
METHODOLOGY FOR MITIGATING ENERGY POVERTY IN BULGARIA AND THE EUROPEAN UNION

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Abstract: In the mid-2000s, an increasing number of articles began to address the need for developing modern energy services in developing countries. These publications, in addition to analyzing the lack of physical access to energy services and its consequences, also discussed the financial inaccessibility of these services. Researchers assessed various types of energy resources consumed by households across income deciles to highlight income-based disparities. The World Bank raised the issue of financial inaccessibility to energy on an international level, emphasizing its negative effects on people's health, children's education, women's quality of life, and the environment. Energy accessibility was examined within tools aimed at addressing poverty issues, especially among marginalized groups, rural areas, and other underserved communities.

Key words: methodology, energy, poverty.

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Introduction

Like other EU Member States, Bulgaria prepared an Integrated National Energy and Climate Plan (INECP) in 2019 to outline its climate mitigation goals and policies through 2030. The main strategies in terms of energy supply include reducing the use of coal as an energy source, expanding nuclear capacity, increasing investment and the use of renewable

energy sources (RES) (solar, geothermal energy and biofuels) as well as increasing the use of natural gas. On the demand side, the strategy focuses on improving the energy efficiency of buildings and promoting low- or zero-carbon transportation modes (public transport, electric vehicles). Key targets for 2030 include no net increase in greenhouse gas (GHG) emissions in non-Emission Trading Systems (non-ETS) sectors compared to 2005, in line with the EU's Effort Share Regulation on mandatory annual reductions in GHG emissions, a national target of 27.1% for the share of renewable energy in gross final energy consumption, and specific energy efficiency targets.

The strategy discusses the existing and planned sectoral policies and programmes of the authorities to facilitate progress towards the targets (such as the existing programme to support the renovation of energy efficiency buildings funded by a regular EU programme). The INECP presents forecasts for greenhouse gas emissions through 2030 based on two different assumptions. One forecast is based on existing policies and measures, including those at EU level, while the other reflects additional planned policies and measures. EU Member States, including Bulgaria, are required to periodically update and report on these forecasts. However, none of the forecasts in the latest submission reflect more recent developments, including measures in Bulgaria's Recovery and Resilience Plan (RRP), updated nuclear facility plans and the latest policy developments at EU level, including Fit for 55 and REPowerEU. Bulgaria's RRP aims to accelerate the use of RES and hydrogen, improve energy efficiency and promote sustainable mobility. To this end, a large part of the resources of the Resilience and Recovery Fund (RRF) is allocated to investments in the green transition. The main measures and investments include: reduction of greenhouse gases from the energy sector, installation of electric storage facilities, increase in the production and use of renewable energy sources, study of the use of geothermal energy, improvement of energy efficiency in the transport sector, repairs to improve the energy efficiency of residential and non-residential buildings, promotion of green hydrogen technology, liberalization of the electricity market, reducing administrative burdens and simplifying procedures, smart grid improvements and upgrades, transitional activities to support asset reuse and training (Jeliazkova, Krasteva, & Minev, 2021). Bulgaria has access to various funding sources to support the substantial investment needs required to implement its decarbonisation plan. The INECP estimates investment needs at €42.7 billion for the period 2021-2030, which is approximately half of Bulgaria's GDP for 2021. Nearly three-quarters of this amount is allocated for improving the energy efficiency of residential buildings (€11.8 billion), building additional nuclear capacity (€10 billion), and transportation (€9 billion). Investments in the green transition outlined in the RRP (EUR 3.7 billion) will cover part of these needs. The policy measures envisaged in the

INECP qualify for external funding from multiple sources, including the EU Multiannual Funding Framework for 2021-2027, Invest EU, the Modernisation Fund, EEA grants and EIB funding, as well as the EU Resilience and Recovery Mechanism, which supports the RRP.

Results of policies and measures to reduce energy poverty for vulnerable consumer groups

The present study aims to analyze the policies and measures of the European Union (EU) addressing energy poverty and protecting vulnerable consumers. In the context of increasing dependence on energy resources and pressure on low-income households, the issue of energy poverty is becoming increasingly significant, affecting millions of citizens across the EU. The main research objective is to assess both existing regulations and their implementation at national level to propose improvements in future policies that are more effective and sustainable. The study focuses on developing better mechanisms to protect vulnerable consumers and proposes alternative approaches for a more sustainable reduction of energy poverty in the EU.

