EPBD REVISION TRIALOGUE NEGOTIATIONS

E.DSO position July 2023

WHAT WE SUPPORT

- E.DSO welcomes the acknowledgement of the importance of **smart and bi-directional charging**
- E.DSO welcomes the obligation to include '**flexibility of building's overall electricity demand in relation to the grid**' as a key functionality in the methodology used to define smart readiness as proposed by the Commission & the Council

WHAT IS MISSING

- The full recognition of **electricity from the grid to cover energy needs of ZEBs,** as energy from the grid is important to protect consumers from distortions or additional cost.
- **The definition of 'energy from renewable sources produced nearby'** should remove all requirements for dedicated distribution networks, as it goes against energy efficiency targets and risks causing increased system costs for consumers.
- National building Renovation Plans should include an overview of national initiatives to promote **smart technologies and well-connected buildings and communities**, as well as **skills and education in the construction and energy efficiency sectors.**
- The addition of **a pre-evaluation criterium for network availability** for the practical implementation of the deployment of suitable solar energy installations in buildings. This way, the most efficient deployment of solar energy in buildings is ensured.
- To ensure efficiency, enabling simultaneous use of recharging points must be based on evaluations by **smart management systems, recognizing load capacities and network needs**
- The methodology for assessing smart readiness of buildings should consider the **interoperability between the buildings and network system.**

ABOUT US

E.DSO promotes and enables **customers empowerment** and the increase in the use of **clean energy sources** through electrification, the development of smart and digital grid technologies in real-life situations, new market designs and regulation. We gather **35 leading electricity DSOs**, including 2 national associations, cooperating to ensure the reliability of Europe's electricity supply for consumers and enabling their active participation in our energy system. How? By shaping smarter grids for your future.

https://www.edsoforsmartgrids.eu/

E.DSO amendments on the revision of the EPBD Directive (EU) 2010/31

E.DSO Proposed changes appearing as ~~deleted~~ or added

Co-legislators amendments ***highlighted***

N°	Commission proposal	EP proposal	Council proposal	E.DSO proposal	Justification
	Article 2 Definition				
1	[2] 'zero-emission building' means a building with a very high energy performance, as determined in accordance with Annex I, where the very low amount of energy still required is fully covered by energy from renewable sources generated on-site, from a renewable energy community within the meaning of Directive (EU) 2018/2001 [amended RED] or from a district	[2] 'zero-emission building' means a building with a very high energy performance, as determined in accordance with Annex***es*** I ***and III, which contributes to the optimisation of the energy system through demand-side flexibility,*** where ***any*** very low ***residual*** amount of energy still required is fully covered by energy from:	[2] 'zero-emission building' means a building with a very high energy performance, as determined in accordance with Annex I, ***requiring zero or a*** very low amount of energy, ***producing zero on-site carbon emissions from fossil fuels and producing zero or a very low amount of operational greenhouse gas emissions***, in accordance with the	[2] 'zero-emission building' means a building with a very high energy performance, as determined in accordance with Annex**es** I **and III, requiring zero or a** very low amount of energy, **producing zero on-site carbon emissions from fossil fuels and producing zero or a very low amount of operational greenhouse gas emissions,** where the very low amount of energy still required is fully covered by energy from: (a) renewable sources generated **or stored** on-site **in accordance with Directive (EU) 2018/2001 [amended RED],**	The revised proposal introduces the pathway for achieving a zero-emission building stock by 2050. However, it fails to establish a clear definition of zero-emission buildings. **The definition of a "zero-emission building" should not treat the grid as secondary to be used only when other sources are not feasible.** Grid connection is currently

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	heating and cooling system, in accordance with the requirements set out in Annex III;	***(a)*** renewable sources generated or stored on-site; ***(b) renewable sources generated nearby off-site and delivered through the grid in accordance with Directive (EU) 2018/2001 [amended RED];*** ***(c)*** a renewable energy community within the meaning of Directive (EU) 2018/2001 [amended RED]; or ***(d) renewable energy and waste heat from an efficient*** district heating and cooling system ***within the meaning of Directive (EU) …/…. [recast EED],*** in accordance with the requirements set out in Annex III;	requirements set out in ***Article 9b***	(b) renewable sources generated nearby off-site **in accordance with Directive (EU) 2018/2001 [amended RED],** (ba) renewable sources delivered through the **grid in accordance with Directive (EU) 2018/2001 [amended RED],** (c) a renewable energy community within the meaning of Directive (EU) 2018/2001 [amended RED]; or (d) **renewable energy and waste** heat from an efficient district heating and cooling system **within the meaning of [amended EED],** in accordance with the requirements set out in Annex III;	the main way to supply most buildings with electricity. It allows the energy sharing between residential and non-residential buildings, as well as between the different geographical typologies (e.g., rural areas and cities). The grid is central to the security and quality of supply. Co-legislators need to fully recognize the possibility to cover the energy needs of a ZEB with renewable energy from the grid (as outlined in the REDIII) in the definition under Article 2. This is of utmost importance to avoid economic inefficiencies and create consistency between existing legislation, namely

