



Germany

BACKGROUND

- › **No official definition** of energy poverty in Germany: energy poverty is seen as a manifestation of poverty in itself. There is **no regular official survey** either to assess and monitor the extent of energy poverty in Germany.
- › The Federal government keeps a comprehensive approach to poverty alleviation. Specific funding or policies about energy poverty are thus not envisaged at the federal level. The German approach is that the **basic energy needs** are **part of the minimum subsistence level** that is part of the guaranteed rights of all citizen.
- › One of the main measures for the minimum subsistence level is the housing benefit available since 2009 for the households eligible to the minimum living wage ([Wohngeld](#) / Hartz 4; about 500,000 households in 2019). The determination of the amount of the **housing allowance** includes the **expenses for heating** the dwelling. This housing benefit also includes a **flat-rate payment for electricity**.
- › In Germany (Eurostat, 2021), around 13.0 million people are considered to be **at risk of poverty**. This corresponds to **15.8% of the German population**. In 2019, around 2.0 million people in Germany lived in households that could **not keep their flat or house adequately warm** for financial reasons. This amount corresponds to **2.5 % of the population**.
- › According to Germany's [Long Term Renovation Strategy of 2020](#), **about 30% of the residential floor area** would be rated with an energy **class of G or H** (i.e. with a final energy consumption of 200 kWh/m².year or more). The rate of worst-performing dwellings is higher for single-family houses (40% for single-family houses, and 16% for apartment blocks) and especially for older houses (60% for single-family or two-family houses built before the first Thermal Insulation Ordinance of 1978).
- › One specific concern about energy poverty in Germany is related to the **high electricity prices** for households, partly due to the financing of electricity produced from renewables (EEG Law). This may explain why one of the key objectives of the German government that can be related to energy poverty alleviation is to **ensure affordable energy prices** in the process of energy transition (as highlighted in Germany's [National Energy and Climate Plan](#)).
- › Households eligible to social or unemployment benefits can get support from their social or job centre, in case they cannot afford to pay their **electricity bills**. They can apply for an **interest-free loan**, as part of the [Hartz 4 measures](#) (now citizen's income). Charity organisations and local authorities also provide advice and support for households about the aids they can get and the administrative process (see e.g. [Caritas](#) or the [city of Essen](#)).



- › In this context, **electricity disconnections** can be seen as an indicator of energy poverty. The number of disconnections carried out by network operators was 296,370 in 2018, 289,012 in 2019, 230,015 in 2020 and **234,926 in 2021** (i.e. **0.45% of the households**) ([Bundesnetzagentur](#)). The number of disconnection threats by suppliers to household customers is much higher. It was for example 4.9 million in 2018, whose around 1 million resulted in a disconnection order being issued to the relevant network operator. **Gas disconnections** have progressively decreased from 46,488 in 2014 to 30,997 in 2019, and then 23,991 in 2020 (see next point) and **26,905 in 2021**.
- › Electricity and/or gas disconnections and cuts are **strictly regulated by law** (StromGVV for electricity, GasGVV for gas) and monitored by the Ministry of Economy and Energy (BMWi) and the Federal Network Agency (Bundesnetzagentur – BnetzA). For example, a disconnection must be announced four weeks in advance and three days before the disconnection itself. The supply is only resumed when the cause of the disconnection (payment debt) has been eliminated. During the Corona period, there was an agreement and **voluntary suspension of disconnections** by many energy suppliers, which greatly reduced the number of disconnections.
- › The two major support and promotion programmes (see next pages) that can contribute to more structurally alleviate energy poverty are financed by the **Ministry of Climate Protection**.

MAIN RECENT MEASURES TO HELP HOUSEHOLDS FACE THE ENERGY CRISIS

In order to relieve the citizens from the effects of the energy crisis, numerous financial measures were taken with a series of “[Relief packages](#)”, some of which for all citizens, but also individual measures targeted at poorer households. However, these are short-term financial measures.

