



PUBLIC CONSULTATION DOCUMENT

CEER 2025 Work Programme

Work Programme Drafting Committee

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Information page

Abstract

CEER is looking for feedback on the proposed items of its 2025 Work Programme. The development of CEER's annual work programme is guided overall by the CEER “Empowering Consumers for the Energy Transition” Strategy for the period 2022-2025.

Target audience

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

How to respond to this consultation

Deadline: 12 August 2024

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

If you have any queries relating to this consultation paper or the online consultation, please contact:

CEER Secretariat

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All responses, except confidential material, will be published on the website www.ceer.eu

Treatment of confidential responses

In the interest of transparency, the Council of European Energy Regulators (CEER):

- i. will list the names of all respondents or, alternatively, publish the number (but not the names) of fully confidential responses received;
- ii. asks that any respondent requesting confidentiality submit confidential responses by marking them as "confidential" in the online questionnaire. CEER will publish all responses that are not marked confidential.

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1 Introduction

Each year, CEER prepares a work programme which seeks to meet the challenges posed by energy market developments. It is important that CEER identify topics which enhance regulation with the aim of improving the operation of energy markets to the benefit of consumers. Our 2025 Work Programme is shaped by the new CEER “Empowering Consumers for the Energy Transition” (Energy Transition) Strategy.

Based on the Energy Transition Strategy, CEER’s work programme for 2022-2025 will prioritise activities that contribute to implementing the six core areas derived from the strategic statement, as described below, and to achieving our strategic aims more broadly. In other words, CEER deliverables and activities should contribute, directly or indirectly, to outcomes that further these goals. The following chapters describe the elements of the new Strategy in more detail. The logic of the Strategy is illustrated in a two-part diagram found in the Strategy document. The complete strategy document can be found [here](#).

1.1 The six core areas of CEER’s Energy Transition Strategy

CEER has adopted a forward-looking consumer-centric “Empowering consumers for the energy transition” Strategy for the period running from 2022 to 2025. The six core areas of CEER’s Empowering Strategy are:

- Consumer-centric design;
- Sustainable and efficient infrastructure;
- Well-functioning markets;
- Energy system integration;
- Flexibility;
- Decentralised and local energy.

The six core areas constitute the main drivers of our proposed 2025 Work Programme work items and provide the rationale for most of our work until the end of 2025. This draft 2025 Work Programme clearly identifies the core areas to which each deliverable contributes (see the work items listed below). Many work items contribute to more than one core area.

Alongside CEER’s strategy driven work, a significant part of our annual activities are the monitoring and benchmarking efforts in collaboration with other partner organisations such as the EU Agency for the Cooperation of Energy Regulators (ACER) or the Energy Community Regulatory Board. CEER also engages in international work, as well as other events and initiatives. The recurring work for 2025 is explained in more detail under heading 2.7.

1.2 Public consultation and further process

Regulators, working through CEER, focus on a number of key areas which are important for advancing energy markets and improving their effective operation to the benefit of consumers.

CEER sees stakeholder consultation as important both in setting our priorities for the year ahead and for the subsequent development of our work in 2025. All interested parties are therefore invited to participate in this consultation and **submit comments by 12 August 2024**.

Stakeholders are invited to participate in the public consultation via a dedicated online questionnaire on the [public consultation page](#) of the CEER website. Please note that only answers submitted via the online questionnaire will be taken into consideration. No special registration or password is needed to access the online questionnaire.

2 CEER's priorities in 2025

Like other organisations, CEER must prioritise its work so that scarce resources can be used most effectively. CEER's Strategy provides the overall framework for our work from 2022-2025.

CEER's priorities in 2025 are:

- Consumer-centric design;
- Decentralised and local energy;
- Sustainable and efficient infrastructure;
- Energy system integration;
- Well-functioning markets;
- Flexibility;
- Significant recurring work.

