



Fostering energy markets, empowering **consumers**.

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## **Evaluation of Responses**

# **Stakeholder comments on CEER Work Programme 2018**

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## **EXECUTIVE SUMMARY**

The Council of European Energy Regulators (CEER) appreciates and welcomes the comments and feedback received to the public consultation on its 2018 draft Work Programme (WP). A total of 13 respondents submitted their views. We received feedback on the priority areas as well as individual deliverables. Overall, although there were detailed differences of view, respondents expressed strong support for our proposed 2018 deliverables. There was also a broad consensus on the importance of the priority areas identified.

CEER has reviewed its draft 2018 Work Programme to take into account suggestions made by stakeholders and has provided further clarification and detail on the planned deliverables. The final Work Programme also reflects recent developments in energy policy at European level, in particular as regards Energy Union proposals as well as regulators' further thinking on timely energy regulatory trends and issues. As a result, 19 deliverables will be pursued by CEER during 2018, alongside a range of ongoing activities.

This evaluation of responses document accompanies the final CEER 2018 Work Programme and provides CEER's considered reaction to the comments submitted.



## **1. Stakeholder feedback and comments**

The public consultation on the CEER draft proposals of its 2018 Work Programme was launched on 7 June 2017. Reactions were sought via an online questionnaire by 31 July 2017.

In total, 13 respondents (1 out of them was confidential) provided their views to the draft CEER 2018 Work Programme. The comments were received from a variety of organisations (Annex 2). CEER appreciates the involvement and input from stakeholders.

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

CEER's final 2018 Work Programme, as well as the non-confidential responses to our online consultation are available on the CEER website. In line with our current practice, CEER will continue to provide opportunities for stakeholder's contribution to our work via public consultations, workshops and public hearings. All information is available online and is updated on a rolling basis.

### **1.1. General comments on the draft CEER 2018 WP**

In general, stakeholders expressed their strong support of the four proposed areas for CEER Work Programme in 2018. The priority area on International work beyond the EU borders was however considered to be a low priority by 2 of the respondents. The work of CEER should remain flexible and responsive in order to follow major legislative initiatives, which will emerge in 2018 and should complement the work of ACER.

Some stakeholders also underlined the predominance of the Clean Energy Package in CEER's thinking, which raised concerns on the CEER 2018 Work Programme being heavily electricity oriented. Some respondents reminded CEER that policy measures should increasingly think in holistic terms in order to achieve an efficient energy market for consumers, and the regulatory framework should keep in step.

Stakeholders also suggested adding a fifth area to the CEER 2018 Work Programme on the wholesale market. However, this topic is predominantly an ACER area of responsibility.

Even if not stated in the draft WP 2018, some stakeholders also welcomed CEER's White Papers and the PEER initiative.

### **1.2. Comments on the priority areas of the draft CEER 2018 WP**

The majority of respondents expressed their strong support of priority 1 on consumer issues. On new legislative/policy developments, stakeholders expressed their support for CEER's involvement in



discussions, exchanges and interactions with the European institutions. 12 out of a total of 13 respondents support CEER's priority regarding the role of Distribution System Operators.

On the other hand, 8 respondents considered priority 4 on CEER's involvement in work beyond the EU borders as less relevant for the moment.

Stakeholders proposed few other areas that could be included in the CEER Work Programme:

- Wholesale Market as a fifth priority;
- Intensify CEER's activity in pending gas market studies carried out by the Commission;
- Development of key indicators for DSO in their relationship and interactions with consumers could help to improve the functioning of the market in essential areas for consumers;
- Conduct studies on the regulatory frameworks for DSOs as regards to the development of new services. These studies should take into account a potential role for DSOs within the RES revolution;
- CEER should boost cooperation with regulators from the Energy Community Contracting Parties to create a platform of effective cooperation.

### **1.2.1 Consumers and retail markets**

12 respondents out of 13 provided comments on this priority area. All of them supported the focus on consumer and retail markets issues and generally welcomed the proposed deliverables.

