

The Consumer Voice in Europe

2025 WORK PROGRAMME OF THE COUNCIL OF EUROPEAN ENERGY REGULATORS (CEER)

BEUC's input to the public consultation



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Why it matters to consumers

The energy sector is complex and undergoing important changes as the EU strives to become more energy-efficient and switches to renewables in order to meet its climate targets. 2025 and onwards will be the years where the massive overhaul of the bloc's energy legislation that was adopted under the 2019-2024 European Commission will have to be implemented on the ground. As energy markets differ between EU countries, regulators will have to review what works, why, and how to overcome any barriers to implementing the new laws. Cooperation between regulators is vital in this regard, which is why BEUC provides its input to this work programme.

Summary

BEUC welcomes the opportunity to comment on the Council of European Energy Regulators' (CEER) 2025 work programme. In our reply, we emphasise the following points:

- ▶ Overall, CEER's work programme **focuses on consumer-relevant topics**. These for instance include comparability of energy offers, and market innovations such as energy sharing.
- ▶ In our response, we reiterate important principles for **price comparison tools to deliver value for consumers**.
- ▶ BEUC **would welcome a link [to its joint vision with CEER for energy consumers in 2030](#)**. Given the work programme's focus on digital topics, we specifically highlight data protection and cybersecurity.
- ▶ BEUC recommends regulators to **link their work on energy efficiency to the building/residential sector**, specifically to address the high upfront costs for consumers. For instance, regulators should consider so-called 'on-bill schemes', which are micro-loans that can help consumers renovate their home or install renewable energy devices.
- ▶ Regulators should **monitor progress on the national implementation of new EU legislation** such as the Electricity Directive and the Electricity Market Design.
- ▶ BEUC strongly supports **the suggested focus on energy poverty and active energy consumption** in the context of CEER's joint work with the EU Agency for the Cooperation of Energy Regulators, ACER.
- ▶ Grid connections are crucial for the uptake of renewables by households. BEUC urges regulators to **explore challenges with connecting to the grid**.

BEUC's feedback on CEER's proposed priority areas

CEER proposes that the 2025 Work Programme should focus on the six priority areas from the 2022-2025 CEER Strategy (Consumer-centric design; Sustainable and efficient infrastructure; Well-functioning markets; Energy system integration; Flexibility; Decentralised and local energy) and Significant recurring work. Do you support how these areas flow into the draft 2025 Work Programme?

BEUC reply: BEUC welcomes the mix of focus between a) cross-cutting and existing topics (such as comparability and transparency of energy offers, bundled products, termination fees) and b) specific innovations in electricity markets (such as energy sharing and dynamic pricing contracts).

2025 and onwards will be the years where the many pieces of new EU energy sector legislation have to be delivered in the real world. It will be the moment to see what works, what does not, why, and how to overcome barriers to the active participation of consumers in the change to sustainable energy. Such barriers can be related to issues as diverse as national taxation schemes, grid capacity or connections, a lack of smart metering or simply a lack of information and awareness. We expect these barriers to be different across the EU Member States.

In addition to the new legislation, new offers, digital services and innovations in energy markets add another layer to an already complex energy market environment for consumers. CEER and National Regulatory Authorities (NRAs) have to ensure that consumers are guided through this complexity and are able to access to new offers that benefit them while being adequately protected.

BEUC welcomes the focus on consumer information and knowledge. Information should be reliable and trustworthy. In addition, awareness, advice and support are key to help consumers make well-informed decisions.

Given the digital elements of the proposed priorities, it is paramount to ensure that the existing EU legal framework on personal data protection, privacy and cybersecurity – i.e., the GDPR, the ePrivacy directive, the Cyber Resilience Act and the NIS2 Directive – remain fully applicable and are not compromised.

For instance, the development of smart energy technologies and services must always follow the principles of privacy by design and by default, data minimisation, and purpose limitation. This is important to ensure that consumers' personal data is being processed in a lawful and fair manner which does not lead to unfair price discrimination.

