



Fostering energy markets, empowering **consumers**.

Evaluation of Responses

Stakeholder comments on CEER Work Programme 2020

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EXECUTIVE SUMMARY

The Council of European Energy Regulators (CEER) appreciates and welcomes the comments and feedback received to the public consultation on its draft 2020 Work Programme (WP). A total of 19 respondents submitted their views. We received feedback on specific questions related to our priorities in 2020 (the draft Work Programme work areas) as well as individual work items. Overall, although there were detailed differences of views, respondents expressed strong support for our proposed draft 2020 Work Programme work items.

CEER has reviewed its draft 2020 Work Programme to take into account suggestions made by stakeholders and has provided further clarification and detail on the planned work items. The final Work Programme also reflects recent developments in energy policy at European level, in particular as regards the EU Green Deal proposals as well as regulators' further thinking on timely energy regulatory trends and issues. As a result, regarding the 2020 Work Programme, 22 work items will be pursued by CEER during 2020, alongside a range of ongoing activities and carry-over items from 2019 Work Programme.

This evaluation of responses document accompanies the final CEER 2020 Work Programme and provides CEER's considered reaction to the comments submitted.

1. Stakeholder feedback and comments

1.1. General comments on the draft CEER 2020 WP

In general, stakeholders expressed their strong support of the four proposed areas of principal relevance (Customers and Retail Markets, New Legislative/Policy Developments, Distribution System Operation and International work beyond the borders of the EU) for CEER's Work Programme in 2020 and agree it will be shaped by implementation of the CEP and our own 3D Strategy. CEER's views responding to stakeholders' specific comments are included in the table in section 1.3 of this document. We have also examined the planned work items in the light of comments received on the 3D Strategy. Stakeholders noted in more responses that CEER's 2020 prepared Work Programme successfully meets the challenges posed by energy market developments in a way that benefits all energy consumers

Some stakeholders also underlined that CEER's consumer focus is important but there are additional work items that the Work Programme could include to fully address the new emerging topics such as decarbonisation, digitalisation and cybersecurity, all of which are connected to electricity and gas issues.

Several stakeholders mentioned that any regulatory developments in the field of energy should contribute to the EU objectives of decarbonisation at least cost.

For one stakeholder, the development of the concept of dynamic regulation was unclear as regulators should guarantee the stability of the regulatory and legislative frameworks and thus, must ensure the visibility and reliability for long term smart grid investments.

One stakeholder proposed to include additional focus on education and skills development in the energy transition in order to fulfil the objective of empowering consumers. Given that the risks and challenges are increasing from the consumer point of view insofar as they are active customers, and this edification will raise awareness of risks and opportunities.

1.2. Comments on the work areas of the draft CEER 2020 WP

Gas and electricity market developments

In relation to gas work items, several respondents noted that it is important to build on work previously carried out such as the Public Consultation on Regulatory Gas Challenges and the expected associated report [NB: published on 19 November 2019 as the joint [ACER-CEER Conclusions Paper](#)]¹ but that CEER should detail the way forward on this topic as more interaction is expected. A few suggestions proposed in relation to this work area included clarification of the terminology of renewable gases, the roles and responsibilities of the market actors, an emphasis on digitalisation of the gas sector and in particular the role of gas DSOs and finally, an assessment of the evolving role and dynamics of distribution at the local level.

¹ The purpose of this joint ACER-CEER Conclusions Paper is for CEER and the European Union Agency for the Cooperation of Energy Regulators (ACER) to identify priorities for legislative and regulatory action that go beyond the scope of the "Clean Energy for All Europeans" Package (CEP). In particular, the paper focuses on the gas sector, also with a view to sector coupling. In doing so, we aim to support the European Commission in relation to any future legislative initiative in this area. Regulators' priority is to improve outcomes for consumers and other gas users in both the short and longer terms, particularly in the context of decarbonisation.

Regarding power systems, several respondents noted that CEER's strategy should be reflective of the need to further develop the power system and address regulatory measures to facilitate infrastructure implementation

A couple of respondents suggested that CEER should include work on promoting innovation and research and development activities by providing more benchmarking on regulatory best practice, as well as directly promoting innovation and national best practices that encourage energy innovation.

Customers and Retail Markets

14 respondents out of 19 provided comments on the Customers and Retail Markets work items.

Four respondents particularly welcomed that this area of CEER's work remains one of the organisation's key priorities.