However, several other areas of work for CEER were proposed by respondents for this priority area:

- Behavioural aspects leading to a more positive consumer experience in energy markets (such as on switching, demand response, self-generation and more generally, consumer participation in the energy market);
- Local energy Communities;
- Benchmarking of different practices and national regulatory frameworks on billing, highlighting some best practices;
- CEER to consider a new work-stream related to the analysis of the capability of current regulatory frameworks to cope with the issues of bad payers and thefts from the grid. Putting in place fair rules to contrast these problems is key to guarantee a proper functioning of the retail markets, increasing also a responsible consumers' engagement.
- Guidelines on billing, retail prices, credit risks;
- CEER should make sure that regulations for the electricity sector will not be simply mirrored to the gas sector. Therefore, CEER as the organization of the national regulatory authorities



should advise the Commission regarding the decision on the provisions to be mirrored to the gas sector.

Two respondents strongly supported the Market Monitoring Report and asked for its continuation. One stakeholder mentioned that the NRAs need to adapt their monitoring, which should include different aspects such as; distribution of suppliers' margins across different consumer groups; consumers' exercise of rights; materialization of benefits promised to consumers from the smart meters roll out; more details on prosumers; better explanation of dynamic tariffs to consumers and a strengthened focus on the energy poor and on vulnerable consumers.

Three respondents highlighted the importance of the PEER initiative.

One respondent reflected that consumers' engagement should be considered in the light of the costs - compared to potential gains that it could create. This point of view should be taken into consideration also when considering local energy communities (LECs). And while selecting case studies on the development of renewable energy communities, CEER should give particular attention to the assurance of security of supply for the whole energy system as well as to solidarity between all energy consumers.

One respondent added that CEER guidelines would be appreciated on the issues of billing, retail prices and credit risk.

### ***1.2.2 New legislative/policy developments***

11 of 13 respondents provided comments on this priority area. There was an overall support for CEER addressing this priority in the light of forthcoming new legislation within the framework of the Clean Energy Package (CEP). CEER is seen as well placed to take a proactive role in advising the European Commission on various regulatory aspects.

One stakeholder suggested that CEER develops a methodology to compare dynamic price contracts and bundled offers in an objective and easily understandable way for consumers, adding that, with regard to PCTs in general, CEER should coordinate an advice on accreditation schemes for comparison websites.

Two respondents considered that the implementation of the Security of Gas Supply Regulation should be worked on by CEER, keeping in mind continuing issues on LNG and storage. The respondent supports the planned CEER study on LNG barriers.

Two stakeholders supported the White Papers initiative as being an example of active involvement



of CEER in interacting with the Commission.

One respondent suggested taking into account the improvement of customer protection within the CEP using any kind of consumer dispute resolution system for the energy market. CEER should in its Work Programme, acknowledge that consumer protection and consumer dispute resolution are key issues that should be taken into consideration.

One stakeholder also suggested that CEER also contributes to the Commission with its experience of the Wholesale Market.

### ***1.2.3 The role of Distribution System Operators***

12 of the 13 respondents provided comments on this issue. The majority of stakeholders welcome CEER's focus on the role of Distribution System Operators (DSOs) and agree on their role as the "network optimizers and neutral market facilitators". Some stakeholders find that DSOs are positioned not only to help in better market functioning but also with regard to evolving retail markets and provision of new services. A distinction between gas and electricity concerns should be made in number of respects.

One respondent supported that CEER focuses on the analysis of the impact of new entities and their corresponding activities that impacts the DSOs' role.

Two stakeholders recognised that monitoring cyber security developments was important at this point.

One stakeholder underlined that NRAs should recognize the broadening role of DSOs as neutral market facilitators and set out the most appropriate regulatory frameworks to encourage efficient technological innovation. They should implement mechanisms which create incremental incentives for innovative grid projects, since new elements connected to the distribution grid will require more active grid management, for example, distributed generation, storage facilities, demand-side response, smart charging and ICT solutions and security.

One respondent mentioned that it is essential to extend the monitoring of quality of supply to other areas such as new connections, to meter readings and to complaints.

One stakeholder suggested that CEER evaluates the existing regulatory framework of DSOs as well as their potential improvement to support the development of DSOs' non-distribution activity and proposes that CEER conducts studies on this subject as regards the development of new services.



The study should take into account the potential role of the DSOs in the RES revolution.

#### ***1.2.4 International work beyond the borders of the EU***

7 of 13 respondents gave comments on this issue. Several respondents supported CEER's international efforts mainly in the form of the exchange of the regulatory expertise and experience.

One respondent mentioned it supports the current analysis relating to the future development of the European market for natural gas.

