

**CEER**

**Council of European  
Energy Regulators**



Fostering energy markets, empowering **consumers**.

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**Draft CEER 3D Strategy and  
CEER 2019 Work Programme  
Public consultation document**

**Ref: C18-WPDC-30-03**

**5 June 2018**

## INFORMATION PAGE

### Abstract

On 5 June 2018, CEER launched a public consultation on the draft CEER 3D Strategy and related CEER 2019 Work Programme (Ref. C18-WPDC-29-05). This document outlines the overall policy strategy for European energy regulators from 2019 to 2021, with the aim of benefitting Europe's energy consumers in a changing sector. Together with the strategy, CEER consults on the concrete items to deliver the strategy during 2019 as outlined in the draft of CEER's Work Programme for the year.

### Target audience

Energy suppliers, traders, electricity and gas customers, industry, consumer representative groups, network operators, Member States, academics and all other interested parties.

### How to respond to this consultation

Deadline: **10 August 2018**

This public consultation is carried out through a dedicated [online questionnaire](#) on the website of the Council of European Energy Regulators (CEER). No login is required.

- A) To establish an effective consultation process, CEER collects and uses the personal data (name and email address) of individuals and stakeholders who have an interest in or are affected by the proposals and reports developed by CEER.
- B) Personal data is used for the purposes of sharing with you, documents and reports, so that we can invite your feedback.

If you have any queries relating to this consultation process, please contact the CEER Secretariat: Tel. +32 (0) 2788 73 30, Email: [brussels@ceer.eu](mailto:brussels@ceer.eu)

### Treatment of confidential responses

In the interest of transparency and in accordance with the General data Protection Regulation (GDPR):

- i. will list the names of the organisations that have responded but anonymise the personal data of any individual (such as members of the public) that has contributed.
- ii. requests that any respondent who does not wish their contribution to be published, to indicate this preference when submitting their response via the online questionnaire. CEER will publish all responses that are not marked confidential on the website: [www.ceer.eu](http://www.ceer.eu)

This CEER public consultation is carried out in line with the Guidelines on [CEER's Public Consultation Practices](#).

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# 3D

DIGITALISATION  
DECARBONISATION  
DYNAMIC REGULATION

## FOREWORD

This consultation paper provides the Council of European Energy Regulators (CEER)'s proposed 3-year strategy for the period 2019-2021, along with our related draft 2019 Work Programme deliverables, for public comment.

In this paper, we seek your views on how best to foster energy markets and protect and empower consumers in a changing energy system, in a way that benefits all energy consumers. Our members, Europe's national energy regulators, have a broad range of responsibilities from granting access to energy networks to setting market rules at wholesale and retail level so that competition and innovation thrives, with their primary duty being to ensure well-functioning markets in order to protect consumers. CEER, as a collective of European national regulators, has developed a "3-year, 3-D" regulatory policy strategy covering:

- Digitalisation: Drive forward a new deal for consumers in a digital world (D1);
- Decarbonisation at least cost (D2); and
- Dynamic regulation: European solutions for adaptive regulation in a fast-changing world (D3).

In the context of technological developments that are disrupting the traditional market sectoral approach on which regulatory supervision is based, we are reflecting on how to steer and regulate an energy sector undergoing significant change, from decarbonisation to new innovations such as customer-friendly digital energy services or a mass roll-out of electric vehicles. These changes offer both opportunities and challenges. Hence, we are determined as energy regulators to anticipate changing environments and guide them, to facilitate competition that benefits active energy consumers whilst protecting the more vulnerable in our society. In this context we are consulting on European energy regulators' strategic policy objectives against each of the Ds, as well as on the draft CEER annual Work Programme to implement our strategy in the first of its 3 years (2019).

As part of our 3D strategy, CEER will continue our successful close cooperation with ACER (an EU Agency), and our respective work complements and strengthens one another. ACER has a legislative mandate and responsibilities related to Europe's Internal Energy Market (IEM). CEER, as a collective of European national regulators, has the freedom to propose bold visions for the future, which stem from national experiences and best practice. CEER's National Regulatory Authorities (NRAs) are also on the frontline of delivering the IEM in important areas where ACER does not have a mandate such as retail markets and distribution systems, and in terms of implementing and enforcing EU-wide rules nationally. Our experiences shared and nourished within CEER help inform the policy cycle and ultimately help Europe's national energy regulatory authorities and ACER in working for the energy consumer.

