

Public consultation on a Communication on the Citizens Energy Package for a Just Transition and Consumer Empowerment

Fields marked with * are mandatory.

Introduction

The Citizens Energy Package for a Just Transition and Consumer Empowerment is linked to the delivery of the Affordable Energy Action Plan. It aims to help make it affordable and easy for all citizens to benefit from the internal energy market and to ensure a just transition that leaves no one behind. This means accelerating the concrete achievement of the Just Transition goals and to implement on the ground the EU rules and policies on consumer empowerment and protection. It thus aims to help not only those citizens who are already engaged, but also the energy poor and vulnerable and in particular consumers for whom energy is a significant part of their cost of living, but who currently lack the capacity to act on energy markets or actively participate in it.

The Package has a three-fold goal: first, it includes measures to enhance the Just Transition principle that no citizen is left behind; it addresses measures tackling energy poverty and supports the complex process of decarbonising coal regions. Secondly, it encompasses a set of actions to facilitate consumer activation, i.e. to promote citizens' participation in energy production and exchange both individually (as prosumers) and collectively through energy communities and energy sharing. Third, it addresses issues that affects all citizens in respect of the energy transition, in particular the need to ensure energy affordability. This implies to ensure public acceptance by citizens, to better inform them, address barriers to affordability, building a mutual trust relationships with suppliers and DSOs, and enhancing the role of local players and initiatives where the energy transition takes place. The feed-back from respondents will be important for the Commission's work to support the smooth and coherent transposition of EU rules on energy consumers through guidance to the Member States.

The Package will also help deliver the Clean Industrial Deal, fulfilling its commitments and promoting flexible market participation that benefits all consumers. It will be closely linked to the electrification and digitalisation strategies with a focus on ensuring that these are delivered in a consumer-friendly way.

This open public consultation together with targeted consultations on the guidance documents aim to ensure a wide understanding and ownership of the whole Package by key stakeholders – regulators, consumer organisations, industry, local and regional administrations, civil society and citizens. This consultation is thus

complemented by other consultation fora and processes, such as Citizens Energy Forum and the Regulatory Round Table, outreach events to different types of stakeholders, and working groups on consumers and on energy poverty.

We are very much interested in hearing your views on the Citizens Energy Package as described above.

Thank you in advance for your contribution.

*The following questionnaire consists out of 8 parts. It will start with questions on just transition and energy poverty, after which it will dive into questions on affordability and consumer empowerment and protection. **It is not mandatory to respond to all parts, you are free to respond to those parts that are of interest to you.***

The following topics will be part of the questionnaire

Section 1 on Just Transition and Energy Poverty

1. Questions on just transition, energy poverty and public acceptance
2. On disconnections

Section 2 on Consumer Empowerment

3. On energy communities
4. On active customers and energy sharing
5. On demand flexibility remuneration in retail contracts – dynamic and hybrid contracts

Section 3 on Consumer Protection, Affordability and Public Acceptance

6. On ensuring energy offers are easily understandable and comparable
7. On limiting risk of supplier bankruptcies
8. On consumer protection in natural gas phase-out

About you

* Language of my contribution

- ☐ Bulgarian
- ☐ Croatian
- ☐ Czech
- ☐ Danish
- ☐ Dutch
- ☒ English
- ☐ Estonian
- ☐ Finnish
- ☐ French
- ☐ German

- ☐ Greek
- ☐ Hungarian
- ☐ Irish
- ☐ Italian
- ☐ Latvian
- ☐ Lithuanian
- ☐ Maltese
- ☐ Polish
- ☐ Portuguese
- ☐ Romanian
- ☐ Slovak
- ☐ Slovenian
- ☐ Spanish
- ☐ Swedish

* I am giving my contribution as

- ☐ Academic/research institution
- ☐ Business association
- ☐ Company/business
- ☐ Consumer organisation
- ☐ EU citizen
- ☐ Environmental organisation
- ☐ Non-EU citizen
- ☐ Non-governmental organisation (NGO)
- ☐ Public authority
- ☐ Trade union
- ☒ Other

* First name

NN

* Surname

NN

* Email (this won't be published)

secretariat@energycoalition.eu

* Organisation name

255 character(s) maximum

The Coalition for Energy Savings

* Organisation size

- ☒ Micro (1 to 9 employees)
- ☐ Small (10 to 49 employees)
- ☐ Medium (50 to 249 employees)
- ☐ Large (250 or more)

Transparency register number

Check if your organisation is on the transparency register. It's a voluntary database for organisations seeking to influence EU decision-making.

