



Fostering energy markets, empowering **consumers**.

CEER 2022 Work Programme

Public consultation document

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INFORMATION PAGE

Abstract

CEER is looking for feedback on the proposed items of its 2022 Work Programme. The development of CEER's annual work programme is guided overall by the CEER "Empowering Consumers for the Energy Transition" Strategy which will be for the period 2022-2025.

Target audience

Energy suppliers, traders, electricity and gas customers, electricity and gas industry, consumer representative groups, network operators, Member States, academics and all other interested parties.

How to respond to this consultation

Deadline: **9 August 2021**

This public consultation is carried out through a dedicated **online questionnaire** on the European energy regulators' website. No login is required.

If you have any queries relating to this consultation paper or the online consultation, please contact:

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All responses except confidential material will be published on the website www.ceer.eu

Treatment of confidential responses

In the interest of transparency, Council of European Energy Regulators (CEER):

- i. will list the names of all respondents or, alternatively, make public the number (but not the names) of entirely confidential responses received;
- ii. request that any respondent requesting confidentiality submit those confidential aspects of their response by marking them as "confidential" in the online questionnaire. CEER will publish all parts of responses that are not marked confidential.

This CEER public consultation is carried out in line with the [Guidelines on CEER's Public Consultation Practices](#).

Table of Contents

FOREWORD	4
1 INTRODUCTION.....	5
1.1 The six core areas of CEER’s Empowerment Strategy	5
1.2 Public consultation and further process	5
2 CEER’S PRIORITIES IN 2022.....	7
2.1 Consumer-centric design	7
2.2 Sustainable and efficient infrastructure	7
2.3 Well-functioning markets	7
2.4 Energy system integration	7
2.5 Flexibility.....	8
2.6 Decentralised and local energy.....	8
2.7 Significant recurring work	8
3 QUESTIONS FOR CONSULTATION.....	10
4 DRAFT CEER WORK ITEMS FOR 2022	11
5 NEXT STEPS.....	17
Annex 1 – About CEER.....	18

FOREWORD

This consultation paper provides the Council of European Energy Regulators (CEER)'s proposed 2022 Work Programme work items, for public comment.

Current CEER strategy

From 2019, the key drivers of our work were the so-called “3Ds” (special focus years in brackets) – Digitalisation in the consumer interest (2019), Decarbonisation at least cost (2020) and Dynamic regulation (2021) – based on our CEER's 3D Strategy and also the implementation of the “Clean Energy for All Europeans” package (CEP). This year is the last year of our current strategy, therefore, in considering the 2022 Work Programme we looked at new pillars to focus our work in this transformative time.

New CEER Strategy

In the context of the recent pandemic situation with consequences impacting all areas of our life along with the reality of climate change, as well as other environmental issues, the importance of enabling an unprecedented transformation of how energy is produced, transported and used is a key concern for energy regulators. Europe has set goals to make the transition to a sustainable society and economy and strives to be the first climate-neutral continent. With that in mind, European energy regulators recognise the resulting challenges for regulation. Therefore, with a view to promoting the energy transition and contributing to a carbon-neutral society and economy, CEER is committed to “**empowering consumers for the energy transition**”, by:

- Enabling energy system integration: integrating renewables and incentivising innovation;
- Placing consumers at the centre of energy markets with consumer-centric dynamic regulation, empowering consumers to actively contribute to and benefit from a flexible energy system; and
- Ensuring open, well-functioning and resilient markets nationally and in Europe: delivering flexibility and new business models.

In April 2021, CEER consulted stakeholders on the draft version of the Energy Transition Strategy 2022-2025, which we finalised and published on 10 June 2021. Thus, the Work Programme work items were developed based on this new strategy, keeping in mind that there is important recurring work. All work will contribute to implementing six core areas as explained in the [Strategy document](#) and to achieving our strategic aims in general. Hence, in giving feedback on the draft 2022 Work Programme, we ask that you consider it in the context of CEER's new strategy.

In this paper, we seek your views on the proposed work items for 2022. We value your feedback in this exciting period ahead.

Annegret Groebel
CEER President

1 INTRODUCTION

Each year, CEER prepares a work programme which seeks to meet the challenges posed by energy market developments. It is important that CEER identify topics which enhance regulation with the aim of improving the operation of energy markets to the benefit of consumers. Our 2022 Work Programme is shaped by the new CEER “Empowering Consumers for the Energy Transition” (Energy Transition) Strategy, which goes into effect next year.

Based on the new Energy Transition Strategy, CEER’s work programmes for the period 2022-2025 will prioritise activities that contribute to implementing six core areas (below) derived from the strategic statement and achieving our strategic aims more generally. That is to say, CEER deliverables and activities should contribute, directly or indirectly, to outcomes that further these goals. In the following chapters the elements of the new Strategy are described in more detail. The logic of the Strategy is highlighted in a two-part diagram found in the Strategy document. The complete strategy document can be found [here](#).

