CEER 2023 Draft Work Programme

A Eurelectric response paper

August 2022

Eurelectric represents the interests of the electricity industry in Europe. Our work covers all major issues affecting our sector. Our members represent the electricity industry in over 30 European countries.

We cover the entire industry from electricity generation and markets to distribution networks and customer issues. We also have affiliates active on several other continents and business associates from a wide variety of sectors with a direct interest in the electricity industry.

We stand for

The vision of the European power sector is to enable and sustain:
- A vibrant competitive European economy, reliably powered by clean, carbon-neutral energy
- A smart, energy efficient and truly sustainable society for all citizens of Europe

We are committed to lead a cost-effective energy transition by:

investing in clean power generation and transition-enabling solutions, to reduce emissions and actively pursue efforts to become carbon-neutral well before mid-century, taking into account different starting points and commercial availability of key transition technologies;

transforming the energy system to make it more responsive, resilient and efficient. This includes increased use of renewable energy, digitalisation, demand side response and reinforcement of grids so they can function as platforms and enablers for customers, cities and communities;

accelerating the energy transition in other economic sectors by offering competitive electricity as a transformation tool for transport, heating and industry;

embedding sustainability in all parts of our value chain and take measures to support the transformation of existing assets towards a zero carbon society;

innovating to discover the cutting-edge business models and develop the breakthrough technologies that are indispensable to allow our industry to lead this transition.

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Customers & Retail Services Committee
Distribution & Market Facilitation Committee
Markets & Investments Committee
WG Customers & New Services
WG Retail Market Design
WG Innovation & Digital
WG Regulation & Network Customers
WG RES & Storage

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Eurelectric public consultation response[1] to CEER's 2023 Draft Work Programme

1. CEER proposes that the 2023 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.

Whilst the areas themselves were consulted upon in the draft strategy public consultation, **do you support how these areas flow into the draft 2023 Work Programme?**

Eurelectric welcomes the six priority areas and how they flow into the draft 2023 WP. The framework is timely and will allow CEER to properly address the both the short- and long-term challenges currently facing the energy sector.

However, it seems that references to DSOs are lacking except for the flexibility priority areas while other identified topics also deal with DSO activities including decentralized and local energy, energy sector integration, and sustainable and efficient infrastructures. Additionally, some priority areas' topics are not entirely reflected throughout the work programme, specifically with flexibility, sustainable and efficient infrastructure, and decentralized and local energy. It would be very valuable for stakeholders to have some individual items covering these key topics which are challenging to the energy sector.

Consumer-centric design

Before commenting on this priority area, we would like to point out that this concept of consumer-centric design is already in the literature with a proposal from Belgian TSO Elia (more information on this here: https://www.eliagroup.eu/en/ccmd). To avoid confusion with this proposal, we would recommend changing this title to "Consumer Empowerment" or "Consumer Engagement."

Enabling consumers to participate more fully in the energy transition is a key part of the work of Eurelectric (most recently with our Power2People survey identifying key barriers to the uptake of electric solutions and policy recommendations on how to overcome these barriers, more information available here: https://www.eurelectric.org/power2people), so we welcome CEER's plan to focus their work around ensuring green transition policies help consumers reduce their carbon footprint and improve energy efficiency whilst also enabling the uptake of new technologies. A more consumer empowerment-centred approach will rely largely on digital platforms and services which shape the entire customer experience. We feel this framework will set the path for achieving CEER's stated goal of contributing to decarbonization at the lowest cost and help the system cope with more electrification and the addition of more renewable sources of electricity.

We recommend when investigating energy crisis measures, exacerbated by the current war in Ukraine, that lessons learned should be considered in how to evolve the retail market to protect households and industrial customers, where needed. This could be achieved by

[1] Please note that Eurelectric is only providing responses to questions directly affecting the electricity sector and that we did not provide input on all questions. Eurelectric response are provided in blue.

incorporating a cost benefit analysis and / or an analysis of the impact of these measures on decarbonisation, namely through electrification.

In particular, a clear distinction should be made between short-term wholesale market prices (which are required a.o. to ensure an efficient dispatch of capacities across Europe) and consumers' prices (which could/should be reflecting some sourcing and hedging strategies in order to get prices adapted to the consumers' risk profile and capacity / willingness to react to price signals).