We value your feedback in the exciting period ahead.

Garrett Blaney  
CEER President

## 1. INTRODUCTION

In this paper, CEER, the independent association representing 36 European energy regulators, is publicly consulting on a “3D” policy strategy for 2019 to 2021. This is with a view to the energy sector transition delivering a beneficial new deal for all of Europe’s energy consumers under the following “Ds”:

- Digitalisation: Drive forward a new deal for consumers in a digital world (D1);
- Decarbonisation at least cost (D2); and
- Dynamic regulation: European solutions for adaptive regulation in a fast-changing world (D3).

The 3-year/3D policy strategy, explained in section 2, outlines for each of the Ds the potential opportunities, challenges and strategic objectives for European energy regulators across the 2019 to 2021 period. It is intended that this strategy guides CEER’s deliverables and activities for implementation through its annual Work Programmes up to 2021.

This paper also includes the related draft 2019 CEER Work Programme, which is based on the 3D strategy objectives, as explained in section 3.

CEER believes in public consultation and is therefore seeking public feedback on both our 3D strategy and the items in the draft 2019 Work Programme, prior to finalisation of both.

### Public consultation

We invite comments on the draft CEER 3D strategy and CEER 2019 Work Programme **by 10 August 2018**.

Stakeholders are invited to participate in the public consultation via a dedicated online questionnaire in the [public consultation section](#) of the CEER website. Please note that only answers submitted via the online questionnaire will be taken into consideration.

For more information about CEER and our work, please visit our website at [www.ceer.eu](http://www.ceer.eu).

## 2. DRAFT CEER 3D STRATEGY

The following general principles have informed CEER's approach and will guide the implementation of our strategy, as described in the 3Ds below:

- Clarify the respective role of all parties involved (NRAs, European Commission, European Networks for Transmission System Operators (ENTSOs), ACER) and improve the articulation between European decision-making and regional and national implementation, to avoid regulatory gaps.
- Act national, think European by identifying common approaches and appropriate level of voluntary design standardisation to combine European coherence and national specificities.
- Make full use of the international dimension of CEER to reinforce the "knowledge-based" aspect of the work, by extending opportunities to incorporate external inputs into our work and to share our own expertise externally.
- Take a whole-system approach to mirror the development that sectors are increasingly growing together and becoming more dependent on each other.
- Build on our cooperation with other sectoral regulators, agencies, data protection authorities, ombudsmen and consumer protection authorities, etc. through our Partnership for the Enforcement of European Rights (PEER) initiative.
- Anticipate issues, so that the regulatory framework is not a barrier and that consumer protection evolves.

### **D1. Digitalisation: Drive forward a new deal for consumers in a digital world**

Digitalisation is driving changes for the whole economy, including the energy sector. By 2030, new business models and technology will probably have changed the energy retail markets fundamentally.

Consumer markets are increasingly intertwined: products and services are delivered in combination, software is embedded in products and more and more devices are connected to the internet. Ever-growing complexity means that the traditional sectoral responses need to be reviewed to ensure that regulation is updated to provide adequate protection and supervision, avoiding regulatory uncertainties and enforcement gaps.

Digitalisation can also provide cost saving opportunities in the whole system by facilitating energy efficiency and demand response, better integrating the market with pan-European platforms and optimising network operations and costs (flexibilities, predictive maintenance, etc.).

CEER is working to ensure the change is for the better with competition, efficient use of resources, new offers and services, and consumers that are empowered to benefit from developments while still adequately protected. More specifically, consumer empowerment is a prerequisite for well-functioning markets, and it is necessary that energy issues are understandable, affordable and fair. Competition and information are key features to facilitate prosumers while efficient and competitive markets in general enable consumer confidence and participation in the market. This way, we will continue to champion competition to the benefit of consumers and apply a consumer focus to all of CEER's work.

### **Opportunities:**

- Facilitate new business models as part of a flexible energy system, leveraging an information technology driven energy market, for example smart grids, new services to consumers, more internet-based business models.
- Make full use of the possibilities offered by new technologies to improve the energy system efficiency e.g. encourage network cost reduction through better use of data if Distribution System Operators (DSOs) have a better understanding of the rate of utilisation of their systems.
- Improve management of peak demand and its consequences on network investment.
- Facilitate consumers' active involvement, and ensure accountability of service providers.
- Facilitate the move towards pan-European markets.

