;
 - Amount of guaranteed energy savings;
 - Price of maintenance of the buildings for the duration of the contract;
 - Measurement and verification methodology
- Conducting an information session of ETS with the selected ESCO company and concluding a contract.
- Final agreement with MRDPW that the procedure is within the permissible Stage II of the NPSU and / or pilot will be supported by 80% grant resource in sandbox mode.
- Performance
- Maintenance of the block and payment of the investment by the owners of apartments of the ESCO company. If the guaranteed saving is not achieved, a downward adjustment of the payout to the ESCO company follows.

General scheme of the process:

G. Sofia, P.O. Box 1000, ul. "Tsar Shishman" No3, entr. B, mobile: +359 888 615358, E-mail: office@alliance-ee.bg, Website: <http://alliance-ee.bg>

G. Sofia, P.O. Box 1000, ul. "Tsar Shishman" No3, entr. B, mobile: +359 888 615358, E-mail: office@alliance-ee.bg, Website: <http://alliance-ee.bg>



Briefly about BeSMART

The Bulgarian Forum for Financing Energy Efficiency Projects:

The transition to a low-carbon economy requires higher energy efficiency and better energy management, the introduction of new specialised services and the development of financial mechanisms. This exceptional challenge is particularly relevant in the building sector, where the currently used 100% grant mechanism for the renovation of multi-family residential buildings needs to be reformed into a more sustainable financing scheme that is socially acceptable, ensures the participation of vulnerable consumers and at the same time sets higher criteria for energy efficiency and environmental benefits.

What are we aiming for?

To help develop and implement policies and financial mechanisms to support investment in energy efficiency and to support the implementation of European sustainable energy development initiatives at national and local level.

How will we achieve it?

- Involving all stakeholders in an open dialogue
- Dissemination of good practices, initiatives and tools
- By building an online communication platform for sharing knowledge and experience
- With nine national roundtables with extensive media coverage
- With specific recommendations for the development of financial instruments to support energy efficiency

Target groups:

- Banks, other financing institutions and ESCOs
- Representatives of the central government, mainly from the ministries of finance, economy, energy, regional development and public works and the executive agencies belonging to them.
- Local and regional authorities
- National associations - construction, SMEs and industry associations, consumer associations and various service providers
- Think tanks and academia
- The general public and citizens
- Media.

ENERGY EFFICIENCY ALLIANCE

Main benefits:

- Involving all stakeholders in an open dialogue
- Dissemination of good practices, initiatives and tools
- By building an online communication platform for sharing knowledge and experience
- With nine national roundtables with extensive media coverage
- With specific recommendations for the development of financial instruments to support energy efficiency

This project has been funded with support from Horizon 2020 of the European Union by grant agreement No 101033787.

G. Sofia, P.O. Box 1000, ul. "Tsar Shishman" No3, entr. B, mobile: +359 888 015356, E-mail: office@alliance-ee.bg, Website: <http://alliance-ee.bg>

ENERGY EFFICIENCY ALLIANCE

Working Group II:

Financial mechanisms and instruments contributing to the development of the market of energy efficient services (EES) and renewable energy sources (RES). Integration with the National Decarbonisation Fund (NDF) and other supporting financial platforms

Policy proposal

Upgrading and improving national policy and regulatory framework for energy communities¹

Summary

Energy communities (ENOs) represent an excellent opportunity for citizens, micro and small, non-profit and public sectors to join forces and reap the benefits of cheap and clean electricity generation. Although the first steps have already been taken in national legislation, there is still a lack of clarity on how to function, report, associate, etc. of the ENO, as well as specialized programs and financial instruments to facilitate their emergence.

The regional centres envisaged in the Recovery and Resilience Plan can play a key role and lead the process of forming the ENO by upgrading the portfolio of services offered to citizens and local entrepreneurs.

The definition of Energy Communities (ENOs) set out in national law closely reflects that in Directive (EU) 2018/2001 (RED II), without further clarification. The ENO is represented as an entity not bound by a certain legal structure, characterized by open and voluntary participation in it. Despite a number of positive productions in favor of ENOs, such as:

- Ability to produce, consume, store and sell surplus energy from renewable sources on equal terms in energy markets, including through power purchase agreements;
- Non-discriminatory access to all relevant energy markets;
- A clear commitment to sustainability and progress instead of financial gains;
- Ability to heat and cool, not just to produce and consume electricity,

¹ The policy was developed using the H2020 POWER-E-COM project: received funding from the European Union's Horizon 2020 research and innovation programme under Grant Agreement No. 101120998

G. Sofia, P.O. Box 1000, ul. "Tsar Shishman" No3, entr. B, mobile: +359 888 015356, E-mail: office@alliance-ee.bg, Website: <http://alliance-ee.bg>

ENERGY EFFICIENCY ALLIANCE

There are a number of ambiguities and gaps that need improvement and upgrade such as:

- Lack of methodologies for measurement and reporting of energy in ENO and application of principles for virtual/net measurement;
- Limited financial incentives such as preferential bank loans or targeted support mechanisms. Examples could be:
 - o Tax bonuses;
 - o Exemption from fees;
 - o Capital grants. Especially in the case of socially vulnerable groups;
 - o Other.
- Lack of good practices, demonstration projects and sufficient awareness among potential ENO members;
 - o Development of model contracts and forms;
 - o Free trainings for citizens;
 - o Other.
- The complex nature of administrative procedures, combined with the need for extensive technical and legal knowledge, pose significant challenges to citizens' initiatives in this area;
- Transition from non-discriminatory to preferential market access regime and infrastructure for ENOs;
- Free or subsidized connection and use of the electricity distribution network.

In order to streamline the process of entry of the ENO, regional centres for the provision of complex services need to expand the scope towards supporting the formation of energy communities by proposing

- Funding guidelines;
- Legal services;
- Energy audits;
- Leadership and support in the formation of communities;
- Other.

Briefly about BeSmart.

The Bulgarian Forum for Financing Energy Efficiency Projects:

G. Sofia, P.O. Box 1000, ul. "Tsar Shishman" No3, entr. B, mobile: +359 888 015356, E-mail: office@alliance-ee.bg, Website: <http://alliance-ee.bg>

ENERGY EFFICIENCY ALLIANCE

The transition to a low-carbon economy requires higher energy efficiency and better energy management, the introduction of new specialised services and the development of financial mechanisms. This exceptional challenge is particularly relevant in the building sector, where the currently used 100% grant mechanism for the renovation of multi-family residential buildings needs to be reformed into a more sustainable financing scheme that is socially acceptable, ensures the participation of vulnerable consumers and at the same time sets higher criteria for energy efficiency and environmental benefits.

What are we aiming for?

To help develop and implement policies and financial mechanisms to support investment in energy efficiency and to support the implementation of European sustainable energy development initiatives at national and local level.

How will we achieve it?

- Involving all stakeholders in an open dialogue
- Dissemination of good practices, initiatives and tools
- By building an online communication platform for sharing knowledge and experience
- With nine national roundtables with extensive media coverage
- With specific recommendations for the development of financial instruments to support energy efficiency

Target groups:

- Banks, other financing institutions and ESCOs
- Representatives of the central government, mainly from the ministries of finance, economy, energy, regional development and public works and the executive agencies belonging to them.
- Local and regional authorities
- National associations - construction, SMEs and industry associations, consumer associations and various service providers
- Think tanks and academia
- The general public and citizens
- Media.

