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powering people

DG ENER public consultation for the Citizens' Energy Package

A Eurelectric response paper

September 2025

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.

Dépôt légal: D/2025/12.105/43

Customers & Retail Services Committee
WG Retail Market Design
WG Customers & New Services

Contact:
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Citizens Energy Package for a Just Transition and Consumer Empowerment

A Eurelectric response paper September 2025

EXECUTIVE SUMMARY

- Eurelectric submitted its **opinions** on consumer and retail market topics to both a **targeted and public consultation** that will feed into the upcoming **Citizens' Energy Package**.
- Focusing on **consumer protection and empowerment**, the Package will recommend ideas and **best practices** to Member States on the implementation of consumer-related provisions of the revised Electricity Market Directive.
- It will be published in **Q1 2026** as a **Commission Communication** including multiple **non-binding guidance documents**.

Implementation and action on national level

The main actions to materialise consumer rights, empower consumers, and fight energy poverty must happen on national and local level. The Citizens' Energy Package will complement the ample existing EU legislation guiding and prompting Member States to act in these areas. Hence, Eurelectric sees the implementation of the consumer-related provisions in the Clean Energy Package and revised Electricity Market Directive as the most important key driver for effective multi-stakeholder actions on the ground.

Check out these use cases and Eurelectric's commitments to find out what suppliers are doing to empower and support their customers in the transition.

Consumer rights and participation

Eurelectric responded to both a targeted and public consultation on the Citizens' Energy Package by DG ENER. Our messages amongst other topics:

- **Electricity disconnections**: social policy and preventive measures instead of bans, supported by best practices from Member States
- **Pre-contractual information**: key principles for conveying these to consumers can be set at EU level, but the decision about content and format (contractual elements, templates, level of standardisation, common terminology) should be decided at Member State level
- **Demand flexibility in retail contracts**: well-functioning and competitive market environment allows not only for contract choice but also innovation such as hybrid contracts that could spark consumers' interest to engage more with market price signals if chosen

Contribution ID: 29f25f14-e7ec-4608-9ba4-6bc5c73eda07
Date: 11/09/2025 16:36:34

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

*First name

Tim

*Surname

Vogt

* Email (this won't be published)

tvogt@eurelectric.org

* Organisation name

255 character(s) maximum

Eurelectric

* Organisation size

- Micro (1 to 9 employees)
- (selected) 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.

4271427696-87

* 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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- Cambodia
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- Canada
- Cape Verde
- Cayman Islands
- Central African Republic
- Chad
- Chile
- China
- Christmas Island
- Clipperton
- Cocos (Keeling) Islands
- Colombia
- Guatemala
- Guernsey
- Guinea
- Guinea-Bissau
- Guyana
- Haiti
- Heard Island and McDonald Islands
- Honduras
- Hong Kong
- Hungary
- Iceland
- India
- Indonesia
- Iran
- Iraq
- Ireland
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- Israel
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- Jersey
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- United Kingdom
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- Congo
- Cook Islands
- Costa Rica
- Côte d’Ivoire
- Croatia
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- Curaçao
- Cyprus
- Czechia
- Democratic Republic of the Congo
- Denmark
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- Yemen
- Zambia
- Zimbabwe

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

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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.

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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

