



PAPER

CEER views on the European Commission's legislative proposal on future-proofing electricity bills

17.09.2026

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Amendment of the Electricity Regulation (EU) 2019/943

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1 Network charge design must remain within the competence of independent regulatory authorities

The Council of European Energy Regulators (CEER) acknowledges the overall objectives of the proposal for a Regulation amending Regulation (EU) 2019/943 on the internal market for electricity. CEER takes this opportunity to provide initial feedback on the proposed revision and looks forward to contributing further to the legislative discussion. Network charges fall within the core competence of independent national regulatory authorities (NRAs), and any amendment to the existing framework should preserve that competence.

CEER supports the European Commission's intention to improve the utilisation of grid infrastructure and advance the development of smart grids. Smart meters allow households and businesses to monitor consumption, respond to price signals and thereby reduce their bills. Better data and system management can reduce congestion and optimise the use of existing infrastructure. Digitalisation supports demand-side flexibility and helps align electricity consumption with periods of lower prices or higher renewable generation.

Grids are a key enabler of electrification. The European Commission rightly highlights that expanding and modernising electricity networks is essential for the energy transition. It is equally important to address connection delays. Reducing long waiting times for new grid connections can accelerate renewable energy projects, industrial investments and electrification. Furthermore, ensuring that electricity is not penalised compared with gas supports Europe's climate objectives and reduces import dependence.

CEER recognises the importance of adapting network charge frameworks to the evolving electricity system to ensure the energy transition. Electrification, renewable generation, storage, demand-side flexibility and digitalisation all require tariff methodologies to remain fit for purpose. Equally, the decentralisation of generation and consumption require regulatory adaptability and proximity, to ensure efficient local solutions can be taken forward. In this context, transparency, appropriate incentives and efficient use of network infrastructure are legitimate and important objectives.

Network charges are an essential component of the electricity market framework. NRAs have more than 25 years of experience in setting them so that grid costs are recovered in a fair, transparent and efficient manner, while supporting safe network operation, flexibility and investment.

The design of network charges is closely linked to the specific characteristics of national electricity systems. Network topology, generation mix, congestion patterns, consumption profiles, the structure of the regulated network operators and the existing regulatory framework differ significantly between Member States. These differences may also exist within Member States, between transmission and distribution networks or between different categories of system users.

Future-proofing network charges therefore requires a careful balance between common European principles and national regulatory discretion. European Union (EU) law already establishes the core principles of cost-reflectivity, transparency, non-discrimination and efficient network use; NRAs should remain responsible for applying those principles to their respective systems while taking stakeholder input into account through established consultation processes.

This is particularly relevant where the proposal appears to introduce requirements for specific tariff elements, including locational investment signals, capacity-based tariff elements or time-differentiated network charges, as well as special tariff regimes for particular categories of network users. Such elements may contribute to more efficient network use in certain circumstances, but their effectiveness depends on the objectives pursued and the characteristics of the relevant network. A mandatory uniform approach across all EU networks and all network users could therefore produce unintended consequences, including ineffective or distortive price signals, inappropriate distributional effects or adverse impacts on network users that cannot adjust their consumption or location decisions.

Finally, given the scale and potential implications of the proposed changes, CEER considers that the legislative process should be supported by a clear assessment of the expected impacts, including the principles of proportionality, subsidiarity and necessity. The proposal covers a range of issues that may affect tariff methodologies, network operators, system users and the distribution of costs between consumer groups.

Against this background, CEER supports the objectives of a more efficient, transparent and future-proof electricity system. CEER nevertheless recommends that the final framework preserves the responsibilities of NRAs, recognises national and system-specific circumstances, and avoids detailed harmonisation where this is not necessary to achieve the objectives of the Regulation.