Main benefits:

- Involving all stakeholders in an open dialogue
- Dissemination of good practices, initiatives and tools
- By building an online communication platform for sharing knowledge and experience
- With nine national roundtables with extensive media coverage
- With specific recommendations for the development of financial instruments to support energy efficiency

G. Sofia, P.O. Box 1000, ul. "Tsar Shishman" No3, entr. B, mobile: +359 888 615358, E-mail: office@alliance-ee.bg, Website: <http://alliance-ee.bg>

ENERGY EFFICIENCY ALLIANCE

This project has been funded with support from Horizon 2020 of the European Union by grant agreement No 101033787.

G. Sofia, P.O. Box 1000, ul. "Tsar Shishman" No3, entr. B, mobile: +359 888 615358, E-mail: office@alliance-ee.bg, Website: <http://alliance-ee.bg>

ENERGY EFFICIENCY ALLIANCE

Working Group III:

Recommendations to the Recovery and Resilience Plan (HEU) to achieve sustainable renovation of the building stock (residential and non-residential). Opportunities and Challenges for the Industrial Sector

Policy proposal

Alignment of EE projects with the international framework for investments with social impact¹

Summary

The transposition and establishment of international financial frameworks for investments with societal impact in the programming of financial instruments and EE mechanisms will ensure long-term access to cheap financial resources of Bulgarian financial institutions and agencies in the implementation of EE projects. This proposal aims to structure an initial framework for the evaluation and screening of an EE project, as well as a link to the UN Sustainable Development Goals (SDGs).

Last but not least, the adoption of societal impact criteria would put emphasis on EE projects implemented by NGOs that have traditionally difficult access to finance.

The main regulations developed at international level - such as the Principles for Responsible Investment, the Sustainable Development Goals (SDGs) in terms of equity investments and bonds, the European Taxonomy for Sustainable Activities and the Principles for Sustainable Bonds - provide clear guidance on the need to establish criteria for public impact assessment, with the possibility of embedding in financial instruments, national programmes and other EE financing mechanisms. The aim is to contribute positively to sustainable development and achieve the Sustainable Development Goals (SDGs), while offering different ways to achieve these goals.

Strengthening cross-sectoral cooperation at national and international level

¹ The policy was developed using the H2020 SER Hub project, received funding from the European Union's Horizon 2020 research and innovation programme under Grant Agreement No. 101024254

G. Sofia, P.O. Box 1000, ul. "Tsar Shishman" No3, entr. B, mobile: +359 888 615358, E-mail: office@alliance-ee.bg, Website: <http://alliance-ee.bg>

ENERGY EFFICIENCY ALLIANCE

Sustainable Development | Goals Specific Objectives

SDG 1: No Poverty Saving financial resources (crucial for socially vulnerable groups)

SDG 3: Good Health and Well-being Creating a healthier environment through energy renovation [interventions](#)

SDG 4: Quality Education Improving the skills and knowledge of building users/beneficiaries

SDG 7: Affordable and Clean Energy Promoting the use of clean and affordable energy [solutions](#)

SDG 8: Decent Work and Economic Growth Supporting economic [growth](#)

SDG 10: Reduced Inequalities Focusing on the renovation of buildings used by organizations working with vulnerable [groups](#)

SDG 11: Sustainable Cities and Communities Promoting community well-being through energy [renovation](#)

SDG 12: Responsible Consumption and Production Improving the circular economy and reducing waste by promoting best [practices](#)

SDG 13: Climate Action Promoting energy-efficient projects and sustainable energy [practices](#)

SDG 15: Life on Land Contributing to the sustainable use of natural resources and the conservation of [biodiversity](#)

SDG 16: Peace, Justice, and Strong Institutions Strengthening [institutions](#)









SDG 17: Partnerships for the Goals Enhancing cross-sectoral cooperation at national and international [levels](#)

The ultimate objective is to facilitate the financial analysis of EE projects/programming of EE mechanisms in the decision-making process to establish screening criteria for potential recipients of funding based on their ability to generate social and environmental benefits. In this regard, it is key to carry out a preliminary impact assessment of potential investments in order to (i) assess a potential material effect, (ii) make an informed choice between different investment options, (iii) optimize the impact results in accordance with the Impact Goals/SDG.

As part of the study and evaluation, a framework for assessing the capacity to generate positive social and environmental impact can be developed to guide the selection of EE projects. The evaluation framework can be upgraded on the basis of 5 impact strands, namely:

- Environmental impact
- Economic impact
- Community development
- Prosperity

G. Sofia, P.O. Box 1000, ul. "Tsar Shishman" No3, entr. B, mobile: +359 888 615358, E-mail: office@alliance-ee.bg, Website: <http://alliance-ee.bg>

    <p>• Awareness</p> <p>Indicator Measurement Unit</p> <p><i>Environment</i></p> <p>Delta energy consumption Difference in energy consumption before and after the intervention kWh</p> <p>Delta greenhouse gas emissions (scope 1 and 2) Difference in greenhouse gas emissions before and after the intervention tCO₂</p> <p>Indoor air quality Indoor air quality index (without indoor pollution) after the intervention index</p> <p><i>Economic</i></p> <p>Annual energy bill savings Annual costs for natural gas and electricity consumed by the building €/BGN</p> <p>Savings invested in core services/EE projects Percentage of savings generated from management costs reinvested in activities or projects on an annual basis €/BGN</p> <p># new employment contracts resulting from new services/increased number of beneficiaries New part-time and full-time positions created on an annual basis number</p> <p># new services/projects activated as a result of retrofitting New project or services initiated related to the project (total number) number</p> <p><i>Community</i></p> <p># new beneficiaries attracted Number of new beneficiaries reached compared to actual capacity number</p> <p>Opportunities for working with partner network Number of established relationships with local organizations (e.g., collaboration, partnership, etc.) number</p> <p>Participation of the local community Number of community members participating in the organization's activities on an annual basis number</p> <p>Sense of community belonging Perception of a sense of community belonging (mutual recognition) scale</p> <p><i>Well-being</i></p> <p>Psychological effects due to a healthier environment Perception of psychological effects by people living in the building scale</p> <p>Perceived indoor comfort Perception of indoor thermal comfort scale</p> <p style="text-align: right; font-size: small;">G. Sofia, P.O. Box 1000, ul. "Tsar Shishman" No3, entr. B, mobile: +359 888 615358, E-mail: office@alliance-ee.bg, Website: http://alliance-ee.bg</p>	    <p>Well-being of occupants Perception of the overall level of well-being by people living in the building scale</p> <p><i>Awareness</i></p> <p>Knowledge of sustainability Increased knowledge of sustainability scale</p> <p>Awareness related to sustainable behavior Increased awareness of sustainable behavior scale</p> <p>Awareness related to energy efficiency intervention Increased awareness of energy efficiency intervention scale</p> <p style="text-align: right; font-size: small;">G. Sofia, P.O. Box 1000, ul. "Tsar Shishman" No3, entr. B, mobile: +359 888 615358, E-mail: office@alliance-ee.bg, Website: http://alliance-ee.bg</p>
--	---

