

Public consultation on a Communication on the Citizens Energy Package for a Just Transition and Consumer Empowerment

Fields marked with * are mandatory.

Introduction

The Citizens Energy Package for a Just Transition and Consumer Empowerment is linked to the delivery of the Affordable Energy Action Plan. It aims to help make it affordable and easy for all citizens to benefit from the internal energy market and to ensure a just transition that leaves no one behind. This means accelerating the concrete achievement of the Just Transition goals and to implement on the ground the EU rules and policies on consumer empowerment and protection. It thus aims to help not only those citizens who are already engaged, but also the energy poor and vulnerable and in particular consumers for whom energy is a significant part of their cost of living, but who currently lack the capacity to act on energy markets or actively participate in it.

The Package has a three-fold goal: first, it includes measures to enhance the Just Transition principle that no citizen is left behind; it addresses measures tackling energy poverty and supports the complex process of decarbonising coal regions. Secondly, it encompasses a set of actions to facilitate consumer activation, i.e. to promote citizens' participation in energy production and exchange both individually (as prosumers) and collectively through energy communities and energy sharing. Third, it addresses issues that affects all citizens in respect of the energy transition, in particular the need to ensure energy affordability. This implies to ensure public acceptance by citizens, to better inform them, address barriers to affordability, building a mutual trust relationships with suppliers and DSOs, and enhancing the role of local players and initiatives where the energy transition takes place. The feed-back from respondents will be important for the Commission's work to support the smooth and coherent transposition of EU rules on energy consumers through guidance to the Member States.

The Package will also help deliver the Clean Industrial Deal, fulfilling its commitments and promoting flexible market participation that benefits all consumers. It will be closely linked to the electrification and digitalisation strategies with a focus on ensuring that these are delivered in a consumer-friendly way.

This open public consultation together with targeted consultations on the guidance documents aim to ensure a wide understanding and ownership of the whole Package by key stakeholders – regulators, consumer organisations, industry, local and regional administrations, civil society and citizens. This consultation is thus

complemented by other consultation fora and processes, such as Citizens Energy Forum and the Regulatory Round Table, outreach events to different types of stakeholders, and working groups on consumers and on energy poverty.

We are very much interested in hearing your views on the Citizens Energy Package as described above.

Thank you in advance for your contribution.

*The following questionnaire consists out of 8 parts. It will start with questions on just transition and energy poverty, after which it will dive into questions on affordability and consumer empowerment and protection. **It is not mandatory to respond to all parts, you are free to respond to those parts that are of interest to you.***

The following topics will be part of the questionnaire

Section 1 on Just Transition and Energy Poverty

1. Questions on just transition, energy poverty and public acceptance
2. On disconnections

Section 2 on Consumer Empowerment

3. On energy communities
4. On active customers and energy sharing
5. On demand flexibility remuneration in retail contracts – dynamic and hybrid contracts

Section 3 on Consumer Protection, Affordability and Public Acceptance

6. On ensuring energy offers are easily understandable and comparable
7. On limiting risk of supplier bankruptcies
8. On consumer protection in natural gas phase-out

About you

* Language of my contribution

- ☐ Bulgarian
- ☐ Croatian
- ☐ Czech
- ☐ Danish
- ☐ Dutch
- ☒ English
- ☐ Estonian
- ☐ Finnish
- ☐ French
- ☐ German

- ☐ Greek
- ☐ Hungarian
- ☐ Irish
- ☐ Italian
- ☐ Latvian
- ☐ Lithuanian
- ☐ Maltese
- ☐ Polish
- ☐ Portuguese
- ☐ Romanian
- ☐ Slovak
- ☐ Slovenian
- ☐ Spanish
- ☐ Swedish

* I am giving my contribution as

- ☐ Academic/research institution
- ☐ Business association
- ☐ Company/business
- ☐ Consumer organisation
- ☐ EU citizen
- ☐ Environmental organisation
- ☐ Non-EU citizen
- ☐ Non-governmental organisation (NGO)
- ☐ Public authority
- ☐ Trade union
- ☒ Other

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* Organisation name

255 character(s) maximum

EU DSO Entity

* Organisation size

- ☐ Micro (1 to 9 employees)
- ☒ Small (10 to 49 employees)
- ☐ Medium (50 to 249 employees)
- ☐ Large (250 or more)

Transparency register number

Check if your organisation is on the transparency register. It's a voluntary database for organisations seeking to influence EU decision-making.

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* Country of origin

Please add your country of origin, or that of your organisation.

