

**Thai-German Programme on Energy Efficiency  
Development Plan (TGP-EEDP)**

Phase 2 / Task 1: Energy Efficiency Resource  
Standards (EERS)

**Design options for EERS in Thailand**

Toolbox for EERS working group

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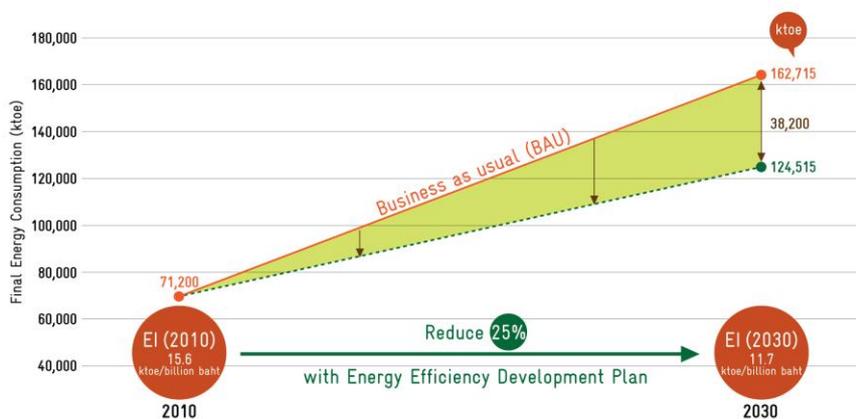
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# 1 EERS in the Thai EEDP

## 1.1 Background

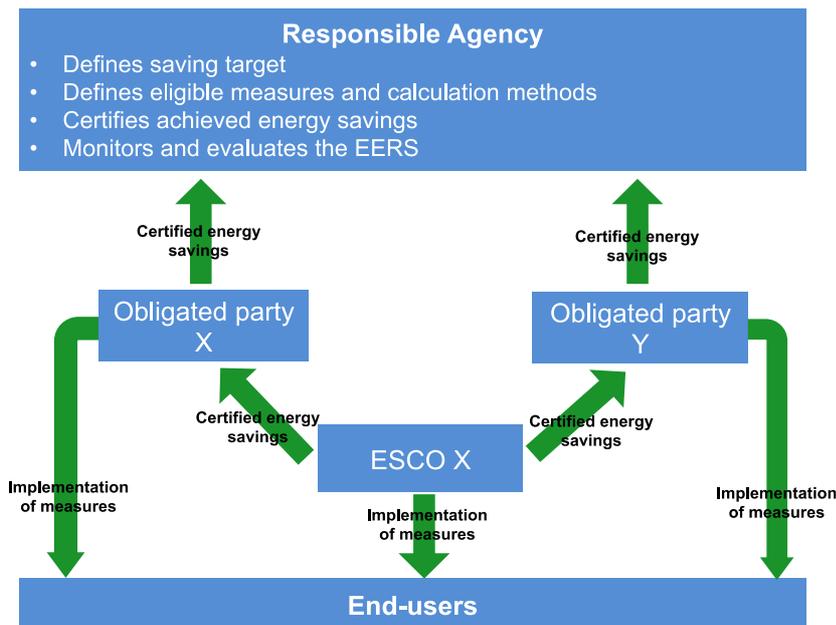
In 2011 the Ministry of Energy of Thailand published the “Thailand 20-Year Energy Efficiency Development Plan” (EEDP) followed by a more detailed “20-Year Energy Efficiency Action Plan” in 2013. The two plans state targets for energy efficiency and include a wide variety of measures to reach these targets. If implemented, they would contribute to a strong reduction of final energy consumption and greenhouse gas emissions.

**Figure 1: EEAP energy efficiency targets**



An important measure of the EEDP is to implement Energy Efficiency Resource Standards (EERS) for large-scale energy businesses (Ministry of Energy 2011). The basic design of EERS is shown in figure 2.

**Figure 2: Basic design of an EERS scheme**



More specific, EERS will require energy businesses in Thailand such as the electricity, oil and natural gas industry to provide energy efficiency measures in order to enable their customers to reduce energy use. According to the EEDP, the EERS should include a penalty clause for those energy businesses whose implementation outcome will be lower than their specified target. Those energy businesses whose achievements are greater than their specified target should be rewarded in each implementation year. The EERS is seen as an important mechanism to provide technical and financial assistance to small and medium enterprises (SMEs).

