
Public Consultation on 2020 Work Programme

Contact details and treatment of confidential responses (520)

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Type: (/array-multi-flexi-text)

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Please, mark the box if you wish your response to be treaded as confidential. (7308)

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If you wish your reponse to be treated as confidential (7360)

PRIORITY AREAS (518)

1. CEER proposes that the 2020 Work Programme should focus on these priority areas:

Customers and retail markets; New legislative/policy developments; Distribution System Operation; and International work beyond the borders of EU. Do you support that these areas should be the priorities or should some areas be deleted and others included? (7300)

Type: (T/text-long)

Eurogas agrees that CEER should place the emphasis on continuity in its work programme priorities building on results achieved in previous years and assessing how these may be appropriately developed to contribute to the challenges of a fast-evolving energy market. Technological developments will bring more market solutions, and potentially a more complex energy market. This will not only involve changing business models for many market actors but new opportunities for customers to which different customers will likely respond differently, with differing levels of interest and involvement

All customers should benefit from market developments, and therefore CEER's work should support a framework that delivers on this objective, not only delivering benefits to prosumers, but ensuring a fair distribution of system costs. This will require tailored solutions for customers, among whom categories of vulnerable customers. Managing and setting a regulatory framework will face greater challenges.

Of the four priorities proposed by CEER Eurogas supports in particular the first three. Customers and retail markets, new legislative and policy developments and distribution system operation are closely linked, and a coherent approach will be essential supported by the pragmatic approach embedded in the 3 D strategy.

Eurogas stresses the continuing need to work through the various work streams towards an affordable and reliable energy market delivering a just energy transition.

Eurogas welcomes the work of CEER on low-carbon gases and sector integration ahead of the expected legislative package impacting gas. Eurogas is keen on participating in the follow-up work to the Future Role of Gas (FROG) study.

- Building on the previous work carried out by CEER, on the (FROG) Eurogas would welcome further work on several aspects (eg. clarifying the terminology of renewable gases), and particularly the clarification of the roles of and responsibilities of the market actors to enable them to harness the full potential of technological developments in the gas market.
- An emphasis on digitalisation and in particular the role of DSOs as well as aspects which can facilitate the

energy transition at the local level would be welcome. These evolutions would eventually have an impact on customers too, this link should be analysed.

- As decentralisation of energy production becomes increasingly relevant on the gas side, but also considering the evolutions regarding decentralisation of electricity production, an assessment of the evolving role and dynamics of distribution at the local level could be useful.

Eurogas also highlights its support for revisiting the CEER/BEUC' Vision on Customers. Reliability, affordability, simplicity and protection and empowerment should remain bedrock principles, but it is timely to evaluate if approaches need updated to reflect the ways in which the energy market have changed since 2012. Eurogas looks forward to engaging with CEER and other stakeholders on this exercise.

Eurogas also welcomes the focus on the implementation of the existing and recently adopted legislation. In this regard, Eurogas sees the monitoring activities of CEER in cooperation with ACER are essential. In this context, Eurogas welcomes CEER's encouragement to share good practices, which is in line with the aim of dynamic regulation. Related to the latter objective, which aims to ensure the resilience of the energy system to evolutions such as decentralisation and demand response, we wish to recall that any proposal in this regard should take into account the impact on the work of DSOs and keep at its heart the objective of safe and secure supply which lies at the core of DSOs public service mission.

Eurogas continues to support the PEER initiative and to advocate for the suppliers to be more involved.

Eurogas recognises that CEER's proposed fourth priority, international work, will bring value to countries ready to learn from European energy regulatory experience and dialogue will be useful. This work should certainly continue, subject to CEER's resource availability.