Measures targeted at vulnerable groups

- › **Heating cost allowance** (June 2022): one-off automatic payment to eligible households/persons at the time annual heating or ancillary cost bills are issued (summer). It benefits to an estimated 2.1 million persons in total (2.5% of the population), with amounts that were doubled between the original draft proposal in February 2022 and the final adoption in April 2022 (total funding estimated to €380 million):
 - Additional aid for the recipients of housing allowance (see above), with an amount depending on the household size (€270 for single persons, €350 for two people, then €70 for each additional person of the household) (710,000 eligible households / 1.6 million persons)
 - Special aid for trainees and students (€230 per person) (510,000 eligible persons)

In line with the comprehensive approach to alleviate poverty (see above), most of the aids to support vulnerable households in the current crisis were **not specific to energy expenses**. For example:

- › In July 2022, there was a €100 or €200 one-off payment for recipients of unemployment benefits, social assistance or basic security (amount depending on their situation). There was also an immediate supplement of €20 for children, youths and young adults affected by poverty.
- › In October 2022, the statutory minimum wage was increased to €12/hour.
- › At the beginning of 2023, the standard requirement for the citizen's allowance was increased, the

maximum income limit for mini-jobs was raised, and the child benefit was increased to € 250 per month. A reform of the housing allowance was also carried out, which increased the number of eligible households as well as the amounts they can receive.

Measures for all households

- › **Abolition of the EEG levy on electricity** (from July 2022, permanent): the EEG levy ('green electricity levy' in place since 2000) was first reduced by about 43% (from 6.5 to 3.723 cents per kWh) from January 2022, and then completely removed from July 2022. For an average electricity consumption of 3500 kWh/year, this means bill savings of €227.5/year. The energy crisis accelerated the switch from the EEG levy (i.e. electricity customers) to a combination of Federal budget and CO₂ pricing (Energy and Climate Fund) to finance the development of RES (the abolition of EEG was initially planned for 2023). This represents about €6.6 billion/year.
- › **Energy price flat rate** (September 2022): one-time energy price flat rate of 300 euros for employed, self-employed and tradespeople (payment via the employer's payslip, or prepayment of income tax reduction for the self-employed)
- › **Gas tax cut** (October 2022 – March 2024): sales tax on gas temporarily reduced from 19% to 7% to compensate for the new gas surcharge.
- › **Emergency aid for households and companies** (December 2022): households with heating from gas or district heating did not have to pay the advance or progress payment due in December 2022 (for a consumption limited to the level forecasted in September 2022). This emergency measure was adopted to bridge the period up to the price brake (see next point).
- › **"Price brake" on electricity, gas and district heating** (March 2023 – April 2024, with retroactivity for January-February 2023): a price cap is applied to 80% of the projected or historical consumption for 2023 (limit to encourage energy savings). Cap of 12 cents/kWh for gas, 9.5 cents/kWh for district heat and 40 cents/kWh for electricity. For tenants, their landlords must pass on this relief on utility bills for example with a reduction in the fixed advance payment for operating costs). The price brake will be partly funded from the levy on the extra income made by electricity producers.
- › **Hardship support for heating oil, LPG or pellets** (2023): an Economic Stabilization Fund (with €1.8 billion) was created to provide financial support to households with heating systems fuelled with oil, LPG or pellets. The Federal government and Länder need to agree on the rules to use this Fund for providing these households with heating subsidies.
- › **Extension of the waiver agreement to all households** (2023): households with the basic electricity service already have the right to conclude a waiver agreement (i.e. paying off energy bills in installments without interest, preventing energy cuts). This possibility is extended to all households during the period of price brake, for electricity and gas bills.
- › **No increase on electricity transmission fees** (2023): the Federal budget will be used to cover the increased costs of electricity transmission in 2023, so that these charges remain the same for

electricity customers (cost estimated to €12.84 billion, including for non-residential customers).

- › **Tax relief on transport fuels** (June 2022 to August 2022): energy tax on transport fuels was reduced to the minimum allowed by the European legislation. The tax relief amounted to 30 cents per litre for petrol and 14 cents per litre for diesel.
- › **Reduced monthly ticket for public transport** (June 2022 to August 2022): local and regional transport ticket for €9/month (financed by the Federal budget; €2.5 billion for the 3 months). This benefitted to the 10 million persons already having a monthly subscription, and further 52 million tickets were sold over the 3 months.
- › **Increased distance allowance for long-distance commuters** (2022-2026): allowance increased by 8.6% (from 35 to 38 cents) from the 21st kilometer, to mitigate higher costs (including CO₂ pricing) for long-distance daily trips to work. The allowance applies regardless of the means of transport.
- › **Postponement of the increase in CO₂ costs until 2024**

Other measures available to all households include additional funding for replacing their heating systems with heat pumps or RES systems. The [BAFA subsidy scheme](#) for example include a 10% heating exchange bonus when replacing oil, gas, coal and night storage heaters. A zero rate of sales tax is applied for the supply and installation of [photovoltaic systems](#). However, these schemes do not include specific provisions for low-income or energy poor households.

