

Evaluation of Responses

Stakeholder comments on CEER Work Programme 2021

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Table of contents

EXECUTIVE SUMMARY	3
1. STAKEHOLDER FEEDBACK AND COMMENTS	4
1.1. General comments on the draft CEER 2021 WP	4
1.2. Comments on the work areas of the draft CEER 2021 WP	4
Customers and Retail Markets	4
Gas and electricity market developments.....	5
Distribution system operation	5
Cross-sectoral.....	5
1.3. Comments on individual deliverables	6
2. CONCLUSIONS.....	17
ANNEX 1 – ABOUT CEER.....	18
ANNEX 2 – LIST OF RESPONDENTS.....	19

EXECUTIVE SUMMARY

The Council of European Energy Regulators (CEER) appreciates and welcomes the comments and feedback received to the public consultation on its draft 2021 Work Programme (WP). A total of 15 respondents submitted their views. We received feedback on specific questions related to our priorities in 2021 (the draft Work Programme work areas) as well as on individual work items. Overall, although there were detailed differences of views, respondents expressed strong support for our proposed draft 2021 Work Programme work items.

CEER has since reviewed its draft 2021 Work Programme to take into account suggestions made by stakeholders and has provided further clarification and detail on the planned work items. The final Work Programme also reflects recent developments in energy policy at European level, in particular in regard to the EU Green Deal and New Consumer Agenda proposals as well as regulators' further thinking on timely energy regulatory trends and issues. Furthermore, Covid-19 has promoted an unprecedented impact in the energy sector which required regulators' attention and demanded particular analysis.

As a result, regarding the 2021 Work Programme, 27 work items will be pursued by CEER, alongside a range of ongoing activities and carry-over items from 2020 Work Programme.

This evaluation of responses document accompanies the final CEER 2021 Work Programme and provides CEER's considered reaction to the comments submitted.

1. Stakeholder feedback and comments

The public consultation on the 2021 Work Programme was launched on 18 June 2020. Reactions were sought, via an online questionnaire, by 31 July 2020.

In total, 15 respondents provided their views on the draft CEER 2021 Work Programme. The comments were received from a variety of organisations (see Annex 2). CEER appreciates the involvement and input from respondents.

The present document summarises the views expressed by respondents and presents the conclusions CEER draws from them.

[CEER's final 2021 Work Programme is available on the CEER website](#)¹. In line with our current practice, opportunities for stakeholder involvement in our work ([public consultations](#), [workshops/webinars](#) and [events](#)) are available on [CEER's website](#) as well and are updated on a regular basis.

1.1. General comments on the draft CEER 2021 WP

In general, stakeholders expressed their full support to the priority areas expressed (Digitalisation in the consumer interest, Decarbonisation at least cost, Dynamic regulation: European solutions for adaptive regulation in a fast-changing world, Clean Energy Package (CEP) implementation and significant recurring work) for CEER's Work Programme in 2021.

Several stakeholders welcomed the importance of having the implementation of CEP included in CEER's priorities, considered it to be crucial to ensure a well-functioning and competitive electricity market. For the development of this implementation, the cooperation between ACER and CEER was deemed to be relevant.

Digitalisation was broadly supported and considered by some stakeholders as one of the key elements to enable the energy transition and as one of the axes of action for EU. One stakeholder asked CEER for the need to emphasise digitalisation and the role of DSOs and consumers in this respect.

A respondent suggested to add to the priority areas energy storage and the economic and legal effects for the European Energy Union. Another stakeholder suggested to include as a priority the need to complete the internal gas market, pointing to the lack of interconnection capacity and/or high transmission tariffs.

1.2. Comments on the work areas of the draft CEER 2021 WP

Customers and Retail Markets

Customers are presented by the stakeholders as one of the main drivers to accomplish the green transition. They are considered to be the key to provide flexibility to the electricity system and to choose among a wide range of sustainable energy offers and products.

¹ https://www.ceer.eu/eeer_publications/work_programmes

Therefore, it was recommended for CEER to develop a paper on how to regulate (digital) innovations in the energy sector. It is suggested that it could be a conceptual contribution with a long-term perspective, focusing on the different paces at which regulatory processes and technological change evolve, and the resulting new risks that may come to consumers.

Some stakeholders averred that CEER should make a reference to the Energy Taxation Directive, which is deemed to be crucial for consumers' empowerment, as it will directly impact the attractiveness for consumers of decarbonisation/electrification technologies. CEER is then encouraged to develop a regulatory perspective on this.