One stakeholder recommended that CEER boosts its cooperation with regulators from the Energy Community Contracting Parties in order to create a platform of effective cooperation.

Some respondents, however, considered international work as being a low priority or not relevant at all for CEER.





### 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 2018 Work Programme in July 2017. CEER’s reaction and views on this input is included in the right hand column of the table.

	Sector and title of deliverable	Not important	Important	Very important	Further comments	CEER views
	Consumer and retail markets					
1	Consumers and retail markets: Follow up of the Clean Energy Package (regarding retail markets and consumer empowerment)	0	0	13	<p>It is important that CEER gives its opinions and recommendations on customers’ empowerment and retail markets. DSOs are deeply affected and involved in the redesign of electricity markets and consumer engagement. One stakeholder expects that CEER will closely involve DSOs when designing regulation in view of implementing the Clean Energy Package legislative proposals.</p> <p>One respondent believes that getting the regulatory framework right, for local energy communities, energy consumers, prosumers etc., is important for the orderly functioning of Europe’s energy system. With the Commission’s intention to foster the concept all across Europe it is important to provide regulatory certainty for existing electricity system stakeholders and users. There are questions to address which impact on the financing conditions for the electricity system.</p>	CEER agrees that this is an important area of focus
2	Consumers and retail markets: ACER/CEER	0	2	11	Well-functioning retail markets are key to enabling customers to make more informed choices about their electricity consumption. Being responsible for delivering safe and	Agree



	Sector and title of deliverable	Not important	Important	Very important	Further comments	CEER views
	Market Monitoring Report on Consumer Empowerment and Protection Chapter				<p>secure electricity directly to Europe’s homes and households, DSOs represent a central link for customers and municipalities.</p> <p>DSOs already today act as neutral market enablers, facilitating the switching process between suppliers, connecting users for access to the grid, providing data from smart meters and even acting as data hub operators. Moreover, DSOs are increasingly becoming active system managers and flexibility enablers.</p> <p>ACER/CEER’s monitoring report should also include best practices and examples on DSOs’ customer engagement and market facilitation activities.</p> <p>One stakeholder considers that the ACER/CEER monitoring report should also include best practices and examples on DSOs’ customer engagement and market facilitation activities.</p> <p>One respondent underlines that the annual reports on Retail Markets and on Consumer Empowerment and Protection are an important tool to analyse and monitor the market functioning and trends at EU level, contributing to the identification of distortions and barriers to be removed and giving to institutions and stakeholders comparison figures.</p>	<p>CEER considers that it is essential that the regulatory framework for DSOs facilitates their growing role as independent market facilitators</p> <p>We will consider this in undertaking our work</p> <p>We will consider this in undertaking our work</p> <p>Agree</p>
3	Consumers and retail markets: Report on Retail Market Monitoring	1	2	10	<p>One respondent underlines that the annual reports on Retail Markets and on Consumer Empowerment and Protection are an important tool to analyse and monitor the market functioning and trends at EU level, contributing to the identification of distortions and barriers to be removed and giving to institutions and stakeholders comparison figures.</p>	Agree



	Sector and title of deliverable	Not important	Important	Very important	Further comments	CEER views
	Gas					
4	Gas: Follow up of recommendations emerging from CEER Study on Future Role of Gas (FROG)	4	3	6	<p>One respondent underlines that CEER's work as a follow up to the 2017 FROG Study on the future role of gas (which ENA is currently participating as GEODE's representative) is extremely important; looking at the role gas can play in delivering a lower carbon energy system at affordable cost to consumers.</p> <p>Following one stakeholder CEER has the responsibility of ensuring that gas is not overlooked, and that the studies and recommendations on regulatory approaches respect specific sectoral considerations as appropriate.</p> <p>CEER's work as a follow up to the 2017 FROG Study on the future role of gas (which ENA is currently participating as GEODE's representative) is extremely important, looking at the role gas can play in delivering a lower carbon energy system at affordable cost to consumers. Particularly important to include consideration of Biogas, Synthetic Natural Gas, Hydrogen, LNG and CNG etc. and the implications for the existing gas networks infrastructure and any possibility of stranded assets.</p>	<p>Agree</p> <p>Agree</p> <p>CEER agrees that the future role of gas should be considered in a broad context</p>
5	Gas: Follow up of any recommendations and findings from the 'Removing LNG Barriers on Gas Markets' study	3	5	5		