However, several other areas of work for CEER were proposed by respondents for this work area:

- One respondent suggested the addition of a specific item in relation to the ACER/CEER Market Monitoring Report and more specifically its Consumer Protection and Empowerment Volume;
- Another respondent suggested that regulators' monitoring should go beyond the "Road Map to 2025 Well-Functioning Retail Energy Markets" and include behavioural insights as well as energy company behaviour;
- It was proposed that regulators should monitor emerging new business models;
- Also suggested was that the impact of regulated tariffs on customers' perception and satisfaction to be added to the "Road Map...";
- Another respondent expressed the opinion that CEER should place greater focus on wholesale markets and their degree of convergence as the respondent believes retail monitoring is more a task for the national regulators; and
- One respondent proposed to study some interlinked questions about distribution system operators interacting with increasingly involved and active customers in retail markets.

New legislative/policy developments

Despite overall general support of the proposed work items within this priority area, stakeholders consistently identified a review of the existing regulatory framework and consumer benefit-focused regulatory principles as items with room for further investigation in 2020 by CEER.

More than one stakeholder asserted that any regulatory or legislative developments in the field of energy should contribute to the EU objectives of decarbonisation at least cost, security of supply and well-functioning of the market.

CEER has been encouraged by several stakeholders to look further into providing new regulatory environments for innovation for regulated businesses such as "regulatory sandboxes" alongside the provision of more benchmarking on regulatory best practice that also promotes innovation.

Most importantly, CEER's role in contributing to new legislative and policy developments to achieve decarbonisation and digitalisation goals as above will be of high value for market players.

Distribution system operation

Distribution system operation was a key priority for the majority of stakeholders and 12 out of 19 provided comments on these work items. It is also worth noting that the comments and suggestions regarding DSOs have been made in the context of the forthcoming implementation of the Clean Energy Package (CEP) and the trend of increasing decentralisation.

Several stakeholders added that in the context of the energy transition, TSO and DSO cooperation and coordination is increasingly important, particularly in the context of the growing role of DSOs.

Similar to the above priority areas, several other work items for distribution system operation for CEER were proposed by respondents including:

- The implementation of a proper communication framework among TSOs, DSOs, platforms and distributed resources;
- The relationship between electricity and gas distribution grids; and
- A report to include information system and transparency issues and account for flexibilities in planning.

Another stakeholder highlighted that there are no draft work items covering flexibility despite CEER saying it will be continuing its work on flexibility and suggested work items related to TSO-DSO cooperation in the provision of flexibility services, for example. However, it can be noted that the topic of flexibility is an ongoing deliverable for CEER, stemming from the 2019 Work Programme.

International work beyond the borders of the EU

Several respondents recognised the importance and necessity of CEER's work with international actors but in doing so, at the same time CEER should not exclude or forget the role of local authorities.

In appreciation of CEER's international work, another stakeholder highlighted the massive potential that African business and market opportunities for sustainable energy investment hold.

One stakeholder recommended that CEER delete this priority owing to the fact the public consultation did not contain any specific work item related to 'International work beyond the borders of the EU'.

1.3. Comments on individual deliverables

The table below provides an overview of the comments received to the deliverables that were presented in the public consultation on the draft CEER 2020 Work Programme in July 2019. CEER's reaction and views on this input is included in the right-hand column of the table.

	Sector and title of deliverable	Not important	Important	Very important	Further comments	CEER views
	Customers and retail markets					
1	Report on Innovative Business Models and Consumer Protection	1	6	11	<ul style="list-style-type: none"> • 9 respondents provided comments on this proposed work item • One respondent noted that it would be interesting to assess the extent to which the various models meet customer expectations and/or EU decarbonisation objectives, the impact of such business models on the whole electricity system and their profitability within the report. • Several stakeholders mentioned they would like to see the enforcement of principles for new business models to ensure both consumer protection and a level market playing field. • Another respondent suggested CEER could promote the discussion on creating proper frameworks for regulatory sandboxes • One respondent would like to see gas DSOs included in the business model assessment while another suggested the issues for P2P trading and aggregation for gas to be highlighted in addition to electricity. • Another suggestion was that the EU dimension of this task should be clarified • Finally, a stakeholder suggested this work area should be 	We will consider these observations whilst undertaking the work. The challenges which may arise for consumer rights will be especially highlighted.