2 Key recommendations

Guarantee NRA competences in designing network charges

CEER recommends that the Regulation establishes common principles without prescribing detailed tariff structures. The **choice and design of tariff elements must remain within the competence of NRAs**, given their role in assessing national circumstances, network characteristics and network users' ability to respond to price signals. The **choice and detailed design of tariff elements should remain within the competence of NRAs, which are** based on the core principles of transparency, cost-reflectivity and non-discrimination, and include all three steps of the tariff-setting process.

CEER has significant reservations regarding delegated acts establishing harmonised tariff structures [Article 61(5a)]. The EU Agency for the Cooperation of Energy Regulators (ACER) best-practice reports already provide useful guidance and could be expanded to cover the issues raised in the European Commission proposal. Binding harmonisation could limit NRAs' ability to develop tariff methodologies adapted to national network systems and raise concerns regarding proportionality, subsidiarity and regulatory independence (cf. Section 3).

Reassess the actual need for further EU legal provisions on smart grids and data

CEER considers that implementing acts on smart-grid indicators and detailed data-reuse requirements should be approached cautiously [Article 61(5a, 5b)]. The existing exchange of best-practices among NRAs and network operators is working effectively to support the development of smart-grid performance indicators without imposing additional burdensome data-collection obligations. CEER welcomes the objective of establishing a clear legal basis for the sharing and analysis of data among transmission system operators (TSOs) and distribution system operators (DSOs) to support research, innovation and efficient system operation [Article 18a (4)]. We recommend a lighter regulatory approach than detailed implementing acts to allow more room for innovation and adaptation (cf. Section 4).

Safeguard transparency while ensuring better use of available data and reducing administrative burden

CEER supports the objective of improving transparency [Article 18(5)], drawing on ACER best-practice reports. Additional data requirements should be based on standardised definitions, be proportionate to the expected benefits and avoid unnecessary administrative burdens for NRAs and network operators. CEER therefore recommends promoting transparency while leaving detailed elements to ACER guidance (cf. Section 5).

Calibrate DSO efficiency benchmarking to the structure of the national system

CEER supports benchmarking where it provides useful information for revenue-setting and tariff regulation. However, a mandatory DSO benchmarking exercise at a fixed four-year frequency may not be appropriate in all Member States. Instead, the timing should be aligned with national regulatory periods, and NRAs should be able to derogate from this measure where the structure or heterogeneity of the DSO sector means that a meaningful comparison cannot be conducted (cf. Section 6).

NRAs best placed to deploy locational investment signals, capacity-based tariff elements and/or time-of-use network charges

CEER particularly recommends retaining NRAs' discretion in relation to locational investment signals, capacity-based tariff elements and time-differentiated network charges. Although these instruments are highly relevant, their appropriate combination and added value will differ between Member States. Capacity-based tariff elements and time-differentiated network charges can pursue overlapping but distinct objectives, and the appropriate balance between them will depend on the tariff objectives and the characteristics of the network users concerned. A capacity-based tariff element may support predictable cost allocation, but it may also weaken incentives for flexibility where part of the network charge is not affected by demand response. Their introduction should therefore depend on a regulatory assessment of whether they are necessary, appropriate and capable of producing an effective response from the relevant network users (cf. Sections 7, 8 and 9).

Empower NRAs to assess special tariff regimes

CEER supports the possibility of applying special tariff regimes and the adoption of measures to address grid connection constraints. However, the Regulation **should not identify specific categories of users** that may benefit from such arrangements. The explicit listing of categories could create an expectation that special tariffs or priority access should automatically apply to those users. NRAs should instead retain the ability to determine, based on objective and transparent criteria, whether such measures are justified in the national context and compatible with **cost-reflectivity, neutrality, non-discrimination and efficient use of the grids** (cf. Section 10).

Overall, CEER supports the objective of developing more efficient and future-proof network charges. The Regulation that will be adopted should, however, focus on establishing clear common principles rather than prescribing detailed tariff structures. It should preserve NRA independence, respect national specificities, ensure that any exception is transparent and justified, and apply the principles of proportionality, subsidiarity and efficient use of the grids. This approach would allow network charges to support electrification, flexibility and efficient network investment while safeguarding fair cost allocation and consumer protection.