2.1 Consumer-centric design

It is beneficial for the entire energy system when consumers have more information and knowledge. Therefore, CEER will cover critical topics for consumers, such as dynamic pricing contracts and energy sharing, as well as existing features like termination fees and bundled products. CEER plans to share expertise between NRAs on these topics and provide recommendations and/or guiding principles.

2.2 Decentralised and local energy

In order to be effective, the energy transition needs to include consumers in the process, recognising and respecting their needs and choices, guaranteeing their rights and supporting the most vulnerable. At the same time, it must provide consumers with the necessary tools and framework to participate in efforts to achieve a sustainable and carbon-neutral society.

CEER plans to update the paper on how renewable energy sources (RES) electricity is handled.

2.3 Sustainable and efficient infrastructure

As many Member States (MS) and their distribution system operators (DSOs) face challenges in connecting the ever-increasing RES production and demand, CEER plans to support national regulatory authorities (NRAs) to acquaint themselves with new and innovative ways and best practices (if any) to manage grid bottlenecks, e.g. allocating already existing capacity and other tools.

CEER will analyse the distribution network development plans framework to identify key recommendation in the area. CEER also plans to continue to provide a general overview of the regulatory systems for electricity and gas networks (transmission system operators (TSOs) and DSOs) in CEER member countries (MCs).

2.4 Energy system integration

An integrated energy system considers the adequacy of all available resources to ensure security of supply, regardless of the future energy mix, and manages supply and demand in the most cost-effective manner. The development of new technologies, such as renewable and low-carbon gases, drives the emergence of new market trends and solutions.

2.5 Well-functioning markets

Energy commodity prices have recently reached unprecedented high levels across Europe. Security of systems and supply as well as reliability remain key focus areas. Therefore, liquid natural gas (LNG) projects are slated for research in 2025, particularly regarding the new role of LNG terminals in the framework of decarbonisation.

In alignment with energy policy objectives, and as one of the pieces of the regulatory framework puzzle, CEER plans to explore Smart Grid Indicators. The aim is to build a comprehensive framework regarding performance evaluation indicators.

In order to support efficient and necessary regulatory decision-making for these dynamic times, CEER plans to develop guidance on Good Practices of Regulatory Impact Assessment. Additionally, we will keep track of the progress Member States are making toward well-functioning retail electricity and gas markets by 2025. CEER monitors and reports on NRAs' self-assessment of national retail energy markets on an annual basis until 2025. This allows NRAs to identify gaps and areas for improvement in their respective national retail markets and to adopt and implement good practices.

2.6 Flexibility

We need to organise electricity markets in a more flexible manner and to fully integrate all market players in decentralised markets, including producers of renewable energy and providers of new energy services, energy storage and flexible demand. This also requires the modernisation of distribution networks and their development into smart grids in order to enable decentralised generation and energy efficiency.

This then calls for increased digitalisation, which in turn requires ensuring adequate protection against cybersecurity risks by implementing suitable rules. Additionally, specific measures are needed for setting up simplified and streamlined authorisation procedures for small decentralised and/or distributed generation. Finally, this implies market-based incentives to unlock the market for demand-response.

2.7 Significant and recurring work

Some of our work is recurring precisely because of high public interest and appreciation by our member NRAs. Customers are at the very core of CEER's Strategy and always a primary focus, therefore consumer issues are enshrined in the 2025 Work Programme.

CEER will also organise its annual Customer Conference in 2025.

CEER will follow up on discussions still ongoing as of the preparation of this Work Programme such as the finalisation of the Enduring Market Design Paper.

CEER will also follow up on conclusions from major events such as the 2024 Copenhagen Forum.

CEER will continue its international relations with regulators across Europe and the world.

- CEER will continue working on the [EU4Energy project](#), which brings regulatory expertise and capacity building to the Eastern Partnership countries;
- CEER will continue to develop dialogue and exchange best regulatory practices with non-EU regulators and associations of also non-EU energy regulators, to broaden the views.

