



## Welcome to the CEER Public Consultation on draft 3D Strategy and CEER 2019 Work Programme.

### Section A: Contact details and 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.

**A1. Contact details:Name**

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**A2. Contact details:Organisation**

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**A3. Contact details:Email**

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**A4. Please, mark the box if you wish your response to be treaded as confidential.**

*We will not make your feedback available to the general public. But we will use it as part of the analysis.*

Tick the  
box

If you wish your reponse to be treated as confidential

☐



## Section B: Questions on 3D Strategy

- B1. 1. To what extent have we captured the key ongoing and anticipated trends and challenges as part of the changing energy system?**

- B2. 2. To what extent do our proposed strategic objectives protect and empower consumers in light of the identified opportunities and challenges?**

- B3. 3. Please indicate if you identify any missing objective on which regulators should focus.**



## Section C: Questions on the individual deliverables

In total, there are 18 deliverables proposed in the draft CEER 2019 Work Programme divided into several sectors - Consumers and retail markets, Gas, Electricity and Cross-sectorial. CONSUMERS AND RETAIL MARKETS

GAS

ELECTRICITY

CROSS-SECTORIAL

PLEASE, DO NOT SUBMIT THE EMPTY QUESTIONNAIRE.

Click on EXIT in the top right-hand corner!

Thank you!

### C1. Deliverable 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**

#### **Description:**

**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.**

**3D Strategy: Dynamic Regulation**

**Timing: Q1 2019 - 2020**

**a) Please indicate if you consider this deliverable as "Very important", "Important" or "Not important".**

Very important ☐

Important ☐

Not important ☐

### C2. b) Do you think this work item contributes to the achievement of CEER's 3D strategy?



**C3. c) Do you intent to actively participate in consultation, hearing, workshop, etc. if organised for this deliverable?**

Yes ☐

No ☐

**C4. d) Do you have any specific comment on this individual deliverable?**

**C5. Deliverable 2:**

**Consumers and retail markets: ACER/CEER Market Monitoring Report on Consumer Empowerment and Protection Chapter**

**Description:**

**The ACER/CEER Market Monitoring Report on Consumer Empowerment and Protection is a joint ACER/CEER Report to describe and analyse the implementation of propositions from the European legislative framework and emerging trends on 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 based on such legislation, 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.**

**3D Strategy: Dynamic regulation**

**Timing: Ongoing - Q4 2019**

**a) Please indicate if you consider this deliverable as "Very important", "Important" or "Not important".**

Very important ☐

Important ☐

Not important ☐



**C6. b) Do you think this work item contributes to the achievement of CEER's 3D strategy?**

**C7. c) Do you intent to actively participate in consultation, hearing, workshop, etc. if organised for this deliverable?**

Yes ☐

No ☐

**C8. d) Do you have any specific comment on this individual deliverable?**

**C9. Deliverable 3:**

**Consumers and retail markets: Retail Market Monitoring Report**

**Description:**

**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).**

**3D Strategy: Dynamic regulation**

**Timing: Q1 2019 - Q4 2019**

**a) Please indicate if you consider this deliverable as "Very important", "Important" or "Not important".**

Very important ☐

Important ☐

Not important ☐



**C10. b) Do you think this work item contributes to the achievement of CEER's 3D strategy?**

**C11. c) Do you intent to actively participate in consultation, hearing, workshop, etc. if organised for this deliverable?**

Yes ☐

No ☐

**C12. d) Do you have any specific comment on this individual deliverable?**

**C13. Deliverable 4:**

**Consumers and retail markets: Recommendations on Dynamic Price Implementation**

**Description:**

**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.**

**3D Strategy: Decarbonisation & Dynamic regulation**

**Timing: Q1 2019 - Q4 2019**

**a) Please indicate if you consider this deliverable as "Very important", "Important" or "Not important".**

Very important ☐

Important ☐

Not important ☐



**C14. b) Do you think this work item contributes to the achievement of CEER's 3D strategy?**

**C15. c) Do you intent to actively participate in consultation, hearing, workshop, etc. if organised for this deliverable?**

Yes ☐

No ☐

**C16. d) Do you have any specific comment on this individual deliverable?**



**C17. Deliverable 5:**

**Gas: Status Review on Regulating Innovation in the gas sector**

**Description:**

**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.**

**3D Strategy: Decarbonisation & Dynamic Regulation**

**Timing: Q1 2019 - Q4 2019**

**a) Please indicate if you consider this deliverable as "Very important", "Important" or "Not important".**

Very important ☐

Important ☐

Not important ☐

**C18. b) Do you think this work item contributes to the achievement of CEER's 3D strategy?**

**C19. c) Do you intent to actively participate in consultation, hearing, workshop, etc. if organised for this deliverable?**