72911566925-69

* Country of origin

Please add your country of origin, or that of your organisation.

This list does not represent the official position of the European institutions with regard to the legal status or policy of the entities mentioned. It is a harmonisation of often divergent lists and practices.

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Nevis | <input type="radio"/> Zimbabwe |
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The Commission will publish all contributions to this public consultation. You can choose whether you would prefer to have your details published or to remain anonymous when your contribution is published. **For the purpose of transparency, the type of respondent (for example, 'business association', 'consumer association', 'EU citizen') country of origin, organisation name and size, and its transparency register number, are always published. Your e-mail address will never be published.** Opt in to select the privacy option that best suits you. Privacy options default based on the type of respondent selected

* Contribution publication privacy settings

The Commission will publish the responses to this public consultation. You can choose whether you would like your details to be made public or to remain anonymous.

☐ Anonymous

Only organisation details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and your contribution will be published as received. Your name will not be published. Please do not include any personal data in the contribution itself if you want to remain anonymous.

Public

Organisation details and respondent details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and your contribution will be published. Your name will also be published.

☒ I agree with the [personal data protection provisions](#)

Section 1 on Just Transition and Energy Poverty

1. Questions on Just Transition and Energy Poverty

01. What priority actions are needed at EU, national and local level to ensure that just transition and consumer rights become concrete throughout all the EU Member States?

5000 character(s) maximum

The first priority action to ensure a just and fair transition that addresses the root causes of energy poverty is the full and ambitious implementation of the agreed EU energy efficiency framework. First of all, the Energy Efficiency Directive contains important provisions to mitigate energy poverty. The Energy Savings Obligation (EED Article 8) mandates that a share of the energy savings be delivered among vulnerable groups based on the national share of citizens in energy poverty. The obligation to renovate a share of public buildings each year (EED Article 6) should entail the renovation of social housing for the benefit of low-income households. Together with the obligation to improve the efficiency of public authorities (EED Article 5), Article 6 also has a role to play in order to grant citizens well-functioning and efficient infrastructures and buildings that can contribute to their well-being. Finally, in multi-apartment buildings, EED Articles 15 and 16 mandate the installation of individual meters to measure the consumption of heating, cooling and domestic hot water in each building unit. A strong and swift implementation of this provision will facilitate more frequent information on energy consumption and allow consumers to have better knowledge, and therefore control, over their energy use, leading to data-driven energy flow optimisation, helping to cut energy bills for the same level of indoor comfort. The implementation of the Energy Performance of Buildings Directive (EPBD) is also paramount, namely through the mandatory focus on the renovation of worst-performing buildings within the national trajectories for the renovation of residential buildings (Article 9). In addition, the provisions on financial incentives and market barriers (Article 17), One-Stop Shops (OSSs) (Article 18), and on the smart readiness of buildings (Article 15) are important to grant consumers more power over their energy consumption and give them the necessary tools to undergo energy efficiency improvements. The most vulnerable households and energy-poor need to be included and empowered to take part in the energy transition. Prioritising the disbursement of financial aid (especially if public), linking financial measures to the level of targeted or achieved energy savings and improvements, and introducing social safeguards is of crucial importance. Looking forward, and linked to the above, new actions by the European Commission should provide enabling conditions to ensure and accelerate the implementation of the energy efficiency framework, and support the reduction of the ambition gap for energy efficiency in the National Energy and Climate Plans. For instance, the measures announced in the Action Plan for Affordable Energy should be implemented to reduce the cost of energy, improve energy efficiency, and lower bills for European vulnerable households. Regarding financing, the inclusion of the promotion of energy efficiency as an objective of the several funds encompassed under the new National and Regional Partnership Plans and the European Competitiveness Fund in the proposed 2028-2034 Multiannual Financial Framework is a good step forward, but Member States should be further incentivised to direct available funds towards energy efficiency solutions. In particular, the Social Climate Fund and the revenue from the ETS 2 must be targeted at the most vulnerable, to ensure access to sufficient funding for those who cannot afford to install energy efficiency solutions. Such demand is backed by citizens, as the second recommendation of the Citizens Panel on Energy Efficiency calls for financing a “fair right to energy-related home renovation”, namely through an improved tax system and subsidy mechanisms. Member States should also be encouraged to mitigate energy poverty by financially supporting the participation of vulnerable households in energy communities. This would offer a long-term, structural path outside of energy poverty, while undertaking actions to tackle this issue, such as building renovations. We also call for the recognition of the enabling role of thermally efficient buildings in unlocking consumer participation and flexibility measures. Indeed, insulation measures can enhance the impact of technologies like smart meters and dynamic pricing, especially for vulnerable groups. Finally, further guidelines to support all policymakers in choosing cost-efficient energy efficiency solutions are also needed. For instance, the guidelines on the Cost-Benefit Analysis (CBA) and the sectoral guidelines for the EE1st principle, which could be published with this package, should be partly focused on offering advice and tailor-made solutions on how to involve citizens in energy efficiency projects. Specifically, the guidelines on the CBA could help highlight how to better evaluate and leverage projects that address the root causes of energy poverty when deciding on policy and financing priorities.