The Clean Energy Package was devised to facilitate the integration of renewable generation into the existing electricity markets and to further protect the consumers. Although an important element is to identify the gaps in the EC provisions (e.g. for enabling market players to deliver the investments needed via sound market signals, for implementing provisions already agreed upon, etc.), one should also pay a clear attention to the gaps between the existing provisions at EU level and their implementations at Member States level (e.g. shortcomings in local decisions, namely regarding demand side response).

Energy System Integration

Eurelectric supports the focus of this workstream on the development of new technologies and the further integration of existing resources (like DER, such as storage or heat pumps) into a more optimized energy system.
In particular, it is key that CEER pursues its work carried out in 2022 on the EC hydrogen and decarbonization gas market package, considering the expected next steps on the fine-tuning and finalization of the legislative provisions of that package. Stakeholders' involvement will be required until process completion to ensure the regulatory framework will fit for purpose for both energy system integration and scaling-up of the future EU hydrogen market.

We would like to highlight that digital solutions are extremely relevant for the development of the electricity system as a whole and to boost consumer empowerment by granting them access to information and tools to manage their demand patterns according to internal and external inputs. The digitalisation of the energy sector is increasing, which will bring great changes that offer several opportunities for consumers. However, these changes will also present challenges which have been faced in other sectors, including privacy issues, data protection and access, and cybersecurity. In order to efficiently manage these challenges, it is imperative that the regulatory dimension be reinforced.

Distribution system operators are key enablers of this integration, as the distribution network is the place of connecting and integrating into the system new RES capacity on an unprecedented scale – integrating electrical heating, EV charging, solar PV panels and wind turbines; equipping network users with smart meters and systems and access to data (including relevant market third-parties), and designing smart grids; thus enabling the development of new services and products, which will mostly be data driven and with more up-to-date information. The main tool for energy system integration at local and regional level is smart grids.

When considering hydrogen, we believe the primary focus should be on its end uses (hard to electrify industrial uses, maritime transport, and in aviation), considering the current status and foreseeable developments of hydrogen production and demand patterns. We consider it should be carefully compared against other decarbonisation options (like direct electrification) and chosen only when it represents the most economically efficient

and sustainable alternative, from a system point of view. If large quantities of hydrogen would need to be distributed via transport infrastructures in order to accommodate it, priority should be given to repurpose and reuse the existing gas infrastructure, where technically feasible and cost effective. Development of hydrogen networks, to be framed via the upcoming EU decarbonization package, should be developed only when such a network starts to unfold and has reached a certain scale, in terms of feed-in points, customers, and volumes.

We would also like to highlight that we consider e-Mobility (charging) as a key component, and we think it should be mapped within the core areas. Electric Vehicles are both mobile loads and mobile energy storage units: they can provide flexibility locally and to the electricity system in both capacities. Even though their primary function is to serve mobility needs, an integrated perspective on the interaction between transport and energy sectors is required to drive the decarbonisation of the former, to optimise energy system efficiency, to leverage their contributions to the decarbonisation of the power system, and to empower consumers.

Sustainable and Efficient Infrastructure

Eurelectric agrees with the assertions made by CEER that an effective regulatory framework at EU-level is needed to ensure a level playing field for new solutions and removing barriers to entry. More specifically we recommend:

- Any proposed sustainability initiatives **should be done with a life-cycle approach** including the entire value chain and promote circularity in the infrastructure's design.

- Proposed sustainability initiatives **should not threaten the lifetime of assets in use or lead to supply-chain issues**. This risk delaying renewable energy connections and jeopardizing the realization of the Green Deal's objectives.

- Measures promoting sustainability **should not increase the pressure on raw materials** needed to manufacture network assets, such as steel and copper. To make the most efficient use of these resources, a holistic approach should be followed which coordinates the ambition of environmental, energy, and standards legislation.

- Investments which are **most effective in achieving sustainability objectives** should be given the highest priority and adequate incentive schemes. Moreover, in light of efficiency objectives, we recommend recognizing the strategic value from innovation and the digitalization of grids.

