



IEA Technology Collaboration Programme

Legislation and Regulation as Enabler for Flexible Energy Storage in Building Masses

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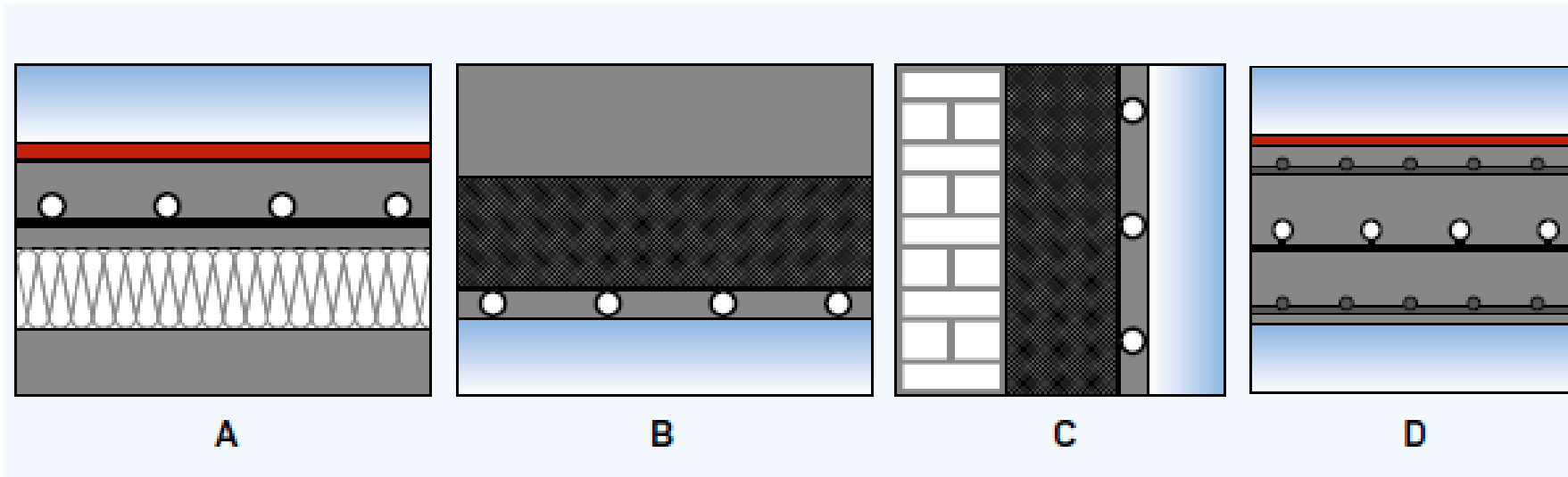
Prof. Shady Attia



35th ES On-Seminar - 16 October 2025 (09:30–11:00 CET)

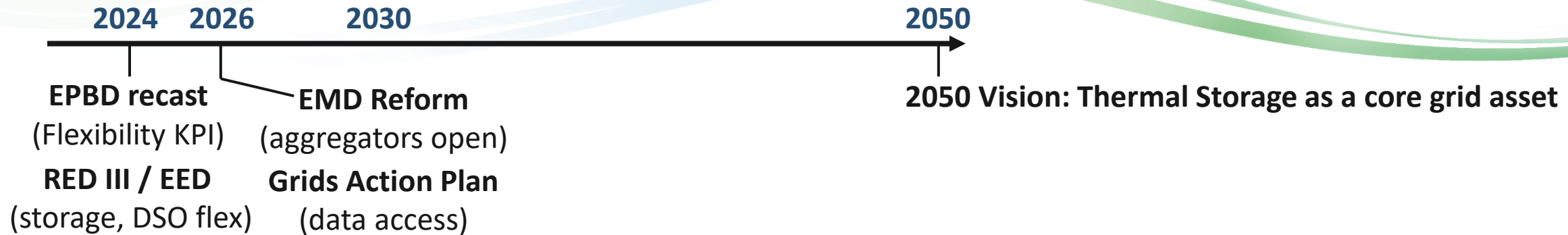
From Buildings to Flexibility Assets

- Thermal activation works technically. The question is: *will Europe's rules, markets, and policies allow it to scale?*
- Task 43 interviews in four countries—Germany, Denmark, Belgium, and Spain—and how upcoming EU reforms could finally unlock building-mass flexibility.