3 Strengthen NRAs' competence in tariff setting through best-practice sharing instead of delegated acts

Article 61(5a) empowers the European Commission to adopt delegated acts to set out guidelines on a common structure and harmonised methodology on electricity network charges. It aims at establishing "harmonised tariff structures for electricity, including detailed conditions under which regulatory authorities may introduce separate network charge regimes for specific categories of system users [...] and harmonised rules on the procedural and substantive requirements for the public consultations".

Under EU legislation, ultimate responsibility for network tariff design lies with independent NRAs. Article 59(1)(a) of Directive (EU) 2019/944 provides that NRAs have "the duty to fix or approve, in accordance with transparent criteria, transmission or distribution tariffs or their methodologies, or both". NRA independence is essential to ensure that these powers are exercised impartially and transparently. The Court of Justice of the European Union has also made clear in recent judgments that NRAs cannot be subject to external instructions from other public entities when exercising their core regulatory powers.

The proposed binding EU guidelines on harmonised tariff structures and methodologies in Article 61(5a) could shift decision-making powers away from NRAs towards the European Commission. This would risk compromising regulatory independence and creating uncertainty for regulatory frameworks and market participants.

CEER agrees that tariff methodologies must follow robust core principles, as reflected in ACER best-practice reports and in current Regulation (EU) 2019/943. Article 18(10) already requires NRAs to take ACER's best-practice report into consideration when designing network tariff methodologies.

CEER considers that the proposal in Article 61(5a), by changing the core principles anchored in the Electricity and Gas Directives, may endanger NRAs' power to **set efficient network charges**. Such a transfer of competences has not been subject to a full impact assessment and is not justified. In addition, we note a recently published European Commission study on TSO tariff structures across Europe, which does not identify a need to harmonise tariff methodologies.¹

The level of detail proposed in the current Article 18 appears sufficient. Differences between tariff structures generally reflect genuine local specificities, including generation, demand and geographical constraints. Rather than introducing delegated acts, CEER considers that ACER's best-practice reports could be expanded to address the new topics raised in the proposal.

In addition, CEER understands that the proposed guidelines are inspired by the existing EU network code on harmonised transmission tariff structures for gas introduced by European Commission Regulation 2017/460 of 16 March 2017 (TAR NC). However, CEER wants to point out that the provisions of the Transmission Tariff Structures Network Code (TAR NC) are specific to cross-border gas transmission capacity and that they have been subject to a thorough impact assessment and are based on the guidance of NRAs and stakeholders. Therefore, their underlying logic cannot be transposed to the electricity sector.

The TAR NC is justified by the existence of regulated tariffs at interconnection points set by NRAs. Harmonised tariff principles aim at preventing distortions of competition and cross-subsidies between transit and domestic flows. This rationale does not apply to the electricity sector, where network users do not pay tariffs for cross-border capacities. Furthermore, the proposed guidelines would also apply to distribution network charge structures, which have no cross-border relevance.

The European Commission's proposal could create a situation where NRAs' future tariff-setting powers are effectively pre-empted through ad hoc European interventions via either implementing or delegated acts. As a result, responsibility for the design of network tariffs may increasingly shift from NRAs to the European institutions, undermining their independence, and also creating substantial uncertainty for regulatory frameworks and market participants.

- CEER considers that such provisions are major changes to the NRAs core principles of independence as anchored in the Electricity and Gas Directives and endanger their power to set efficient network tariffs. They are not backed by an impact assessment and a clear justification.

¹ Felsmann B., Berei J., Helferich M., Molnár B., Rácz V., Szabó L., Tröger J. & Vékony A. (2026). Study on European electricity TSO tariff structures, incentives for flexibility and efficient investments: Final report. Luxembourg: Publications Office of the European Union.

