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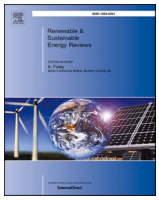

Reviewing the EU policy nexus of energy efficiency and social policy

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ABSTRACT

This paper aims to analyse how the European Union (EU) energy policy has merged social policy concepts with energy efficiency policy. Energy efficiency has increasingly become understood through social policy concepts such as energy poverty, energy inequality, and lack of cohesion. Previous research has shown how the social aspects of energy efficiency have been highlighted by the European Commission when talking about the multiple benefits of energy efficiency increasing efforts, such as renovating buildings. Using a mixed-method approach with material from the European Commission, the Council of the European Union and the European Parliament we review energy policy from a social policy perspective. Our analysis is done in two steps: (i) identifying which of the EU institutions acted as an agenda-setter introducing the social aspects of energy efficiency, and (ii) describing and analysing the framing process of merging social concepts with energy policy. We do this through qualitative and quantitative analysis of EU policy documents. A range of key words are utilized to explore the links between social policy and energy policy as part of the quantitative part of the analysis. We conclude that social aspects are first connected to the energy policy field by the European Parliament. The established connection is then reinforced by the Commission by the inclusion of social policy aspects, mainly in the policy on the transition to energy efficiency and zero-carbon buildings, where concepts such as energy poverty become central.

1. Introduction

The European Commission introduced the European Green Deal (EGD) to make Europe the first climate-neutral continent [1]. An important part of achieving net-zero greenhouse gas (GHG) emissions by 2050 is that the transition is just [2–4]. Within the EGD there is a social justice lens that pushes the idea that 'no person or place" should be left behind. The goal is two-fold – a transition of European energy systems and a promotion of new 'green' economic growth and dealing with distributional challenges from decarbonization [5]. The EGD roadmap includes 47 'key actions' consisting of a mix of 'hard' legal and 'soft' actions [1].

The social policy aspect becomes increasingly important for people and companies that will lose out due to the transition and the Commission also need find a balance to gain support for all 'hard' measures that involve changes in legislation. For instance, the €750-billion recovery plan launched in 2020, where a quarter was intended for investments in line with EGD, i.e. renovation of buildings, renewables, and other low-carbon technologies, sustainable mobility, and a just transition [5]. Energy efficiency has been conceptualized by the European Commission as a way of lowering emission while limiting the harmful impact of the transition [6], still there has been little research unpacking how the social aspects of energy efficiency policy within the green deal has been developed and what this means for understanding the development of EU social policy more generally. Within adopted legislation in the policy domain of energy efficiency of buildings in particular, the social dimensions have been highlighted when framing the benefits of the policy in recent years [6]. It is however unclear how energy and social policy has been merged.

As part of EU social policy, there have been attempts to coordinate or

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even harmonize member states' social security systems through EU directives but there are many challenges in attempting to integrate highly contrasting social systems [7]. The social standards, as agreed upon in the European Pillar of Social Rights (EPSR) agreement, lack details and are a far cry from the high standards of the wealthier member states [8]. Daly [9] argues in her research that the EU has indicated through the Lisbon Agenda and Europe 2020 initiative that EU's social inclusion policy has become noteworthy. This has led to an increase activity in EU social policy with a particular focus on social investment approach and its key values of growth efficiency [10] The role of social policy in EU has been growing in importance through new directives, recommendations and other instruments [11].

The Social Pillar have by some been argued to constitute a new phase in EU social policy [12] when it creates a symbolic framework. The EU 'social acquis' [13] has brought with it legislative initiatives in the field of posting of workers, work–life balance and fair working conditions [14,15] as well as an overall 'upward convergence' of social rights among member states [13,14]. Kilpatrick [16] even defines the post-EPSR period as the 'Roaring Twenties for Social Europe' where the social dimension of EU policy has moved further than a traditional focus on health and safety, non-discrimination and cross-border mobility to include a wider range of issues, including minimum wages, minimum income, food aid and work–life balance. Keune et al. [17], p. 488) argues that "[t]here has been a diversification of the types of instruments used in the creation of social rights, with a significant return of hard legislation, via Directives and Regulations, the revamp of EU soft legislation, but also an increasing use of hybrid formulas, for example, the adoption of 'social conditionality' for accessing EU funds or 'social guarantees' in the area of youth and child policies", and how these "instruments create new roles for and relationships between the various governance levels".

The lack of clear-cut authority from the EU to dictate national social policy has inspired development of alternative policy tools such as the 'method of open-coordination' as a way to achieve to different levels of harmonization and/or convergence on social issues in a very heterogenous and diverse continent. The social open method of coordination (based on Articles 153(1) and 156 of the Treaty of the Functioning of the EU, TFEU (EU, 2012) had as a goal for member states to agree upon indicators and benchmarks aiming at upward social convergence [18–20]. One could see that EU also reconfigures existing power resources at the national level by providing a supranational layer of coordination and cooperation [21]. Increasing reporting requirements on member states have also increased the implementation powers of the Commission [22]. "From a neofunctionalist perspective, change is a function of spillover processes, encapsulating the hypothesis that 'the establishment of supranational institutions designed to deal with functionally specific tasks will set in motion economic, social and political processes which generate pressures towards further integration" ([23]:421–422). Despite the increasing involvement of the EU in social policy through 'competence creep' [24,25], legal competence in the domain is still formally retained by the individual member states. However, social policy aspects are present in other policy domains like energy. This spillover between, or linking of, policy fields is important both to understand EU policy processes and policymaking, but it also informs how social policy can be developed in other parallel fields of policy.

Within energy policy, social policy concepts such as energy inequality and energy poverty have been given more attention in the public debate [6]. Initially with the Clean Energy for All Europeans package [26], including proposals for amending the Energy Efficiency Directive (EED) and the Energy Performance of Buildings Directive (EPBD), and later since Russia's second war on the Ukraine which sparked an energy crisis following EU sanctions on Russia [27]. Additionally, it brings a new perspective to the studies of EU energy policy. Although promoting energy efficiency and decarbonization approaches (i.e phasing out fossil fuels from production of heat and power) are important to reduce GHG emissions from the building sectors, studies indicate that there is a risk of cost burdens and increased vulnerability for low-income households [28–30]. Official EU policy has recognized the burden a transition towards zero emission can put on particular groups in society. As part of the 2020 *Renovation Wave Strategy*, the Commission launched the *Affordable housing initiative*[1] (AHI) that social and affordable housing facilities also benefit from the renovation wave, guaranteeing that local social and affordable housing projects get access to necessary technical and innovation capacity and project support to become green and improve energy and resource efficiency. The *Social Climate* Fund (SCF)[2] aims specifically to prevent pushing more Europeans into energy poverty and transport poverty from increased energy prices due to the extension of EU ETS to buildings and transport, and to tackle already existing inequalities in the societies (Regulation (EU) 2023/955).

This highlights the important connection between the technical solutions and the social implications. The claimed benefits of EU policy on energy efficiency of buildings can be grouped in four categories: economic and industry policy aspects, environmental policy aspects, security policy aspects, and social policy aspects (cf. [31]). Energy efficiency has been framed in EU policy to achieve reduced energy bills; alleviating energy poverty and improve public health and hereby qualifying as social policy [6]. The primary rationale behind the social aspects of energy efficiency policies stems from the belief that improving energy efficiency will reduce household energy expenses, consequently reducing any negative implications such as energy poverty or energy inequality. Von Malmborg et al. [6] concludes that including additional benefits connected to social aspects within energy efficiency policy could be seen as either a Swiss knife that could solve multiple issues, or a trojan horse utilized to stealthily extend the competencies of EU into areas of national competencies such as social policy (cf. [25]).

This paper aims to describe how social policy aspects have been introduced in EU policy on energy efficiency and explain how the framing has developed in the discourse between the Commission, Parliament and the Council. An objective of the study is to analyse merged frame concepts used to connect the two policy domains. The ambition is to say something about both EU energy policy and social policy by investigating the interinstitutional discourse surrounding energy policy using the following methodological approach.

- Step 1:

The occurrence of key social policy terms within EU energy efficiency policy domain is examined to identify the development over time. The study identify merged frames of energy policy and social policy as the foundation of the study. Search words are then connected to these social policy – energy policy merged frames. The frequency of different terms shows the general development over time but is also used to identify pivotal policy documents which are analysed more deeply in step 2 of the analysis.

- Step 2:

Pivotal policy documents identified in step 1 is analysed in detail to explain how energy efficiency and social policy is connected by the different institutions involved in the legislative process. We are analysing the framing of energy and energy efficiency from a social policy perspective.

This article connects two existing fields of research, one focusing on EU social policy and one focusing on EU energy policy. In the next

[1] Affordable housing initiative. https://single-market-economy.ec.europa.eu/sectors/proximity-and-social-economy/social-economy-eu/affordable-housing-initiative_en (Accessed 3 June 2025).