1.1 The six core areas of CEER’s Empowerment Strategy

CEER has adopted a forward-looking consumer-centric “Empowering consumers for the energy transition” Strategy for the period 2022-2025. The six core areas of CEER’s Empowering Strategy are:

- Consumer-centric design;
- Sustainable and efficient infrastructure;
- Well-functioning markets;
- Energy system integration;
- Flexibility;
- Decentralised and local energy.

The six core areas are the main drivers of our proposed 2022 Work Programme work items and provide the rationale for most of our work. This draft 2022 Work Programme clearly identifies the core areas to which each deliverable contributes (see the work items listed below). Many of work items contribute to more than one core area.

Alongside the work driven by the strategy, a significant part of CEER’s work remains every year. This is the monitoring and benchmarking work realised with other partner organisations such as the EU Agency for the Cooperation of Energy Regulators (ACER) or the Energy Community Regulatory Board. There is also work in the international area or other events and initiatives such as PEER. The recurring work for 2022 is explained more in details under the heading 2.7.

1.2 Public consultation and further process

Regulators, working through CEER, focus on a number of key areas which are important to advancing energy markets and improving their effective operation to the benefit of consumers.

CEER sees stakeholder consultation as important both in setting our priorities for the year ahead and in the subsequent development of our work in 2022. All interested parties are therefore invited to participate in this consultation and **submit comments by 9 August 2021**.

Stakeholders are invited to participate in the public consultation via a dedicated online questionnaire on the [public consultation page](#) of the CEER website. Please note that only answers submitted via the online questionnaire will be taken into consideration. No special registration or password is needed to access the online questionnaire.

2 CEER'S PRIORITIES IN 2022

Like other organisations, CEER must prioritise its work so that scarce resources can be used most effectively. CEER's Strategy provide the overall framework for our work for the period 2022-2025.

CEER priorities in 2022 are:

- Consumer-centric design;
- Sustainable and efficient infrastructure;
- Well-functioning markets;
- Energy system integration;
- Flexibility;
- Decentralised and local energy;
- Significant recurring work.

2.1 Consumer-centric design

For consumers, green transition policies should help reduce their carbon footprint, improve energy efficiency, especially in buildings, and speed up the transformation of energy markets by enabling the take-up of new technologies, sustainable energy carriers and new business models. At the same time, consumers stand to benefit from greater flexibility and digitalisation. This will contribute to a decarbonisation at least cost and help the energy system to cope with a much higher degree of electrification and increased production of electricity from renewable sources.

2.2 Sustainable and efficient infrastructure

This expanded view of the energy system naturally brings with it major challenges for existing and future infrastructure decisions. The current roles and responsibilities have to be reviewed. An effective regulatory framework at EU level is needed to ensure a level playing field for new solutions whilst removing barriers to entry.

2.3 Well-functioning markets

We are currently facing an evolution of the energy markets without precedent. We are moving towards a more-integrated and at the same time, more-decentralised market(s), with the entry onto the scene of various actors whose roles are still to be defined. In fact, whilst maintaining the pressure to integrate the markets at a European level, there is a concurrent greater participation of distributed energy resources managed by aggregators, contributing to an increasing use of the flexibility available at the local level.

2.4 Energy system integration

An integrated energy system is one which takes into account the adequacy of all the available resources for a secure supply – irrespective of the future energy mix – and manages supply and demand in the most cost-effective manner. The development of new technologies, such as renewable and low-carbon gases, drives the emergence of new market trends and solutions. By way of example, we note the possibility for a single facility to use waste to produce electricity, (decarbonised) heating and clean gases, illustrating the potential of

optimising previously separate processes and energy carriers.

2.5 Flexibility

Following the Clean Energy Package, we need to organise electricity markets in a more flexible manner and to fully integrate all market players in decentralised markets – including producers of renewable energy and providers of new energy services, energy storage and flexible demand. This also requires the modernisation of distribution networks and their development into smart grids in order to enable decentralised generation and energy efficiency. This then calls for increased digitalisation. This requires ensuring adequate protection against cybersecurity risks by implementing suitable rules. As well, this means specific measures for setting up simplified and streamlined authorisation procedures for small decentralised and/or distributed generation. Finally, this implies market-based incentives to unlock the market for demand-response.

2.6 Decentralised and local energy

In order to be effective, the energy transition needs to include consumers themselves in the process. It must recognise and respect consumer needs and choices, guaranteeing their rights and supporting the most vulnerable. At the same time, it must provide consumers with the necessary tools and framework for them to participate in efforts to achieve a sustainable and carbon-neutral society.

2.7 Significant recurring work

Some of our work is recurring precisely because there is a high public interest in it and/or it is appreciated by our member NRAs. Customers are at the very core of CEER's Strategy, but always a focus of CEER, therefore consumer issues are enshrined in the 2022 Work Programme. CEER will also organise its annual Customer Conference in 2022.