The primary European legislation that includes provisions for addressing energy poverty is the Third Energy Package, which pertains the common rules for the internal markets of electricity and gas, as outlined in Directives 2009/72/EC and 2009/73/EC (European Parliament, 2009). These directives state that energy poverty is a significant issue and that member states must take action. To this end, there is a specific requirement for member states to adopt definitions of vulnerable consumers and protective measures (Article 3(8) of Directive 2009/72/EC). The methodology of the study includes an in-depth analysis of European legislation, primarily focusing on the Third Energy Package, as well as an examination of existing directives and regulations related to vulnerable consumers. A comparative analysis of the national policies of the member states has been conducted, highlighting the different approaches to addressing energy poverty and protecting their citizens. The study also includes an assessment of best practices in several countries where social tariffs, subsidies and other forms of financial support have proven effective, at least in the short term. At the same time, it considers long-term solutions, such as improving energy efficiency and investing in housing infrastructure, which are essential for a lasting solution to the problem.

The study also examines key initiatives of the European Commission, such as the Vulnerable Consumers Working Group (VCWG), established within the framework of the Citizens' Energy Forum. This group plays a central role in understanding the challenges of implementing European legislation and providing protection for vulnerable consumers. The Group also contributes to defining “energy poverty”, which varies across member states. The European

Commission, through its studies and research initiatives, such as the INSIGHT_E report, also enhances understanding of this phenomenon and identifies actions necessary to address it at the European level.

The main findings of the study indicate that while the EU provides the framework for tackling energy poverty, member states adopt different approaches depending on their specific economic and social conditions. In some countries, such as France and Belgium, social tariffs are implemented to alleviate the burden on vulnerable households. In Belgium, for example, all energy suppliers are required to offer these tariffs to specific categories of consumers, including the elderly and people with disabilities. However, these measures are often regarded as short-term solutions that inadequately address the underlying causes of energy poverty. Within the framework of the Citizens' Energy Forum, this group was established by the European Commission to help ensure the effective implementation of the Third Energy Package for consumers. Its goals include promoting a better understanding of vulnerability in energy markets, defining it and sharing good practices in protecting vulnerable consumers. Such activities support the Commission as it shapes its policy position in this area, and the member states in implementing the provisions of the directives.

The development of a broader strategy is gaining momentum in the European Commission. This is reflected in the integration of the concept of energy poverty into policy documents, such as the Energy Union, and the increase in research activities. Following the publication of studies on this issue, including the report INSIGHT_E (Pye, Dobbins, Barta, & Brajković, 2015), the Commission is continuing further research to enhance the understanding of energy poverty across Europe by developing indicators and evaluating potential actions. This effort is part of a project entitled Fuel/energy Poverty – Assessing the Impact of the Crisis and Reviewing Existing and Potential New Measures in the Member States (VCWG, 2013).

It is evident, based on the formulated research agenda and discussions in forums such as the VCWG, that there is genuine interest on from the Commission in exploring additional legislative or other types of measures that can be implemented, the extent to which the definitions should be consistent to enable harmonised protection and how the monitoring of the problem can be improved.

The study highlights the existing tension between short-term financial interventions and the need for long-term structural reforms. In the short term, social tariffs and direct financial subsidies can alleviate the burden of low-income households, but they do not address the root causes of the problem – high energy costs, low energy efficiency of buildings and insufficient access to modern energy services. An example of this is the UK's winter fuel payment

policy, which provides financial support to senior citizens but is often criticised for lacking targeted assistance to truly vulnerable consumers.

The in-depth analysis reveals that the European energy market requires broader coordination among various stakeholders – energy companies, national regulators and civil society. There is a need for more harmonised approaches to defining vulnerable consumers to ensure more consistent protection across member states. However, it is important to maintain flexibility, allowing individual countries to tailor measures to their specific circumstances and needs. The variety in problem definitions means that the characteristics of energy poverty also vary, expanding the discussion beyond energy markets to address accessibility to energy services, whether provided through regulated markets or not. The focus on the accessibility of energy services emphasizes low-income households and the many factors, influencing energy efficiency, energy costs and disposable income. This leads to measures that target more structural issues that require longer-term solutions and the expertise of multiple stakeholders, not only in the energy industry, but also civil society and government. This distinction means that different approaches and actions are needed with an expanded role of the Commission that goes beyond vulnerable consumers to help tackle the broader challenge of energy poverty. However, the interconnected nature of these two issues calls for all emerging strategies to be synergistic and non-conflicting.