MAIN NATIONAL ENERGY EFFICIENCY MEASURES TACKLING ENERGY POVERTY

Caritas Electricity Saving Check
(‘Stromspar-Check Aktiv’) (2008 - on-going)

- › **Free on-site energy counselling** provided by **long-term unemployed people trained to become energy-saving advisors** for the scheme, in three steps:
 - First visit to measure and analyse energy usage
 - Second visit to provide an **energy saving plan** (tailored advice) and **low-cost devices saving energy or water** such as LEDs, water-saving shower heads or switchable power strips
 - Third visit (optional) to monitor the effects after one year
- › The participants can also benefit from a **voucher** (€100 to €200) **to replace their inefficient cold appliance** (if older than 10 years) with a high efficiency one.
- › The scheme is aimed at **households at risk of poverty**. It started in 2008 with local projects and has **expanded progressively**, with now more than 1,000 advisers in **more than 150 locations**. It now also offers energy advice by phone or online for the areas not yet covered by the on-site visits.
- › Between 2009 and March 2023, more than **412,000 low-income**



	<p>households (i.e. more than 1 million people) were advised and 720,000 t of CO₂ were saved. The savings are on average € 190/year (and 300 kgCO₂/year) per household. The savings can increase to €300/year when replacing the cold appliance (Stromspar-Check website).</p> <ul style="list-style-type: none"> › 20% of the trained energy advisors have found a job › The scheme has been developed by Caritas Germany in partnership with the Federal Association of Energy and Climate Protection Agencies, coordinated by Berlin Energy Agency and funded by the Ministry of Economics and Climate Protection (BMWK) as part of the National Climate Protection Initiative (NKI). The funding adopted for 2023-2026 amounts to €39 million. This new period will have a focus on energy savings for heating, and advice will also cover avoiding waste and food waste (BMWK, 2022).
<p>Preventing energy poverty with a systemic advisory approach (2012 – “ongoing”)</p>	<ul style="list-style-type: none"> › The counselling concept follows a multi-level systemic approach in which the problem-solving and debt relief process is accompanied by mediation and legal and technical issues are clarified. The counselling mediates in the system between EVU, those seeking advice, authorities and social institutions. Those seeking advice are advised by telephone, at the consumer advice centre or on site. › Free counselling for people with low incomes, or with normal incomes and special burdens, as well as households that can no longer pay their energy costs and are therefore usually threatened by a supply cut-off. › This access was initiated by the Consumer Advice Centre of North Rhine-Westphalia and is now offered throughout Germany. Funding is provided by the Ministry of Climate Change. › The evaluation shows that after 6 to 12 months there is an improvement in 85% of the households.
<p>Consumer Associations' Energy Savings Check (since 1978)</p>	<ul style="list-style-type: none"> › On-site energy consulting provided by the local consumer associations ('Verbraucherzentrale') that is available for free for low-income households and tenants since 2019. The fee for other households is €30. Depending on the format, the on-site energy advice (and resulting report) is worth between €77 and 538 per hour. The remaining cost is funded by the Federal Ministry of Economics and Climate Protection. › The visit is decided after a first contact by phone or online (free step for all).
<p>Social Housing Promotion Act (Wohnraumförder)</p>	<ul style="list-style-type: none"> › This law set the framework conditions for social housing in Germany, with some margins for the Länder to implement it. › One of the provisions allows additional funding to cover extra construction

ungsgesetz) (2002
– on-going)

or renovation costs **to achieve higher energy performance**, with the aim **keep net rents** (paid or charged) **affordable**.

- › The type of funding (e.g. soft loan, grant) and the criteria are set by the Länder.

The table above is focused on national EE policy measures tackling energy poverty. More initiatives exist at regional or local level. The German regions (Länder) have an important role in the implementation of energy efficiency programmes. They may implement schemes complementary to the national/Federal programmes, possibly with provisions related to energy poverty alleviation.