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					Directive (EU) 2019/944, Regulation (EU) 2019/943. This is also true, with regard to the Energy Efficiency First Principle (EEFP), as defined in Recommendation (EU) 2021/1749 and Art. 3 of [amended EED]. It must also be applied to ZEB. Decentralised renewable energy generation is reality, however, in this particular case, it cannot be considered the most efficient solution, as a grid connection will lead to reduced storage needs and generation costs, provides security and quality of supply. To reach the ambitious national decarbonisation targets, renewable energy delivered through the grid is and will be, the most cost-

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					efficient solution to achieve these in the building sector. Finally, a level playing field, as outlined in the amended RED Directive, among market participants must be maintained, something the proposals of the COM and Co-legislators seem to forget, by treating energy communities advantageous.
2	[49] 'energy from renewable sources produced nearby' means energy from renewable sources produced within a local or district level perimeter of the building assessed, which fulfils all the following conditions: (a) it can only be distributed and used within that local and district level perimeter	[49] 'energy from renewable sources produced nearby' means energy from renewable sources produced within a local or district level perimeter of the building assessed, which fulfils all the following conditions: (a) it can only be distributed and used within that local and district level perimeter	[49] 'energy from renewable sources produced nearby' means energy from renewable sources produced within a local or district level perimeter of the building assessed, which fulfils all the following conditions: (a) it can only be distributed and used within that local and district level perimeter	[49] 'energy from renewable sources produced nearby' means energy from renewable sources produced within a local or district level perimeter of the building assessed, which fulfils ~~all~~ the following conditions: (a) can ~~only~~ be distributed and used within that local and district level perimeter through a dedicated **public** distribution network, (b) it allows for the calculation of a specific primary energy factor valid only for the energy from renewable sources produced	E.DSO urges Co-legislators to consider the effect of a deliberate exclusion of energy from the grid in this definition, which **could cause increased system costs for the consumer**, redundancy in the overall process and eventual non-alignment to the Electricity Directive 2019/944.

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	through a dedicated distribution network; (b) it allows for the calculation of a specific primary energy factor valid only for the energy from renewable sources produced within that local or district level perimeter; and (c) it can be used on-site of the building assessed through a dedicated connection to the energy production source, that dedicated connection requiring specific equipment for the safe supply and metering of energy for self-use of the building assessed;	through a dedicated distribution network; (b) it allows for the calculation of a specific primary energy factor valid only for the energy from renewable sources produced within that local or district level perimeter; and (c) it can be used on-site of the building assessed through a dedicated connection to the energy production source, that dedicated connection requiring specific equipment for the safe supply and metering of energy for self-use of the building assessed;	through a dedicated distribution network; (b) it allows for the calculation of a specific primary energy factor valid only for the energy from renewable sources produced within that local or district level perimeter; and (c) it can be used on-site of the building assessed through a dedicated connection to the energy production source, that dedicated connection requiring specific equipment for the safe supply and metering of energy for self-use of the building assessed;	within that local or district level perimeter; and (c) it can be used on-site of the building assessed through a ~~dedicated~~ connection to the energy production source, that ~~dedicated~~ connection requiring specific equipment for the safe supply and metering of energy for self-use of the building assessed;	Thus, the requirement for 'dedicated distribution networks' in the definition of 'energy from renewable sources produced nearby' must be removed since it goes against the efficiency targets. The public network allows consumers to choose electricity providers under the principles of freedom of choice and non-discrimination. In comparison, costly private networks only serve certain consumers and producers leaving the more vulnerable customers to bear all the costs. In this sense, we would also like to reinforce the necessity of including in the definition under Art 2 (49), that **local renewable energy should be**

