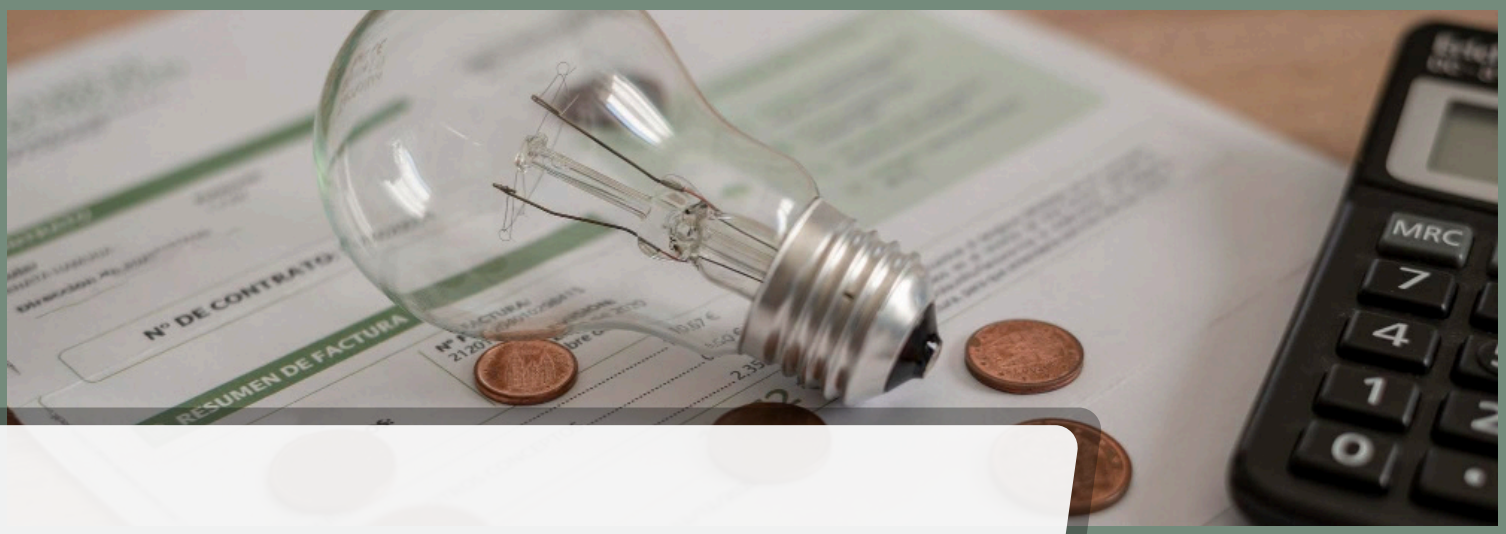
SUPPORT FOR THOSE WHO CAN APPLY?

BARRIERS TO ACCESS TO ENERGY SUBSIDIES

08 **ENERGY CIRCULARS**

WITH THE SUPPORT OF THE HEINRICH BÖLL STIFTUNG (HBS)



SUMMARY

SEPTEMBER 25, 2026

A family may meet the social conditions for support and still not benefit. It may not complete the application, not provide a document or not have the money to start the investment that is subsidized later. For this reason, the number of applications and grants awarded is not enough to assess the fairness of an energy scheme.

This circular examines the path between family need and receipt of support. The main focus is on co-financing, post-work reimbursement, documentation and electronic application. The analysis uses the published criteria of a FKEE call and the draft program for the 2026–2027 bills. These instruments have different purposes and procedures and are not treated as a single scheme.

INDEP recommends that families with insufficient income be offered support that also covers the pre-financing barrier. Assistance with the application should continue until the decision and payment, while reporting should show at what stage applicants are lost. This requires data on unfinished files, withdrawals after approval and the reasons given by the families themselves.

Note on sources. Sources reviewed up to September 22, 2026. Financial examples are illustrative calculations by INDEP on published rules; they do not represent households surveyed. The 2024 call is used as an analytical case and is not presented as an open call in 2026.

TWO TYPES OF SUPPORT WITH DIFFERENT OBSTACLES

The bill subsidy reduces the household's obligation to the supplier. The renovation grant finances an intervention that should reduce the energy needs of the home. Benefiting from one instrument does not guarantee access to the other. A household may be identified as vulnerable in the bill program, but may not have savings, documentation or decision-making rights to renovate the property in which they live.