CEER has consistently undertaken work on several important areas and hopes to continue this valuable work in 2025, building stronger ties with other European regulatory bodies in disciplines related to energy regulation, including financial regulation, competition authorities and telecommunications regulation.

Apart from other, a number of significant recurring reports are to be prepared during 2025:

- CEER will cooperate with ACER to deliver a comprehensive monitoring report on the development of Europe's wholesale and retail markets in electricity and natural gas. Monitoring consumer empowerment and retail markets developments are core tasks of regulatory authorities across Europe and of ACER, and CEER contributes particularly in these areas. This joint ACER-CEER Market Monitoring Report is a key reference for the European Commission, EU agencies and other policymakers and will continue to be an important part of CEER and ACER's work in 2025;
- CEER will deliver an annual report on the regulatory frameworks of European energy networks, surveying implemented regulatory regimes;
- CEER will prepare its Self-Assessment Status Report 2025 for the Roadmap to 2025 Well-Functioning Retail Energy Markets.

3 Questions for consultation

The purpose of this public consultation is to increase transparency and to provide energy regulators with valuable feedback from parties interested in shaping regulators' priorities.

The present document will be open for public consultation **until 12 August 2024**.

We would, in particular, be interested in views on the following **questions for public consultation**:

- CEER proposes that the 2025 Work Programme should focus on the above-mentioned six priority areas from the 2022-2025 CEER Strategy. While the areas themselves were consulted upon in the draft strategy public consultation, do you support how these areas flow into the draft 2025 Work Programme?
- Within each priority area, do you think the Work Programme focuses on the right deliverables or should some be deleted, or others added? (Please note that not every aspect in each of the six core areas would be addressed in a single year's work programme.)
- On the individual work items (listed in the consultation paper) do you have any specific comments?

Stakeholders are invited to participate in the public consultation via a dedicated [online questionnaire](#) on the CEER website.

4 DRAFT CEER WORK ITEMS FOR 2025

No.	Sector	Title	Description/output	Outcome	Strategy core area	Expected start time	Expected end time
1	Customers and Retail Markets	Concept title: "Transparency and Comparability in the Retail Market." Concept subtitle: "Working Towards Well-Informed Decisions with real Comparable Offers"	Energy is inherently complex, often resulting in transparency issues. Recent developments, such as dynamic pricing contracts and energy sharing, as well as existing features such as termination fees and bundle products, further complicate the comparison of different energy products. Moreover, the demand-side response required to facilitate the energy transition necessitates additional knowledge and effort from consumers to fully grasp the ins and outs of the offers they subscribe to. This CEER deliverable aims to cover these critical topics by sharing expertise between NRAs and providing recommendations and/or guiding principles.	Consumer empowerment.	Consumer-centric design	Q3 2024	Q2 2025
2	Customers and Retail Markets	ACER-CEER Energy Retail Markets and Consumer Protection Report	The annual ACER-CEER Market Monitoring Report aims to monitor consumer empowerment and retail markets developments across Europe. CEER will cooperate with ACER to deliver a comprehensive monitoring report to the European Parliament, investigating progress on the national implementation of European legislation focusing on consumer protection and empowerment, as well as the consumer experience in European energy markets. The report will include detailed insights on retail market developments, such as prices, price regulation measures and market structures, as well as relevant and new consumer issues	Monitoring consumer empowerment and retail markets developments are core tasks of regulatory authorities across Europe and ACER. This Joint Monitoring report is an established CEER activity and key reference work for the European Commission, EU Agencies and other policy makers.	Consumer-centric design	Q1 2025	Q4 2025