i. General Comments In general, it is the job of Member States to ensure that consumer rights become concrete by transposing and implementing EU legislation, in particular the Clean Energy Package and revised Electricity Market Directive, or by introducing their own national consumer protection legislation. The EU legislative framework already provides sufficient substance and guidance to support and prompt national governments to act in this area. Further guidance will follow through the Citizens' Energy Package giving national actors additional ideas for national solutions. Overall, at this stage, as a priority, actions need to primarily happen at national and local level and not on EU level. ii. Member State/national level Having said that, we would highlight the implementation of pre-contractual information as a particularly important aspect for Member States as it will help customers to better understand and decide on retail contract offers. Eurelectric and other stakeholders have suggested key principles for the summary of key contractual information as pre-contractual information. For this, please refer to section 4. and 5. of the report 'on pre-contractual information' submitted to DG ENER Unit B1. This report was compiled by stakeholders of the 'working group on energy consumers' convened by DG ENER Unit B1 in the first half of 2025 (targeted consultation). Addressing, identifying and defining energy poverty and vulnerable customer needs to primarily happen on Member State level. National and local actors are most apt to act based on the national context and various specificities. Examples of possible priority actions on national level that could strengthen consumer rights and contribute to fighting energy poverty beyond social policies: • Define clear strategies and roadmaps of implementation actions to fight energy poverty. For instance, National Energy Poverty Action Plans with clear timelines and accountability mechanisms including how national governments can support municipalities in developing local action plans. Member States to provide updates on their national actions and best practices to the EU Energy Poverty Advisory Hub • Create or expand One-Stop-Shops that address or counselling points that provide specific information for energy efficiency actions, consumer rights, energy bills, financial aid etc. • Ease commercial service procedures for the most vulnerable, for instance, faster service attention for elderly, disabled customers, single-parent families. • Accelerate digitalisation while safeguarding inclusion, i.e. ensuring support for digitally vulnerable users, including older consumers and those with limited internet access. • Prioritise building renovation and energy efficiency as long-term structural solutions to energy poverty, including social housing upgrades. For instance, through awareness campaigns on energy efficiency and available financial support. • Encourage local partnerships between municipalities, utilities, construction providers, NGOs, and social services to deliver coordinated support for such renovations and upgrades. • The revised Electricity Market Directive stipulates in article 11 that 'final customers who have a smart meter installed can request to conclude a dynamic electricity price contract [...]'. To materialise this entitlement for consumers and to increase access to such contracts Member States with a low share of installed smart meters (see latest ACER report) should urgently accelerate the rollout of smart meters. Regarding the definitions of energy poverty and vulnerability, it is essential that Member States consider a combination of criteria rather than using standalone criteria to accurately identify a justified scope of vulnerable and energy-poor consumers. The revised Efficiency Directive (Article 2(52)) from 2023 already provides orientation and guidance for Member States through a new definition of energy poverty. iii. EU level Regarding energy poverty, the EU should continue its work through the EU Energy Poverty Advisory Hub, i.e. providing analyses to monitor energy poverty in the EU, sharing best practices and uses cases, and empowering local initiatives. This is the best way to support and inspire national and local actors in implanting actions and in directly solving the issues on the spot. Finally, access to affordable energy can be eased by reducing energy taxes. On EU average, electricity is currently taxed 1.3 to 1.4 times more than gas. To this end, we urge to finalise the revision of the Energy Taxation Directive (ETD) to ensure a balanced taxation of gas and electricity.

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

i. Energy/electricity taxes. Member States should exhaust the option of reducing these taxes to the allowed EU minimum. This would allow retail prices to drop, and thus reduce energy costs for consumers. On EU average, electricity is currently taxed 1.3 to 1.4 times more than gas. ii. Split incentives/tenant-landlord dilemma when it comes to investing and benefitting from energy efficiency measures. iii. In many Member States, missing access to retail contract offers with dynamic/variable price elements. Generally, consumers should be allowed to decide which contract fits their risk profile and aligns with their preference to engage with price signals. However, it is increasingly important for citizens to change their energy consumption habits in response to volatile renewable energy generation, the needs of the grid and to reduce grid management costs. Retail contracts with variable or dynamic price elements are not available for all European citizens. This is mainly due to the insufficient rollout of smart meters in many Member States and a low degree of competition in retail markets in a few Member States where innovative offers cannot flourish. ACER has highlighted both aspects in their last retail market monitoring report. With regard to exposing energy poor and vulnerable consumers to wholesale market price signals, hybrid contracts could be a viable solution as they combine price stability with controlled exposure to price signals, hence represent a soft introduction to demand flexibility/implicit demand response. Another option for those consumers could be contracts with time-of-use tariffs. However, in the end it is up customers to decide whether such contract meets their preference. The Citizens' Energy Package should analyse and highlight best practices/uses cases from Member States where such types of offers are available and where consumers have chosen them, including vulnerable and energy-poor cohorts, contributing to flexible consumption.

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
- [x] 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
- [x] 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 *(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)*	●	○	○	○	○	○
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

Please refer to the measures and examples listed in section 3.2. – 3.4., 3.7., 4.2 to 4.4 of the report on ‘protection from disconnections’ submitted to DG ENER Unit B1. This report was compiled by stakeholders of the working group on energy consumers convened by DG ENER Unit B1 in the first half of 2025 (targeted consultation).

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

Please refer to the measures and examples listed in section 3.2. - 3.4. and 4.2 - 4.4 of the report on ‘protection from disconnections’ submitted to DG ENER Unit B1. This report was compiled by stakeholders of the working group on energy consumers convened by DG ENER Unit B1 in the first half of 2025 (targeted consultation). We would like to highlight one particular multi-stakeholder example from the Netherlands where suppliers can notify municipalities when payment arrears arise, allowing municipalities to intervene: Resolving debt is the responsibility of municipalities, as is the organisation of debt management schemes. Suppliers partner with social services as part of an ‘early warning system’ to detect potentially unreported cases of vulnerability. Suppliers inform the agency in question about the customer’s payment situation so social services can reach out to the customer and verify whether the customer is at risk of energy poverty or vulnerability. This is provided that data protection rules allow for the customer information to be shared. Suppliers generally accept the debt management schemes proposed by municipalities. The regulator oversees compliance with rules designed to prevent disconnections, which are generally allowed except for individuals who rely on electricity for medical reasons. So far, suppliers in the Netherlands have reported effective collaboration with municipalities, as reflected in various covenants and regulations.