	Sector and title of deliverable	Not important	Important	Very important	Further comments	CEER views
					among the priorities of energy regulators who should monitor all available offers and introduce protections where needed. They would also like to see more being done in terms of full compliance and enforcement of legislation e.g. GDPR and strengthened cooperation among regulators	
2	ACER/CEER Market Monitoring Report on Consumer Empowerment and Protection in 2019	1	8	9	<ul style="list-style-type: none"> • 9 respondents provided comments on this proposed work item. • On the whole, stakeholders credit the report and note it as a useful tool dedicated to consumer issues in the MMR given empowerment and data protection issues; there was large support to enlarge the scope of the report. • Criteria suggested by various stakeholders to input to the report include: the number of complaints; CO₂ content of energy consumption; compliance of comparison tools to the requirements set out in Article 14 of the recast Electricity Directive; a smart meter rollout update and related impacts of digitalisation for consumers; the New Deal for Consumers legislative package; more out-of-court dispute resolution data; and elaboration on consumer engagement • Another respondent highlighted that the report could elaborate on prosumers and new business models' consumer benefits and that existing legislation on consumer rights to apply also for new bundled products and services. 	CEER appreciates and welcomes the valuable feedback and comments received. We will consider these observations whilst continuing to improve and refine our monitoring work to reflect market evolution, within the ambit of our regulatory responsibilities. We also note that robust and effective monitoring takes time to develop and requires widespread uptake of the issues to be monitored as well as development of suitable reliable indicators. Indeed in 2019, we have already included some reflections on the designing of new indicators and a more in-depth analysis of consumer rights in light of the implementation phase of the Clean Energy Package.
3	CEER Monitoring Report on the Performance of	0	12	6	<ul style="list-style-type: none"> • 9 respondents provided comments on this proposed work item. • National Regulatory Authorities (NRAs) should closely 	We will consider these observations whilst undertaking the work. We will consider the effects of market interventions on retail markets in our

	Sector and title of deliverable	Not important	Important	Very important	Further comments	CEER views
	European Retail Markets in 2019				<p>monitor the evolution of households' electricity bills and whether costs of the energy transition are shared among all consumers as energy services should be affordable to all.</p> <ul style="list-style-type: none"> • Regulators' monitoring should also include behavioural insights and companies' behaviour with regard to consumer switching or opting for new services. • Regulators should also monitor new business models on the rise, opportunities for consumers to produce electricity, and the impact of smart technologies and dynamic electricity price contracts on household consumers. More attention should also be paid to consumer awareness – e.g. ACER/CEER to monitor consumer awareness with regards to new offers. • It was suggested that regulators' enforcement of consumer rights should be strengthened. • Other criteria suggested by various stakeholders similar to that also mentioned for work item 2 to input to the report include: the number of complaints; CO₂ content of the energy consumption; compliance comparison tools to the requirements set out in article 14 of the ED; a smart meter rollout update and related impacts of digitalisation for consumers; the New Deal for Consumers Package; more out-of-court dispute resolution data; and the impact of regulated tariffs on customer's perception and satisfaction. • CEER should focus more on wholesale markets and their degree of convergence within the EU, as retail market monitoring is more the tole of the national regulators. • Most stakeholders are in agreement that CEER's role on monitoring the performance of EU retail markets is very 	<p>proposed work on the Roadmap to 2025 Well-Functioning Retail Energy Markets. We also note that robust and effective monitoring takes time to develop and requires widespread uptake of the issues to be monitored as well as development of suitable reliable indicators.</p>

	Sector and title of deliverable	Not important	Important	Very important	Further comments	CEER views
					<p>important.</p> <ul style="list-style-type: none"> Stakeholders would like to see greater emphasis on consumer empowerment emerging from the CEER retail market monitoring report. 	
4	Billing - Contractual and Customer Information Following the Clean Energy Package	2	9	8	<ul style="list-style-type: none"> 9 respondents provided comments on this proposed work item. One stakeholder believed that CEER should ensure the implementation of respective provisions should not result in additional burden for market participants or confusion for customers given that the new provisions defined in the Electricity Directive define very detailed provisions on this deliverable and thus risk creating information overload for consumers Another stakeholder urges consideration of the benefits of smart metering to improve billing information as they allow the retailer to provide clearer billing information to consumers Another respondent noted their interest in looking at everything related to electronic billing (legal frameworks, advantages/disadvantages, good practices) and ways to link billing to data platforms allowing customers to check their (real-time) consumption. For the sake of customer clarity, another stakeholder was in appreciation of CEER's work on billing, holding ease and simplicity as values. A different view noted in more than one response was that bills should not be considered the only communication document between the supplier and customer and that customers should be free to choose their best suited communication channel. This was 	<p>Agree.</p> <p>The challenges set out are indeed among the issues CEER wants to address in this planned workshop, to be organised under the PEER initiative in order to allow practices and information sharing from other sectors, such as telecoms and finance.</p>