No.	Sector	Title	Description/output	Outcome	Strategy core area	Expected start time	Expected end time
			such as energy poverty and active energy consumption. The primary data sources for the report consist of the national indicators and surveys conducted by CEER. Beyond presenting the key results of our assessment of the functioning of the Internal Energy Market (IEM) in 2024, the MMR also contains recommendations on how to address the remaining identified barriers to the completion of the IEM.				
3	Distribution Systems	Smart Grid Indicators joint paper after the Copenhagen Forum	Following the publication of the joint ACER-CEER guidance paper (June 2024), the goal is to write a more in-depth paper, if possible, in consultation with all stakeholders to identify and define all pertinent network performance indicators (TSO and DSO) that can be used for regulatory purposes. The paper would also propose an inventory of all indicators, a short list of the most relevant ones, and, if need be, indicators that could be commonly defined at European level.	Starting from Art. 59(1)(l) of Directive 2019/944 of June 5, 2019 and leveraging the work done in the past (ERGEG 2009-2010 paper on smart grids and CEER 2012 and 2014 status review reports on smart grid developments), the goal is to build a comprehensive framework regarding performance evaluation indicators with respect of energy policy objectives and as one of the pieces of the regulatory framework puzzle.	All	Q1 2025	Q4 2025
4	Distribution Systems	National flexibility needs assessments either on DSO level	The new EMD regulation prescribes a national flexibility needs assessment that has to be submitted roughly within two years of the entry into force of the new rules. Therefore, ENTSO-E, EU DSO Entity and ACER will prepare together a methodology which should already be available sometime during next year. This deliverable would aim	Support for NRAs to develop their national flexibility needs assessment reports	Flexibility	Q3 2025	Q4 2025

No.	Sector	Title	Description/output	Outcome	Strategy core area	Expected start time	Expected end time
			to provide practical insight for NRAs to prepare the first flexibility needs assessment.				
5	Distribution Systems	Grid connection capacity challenges	As was already reported repeatedly by the Distributions Systems working group, many MS and their DSOs face challenges in connecting ever-increasing RES production and demand. Since the grid buildout cannot keep pace with the speed of demand increase, alternative tools and measures have to be used to tackle bottlenecks. This deliverable aims to dive deeper in best practices on how to allocate already existing capacity in a more efficient manner. National implementation of a flexible connection agreement framework could also be explored.	Support for NRAs to acquaint themselves with new/innovative ways and best practices (if any) to manage grid bottlenecks	Sustainable and efficient infrastructure	Q1 2025	Q4 2025
6	Distribution Systems	A new look at distribution network development plans	Since distribution infrastructure is a top EU priority (see EU Grid Action Plan) and considered a major barrier to the energy transition, distribution network planning should be re-examined from the following aspects: (i) status of Clean Energy Package (CEP) implementation; (ii) new developments: a) anticipatory investments, b) new rules in the demand response network code, and c) AFIR; and iii) in relation to financing.	Analysis identifying key recommendations on how to develop national DNDP frameworks	Sustainable and efficient infrastructure	Q1 2025	Q4 2025
7	Distribution Systems	CEER Benchmarking Report 7.1 on the Continuity of Electricity and Gas Supply	Data update of interruption indicators for 2019, 2020, 2021, 2022 and 2023.	This is the follow-up to a key reference document used internationally to assess the performance of energy systems.	Sustainable and efficient infrastructure	Q1 2025	Q4 2025