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

Please refer to the measures and examples listed in section 3.2. – 3.4., 3.7., 4.2 - 4.4 of the report on ‘protection from disconnections’ submitted to DG ENER Unit B1. This report was compiled by stakeholders of the working group on energy consumers convened by DG ENER Unit B1 in the first half of 2025 (targeted consultation). More best practices not mentioned in that report: Spain: Energy efficiency and Social Support Programs Spain has developed a multi-level strategy to tackle energy poverty, combining financial aid with energy efficiency improvements: Bono Social Eléctrico y Térmico • Electricity Social Bonus: Discounts of on electricity bills. In 2025, discounts are as of 1 July: 42,5% for vulnerable consumers and 57,5% for severely vulnerable consumers until the end of the year • Thermal Social Bonus: annual financial aid for heating, based on climate zone and vulnerability level. Home Renovation and Efficiency Grants · In 2025, energy renovation grants for housing are primarily managed through the Recovery, Transformation and Resilience Plan (PRTR), funded by the European Union’s NextGenerationEU funds. · Programs such as PREE and PREE 5000, financed by these European funds, allow for the following: o In cases of vulnerability, the subsidy can cover up to 100% of the cost of energy renovation. o Priority is given to actions in rural areas or areas with lower population density, where energy vulnerability tends to be more pronounced. Alleviation of Debt accumulation: • Vulnerable customers who request it to suppliers can reach payment agreements to split their debt and repay it in instalments that they can possibly afford. • Electricity retailers sign agreements with the Autonomous Communities to inform them of customers who have received a disconnection notice due to non-payment, so that municipal social services, through their social affairs budgets, can help cover the customers’ bills and assist them in applying for the social tariff • Debt cancellation mechanisms: In some cases, energy debts of vulnerable families have been written off, especially by signing agreements on poverty alleviation with Autonomous Communities, whereby historical debt is cancelled but there’s a strong commitment to promote vulnerable customers to apply for social tariff. Germany (disconnection procedure): 41b EnWG/§19 Strom GVV provide the legal basis for a forced disconnection, with different degrees of pre-requisites needed to be fulfilled for a "regular" supplier and the "supplier of last resort". Disconnections in the first case (regular supplier) requires only the non-payment of the bills as a pre-requisite. In the latter case (supplier of last resort), several pre-requisites need to be fulfilled to allow for a forced disconnection (setting suitable deadlines to allow for getting assistance from the state); a disconnection must furthermore be proportional. Jurisdiction has set some criteria, where a disconnection is usually seen as disproportional has been collected in "Hempel/Franke, Recht der Energie- und Wasserversorgung, § 33 AVBEltV Rdnr. 168ff." Italy: · Ban on disconnection and specific discount on bills for customers in critical health conditions requiring electricity powered devices. If applicable, the health conditions discount will be added to the low-income discount. Suppliers are obliged to propose customers to pay in instalments, based on terms defined by the Authority, in specific cases where the bill amount can be considered “anomalous”. · Specific additional supporting measures are in place for customers living in areas affected by natural disasters such as earthquakes and floods. The measures are temporary and proportionate to the severity of the damage caused, and may include ban on disconnections, bill reductions, suspension of bill payment deadlines, instalment payments. · Price protection for all vulnerable customers by means of a dedicated tariff set by the Authority (“vulnerability service”). The definition of “vulnerable customer” in Italy is broad and includes low-income customers, customers in critical health conditions, disabled customers, customers living in non-interconnected islands or in temporary dwellings following natural disasters, customers over 75 years of age. · System charges (so-called “Oneri Generali di Sistema” - OGdS), representing approximately 20% of the entire bill in 2020-21, are paid by the final consumer and intended for the financing of renewable energy and other activities of general interest for the national system. Following the 2021-22 energy crisis, the government eliminated the OGdS in the bill from September 2021 to March 2023 for all consumers, reintroducing them only in the second quarter of 2023. This measure guaranteed all consumers considerable savings.