There are numerous other financial support mechanisms for energy savings available to households (mainly for housing renovation), but these rarely focus on vulnerable or energy poor households. The same for the labelling scheme for old heating systems ('Heizungsanlagenlabel') and optimisation scheme for heating systems ('Heizungsoptimierung'). Whereas both schemes do not include specific provisions for vulnerable households, they can contribute to alleviate energy poverty, as energy poor-households tend to have old and inefficient heating systems. About 13 million boilers older than 15 years are to be labelled over seven years (see Germany's [Long Term Renovation Strategy 2020](#)).

FOCUS ON ARTICLE 7 EED AND THE ROLE OF ENERGY COMPANIES

Germany follows the approach that energy poverty is a part of poverty and to be tackled mostly with social policy. Reciprocally, the energy efficiency strategy does not include a specific social dimension. Therefore, Germany did not report any policy measure as contributing to alleviation of energy poverty, as part of the policy measures reported to Article 7 of the EED.

Similarly, the energy companies have not been directly involved in the national energy efficiency schemes. Nevertheless, they have an important role in the implementation of the measures for vulnerable households, as regards ensuring access to affordable energy and preventing energy cuts (see above). Some local energy companies have developed offers that can bring advantages to low-income households (see the example of EnergieRevolté Düren in the [good practices of the factsheet](#) about Germany done by the French observatory on energy poverty).



INTERVIEW WITH MICHAELA HOFMANN, Diözesan-Caritasverband für das Erzbistum Köln e.V., Bereich Soziale Integration

› Do you expect an increase in the number of households at risk of energy poverty due to the current energy crisis?

Yes, definitely. Not only energy costs are rising, but also the cost of rent and food. Every day anew, people have to decide what to spend their money on. They then weigh up what to pay for first. And in general, incomes and also social benefits are not increasing in such a way that the percentage for energy to be paid out of the household income is decreasing. The situation will get worse for many households and the number of electricity and gas disconnections will increase.

› Have there been recent changes in the policy measures to tackle energy poverty?

In Germany, Energy poverty is understood as part of financial poverty. Through minimum wages, the increase of housing allowance and the expansion of those entitled to housing allowance, attempts are made in principle to avoid electricity and energy blackouts. For people receiving basic security benefits, heating costs are covered at an appropriate level and this is usually sufficient to ensure heating. Electricity costs are only paid via the standard rate and here the problem arises that the calculation is not based on the actual costs and this results in electricity debts. More targeted measures would be desirable.

› Are energy efficiency schemes an important part of the national strategy or approach to tackle energy poverty?

Energy efficiency programmes are linked to climate protection and include housing and building renovations, renewal of heating systems, etc. They are not aimed at preventing

energy poverty. The only programme that could come close is the electricity savings check, which is carried out in low-income households. However, this only includes advice on saving electricity costs and identifying electricity guzzlers. And there is the possibility of replacing refrigerators with high electricity consumption. However, only a subsidy is paid here.

› What is or should be the role of energy companies in the schemes to tackle energy poverty?

Many municipalities have had round tables on energy poverty for several years. These were set up to avoid electricity and gas cuts. In this context, they are the most important actors, because without the concession and cooperation of the energy suppliers, no agreements could have been made about instalment payments, deferrals, reduction of reminder fees, information about loan payments from the job centre, etc. The energy suppliers can also provide important information about the amount of the loan, the amount and type of energy debt, so that conclusions can be drawn about measures to help prevent energy poverty.

› Could an “energy poverty” ringfence or sub-target in Article 7 EED change the way energy poverty is tackled? (or could it make that energy efficiency measures would better include a social dimension?)

Many good measures have come about through laws or directives, so an insertion in Article 7 would certainly give an impetus to also include people's financial possibilities. However, this would then require clear specifications of what would have to be implemented or

addressed so that there is also an incentive to implement energy efficiency measures socially.

› **Would you like to add a comment on the topic of energy efficiency measures to tackle energy poverty?**

It is important to recognise that people with low incomes, in contrast to people with higher incomes, consume little energy. This should be

rewarded by replacing energy guzzlers, making kWh cheaper. And people who live in poor housing are not able to heat in an energy-saving way. Measures are needed here to ensure that people with a low-income can also live in an energy-efficient way.

INTERVIEW WITH CAROLINE OPPENRIEDER (Specialist Coordinator Electricity Saving Check, Caritasverband Frankfurt e.V.)