02. What are the main challenges to tackling energy poverty in the EU?

(Please rate according to importance)

	Very important	Important	Neutral	Less important	Not important	No opinion
High energy prices	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Effective identification of vulnerable and energy poor consumer	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Lack of energy efficiency in housing	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Limited access to renewable energy	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Income inequality	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Insufficient awareness and education about energy-saving measures and available assistance programs	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Inadequate financial support schemes	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Lack of political will	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

For 'Other', please specify:

2000 character(s) maximum

Regarding high energy prices as a challenge to tackle energy poverty, the Coalition would like to underline that high energy prices are rather a root cause of energy poverty. However, they also highlight the structural inequalities in households regarding their home energy performance, making them more vulnerable to price variabilities. This suggests that special protection through price mechanisms (social tariffs or direct payment) should be done in combination with targeted financial support conducive to save energy and better manage their energy consumption. Enabling energy-poor households to use their energy in a flexible manner is also an important challenge to ensure they are regarded and treated as actors in the energy transition and can benefit from it. Improving the thermal insulation of buildings and ensuring frequent provision of consumption data is crucial to ensure energy consumption patterns can be shifted, ensuring the adoption of more efficient habits and making energy-poor households active actors on the grid. Renovating these buildings while integrating and empowering vulnerable households (who often live in worst-performing buildings) will create an opportunity to reduce energy demand during peak times, lowering the total cost of the EU energy system. At the same time, citizens will be rewarded when shifting and reducing their consumption, which can help reducing energy poverty and increasing their involvement in the energy transition.

03. Do you think that, in addition to implementing existing EU legislation, other measures are needed to tackle energy poverty in the EU?

- ☒ Yes, new or additional measures (legal or other) are needed at EU level
- ☐ No, the focus should be on effectively implementing existing EU legislation on energy poverty with existing tools

If yes: Please elaborate on what measures, other than implementing existing EU legislation, are still needed to tackle energy poverty in the EU