[2] Social Climate Fund. https://climate.ec.europa.eu/eu-action/eu-emissions-trading-system-eu-ets/social-climate-fund_en (Accessed 3 June 2025).

section each of these fields are reviewed together with the already existing overlap. This is followed by a theoretical section identifying social policy concepts which is then utilized in the following section on research design. The results are then analysed, and the article concludes with a discussion on the implications of the development within EU energy and social policy.

2. Material and methods

Our methodological starting point is found within discursive studies of policies. Discourse analysis of policy seeks to understand how texts are structured and what social and political implications this will have [32]. Framing is a strategic activity that people use to justify and generate public support for policy ideas ([33], p. 11), and is a very suitable way to analyse and research wicked problems that could be considered complex. To analyse the social policy discourse within energy policy in the Commission, Parliament and the Council, a theoretical perspective on social policy aspects is required.

A discursive perspective becomes important as EU has no comprehensive budget and legitimacy for comprehensive redistributive welfare provisions and the dependence on soft law makes the diffusion of EU social policy ideas the more important [34]. The discursive production and dissemination of new 'policy images' [35,36] can be understood as possible way to shape, enrichen or constrain future policy alternatives [37]. In this article a discursive reorientation of energy efficiency as social policy is analysed as a way to improve and strengthen the legitimacy of certain players and practices in an EU context (cf. [38]). The focus is therefore on "rhetorical change, meant as an actual transformation of the language used by public authorities to convey specific understandings of the role and aims of social policies" ([39] p. 366). The analysis utilizes an interpretivist approach where interpretative social policy analysis diverges from mainstream positivist policy analysis by focusing on how policy actors interact by addressing "the social meaning of policies and the practices in which this meaning is embedded" ([40], p.103). The ambition is to develop "a deeper, interpretative understanding of policy practices and policy process" ([40], p.103) and understand the linkage between discourse and social practice. Language is constitutive in a more direct sense, language partially "creates what it refers to" and still linguistic change is also a "part of ongoing social change" ([41], p.8). Discourse analysis focuses on how institutions and rules are spread through usage of language. A discourse does not primarily describe reality, but it constitutes it in a specific way ([42], p. 63). A conceptual understanding of discourse is applied in our analyses of frames and merged frames.

This foundational concept underlies the strategic and deliberate activity of policy framing, which aims to generate public support for specific policy ideas ([33]: 11). Framing extends beyond mere agenda-setting; it connects with 'stable ideological repertoires' and necessitates the use of culturally accepted narratives ([33]: 2). Frames are inherently dialogical, anticipating potential opposition to undermine support for policies ([33]: 11). A critical aspect of framing analysis is frame merging, described by Fauconnier and Turner [43] as the discursive combination of two separate schemas or the incorporation of elements from one schema into another. This process results in a hybrid frame that, while comprising elements from the input schemas, emerges as a unique structure [43,44].

Frame merging is particularly valuable in reconciling seemingly incompatible and competing sets of cultural beliefs, thus addressing the dilemma of alternative and competing schemas [45]. This analytical approach provides a nuanced understanding of how policy makers craft messages that resonate with the public and navigate the complex landscape of policy advocacy. Merged frames are then hybrids that comprise elements of each of the input schemas but contribute to a new frame that becomes its own separate and unique structure [43,44].

The aim of this article is to analyse how energy has been merged with particular social policy concepts, how this frame merging process have occurred and the impact on our understanding of European social policy. The methodological approach is inspired by the findings in [6] that showed how multiple policy domains are connected to energy policy, among them social policy. The starting point of our review starts with defining dominant merged frames that consist of strong social policy concepts merged with energy policy/energy efficiency. We have defined these as merged frames as in Table 1 where we present first the social policy concept in the column 1 and then in column 2 we present the merged frame where the social policy concept is parred with an concept of energy policy/energy efficiency. We are not interested in the occurrence of social policy concepts in general, rather when established social policy concepts are explicitly connected to energy policy.

To identify the keywords that represent these merged frames a keyword in context analysis [57] of a large battery of keywords. In this abductive approach, different keywords representing the connection between energy and social policy where examined. To ensure the concepts connects to energy policy the context around the keywords where evaluated. The social policy concepts and the merged frames as well as the related keywords are found in Table 1.

A frequency analysis of these keywords was preformed while considering the context in which they are mentioned using the keywords in context analysis that is part of the quanteda R package [57]. The key phrases selected for the frequency analysis all have some connection the social policy aspects. However, they need to refer to specific concepts to be informative. "Fair" might be considered a good key word at first glance but it captures a lot of concepts outside of social policy, for example fair competition which is central for the EU internal market but does not directly refer to social policy. Using 'Fair transition' instead makes sure the occurrences relate to social policy aspects. The context of each keyword in the lists associated with each social policy frame was evaluated making sure they mainly capture social policy aspects within the policy domain of energy. Justice is a central concept in social policy but the term justice mainly captures mentions of the European Cour of Justice which is why it is excluded as a search term. Energy justice has become an established concept within academic research [4,58] but it is only mentioned one time in the policy documents, when referencing a research article, which is why it is not included as a search term. Following this quantitative overview of keywords indicating the existence of merged frames, some important documents are analysed deeper to aid our understanding of the process of reframing energy policy as social policy. The documents subject to this qualitative analysis are selected based on the patterns identified in the frequency analysis. This combination of frequency analysis together with closer qualitative analysis gives a holistic picture of the inclusion of social policy in the energy policy domain.

2.1. Material sampling criteria

The language shaping the frames come in many forms: official EU documents, public consultation, minutes from council negotiations, minutes from EP plenary sessions, verbatim transcription of EP plenary debates and letters between the institutions. These different kinds of material capture different aspects of the EU discourse and there are pros and cons of each. The views expressed by single members and party groups of the parliament could be useful for analysing the intra-institutional development of discourse. However, using official EU documents are as close as possible to the institutional consensus. These documents could potentially hide internal disagreements and points of contention, but it is less likely that the positions expressed represent an outlier opinion. Official EU documents embody the final positions of the institutions and was used in von Malmborg et al. [6] to highlight a shift in the framing of energy efficiency of buildings in the Commission. The material analysed in this article is therefore limited to official and published written material produced by the institutions involved in the legislative process.

The selection process applied filters in the advanced search system of

Table 1
Merged frames connecting social and energy policy.

Social Policy Concepts	Merged Frame	Keywords
New Deal - The New Deal was a collection of programs, public works projects, financial reforms, and regulations introduced by President Franklin D. Roosevelt between 1933 and 1938 to help the United States recover from the Great Depression. The programs were centered around what historians call the "3 R's": providing relief for the unemployed and those in poverty, restoring the economy to its previous stability, and reforming the financial system to prevent another depression from occurring [46].	**European Green Deal –** It represents a strategic merging of ecological modernization and green growth principles with Keynesian social policies, focusing on investments that address economic and social challenges. For example, investing in renewable energy projects or retrofitting aging building stock not only contributes to reducing emissions but also stimulates employment and economic growth, while tackling social inequalities such as energy poverty (von Malmborg, Björklund & Nordensvärd 2022:33). Central to this framework is the European Climate Law, which legally commits the EU to achieving climate neutrality with an ambitious reduction in emissions by 2030. Consequently, EU institutions negotiate comprehensive legislative packages aimed at driving forward the EU's climate and energy transition ([47]:15).	**Green deal** New deal
Social Justice - John Rawls' leading work. Mainly elaborated in his seminal book, A Theory of Justice, Rawls proposes a normative framework for creating a just structure of society and its major institutions—political, economic, legal, and social. These institutions play a central role in regulating the distribution of goods and social burdens among contemporaries who are members of a particular society and thus in determining their life chances [48]. **Energy Justice** is an adaption of social justice to include substantive and procedural energy justice issues. Sovacool et al. (2016: 4) define energy justice as a global energy system that fairly disseminates both the benefits and costs of energy services, and one that contributes to more representative and impartial energy decision-making. Focus is on Distribution of costs and Distribution of benefits and Procedures through due process and representation.	**Just Energy transition –** Larger than a strict social policy lens, just transition is very much discussing on redistribution of costs and profits from a transition. Environmental and climate justice is concerned with how rising costs of an energy transition might hit the poorest hardest and do participate in the profits of a transition. A just transition is both substantive/distributional justice (sharing costs and profits in an equitable way) and procedural/inclusive of the voices of weaker groups [49,50]	**Just transition** Fair transition Climate justice **Social Inclusion** **Social Exclusion** Social protection Marginalised groups Fairness
Absolute Poverty: A concept within social policy that describes effect of inequality. Absolute poverty often describes a lack of resources to maintain physical efficiency, to subsist, survive and often relies on essential subsistence/basic material needs to survive. Atkinson and Bourguignon [51] suggest an absolute line of capturing subsistence which captures the essence of absolute poverty. An individual is deemed absolutely poor if her income is insufficient to cover her subsistence needs, e.g. being sufficiently nourished or wearing clothes. In a first approximation, the real cost of subsistence does not depend on standards of living. Therefore, the absolute poverty threshold does not dependent on the income standard of the considered society (Compare Decerf, 2021). **Inequality/relative poverty:** Relative poverty means depriviation in relation to the overall population. "Individuals, families and groups in the population can be said to be in poverty when they lack the resources to obtain the types of diet, participate in the activities and have the living conditions and amenities which are customary, or at least widely encouraged or approved, in the society to which they belong" ([52]: 31)	**Energy Poverty –** if we integrate energy use with social policy the result is addressing energy poverty, which focuses on defining a subsistence minimum level of energy consumption necessary to maintain health. Although various definitions and visions exist, they generally emphasize insufficient energy consumption to meet basic human needs. Additionally, aspects like access to adequate, affordable, reliable, and environmentally friendly energy services are considered essential. Therefore, when energy use is examined through the lens of social policy, addressing energy poverty involves setting standards and criteria to ensure that basic energy needs are consistently met [53]. **Energy Inequality-**It refers to the disparities in access to and consumption of energy resources among different social groups, often highlighting the intersection of social, economic, and environmental injustices. Therefore, this concept is inherently linked to the broader notion of energy justice, which seeks to ensure equitable access to energy services and the fair distribution of energy resources, even though it is multifaceted. It follows that tackling energy inequality involves examining how energy is distributed and used, with a focus on creating a system that is non-discriminatory and inclusive [54].	**Energy poverty** **Energy poor*** Affordable housing **Affordable energy** Affordable essential services Poor* households Cost of living Vulnerable households Adequately warm Inequality Redistributive
Employment policy/ Unemployment – Employment within social policy encompasses two critical dimensions. First, there are strong connections between paid employment and the tax revenues that finance the welfare state. Second, employment serves as a vital resource for citizens, enabling them to achieve a good quality of life and integrate fully into society. Consequently, labour market policies play a crucial role in increasing access to job opportunities, particularly for the most vulnerable populations, contributing to their social inclusion. Similarly, when skills effectively match market needs, jobs facilitate the production of goods and services, improving economic growth for society as a whole.	**Green jobs** - There are often discussions that transitions towards a green economy could lead to unemployment in more carbon intensive sectors (i.e., brown jobs) and rising costs would make some jobs unaffordable. There is therefore ongoing exploration of how the green transition could be merged with employment policies and welfare/ benefits politics in reducing costs and increasing opportunities for citizens, such as adequate investment in education and training of new skills [56].	**Green job*** New job* **Job creation** Unemployed Increased employment Decreased unemployment Labour market Job opportunities Vocational education and training