2. Within each priority area, do you think the Work Programme focuses on the right work items or should some be deleted or added, in particular to address properly the 3D Strategy themes of decarbonisation, digitalisation and dynamic regulation? (7309)

Type: (T/text-long)

Eurogas welcomes that the 2020 Work Programme tackles the challenge of decarbonisation through two specific angles:

- From a perspective of sector coupling that looks beyond the siloed gas/electricity system-based approach. Consideration of opportunities for convergence and innovative holistic approaches should build on FROG work that focused on infrastructure system interests and considerations. End-user relevant questions should be addressed, including the impact on competitive market structures of penetration of new types of gases.
- From a bottom-up perspective, looking at the next steps relevant to consumers in the efforts to decarbonise, especially their heating systems. The idea of cost-efficiency of solutions and ensuring an energy transition at least cost by building on existing infrastructure should also be at the core of any work undertaken by the CEER.

Digitalisation in the context of gas is an increasingly important challenge that the sector is facing, and digitalisation of the sector has already occurred to some level. Significant potential is there for smarter system operation and in the home. There is still room for further investigation on the role of digitalisation as an enabler for the injection of renewable and decarbonised gases and for an effective sector coupling. Eurogas supports any initiative by CEER that will look at the potential of digital solutions in gas, particularly with regard to customers' empowerment, affordability and competition. Cyber security should not be overlooked for gas and the development of legislation to this end should keep this in mind, all the while ensuring that the specificities of each system are taken into account.

On dynamic regulation, Eurogas is in line with CEER's focus on dynamic regulation; In a competitive and fast-moving energy world, regulation should not be prescriptive unduly rigid or incur cost burdens, as these could have adverse consequences for the market and inhibit innovation. A balanced approach is essential, allowing also for the importance of stability and predictability of the regulatory framework.

Eurogas supports continuing exploration of sandbox solutions determined according to transparent and coherent criteria. These could also help identify risks and opportunities from allowing certain activities to be performed by regulated entities and the conditions under which sandbox solutions would be accepted.

QUESTIONS ON INDIVIDUAL WORK ITEMS (525)

In total, there are 17 work items proposed in the draft CEER 2020 Work Programme divided into several areas: Customers and retail markets, Electricity, Gas, Distribution systems and Cross-sectorial. (7361)

Type: (X/boilerplate)

CUSTOMERS AND RETAIL MARKETS (519)

Work item 1: Title: Report on Innovative Business Models and Consumer Protection

Description: CEER will prepare a case study report on innovative business models looking at examples of aggregation, peer-to-peer trade and other innovative business models emerging in the energy sector and beyond. The challenges which may arise for consumer rights will be especially highlighted. 3D Strategy: Dynamic Regulation, Decarbonisation and Digitalisation a)

Please indicate if you consider this deliverable as "Very important", "Important" or "Not important". (7301)

Type: (!/list-dropdown)

A2 - Important

b) Do you intend to actively participate in a consultation, hearing, workshop, etc. if organised for this work item? (7302)

Type: (Y/yes-no)

Yes

c) Do you have any specific comment on this individual deliverable? (7303)

Type: (T/text-long)

Peer to peer trading and aggregation are more relevant for electricity. We could highlight issues for gas Citizens Energy Communities could be empowered and facilitated by innovative business models and projects developed by DSOs – the synergies could be showcased here.

Work item 2: ACER/CEER Market Monitoring Report on Consumer Empowerment and Protection in 2019 Description: The ACER/CEER Market Monitoring Report on Consumer Empowerment and Protection is an annual report which describes policies and measures applied in European energy markets. Based on 2019 data, the report will also monitor new developments in consumer empowerment and protection issues, providing a first European perspective on national transposition of the Clean Energy Package. Furthermore, the report aims to provide new detailed insights into European energy markets by exploring additional dimensions such as those identified in the CEER Roadmap to 2025 Well-Functioning Retail Energy Markets, or by investigating more closely the relationship between consumer empowerment and retail market properties, including the emergence of bundled products. 3D Strategy: Dynamic regulation a) Please indicate if you consider this deliverable as "Very important", "Important" or "Not important". (7304)

Type: (!/list-dropdown)

A1 - Very important

b) Do you intend to actively participate in a consultation, hearing, workshop, etc. if organised for this work item? (7305)

Type: (Y/yes-no)

Yes

c) Do you have any specific comment on this individual work item? (7310)

Type: (T/text-long)

Eurogas would support more monitoring of bundled products.
The work could explore whether some key metrics from the 2018 Roadmap to a well-functioning market.
The report should also look at the New Deal for Consumers Package.