- CEER has strong reservations regarding the need for, and added value of, a delegated act establishing harmonised tariff structures; **CEER therefore strongly recommends deleting this provision.**
- CEER understands that the objective pursued by the European Commission is to improve the degree of transparency and comparability of electricity network charge structures across EU countries. To achieve this, CEER proposes two alternative measures:
 - **establishing a European template for the publication of transmission and distribution network charges:** instead of specifying the data to be included in such a template (see comments below in Section 5) the Regulation could task ACER with preparing such a template, setting out clear and unified definitions and reference values.
 - **clarifying that special tariff regimes are within the scope of ACER's best-practice reports** specified under Article 8(8).

4 Assess need for further EU legal provisions on smart grids and data

Article 61(5a, 5b) empower the European Commission to adopt implementing acts on smart-grid indicators and implementing acts to set out detailed requirements to enable the reuse of data for research and innovation purposes regarding smart electricity grid indicators and innovation.

CEER notes that the legislative proposal would continue the ongoing work on smart-grid indicators through an ACER recommendation and regular progress reports. This flexible approach, coordinated with NRAs contributing to ACER activities, can effectively adjust to new developments. CEER considers that implementing acts on smart-grid indicators to “measure the uptake and performance of smart and innovative grid technologies and digital solutions in transmission and distribution networks” should be assessed by balancing their added value against potentially burdensome data-collection and publication obligations for network operators and NRAs. They should also be compared with the existing exchange of best practices among network operators and NRAs, which may provide a more efficient route towards the stated objective.

- CEER believes the continued **exchange of best-practices among network operators and NRAs - as in Articles 18a(2) and 18a(3) of the proposed Regulation - is a potentially more efficient and effective path towards the stated objective.**

CEER welcomes the European Commission's initiative to introduce a clear legal framework at EU level for data sharing and analysis among network operators to support the optimisation of the electricity system. However, CEER considers that introducing an implementing act in this area may prove excessively burdensome compared with current practice.

- CEER recommends a **lighter regulatory approach** and considers that including data sharing among DSOs and TSOs in the Regulation is sufficient to establish a legal basis at EU level.

5 Safeguard transparency while ensuring better use of available data and reducing administrative burden

Article 18(5) requires the collection and publication of a comprehensive list of data points on network costs and tariffs.

CEER strongly agrees that transparency is necessary to ensure that system users have a better understanding of the tariff setting process and the costs underlying these tariffs, so as to incentivise network-friendly behaviour.

CEER notes that many of the requested data points are already published in most Member States, which also highlights the importance of transparency for NRAs. In addition, ACER regularly publishes best-practice reports on tariff methodologies, which already provide a good and comprehensive overview of these methodologies and highlights the specific characteristics and challenges of each Member State. The data underlying the report are collected on an annual basis. There are additional reports with accompanying data collections and publications, namely the [CEER Regulatory Frameworks Report](#) and the [ACER report on DSO revenue setting practices](#) with a comprehensive data set in its [annex](#).

CEER points out that including transparency requirements in the Regulation may lead to duplication of transparency requirements since they are already part of the ACER Report. Transparency requirements may evolve over time as our systems decentralise and become increasingly integrated. The focus should continue to be on simplifying processes to ensure efficient operations.

- CEER **welcomes the European Commission's objectives of ensuring greater transparency in the tariff setting process**, as a fundamental tool in guaranteeing public support for the energy transition.
- CEER recommends **avoiding duplication of transparency requirements and simplifying processes**, especially given ACER's existing legal obligation to publish a best-practice report. CEER therefore recommends **promoting transparency while leaving the detailed elements to the ACER guidance report**.

6 Calibrate DSO efficiency benchmarking to the structure of the national system

Article 18(7) of the proposed Regulation introduces a requirement for NRAs to perform a cost efficiency benchmark of their national electricity distribution system operators every 4 years, provided there is more than one DSO nationally.