No.	Sector	Title	Description/output	Outcome	Strategy core area	Expected start time	Expected end time
8	Electricity	4 th unsupported RES report	Update of the paper on how RES electricity is handled in MS after their support time ended.	It is essential to know and have examples of how MC handle RES after the support time ended.	Decentralised and local energy	Q2 2025	Q4 2025
9	Electricity & Gas	Regulatory Frameworks Report of European Energy Networks 2025	This report provides a general overview of the regulatory regimes applied in 2024 and the required efficiency developments.	This report is part of series of annual reports drafted and issued by the Council of European Energy Regulators (CEER). It provides a general overview of the regulatory systems for electricity and gas networks (TSOs and DSOs) in CEER member countries for the respective year.	Sustainable and efficient infrastructure	Q1 2025	Q4 2025
10	Market Integrity and Transparency	Financial Regulation and the links to REMIT	<p>Wholesale energy markets have their own dedicated regulation to address market abuse and transparency – REMIT. However, the link between REMIT and financial regulation has been strengthened through the new framework established in REMIT II, when its scope has been extended to wholesale energy products that are also financial instruments, which were previously the sole competence of financial regulation. Hence, REMIT II also reinforced cooperation between energy and financial regulators, who must regularly coordinate their actions to ensure proper energy market functioning from a regulatory perspective.</p> <p>Consequently, with this ongoing activity, CEER will continue to monitor the developments in financial regulation and</p>	In the past, there have been some attempts to revise the existing legislation in a restrictive way and replace energy regulators with financial regulators in supervisory tasks for the concerned products. CEER stated publicly in its response to the European Securities and Markets Authority's (ESMA) Consultation Paper on MiFID II review report on position limits and position management that this would be inappropriate, inconsistent, and inefficient considering the experience	Well-functioning markets	Q1 2025	Q4 2025

No.	Sector	Title	Description/output	Outcome	Strategy core area	Expected start time	Expected end time
			provide an opportunity for NRAs to exchange their experiences when cooperating with financial regulators.	gained in this field by energy regulators. Although REMIT II establishes a new framework with a broader scope, which increases the competences of energy regulators, recognising their expertise, this deliverable is maintained in case further public actions are needed in this respect (e.g. responses to public consultations, position papers, official letters...) and also to monitor the close cooperation expected between national and financial regulators.			
11	Regulatory Benchmarking and Legal	Guidelines of Good Practice of Regulatory Impact Assessment	The objective is to develop a set of Guidelines on Regulatory Impact Assessment (RIA). It will use the results of the Benchmarking Report on RIA methodologies to share best practices and to create a common frame of reference on the subject for European regulators.	Regulatory impact assessments (RIA) should be considered not as an end in themselves but as the means for supporting efficient and necessary regulatory decision-making. Overall, an effective RIA methodology supports regulators in promoting market functioning and value-for-money consumers. RIA can help regulators anticipate desired benefits and unwanted costs of	Well-functioning markets	2024	Q4 2025

No.	Sector	Title	Description/output	Outcome	Strategy core area	Expected start time	Expected end time
				regulatory action, thus supporting adaptive and efficient regulation. Alongside traditional RIA approaches, issues related to sustainability goals and innovation present new challenges for the design and use of RIAs to support regulatory decisions – for example, regulatory sandboxes or pilot projects can be seen as useful tools for impact assessment in the context of a regulatory approach to innovation. The study will enable regulators to share the best practices on RIA.			
12	Regulatory Benchmarking and Legal	Consultation on Guidelines on Regulatory Impact Assessment	With a draft in hand, the fourth phase opens up the process to a wider audience through a public workshop or consultation. This guarantees transparency and inclusivity of the process, while giving a broader range of stakeholders the opportunity to review and comment on the draft guidelines. The feedback gathered from this public engagement is invaluable, as it provides diverse viewpoints and potential improvements. This phase is crucial to ensure that the guidelines are unbiased and accepted and valued by the wider community.	Regulatory impact assessments (RIA) should be considered not as an end in themselves but as the means for supporting efficient and necessary regulatory decision-making. Overall, an effective RIA methodology supports regulators in promoting market functioning and value-for-consumers' money. RIA can help regulators anticipate desired benefits and unwanted costs	Well-functioning markets	2024	Q4 2025