This list does not represent the official position of the European institutions with regard to the legal status or policy of the entities mentioned. It is a harmonisation of often divergent lists and practices.

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|--------------------------------------|--|-------------------------------------|--|
| ☐ Afghanistan | ☐ Djibouti | ☐ Libya | ☐ Saint Martin |
| ☐ Åland Islands | ☐ Dominica | ☐ Liechtenstein | ☐ Saint Pierre and Miquelon |
| ☐ Albania | ☐ Dominican Republic | ☐ Lithuania | ☐ Saint Vincent and the Grenadines |
| ☐ Algeria | ☐ Ecuador | ☐ Luxembourg | ☐ Samoa |
| ☐ American Samoa | ☐ Egypt | ☐ Macau | ☐ San Marino |

☐ Andorra	☐ El Salvador	☐ Madagascar	☐ São Tomé and Príncipe
☐ Angola	☐ Equatorial Guinea	☐ Malawi	☐ Saudi Arabia
☐ Anguilla	☐ Eritrea	☐ Malaysia	☐ Senegal
☐ Antarctica	☐ Estonia	☐ Maldives	☐ Serbia
☐ Antigua and Barbuda	☐ Eswatini	☐ Mali	☐ Seychelles
☐ Argentina	☐ Ethiopia	☐ Malta	☐ Sierra Leone
☐ Armenia	☐ Falkland Islands	☐ Marshall Islands	☐ Singapore
☐ Aruba	☐ Faroe Islands	☐ Martinique	☐ Sint Maarten
☐ Australia	☐ Fiji	☐ Mauritania	☐ Slovakia
☐ Austria	☐ Finland	☐ Mauritius	☐ Slovenia
☐ Azerbaijan	☐ France	☐ Mayotte	☐ Solomon Islands
☐ Bahamas	☐ French Guiana	☐ Mexico	☐ Somalia
☐ Bahrain	☐ French Polynesia	☐ Micronesia	☐ South Africa
☐ Bangladesh	☐ French Southern and Antarctic Lands	☐ Moldova	☐ South Georgia and the South Sandwich Islands
☐ Barbados	☐ Gabon	☐ Monaco	☐ South Korea
☐ Belarus	☐ Georgia	☐ Mongolia	☐ South Sudan
☒ Belgium	☐ Germany	☐ Montenegro	☐ Spain
☐ Belize	☐ Ghana	☐ Montserrat	☐ Sri Lanka
☐ Benin	☐ Gibraltar	☐ Morocco	☐ Sudan
☐ Bermuda	☐ Greece	☐ Mozambique	☐ Suriname
☐ Bhutan	☐ Greenland	☐ Myanmar/Burma	☐ Svalbard and Jan Mayen
☐ Bolivia	☐ Grenada	☐ Namibia	☐ Sweden
☐ Bonaire Saint Eustatius and Saba	☐ Guadeloupe	☐ Nauru	☐ Switzerland
☐ Bosnia and Herzegovina	☐ Guam	☐ Nepal	☐ Syria

☐ Botswana	☐ Guatemala	☐ Netherlands	☐ Taiwan
☐ Bouvet Island	☐ Guernsey	☐ New Caledonia	☐ Tajikistan
☐ Brazil	☐ Guinea	☐ New Zealand	☐ Tanzania
☐ British Indian Ocean Territory	☐ Guinea-Bissau	☐ Nicaragua	☐ Thailand
☐ British Virgin Islands	☐ Guyana	☐ Niger	☐ The Gambia
☐ Brunei	☐ Haiti	☐ Nigeria	☐ Timor-Leste
☐ Bulgaria	☐ Heard Island and McDonald Islands	☐ Niue	☐ Togo
☐ Burkina Faso	☐ Honduras	☐ Norfolk Island	☐ Tokelau
☐ Burundi	☐ Hong Kong	☐ Northern Mariana Islands	☐ Tonga
☐ Cambodia	☐ Hungary	☐ North Korea	☐ Trinidad and Tobago
☐ Cameroon	☐ Iceland	☐ North Macedonia	☐ Tunisia
☐ Canada	☐ India	☐ Norway	☐ Türkiye
☐ Cape Verde	☐ Indonesia	☐ Oman	☐ Turkmenistan
☐ Cayman Islands	☐ Iran	☐ Pakistan	☐ Turks and Caicos Islands
☐ Central African Republic	☐ Iraq	☐ Palau	☐ Tuvalu
☐ Chad	☐ Ireland	☐ Palestine	☐ Uganda
☐ Chile	☐ Isle of Man	☐ Panama	☐ Ukraine
☐ China	☐ Israel	☐ Papua New Guinea	☐ United Arab Emirates
☐ Christmas Island	☐ Italy	☐ Paraguay	☐ United Kingdom
☐ Clipperton	☐ Jamaica	☐ Peru	☐ United States
☐ Cocos (Keeling) Islands	☐ Japan	☐ Philippines	☐ United States Minor Outlying Islands
☐ Colombia	☐ Jersey	☐ Pitcairn Islands	☐ Uruguay