The FKEE call opened on August 27, 2024 offered support for up to 45 percent of the investment, or 50 percent in cases of women's ownership or co-ownership of the couple, with a ceiling of 5,500 euros. Reimbursement was foreseen after the completion of the works. This is a co-financing instrument, the social value of which also depends on the ability of the family to cover its share and to finance the work until disbursement. [1] For the bill subsidy, the 2026–2027 draft provides for electronic application and assistance from CSWs. Therefore, the question is not whether there is a help channel in the text, but whether it enables the application to be completed on time. An office that only provides instructions, without helping the family to resolve errors or missing documents, may not overcome the real obstacle. [2]

Table 1 Obstacle and instrument to be addressed

Obstacles	Bill subsidy	Renovation grant
Lack of advance money	Mainly waiting until the credit is credited and covering the unsupported portion.	Personal contribution and financing of works before reimbursement.
Incomplete documents	Income, family composition, rent and connection to the point of consumption.	Property rights, intervention permits and technical documentation.
Difficulty in application	Access to the platform, accuracy in records and decision tracking.	Application, audit, selection of works and request for payment.
Expected result	Bill relief within the support period.	Improving the apartment and reducing the need for energy.

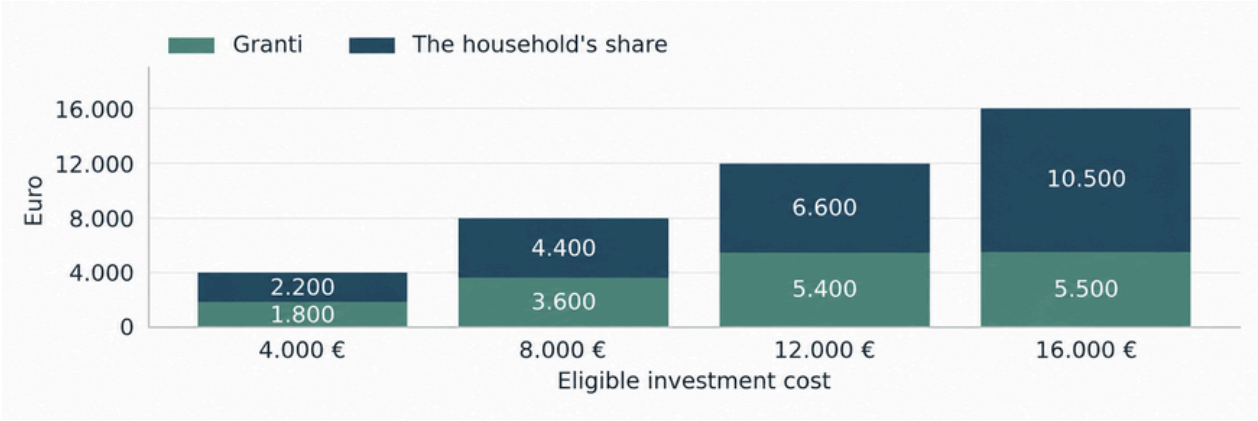
Differences in the table require special procedures. Assistance with the form can resolve an administrative obstacle; for the lack of financial contribution, the method of financing must be changed.

THE PART THAT REMAINS FOR THE HOUSEHOLD

For an eligible investment of €10,000, the 45 percent rate produces a grant of €4,500 and a final cost of €5,500 for the family. The 50 percent rate reduces this cost to €5,000. The reduction is valuable, but neither amount is affordable just because the rest is subsidized. The social assessment should consider whether the family can pay the contribution without postponing the need for food, medicine, or other basic expenses.

The grant ceiling also changes the effective percentage of support. At a rate of 45 percent, the ceiling of 5,500 euros is reached with an investment of around 12,222 euros. Above that value, the grant remains the same and the additional cost remains with the family. The selection of measures and the grant limit should, therefore, be linked to real need and ability to pay.

Chart 1 How the cost is divided according to the 45 percent rule and the 5,500 euro ceiling



INDEP illustrative calculations on the 2024 FKEE call. It is assumed that the entire cost presented is eligible and that other conditions are met. Interest or extra-scheme expenses are not included.

Table 2 Calculation of grant and contribution

Investing	Grants	Household's share	Effective support
4.000 €	1.800 €	2.200 €	45,0%
8.000 €	3.600 €	4.400 €	45,0%
12.000 €	5.400 €	6.600 €	45,0%
16.000 €	5.500 €	10.500 €	34,4%