3000 character(s) maximum

As mentioned previously, the implementation of the existing EU energy efficiency legislative framework is crucial to tackle the growing energy poverty in the EU. However, several additional measures could further facilitate and enable actions to mitigate energy poverty. First of all, Member States must be supported in targeting the vulnerable groups most affected by energy poverty. In that effort, an EU-level monitoring mechanism is needed, as many countries still use different methodologies, statistics and indicators to measure and therefore design policies towards energy-poor households. While taking into account national circumstances affecting energy poverty, such as different climate zones, an EU-level monitoring mechanism could improve the use and ringfencing of EU measures and funds, facilitate the assessment of impacts and help Member States to select the best typology of measures to mitigate energy poverty. Municipalities should be supported with resources to engage their communities district by district so they know their options to support the most vulnerables (RES, energy efficiency measures, energy sharing schemes, energy communities). This is already done successfully by some municipalities for example via energy tours to engage citizens, One Stop Shops, energy offices at district level, using national and regional programmes. In addition, new measures to address the improvement and decarbonisation of the heating & cooling systems in energy poor households are needed, given the costs and potential low return on investment of these solutions. Such measures could be presented in the Citizens Energy Package and/or the upcoming Heating & Cooling strategy. Finally, additional EU guidance could facilitate comprehensive building renovations that tackle both the envelope improvements and the installation of low-temperature and decarbonised heating systems, especially in energy-poor households residing in the worst-performing buildings. This would maximise system efficiency, reduce the size and cost of required equipment, and ensure buildings are thermally ready to participate in demand-side flexibility.

04. Would setting mandatory target(s) help Member States address energy poverty?

- ☒ Yes
- ☐ No

If yes, please elaborate (e.g. on methodology, indicators, timeframe etc)

5000 character(s) maximum

The Coalition for Energy Savings believes that setting mandatory targets for Member States to reduce the share of their population in energy poverty would bring attention to the importance of tackling this crucial issue. As for other existing national targets defined at EU level, each Member State's target should take into account national circumstances and starting points, using commonly agreed and replicable indicators. Namely, the four criteria used to define the energy poverty ringfencing of the Energy Savings Obligation (inability to keep the home adequately warm, the arrears on utility bills, the total population living in a dwelling with a leaking roof, damp

walls, floors or foundation, or rot in window frames or floor, and at-risk-of-poverty rate) could be a good basis to define these targets, adding other building specific criteria such as the average Energy Performance Certificate of the country's building stock. In terms of timeframe for such objectives, they could be synchronised with the timeline of the 2030 EU energy and climate targets or be defined as a linear year-by-year reduction.

2. On Disconnections

The energy crisis has exposed already energy poor and vulnerable consumers across the internal market to additional higher energy costs, further eroding their ability to continue paying their energy bills. Legislators have then reinforced the existing legislation on disconnections both for the electricity and gas market, asking Member States to take appropriate measures to prevent disconnections for vulnerable customers and customers affected by energy poverty.

As part of the Package, the Commission will publish guidance on transposition of article 28a of the Electricity Market Directive and Article 28 of the Gas Directive Recast which both legislate on protection from disconnection for vulnerable and energy poor customers.

01. What measure or practice do you consider effective to prevent disconnection from electricity or gas of vulnerable customers and customers affected by energy poverty?

(Please rate according to importance)

	Very important	Important	Neutral	Less important	Not important	No opinion
Promoting voluntary codes of conduct or a charter for suppliers and customers <i>(arrangements may concern support for customers in managing their energy use and costs, including flagging unusual high energy spikes or use in winter and summer seasons, offering appropriate flexible payment plans, debt advice measures, self-metering readings, and improved communication with customers and support agencies)</i>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Promoting customers' education and awareness (e.g. through one-stop-shops or advisory points)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Access to finance, vouchers or subsidies	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Encouraging and facilitating the provision of meter readings	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Targeted energy tariffs/allowances for vulnerable consumers	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Structural measures to address the root causes of energy poverty (e.g., building renovations, energy efficiency measures, access to renewable energy sources, etc.)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please, use this space if you wish to point out other effective measures/practices to prevent disconnection from electricity or gas of vulnerable customers and customers in energy poverty

2000 character(s) maximum

02. Which actions/measures could be most effective in preventing customers from accumulating debt?

(Please rate according to importance)

	Very important	Important	Neutral	Less important	Not important	No opinion
Transparency and clear communication about energy consumption, costs, and payment obligations	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Regular billing and payment reminders	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Flexible payment plans taking into account the customer's income and expenditure	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Debt counselling or energy efficiency advice to help consumers manage their energy costs and consumption	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Targeted financial support or coverage/ subsidies/ energy cheques provided by local /regional/national authorities	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please, use this space if you wish to point out other effective measures/practices to prevent customers from accumulating debt

2000 character(s) maximum

03. Please, share any relevant best practice on protection of vulnerable customers and customers affected by energy poverty from electricity and gas disconnections and from debt accumulation.