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| ☐ Comoros | ☐ Jordan | ☐ Poland | ☐ US Virgin Islands |
| ☐ Congo | ☐ Kazakhstan | ☐ Portugal | ☐ Uzbekistan |
| ☐ Cook Islands | ☐ Kenya | ☐ Puerto Rico | ☐ Vanuatu |
| ☐ Costa Rica | ☐ Kiribati | ☐ Qatar | ☐ Vatican City |
| ☐ Côte d'Ivoire | ☐ Kosovo | ☐ Réunion | ☐ Venezuela |
| ☐ Croatia | ☐ Kuwait | ☐ Romania | ☐ Vietnam |
| ☐ Cuba | ☐ Kyrgyzstan | ☐ Russia | ☐ Wallis and
Futuna |
| ☐ Curaçao | ☐ Laos | ☐ Rwanda | ☐ Western Sahara |
| ☐ Cyprus | ☐ Latvia | ☐ Saint Barthélemy | ☐ Yemen |
| ☐ Czechia | ☐ Lebanon | ☐ Saint Helena
Ascension and
Tristan da Cunha | ☐ Zambia |
| ☐ Democratic
Republic of the
Congo | ☐ Lesotho | ☐ Saint Kitts and
Nevis | ☐ Zimbabwe |
| ☐ Denmark | ☐ Liberia | ☐ Saint Lucia | |

The Commission will publish all contributions to this public consultation. You can choose whether you would prefer to have your details published or to remain anonymous when your contribution is published. **For the purpose of transparency, the type of respondent (for example, 'business association', 'consumer association', 'EU citizen') country of origin, organisation name and size, and its transparency register number, are always published. Your e-mail address will never be published.** Opt in to select the privacy option that best suits you. Privacy options default based on the type of respondent selected

* Contribution publication privacy settings

The Commission will publish the responses to this public consultation. You can choose whether you would like your details to be made public or to remain anonymous.

☐ Anonymous

Only organisation details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and your contribution will be published as received. Your name will not be published. Please do not include any personal data in the contribution itself if you want to remain anonymous.

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Organisation details and respondent details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and your contribution will be published. Your name will also be published.

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Section 1 on Just Transition and Energy Poverty

1. Questions on Just Transition and Energy Poverty

01. What priority actions are needed at EU, national and local level to ensure that just transition and consumer rights become concrete throughout all the EU Member States?

5000 character(s) maximum

02. What are the main challenges to tackling energy poverty in the EU?

(Please rate according to importance)

	Very important	Important	Neutral	Less important	Not important	No opinion
High energy prices	☐	☐	☐	☐	☐	☐
Effective identification of vulnerable and energy poor consumer	☐	☐	☐	☐	☐	☐
Lack of energy efficiency in housing	☐	☐	☐	☐	☐	☐
Limited access to renewable energy	☐	☐	☐	☐	☐	☐
Income inequality	☐	☐	☐	☐	☐	☐

Insufficient awareness and education about energy-saving measures and available assistance programs	☐	☐	☐	☐	☐	☐
Inadequate financial support schemes	☐	☐	☐	☐	☐	☐
Lack of political will	☐	☐	☐	☐	☐	☐
Other	☐	☐	☐	☐	☐	☐

For 'Other', please specify:

2000 character(s) maximum

03. Do you think that, in addition to implementing existing EU legislation, other measures are needed to tackle energy poverty in the EU?

- ☐ Yes, new or additional measures (legal or other) are needed at EU level
- ☐ No, the focus should be on effectively implementing existing EU legislation on energy poverty with existing tools

04. Would setting mandatory target(s) help Member States address energy poverty?

- ☐ Yes
- ☐ No

2. On Disconnections

The energy crisis has exposed already energy poor and vulnerable consumers across the internal market to additional higher energy costs, further eroding their ability to continue paying their energy bills. Legislators have then reinforced the existing legislation on disconnections both for the electricity and gas market, asking Member States to take appropriate measures to prevent disconnections for vulnerable customers and customers affected by energy poverty.