    <div style="text-align: center;">   </div> <p>Briefly about BeSmart</p> <p><i>The Bulgarian Forum for Financing Energy Efficiency Projects:</i></p> <p>The transition to a low-carbon economy requires higher energy efficiency and better energy management, the introduction of new specialised services and the development of financial mechanisms. This exceptional challenge is particularly relevant in the building sector, where the currently used 100% grant mechanism for the renovation of multi-family residential buildings needs to be reformed into a more sustainable financing scheme that is socially acceptable, ensures the participation of vulnerable consumers and at the same time sets higher criteria for energy efficiency and environmental benefits.</p> <p><i>What are we aiming for?</i></p> <p>To help develop and implement policies and financial mechanisms to support investment in energy efficiency and to support the implementation of European sustainable energy development initiatives at national and local level.</p> <p><i>How will we achieve it?</i></p> <ul style="list-style-type: none"> - Involving all stakeholders in an open dialogue - Dissemination of good practices, initiatives and tools - By building an online communication platform for sharing knowledge and experience - With nine national roundtables with extensive media coverage - With specific recommendations for the development of financial instruments to support energy efficiency <p><i>Target groups:</i></p> <ul style="list-style-type: none"> - Banks, other financing institutions and ESCOs - Representatives of the central government, mainly from the ministries of finance, economy, energy, regional development and public works and the executive agencies belonging to them. - Local and regional authorities - National associations - construction, SMEs and industry associations, consumer associations and various service providers - Think tanks and academia - The general public and citizens - Media. <p style="text-align: right; font-size: small;">G. Sofia, P.O. Box 1000, ul. "Tsar Shishman" No3, entr. B, mobile: +359 888 615358, E-mail: office@alliance-ee.bg, Website: http://alliance-ee.bg</p>	    <p><i>Main benefits:</i></p> <ul style="list-style-type: none"> - Involving all stakeholders in an open dialogue - Dissemination of good practices, initiatives and tools - By building an online communication platform for sharing knowledge and experience - With nine national roundtables with extensive media coverage - With specific recommendations for the development of financial instruments to support energy efficiency <div style="text-align: center;">  </div> <p>This project has been funded with support from Horizon 2020 of the European Union by grant agreement No 101033787.</p> <p style="text-align: right; font-size: small;">G. Sofia, P.O. Box 1000, ul. "Tsar Shishman" No3, entr. B, mobile: +359 888 615358, E-mail: office@alliance-ee.bg, Website: http://alliance-ee.bg</p>
---	---

ENERGY EFFICIENCY ALLIANCE

Working Group III:

Recommendations to the Recovery and Resilience Plan (HEU) to achieve sustainable renovation of the building stock (residential and non-residential). Opportunities and Challenges for the Industrial Sector

Policy proposal

Establishment of a permanent renovation program for residential buildings /without a 100% grant component/

Summary

In order to achieve the national targets for energy efficiency and renovation rate of residential buildings, in the Long-term National Strategy to support the renovation of the national building stock of residential and non-residential buildings by 2050 there is an acute need to change the model followed over the past 10 years, namely the termination of the practice of financing with a 100% grant. There are a number of defects that are being eliminated and the opportunities to achieve scale and higher ambition for decarbonisation when switching to a permanent programme that is based on a credit instrument and a grant component. Essential for success are: (i) conducting an information campaign for citizens, (ii) establishing a partnership with the Bulgarian Development Bank, as well as (iii) combining complementary programs and mechanisms.

It is necessary to establish a permanent financial mechanism to support the renovation of the housing stock that would combine a grant component and a specialized credit instrument to support owners' deductibles. In this way, equal access for all owners and associations of owners to financial resources for renovation should be ensured at any time when the investment intention arises.

In addition, it is crucial to financially secure and conduct a permanent communication campaign in support of energy efficiency policies, encouraging the application for implementation of projects with the support of the financial mechanism described in the previous paragraph.

G. Sofia, P.O. Box 1000, ul. "Tsar Shishman" No3, entr. B, mobile: +359 888 615358, E-mail: office@alliance-ee.bg, Website: <http://alliance-ee.bg>

G. Sofia, P.O. Box 1000, ul. "Tsar Shishman" No3, entr. B, mobile: +359 888 615358, E-mail: office@alliance-ee.bg, Website: <http://alliance-ee.bg>

ENERGY EFFICIENCY ALLIANCE

replacement of windows with energy efficient windows) will give a powerful impetus to accelerate the pace of deep renovation through the step-by-step method;

- 7) The establishment of a permanent programme (including deep renovation on the one hand and the implementation of single measures on the other) will eliminate the glaring injustice of the current programmes, which provide grant support for a small number of first-come, first-served buildings, leaving all others without any possibility of receiving support according to their needs and financial means;
- 8) The transformation of 100% grant funding programs will also overcome the even more glaring injustice, in which households with sufficiently high incomes receive a subsidy for renovation, and the vast majority of those most in need remain without any access to support because the funds do not reach their buildings. To overcome this injustice, 100% funding should remain only for the lowest income households;
- 9) The permanent program will also restore confidence in the renovation policies, which is currently totally exhausted due to the campaigning of the programs, the contradictory messages from the executive and the disappointment of the unapproved candidates for whom an alternative option is not provided;
- 10) The campaigning of existing programs in combination with 100% grant funding inevitably leads to controversial quality of all services in the investment process chain, suboptimal results and low efficiency of public investment.

G. Sofia, P.O. Box 1000, ul. "Tsar Shishman" No3, entr. B, mobile: +359 888 615358, E-mail: office@alliance-ee.bg, Website: <http://alliance-ee.bg>

G. Sofia, P.O. Box 1000, ul. "Tsar Shishman" No3, entr. B, mobile: +359 888 615358, E-mail: office@alliance-ee.bg, Website: <http://alliance-ee.bg>

ENERGY EFFICIENCY ALLIANCE

Resumption and financial provision of programmes successfully implemented in the past, e.g. REECF, to support single energy efficient measures would help to undertake initially a partial, if there is no possibility of a complete, renovation.

A logical choice for obtaining a mandate for the development and marketing of a financial instrument to support the self-participation of the owners' associations is the Bulgarian Development Bank in view of the fact that it is 100% state-owned and a natural conductor for supporting national policies.

The following is a non-exhaustive list of reasons in favour of this policy proposal:

- 1) The implementation of the current renovation programs is by no means the "right approach", which is evident from the results – with a huge public resource for 10 years a little over 4% of the multi-family buildings have been renovated, and for single-family buildings there is no active program;
- 2) There is no way to respond to the "big challenge facing our society"² – "how to accelerate the pace of energy renewal based on a long-term strategic approach"³ if we continue to give BGN 2 billion of limited public resources over 10 years to renovate 2,000 buildings from more than 66,000 multi-family and 1,200,000 single-family buildings;
- 3) The gradual increase in ownership self-participation, supported by the necessary financial and technical tools, has been embedded in building renovation strategies since 2016, but no government has dare to implement it since;
- 4) With the continuation of the current way of financing, we cannot even get closer to the target for 2030, set out in the current National Long-term Renewal Strategy and reaffirmed in the updated in 2024 Climate and Energy Plan, of over 19 million square meters. m. renovated living area . With collateral so far under the NPSU in the best case, a maximum of 5 million will be renewed. It is unclear how the remaining 14 million gross floor area (TBA) will be financed without attracting self-participation from the owners. After 2030, the targets increase significantly and without a sustainable funding mechanism their achievement will remain a chimera;
- 5) There are various international sources of funding outside the state budget that offer affordable financial resources for the implementation of renovation programs, but they do not allow 100% grant funding;
- 6) The willingness of the owners to participate in renovation programs, including with the provision of self-financing, cannot be questioned – this was proved both by the available applications under Stage II despite the entirely negative campaign, and by the data from the last census, which shows that the number of households that have invested in thermal insulation and energy-saving joinery, it has doubled in just 10 years. Urgent measures are needed to support owners' investment intentions not only with regard to deep renovation. Support for the implementation of single energy efficiency measures (e.g. individual

¹ https://brdreff.com/jeff_facilities/residential-bulgaria/

² Draft resolution of the National Assembly of the Republic of Bulgaria to continue the practice of renovation of the Ministry of Agriculture with a 100% grant.

³ idem

G. Sofia, P.O. Box 1000, ul. "Tsar Shishman" No3, entr. B, mobile: +359 888 615358, E-mail: office@alliance-ee.bg, Website: <http://alliance-ee.bg>

ENERGY EFFICIENCY ALLIANCE

Briefly about BeSout.