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					delivered through the public distribution grid.
	Supporting example of E.DSO justification – Iberdrola Taking the proposed definition into consideration, electric heat pumps (eHP) will have to be connected to a renewable source of production in a building in order to consider it as a "zero-emission building". However, a building could still be "zero-emission" and have a very high energy performance if it uses an eHP that extracts on-site renewable energy from the environment and uses renewable energy from the grid as driving energy.				
	Article 3 - National Building Renovation Plan				
2	[1] Each Member State shall establish a national building renovation plan to ensure the renovation of the national stock of residential and non-residential buildings, both public and private, into a highly energy efficient and decarbonised building stock by 2050, with the objective to transform existing buildings into zero-emission buildings. Each building renovation plan shall encompass:	[1] Each Member State shall establish a national building renovation plan to ensure the renovation of the national stock of residential and non-residential buildings, both public and private, into a highly energy efficient and decarbonised building stock by 2050, with the objective to transform existing buildings into zero-emission buildings. Each building renovation plan ***shall comply with the energy efficiency first***	[1] Each Member State shall establish a national building renovation plan to ensure the renovation of the national stock of residential and non-residential buildings, both public and private, into a highly energy efficient and decarbonised building stock by 2050, with the objective to transform existing buildings into zero-emission buildings. Each building renovation plan shall encompass:	1] Each Member State shall establish a national building renovation plan to ensure the renovation of the national stock of residential and non-residential buildings, both public and private, into a highly energy efficient and decarbonised building stock by 2050, with the objective to transform existing buildings into zero-emission buildings. Each building renovation plan **shall take into consideration Smart Readiness Indicators as outlined in Annex IV and** encompass: (…) **(f) an overview of national initiatives to promote smart technologies and well-**	E.DSO advocates for the reintegration of former subparagraph f. Above that, we consider it valuable to include a direct proper link to the Smart Readiness Indicators of the buildings as outlined in Annex IV.

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	(…)	***principle and*** shall encompass: (…)	(…)	**connected buildings and communities, as well as skills and education in the construction and energy efficiency sectors; and** (…)	
	Article 9a – Solar energy in buildings				
3		***[NEW]*** ***[1] By … [24 months after the date of entry into force of this Directive], Member States shall ensure that all new buildings are designed to optimise their solar energy generation potential on the basis of the solar irradiance of the site, enabling the subsequent cost-effective installation of solar technologies.***	***[NEW]*** ***Member States shall ensure that all new buildings are designed to optimise their solar energy generation potential on the basis of the solar irradiance of the site, enabling the later cost-effective installation of solar technologies.*** ***Member States shall ensure the deployment of***	**[NEW]** Member States shall ensure that all new buildings are designed to optimise their solar energy generation potential on the basis of the solar irradiance of the site **and taking into account the stability of the electricity grid**, enabling the later cost-effective installation of solar technologies. Member States shall ensure the deployment of suitable solar energy installations: (a) by 31 December 2026, on all new public and non-residential buildings with useful floor area over 250 m2;	E.DSO welcomes the addition of Article 9a as introduced by the GA of the Council. To further improve the criteria for the practical implementation of the deployment of suitable solar energy installations, **we consider it of utmost importance to include a pre-evaluation criterium ensuring network availability is provided**

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		[2] Member States shall encourage, through information measures and streamlined permitting schemes, the deployment of suitable solar energy installations in all buildings undergoing major renovation or deep renovation in combination with the renovation of the building envelope, with the replacement of technical building systems and with the installation of equipment with electricity storage, EV-charging infrastructure, heat pump technology, and building automation and control systems. ***[3] Member States shall ensure the deployment of suitable solar energy installations, if technically suitable and***	***suitable solar energy installations:*** ***(a) by 31 December 2026, on all new public and non-residential buildings with useful floor area over 250 m2;*** ***(b) by 31 December 2027 on all existing public and non-residential buildings with undergoing a major or a deep renovation with useful floor area over 400 m2; and*** ***(c) by 31 December 2029, on all new residential buildings.*** ***Member States shall define, and make publicly available, criteria at national level for the practical implementation of these obligations, and for possible exemptions for specific types of buildings, including those mentioned in Article 9, paragraph 6, taking into***	(b) by 31 December 2027 on all existing public and non-residential buildings with undergoing a major or a deep renovation with useful floor area over 400 m2; and (c) by 31 December 2029, on all new residential buildings. Member States shall define, and make publicly available, criteria at national level for the practical implementation of these obligations, and for possible exemptions for specific types of buildings, including those mentioned in Article 9, paragraph 6, taking into account also the principle of technological neutrality, and in accordance with the assessed technical and economic potential of the solar energy installations and the characteristics of the buildings covered by this […] provision. When defining such criteria Member States **ensure sufficient network availability and** also take into account other relevant factors, such as structural integrity, biodiversity, stability of the electricity network.	together with the need to directly refer to the stability of the electricity grid.