CEER will continue its international relations with regulators across Europe and the world:

- CEER will continue to work with the European Bank for Reconstruction and Development (EBRD) to bring the expertise in CEER beyond CEER's member NRAs;
- CEER will continue the work started this year with the [EU4Energy project](#), which brings regulatory expertise and capacity building to Eastern Partnership countries.

CEER has consistently undertaken work on a number of important areas. Our Partnership for the Enforcement of European Rights (PEER) initiative encourages collaboration with regulators from other sectors and bodies with consumer responsibilities on topics of mutual interest. CEER hopes to continue this valuable work in 2022, building stronger ties with other European regulatory bodies in disciplines related to energy regulation, including financial regulation, competition authorities and telecommunications regulation.

Apart from other, a number of significant recurring reports are to be prepared during 2022:

- CEER will cooperate with ACER to deliver a comprehensive monitoring report on the development of Europe's wholesale and retail markets in electricity and natural gas. Monitoring consumer empowerment and retail markets developments are core tasks of regulatory authorities across Europe and of ACER, and CEER contributes particularly in these areas. This joint ACER-CEER Market Monitoring Report is a key reference work for the European Commission, EU agencies and other policymakers and will continue to be an important part of CEER and ACER's work in 2022;

- CEER will continue to periodically measure Transmission System Operators' (TSO) cost efficiency to ensure that tariffs are based on efficient cost as stipulated by European law. The upcoming TSO Cost Efficiency Benchmark 2021 (TCB21) will be the sixth edition for electricity and the third for gas;
- CEER will work on the annual report on regulatory frameworks of European energy networks, which surveys implemented regulatory regimes;
- Self-Assessment Status Report 2022 for the Roadmap to 2025 Well-Functioning Retail Energy Markets;
- 3rd CEER Report on Power Losses; and
- 3rd CEER Report on Tendering Procedures for RES in Europe.

3 QUESTIONS FOR CONSULTATION

The purpose of this public consultation is to increase transparency and to provide energy regulators with valuable feedback from those parties interested in shaping regulators' priorities. The present document will be open for public consultation **until 9 August 2021**.

We would, in particular, be interested in views on the following **questions for public consultation**:

- CEER proposes that the 2022 Work Programme should focus on the above-mentioned six priority areas from the 2022-2025 CEER Strategy. Whilst the areas themselves were consulted upon in the draft strategy public consultation, do you support how these areas flow into the draft 2022 Work Programme?
- Within each priority area, do you think the Work Programme focuses on the right deliverables or should some be deleted or added? [Please note that not every aspect in each of the six core areas would be addressed in a single year's work programme.]
- On the individual work items (listed in section 4 of the consultation paper, see below) do you have any specific comments?

Stakeholders are invited to participate in the public consultation via a dedicated [online questionnaire](#) on the CEER website.

4 DRAFT CEER WORK ITEMS FOR 2022

No	Sector	Title	Description/output	Outcome	Strategy area	Expected start time	Expected end time
1	Consumers and retail markets	Guidelines of Good Practice (GGPs) on future-proof energy bills	These GGPs will consider latest market developments and business models and their implications for billing and billing information (e.g. dynamic contracts, smart technologies, aggregation, bundled products).	The impact of this guidance on future-proof billing will be to promote consumer-friendly market development and enhance the engagement of consumers. These GGPs will help market stakeholders and NRAs to realise the aims of the European market integration. The GGP aim to provide guidance to NRAs and stakeholders on the future-proof design of energy bills in a consumer-friendly and trustworthy way.	Consumer-centric design; Well-functioning markets	Q1 2022	Q4 2022
2	Consumers and retail markets	Guidelines of Good Practice (GGPs) on trustworthy green offers	In a context of decarbonisation and increased awareness of sustainable and renewable energy consumption, the GGP will provide recommendations on promoting trustworthy information and communication of green offers.	Within a digital society, "trust" in information is one of the main issues for stakeholders to be successful and reliable. Consumer trust in information (from market participants) is crucial for the acceptance of and participation in the energy transition. Therefore, ensuring trustworthy information on green offers is a fundamental issue. The impact of these GGPs will be to support stakeholders and NRAs to increase and promote the acceptance and willingness of consumers to actively participate in the green transition.	Consumer-centric design; Well-functioning markets	Q1 2022	Q4 2022
3	Consumers and retail markets	Workshop series on consumer engagement with and access to markets	CEER will hold a series of workshops linked to the issue of consumer engagement and access to markets. The debates will seek to identify opportunities and challenges for consumer engagement and ease of access to markets in the context of the energy transition and market changes (e.g. billing, green offers, new business models, etc.).	The workshops will raise awareness and foster mutual understanding of and sensitivity to the issues consumers face. They will enable market stakeholders to discuss issues which are relevant for a stronger market participation of consumers to ensure the success of the energy transition.	Consumer-centric design; Well-functioning markets; Decentralised and local energy	Q1 2022	Q2 2022
4	Consumers and retail markets	ACER/CEER annual market monitoring report – energy retail and consumer protection volume	One of the annual ACER/CEER Market Monitoring Report's three volumes will monitor consumer protection and empowerment and retail market developments across Europe. CEER will cooperate with ACER to deliver a comprehensive monitoring report to the European Parliament, investigating progress on the national implementation of European legislation on consumer protection and empowerment and consumer experience in European energy markets. The report will include deep insights into retail market developments, including prices, price regulations and market structures, and standing and new consumer issues such as energy poverty and active energy consumption. The primary data source for CEER inputs are CEER's national indicators and respective NRA surveys. Beyond presenting the key results of our assessment of the functioning of the Internal Energy Market (IEM) in 2021, the MMR also contains recommendations on how to address the remaining identified barriers to the completion of the IEM.	Monitoring consumer empowerment and retail market developments are core tasks of regulatory authorities across Europe and ACER. This joint monitoring report is an established CEER activity and a key reference work for the European Commission, EU Agencies and other policy makers. Robust monitoring, analysis and evidence-based findings are core tools for regulatory action.	Consumer-centric design; Well-functioning markets	Q4 2021	Q4 2022

