

# 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

Marie

\* Surname

DENNINGHAUS

\* Email (this won't be published)

marie.denninghaus@edf-feph.org

\* Organisation name

255 character(s) maximum

European Disability Forum

\* 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.

57868523887-16

\* 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.*

- Afghanistan
- Åland Islands
- Albania
- Algeria
- American Samoa
- Djibouti
- Dominica
- Dominican Republic
- Ecuador
- Egypt
- Libya
- Liechtenstein
- Lithuania
- Luxembourg
- Macau
- Saint Martin
- Saint Pierre and Miquelon
- Saint Vincent and the Grenadines
- Samoa
- San Marino

- Andorra
- Angola
- Anguilla
- Antarctica
- Antigua and Barbuda
- Argentina
- Armenia
- Aruba
- Australia
- Austria
- Azerbaijan
- Bahamas
- Bahrain
- Bangladesh
- Barbados
- Belarus
- Belgium
- Belize
- Benin
- Bermuda
- Bhutan
- Bolivia
- Bonaire Saint Eustatius and Saba
- Bosnia and Herzegovina
- El Salvador
- Equatorial Guinea
- Eritrea
- Estonia
- Eswatini
- Ethiopia
- Falkland Islands
- Faroe Islands
- Fiji
- Finland
- France
- French Guiana
- French Polynesia
- French Southern and Antarctic Lands
- Gabon
- Georgia
- Germany
- Ghana
- Gibraltar
- Greece
- Greenland
- Grenada
- Guadeloupe
- Guam
- Madagascar
- Malawi
- Malaysia
- Maldives
- Mali
- Malta
- Marshall Islands
- Martinique
- Mauritania
- Mauritius
- Mayotte
- Mexico
- Micronesia
- Moldova
- Monaco
- Mongolia
- Montenegro
- Montserrat
- Morocco
- Mozambique
- Myanmar/Burma
- Namibia
- Nauru
- Nepal
- São Tomé and Príncipe
- Saudi Arabia
- Senegal
- Serbia
- Seychelles
- Sierra Leone
- Singapore
- Sint Maarten
- Slovakia
- Slovenia
- Solomon Islands
- Somalia
- South Africa
- South Georgia and the South Sandwich Islands
- South Korea
- South Sudan
- Spain
- Sri Lanka
- Sudan
- Suriname
- Svalbard and Jan Mayen
- Sweden
- Switzerland
- Syria

- Botswana
- Bouvet Island
- Brazil
- British Indian Ocean Territory
- British Virgin Islands
- Brunei
- Bulgaria
- Burkina Faso
- Burundi
- Cambodia
- Cameroon
- Canada
- Cape Verde
- Cayman Islands
- Central African Republic
- Chad
- Chile
- China
- Christmas Island
- Clipperton
- Cocos (Keeling) Islands
- Colombia
- Guatemala
- Guernsey
- Guinea
- Guinea-Bissau
- Guyana
- Haiti
- Heard Island and McDonald Islands
- Honduras
- Hong Kong
- Hungary
- Iceland
- India
- Indonesia
- Iran
- Iraq
- Ireland
- Isle of Man
- Israel
- Italy
- Jamaica
- Japan
- Jersey
- Netherlands
- New Caledonia
- New Zealand
- Nicaragua
- Niger
- Nigeria
- Niue
- Norfolk Island
- Northern Mariana Islands
- North Korea
- North Macedonia
- Norway
- Oman
- Pakistan
- Palau
- Palestine
- Panama
- Papua New Guinea
- Paraguay
- Peru
- Philippines
- Pitcairn Islands
- Taiwan
- Tajikistan
- Tanzania
- Thailand
- The Gambia
- Timor-Leste
- Togo
- Tokelau
- Tonga
- Trinidad and Tobago
- Tunisia
- Türkiye
- Turkmenistan
- Turks and Caicos Islands
- Tuvalu
- Uganda
- Ukraine
- United Arab Emirates
- United Kingdom
- United States
- United States Minor Outlying Islands
- Uruguay

- Comoros
- Congo
- Cook Islands
- Costa Rica
- Côte d'Ivoire
- Croatia
- Cuba
- Curaçao
- Cyprus
- Czechia
- Democratic Republic of the Congo
- Denmark
- Jordan
- Kazakhstan
- Kenya
- Kiribati
- Kosovo
- Kuwait
- Kyrgyzstan
- Laos
- Latvia
- Lebanon
- Lesotho
- Liberia
- Poland
- Portugal
- Puerto Rico
- Qatar
- Réunion
- Romania
- Russia
- Rwanda
- Saint Barthélemy
- Saint Helena
- Saint Kitts and Nevis
- Saint Lucia
- US Virgin Islands
- Uzbekistan
- Vanuatu
- Vatican City
- Venezuela
- Vietnam
- Wallis and Futuna
- Western Sahara
- Yemen
- Zambia
- Zimbabwe

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*

Existing legislation such as the Energy Performance of Buildings Directive have to be transposed ambitiously, and then enforced properly. Further legislation is needed to better protect consumers with disabilities in the energy markets and reduce energy poverty.

