

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

Fields marked with \* are mandatory.

## Introduction

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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

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\* 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

Arthur

\* Surname

Allier

\* Email (this won't be published)

arthur.allier@ufe-electricite.fr

\* Organisation name

255 character(s) maximum

Union of the French Electricity (UFE)

\* 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.

\* 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](#)

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### ***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*



To ensure a just transition and a successful electrification of uses, the protection of consumers should be at the heart of the EU action. UFE identifies seven types of priority actions:

- In general, ensure proper and timely implementation of the new Electricity Market design in the Member States.
- Ensuring competitive and predictable electricity prices for end consumers, notably by reducing the weight of taxation on electricity. To this end, UFE urges to finalise the revision of the Energy Taxation Directive (ETD).
- Implementing structural measures to address the root causes of energy poverty, notably through energy efficiency and sobriety measures which enable vulnerable consumers to reduce their energy consumption. In France, initiatives such as the Social Housing Fund and white certificates related to energy poverty can be considered best practice.
- Ensure payment of bills to prevent vulnerable consumers from accumulating debt, notably by providing payment facilities. In this context, energy vouchers (“chèques énergie”) in France are considered best practice. It is important to ensure that the energy voucher covers a meaningful portion of the average annual energy bill and that this level of support remains consistent over time, in order to maintain the scheme’s effectiveness and relevance for vulnerable households. To this end, a portion of the revenues generated from ETS 2 should be allocated to well-established and proven schemes such as the energy vouchers. In parallel, the creation of a specific “equipment voucher” dedicated to the installation of a heating control system could be envisaged to help further households managing their consumption and therefore their bills.
- Harmonising EU definitions of vulnerable consumers. The Commission uses different definitions of “vulnerable consumers”, or “vulnerable households”, in several legislative initiatives including the ETD. It is then needed to clarify and harmonise those definitions at EU level, to ensure consistent identification and protection. In this context, energy vouchers (“chèques énergie”) in France are considered best practice. However, the threshold of income to qualify vulnerable consumers should be left to Member States.
- Promoting consumer awareness and engagement in the energy market, enabling better management of their bills:
  - By enhancing the visibility and readability of existing contract offers and developing transparent and independent comparability tools. Authorities should ensure comparison tools contribute to customers’ information through clear display of scope and variables used for the comparison. As such, the French system of an independent comparator can be considered best practice.
  - By promoting and developing contracts that allow consumers to capitalise on their flexibility (e.g. dynamic and hybrid price contracts for business consumers). However, UFE warns against an overly restrictive definition of dynamic price contracts, as the one retained by the French NRA, which could undermine the appropriation by consumers and overall effectiveness of such offers.
  - By promoting Time-of-use tariffs that are effective and accessible tool to promote more responsible energy consumption. Enhancing their attractiveness—by increasing the price gap between peak and off-peak hours and limiting flat-rate offers—can strengthen consumer engagement and support flexibility in energy use.
  - By encouraging a more standardised presentation of offers (e.g., guidelines, or ‘lignes directrices’, from the French regulator), for instance through the harmonisation of practices and presentation formats, while ensuring that suppliers have the necessary space to innovate. The extensive energy legislation in France also provides a comprehensive framework for standardisation and the EU should not overturn it.
- Improve access to electrical solutions (heat pumps, electric vehicles, etc.). Although economic incentives have been put in place to encourage consumers to support electrification, these are often inadequate and not sufficiently targeted at the most economically vulnerable populations. EU funds, including revenues from the implementation of ETS 2, should be open for financing demand-side support mechanisms at the EU level, such as social leasing for electric cars or for supporting the installation of heat pumps.

## 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 checked="" type="radio"/>	<input type="radio"/>
Income inequality	<input type="radio"/>	<input type="radio"/>	<input checked="" 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 checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Inadequate financial support schemes	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Lack of political will	<input type="radio"/>	<input 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 type="radio"/>

For 'Other', please specify:

2000 character(s) maximum

Lack of demand-side support mechanisms for accessing electrical solutions (heat pumps, electric vehicles, etc.) targeted at the most vulnerable, to encourage consumers to take part in the energy transition.