The Bulgarian Forum for Financing Energy Efficiency Projects:

The transition to a low-carbon economy requires higher energy efficiency and better energy management, the introduction of new specialised services and the development of financial mechanisms. This exceptional challenge is particularly relevant in the building sector, where the currently used 100% grant mechanism for the renovation of multi-family residential buildings needs to be reformed into a more sustainable financing scheme that is socially acceptable, ensures the participation of vulnerable consumers and at the same time sets higher criteria for energy efficiency and environmental benefits.

What are we aiming for?

To help develop and implement policies and financial mechanisms to support investment in energy efficiency and to support the implementation of European sustainable energy development initiatives at national and local level.

How will we achieve it?

- Involving all stakeholders in an open dialogue
- Dissemination of good practices, initiatives and tools
- By building an online communication platform for sharing knowledge and experience
- With nine national roundtables with extensive media coverage
- With specific recommendations for the development of financial instruments to support energy efficiency

Target groups:

- Banks, other financing institutions and ESCOs
- Representatives of the central government, mainly from the ministries of finance, economy, energy, regional development and public works and the executive agencies belonging to them.
- Local and regional authorities
- National associations - construction, SMEs and industry associations, consumer associations and various service providers
- Think tanks and academia
- The general public and citizens
- Media.

G. Sofia, P.O. Box 1000, ul. "Tsar Shishman" No3, entr. B, mobile: +359 888 615358, E-mail: office@alliance-ee.bg, Website: <http://alliance-ee.bg>

G. Sofia, P.O. Box 1000, ul. "Tsar Shishman" No3, entr. B, mobile: +359 888 615358, E-mail: office@alliance-ee.bg, Website: <http://alliance-ee.bg>

The logo for the Energy Efficiency Alliance, featuring a stylized 'A' and the text "ENERGY EFFICIENCY ALLIANCE".The flag of the European Union, consisting of twelve gold stars in a circle on a blue background.The BE SMART logo, featuring a stylized blue house icon above the text "BE SMART".

Main benefits:

- Involving all stakeholders in an open dialogue
- Dissemination of good practices, initiatives and tools
- By building an online communication platform for sharing knowledge and experience
- With nine national roundtables with extensive media coverage
- With specific recommendations for the development of financial instruments to support energy efficiency

The flag of the European Union, consisting of twelve gold stars in a circle on a blue background.

This project has been funded with support from Horizon 2020 of the European Union by grant agreement No 101033787.

G. Sofia, P.O. Box 1000, ul. "Tsar Shishman" No3, entr. B, mobile: +359 888 615358,
E-mail: office@alliance-ee.bg, Website: <http://alliance-ee.bg>

ANNEX II - INTERNAL ACTS OF THE AEE



Алианс за Енергийна Ефективност

Утвърждавам: _____
/Кирил Райчев/28.01.2022 г.
София

Сформирание на работни групи по проект BeSmart

/проект за предложение на Управителен съвет/

Във връзка с участието на Алианса за енергийна ефективност (АЕЕ) в проекта по Хоризонт 2020 BeSmart, който цели организация и провеждане на десет дискусийни форуми по теми, свързани с прехода на българската икономика към енергийна неутралност, както и разработка на препоръки в услуга на отговорните за този процес институции и органи в страната, се сформират следните работни групи за периода на изпълнение на проекта (април 2024 г.):

1. Работна група: „Развитие на ЕСКО пазара“
2. Работна група: „Финансови механизми и инструменти, способстващи развитието на пазара на енергоефективни услуги (ЕЕУ) и възобновяеми енергийни източници (ВЕИ). Интеграция с Националния декарбонизационен фонд (НДФ) и други способстващи финансови платформи“
3. Работна група: „Препоръки към Плана за възстановяване и устойчивост (ПВУ) за постигане на устойчиво обновяване на сградния фонд (жилищен и нежилищен). Възможности и предизвикателства пред индустриалния сектор“

I. Членове на работни групи

За членове и отговорници на работните групи се избират следните експерти:

Работна група „Развитие на ЕСКО пазара“:

- Кирил Райчев, Експерт ЕЕУ и ЕСКО „Еконолер Ес Ей“ ЕООД
- Александър Рангелов, Директор бизнес развитие, „Веоли Енерджи Сължуанс България“ ЕАД
- Севдалина Димбарска, Управител, „Енерджи Соливин“ ЕООД

гр. София, п.к. 1000, ул. „Цар Симеон“ №3, вк. Б, мобилни: +359 888 615358, ел. поща: office@alliance-ee.bg, интернет страница: <http://alliance-ee.bg>

Алианс за Енергийна Ефективност

- Станислава Димова-Маркова, адвокат, Адвокатска кантора „Маркова и Панчовска“

Отговорник: Станислава Димова-Маркова

Работна група „Финансови механизми и инструменти, способстващи развитието на пазара на енергоефективни услуги (ЕЕУ) и възобновяеми енергийни източници (ВЕИ). Интеграция с Националния декарбонизационен фонд (НДФ) и други способстващи финансови платформи:

- Марко Марков, Международен Експерт финансиране на ЕЕ и ВЕИ, „Еконолер Ес Ей“ ЕООД
- Христо Вълков, РМР, СГА, Партньор, Търбан Импакт Венчърс
- Кирил Райчев, Експерт ЕЕУ и ЕСКО „Еконолер Ес Ей“ ЕООД
- Благовест Ангелов, Изпълнителен директор, „Енерджи Ефект“ ЕАД

Отговорник: Марко Марков

Работна група „Препоръки към Плана за възстановяване и устойчивост (ПВУ) за постигане на устойчиво обновяване на сградния фонд (жилищен и нежилищен). Възможности и предизвикателства пред индустриалния сектор“:

- Михаел Делийски, Управител, „Енергофект Консулт“ ЕООД
- Цвета Наньова, Изпълнителен директор, „Българо-австрийска консултантска компания“ АД
- Севдалина Димбарска, Управител, „Енерджи Соливин“ ЕООД
- Кирил Райчев, Експерт ЕЕУ и ЕСКО „Еконолер Ес Ей“ ЕООД

Отговорник: Кирил Райчев

Съставът на работните групи е отворен за срока на тяхното съществуване. Създаването на нови работни групи, както и приеждането и утвърждаването на изменения в състава на съществуващите, се извършва съгласно устава на АЕЕ.

II. Цели и очаквани резултати

Работните групи има за цел да разработят препоръки за способстващи политики, експертни становища и/или аналитични доклади в съответната област на база изнесените презентации по време на дискусийните форуми и проведени дискусии. Общият брой документи ще бъдат разпространени сред отговорните агенции и институции в страната.

Основен акцент се очаква да бъде поставен върху (i) въвеждането способстващи трансформацията на българската икономика финансови схеми и платформи, (ii) усъвършенстване на практики, гарантиращи високо качество на доставяните ЕЕУ, както и върху (iii) действащите в страната национални планове и програми.

гр. София, п.к. 1000, ул. „Цар Симеон“ №3, вк. Б, мобилни: +359 888 615358, ел. поща: office@alliance-ee.bg, интернет страница: <http://alliance-ee.bg>

Алианс за Енергийна Ефективност

III. Начин на работа

По възможност членовете на работните групи ще присъстват по време на дискусийните форуми, за които ще бъдат уведомявани своевременно от председателя на АЕЕ и/или от съответните отговорници на работни групи. В допълнение водените по време на дискусиите бележки ще бъдат предоставяни на членовете в срок от не повече от 10 дни от датата на провеждане на съответното мероприятие. По този начин отсъстващите експерти ще могат също да се запознаят с ключовите моменти от проведените дискусии.