5000 character(s) maximum

Section 2 on Consumer Empowerment

3. On Energy Communities

Energy communities are legal entities that empower citizens, small businesses and local authorities to produce, consume and sell their own energy. These can cover various parts of the energy value chain, including production, distribution, supply, consumption and aggregation. These vary depending on their location, actors and energy services. Energy communities enable citizens to access low-cost renewable energy by owning production installation, and access information on increasing energy efficiency in households – helping consumers gain control of their bills. Energy communities benefit from an EU framework in the Electricity Market Directive (EU) 2019/944 and Renewable Energy Directive (EU) 2018 /2001).

01. How can the Commission support the realisation of the objectives of energy communities?

(Please rate according to importance)

	Very important	Important	Neutral	Less important	Not important	No opinion
Awareness raising	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Legislation	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Capacity building support	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Funding	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

For 'Other', please specify:

2000 character(s) maximum

Recommendation 9 of the Citizens' Panel on Energy Efficiency highlighted that more information and financial support are needed to help EU citizens develop energy communities based on energy efficiency. First of all, the Commission should support the enforcement of the existing EU legislative framework on energy communities, as some Member States still struggle to accurately implement it. This can lead to corporate capture, misuse of public funds, or a lack of an enabling framework. The Commission could establish a platform to share knowledge and expertise between different levels of government and federations of energy communities to support national authorities in their implementation efforts. The Commission should also support integrated guidance and funding models that enable energy communities to combine renewable generation with neighbourhood-scale demand reduction measures — such as insulation or heating system upgrades — particularly in multi-family buildings. This would enhance both the technical viability and social equity of energy communities, especially in energy-poor districts. Reducing energy demand within energy communities is essential to make shared renewable generation and flexibility financially viable. Many energy communities are facing barriers to accessing banks and receiving loans. Raising awareness in the banking sector about the structure and role of energy communities is needed to increase the trust and reliability of these projects. Dedicated reforms would allow for further implementation of an enabling framework for energy communities, such as through simplified permitting and facilitated public procurement rules. Reaching these objectives would be simplified if energy communities could benefit from OSS support. Such OSSs already exist in some regions of Europe but should be further supported. Having OSSs that offer technical, legal, financial, and administrative services for free is a enabling factor for energy communities

02. Would you find it useful if the Commission provides guidance to the EU Member States on the following:

Maximum 6 selection(s)

- ☒ Permitting and licensing
- ☒ Access to financing and information
- ☒ Access to markets
- ☒ Public procurement
- ☒ Other
- ☐ None of the above

Please explain your answer.

1500 character(s) maximum

The Commission should fulfill its role as Guardian of the Treaties, and ensure a full implementation of the existing legislation on energy communities, particularly regarding the transposition of its definitions and enabling framework.

03. Are there any good practices that you think would be useful to highlight in such a guidance?

5000 character(s) maximum

In access to financing, it is very important to open the banking sector to citizen initiatives that usually struggle to access bank loans. Energy communities struggle with the lack of access to capital or investment and to tailored financial products (e.g., microloans, cooperative investment schemes). They also have difficulty accessing bank financing due to the small-scale, citizen-led, or sustainable nature of the project and the lack of interest in non-profit and community-based business models and awareness about energy community business model. A good practice in public procurement is when regional energy agencies play an enabling role in supporting energy communities, by directly managing or designing procurement processes or by advising municipalities on how to set up energy communities. While only a few of these agencies are active in this area, most see strong potential for future engagement. The same goes for permitting and licensing, these agencies are well placed to support energy communities. This includes support to all actors that may find themselves in such a project, ranging from local authorities, citizens and SMEs. In this spirit, many of these regional energy agencies, as well as cities, associations or federations of energy communities, now operate as a one-stop shop for energy communities.