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

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

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

3000 character(s) maximum

If priority must be given to the proper and timely implementation of existing EU legislation on energy poverty, notably of the new Electricity Market design and provisions on consumers' rights, additional measures are needed at EU level: • Harmonising EU definitions of vulnerable consumers. The Commission uses different definitions of “vulnerable consumers”, or “vulnerable households”, in several legislative initiatives including the ETD. It is then needed to clarify and harmonise those definitions at EU level, to ensure consistent identification and protection. In this context, energy vouchers (“chèques énergie”) in France are considered best practice. However, the threshold of income to qualify vulnerable consumers, should be left to Member States. • Adopt demand-side support mechanisms at EU level to improve access of the most vulnerable to electrical solutions (heat pumps, electric vehicles, etc.), such as social leasing or for supporting the installation of heat pumps. EU funds, including revenues from the implementation of ETS 2, should be open for financing these measures.

#### 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 checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Promoting customers' education and awareness (e.g. through one-stop-shops or advisory points)	<input type="radio"/>	<input 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 checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Targeted energy tariffs/allowances for vulnerable consumers	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Structural measures to address the root causes of energy poverty (e.g., building renovations, energy efficiency measures, access to renewable energy sources, etc.)	<input 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*

In general, priority should always be given to structural measures that address the root causes of energy poverty and vulnerability. Measures strengthening communication between suppliers and their customers are helpful. Yet it is crucial for the customers to proactively reach out the suppliers when facing difficulties as this enables them to provide timely support. In France, suppliers are required to implement a power reduction period of 60 days for certain households before disconnecting them for non-payment. During this period, the supplier is required to contact the customer at least twice—once by writing and once by phone—in order to seek an agreement on the payment of the outstanding bill. This mechanism frequently enables the identification of tailored solutions for the customer (e.g., payment deferrals, orientation towards available social support measures, etc.).

## 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 type="radio"/>	<input checked="" 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

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

The French legal framework is already very protective and numerous best practices exist to inform and protect the end consumers, particularly the most vulnerable, for instance: • Energy vouchers (“chèques énergie”), which prove to be effective in supporting financially vulnerable consumers at the national level. • Social Housing Fund (“Fond Social pour le logement”), which brings coordination and support at local level. • Measures for supporting consumers in managing their energy consumption. • Specific measures for consumers in situations of payment default. In order to maintain some good practices to tackle energy poverty, Member States should be allowed to continue to propose direct payment aids to provide support to specific populations.

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

Capacity building support	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input 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 type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input 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*

The guidance should address the risks of arbitrage by collective self-consumption operators and ensure a just distribution of obligations and responsibilities between all actors in the electricity market.

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 checked="" 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 type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Energy sharing organisor	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Involvement of energy poor and vulnerable households	<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*

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

*5000 character(s) maximum*

Any guidance from the EC should aim at ensuring an effective distribution of responsibilities related to site energy management between stakeholders. It is essential that this potential guidance leaves sufficient flexibility for MS to implement the most appropriate framework, adapted to their national context. In France, the strengthening of the regulatory framework has led to significative evolutions in favor of ES: as of June 2025, more than 1100 self-consumption installations are operational in France, twice more than a year ago. The mechanism in France provides substantial benefits for consumers, with DSOs playing a supporting role: • ES participants are regularly connected to the distribution grid, without any need to modify their installation. • One key principle is to guarantee that the network tariff design remains cost reflective. Applicable network losses, ancillary services charges, tariffs, fees, and levies must be paid by anyone using the public infrastructure to share this energy. • DSOs play a central role in accompanying energy sharing operations. In France, smart metering enables the certification of electricity flows shared between participants. Since 2018, Enedis has been providing data-sharing services for ES, and assists the initiation, the launch and the follow-up of every collective self-consumption operations. • ES should not create hidden cost transfers between different categories of consumers or between the different suppliers of a single customer, and should be treated fairly with other forms of electricity. The main supplier should be notified in advance when one of his customer enters an ES scheme, to ensure transparency. Suppliers should be able to manage imbalance risks and adapt their pricing in a transparent and proportionate manner. ES geographical and power limits should remain consistent with the lighter rules it benefits from, while allowing sufficient scale for meaningful consumers benefits.