One stakeholder suggested that CEER develop an analysis of the provision and use of real-time certificates of origin ("green certificates") that can be used for consumer empowerment.

Gas and electricity market developments

In relation to gas sector work items, the attention given to the role of gases within the decarbonisation part of the 3D Strategy was very much welcomed. Moreover, it was considered by some stakeholders that digitalisation in the context of gas is a major challenge, but it is also seen as an enabler for the injection of renewable and decarbonised gases and for effective sector coupling.

One stakeholder invited CEER to develop a closer look at the regulation of digital platform services provided by market actors and how such platforms may support decarbonisation from a sector coupling perspective, including both the electricity and gas sectors and also taking into account the risk of market distortion.

Distribution system operation

On distribution system operation, it was suggested that CEER could develop additional work related to distribution system operators (DSOs) as with the appropriate legislative and regulatory signal, they can contribute to decarbonisation. Moreover, CEER was invited to consider the role of the EU DSO Entity for the network development.

Several stakeholders mentioned the need to further prioritise work on cybersecurity and data access.

Cross-sectoral

The cross-sectoral area was considered by the majority of the stakeholders as a necessary focus to deliver CEER's strategy and to commit to the European Commission's (EC's) targets. CEER is asked to have a holistic approach promoting the right balance between sectors. One respondent suggested that the consideration of opportunities for convergence and innovative approaches should be built on CEER's past Future Role of Gas (FROG) work that focused on infrastructure system interests and considerations.

Two stakeholders referred to the sandbox solutions as possible vehicles to test and validate/discard regulatory changes that may facilitate innovation in the energy sector. Three stakeholders highlighted the importance of the group that will reflect on the lessons learned about the Covid-19 pandemic, as the analysis of its consequences is still ongoing, and further reflections are very much welcomed.

1.3. Comments on individual deliverables

The table below provides an overview of the comments received to the deliverables that were presented in the public consultation on the draft CEER 2021 Work Programme in June 2020. CEER's reaction and views to this input are included in the right-hand column of the table.

	Sector and title of deliverable	Specific comments	CEER views
	Customers and retail markets		
1	Self-Assessment Status Report 2019 for the Roadmap to 2025 Well-Functioning Retail Energy Markets	<ul style="list-style-type: none"> • 12 respondents provided responses to this work item. • There was general support to this item. • One respondent suggested that some indicators could assess customer satisfaction and protection in a more qualitative way. • Another respondent also suggested that NRAs should monitor the fulfilment of legal obligations that emerge with the CEP. • Finally, one stakeholder suggested that CEER focus more on wholesale markets and their degree of convergence. 	We will consider these observations whilst undertaking the work.
2	Advice on trustworthy information on green electricity contracts/the origin of electricity and consumer protection against misleading marketing	<ul style="list-style-type: none"> • 11 reactions were provided under this item. • One participant suggested the importance of ensuring GOs are properly used by the suppliers and that adequate information is given. • Another respondent suggested this is a great opportunity for CEER to contribute to the present debate on GOs and certificates for renewable and decarbonised gases, which are essential for consumer empowerment. 	<p>We will consider these observations whilst undertaking the work.</p> <p>CEER supports continuing efforts to ensure that information and advice provided to consumers is transparent as well as to enhance consumer protection against “greenwashing”.</p>

	Sector and title of deliverable	Specific comments	CEER views
	("greenwashing")		
3	Guidelines of Good Practice on future-proof comparison tools for the energy sector	<ul style="list-style-type: none"> • 11 respondents provided comments on this work item. • 4 stakeholders highlighted the relevance of comparison tools to properly handling the various options and services associated with supply, while also contributing to the well-functioning and competition of the internal market. 	<p>We will consider these observations whilst undertaking the work.</p> <p>CEER has supported high-quality and independent comparison tools for the electricity and gas sectors for some time and is pleased to see that there is an increasing interest in this work.</p>
4	Paper on digitalisation as a driver for better retail market functioning – key challenges and recommendations	<ul style="list-style-type: none"> • 13 reactions were provided under this item. • A respondent suggested this paper should also evaluate to what extent the market functioning and possible progress linked to digitalisation is "inclusive". • Another respondent suggested this could be an opportunity to provide meaningful insight into the state of play of the roll-out of smart meters in the EU. • There was a suggestion to consider addressing within this item the upcoming energy European data space topic. • One respondent suggested that the data collected by smart meters must be accompanied by digital platforms enabling the translation of energy data in a comprehensible way for consumers. 	<p>We will consider these observations whilst undertaking the work.</p>
5	ACER-CEER Market Monitoring Report	<ul style="list-style-type: none"> • 11 out of 15 provided input to this item. • One stakeholder suggested that the MMR should be improved by taking updated tariffs values at interconnection points and making an analysis of market integration between countries based on gas hub prices. 	<p>CEER appreciates and welcomes the valuable feedback and comments received. We will consider these observations whilst continuing to improve and refine</p>

