

Kabinet predsednika vlade
dr. Robert Golob
Gregorčičeva ulica 20-25
1000 Ljubljana

in

Ministrstvo za infrastrukturo
mag. Bojan Kumer
Langusova ulica 4
1000 Ljubljana

Ljubljana, 17.6.2022

ZADEVA: Predlogi ukrepov glede energetske druginje

Spoštovani,

soočeni z napovedmi nadaljnje rasti cen energentov in energije organizacije Focus, društvo za sonaraven razvoj, Zveza potrošnikov Slovenije, Zveza prijateljev mladine Ljubljana Moste-Polje, Greenpeace Slovenija in Plan B za Slovenijo – mreža nevladnih organizacij za trajnostni razvoj predstavljamo ključna načela in nekaj predlogov in področij, ki bi jih bilo potrebno nasloviti ob večanju energetske druginje.

Pri pripravi in izvedbi kratkoročnih ukrepov za zmanjšanje energetske druginje je potrebno postaviti in slediti splošnim izhodiščnim načelom za ukrepe, ki povezujejo reševanje druginje s socialno in podnebno problematiko:

- ukrepi morajo biti socialno pravični in ciljno usmerjeni - prednostno morajo zaščititi najranljivejše skupine prebivalstva (preprečevanje (energetske) revščine in dodatnih socialnih stisk);
- ukrepi, ki vodijo do zmanjševanja rabe energije, še posebej pa rabe fosilnih goriv, morajo biti ustrezno prioritizirani;
- vsak subvencijski ukrep, ki zagotavlja cenovno dostopnost (fosilnih) goriv in električne energije kot odziv na krizo, mora biti časovno omejen in transparenten;
- ukrepi ne smejo voditi do finančnega okoriščenja fosilne industrije in energetske intenzivne industrije na plečih državljanov in javnega denarja;
- vsak predlog finančne pomoči gospodarstvu mora biti časovno omejen in zvezan z izvedbo ukrepov URE oz. zniževanjem emisij TGP za tiste, ki bi bili te pomoči deležni. Obenem naj se onemogoči prejemanje dvojne pomoči, kar pomeni, da ob novih subvencijah ali drugi vrsti pomoči prejemnik te pomoči obenem ne more prejemati okolju škodljivih subvencij;

- kratkoročne ukrepe morajo pospremiti dolgoročnejši strukturni ukrepi v podporo pospešeni energetske tranziciji iz fosilnih virov energije na sistem temelječ na učinkoviti rabi energije (URE) in obnovljivih virov energije (OVE), ki dolgoročno krepi tudi družbeno odpornost na cenovne šoke.

V splošnem so ukrepi, ki se osredotočajo na končne porabnike in ki se pojavljajo v državah EU, sestavljeni iz:

- znižanja DDV in davkov,
- popustov pri računih, odlogov plačil, obročnega plačevanja, moratorijev na odklop zaradi neplačevanja,
- omejevanja in regulacije cen, cenovnih kopic in zamrzovanja cen,
- različnih oblik bonusov ali sredstev za ranljiva gospodinjstva, razširitve socialnih podpornih shem,
- in povračil ter odbitkov prihodkov za podjetja.

Nabor predlogov in področij, ki bi jih bilo potrebno nasloviti ob večanju energetske draginje

1. Nujna oskrba z električno energijo

Do nujne oskrbe je na podlagi Energetskega zakona in Sistemskih obratovalnih navodil za distribucijski sistem električne energije upravičen ranljiv odjemalec, ki dokaže, da bi bilo glede na okoliščine (letni čas, temperaturne razmere, kraj prebivanja, zdravstveno stanje in druge podobne okoliščine) ob odklopu ogroženo življenje, kakor tudi zdravje odjemalca in oseb, ki z njim prebivajo. Pri tem je potrebno mnenje zdravnika, da odjemalec ali oseba, ki z njim prebiva, uporablja medicinske naprave, ki za svoje delovanje nujno potrebujejo električno energijo in bi bilo ob odklopu ogroženo življenje in zdravje odjemalca in oseb, ki z njim prebivajo. Na zdravniškem potrdilu morajo biti jasno navedene medicinske naprave, ki so nujne za življenje, katere uporablja odjemalec ali oseba, ki z njim prebiva ter tehnične značilnosti aparata, z navedbo nazivne moči posameznega aparata. Če je odjemalec prejemnik denarne socialne pomoči, do dobave električne energije iz naslova nujne oskrbe ni upravičen, saj naj bi bila socialna pomoč oblika pomoči, ki je namenjena pokrivanju nujnih življenjskih stroškov, kamor spada tudi plačilo računov za električno energijo.