- A focus on the impact of digitalisation on the energy sector and its application in the unlocking of flexibility resources including demand response.

Well-Functioning Markets

We welcome CEER's recognition of the wholesale price of natural gas as the main driver for the recent price shocks in the wholesale electricity markets. As analysis continues on possible improvements to the electricity market design, we highly encourage CEER to consider the short-, medium-, and long-term implications of any recommended measures. The current electricity market was designed over the past 20 years and accordingly accommodated the newest developments. It is of utmost importance to recognize that we

are in an extraordinary situation, and this singularity of this time should be considered when discussing potential interventions in the electricity market. These interventions should always be limited in time (rather than rushing into structural changes, which risk introducing harmful distortions and inefficiencies), be as non-distortive as possible, and abide by a strict set of principles. The past months have shown that scarcity pricing in the electricity markets is politically untenable, and governments tend to intervene when prices spike. Unfortunately, these measures undermine investor confidence and risk slowing the investments needed to decarbonise the energy system.

We should not abandon its benefits due to the current extraordinary situation, exacerbated by the ongoing war in Ukraine. Any short-term measures considered for implementation should be accompanied by a clear timeline for their phase-out (with clearly identified economic indicators for each phase) as the situation returns to normal. As prices are reflecting the supply-demand balances and beyond the impact of commodity prices, the availability of generation capacity and the level of demand are also key drivers for wholesale electricity prices. In the current context, this also explains the importance of promoting energy savings and energy efficiency and of improving the availability of the generation fleet.

As mentioned above, a clear distinction should be made between short-term wholesale market prices and consumers' prices in the analysis. In addition, Eurelectric also believes that well-functioning markets should provide adequate incentives and tools to deliver the investments needed.

We also welcome CEER's recognition for the need to better define the roles of new market participants who will contribute to the further competitive integration and decentralization of the energy system. We understand the framework guidelines on demand-side flexibility will be one opportunity to do so, however, ongoing implementation of the Clean Energy package in Member States should be taken into account to avoid sunk costs and associated cost burdens on final consumers.

Flexibility

Together with CEER, Eurelectric recognizes the need for organizing electricity markets to be more flexible and fully integrate all market players in decentralized markets, and by providing a proper regulatory framework to incentivise all involved actors. In our flexibility report (available here: https://www.eurelectric.org/events/flexibility-the-enabler-for-a-clean-energy-future-10-nov-2021/) and our response to the EU Action Plan on the digitalisation of the energy sector (available here: https://cdn.eurelectric.org/media/5685/eurelectric_digitalisation_energy_sector-2022-030-0036-01-e-h-6227BD35.pdf), we have laid out what investment and regulatory framework will be needed to achieve the points of interest flagged by CEER in this section of their proposed work program.

More specifically, these include:

- **Transparency** for market parties on the overall process and the outcome of DSO decision making, but also concerning the definition of DSO needs and the tendering process
- **Data visibility,** especially transparent information of network needs under clear rules, to promote market participation and avoid unwanted market behaviour. Data must be visible, free, easily accessible, and machine readable.
- **Coordination** of needs among neighbouring System Operators and between market processes.

- **Value Stacking,** any Flexibility Service Provider should be able to use their asset(s) to provide services to multiple markets and access multiple revenue streams while respecting the need to comply with Regulation (EU) 1227/2011 on wholesale energy market integrity and transparency.
- **Incentives or adequate remuneration schemes**, set by the National Regulatory Authorities, are needed for the efficient provision of flexibility services while traditionally, remuneration schemes induced DSOs to invest only in grid reinforcement. They should be improved to incentivise the use of the most cost-efficient solution by DSOs, including the procurement of flexibility.
- **A technology neutral approach** to product definition and the design of the market platforms. This requires and agnostic framework, including for aggregated sources.

Eurelectric would also like to highlight that the development of such regulatory framework does not pass only by the transposition of the Directive 944/2019 of the Clean Energy for All Europeans Package (CEP) to national legislation, but also from the effective development of those disposition by the national regulators, other competent authorities, and other entities such as system operators. In this sense, the availability of (close to) real-time information on metered data and prices to all interested market parties plays a significant role. Eurelectric would welcome a stronger monitoring by CEER on the enablement of such regulatory framework.