### **Challenges:**

- Ensure consumer rights protection is fit-for purpose given new market paradigms (data privacy, contract laws...) with consumer-centric regulation.
- Effective regulatory oversight of cross-cutting issues with other sectoral authorities and new market models (block chain, bundled products...).
- Cybersecurity: helping to identify and manage the potentially increased threat to security of supply, market manipulation and data protection associated with digitalisation (and decentralisation) in the sector.
- Identify and mitigate risks associated with those consumers who may be "left behind", as not all innovative services, devices, etc. are accessible to, or wanted, by all.
- In order to keep up with innovation and the global trend of digitalisation, regulators must be ready to allow new interpretations of their regulatory work and changes in the regulatory framework.

### **CEER's Strategic Objectives:**

- Foster a competitive European energy market and empower consumers to engage in energy markets, in the new framework of increasing digital and inter-linked markets.
- Ensure consumer protection and non-discrimination by setting common standards championing consumers' interests and empowerment, and contributing an energy market perspective to the European Commission's proposed "New Deal for Consumers" and revision of the general EU consumer law.
- Make digitalisation a cost-saver for the whole energy system.
- Ensure that the regulatory framework enables new business models to develop, so that the energy market can fully benefit from technological innovation and developments while ensuring a level playing field.
- Strengthen cooperation with other sectoral authorities, consumer protection authorities, etc. to support NRAs' understanding of the new opportunities and challenges (disruptive business models, cybersecurity, shared economy, circular economy...) and ensure consumers are protected as traditional energy markets are reinvented, notably through our PEER initiative.

## **D2. Decarbonisation at least cost**

The climate agenda and “Clean Energy” objectives are major policy drivers for change in the energy sector through:

- 1) the development of renewable energies and green mobility;
- 2) the improvement of energy efficiency; and
- 3) the CO<sub>2</sub> prices via a reform of the Emissions Trading Scheme (ETS) and various other schemes (carbon taxes, carbon floors, etc.) which give a signal to the market in relation to the internalisation of CO<sub>2</sub> emissions costs.

Energy regulators aim to remove all possible obstacles to allow an efficient and least-cost decarbonisation of the EU energy system. To this end, we will continue to work to promote flexibility and to integrate renewables fully into the market and the grid. We will also consider their impact on market design and implement appropriate regulatory models, while also taking account of the role that gas can play in achieving cost-effective energy decarbonisation. This should be done efficiently, fairly, and consistent with international objectives.

We emphasise promoting decarbonisation at least cost. Cost-efficient decarbonisation needs a cross-sectoral and whole system (electricity and gas) approach, keeping in mind all aspects: wholesale, networks, retail and potential impacts on infrastructure development.

CEER has a key role to play in creating and nourishing the debate at EU level by sharing experiences and best practices across the EU but also internationally, to provide market-based solutions.

### **Opportunities:**

In addition to significant environmental benefits, decarbonisation policies offer many positive effects:

- Ensure adequate system resilience and security of supply by reducing consumption and diversification of energy sources.
- Facilitate innovation and industry development, new business opportunities.
- Improve energy efficiency.
- Increase in people’s involvement in the energy system through local energy production.

### **Challenges:**

- Manage the penetration of renewable energies in the market, their impact on network designs and their technical functioning (variability, reverse flows, etc.) to ensure adequate security of supply.
- Provide for an effective regulatory oversight and new regulatory approaches for a fast-growing diversity of new market models, business models and market actors.
- Steer efficient investment in a context of low-price wholesale energy markets with a market-based approach, in order to best manage risk.
- Adopt a whole system approach to minimise consumers’ bills.
- Take decisions in a context of major uncertainty and adapt to different market circumstances, notably the role of gas, the share of green gas, electricity storage advances, the electrification of transport and future trends of green mobility and other technological developments, as yet unforeseen.



### **CEER's Strategic Objectives:**

- Integrate (fully) renewables in all segments (retail, wholesale and networks).
- Effectively and fairly manage the transition towards a low carbon energy system.
- Facilitate decarbonisation at least cost by two means:
  - Develop an energy market design with a minimal level of subsidy mechanisms (including cross subsidies and indirect schemes); and
  - Optimise the whole energy system cost to achieve decarbonisation at least cost, taking account of both gas and electricity, while maintaining a high level of security of supply.
- Build consumer confidence in the market by ensuring all consumers benefit in a fair way, notably through the efficiency of the network tariff, and promote the participation of consumers without discrimination between consumers/prosumers.