Work item 3: CEER Monitoring Report on the Performance of European Retail Markets in 2019

Description: CEER will continue to develop its activities relating to the monitoring of the performance of retail markets on the basis of CEER National Indicators. The report analyses some of the most important aspects of retail markets, allowing a more in-depth and comprehensive understanding of their performance and evolution. It will take into account the results of work on indicators and metrics from the CEER Roadmap to 2025 Well-Functioning Retail Energy Markets as well as monitoring-related developments at European level (e.g. the various volumes of the ACER-CEER Market Monitoring Reports). 3D Strategy: Dynamic regulation a) Please indicate if you consider this deliverable as "Very important", "Important" or "Not important". (7311)

Type: (!/list-dropdown)

A1 - Very important

b) Do you intend to actively participate in a consultation, hearing, workshop, etc. if organised for this work item? (7312)

Type: (Y/yes-no)

Yes

c) Do you have any specific comment on this individual work item? (7313)

Type: (T/text-long)

Both deliverables should provide continuity with previous CEER work and should emphasise customer empowerment, which is part of CEER's National Indicators.

Work item 4: Billing - Contractual and Customer Information Following the Clean Energy

Package Description: CEER will work on billing in the context of the revised provisions in the Clean Energy Package and also cross-check changes in billing processes and billing information with the legislative provisions in the "New Deal for Consumers" legislative package.

3D Strategy: Dynamic regulation a) Please indicate if you consider this deliverable as "Very important", "Important" or "Not important". (7314)

Type: (!/list-dropdown)

A2 - Important

b) Do you intend to actively participate in a consultation, hearing, workshop, etc. if organised for this work item? (7315)

Type: (Y/yes-no)

Yes

c) Do you have any specific comment on this individual work item? (7316)

Type: (T/text-long)

As Eurogas considers billing and billing information are commercial tools in a competitive market, we avoid an over-prescriptive regulatory approach, creating a rigid framework (eg detailed template) on billing practices.

We consider the benefits of smart metering in improving consumption and billing information to consumers.

Work item 5: Digitalisation as a Driver for Better Retail Market Functioning Description: CEER will develop a position paper on digitalisation as a driver for better retail market functioning. This will include a reaction to the European Commission's EG1 (Smart Grids Task Force Expert Group 1) report on digitalisation and the EC study on digitalisation, as well as building on the results of CEER's 2019 Report on Digitalisation in the Consumer Interest. 3D Strategy: Dynamic regulation & Digitalisation a) Please indicate if you consider this deliverable as "Very important", "Important" or "Not important". (7317)

Type: (!/list-dropdown)

A2 - Important

b) Do you intend to actively participate in a consultation, hearing, workshop, etc. if organised for this work item? (7318)

Type: (Y/yes-no)

Yes

c) Do you have any specific comment on this individual work item? (7319)

Type: (T/text-long)

As digitalisation is a trend in the gas sector, we welcome a comprehensive approach, looking at it from the perspective of the consumer's interest. Digitalisation includes the installation of smart meters. The rollout of smart meters for gas faces is subject to different conditions than in the electricity sector. Eurogas emphasises on the importance of conducting an assessment of the costs and benefits of deploying smart meters for gas. If the conditions for such a deployment are in place, this technology can empower consumers and allow them to better manage their energy consumption.