As part of the Package, the Commission will publish guidance on transposition of article 28a of the Electricity Market Directive and Article 28 of the Gas Directive Recast which both legislate on protection from disconnection for vulnerable and energy poor customers.

01. What measure or practice do you consider effective to prevent disconnection from electricity or gas of vulnerable customers and customers affected by energy poverty?

(Please rate according to importance)

	Very important	Important	Neutral	Less important	Not important	No opinion
Promoting voluntary codes of conduct or a charter for suppliers and customers <i>(arrangements may concern support for customers in managing their energy use and costs, including flagging unusual high energy spikes or use in winter and summer seasons, offering appropriate flexible payment plans, debt advice measures, self-metering readings, and improved communication with customers and support agencies)</i>	☐	☐	☐	☐	☐	☐
Promoting customers' education and awareness (e.g. through one-stop-shops or advisory points)	☐	☐	☐	☐	☐	☐
Access to finance, vouchers or subsidies	☐	☐	☐	☐	☐	☐
Encouraging and facilitating the provision of meter readings	☐	☐	☐	☐	☐	☐
Targeted energy tariffs/allowances for vulnerable consumers	☐	☐	☐	☐	☐	☐
Structural measures to address the root causes of energy poverty (e.g., building renovations, energy efficiency measures, access to renewable energy sources, etc.)	☐	☐	☐	☐	☐	☐

Please, use this space if you wish to point out other effective measures/practices to prevent disconnection from electricity or gas of vulnerable customers and customers in energy poverty

2000 character(s) maximum

02. Which actions/measures could be most effective in preventing customers from accumulating debt?

(Please rate according to importance)

	Very important	Important	Neutral	Less important	Not important	No opinion
Transparency and clear communication about energy consumption, costs, and payment obligations	☐	☐	☐	☐	☐	☐
Regular billing and payment reminders	☐	☐	☐	☐	☐	☐
Flexible payment plans taking into account the customer's income and expenditure	☐	☐	☐	☐	☐	☐
Debt counselling or energy efficiency advice to help consumers manage their energy costs and consumption	☐	☐	☐	☐	☐	☐
Targeted financial support or coverage/ subsidies/ energy cheques provided by local /regional/national authorities	☐	☐	☐	☐	☐	☐

Please, use this space if you wish to point out other effective measures/practices to prevent customers from accumulating debt

2000 character(s) maximum

03. Please, share any relevant best practice on protection of vulnerable customers and customers affected by energy poverty from electricity and gas disconnections and from debt accumulation.

5000 character(s) maximum

Section 2 on Consumer Empowerment

3. On Energy Communities

Energy communities are legal entities that empower citizens, small businesses and local authorities to produce, consume and sell their own energy. These can cover various parts of the energy value chain, including production, distribution, supply, consumption and aggregation. These vary depending on their location, actors and energy services. Energy communities enable citizens to access low-cost renewable energy by owning production installation, and access information on increasing energy efficiency in households – helping consumers gain control of their bills. Energy communities benefit from an EU framework in the Electricity Market Directive (EU) 2019/944 and Renewable Energy Directive (EU) 2018 /2001).

01. How can the Commission support the realisation of the objectives of energy communities?

(Please rate according to importance)

	Very important	Important	Neutral	Less important	Not important	No opinion
Awareness raising	☐	☐	☐	☐	☐	☐
Legislation	☐	☐	☐	☐	☐	☐
Capacity building support	☐	☐	☐	☐	☐	☐
Funding	☐	☐	☐	☐	☐	☐
Other	☐	☐	☐	☐	☐	☐

For 'Other', please specify:

2000 character(s) maximum

02. Would you find it useful if the Commission provides guidance to the EU Member States on the following:

Maximum 6 selection(s)

- ☐ Permitting and licensing
- ☐ Access to financing and information
- ☐ Access to markets
- ☐ Public procurement
- ☐ Other
- ☐ None of the above

03. Are there any good practices that you think would be useful to highlight in such a guidance?

5000 character(s) maximum

04. Would you find it useful if the Commission includes a political objective in the Communication in relation to:

(Select topics you agree with)

Maximum 5 selection(s)

- ☐ Number of energy communities per municipality
- ☐ Total installed renewable energy capacity by energy communities
- ☐ Number of citizens engaged in energy communities
- ☐ Other
- ☒ None of the above

4. On Active Customers and Energy Sharing

With the introduction of a right to energy sharing in the Electricity Market Directive (EU) 2024/1711, households, businesses and public bodies can share self-produced renewable energy directly between each other without the need for a supply license. This practice empowers consumers to collectively operate or use renewable energy systems and access the generated electricity at affordable rates.