	Sector and title of deliverable	Not important	Important	Very important	Further comments	CEER views
	Cross-sectoral					
6	Regulatory aspects of new practices such as self-consumption and Local Energy Communities	0	2	11	<p>1) The 'renewable' and 'local energy communities' introduced by the Clean Energy Package will probably be clarified and more precisely defined in the final legislative texts.</p> <p>The stakeholder promotes the active participation of customers and their engagement in energy communities. DSOs are willing to support their development by offering the most adequate grid infrastructure solution and other services (grid balancing, information on energy consumption and others). DSOs are ready to experiment different solutions and innovative partnerships, in order to respond to growing societal needs while maintaining current DSOs' roles, and minimizing distribution costs for society.</p> <p>All players, including new market entities and local energy communities must be fully integrated in the electricity market and comply with regulation according to the activities they are carrying out. An important aspect to be considered is to defend the rights of the existing customers, by making sure that those consumers who choose not to take part in a local energy community are not disadvantaged.</p> <p>In this regard, CEER should address the question of socialization of network costs in its upcoming report, which is the underlying principle in the current design of electricity grids. In addition, the stakeholder recommends that national regulatory authorities play a key role in the monitoring and the supervision of local energy communities in a way that safeguards the public interest in a non-discriminatory way, an element, which we believe should be strengthened, when</p>	CEER will consider these points in undertaking its work on this topic



	Sector and title of deliverable	Not important	Important	Very important	Further comments	CEER views
					<p>working out best regulatory practices.</p> <p>2) The Clean Energy Package proposals for self-consumption and Local Energy Communities (LECs) have the potential to accelerate active consumers to become self-sufficient in their electricity use, but also raises questions concerning the financing of the electricity grid, and also, possibly, of the gas grid – either through potential for local (especially renewable) grids or through competition between gas and local electricity suppliers.</p> <p>As the industry considers more LEC proposals it will be important to ensure the economic and social interests of all customers are taken into account in the assessment process.</p> <p>As a point of principle, any independent local networks initiative should be deemed as a regulated activity and therefore be subject to the same requirements applicable to the DSOs. Consideration must be given to how network costs will be accounted for by all parties, including those who leave the LEC.</p> <p>Member States should be allowed to decide whether to introduce a legal framework for local energy communities. In some Member States, there is no need to introduce new legislation in this respect as LECs e.g. IDNOs and IGDNs in the UK are already well established. In which case the subsidiarity principle should be respected.</p> <p>3) One stakeholder promotes the active participation of customers and their engagement in energy communities. CEER should address the question of socialization of network costs in its upcoming report, which is the underlying principle</p>	<p>CEER will consider these points in undertaking its work on this topic</p> <p>CEER will consider these points in undertaking its work on this topic</p>



	Sector and title of deliverable	Not important	Important	Very important	Further comments	CEER views
					<p>in the current design of electricity grids. In addition, the respondent recommends that national regulatory authorities play a key role in the monitoring and the supervision of local energy communities in a way that safeguards the public interest in a non-discriminatory way, an element, which should be strengthened when working out best regulatory practices.</p> <p>4) One respondent strongly supports the collecting and comparing of information on the different regulatory approaches as to create some EU benchmarking on such a complex and increasingly important issue.</p> <p>5) One stakeholder underlines that the Clean Energy Package proposals for self-consumption and Local Energy Communities (LECs) have the potential to accelerate active consumers to become self-sufficient in their electricity use, but also raises questions concerning the financing of the electricity grid, and also, possibly, of the gas grid – either through potential for local (especially renewable) grids or through competition between gas and local electricity suppliers.</p> <p>It will be important to ensure the economic and social interests of all customers taken into account in the assessment process.</p> <p>As a point of principle, any independent local networks initiative should be deemed as a regulated activity and therefore be subject to the same requirements applicable to the DSOs. Consideration must be given to how network costs will be accounted for by all parties, including those who leave the LEC.</p>	<p>Agree</p> <p>CEER will consider these points in undertaking its work on this topic</p> <p>Agree</p> <p>CEER will consider these points in undertaking its work on this topic</p>



