

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

Martin

* Surname

Kaspar

* Email (this won't be published)

martin.kaspar@thuega.de

* Organisation name

255 character(s) maximum

Thüga AG

* 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.

702152628415-31

* 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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| <input type="radio"/> Denmark | <input type="radio"/> Liberia | <input type="radio"/> Saint Lucia | |

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

- At EU level: the existing framework is sufficient; an EU-wide binding definition is neither necessary nor helpful, since situations vary across Member States. Nevertheless, the existing provisions on vulnerable customers and energy poverty need to be harmonized / more coherent across the Electricity- and the Gas Market Directives, the EED and EPBD as well as the Regulation on the Social Climate Fund in order to prevent different "categories" of vulnerable customers and their respective application. - At National level: Member States need to transpose the revised Directives of the Fit4-55-Package; the care for vulnerable customers should best be dealt with via state subsidies, especially via the Social Climate Fund. Governments should develop holistic energy poverty strategies that combine subsidies, i.e. energy vouchers, temporary premiums, retrofitting grants, and debt counselling services. It can and should not be the task of the utility company / energy provider to be tasked with assessing, which kind of (protected) customer is behind an energy connection. To ease the process, Member States could create and maintain a national registry of vulnerable customers and energy-poor households to ensure targeted assistance.

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 type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Effective identification of vulnerable and energy poor consumer	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Lack of energy efficiency in housing	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Limited access to renewable energy	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Income inequality	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Insufficient awareness and education about energy-saving measures and available assistance programs	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Inadequate financial support schemes	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Lack of political will	<input type="radio"/>	<input type="radio"/>	<input checked="" 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 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

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

- ☐ Yes
- ☒ No

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 checked="" 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 checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Access to finance, vouchers or subsidies	<input checked="" 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 checked="" 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 checked="" 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 checked="" 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

- Instead of energy tariffs, which would put at risk market dynamics, and in line with the EMD, vulnerable customers and energy poor households should be supported through public subsidies, vouchers, etc.; - For timely support, a timely process at the respective national social security system is of the essence, as an important basis to prevent moratoria and / or ban on disconnection.

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 checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Regular billing and payment reminders	<input checked="" 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 checked="" 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 checked="" 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 checked="" 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

It should be the role of the supplier to assist customers who proactively seek help and/or to prevent aid measures via payment reminders and/or monthly instalments plans (however, deferring payments obligations / moratoria should not be used as an instrument as it would result in accumulating debt); if these measures are unsuccessful it is the duty of national authorities and/or consumer protection agencies to provide further help; it helps, if data protection laws allow for easy / low barrier transparency between customer, supplier and consumer protection agency.

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

In Germany §41b EnWG / §19 Strom GVV provide the legal basis for a forced disconnection, with different degrees of pre-requisites needed to be fulfilled for a "regular" supplier and the "supplier of last resort". Disconnections in the first case (regular supplier) requires only the non-payment of the bills as a pre-requisite. In the latter case (supplier of last resort), several pre-requisites need to be fulfilled to allow for a forced disconnection (setting suitable deadlines to allow for getting assistance from the state); a disconnection must furthermore be proportional. Jurisdiction has set some criteria, where a disconnection is usually seen as disproportional has been collected in "Hempel/Franke, Recht der Energie- und Wasserversorgung, § 33 AVBEltV Rdnr. 168ff."

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)

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

digitalization

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

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

5000 character(s) maximum

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 checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Consumer protection	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Single point of contact	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Energy sharing organiser	<input type="radio"/>	<input checked="" 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 checked="" 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

The Commission should provide for clear standards and rules on data management; consumer protection is also relevant from the perspective of the use of data and its distribution in market communications (impact on "permissions")

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

5000 character(s) maximum

In Germany, Directive 2024/1711 is currently being implemented into national law. The results of this should first be evaluated, and then a review should be carried out to determine whether further measures are necessary. In general, the use of standards is a best practice and should be considered.