01. In relation to energy sharing, would you find it useful if the Commission provides guidance on:

(Please rate according to importance)

	Very important	Important	Neutral	Less important	Not important	No opinion
Data management	☐	☒	☐	☐	☐	☐
Consumer protection	☐	☐	☐	☐	☐	☒
Single point of contact	☐	☒	☐	☐	☐	☐
Energy sharing organiser	☐	☐	☐	☒	☐	☐
Involvement of energy poor and vulnerable households	☐	☐	☐	☐	☐	☒
Other	☐	☒	☐	☐	☐	☐

For 'Other', please specify:

2000 character(s) maximum

Given the lack of space in the consultation to make general comments on energy sharing, we would like to highlight here the following general statement: 1) Complexity should be carefully managed: If any of the guidelines is developed, we would like to highlight the importance of managing complexity arising from multiple services operating on the same delivery point. This complexity poses challenges in defining clear data ownership, ensuring consistent data exchange, and preventing overlaps or conflicts in metering and billing processes. 2) Consideration of the need for cost-reflective network tariffs (also in energy sharing): When considering a special tariff regime for consumers engaging in energy sharing, we support the principle stated by the European Commission on its guidelines on electricity tariffs: "These special tariff regimes are not excluded under the relevant rules but need to be justified by the relevant NRA in light of the broader principle of cost-reflectivity." Therefore, any discount or special tariff for energy sharing must be based on actual demonstrable savings and efficiency gains. . Cost-reflective are important to ensure cost recovery by DSOs. Lacking these principles, DSOs could fail to invest enough in smarter grids and the IT-infrastructure necessary for the provision of these services. In a particular note, if the EC decides to provide guidance on the energy sharing organizer more clarity regarding its role could be helpful. The role of an energy sharing organiser can, optionally, take on tasks on behalf of active customers and even be the owner of generation assets. However, this dual role creates ambiguity in terms of responsibilities and process flows. This results in a proliferation of optional process steps and data exchange pathways, complicating interoperability and implementation.

02. Are there any good practices that you think would be useful to highlight in such a guidance?

5000 character(s) maximum

Given the lack of space in the consultation to provide additional comments to question (3) on a potential implementing act on data interoperability for energy sharing, we use this space to provide a reasoning for our response to question (3). Explanation for DSO Entity's response on the Implementing Act: • Given the mandate of DSO Entity to promote the completion and functioning of the internal market for electricity (EU/2019/943 Art. 52(1)) and its role in developing implementing acts to ensure data interoperability (EU/2023/1162 Art. 11 and 12), DSO Entity acknowledges the interest in creating transparency about different national implementations of energy sharing. • While in several Member States energy sharing has already been implemented and works efficiently with thousands of energy sharing schemes in place facilitated by DSOs, some Member States are lagging behind. An implementing act on data interoperability on energy sharing is an option to provide more transparency on different national models that can give valuable insights for countries who might not yet have implemented energy sharing provisions. • Nevertheless, such an implementing act shall not negatively affect existing national practices but rather provide transparency about different schemes and map existing national practices along a role model. • Thus, the objective of such an implementing act will be to enhance European-wide transparency about national implementation while at the same time respecting national models /differences.

03. Do you consider there is a need for an implementing act on data interoperability for energy sharing?

- ☒ Yes
☐ No

5. On Demand Flexibility Remuneration in Retail Contracts - dynamic and hybrid contracts

Demand flexibility should be actively promoted in the retail market with offers that provide lower prices for industries, and consumers who choose to participate. As part of its commitment to energy affordability and flexible market participation, the Affordable Energy Action Plan mandates the Commission to develop guidance for promoting the remuneration of flexibility in retail contracts. This aims to boost consumer engagement by incentivising adjustments in energy usage that align with supply and demand dynamics. To ensure broad participation, it is important that these incentives are clear, understandable, and financially attractive for consumers to opt in. Furthermore, increasing consumer participation involves providing them with a range of choices and equipping them with the necessary tools and information to make educated decisions about their energy behaviour, thereby safeguarding their interests as they navigate an increasingly complex energy market.

01. What do you consider as benefits and challenges regarding the integration of demand flexibility into the retail energy market through flexible supply contracts (e.g., hybrid, dynamic pricing, time-of-use contracts)?