	Sector and title of deliverable	Specific comments	CEER views
		<ul style="list-style-type: none"> Another stakeholder referred to the possibility of enhancing the report by including an analysis of new market developments related to CEER's 3D Strategy. 	our monitoring work to reflect market evolution, within the ambit of our regulatory responsibilities. We also note that robust and effective monitoring takes time to develop and requires widespread uptake of the issues to be monitored as well as development of suitable reliable indicators.
6	CEER Customer Conference	<ul style="list-style-type: none"> 12 respondents presented their views on this deliverable, which obtained major support from the respondents. 	Inputs and contributions to the annual Customer Conference are welcome. We will consider these observations whilst preparing the conference.
	Electricity		
7	2 nd Paper on unsupported RES	<ul style="list-style-type: none"> 11 respondents commented on this item. One respondent mentioned the importance of getting an overview of how RES installations are integrated into the electricity mix of the MS, what the current challenges might be, and provide insight in the competitiveness of RES with conventional sources after the support time has ended. Another stakeholder considered that this item should also take into account how this affects gas, as biogas and biomethane installations also receive support to inject into systems. It was suggested to consider all the indirect subsidies and not only the support scheme. A suggestion to include a reference to power purchase agreements was also provided. 	The purpose of this CEER paper is to provide an overview of how European countries are dealing with RES stations after the support time ended. The aim of this paper is not to analyse how RES is integrated in the electricity mix or analyse other measures for RES to be used, e.g. power purchase agreements. The introduction of renewables gasses will be checked, but likely the focus will remain on electricity – as was the

	Sector and title of deliverable	Specific comments	CEER views
		<ul style="list-style-type: none"> One respondent considered that this item should be integrated into the cross-sectoral area. 	case for the 1 st CEER Paper on Unsupported RES.
8	ACER-CEER contribution(s) on revision of the TEN-E Regulation	<ul style="list-style-type: none"> 11 respondents provided comments on this item, out of which 10 were interested in it. 4 respondents noted that TEN-E regulation should be adapted in order to be fit for the purpose of driving decarbonisation. This requires adequacy of the TEN-E guidelines and PCI lists in view of the CEP and the developments in the energy system. 2 respondents specifically focused on renewable/clean gases. One respondent would welcome an increasing oversight by ACER and CEER towards the TYNDP process to make sure that methodologies and scenarios are aligned with decarbonisation objectives 5 respondents highlighted that the TEN-E should reflect the importance of the role of DSO in the energy transition by considering small-scale projects, even without a formal cross-border aspect. 	<p>CEER welcomes the interest in this work item.</p> <p>CEER, jointly with ACER, already issued a position paper on the TEN-E revision, including on how to account for decarbonisation, for new gas infrastructures and for small scale projects and on how to strengthen the TYNDP governance.</p> <p>CEER will continue listening to all stakeholders, when forming further proposals for the updates of the TEN-E Regulation</p>
9	Sector coupling - integration across sectors	<ul style="list-style-type: none"> 12 respondents expressed their views on this item. 6 stakeholders highlighted the importance of ensuring a cross-sectoral approach to this item, considering not only gas and electricity but an integration of all the energy system. One respondent suggested that this approach could favour increased and improved coordination between ENTSO-E and ENTSG in the TYNDP, as well as increased cooperation with DSOs to adequately plan the system of the future. 	<p>This CEER activity aims to cover the wider context of sector coupling and will consider taking on board the suggestions to cover integration of the entire energy system and gas and electricity TSO and DSO cooperation. The exact output of this work item is to be determined at a later stage, i.e. following more information on the EU Strategy for Energy System Integration.</p>