Nujno oskrbo torej imamo, vendar pa obsega premajhen krog upravičencev. Dejstvo je, da brez oskrbe z električno energijo posameznik ali družina težko preživi, v vsakem primeru pa bi bilo potrebno poskrbeti, da brez elektrike ne bi ostale vsaj družine z mladoletnimi otroki in starejše osebe. Pri tem bi bilo ogroženost zdravja potrebno razlagati širše, saj mrzli prostori (in s tem povezana tudi vlaga, plesen), nezmožnost, priprave toplega obroka, hladna voda itd. nesporno ogrožajo zdravje kateregakoli posameznika. Upoštevati je potrebno tudi, da denarna socialna pomoč, ki znaša bistveno manj od praga tveganja revščine, sploh glede na trenutno zvišanje nujnih življenjskih stroškov, ne more zadoščati za plačilo le-teh. Zato bi kazalo spremeniti ureditev nujne oskrbe in odklopa. Predlagamo prepoved odklopa iz energetskega omrežja ali daljinskega sistema ogrevanja za ranljiva gospodinjstva ne glede na izpolnjevanje obstoječih pogojev za nujno oskrbo. Prepoved odklopa naj velja ne glede na letni čas; številne evropske države poznajo prepoved odklopa

v času kurilne sezone, vendar pa je potrebno opozoriti, da je dostop do električne energije nujen tudi v času poletnih vročinskih valov, ko je včasih nujno hlajenje.

2. Sodelovanje ponudnikov električne energije/plina s Centri za socialno delo

Posamezniki in družine, ki se znajdejo v nenadni stiski, in niso zmožni plačati rednih mesečnih obveznosti, se tega sramujejo. Ne upajo ali ne zmorejo se obrniti na upnika, da bi se dogovorili za obročno plačilo, ali na center za socialno delo, da bi pridobili redno ali izredno denarno socialno pomoč. Ko je neplačanih obveznosti že preveč, pa se dolgovi kopičijo in družina pade v spiralo dolgov, iz katere se težko reši. Glede na navedeno predlagamo mehanizem, skladno s katerim bi ponudniki električne energije/zemeljskega plina ob dveh zaporednih neplačanih računih o tem obvestili center za socialno delo. Le-ta bi potem družini sam ali v sodelovanju s humanitarnimi organizacijami pomagal s finančnim načrtom, izredno denarno socialno pomočjo ipd.

3. Energetski kuponi

Po naših izkušnjah so bili energetski kuponi v osnovi dober ukrep. Smiselno bi ga bilo ponoviti, vendar z določenimi spremembami. Krog upravičencev bi bilo potrebno prilagoditi, saj so kupon na primer dobile družine s štirimi otroki z visokimi prihodki, hkrati pa je iz pomoči izpadel posameznik, ki mu do upokojitve manjka eno leto delovne dobe in je prijavljen na ZRSZ in prejema nadomestilo v višini cca. 415,00 EUR. Energetski kupon je bil izvzet iz sodne izvršbe, davčne izvršbe in iz stečajne mase pri osebnem stečaju. Problem se je lahko pojavil pri osebah, ki nimajo poravnane limita ali ki imajo neplačane obroke kredita - tem banka običajno za kritje limita/kredita pobere vse, kar pride na TRR, torej tudi energetski kupon. Nadalje se je energetski kupon kot dohodek upošteval pri uveljavljanju pravice do izredne denarne socialne pomoči. To je lahko težava, ker so bili stroški lahko veliko višji od zneska kupona, pa je CSD na primer zavrnil izredno denarno socialno pomoč za plačilo elektrike z obrazložitvijo, da so za plačilo tega že prejeli energetski kupon.

4. Izredna denarna socialna pomoč

Centri za socialno delo pri ugotavljanju upravičenosti do izredne denarne socialne pomoči sami odločajo, kdaj je posameznik ali družina materialno ogrožen in posledično upravičen do izredne denarne socialne pomoči. Posamezni centri za socialno delo imajo tako precej različne kriterije. Pri nekaterih centrih za socialno delo na primer ni mogoče dobiti izredne denarne socialne pomoči, če je odrasla oseba zaposlena ali ima motorno vozilo. Menimo, da bi bilo potrebno v zvezi z energetsko draginjo s strani MDDSZ centrom za socialno delo poslati neka splošna navodila, v katerih okoliščinah bi posameznik ali družina morala biti upravičena do izredne denarne socialne pomoči.