No	Sector	Title	Description/output	Outcome	Strategy area	Expected start time	Expected end time
5	Consumers and retail markets	Self-Assessment Status Report 2022 for the Roadmap to 2025 Well-Functioning Retail Energy Markets	<p>This fourth Status Report continues to implement the framework developed by CEER in its 2018 "Roadmap to 2025 well-functioning retail energy markets" in Europe that aims to deliver reliable, affordable and simple-to-use services to protect and empower consumers by 2025. The process of self-assessment can be described as a journey that starts with data collecting, continues with a self-assessment together with a gap analysis, which can lead to national recommendations and monitoring of the implementation of those recommendations.</p> <p>CEER's Roadmap to well-functioning retail energy markets in Europe is part of CEER's pledge to realise the core principles in the CEER-BEUC 2020 Vision (since updated to 2030) and the objectives set out in the ACER's Bridge to 2025: Conclusions Paper. Also, CEER's views on putting consumers at the heart of the market complement well the areas for action and further improvement identified by the European Commission's "New Deal for Energy Consumers" and, subsequently, in recent electricity market design legislation.</p>	<p>By identifying any gaps between the national data for a metric and any existing national objective for that metric, each NRA can target improvements and seek ways to achieve those improvements to the benefit of the performance of national retail markets.</p> <p>It should be clear that this work is not intended simply as an exercise in market monitoring: it seeks to present a forward-looking framework to understanding and assessing national retail markets.</p> <p>CEER recommends that a self-assessment and gap analysis to be repeated annually. In conclusion, the main objectives of the 2022 Status Report will be to summarise the second round of self-assessments, to continue showing progress in the work towards well-functioning retail markets and sharing experiences and data between NRAs and other stakeholders.</p>	Well-functioning markets; Consumer-centric design	Q1 2022	Q4 2022
6	Consumers and retail markets	Review of the metrics in CEER's 2017 Handbook for National Energy Regulators in the light of the CEP implementation	<p>CEER acknowledges the fact that the 2017 Handbook for National Energy Regulators and its metrics are dynamic by nature since legislation evolves as well as national circumstances. This means that CEER will look into reviewing the metrics periodically and propose update or change metrics and/or definitions when necessary. In particular, CEER will verify whether the metrics have to be adjusted or complemented with additional metrics taking into account that most of the acts under the Clean Energy for All Europeans Package entered into force on 1 January 2021.</p>	<p>In 2015, CEER committed to prepare a roadmap to well-functioning retail energy markets in Europe that deliver reliable, affordable and simple-to-use services to protect and empower consumers by the year 2025. This work is part of both CEER's pledge to realise the core principles in the CEER-BEUC 2020 Vision for Europe's energy customers and the objectives set out in the ACER's Bridge to 2025: Conclusions Paper. Also, CEER's views on putting consumers at the heart of the market complement well the areas for action and further improvement identified by the European Commission's "New Deal for Energy Consumers" and, subsequently, in the new electricity market design legislation. It should be clear that this work is not intended simply as an exercise in market monitoring: it seeks to present a forward-looking framework to understanding and assessing national retail markets. As a first step in developing the Roadmap, common metrics for NRAs to self-assess the functioning of their national retail markets had to be established, while also taking into account the specificities of every member state and the development of the retail market. Those metrics are illustrated in CEER 2017 Handbook for National Energy Regulators.</p> <p>As a second step, CEER developed the "Roadmap to 2025 Well-Functioning Retail Energy Markets" which provides a guide for NRAs on how to proceed with collection of the metrics in the coming years. The first self-assessment took place in 2019 based on a questionnaire sent to all NRAs in 2018 (24 NRAs completed the exercise on electricity markets, 14 on gas markets). The process of self-assessment can be described as a journey that starts with data collecting, continues with the actual self-assessment together with a gap analysis, which leads up to national recommendations and monitoring of the implementation of those recommendations. NRAs set a national objective for each available metric in the Handbook and analyse the gap between the current situation described by the collected data and the national objective. When an NRA identifies a gap between the national data for a metric and the national objective for that metric, the NRA formulates recommendations on how to reach the national objective. The NRA also monitors the implementation of these recommendations. NRAs share the results of their self-assessment and gap-analysis on a voluntary basis. A national self-assessment of the retail market for energy is something CEER encourages, but it is not mandatory. Finally, CEER recommends self-assessment and gap analysis to be repeated annually. By re-evaluating the metrics via this work item, the most relevant gaps needing improvement can be addressed, particularly in light of the CEP which is now in force.</p>	Well-functioning markets; Consumer-centric design	ongoing	Q4 2022