These digital policy themes are already mentioned in [the CEER-BEUC joint vision](#) for energy consumers (see answer to the next question) and are particularly crucial in the context of CEER's priorities regarding flexible use of electricity. Cooperation with data protection regulators is therefore also important, in addition to the cooperation with financial, competition and telecommunication regulators that is mentioned in the work programme's section "significant and recurring work".

What CEER and its members could consider in their various projects regarding "consumer-centric design" are additional social or socio-economic variables. The basis for

differences between consumers can be, for example: type of accommodation (apartment, house, shared accommodation); type of housing arrangement (rental, ownership); the energy performance of said housing; household composition (e.g. childcare routines); health and care needs; digital exclusion; neuro-divergence; and literacy needs. An example of how this relates to, for instance, the uptake of flexibility by more households can be found in [this research](#) by BEUC's UK member Citizens Advice.

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.)

BEUC reply: The CEER 2025 Work Programme focuses on deliverables that are highly relevant to consumers. They reflect the diverse challenges of a society that is changing the way it consumes energy. BEUC looks forward to provide input on the various workstreams going forward.

BEUC would welcome a link to the '[CEER-BEUC 2030 vision for energy consumers](#)' which covers the principles of affordability, simplicity, protection, inclusiveness, reliability, and empowerment.

Finally, in our input for the individual work items (for instance, No. 13), we also encourage CEER to make a link between energy efficiency and the building/residential sector specifically regarding the high upfront costs for consumers.

BEUC's response to the proposed individual work items

Please note: BEUC provided input on work items 1, 2, 5, 13, 15. For the sake of brevity, the other work items are not listed in this document.

Work item 1: "Transparency and Comparability in the Retail Market." Concept subtitle: "Working Towards Well-Informed Decisions with real Comparable Offers"

Description: 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. Do you have any specific comment on this individual work item?

BEUC reply: Comparison tools, if well-designed, can help consumers access the information that they need to make the best choice for their needs. They do so by providing all necessary information (e.g. price, sustainability, bundles) in one place and by estimating consumers' bills on the basis of their consumption profile and/or the characteristics of their household.

Reducing the complexity of comparison tools can help consumers become more active in energy markets. It is crucial that comparison tools cover new offers such as dynamic price contracts, hybrid contracts (e.g., a mix of dynamic and fixed-price contract), aggregation contracts, and energy sharing contracts.

To ensure that consumers profit from sharing any personal data (i.e. their consumption profile and/or the characteristics of their household) it is paramount that comparison tools abide by the GDPR and the ePrivacy directive. For consumers to be effectively empowered to manage their personal data according to their wishes, they need to be made aware well in advance and in a clear and understandable manner what categories of personal data they would be sharing, with whom and for what purpose.

In a [2022 paper](#), BEUC outlined the principles for price comparison tools to deliver value for consumers. Comparison tools must:

1. Ensure transparency of their business model;
2. Cover the entire market. If they do not cover the entire market, they should at least cover a significant share of the market and should list which suppliers are covered;
3. Display up-to-date information;
4. Feature verifiable information;
5. Provide accurate information;
6. Ensure that the information provided to consumers is exhaustive. It must go beyond the price and should also cover information such as figures from complaints boards or consumer satisfaction surveys;
7. Be independent from market participants and ensure that ranking criteria are objective and neutral. If comparison tools feature adverts or sponsored offers, consumers should be able to easily distinguish them from the search results;
8. Be reliable;
9. Include clear information, displayed in a user-friendly way;
10. Be accessible to all consumer segments;
11. Be supervised by a National Regulatory Authority or another competent authority;
12. Respect the existing EU personal data protection and privacy legislative framework.

Work item 2: ACER-CEER Energy Retail Markets and Consumer Protection Report

Description: 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 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. Do you have any specific comment on this individual work item?

BEUC reply: BEUC strongly supports the continuation of the annual European Union Agency for the Cooperation of Energy Regulators (ACER)-CEER market monitoring report which provides very valuable insights into the current state of consumer protection, empowerment and retail market developments across Europe.