(*continued on next page*)

Table 1 (*continued*)

Social Policy Concepts	Merged Frame	Keywords
Finally, employment and unemployment benefits have the potential to build public trust and democratic resilience, fostering social cohesion [55].		

the EU's official website of European Union law and other public documents, EUR-Lex. Using the search language English and searching for all documents containing "energy" returned 94 674 hits (search performed 2024-06-13). Including all 94 674 documents in the analysis would make the material too large to be able to grasp. Using the EuroVoc thesaurus categorization limiting the search to "Energy policy" limited the search to 12 388 hits. Next, the search was limited to documents authored by each of the three main institutions involved in the legislative procedure, the Commission, the Parliament and the Council. These hits contain several different types of acts, from written questions to regulations and international agreements. Since we are interested in the positions of the institutions, and we are interested in the documents reflecting the views of each of the institutions separately, the search was limited to documents reflecting their policy positions. For the Commission the search was limited to Staff Working Documents (SWD). This returned 390 documents. For Parliament the search was limited to Own Initiative Reports and Resolutions (EPOIR) which returned 353 documents. For the Council, the search was limited to all preparatory documents which are made up of different types of documents, from Council common positions to Council decisions and recommendations. This returned 62 documents. Of these 805 documents, the ones directed towards single countries, both members of the union and non-members were excluded. The reason for this delimitation is to focus on the common EU energy policy and the internal EU discourse. After this, 274 documents remain and are included in the analysis. Notably, the length of the documents varies substantially, some are brief, not extending beyond 10 pages, other documents are over 200 pages long and the documents analysed were produced between 1973 and 2024. In total the size of the material being analysed is 37 619 317 characters and the documents were distributed unevenly over the years (Fig. 1). The purpose of the different types of documents also varies somewhat from each other. The Parliaments own-initiative reports are a way for the parliament to act proactively on specific issues. Commission SWDs accompany other policy documents like proposals for directives or Commission communications and come in the form of impact assessments, annexes to EU reports or reviews of already existing policy. There is greater heterogeneity when it comes to the format of the SWDs but we argue that they work as a representation of the view and ambitions of the Commission regardless.

3. Previous research

An important strand of research on social policy have been to see EU social policy development from a constructivist dimension that is looking at strategies, resources and context factors that enabled EU social policy to find 'a raison d'être alongside national social policies [59]. "EU social policy could indeed be regarded as the realm of discourse par excellence" Barbier [60], p. 5). EU social policy lack not just legitimacy and funding of a national welfare state as European social citizenship pales in comparison to the fully-fledged national social citizenship. "The rights conferred by EU citizenship remain de facto 'isopolitical': citizens are entitled to enter the welfare space of other member states with the guarantee of non-discrimination, but they remain ultimately attached to the entitlements provided by the national welfare state of origin" ([61], p. 494). Some scholars highlight that EU Social Policy has been developing as a side show or as a spill-over effects from the potentially expansive nature of the integration process [62].

The main show has been market integration and social measure have generally been seen as market-making and not market compensating social policies. This means that the creation of EU markets can explain the pathways of EU social policies' ([63]: 279). Researchers have also highlighted that social disparities have even increased the stratification of social rights within the EU [64,65]. Streeck [66] has highlighted that EU social policy has aimed to rid barriers and be part of a negative

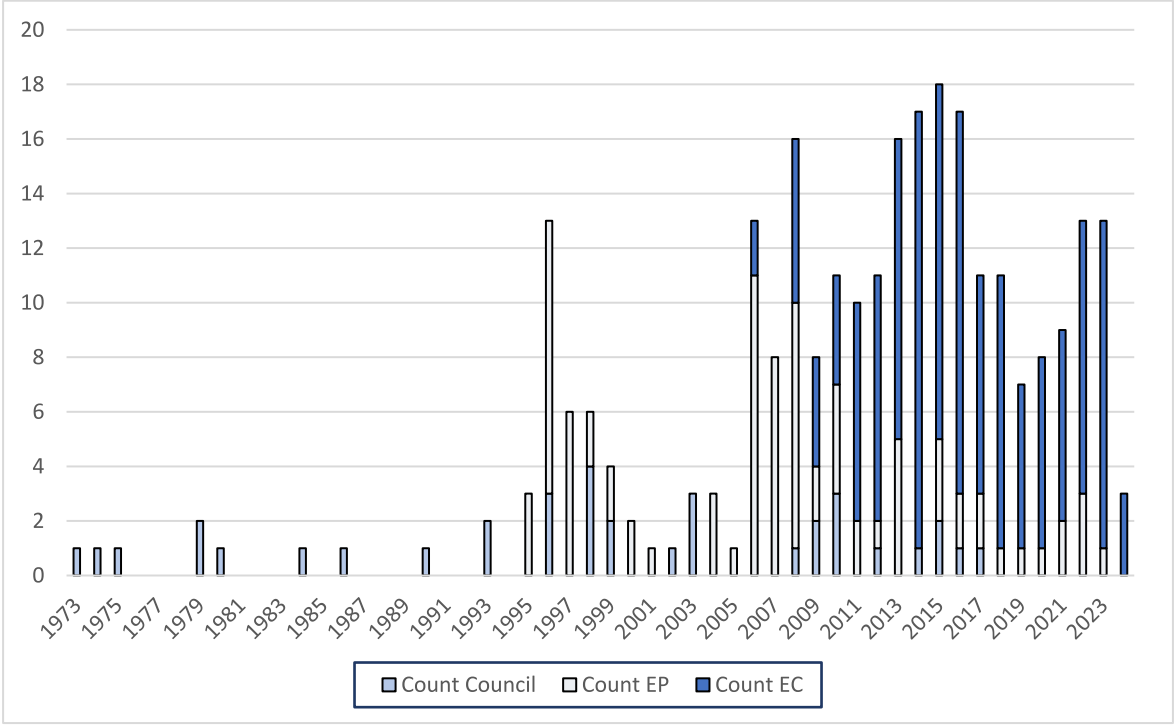

Fig. 1. Distribution of documents per year and institution. The y-axis shows the number of documents.

integration. This has created a weak foundation for more ambitious market compensating EU social policies that according to some scholars have also been hindered by the particular institutional make up and EU's weak policymaking capacities is intergovernmentalism [67]. Scharpf [68] brings up institutional barriers to understand why EU social policy lacks efficacy and tend to be technocratic. Therefore, social policy often leads to a soft-law approach that prevents enforcement of policy measures and sanctioning of non-compliance. The institutional context of the EU makes social policies dependent on national actors that plays an important role in multilevel governance system and EU social policy is understood as a result of political conflicts and trade-offs.