## 1.2 Timeline for EERS implementation in Thailand

The objective of enforcing EERS for the electricity supply industry is to impose the Energy Industry Act, B.E. 2550 (2007), on the operators of large-scale public electricity industries to help power consumers realize energy saving at no less than the minimum amount specified by the government (Ministry of Energy 2011, 2013). Major activities will be to

- appoint a working group, comprising representatives from energy-related government agencies and the private sector, as well as qualified experts, to determine the criteria of EERS application to the state-owned electricity enterprises.
- to jointly determine in this working group the minimum energy saving to be achieved (e.g. in a certain percentage of the average of the total generation or sales during the previous 3-year period), together with the approach for energy saving verification, as well as the rate of penalties for failure to meet the specified EERS and the incentive rate for achievement greater than the specified EERS.

In general, all measures that are formulated in the EEDP have to be implemented in the future. Therefore, we also assume that EERS will be implemented. Uncertainty exists only with respect to timing, scale and specific design. The indicated timeline in the EEDP for the implementation of EERS is as follows:

- Electricity supply industry:
  - 2011-2015: preparation/Study (if necessary)
  - 2016-2020: start operation/expansion
  - 2021-2030: evaluation/review (on a continuous basis)
- Natural gas and oil industry:
  - 2016-2020: Preparation/Study (if necessary)
  - 2021-2030: start operation/expansion

## 1.3 Support by GIZ and Wuppertal Institute

In Thailand, the institutional processes for the design and implementation of EERS are not clearly defined yet. Key government institutions, which are to be involved in the process of EERS development, are the Energy Policy and Planning Office (EPPO), the Energy Regulatory Commission (ERC), the Electricity

Generating Authority of Thailand (EGAT), the Metropolitan Electricity Authority (MEA) and the Provincial Electricity Authority (PEA).

Several participants of the EERS workshop on 27<sup>th</sup> March 2014 and follow-up meetings expressed their interest for support in terms of capacity building and technical input for the involved stakeholders in the EERS development process. GIZ and Wuppertal Institute (WI) have offered to provide such support. The specific support will depend on the future work plan and will be adapted to the needs expressed by the EERS stakeholders. Based on international experience with EERS, we have identified several issues that require further scrutiny and where GIZ and WI could provide support. A first starting point that has been agreed on is to create awareness and transparency for different options of EERS design that in principle exist for Thailand. These EERS design options are presented in this paper. Advantages and disadvantages for each of these options are discussed in the following sections.

## 2 Possible design options for EERS in Thailand

There are different available design options that need to be considered in the development and implementation process of EERS in Thailand.<sup>1</sup> This input paper presents these options by distinguishing seven basic categories of EERS design:

1. obligated parties and eligible energy savings
2. responsibility for implementation and oversight
3. target setting
4. eligible energy efficiency measures
5. monitoring and verification
6. cost recovery and financing
7. interactions with other policy measures in Thailand

These EERS design categories are classified in the following sections under “actors”, “targets” and “MRV & costs”. For each of the seven design category several implementation options for Thailand are presented and advantages as well as disadvantages discussed. Only the electricity sector in Thailand is considered in the following since EERS for the gas and oil industry will be implemented in Thailand later on. Other recommendations might be suitable for EERS targeting the gas and oil industry in Thailand due to different existing market and regulatory conditions.

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<sup>1</sup> The presented design elements are based on RAP (2011) and Wuppertal Institute (2014).