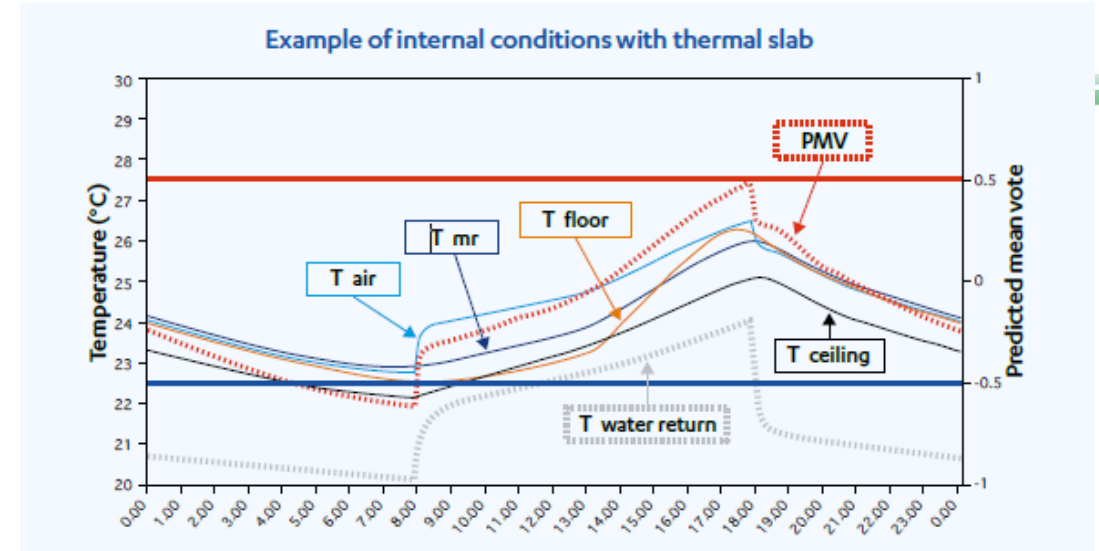
Examples of water-based embedded radiant systems: a) floor, b) ceiling, c) wall and d) TABS. Credit: Bjarne W. Olesen

EU Energy and Building Policy Landscape (2025-2030-2050)



Policy	Key Date	Why it matters for TABS
EPBD Recast (1275)	In force 2024 → transpose by 2026	Add <i>thermal-storage flexibility KPI</i> to EPC/EPB; optional SRI credits.
EED (2023/1791)	2023 → 2030 targets –11.7 % energy	Allows counting demand-side flexibility in national energy plans.
RED III (2023/2413)	2023 → 2030	Calls for storage/aggregation integration at the Distribution System Operator level.
EMD Reform (1711& 1747)	July 2024 → apply 2025	Opens markets to aggregators & demand-response assets.
EU Grids Action Plan	2023 → 2030	Prioritises digitalisation + data access = core for TABS control.

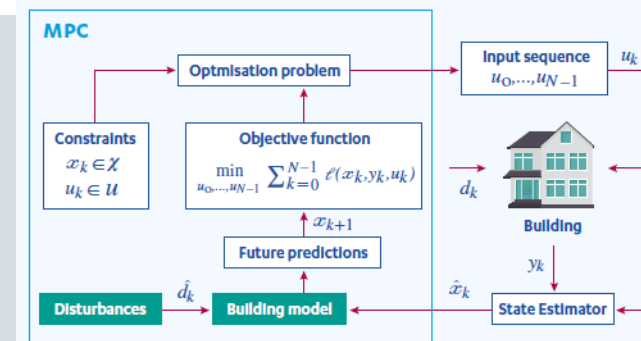
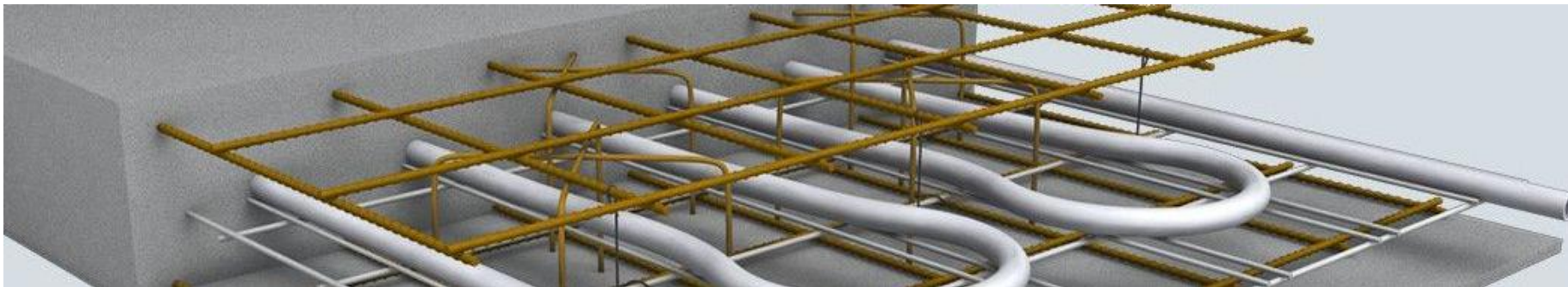
Europe Enters the 15-Minute Market



- From hourly to 15-minute Day-Ahead clearing (SDAC) by Sep 30, 2025.
- Smart-meter data = 15-minute resolution across the EU.
- Dynamic tariffs emerging:
 - BE Flanders capacity tariff (peak 15 min)
 - ES time-of-use 3 tiers
 - DK hourly real-time
- New revenue layers: DA arbitrage + peak-charge avoidance + local DSO services.