Work item 6: CEER Workshop on Comparison Tools, New intermediaries and Dynamic Prices
Description: CEER workshop on Comparison Digitalisation allows dynamic price setting for energy to be applied to the smallest energy customers. New intermediaries are emerging using digital platforms and algorithms, impacting the choices energy consumers take. CEER will arrange a workshop to facilitate exchange experiences with other sectors on the impact of new intermediaries and dynamic prices on consumers and regulation. This work will be a part of the ongoing cooperation with other regulatory bodies (PEER). 3D Strategy: Dynamic regulation & Digitalisation a) Please indicate if you consider this deliverable as "Very important", "Important" or "Not important". (7320)

Type: (/list-dropdown)

A2 - Important

b) Do you intend to actively participate in a consultation, hearing, workshop, etc. if organised for this work item? (7321)

Type: (Y/yes-no)

Yes

c) Do you have any specific comment on this individual work item? (7322)

Type: (T/text-long)

The issue of dynamic pricing is relevant for gas in certain regions, depending on the balancing system. Eurogas agrees that from an energy retail market perspective, how dynamic prices are implemented as well as their impact on customer welfare and use of energy is very important. We welcome the organisation of a workshop open to industry stakeholders and would like to see more involvement of external parties into the PEER initiative. The decentralisation of energy production may also have an impact on balancing and therefore requires assessment related to the idea of dynamic pricing in gas.

Work item 7: Delivering the CEER-BEUC 2020 Vision for Europe's Energy Customers

Description: In 2012, CEER and BEUC launched their 2020 Vision for Europe's Energy Customers. This vision, supported by 17 major EU energy organisations, can be characterised by four principles governing the relationship between the energy sector and its variety of customers: reliability, affordability, simplicity, protection and empowerment (the so-called RASP principles). In 2020, CEER plans to launch a renewed reflection on delivering the principles in the Vision and will organise an event to discuss how the principles agreed in 2012 are being applied, and whether they should be reviewed in the light of the energy transition and major changes occurring (and expected) in the energy sector. 3D Strategy: Digitalisation a) Please indicate if you consider this deliverable as "Very important", "Important" or "Not important".

(7323)

Type: (!/list-dropdown)

A2 - Important

b) Do you intend to actively participate in a consultation, hearing, workshop, etc. if organised for this work item? (7324)

Type: (Y/yes-no)

Yes

c) Do you have any specific comment on this individual work item? (7325)

Type: (T/text-long)

Eurogas has signed up to the RASP principles and welcomes the initiative to review the principles in the light of the development of markets since 2012, Digitalisation also brings new considerations. Eurogas looks forward to cooperating in this process.

Work item 8: CEER Annual Customer Conference Description: CEER will organise its Annual Customer Conference. This serves as a forum for consumers, regulators, industry and policy makers to discuss EU policy issues related to customer protection and empowerment. 3D Strategy: Dynamic Regulation, Digitalisation & Decarbonisation a) Please indicate if you consider this deliverable as "Very important", "Important" or "Not important". (7326)

Type: (!/list-dropdown)

A1 - Very important

b) Do you intend to actively participate in a consultation, hearing, workshop, etc. if organised for this work item? (7327)

Type: (Y/yes-no)

Yes

c) Do you have any specific comment on this individual work item? (7328)

Type: (T/text-long)

Eurogas would like to see a focus on the gas market in the conference. This would be relevant to expected work in line with the upcoming gas package.

ELECTRICITY (521)

Work item 9: Regulatory Frameworks Report of European Energy Networks Description: This CEER annual report, previously known as the Investment Conditions Report, delivers a general survey about the implemented regulatory regimes, the demanded efficiency developments and analyses the overall determination of capital costs. In 2020, it will be the 8th edition of the report. The investment conditions report was for the first time made available to the public in 2016. 3D Strategy: Dynamic Regulation a) Please indicate if you consider this deliverable as "Very important", "Important" or "Not important". (7329)

Type: (!/list-dropdown)

A3 - Not important

b) Do you intend to actively participate in a consultation, hearing, workshop, etc. if organised for this work item? (7330)