No	Sector	Title	Description/output	Outcome	Strategy area	Expected start time	Expected end time
7	Distribution systems	3 rd CEER Report on Power Losses	Reducing power losses contributes to greater energy efficiency and security of supply and is an important goal, not least because the costs of power losses are often passed on to consumers. The 2 nd edition of the CEER Report on Power Losses was published in early 2020. As a preparation for working on the next edition, the Distribution Systems Working Group's Energy Quality of Supply Work Stream will start the preliminary work in 2021 with a publication of the report in 2022. This report will again provide a detailed overview of power losses (transmission and distribution) in electrical grids – the levels of losses, how they are defined, calculated and valued across as many European countries as possible (the 2 nd report included 35 countries). With this report, NRAs and other relevant stakeholders can identify some good practices and may decide to adapt their legislation. Since decarbonisation is of greater importance now and in the future, it is obvious that knowledge about the amount and structure as well as possibilities to reduce losses is essential. The past two editions began to analyse these aspects and will examine them more closely in future editions. This work item will include a questionnaire for NRAs.	Reducing power losses contributes to greater energy efficiency and security of supply and is an important goal, not least because the costs of power losses are often passed on to consumers. Energy efficiency is an important contribution to decarbonising the European energy sector. Therefore, it addresses CEER's core areas of sustainable and efficient infrastructure (and decentralised and local energy) and it is important for CEER to continue this exercise to identify power losses in and the impacts on the electrical grids.	Sustainable and efficient infrastructure; Decentralised and local energy	Q4 2021	Q4 2022
8	Distribution systems	Short paper on how Member States determine new connections and use 'flexible' connections	In several Member States (MS) DSOs are faced with the challenge of realising an increasing number of new connections for decentralised (mostly renewable) electricity generation to a distribution network that is already constrained. In order to facilitate the injection of as much generated electricity as possible several MS have adopted an approach that is based on 'flexible' connections, also known as interruptible or non-firm connections. However, the approach adopted differs across MS and raises the question whether there are valuable lessons to be learnt on the EU level. These lessons can be identified in a short paper on this topic by addressing questions like: - How do DSOs deal with the challenge of realising new connections and how do they prioritise between them? - What kind of flexibility conditions are being used for new connections? - How have MS governments and NRAs responded to this issue thus far? - How could current approaches be further improved?	Decentralised renewable electricity generation in distribution systems is vital in achieving sustainable electricity and climate targets set at the EU and MS level. When DSOs are not able to timely realise new connections then valuable time and renewable energy is 'lost'. Adopting new approaches involving 'flexible' connections is a valuable solution by which as much new generation can be connected to the distribution system. This contributes to an efficient use of all available infrastructure capacity. However, adopting such an approach also poses questions on the manner in which it is implemented. For example, regarding the principle of non-discrimination between new network users requiring a connection: how should new connections be prioritised?	Flexibility; Decentralised and local energy	2022	Q4 2022
9	Distribution systems	Review of data shared by DSOs	This work will build on the (online) workshops held at the start of 2021, which discussed the importance of data to the system, both to enable coordination across the whole system and also to facilitate the growth of flexibility markets. It would use consultancy support to map the data that is being shared at the moment and capture more detailed information from stakeholders on the type of new data they believe they need to access to better facilitate coordination or offer flexibility to the market. Another point to the	There was overwhelming agreement in our previous workshops on the importance of data in enabling flexibility markets and efficient planning and operation of the whole system. But there is a need to get more specific and understand what the core data needs are, to help NRAs pinpoint which data they need to focus on and where regulatory intervention is needed. Understanding the current data that is made available – and to whom – and engaging with stakeholders to understand what their needs are is a resource consuming project. The impact of this consultancy support would be to get a better understanding of current practices and help categorise the core data needs that NRAs can then focus on, to better facilitate flexibility, efficient integrated planning, and future flexibility markets.	Flexibility; Sustainable and efficient infrastructure	2022	Q4 2022