Flexibility Strategies for TABS in the 15-Minute World

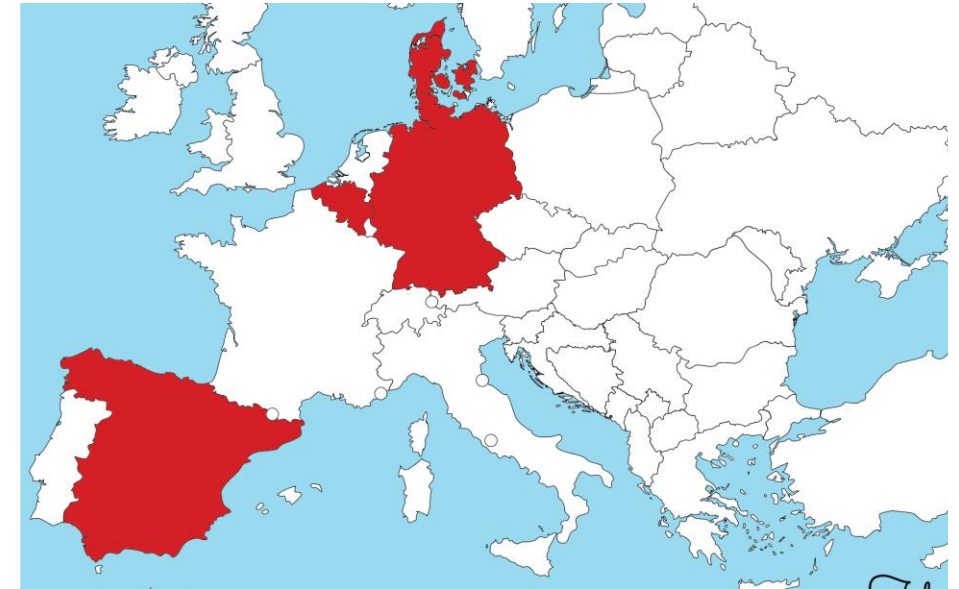
- **Model-Predictive Control (MPC):** generate 96-point schedule D-1.
- **Two objectives:** minimise cost & monthly peak (15-min billing).
- **Stacked revenues:**
 - Day-Ahead arbitrage,
 - Peak-charge avoidance,
 - Local DSO flex markets (RED III)
- **Portfolio aggregation:** pool many stable buildings = firm flexibility.
- **Digital enablers:** 15-min data + open APIs (EN ISO 52120).



Evidence from Task 43 Subtask C Interviews

26+ interviews from 4 countries.

Country	Awareness	Market readiness	Optimism
DK	5	4	4
DE	4	3	3
BE	4	3	4
ES	3	1	2



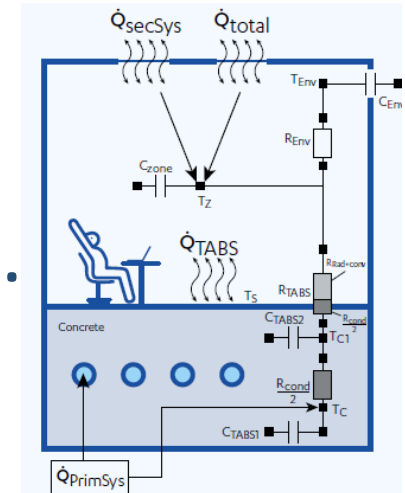
- **Expert Voices**
- “People think TABS are slow—no, they are stable.” – *Bjarne Olesen*
- “There are no active barriers, only missing incentives.” – *Andrés Valverde Peña. (Spain)*
- “Architects reject what they never tried.” – *Lieve Helsen*
- “Mass is storage, not just structure.” – *Xzing Xue*

