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**Omsorgsbygg Oslo KF**

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## **PUBLIC CONSULTATION, REPLY FROM A PUBLIC AUTHORITY**

We are much obliged to reply to the consultation paper on "Financial Support for Energy Efficiency in Buildings". The Municipal Undertaking for Social Service Buildings (Omsorgsbygg) is a public building owner who owns, manages, and develops municipal facilities. Our portfolio consists of more than 1000 buildings with approximately 900 000 m<sup>2</sup>, which includes nursing homes, kindergartens, health care centers, fire stations, senior citizens community centers, leisure properties, office and commercial buildings, museums, and youth clubs.

The barriers against realizing the potential for energy efficiency in buildings outlined in the consultation paper are to a large extent present. We would like to emphasize the importance of the following barriers:

- Market failure
  - Information and knowledge about concepts and a lack of clear definitions of different energy efficiency levels and standards. Standardization of concepts.
  - Information and knowledge about technology and methodology of energy efficiency with the industry, decision makers, and building owners.
  - The owner/tenant dilemma, especially when it comes to development of existing buildings in use.
- Financial barriers
  - Information and knowledge with decision makers allocating public funds for maintenance and development of public buildings.
  - Lack of reliable proof of the profitability of energy efficiency measures on buildings without deep rehabilitation (measures implemented while building in use).
  - Difficulties of allocating funds from operating budget to investment budget in order to achieve lower operating costs.
- Regulatory framework
  - Lack of clear definitions of concepts and energy efficiency levels.

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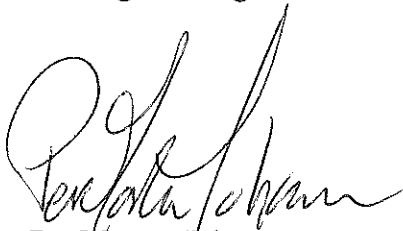
- Listed buildings and technical difficulties in preserving the buildings and at the same time do modifications to make them more energy efficient.

There are a lot of different technologies and methods available to do energy efficiency measures. It is in fact overwhelming. Combined with different concepts such as Passivhaus standard, Passivhaus level, nZEB/ZEB and different forms of energy use classifications (both national and international such as BREEAM or LEAD), this entails difficulties on deciding on solutions to tap the potential of energy efficiency and to reach consensus in the industry and policy makers. A clear definition, and standardization, of the different concepts would be useful.

The vast majority of the potential for energy efficiency lies with the buildings that are in use, and not in need of rehabilitation. These buildings constitute almost the entire building stock. There is a great need to find cost effective solutions to make these buildings more energy efficient. Another barrier linked to this is the ability of the funding authorities to make cohesion efforts to eliminate the owner/tenant dilemma. Both the owner and the tenant funding comes from the same budget, but there is a challenge in allocating money from the operating budget to the investment budget in order to lower the operating costs. Energy performance contracts is a possible solution to this challenge when it comes to new buildings or deep rehabilitation, but this is not feasible when it comes to the vast majority of existing buildings that are in use. Here the funding goes to maintenance (to keep the buildings in present condition) and not to investment budgets (to rise the standard of the building).

We see an urgent need for piloting energy efficiency measures (step-by-step renovation) on existing building stock to be able to demonstrate the profitability of the measures. Without clear and credible calculations that are proven in reality it is difficult to convince decision makers of spending money on such efforts. To facilitate this there should be some kind of funding scheme for small scale pilot projects of this nature. In addition to best practice sharing within the EU with detailed calculations.

There is also a lack of incentives to be frontrunners within the area of energy efficiency for public building owners. As stricter regulations regarding energy efficiency are to come, there is no need to implement these (as they are cost-driving) before the regulations are implemented, thus not enabling us to reap the benefits of experience in energy efficiency projects before regulations are introduced. It is also imperative that coming regulations also address the existing building stock.



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