	Sector and title of deliverable	Not important	Important	Very important	Further comments	CEER views
					<p>suggested to prevent the implementation of billing and billing information provisions impeding a suppliers' ability to innovate. Conversely, overloading bills with information to increase transparency generates the opposite effect.</p> <ul style="list-style-type: none"> Finally, a stakeholder highlighted where possible for electricity bills to be freed as much as possible from unrelated policy costs, which should rather be recovered via taxation, though this is a policy issue, rather than an informational issue. 	
5	Digitalisation as a Driver for Better Retail Market Functioning	1	7	11	<ul style="list-style-type: none"> 14 respondents provided comments on this proposed work item. The position paper is to evaluate how far the market functioning and possible progress linked to digitalisation is inclusive or benefits only specific customer segments One stakeholder commented on the issue of digital illiteracy and how it has yet to be but should be tackled so that individuals are not prevented from grasping the benefits of digitalisation. Another stakeholder was in strong support of the creation of new digital services, but in doing so the interoperability between services from all stakeholders needs to be increased. One stakeholder noted this deliverable as more important for electricity than for gas. It was suggested that given smart grids will be the driving force of the transformation of the energy system caused by digitalisation, enabling their infrastructure should be placed at the centre of future EU regulatory, incentive and funding plans. 	We will consider these observations whilst undertaking the work and in considering its further developments.

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					<ul style="list-style-type: none"> • One stakeholder expressed interest in participating with this work stream, including the provision of input based on the conclusions of the Supplier Declaration workshops. • A different stakeholder would like to have the support of CEER to solve the challenges that arise in solving disputes linked to digitalisation. • A stakeholder suggested conducting an assessment of the costs and benefits of deploying smart meters for gas. Given that the conditions for such deployment are in place, it was suggested that this could empower customers and allow them to better manage their energy consumption. • The installation of smart meters being a driver for better retail market functioning is a dimension that should be included. • Specific areas noted with respect to the value proposition for customers by different stakeholders that could and should be explored further included: improving a customer's ability to understand their energy consumption and impact and to concretise how he/she can be engaged and empowered and value a service even if it is not necessarily directly but through intermediaries e.g. aggregators. • As for cost related aspects, one respondent mentioned that further value could be created through better use of the existing infrastructure e.g. the integration of market platforms at the local scale in the global system to unleashing flexibility, consumer green mindset satisfaction and the feeling of being able to impact on environmental concerns by having information about the 	

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					quality/type of energy they are consuming.	
6	CEER Workshop on Comparison Tools, New Intermediaries and Dynamic Prices	1	11	7	<ul style="list-style-type: none"> 11 respondents provided comments on this proposed work item Stakeholders suggested the following for inclusion in the workshop: examination of the technical and market challenges of comparison tools with respect to dynamic price contracts; aggregators' offers and bundled offers; discussions on how to compare dynamic price contracts (timely access of current usage data inclusive); the provision of information on potential risks and benefits of new products/offers so that customers can make an informed choice; to address questions surrounding the activity of the comparison tools in order to assess if they meet the requirements in Article 14 of the Electricity Directive; discussions of smart meters, smart grids and rules on data exchange compliant with GDPR; the involvement of external parties into the PEER initiative; an assessment of the idea of dynamic pricing in gas given the impact on balancing that the decentralisation of energy production might have; and to look at intermediaries and digital platforms in the provision of flexibility. One respondent proposed CEER and NRAs could enhance the data management hubs already operating in some European countries given the rise of new tools to counteract the so-called energy tourism of end customers, evaluating the possibility to implement the "supplier objection" in cases of confirmed and significant arrears of the customer or the consultation of databases to provide information on the "solvency" of end 	<p>Agree. Data on consumption and consumer behaviour are indeed crucial. Customer information should provide more insights and empower the consumer to participate actively and consciously in the electricity market. This not only includes using electricity rationally and switching suppliers/contracts, but will also shift into efficient use of the grid, tap into the potential of flexibility and aggregation services, use home automation systems including production and storage devices, using electric vehicles, etc. The future challenges for comparison tools are plentiful. A balance will have to be struck between the amount of information and user-friendliness. We have to realise that comparison tools will not solve all the challenges the energy sector is facing, but we need to reap their potential to the fullest.</p> <p>Agreed that comparison tools should include gas offers in their information. In the gas sector, new challenges are created by the rising importance of gases from renewable sources, such as biomethane. CEER will look into the possibility to include such developments</p>