Previously, a justification was needed if social and environmental policy was to be analysed together [69]. This connection between social and environmental policy has now become explicit. A key challenge of the green transition is to ensure a just distribution of both the costs and benefits between subgroups of people or communities [70]. This challenge has led to a growing literature on eco-social and just transition policies to handle the social impacts of the transition [71–73]. These impacts can according to Zimmermann and Gengnagel [74] be handled by different types of social policies, protective (redistributive) and productive (economy-oriented), and to achieve democratic and social inclusion, the former is required [75], despite the institutional challenges of the EU governance system. Depending on which of a diverse array of transition pathways is chosen, different equity and justice implications will be realized [76,77]. There is a dilemma that any transitions towards new technologies, new buildings and new socio-technical systems are going to exacerbate existing inequalities (Bouzarovski et al., 2017). One important social impact of the transition towards a zero-emissions future that is often referred to in the literature is the potential unemployment effects when transitioning away from high-emission industries [73,74]. Another social concern related to the transition that has become even more central since the Russian invasion of Ukraine is energy poverty, which relates directly to the concept of energy efficiency. Energy poverty is defined as lack of access to essential energy services needed for a decent standard of living, such as adequate heating, domestic hot water, cooling and energy for lighting and appliances, and should, according to the 2023 recast of the Energy Efficiency Directive (EED), be addressed by member states as part of the energy efficiency first principle (EU Directive 2023/1791). Energy poverty is for example driven by poor energy efficiency of buildings, causing high costs related to energy, especially problematic in low-income households [78] and households risk sacrificing other social needs to pay energy bills [79]. Studies indicate that energy efficiency policies in the EU have a techno-economic approach that does not necessarily decrease vulnerability by for example creating renovation approaches that can increases rents and segregation (Grossman 2019), a phenomenon that has been referred to as "renoviction" [80].

There is an overarching idea that the EU can solve both energy poverty/inequality and reduce EU's impact on the climate simultaneously by pursuing energy efficiency. This is nothing new as these aspirations can be found in the nexus of social and ecological sustainability – the aim to find the dual purpose of reducing poverty and GHG emissions. Often there has been attempts to use the symbolism of using Roosevelts New Deal as a way to signal that we need a New Green Deal by combining both social policy, energy policy, climate policy and economic policy into one package such as EU's European Green Deal [1] where the aim is to achieve net-carbon neutrality in Europe by 2050'. In the EGD, different objectives such as environmental, climate, social and economic objectives are integrated, progressing within merged frames of an eco-social agenda in general and European Green Deal in particular [81]. The EU has been working to merge different streams of policies and discourses into a shared European policy discourse/frame. This is often done within a framework of green and environmental discursive focus such as eco-social policies/socio-ecological policies that could drive integration across policy fields [82]. As discussed by Haas et al. [83], the framework of EGD is well anchored in the ecological modernization discourse; a political theory of social change and practical discourse on environmental policy presented as a means for capitalism to deal with the environmental challenge [84,85]. There is a need to understand how the development of the policy discourse can help explain the spillover and what this says about both energy and social policy at EU level.

4. Frequency of frames and related keywords

The distribution in Fig. 1 shows that Parliament and the Commission are more productive in the period after the year 2000 apart from the years 1996 and 1997 for the EP. In 1997, the Conference of the Parties was held in Kyoto. Issues regarding sustainable development, reducing greenhouse gas emissions and environmental concern are central issues. The increased activity from 2006 coincides with the establishment of the Energy Community as well as the establishment of the Lisbon Treaty. Similarly, the large number of documents from the Commission in 2015 coincides with the establishment of the strategy for an Energy Union [86]. The outspoken goal of the energy union was according to the Commission "… to give consumers – households and businesses - secure, sustainable, competitive and affordable energy." ([86], p. 2). The Staff Working Documents produced by the Commission make up 55 % of the documents and are the most encompassing seeing that 80 % of the characters are found in Commission texts.

Table 2 organizes keywords found in the documents into the merged frames introduced through Table 1. Some of the frames like the EGD is narrower, limiting the number of keywords that fit within the frame, while other frames, like just transition include a wider range of keywords. The keywords ultimately included were selected from a larger first list. Some theoretically interesting concepts did not occur in the material, two examples being 'energy democracy' and 'energy justice', neither of which occurred in any of the policy documents. Social exclusion, social protection, energy poverty and job creations are the

Table 2
Merged frames of social and energy policy.

Merged Frame	Related keywords	Freq.	Key documents
European Green Deal	**Green deal**	**203**	EC: 52013SC0541
	New deal	**7**	(2013)
	Total:	**210**	EC: 52020SC0550
			(2020)
Just Energy transition	**Just transition**	**54**	EP: 52019IP0079(01)
	Fair transition	**10**	(2021)
	Climate justice	**2**	EC: 52020SC0550
	Social inclusion	**76**	(2020)
	Social exclusion	**225**	
	Social protection	**215**	
	Marginalised groups	**9**	
	Fairness	**25**	
	Total:	**616**	
Energy Poverty Energy Inequality	**Energy poverty**	**194**	EP: 52006IP0603
	Energy poor*	**13**	(2006)
	Affordable housing	**12**	EP: 52008IP0306
	Affordable energy	**35**	(2009)
	Poor* households	**20**	EC: 52011SC1569
	Cost of living	**9**	(2011)
	Vulnerable households	**27**	EC: 52023SC0646
	Adequately warm	**16**	(2023)
	Inequality	**61**	
	Redistributive	**5**	
	Total:	**392**	
Green jobs	**Job creation**	**107**	Council: 31980D0067
	Green job*	**15**	(1980)
	New job*	**31**	EP: 51997IP0113
	Increased employment	**6**	(1997)
	Unemployed	**59**	EC: 52009SC0503
	Employment effect*	**17**	(2009)
	Vocational education and training	**16**	EC: 52023SC0700 (2009)
	Total:	**251**	

terms within the frames that are most dominant. Despite the substantial focus on poverty and social exclusion/inclusion, redistribution is only mentioned a handful of times which might indicate that some social policy concepts are still kept outside of the energy policy domain. Important to note is that several of the occurrences of social exclusion in the material refer to statistics of people at risk of poverty or social exclusion.

Fig. 2 shows the occurrence of keywords within the different merged frames identified over time. Green jobs and just transition are dominant in the beginning of the time period while energy poverty related keywords more common later in the time period. The overall pattern before 1995 is solely based on the language used by the Council and the Commission texts are introduced first in 2006. The one occurrence of the merged frame 'Energy poverty' that is found in 1973 relates to biotopes on the countryside and is not clearly connected to social issues. Fig. 2 shows the total number of occurrences without relating it to the size of the material in each year. In Fig. 3, the numbers are adjusted based on the size of the corpus in each year, showing the frames as percentage points of all characters used in each year.

There are six Own Initiative Reports from the Parliament in 1997 which are about social aspects of housing, the competitiveness of European industry and EUs relation to ACP (African, Caribbean and Pacific Group of States). These texts are short and focus specifically on affordability of housing, unemployment and job opportunities which is why they show up clearly in the histogram. In 2000, the Parliament expressed their views on modernising social protection which is included in the Justice frame. In general, the frequency of the keywords connected to the frames differ somewhat between the institutions. In Fig. 4 the internal proportion of the frames in each institution from 2006 to 2024 is displayed. It seems that the Parliament tends to push harder on the social aspects in documents labelled as energy policy compared to the Commission. This is especially the case for concepts related to justice like social inclusion and exclusion. The Council contributes minimally to the discourse but uses a balance of keywords related to both energy poverty as well as just transition. Important to note is that the Commission produce significantly more text than the other institutions and when relating the occurrences to the number of tokens produced by each of the institutions the frames take up a larger proportion of the texts in both the Parliament and the Council. The growth aspects of the transition are more central in the Commission which makes the connection to the internal market more explicit.

Within the Energy poverty frame, affordability of energy, vulnerable groups and households as well as inequality are included. But of the 439 occurrences of keywords within the frame, the most common single keyword is energy poverty itself. The analysis reveals that the term of energy poverty, which explicitly connects social and energy policy, first appears in EU energy policy in 2006, with notable increase in use, the first around 2015 and the second after 2020 coinciding with the Covid-19 pandemic (Fig. 5). It appears that before the official introduction in internal EU energy policy, the term was used in the context of discussing energy cooperation with developing countries. The concept of energy poverty is given a lot of attention in a Commission SWD aimed at monitoring the progress towards the Energy Union objectives [87]. In this document energy poverty is mentioned 20 times and in total in the material it is mentioned 194 times. Other concepts are less frequently used. For example, cost of living is only mentioned by the Commission in 2023 and 2024 while climate justice is only mentioned by the Parliament in relation to the two most recent UN climate change conferences and uses justice as justice between countries globally rather than individuals.