Yes ☐

No ☐





**C20. d) Do you have any specific comment on this individual deliverable?**

**C21. Deliverable 6:**

**Gas: Report on Gas Infrastructures and the Energy transition: An analysis of needs and economic evaluation of investments**

**Description:**

**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.**

**3D Strategy: Decarbonisation**

**Timing: Q1 2019 - Q3 2019**

**a) Please indicate if you consider this deliverable as "Very important", "Important" or "Not important".**

Very important ☐

Important ☐

Not important ☐

**C22. b) Do you think this work item contributes to the achievement of CEER's 3D strategy?**



**C23. c) Do you intent to actively participate in consultation, hearing, workshop, etc. if organised for this deliverable?**

Yes ☐

No ☐

**C24. d) Do you have any specific comment on this individual deliverable?**

**C25. Deliverable 7:**

**Electricity: Report on Investment Signals with increasing RES penetration**

**Description:**

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.

**3D Strategy: Decarbonisation**

**Timing: Q3 2018 - Q3 2019**

**a) Please indicate if you consider this deliverable as "Very important", "Important" or "Not important".**

Very important ☐

Important ☐

Not important ☐



**C26. b) Do you think this work item contributes to the achievement of CEER's 3D strategy?**

**C27. c) Do you intent to actively participate in consultation, hearing, workshop, etc. if organised for this deliverable?**

Yes ☐

No ☐

**C28. d) Do you have any specific comment on this individual deliverable?**

**C29. Deliverable 8:**

**Electricity: Benchmarking Report on Power Losses**

**Description:**

**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.**

**3D Strategy: Dynamic Regulation & Decarbonisation**

**Timing: Q3 2018 - Q3 2019**

**a) Please indicate if you consider this deliverable as "Very important", "Important" or "Not important".**

Very important ☐

Important ☐

Not important ☐



**C30. b) Do you think this work item contributes to the achievement of CEER's 3D strategy?**

**C31. c) Do you intent to actively participate in consultation, hearing, workshop, etc. if organised for this deliverable?**

Yes ☐

No ☐

**C32. d) Do you have any specific comment on this individual deliverable?**



**C33. Deliverable 9:**

**Cross-sectorial : Report on Investment Conditions 2019**

**Description:**

**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.**

**3D Strategy: Dynamic Regulation**

**Timing: Q1 2019 - Q3 2019**

**a) Please indicate if you consider this deliverable as "Very important", "Important" or "Not important".**

Very important ☐

Important ☐

Not important ☐

**C34. b) Do you think this work item contributes to the achievement of CEER's 3D strategy?**

**C35. c) Do you intent to actively participate in consultation, hearing, workshop, etc. if organised for this deliverable?**

Yes ☐

No ☐



**C36. d) Do you have any specific comment on this individual deliverable?**

**C37. Deliverable 10:**

**Cross-sectorial : 7th CEER Benchmarking Report on Quality of Electricity and Gas Supply**

**Description:**

**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.**

**3D Strategy: Dynamic Regulation**

**Timing: Q2 2019 - 2020**

**a) Please indicate if you consider this deliverable as "Very important", "Important" or "Not important".**

Very important ☐

Important ☐

Not important ☐

**C38. b) Do you think this work item contributes to the achievement of CEER's 3D strategy?**

**C39. c) Do you intent to actively participate in consultation, hearing, workshop, etc. if organised for this deliverable?**

Yes ☐

No ☐



**C40. d) Do you have any specific comment on this individual deliverable?**

**C41. Deliverable 11:**

**Cross-sectorial : Paper on Smart Economic Regulation of DSOs**

**Description:**

**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.**

**3D Strategy: Dynamic Regulation & Digitalisation**

**Timing: Q1 2019 - Q4 2019**

**a) Please indicate if you consider this deliverable as "Very important", "Important" or "Not important".**

Very important ☐

Important ☐

Not important ☐

**C42. b) Do you think this work item contributes to the achievement of CEER's 3D strategy?**



**C43. c) Do you intent to actively participate in consultation, hearing, workshop, etc. if organised for this deliverable?**

