



Evaluation of Responses

Stakeholder comments on CEER Strategy 2026-2029

“Ensuring regulatory stability and citizen engagement amidst change to reach the decarbonisation goals efficiently”

Ref: C25-SSG-##-##-#

1 Overview

This document presents Council of European Energy Regulator’s (CEER) response to the stakeholder consultation exercise on the draft CEER’s Strategy 2026-2029 *“Ensuring regulatory stability and citizen engagement amidst change to reach the decarbonisation goals efficiently”* (the Strategy).

The [consultation on the Strategy](#) was published on the CEER website and open for responses from 27 June until 22 August 2025. The consultation sought feedback on four principal questions related to the identification of key trends and challenges, consumer empowerment, continuity from the previous CEER Strategy, and potential missing priorities for regulators.

The purpose of the public consultation was to gather stakeholder feedback to help refine the identified strategic priorities in the Strategy and to inform the development of CEER’s future work programmes. The consultation results will also support the ongoing discussions within the CEER Board and General Assembly on the proposed revisions to the draft Strategy, ensuring that stakeholder comments are appropriately addressed.

The Strategy builds on CEER’s long-standing commitment to empower consumers and foster well-functioning, resilient energy markets by reaffirming the importance of regulatory independence, collaboration, and the effective implementation of existing frameworks. In response to evolving megatrends, the Strategy identifies three strategic priorities:

- (1) optimising market-oriented solutions to deliver best results for consumers and the energy system;
- (2) empowering and protecting consumers, while promoting affordability and accessibility; and
- (3) deepening the integration of a decarbonised energy system.

Each strategic priority is further detailed through a set of focus areas that are essential to achieving CEER’s overall objectives for 2026-2029.

CEER’s three strategic priorities and respective focus areas

<p>Optimising market-oriented solutions to deliver best results for consumers and the energy system</p> <ul style="list-style-type: none"> • Emphasizing the importance of market mechanisms • Optimising existing infrastructure • Incentivising efficient investment in grid expansion 	<p>Empowering and protecting consumers, while promoting affordability and accessibility</p> <ul style="list-style-type: none"> • Empowering and protecting consumers • Monitoring the emergence of new actors and services 	<p>Deepening the integration of a decarbonised energy system</p> <ul style="list-style-type: none"> • Supporting security of supply and market resilience • Facilitating decarbonisation and gas-power system integration • Encouraging efficient infrastructure use and future-proof investment • Promoting regulatory clarity and innovation
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Given a final strategy, CEER's work programme items for the period 2026-2029 will prioritise activities that contribute to achieving our strategic objectives. That is to say, all CEER deliverables and activities should contribute, directly or indirectly, to outcomes that advance these goals.

2 Responses to Questions

2.1 Participating Stakeholders

A total of ten stakeholders submitted responses, representing a broad spectrum of market actors, including energy industry associations, consumer organisations, energy companies, academia, and system operators. They have provided feedback in response to four key questions:

1. To what extent have we captured the key ongoing and anticipated trends and challenges as part of the changing energy system against the backdrop of geopolitical challenges?
2. To what extent do our proposed strategic priorities protect and empower consumers in light of the identified opportunities and challenges following the energy crisis?
3. Does our strategy reflect new challenges while also continuing the path of the previous strategy?
4. Please indicate if you identify any missing priority on which regulators should focus.

The full list of stakeholders that did not request confidentiality is available in Annex 2. **CEER expresses its sincere appreciation to all stakeholders who participated in the consultation and provided valuable input.**

2.2 Stakeholder Feedback and Comments

Overall, stakeholders welcomed the Strategy and agreed with its overall direction and three strategic priorities. Respondents considered the proposed focus areas relevant and well aligned with the key challenges of the evolving energy landscape.

Stakeholders confirmed that CEER correctly identified the main trends and challenges shaping the energy transition, highlighting the importance of flexibility, infrastructure efficiency, affordability, and technological neutrality. The consumer empowerment and protection dimension was widely supported.

