

## Response to consultation

# BEUC's input to the revision of EU energy security

## Why it matters to consumers

People have been locked into an energy and transport system fundamentally based on imported fossil fuels. This has a negative impact on the planet, our health, wallets, and geopolitical security. Change is afoot to decarbonise our economy, influenced by clear EU policies in energy, the automotive sector, and product design. A well-managed transition to affordable, clean, and diversified (localised) energy is a major component of improving Europe's security.

**Published** | 13 October 2025

**Contact** | [energy@beuc.eu](mailto:energy@beuc.eu)

**Reference** | BEUC-X-2025-094

**Document coordinator** | Laurens Rutten

**Credit** | Photo by Acres of Film from Pexels

### **BEUC, The European Consumer Organisation**

Bureau Européen des Unions de Consommateurs AISBL | Der Europäische Verbraucherverband

Rue d'Arlon 80, B-1040 Brussels • Tel. +32 (0)2 743 15 90 • [www.beuc.eu](http://www.beuc.eu)

EC register for interest representatives: identification number 9505781573-45



*Co-funded by the European Union. Views and opinions expressed are however those of the author(s) only and do not necessarily reflect those of the European Union or EISMEA. Neither the European Union nor the granting authority can be held responsible for them.*

BEUC notes that the energy price crisis was a gas price crisis<sup>1</sup>, and that affordability is people's first expectation of EU energy policy<sup>2</sup>. Relying too much on external actors for fossil-fuelled energy has proven to run against this affordability and, as a result, European security interests. From a consumer policy point of view, a well-managed transition to affordable, clean, and diversified (localised) energy is a major component of improving Europe's security.

In this context, any reform of energy security legislation must maintain high levels of consumer protection and a clear path to clean energy. **A prerequisite is that the EU does not backtrack on laws for (consumer engagement in) the climate and energy transition agreed during the last decades.** Any backtracking will cause confusion for: a) people's – often long-term – energy decisions, b) the strategies of the businesses who are essential in providing consumer products and services for the transition.

Below, BEUC provides consumer policy recommendations and evidence to strengthen Europe's energy security, among others via a reduction of our dependence on fossil fuels.

## 1. Make clean technologies available, accessible, affordable, and easy to use

Consumers will save money by switching to solar panels, heat pumps and electric cars.

In terms of heat pumps, testimonials from early adopters show they are generally happy with the thermal comfort by these devices. What stands in the way of adoption are high taxes and levies ('policy costs') on electricity – illustrated by consumer organisations in Belgium, Greece – making heat pumps more expensive to run than fossil fuel boilers. Such price signals need to be revisited by Member States. Consumer organisations can accompany Europeans in the transition, which is why we are running a project ('CLEAR-HP') to support people along their purchasing journey for a heat pump. BEUC has always cautioned against the use of hydrogen in heating, as it is not cost-effective.

In terms of electric cars, BEUC's evidence underlines that second-hand battery electric vehicles are the best financial choice for consumers already. To increase the availability on this market, we call on the European Commission to electrify corporate car fleets and to avoid costly e-fuels. Buying or leasing a car is one step: BEUC has long advocated for a more convenient public charging experience. Competent authorities should monitor the car charging market, while BEUC calls for strengthening the Alternative Fuels Infrastructure Regulation's requirements further.

---

<sup>1</sup> See: Regulatory Assistance Project (2022), *Electricity market reform, beyond the gas crisis*

<sup>2</sup> See: European Commission, Eurobarometer (2024), *European's attitudes towards energy policies*

One of today's challenges is the different interests between renters and owners, or for owners in a homeownership association. A project ran by BEUC between 2021-2024 to promote clean energy solutions ('CLEAR-X') showed that these different interests ('split incentives') are a barrier to renewables adoption. Slovenia stood out as a country where tenants can become adopt solar panels if they get clear consent from a building owner: other EU Member States should explore this option.

Meanwhile, plug-in solar panels<sup>3</sup> provide a solution for those who cannot install larger solar panel installations on a roof. The uptake of these panels could be promoted by EU Member States, accompanied by clear safety standards and information to consumers.

## 2. Protect consumers from price fluctuations in an electrified energy system

The emerging energy system requires a different way of managing supply and demand, with household consumers playing a role. While not everyone can adapt energy use to price signals, they would benefit from reduced system costs if others do by reducing pressure on the electricity grid and the associated costs for it.

Suppliers should design their flexibility offers with different types of consumers in mind. For example, offers with a 'price corridor' can ensure flexibility appeals to people who may worry about the risks of fluctuating energy prices. 72% of respondents to a survey by BEUC's German member said that protection against sharp price increases would make flexible ('dynamic') tariffs more attractive.

## 3. Prepare for the decommissioning of gas grids

The shift away from fossil fuels will see the phaseout of gas. As the number of gas network users declines, the bills of consumers who remain connected will likely increase once network costs are distributed over a shrinking user base. This is likely to impact people who already struggle to pay their bill, as it is more difficult to afford the necessary upfront costs for cleaner heating. BEUC has therefore begun a project to better understand the consumer policy implications of gas grid decommissioning<sup>4</sup>.

---

<sup>3</sup> As described by BEUC's Belgian member Testaankoop/Testachats, "installing a solar kit with a panel that you plug directly into a socket in your home is a convenient option for people on a limited budget or tenants. You order it online, have it delivered to your home and simply connect it".

<sup>4</sup> We expect to publish the results and our recommendations in 2026.

## 4. Implement and enforce new consumer protection measures in EU energy legislation

The 2024 reform of the EU's electricity and gas directives introduced new provisions to protect consumers from disconnections and a 'supplier-of-last resort' that steps in when another supplier goes bankrupt. These provisions must be implemented and enforced.

## 5. Ensure cybersecurity 'by design and by default'

Most consumer services are moving to a digital environment. And the emerging energy system can only function with sufficient digitalisation (such as smart metering). A cyberattack on companies can greatly impact the functioning of our daily lives. This also applies if consumer products or applications were to fail in terms of their cybersecurity<sup>5</sup>. It is therefore crucial to raise the bar on cybersecurity: Member States must enforce EU rules on the cybersecurity of essential services (the Network Information Systems 2 Directive) and connected devices (the Cyber Resilience Act). It is crucial that any incident pertaining to the essential infrastructure or connected devices is reported to various regulators (e.g. data, energy, consumer) as well as EU cybersecurity agency ENISA.

## 6. Boost democratic and local energy

European Commission guidance to Member States for energy communities and energy sharing can further democratise energy, and stimulate effective use of generated energy. Continued monitoring by the European Commission and national authorities is needed to analyse what schemes work well.

## 7. Connect 'security' to wider energy and sustainability measures

A move to electrified cooling, heating, and transport is one side of the coin. Measures to use energy efficiently, or use it less, must always be explored. Here, BEUC calls on the

---

<sup>5</sup> BEUC has not investigated the cybersecurity of energy-related products or services at this time. However, here is an example of our existing work on (the lack of) cybersecurity for connected products.

European Commission to: a) continue working on energy-efficient consumer product design; b) reform EU car labelling legislation; c) introduce an eco-score for electric cars; d) promote alternatives to the car and plane; e) ensure that is what is marketed as 'green' is truly green.

Finally, European Commission plans for housing renovation and affordability must focus on the existing stock – since most buildings Europeans will inhabit by 2050 already exist today with the majority being energy-inefficient.

This response on energy security must be read together with input to other EU actions that aim to decarbonise Europe, make energy more affordable, and create a just transition.