### **D3. Dynamic Regulation: European solutions for adaptive regulation in a fast-changing world**

While energy regulators are not the advent of digitalisation technologies and decarbonisation policies, they can be enablers of the subsequent adaptation of the energy regulatory framework and its implementation. CEER sees that regulation must be stable, but not static. Regulation must adapt to market evolutions. Europe's energy regulators are determined to make regulation coherent with the fast-changing environment that digitalisation and decarbonisation bring about, whilst continuing to protect the European energy consumers' interests effectively.

Dynamic regulation refers to:

- 1) full and coherent implementation in practice of the legislative and regulatory framework in the European Union;
- 2) an appropriate oversight to ensure trust in the market; and
- 3) a strong link between the evolution of the energy sector and regulatory implementation by developing future-proofed European solutions.

Regulators will reflect on how to regulate an industry/network with potentially continuing reduced energy volumes and throughput, on how to move from static regulation to more dynamic regulation, and on how to regulate infrastructure for different purposes. This will mean increasing flexibility for market participants, so that they can incorporate future developments, while maintaining regulatory predictability. We will seek to implement a future-proofed regulatory framework that allows market forces and regulated entities to deliver the energy transition and digitalisation and to achieve energy efficiency targets as well as security of supply (for example, providing attractive investment signals in a market where renewables account for a large share of power production).

### **Opportunities:**

- Enhance the importance of sharing and bottom-up/horizontal approaches, and innovation for regulators.
- Achieve a smooth-running energy market, to foster business opportunities and promote better competition in the interest of consumers.
- Develop and implement adaptive regulation.

## Challenges:

- Reconcile smart and flexible regulation with necessary accessibility, stability, predictability and visibility for market actors – particularly in terms of infrastructure development – accounting for differences in resources and know-how in the Member States, as well as cultural and local differences.
- Ensure effective regulation of simultaneously-occurring EU integration and decentralisation movements by offering European solutions.
- Avoid undue stranded costs in infrastructure development being supported by consumers.
- Ensure that regulatory models (e.g. tariff design, cost recovery) can adapt to the energy transition, the unprecedented availability of data, the arrival of new actors, the changing relationships and interfaces for consumers, local and national circumstances, etc.
- Reconcile potentially diverging developments like low wholesale prices and development of new investments or flexibilities.

## CEER's Strategic Objectives:

- Implement a coherent and adaptive regulatory framework for European solutions in electricity and gas. This will mean finding the relevant levels (regional regulation/local implementation, etc.) and the optimised balance as for flexibility versus stability.
- Design effective regulatory oversight and new regulatory approaches for a fast-growing diversity of new market models, business models and market actors, which an intelligent use of data, respectful of privacy principles, can facilitate and accelerate.
- Support strong, independent and efficient regulation through an appropriate level of resources for NRAs and ACER as key for dynamic regulation and market actors' trust in the market.

## 3. DRAFT CEER 2019 WORK PROGRAMME

In addition to consulting on CEER's 3D strategy, we are seeking views on the related CEER 2019 Work Programme (the first year of our 3-year, 3D strategy).

The proposed work items for the 2019 Work programme are derived from the 3D strategy. In the table of 2019 deliverables below, each proposed work item appears under the area of the 3D strategy that we consider to be of principal relevance although in many cases work items may also impact on other areas of the strategy. Since we are consulting on both the 3D strategy and the draft Work Programme, it may be that the draft Work Programme will need to be amended to reflect comments received during the consultation on both the 3D strategy and on the draft Work Programme itself.

In 2019, we intend to prioritise work on protecting and empowering European consumers as we have in previous years. We seek to enable all consumers to obtain the full benefits of a competitive and a fully functioning Internal Energy Market whilst enjoying appropriate levels of protection. We intend to prepare a status report and a market monitoring report which will assist in analysing progress towards a well-functioning retail market. We will also examine issues associated with the potential introduction of dynamic prices for consumers included in the Clean Energy Package.