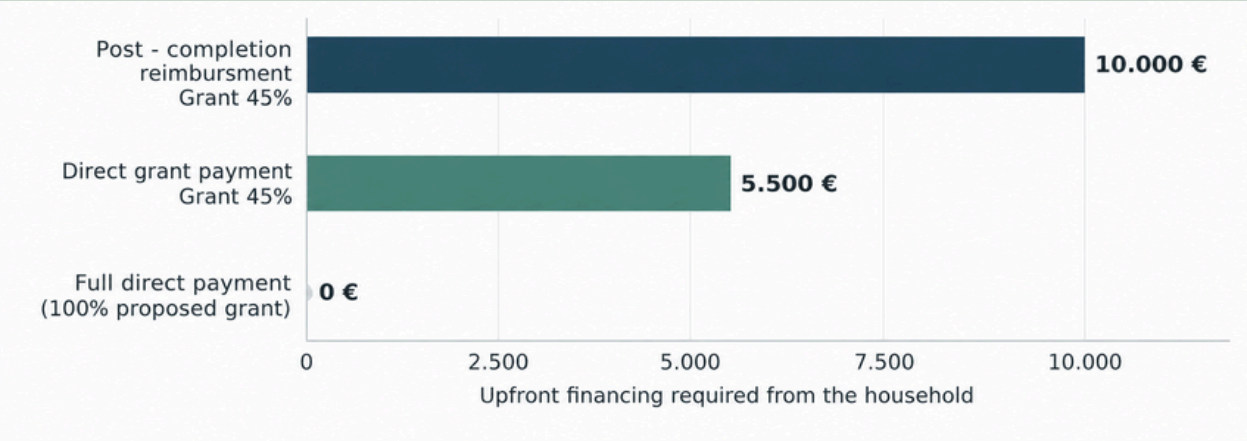
The source of the rule is the historical call of the FKEE; the amounts are estimates, not disbursement results. [1]

For very low-income families, a small increase in the percentage of the grant may not be enough. The alternative is a special instrument with minimal or zero contribution, linked to social and technical assessment, within a defined budget. It does not need to replace co-financing for families who can afford it.

REIMBURSEMENT LEAVES OPEN THE PROBLEM OF PRE-FINANCING

The final cost and the amount that must be secured before the grant payment are two different amounts. When the family pays for all the work before reimbursement, for an investment of 10,000 euros they must find 10,000 euros, although in the end they may have 5,500 euros left to cover it. Without savings, credit or a deferral agreement with the contractor, an approval letter does not enable the work to start.
The importance of this issue is also evident in the disbursement documents. The final notification of the FKEE for a previous call required bills in the name of the beneficiary and proof of bank payments. To measure the impact of this requirement on access, it is necessary to record the families that withdraw after approval and the reasons for withdrawal. [3]

Chart 2 Financing that the family must provide for the same investment



Illustrative scenarios for a 10,000 euro investment. In both cases with a 45 percent rate, the grant is 4,500 euro. The direct payment presented assumes that the family pays only its share; full coverage is a proposed model, not an actual offer.

Paying the grant directly to the contractor can reduce the need for transitional financing, but it does not eliminate the personal contribution. For a family that cannot even pay 5,500 euros, changing the recipient of the payment is insufficient. Therefore, the level of support according to social status should first be determined and then the method of payment.
Pre-financing should be accompanied by technical control, payment in stages and contractual liability for deficiencies. The family should receive information about the approved work, the price and the procedure for appealing.
Transferring the financial burden to the public scheme should not leave the family without protection against poor workmanship.

DOCUMENTS AND PROCEDURES THAT INTERRUPT THE APPLICATION

The request for documents has a reasonable purpose: to verify the benefit and protect public money. However, the request must be related to the risk it seeks to control. For a bill subsidy, the identification of the person living in the apartment and paying the energy is not the same as proof of ownership. For the insulation of the building, the right of intervention and the consent of the owner are issues that must be resolved separately.
Electronic verification can reduce the burden on the family when the state itself receives the data it possesses. But an error in the registry can become an automatic obstacle if the applicant is unable to correct it. We recommend that the case of inaccuracy be given the status of completion or verification, with clear instructions and a deadline. Cases with indications of false declaration should be handled according to the relevant procedure, without equating every technical discrepancy with abuse.

Table 3 How to follow the approach to benefit

Indicator	Proposed definition	Use
Application completion	**Applications submitted versus unique cases that have initiated the process.**	**Identifies difficulties before review.**
Files for completion	**Cases requiring additional documents, separated by document.**	**It shows which requests produce burden.**
Withdrawals after approval	**Beneficiaries who do not continue, with the stated reason.**	**Distinguishes the financial problem from the technical one.**
Disbursement time	**Days from complete and valid request to payment.**	**Measure the wait after the work is finished.**

These indicators should be disaggregated by economic status, municipality and housing status, where data are legally available. Statistics should be published in aggregate form. They should not be interpreted as a rate of coverage of all households in need, as the denominator for this calculation requires broader identification.

A SPECIAL PATH FOR HOUSEHOLDS WITHOUT CO-FINANCING OPPORTUNITIES

Kosovo has a useful experience in developing this approach. In the initiative of the FKEE and UNDP, potential families were identified from the social assistance list and verified in the field with CSWs. This brings the program closer to the family, rather than leaving the entire burden of initiating the process to them. [4] A national instrument could use this experience, but there should also be a referral route for families outside the social assistance list. Status on another scheme facilitates identification; absence from that list should not be the only reason to close the screening. Families with sudden changes in income, renters, and people with additional necessary expenses require a documented assessment.

