

**BEUC's input to the public consultation**

# **2026 Work programme of the Council of European Energy Regulators (CEER)**

## 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

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BEUC highly values the work and the cooperation with the Council of European Energy Regulator's (CEER). We remain available to be involved in, and to provide evidence for CEER's priorities and workstreams in 2026. Our input to this consultation will reflect 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 particular, we would like to highlight the following elements:

- We welcome that CEER's work programme focuses on consumer-relevant topics, with the aim of identifying best practices, potential legislative and enforcement gaps, and ways forward.
- We strongly support the continuation of the ACER-CEER annual market monitoring report. For future editions, regulators should also monitor the progress and fulfilment of legal obligations, such as the availability of fixed-term, fixed-price, and dynamic contracts, the implementation of pre-contractual information and measures in place to protect consumers against disconnections.
- BEUC also highlights that 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 do not support the integration of renewable and low-carbon gases for residential heating. We strongly support the decarbonisation of residential heating through smart electrification and renewable-based district heating, as it will be the most affordable and clean solution to consumers.
- Regulators should prepare for the decommissioning of gas grids and ensure that consumers are well protected throughout this process. CEER should play a key role in leading the debate and facilitating the exchange of expertise on this important issue.
- The independence of CEER and its National Regulatory Authorities is extremely important for the monitoring of market developments and the protection of consumers in energy markets.

## Feedback on CEER's proposed priority areas

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BEUC welcomes CEER's three strategic regulatory priorities in its 2026 Work Programme.<sup>1</sup> We appreciate their complementary and interlinked nature, as well as the strong commitment to a resilient, consumer-oriented, and decarbonised energy system.

We also value CEER's strong focus on consumer protection and empowerment in relation to affordability and accessibility. It is important that the focus on vulnerable consumers, as highlighted under the second priority, is maintained across all relevant work streams.

The emphasis on transparent pricing and monitoring new actors and services is key and closely linked to the priority on 'optimising market-oriented solutions to deliver best results for consumers and the energy system'. We highlight the importance of CEER and National Regulatory Authorities (NRAs) continuing to ensure that consumers are guided through the complex energy market environment. Consumers must be able to access new offers while being adequately protected. Given the development and wider use of smart energy technologies and services, the principles of privacy by design and by default, data minimisation, and purpose limitation must be followed. Therefore, cooperation with data protection regulators is crucial, in addition to the cooperation with financial, competition and telecommunication regulators that is mentioned in the work item 10.

Regarding CEER's priority on 'deepening integration of a decarbonised energy system', including the efficient integration of renewable and low-carbon gases, BEUC welcomes the objective of promoting regulatory clarity across sectors. This will ensure that infrastructure planning is aligned with long-term decarbonisation objectives. As mentioned below, BEUC does not support the integration of renewable and low-carbon gases for residential heating. We strongly support the decarbonisation of residential heating through smart electrification and renewable-based district heating, as it will be the most affordable and clean solution to consumers. Finally, we also see limited discussion on the decommissioning of gas networks and the implications for consumers, where BEUC would expect CEER to play a crucial role in the debates.

## Feedback on CEER's proposed deliverables

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The Work Programme's deliverables reflect the diverse challenges and opportunities of the energy transition that change the way consumers use energy.

BEUC welcomed the reference to the '[CEER-BEUC 2030 vision for energy consumers](#)' in CEER's strategy for 2026-2029 and encourages CEER to reflect the principles of affordability, simplicity, protection, inclusiveness, reliability, and empowerment

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<sup>1</sup> Optimising market-oriented solutions to deliver best results for consumers and the energy system; Empowering and protecting consumers, while promoting affordability and accessibility; Deepening integration of a decarbonised system.

throughout its workstreams. While published in 2020, its principles are still relevant today and need to be implemented to fully empower consumers.

Beyond the gas and electricity sectors, BEUC would also welcome a regulatory perspective on consumer rights and protection in the district heating sector.

Finally, BEUC remains available to engage with and to contribute to CEER's priorities and workstreams in 2026. We highly value our long-standing cooperation with CEER and look forward to continuing our collaboration.

## BEUC's response to the proposed individual work items

*Please note: BEUC provided input on work items 1, 2, 3, 6, 7, 9, 10, 11. For the sake of brevity, the other work items are not listed in this document*

### Work item 1: Concept title: Aggregation and Demand Response

Description: This document will analyse key challenges and best practices related to aggregation and demand response, focusing on market dynamics, regulatory barriers, consumer engagement, and technical integration. It will serve as a practical reference for stakeholders, including NRAs, aiming to support the effective development and implementation of aggregation and demand response across Europe.