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		X				
Legislation				X		
Capacity building support				X		
Funding				X		
Other	X					

For 'Other', please specify:

2000 character(s) maximum

• Clear, streamlined, simplified regulation is essential: while the market design reform broadens the concept of energy sharing, it leaves the provisions in the RED unchanged. As a result, overlapping and inconsistent definitions persist, creating confusion and hindering effective implementation. Simplification is what EU legislation should look for to make implementation & transposition easy and efficient. • Regarding supplier license requirements, some MSs have no requirements to become a supplier. The bankruptcies seen over the crisis were in part due to suppliers that lacked the knowledge, the processes, the skills to enter this activity. We understand the social role of energy communities, but when they engage in market activities, they should be framed under the same rules as suppliers. Being a supplier entails responsibility and commitment (both financial and operational) with consumers, DSOs, TSOs, NEMOs or other counterparties (like a PPA seller), authorities. • Define a regulatory framework that guarantees anticipatory investments for client establishment. • One-stop-shops to provide information and knowledge for those considering energy communities activities, namely through the implementation of the point of contact already defined in EMD for overall energy sharing. • Advance regulation on interoperability, standards, data management and other technical regulation. • Encourage Member States to test innovative tariff structures, peer-to-peer trading, or aggregator models through regulatory sandboxes, with coordination at EU level. • Member States would also benefit from having more detailed guidelines, exchanges of best practices to support implementation at national level. For instance, promote best practices from frontrunner countries (e.g. Spain, France, Germany), but also innovative business models and regulatory sandboxes to inspire replication in lagging regions.

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

Maximum 6 selection(s)

- [x] Permitting and licensing
- [x] Access to financing and information
- [x] 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

- [x] 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 organisor	◉	○	○	○	○	○
Involvement of energy poor and vulnerable households	◉	○	○	○	○	○
Other	◉	○	○	○	○	○

For 'Other', please specify:

2000 character(s) maximum

• The new rules could aim to reduce contractual complexity and the administrative burden on small consumers, but this must not transfer this burden to electricity suppliers. However, responsibilities and billing requirements will naturally lead to the professionalisation and centralisation of the activity, with the possible emergence of dedicated platforms to manage the necessary documentation. It is essential that all actors in the sector are subject to the same rights and obligations to ensure fair and non-discriminatory treatment. The organiser should focus on administrative aspects, as balance responsibility is already effectively addressed under the existing regulatory framework. For this reason, it is important to establish a clear framework that distinguishes between what constitutes a professionalised energy sharing activity and what does not. Many professional market actors are developing services in this field and must ensure adequate consumer protection for the energy they provide. Ultimately, this is a supply contract that requires the capacity to offer customer support, accurate billing, transparent contracts, knowledge of market dynamics, responsibility for payments to the system operator, financial guarantees, or the delegation of these functions to competent entities. · Clarification about the different archetypes of energy sharing and what set of rules apply to each, namely distinguishing between the more "business-like" energy sharing, where more supplier-like obligations may be imposed, in particular to emerging businesses from agents not covered under the scope of energy regulation. · Regulating the internal activity of an energy community (rights and duties of members, settlement mechanisms, litigations arbitration, etc) is not in the NRA portfolio of responsibilities. Examples of good practice are needed to support establishment of such legal entities.

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

5000 character(s) maximum

• Guidance on set-up of citizens communities, by laws, governance, fiscality, reporting, transparency, platforms available for exchange of energy, information, money among community members. • Is there a need for an administrator of the citizens community? Should such administrator be licensed? Should there be interface with an aggregator? With a Balancing Responsible Party? Examples of contractual arrangements might be useful. • In Italy, data management is carried out by the DSO, the third party called GSE ("Gestore Servizi Energetici"), and the Renewable Energy Community. The DSO shares the following data on a monthly basis: i) electricity produced by the power plants belonging to the configurations; ii) electricity injected into the grid by the power plants belonging to the configuration, and iii) electricity withdrawals by end customers who are members of the configuration. The GSE collects the metered data and makes it available for the Renewable Energy Community. Moreover, in Italy the energy sharing is virtual, meaning that the self-consumption is reconstructed ex-post from actual consumption data within the configuration, and it is equal to the portion of electricity shared between producers and end consumers participating in the energy sharing. It is equal, in each hour, to the lower value between the electricity fed into the grid by the renewable installation and the total sum of electricity withdrawals attributed to end customers who are members of the configuration. In this virtual energy sharing scheme, each final consumer continues to purchase electricity taken from the grid by choosing the commercial offer considered most appropriate, and each producer continues to sell its electricity fed into the grid in the preferred manner. Such virtual energy sharing generates a government incentive (tariff premium) that is paid by the GSE (Gestore Servizi Energetici) to the Renewable Energy Community that distributes the incentive among the members as established by a private law contract signed between the members. To access the tariff premium the plant and the configuration need to meet the following requirements: i) the maximum nominal capacity of the new or upgraded renewable plant is 1MW per power plant; ii) the power plants and the consumption points are connected to the distribution grid through existing connection points belonging to the same primary substation. According to the legislative framework, any amount above 55% of the maximum obtainable yearly incentive must be shared by the Renewable Energy Community with its non-business members or used for local social initiatives. Furthermore, REC receive from the GSE a network tariff refund on energy shared between producers and end- consumers located below the same primary substation. Standard supplier contracts therefore remain necessary to ensure continuous supply when self-production is insufficient. To foster a robust and equitable environment for these initiatives, it is imperative that the EU issues clear guidelines on the allocation of responsibilities among all stakeholders. This guidance should specifically address critical areas such as tax collection, network tariff billing, and the payment of non-fiscal elements, ensuring clarity and fairness for all participants.