Table 4 Financing models according to ability to pay

Family situation	Proposed support	Use
Application completion	Applications submitted versus unique cases that have initiated the process.	Identifies difficulties before review.
Files for completion	Cases requiring additional documents, separated by document.	It shows which requests produce burden.
Withdrawals after approval	Beneficiaries who do not continue, with the stated reason.	Distinguishes the financial problem from the technical one.
Disbursement time	Days from complete and valid request to payment.	Measure the wait after the work is finished.

This division is a proposal for the design of the scheme. The rates and ceilings should be derived from the budget, the cost of the measures and the assessment of the families, not from a percentage chosen without analysis. Full support should be limited to necessary and acceptable work, with controllable prices and with a ban on double financing.

For buildings with structural problems, energy intervention should be linked to safety assessments and housing programs. The family should be explained why a measure cannot be implemented and which institution will take the case further. A technical refusal without referral can leave the family in the worst conditions out of support.

This model requires capacity for social assessment, assistance and case follow-up. The administrative cost should be budgeted and measured. The assessment should compare it with the ability to reach families that the standard scheme does not reach and with the sustainable benefit from the intervention.

CHANGES TO BE MADE IN THE NEXT CALL

The FKEE and the responsible ministries should include an analysis of the approach in the design of each new call. The program document should indicate which group is targeted, what amount the household is expected to pay and at what stage. When a measure is presented as support against energy poverty, it should be argued why the financial conditions can be afforded by the targeted households.
First, create a special part of the budget for families without co-financing opportunities. Determine how they are identified and how the payment for the works is covered. The number of potential beneficiaries should be calculated together with audit, supervision and administration costs, without presenting only the cost of materials as the full cost of the program.
Secondly, assistance should cover the entire procedure. Municipalities and CSWs should be able to help with the verification of social status and the application, while the technical institution should clarify the measures, documents and payments. The beneficiary should know who to contact at each stage and who is responsible for the response.
Third, the approval of the grant should be accompanied by a clear deadline and disbursement conditions. The rule for completing the file and for a justified extension of the deadline should be published in advance. The institution's delay should not add a financial burden to the family that it could not have foreseen.
Fourth, after the call is closed, an analysis of the cases that did not complete the process should be published. This assessment should also include a selected number of unfinished cases, with consent and data protection. The applicant's response to the reason for withdrawal should be distinguished from the institution's administrative conclusion.

Table 5 Proposed timelines for the review of the approach

Where	Action	Responsibility
Before the call	**Testing the application and financing with different family cases.**	**The institution that designs the scheme, ASHI when the platform is included, CSWs.**
During implementation	**Reporting blocked files and correcting recurring obstacles.**	**Implementing institution and municipalities.**
Within 90 days of closing	**Analysis of withdrawals, disbursements and reasons for non-completion.**	**Implementing institution; publication of aggregated results.**

A scheme is accessible when the family in need can complete the procedure and receive the benefit. The assessment of success should be based on this result. Opening the form and spending the budget are important administrative steps, but they do not provide this answer by themselves.

SOURCES AND BASIS OF CALCULATIONS

For chart 1, the grant is calculated as the lesser of 45 percent of the eligible cost and 5,500 euros. The family share is the cost minus the grant; the effective support is the grant divided by the cost. Chart 2 assumes full payment of the works before reimbursement in the first scenario, direct payment of the grant in the second and full coverage in the third. No loans, interest or special agreements with the contractor are included.

1. Kosovo Energy Efficiency Fund. Opening of the call for individual houses, 27 August 2024. The rate of 45 percent, or 50 percent in specified cases, and the ceiling of 5,500 euros refer to this call. Original source
2. MoEFVLC, Working Group. Draft Program for Vulnerable Consumers 2026–2027, version published on 7 September 2026, especially sections 4.2, 4.3, 5 and 6. Still under consultation at the date of analysis. Original source in albanian
3. Kosovo Energy Efficiency Fund. Final announcement, disbursement documentation for the call for individual houses and deadline 31 July 2024. Original source
4. Kosovo Energy Efficiency Fund. Green and Just Transition for Kosovo, Household Selection and Field Verification, September 26, 2025. Original source

Abbreviations: Ministry of Labor, Family and Liberation War Values; KEF: Kosovo Energy Efficiency Fund; ASHI: Information Society Agency; CSW: Social Work Center.

All sources were consulted on September 22, 2026. Recommendations and illustrative scenarios are INDEP analyses.
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