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					<p>customers.</p> <ul style="list-style-type: none"> • Another stakeholder noted the main driver for customers to participate in the markets to be discussed by this work item would be the economic benefits despite environmental concerns of energy efficiency and/or contribution to a sustainable energy system • A further suggestion was that CEER might want to consider ways to remove regulatory barriers concerning dynamic pricing e.g. via freeing grid tariffs from unrelated costs to reduce distortion of production, consumption and investment decisions. 	<p>into the workshop.</p> <p>The implications of digitalisation on consumers is an important aspect to consider (as is cross-sectorial cooperation) and among the reasons this workshop is under the PEER initiative. Moreover, the role of comparison tools cannot be seen separately from the rights of energy customers.</p>
7	Delivering the CEER-BEUC 2020 Vision for Europe's Energy Customers	2	8	9	<ul style="list-style-type: none"> • The 9 stakeholders that provided comments on this work item said they look forward to contributing to the discussions on a vision for Europe's energy consumers given they are strong supporters of the CEER/BEUC 2020 Vision for Europe's Energy Customers and its four RASP principles • Stakeholders would like to see customer rights and obligations ensured and enforced via raising awareness of risks and opportunities. • One stakeholder noted there should be more focus placed on the effective application of the affordability principle. • The benefits of smart meters for consumers should follow the RASP principles. • Another respondent expressed high importance on addressing energy poverty going forward to ensure that digitalisation and decarbonisation trends in the energy transition go together with further democratisation whilst ensuring access to energy to all customers so that 	<p>In 2020, CEER plans to launch a renewed reflection on delivering the principles in the Vision and will organise an event to assess the principles agreed in 2012 and whether they should be reviewed in the light of the energy transition and major changes occurring (and expected) in the energy sector.</p> <p>We will consider these observations whilst undertaking the work and welcome any valuable contribution from stakeholders.</p>

	Sector and title of deliverable	Not important	Important	Very important	Further comments	CEER views
					nobody gets left behind.	
8	CEER Annual Customer Conference	1	11	7	<ul style="list-style-type: none"> 4 respondents commented on this proposed work item of which 3 mentioned they would be keen to give input towards the topics of the conference. One stakeholder would like to see more of a focus on gas markets in the conference in line with the upcoming gas package. 	Inputs and contributions to the annual Customer Conference are welcome. We will consider these observations whilst preparing the Conference.
	Electricity					
9	Regulatory Frameworks Report of European Energy Networks	1	7	10	<ul style="list-style-type: none"> 7 respondents provided comments on this proposed work item One stakeholder would like gas networks to be included in the 2020 report and stated that it was not clear why this work item is only included under the electricity-only section A suggestion for CEER to consider in its evaluation the necessity to re-think tariff setting for each Member State in order to strike the correct balance between the following objectives: ensuring economic and financial equilibrium of DSOs; fair allocation of network and policy costs among customers while avoiding artificially incentivising grid defection; establishing a level playing field among different energy carriers; supporting electrification of other sectors, namely transportation, heating and cooling; and not hampering efficient consumption behaviours. Additional provisions stakeholders suggested for the report were: <ul style="list-style-type: none"> A benchmark of the missions granted to DSOs with respect to the objectives of energy efficiency 	<p>The Regulatory Frameworks Report of European Energy Networks already covers both the electricity and the gas sector and is in fact a joint deliverable for the Gas and Electricity Working Groups.</p> <p>Regarding the proposal to re-think the tariff setting, the Distribution Systems Working Group is already focusing on distribution tariffs with the aim to publish a paper in 2020.</p> <p>Generally speaking, the Regulatory Frameworks Reports are meant to report about the regulatory situation as it is. The reports are not meant to propose new policy, although they could be used for that purpose as a reference source.</p>

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					<p>and decarbonisation usages;</p> <ul style="list-style-type: none"> - To address regulatory sandboxes; and - An adjustment of incentive structures from CAPEX to a TOTEX-based approach given the transformation towards flexibility markets. - For investment conditions to look further into recommendations to foster the ability to finance upcoming investments and the development of regulatory regimes that enable TSOs to finance the steep rise in capital expenditures while also providing regulatory certainty and visibility on an appropriate rate of return in order to foster private investments to flow into R&D projects. 	
10	Biennial RES Status Review of Renewable Support Schemes in Europe	2	13	3	<ul style="list-style-type: none"> • 4 respondents provided comments on this proposed work item • One respondent suggested the report could be enriched by an analysis of RES development from the perspective of avoided CO₂ emissions costs. • Another suggested the review of renewable support schemes in Europe should not just be for electricity but a transversal effort i.e. to include information on support schemes for renewable and decarbonised gas. • CEER should consider the contribution to reach EU decarbonisation and RES targets when designing efficient schemes for self-consumption and RES development. • One stakeholder was in the opinion that it would be timely to assess where different MS stand post-adoption of the 2009 Renewables Directive i.e. the evolution of the level of support and difference between MS and technologies. 	<p>As it concerns a status review, CEER is not trying to rate support systems or highlight advantages or disadvantages.</p> <p>To include avoided CO₂ emissions costs might be desirable, however this is difficult to achieve and may go beyond the scope of the status review. To determine to what to compare emissions costs, it will not be feasible to compute an electricity production baseline CO₂ output for each country and conclude avoided CO₂ emissions by the supported electricity. There might be some national calculations in place. It may be possible to compare it to an average production-mix or something like it.</p>