We will continue our work on the developing role of DSOs and, in particular how digitalisation and decarbonisation will affect distribution networks and their operation, including in relation to the use of flexibility. We will examine how regulation could develop in a dynamic way to keep pace with the changing role of DSOs.

We will further develop our work on the future role of gas (drawing from our recent Future Role of Gas (FROG) study) in the market and how regulation should develop to assist necessary innovation. We will also deepen our PEER initiative which establishes a vehicle for encouraging cross-sectoral, cross-authority cooperation across a number of policy areas.

CEER works to enhance the capability of energy NRAs to fulfil effectively their individual responsibilities for achieving a competitive, sustainable and secure energy market in Europe. Our international work will play an important role in this regard.

CEER will maintain its role in providing positive inputs to policy makers during 2019 on current and anticipated initiatives including the Clean Energy Package, the revision of the Gas Directive, the New Deal for Consumers and the Cyber Security Act. We will follow-up on existing initiatives such as Local Energy Communities. CEER will undertake important monitoring and benchmarking work across a range of areas.

### 3.1 DRAFT CEER WORK ITEMS FOR 2019

No	Sector	Title	Description	3D Strategy	Expected start time	Expected end time
1	Consumers and retail markets	Status Review with a focus on the gap-analysis for the Roadmap to 2025 for Well-Functioning Retail Energy Markets	In 2018 CEER is preparing a Status Review on the progress of the self-assessment by NRAs based on CEER's Roadmap to 2025. In order to achieve the ambitions for well-functioning retail markets in 2025, CEER will monitor progress and highlight advances on a regular basis. CEER will therefore follow up with a new Status Review in 2019 to be published in 2020.	Dynamic Regulation	Q1 2019	2020
2	Consumers and retail markets	ACER/CEER Market Monitoring Report on Consumer Empowerment and Protection Chapter	The ACER/CEER Market Monitoring Report on Consumer Empowerment and Protection is an annual report to describe the trends in European energy markets. With the finalisation of the Clean Energy Package, new legal requirements add to an already successfully established list of empowerment and protection mechanisms for European electricity and gas consumers. The report will monitor new developments providing a European perspective on national transpositions. Furthermore, the report aims to provide new detailed insights into European energy markets by exploring additional dimensions such as those identified in the CEER Roadmap to 2025 for Well-Functioning Energy Markets or by investigating more closely the relationships between consumer empowerment and retail market properties.	Dynamic Regulation	Ongoing	Q4 2019
3	Consumers and retail markets	Retail Market Monitoring Report	CEER will continue to develop its activities relating to the monitoring of retail markets on the basis of CEER National Indicators. It will take into account the results of work on indicators and metrics from the Roadmap to 2025 for Well-Functioning Retail Energy Markets as well as monitoring related developments on European level (e.g. as a result of the Clean Energy Package).	Dynamic Regulation	Q1 2019	Q4 2019
4	Consumers and retail markets	Recommendations on Dynamic Price Implementation	The European Commission has proposed legislation on dynamic prices in the Clean Energy Package. The Report will investigate potential implementation barriers, outline good practices and make recommendations on regulation. It may also make recommendations on how individual NRAs should monitor the effect of dynamic prices in the market on consumer benefits.	Digitalisation & Dynamic Regulation	Q1 2019	Q4 2019
5	Gas	Status Review on Regulating Innovation in the gas sector	Innovation plays an important role in the improvement of the environmental and economic efficiency of energy systems, in particular in the transition to a decarbonised energy system. Innovation can cover different aspects in terms of system management and technological improvements. The aim of the Status Review is to review different innovation regulatory schemes for gas networks, taking into account the different dimensions of innovation, as well as the scope for innovation and regulatory frameworks that support it in other parts of the European gas industry.	Decarbonisation & Dynamic Regulation	Q1 2019	Q4 2019