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
Benefit: Lower electricity costs for consumers	◉	○	○	○	○	○
Benefit: More efficient management of the system and lower prices overall	◉	○	○	○	○	○
Benefit: Better integration of renewable energy sources	◉	○	○	○	○	○
Benefit: Improved grid stability	◉	○	○	○	○	○
Benefit: Increased consumer engagement and awareness, leading to better energy management	◉	○	○	○	○	○
Benefit: Other	○	○	○	○	○	○
Challenge: Lack of smart metering infrastructure	◉	○	○	○	○	○
Challenge: Insufficient regulatory framework	○	○	○	◉	○	○
Challenge: Lack of standards or guidelines for dynamic or hybrid energy supply contracts	○	○	○	○	◉	○
Challenge: Absence of dynamic or hybrid energy supply contracts	○	○	○	◉	○	○
Challenge: Inconsistent regulatory approaches and national practices across the EU	○	○	○	◉	○	○

Challenge: Other	○	○	○	○	○	○

Benefit: For 'Other', please specify:

2000 character(s) maximum

Challenge: For 'Other', please specify:

2000 character(s) maximum

Consumer profiles: A prerequisite to advance broad behavioural change towards more flexible energy consumption is to acknowledge different consumer profiles. Consumers advance at different levels and pace on their energy transition journey. Useful differentiation: 1. Engaged consumers: generally willing to engage, either prosumers (fully engaged) or those who use smart meters, innovative contracts, smart energy management systems 2. Undecided consumers: inhibitions to participate or risk averse 3. Disengaged consumers: unaware of options or indifferent to participate 4. Constrained consumers: cannot or only hardly participate due to personal or external circumstances such as financial or housing situation or digital illiteracy that prevent them from making independent decisions. For instance, vulnerable and energy-poor consumers Hence it is important to differentiate between consumer groups based on their capabilities, possibilities, and willingness to engage through demand flexibility. Every consumer group needs to be approached in a dedicated and tailored way to tap into and maximise their engagement potential without imposing contracts on them. That potential for flexibility also depends on their specific uses (such as water heaters, heating, electric vehicles, etc.) and the type of equipment (such as heat pumps, water tanks etc.). Hence, consumers should be allowed to decide which contract fits their risk profile and aligns with their preference to engage with price signals. Awareness: Demand flexibility requires consumers to change their energy consumption patterns towards more deliberate planning. Attaining such broad structural behavioural change towards more flexible consumption is a marathon and takes time. The first step is to inform customers and raise awareness of their demand flexibility options.

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

Well-functioning and competitive retail markets based on market-based supply prices. This facilitates the development of flexibility and increases the incentive for consumers to choose a contract that benefits flexible consumption according to direct or indirect market price signals. Also, this market environment is indispensable for suppliers to innovate and develop new products, services, and customer solutions that support consumers' participation in the transition. Most importantly, competitive retail markets guarantee contract innovation and contract choice for consumers so that they can choose the supplier that offers the best rates, value, and support and choose according to their personal preferences and capabilities to participate in the transition. For instance, prosumers might be more inclined to choose a fully variable price contract while other consumers might prefer hybrid contracts or contracts with fixed time-of-use elements.

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

Regulators must ensure that consumers who subscribe to dynamic pricing offers have continuous access to market data and hourly day-ahead prices. This access is crucial, enabling consumers to plan their consumption effectively and respond strategically to price signals.