	Sector and title of deliverable	Not important	Important	Very important	Further comments	CEER views
					This stakeholder further suggested with respect to renewable gases there should be greater clarity in terms of the terminology and the potential of these gases. Further still, the support schemes should be allocated to the development of competitive carbon-neutral industrial solutions and power-to-gas technologies, such as green hydrogen and synthetic methane generation to accelerate the transition in hard-to-abate sectors.	CEER will look into the option to add a section regarding renewable and decarbonised gas. Self-consumption is already part of the status review. As mentioned before or self-consumption and “the allocation to the development of competitive carbon-neutral industrial solutions and power-to-gas technologies” the deliverable concerns a status review and not a “best-practice-paper”.
	Gas					
11	Gas Distribution Access and Tariffs	0	10	8	<ul style="list-style-type: none"> • 9 respondents provided comments on this proposed work item. • 3 respondents highlighted that network tariffs should be cost-reflective in order to provide the right economic price signals but may not be the best vehicle to encourage the development of renewable gases. • The scope of the work should be broadened to transmission grids as tackling such an issue separately may raise inconsistencies. Gas transmission tariffs should be studied in order to see the welfare and market integration effect that lowering or eliminating tariffs intra-EU could have. • One respondent suggested the innovative focus (and the regulatory framework update) should be on green gases and hydrogen using the existing infrastructure. • 2 respondents suggested that renewable, synthetic 	<p>CEER agrees on the importance of the tariffs to be cost-reflective. In addition, CEER considers it is important to ensure that the energy transition is based on sound economic principles and leads to the selection of the best-value technologies for decarbonisation. It is indeed important to promote competition between alternatives to encourage the development of renewable gases.</p> <p>CEER appreciates the suggestion to broaden the work to transmission grids and will consider to accommodate it on further work.</p> <p>CEER takes good note on the suggestion</p>

	Sector and title of deliverable	Not important	Important	Very important	Further comments	CEER views
					gases and biomethane should be put on the equivalent footing as natural gas.	<p>to also focus on green gases and hydrogen using the existing infrastructure. In addition, CEER notes that care must be taken so that new investments in natural gas networks are consistent with future decarbonisation. In view of sector integration, this is an issue of the great relevance.</p> <p>Regarding renewable, synthetic gases and biomethane, CEER is of the opinion that such assets could be developed in a competitive market.</p>
12	Regulatory Innovations for Electricity and Gas Sectors Coupling	0	7	12	<ul style="list-style-type: none"> • 12 respondents provided comments on this proposed work item. • 2 respondents strongly recommend to thoroughly analyse the impact of sector coupling on consumers to avoid an extra financial burden via consumers' bills. • 4 respondents mentioned that sector coupling should be extended from gas and electricity to heating/cooling and mobility. • 3 respondents had an impression that CEER seems to narrow its work to power-to-gas only rather than to use a whole system approach. There are many question marks about sector coupling (maturity of business models, sustainability, need for subsidies, infrastructure investments, the role and efficiency of different technologies). • One respondent believes that sector coupling is of major interest for EU and should therefore be granted more 	<p>Innovation is at the heart of the current developments, in terms of technology built also regarding network management and regulation. Decarbonisation will have a cost but CEER considers consumers protection of the utmost relevance. Based on that, CEER will consider the commented proposal in its future work, particularly with a view to ensuring innovation is carried out in a cost-efficient way.</p> <p>CEER does not reduce sector coupling to power-to-gas, but even acknowledges the extension from gas and electricity to heating/cooling, making the concept of sector integration also relevant, even if CEER will consider it in other work.</p>