Предложения за политики, становища и мнения между експертите могат да се обменят по телефон, електронна поща или чрез други подходящи комуникационни канали, обязательно с подаване на информация и към съответния отговорник на работна група. По този начин отговорникът ще може да събира и систематизира цялата информация на едно място (споделяна папка - <https://1drv.ms/u/s!A4h07g6eC060UuG76Z9Uw7lp0w9g7e-C4quGk>).

В срок от не повече от три месеца след провеждане на даден дискусийнен форум отговорниците на работни групи организират среща на работната група (онлайн или присъствено), на която приемат или отхвърлят разработените за периода предложения за политики, становища и други. Крайните доклади се представят на следващия дискусийнен форум, както и до членовете и партньорите на проекта BeSmart.

По целесъобразност могат да се провеждат и съвместни срещи на работните групи с оглед постигане на съвместими решения по отношение на заложените хоризонталните цели (гаранции за качество, способстващи финансови схеми)

Управителен съвет:

Севдалина Димбарска: _____

Станислава Димова-Маркова: _____

Кирил Райчев: _____

Михаел Делийски: _____

гр. София, п.к. 1000, ул. „Цар Симеон“ №3, вк. Б, мобилни: +359 888 615358, ел. поща: office@alliance-ee.bg, интернет страница: <http://alliance-ee.bg>

Утвърждавам: _____
 /Кирил Райчев/

 30.08.2022 г.
 София

Актуализация на работни групи по проект BeSmart

/проект за предложение на Управителен съвет/

Във връзка с постъпили предложения относно структурата и състава на работните групи по проекта BeSmart, както и в допълнение на решение на УС на АЕЕ от 28.01.2022 за сформирание на работни групи, се създава нова работна група под наименованието:

„Интегрирани политики за устойчиво енергийно развитие“

Работните групи приемат следната структура:

1. Работна група: „Развитие на ЕСКО пазара“
2. Работна група: „Финансови механизми и инструменти, способстващи развитието на пазара на енергоефективни услуги (ЕЕУ) и възобновяеми енергийни източници (ВЕИ). Интеграция с Националния декарбонизационен фонд (НДФ) и други способстващи финансови платформи“
3. Работна група: „Препоръки към Плана за възстановяване и устойчивост (ПВУ) за постигане на събъщностно обновяване на градския фонд (жилищен и нежилищен). Възможности и предизвикателства пред индустриалния сектор“
4. Работна група: „Интегрирани политики за устойчиво енергийно развитие“

Новите членове на работни групи са:

Към РГ 1:

- Анна Прешелкова, Експерт Финанси, Овергаз

Към РГ 2:

гр. София, п.к. 1000, ул. "Цар Шишман" №3, вк. Б, мобилен: +359 888 615368,
 ел. поща: office@alliance-ee.bg, интернет страница: <http://alliance-ee.bg>

- Огнян Марковски, Главен експерт Схеми за финансиране на ЕЕ и ВИЕ, АУЕР

Към РГ 3:

- Звезда Кошничарова, Експерт Регистър и Експерт ОП, Камара на строителите в България
- Владислав Корчев, Експерт Икономика, Овергаз

Към РГ 4:

- Георги Базаджиев, Експерт Екология, Овергаз
- Драгомир Цанев, Изпълнителен директор, Енефект
- Кирил Райчев, Експерт ЕЕУ и ЕСКО, „Еконолер ЕС Ей“ ЕООД

I. Членове на работни групи

Работна група „Развитие на ЕСКО пазара“:

- Кирил Райчев, Експерт ЕЕУ и ЕСКО, „Еконолер ЕС Ей“ ЕООД
- Александър Рангелов, Директор бизнес развитие, „Воения Енерджи Сълюзънс България“ ЕАД
- Седалина Джабарска, Управител „Енерджи Сейминг“ ЕООД
- Станислава Димова-Маркова, адвокат, адвокатска кантора „Маркова и Панчовска“
- Анна Прешелкова, Експерт Финанси, Овергаз

Отговорник: Станислава Димова-Маркова

Работна група „Финансови механизми и инструменти, способстващи развитието на пазара на енергоефективни услуги (ЕЕУ) и възобновяеми енергийни източници (ВЕИ). Интеграция с Националния декарбонизационен фонд (НДФ) и други способстващи финансови платформи:

- Марко Марков, Международен Експерт финансиране на ЕЕ и ВИЕ, „Еконолер ЕС Ей“ ЕООД
- Христо Вълчев, РМР, СГА, Партньор, Ърбан Импакт Венчърс
- Кирил Райчев, Експерт ЕЕУ и ЕСКО, „Еконолер ЕС Ей“ ЕООД
- Благогест Ангелов, Изпълнителен директор, „Енерджи Ефент“ ЕАД
- Огнян Марковски, Главен експерт Схеми за финансиране на ЕЕ и ВИЕ, АУЕР

Отговорник: Марко Марков

гр. София, п.к. 1000, ул. "Цар Шишман" №3, вк. Б, мобилен: +359 888 615368,
 ел. поща: office@alliance-ee.bg, интернет страница: <http://alliance-ee.bg>

Работна група „Препоръки към Плана за възстановяване и устойчивост (ПВУ) за постигане на устойчиво обновяване на градския фонд (жилищен и нежилищен). Възможности и предизвикателства пред индустриалния сектор“:

- Михаел Делийски, Управител, „ЕнергоЕфект Консулт“ ЕООД
- Цвета Нанцова, Изпълнителен директор, „Българо-австрийска консултантска компания“ АД
- Седалина Джабарска, Управител „Енерджи Сейминг“ ЕООД
- Кирил Райчев, Експерт ЕЕУ и ЕСКО, „Еконолер ЕС Ей“ ЕООД
- Звезда Кошничарова, Експерт Регистър и Експерт ОП, Камара на строителите в България
- Владислав Корчев, Експерт Икономика, Овергаз

Отговорник: Кирил Райчев

Работна група: „Интегрирани политики за устойчиво енергийно развитие“:

- Георги Базаджиев, Експерт Екология, Овергаз
- Драгомир Цанев, Изпълнителен директор, Енефект
- Кирил Райчев, Експерт ЕЕУ и ЕСКО, „Еконолер ЕС Ей“ ЕООД

Отговорник: В процес на определяне

Съставът на работните групи е отворен за срока на тяхното съществуване. Създаването на нови работни групи, както и приемането и утвърждаването на изменения в състава на съществуващите, се извършва съгласно устава на АЕЕ.

II. Цели и очаквани резултати

Работните групи има за цел да разработят препоръки за способстващи политики, експертни становища и/или аналитични доклади в съответната област на база изнесените презентации по време на дискуссионните форуми и проведени дискусии. Общият брой документи с препоръки за политики в сектор ЕЕ/ВЕИ е осем. Създадените документи ще бъдат разпространени сред отговорните агенции и институции в страната.

Основен акцент се очаква да бъде поставен върху (i) въвеждането способстващи трансформацията на българската икономика финансови схеми и платформи, (ii) усъвършенстване на практики, гарантиращи високо качество на доставяне ЕЕУ, както и върху (iii) действащите в страната национални планове и програми.

гр. София, п.к. 1000, ул. "Цар Шишман" №3, вк. Б, мобилен: +359 888 615368,
 ел. поща: office@alliance-ee.bg, интернет страница: <http://alliance-ee.bg>

III. Начин на работа

По възможност членовете на работните групи ще присъстват по време на дискуссионните форуми, за които ще бъдат уведомявани своевременно от председателя на АЕЕ и/или от съответните отговорници на работни групи. В допълнение водените по време на дискусиите бележки ще бъдат предоставяни на членовете в срок от не повече от 10 дни от датата на провеждане на съответното мероприятие. По този начин отсъстващите експерти ще могат също да се запознаят с ключовите моменти от проведените дискусии.