DSOs are key for the development and use of flexibility, they should support market parties who want to actively participate in the energy market through services like aggregation, demand management, and peer-to-peer trading.

At the same time, changes to the energy market pose several technical and organizational challenges for DSOs, like how to supply EV charging stations, optimizing the use of energy storage facilities, and empowering active customers with self-consumption control. All of this leads to the development of flexibility services. Where the primary grid flexibility is insufficient to achieve the necessary results (i.e., to increase the security of supply and improve the quality of distribution service in the most efficient ways), DSOs may procure such flexibility as a service, under market-based procedures.

Decentralised & Local Energy

A key pillar of Eurelectric's work is ensuring suppliers can support consumers in participating more fully in the energy transition, which includes facilitating the development of prosumers and energy communities across Europe. We welcome CEER's work to develop the tools and framework necessary to help consumers take on such roles.

We consider that in order to empower customers and active market participation, market-based solutions for flexibility procurement should be the default. DSOs will play the key role of facilitators for market efficient and transparent flexibility procurement. This will enable the creation of a supportive environment to design a market-based procurement approach in dialogue with prosumers and all other relevant stakeholders.

2. Within each priority area, do you think the Work Programme focuses on the right deliverables or should some be deleted or added?

[Please note that not every aspect in each of the six core areas would be addressed in a single year's work programme.]

While Eurelectric welcomes what appears to be an ambitious work program for 2023, in the current situation, it is understandable that a large part of the 2023 WP is dedicated to market design and customer protection, given the increase of energy prices and the upcoming winter supply challenges.

We would like to stress that energy efficiency and energy savings are clearly no regret measure to tackle on a structural basis the concerns of high energy bills to consumers and to pave the way to the net zero ambitions by 2050.

We also regret the lack of focus on how the currently negotiated Energy Taxation Directive could be formulated to both provide consumers with immediate relief from high energy prices and effectively incentivize the decarbonization of the energy system. In order to achieve affordability, all taxes, charges, and levies not linked with the supply of respective energy carrier (e.g. electricity) should not be included in the energy bill.

Some deliverables which could be added to address the sustainable and efficient infrastructure topic is an updated benchmark of the SAIDI (System Average Interruption Duration Index) evolution between DSOs to be published on an annual basis, and a common taxonomy and EU standard key performance indicator for Quality of Energy and Service.

We would also like to see a deliverable showing how investments in networks and infrastructure will impact the achievement the energy transition goals, especially in terms of innovation, digitalisation, and network resilience.

In total, there are 17 work items proposed in the draft CEER 2023 Work Programme divided into several areas:

Customers and retail markets, Distribution systems, Electricity, Gas, International Relations, Legal Affairs, Market Integrity, Regulatory Benchmarking and Recurring / Cross-sectoral.

Do you have any specific comments on the individual work items? Please note that you do not have to provide comments on all proposed items.

Work item 1:
ACER-CEER Energy Retail Markets and Consumer Protection Report

Description:
This 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 source for the report consists of the CEER national indicators and respective surveys. Beyond presenting the key results of our assessment of the functioning of the Internal Energy Market (IEM) in 2022, 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?

Eurelectric considers the ACER-CEER Market Monitoring Report (MMR) as a key document to understand the evolutions and trends of both the wholesale and retail electricity markets. We think this focus on consumers is especially prescient given the developing situation in the markets. We would like some clarification on which consumers will be considered in the scope of the upcoming report and believe that different consumer empowerment models should be considered for different profiles (e.g., residential consumers need "set and forget" solutions, and public, commercial, and industrial consumers would need a different approach with a more complex and efficient energy management system). We are looking forward to the results of this report and remain available to engage on a bilateral basis on the upcoming edition of the MMR. We believe some discussion is needed on specific indicators included in the MMR, such as the switching rate, which may not always well reflect the market situation, especially over the past two years.