(Please rate according to importance)

Benefits - Challenges	Very important	Important	Neutral	Less important	Not important	No opinion
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<u>Benefit:</u> Lower electricity costs for consumers	☐	☒	☐	☐	☐	☐
<u>Benefit:</u> More efficient management of the system and lower prices overall	☐	☒	☐	☐	☐	☐
<u>Benefit:</u> Better integration of renewable energy sources	☐	☐	☐	☐	☐	☒
<u>Benefit:</u> Improved grid stability	☐	☐	☒	☐	☐	☐
<u>Benefit:</u> Increased consumer engagement and awareness, leading to better energy management	☐	☐	☐	☐	☐	☒
<u>Benefit:</u> Other	☒	☐	☐	☐	☐	☐
<u>Challenge:</u> Lack of smart metering infrastructure	☐	☒	☐	☐	☐	☐
<u>Challenge:</u> Insufficient regulatory framework	☐	☐	☐	☒	☐	☐
<u>Challenge:</u> Lack of standards or guidelines for dynamic or hybrid energy supply contracts	☐	☐	☐	☐	☐	☒
<u>Challenge:</u> Absence of dynamic or hybrid energy supply contracts	☐	☐	☐	☐	☐	☒
<u>Challenge:</u> Inconsistent regulatory approaches and national practices across the EU	☐	☐	☒	☐	☐	☐
<u>Challenge:</u> Other	☒	☐	☐	☐	☐	☐

Benefit: For 'Other', please specify:

2000 character(s) maximum

A potential benefit of introducing demand flexibility into retail tariffs is the effect this could have on investment decisions of both electricity users and grid providers. For example, by introducing this link, consumers could decide to invest in assets that facilitate they can provide flexibility when required because they are perceived to have an overall lower total costs (i.e. cost of the asset plus electricity costs) than alternative assets. When considering these benefits, however, it is important to have a word of caution. The integration of demand flexibility into the retail energy market through flexible supply contracts (i.e., Time-of-Use or dynamic pricing by suppliers), if done independently and without coordination with DSOs on grid constraints, does not necessarily result in distribution grid stability benefits, as their price signals may not match the grid's actual needs. Setting retail tariffs based on market prices does not guarantee alignment with local grid needs. Each local area has its own specific generation and consumption patterns, and therefore its own peak times. It might only bring a benefit for the improvement of grid stability at the distribution level if the demand flexibility enabled by these contracts is coordinated with distribution grid needs and locally optimized. Our answers above, have been developed considering that this integration between DSO needs and retail tariffs is created and, as result, retail and grid tariffs are aligned.

Challenge: For 'Other', please specify:

2000 character(s) maximum

A significant challenge is the risk that the incentives provided by retail tariffs are not aligned with the needs of the grid (as reflected in, for example, grid tariffs). Once that grid tariffs are recovered via retail tariffs, there is nothing precluding retailers modifying the incentives in grid tariffs (e.g. a retail contract could include a fixed price which would leave the risk of variations in the grid tariffs with the retailers and not with the consumer). A challenge when considering the relationship between demand flexibility and retail tariffs is whether alternative mechanisms exist to obtain this flexibility and the potential interaction between these mechanisms. For example, very active/very profitable local flexibility markets would make the link of this link less successful as consumers could react via the local markets instead of their retail tariffs.

02. What measures or actions are most important for promoting demand flexibility in retail markets?

(Please rate according to importance)

	Very important	Important	Neutral	Less important	Not important	No opinion
Offering financial incentives or rewards for consumers participating in demand flexibility programmes	☐	☐	☐	☐	☐	☒
Developing user-friendly digital tools and platforms for real-time energy management	☐	☒	☐	☐	☐	☐
Enhancing the access to smart meter data and automation to support flexible consumption	☒	☐	☐	☐	☐	☐

Ensuring that the regulatory frameworks support fair remuneration of flexibility and consumer protection	☐	☐	☒	☐	☐	☐
Providing regular, transparent communication about the benefits and risks of flexible supply contracts, alongside educational campaigns to improve consumer awareness and understanding of such contracts	☐	☐	☐	☐	☐	☒
Facilitating collaboration between different stakeholders to ensure an efficient and competitive flexibility market	☐	☐	☐	☐	☐	☒
Other	☐	☐	☐	☐	☐	☒

For 'Other', please specify:

2000 character(s) maximum

03. What measures or commercial practices could be in place to protect consumers from excessive risks associated with price volatility in flexible supply contracts?