› **Do you expect an increase in the number of households at risk of energy poverty due to the current energy crisis?**

Yes, we assume that the number of households suffering from or threatened by energy poverty is growing. Already in the past, the standard rates provided for electricity in the unemployment benefit II were clearly too low to cover the actual costs. This was already determined by ZEW in 2015 in a study in cooperation with Stromspar-Check. According to a recent study by the Institut der deutschen Wirtschaft, 25% of Germans spent more than 10% of their net income on energy in May 2022. This includes expenditure on heating, hot water and electricity. By comparison: in 2021 it was only 14.5%. So the burden of energy costs is growing, and naturally it is hitting low-income households the hardest, who already had to spend a significantly larger share of their income on energy before the price increase.

› **Have there been recent changes in the policy measures to tackle energy poverty?**

In my view, the fundamental position on the issue of energy poverty has not changed. Various short-term measures have been initiated by the federal government. However, only a few of these measures were specifically

designed for low-income households. A large part of the assistance was available to all households. An analysis within the framework of the Ariadne project shows that a large share of emergency gas assistance (between 56 and 66%, depending on the threshold chosen) goes to presumed non-needy households.

› **Are energy efficiency schemes an important part of the national strategy or approach to tackle energy poverty?**

Energy efficiency measures do of course play a role in the policy mix, e.g. in the building sector, but so far more under climate protection aspects. Unfortunately, the response to the energy crisis has so far focused mainly on financial cushioning and not enough on incentives to save energy. The financial cushioning was necessary, but we now urgently need measures that promote energy savings on a large scale and, above all, consider the restrictions of low-income households.

› **What is or should be the role of energy companies in the schemes to tackle energy poverty?**

In the summer of 2020, due to the Corona pandemic and the associated burdens, there was a moratorium from April 1st 2020 to June 30th 2020, during which consumers who had

suffered economic disadvantages as a result of the Corona pandemic could temporarily suspend payments of electricity and gas bills on the basis of a legally standardised right to deferral. In addition, around 72% of the electricity suppliers surveyed in the monitoring report stated that they had voluntarily refrained from blocking their customers. The position of Caritas and thus of the Electricity Saving Check is that electricity and gas disconnections in private households should be prohibited, as the supply of energy is existential, an interruption makes an orderly life impossible and further exacerbates hardship. Fees that are currently still charged for disconnection and reconnection must be waived for recipients of transfer payments. Because energy poverty is often a combination of precarious living conditions, low income, poor education, socio-cultural habits and other factors, some of which are very individual. There is also a need for comprehensive, individual counselling that helps to reduce consumption.

› **Could an “energy poverty” ringfence or sub-target in Article 7 EED change the way energy poverty is tackled? (or could it make that energy efficiency measures would better include a social dimension?)**

The inclusion of appropriate criteria would certainly lead to the issue becoming more visible, even independently of acute crises. This is desirable. Low-income earners more often live in dwellings with a poor energy condition (old buildings, poorly insulated, old heating systems with night storage heaters and oil heating) with a corresponding high energy demand. Ideally, social criteria in the Energy Efficiency Directive should, for example, lead to such low performance buildings being refurbished as a matter of priority, whereby care should be taken that energy refurbishments do not lead to strong rent increases and thus to displacement.

› **Would you like to add a comment on the topic of energy efficiency measures to tackle energy poverty?**

Energy poverty and socially just climate protection must be considered together. Consistency, efficiency and subsistence are necessary for both. There is a strong correlation between energy consumption and income; accordingly, we must also work towards ensuring that higher-income households drastically reduce their consumption. Lower-income households are not the cause of the climate crisis, but the ones who suffer most from its effects.

INTERVIEW WITH ANTJE KAHLHEBER, project leader of ‘Energy cost advice for low-income households’ of Rhineland-Palatinate’s Consumer Association

› **Do you expect an increase in the number of households at risk of energy poverty due to the current energy crisis?**

Yes, we are observing a significant increase in enquiries in our advisory services.

As early as 2021, around 5 million households in Germany were threatened with disconnection of electricity or gas supply (BNetzA monitoring report 2023). This corresponds to around 12

percent of households. If one takes into account that less than half of the households use gas for heating and that households that have already been disconnected are not included in this figure, the number of unreported cases is probably even higher. Due to the energy price crisis, we expect 15-20 percent of households to have problems paying their energy bills (heat and electricity) in the course of the year.