## 2.1 Actors

Obligated parties and eligible energy savings			
	EGAT	MEA & PEA	EGAT and MEA & PEA
Obligated party	<p><u>Advantage(s):</u></p> <ul style="list-style-type: none"> <li>good overview regarding the spatial and temporal distribution of capacity bottlenecks and corresponding peak load reduction potentials.</li> <li>long experience in demand side management (DSM) and sufficient administrative, infrastructural, personnel and financial resources (own DSM department) to deliver eligible savings</li> <li>EERS obligation as a justification for the future existence and possible extension of the DSM department</li> </ul>	<p><u>Advantage(s):</u></p> <ul style="list-style-type: none"> <li>enables the specification of spatially differentiated saving targets in order to account for differing saving potentials in urban and rural households</li> <li>existing relationships with end-users and availability of energy consumption data could facilitate the accurate choice and implementation of energy efficiency measures</li> </ul>	<p><u>Advantage(s):</u></p> <ul style="list-style-type: none"> <li>individual competences of obligated parties may lead to a larger portfolio of measures resulting in higher efficiency of the EERS</li> <li>higher competition may result in more innovative customer offers and might increase cost-effectiveness</li> </ul>
	<p><u>Disadvantage(s):</u></p> <ul style="list-style-type: none"> <li>no direct link to the customers</li> </ul>	<p><u>Disadvantage(s):</u></p> <ul style="list-style-type: none"> <li>less capacity to implement energy efficiency measures at large scale</li> </ul>	<p><u>Disadvantage(s):</u></p> <ul style="list-style-type: none"> <li>increased coordination requirements between obligated parties</li> <li>difficulty in setting individual saving targets and cost recovery rates due to different functions in the energy market (generation &amp; transmission vs. distribution and retail supply)</li> </ul>
Eligible actors and target achievement	<p><b>Only obligated parties allowed to produce eligible energy savings</b></p>	<p><b>Obligated and third parties (e.g. ESCOs) allowed to produce eligible energy savings (possibly including a maximum allowed quota for third party savings)</b></p>	<p><b>Obligated parties allowed to partially fulfil saving target by contribution to an energy efficiency fund</b></p>
	<p><u>Advantage(s):</u></p> <ul style="list-style-type: none"> <li>lower administrative effort for M&amp;V</li> </ul>	<p><u>Advantage(s):</u></p> <ul style="list-style-type: none"> <li>likely to increase the cost effectiveness of the EERS scheme due to measure specific specialization of ESCOs</li> <li>provides flexibility for obligated parties in target achievement</li> <li>likely to stimulate the ESCO market</li> </ul>	<p><u>Advantage(s):</u></p> <ul style="list-style-type: none"> <li>provides flexibility for obligated parties in target achievement</li> <li>generates additional funding for energy efficiency (e.g. for not yet cost-effective but innovative measures or priority groups or sectors)</li> </ul>
	<p><u>Disadvantage(s):</u></p> <ul style="list-style-type: none"> <li>may decrease the cost effectiveness of the EERS</li> </ul>	<p><u>Disadvantage(s):</u></p> <ul style="list-style-type: none"> <li>requires certification of ESCOs to ensure the qualitative delivery of eligible energy savings</li> </ul>	<p><u>Disadvantage(s):</u></p> <ul style="list-style-type: none"> <li>reduces incentive for business model transformation of obligated parties</li> </ul>

Responsibility for implementation and oversight			
Responsibility for implementation and oversight	Energy regulatory commission (ERC)	Energy Policy and Planning Office (EPPO)	Both ERC & EPPO
	<p><u>Advantage(s):</u></p> <ul style="list-style-type: none"> <li>experienced in regulatory issues and sufficient administrative, infrastructural, personnel and financial resources</li> <li>institutional status of ERC allows decision-making independent of short-term policy objectives</li> </ul>	<p><u>Advantage(s):</u></p> <ul style="list-style-type: none"> <li>directly involved in the process of EERS development and implementation</li> <li>competence in energy efficiency, e.g. for developing the calculation methods, controlling and regularly adapting eligible energy efficiency measures, implementing the M&amp;V scheme and continuous adjustments of the EERS</li> </ul>	<p><u>Advantage(s):</u></p> <ul style="list-style-type: none"> <li>availability of the competences of both organisations</li> </ul>
	<p><u>Disadvantage(s):</u></p> <ul style="list-style-type: none"> <li>no direct competence in energy efficiency, e.g. for developing the calculation methods, controlling and regularly adapting eligible energy efficiency measures, implementing the M&amp;V scheme and continuous adjustments of the EERS</li> </ul>	<p><u>Disadvantage(s):</u></p> <ul style="list-style-type: none"> <li>comparably less experienced in regulatory issues</li> <li>less independent due to its status as a subordinate authority of the Ministry of Energy</li> </ul>	<p><u>Disadvantage(s):</u></p> <ul style="list-style-type: none"> <li>possibly conflicting interests and unclear distribution of responsibilities between the two entities may decrease organisational efficiency</li> </ul>