(Please rate according to importance)

	Very important	Important	Neutral	Less important	Not important	No opinion
Introducing price limits to contain costs during excessive price peak periods	☐	☐	☐	☐	☐	☒
Offering hybrid contracts that blend fixed and dynamic pricing for balance and predictability	☐	☐	☐	☐	☐	☒

Ensuring availability of 'safety net' features such as guarantees or insurance against price spikes	☐	☐	☐	☐	☐	☒
Promoting access to real-time consumption data through smart meters to enable informed usage decisions	☐	☐	☐	☐	☐	☒
Implementing clear, simple, and accessible contract terms and conditions	☐	☐	☐	☐	☐	☒
Providing comprehensive information of the opportunities, costs and potential risks, and applying techniques to identify final customer's preferences (e.g. risk profile assessment)	☐	☐	☐	☐	☐	☒
Offering comparison tools that help consumers evaluate different contract options	☐	☐	☐	☐	☐	☒
Encouraging the development of risk-sharing mechanisms between consumers and suppliers	☐	☐	☐	☐	☐	☒
Other	☐	☐	☐	☐	☐	☒

For 'Other', please specify:

2000 character(s) maximum

Section 3 on Consumer Protection, Affordability and Public Acceptance

General questions

01. What actions are needed at EU, national and local level and by whom to raise awareness about consumer protection, rights and opportunities for consumers to engage in the energy transition? Are you aware of any good practices?

5000 character(s) maximum

02. Are there any specific areas (e.g. clarity of energy bills, unfair commercial practices, peer-to-peer trading) where you believe the EU could further focus to increase consumer protection and engagement in the energy market? If so, which areas should be prioritised?

5000 character(s) maximum

03. Do you think that additional measures are needed to enhance public acceptance of renewables in the EU?

- ☐ Yes, new or additional measures are needed.
- ☐ No, existing rules and recommendations are sufficient and it is more important to focus on their implementation.

04. What type of interventions would be more effective in involving citizens and enhancing public acceptance of renewables in your view?

(Please rate according to importance)

	Very important	Important	Neutral	Less important	Not important	No opinion
Indirect financial participation (benefit sharing) e.g. job creation	☐	☐	☐	☐	☐	☐
Direct financial participation e.g. buying stakes in the project, financing for local communities (municipalities, citizens)	☐	☐	☐	☐	☐	☐
Promoting communities' participation in renewable energy projects e.g. through the inclusion of measures to foster public acceptance in renewables auctions criteria	☐	☐	☐	☐	☐	☐
Communication measures e.g. education and information campaigns	☐	☐	☐	☐	☐	☐
Early engagement of citizens and involvement in the decision-making process	☐	☐	☐	☐	☐	☐
Other	☐	☐	☐	☐	☐	☐

For 'Other', please specify:

2000 character(s) maximum

05. What do you believe are the main retail challenges for affordable energy in your Member State?

Maximum 3 selection(s)

- ☐ High retail prices
- ☐ Limited access to renewable energy options
- ☐ Lack of (competitive) offers
- ☐ Lack of access to smart solutions (e.g. smart meters, smart appliances and/or aggregators)
- ☐ Lack of information or awareness about energy-saving options
- ☐ Other

For 'Other', please specify:

2000 character(s) maximum

6. Ensuring energy offers are easily understandable and comparable

Due to the increasing complexity of energy offers, consumers often find it difficult to fully understand the implications of suppliers' offers. Therefore, they should be provided with a summary of the key contractual terms and conditions in a prominent manner and in clear and concise language. The European Commission was tasked to provide guidance to Member States on a summary of the key contractual terms and conditions in both electricity and gas markets.

01. What are the key principles that should guide the presentation of energy offers to ensure consumers receive all necessary information in a user-friendly format and in a timely manner?

(Please rate according to importance)

	Very important	Important	Neutral	Less important	Not important	No opinion
Clear and simple language	☐	☐	☐	☐	☐	☐
Visually appealing design and layout	☐	☐	☐	☐	☐	☐
Timely presentation of information	☐	☐	☐	☐	☐	☐
Easy comparison of different energy offers	☐	☐	☐	☐	☐	☐
Personalization of information to individual consumer needs	☐	☐	☐	☐	☐	☐
Accessibility of information across different communication channels	☐	☐	☐	☐	☐	☐
Use of concise and straightforward terminology	☐	☐	☐	☐	☐	☐
Other	☐	☐	☐	☐	☐	☐

For 'Other', please specify:

2000 character(s) maximum

02. Which is the most important information on an energy offer that should be prominently displayed to consumers?

	Most important information on an energy offer?
1	
2	
3	
4	
5	

03. Have you identified good practices regarding a summary of key contractual terms and conditions and/or other tools providing consumers with information on energy offers in a user-friendly format allowing easy comparison? Please elaborate.