EU-Wide Barriers and Policy Pathways

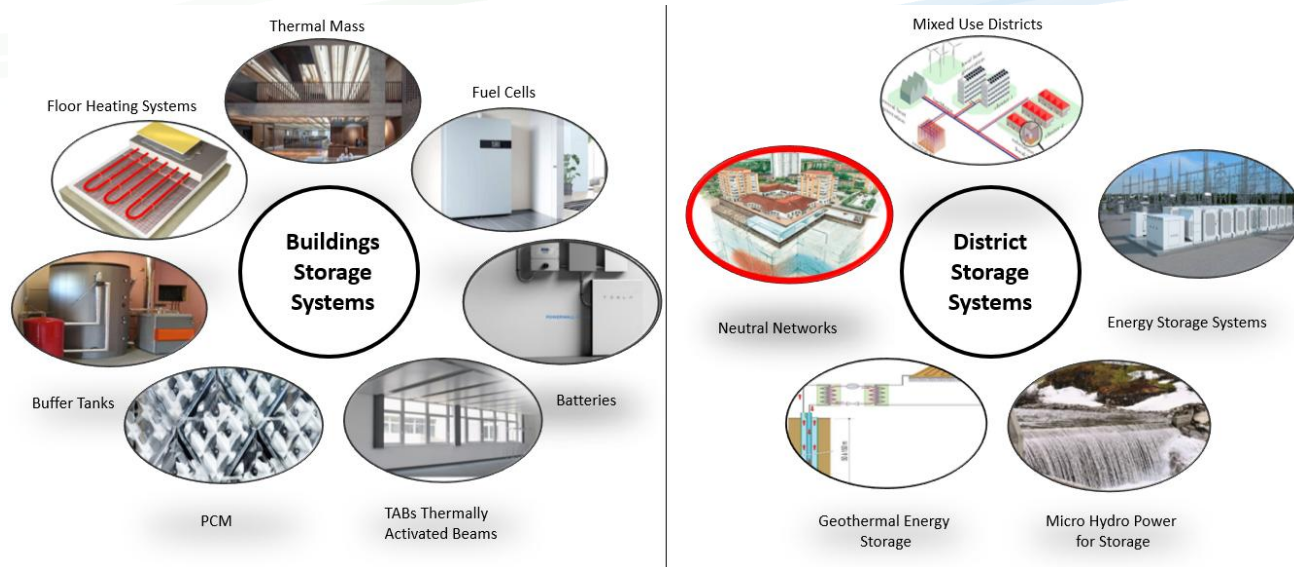
Barrier Type	Core Issue	Policy Lever
Regulatory invisibility	EPC & EPB ignore dynamic thermal storage	① Add Flex-KPI in EPBD Annex I
Market access	< 1 MW threshold excludes buildings	② Implement aggregator access under EMD
Skills gap	Few trained engineers for MPC/TABS	③ EU Pact for Skills modules
Awareness & demonstration	Policy makers see no data	④ Label “Flex-Ready Buildings” (Horizon EU 2026)

To unlock flexibility, four levers matter:

- First, regulatory recognition—put flexibility KPIs in the EPBD.
- Second, market access—open aggregators to sub-100 kW assets.
- Third, skills—train architects and facility managers in predictive control.
- And fourth, demonstration—EU programmes should fund *Flex-Ready Buildings* as visibly as they fund PV roofs.



Looking Ahead: 2030 → 2050



Thermal storage, the hidden engine of carbon neutrality.

- By 2030 → TABS & other thermal storage provide > 10 GW flexibility potential in Europe (≈ 15 % of building-sector load).
- By 2050 → climate-neutral EU = fully electrified heat + intermittent RES → buildings must serve as flexibility sponges.
- Risk: timber/lightweight construction reduces thermal mass.
- Strategy: hybrid cores, PCM ceilings, concrete modules as structural storage.

Closing Message: Aligning Technology, Market, and Policy

- **Empirical validation:** Task 43 results demonstrate that **TABS can shift 4–6 kWh/m² · day** with minimal comfort deviation ($\Delta T < 0.5$ K) when operated under predictive control.
- **Grid & system potential:** Across the EU, activating thermal mass in tertiary and residential buildings **could supply $\approx 10\text{--}12$ GW of short-term flexibility**; equivalent to a large pumped-hydro plant fleet.
- **Market alignment:** The new 15-minute Day-Ahead market (ACER, 2024) and aggregator access under the Electricity Market Design reform (2024/1711 & 1747) now **create real economic signals for demand-side flexibility**.
- **Regulatory inertia:** Current EPBD/EPC methodologies remain quasi-static, excluding dynamic storage behaviour; thus, **no regulatory or financial credit is given for thermal-mass flexibility**.
- **Strategic policy path:** Incorporate **thermal-storage indicators** in EPBD Annex I and the Smart Readiness Indicator, **lower aggregator thresholds (< 100 kW)**, and **launch EU programs for “Flex-Ready Buildings.”**



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The Energy Storage TCP

Looking forward to the discussion.

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