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 checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<u>Benefit:</u> More efficient management of the system and lower prices overall	<input type="radio"/>	<input checked="" 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 checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<u>Benefit:</u> Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<u>Challenge:</u> Lack of smart metering infrastructure	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<u>Challenge:</u> Insufficient regulatory framework	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<u>Challenge:</u> Lack of standards or guidelines for dynamic or hybrid energy supply contracts	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<u>Challenge:</u> Absence of dynamic or hybrid energy supply contracts	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<u>Challenge:</u> Inconsistent regulatory approaches and national practices across the EU	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
<u>Challenge:</u> Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

**Benefit:** For 'Other', please specify:

*2000 character(s) maximum*

**Challenge:** For 'Other', please specify:

2000 character(s) maximum

Too restrictive definition of dynamic price contracts retained in France by the regulator: UFE emphasises that introducing an obligation for suppliers to offer dynamic price contracts does not necessarily guarantee consumer interest for such offers. The definition retained by the French regulator would only consider offers whose the price is indexed, for at least 50%, on one or more wholesale spot market price indices (daily or intraday market) and which reflect changes in these market prices at least on an hourly basis. Such restrictive definition would limit the consideration of offers whose understanding and appropriation by consumers or small businesses, and therefore overall effectiveness, appear uncertain. UFE considers that the qualification of a dynamic price contract should be granted solely based on the achievement of the objectives set out in Directive 2019/44, regardless of the nature and timing of the products on which it is based.

**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 type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Enhancing the access to smart meter data and automation to support flexible consumption	<input type="radio"/>	<input checked="" 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 checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Providing regular, transparent communication about the benefits and risks of flexible supply contracts, alongside educational campaigns to improve consumer awareness and understanding of such contracts	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Facilitating collaboration between different stakeholders to ensure an efficient and competitive flexibility market	<input type="radio"/>	<input 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"/>

For 'Other', please specify:

2000 character(s) maximum

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

	Very important	Important	Neutral	Less important	Not important	No opinion
Introducing price limits to contain costs during excessive price peak periods	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Offering hybrid contracts that blend fixed and dynamic pricing for balance and predictability	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Ensuring availability of 'safety net' features such as guarantees or insurance against price spikes	<input type="radio"/>	<input type="radio"/>	<input checked="" 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 checked="" type="radio"/>	<input 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 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 checked="" 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 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*

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### **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*

Overall, any actions at EU, national and local level should aim at accompanying and facilitating consumers in choosing the electricity offer that best suits their needs. Additional measures are needed, such as: • Creating the enabling conditions to increase the number of contract offers and pricing options available to consumers. • Enhancing the visibility and readability of existing contract offers and encouraging the emergence and development of fully transparent third-party platforms as well as transparent and independent tools to ensure better comparability of offers. • Maintaining support for the development of renewable energies, climate efficiency measures, self-consumption, and flexible consumption habits. • Channeling revenues from ETS 2 to fund decarbonisation measures, notably demand-side support mechanisms to access to electrical solutions (heat pumps, EVs etc.). These measures should neither restrict nor replace measures already implemented in some MS. It should only complement measures such as the French regulator (CRE) guidelines which already provide a good framework for clear and transparent communication towards customers.

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 Commission could draw on the experience of France, in the context of the French regulator (CRE) guidelines and the ban on unsolicited sales calls, without the consumer's consent. To take it a step further, UFE has adopted in 2024 a label on best practices for energy suppliers on Door-to-Door sales concerning supply contracts, aiming at providing better consumer protection. Each supplier participating in the labelling process commits to 13 commitments. An evaluation process ensures effective monitoring of compliance with these commitments, and may result in the withdrawal of the label in the event of non-compliance (more details here : [https://ufe-electricite.fr/wp-content/uploads/2024/07/UFE\\_Presentation-Label-Energie.pdf](https://ufe-electricite.fr/wp-content/uploads/2024/07/UFE_Presentation-Label-Energie.pdf)). Finally, the Commission should ensure that arbitrages related to collective self-consumption are not made at the expense of suppliers.