5000 character(s) maximum

7. On Limiting Risk of Supplier Bankruptcies

'Supplier Hedging' relates to the purchasing strategy of suppliers on the wholesale market. When suppliers do not ensure that their electricity portfolio is sufficiently hedged, changes in wholesale electricity prices can leave them financially at risk and can result in their failure and them passing on costs to consumers and other network users. Hence, suppliers should be appropriately hedged when offering fixed-term, fixed-price electricity supply contracts. In short, suppliers need to buy the electricity provided to you sufficiently in advance to protect against price hikes.

Article 18a of Directive 2024/1711 aims to ensure that National Regulatory Authorities enforce that suppliers have in place and implement appropriate hedging strategies.

01. Which elements of article 18a EMD are important to clarify further?

(Please rate according to importance)

	Very important	Important	Neutral	Less important	Not important	No opinion
Definitions	☐	☐	☐	☐	☐	☐
Legal implementation Member States	☐	☐	☐	☐	☐	☐
Implementation/enforcement National Regulatory Authorities	☐	☐	☐	☐	☐	☐
Further considerations on types of risks for suppliers	☐	☐	☐	☐	☐	☐
Best practices by NRAs	☐	☐	☐	☐	☐	☐
Other	☐	☐	☐	☐	☐	☐

Any other elements or comments you think are important to highlight? Please elaborate.

2000 character(s) maximum

8. On Consumer Protection in Natural Gas Phase-out

Phasing out the use of natural gas in the household sector may be part of national, regional or local energy transition plans. If this is the case the consumers and especially energy poor and vulnerable consumers, need to be protected and supported to ensure that they do not suffer negative consequences. In accordance with the requirements of article 27 of the recast EU Directive on gas and hydrogen markets (2024/1788), the Commission is preparing guidance on principles and good practices that would apply after a decision has been made, in order to make the process of a natural gas phase-out consumer-focused, just and inclusive.

01. What are the main concerns for households when phasing-out natural gas?

(Please rate according to importance)

	Very important	Important	Neutral	Less important	Not important	No opinion
Lack of alternatives to natural gas for heating and cooking	☐	☐	☐	☐	☐	☐
Higher energy bills	☐	☐	☐	☐	☐	☐
Lack of financial resources to invest in alternative heating sources	☐	☐	☐	☐	☐	☐
Complexity of access to funding or financing	☐	☐	☐	☐	☐	☐
Inconvenience of works for renovation and/or installation	☐	☐	☐	☐	☐	☐
Uncertainty/absence of national/regional/local plans and timelines for phasing out natural gas	☐	☐	☐	☐	☐	☐
Lack of information on plans and concrete actions to take	☐	☐	☐	☐	☐	☐
No availability of companies or workers for the installation	☐	☐	☐	☐	☐	☐
Difficult to take action for a rented home	☐	☐	☐	☐	☐	☐
Difficult to take action in a multi-apartment building	☐	☐	☐	☐	☐	☐
Other	☐	☐	☐	☐	☐	☐

For 'Other', please specify:

2000 character(s) maximum

Please use this space if you wish to elaborate on the main concerns you have identified (explanations, suggestions, etc.)

2000 character(s) maximum

02. What types of support will be essential for citizens, notably vulnerable customers and customers affected by energy poverty, to assist them in the phase-out of natural gas in their homes?

	Very important	Important	Neutral	Less important	Not important	No opinion
Clear and comprehensive information (what to do)	☐	☐	☐	☐	☐	☐
Practical advice (how to do it)	☐	☐	☐	☐	☐	☐
Financial advice (how to pay for it)	☐	☐	☐	☐	☐	☐
Financial support (grants, subsidies, loans, etc)	☐	☐	☐	☐	☐	☐
Fully developed packages of solutions (someone does it for you)	☐	☐	☐	☐	☐	☐
Support to bundle individual projects for joint purchasing or contracting (do it together to get a better deal)	☐	☐	☐	☐	☐	☐
Other	☐	☐	☐	☐	☐	☐

For 'Other', please specify:

2000 character(s) maximum

03. Do you know of best practice examples where natural gas has already been phased out with a focus on consumers such as by involving consumer collectives, consumer organisations, national or local administrations, energy regulatory authorities, or other local actors? If yes, please describe briefly.

3000 character(s) maximum

Contact

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