› **Have there been recent changes in the policy measures to tackle energy poverty?**

The German government has taken a variety of measures to cushion the burden of increased energy prices. Some of these are quite unspecific and also benefit high-income households. Measures that are specifically effective for low-income households include flat-rate energy allowances for pensioners, students and recipients of social benefits, an increase in child benefit and child supplement, heating allowances for recipients of housing benefit and BAföG, and the reform of housing benefit (see here: https://foes.de/publikationen/2022/2022-11_FOES_Energiepreiskrise.pdf).

In practice, the current changes in energy law are of great importance, among other things, to avoid blocking by means of an avoidance agreement, a three-month payment moratorium as well as relief under social law for one-time applications for social benefits - for example, for the month of a heating cost arrears payment or fuel delivery.

The overall effect of the measures will only become apparent over time, especially since there is currently an implementation backlog at several levels: Not all suppliers are able to implement the price brakes on time; the social welfare authorities lack the personnel capacities to process applications quickly and some customer centres can no longer be reached to negotiate the instalment amount in an avoidance agreement.

In addition, classically vulnerable households include many people who are uninformed or limited in their ability to act - due to language barriers, illness, overwork or lack of education. It is possible that these households are not reached in time by all measures because they are not able to use their possibilities. For such

vulnerable households, a possibility - yet to be established in Germany - of socially graduated direct payment of relief would be easier..

› **Are energy efficiency schemes an important part of the national strategy or approach to tackle energy poverty?**

With regard to heating energy, the energy efficiency programmes in Germany do not specifically address low-income households. For them, energy modernisation measures are usually not affordable, even with government subsidies. In addition, most low-income households rent and have little influence on the energy condition of their house.

In contrast, free advice on energy saving is supported or financed by the state, e.g. by the consumer centres with a nationwide network of advisors, as well as by the Caritas electricity saving check, which specifically addresses recipients of social benefits and also has the possibility of promoting low-investment measures through savings articles

› **What is or should be the role of energy companies in the schemes to tackle energy poverty?**

Currently, the legislator has imposed many additional obligations on suppliers, which have strengthened the position of consumers. Now the implementation of these obligations must be ensured. Suppliers should design their receivables management in such a way that consumers are still able to settle arrears through instalment plans, i.e. warn early, block late. Often, arrears have already accumulated to such an extent that disconnections can no longer be averted. We experience time and again that utilities cannot be reached or do not react promptly, even when we have worked out solutions for the debts. In the case of disconnections, short-term accessibility must be guaranteed.

For many households, free monthly statements

would be a great help in controlling their consumption.

In connection with the planned rollout of smart meters, it was unfortunately neglected to equip them with a low-threshold benefit for customers. For example, a display showing the monthly electricity costs. Only a few people know how to extrapolate their annual consumption and estimate whether the monthly payment is sufficient or whether an additional payment is imminent. A direct feedback of consumption and costs would probably have a positive effect on consumption behaviour.

We also see a need for action at the level of the national control authorities. The Federal Network Agency must monitor market access more closely, and the abuse supervision by the Federal Cartel Office, which according to the current amendment is to control excessive prices, must be carried out promptly. The ranges of electricity and gas prices are currently extreme and cannot always be explained by different procurement strategies of the suppliers. Electricity and gas prices that are above certain limits should therefore be reviewed immediately.

We do not see energy saving and energy efficiency measures as a core task of the utility industry but as a task of economically independent institutions. Utilities should focus on low-cost supply, transparency of consumption and costs, and quick help with debt settlement to prevent energy poverty.

› **Could an “energy poverty” ringfence or sub-target in Article 7 EED change the way energy poverty is tackled? (or could it make that energy efficiency measures would better include a social dimension?)**

Improving the energy quality of apartment buildings is essential for combating energy poverty in the area of heating energy. Therefore, the implementation of minimum energy standards, as provided for in the EU Buildings Directive, seems to be expedient. Unfortunately, the current decision has moved far away from the obligation to renovate existing buildings as originally envisaged, the timetable has been extended and numerous exceptions have become possible, even in the area of social housing.

This does not help energy-poor households and counteracts the goals formulated in the EED to combat energy poverty through efficiency measures.

As a way for landlords to make investment in energy-efficient buildings and heating systems attractive, the introduction of warm rent models is being discussed (e.g. Agora Energiewende, A Building Consensus for Climate Neutrality). If rent and heating costs are paid together, the incentive for landlords to keep heating costs low should increase. This would require changes in the EED, which prescribes consumption-based billing. However, whether this model achieves the desired effects and how a savings incentive for tenants can be maintained would have to be examined more closely and tested in practice.