5. Širitev kroga upravičencev

Ukrepi, ki bi olajšali plačevanje stroškov za energente vsem tistim, ki zaradi enormnega povišanja cen ogrevanja stroškov ne zmorejo plačati, bi morali poleg upravičencev do socialne pomoči in varstvenega dodatka zaobjeti tudi tiste, ki minimalno presegajo cenzus za prejem socialne podpore, tako aktivna gospodinjstva kot upokojenca.

6. Cenovni ukrepi

K blažitvi posledic bi bilo nujno prispevati tudi z znižanjem davka na dodano vrednost. Primerljive rešitve za zmanjšanje zneskov na računih bi bilo treba uvesti tudi pri zemeljskem plinu in daljinski toploti.

7. Večja usmeritev na obnovljive vire energije in povečanje energetske učinkovitosti za gospodinjstva

Predlagamo oblikovanje ambicioznejše finančne podporne sheme pri Eko sklada, ki bo bolj dostopna gospodinjstvom s povprečnimi ali nizkimi dohodki. Z vlaganjem v OVE in URE si bodo gospodinjstva posledično lahko zniževala stroške računov. V zvezi s tem bi predlagali tudi razmislek v smeri možnosti vnaprejšnjega plačila vsaj dela stroškov preko Eko sklada, zaradi česar se bodo gospodinjstva lažje odločila za prehod na obnovljive vire energije, za energetske učinkovite naprave in energetske učinkovite domove.

Preučitev možnosti:

- oprostitev/delno plačilo NUSZ za energetske prenove hiš/stanovanj,
- oprostitev/delno plačilo DDV za investicije gospodinjstev v URE, vključno z montažo,
- dohodninske olajšave pri odločitvi za OVE in URE naprave.

Menimo, da bi bilo treba pospešiti tudi investicije v energetske učinkovitost večstanovanjskih stavb ter zagotoviti večjo dostopnost do OVE in URE vsaj za najemnike stanovanjskih skladov. Smiselno bi bilo oblikovati pravila za delitev spodbud med lastnike in njihove najemnike, s čimer bi se spodbudilo vlaganje v OVE in URE.

V zvezi s tem bi bilo treba zagotoviti učinkovitejše informiranje potrošnikov, še posebej tistih, ki nimajo možnosti ali znanja dostopati do informacij preko spleta.

8. Zamenjava staro-za-novo za neučinkovite gospodinjske aparate

Obstoječim programom Eko sklada bi kazalo dodati program zamenjave neučinkovitih gospodinjskih naprav z novimi (staro-za-novo), predvsem za večje porabnike energije, kot so hladilniki ali zamrzovalniki.

9. Zagotovljen dostop do osnovnih energetske storitev

Sicer ne gre za ukrep hitrega naslavljanja energetske druginje, vendar pa bi kazalo na dolgi rok razmisliti o tem, da se vzpostavi zakonska pravica državljanov do pokrivanja osnovnih energetske storitev in potreb, kot je ustrezno toplo in razsvetljeno stanovanje ter zagotavljanje delovanja osnovne električne in elektronske opreme. Pravno zavezujoča pravica do osnovnih energetske storitev bi lahko zagotovila pravno zaščito in opolnomočila ranljive skupine ljudi. Elementi pravice do osnovnih energetske storitev so dostop do čiste energije, poštene cene energije, prepoved odklopa, skupnostno lastništvo, kakovostni in učinkoviti domovi in univerzalni dostop do osnovnih storitev.

10. Vključevanje ranljivih gospodinjstev v energetske skupnosti in skupnosti OVE

Prav tako gre za ukrep, ki ne prinese hitrega odgovora na energetske draginje, vendar pa na daljši rok lahko predstavlja enega od načinov za vključujočo energetske tranzicije: ranljivim gospodinjstvom je potrebno omogočiti, da postanejo člani energetskih skupnosti ter jih pri tem spodbujati, bodisi s finančnimi podporami bodisi s spodbujanjem vključevanja preko drugih mehanizmov.

S spoštovanjem!

Focus, društvo za sonaraven razvoj

Zveza potrošnikov Slovenije

Zveza prijateljev mladine Ljubljana Moste-Polje

Greenpeace Slovenija

Plan B za Slovenijo – mreža nevladnih organizacij za trajnostni razvoj



v sklopu projekta¹



v sklopu projekta



GREENPEACE



1 Projekt EmpowerMed je financiran v okviru programa Evropske unije za raziskovanje in inovacije Obzorje 2020 v skladu s pogodbo št. 847052. za vsebino tega dokumenta so odgovorni izključno avtorji. Vsebina ne odraža nujno mnenja Evropske unije. Niti agencija EASME niti Evropska unija nista odgovorni za kakršno koli uporabo informacij, ki jih vsebuje dokument.