Based on hits on the search-term "energy poverty" within the EUR-lex database, the first time the concept of energy poverty is mentioned by an EU institution was in 2002 by the Commission in a Communication to the Council on energy cooperation with developing countries [88]. Importantly, while energy poverty (also known as fuel poverty) had already been in use in other domains prior to this, within EU institutions the term was subsequently used in the internal policy debate of the European Community by the European Parliament in 2006 in their resolution on the Energy Community Treaty [89]. Although this might have not officially established the nexus between energy policy and energy poverty, it provided an opportunity for the EP to address related issues and requests for clarification from the Commission and Council on provisions and programs aimed at reducing widespread energy poverty. In Fig. 5 the use of "energy poverty" in policy documents is split up by institution.

In line with this, not only has energy poverty increasingly been used in various contexts, but it has also emerged as a pressing issue in the EU. Observing these different contexts, it becomes clear that factors such as rising living costs, poverty, job creation, and energy communities significantly impact the functioning of the EU and highlight the interests of EU institutions. The spike in 2023 can be traced to two specific documents. One is the assessment of progress towards the objectives of the energy union and climate action [90] and the other is the Commission staff document on the progress of the implementation of the SDGs [91]. Furthermore, an increase in associations between energy poverty, energy efficiency, and vulnerable households became evident during the recasting and discussion of the EED (Directive (EU) 2023/1791) and the EPBD (Directive (EU) 2024/1275), where combating energy poverty was seen as one of the multiple benefits with the transition towards more energy efficient buildings.

Thus, the analysis of the concept of energy poverty shows that this has progressively emerged as a significant concern within the EU, as shown in its increasing prominence across various policy contexts. Additionally, external events such as the Russian invasion of Ukraine in 2022 and the Covid-19 pandemic might have triggered discussions on energy poverty and related topics, highlighting the interconnectedness between geopolitical events and energy policy discourse. Notably in this context, EU institutions, particularly the European Commission which could be regarded as an influential policy entrepreneur, play a central role in addressing energy poverty and related challenges.

5. Discussion

5.1. Discourse in the energy and social policy nexus

Energy policy has been framed from different angles within the EU discourse such as achieving sustainable, competitive and secure energy supply as these qualities were dominant pre-2006. The energy discourse in EU focuses pre-2006 not particular strongly on merging social policy with energy efficiency/energy policy. Early in EU energy policy, the connection is made between transitioning towards a green economy and employment effects. Job creation is discussed by the Council as early as the 70's and 80's [92] but it is discussed in relation to economic policy rather than energy or climate policy. The findings in section 4 indicates that something happened to the energy and social policy nexus around 2006. This overlaps with the establishment of the Energy Union and the adoption of the Lisbon treaty.

There is a focus on energy affordability but otherwise very little social policy perspective on energy. Most writings are related to market mechanisms, combat climate change, creating green employment opportunities, innovation and competitiveness. The commission is encouraged by the parliament to help the member state "analyse the trade-offs between different policy options with regard to the environment, security of supply, competitiveness and job creation and that thus helps to minimise risks" ([93], point 3).

In 2006 Parliament document the focus was on "EU's three objectives in the energy field, namely security of supply, competitiveness, and environmental sustainability" (2006a). In the end of the Parliamentary document commenting on the European energy strategy, two social dimensions are highlighted: energy poverty within the EU and energy and development outside of the EU. The former is more central to our analysis and the document states that

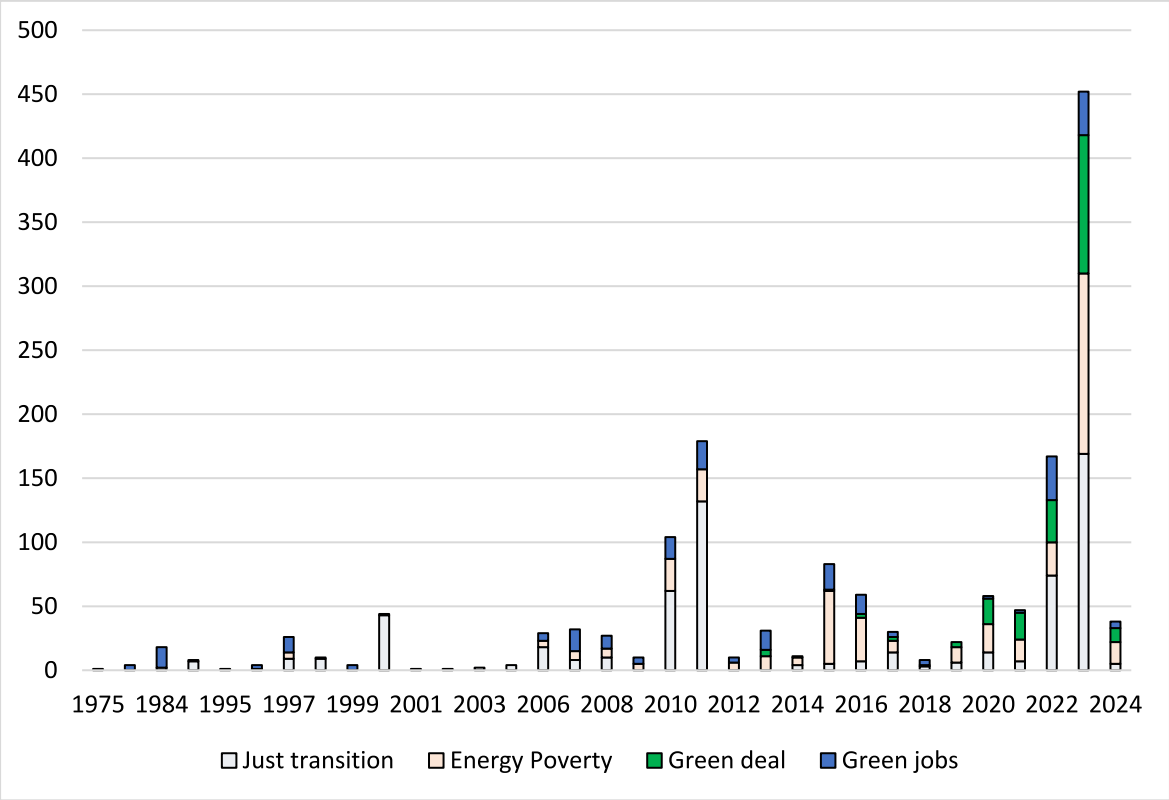

Fig. 2. Frequency of frames over time.

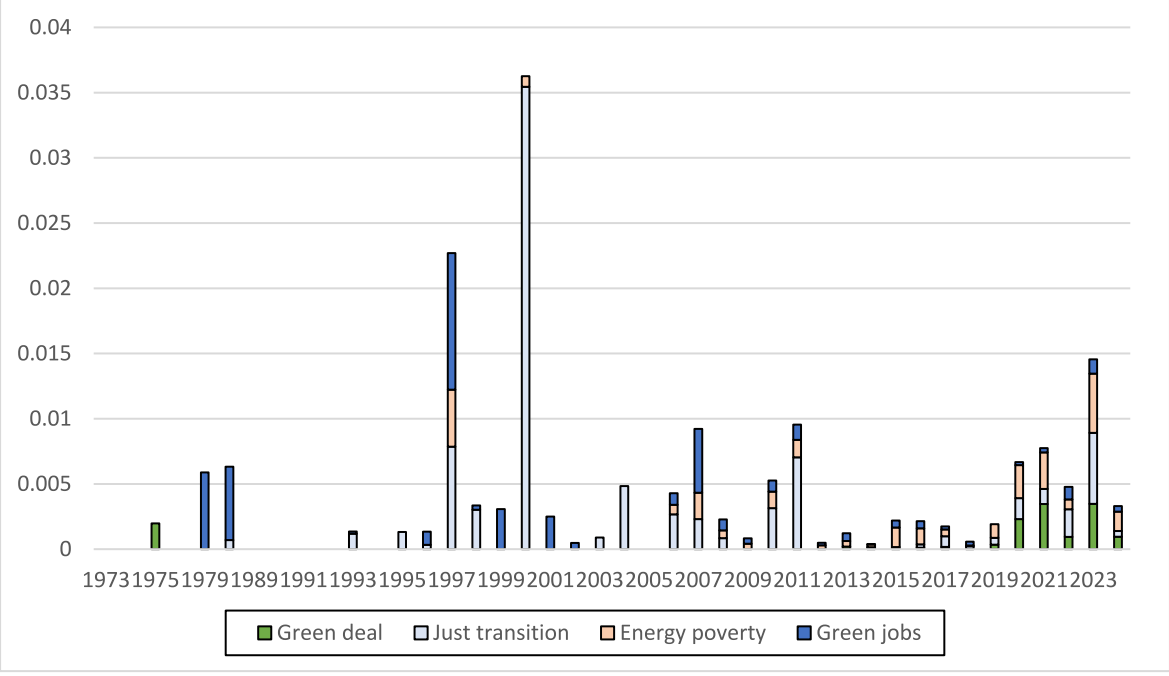

Fig. 3. The frequency of frames adjusted to number of characters in the material for each year. The y-axis shows the percentage of the total amount of text.