	Sector and title of deliverable	Not important	Important	Very important	Further comments	CEER views
					Member States should be allowed to decide whether to introduce a legal framework for local energy communities. In some Member States, there is no need to introduce new legislation in this respect as LECs e.g. IDNOs and IGDNs in the UK are already well established. In which case the subsidiarity principle should be respected.	CEER will consider these points in undertaking its work on this topic
7	Report on Investment conditions 2018	0	10	3		
8	Report on the unbundling and certification of TSO's - where are we now and what's new in the Clean Energy for All Europeans?	4	4	5	This is very important. There is a need to consider the CEP proposals on ITO unbundling and ensure there are no unintended consequences for other regulatory arrangements which are working well e.g. in Scotland.	CEER agrees that this work is important
9	Guidelines of	0	5	8	1) In a joint response of the four DSO associations to CEER's	CEER will consider these points in







	Sector and title of deliverable	Not important	Important	Very important	Further comments	CEER views
					<p>they will need priority access to those services at times of grid constraints to handle congestion, to maintain grid stability and secure grid operations. As many of the flexibility resources are replacing that which was historically on the transmission system a 'whole system' approach has to be adopted to avoid creating unintended consequences elsewhere. ENA's DSO members, both gas and electricity, have considerable experience of working under the UK's RIIO regulatory framework with a range of successful flexibility and innovation projects, experience which now underpins the new Open Network Project (link in C15). As energy systems become more integrated, a whole systems approach which takes into account the interactions between gas and electricity networks is needed.</p> <p>Careful consideration needs to be given when designing future regulatory frameworks if they are not to become a barrier to the take up of these new technologies, including the scope of their application. In this respect, and particularly in the case of electricity battery storage, we believe there should be greater focus on how the technology is used (ie its function within the system and market) rather than the technology itself. It should be recognised that there are circumstances where electricity network utilisation and the ownership of storage assets is entirely consistent with wider electricity market arrangements. It is also important that regulation takes account of the normal management of the gas network, for example the use of 'line pack' storage within gas pipelines.</p> <p>3) On DSOs' deliverables, welcomes the CEER planning, in particular the drafting of Guidelines of Good Practice on Flexibility Use at Distribution Level and the Report on New</p>	<p>undertaking its work on this topic</p> <p>CEER agrees that these are important issues</p>



	Sector and title of deliverable	Not important	Important	Very important	Further comments	CEER views
					<p>services and associated activities for DSOs (deliverable n. 9 and 10)</p> <p>4) At the time of responding to this consultation, it looks as if the mooted “mirroring” exercise will not go ahead under this Commission and aspects of electricity and gas retail market provisions risk to move out of step. Potentially, depending on the final CEP provisions, this raises issues for suppliers of electricity and gas, and DSOs. Therefore, over a range of work items, CEER has the responsibility of ensuring that gas is not overlooked, and that the studies and recommendations on regulatory approaches respect specific sectoral considerations as appropriate. At the same time, regulators should have a sound understanding of the interactions between gas and electricity sectors with regard for example to issues raised by C9, the consideration of which should take into account normal operation of gas networks (e.g. linepack).</p>	CEER agrees that the interactions between gas and electricity should not be overlooked
	Cross - sectoral					
10	Report on New Services and Associated Activities for DSOs	1	2	10	<p>1) Member states’ regulatory systems already provide a sufficient framework with relevant guidance on how new services and associated activities for DSOs should be evaluated. This guarantees that if the DSOs are providing new services, they will be in compliance with the regulatory rules in place, and therefore will not cause market distortions. The efficiency of member states’ regulatory frameworks was proven in the past as it had provided necessary answers on how to deal with DSOs’ evolving roles.</p> <p>2) A regulatory framework aimed at setting conditions under which DSOs could use flexibility is of the utmost importance,</p>	<p>CEER will consider these points in undertaking its work on this topic</p> <p>CEER will consider these points in</p>