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 checked="" 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 checked="" 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 checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<u>Benefit:</u> Improved grid stability	<input checked="" 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 checked="" 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						
<u>Challenge:</u> Insufficient regulatory framework						
<u>Challenge:</u> Lack of standards or guidelines for dynamic or hybrid energy supply contracts						
<u>Challenge:</u> Absence of dynamic or hybrid energy supply contracts						
<u>Challenge:</u> Inconsistent regulatory approaches and national practices across the EU						
<u>Challenge:</u> Other						

Benefit: For 'Other', please specify:

2000 character(s) maximum

One needs to differentiate between different consumer profiles; between (energy intensive) industries, public and commercial consumers and private consumers in general as well as more specific profiles. Whilst i.e. an industrial consumer with a chloralkali or on with a glass melting process is physically challenging and economically almost impossible to flexibilize, (non energy intensive) commercial consumers usually have the physical ability to flexibilize but face economical and other challenges (i.e. predictable / plannable and labour-law-abiding working schedules). Whilst a hospital could in theory flexibilize its demand, it should be common sense that this might not be a desirable solution. On the other hand, (public) offices are probably able to flexibilize with the right price signals for batteries. Whilst active prosumers with an EV and heat-pump might be perfect examples to flexibilize their respective demands, other customers might not be able - or simply do not want to - flexibilize. Hence, there is no one-size-fits-all-approach. Every consumer group needs to be approached in a dedicated and tailored way to tap into and maximise their engagement potential, without imposing contracts on them. Hence, well-informed consumers should be allowed to decide which contract fits their risk profile and aligns with their preference to engage with price signals.

Challenge: For 'Other', please specify:

2000 character(s) maximum

The text rightly highlights the promotion of demand flexibility and consumer participation, primarily addressing the market dimension of flexibility, i.e. aligning consumption with generation patterns. However, it is important to acknowledge the potential trade-off between generation-driven flexibility and grid-related flexibility. While market incentives encourage consumers to shift demand towards periods of high generation, such shifts may locally or regionally increase grid stress, thereby intensifying the need for grid reinforcement or stabilisation measures. To resolve this conflict, market signals must be harmonised with grid-oriented steering mechanisms. Only through an integrated approach that considers both generation and grid perspectives can flexibility deliver benefits for market efficiency while also safeguarding system security.

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 checked="" 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 checked="" 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 checked="" 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 checked="" 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 checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Facilitating collaboration between different stakeholders to ensure an efficient and competitive flexibility market	<input checked="" 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 checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Offering hybrid contracts that blend fixed and dynamic pricing for balance and predictability	<input checked="" 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 checked="" 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 checked="" 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 checked="" 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 checked="" 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 checked="" 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 checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

Other



For 'Other', please specify:

2000 character(s) maximum

In general, there should not be any legal obligation going this detailed into market products as in Art. 11 EMD; this undermines the Freedom of contract principle and distorts competition, leading to higher prices for all consumers. However, given that the institutions have chosen to provide for such a provision, "Hybrid contracts", combining fixed and dynamic pricing elements (cf. "offres cliquables" in France) could encourage residential consumers to respond to price signals while still guaranteeing a baseline electricity supply at a stable cost. It should in the end be the choice of the supplier, if he wants to provide for such a contract. It is then the free choice of the consumers to choose the contract (and supplier) best fitting his/her personal needs.

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

Keep the energy trilemma balanced between security of supply, decarbonisation and affordability. Consumers need to be able to proactively choose solutions that align with their specific needs and constraints. To support this, consumers should be provided with clear, transparent information about the available options. Regulatory stability - especially when dealing with market instruments such as the ETS I and II - are essential to allow for decisions where an economic choice is also the ecological choice.

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

The regulatory framework for consumer protection, both sectoral and horizontal, has become broad and comprehensive. Efforts should now focus on national implementation. Existing instruments (such as REMIT) need to be used and the market entry of "dubious providers" needs to be monitored by the respective national regulator.

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 checked="" 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 checked="" 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 checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Communication measures e.g. education and information campaigns	<input type="radio"/>	<input checked="" 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 checked="" 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

Whilst the production costs for Renewable Energies are already lower than non-renewable alternatives (especially for PV, Wind and Water), they still lead to higher retail prices, due to the necessary electricity grid expansion. Other renewable options (green gases) usually have higher production costs but lower network tariffs. In the end, it is usually only the retail price (including all cost elements) that is interesting to the customer.