"**consumers** must be placed at the centre of all future energy policies and that energy poverty should feature more clearly in the Commission's proposals; recalls that consumers, particularly public authorities, which must set an example in this area, also have obligations in terms of energy economy; recognises the central role that smart metering and billing can play in increasing consumer awareness of how and why energy is being used and therefore in changing consumer behaviour; calls on the Council and the Commission to propose measures which help low income households to achieve energy savings in their homes, thereby reducing their energy bills and their exposure to future price increases" ([93]: point 104)

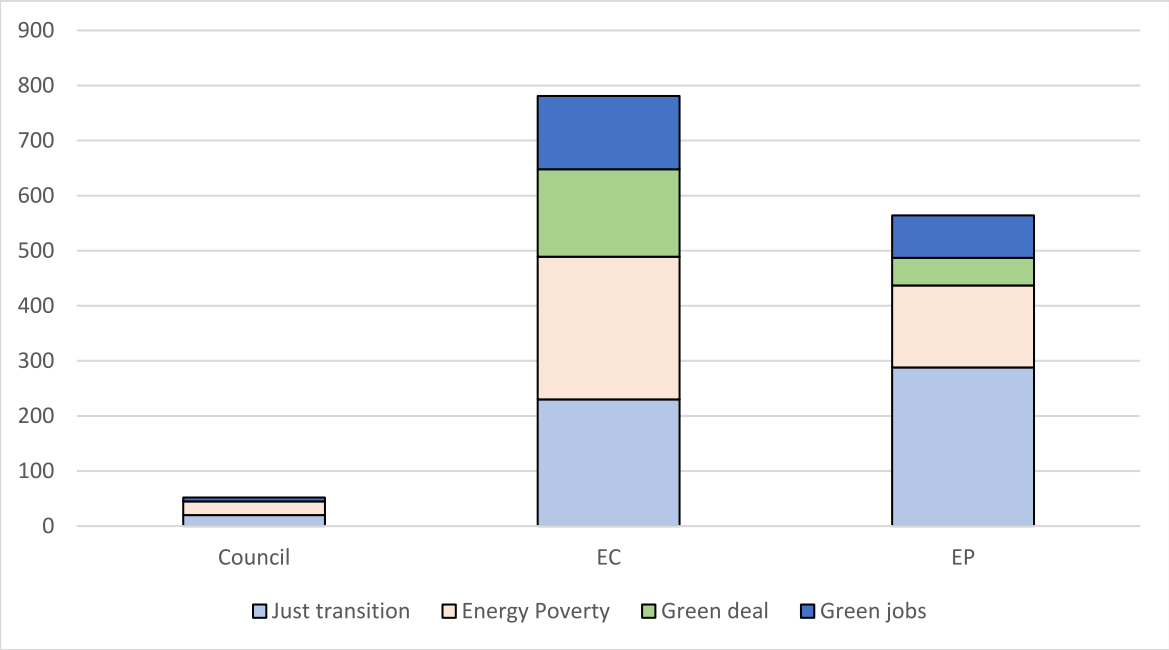

Fig. 4. The frequency of frames in each of the institutions.

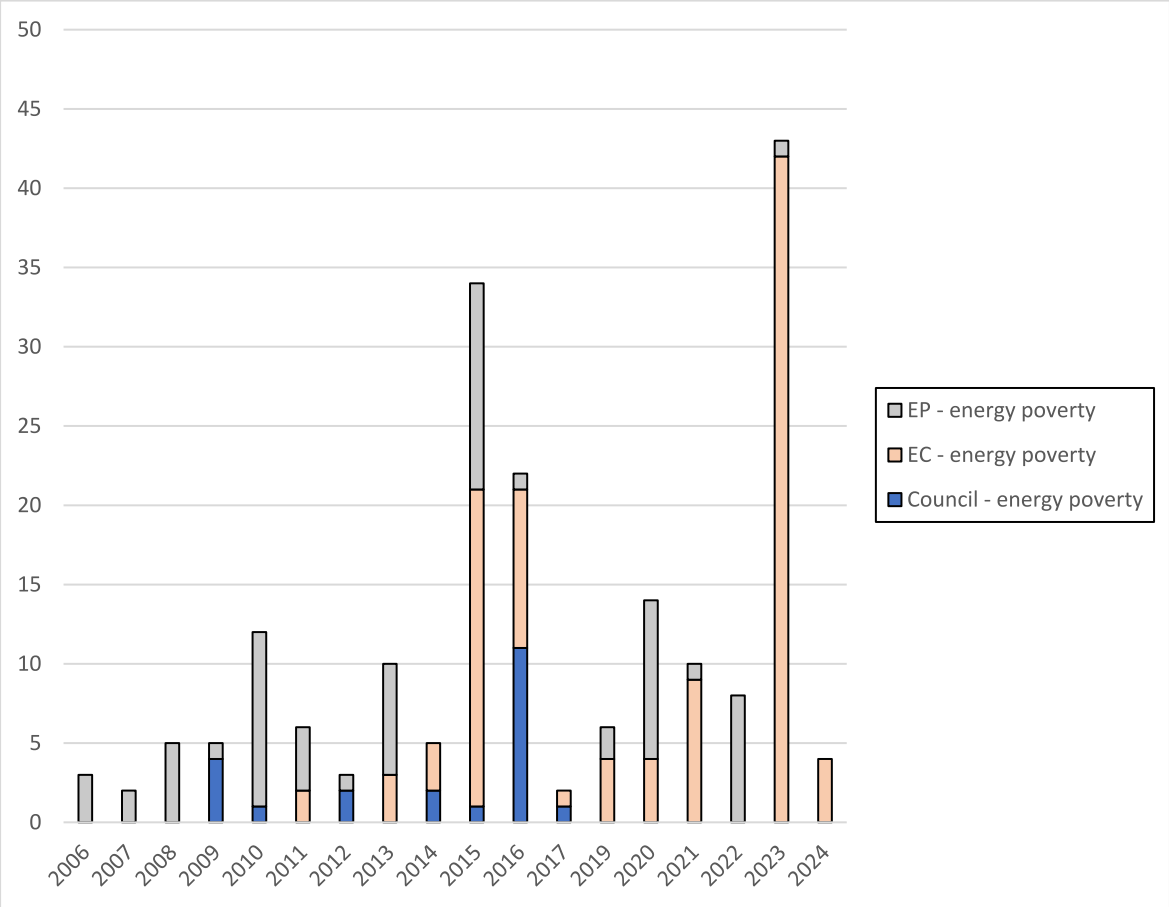

Fig. 5. Frequency of 'energy poverty' over time per institution.

We can see that the social aspect is developed by linking the concept of citizen with energy consumers which is framed using concepts like "social inclusion", "equal opportunities" and "fair access to knowledge" in the digital area – the focus lies on that citizens should have access to "affordable energy" and get the right information to participate in the energy market in an informed way. One can see an underlying link to

discussion to a procedural understanding of justice that people should have access to information in addition to a less developed frame around substantive access to energy as a prerequisite for societal participation. Most of these thoughts are in the background and are not explicitly introduced or discussed.

Often the social dimension is merged with an economic/market dimension. In an own initiative resolution from the European parliament from 2009, it is stated that consumers and small/medium-sized enterprises (SMEs) have one-sided "limited tools at their disposal and opportunities to represent their interests in an effective way" [94] implying the need for policy support. The document further highlights that adequate energy provision is key towards "citizens' successful participation in social and economic life" [94]. The document therefore highlights that governments, energy regulators and industries/social partners should make sure that the energy consumers rights are taken into account. There is often an overlap between citizen and consumer rights/interests.

The European Parliament writes out in the document that it perceives that there is "imperfect competition" in the energy market and that it lacks in protection of the interests of the consumer. Moreover "[m]ember States have made only limited use of targeted public service obligations to address the needs of vulnerable customers, whereas there should be a strong focus on the role conferred on the National Regulatory Authorities (NRAs)" [94]. There is a focus on national regulations and very little emphasis on an EU-level redistribution to fix flawed market conditions and lack of protection for vulnerable energy consumers whose rights should be protected. Furthermore, there is considerable focus on the knowledge of consumers that needs to be improved as they often lack knowledge of the market and are not always protected well through legislation. We have here the European Charter on the Rights of Energy Consumers in order to allow consumers to choose energy sources that highlights that "energy supply is a key element for the successful participation of citizens in social and economic life" [94], consumers rights are legally protected but these rules are not often respected and needs to be implemented more effectively and policies/regulations need to be a joint action between European Union and Member States to solve market issues such as large monopolies, lack of accessible information, vulnerability of consumers but the end goal is here to create a single, competitive energy market. The merging between single market, social policy and energy policy signals a wish that the EU together with the nation state must solve this perceived social policy dimension of an internal energy market.