For the 2025 edition, it would be key to monitor progress on the national implementation of European legislation, in particular whether and how the Electricity Directive (2019/944) and the new rights and in the Electricity Market Design reform are transposed and implemented in the real-world by all Member States.

BEUC supports the inclusion of consumer-relevant topics such as 'energy poverty' and 'active energy consumption' in the programme. We encourage ACER and CEER to take into account the policy recommendations of real-world projects led by BEUC and its members [regarding solutions to energy poverty](#) ('STEP', completed in 2022) and [the eight barriers to consumers becoming prosumers](#) ('CLEAR-X', also completed in 2022).

Work item 5: Grid connection capacity challenges

Description: 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.

BEUC reply: BEUC's CLEAR-X project underlined that grid connections are a crucial variable in the ongoing uptake of renewables by households. Where possible, consumer organisations intend to provide regulators with real-world cases of consumers struggling with grid connections.

Consumers can [play a role in mitigating grid bottlenecks](#) by using their electricity flexibly. This requires that: a) they are remunerated for said flexibility, b) that they receive trustworthy information on the benefits of flexible electricity offers, c) that it is easy for them to engage by delegating control (automation), d) but that they can revert this automated control when needed (e.g. for health or other reasons).

Beyond capacity challenges, it is also important for regulators to explore challenges with connecting to the grid as such. BEUC's members already have acted at the national level regarding grid issues.

For instance, in the context of the CLEAR-X project the Cyprus Consumer Association (Κυπριακού Συνδέσμου Καταναλωτών) [advocated](#) against a lack of administrative

capacity to process grid connections for solar panels. This resulted in the Cypriot authorities dedicating more staff to deal with the level of demand. The CLEAR-X project also looked at complex administrative procedures regarding permit-granting and highlighted the need for one-stop shops.

Work item 13: Public Workshop on NRA independence in a multi-sectoral environment

Description: 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 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. Do you have any specific comment on this individual work item?

BEUC reply: BEUC supports this work item and encourages close examination of the future organisational set up and tasks of NRAs outside their 'core' activities. It is important to analyse the extent to which these new innovations and business cases require new regulation, enforcement of existing legislation, and cooperation between energy and other regulators.

In view of the EU's energy and climate neutrality objectives, BEUC urges energy regulators to also link to policy work regarding the residential sector, specifically building retrofits, energy efficiency, and installation of renewable energy devices. In the description/output column, we therefore suggest to make this link by adapting the existing text as follows: "The development of a comprehensive whole-system approach will require regulation at the margins and interfaces of various sectors, such as EVs and energy efficiency services in the residential sector. Furthermore, innovation and new business models will necessitate that regulation be swiftly developed, for instance regarding unbundled offers of energy efficiency services in the form of on-bill schemes. An overview of tasks that are outside the 'core' regulatory business outlined in the Directives will provide insight into such recent developments."

BEUC specifically underlines the importance of on-bill schemes as they can help consumers better deal with the high upfront costs related to energetic building renovation and the installation of renewable energy devices at home. On-bill schemes are micro-loans where a third-party pays for the energy renovation or renewable device installation in the home, and the consumer then pays back the costs on a monthly basis as part of their energy bill.

Since January 2024, Cypriot consumers have had access to on-bill schemes in order to install solar panels. The Energy Efficiency Directive (Directive 2023/1791) opens the way to third-party financing, meaning that private finance can be leveraged through on-bill

schemes. Energy suppliers' own finances would not be solicited, only their billing infrastructure.

Work item 15: How to implement the Decarbonisation Package in relation to regulation of hydrogen and biomethane?

Description: CEER will analyse the different possibilities for the implementation of the Decarbonization Package, that has been published in 2024. Among the main issues: 1) access conditions, 2) unbundling, 3) derogations.

BEUC reply: Hydrogen will remain an expensive energy carrier and will not be a suitable option for consumers' heating and cooling needs, and should not be promoted in residential heating.