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 checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Visually appealing design and layout	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Timely presentation of information	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Easy comparison of different energy offers	<input checked="" 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 checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Accessibility of information across different communication channels	<input type="radio"/>	<input checked="" 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 checked="" 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

The complexity of pre-contractual information is based mainly on legal requirements. Furthermore simplicity usually comes along with higher costs while potentially more affordable energy contracts (incl. demand-side-felxibility) are oftentimes more complex by definition. This dilemma can be adressed, but not solved. As with bank / stock exchange products, customers should not buy, what they do not understand. Attention must also be given to third-party platforms (comparison tools, intermediaries) that are not regulated as energy actors. This legal gap should be addressed to ensure a level playing field with supplier-operated platforms for comparing energy offers.

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	Final Price (€/kWh and €/month): The total cost, including all taxes, regulated charges, etc., as well as discounts; the final average price for an estimated consumption is helpful
2	Contract Duration and Renewal Conditions: Clear indication of the length of the contract and what happens at the end (e.g. automatic renewal, new conditions, information about price revisions)
3	Type of Tariff: Whether it is a fixed, variable, or time-of-use tariff (for electricity)
4	Additional Services or Bundled Offers: Any extra services (e.g. maintenance, insurance) included or optional, with their costs clearly separated.
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

It is almost impossible to compare dynamic electricity price contracts with fixed-price electricity supply contracts or hybrid solutions. Growing complexity leads by nature towards less comparability.

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 checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Legal implementation Member States	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Implementation/enforcement National Regulatory Authorities	<input checked="" 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 checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Best practices by NRAs	<input type="radio"/>	<input checked="" 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

Germany is currently transposing Art. 18a EMD into national law. It is important that the potential requirements for hedging strategies do not hinder different types of hedging strategies (as long as they provide for the result).

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 checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Higher energy bills	<input type="radio"/>	<input checked="" 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 checked="" 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 checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Inconvenience of works for renovation and/or installation	<input type="radio"/>	<input checked="" 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 checked="" 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 checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
No availability of companies or workers for the installation	<input checked="" 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 checked="" 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 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

Planability and predictability of the legal and political framework, incl. subsidies (also due to policy shifts after elections) and not yet available results of municipal heat planning; this can go along with investment attentism.

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

2000 character(s) maximum

The above mentioned set of criteria is very diverse for different households (i.e. depending on specificities of the region and building). Customers with low income and/or available funds are more likely to reside in the least energy-efficient buildings with the highest costs for efficiency measures. Even with subsidies, these high upfront costs often prevent these bulidings from deep renovations (if they are at all possible; i.e. in inner cities with historic buildings). Local authorities must plan accoring to their respective regional needs and framework , ensuring vulnerable groups are informed early about what changes are coming, why, and how they'll be affected. A one-size-fits-all, top-down solutions is therefore unsuitable and/or unaffordable. The gradual phase-out of natural gas must be aligned with efforts to phase in renewable and low-carbon gases as outlined in the REPowerEU Plan of 18 May 2022.

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 checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Practical advice (how to do it)	<input checked="" 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 checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Financial support (grants, subsidies, loans, etc)	<input type="radio"/>	<input checked="" 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 checked="" 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 checked="" 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

As is already set out in Article 13(1), point (d), measures should concentrate on the use of public funding and funding facilities established at Union level when decommissioning a gas grid and protecting (vulnerable) customers in that sense.

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

Under Germany's Heat Planning Act (Wärmeplanungsgesetz), municipalities are required to develop local heat plans and carry out public consultation as part of that process. When deciding to decommission parts of the gas grid (cf. Article 57 Gas-Directive), cities / utility companies are giving residents up to 10 years' notice. This long lead time enables consumers - particularly vulnerable groups - to plan financially ahead and switch to alternative systems (i.e. district heating) without undue pressure. The German consumer association vzbv has endorsed the 10-year advance notice as best practice. This model ensures local ownership, avoids lock-in effects, and supports fairness in the energy transition.

Contact

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