## 2.2 Targets

Target setting					
Level of the target	<b>Low (e.g. in size of the existing DSM activities of EGAT, MEA &amp; PEA)</b>	<b>Medium (around 0.5% annually)</b>	<b>High (around 1-2% annually)</b>		
	<u>Advantage(s):</u> <ul style="list-style-type: none"> <li>political feasibility</li> <li>little additional administrative and financial efforts required from obligated parties</li> </ul>	<u>Advantage(s):</u> <ul style="list-style-type: none"> <li>considerable impact at manageable financial and administrative effort</li> </ul>	<u>Advantage(s):</u> <ul style="list-style-type: none"> <li>EERS contributes a large share to the energy saving target specified in the EEDP</li> </ul>		
	<u>Disadvantage(s):</u> <ul style="list-style-type: none"> <li>low impact in terms of additional energy savings</li> </ul>	<u>Disadvantage(s):</u> <ul style="list-style-type: none"> <li>may not tap the full potential of EERS</li> </ul>	<u>Disadvantage(s):</u> <ul style="list-style-type: none"> <li>significant administrative and financial efforts required from obligated parties</li> <li>relatively high increase on energy prices expected or high burden on public budget due to cost recovery</li> </ul>		
Target basis	<b>Final energy</b>	<b>Primary energy</b>	<b>CO<sub>2</sub>-emissions (equivalents)</b>		
	<u>Advantage(s):</u> <ul style="list-style-type: none"> <li>concept best known to end-users and energy providers</li> <li>comparability with most other existing EERS around the globe</li> </ul>	<u>Advantage(s):</u> <ul style="list-style-type: none"> <li>accounts for conversion factors → suitable for coverage of different fuels within EERS</li> <li>consideration of renewables and fuel switching measures facilitated</li> </ul>	<u>Advantage(s):</u> <ul style="list-style-type: none"> <li>consideration of renewables and fuel switching measures facilitated</li> <li>suitable if the main policy objective of the EERS scheme is to reduce GHG emissions</li> </ul>		
	<u>Disadvantage(s):</u>	<u>Disadvantage(s):</u> <ul style="list-style-type: none"> <li>concept more difficult to grasp for end-users and energy providers</li> <li>higher monitoring effort due to the application of primary energy factors</li> </ul>	<u>Disadvantage(s):</u> <ul style="list-style-type: none"> <li>higher monitoring effort due to the application of CO<sub>2</sub> emission factors</li> </ul>		