	Sector and title of deliverable	Not important	Important	Very important	Further comments	CEER views
					<p>priority in the Work Programme.</p> <ul style="list-style-type: none"> • One respondent suggested to work on further coordination and joint planning between gas and electricity network operators in order to find the most cost-efficient investments to deliver the energy transition and ensure a resilient, robust and secure energy system. • One respondent proposed that when tackling the sector coupling issue, it is essential to keep in mind that long-term considerations (in this case carbon neutrality) should prevail over other short-term considerations. • One respondent proposed to reflect on elements such as power-to-gas plants, injection in the gas system, the storage and further use of hydrogen and for CEER to elaborate views about recommendations and next steps in this field. • Another respondent mentioned that consistent certification of products that do not emit greenhouse gas emissions during their production across sectors is needed in order to avoid market distortions and gain customer trust. • One responded noted that sector coupling requires digitalisation to connect across two largely disconnected energy sectors at present. Sector coupling represents an extra flexibility option enabling the possibility of electric load shifting, energy transformations, unleashing the potential of storage, maximising the RES integration and increasing the efficiency in the energy system through optimised planning. 	<p>To address sector coupling issues, CEER considers that a review of market rules across gas and electricity should take place, as they affect power-to-gas assets, to ensure no undue distortions. CEER considers sector coupling is a topic that will be further discussed and analysed within the EU and for that reason agrees with the respondents on the need to further develop work on the subject to understand its dimension and implications. CEER considers that a coherent approach across multiple sectors is essential to identify needs and to plan infrastructure. CEER is aware of the prevalence of long-term considerations over short-term ones.</p> <p>CEER appreciates the suggestions provided on the need to reflect on certain elements, such as power-to-gas plants and will consider it when developing the present deliverable.</p> <p>On the last two bullets, CEER welcomes the comments received and express its agreement on the views expressed.</p>

	Sector and title of deliverable	Not important	Important	Very important	Further comments	CEER views
13	Future Role of LNG in Europe	0	13	3	<ul style="list-style-type: none"> • 6 respondents provided comments on this proposed work item. • 2 respondents suggested to engage more with consumer organisations in this debate. • One respondent expressed the view that network tariffs and access are designed in a way to address the issue of EU LNG buyers competing with Asian LNG buyers. • One respondent mentioned that CEER's work on LNG should be focused on access regimes to LNG regasification terminals and on regasification tariffs applied to each LNG terminal in Europe. 	<p>CEER takes good note on the comments received. As this deliverable will take the form of a workshop, CEER will take the suggestion of engaging more with consumers organisations and will invite them to attend the event. It notes, however, that impacts on consumers are relatively indirect as LNG terminals are at the level of wholesale markets.</p> <p>On the other suggestions presented, CEER will consider the proposals in its future work.</p>
	Distribution systems					
14	Network Planning/ Coordination	0	7	12	<ul style="list-style-type: none"> • 12 respondents provided comments on this proposed work item. • 7 respondents mentioned that DSOs' involvement in the network plans development should be greater alongside strong coordination between DSOs and TSOs in this matter. • One respondent suggested that the relationship between gas transmission and distribution grids should be considered and accounted for the new flow patterns. • One respondent proposed to include information system and transparency issues. 	<p>This item indeed could have a strong emphasis how DSOs develop their network plans - following the Clean Energy Package, where the DSOs are becoming more important. In addition, it could look into the required coordination between DSOs and TSOs in creating the network plans, as their grid development influences each other.</p>

	Sector and title of deliverable	Not important	Important	Very important	Further comments	CEER views
					<ul style="list-style-type: none"> One respondent mentioned that a proper communication framework among TSOs, DSOs, platform and distributed resources has to be put in place. 	
15	Data Management and Smart Metering	1	7	10	<ul style="list-style-type: none"> 11 respondents provided comments on this proposed work item. 2 respondents believed that this work item would be better placed under Customers and Retail Markets. One respondent would value a benchmarking of smart meter roll-out in addition to the benefits of digitalisation for consumers in countries where smart meters have been rolled-out compared to those where they have not. One respondent suggested to tackle the topic in a way that it takes into account the impact on the overall regulatory framework, looking both to retail and grid perspective. A cross-sectoral coordination regarding the issues of data management should also be favoured. One respondent requested more clarification on this item and the issues to be looked at. One respondent suggested to incorporate the benefits of smart meters for consumers and the gas value chain. 	CEER concludes that stakeholders find this deliverable in general (very) important and will take on board the suggestion to combine it with other deliverables (i.e. the CRM WG suggested item on 'Report on innovative business models and consumer protection'). In any case, CEER seeks cooperation between the working groups operating within CEER.
	Cross-sectorial					
16	Monitoring Technological Trends in Energy Trading	3	10	3	<ul style="list-style-type: none"> 6 respondents provided comments on this proposed work item. One respondent mentioned to be aware of the MiFID II 	Agree.

