

CEER Strategy:
“Empowering consumers for the energy transition”
Stakeholder Consultation – Evaluation of Responses

10 June 2021

1. Overview

This document responds to [a stakeholder consultation exercise](#) about CEER’s strategy “Empowering Consumers for the Energy Transition” for the period 2022-2025.

The purpose of the consultation exercise was to capture feedback that can help working groups to identify priorities for the first year of the strategic plan and the work programme for 2022. It will also inform an ongoing discussion at CEER Board and GA levels to discuss and approve the proposed changes of the draft Strategy document to address the comments.

The strategy is built around three broad regulatory dimensions each of which has two core areas, six in total. Each of the six core areas contain key examples that reflect appropriate strategic activities for the period 2022-2025. What is shown below are the three regulatory dimensions and six core areas **as they appeared in the draft strategy** – the final strategy document made some changes to the details of these elements, though not to their main headings.

Three regulatory dimensions



Drawing on these three regulatory dimensions, the six boxes below contain, as was envisaged at the time of the draft strategy, a more or less complete list of topics to be worked on by CEER as was envisioned in the draft strategy for public consultation.

The 6 core areas of CEER's Empowerment Strategy:



Given a final strategy, CEER's work programme items for the period 2022-2025 will prioritise activities that contribute to implementing these six core areas and to achieving our strategic aims. That is to say, CEER deliverables and activities should contribute, directly or indirectly, to outcomes that further these goals.

2. Participating Stakeholders

Twenty stakeholders participated in the consultation exercise and they have provided feedback in response to three key questions:

1. To what extent have we captured with the three regulatory dimensions energy regulators' proper focus to empower consumers for the energy transition?
2. Are the six core areas the appropriate areas of focus for CEER's work in 2022-2025?
3. Please indicate if you identify any missing important topic(s) for energy regulators within the stated six core areas.

Stakeholders have been categorised as belonging to one of four groups, in order to help identify and evaluate if they have common themes or issues regarding CEER's strategy. **CEER sincerely thanks all of the listed stakeholders for taking the time to give their input.**

Consumer Associations	Industry Associations	Energy Companies	Think Tanks
BEUC	UPRIGAZ	Enagás, S.A.	The Regulatory Assistance Project (RAP)
KEPKA (Greece)	GEODE	EDF	
EKPIZO (Greece)	REScoop*	ENEL	
DECO (Portugal)	currENT	Enedis	
	smartEn (Smart Energy Europe)	ENGIE	
	European Energy Retailers		
	Eurelectric		
	Eurogas		
	European Renewable Energy Federation (EFET)		

* REScoop represents non-profit Citizens Energy Communities, unlike the other associations in this category, which represent for-profit entities.

3. Responses to Questions

Overall, respondents agreed with and were positive about the three regulatory dimensions and the six core areas developed by CEER.

Some bullet points referenced under the six core areas have been adjusted and they now provide a comprehensive overview of the themes to be addressed in future CEER work programmes.

It should be noted that future work programmes will be based on CEER Strategy and they are different documents.

Below please find some of the most important stakeholder considerations and suggestions, including suggested topics (per question 3).

Stakeholder considerations and suggested additional topics	CEER response
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<ul style="list-style-type: none"> • Green claims / Greenwashing and GOs 	<ul style="list-style-type: none"> • This is an important topic and CEER could emphasise it more. However, this topic will appear in work programmes, rather than a strategy document.
<ul style="list-style-type: none"> • Monitoring individual Member States for transposition of EU directives 	<ul style="list-style-type: none"> • This is not a legal task for NRAs or CEER but for the European Commission.
<ul style="list-style-type: none"> • Consumer energy data and access to it 	<ul style="list-style-type: none"> • CEER agrees that all market actors should be provided with access to the same data (non-discriminatory), subject to compliance with consumer privacy concerns and permissions. Data management will be added to the core area of consumer centric design.
<ul style="list-style-type: none"> • Not all consumers want to be equally active. 	<ul style="list-style-type: none"> • CEER acknowledges this and the strategy does not intend to imply the contrary. A clarification has been added.
<ul style="list-style-type: none"> • Energy taxation 	<ul style="list-style-type: none"> • Taxation is not a core responsibility for regulators but rather for policy-makers.
<ul style="list-style-type: none"> • Distinguish demand response appearing in two different core areas. 	<ul style="list-style-type: none"> • This has been clarified.
<ul style="list-style-type: none"> • Other stakeholders besides consumers have important roles in the energy transition. 	<ul style="list-style-type: none"> • CEER acknowledges this and is well aware of the fact that the energy transition requires a joint effort of all actors. Other important stakeholders are mentioned in chapters 4 & 6.
<ul style="list-style-type: none"> • Cost efficiency 	<ul style="list-style-type: none"> • This topic is covered in section 4.2 of the CEER strategy.
<ul style="list-style-type: none"> • Decentralised energy and traditional energy sources must not be at odds in the market model 	<ul style="list-style-type: none"> • In line with the strengthening of the market-based approach of the CEP, CEER calls for efficient price signals in the strategy.
<ul style="list-style-type: none"> • E-mobility and related topics (e.g. charging infrastructures) 	<ul style="list-style-type: none"> • This is addressed by CEER as part of the topic, energy system integration and is also included in the megatrend “mobility”.
<ul style="list-style-type: none"> • More detail on regulatory issues related to energy communities 	<ul style="list-style-type: none"> • This theme will be further tackled as part of future CEER work programmes.
<ul style="list-style-type: none"> • Network tariff design 	<ul style="list-style-type: none"> • This is recognised as a key regulatory tool.
<ul style="list-style-type: none"> • Carbon pricing 	<ul style="list-style-type: none"> • CEER recognises the importance of carbon pricing and will take it into account in CEER reports but design of emissions trading schemes is beyond the scope of regulators.
<ul style="list-style-type: none"> • Unbundling issues 	<ul style="list-style-type: none"> • This is dealt with as part of the topic of well-functioning markets and CEER is reiterating its position that unbundling rules must be respected to ensure a

	level playing field for all market participants.
<ul style="list-style-type: none"> Liquidity issues 	<ul style="list-style-type: none"> This is dealt with as part of the topic of well-functioning markets.
<ul style="list-style-type: none"> Grid technology uptake 	<ul style="list-style-type: none"> CEER works to ensure that the best technologies are taken up by its technology-neutral stance and follows the principle that all technologies should compete on equal terms.
<ul style="list-style-type: none"> Cyber security 	<ul style="list-style-type: none"> This will be addressed by the core area of well-functioning markets and the topic of digitalisation. Suitable rules to protect against cyber security risks are a topic for CEER's work.
<ul style="list-style-type: none"> Regulatory best practices 	<ul style="list-style-type: none"> This is a role for CEER by the nature of its organisation, prior to this strategy document.
<ul style="list-style-type: none"> Decarbonised heating 	<ul style="list-style-type: none"> CEER sees decarbonised heating as part of energy system integration and has clarified this.

The feedback received has been very useful in helping CEER to fine-tune its strategy. However, some very detailed elements of the stakeholder feedback cannot be considered in the scope of a strategy document and often were very specific questions about CEER positions that can be found in other CEER documents. Some suggestions were beyond the scope of regulators, as is noted in a few cases above. A few stakeholders looked for things in CEER's strategy that CEER feels are more appropriate to an annual work-programme document.

The comments received in response to this consultation are reflected, as appropriate, in the final CEER 2022-2025 strategy and will be considered indirectly in the development of the draft 2022 work programme (which will have its own public consultation).