	Sector and title of deliverable	Not important	Important	Very important	Further comments	CEER views
					<p>so that having an EU benchmarking and information on the different regulatory approaches is key to assess the pros and cons of each solution. The main drivers for the use of flexibility on distribution networks are related to the need of increase efficiencies in the planning, operation and development of the distribution system, especially when related to managing grid constraints, taking into account the development of distributed resources, the empowerment of consumers thanks to smart meters, demand response and the electrification of final consumption. The entry of new actors such as aggregators and Local Energy Communities could create increasing pressure on the planning and operation of distribution networks: the regulatory should be adapted carefully to new challenges and duly take into consideration the need to ensure efficient and secure distribution grid management.</p> <p>3) This is extremely important work, looking at the regulation of emerging services and associated activities that may impact the role of DSOs.</p> <p>ENA's Open Networks Project is bringing together the leading minds in the UK energy industry to lay the foundations for a smart energy grid in the UK. The project will enable the UK electricity DSOs to move from their traditional role of delivering electricity in one direction from centralised power plants to homes and businesses to one where they act as a smart platform that enables a whole range of new energy technologies that generate, consume and manage electricity. Careful consideration needs to be given to when designing future regulatory frameworks if they are not to become a barrier to the take up of these new technologies, including the</p>	<p>undertaking its work on this topic</p> <p>CEER agrees that this is an important issue</p>



	Sector and title of deliverable	Not important	Important	Very important	Further comments	CEER views
					<p>scope of their application. CEER should avoid a rigid framework for emerging DSO services and associated activities, since we don't know exactly what services DSOs will be asked to deliver in future. The market is changing very quickly, so the role of the DSO must be allowed to evolve.</p> <p>Rather than analyse separate services, it would be better to develop a set of agreed high level principles that can be applied to any new service as they develop – this will provide more certainty on what should be within or out with the scope of DSOs.</p>	
11	Distribution tariffs	2	4	7	<p>1) CEER provided guidelines on distribution network tariffs in January 2017, working again on this topic will not bring more benefits.</p> <p>2) It is useful to look at DSO tariffs, but analysing the benefits of different approaches must also consider the approach taken to connection costs and the connection charging policy. The split between these costs differs between Member States and it would not be meaningful to look at just tariffs in isolation.</p> <p>The objective of DSO tariff development should be to establish a pricing scheme for DSOs that encourages end users to behave so that the overall efficiency of the energy system is maximised and tariffs, are duly recovered in line with the principles of costs reflectivity and fairness. As part of this, it should recognise the whole system impact of changing incentives, including how DSO tariffs impact Transmission and customers.</p> <p>We support the concept of a good practice guide but think</p>	<p>CEER considers that this continues to be an important issue</p> <p>CEER will consider these points in undertaking its work on this topic</p>



	Sector and title of deliverable	Not important	Important	Very important	Further comments	CEER views
					that anything more detailed will be difficult and time consuming to produce.	
12	DSO Benchmarking Report	0	4	9		



## 2. Conclusions

### 2.1. CEER evaluation of stakeholder comments

CEER appreciates and welcomes the valuable feedback and comments received.

Our views to the specific comments received, are reflected in the table above, but overall, stakeholders strongly supported that the deliverables we have proposed appropriately address CEER's key priority areas.

CEER's focus on the consumer and retail markets, is broadly supported. Generally, stakeholders considered that the deliverables proposed correctly addresses consumer issues and will contribute to stronger consumer participation in the energy market.

Respondents expressed their strong support of CEER's work on the role of Distribution System Operators (DSOs) and examining their changing role in the energy market. The regulatory framework is the important enabler for DSOs to be independent market facilitators and allows necessary efficient investments in the network.

Widely supported was also the third priority area on new legislative/policy developments. CEER will and undertake an active role in light of the upcoming European legislation and will advise the European Commission on regulatory aspects in a range of areas.

CEER's international work beyond the EU borders evoked disagreement among stakeholders. On the one hand it is seen important for expertise and experience exchange but on the other hand some stakeholders do not see the mandate for regulators to engage in such work. CEER continues to find that international engagement provides useful information and contacts which supports CEER's wider work.

The comments received in response to this consultation will be reflected in the development of CEER's 2018 work programme and, where appropriate, in later Work Programmes from 2019 and onwards.

In the event of unpredictable developments, CEER will make any necessary changes to the proposed Work Programme 2018.



## **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 36 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](http://www.ceer.eu).



## Annex 2 – List of Respondents

Organisation
BEUC, THE EUROPEAN CONSUMER ORGANISATION
CEDEC
EDSO
ENEDIS
ENEL
ENERGY NETWORKS ASSOCIATION (ENA)
EURELECTRIC
EUROGAS
EUROPEAN ENERGY MEDIATORS GROUP (EEMG)
FOGELBERG CONSULTING
NEON
POLSKIE GÓRNICtwo NAFTOWE I GAZOWNICTWO (PGNIG S.A.)
UPRIGAZ