Предложения за политики, становища и мнения между експертите могат да се обменят по телефон, електронна поща или чрез други подходящи комуникационни канали, obligatno с подаване на информация и към съответния отговорник на работна група. По този начин отговорникът ще може да събира и систематизира цялата информация на едно място (споделяна папка - <https://1drv.ms/u/s!Ahtj7geO60uH6782buW7lp0wqg?e=C4quGk>).

В срок от не повече от три месеца след провеждане на даден дискуссионен форум отговорниците на работни групи организират среща на работната група (онлайн или присъствено), на която приемат или отваряват разработените за периода предложения за политики, становища и други. Крайните доклади се представят на следващия дискуссионен форум, както и до членовете и партньорите на проекта BeSmart.

По целесъобразност могат да се провеждат и съвместни срещи на работните групи с оглед постигане на съвместими решения по отношение на законите хоризонталните цели (гаранции за качество, способстващи финансови схеми)

Управителен съвет:

Седалина Джабарска: _____

Станислава Димова-Маркова: _____

Кирил Райчев: _____

Михаел Делийски: _____

гр. София, п.к. 1000, ул. "Цар Шишман" №3, вк. Б, мобилен: +359 888 615368,
 ел. поща: office@alliance-ee.bg, интернет страница: <http://alliance-ee.bg>

ANNEX III - MEETING MINUTES

Дата:

28.02.2022 г./София

Протокол от среща

Работни групи по проект BeSmart

На 28.02.2022 г. (понеделник) се проведе работна среща на ръководителите на новосформираните работни групи по проекта BeSmart (Решение на УС на АЕЕ / 28.01.2022). Срещата протече при следния дневен ред:

- (1) Утвърждаване на първоначален списък с предложения за създаване на политики

Кирил Райчев представи за утвърждаване от ръководителите на работни групи на първоначален списък предложения за политики, поддани от членовете на консорциума BeSmart, членовете на Алианс за енергийна ефективност, представители на Агенцията за устойчиво енергийно развитие, членове на работните групи, представители на проекта FinEERGO-Dom за България и други партньори.

Участниците в срещата еднодушно приеха, че така подготвеният списък напълно отговаря на целите на проекта. Беше направено уточнението, че списъкът ще остане отворен за допълнения до завършването на проекта.

- (2) Организация на работа на работните групи

С цел постигане на максимална полза от експертизата на членовете на работните групи беше дискутирана възможността създадените политики да бъдат представяни на общи срещи на работните групи за обратна връзка и коментари. Допълнителна полза от организирането на общи срещи би била възможността за обмен на идеи в по-широк състав, което би увеличило шансовете за генериране на политики с още по-високо качество.

Участниците на срещата възприеха концепцията за периодична организация на общи срещи на работните групи, които ще подкрепят на протоколирано, директно дискутиране в работните групи ще протичат в неформален порядък, във виде формат и честота в зависимост от активните членове по дадена политика в процес на разработка.

гр. София, п.к. 1000, ул. "Цар Шишман" №3, вк. Б, мобилен: +359 888 615358, ел. поща: office@alliance-ee.bg, интернет страница: <http://alliance-ee.bg>

(3) Разни

На срещата бяха дискутирани и се взе решение и по отношение на следните въпроси:

- Разработените политики ще се публикуват на страниците на Алианс за енергийна ефективност и проекта BeSmart.
- При възникване на спорове, на марочна среща ръководителите на работни групи ще вземат окончателно решение по отношение на крайния резултат, предмет на спора.
- Ръководителите на работни групи ще бъдат активни в приличането на нови членове на работните групи
- Ръководителите на работни групи ще бъдат активни в получаването на обратна връзка и популяризирането на създадените политики

Приложения:

Първоначален списък с предложения за създаване на политики от работните групи по проекта BeSmart.

гр. София, п.к. 1000, ул. "Цар Шишман" №3, вк. Б, мобилен: +359 888 615358, ел. поща: office@alliance-ee.bg, интернет страница: <http://alliance-ee.bg>

Дата:

27.05.2022 г./София

Протокол от среща

Работни групи по проект BeSmart

На 27.05.2022 г. (петък) се проведе работна среща на работните групи по проекта BeSmart. Съвместното провеждане на срещата спомогна за по-широка експертна дискусия и откриване на възможности за допълване на предложените политики. Срещата протече при следния дневен ред:

- (1) Представяне и разглеждане на списък от 15 теми, които представляват интерес за детайлно изследване и имат сечение с целите на проекта BeSmart.

Списъкът с предложените беше принет след кратка дискусия и отразяване на част от направените предложения.

- (2) Представяне и разглеждане на предложение за политика от страна на Работна група I – Развитие на ЕСКО пазара

След кратка дискусия политиката беше одобрена от участниците на работната среща.

- (3) Представяне и разглеждане на предложение за политика от страна на Работна група II – Финансови механизми и инструменти, способстващи развитието на пазара на енергоефективни услуги (ЕЕУ) и възстановяване енергийни източници (ВЕИ). Инициатива с Национална денарбонизационен фонд (НДФ) и други способстващи финансови платформи

След кратка дискусия политиката беше одобрена от участниците на работната среща.

- (4) Представяне и разглеждане на предложение за политика от страна на Работна група III – Препоръки към Плана за възстановяване и устойчивост (ПВУ) за постигане на устойчиво обновяване на сградния фонд (жилищен и нежилищен). Възможности и предизвикателства пред индустриалния сектор

След кратка дискусия политиката беше одобрена от участниците на работната среща.

гр. София, п.к. 1000, ул. "Цар Шишман" №3, вк. Б, мобилен: +359 888 615358, ел. поща: office@alliance-ee.bg, интернет страница: <http://alliance-ee.bg>

(5) Разни

Членовете на работните групи се обединиха около следващите теми за по-детайлно разглеждане и предложения за политики, а именно:

- Актуализация на Наредба 16-347
- Разширено използване на опцията систематен диалог за избор на ЕСКО изпълнителя

Приложения:

Списък предложения за политики

Предложение за политика от Работна група 1

Предложение за политика от Работна група 2

Предложение за политика от Работна група 3

гр. София, п.к. 1000, ул. "Цар Шишман" №3, вк. Б, мобилен: +359 888 615358, ел. поща: office@alliance-ee.bg, интернет страница: <http://alliance-ee.bg>

Дата:

21.09.2022 г./София

Протокол от среща

Работни групи по проект BeSmart

На 21.09.2022 г. (сряда) се проведе работна среща на работните групи по проекта BeSmart. Съвместното провеждане на срещата спомогна за по-широка експертна дискусия и подготовка за представяне на Техническите работни групи на Кръглата маса в Старосел, гр. Габрово на 26.09.2022 г. Срещата протече при следния дневен ред:

- (1) Преглед на политиките за представяне на кръглата маса на 26-27.09./Старосел

Кирил Райчев представи до момента разработените предложения за политики, в т.ч. и ново предложение от РГ 3 – „Пътна карта за обновяване на многофамилните жилищни сгради“, както и подготвена презентация за представяне на Техническите групи на Кръглата маса в Старосел.

Участниците в срещата изразиха положителни становища към представените материали.