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		economically and functionally feasible, as follows: ***(a) by … [24 months after the date of entry into force of this Directive], on all new public and new non-residential buildings;*** ***(b) by 31 December 2026, on all existing public and non-residential buildings;*** ***(c) by 31 December 2028, on all new residential buildings and roofed carparks;*** ***(d) by 31 December 2032, on all buildings undergoing major renovation.*** ***[4] Member States shall establish and make publicly available criteria at national level for the practical implementation of the deadlines set out in***	***account also the principle of technological neutrality, and in accordance with the assessed technical and economic potential of the solar energy installations and the characteristics of the buildings covered by this […] provision. When defining such criteria Member States shall also take into account other relevant factors, such as structural integrity, biodiversity, stability of the electricity network.***		

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		paragraph 3 and for possible exemptions for specific types of buildings, in accordance with the assessed technical and economic potential of the solar energy installations and the characteristics of the buildings covered by those obligations. ***[5] The deployment of suitable solar energy installations on all new residential buildings and roofed carparks and on all buildings undergoing major renovation as set out in paragraph 3, points (c) and (d) shall be combined with attic and roof insulation where appropriate, taking into account the functioning of the building. The deployment of suitable solar energy installations as set out in paragraph 3 shall be combined with the***			

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		permit-granting process for the installation of solar energy equipment in artificial structures laid down in Article 16c of Directive (EU) 2018/2001 (amended RED as proposed by COM(2022)0222). For solar installations below 50 kW, Member States shall allow a simple-notification procedure as provided for in Article 17 of Directive (EU) 2018/2001. ***[6] Member States shall establish a pathway with numerical targets for their national contribution to the deployment of solar energy and heat pumps in buildings in their national building renovation plans.*** ***[7] Member States shall ensure that their regulatory frameworks***			

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		provide the necessary administrative, technical and financial capacities and incentives for the deployment of solar energy in buildings, including in combination with technical building systems such as domestic batteries, heat pumps for self-consumption, or large-scale heat pumps distributing heat through district heating systems. Member States shall ensure an equal regulatory playing field for all solar and heating technologies. ***[8] Member States shall ensure that representatives of national regulatory authorities, distribution system operators, renewable energy communities, consumer organisations storage***			

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		providers and other stakeholders assess the need for additional measures with regard to the distribution system to achieve the objectives of this Article. That assessment shall include the required connection and procurement of flexible distributed energy generation in line with the provisions of Regulation (EU) 2019/943 of the European Parliament and of the Council(29) and Directive (EU) 2019/944 of the European Parliament and of the Council(30), in particular considering a necessary level playing field and fair remuneration for active customers and energy communities.			

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		[9] Member States shall encourage measures to ensure the fire safety of solar energy installations in buildings, including in combination with technical building systems such as domestic batteries or heat pumps for self-consumption.			
	Article 9b – Zero emission buildings				
4			***[NEW]*** ***[1] Member States shall take the necessary measures to ensure that the energy use of a new or renovated zero-emission building complies with a maximum threshold established at the Member State level in their building renovation plans. This maximum threshold shall be set with a view to achieving***	**[Delete as considered under amendments to Article 2 paragraph 2 point 1]**	E.DSO considers the conditions under Article 9b as too ambiguous, especially when it comes to the use of energy from the grid to cover the total annual primary energy use of ZEBs. Where the use of other renewable or low carbon energy resources (listed under point (a) to (d) of the Council's additions) is technically and economically not feasible,

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			at least cost optimal levels. ***In order to ensure technical and economic feasibility, Member States may decide to adjust both thresholds as referred to in this subparagraph for renovated buildings.*** ***[1a] Member States shall ensure that the total annual primary energy use of a new or renovated zero-emission building is covered, where technically and economically feasible, by:*** ***(a) energy from renewable sources generated onsite or nearby, fulfilling the criteria of Article 7 of Directive (EU) 2018/2001 [amended RED];*** ***(b) energy from renewable sources provided from a***		the **inclusion of energy from the grid is imperative as it ensures the protection of consumers** from distortions or additional cost and allows smart buildings to benefit from the decarbonised electricity of the system. As explained, we hold, that a link to Directive [amended RED] as well as the EEFP, as defined in the [amended EED] Directive, are crucial to maintain firstly, consistency between existing legislation, and secondly, to ensure that renewable energy from the grid is allowed as for the energy use of a ZEB. By definition, the EEFP underlines that the most efficient way to decarbonise the building sector, must take into account the most cost-efficient decarbonisation measures, which in some cases, can