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

In general, raising awareness is a multi-stakeholder task. Action in these areas can happen on all levels mentioned but is at this stage most effective on national and local level through the following. i. Awareness about consumer protection and rights • Physical/digital ‘one-stop-shops’ that provide technical support to citizens, information and advice on energy efficiency, or renewable energy and financing programs for energy improvements. For instance: Rede espaço energia from ADENE, the Portuguese Agency for Energy; Observatório Nacional da Pobreza Energética from the Portuguese Strategy to fight energy poverty. ii. Awareness about opportunities for consumer participation Examples of possible actions of energy suppliers on national and local level: • Personalised messaging and reminders about offers or tips about energy efficiency and demand flexibility. This can be particularly promising during moments of change when customers are more prone to change habits, for instance: investments in new appliances or moving houses/apartments. • Ad-hoc reach out to customers (emails, texts, SMS, app notifications) if they agreed to be contacted: informing them about one-off events like low price hours on the next day so they can save costs by shifting their consumption to those low-price hours (demand flexibility) or earn rewards by increasing the demand of their demand response technologies (EV or battery storage). • Offer customer services in different languages and operate physical customer service points where feasible and necessary. This caters to customers’ varying capabilities and preferences in engaging with their supplier. • Communicate content and benefits that are understandable, persuasive and appealing to all customer target groups and their individual motivations to maximise their potential to engage. Consumers are driven by various motives to engage: cost savings, trying a new technology, reducing environmental impact, improving health, increase property value, energy autonomy/self-sufficiency etc. • Share stories about customers’ positive experience with participative actions to trigger positive feedback loops. This initiates peer conversations amongst consumers and could convince undecided or unaware consumers to engage. • Improve visualisation of peak-price & off-peak hours in demand flexibility apps through graphs and visualisation so customers can make informed and strategic decisions. • Please find more information in the attached document (‘use cases’) about what European energy suppliers are doing to empower their customers to participate in the energy transition. Possible multi-stakeholder actions at national and local level: • Concerns about how suppliers use personal data, about the reliability and suitability of heat pumps and EVs, and about potential hidden costs loom large when consumers contemplate decisions. These concerns and misconceptions need to be proactively addressed those by transparently sharing balanced and evidence-based information. • Public information campaigns explaining the bigger picture: o educating consumers on the understanding of on- and off-peak hours and how to shift consumption to off-peak hours. o demand flexibility on a broad scale reduces peak demand hours and thus reduces the need for fossil fuel power generation during those peak hours ultimately reducing final electricity prices • Foster collaboration between electricity stakeholders: joint initiatives between suppliers and system operators to simultaneously and temporarily run demand flexibility campaigns and demand response programs to maximise the impact of customers’ peak demand reduction. Example: ‘Energy on Time’ (Finland) Energy on Time is a national wide information campaign. It’s a website, which collects practical information for consumers on the flexible use of electric heating, domestic hot water heating, electric car charging and household appliances. The website compiles information on the benefits and methods of demand response. During the energy crisis winter of 2022–2023, many Finnish households started to schedule their own electricity use. For many, however, the reason and means of timing are still strange. The campaign website explains these reasons and means. The aim of the campaign is to help consumers understand how demand response saves money and reduces the load on the electricity grid. The campaign page has also been used by other companies, such as energy service companies and electricity suppliers. More information about the Energy On Time campaign: Ajoita Ajoissa – Ajoitus ratkaisee NRA actions: • ACER highlighted in its last Retail Report that some Member States fall short of fulfilling the obligation of Article 14 in the Electricity Directive to introduce at least one independent comparison tool. Hence, every Member State should introduce such independent tool or website which will alleviate the issues listed in the following bullet points.