04. Would you find it useful if the Commission includes a political objective in the Communication in relation to:

(Select topics you agree with)

Maximum 5 selection(s)

- ☐ Number of energy communities per municipality
- ☐ Total installed renewable energy capacity by energy communities
- ☐ Number of citizens engaged in energy communities
- ☐ Other
- ☐ None of the above

4. On Active Customers and Energy Sharing

With the introduction of a right to energy sharing in the Electricity Market Directive (EU) 2024/1711, households, businesses and public bodies can share self-produced renewable energy directly between each other without the need for a supply license. This practice empowers consumers to collectively operate or use renewable energy systems and access the generated electricity at affordable rates.

01. In relation to energy sharing, would you find it useful if the Commission provides guidance on:

(Please rate according to importance)

	Very important	Important	Neutral	Less important	Not important	No opinion
Data management	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Consumer protection	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Single point of contact	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Energy sharing organiser	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Involvement of energy poor and vulnerable households	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

For 'Other', please specify:

2000 character(s) maximum

02. Are there any good practices that you think would be useful to highlight in such a guidance?

5000 character(s) maximum

03. Do you consider there is a need for an implementing act on data interoperability for energy sharing?

- ☐ Yes
- ☐ No

5. On Demand Flexibility Remuneration in Retail Contracts - dynamic and hybrid contracts

Demand flexibility should be actively promoted in the retail market with offers that provide lower prices for industries, and consumers who choose to participate. As part of its commitment to energy affordability and flexible market participation, the Affordable Energy Action Plan mandates the Commission to develop guidance for promoting the remuneration of flexibility in retail contracts. This aims to boost consumer engagement by incentivising adjustments in energy usage that align with supply and demand dynamics. To ensure broad participation, it is important that these incentives are clear, understandable, and financially attractive for consumers to opt in. Furthermore, increasing consumer participation involves providing them with a range of choices and equipping them with the necessary tools and information to make educated decisions about their energy behaviour, thereby safeguarding their interests as they navigate an increasingly complex energy market.

01. What do you consider as benefits and challenges regarding the integration of demand flexibility into the retail energy market through flexible supply contracts (e.g., hybrid, dynamic pricing, time-of-use contracts)?

(Please rate according to importance)

Benefits - Challenges	Very important	Important	Neutral	Less important	Not important	No opinion

<u>Benefit:</u> Lower electricity costs for consumers	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<u>Benefit:</u> More efficient management of the system and lower prices overall	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<u>Benefit:</u> Better integration of renewable energy sources	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<u>Benefit:</u> Improved grid stability	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<u>Benefit:</u> Increased consumer engagement and awareness, leading to better energy management	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<u>Benefit:</u> Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<u>Challenge:</u> Lack of smart metering infrastructure	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<u>Challenge:</u> Insufficient regulatory framework	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<u>Challenge:</u> Lack of standards or guidelines for dynamic or hybrid energy supply contracts	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<u>Challenge:</u> Absence of dynamic or hybrid energy supply contracts	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<u>Challenge:</u> Inconsistent regulatory approaches and national practices across the EU	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<u>Challenge:</u> Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Benefit: For 'Other', please specify:

2000 character(s) maximum

Challenge: For 'Other', please specify:

2000 character(s) maximum

02. What measures or actions are most important for promoting demand flexibility in retail markets?

(Please rate according to importance)

	Very important	Important	Neutral	Less important	Not important	No opinion
Offering financial incentives or rewards for consumers participating in demand flexibility programmes	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Developing user-friendly digital tools and platforms for real-time energy management	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Enhancing the access to smart meter data and automation to support flexible consumption	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Ensuring that the regulatory frameworks support fair remuneration of flexibility and consumer protection	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Providing regular, transparent communication about the benefits and risks of flexible supply contracts, alongside educational campaigns to improve consumer awareness and understanding of such contracts	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Facilitating collaboration between different stakeholders to ensure an efficient and competitive flexibility market	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

For 'Other', please specify:

2000 character(s) maximum

03. What measures or commercial practices could be in place to protect consumers from excessive risks associated with price volatility in flexible supply contracts?