BEUC supports this work item and its focus on consumer engagement. We encourage a close examination of rights and protections enjoyed by consumers engaged in flexibility.

BEUC agrees with energy regulators that flexibility “come[s] in many different forms and shapes”. Such a broad approach to flexibility can make it appeal to different kinds of people across Europe with different lives and risk appetites for variations in their electricity price. However, it is crucial to recognise that not everyone will be able to change the time at which they use electricity. Beyond price, household composition, health, literacy needs, and neurodiversity can also affect people's ability to partake in flexibility and the energy transition - as pointed out by BEUC's UK member Citizens Advice.

A market analysis of comparison tools offering flexibility offers would enable a reflection on how to communicate and compare these offers. It would also be of interest to have an overview of how the costs and (dis)advantages of flexible tariffs are presented in comparison tools and on supplier's websites. This would allow regulators to evaluate whether minimum information standards are necessary and learn from best practices.

### Work item 2: Follow-up and sharing of good practice regarding implementation and monitoring of Article 18a on supplier risk management

Description: This deliverable will follow up on CEER's 2024 report on prudential regulation and examine how Article 18a of Directive (EU) 2024/1711 is being implemented across Member States. It will collect and share experiences on how NRAs or designated authorities monitor suppliers' hedging strategies to ensure effective risk management while preserving market signals.

BEUC welcomes CEER's plan to collect and share experiences on the implementation and monitoring of suppliers' hedging strategies. In addition, we encourage the assessment of practical examples of what 'appropriate hedging strategies' (Article 18a of the Electricity Market Design reform) means for the supplier-consumer relationship – as well as the competitive landscape between suppliers.

BEUC's French member Consommation, Logement et Cadre de Vie (CLCV) shared evidence of their numerous court cases against electricity and/or gas suppliers caused by insufficient hedging. This includes a case from 2021 on electricity and a 2023 case by CLCV on gas<sup>1</sup>.

Germany's Verbraucherzentrale Bundesverband (VZBV) calls for a number of measures to monitor and ensure the performance and reliability of all energy suppliers on the market. First, VZBV recommends suppliers should submit an audit report to the energy regulator at regular intervals. Second, the regulator must also be obliged to continuously review the staffing, technical and economic performance as well as the reliability of the management of an electricity supplier operating on the market. Finally, VZBV calls for clear minimum standards to be established to provide benchmarks that can be measured. These can then be used for example to allow a regulator to withdraw a supplier's operating license.

### **Work item 3: ACER-CEER Energy Retail Markets and Consumer Protection**

Description: CEER, in cooperation with ACER, will deliver the annual Market Monitoring Report (MMR) to the European Parliament, providing a comprehensive overview of retail market developments across Europe. The report focuses on consumer empowerment and protection, tracking national implementation of EU legislation. It covers topics such as pricing, price regulation, market structures, energy poverty, and active energy consumption. The analysis is based primarily on CEER's national indicators and surveys and includes recommendations to address barriers to completing the Internal Energy Market (IEM).

BEUC strongly supports the continuation of the ACER-CEER 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. For the new edition, it would be key to monitor and analyse whether existing consumer rights in the electricity gas markets are respected, and how the new rights and protections introduced by the Electricity Market Design reform and the Gas Directive have been implemented in all Member States. This includes examining:

- The availability of fixed-term, fixed-price, and dynamic contracts
- The availability of transparent, simple and clear summaries of key contractual information
- The level of adoption of flexible electricity price offers
- The measures in place to protect consumers against disconnections
- The switching rate of household electricity and gas consumers
- The existence of misleading offers or marketing practices (e.g. misleading doorstep-selling and telephone sales of energy contracts)
- Whether suppliers of last resort have been established in every country
- The types of energy sharing schemes available across Europe
- Whether the principles for price comparison tools are being followed
- The development of data spaces for energy

In addition, we recommend continuing to monitor energy poverty and identifying best practices to better protect vulnerable and energy poor households. CEER should make an overview of where and how social tariffs are accessible to vulnerable consumers.

It will be important not only to monitor independent comparison tools, but also to investigate consumer experiences with commercial, non-independent comparison tools, intermediaries and other digital tools that provide price comparisons and/or switching services that are currently not regulated.

Overall, the monitoring and evaluation should be aimed at understanding whether consumers are adequately protected and empowered to exercise their rights in the energy sector.

#### **Work item 6: Decarbonisation Package: a status review of national implementation**

Description: CEER will monitor the implementation of the Gas Decarbonisation Package, with a specific focus on provisions related to renewable and low-carbon gases. This activity will involve gathering and assessing national measures to identify how Member States are transposing and applying the relevant rules. Particular attention will be given to detecting regulatory or structural barriers that may impede the scale-up of renewable and low-carbon gases, including hydrogen and biomethane.