Meanwhile, the focus on rights/universal rights, linked to access to energy for diverse groups indicates a merged frame between citizen and energy consumer. Often these should be offered access to not just energy but technology and knowledge that can save them money and energy. Processes, information access, consumer help and transparency are somethings highlighted as needed to improve upon. The framing here connects energy poverty to the concept of consumers instead of focusing on citizens. The social aspect is therefore looking at how consumers and public authorities build awareness and change consumer behaviours to reduce their energy bills, protect from future price increases which falls between education and nudging consumers in a particular direction. We can see links to the discourse seeing citizens as consumers [95]. Therefore, the social aspect that are aimed explicitly towards citizens is mainly on education and behavioural change more than any redistributive understanding of energy policy. "Consumer participation in the energy system is vital for achieving a sustainable and efficient energy future" and "the increasing emphasis on environmental responsibility and the need to reduce carbon emissions, many EU Member States are setting ambitious goals to involve consumers in the energy transition" ([90] point 2.4.5).

Energy poverty has emerged as very frequent used as an urgent imperative that has been affecting households in Europe and becomes even more urgent during the energy crisis in 2021–2022 and the crisis acts as a catalyst "prompting the need for immediate action or a re-evaluation of previous efforts". The policy goal is then "reducing the number of households experiencing energy poverty so far". EU commission is prompting the importance of the problem while also highlighting that the nation states need to define national objectives/strategies. "Various countries in the EU have recognized the urgency of tackling this problem and have established national objectives and strategies to mitigate energy poverty" ([90] point 2.7). In this sense we can observe a divide between the EU, through the Commission, defining and monitoring the problems through different kinds of established energy poverty indicators (see Commission Recommendation, 2020/1563 [96]), and its minimal influence over how policies are enacted nationally. Therefore, a lot of the discourse around energy poverty is trying to list and discuss national approaches, methods and outcomes in different EU member states which includes "qualitative national targets, which stress the importance of enabling all segments of society to afford their essential energy and mobility needs at reasonable prices" or national "set specific targets tied to eligibility criteria for implementing direct tariffs or bill support and dedicated funds" or "comprehensive national strategies, often in conjunction with energy efficiency and housing renovation policies and programmes" (European Commission, 2023a point 2.7) [90].

In their communication with the Commission, the Parliament has pushed for a greater focus on energy poverty as a problem. Energy has also been called a public social good which might indicate that the Parliament to a greater extent attempts to separate the access of energy from the market mechanism which is often made in Commission documents. The somewhat diverging view of the Parliament is illustrated in the quote from their commentary on the Energy Union in 2015.

> The European Parliament … Reiterates that energy is a public social good and that the EU should therefore focus closely on the issue of energy poverty and promote concrete measures to tackle this problem; insists, therefore, that the Energy Union should ensure equal access to energy for all, contribute to affordable energy prices for the benefit of consumers, promote connections and energy infrastructure that have a strategic role for the benefit of the people, and strengthen regulation; ([97] point2)

The documents often list different attempts in linking social policy with energy efficiency in a national and local context. The EU therefore pushes the importance of energy poverty as a critical policy issue that needs to be tackled and here links the rights of citizens to affordable and essential energy services. However, there is still not a shared understanding of what Energy Poverty is and the uses this ambiguity to open a space where EU can operate and participate in a field that is traditionally seen as out of reach. The EU often highlights that there are no universal agreed, official or even explicit definition of energy poverty in all of EU member states. "There is clearly scope for the Commission to provide additional guidance to the Member States" ([90] point 2.7). This opens a space for EU to guide national governments to handle energy poverty.

> "Energy poverty has been firmly acknowledged and legislated within EU law, with Member States bearing the responsibility of assessing the number of energy poor within their respective territories and implementing remedial measures in case of significant incidence. Quantitative data on the number of affected households provides essential insights into the scale and nature of the problem in different countries." ([90] point 2.7).

There is little clarity around how the EU institutions understand the concepts of social and/or environmental justice and even if they use the concept of Green New Deal there are few discussions on the link to either Roosevelts New Deal or general principle of Keynesian social politics. They work as unifying frame that tells us what terms and concepts are accepted and when they are accepted, there is a rise in the frequency of usage and cross-references.

The role of EU is not about just defining, monitoring and pushing focus on energy supply and efficiency but there are certain elements of

Social Investment State policy where the EU opens up funding for addressing Energy Poverty in a local, regional and national context. There is therefore a small redistributive aspect of energy efficiency that are often linked to the Cohesion fund for an example. For an example the Just Transition Fund had a proposed allocation of EUR 17.5 billion earmarked for energy efficiency and circular economy investments as its eligibility areas or InvestEU Just Transition Scheme or JTM a public sector loan facility to support public sector entities by combining grants from the EU budget with loans. The important aspect that member states can use various types of investments and schemes through the Cohesion Funds including REACT-EU including renovation of public buildings with cohesion policy fund or sustainable renovation of social housing. With the recast EED of 2023, the EU also encourages member states to address energy poverty in designing policies to meet the national energy savings obligations. Furthermore, the social climate fund has introduced a structure of financing that have the explicit purpose of alleviating energy poverty and support vulnerable households (Regulation (EU) 2023/955).

We can see in general that EU often use umbrella concepts, established within EU policy, such as Just Transition and European Green Deal that might have some social policy connotations based around climate and/or social justice similar to Roosevelt's New Deal in the 1930s that combined social spending and support of the economy to kickstart the American economy after the depression.

Still when we do in-depth reading, we can see merging energy and social policy gives indication that we do not see an overall overhaul of EU Social Policy, but the social dimension is about adding benefits to already existing EU policies and competencies. If we go through the used concepts, we can see that the social policy dimensions are very vague and often seems to aid other EU policy goals. We have found three overarching functions that appears by merging social policy with energy policy in general and energy efficiency in specific.

1. Added benefits (EU should focus more into energy efficiency as it has social benefits) - we observe a general tendency of the EU trying to add multiple benefits the implementation of the solution in one policy domain. "The Communication recalls the European policy framework for renewable energy: the importance of renewable energy for meeting our climate change and sustainability objectives, improving the security of our energy supply and developing an innovative European renewable energy industry to generate jobs and wealth for Europe" [98].
2. Increased focus on energy efficiency, e.g. through making the Energy Efficiency First principle legally binding [99,100]. The EU should focus more on energy efficiency as energy poverty is such a pressing issue.
3. A jigsaw in the larger sustainability puzzle (to reach a sustainable transition the social dimension of energy policy/efficiency is needed to make it more just and inclusionary). The transition needs wide support and optimally does not exacerbate other societal problems.

Merging frames and adding benefits is key to E.U. policy where the actual concept (poverty, inequality, unemployment policy) are often vague and larger frameworks such as Green New Deal and Just Transition works more as shared frames but lacks in distinctive content.

5.2. Policies in the energy and social policy nexus

Beyond talk about energy poverty, the EU has adopted policies and instruments to facilitate energy policy alleviation. Provisions were strengthened with the 2021 *Fit for 55* package, including the recast EED that requires member states to explicitly consider energy poverty when developing policies to reach national energy savings objectives (EED Article 8). Energy poverty is also mainstreamed into the EU Emissions Trading Scheme (EU ETS) since the inclusion of buildings and transport [30]. The *Affordable housing initiative* (AHI) aims to ensure that social and affordable housing facilities also benefit from the renovation wave, guaranteeing that local social and affordable housing projects get access to necessary technical and innovation capacity and project support to become green and improve energy and resource efficiency. But the initiative is unlikely to provide sufficient support for alleviating energy poverty. It provides no new EU funding, but channels existing funding from different EU sources, i.e. Horizon Europe and Single Market Programme, and relies on the EU multi-annual budget. Thus, the initiative runs only to 2027, if no new funding is allocated. So far, only 28 out of 100 pilot lighthouse districts have been launched, including only 14 of 27 member states.[3]

In addition to legislation to ramp up GHG emission reductions, the Fit for 55 package included mechanisms to cushion the impacts on vulnerable regions, sectors and citizens. One such mechanism is the *Just Transition Mechanism* (JTM)[4] aiming to alleviate costs of decarbonization in heavily affected territories and sectors. Considering buildings and energy poverty, the Social Climate Fund (SCF) aims to prevent pushing more Europeans into energy poverty from increased energy prices due to the extension of EU ETS to buildings and transport, and to tackle already existing inequalities in the societies. Thus, both JTM and SCF are supposed to be a key mechanism to "leave no one behind" as stressed in the European Green Deal (EGD). SCF provides EU member states that have drafted national *Social Climate Plans*, listing and explaining all planned measures and investments in support of vulnerable groups, with dedicated funding so that the most affected vulnerable groups, e.g. households in energy or transport poverty, are directly supported. SCF funding can be used to support structural measures and investments in energy efficiency and renovation of buildings, clean heating and cooling and integration of renewable energy, as well as in zero- and low-emission mobility solutions.