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			renewable energy community within the meaning of Article 22 of Directive (EU) 2018/2001 [amended RED]; or ***(c) energy from an efficient district heating and cooling system in accordance with Article 24(1) of Directive (EU) .../... [recast EED];*** ***(d) energy from carbon free sources.*** ***2. Member States shall ensure that a zero-emission building does not cause any on-site carbon emissions from fossil fuels***		only be provided by the electricity grid.
	Article 12 – Infrastructure for sustainable mobility				
5	[1] (...) Member States shall ensure that the pre-cabling is	[1] (...) Member States shall ensure that the pre-	[1] (...) Member States shall ensure that the pre-cabling	[1] (...) **"By the use of smart management systems and considering demand side**	Additions to this Article, which aim at enabling simultaneous use of recharging points must take

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	dimensioned so as to enable the simultaneous use of the expected number of recharging points. (…)	cabling is dimensioned so as to enable the simultaneous ***and efficient*** use of the expected number of recharging points ***and support, where appropriate, the installation of a load or charging management system, to the extent that this is technically and economically feasible and justifiable.*** (…)	***and ducting*** are dimensioned so as to enable the simultaneous use of the ***required*** number of recharging points. (…)	**management solutions that recognize grid infrastructure needs,** Member States **may support, where technically and economically appropriate,** ~~–shall ensure that the~~ pre-cabling ~~is~~ dimensioned so as to enable the simultaneous ***and efficient*** use of the ***required*** number of recharging points **"** (…)	into consideration the necessity of using **smart management recognizing load capacities and network needs.** The simultaneous use of all recharging points cannot automatically be considered efficient. Most consumers would change the time to charge their vehicles to avoid peak loads, being especially motivated by the opportunity to reduce their consumption bills. For this reason, requiring that the pre-cabling is dimensioned so as to enable the simultaneous use of all recharging points contradicts the wider support for smart charging in European legislative initiatives, including in AFIR and in RED. Requiring a simultaneous use of all recharging points at full power at the same time would not be smart and

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					efficient way to approach infrastructure for sustainable mobility. Such provision in EPBD is not coherent with other measures of the Fit for 55 package and would be costly **The same must be applied in paragraph 4 of this article.**
	Annex III - Requirements for new and renovated zero-emission buildings and calculation of life-cycle global warming potential (GWP)				
6	[2] The total annual primary energy use of a new or renovated zero-emission building shall be fully covered, on a net annual basis, by – energy from renewable sources generated on-site and fulfilling the criteria of Article 7 of Directive (EU)	[2] The total annual primary energy use of a new or renovated zero-emission building shall be fully covered, on a net annual **or seasonal** basis, by – energy from renewable sources generated ***or stored*** on-site and fulfilling the criteria of	***Deleted***	[2] The total annual primary energy use of a new or renovated zero-emission building shall be fully covered, on a net annual **or seasonal** basis, by: – energy from renewable sources generated **or stored** on-site and fulfilling the criteria of Article 7 of Directive (EU) 2018/2001 [amended RED], – renewable energy provided from a renewable energy community within the	To read with comments made to Article 2 and the definition of ZEB.

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	2018/2001 [amended RED], – renewable energy provided from a renewable energy community within the meaning of Article 22 of Directive (EU) 2018/2001 [amended RED], or – renewable energy and waste heat from an efficient district heating and cooling system in accordance with Article (24(1) of Directive (EU) …/… [recast EED].	Article 7 of Directive (EU) 2018/2001 [amended RED], – ***energy for self-consumption and joined self-consumption within the meaning of Directive (EU) 2018/2001 [amended RED] or local sharing of*** renewable energy ***production, including through a third-party market actor,*** or from a renewable energy community within the meaning of Article 22 of Directive (EU) 2018/2001 [amended RED], or – renewable energy ***from district heating and cooling system or waste heat.***		meaning of Article 22 of Directive (EU) 2018/2001 [amended RED], or **– renewable sources delivered through the grid in accordance with Directive (EU) 2018/2001 [amended RED],** or – renewable energy or **waste heat** from an **efficient** district heating and cooling system in accordance **with Article (24(1) of Directive (EU) …/… [recast EED].**	
7	[4] Only where, due to the nature of the building or lack of access to renewable energy communities or	[4] ***Where***, due to the nature of the building or lack of access to renewable energy	***Deleted***	[4] ***Where***, due to the nature of the building or lack of access to—~~renewable energy communities or~~ eligible district heating and	E.DSO recommends concentrating paragraph 4 in Annex III solely on heating and cooling and delete any