Benchmarking can provide valuable information to NRAs when assessing the efficiency of network operators and determining appropriate regulatory incentives. CEER therefore supports benchmarking where it adds value, while stressing the complexity of such exercises for both TSOs and DSOs.

As regards the DSO benchmark specifically, in several Member States electricity distribution is entrusted to one very large DSO and to some comparatively very small other DSOs operating in very limited-service areas, which poses challenges to the usefulness of such exercises.

CEER wishes to point out that NRAs already conduct benchmarks among regulated network operators when such studies make sense and provide useful elements to their allowed-revenue setting tasks. Requiring NRAs to systematically conduct costly and resource-intensive benchmarks on a regular basis would result in a waste of resources and would bring no added value to some regulators. Where DSO benchmarks add value, CEER recommends their frequency to be consistent with national regulatory periods to maximise efficiency.

CEER therefore recommends:

- **requiring NRAs to conduct the DSO benchmark in preparation of every new regulatory period, instead of every four (4) years;** the start date and duration of regulatory periods vary from one country to another, and NRAs would need to conduct these comparison studies in anticipation of their revenue-setting decisions;
- **allowing NRAs to derogate from the DSO benchmark** when they can justify that such an exercise cannot be appropriately conducted in their Member State or does not add significant value given, in particular, the degree of heterogeneity among DSOs.

7 NRAs are best placed to assess and decide on locational investment signals

Article 18(2)-point f of the proposed Regulation requires tariff methodologies for network charges to provide locational investment signals.

While CEER recognises that locational investment signals can be a tool for reducing network costs, alleviating congestion, and minimising losses, **the characteristics of national electricity systems vary considerably across Member States**. Factors such as network topology, the extent of (current and expected) congestion, and the profile of network users differ across Member States, making a flexible approach – and the choice of the appropriate regulatory tool – essential.

The differences in grid characteristics between Member States need to be highlighted as they could lead to unintended consequences if a mandatory, one-size-fits-all implementation of locational investment signals applicable to all network users were introduced in the Regulation.

For this reason, the **decision** as to whether and how to implement locational investment signals in network charges **should remain within the discretion of NRAs**, enabling them to apply the regulatory tools suited to the characteristics of their electricity systems.

- CEER recommends retaining NRAs' competence to assess the necessity and appropriateness of locational investment signals, as is currently the case in Article 18(3) of Regulation (EU) 2019/943, which provides that locational investment signals shall be provided **"when appropriate"**.

8 NRAs are best placed to assess and decide on the capacity element

Article 18(2)-point g of the proposed Regulation requires regulatory authorities to incorporate a capacity element into network charges to reduce peak load consumption.

The maximum load of transformers, grid lines and other assets is a relevant driver of network investments costs. For this reason, capacity elements are already commonly implemented across Member States, sometimes tailored to specific user groups.

In the design of use charges for electricity networks, capacity and time-of-use elements are simultaneously complementary and alternative to each other. They are complementary, as both induce network users to flatten their load profile, promoting a more efficient use of the network. But they are also alternative to each other, as they aim at different tariff objectives. While a capacity element limits the individual peak usage, providing network operators with greater predictability of expected load profiles, a time-of-use structure signals periods of system peak demand and stimulates greater adaptability, especially to minimise consumption during system peak.

The choice between the two elements has implications for flexibility and cost allocation. The presence of a capacity element, e.g. in the case of contracted capacity-based tariffs, is often associated with weaker tariff-related incentives for flexibility, since a share of the network bill will not change when providing demand response. However, a capacity element is often regarded as providing a fairer cost allocation across network users who do not rely permanently on the public grid but, nonetheless, require access to the grid during system peak, if necessary. This implies that the appropriate trade-off may be different across Member States, or even for specific user groups. If a specific group has greater potential to provide flexibility, a network charge with a lower capacity element, or none at all, could be the best design choice.