Feedback on continuity with the previous Strategy recognised that CEER successfully builds on its existing work while responding to new geopolitical, market, and digital developments.

Under additional priorities, respondents called for stronger attention to local resilience, cross-sector cooperation, energy-system complementarity, and the integration of renewable gases. They also highlighted the importance of public trust and transparent communication, consumer protection, and cost-reflective frameworks to promote affordability, efficient system integration, and continued market monitoring.

In the table below is a summary of the most relevant stakeholder considerations and suggested topics emerging from the public consultation, as well as CEER's responses.

Stakeholder considerations and suggested additional topics	CEER Response
<p>Flexibility, storage, and grid infrastructure – stakeholders called for stronger recognition of flexibility, storage, and grid expansion as prerequisites for system resilience. The role of renewable gases in seasonal and daily flexibility was highlighted.</p>	<p>CEER agrees that flexibility and infrastructure efficiency are crucial. The final Strategy reinforces references to investments in flexibility, efficient use of existing assets, and coordinated grid planning. CEER will follow up with specific deliverables in the Work Programmes 2026-2029.</p>
<p>Renewable and low-carbon gases – stakeholders highlighted the importance of renewable gases and hydrogen for flexibility and decarbonisation. Fit-for-purpose grid-connection frameworks and dynamic tariffs were mentioned.</p>	<p>CEER recognises the importance of renewable and low-carbon gases. The focus remains on integration and system efficiency, not promotion of specific fuels.</p> <p>CEER will follow up with specific deliverables in the Work Programmes 2026-2029.</p>
<p>Technological neutrality – stakeholder requested explicit reference to low-carbon technologies and a balanced approach between centralised and decentralised solutions.</p>	<p>CEER agrees with the importance of maintaining technological neutrality to ensure cost-efficient decarbonisation. The final Strategy already takes a technology-neutral approach.</p> <p>The Strategy's consumer-centric and system-efficiency focus inherently covers both centralised and decentralised approaches.</p>
<p>Consumer affordability and competitiveness – stakeholders stressed affordability and competitiveness. The importance of predictable, cost-reflective tariffs to safeguard industrial competitiveness was mentioned.</p>	<p>CEER agrees that affordability and competitiveness are key to a fair and sustainable energy transition. CEER considers consumer protection and industrial competitiveness as complementary objectives when guided by cost efficiency and regulatory predictability.</p>
<p>Consumer empowerment and protection – stakeholders welcomed the consumer-centric focus but urged CEER to balance empowerment with simplicity, fairness, and protection of vulnerable consumers.</p>	<p>CEER maintains its consumer-centric approach as the foundation of the Strategy. The Strategy clarifies that consumer-centred regulation also benefits the whole energy system and operators through efficient market design. Consumer empowerment, data protection, and enforcement remain core areas for future work.</p>

Stakeholder considerations and suggested additional topics	CEER Response
<p>Guarantees of Origin (GOs) and disclosure – stakeholders requested inclusion of GOs and disclosure as a strategic area.</p>	<p>CEER recognises the relevance of GOs but informs that this cannot become a CEER strategic priority because in several Member States NRAs are not competent authorities for GOs.</p> <p>CEER will follow up with specific deliverables in the Work Programmes 2026-2029.</p>
<p>DSO role and local resilience – stakeholders stressed the importance of DSOs in flexibility and resilience.</p>	<p>CEER reaffirms DSOs’ importance within the consumer-to-system interface. The Strategy explicitly notes efficient use of networks and coordinated planning.</p> <p>CEER will follow up with specific deliverables in the Work Programmes 2026-2029</p>
<p>Public acceptance and communication – stakeholder underlined the risk of public backlash against costs of transition.</p>	<p>CEER agrees to explicitly recognise the issue of public acceptance as a regulatory concern linked to affordability and transparency. CEER decided not to make this a separate priority but to integrate it in discussions on consumer engagement. Possible link to communication activities in Work Programmes.</p>
<p>Regulatory independence and cooperation – stakeholders stressed independence of NRAs and cross-NRA cooperation.</p>	<p>CEER reaffirms independence and cooperation as key prerequisites. This will continue to be a recurring theme across Work Programmes.</p>
<p>Digitalisation and privacy – highlighted privacy-by-design and cooperation with data-protection authorities.</p>	<p>CEER has already included references to digitalisation and data governance in the Strategy. Future Work Programmes will examine cross-regulator collaboration and consumer-data protection.</p>
<p>Cross-sector governance – encouraged collaboration with other regulators (telecoms, data, finance).</p>	<p>CEER agrees and see possibilities for cooperation through workshops and joint dialogues.</p> <p>CEER will follow up with specific deliverables in the Work Programmes 2026-2029.</p>
<p>Electrification and taxation – stakeholder called for greater promotion of electrification and climate-aligned taxation.</p>	<p>CEER recognises electrification as part of efficient decarbonisation but clarifies that taxation is outside regulators’ remit. The Strategy now emphasises investment efficiency without addressing fiscal policy.</p>