<b>Sub-target/ weighting factor</b>	<b>None</b>	<b>For low-income households</b>	<b>Differentiated between electricity, oil, gas savings</b>	<b>Priority measures (e.g. promotion of very energy-efficient appliances, innovative energy saving measures, deep building retrofits)</b>	
	<u>Advantage(s):</u> <ul style="list-style-type: none"> <li>no additional administrative effort for compliance monitoring</li> <li>theoretically most cost-effective approach</li> </ul>	<u>Advantage(s):</u> <ul style="list-style-type: none"> <li>contribution to alleviate (energy) poverty and improve living comfort</li> <li>relief of public budgets due to reduction of energy subsidies</li> </ul>	<u>Advantage(s):</u> <ul style="list-style-type: none"> <li>apportionment of the saving target to different fuels allows to account for their respective relevance as well as issues related to their consumption</li> </ul>	<u>Advantage(s):</u> <ul style="list-style-type: none"> <li>can generate long lasting impact by contributing to the transformation of markets for promoted technologies</li> </ul>	
	<u>Disadvantage(s):</u> <ul style="list-style-type: none"> <li>foregone opportunity to address multiple political objectives (e.g. reduction of energy poverty) with the same instrument</li> </ul>	<u>Disadvantage(s):</u> <ul style="list-style-type: none"> <li>increases M&amp;V requirements</li> <li>may reduce cost-effectiveness</li> </ul>	<u>Disadvantage(s):</u> <ul style="list-style-type: none"> <li>increases M&amp;V requirements</li> <li>may reduce cost-effectiveness</li> </ul>	<u>Disadvantage(s):</u> <ul style="list-style-type: none"> <li>increases M&amp;V requirements</li> <li>may reduce cost-effectiveness</li> </ul>	
<b>Target ctor</b>	<b>All sectors</b>	<b>Residential sector</b>	<b>Commercial sector</b>	<b>Industrial sector</b>	<b>Transportation sector</b>
	<u>Advantage(s):</u> <ul style="list-style-type: none"> <li>allows obligated parties to implement the most cost-effective measures across all sectors</li> </ul>	<u>Advantage(s):</u> <ul style="list-style-type: none"> <li>has not been sufficiently covered by Thai energy efficiency policy so far</li> </ul>	<u>Advantage(s):</u> <ul style="list-style-type: none"> <li>obligated parties could offer specialised advice and technical support to enable SMEs and also bigger companies to apply for the SOP funding</li> </ul>	<u>Advantage(s):</u> <ul style="list-style-type: none"> <li>high energy saving potential in Thailand</li> </ul>	<u>Advantage(s):</u> <ul style="list-style-type: none"> <li>highest energy saving potential in Thailand</li> </ul>
	<u>Disadvantage(s):</u> <ul style="list-style-type: none"> <li>may result in unbalanced implementation of measures in one sector at the expense of another, in which savings potential remains untapped</li> </ul>	<u>Disadvantage(s):</u> <ul style="list-style-type: none"> <li>lower overall technical savings potential in comparison to the other sectors in Thailand</li> </ul>	<u>Disadvantage(s):</u> <ul style="list-style-type: none"> <li>hazard of double funding and double counting of the savings due to the parallel implementation of the SOP scheme</li> </ul>	<u>Disadvantage(s):</u> <ul style="list-style-type: none"> <li>hazard of double funding and double counting of the savings due to the parallel implementation of other industrial energy efficiency policies such as the DSM bidding scheme or the 30/70 subsidy programme</li> <li>subsidizing the direct implementation by industrial enterprises themselves is likely to be more cost-effective than to delegate this task to obligated energy companies</li> </ul>	<u>Disadvantage(s):</u> <ul style="list-style-type: none"> <li>range of (standardizable) measures that obligated parties could promote is very limited compared to the overall potential.</li> </ul>

Eligible energy efficiency measures			
Eligible energy efficiency measures	Standard measures	Individual measures	Both standard and individual measures
	<p><u>Advantage(s):</u></p> <ul style="list-style-type: none"> <li>facilitated monitoring due to availability of deemed savings or engineering estimates regarding savings typically achieved by implementing standard measures</li> <li>low M&amp;V costs for obligated parties and for authority responsible for regulatory oversight</li> </ul>	<p><u>Advantage(s):</u></p> <ul style="list-style-type: none"> <li>may induce innovative energy saving solutions</li> </ul>	<p><u>Advantage(s):</u></p> <ul style="list-style-type: none"> <li>most cost-effective mix of measures may be selected by parties to fulfil their obligation</li> </ul>
	<p><u>Disadvantage(s):</u></p> <ul style="list-style-type: none"> <li>restriction on listed measures prevents innovative energy saving solutions</li> </ul>	<p><u>Disadvantage(s):</u></p> <ul style="list-style-type: none"> <li>higher M&amp;V costs for obligated parties and for authority responsible for regulatory oversight</li> </ul>	<p><u>Disadvantage(s):</u></p> <ul style="list-style-type: none"> <li>higher M&amp;V costs for obligated parties and for authority responsible for regulatory oversight</li> </ul>