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	eligible district heating and cooling systems, it is technically not feasible to fulfil the requirements under the first paragraph, the total annual primary energy use may also be covered by energy from the grid complying with criteria established at national level.	communities or eligible district heating and cooling systems ***or waste heat***, it is technically not feasible to ***fully comply with*** the requirements under the first paragraph, ***the remaining share or all of the*** total annual primary energy use may also be covered by ***renewable*** energy from the grid, ***documented with power purchase agreements and renewable heating and cooling purchase agreements as referred to in Directive (EU) 2018/2001 [amended RED], or ~~renewable~~ energy from an efficient district heating and cooling system in accordance with Article 24(1) of Directive (EU) .../... [recast EED].. The Commission shall issue guidance on how to implement and verify the***		cooling **systems *or waste heat,*** it is technically not feasible to ***fully comply with*** the requirements under the first paragraph, ***the remaining share or all of the*** total annual primary energy use may also be covered by ~~**renewable** energy from the grid, documented with power purchase agreements and renewable heating and cooling purchase agreements as referred to in Directive (EU) 2018/2001 [amended RED], or~~ ***energy from an efficient district heating and cooling system in accordance with Article 24(1) of Directive (EU) .../... [recast EED].. The Commission shall issue guidance on how to implement and verify the those criteria with special attention to technical feasibility.***	reference to PPAs, especially in relation to the grid. This is in line with comments made to the definition of ZEB under Article 2 and the need to cover energy needs in the most efficient way possible.

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		those criteria with special attention to technical feasibility.			
	Annex IV - COMMON GENERAL FRAMEWORK FOR RATING THE SMART READINESS OF BUILDINGS				
8	[3] The methodology may further take into account: (a) the interoperability between systems (smart meters, building automation and control systems, built-in home appliances, self-regulating devices for the regulation of indoor air temperature within the building and indoor air quality sensors and ventilations); and	[3] The methodology may further take into account: (a) the interoperability between systems (smart meters, building automation and control systems, built-in home appliances, self-regulating devices for the regulation of indoor air temperature within the building and indoor air quality sensors and ventilations); and	[3] The methodology may further take into account: ***(d)*** the interoperability between systems (smart meters, building automation and control systems, built-in home appliances, self-regulating devices for the regulation of indoor air temperature within the building and indoor air quality sensors and ventilations); and	[3] The methodology may further take into account: (d) the interoperability between systems **and Network Operators Systems** (smart meters, building automation and control systems, built-in home appliances, self-regulating devices for the regulation of indoor air temperature within the building and indoor air quality sensors and ventilations); and (e) the positive influence of existing communication networks, in particular the existence of high-speed-ready in-building physical infrastructure, such as the voluntary 'broadband ready' label, and the existence of	E.DSO welcomes the preservation of the obligation to include 'flexibility of building's overall electricity demand in relation to the grid' as a key functionality in the methodology used to define smart readiness. However, the methodology for assessing smart readiness of buildings should also consider the **interoperability between the buildings and network system.** Therefore, we suggest the integration of

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	(b) the positive influence of existing communication networks, in particular the existence of high-speed-ready in-building physical infrastructure, such as the voluntary 'broadband ready' label, and the existence of an access point for multi-dwelling buildings, in accordance with Article 8 of Directive 2014/61/EU of the European Parliament and of the Council.	(b) the positive influence of existing communication networks, in particular the existence of high-speed-ready in-building physical infrastructure, such as the voluntary 'broadband ready' label, and the existence of an access point for multi-dwelling buildings, in accordance with Article 8 of Directive 2014/61/EU of the European Parliament and of the Council	***(e)*** the positive influence of existing communication networks, in particular the existence of high-speed-ready in-building physical infrastructure, such as the voluntary 'broadband ready' label, and the existence of an access point for multi-dwelling buildings, in accordance with Article 8 of Directive 2014/61/EU of the European Parliament and of the Council	an access point for multi-dwelling buildings, in accordance with Article 8 of Directive 2014/61/EU of the European Parliament and of the Council	'Network Operators System' in Annex IV, Point 3 (d).