	Sector and title of deliverable	Not important	Important	Very important	Further comments	CEER views
					<p>regulation and avoid any overlapping or conflicting obligations.</p> <ul style="list-style-type: none"> • One respondent proposed to consider studies on the negative effects of high frequency trading in the financial sector and to learn from these studies to avoid the same mistakes. 	We will also look at Algo-trading whilst undertaking the work.
17	Report - Safeguarding the Independence of Regulators	0	8	10	<ul style="list-style-type: none"> • 6 respondents provided comments on this proposed work item. • 5 respondents recognised the need of independent regulators and welcomed such work. • One respondent mentioned CEER having a conflict of interest and the possibility of lacking the credibility in its analysis and conclusions. • 2 respondents stressed that active cooperation among relevant authorities across sectors will be essential and that this requires better coordination and information sharing among NRAs, consumer authorities and other relevant authorities especially where such cross-cutting issues arise. 	CEER agrees with the need for independent regulators and cooperation amongst relevant authorities.

2. Conclusions

CEER appreciates and welcomes the valuable feedback and comments received on CEER's draft 2020 Work Programme.

Generally, respondents showed strong support of the four main proposed areas of principal relevance for CEER's Work Programme in 2020. Stakeholders were also in agreement that the 2020 Work Programme will be shaped by the implementation of the CEP and our own 3D Strategy.

Our views on the specific comments received on the CEER draft 2020 Work Programme are reflected in the table above, but overall, stakeholders strongly supported that the deliverables that we have proposed appropriately address CEER's proposed work areas albeit there are a few suggestions for additional provisions which have been noted in the table above.

CEER's focus on the consumer and retail markets is broadly supported. Generally, stakeholders underlined the importance of the deliverables regarding the upcoming implementation and transposition of the Clean Energy Package for all Europeans in 2020.

Respondents expressed their strong support of CEER's work on gas, where stakeholders mainly acknowledged the necessity of focusing on the innovation within the gas sector as well as electricity and gas sectors' coupling, which is highly prioritised in the 2020 Work Programme.

Regarding electricity proposed deliverables, respondents considered them as being important for the further development of the electricity markets, as well as gas markets, since The Regulatory Framework Report of European Energy Networks covers both – electricity and gas sectors.

On CEER's cross-sectorial work, stakeholders emphasise to take into consideration regulation on the financial sector and learn from the trading experiences within financial sector on high frequency trading.

The comments received in response to this consultation will be reflected in the development of the details of the 2020 Work Programme and, where appropriate, in later Work Programmes from 2021 and onwards and in the continuous development of CEER's 3D Strategy.

In the event of unpredictable developments, CEER will make any necessary changes to the proposed Work Programme 2020.

Annex 1 – About CEER

The Council of European Energy Regulators (CEER) is the voice of Europe's national regulators of electricity and gas at EU and international level. CEER's members and observers (from 39 European countries) are the statutory bodies responsible for energy regulation at national level.

One of CEER's key objectives is to facilitate the creation of a single, competitive, efficient and sustainable EU internal energy market that works in the public interest. CEER actively promotes an investment-friendly and harmonised regulatory environment, and consistent application of existing EU legislation. Moreover, CEER champions consumer issues in our belief that a competitive and secure EU single energy market is not a goal in itself but should deliver benefits for energy consumers.

CEER, based in Brussels, deals with a broad range of energy issues including retail markets and consumers; distribution networks; smart grids; flexibility; sustainability; and international cooperation. European energy regulators are committed to a holistic approach to energy regulation in Europe. Through CEER, NRAs cooperate and develop common position papers, advice and forward-thinking recommendations to improve the electricity and gas markets for the benefit of consumers and businesses.

The work of CEER is structured with a number of working groups and work streams, composed of staff members of the national energy regulatory authorities, and supported by the CEER Secretariat. This report was prepared by the CEER Work Programme Drafting Committee.

More information at www.ceer.eu.

Annex 2 – List of Respondents

Organisation
BEUC, The European Consumer Organisation
CEDEC
EDF and EDISON
ELINORR
ENAGAS S.A.
ENEDIS
ENEL SpA
ESADE Law School (Ramon Llull University)
EURELECTRIC
EUROGAS
FARADAY GRID
GD4S
GEODE
INNOGY Gas Storage
KEPKA – Consumers' Organisation (Greece)
MHB-Wise Consultant Services