## 2.3 MRV & Costs

Monitoring and verification				
Measuring energy savings	<p><b>Deemed savings</b></p> <p><u>Advantage(s):</u></p> <ul style="list-style-type: none"> <li>reduces transaction costs for obligated parties and for authority responsible for regulatory oversight</li> <li>suitable for simple standard measures (smaller measures, appliances and technical equipment with high market penetration)</li> <li>accountable energy savings are transparent for obligated parties as pre-defined on a list with standard measures</li> </ul>	<p><b>Standard calculation formulae with mixed individual and deemed input values</b></p> <p><u>Advantage(s):</u></p> <ul style="list-style-type: none"> <li>suitable for measures for which the simple deemed savings approach is not reliable enough and the achievable energy savings depend on certain individual factors (e.g. building size, technology size, climate zone, lifetime)</li> </ul>	<p><b>Engineering estimates</b></p> <p><u>Advantage(s):</u></p> <ul style="list-style-type: none"> <li>suitable for complex individual measures for which the deemed saving approaches are not reliable enough and metering/simulation is not practical</li> </ul>	<p><b>Metering or simulating energy consumption of specific end-uses or whole systems</b></p> <p><u>Advantage(s):</u></p> <ul style="list-style-type: none"> <li>suitable for individual, larger or complex energy efficiency measures (e.g. process improvements in industrial sector)</li> <li>most accurate M&amp;V approach</li> </ul>
	<p><u>Disadvantage(s):</u></p> <ul style="list-style-type: none"> <li>not suitable for more complex individual measures</li> <li>M&amp;V and regular updates for deemed savings values necessary</li> </ul>	<p><u>Disadvantage(s):</u></p> <ul style="list-style-type: none"> <li>higher costs and expertise necessary to define reliable calculation formulae for the respective measures</li> <li>M&amp;V and regular updates for calculation formulae necessary</li> </ul>	<p><u>Disadvantage(s):</u></p> <ul style="list-style-type: none"> <li>higher M&amp;V costs for obligated parties and the authority responsible for regulatory oversight</li> </ul>	<p><u>Disadvantage(s):</u></p> <ul style="list-style-type: none"> <li>highest M&amp;V costs for obligated parties and the authority responsible for regulatory oversight</li> </ul>
Accounting of energy savings	<p><b>Annual savings</b></p> <p><u>Advantage(s):</u></p> <ul style="list-style-type: none"> <li>facilitates reporting and accounting of energy savings</li> <li>favours in general low-cost measures with short lifetimes</li> </ul>	<p><b>Lifetime savings</b></p> <p><u>Advantage(s):</u></p> <ul style="list-style-type: none"> <li>creates incentive for obligated parties to implement measures with relatively long lifetimes that are often more cost-effective in the long term than low-cost measures with short lifetimes</li> </ul>	<p><b>Discounted lifetime savings</b></p> <p><u>Advantage(s):</u></p>	
	<p><u>Disadvantage(s):</u></p> <ul style="list-style-type: none"> <li>creates strong disincentive for obligated parties to implement measures with relatively long lifetimes (that are often more cost-effective in the long term than low-cost measures with short lifetimes), which may lead to lock-in effects</li> </ul>	<p><u>Disadvantage(s):</u></p>	<p><u>Disadvantage(s):</u></p> <ul style="list-style-type: none"> <li>present savings are valued over future savings at the cost of implementation of measures with relatively long lifetimes, which may lead to lock-in effects</li> <li>complicates accounting and reporting</li> <li>suitable discount rates are difficult to define</li> </ul>	