PRILOGA:

LIST OF NATIONAL POLICIES TO SHIELD CONSUMERS FROM RISING ENERGY PRICES IN EU COUNTRIES

To the extent possible, short-term measures should be well-targeted to meet the needs of the poorest and most vulnerable. Properly targeted transfers are more effective (and often lower cost) instruments for reaching the most vulnerable households, rather than broad-based price subsidies.

FRANCE

- freezing both gas and electricity tariffs: A tariff shield has been put in place for gas prices, with regulated tariffs being frozen at their October 2021 level for the duration of the winter (and further extended until the end of 2022). The State will cover the additional costs incurred by suppliers as a result of this freeze.
- introducing energy and inflation vouchers for lower income households (an exceptional €100 energy voucher was distributed in December 2021, helping the 5.8 million households – who had already received an energy cheque for an average amount of €150 back in April 2021; an inflation allowance of €100 will be granted to the 38 million people with a net monthly income below €2,000)
- reduction of the tax on electricity tariffs, from 22.50 €/MWh to 1 €/MWh for households and to 0.50 €/MWh for companies
- securing and extension of the electricity tariff shield has blocked the increase of regulated electricity sales tariffs to 4% (including tax)
- extending the tariff shield by limiting the increase in regulated electricity sales tariffs to 4% for small professional consumers in metropolitan France, as well as for all professional consumers in the overseas territories and Corsica (non-interconnected areas) who benefit from these tariffs.
- an exceptional increase by 20 TWh of the volume of ARENH to be delivered in 2022, i.e., EDF selling some additional 20 TWh to alternative suppliers, EDF would sell at 46.2 €/MWh and buy the same volumes at... 256.98 €/MWh! Suppliers should pass the full benefit on to consumers. This point will be closely monitored in conjunction with the Energy Regulation Commission, so that all consumers can benefit from the competitiveness of the French nuclear power fleet.

GERMANY

- Complete elimination of the EEG-Umlage (renewable energy levy): in the second half of 2021, the government reduced this surcharge from €6.5cts/kWh to €3.7cts/kWh starting 1 January 2022; now the government completely abolished this levy. The fixed remuneration for renewable power installations will be paid directly from the state's budget using income from the sale of carbon allowances.
- One-off heating cost allowance: consumers who receive housing benefits or student/trainee support will receive between €115 and €175, to be paid out in summer when many households will face bills reflecting the higher prices

- “Climate payment”: In the longer term, a so-called “climate payment” to all households is envisaged to compensate citizens for rising energy costs due to higher emissions allowances pricing.
- Social housing subsidies: Social housing subsidies have also been increased to account for a higher emissions allowances price on heating fuels as of 2022.
- Measures to help save energy, such as reducing car emissions or replacing gas heating systems.
- market-based incentives should be used to ensure that those who use less energy also have lower costs.
- Mobility: Introduce a state fuel subsidy for car drivers. The amount of the subsidy would be deducted from a driver’s bill when paying at the petrol station (the operator of the petrol station would then have to submit the receipts to the tax authorities in order to claim the money back). Alternatively, set-up a monthly payment to lower-income households, and the amount of the subsidy would depend on the income. However, it remains unclear how the money can be distributed, because the country lacks a system via which all residents could be paid.
- “Energy bonus”: To pay back revenues of the national carbon price on transport and heating fuels to citizens. However, this proposal is faced with the same obstacle described above.

SPAIN

- VAT reduction: In June 2021, the VAT rate was reduced from 21% to 10% for small customers and the generation tax (7%) was temporarily suspended. A few months later, the electricity tax was reduced from 5.11% to 0.5%. These measures were meant to last for a few months but, as the energy crisis worsened, they were extended.
- CO2 clawback: government passed a bill setting up a CO2 clawback to non-CO2 emitting generation installed before 2003 (mainly for hydro and nuclear power producers, as well as for unregulated renewables); later also a temporary deduction of market revenues for non-CO2 emitting power plants was introduced in order to reduce customers’ bills. The amount is calculated in proportion to the excess of natural gas prices over a base gas price set at 20 €/MWh.
- Increase of the social bonus to vulnerable consumers from the current 25% to 60% and from 40% to 70% in the case of severely vulnerable people. Moreover, the budget for the thermal social bonus is doubled in 2021, rising to €202.5 million.
- future implementation of a new type of long-term power purchase auctions which will be held alongside the wholesale market auctions. Also, the introduction of a cap on gas prices for the regulated tariff of natural gas, known as the “last resort tariff” (TUR) for small customers.