- Given the potential overlap between capacity-based tariff elements and time-differentiated network charges, CEER recommends that **the inclusion of a capacity-based tariff element in the tariff structure be subject to the NRAs' assessment and decision**, as the optimal choice between these elements will depend on the tariff objectives pursued in a Member State or for a specific network user group.

9 NRAs are best placed to assess and decide on time-of-use

Article 18(2)-point h of the proposed Regulation requires regulatory authorities to incorporate time-of-use elements into network charges to reflect the use of the network.

Recital (8) of the proposal for a Regulation explains that “time-of-use elements could be of a static or dynamic nature to incentivise system users to make more efficient use of the network”.

The current provision in Regulation (EU) 2019/943 is similar but has an optional character as it states that “where appropriate, time-differentiated network charges may be introduced to reflect the use of the network”.

CEER agrees with the possible role of time-differentiated network charges in influencing network users’ behaviour, but notes that the **design of time-differentiated tariff elements may be particularly complex and requires local and national specificities to be taken into account** such as, for instance:

- alleviating transmission grid congestion (and thus reducing the need for investment in transmission grids) may no longer be linked to system peak load, but may increasingly depend on generation time-patterns;
- reducing distribution grid congestion (and thus reducing the need for investment in distribution grids) may be linked to “total consumption minus distribution-connected photovoltaic injection”. The time patterns of this metric can significantly differ depending on the nature of the users connected to the local distribution grid (industrial, services or residential).

In addition, it is worth noting that in its latest Electricity Tariffs Best Practices Report, ACER observed that “network tariffs shall increase efficient use of the existing grid by providing price signals for network users to adapt their behaviour. The effectiveness of these price signals depends on the ability of network users to respond to them, the share of network tariffs in the final bill and the corresponding savings. The signals provided by network tariffs co-exist with the signals provided by market prices embedded in the energy component of the electricity bill. Regulators should carefully assess the cumulative effect of such signals on different services. Together, they provide a compound price signal to influence network users’ behaviour at a certain time”.

These specificities, together with the potential overlap between capacity-based tariff elements and time-differentiated network charges, highlight that the **design of time-differentiated network charges should be carefully assessed by each NRA**. Their added value should be balanced against the complexity of applying them and the risk that time-differentiated network charges are ineffective or distortive.

- For these reasons, **CEER recommends retaining NRAs’ competence to assess the necessity and appropriateness of time-differentiated network charges**, as is currently the case in Article 18(7) of Regulation (EU) 2019/943, which provides that time-differentiated tariffs may be introduced “**when appropriate**”.

10 Empower NRAs to assess special treatment of user groups

Article 18(3) of the proposed Regulation introduces the possibility to apply special tariff regimes for specific categories of network users provided NRAs can demonstrate that these users have a lower or higher impact on the cost of electricity networks. Also, Article 18d(1) provides NRAs with the possibility to approve priority grid access for certain categories of network users in case of scarcity in available grid capacity.

Both paragraphs identify some of the categories of users that could benefit from such special tariff regimes (“energy-intensive industries or data centres and energy communities” regarding special tariff regimes and “public sector, social services, energy communities, households, small and medium enterprises, data centres, energy intensive industries or market participants in the transport sector” regarding priority grid access).

CEER considers that these two provisions should not identify specific categories of network users, as explicitly named users may assume that provisions on special tariffs and priority grid access should automatically apply to them. To ensure neutrality, cost-reflectivity, non-discrimination and coherence with national contexts, where NRAs perform this task (grid access), NRAs must be able to determine independently the conditions under which network users may be eligible for such measures.

- CEER recommends **deleting any reference to specific categories of users in Article 18(3) and Article 18d(1) of the Regulation.**

11 Extend connection-related measures to anticipate congestion risk

Article 18d of the proposed Regulation introduces clarifications on NRAs’ competencies to approve measures to help DSOs and TSOs manage grid connection requests in case of network congestion.