No	Sector	Title	Description/output	Outcome	Strategy area	Expected start time	Expected end time
			study is the location and availability of data needed to boost flexibility at DSO level.				
10	Distribution systems/ Customers and retail markets	Electric Vehicles	<p>This report will explore considerations that arise with the emergence of business models for electric vehicles (EVs), from the consumer perspective as well as the infrastructure planning and management perspective.</p> <p>The growth of electric vehicles will result in additional electricity use, and also potentially offer flexible support to managing networks. What is uncertain is the rate of growth and where it will take place, which is challenging for both DSOs to effectively plan and for NRAs to consider reasonable funding levels and the effectiveness of DSOs. This paper will look at how these uncertainties are being managed in different countries, in terms of planning, the amount and type of monitoring being rolled out to support planning and operation, data sources, coordination and tariffs.</p> <p>Possible issues to be explored from the consumer perspective include access to infrastructure, billing and payment methods, consumer choice and comparability of services, (price) transparency for charging services for EVs, protection of vulnerable or energy poor consumers, etc.</p>	<p>With the roll-out of EVs, there will be trade-offs between investing in the network to future proof for future needs and not restrain EV growth; and the cost to consumers that may be higher than necessary if the future needs do not materialise when and where anticipated. In addition, it is likely that to support network planning and operation, especially where EVs are used to provide flexible solutions to networks, or even enable self-consumption, there will be an increasing need for more active monitoring of low voltage networks. But again the balance may need to be struck between good data and costs to the consumer – what is necessary for the system to be efficiently managed.</p> <p>The impact of this paper is to provide insight and guidance to NRAs on issues to consider when establishing and reviewing consumer rights and market arrangements with respect to electric vehicles, as well as how effective DSOs are being with respect to planning and operation of DSO systems, given the uncertainty of the pace of EV take up and the impact it could have on the system. With the rapid growth of electric vehicles across Europe, such insights and guidance should help with the NRAs' rulemaking and implementation of the regulatory framework (e.g. networks and consumer rights).</p>	Sustainable and efficient infrastructure; Flexibility	2022	Q4 2022
11	Distribution systems	Paper on the Cybersecurity Network Code	The upcoming Cybersecurity Network Code will define functions and obligations for electricity market stakeholders in order to prevent and mitigate cyber incidents in electrical system.	The Network Code will define functions and obligations for electricity market stakeholders in order to prevent and mitigate cyber incidents in electrical system. The outcome of this document is to inform NRAs on their new functions and on the new obligations of regulated operators.	Well-functioning markets; Flexibility	Q1 2022	Q2 2022
12	Electricity	Biennial RES Status Review of Renewable Support Schemes in Europe	This document will cover data for 2020 and 2021 and will form the latest update to the regular biennial CEER Status Review of Renewable Energy Support Schemes in Europe. These documents collect comparable data on RES support in Europe (e.g. by technology and support type).	The RES Status Reviews are important CEER publications which are much used by stakeholders to understand the latest status of the national support schemes for RES (electricity). This deliverable is also interesting for regulators to learn from other national situations. By providing these status reviews on a regular basis, CEER supports the evolution to more market-based solutions for RES.	Energy system integration; decentralised and local energy	Q2 2022	Q4 2022
13	Electricity	3 rd CEER Report on Tendering Procedures for RES in Europe	This CEER report focuses on RES tendering procedures as it is one of the significant changes introduced for RES support in the EU. Tendering procedures are instruments to determine the financial level of support for electricity sourced by RES. Particularly following the Clean Energy Package, Member States are urged to opt for such market-based mechanisms. This report aims to present an updated overview of the key design elements of RES tendering procedures applied in most European countries.	Using market-based approaches to determine the level of RES support should generally result in more cost-efficient outcomes. By providing these overviews on a regular basis, CEER supports the evolution to more market-based solutions for RES. Another outcome of the report will be to inform stakeholders to which extent regulators are having ongoing transitions towards tendering procedures.	Sustainable and efficient infrastructure; energy system integration	Q1 2022	Q2 2022