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 checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Direct financial participation e.g. buying stakes in the project, financing for local communities (municipalities, citizens)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Promoting communities' participation in renewable energy projects e.g. through the inclusion of measures to foster public acceptance in renewables auctions criteria	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Communication measures e.g. education and information campaigns	<input type="radio"/>	<input 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*

Long term regional planning from public authorities, stakeholders' consultation and participation of local communities in renewable energy projects through crowdfunding should help for social acceptance.

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*

• Beyond access to renewable energy solutions, the main retail challenge for affordable energy lies in ensuring access to decarbonised electricity, which plays a key role in protecting consumers from price volatility. Thanks to lower production costs and its independence from global commodity prices, decarbonised electricity enables the development of a sustainable, affordable, and secure energy system. • Another critical challenge is the high level of taxation on electricity. According to our internal estimates, in France taxes will account, on average, for one third of the total electricity bill in 2025. Reducing electricity taxation would improve the competitiveness of our companies, reduce household energy bills, while encouraging further investments in electrical solutions.

## 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 checked="" type="radio"/>	<input 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 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 checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Accessibility of information across different communication channels	<input type="radio"/>	<input checked="" 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

• Encourage a more standardised presentation of offers (e.g., guidelines, or 'lignes directrices', from the French regulator), for instance through the harmonisation of practices and presentation formats, while making sure suppliers have the necessary space to innovate. The extensive energy legislation in France also provides a comprehensive framework for standardisation and the EU should not overturn it. • To promote easy comparison of different energy offers, we call for the emergence and development of fully transparent and independent third-party comparison platforms, that are tailored to interpretate consumer needs with clear variables and scope of comparison.

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	Price
2	Type of offer
3	Price revision conditions
4	Contract duration and contractual terms (renewal, termination fees etc.)
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

All measures integrated in guidelines (or « lignes directrices ») from the French regulator, developed in close collaboration with stakeholders (energy ombudsman, suppliers, consumer associations etc.), can be considered best practices for providing information to end consumers.

## 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 checked="" 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 type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Best practices by NRAs	<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"/>

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

2000 character(s) maximum

Other elements of Article 18a EMD need to be clarified: • National implementation of the article should not restrict suppliers' freedom to define their hedging strategy and instruments, considering the expected consumption of their customer portfolio as well as their preferences and contract types, and does not lead to significant discrepancies between national electricity markets. • It should not neither ultimately increase the risk of supplier bankruptcy, as it would be the case in France if the regulator were to confirm its intention to require suppliers to fully hedge, at all costs, the total volumes contracted with consumers when signing the contract. • The implementation of mandatory hedging strategies should not hinder suppliers from embedding termination fees in their offers. Indeed, termination fees can be part of the economics of a contract and can therefore reduce the customer's price while reducing suppliers' price risks exposure.

## **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 checked="" type="radio"/>	<input type="radio"/>
Higher energy bills	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" 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 checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Uncertainty/absence of national/regional/local plans and timelines for phasing out natural gas	<input type="radio"/>	<input type="radio"/>	<input checked="" 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 type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Difficult to take action for a rented home	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Difficult to take action in a multi-apartment building	<input type="radio"/>	<input type="radio"/>	<input 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

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

2000 character(s) maximum

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

	Very important	Important	Neutral	Less important	Not important	No opinion
Clear and comprehensive information (what to do)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Practical advice (how to do it)	<input type="radio"/>	<input checked="" 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 type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Support to bundle individual projects for joint purchasing or contracting (do it together to get a better deal)	<input type="radio"/>	<input type="radio"/>	<input 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



In France, vulnerable customers and customers affected by energy poverty already benefit from many measures to help them manage their energy bills and consumption (energy vouchers, delayed payments for bills, disconnections ban, aid from local social funds, social workers or specific initiatives from suppliers to adapt their consumption). Concerning energy vouchers, it is essential to ensure that they cover a meaningful portion of the average annual energy bill and that this level of support remains consistent over time, in order to maintain the scheme's effectiveness and relevance for vulnerable households. To this end, a portion of the revenues generated from ETS 2 should be allocated to well-established and proven schemes such as the energy vouchers. Finally, to build on those measures and assist them in the phase-out of natural gas in their homes, the creation of a dedicated "equipment voucher" to support the installation of a heating control system could further help households to better manage their consumption and therefore their bills.

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

*3000 character(s) maximum*

## Contact

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