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 type="radio"/>            | <input checked="" type="radio"/> | <input 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 type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> |
| Income inequality   | <input checked="" type="radio"/> | <input 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 type="radio"/>            | <input type="radio"/>            | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" 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 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 checked="" 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

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*

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*

## 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<br><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 checked="" 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 type="radio"/>            | <input checked="" 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 checked="" 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 checked="" 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 checked="" 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*

Accessibility for persons with disabilities is equally important. Understanding your bills and contracts that you sign, and receiving those in accessible formats for example if you are blind or visually impaired are crucial to allow persons with disabilities to be treated equally as consumers.

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 checked="" 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 checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Flexible payment plans taking into account the customer's income and expenditure                                   | <input checked="" 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 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 checked="" 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

It should also be taken into account that persons with disabilities can have a higher-than-average energy consumption because of their disabilities, e.g. if they use assistive devices such as electric wheelchairs or respirators that need to be working 24/07. Many persons with disabilities also have higher heating costs because they need a stable room temperature to feel comfortable and reduce pain in some cases. Furthermore, persons with disabilities already often have higher household expenditures to accommodate their disability needs which means they have less money available for energy costs. For example if you have to rent a bigger apartment to be able to circulate with your wheelchair or because it is in a specific location, energy costs are also higher and the costs are disproportionate.

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 type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> |
| Legislation       | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> |

|                           |                       |                       |                       |                       |                       |                                  |
|---------------------------|-----------------------|-----------------------|-----------------------|-----------------------|-----------------------|----------------------------------|
| Capacity building support | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> |
| Funding                   | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> |
| Other                     | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> |

For 'Other', please specify:

*2000 character(s) maximum*

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 type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> |
| Consumer protection                                  | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> |
| Single point of contact                              | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> |
| Energy sharing organiser                             | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" 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 checked="" type="radio"/> |
| Other  | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" 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 checked="" 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 checked="" 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 checked="" type="radio"/> |
| <u>Benefit:</u> Improved grid stability  | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" 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 checked="" type="radio"/> |
| <u>Benefit:</u> Other  | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" 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 checked="" type="radio"/> |
| <u>Challenge:</u> Insufficient regulatory framework  | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" 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 checked="" 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 checked="" 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 checked="" type="radio"/> |
| <u>Challenge:</u> Other   | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" 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 checked="" 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 checked="" 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 checked="" 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 checked="" 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 checked="" 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 checked="" type="radio"/> |
| Other   | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" 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 checked="" 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 checked="" type="radio"/> |

|  |                                  |                       |                                  |                       |                       |                                  |
|--|----------------------------------|-----------------------|----------------------------------|-----------------------|-----------------------|----------------------------------|
| Ensuring availability of 'safety net' features such as guarantees or insurance against price spikes  | <input checked="" 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 checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/>            |
| Implementing clear, simple, and accessible contract terms and conditions   | <input checked="" 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 checked="" type="radio"/> |
| Offering comparison tools that help consumers evaluate different contract options  | <input checked="" 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 checked="" type="radio"/> |
| Other  | <input type="radio"/>            | <input type="radio"/> | <input type="radio"/>            | <input type="radio"/> | <input type="radio"/> | <input checked="" 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*

Better enforcement of existing legislation as well as new legislation that is fully inclusive of persons with disabilities and their needs and in line with the UN Convention on the Rights of Persons with Disabilities.

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*

Accessibility of information and improving choices for persons with disabilities.

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.

Should the additional measures be:

- Legislative
- Non-legislative

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 checked="" 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 checked="" 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 checked="" 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 checked="" 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 checked="" 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*

To better involve citizens with disabilities, accessibility and affordability are the keywords. Currently, persons with disabilities often do not have a free choice of services because they may have to choose the only one who provides bills in an accessible format (e.g. if you are blind or visually impaired, you cannot read paper bills and you need an accessible digital format). As mentioned above, the disproportionate cost of having a disability also means that choosing for renewables has to be affordable.

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*

Lack of accessibility.

## 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 checked="" 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 checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Timely presentation of information                                   | <input checked="" 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 checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Accessibility of information across different communication channels | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/>            | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Use of concise and straightforward terminology                       | <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

Accessibility is key here! All contracts need to be in easy-to-read format. This will benefit all consumers, not just those with intellectual or reading disabilities. Using simple language and providing information in alternative formats, e.g. also in a digital format for those who are visually impaired or blind.

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 checked="" type="radio"/> |
| Legal implementation Member States                         | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> |
| Implementation/enforcement National Regulatory Authorities | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" 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 checked="" type="radio"/> |
| Best practices by NRAs                                     | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> |
| Other  | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" 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 checked="" type="radio"/> |
| Higher energy bills  | <input checked="" 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 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 checked="" 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 checked="" 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 checked="" 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 checked="" 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 checked="" 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 checked="" 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 checked="" 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 a person with disability who already faces higher costs of living (on average), investing in alternative heating sources is not always an option. Many persons with disabilities would like to choose for more energy-efficient devices but often those are not accessible. The display might be too small, or only equipped with a touchscreen which is not accessible for many persons who are blind or visually impaired.

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 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 checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Financial support (grants, subsidies, loans, etc)   | <input checked="" 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 checked="" 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 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*

More accessible products and services, including information.

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**

ENER-B1-CONSUMER-TEAM-FMB@ec.europa.eu