No	Sector	Title	Description/output	Outcome	Strategy area	Expected start time	Expected end time
14	Electricity	- Follow EC Offshore Strategy implementation steps	The European Commission will follow up on the Offshore Renewable Energy Strategy published in 2020. This will affect a number of areas in relation to the electricity market design. With this deliverable, CEER will continue to follow the overall process and coordinate regulatory input where needed.	Offshore renewables need to be integrated efficiently in the existing market designs – possibly with some modifications or tailored rules for the area. Wrong design choices may have significant impact on the existing markets; therefore, this work should further carefully analyse the proposals from the CEER Strategy and its implementation.	Well-functioning markets; Energy system integration	2022	Q4 2022
15	Electricity	- Follow legal process and provide input on the EC Hydrogen and Gas Market Decarbonisation Package	The European Commission will put forward legislative proposals for decarbonisation and sector integration by the end of 2021. Regulators are supposed to follow the process actively and to provide input on several dimensions (European Commission, Member States, Parliament). CEER gas experts will be largely responsible for this process, but also electricity experts will reflect on areas important for the electricity sector and issues related to the electricity market design.	The outcome of this deliverable is to support the achievement of an efficient and well-functioning integration across energy carriers.	Energy System Integration; well-functioning markets	Q1 2022	Q3 2022
16	Market Integrity and Transparency	Financial regulation and the links to REMIT	Gas and electricity markets have their own dedicated regulation to address market abuse and transparency – the REMIT. Recently, there have been some attempts to revise the existing legislation in a restrictive way and replace energy regulators with financial regulators in supervisory tasks for the concerned products. CEER has stated publicly that this would be inappropriate, inconsistent and inefficient considering the experience gained in this field by energy regulators. This deliverable is kept in case further public actions are needed in this respect (e.g. responses to public consultations, position papers, official letters...).	Recently, there have been some attempts to revise the existing legislation in a restrictive way and replace energy regulators with financial regulators in supervisory tasks for the concerned products. CEER has stated publicly, in the response to the European Securities and Markets Authority (ESMA) Consultation Paper on MiFID II review report on position limits and position management, which this would be inappropriate, inconsistent and inefficient considering the experience gained in this field by energy regulators.	Well-functioning markets	ongoing	Q4 2022
17	Gas	Accompanying the Hydrogen and Gas Market Decarbonisation Package along the legislative process	CEER will accompany the legislative process of the Hydrogen and Gas Market Decarbonisation Package and will react jointly to proposals presented by the European institutions. During this process, a number of different work items will be implemented flexibly, depending on the legislative developments. Such flexible work items could include drafting position papers, or organising CEER discussions, webinars or workshops.	The legislative proposals related to the Hydrogen and Gas Market Decarbonisation Package are highly relevant to the European energy transition and thus to energy system integration. The topics discussed in the Package have the potential to shape the European Energy Market for the coming decades. Hence, it is crucial to stimulate a discussion on how to empower consumers in the process. Desired impact/outcomes: establishing the importance of consumer rights and the ASPIRE principles in the legislative proposals and in the discussions around the H2 and GMD Package; develop common European regulatory perspectives on the future energy mix and H2 networks; provide guidance to relevant stakeholders on issues under NRA competence.	Energy System Integration; Well-functioning markets	ongoing	2023
18	Gas	Gas Infrastructure Repurposing: Costs and Planning	Decarbonisation should lead to reducing gas demand and developing hydrogen. Adapting gas infrastructure to hydrogen is an important aspect of this dynamic. The paper will investigate the repurposing options and costs with a literature review and will gather current practices and expectations at national level. The planning of these developments will also be addressed.	The planned Position Paper will deal with some of the key questions when discussing the energy system integration: What will be the costs for gas infrastructure repurposing and who will pay them? How can NRAs support the efficient planning of this development? Outcomes: identify relevant approaches to repurposing and develop appropriate hydrogen infrastructure at least cost; summarise common positions of European NRAs on the state of play and potential recommendations.	Energy System Integration; Sustainable and efficient infrastructure	2022	Q3 2022
19	Gas	Stakeholder Workshop on long-term energy storage	CEER proposes to organise a stakeholder workshop to discuss the recommendations of the long-term energy storage deliverable. The aim is to receive feedback from infrastructure operators and market players on the need for regulation and potential orientations. A conclusion paper will be prepared.	This work item builds on CEER's previous work on long-term energy storage. Outcomes: Obtain feedback from stakeholders on recommendations (regulation, storage value), and provide guidance on issues relating to well-functioning markets (resilience, reliable and secure supply, new business models), energy system integration and flexibility.	Sustainable and efficient infrastructure; Flexibility	2022	Q1 2022