Analysing the SCF from energy justice perspectives, many scholars have found that the Commission recognises the unequal distribution of costs between EU member states and that some will need more financial support to reach their climate targets while not pushing more people into energy poverty. However, the design of SCF does not recognise the vulnerabilities on the regional and local levels, leaving governance of energy poverty alleviation the hands of national governments without the inclusion of local governments. In conclusion, they argue that SCF is neither ambitious enough in terms of money and time to adequately deal with distributive injustice, nor inclusive enough to adequately deal with process injustice and cater for social acceptability and legitimacy (Bülbül, 2021; Defard & Thalberg, 2022; [101]). Generic transfer schemes are such as SCF are insufficient and inefficient to tackle the problem of energy poverty head-on, which calls for dedicated policy interventions [30]. These findings are confirmed by other scholars, claiming that policies and tools associated with the just transition inside the EU do not lead to a just transition that adequately addresses social problems [3,102]. A reason for the strong link between energy poverty alleviation and energy efficiency policy in the EU is the dominant techno-economic approach to address energy poverty [103]. The setup and institutional design of EU institutions seem to hamper their design and implementation of a just transition [104]. Especially in areas where the EU does not hold much legal competence, such as social affairs policy, they have limited ability to overcome the institutional factors that hamper implementation of a just transition [104,105]. In the EGD and Fit for 55, just transition is seen broadly as a transactional and financial transfer policy, e.g. through SCF and JTM, with targeted financial support to affected member states and regions [106,107].

Adding to the scholarly debate on policies to alleviate energy poverty, Primc and Slabe-Erker [108], p. 35) stress that "energy poverty

[3] Ibid.

[4] Just Transition Mechanism. https://commission.europa.eu/strategy-and-policy/priorities-2019-2024/european-green-deal/finance-and-green-deal/just-transition-mechanism_en (Accessed 3 June 2025).

is a product of the complexity and substantial interdependence of drivers", and that "any driver may have a different effect on energy poverty depending on the presence or absence of other drivers". There is no one-size-fits-all solution. If energy poverty is characterised by a combination of non-high household income and energy policy, the energy price level does not play a role in the solution. Social policy, such as social welfare payments or direct payments of energy bills, might work better. But the total cost of implementing such measures might become enormous if energy deprivation is widespread. Only those EU member states with the wealthiest households can afford to treat energy poverty as a manifestation of poverty in which low-income households suffer from energy deprivation. However, seeing energy poverty solely as another form of poverty might hamper other forms of progress, for example, related to the natural environment and health. For low-income countries, the existing energy-policy focus does not yield the desired results while, at the same time, social policy is hardly available. Primc and Slabe-Erker (2020 suggest that these countries need affordable, yet clean technologies, both for energy efficient housing and modern energy infrastructure. Providing universal access to such technologies requires significant investment, which could be compensated for in the form of social energy financial support.

But policymaking to address energy poverty is further complicated by the lack of consensus among EU member states regarding a standardized criterion for quantifying energy poverty [109]. EU member states are developed countries that should deal with the affordability of energy services rather than accessibility. However, only a few member states have official definitions for energy poverty, leading to uncertainty in comprehending its scope or consequences at the state level. Although the Commission has agreed to use three benchmarks (insufficient warmth within dwellings, energy arrears, and dwelling quality issues) to evaluate energy poverty, several studies have raised concerns that they fail to capture the full extent of the problem [109].

6. Concluding remarks

6.1. Conclusions

The discursive connection between energy policy and social policy is evolving over time and in most cases, it is the European Parliament that first make the connection which the Commission then internalize. A good example of this inter-institutional pattern is the introduction of the concept of energy poverty to the domain of EU energy policy. It is first used in a foreign policy context by the Commission, but a few years later it is introduced by the parliament in a parliament resolution on the energy community treaty in 2006 (Compare European Parliament, 2006a; [89]). The concepts of 'energy poverty' and 'just transition' are themselves a result of the frame merging which is achieved after they first have been introduced separately and kept parallel. Throughout the years and the documents, energy appears as a dynamic and versatile concept, intertwined with welfare, sustainability, and security thereby contributing to making energy a multifaceted concept and discourse. Some of the connections to social policy within energy policy have little substance and are implicit, which is the case with the European Green Deal which should only be seen as a nod to Roosevelt's New Deal as no explicit connection can be found.

Promoting energy efficiency was historically primarily motivated based on energy security of supply concerns due to the 1970's oil crisis and environmental concerns in the 1990s and the need to reduce greenhouse gas emissions. While security of supply and reducing emissions remains an important factor, social concern has become an important motivation to increasing energy efficiency. The establishment of energy poverty as a concept marks a step towards a merging of the social policy context of poverty with the with the traditionally more technical field of energy and energy efficiency. Energy poverty has been integrated into an EU discourse of eco-social policies and are being addressed as energy policy, social policy or a mix of instruments at the EU level. Energy policy and energy poverty have become understood through the lens of EGD: "the risk of energy poverty must be addressed for households that cannot afford key energy services to ensure a basic standard of living" ([1], p. 6). Even though the social policy aspects of energy policy are cemented by the Commission through the concept of energy poverty, it was the Parliament that first made the connection between energy policy and social policy, mostly because they seem based on our findings to be more engaged in social issues, like equality, justice and redistribution compared to the Commission and the Council. We can't show if this is the case more generally but when it comes to introducing social policy aspects into energy policy it seems to be the case.

When using frequency analysis, only general patterns can be captured, which of course is a limitation of this approach. The use of example from some of the documents to highlight the connections between the policy domains nuances the rough picture painted by the quantitative approach. The focus of this paper is to a large extent on the interinstitutional discourse, further research on the discourse within the committees of the parliament is needed, especially since it has been shown that institutional consensus often hides internal disagreement, at least within working groups of the Council where the consensus reached in Council general agreements rather can be described as a fragile compromise between the member states (e.g. [110])

Even though our inter-institutional approach indicate that the Parliament pushes the social policy envelope, the Commission seem to quickly internalize the social policy aspects and uses this strategically to justify further EU policy. The findings of the paper indicate that 'energy efficiency policy' is the main connection between social and energy policy. It has also become central to some recent policy initiatives. Energy poverty seems to be well integrated in the EU energy policy framework in terms of highlighting it as an important policy issue to leave no one behind in the clean energy transition. Energy poverty is mainstreamed into energy efficiency policy and taxation policy. Energy poverty has become central to the recent recast of EED where it is mentioned 85 times and article 8 of the directive urges member states to consider energy poverty when they design policy instruments to reach national energy savings obligations, while article 24 is explicit about obligations of alleviating energy poverty (Directive (EU) 2023/1791) [111]. There are also more direct measures to alleviate energy poverty. The Affordable housing initiative will ensure that social and affordable housing facilities also benefit from the renovation wave to become green and improve energy and resource efficiency, but it has limited funding and is rather short-term. The Social Climate Fund is an example of how social policy concepts such as poverty have formally merged with energy policy since a key part of the regulation is that financing should focus on alleviating energy poverty (Regulation (EU) 2023/955) [112]. In contrast to AHP, SCF is based on revenues from EU ETS instead of the EU multi-annual budget. However, critics claim that SCF is too centralised to EU and member states and that the focus is on transactional and financial transfer policy. Social and human aspects of social policy as well as inclusive democracy are largely left behind.

The ambition of increasing the scope of EU social policy is clearer in the Parliament while the motives of the Commission in their preparatory documents is more ambiguous and it can both be understood as realizing the current political vision or a strategic extension of their competence. There are still bastions of social policy which have not been merged with energy policy, at least when looking at preparatory documents. There is, for example, minimal discussion on redistribution in policy documents. We also observe that both the academically important concepts of 'energy justice' and 'energy democracy' do not occur in the material.

6.2. Policy implications

We can see that energy efficiency says something deeply about how E.U. policymaking is working in quite complex ways of expanding policy competence and policy making through integrating a core EU field

(energy policy) with other policy areas such as social policy. This paper has highlighted how frames are merged through a development over time in an interinstitutional discourse. This co-creation of new frames shows how policy domains are expanded by the use of language. Previous research has shown how energy efficiency strategically has been framed by the Commission as providing multiple benefits [6]. Our findings highlight the process of development of concepts before they appear in an official policy proposal. Concepts and definition do not just appear, rather they are translated from one context to another through a process of frame merging. The external factor of Russian invasion of Ukraine and the connected energy crisis has likely aided the merging of EU social and energy policy.

The fact that some core social policy concepts like redistribution has not really been established in the interinstitutional discourse would strengthen the findings of von Malmborg et al. [6] that shows how the Commission use frames strategically to increase their influence. In the nexus of social and energy policy it seems that the Parliament pushes more for merging, which the Commission uses strategically while the Council tends to act more conservatively. Something that can be seen by their focus on the principle of subsidiarity when discussing new policy initiatives [110]. Questions of taxation and redistribution is also generally considered to be a core competence of the member state which probably limits the extent to which redistribution plays a role, despite the introduction of the social climate fund and the just transition mechanism.

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Declaration of competing interest

The authors declare that they have no known competing financial interests or personal relationships that could have appeared to influence the work reported in this paper. Johan Nordensvard reports financial support, article publishing charges, and travel were provided by Swedish Energy Agency. If there are other authors, they declare that they have no known competing financial interests or personal relationships that could have appeared to influence the work reported in this paper.

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Data availability

No data was used for the research described in the article.

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