ITALY

- Initially, Italy had looked to mitigate the final price of gas and electricity for industrial customers and households.
- In October 2021, the Italian government announced a first relief package for gas and power price reduction, for industrial consumers and households, reducing levies equivalent to €3.5 billion for Q4 2021. The measures were later extended to Q1 2022 for a total amount of €6 billion.

- additional temporary measures to combat the impact of high energy prices, including a contentious article introducing a windfall tax on renewable generation. With these measures, the total aid amounted to more than €10.5 billion.
- reduced system costs for large users with more than 16.5 kW contracted by removing the system cost element from their bills. The expected €1.2 billion aid would be met largely by diverting income from CO2 auctions.
- tax credit for companies that have seen their energy costs increase by more than 30% compared to 2019
- an effective “clawback” on renewable income from February 1 to December 31, 2022. This measure impacts PV plants that have fixed tariffs under the Conto Energia scheme, as well as hydro, geothermal and wind installations that are not part of the contracts for difference schemes. The reimbursement would be based on a differential of the plant’s income over its average hourly price from the date it was put into service, with a starting limit of January 2010 and up to December 31, 2020, adjusted to inflation. Supply contracts agreed before approval, which are not linked to the spot price, would generally be exempted, according to the Decree.
- Fuel prices’ reduction of 25 cents until the end of April
- The increase of the beneficiaries of the social bonuses (increasing the number of eligible families eligible from 1.2m to 5.2m)
- The possibility for consumers to pay their energy bills in instalments for up to two years
- The increase of tax credits for energy-intensive electricity and gas companies
- Simplification of the procedure for the installation of new renewables energies.

THE NETHERLANDS

- reduced the energy tax for households and companies in 2022 at an estimated cost of €2,7 billion and €0,5 billion, respectively; this tax reduction, partially financed by gas sales paid at the price of gold, will start on 1 April, with excise duties being reduced by 21% on diesel and petrol, and 4.1% on LPG and LNG. Moreover, on 1 July 2022, the VAT on energy (power, natural gas and district heating) should be lowered from 21% to 9%.
- spend €150 million on measures to improve insulation of the poorest households with high energy bills and/or poorly insulated houses. This envelope was finally increased to €300 million.
- an exceptional energy allowance of €800 – from €200 previously – is being put in place for these households.

UNITED KINGDOM

- a £500 million fund to help the poorest households pay their energy bills. This fund adds to the Warm Home Discount scheme –people on low income will benefit from a £140 discount on their electricity bills for winter period 2021-2022 – and to the Winter Fuel Payment – a grant in the range of £100 and £300 to help end-customers (born on or before 26 September 1955) pay their heating bills.
- £350 would be granted to the vast majority of households to help them pay rising energy bills. This will cover just over half of the £693 increase in the maximum energy cost price for households after 1 April 2022.

- Ofgem, the country's energy regulator, allocates customers of energy companies which have faced bankruptcy – due to rising wholesale gas prices – to new suppliers. The government is considering giving loans to those energy companies that take over these customers.
- Moreover, Ofgem has raised the cap on the most commonly used tariffs by 12-13% from October, following a previous rise in April, due to high wholesale costs. There are fears that Ofgem could implement a further rise in April 2022, taking the price cap to £1,995, following a series of energy company bankruptcies in the country.
- The government is also bailing out major CO2 emitting manufacturers to avoid disruptions in the food supply chain and is also considering intervening in the domestic carbon market in December should prices remain high.

BELGIUM

- reduce VAT on gas and electricity to limit the impact of rising energy prices; electricity from 21% to 6% from March to July
- households with gas or oil heating will also receive a cheque of €200 euros.
- excise duty on diesel and petrol will be reduced by 17.5 cents per litre, promising Belgians a saving of €10 on a 60l tank.
- extended the social energy tariff, introduced during the pandemic, until the end of March 2022, at a cost of €208 million
- energy voucher of €80 euros for the poorest households
- from 12 October, a €16 million Gas and Electricity Fund was to be set up to help households that cannot benefit from social tariffs.
- the replacement of taxes such as green energy certificates with special taxes which the government can easily adjust to compensate energy price variations,
- the prohibition of unilateral changes in energy contracts to prevent energy suppliers from increasing consumers' bills.

More details per country: <https://www.bruegel.org/publications/datasets/national-policies-to-protect-consumers-from-rising-energy-prices/>