

75inQ Public Comment:

Data centres in Europe – minimum performance standards

Introduction

75inQ welcomes the Commission's initiative in establishing minimum standards of efficiency when it comes to data centers' energy consumption. The rise in energy consumption from data centers has interactions with the EU commitments to energy efficiency and affordability of energy. In terms of distributional effects, this phenomenon can affect the most vulnerable energy consumers. 75inQ supports this initiative but finds that the proposed policy options do not cover all the issues caused by the increase in data center energy consumption. The following comment details the mechanisms making this initiative most necessary, and the suggestions section proposes targeted measures to mitigate those.

Comments

On energy affordability

Data center efficiency must be encouraged in order to ensure energy affordability for energy-poor consumers in the EU.

Data centers' servers, storage, network and cooling systems' consumption represented 1.5% of global electricity consumption in 2024, and that consumption has been following a steep curve of 12% growth per year over the last five years.¹ In order to fill such energy needs, companies operating data centers contract Power Purchase

¹ IEA (2025), Energy and AI, IEA, Paris <https://www.iea.org/reports/energy-and-ai>, (p.13) Licence: CC BY 4.0

Agreements (PPAs), and represent currently 30% of the total 120GW of the renewable energy that is being procured through PPAs, globally.² This may have the consequence of raising the price of renewable energy for all other activities. Locally, this causal effect has been proven in one European Union context. In Ireland, households have paid €715 million extra in energy costs due to the now known data center price effect.³ In terms of forecast, the average Irish household could expect to pay a further approximated €295 (low demand scenario), €461 (median demand scenario), and €644 (high demand scenario) cumulatively in the 10 year period 2025-2034. For all households combined, this scales to €633 million, €991 million, and €1.43 billion respectively for these demand scenarios.⁴ This effect comes both from the scarcity of clean energy in certain areas but also from the created need for grid reinforcement, additional generation capacity to fulfill this demand increase.

In Europe however, a compound annual growth rate (CAGR) of between 8% and 13% is expected for data centers in the period from 2026 to 2030.⁵ The data center price effect is only set to expand therefore.

Simultaneously, energy poverty remains high in Europe where over 15% of Greek, Lithuanian, Bulgarian, Spanish and Portuguese households are unable to keep their home warm.⁶ Energy poverty itself affects demographics differently. Women and women-led households are more likely to be in situations of energy poverty.⁷ In parallel, women-led households in situations of energy poverty spend a higher share of their

² IEA (2025), Energy and AI, IEA, Paris <https://www.iea.org/reports/energy-and-ai>, (p.77) Licence: CC BY 4.0

³ Fearon, S. (2026). *The cost of data centres: Modelling the household electricity costs of Ireland's data centre sector*. Friends of the Earth Ireland & Beyond Fossil Fuels. (p. 14)
<https://www.friendsoftheearth.ie/publications/the-cost-of-data-centre-growth-in-ireland/>

⁴ Fearon, S. (2026). *The cost of data centres: Modelling the household electricity costs of Ireland's data centre sector*. Friends of the Earth Ireland & Beyond Fossil Fuels. (p. 20)
<https://www.friendsoftheearth.ie/publications/the-cost-of-data-centre-growth-in-ireland/>

⁵ Europe Data Center Market Report (Q1 2026). (2026). Retrieved from <https://www.blackridgeresearch.com/reports/europe-data-center-market-size>; Intelligence, Mordor Intelligence. (2026, January 22). Europe Data Center Market Size, Share & 2031 Growth Trends Report. Retrieved from <https://www.mordorintelligence.com/industry-reports/europe-data-center-market>

⁶ Eurostat. (2025). Inability to keep home adequately warm by NUTS 2 region [Base de données]. Dans *Publications Office of the European Union*. https://doi.org/10.2908/ilc_mdcs01_r

⁷ Habersbrunner, K., Noreña Ospina, M., Wieser, P., Kuschan, M., & Reichmann, F. (2024). *Study on gender-disaggregated data on Energy Poverty Final Study Report* Katharina Habersbrunner, Marcela Noreña Ospina, Pia Wieser, Marika Kuschan, Franziska Reichmann. European Economic and Social Committee.

revenues on energy.⁸ An increase in energy prices causes them to be affected further than their male counterparts both financially and physiologically as they are more exposed to heat and cold stress.⁹ Further, female-led households constitute the majority of monoparental households as well as the majority of households with dependent relatives.¹⁰ In energy price shocks, energy-poor households' energy demand cannot adjust any further as it is already kept at a minimum. Studies show that then, the spending post that is reduced first to adjust for the new expense is that of food.¹¹ In such a sense, allowing increases in energy prices caused by data centers would both affect this vulnerable consumer group of energy-poor female led households but also the even further vulnerable group of children and dependent relatives. In light of these facts, it is not reasonable in the current European situation with regards to energy poverty, to allow for data centers' energy consumption to inflate citizens' energy bills.