(Please rate according to importance)

	Very important	Important	Neutral	Less important	Not important	No opinion
Introducing price limits to contain costs during excessive price peak periods	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Offering hybrid contracts that blend fixed and dynamic pricing for balance and predictability	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Ensuring availability of 'safety net' features such as guarantees or insurance against price spikes	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Promoting access to real-time consumption data through smart meters to enable informed usage decisions	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Implementing clear, simple, and accessible contract terms and conditions	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Providing comprehensive information of the opportunities, costs and potential risks, and applying techniques to identify final customer's preferences (e.g. risk profile assessment)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Offering comparison tools that help consumers evaluate different contract options	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Encouraging the development of risk-sharing mechanisms between consumers and suppliers	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

For 'Other', please specify:

2000 character(s) maximum

Section 3 on Consumer Protection, Affordability and Public Acceptance

General questions

01. What actions are needed at EU, national and local level and by whom to raise awareness about consumer protection, rights and opportunities for consumers to engage in the energy transition? Are you aware of any good practices?

5000 character(s) maximum

As already mentioned above, the implementation of existing legislation is paramount to raise awareness among consumers on their opportunities to engage in the energy transition. Specifically, the implementation of the provisions on information and awareness raising in EED Article 22 and EPBD Article 18 related to the creation of one-stop shops will enable consumers to be more aware of their energy rights and possibilities and therefore be better equipped to take actions related to their energy use. Such legislative provisions echo the first recommendation of the European Citizens' Panel on Energy Efficiency which suggests that "information provided to consumers be made more accessible, transparent, and usable, to empower households and organisations to become more energy efficient". The panel proposes, for instance, an online portal with a self-audit function, a network of physical one-stop-shops at municipal level and more accessible energy efficiency labels on products. Another element to improve the engagement of consumers in the energy transition is to facilitate information about their individual energy consumption in real time or frequently, providing insights on consumption data and how to optimise it using energy efficiency technologies and services. However, to bridge the first gap of awareness raising, information campaigns should be organised at all levels (EU, national and local) to highlight the benefits of energy efficiency solutions. In addition to awareness, these campaigns should be followed by personalised and tailored advice while making the link with the opportunities available to implement these technologies. This is a pre-requisite to ensure sustainable behaviour change and the

continued uptake of energy efficiency solutions. For instance, an EU Peers LIFE Project aims at creating a European community of One-Stop Shops for energy renovation, ensuring that awareness measures can be directly linked to tailored advice and acted on to unlock their energy efficiency potential.

02. Are there any specific areas (e.g. clarity of energy bills, unfair commercial practices, peer-to-peer trading) where you believe the EU could further focus to increase consumer protection and engagement in the energy market? If so, which areas should be prioritised?

5000 character(s) maximum

03. Do you think that additional measures are needed to enhance public acceptance of renewables in the EU?

- ☐ Yes, new or additional measures are needed.
- ☐ No, existing rules and recommendations are sufficient and it is more important to focus on their implementation.

04. What type of interventions would be more effective in involving citizens and enhancing public acceptance of renewables in your view?

(Please rate according to importance)

	Very important	Important	Neutral	Less important	Not important	No opinion
Indirect financial participation (benefit sharing) e.g. job creation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Direct financial participation e.g. buying stakes in the project, financing for local communities (municipalities, citizens)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Promoting communities' participation in renewable energy projects e.g. through the inclusion of measures to foster public acceptance in renewables auctions criteria	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Communication measures e.g. education and information campaigns	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Early engagement of citizens and involvement in the decision-making process	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

For 'Other', please specify:

2000 character(s) maximum

05. What do you believe are the main retail challenges for affordable energy in your Member State?

Maximum 3 selection(s)

- ☐ High retail prices
- ☐ Limited access to renewable energy options
- ☐ Lack of (competitive) offers
- ☐ Lack of access to smart solutions (e.g. smart meters, smart appliances and/or aggregators)
- ☐ Lack of information or awareness about energy-saving options
- ☐ Other

For 'Other', please specify:

2000 character(s) maximum

6. Ensuring energy offers are easily understandable and comparable

Due to the increasing complexity of energy offers, consumers often find it difficult to fully understand the implications of suppliers' offers. Therefore, they should be provided with a summary of the key contractual terms and conditions in a prominent manner and in clear and concise language. The European Commission was tasked to provide guidance to Member States on a summary of the key contractual terms and conditions in both electricity and gas markets.