Stakeholder considerations and suggested additional topics	CEER Response
<p>Incentive regulation and tariff design – recommended addressing CAPEX bias and cost-reflectivity.</p>	<p>CEER acknowledges these points and notes they align with ongoing regulatory benchmarking work. The Strategy highlights the need for efficient and cost-reflective network investment frameworks.</p>
<p>Energy renovation and heating – stakeholders called for more emphasis on heating and energy renovation.</p>	<p>CEER acknowledges this as important but too detailed for the Strategy. It is reflected in references to flexibility, demand-side management, and system integration, with further exploration planned under Work Programmes.</p>
<p>Decommissioning of gas networks and consumer protection – stakeholder requested that CEER address gas-network phase-out.</p>	<p>CEER agrees this is an emerging issue and will include it in Work Programme discussions under consumer protection.</p>
<p>Green claims and transparency – stakeholders referenced CEER’s previous work on trustworthy green offers and encouraged to continue this work.</p>	<p>CEER confirms continued monitoring of green-claims regulation. CEER will follow up with specific deliverables in the Work Programmes 2026-2029</p>
<p>Complementarity of electricity and gas systems – stakeholder emphasised complementarity between electricity and decarbonised gases for supply security.</p>	<p>CEER ensures balanced treatment of electricity and gas across the Strategy. The focus remains on renewable and low-carbon gases, not fossil fuels.</p>
<p>Market monitoring and implementation of consumer rights – Stakeholders encouraged CEER to continue retail-market monitoring and support enforcement of EU consumer rights and affordability.</p>	<p>CEER confirms continuation of its retail-market monitoring and data-collection work.</p>

3 Conclusions

The consultation confirmed that the Strategy's three priorities remain appropriate and well aligned with the regulatory challenges of the coming years. Stakeholders welcomed the emphasis on regulatory stability, consumer empowerment, affordability, and flexibility, while highlighting the need to better reflect technological neutrality, renewable gases, local resilience, and cross-sector coordination.

In light of the feedback received, CEER refined the draft Strategy to provide clearer references to:

- the importance of efficient use of existing infrastructure and cost-effective grid investment,
- the link between market functioning and social acceptance of the energy transition.

At the same time, a number of more detailed or technical stakeholder suggestions were considered beyond the scope of a high-level strategic document and will instead be taken forward in CEER's future Work Programmes 2026-2029, ensuring continuity between strategic guidance and implementation.

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*
1. L'Union professionnelle des industries du gaz (UPRIGAZ)
2. European Federation of Local & Regional Energy Companies (CEDEC)
3. Association of Issuing Bodies (AIB)
4. Uppsala University
5. Électricité de France (EDF)
6. International Federation of Industrial Energy Consumers (IFIIEC Europe)
7. European Biogas Association (EBA)
8. The European Consumer Organisation (BEUC)

* Respondents who marked their answers as confidential are not included in the list.