CEER notes the explanatory memorandum accompanying the proposed Regulation specifies that “*the proposal concerning grid connection measures in case of network congestion provides further clarifications to the existing right and responsibility of regulatory authorities to adopt measures and set conditions for non-discriminatory, objective and transparent third-party access pursuant to Article 6 of Directive (EU) 2019/944*”.

CEER welcomes this added clarification in the Regulation to the already-existing provisions of Article 6 of Directive (EU) 2019/944. However, the measures that may be approved to address grid capacity congestion should not only come once scarcity in available grid capacity occurs, but also in anticipation of grid congestion.

CEER therefore recommends two improvements to the proposed article:

- CEER calls for Article 18d and Recital 28 to **explicitly state that measures may also be taken to prevent capacity congestion.**
- CEER considers that **Recital 28 should state that Article 18d clarifies existing rules under Article 6 of Directive (EU) 2019/944.**

12 Keep non-distance-related network charges

Article 18(1) of Regulation (EU) 2019/943 in its current wording provides that network charges shall not be distance related.

The European Commission proposal no longer prohibits distance-related network charges. Network charges are kept non-distance-related (using a "postage stamp" pricing model) because electricity flows through a meshed, interconnected grid rather than direct point-to-point lines. Access is granted to the electricity transmission and distribution system, not to an individual electricity generating plant.

Furthermore, arbitrary impacts on existing grid users are to be expected. These network users would be dependent on having a generation facility located in the immediate vicinity to avoid higher network charges. This is particularly critical for industrial companies operating at higher voltage levels, as the conventional generation connected to those grids is increasingly exiting the market. Distance signals can be achieved in the grid connection charges, among other tools, and it is not necessary to apply them here.

- CEER considers that **only non-distance-related network charges enable the free trading of electricity** by decoupling trade transactions from physical grid utilisation and therefore recommends maintaining the prohibition of distance-related network charges in Article 18 of the Regulation.

13 Reintroduce the reference to national energy and climate plans (NECPs)

Article 18(2)-point f of current Regulation (EU) 2019/943 states that tariff methodologies shall contribute to the achievement of the objectives set out in the integrated national energy and climate plans, reduce the environmental impact and promote public acceptance.

The proposal removes a reference to NECPs, and the legislative package has not provided the rationale for the deletion.

The network charge system is closely linked to the energy transition. Member States have set out measures in their NECPs to ensure the success of this transition. CEER welcomes the European Commission's efforts to thoroughly assess the NECPs so that EU targets are properly defined and implemented. NRAs generally incorporate these objectives into their network charge systems and comply with the NECPs, supporting the integration of clean energy technologies and advancing the energy transition in a holistic manner. Removing the reference to the NECPs may make coordination more difficult and may hinder Europe's decarbonisation objectives.

- CEER calls for the **retention of the requirement that tariff methodologies shall contribute to the achievement of the objectives set out in the integrated national energy and climate plans in Article 18 of the Regulation.**

14 Ensure gradual implementation of the new rules

The pursuit of a future-proof design of network charges, in response to this legislative proposal or to ACER's best-practice report on transmission and distribution tariff methodologies, will, in some instances, require a more gradual implementation of the changes. Phased implementation helps mitigate short-term distributional impacts and allows for adaptation by network users, as recognised in Recital (13) of the proposed Regulation: "Regulatory authorities should (...) consider whether a gradual approach is necessary so as to give system users time to adjust their behaviour and consumption patterns."

- To underline the importance of considering **gradual implementation of measures** when pursuing a more future-proof network charge design, CEER suggests including an explicit clause in Article 18 of the Regulation, based on the formulation already included in Recital (13) of the proposed Regulation.

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Council of European Energy Regulators
Cours Saint-Michel 30a, box F - 1040 Brussels - Belgium
Tel. +32 (0)472 74 02 82 | brussels@ceer.eu

WWW.CEER.EU