No.	Sector	Title	Description/output	Outcome	Strategy core area	Expected start time	Expected end time
				of regulatory action, thus supporting adaptive and efficient regulation. Alongside traditional RIA approaches, issues related to sustainability goals and innovation present new challenges for the design and use of RIAs to support regulatory decisions – for example, regulatory sandboxes or pilot projects can be seen as useful tools for impact assessment in the context of a regulatory approach to innovation. The workshop will enable regulators to share the best practices on RIA.			
13	Regulatory Benchmarking and Legal	Public Workshop on NRA independence in a multi-sectoral environment	This workshop will serve to discuss the results of the CEER report on NRA independence in a multi-sectoral environment. We expect that NRAs' tasks will increase as public and political sentiment swings towards stronger regulation in some areas – for instance, we are seeing these tendencies in the areas of security of supply, energy efficiency, and renewable energy. The development of a comprehensive whole-system approach will require regulation at the margins and interfaces of various sectors, such as EVs. Furthermore, innovation and new business models will necessitate that regulation be swiftly developed. An overview	This deliverable examines how NRAs deal with innovation and use digitalisation in their organisational setup. It also addresses the evolution of NRAs as organisations. At a meta level, the deliverable pertains to all CEER core areas, enabling NRAs to deliver on all of them. The report is meant as a structured analysis in the first part and will rely heavily on case studies, which can	Well-functioning markets	2024	Q3 2025

No.	Sector	Title	Description/output	Outcome	Strategy core area	Expected start time	Expected end time
			of tasks that are outside the 'core' regulatory business outlined in the Directives will provide insight into such recent developments. This overview could also indicate how NRAs are managing to cope with the issue of maintaining their independence in the face of such rapid developments.	serve as examples of good practices, in the second part.			
14	Gas	LNG terminals: a new role in the framework of decarbonization?	CEER will study how LNG terminals could play a role in the decarbonisation process through different alternatives, including bio LNG, e-LNG, pure hydrogen, ammonia, Liquid Organic Hydrogen Carriers (LOHC), synthetic fuels, CCUS... CEER will gather and analyse information about adaptation projects of LNG terminals in Europe, as well as terminal projects related to new energy carriers. This analysis is based on the information obtained from regulators, LSOs and project developers, identifying possible barriers to decarbonisation and providing solutions to overcome them. In addition, CEER will analyse whether it would be convenient to develop regulations that encompass different types of terminals.	LNG plays a relevant role in Europe, being considered as a critical source of security of supply and market competition for the European energy market. With this deliverable CEER plans to study how terminals can contribute to decarbonisation, considering various options, in the framework of the Hydrogen and Gas Decarbonisation package. In terms of outcomes, CEER will analyse whether it would be convenient to develop regulations that encompass different types of terminals.	Well-functioning markets and Sustainable and efficient infrastructure	2024	Q4 2025
15	Gas	Concept title: " How to implement the Decarbonisation Package in relation to regulation of hydrogen and biomethane"	CEER will analyse the different possibilities for the implementation of the Decarbonisation Package, that has been published in 2024. Among the main issues: 1) access conditions, 2) unbundling, 3) derogations.	Future outlook of biomethane and hydrogen in light of the recently adopted Hydrogen Decarbonisation and Gas Market package	Well-functioning markets and energy system integration	2024	Q4 2025

5 NEXT STEPS

Following a review of the comments received to this consultation, CEER aims to publish the final 2025 Work Programme in January 2025.

About CEER

The Council of European Energy Regulators (CEER) is the voice of Europe's national energy regulators. CEER's members and observers comprise 39 national energy regulatory authorities (NRAs) from across Europe.

CEER is legally established as a not-for-profit association under Belgian law, with a small Secretariat based in Brussels to assist the organisation.

CEER supports its NRA members/observers in their responsibilities, sharing experience and developing regulatory capacity and best practices. It does so by facilitating expert working group meetings, hosting workshops and events, supporting the development and publication of regulatory papers, and through an in-house Training Academy. Through CEER, European 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.

In terms of policy, CEER actively promotes an investment friendly, harmonised regulatory environment and the consistent application of existing EU legislation. A key objective of CEER is to facilitate the creation of a single, competitive, efficient and sustainable Internal Energy Market in Europe that works in the consumer interest.

Specifically, CEER deals with a range of energy regulatory issues including wholesale and retail markets; consumer issues; distribution networks; smart grids; flexibility; sustainability; and international cooperation.

More information is available at www.ceer.eu