No	Sector	Title	Description	3D Strategy	Expected start time	Expected end time
6	Gas	Report on Gas Infrastructures and the Energy transition: An analysis of needs and economic evaluation of investments	Expected developments of the European energy system can give various roles to gas infrastructures. The objective of the report will be to analyse the infrastructure needs and their economic value according to several parameters and dimensions including the interaction between transmission and distribution with the development of decentralized production, the potential co-optimisation of electricity and gas systems, the remaining role of fossil gas and its effect on transmission and interconnections. The objective is to propose recommendations about the TYNDP development (adaptation of the current evaluation of infrastructure needs), the assessment of benefits provided by new projects (including risk evaluations) and the selection of projects of common interest.	Decarbonisation	Q1 2019	Q3 2019
7	Electricity	Report on Investment Signals with increasing RES penetration	With the further increasing penetration of renewable energy with low variable costs, and the support to the investments costs of new, emerging technologies, the current price observed on organised market places may often not allow producers to recover their investment costs without additional source of revenues. The capability of wholesale energy markets as they are currently designed to provide economic signals capable of ensuring appropriate perspectives of cost recovery to new assets and, hence, of triggering investment decisions, is not guaranteed. The report aims to analyse to what extent this statement is correct and whether there are market design options available to resolve this issue if needed.	Decarbonisation	Q3 2018	Q3 2019
8	Electricity	Benchmarking Report on Power Losses	CEER will update the 2017 CEER Report on Power Losses. The report will benchmark the level of network losses in European countries and identify different national practices regarding the definition and calculation of such losses.	Dynamic Regulation & Decarbonisation	Q3 2018	Q3 2019
9	Cross-sectorial	Report on Investment Conditions 2019	In 2019, CEER will publish the 8th edition of the Report on Investment Conditions. The Annual Report provides a brief description of each member states' regulatory regime for networks. A new chapter enables readers to better understand how the figures presented in the report are created and implemented. This report allows comparisons of investment conditions for networks across European countries. The report still provides a general survey about the implemented regulatory regimes, the required efficiency developments and analyses the overall determination of capital costs.	Dynamic Regulation	Q1 2019	Q4 2019
10	Cross-sectorial	7th CEER Benchmarking Report on Quality of Electricity and Gas Supply	Periodic full update of the Benchmarking Report on the Quality of Electricity and Gas Supply. The report is a key reference document used to assess the performance of energy systems.	Dynamic Regulation	Q2 2019	2020

No	Sector	Title	Description	3D Strategy	Expected start time	Expected end time
11	Cross-sectorial	Paper on Smart Economic Regulation of DSOs	CEER will provide further guidelines on dynamic economic regulation. Given that the energy transition brings rapid changes to the operating environment for DSOs, CEER will explore how this can be taken into account in regulatory approaches. Examples of aspects that could be covered are: an assessment on the performance of DSOs when ex-ante regulation is applied during multi-year periods; updating methodology parameters according to market conditions; comparing flexibility tests vs. investments tests (in the short- and long-term) to avoid sunk costs; and investments and smart solutions included in the RAB, OPEX or TOTEX when these would come in operation.	Dynamic Regulation & Digitalisation	Q1 2019	Q4 2019
12	Cross-sectorial	Report on Digitalisation and the DSO	CEER will prepare a Report on how digitalisation will change the way DSOs act. There will be a customer focus to this report, though not exclusively so. What can NRAs expect from DSOs with more digitalisation, e.g. real time network management? What data should be provided to third parties (access to data), e.g. consumption data or technical data? What data governance is in place?	Digitalisation	Q1 2019	Q4 2019
13	Cross-sectorial	Report on Decarbonisation Developments in the DS Grid	A position paper describing the development in the energy systems and how this affects the distribution system. The developments encompass the likely reinforcement of electricity grids due to electrification, the short and long term usage of natural gas grids and the position of gas during the energy transition, the potential of hydrogen, the interaction with heat and the creation of Local Energy Communities. The developments in those grids require NRAs to rethink what a fair distribution of costs would be, for example on how costs of stranded assets would be included in tariffs when customer numbers/usage is declining in light of decarbonisation. This could include further thinking on the whole system approach.	Decarbonisation & Dynamic Regulation	Q1 2019	Q4 2019
14	Cross-sectorial	Report on Procedures of Procurement of Flexibility	This report would provide further insights in a baseline report/guidelines on how the flexibility procurement procedures could be arranged to reach an efficient outcome and how incentives are given in regulation to DSOs to use flexibility. This also would include TSO-DSO interaction on the procurement of flexibility, e.g., on TSOs contracting flexibility of actors connected to the DSO grid. It could also include a case study on storage. The goal of the report would be to give an idea of the state of play prior to the implementation of the CEP and explore if there are already some best practices to highlight.	Digitalisation & Decarbonisation & Dynamic Regulation	Q4 2018	Q3 2019