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

In general, it is the job of Member States and national actors (local authorities, suppliers, consumer groups, NRAs, and civil society) to ensure that consumer rights, protection and empowerment benefit consumers by transposing and implementing EU legislation, in particular the Clean Energy Package and revised Electricity Market Directive, or by introducing their own national consumer protection legislation. The EU legislative framework already provides sufficient substance and guidance to support and prompt national governments to act in this area. Further guidance will follow through the Citizens' Energy Package giving national actors additional ideas for national solutions. Overall, at this stage, as a priority, actions need to primarily happen at national and local level and not on EU level. EU Legislation for comparison tools It is not crystal clear whether the requirements presented in article 14 of the Electricity Directive apply to independent comparison tools only. In any case, these requirements – except for the obligation to be independent - should apply to all comparison tools, including non-independent ones, and intermediary platforms. Also, a legal definition of what constitutes a 'comparison tool' is still missing in EU legislation. The Commission should clarify the application of these requirements and come up with a definition at least in the Citizens' Energy Package to strengthen consumer protection rules. Please refer to section 3.10 and 5.5.1. of the aforementioned report on pre-contractual information for more details, explanations and ideas on this topic. (Third party) intermediary platforms A distinction should be made between platforms which only provide comparison tool services and (third-party) intermediary platforms which not only provide comparison tool services but also facilitate commission-based contract switching directly through their platform (typically websites and/or apps). For consumers, it is not always clear and evident whether they are using a comparison tool or an intermediary platform. Intermediary platforms are directly influencing the customers' product selection, especially when directing unaware customers to a sponsored offer. This can confuse customers and influence their decision-making. This raises concerns about how these intermediary platforms meet requirements of transparency and consumer protection. Hence, first, intermediary platforms (but also platforms just offering a comparison tool service) should clearly indicate when offers are sponsored content or paid for by suppliers, for example by labelling them as 'advertising' or 'promotional'. Also, second, as the regulatory framework targets 'traditional' energy suppliers only, these intermediary platforms should be subject to the same requirements as energy suppliers to ensure a level-playing field. A separate regulatory framework might be required for these entities on EU or national level when the service goes beyond price comparison.

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

Eurelectric has published a paper on real-world best practices for community engagement and benefit-sharing mechanisms in RES development (https://www.eurelectric.org/wp-content/uploads/2025/04/Eurelectric-Social-Acceptance-Best-Practice-Paper.pdf). Key considerations for enhancing social acceptance of renewables and related infrastructure include: • Public and private cooperation to align messages on renewables as essential drivers of competitiveness, energy security and decarbonisation. All stakeholders should consistently recognise their strategic importance • There is no one-size-fits-all solution: measures must remain voluntary and tailored to each country, project and community • Early engagement with local communities is crucial, particularly where environmental or visual impacts arise. Consulting residents, using local contractors and working with regional stakeholders fosters trust and ownership • Benefit-sharing schemes help link projects with host communities, and many developers already use them. Flexible, voluntary models work best to meet local needs; rigid approaches may backfire. EU and national guidance can encourage knowledge-sharing, legal certainty and transparent frameworks without creating burdens • Full implementation of EU rules -especially REDIII permitting- will strengthen certainty and acceptance. Local authorities need resources, training and digital tools to streamline permitting and enable meaningful citizen input • Local authorities also support acceptance by redistributing taxes to municipal budgets, visibly linking projects to prosperity. They should highlight renewables’ affordability, competitiveness and security benefits while countering disinformation • Repowering existing renewable infrastructure is essential: replacing outdated units with fewer, more efficient ones improves performance and reduces impacts. Recycling and upcycling components further reinforce sustainability, popular support and a fair energy transition

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

The principles presented above serve as good guidance to implement the summary of key-contractual information as pre-contractual information. While there is room to define a minimum set of essential information and elements that should be included in this summary, it should only include elements that are part of the corresponding contract or contract offer. Non-contractual elements should not be required in the summary to prevent information overload and unnecessarily elongating it. Designing a one-size-fits-all approach for a summary is challenging given the diversity of national retail markets and consumer profiles. We recommend letting Member States and their national stakeholders decide on the elements that should be included and presented in the summaries of pre-contractual information for contracts in their domestic market. Member States, such as France and Italy, have already launched processes to standardise the presentation frameworks that suppliers must use when promoting offers to consumers as well as the format of invoices. While such standardisation processes require extensive discussion between regulators and suppliers to ensure they do not impose undue burdens on suppliers or distort market competition, they would generally facilitate comparability of market offers for citizens. This enhanced comparability would, in turn, incentivise consumer empowerment and encourage switching offers, allowing further savings for consumers and stimulating the creation of innovative offers.

