

Coastal and Marine Union (EUCC) Preliminary Comments on CEER Discussion Paper

The [CEER discussion paper 2020 vision for Europe's energy customers](#) (CEER discussion paper) is intended to be basis for discussion, and to provide some answers to a series of questions:

1. What do customers want from the energy market – and what are their priorities?
2. What are the future changes – challenges and opportunities – that customers will face?-
3. How should these be addressed? What good and bad practices already exist in your region that can be shared? Do you have novel ideas on how to address these issues going forward?
4. Are the concrete actions we envisage adequate to facilitate discussion and awareness of the development of EU energy policy? What other initiatives could be helpful?

Please find attached the preliminary comments of the Coastal and Marine Union (EUCC) on the CEER discussion paper. EUCC welcomes the opportunity to provide further comment on this discussion paper, and to participate in the Forum on 13-14 November 2012, as well as other CERR processes. EUCC has previously been engaged on discussions and consultations on EU's internal energy market and regulation, marine renewable energy and offshore energy infrastructure, and climate adaptation and mitigation issues with respect to energy, water, coasts and oceans.

The CEER discussion paper identified four key areas on which to focus: 1) Affordability, 2) Simplicity, 3) Reliability, and 4) Protection and empowerment. EUCC suggests that fifth key area be considered, which is "5) Social Acceptance". This additional key area can incorporate non-economic concerns of energy customers, and is discussed further below.

Further, under the CEER discussion paper, customers are defined as follows:

For the purposes of the vision, customers are defined as the European retail customers of electricity, gas and district heating, as well as those that both generate and consume electricity. Customers can be a household customer or a small enterprise. We are focusing in particular on very small businesses, who are in many ways similar to household customers in their engagement with energy markets. Large energy customers are not considered in this initiative. For the first time, CEER will now include district heating in our customer perspective.

For the purpose of this vision, EUCC agrees with the definition of customers as households and small businesses. Further, the discussion paper states:

CEER's commitment is to engage far more actively in securing the views of customers and their representative bodies on what customers want and expect so that they can have trust in a market that will meet their needs. This commitment extends to CEER exploring ways to help build capacity and expertise in energy issues within consumer organisations. Conversely, suppliers and energy service providers should retain these considerations uppermost in their strategies, as they develop new and innovative tariffs and services. In order to facilitate the dialogue therefore, our vision will be

developed into a number of quite specific actions for regulators, customer bodies and policy makers as they engage in energy customer issues. ...

Generally speaking, it is our experience that the customers expect affordable energy, reliable energy and for it to be simple to manage and understand. Customers also expect to be empowered and protected. We assume that these expectations will probably be relevant also in the future, even though the context will somewhat differ.

Similarly to its earlier comment, EUCC finds that the definitions of consumer organisations to be too narrow, and seemingly limited to representing only narrow economic interests of these classes of customers. As such, this definition limits and precludes the opportunity for other customer organisations to assist CEER in the process of developing social acceptance for EU, national and local energy customer initiatives.

EUCC would also recommend the inclusion of broader social acceptance concerns of energy customers including: the type, mechanisms and infrastructure for energy generation, transmission and distribution; and the impacts of energy on local culture and customs, environment, and climate adaptation and mitigation; individual privacy concerns (for example, privacy concerns with smart grid applications); and other issues of specific and local concern. Furthermore, there should be mechanisms and processes to include the participation of broader customer organizations - including civil society organizations at all levels- to address social acceptance concerns.

The EU's experience with marine renewable energy and infrastructure can be considered as an example. The European grid infrastructure, particularly in the offshore, needs to be expanded and upgraded to enable the transformation of the power sector and the integration of a large share of renewable energy sources consistent with the European carbon reduction and energy security targets. It is not clear how to implement the necessary infrastructure in an efficient and effective way, with one key challenge and opportunity being local, national European concerns arising from environmental and social concerns related to grid infrastructure projects.

In order to address these concerns, the [European Grid Declaration on Electricity Network Development and Nature Conservation in Europe](#) was developed in 2011. The declaration allows transmission operators and non-governmental organization to work together to expand the energy grid and at the same time addressing local concerns, assist with ensuring social acceptance and protect nature. This declaration provides an excellent model of best practices for engagement by energy customers and representative customer organizations.

Lastly, EUCC would also commend the inclusion of district heating in the consideration of energy, and would recommend that implications of different energy choices for water also be considered.

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