



Regulating Energy Efficiency in Data Centres: Experience from Germany

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Presenter's Note

This is an update to our presentation from the Concerted Action in March 2024.

For reference, please find that presentation here:

https://www.ca-eed.eu/ia-document/implementing-the-eed-data-centers-and-the-german-energy-efficiency-act-germany/





The Status Quo in Germany

Data Centres in Germany



Germany has second highest number of DCs worldwide,

- only US has more



Distribution by installed IT-Power

- More than 3.000 DCs > 40 kW
- Trend rising



Total energy consumption in 2024: 20 TWh/a

- Estimated rise to 30 TWh/a by 2030





image: flaticon.com

The Energy Efficiency Act (EnEfG) in Germany

- First legal framework to improve energy efficiency in GER across sectors (18th of November 2023)
- Implementing other requirements from EED, e. g. Art. 5 EED, Art 8 EED
- § 12 § 15 EnEfG regulate DCs
- Scope beyond current Art 12 EED, e.g.
 - efficiency-requirements, renewable energy and national reporting
 - data-points beyond EED-requirements





Energy efficiency requirements § 11 EnEfG

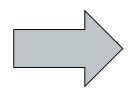
Starting operation:

before July 2026

PUE requirements:

PUE 1,5 from July 2027

PUE 1,3 from July 2030



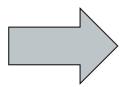
Starting of operation:

from July 2026

PUE requirement:

PUE 1,2

Waste heat usage: Not mandatory



Waste heat usage of at least (ERF):

10% from July 2026

15% from July 2027

20% from July 2028





Further requirements in EnEfG

- § 11: Renewable energy usage: 50% starting 2024 / 100% from 2027
- § 12: Energy management systems (EMS):
 - Implementation of EMS/UMS until July 2025;
 - certification necessary from 2026 for DCs > 1 MW
- §§ 13 and 14: Reporting obligation and national registry
- § 15 EnEfG: Operators of DCs must tell customers their individual energy consumption





Data points from and beyond the EED

- Annex VII EED and Annex 3 EnEfG include data points
- Examples:
 - Basic data: Name & adress of DC operator, starting date of operation, etc.
 - General specifications: floor area, installed power, etc.
 - Energy /performance data: energy consumption, renewable energy use, amount and temperature of waste heat, PuE value, non-redundand connected load etc.
- i.e. implementation of Delegated Act from Art. 33 Sec. 3 EED





Building a National Registry

The German Registry for Data Centers (RZReg)



- Operators of DCs are obliged to report specific data points to the national registry
- The German registry "RZReg" has been in operation since June 2024
 - second report DCs >500kW by March 2025
 - first wave of DCs >300kW ends in July 2025
 - Public Database Q3 2025





Challenge I – Building a Dataset

Assessment of Status Quo based on best-possible estimates of an incomplete dataset

- academic studies,
- professional associations (bitkom, GDA)

Challenge: Identification and inclusion of all DCs into the German reporting-scheme

How we tackle it:

- Legal Obligation
- Transparent Information
 - → Static: Website, Technical Guidance, FAQs
 - → Flexible: Webinars, Hotline





Challenge II – The Case of Co-Location Data Centres

Co-Location DCs around half of all DCs in Germany

Challenge: Gathering complete data from co-location DCs

- Hurdles are contractual and/or practical
 - → non-disclosure agreements between DCs and clients
 - > technical inability to measure certain data points

How we tackle it:

- legal obligation,
- advising data-sharing agreements between DC operators and clients





Summary

German DC registry in operation



- Growing dataset beyond the scope of the EED

- Challenge I – including an unknown total population

- Challenge II – gathering good data from Co-Locations



Public data accessible soon





Thank you for your attention.

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