- (2) Избор на теми за разработка във вид на политики

Бяха представени две предложения за разработка на политики в рамките на Работна група 4 („Интегрирани политики за устойчиво енергийно развитие“) от страна на г-н Георги Базджиев:

- Децентрализация на производството, преноса и разпределението на електро и топлинна енергия, чрез масово въвеждане на когенерации и ВЕИ;
- Въвеждане на интегрирани енергофитивни системи за отопление при крайните потребители с използване на локални ВЕИ и с интелигентни системи за измерване на енергията.¹

¹ 1. Обнова: Загубите на първична енергия при производството на електроенергия от въглища са около 66%, ако заменим въглищата с газ загубите ще намалат до 40%. Ако пренесем производството в района и локални топосендтрали с когенерации и ВЕИ за БГВ през лятото, загубите на първична енергия ще намалат до 35%.
2. И без моят предложение наблюдавам, даже и по саята, съчетаване на термомола с пелетен/газов котел и помпата и слънчев панел. Това е конкретен случай, но ако искаме да се готвим

гр. София, п.к. 1000, ул. "Цар Шишман" №3, вх. Б, мобилен: +359 888 615358, ел. поща: office@alliance-ee.bg, интернет страница: <http://alliance-ee.bg>

В рамките на обсъжданата г-жа Цвета Наменова запозна участниците в срещата със статуса на разработките по проекта SHEERepo – метода за определяне на енергийна бедност и др.

- (3) Разни

Кирил Райчев запозна участниците, че към момента се завършва предложението за политика „Трайни процедури за ЕКО. Съвместен диалог“ от РГ 1 (Развитие на ЕКО пазар).

Приложения:

Доклад за извършеното до момента - презентация

Предложение за политика от Работна група 3 – „Пътна карта за обновяване на многофамилните жилищни сгради“

за постигане на 50% дял на ВЕИ в сградите с близо до нулевото енергийно потребление трябва постепенно да проектираме и внедряваме интегрирани системи за отопление и БГВ с ВЕИ. Относно smart метрите и в момента всички газоразпределителни дружества монтират smart разходомери, които позволяват на крайните потребители реално да управляват енергопотреблението си. Време е и ЕПГ да последват примера.

гр. София, п.к. 1000, ул. "Цар Шишман" №3, вх. Б, мобилен: +359 888 615358, ел. поща: office@alliance-ee.bg, интернет страница: <http://alliance-ee.bg>

Дата:

29.09.2023 г./София

Протокол от среща

Работни групи по проект BeSmart

На 29.09.2023 г. (петък) се проведе работна среща на работните групи по проекта BeSmart. Съвместното провеждане на срещата спомогна за по-широка експертна дискусия и подготовка за представяне на Техническите работни групи на Кръглата маса в гр. София на 05.10.2023 г. Срещата протече при следния дневен ред:

- (1) Утвърждаване на последното предложение за политика;
- (2) Доклад за извършеното до момента
- (3) Дискусия относно представяне на резултатите от работата на работната група на кръглата маса на 05.10.2023.
- (4) Разни.

Приложения:

Предложение за политика от Работна група 1 – „ПРОГРАМИРАНЕ НА ЕКО СЪС СУБСИДИИ. Добри практики от Централна и Източна Европа: Чехия, Полша, Латвия. Фокус върху многофамилни жилищни сгради.“

гр. София, п.к. 1000, ул. "Цар Шишман" №3, вх. Б, мобилен: +359 888 615358, ел. поща: office@alliance-ee.bg, интернет страница: <http://alliance-ee.bg>

Дата:

15.11.2023 г./София

Протокол от среща

Работни групи по проект BeSmart

На 15.11.2023 г. (сряда) се провежда работна среща на работните групи по проекта BeSmart. Съвместното провеждане на срещата спомогна за по-широка експертна дискусия и подготовка за представяне на Техническите работни групи на Кръглата маса в гр. София на 27.11.2023 г. Срещата протече при следния дневен ред:

(1) Дискусия относно подобренията и извадките в предложенията от МГ ЕСКО наредба.

Ключово моменти:

- Според нас е премахната ролята на централния бюджет, който „захранва“ публичните субекти с финансови средства;
- Не виждаме как е възможно да се изпълни чл.12, ал.(1), т.3:
 3. **предвиденият в договора с гарантиран резултат срок на изплащане на инвестицията за енергийни спестявания да бъде не по-дълъг от простия срок на откупуване на пакета от мерки, предвидени в договора.**
- Не виждаме логика и в следното изключение на чл.12, ал.(2). Ако се визира финансиране от страна на централния бюджет, може би има смисъл, но не е такъв случай в ал.(1)
 - (2) **Включените в предмета на договора с гарантиран резултат възстановителни и/или съматрични дейности, които гарантират експлоатационната годност на мерките на повишаване на енергийната ефективност, не подлежат на финансиране по реда на ал. 1.**
- Други направени предложения в първата версия с предложения за промени (прикачена).

(2) Подготовка за следващият предложения за промени.

гр. София, п.к. 1000, ул. "Цар Шишман" №3, вх. Б, мобилен: +359 888 615358, ел. поща: office@alliance-ee.bg, интернет страница: <http://alliance-ee.bg>

гр. София, п.к. 1000, ул. "Цар Шишман" №3, вх. Б, мобилен: +359 888 615358, ел. поща: office@alliance-ee.bg, интернет страница: <http://alliance-ee.bg>

Дата:

19.01.2024 г./София, Бизнес център „SOHO“

Протокол от среща

Работни групи по проект BeSmart

На 19.01.2024 г. (петък) се провежда работна среща на работните групи по проекта BeSmart. Съвместното провеждане на срещата спомогна за по-широка експертна дискусия и подготовка за представяне на Техническите работни групи на Кръглата маса в гр. София на 30.01.2024 г. Срещата протече при следния дневен ред:

(1) Резюме на изготвеното до момента

Лидерите на работни групи докладваха за напредъка до момента

(2) Политики в процес на изготвяне/кандидати за изготвяне:

- а. Успешни подходи за информираност и публичност
- б. Други

(3) Дискусия/предложения

Беше направен кратък обзор на предложенията от кръглите маси и определени за разработка следващи предложения за политики.

Приложения:

Предложение за политика от Работна група 1 – „Предложение за надграждане на предвидения ЕСКО механизъм в НПВУ ЕТАП II. Концепция за пилотна ЕСКО процедура“

гр. София, п.к. 1000, ул. "Цар Шишман" №3, вх. Б, мобилен: +359 888 615358, ел. поща: office@alliance-ee.bg, интернет страница: <http://alliance-ee.bg>

Дата:

17.04.2024 г./София

Протокол от среща

Работни групи по проект BeSmart

На 17.04.2024 г. (сряда) се провежда последна работна среща на работните групи по проекта BeSmart. Съвместното провеждане на срещата спомогна за по-широка експертна дискусия и подготовка за представяне на Техническите работни групи на Кръглата маса в к.к. Чифлика на 24.04.2024 г. Срещата протече при следния дневен ред:

(1) Преглед и одобрение на предложения за политики

(2) Обзор на изготвеното по проекта

(3) Утвърждаване на доклад за последната кръгла маса

(4) Разни

Приложения:

Доклад за извършеното до момента - презентация

Предложение за политика от Работна група 2 – „Надграждане и подобряване на националната политическа и регулаторна рамка за енергийни общности“

Предложение за политика от Работна група 3 – „Привеждане на проектите за ЕЕ в съответствие с международната рамка за инвестиции с обществено въздействие“

Предложение за политика от Работна група 3 – „Създаване на постоянно действаща програма за обновяване на жилищни сгради без 100% грант“

гр. София, п.к. 1000, ул. "Цар Шишман" №3, вх. Б, мобилен: +359 888 615358, ел. поща: office@alliance-ee.bg, интернет страница: <http://alliance-ee.bg>

