

Response to consultation

CEER Strategy 2026-2029

Why it matters to consumers

The energy sector is complex, and many consumers struggle to fully participate in the market or benefit from the opportunities the energy transition offers. Recent reforms have introduced new rights and protections to help consumers and ensure they are properly protected. However, these improvements will only become a reality and consumers will only be adequately protected with the help and active involvement of national regulators and the Council of European Energy Regulators (CEER).

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Summary

BEUC welcomes the opportunity to comment on the Council of European Energy Regulator's (CEER) 2026-2029 Strategy '*Ensuring regulatory stability and citizen engagement amidst change to reach the decarbonisation goals efficiently*'. Our input to this consultation reflects the joint [BEUC-CEER 2030 vision](#) for energy consumers, as well as a new vision paper on energy that BEUC will release in the second half of 2025. In our reply, we emphasise the following points:

- BEUC agrees that the six core ASPIRE principles set out in the CEER-BEUC 2030 Vision for Energy Consumers remain highly relevant and should continue to guide regulatory work.
- In our response, we strongly support the proposed priority on regulatory stability and citizen engagement.
- CEER provides a platform where national authorities can exchange best practices and coordinate on the enforcement of EU law against non-compliant actors. We urge regulators to identify gaps in the current EU legal framework and propose regulatory and legal solutions to address them.
- BEUC highlights that the independence of CEER and its National Regulatory Authorities is extremely important for the monitoring of market developments, consistent application of EU rules, promotion of competition and protection of consumers in the energy markets.
- Regulators should monitor and assess national approaches to doorstep and telephone sales of energy contracts, as well as explore ways to improve consumer access to renewable energy, such as balcony solar.
- In addition to the promotion of efficient integration of low-carbon and renewable gases, CEER should likewise support regulatory frameworks for the decommissioning of gas networks.

To what extent do the proposed strategic priorities protect and empower consumers in light of the identified opportunities and challenges following the energy crisis?

In this regard, it is critical that CEER adequately monitors the implementation of the recently adopted legislation and new consumer rights. While some of these rights look good on paper, they need to be implemented (and enforced if necessary) to benefit consumers on their day to day. Unless it is easy to benefit from these rights, consumers will continue to struggle and hesitate when it comes to getting involved in the energy transition. CEER and its members have a very important role to play in this regard.

It is not only about implementing recently adopted legislation, but also “older” legislation. For example, despite being mandatory by the Electricity Directive, not all Member States have put in place an independent comparison tool. Also, consumers should have been entitled to benefit from dynamic price contracts since 2019, but too many Member States have not yet made these available to consumers. CEER should monitor these worrying developments closely and assess in coordination with its members, the reasons behind these delays.

Also, while implementation of existing legislation is paramount, enforcement of EU rules is one of the most important tasks of national regulatory authorities. In this regard, CEER can play a crucial role by creating a space where national authorities can exchange best practices and coordinate on the enforcement of EU law against non-compliant actors. In the context of these tasks, CEER should also identify gaps in the current EU legal framework and propose legal solutions to overcome them either through the review of existing law or the adoption of new ones.

We also welcome that the strategy recognises that **not all consumers can engage in the same way**. People have different incomes, routines, health requirements, risk appetites, and possibilities to make decisions about their energy use (renters vs. owners, apartments vs. houses). This will affect their ability to ‘engage’ with the energy transition.

We welcome that **affordability** remains one of the key priorities. The first expectation consumers have towards EU energy policy is to “ensure affordable energy prices”. The share of consumers mentioning affordability as the number one priority has grown significantly compared to 2020, which is understandable given the price increases experienced during the energy crisis.

We strongly support that CEER will continue monitoring the **emergence of new actors and services**. As mentioned above, new energy services and tools, such as intermediaries that facilitate switching, must be closely monitored, and rules developed where necessary to strengthen consumer protection.

We agree that **price signals** can deliver benefits to consumers. For example, heat pumps should be made more competitive with fossil fuel heating by ensuring that consumers receive the right price signals. In most Member States, taxes and levies on electricity are higher than those on fossil fuels.

When it comes to **electricity grids**, investments must always be subject to careful analysis regarding their rationale, necessity, and the impact they will have on the network

tariffs paid by all consumers. Network tariffs must be fair, transparent, predictable, cost-reflective, and well-communicated.

Does the strategy reflect new challenges while also continuing the path of the previous strategy?

We agree that the independence of CEER and its National Regulatory Authorities is extremely important for the monitoring of market developments, consistent application of EU rules, promotion of competition and protection of consumers in energy markets.

Regarding **digitalisation**, we recognize that digital tools such as smart meters and AI offer the opportunity for more efficient and better-informed consumption. However, digital innovation also brings challenges. For example, in a recent report, BEUC's Norwegian member Forbrukerrådet identified the linking of the sale of real-time meters to a subscription. This creates a lock-in effect and barrier to switching as consumers will have to pay for another smart meter if they change provider. Forbrukerrådet calls for a common standard for real-time meters so that consumers do not run the risk of having to buy a new meter every time they change supplier.

BEUC also urges CEER to focus an overall approach of privacy by design and by default to digitalisation of the energy sector in line with the General Data Protection Regulation (GDPR). Key principles of this Regulation, such as purpose or data minimisation, should always be respected. In this regard, we encourage CEER to engage in further discussions on how energy regulators should cooperate with other (e.g., telecoms, data protection and product safety authorities).

BEUC strongly supports ACER-CEER's **annual market monitoring report**. It provides very valuable data on the state of consumer protection and engagement as well as retail market developments and trends across Europe. It is a crucial tool to measure the level of satisfaction of consumers in the energy market on a yearly basis.

Additional priorities for regulators to consider

CEER should also look into the following topics:

- Comparison of national approaches to doorstep and telephone sales of energy contracts.
- Specific ways to improve consumer access to renewable energy, such as balcony solar.

BEUC would also welcome that CEER and its members coordinate increasingly with telecoms regulators to see what practices from that sector can be applied in energy and vice-versa. In addition, we suggest CEER to consider more **intra-regulator cooperation** with consumer, digital, financial, mobility, water, product safety and the aforementioned

telecoms authorities. Their work can mutually inspire. It can also be of intrinsic value to the success of the energy transition. For example, the upfront costs for clean energy technology requires innovative approaches to finance while avoiding over indebtedness. Meanwhile, flexibility relies on a more digitalised energy market which also has to comply with data protection and privacy by design and by default as mentioned previously.

As the strategy suggests focusing on questions of infrastructure, market design and cost recovery in relation to the integration of low-carbon and renewable gases, the analysis should likewise examine the **decommissioning of gas networks** and ensure that consumer protection is considered. CEER should play a key role in leading the debate and facilitating the exchange of expertise on this important issue.