BEUC welcomes CEER's plan to monitor the implementation of the Decarbonisation package, including the implementation of the new rights that were granted to consumers.

We encourage CEER to pay special attention to how the distribution network decommissioning plans (Article 57 of Gas Directive) have been implemented and to ensure that this is done in line with the principle set in that article and in Article 13 on consumer protection.

In this context, the use of biomethane and hydrogen should not be promoted in residential heating. BEUC recognises that biomethane and hydrogen may become competitive compared to natural gas, but heat pumps will be the most cost-efficient solution for low-temperature heating.

#### **Work item 7: Regulatory Frameworks Report of European Energy Networks 2026**

Description: This annual report provides a comprehensive overview of the regulatory frameworks applied in 2026 across CEER member countries, covering both electricity and gas networks. It presents information on the regulatory treatment of transmission and distribution system operators (TSOs and DSOs), including relevant developments in efficiency requirements. As part of CEER's established series of yearly publications, the report aims to offer transparency and insight into the evolution of national regulatory regimes.

BEUC strongly supports this workstream. Please find BEUC's response to the European Commission's consultation on the European Grid Package in this document.

#### **Work item 9: CEER status review on NRA support to the Grids of the Future**

Description: This report will review the actions taken by national regulatory authorities (NRAs) in response to the European Commission's guidance on anticipatory investments for developing forward-looking electricity networks. Building on the recommendations outlined in the Commission's document, CEER will prepare a targeted questionnaire for NRAs to collect information on national implementation and practices. The paper will present a concise overview of the status across CEER member countries, highlighting how NRAs are addressing the recommendations.

BEUC supports CEER's intention to identify good practices and implementation gaps in regard to the development of forward-looking electricity networks. The electricity grid is an integral part of the transition towards affordable, reliable and clean electricity. Electricity grids are necessary; however, these should always be subject to careful analysis, especially regarding their rationale, necessity, and the impact they will have on costs for consumers. Therefore, we highly welcomed the (distribution) grid planning blueprint published by European energy regulators in July 2025. We also support regulators' call to balance infrastructure and flexibility; to improve transparency and public trust through publication, consultation and communication; for coordination among different system operators; and oversight by national regulators.

#### **Work item 10: Follow up work on NRA independence in a multi-sectoral environment**



Description: A follow-up workshop to continue the discussion on the CEER report on NRA independence in a multi-sectoral environment. We expect that NRAs' tasks will increase as public and political sentiment swings towards stronger regulation in some areas - tendencies we are already seeing, for example, in the areas of security of supply, energy efficiency, and renewable energy. The development of a true whole system approach will lead to regulation at the margins and at the interfaces of sectors (e.g. Vs), and innovation and new business models will require regulation to develop quickly. An overview of tasks outside the 'core' regulatory business listed in the Directives will provide insight into such recent developments and could indicate how NRAs are managing to maintain their independence in the face of these rapid changes.

The independence of CEER and its National Regulatory Authorities is extremely important for the monitoring of market developments, for the monitoring of market developments, a consistent application of EU rules, the promotion of competition and the protection of consumers in energy markets. BEUC strongly supports CEER's commitment to continue the discussion on NRA independence and to actively develop a whole system approach. BEUC appreciates the consideration of further discussions on how regulators cooperate with one another, such as if and how energy regulators are structured to facilitate cooperation with other regulators (e.g., telecoms, data protection and product safety authorities), and would like to take part in such discussions.

#### **Work item 11: Policy work on EU developments**

Description: This deliverable aims to enhance understanding of key EU institutional developments - particularly the European Commission's Grids Package and other relevant legislative updates impacting the energy sector. Through regular monitoring and reporting by the EPU Chairs and timely updates at Working Group meetings, CEER will support effective engagement with the EU policymaking process. This work underpins all three of CEER's strategic priorities by ensuring regulators are equipped to respond to evolving EU frameworks and can steer their advocacy activities accordingly.

BEUC appreciates CEER's commitment to actively contribute to the EU's policymaking process and encourage CEER and NRAs to contribute to the discussions to ensure that new action plans and legislative proposal are ensuring and promoting protection of consumer rights and needs.

BEUC looks forward to contributing to CEER's policy work and various work items. We welcome the focus on grids and call on CEER to follow and contribute to the following policy developments:

- Citizens Energy Package
- Electrification Action Plan
- Heating and Cooling Strategy

- AI and digitalisation for energy

Overall, all consumer-relevant actions in energy, whether part of the Affordable Energy Action Plan (or beyond) should be actively followed by CEER.