ANNEX IV – EXTERNAL REPORT ON THE STATUS OF TWGS

<p style="text-align: center;">Технически Работни Групи</p> <p>Доклад за извършеното до момента Кирил Райчев Габрово 26.09.2022</p>	<p style="text-align: center;">СЪЗДАДЕНИ РАБОТНИ ГРУПИ (РГ)</p> <ol style="list-style-type: none"> 1) РГ1: Развитие на ЕСКО пазара <ul style="list-style-type: none"> □ 5 членва 2) РГ2: Финансови механизми и инструменти. <ul style="list-style-type: none"> □ 5 членва 3) РГ3: Препоръки към ПВУ... <ul style="list-style-type: none"> □ 6 членва 4) РГ4: Интегрирани политики за устойчиво енергийно развитие <ul style="list-style-type: none"> □ 3 членва
<p style="text-align: center;">НАЧИН НА РАБОТА</p> <ul style="list-style-type: none"> ○ Отворен списък с предложение за разработка на политики <ul style="list-style-type: none"> □ 25+ броя предложение към днешна дата ○ Всяка работна група трябва да има ръководител <ul style="list-style-type: none"> □ РГ1-РГ3 имат ръководител □ РГ4 няма ○ Споделена папка OneDrive ○ Мейлинг група ○ Регулярни онлайн срещи и директни взаимодействия ○ Споделени материали в РГ <ul style="list-style-type: none"> □ разработени политики □ протоколи от проведени кръгли маси, □ работни срещи, □ използвани материали 	<p style="text-align: center;">РАЗРАБОТЕНИ ПОЛИТИКИ (4 предложения)</p> <ol style="list-style-type: none"> 1) РГ1: Развитие на ЕСКО пазара (1 политика) <ul style="list-style-type: none"> □ Създаване на национален интерактивен публичен ЕСКО регистър 2) РГ2: Финансови механизми и инструменти (1 политика) <ul style="list-style-type: none"> □ Създаване на работен сегмент към МДФ с капацитет да взаимодейства с иновативни модели за реализация на ЕЕ/ВЕИ проекти от типа на ЕСКО 3) РГ3: Препоръки към ПВУ... (2 политики) <ul style="list-style-type: none"> □ Въвеждане на облекчаващи финансовата тежест постановки при програмиране на ПВУ в частта на МЖС □ Нюта карта за обновяване на многофамилните жилищни сгради 4) РГ4: Интегрирани политики за устойчиво енергийно развитие (0 политики) <ul style="list-style-type: none"> □ -
<p style="text-align: center;">Предложение за политика</p> <p>Създаване на национален интерактивен публичен ЕСКО регистър</p> <p>Работна група 1: Развитие на ЕСКО пазара</p>	<p style="text-align: center;">Европейски ЕСКО Кодекс Версия 1.0</p> <p>Списък на доставчиците на енерго-ефективни услуги, одобрени български професионалисти, за доставка с гаранционен срок</p> <p>Споделени от доставчиците на енерго-ефективни услуги</p> <ul style="list-style-type: none"> □ Ценности: <ul style="list-style-type: none"> • прозрачност, професионализъм... □ Принципи: <ul style="list-style-type: none"> • ЕСКО гарантира спестяванията, ЕСКО финансира...
<p style="text-align: center;">ЕСКО регистър Версия 2.0</p> <ol style="list-style-type: none"> 1) Корпоративен модул (регистрация на доставчици на ЕЕУ) <ul style="list-style-type: none"> □ Импълмента проекти и референтни □ Искровен систем □ Финансови показатели □ Обучение □ Въвеждат стандарти за управлението 2) Проектен Модул (регистрация, мониторинг и контрол на проекти) <ul style="list-style-type: none"> □ Технически критерии □ Финансови критерии □ Правни критерии □ Управлението на риска □ ESG 	<p style="text-align: center;">Предложение за политика</p> <p>Създаване на работен сегмент към МДФ с капацитет да взаимодейства с иновативни модели за реализация на ЕЕ/ВЕИ проекти от типа на ЕСКО</p> <p>Работна група 2: Финансови механизми и инструменти, способстващи развитието на пазара на енергоефективни услуги (ЕЕУ) и възобновяеми енергийни източници (ВЕИ). Интеракция с Националния декарбонизиращ фонд (НДФ) и други способстващи финансови платформи</p>
<p style="text-align: center;">Финансови параметри</p> <ol style="list-style-type: none"> 1) Енергийни спестявания като основно обезпечение вместо земя, ипотека и други подобни; 2) 15-20 год. срокове на кредитиране; 3) Преференциални дисконтови проценти, лихви; 4) Застраховка на вземания. 	<p style="text-align: center;">Партньорства с бенефициенти</p> <ol style="list-style-type: none"> 1) Организация и управление на проектни пулове; <ul style="list-style-type: none"> □ Структуриране на проекти □ Процедура за подбор на компании-изпълнители □ Тържни процедури □ Контрол на качеството 2) Безвъзмездни консултации; 3) Субсидии за предпроектни проучвания.
<p style="text-align: center;">Предложение за политика</p> <p>Въвеждане на облекчаващи финансовата тежест постановки при програмиране на ПВУ в частта на МЖС</p> <p>Работна група 3: Въвеждане на облекчаващи финансовата тежест постановки при програмиране на ПВУ в частта на МЖС</p>	<p style="text-align: center;">Подпомагане на I-ва фаза на обновяване на МКЖ – 100% грант за изпълнение на ЕСМ</p> <ol style="list-style-type: none"> 1) ЕСКО компанията изготвя за своя сметка предпроектното проучване след избора ѝ за изпълнител по регламентирана процедура; 2) Етажната собственост и ЕСКО компанията кандидатстват за финансиране; 3) Изпълнение; 4) ЕСКО компанията гарантира постигане на енергийните спестявания.

Подпомагане на II-ра фаза на обновяване на МЖС – 80% грант за изпълнение на ЕСМ



- 1) ЕСКО компанията изготвя за своя сметка предпроектното проучване след избора й за изпълнител по регламентирана процедура;
- 2) Етажната собственост и ЕСКО компанията кандидатстват за финансиране;
- 3) ЕСКО компанията съфинансира и 20%, които са необходими за реализация на ЕСМ
- 4) Изпълнение;
- 5) ЕСКО компанията гарантира постигане на енергийните слествания.

Предложение за политика



Пътна карта за обновяване на многофамилните жилищни сгради

Работна група 3: Въвеждане на облакчаващи финансовата тежест постановки при програмиране на ПВУ в частта на МЖС

TECHNICAL WORKING GROUPS

09.12.2019 10:00 AM

Дългосрочна стратегия vs. ПВУ



- 1) Обновена площ: 19,026,656 м² vs. 3,688,979 м²
- 2) Обновени сгради: 64,056 vs.1,135
- 3) Финансов ресурс: 4x повече необходим vs. 100% грант

Оптимизация и надграждане на ПВУ



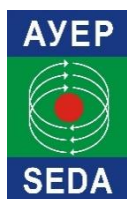
- 1) Прекратяване на 100-процентово безвъзмездно финансиране;
- 2) Намаляване на публичното финансиране след изпълнение на проект за към НПВУ с 2,25% на годишна база;
- 3) Отделяне на 7% от публичните средства за мониторинг, комуникация, обучения и научни изследвания;
- 4) Запазване на 100% финансиране на енергийно бедни домакинства;
- 5) Постепенно намаляване на субсидията от 100% до 20% до 2030 г.

TECHNICAL WORKING GROUPS

09.12.2019 10:00 AM

TECHNICAL WORKING GROUPS

09.12.2019 10:00 AM



АЛИАНС ЗА ЕНЕРГИЙНА ЕФЕКТИВНОСТ