Type: (Y/yes-no)

c) Do you have any specific comment on this individual work item? (7331)

Type: (T/text-long)

Work item 10: Biennial RES Status Review of Renewable Support Schemes in Europe

Description: CEER will make a status report that will form the latest update to the regular biennial CEER Status Review of Renewable Energy Support Schemes in Europe. These documents collect comparable data on RES support in Europe (e.g. by technology and support type). The 2020 RES Status Review will build on the previous editions published every other year. 3D Strategy: Decarbonisation a) Please indicate if you consider this deliverable as "Very important", "Important" or "Not important". (7332)

Type: (!/list-dropdown)

A3 - Not important

b) Do you intend to actively participate in a consultation, hearing, workshop, etc. if organised for this work item? (7333)

Type: (Y/yes-no)

c) Do you have any specific comment on this individual work item? (7334)

Type: (T/text-long)

GAS (522)

Work item 11: Gas Distribution Access and Tariffs Description: With the development of green gases, gas distribution is playing a new role in welcoming production facilities. This evolution is modifying the functioning of networks and will have to be translated within access rules and tariffs. The work will consist of a survey of distribution regulation in the EU with a particular view to existing arrangements regarding the injection of synthetic gases (including hydrogen). It will allow a comparison of the different orientations chosen and draw potential recommendations in line with the activities carried out on the future role of gas within a regulatory perspective. 3D Strategy: Dynamic Regulation & Decarbonisation a) Please indicate if you consider this deliverable as "Very important", "Important" or "Not important". (7335)

Type: (list-dropdown)

A2 - Important

b) Do you intend to actively participate in a consultation, hearing, workshop, etc. if organised for this work item? (7336)

Type: (Y/yes-no)

Yes

c) Do you have any specific comment on this individual work item? (7337)

Type: (T/text-long)

Eurogas welcomes this planned report; we believe it will be useful to highlight regulatory frameworks related to renewable and decarbonised gas developments. The balancing aspect mentioned in item 6 could also usefully be addressed here.

Work item 12: Regulatory Innovations for Electricity and Gas Sectors Coupling Description: CEER will explore which areas that would benefit from greater alignment/consistency towards an effective sector coupling between electricity and gas. Gas and electricity can converge on specific services for example energy storage and transmission in an innovative way where one could substitute to the other. The purpose is to investigate areas of convergence and associated regulatory challenges. 3D Strategy: Dynamic Regulation & Decarbonisation a) Please indicate if you consider this deliverable as "Very important", "Important" or "Not important".

(7338)

Type: (!/list-dropdown)

A2 - Important

b) Do you intend to actively participate in a consultation, hearing, workshop, etc. if organised for this work item? (7339)

Type: (Y/yes-no)

Yes

c) Do you have any specific comment on this individual work item? (7340)

Type: (T/text-long)

Eurogas will be happy to get involved in this work. Facilitating sector coupling will help the realisation of a least cost energy transition for consumers; innovative solutions to integrate gas and electricity system will be a cornerstone of this.

Work item 13: Future Role of LNG in Europe Description: CEER will engage, internally and with other stakeholders (mainly GLE, Eurogas, EFET), in a broader discussion about the future role of LNG in Europe. We will analyse the suitability of the regulatory framework in the context of an evolving LNG market, the implications of the competition between LNG terminals, with different regulatory regimes, the possible LNG market opportunities and threats, or the need for further coordination/cooperation among NRAs. CEER will also actively take into account relevant studies or regulatory development related to LNG, in particular in the gas package revision and in the EC study on LNG. 3D Strategy: Dynamic Regulation & Decarbonisation a) Please indicate if you consider this deliverable as "Very important", "Important" or "Not important". (7341)

Type: (!/list-dropdown)

A2 - Important

b) Do you intend to actively participate in a consultation, hearing, workshop, etc. if organised for this work item? (7342)

Type: (Y/yes-no)

c) Do you have any specific comment on this individual work item? (7343)