Yes ☐

No ☐

**C44. d) Do you have any specific comment on this individual deliverable?**

**C45. Deliverable 12:**

**Cross-sectorial : Report on Digitalisation and the DSO**

**Description:**

**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?**

**3D Strategy: Digitalisation**

**Timing: Q1 2019 - Q4 2019**

**a) Please indicate if you consider this deliverable as "Very important", "Important" or "Not important".**

Very important ☐

Important ☐

Not important ☐

**C46. b) Do you think this work item contributes to the achievement of CEER's 3D strategy?**





**C47. c) Do you intent to actively participate in consultation, hearing, workshop, etc. if organised for this deliverable?**

Yes ☐

No ☐

**C48. d) Do you have any specific comment on this individual deliverable?**

**C49. Deliverable 13:**

**Cross-sectorial : Report on Decarbonisation Developments in the DS Grid**

**Description:**

**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.**

**3D Strategy: Decarbonisation & Dynamic Regulation**

**Timing: Q1 2019 - Q4 2019**

**a) Please indicate if you consider this deliverable as "Very important", "Important" or "Not important".**

Very important ☐

Important ☐

Not important ☐



**C50. b) Do you think this work item contributes to the achievement of CEER's 3D strategy?**

**C51. c) Do you intent to actively participate in consultation, hearing, workshop, etc. if organised for this deliverable?**

Yes ☐

No ☐

**C52. d) Do you have any specific comment on this individual deliverable?**



**C53. Deliverable 14:**

**Cross-sectorial : Report on Procedures of Procurement of Flexibility**

**Description:**

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.

**3D Strategy: Digitalisation & Decarbonisation & Dynamic Regulation**

**Timing: Q4 2018 - Q3 2019**

a) Please indicate if you consider this deliverable as "Very important", "Important" or "Not important".

Very important ☐

Important ☐

Not important ☐

**C54. b) Do you think this work item contributes to the achievement of CEER's 3D strategy?**

**C55. c) Do you intent to actively participate in consultation, hearing, workshop, etc. if organised for this deliverable?**

Yes ☐

No ☐



**C56. d) Do you have any specific comment on this individual deliverable?**

**C57. Deliverable 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**

**Description:**

**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).**

**3D Strategy: Dynamic Regulation**

**Timing: Q1 2019 - Q4 2019**

**a) Please indicate if you consider this deliverable as "Very important", "Important" or "Not important".**

Very important	<input type="checkbox"/>
Important	<input type="checkbox"/>
Not important	<input type="checkbox"/>



**C58. b) Do you think this work item contributes to the achievement of CEER's 3D strategy?**

**C59. c) Do you intent to actively participate in consultation, hearing, workshop, etc. if organised for this deliverable?**

Yes ☐

No ☐

**C60. d) Do you have any specific comment on this individual deliverable?**



**C61. Deliverable 16:**

**Cross-sectorial: Partnership for the Enforcement of European Rights (PEER) - Bundled Products Regulatory Roundtable**

**Description:**

**Partnership for the Enforcement of European Rights (PEER) - 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.**

**3D Strategy: Dynamic Regulation**

**Timing: Q1 2019 - Q1 2019**

**a) Please indicate if you consider this deliverable as "Very important", "Important" or "Not important".**

Very important ☐

Important ☐

Not important ☐

**C62. b) Do you think this work item contributes to the achievement of CEER's 3D strategy?**

**C63. c) Do you intent to actively participate in consultation, hearing, workshop, etc. if organised for this deliverable?**

Yes ☐

No ☐



**C64. d) Do you have any specific comment on this individual deliverable?**

**C65. Deliverable 17:**

**Cross-sectorial: Partnership for the Enforcement of European Rights (PEER) - Cyber Security Regulatory Workshop**

**Description:**

**With increased digitalisation, cyber security is an increasing concern. In the framework of our PEER initiative (which seeks to strengthen cross-sectoral cooperation between different sectoral authorities, across sectors, responsible for protecting consumer rights), CEER will bring together relevant experts for a workshop on cyber security to enhance our shared learning on trends and challenges.**

**3D Strategy: Digitalisation & Dynamic Regulation**

**Timing: Q2 2019 - Q2 2019**

**a) Please indicate if you consider this deliverable as "Very important", "Important" or "Not important".**

Very important ☐

Important ☐

Not important ☐

**C66. b) Do you think this work item contributes to the achievement of CEER's 3D strategy?**

**C67. c) Do you intent to actively participate in consultation, hearing, workshop, etc. if organised for this deliverable?**

Yes ☐

No ☐



**C68. d) Do you have any specific comment on this individual deliverable?**

**Thank you for submitting your response. We value your feedback.**