No	Sector	Title	Description	3D Strategy	Expected start time	Expected end time
15	Cross-sectorial	Partnership for the Enforcement of European Rights (PEER) - Report on national models of cooperation among different sectoral regulators in the context of consumer law enforcement	In the framework of our ongoing PEER work and the new requirements of the Consumer Protection Cooperation Regulation (CPC), CEER will in 2019 - Identify existing cross-sectoral cooperation models at national level by collecting some case studies of how such cooperation has worked so far (e.g. memorandum of understanding between sectoral regulators, protocols for dealing with overlapping jurisdictional issues, national networks of economic regulators etc.), - Explore which fields at the margins of energy regulation are likely to require regular or closer interaction with other sector regulators in the future, in particular in the context of the requirements on national consumer protection authorities to cooperate with sectoral regulators under the CPC Regulation (effective from 2020).	Dynamic Regulation	Q1 2019	Q4 2019
16	Cross-sectorial	Partnership for the Enforcement of European Rights (PEER) - Bundled Products Regulatory Roundtable	In the framework of our PEER initiative (which seeks to strengthen cross-sectoral cooperation between different authorities, across sectors, responsible for protecting consumer rights), CEER will organise a follow-up workshop on bundled products. This builds upon the 2017 workshop on bundled products which gathered regulators from different sectors (e.g. telecoms, energy, consumer protection authorities, ombudsmen) and on our 2018 PEER guide on bundled products.	Dynamic Regulation	Q1 2019	Q1 2019
17	Cross-sectorial	Partnership for the Enforcement of European Rights (PEER) - Cyber Security Regulatory Workshop	With increased digitalisation, cyber security is an increasing concern. In the framework of our PEER initiative, CEER will bring together relevant experts for a workshop on cyber security to enhance our shared learning on trends and challenges.	Digitalisation & Dynamic Regulation	Q2 2019	Q2 2019

## 4. QUESTIONS FOR CONSULTATION

The purpose of this public consultation is to provide transparency on our strategy and future work and to seek valuable feedback from stakeholders. The present document will be open for public consultation **until 10 August 2018**.

This public consultation is carried out through a dedicated [online questionnaire](#) on the CEER website. No login is required.

In particular, as referred to in the questionnaire, we are interested in views on both the 3D strategy and on the proposed 2019 deliverables:

- Questions on 3D strategy (see section 2 above):
  1. To what extent have we captured the key ongoing and anticipated trends and challenges as part of the changing energy system?
  2. To what extent do our proposed strategic objectives protect and empower consumers in light of the identified opportunities and challenges?
  3. Please indicate if you identify any missing objective on which regulators should focus.
- Questions on the individual deliverables (listed in section 3 above of this paper):
  - Does each work item contribute to the achievement of CEER's 3D strategy?
  - Please indicate the deliverables you consider as "very important", "important" or "not important".
  - For the deliverables with public consultations, public hearings, workshops etc. do you intend to actively participate?
  - Do you have any specific comments on any of the individual deliverables?
  - Are there (other) deliverables that CEER should include in or exclude from the 2019 Work Programme?

## 5. NEXT STEPS

Following a review of the comments received to this consultation, CEER aims to publish its final 3D Strategy by Q4 2018 and the 2019 Work Programme in January 2019.



## About CEER

The Council of European Energy Regulators (CEER) is the voice of Europe's national regulators of electricity and gas at EU and international level. CEER's members and observers from 36 European countries are the statutory bodies responsible for energy regulation at national level.

CEER's key objective is to facilitate the creation of a single, competitive, efficient and sustainable European internal energy market that works in the consumer interest. CEER actively promotes an investment-friendly and harmonised regulatory environment, and consistent application of existing EU legislation. Moreover, CEER champions consumer issues in our belief that a competitive and secure European energy market is not a goal in itself, but that it should deliver benefits for energy consumers.

CEER, based in Brussels, deals with a broad range of energy issues including retail markets and consumers; distribution networks; smart grids; flexibility; sustainability; and international cooperation. European energy regulators are committed to a holistic approach to energy regulation in Europe. Through CEER, NRAs cooperate and develop common position papers, advice and forward-thinking recommendations to improve the electricity and gas markets for the benefit of residential consumers and businesses.

More information is available at [www.ceer.eu](http://www.ceer.eu)