	Sector and title of deliverable	Specific comments	CEER views
10	Paper on the integration of offshore/hybrid grids into the electricity market design	<ul style="list-style-type: none"> • 8 stakeholders provided their views on this item, the majority of which did not have very specific comments. • One respondent suggested that this work item should be tackled from the energy system integration point of view. • Another stakeholder mentioned that the approach to this paper should take into account the roles of national governments and NRAs when new offshore capacities are subject to call for bids or individual initiatives. 	The aim of this work item is to develop a more technical explanatory paper on how to integrate offshore grids in the electricity market. Where appropriate, CEER will take into consideration the comments on energy system integration.
	Gas		
11	Report on regulatory mechanisms to incentivise reductions in methane emissions in gas networks	<ul style="list-style-type: none"> • 11 stakeholders commented on this work item, the majority of which provided their express support for carrying it out. • One respondent mentioned the importance to be conscious of the fact that methane emissions do not only happen only on networks but on all the value of chain of gas. • Another respondent suggested that an assessment of the responsibilities of DSOs could be carried out to consider whether their activities should cover sustainability aspects related to reducing methane emissions. • It was suggested that the set of regulatory mechanisms should be clearly defined and should be subject to strict conditions. • One stakeholder mentioned it should be ensured that the regulatory mechanisms to incentivise reductions in methane emissions in gas networks cover costs efficiently incurred related to the improvement of the MRV (monitoring, reporting and verification) 	<p>CEER appreciates and welcomes the valuable feedback and comments received.</p> <p>CEER agrees on the importance to detect leaks along the entire value chain, considering not only the challenges of detecting them but also taking into account the fact that the value chain extends across borders and even beyond the EU.</p> <p>CEER also considers that TSOs, storage operators and LNG operators, as well as DSOs above a threshold, should be obliged to measure and report their emissions according to a standard methodology, with sufficient</p>

	Sector and title of deliverable	Specific comments	CEER views
			granularity to allow the identification of the highest emitters.
12	Paper on long-term storage	<ul style="list-style-type: none"> • 11 stakeholders provided comments on this work item. • One stakeholder mentioned that the main interest of power-to-gas lies in the management of long-term RES production surplus and that the surplus should remain limited by 2030/2035. • Another stakeholder averred that CEER's priority should be to secure constant electricity supply at all times and to ensure system stability. Therefore, access to all relevant markets must be possible without any technological restrictions. • One respondent mentioned that the gas infrastructure system allows for short, medium, and long-term (seasonal) storage, while batteries are only capable of providing energy storage in the short term. This large storage capacity provided by the gas system allows for the cost-efficient integration of variable renewable electricity sources (e.g. wind and solar). 	CEER welcomes the suggestions from the stakeholders and will consider them when undertaking the work.
13	Paper on regulatory innovations for smart sector integration	<ul style="list-style-type: none"> • 11 respondents expressed their views on this item. • The majority of the respondents expressed their support for the item. • One respondent referred to the need to ensure close cooperation between the gas and electricity sectors, namely by the cooperation between gas and electricity DSOs. Such cooperation could be achieved by the creation of an EU DSO body for gas, integrated into the EU DSO entity for electricity. • Another stakeholder mentioned the need for Europe to maintain its leadership and a market-based approach in the development of key emerging technologies coming from the energy system. • One respondent suggested this item should be developed in 	<p>CEER considers that to ensure the DSOs' views are part of EU deliberations when developing new measures, it would be useful to bring gas DSOs into a European DSO entity, with clearly defined tasks and objectives to support new technologies.</p> <p>CEER agrees with market-based approach where conditions allow it.</p> <p>CEER appreciates the suggestion</p>

	Sector and title of deliverable	Specific comments	CEER views
		coordination with work item 9 [on sector coupling].	to develop this item together with item 9. CEER will better specify the scope of both items in order to avoid any overlaps.
	Distribution systems		
14	Short paper on the market test on flexibility and storage	<ul style="list-style-type: none"> • 11 comments were provided on this item. • The majority of the respondents expressed their support of this item. • One respondent highlighted the importance that the procurement of these services should be market-based in order to reflect the availability and/or scarcity of flexibility in any given area of the local network, providing both price transparency and investment signals around grid reinforcement. • It was suggested that MS and NRAs should incentivise DSOs to improve efficiencies in the operation and development of the distribution system, reform the network to facilitate the growth of low carbon energy generation, and ensure accountability that investments deliver value for money. • It was also proposed that storage should include power-to-gas installations and demand side management allowed by hybrid heating appliances. 	This CEER short paper is aimed to provide guidance to DSOs on the market test for flexibility and storage, as a requirement in case DSOs want to own storage following Article 32(1) of the Electricity Directive. CEER will take into account the suggestions, where possible.
15	Short paper on distribution network planning	<ul style="list-style-type: none"> • 12 comments commented on this item, 5 of which expressed their explicit support for the development of this item. • One respondent asked for an analysis of the decarbonisation costs for DSOs and noted that only a few NRAs request that the data to be published 	CEER reconsidered the description text to avoid any misunderstandings. The suggested inclusion of TSO-DSO cooperation will be taken into account. Where