Work item 2:
Report on consumer empowerment and protection during and after crisis (scenarios)

Description:
In light of the recent crisis scenarios in the energy sector, this deliverable will focus on the immediate and long-term effects on consumers and energy retail markets. The report aims to identify measures and strategies to protect consumers during crisis scenarios, discuss options and lessons learnt, and evaluate measures to facilitate the evolution of retail markets and consumer protection. Drawing from previous CEER work on crisis management and consequences, such as the workshops on "Game Changing Crisis" (How current developments may change consumer behaviour in the future. Loosing trust and relaunching consumer activity), the report should also amend the European Commission's Communication on Tackling rising energy prices: a toolbox for action and support. The document will reflect on the advantages and disadvantages of different crisis management instruments and identify regulatory measures to (re)build consumer trust in a liberalised energy market.

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

Eurelectric is looking forward to the results of this report, especially on the long-term effects of particular mitigation strategies taken in different member states to provide relief to consumers due to the energy price shock. The CEP was devised a.o. to further protect the consumers. We would be interested to see some analysis done around the status of the implementation of the CEP and how it may or may not have affected the situation in various member states (which gaps exist between current provisions at EU-level [e.g., which consumer protection measures are already included in the electricity directive] and their implementation at Member State-level [e.g., are there any shortcoming in local transpositions / implementation decisions / choices?]). We would also like some clarification on how this report will amend the European Commission's Communication – is a legal action planned?

Work item 3:
Review of the metrics in CEER's 2017 Handbook for National Energy Regulators in light of the CEP implementation

Description:
CEER acknowledges the fact that the 2017 Handbook for National Energy Regulators and its metrics are dynamic by nature since legislation evolves as well as national circumstances. This means that CEER will look into reviewing the metrics periodically and

propose updates or changes to the metrics and/or definitions when necessary. In particular, CEER will verify whether the metrics have to be adjusted or complemented with additional metrics considering that most of the acts under the Clean Energy for All Europeans Package (CEP) will have entered into force by 1 January 2021.

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

Eurelectric welcomes this work and looks forward to the update. We are also curious to see what results CEER finds when it comes to the implementation of the CEP across the Member States given the entry into force of 1 January last year.

We feel a higher emphasis on the role of smart meters could be envisaged by CEER. A European-wide vision on how metering and access to data and the functionality of relevant customer assets today should be accelerated in a consistent way following industry developments in IoT and communication technologies. From a customer perspective, the grid edge and metering should develop rapidly, providing them with better visibility into their energy consumption, and enabling the full deployment of new market models (like demand response) which will drive engagement and further empower customers to fully participate in the energy transition.

Work item 4:
Self-Assessment Status Report 2023 for the Roadmap to Well-Functioning Retail Markets

Description:
This fifth Status Report continues to implement the framework developed by CEER in its 2016 "Roadmap to well-functioning retail energy markets in Europe". This framework aims to deliver reliable, affordable, and simple-to-use services to ensure the protection and empowerment of consumers by 2025. The self-assessment process can be described as a journey that starts with data collection, a reflection, and a gap analysis, leading to national recommendations and the monitoring of their implementation.
The CEER Roadmap to well-functioning retail energy markets in Europe is part of CEER's pledge to realise the core principles of the CEER-BEUC 2020 Vision and the objectives set out in ACER's Bridge to 2025: Conclusions Paper

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

We highly value this report as it provides very useful input for evidence-based discussion on major issues related to consumers in the context of the continuing implementation of the CEP and the heightened ambition from the Commission in their Fit for 55 and REPowerEU packages.

Work item 5:
CEER Cybersecurity Report on Europe's Electricity and Gas Sectors

Description:
Mapping the state of play of respecting cybersecurity in electricity and gas sectors

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

Eurelectric welcomes this report and finds the work around cybersecurity is well-timed, given the Commission's recent publication of its Digitalisation Action Plan and the ongoing work in the sector to further digitalise the value chain from generation to end-user delivery.

This should be addressed in light of the recent adoption of the NIS2 Directive and the upcoming implementation of the Cybersecurity Network Code on cross-border flows of electricity.

Then, it is not clear whether the mapping report will only focus on DSOs or the entire electricity system stakeholders, as they too must implement cybersecurity measures in their respective activities. Considering growing threats to the electricity sector, we would suggest CEER build a transversal programme on cybersecurity issues.