Cost recovery and financing				
Cost recovery	<b>Cost recovery of actual programme costs and net lost revenues up to a certain threshold (per unit of energy savings or measure)</b>	<b>Unitary technology-neutral cost recovery rate per unit energy saved</b>		
	<u>Advantage(s):</u> <ul style="list-style-type: none"> <li>no disincentives to promote innovative more costly measures</li> <li>might result in a larger portfolio of implemented measures</li> </ul>	<u>Advantage(s):</u> <ul style="list-style-type: none"> <li>incentivises obligated parties to invest in highly cost-effective measures</li> <li>low administrative costs</li> </ul>		
	<u>Disadvantage(s):</u> <ul style="list-style-type: none"> <li>less cost-effective in the short-term</li> <li>higher administrative costs for approving actual eligible cost recovery rates</li> </ul>	<u>Disadvantage(s):</u> <ul style="list-style-type: none"> <li>may lead to cherry picking by obligated parties: costly but innovative measures might not be promoted by the obligated parties</li> <li>requires regulatory authority to set the right level of the cost recovery rate and continuous adjustments necessary</li> </ul>		
Financing	<b>Small surcharge on electricity tariffs or adjustment of adder Ft</b>	<b>Encon fund</b>	<b>Governmental budget</b>	<b>International funding sources (e.g. world bank, NAMA facility, Green Climate Fund)</b>
	<u>Advantage(s):</u> <ul style="list-style-type: none"> <li>independent of public budget resulting in longer-term stability of the EERS</li> </ul>	<u>Advantage(s):</u> <ul style="list-style-type: none"> <li>(to some extent) independent of public budget resulting in longer-term stability of the EERS</li> </ul>	<u>Advantage(s):</u> <ul style="list-style-type: none"> <li>no energy price increase necessary improving public acceptance for the implementation of EERS</li> </ul>	<u>Advantage(s):</u> <ul style="list-style-type: none"> <li>no energy price increase necessary improving public acceptance for the implementation of EERS</li> <li>no funding from governmental budget</li> </ul>
	<u>Disadvantage(s):</u> <ul style="list-style-type: none"> <li>low public acceptance for EERS possible due to expected electricity price increase</li> </ul>	<u>Disadvantage(s):</u> <ul style="list-style-type: none"> <li>limited budget in Encon fund available for a wide portfolio of different energy efficiency and renewable energy measures → may result in reduced funding of other measures not covered by the EERS</li> </ul>	<u>Disadvantage(s):</u> <ul style="list-style-type: none"> <li>EERS might be discontinued in times when public budget is under pressure or energy efficiency is not high on the political agenda</li> </ul>	<u>Disadvantage(s):</u> <ul style="list-style-type: none"> <li>not clear whether international funding sources for EERS are (sufficiently) available</li> <li>international funds available only for a certain timeframe (problem of phasing out of funding)</li> </ul>

Interactions with other policy measures in Thailand				
Interactions	Address energy efficiency technologies that are not sufficiently covered by existing policies in Thailand	Complement existing policies in order to make them more effective (e.g. by performing additional informational, marketing or advisory activities to improve the uptake of existing financial incentive schemes or to build on the energy labelling to enhance its effectiveness)	<p>Combination with SOP scheme:</p> <p>SOP scheme provides financial incentives and the EERS provides advice and technical support to SMEs</p> <p>OR</p> <p>the obligated party(s) operate(s) the SOP scheme, managing project selection and handing out the SOP payments to projects or to customers buying the standard technologies targeted, allowing the party(s) to produce eligible energy savings to achieve their EERS target</p>	Initial implementation of EERS as a parallel mechanism to gradually replace policy instruments that may be discontinued after a certain timeframe, e.g. due to budgetary or legal reasons
	<p><u>Advantage(s):</u></p> <ul style="list-style-type: none"> <li>generates additional energy savings</li> <li>no overlap with other policies, avoiding double funding and double counting of savings</li> </ul>	<p><u>Advantage(s):</u></p> <ul style="list-style-type: none"> <li>may improve performance of existing energy efficiency policies</li> <li>relatively lower financial burden put on obligated parties</li> </ul>	<p><u>Advantage(s):</u></p> <ul style="list-style-type: none"> <li>may improve performance of SOP scheme</li> <li>relatively lower financial burden put on obligated parties</li> </ul>	<p><u>Advantage(s):</u></p> <ul style="list-style-type: none"> <li>allows continuation of existing energy saving activities beyond policy lifetime</li> <li>switch to budget neutral financing of energy saving measures</li> </ul>
	<p><u>Disadvantage(s):</u></p> <ul style="list-style-type: none"> <li>possibly low existing energy saving potential</li> </ul>	<p><u>Disadvantage(s):</u></p> <ul style="list-style-type: none"> <li>Possible overlap with other policies, which may result in double funding and double counting of savings</li> <li>Not clear whether and how many additional energy savings are generated</li> </ul>	<p><u>Disadvantage(s):</u></p> <ul style="list-style-type: none"> <li>Not clear whether and how many additional energy savings are generated</li> </ul>	<p><u>Disadvantage(s):</u></p> <ul style="list-style-type: none"> <li>no additional energy savings</li> <li>no new measures are implemented through the EERS</li> </ul>

### 3 References

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