01. What are the key principles that should guide the presentation of energy offers to ensure consumers receive all necessary information in a user-friendly format and in a timely manner?

(Please rate according to importance)

	Very important	Important	Neutral	Less important	Not important	No opinion
Clear and simple language	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Visually appealing design and layout	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Timely presentation of information	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Easy comparison of different energy offers	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Personalization of information to individual consumer needs	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Accessibility of information across different communication channels	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Use of concise and straightforward terminology	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

For 'Other', please specify:

2000 character(s) maximum

02. Which is the most important information on an energy offer that should be prominently displayed to consumers?

	Most important information on an energy offer?
1	
2	
3	
4	
5	

03. Have you identified good practices regarding a summary of key contractual terms and conditions and/or other tools providing consumers with information on energy offers in a user-friendly format allowing easy comparison? Please elaborate.

5000 character(s) maximum

7. On Limiting Risk of Supplier Bankruptcies

'Supplier Hedging' relates to the purchasing strategy of suppliers on the wholesale market. When suppliers do not ensure that their electricity portfolio is sufficiently hedged, changes in wholesale electricity prices can leave them financially at risk and can result in their failure and them passing on costs to consumers and other network users. Hence, suppliers should be appropriately hedged when offering fixed-term, fixed-price electricity supply contracts. In short, suppliers need to buy the electricity provided to you sufficiently in advance to protect against price hikes.

Article 18a of Directive 2024/1711 aims to ensure that National Regulatory Authorities enforce that suppliers have in place and implement appropriate hedging strategies.

01. Which elements of article 18a EMD are important to clarify further?

(Please rate according to importance)

	Very important	Important	Neutral	Less important	Not important	No opinion
Definitions	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Legal implementation Member States	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Implementation/enforcement National Regulatory Authorities	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Further considerations on types of risks for suppliers	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Best practices by NRAs	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Any other elements or comments you think are important to highlight? Please elaborate.

2000 character(s) maximum

8. On Consumer Protection in Natural Gas Phase-out

Phasing out the use of natural gas in the household sector may be part of national, regional or local energy transition plans. If this is the case the consumers and especially energy poor and vulnerable consumers, need to be protected and supported to ensure that they do not suffer negative consequences. In accordance with the requirements of article 27 of the recast EU Directive on gas and hydrogen markets (2024/1788), the Commission is preparing guidance on principles and good practices that would apply after a decision has been made, in order to make the process of a natural gas phase-out consumer-focused, just and inclusive.

01. What are the main concerns for households when phasing-out natural gas?

(Please rate according to importance)

	Very important	Important	Neutral	Less important	Not important	No opinion
Lack of alternatives to natural gas for heating and cooking	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Higher energy bills	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Lack of financial resources to invest in alternative heating sources	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Complexity of access to funding or financing	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Inconvenience of works for renovation and/or installation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Uncertainty/absence of national/regional/local plans and timelines for phasing out natural gas	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Lack of information on plans and concrete actions to take	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
No availability of companies or workers for the installation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Difficult to take action for a rented home	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Difficult to take action in a multi-apartment building	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

For 'Other', please specify:

2000 character(s) maximum

Please use this space if you wish to elaborate on the main concerns you have identified (explanations, suggestions, etc.)

2000 character(s) maximum

02. What types of support will be essential for citizens, notably vulnerable customers and customers affected by energy poverty, to assist them in the phase-out of natural gas in their homes?

	Very important	Important	Neutral	Less important	Not important	No opinion
Clear and comprehensive information (what to do)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Practical advice (how to do it)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Financial advice (how to pay for it)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Financial support (grants, subsidies, loans, etc)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Fully developed packages of solutions (someone does it for you)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Support to bundle individual projects for joint purchasing or contracting (do it together to get a better deal)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

For 'Other', please specify:

2000 character(s) maximum

03. Do you know of best practice examples where natural gas has already been phased out with a focus on consumers such as by involving consumer collectives, consumer organisations, national or local administrations, energy regulatory authorities, or other local actors? If yes, please describe briefly.

3000 character(s) maximum

Contact

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