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

We highlight the following approaches and examples for regulating the summary of key contractual information as pre-contractual information · France: regulators offer a standard template and accompanying guidelines, though its use is not mandatory. · Greece: the regulator issued a non-mandatory template whose adoption serves as proof of compliance with principles such as transparency, verifiability, and comparability—placing the burden of proof on suppliers who choose to use their own format. This represents an intermediate approach between purely voluntary guidance and mandatory standardisation · Denmark, Germany, and Ireland: regulators provide general guidance and/or regulate the information to be included without prescribing a specific format. In some cases, regulation refers to ‘summaries’ or ‘resumes’. · Finland and the Netherlands: the format and/or content for pre-contractual information are developed collaboratively by regulators, suppliers, and consumer associations. · Italy and Portugal: regulators mandate suppliers to use a harmonised template regulating the content of pre-contractual information. For more details on these examples please refer to Annex II of the attached report on ‘pre-contractual information’. This report was compiled by stakeholders of the working group on energy consumers convened by DG ENER Unit B1 in the first half of 2025 (targeted consultation). Regarding the use of a standard template, it should be up to Member States, in collaboration with national stakeholders, to decide if introducing such templates is appropriate for their domestic market. If standardised national templates are implemented, these could be beneficial for common, straightforward contract types, such as fixed-price contracts with a single rate or flat rate. In general, the summary of pre-contractual information would ideally fit on one page and could be included alongside the cover letter of the contract offer or contract. However, for more complex and unique contracts, it becomes more challenging to define a template that captures all the contractual elements of every market offer in a particular contract category such as those involving dynamic pricing or time-of-use rates. Attempting to create a single template for such contract categories might result in an extended and overly detailed document and hence would run counter to the underlying idea and objective of a summary of key contractual terms and conditions as pre-contractual information. To ensure consumers can compare such complex offers, it might be more effective and practical to rely on independent digital comparison tools as per Articles 14 of the Electricity Directives instead of requiring suppliers to use common templates and expecting consumers to contact various suppliers to obtain pre-contractual information. Certainly, these comparison tools need to be properly designed as in so far that different offers can in fact be compared (e.g., dynamic and fixed prices). The Commission could provide guidance and recommendations in the Citizens’ Energy Package, drawing on examples from Member States where templates have been successfully implemented. Furthermore, Member States and their national stakeholders should decide about the standardisation of terminology. This is nothing the Commission can effectively regulate at European level. Member States are clearly better positioned to decide on this in their national language (e.g., instance the ‘Plain English’ initiative in Ireland).

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

The EMD tries to address the risk observed during the energy price crisis (with some bankruptcies), but it fails to address the primary issue of supplier financial resilience. This should be dealt with from the very early start in granting authorisation and licensing for supplier activity or equivalent to ensure healthy competition and not competition at all cost. This would reduce the need for additional interventions with unintended consequences such as reduced competition, higher costs, and market distortions. In most countries, suppliers currently have extensive and robust internal controls in place, through governance frameworks, risk management and conducting own due diligence. Existing mandatory regulatory reporting and data oversight as well as energy market compliance rules must not be overlooked. · NRAs shall not interfere in setting administrative/regulated hedging rules that limit market agents' ability to hedge as efficiently as possible, especially if these markets are not liquid enough due to a variety of different reasons (price interventions and clawbacks as witnessed during the energy crisis severely hindered these markets liquidity). · Specific instruments should not be imposed on market agents. Instead, focus should be on removing obstacles to efficient hedging for suppliers (e.g. ensuring access to necessary financial instruments). Suppliers shall have full discretion to determine the most appropriate hedging strategies to meet the required coverage and risk management levels, whether through procurement of products on organised markets, execution of PPAs, engagement in OTC transactions or reliance on self-generation. · Setting a minimum share of certain instruments is unlikely to result in the most efficient and low-cost hedging, with negative effects for the consumers. Therefore, setting minimum quotas for PPAs does not seem suitable. If those markets are liquid and efficient, market participants will naturally use those tools.

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

• Well-informed consumers might be aware of that electricity is taxed more than natural gas. Reducing electricity taxes would encourage further investments in electrical solutions, reduce household energy bills, and ultimately incentivise the shift to electricity for heating and cooking. • Insufficient awareness and understanding of the benefits of alternative technologies that electrify energy consumption. This significantly hinders both the ability to replace or upgrade equipment and to access available funding opportunities. Even identifying relevant funding sources can be overwhelming, leading to confusion, inaction, or reluctance to pursue upgrades or renovations. 'One-stop-shops could play a vital role by offering accessible, personalized support to citizens.

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

The municipalities and social service entities can play an important role in the transition from gas to electricity in social housing. Many consumers in energy poverty are in rented houses and for some these are houses owned by municipalities or public entities or even by third-sector (owned or contractually managed).

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

Germany: Under the Heat Planning Act (Wärmeplanungsgesetz), municipalities are required to develop local heat plans and carry out public consultations. When deciding to decommission parts of the gas grid (cf. Article 57 Gas-Directive), cities/utility companies are giving residents up to 10-years notice. This long lead time enables consumers - particularly vulnerable groups - to plan financially ahead and switch to alternative systems (i.e. district heating) without undue pressure. The German consumer association vzbv has endorsed the 10-year advance notice as best practice. This model ensures local ownership, avoids lock-in effects, and supports fairness in the energy transition.

Contact

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

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Environmental Leadership

- Commitment, innovation, pro-activeness

Social Responsibility

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