No	Sector	Title	Description/output	Outcome	Strategy area	Expected start time	Expected end time
20	Gas	The role of LNG in the New Energy Market	Within the context of the Hydrogen and Gas Market Decarbonisation Package and depending on the final outcomes for LNG terminals, CEER will study how to implement the new rules for regulated LNG terminals in a harmonised way across Europe and/or develop guidelines for their implementation. One of the subjects for the report could be the end of certain exemptions enjoyed by several LNG terminals in Europe. In this context, CEER may develop a common position of European NRAs on the future regulatory regime for these infrastructures and how to ensure a true level playing field within the European LNG market.	Regulating European LNG terminals in a harmonised way is crucial to well-functioning markets. Thus, CEER will continue to support the European institutions in the process of decarbonisation and will advise on the role of LNGs in this process. This deliverable should contribute to the thinking of the European Commission regarding policy & legislation on LNG so that it can better accommodate any upcoming regulatory changes and ensure a true level playing field within the European LNG market. Outcomes: adapting a common position of European NRAs on the regulation of LNG terminals in the context of the Hydrogen and Gas Market Decarbonisation Package.	Well-functioning markets; Flexibility	2022	Q4 2022
21	Regulatory Benchmarking	Webinars on Dynamic Regulation	This is ongoing work on the dynamic regulation topic. The main objective of the webinars is to have an exchange among CEER and stakeholders involved in the work on dynamic regulation (e.g. presentation of different papers dealing with this topic, presentation of sandboxes, pilot projects or existing models of dynamic regulation cases).	The aim is to discuss the results and the recommendations of a consultant to be hired by CEER for dynamic regulation assessment and draw conclusions (summaries) regarding the way forward.	Flexibility	Q4 2021	Q4 2022
22	Recurring/ cross sectoral	Regulatory Frameworks Report 2022	The Regulatory Frameworks Report (RFR) is an annual report which delivers a general overview about the implemented national energy regulatory regimes, the efficiency developments and it analyses the overall determination of capital costs. This report was previously named as the Investment Conditions Report. For years, the report is very popular by many stakeholders as it provides a clear overview of the national regulatory regimes for the energy sector. Market participants and other stakeholders use the RFR to identify the regulatory regime in certain countries. TSOs/DSOs can benchmark how other countries deal with the financial issues they face, which are reflected in the regulatory frameworks. NRAs tend to use the RFR to compare their own regulatory regimes to those in other countries. It can therefore be considered as a hugely informative CEER report. The 2022 report will be the 11 th edition of the report.	Regulatory frameworks are conditional to many financial issues TSOs and DSOs face, including financial issues related to internal energy market. The RFR is a report relevant for CEER in general and is one of the top downloaded CEER publications. Market participants and other stakeholders use the RFR to identify the regulatory regime in certain countries. TSOs/DSOs can benchmark how other countries deal with the financial issues they face, which are reflected in the regulatory frameworks. NRAs tend to use the RFR to compare their own regulatory regimes to those in other countries. Therefore, the impact of the report is to inform stakeholders.	Well-functioning markets; Sustainable and efficient infrastructure	Q1 2022	Q4 2022
23	Recurring/ cross sectoral	TSO Cost-efficiency Benchmark (TCB21)	The TSO Cost Efficiency Benchmark is a CEER deliverable that periodically measures the TSOs' cost efficiency. Such a benchmark is to ensure that tariffs are based on efficient cost as stipulated by European law, which is an important mandate of regulators. The benchmark helps to identify which TSOs are working efficiently, and which could be improved. The upcoming TSO Cost Efficiency Benchmark 2021 (TCB21) will be the sixth edition for electricity and the third for gas.	The TSO Cost Efficiency Benchmarks are relevant for CEER in general. Benchmarking of the costs of TSOs helps to ensure that tariffs are based on efficient cost as stipulated by European law, which is an important mandate of regulators. The benchmark helps to identify which TSOs are working efficiently, and which could be improved.	Well-functioning markets; Sustainable and efficient infrastructure	Q3 2022	2023

5 NEXT STEPS

Following a review of the comments received to this consultation, CEER aims to publish the final 2022 Work Programme in January 2022. As per usual practice, CEER will also accompany the Work Programme with our reaction on comments received via this consultation in the form of the Evaluation of Responses document.

Annex 1 – About CEER

The Council of European Energy Regulators (CEER) is the voice of Europe's national energy regulators. CEER's members and observers comprise 39 national energy regulatory authorities (NRAs) from across Europe.

CEER is legally established as a not-for-profit association under Belgian law, with a small Secretariat based in Brussels to assist the organisation.

CEER supports its NRA members/observers in their responsibilities, sharing experience and developing regulatory capacity and best practices. It does so by facilitating expert working group meetings, hosting workshops and events, supporting the development and publication of regulatory papers, and through an in-house Training Academy. Through CEER, European 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.

In terms of policy, CEER actively promotes an investment friendly, harmonised regulatory environment and the consistent application of existing EU legislation. A key objective of CEER is to facilitate the creation of a single, competitive, efficient and sustainable Internal Energy Market in Europe that works in the consumer interest.

Specifically, CEER deals with a range of energy regulatory issues including wholesale and retail markets; consumer issues; distribution networks; smart grids; flexibility; sustainability; and international cooperation.

CEER wishes to thank in particular its Work Programme Drafting Committee for their work in preparing this document.

More information is available at www.ceer.eu