Social tariffs are another measure in this category, introduced in a number of Member States, including Cyprus, Spain, France, Greece, Portugal and Belgium. In Belgium, for example, all electricity and gas suppliers/providers are required to offer a social tariff to protected customers (the elderly, people with disabilities, residents of specific social housing with gas heating). There has been some criticism that such measures should be based on households rather than individuals. The French social tariff, which is currently being phased out, is tied to medical and health insurance allocations, yet a significant number of potential beneficiaries do not take advantage of it (ONPE, 2014). For those customers who do benefit, the effect is questionable, as the average amount of the social tariff is 8 €/month (ADEME, 2013).

There is a range of financial interventions, each designed differently based on the national context and with varying levels of targeting. A fundamental tension arises in much of the discussion around such measures: the increased targeting of vulnerable or energy-poor households versus the administrative complexity that may arise. Such an example is the case of winter fuel payments in the United Kingdom based on the age of the claimant rather than on other criteria (Preston, White, Blacklaws, & Hirsch, 2014). There are also challenges regarding how the measure is implemented, whether the

household is entitled to making the claim or if the benefit is provided automatically based on certain social security criteria.

What is evident is that financial interventions are crucial for addressing affordability in the short term and can be used to complement long-term measures that address the main structural issues underlying energy poverty. For example, in Scandinavian countries and the Netherlands, social support is provided, but significant efforts are also being made to improve the energy efficiency of the social housing stock. This integrated approach means that financial support does not become the primary policy for ensuring affordability; rather it serves as a transitional measure, offering a safety net without being overly relied upon.

Additional consumer protection measures are particularly important for protecting vulnerable consumers and ensuring access to regulated markets. Consequently, national regulatory authorities (NRAs) and energy companies play a crucial role in implementing a range of protections. These safeguards are essential to ensure that markets operate in a way that does not disadvantage vulnerable consumers, by ensuring supply, establishing codes of conduct for market participants and enabling companies to identify vulnerable consumers.

This category is largely dominated by measures to prevent the disconnection of vulnerable consumers, accounting for 40% of the measures reviewed in this area. For approximately 20% of Member States, this constitutes the basis and often the only explicit measure to provide consumer protection. and often the only explicit measure for consumer protection. Around 80% of member states have some form of protection against disconnection due to non-payment, with Bulgaria and the Czech Republic being exceptions.

In the long term, the study recommends developing more integrated strategies that combine short-term measures with long-term solutions. For example, in countries such as the Netherlands and the Scandinavian countries, social support is paired with large-scale investments in improving the energy efficiency of social housing. This approach results in a lasting reduction of energy poverty and an improved quality of life for vulnerable groups. Such solutions require an active role for national regulators to oversee energy policy implementation, as well as coordinated efforts between national governments and the European Commission.

The study concludes with recommendations for future actions, including enhancing the role of the European Commission in coordinating and monitoring energy poverty measures. Active cooperation between member states is needed to develop common indicators measuring energy poverty and to introduce new legislative measures that ensure more effective protection for vulnerable consumers. Short-term interventions should be accompanied by long-term

strategies focused on sustainable solutions, such as investments in energy efficiency and the development of accessible energy services for all citizens.

Conclusion

Investments in green energy and the efficient use of innovative technologies in building renovation are key mechanisms that can improve energy efficiency in households. The construction of sanitary facilities ensures access to energy for all households, eliminates energy inequalities and protects those at risk of poverty. Renovating buildings, particularly for low-income households with significant utility bill arrears, will help reduce the average energy costs and increase disposable income. Therefore, these measures are not income-based, i.e. they do not provide financial support to households. Instead, they are long-term initiatives with the potential to improve household energy consumption and energy efficiency in the residential sector. Consequently, we suggest that building renovations in these economies are crucial for governments to enhance the living standards of vulnerable populations.

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