On energy efficiency targets

A second ground for implementing data center efficiency standards is that of the energy efficiency targets of the European Union. The EU has committed to a 11.7% final energy use reduction target by 2030.¹² Data centers are notoriously large consumers of energy as explained above. With the aforementioned forecasted growth of AI data centers in Europe, and growth of AI energy demand, these targets will be harder to reach.

Trying to reach the energy efficiency targets without tackling the issue of the growing energy consumption from data centers necessarily means demanding of other sectors to decrease their energy consumption in order to offset this expected growth. One of

⁸ Dr. Feenstra, M. (2025) Reframing Energy Poverty through a Gender Lens

⁹ Dr. Feenstra, M. (2025) Reframing Energy Poverty through a Gender Lens

¹⁰ Rallu, J. L. (2017). *Estimating numbers and poverty status of female household and family heads*. *Revista de Historiografía*, 26. <https://e-revistas.uc3m.es/index.php/REVHISTO/article/download/3708/2314/>

¹¹ Varal, S., & Reaños, M. A. T. (2026). Energy price shocks in Europe and its impacts on vulnerable households : A demand system approach. *Energy Economics*, 160,(p.9). <https://doi.org/10.1016/j.eneco.2026.109429>

¹² Directive - 2023/1791 - EN - EUR-LEX. (n.d.). Retrieved from https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=OJ%3AJOL_2023_231_R_0001&qid=169518659876

the sectors that has already been mobilised in order to reduce the final energy consumption in Europe by 2030 is that of residential housing.¹³

Home retrofitting plans and energy efficiency plans for households are already putting significant strain on energy poor households. Just as for the last argument, when demanding that households restrain their energy use and renovate their dwellings, one is also asking energy poor households to do so. Energy poor households tend to live in poorer quality housing due to their financial situation, they also tend to have less funds to advance for renovation.¹⁴ Further, they are less likely to own their home and thus to be empowered to operate such renovations. and are the least likely to be able to cut their consumption without significantly affecting their quality of life as they already can only qualify as energy poor if they are unable to efficiently heat their home. On top of that and as explained earlier energy poverty is overrepresented within women,¹⁵ and the household members of women-led households are more likely to be further vulnerable to the lack of energy services as they are more likely to be children, infants and dependent relatives.¹⁶

In such a sense, it is imperative to make data centers responsible for their energy consumption reduction in order to meet the targets without asking further efforts from households that are in already tense positions.

Suggestions

In such a setting, 75inQ suggests that the following course of action be followed to mitigate the distributional effects of data centres' energy inefficiency.

¹³ EU homes, key to the 2030 energy efficiency goals | BUILD UP. (2025, September 30). Retrieved from <https://build-up.ec.europa.eu/en/resources-and-tools/publications/eu-homes-key-2030-energy-efficiency-goals>

¹⁴ Mei, X., & Seo, B. K. (2024). The relationships among housing, energy poverty, and health : A scoping review. *Energy Sustainable Development/Energy For Sustainable Development*, (p.4). <https://doi.org/10.1016/j.esd.2024.101568>

¹⁵ Alonso-Epelde, E., Thomson, H., & García-Muros, X. (2026). A widespread Energy Poverty Gender Gap in the European Union demands targeted policy action. *Communications Sustainability*, 1(1), (p.6). <https://doi.org/10.1038/s44458-026-00044-8>

¹⁶ Rallu, J. L. (2017). *Estimating numbers and poverty status of female household and family heads*. *Revista de Historiografía*, 26. <https://e-revistas.uc3m.es/index.php/REVHISTO/article/download/3708/2314/>

On data centers and energy affordability

1. Introduce binding minimum energy-performance standards for data centres.
 - a. By including limits on energy use and requirements for efficient cooling, servers and other infrastructure.
 - b. By making compliance a condition for the construction or expansion of existing data centres.
2. Require large data centres to bear the full system costs created by their electricity demand.
 - a. By requiring large data centres to contribute to the costs of grid reinforcement, additional generation capacity and other infrastructure investments attributable to their demand.

On data centres and the EU energy-efficiency target

1. Establish a dedicated data-centre energy-efficiency contribution toward the EU 2030 target.
 - a. By establishing a data-centre electricity consumption and efficiency improvements indicator in NECPs
2. Make efficiency assessments mandatory in the permitting for new data centers
 - a. By demanding for detailed assessments of the facility's energy efficiency before its construction
 - b. By having such assessments reviewed by independent third parties in relation to the 2030 target

About 75InQ:

The 75inQ foundation works to accelerate the transition to sustainable energy by promoting gender equality in line with the Sustainable Development Goals developed by the United Nations. The Dutch foundation conducts research, awareness campaigns, community outreach and facilitation to pursue these objectives. 75inQ focuses on SDG7 and SDG5 by accelerating diversity in the energy sector towards a more inclusive and sustainable energy transition. 75inQ has an active community of 1400 female professionals in the energy sector.