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## **Views from the Swedish Union of Tenants on European Energy Regulation: A Bridge to 2025 – Public Consultation Paper**

### **Introduction**

The Swedish Union of Tenants is devoted to making sure everyone has the right to good housing at an affordable cost. We promote better housing for the tenants of today and tomorrow.

Our vision is secure housing that promotes human and social development. Housing is one of the most important aspects of people's everyday lives. The issue of housing affects us all, no matter where and how we live. Access to housing, tenant influence, reasonable rents, a sense of neighbourhood and well-managed housing environments are all important aspects of good, secure housing. Creating good conditions for tenants is crucial for a well-functioning society.

Good housing at a reasonable cost is one of the cornerstones for achieving sustainable development. Sustainable energy consumption and lower carbon dioxide emissions are in this regard also important. Sustainable development means that economic, ecological and societal development harmonizes. This should be a basic guidance when instruments and regulatory frameworks are being developed.

### **Swedish Union of Tenants views**

- We believe it is important to have a holistic approach when instruments and regulations are developed within the energy sector. This approach requires a balanced analysis of the need and requirements for reduced energy use, reduced carbon emissions and a higher share of renewable energy and how these goals interact with each other and a sustainable development.
- It is crucial that EU-level policies take into account the very different conditions in energy sectors and buildings across Europe. The consequences of not doing so could amount to very negative developments where rents and energy costs soar too high

for tenants. This could lead to for example further segregation, increasing poverty and inequality.

- Energy regulation should be developed with the consumer interest at heart. Basic consumer needs are environmentally sound, delivery safe energy at a reasonable cost. Crucial to the development of an integrated European energy market is that the benefits must be proportionate to the cost, and this should be thoroughly investigated.
- The consumer collective is not homogeneous. Some consumers will certainly be quick to use a variety of new technology and the new services that will arrive. Systems must however allow consumers to join at a much later stage – in other words they must be future-proof and robust. This is important to protect the most vulnerable consumers.
- The development of smart grids must not become a testing ground where energy companies are making huge investments to questionable benefits with huge costs transferred to electricity consumers.
- Privacy is a key question - what will the energy companies do with all the information about the customers?
- It is very important that consumers are not forced into various services on the energy markets.
- In energy markets where the knowledge gap between energy companies and consumers are huge it is very important that regulators – both at national and EU-level – have the right authority to act in order to facilitate reasonable energy costs. This should be a guiding principle for all regulation on the energy markets.



*/Barbro Engman, president of the Swedish union of tenants/*



*/Hans Dahlin, energy and environmental expert of the Swedish union of tenants/*