Type: (T/text-long)

DISTRIBUTION SYSTEMS (523)

Work item 14: Network Planning/Coordination Description: Following the Clean Energy Package, this CEER report could encompass how network plans may look like, including developments towards a more decentralised system and the TSO/DSO relationship. The deliverable may include a public workshop. 3D Strategy: Dynamic Regulation a) Please indicate if you consider this deliverable as "Very important", "Important" or "Not important". (7344)

Type: (!/list-dropdown)

A2 - Important

b) Do you intend to actively participate in a consultation, hearing, workshop, etc. if organised for this work item? (7345)

Type: (Y/yes-no)

Yes

c) Do you have any specific comment on this individual work item? (7346)

Type: (T/text-long)

Eurogas has consistently advocated for a joint TYNDP work between electricity and gas to ensure optimal planning and least cost solutions. Ensuring this planning includes the DSO level considering the decentralisation of energy production will be crucial.

Work item 15: Data Management and Smart Metering Description: The Clean Energy Package seeks to activate consumers through, for example, the right to form citizens energy communities and choose an independent aggregator. As of such, regulators will further explore how new products and services affect current regulation. Additionally, this deliverable may cover relevant topics from the CEER Digitalisation Conclusions Paper. 3D Strategy: Digitalisation a) Please indicate if you consider this deliverable as "Very important", "Important" or "Not important". (7347)

Type: (!/list-dropdown)

A2 - Important

b) Do you intend to actively participate in a consultation, hearing, workshop, etc. if organised for this work item? (7348)

Type: (Y/yes-no)

Yes

c) Do you have any specific comment on this individual work item? (7349)

Type: (T/text-long)

We would welcome clarification on this item and the issues that will be looked at specifically. Digitalisation supports the development of new services and products in the gas sector as well as the electricity sector. It affects the demand and the price elasticity in the gas market, and it can, if the conditions are in place, empower customers and improve energy efficiency and demand response. It also raises the same concerns in terms of exclusion of the “digitally poor”, data privacy and cyber security.

CROSS-SECTORIAL (524)

Work item 16: Monitoring Technological Trends in Energy Trading Description: CEER will monitor technological trends in energy trading to assess the extent to which new technologies are already reshaping, or might reshape in the near future, wholesale energy trading. Indeed, algorithmic or high frequency trading is already a reality in financial trading and has triggered regulatory action from financial regulators. Algorithmic and high frequency trading can also already be encountered in energy trading and NRAs with MPs and stakeholders should engage in discussions about the right way to monitor such trading, in particular from the REMIT obligations point of view. Moreover, recent developments in blockchain may enable in the near future new forms of peer-to-peer trading and the proposed deliverable and associated workshop may also give the opportunity to analyse the status quo and address the upcoming regulatory challenges of these technologies. 3D Strategy: Digitalisation a) Please indicate if you consider this deliverable as "Very important", "Important" or "Not important". (7350)

Type: (list-dropdown)

A2 - Important

b) Do you intend to actively participate in a consultation, hearing, workshop, etc. if organised for this work item? (7351)

Type: (Y/yes-no)

c) Do you have any specific comment on this individual work item? (7352)

Type: (T/text-long)

Work item 17: Report - Safeguarding the Independence of Regulators Description: The CEER Report on the Independence of Regulators will give insights from the European energy regulators on powers, resources, independence, accountability and transparency. The report will be an update of the 2016 Report on Safeguarding the Independence of Regulators. 3D Strategy: Dynamic regulation a) Please indicate if you consider this deliverable as "Very important", "Important" or "Not important". (7353)

Type: (!/list-dropdown)

A1 - Very important

b) Do you intend to actively participate in a consultation, hearing, workshop, etc. if organised for this work item? (7354)

Type: (Y/yes-no)

Yes

c) Do you have any specific comment on this individual work item? (7355)

Type: (T/text-long)

Eurogas welcomes this work.