Work item 6:
High Market Prices Report

Description:
Energy commodity prices have reached unprecedented high levels across Europe. While various factors have contributed to the high energy prices in Europe, the main driver is the surge in the price of natural gas. RES WS will continue to engage with stakeholders and NRAs to display the reasons and state of play of the high market prices across Europe.

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

Eurelectric is interested in the outcomes of this report and remains available to exchange bilaterally to support the development of this deliverable.

A clear distinction should be made in the analysis between short-term wholesale market prices and consumers' prices. In particular, it would be interesting to get a view on the structure of consumer prices across Europe: fixed / variable / dynamic contracts, indices retained for setting up contracts, market-based vs asset-based formulas, role of suppliers in providing appropriate hedging for consumers, role of suppliers in identifying the risk profile of their consumers, existence of additional initiatives on energy efficiency, energy savings, self-production/consumption, etc.

Work item 7:
RES Support Systems Report

Description:
The report is aimed to map the current approach to foster renewable energy deployment as defined by the Renewable Energy Directive 2018/2001/EU (RED II) in the EU. This report is prepared every two years.

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

Eurelectric finds this report very useful and remains available to exchange bilaterally to support the development of this deliverable. Beyond the elements that foster renewable energy deployment, it would also be interesting to analyse and to quantify to the extent possible the blocking factors for such a deployment. For instance, one could think about the permitting issues: how much time is needed to get a permit free of recourse?

Work item 9:
Regulators' reflections on enabling the injection of renewable and low-carbon gases and ensuring their access to the wholesale market, including any impacts on the functioning and design of entry-exit systems

Description:
Regulators' reflections on enabling the injection of renewable and low-carbon gases and ensuring their access to the wholesale market, including any impacts Building on their work in 2022, CEER will continue to reflect on enabling the injection of renewable and low-carbon gases and ensuring their access to the wholesale market. This is a particularly hot topic in light of the Hydrogen and Gas Market Decarbonisation Package and will need further reflection from regulators in 2023. The paper will aim to clarify the scope entry-exit systems for decarbonised gases to avoid misinterpretations and over-regulation of the distribution level. Moreover, NRAs will aim to ensure the participation of local producers in the wholesale market via alternative solutions to full integration of transmission and distribution levels. This work item will be conducted with a certain flexibility regarding the ongoing legislative process in the European institutions and to the activities done under the Hydrogen and Decarbonised Gas Markets Package work item.on the functioning and design of entry-exit systems

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

We invite CEER to clarify what it exactly intends to investigate - or review - on the scope and definition of entry-exit systems for the application to renewable and low-carbon gases. Entry-exit systems have been a cornerstone of the gas market design for 2 decades and have proven their effectiveness for emergence of robust wholesale gas markets across the EU.

Work item 14:
Financial Regulation and the links to REMIT

Description:
Gas and electricity markets have their own dedicated regulation to address market abuse and transparency – the REMIT. Recently, there have been some attempts to revise the existing legislation in a restrictive way and replace energy regulators with financial regulators in supervisory tasks for the concerned products. CEER has publicly stated that this would be inappropriate, inconsistent, and inefficient considering the experience gained in this field by energy regulators. NRAs must regularly coordinate with national and European financial regulatory authorities to ensure proper energy market functioning from a regulatory perspective. Moreover, the recent increases in wholesale electricity and gas prices, as well as in CO2 emission certificates, led to increased margin requirements by Clearing Houses, potentially precipitating supplier insolvencies. CEER will continue to monitor this specific situation in order to ensure proper market functioning.

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

Eurelectric finds the REMIT-related reports very useful. We have not taken a position on whether the proposed changes to the REMIT legislation to replace energy regulators for financial regulators is appropriate, but we are interested to here CEER's view on this and to see their findings on the impact of the increased margin requirements on supplier insolvencies. This is currently a key issue in the energy market, and we are happy to contribute when possible solutions are being considered. This is currently a key issue in the energy market and we are happy to contribute when possible solutions are considered.

Eurelectric pursues in all its activities the application of the following sustainable development values:

Economic Development

- Growth, added-value, efficiency

Environmental Leadership

- Commitment, innovation, pro-activeness

Social Responsibility

- Transparency, ethics, accountability

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