	Sector and title of deliverable	Specific comments	CEER views
		<ul style="list-style-type: none"> • Two stakeholders noted this paper should also take the perspective of vertical planning with TSOs and that cooperation between TSOs and DSOs should also be considered. • One respondent believes the text of the deliverable should be careful to not to imply that DSOs do not optimise the network investments. • A suggestion for the paper to take a look at how to integrate distribution network planning and transmission network planning at both national and European level was also provided. 	<p>possible and when data is available, CEER will consider including the suggestions on TSO-DSO cooperation and the DSO decarbonisation costs.</p> <p>This short paper will also take into account the discussions at the 23 October 2020 webinar on distribution network development plans.</p>
16	Paper on tariffs for sharing for energy communities	<ul style="list-style-type: none"> • 12 respondents provided their views on this proposed item. • One respondent suggested this paper should include a preparatory assessment of what similar measures could mean in the gas sector. • Another stakeholder suggested ensuring consistency with the good practices paper drafted by ACER. • One respondent reinforced the importance of assessing the distributional impacts of supportive measures and ensuring transparency on the network costs. 	<p>After further internal discussion, it was decided not to go for a formal paper on tariffs for sharing for energy communities in 2021. That being said, CEER still regards the topic as relevant and important and will continue to work on it, for instance also with other stakeholders, e.g. ACER and the BRIDGE Horizon2020 project.</p>
17	Report on Quality Regulation	<ul style="list-style-type: none"> • 9 respondents provided comments on this proposed item. • One respondent suggested looking at the sub-national regulatory regimes. • Another stakeholder suggested that this report should also provide 	<p>While the methodology and formulas will be available in the 7th Benchmarking Report on the Quality of Electricity and Gas Supply, the Report on Quality</p>

	Sector and title of deliverable	Specific comments	CEER views
		<p>more details about the methodology and formulas for rewards/penalties mechanisms adopted by each Member.</p> <ul style="list-style-type: none"> • One respondent also suggested that this report analyse the quality regulation regimes that have been used for integrated distributed generation. 	<p>Regulation will attempt to look into them in more detail. If the responding countries provide sufficient data, regulatory regimes used for distributed generation and regulatory regimes at the sub-national level will be analysed too.</p>
18	3 rd CEER Report on Power Losses	<ul style="list-style-type: none"> • 9 respondents expressed their views on the suggested item. However, the majority did not have any specific comment on this particular item. • One respondent suggested that the drafters of this report consider their approach in light of alternative solutions to reduce power losses. • Another respondent referred to the importance of this report, having an evolutionary perspective. 	<p>This paper is meant to continue the analysis of power losses in Europe and hopefully expand the number of participants (in addition to CEER and ECRB, MEDREG countries will be considered).</p>
	Cross-sectorial		
19	Regulatory Frameworks Report 2021	<ul style="list-style-type: none"> • 10 respondents commented on this work item. The majority of them expressed their support to the development of this item. • One respondent suggested that the report should also provide a transversal comparison of practices, summarising in one table the practice for each of the relevant parameters. 	<p>CEER notes that it is one of the most downloaded reports from the CEER website. CEER welcomes the support for the Regulatory Framework Report and will continue with this annual report. The suggestion to include an additional table will be reviewed.</p>
20	TSO Cost	<ul style="list-style-type: none"> • 8 respondents reacted to this item, the majority of which did not 	<p>CEER welcomes the support for</p>

	Sector and title of deliverable	Specific comments	CEER views
	Efficiency Benchmark (TCB21)	<p>have any particular comment to it.</p> <ul style="list-style-type: none"> • One stakeholder mentioned the importance of such a benchmark as a useful component for evaluating the infrastructure operators in the EU. 	this benchmarking exercise. CEER intends to set up a new round of benchmarking in 2021.
21	Advice on financial regulation and the links to REMIT	<ul style="list-style-type: none"> • 9 views were expressed on this item. • One respondent suggested that further to REMIT, other regulation topics, such as EMIR and MiFID II should also be analysed due to their impact on energy trading. • Another respondent highlighted its support for the ACER initiative to create a REMIT monitoring platform. 	CEER will consider these points in undertaking its work on this topic.
22	The COVID-19 pandemic: lessons learned about crisis preparedness and management in the energy sector and approaches to protecting energy consumers	<ul style="list-style-type: none"> • 11 stakeholders commented on this item, the majority of which expressed their interest and support for this initiative. • 3 respondents referred to the importance of focusing on the lessons learned, from technical to market issues. One of them emphasised the need to assess the crisis from a customer perspective. 	<p>CEER welcomes the positive feedback on this work item and takes good note on the suggestions to consider the lessons learned from technical to market issues.</p> <p>As customers represent one of the key priorities to the regulators, CEER will take into consideration their perspective in the development of this work.</p>
23	Report on Dynamic regulation from NRAs' perspective (tools and processes)	<ul style="list-style-type: none"> • 10 respondents reacted to this item. • One stakeholder suggested that this report should also ensure focus on preparing the regulatory framework for a competitive decarbonised gas market as outlined in the EC's hydrogen strategy. • Another respondent mentioned that regulation must become agile, 	CEER takes good note of the proposed suggestions in both comments, which coincide with the dynamic regulatory approach envisaged in CEER's 2019 "The Bridge Beyond 2025" Conclusions

	Sector and title of deliverable	Specific comments	CEER views
		creating an environment where innovation may flourish.	Paper.
24	Status Report on unbundling 2021	<ul style="list-style-type: none"> • 9 respondents expressed their views on this item. • One respondent mentioned that findings should not preclude future hydrogen regulation and that TSOs can play a positive, cost-effective, and essential role kick-starting the necessary developments. • Another respondent mentioned it would be interested in limiting the issuing of this report to an interval of every 2-3 years. 	CEER takes good note on the comments received and will take both suggestions into consideration in future work.

2. Conclusions

CEER appreciates the valuable suggestions and comments received and thanks the 15 respondents for participating in the consultation. Given the reactions, we consider that our effort to set up a meaningful work plan for 2021 is generally endorsed by respondents.

Stakeholders strongly supported the main proposed areas of principal relevance for CEER's Work Programme in 2021.

CEER views on the specific comments received on the CEER draft 2021 Work Programme are reflected in the table above, but overall, stakeholders found that the work items we have proposed appropriately address CEER's key priority areas. In many areas, whilst supporting the proposals overall, some respondents have taken the opportunity to contribute views on specifics of the substance of the proposed work items.

CEER's focus on consumer and retail markets is broadly supported. In general, stakeholders consider consumers to be one of the main drivers to achieve the green transition and considered that the deliverables proposed address consumer issues and will contribute to stronger consumer participation in the energy market.

Respondents expressed their support for CEER's work on gas and electricity. Moreover, great emphasis is given to the development of the work in relation to the digitalisation under the 3D strategy.

Regarding CEER's work on the distribution network, stakeholders broadly provided their support to the proposed items, some of which will help with CEP implementation.

On CEER's cross-sectoral work, stakeholders particularly welcomed the work on the Covid-19 and stressed the need to have a holistic and integrated approach in the development of future work. Moreover, they have also emphasised the importance to develop further work on cybersecurity.

The comments received in response to this consultation will be reflected in the development of CEER's 2021 work programme and, where appropriate, in later Work Programmes.

In the event of unpredictable developments, CEER may make any necessary changes to the proposed 3D Strategy and Work Programme 2021.

Annex 1 – 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 39 European countries) are the statutory bodies responsible for energy regulation at national level.

One of CEER's key objectives is to facilitate the creation of a single, competitive, efficient and sustainable EU internal energy market that works in the public 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 EU single energy market is not a goal in itself but 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 consumers and businesses.

The work of CEER is structured with a number of working groups and work streams, composed of staff members of the national energy regulatory authorities, and supported by the CEER Secretariat. This report was prepared by the CEER Work Programme Drafting Committee.

More information at www.ceer.eu.

Annex 2 – List of Respondents

Organisation
BEUC, The European Consumer Organisation
CEDEC
EDF
ENAGAS
ENEDIS
ESMIG, The European Smart Energy Solution Providers
EURELECTRIC
EUROGAS
GD4S
GEODE
Institute for European Economic Law, University of Cologne
NODES
Nvalue AG
Swiss Federal Office of Energy SFOE (Digital Innovation Office)
UPRIGAZ