



Paris, le 22 juillet 2021

CEER public consultation on 2022 Work Programme

1. CEER proposes that the 2022 Work Programme should focus on the six priority areas from the 2022-2025 CEER Strategy (Consumer-centric design; Sustainable and efficient infrastructure; Well-functioning markets; Energy system integration; Flexibility; Decentralised and local energy; and Significant recurring work).

Whilst the areas themselves were consulted upon in the draft strategy public consultation, do you support how these areas flow into the draft 2022 Work Programme ?

Uprigaz agrees on the six priority areas selected into the 2022 Work Programme of CEER. Uprigaz also supports the methodology followed by CEER to address each of the priority area, as well as the specific items covered in the 2022 WP to review them.

2. Within each priority area, do you think the Work Programme focuses on the right deliverables or should some be deleted or added?

[Please note that not every aspect in each of the six core areas would be addressed in a single year's work programme.]

However, Uprigaz suggests that, for the Well Functioning Market area, an harmonization of the Guarantees of Origin (GOs) mechanisms in force in the Member States should be promoted , with a view to fostering transparent EU wide market of GOs for renewable electricity and gas .

Work Item 1 - Guidelines of Good Practice (GGPs) on future-proof energy bills

Description: These GGPs will consider latest market developments and business models and their implications for billing and billing information (e.g. dynamic contracts, smart technologies, aggregation, bundled products).

Strategy area : Consumer-centric design; Well-functioning markets

Do you have any specific comment on this individual deliverable?

UPRIGAZ supports the development of innovative gas and electricity offers based on consumption data from smart and communicating meters.

However, it is essential for suppliers to rely upon an accurate data base, i.e. that the data transmitted to suppliers and consumers are as reliable as possible and include all the relevant information for the implementation of innovative contracts and their invoicing.

In this regard, it seems appropriate that the NRAs, in consultation with suppliers and DSOs, develop quality assurance standards for data.

It is also essential that the deployment of smart meters be completed according to the EU schedules, even though some Member States are experiencing significant delays in this deployment.

UPRIGAZ is also in favor of promoting dynamic contracts for electricity, based on hourly consumption data. These contracts will make it possible to optimize the control of consumer demand according to the load curve.

On the other hand, in Member States which have sufficient gas storage capacities (underground storage and pipeline stocks), it does not appear necessary to offer dynamic gas offers. Maintaining a daily balancing obligation is perfectly suited to the natural gas system, and this advantage therefore benefits to consumers.

Work item 2 : Guidelines of Good Practice (GGPs) on trustworthy green offers

Description: In a context of decarbonization and increased awareness of sustainable and renewable energy consumption, the GGP will provide recommendations on promoting trustworthy information and communication of green offers.

Strategy area : Consumer-centric design; Well-functioning markets

Do you have any specific comment on this individual deliverable ?

UPRIGAZ supports the development of green offers, both in gas and electricity. But this development can only take place if it is accompanied by guarantees of origin harmonized at European level and which can be exchanged on an organized market.

The availability of an organized market avoids the risk of fraud that we have experienced, in France for example, in the market for energy saving certificates. The generalization of guarantees of origin will make it possible to develop renewable resources in the most suitable territories and where the acceptability of these energies is the greatest.

Work item 3 : Workshop series on consumer engagement with and access to markets

Description : CEER will hold a series of workshops linked to the issue of consumer engagement and access to markets. The debates will seek to identify opportunities and challenges for consumer engagement and ease of access to markets in the context of the energy transition and market changes (e.g. billing, green offers, new business models, etc.).

Strategy area : Consumer-centric design; Well-functioning markets; Decentralised and local energy

Do you have any specific comment on this individual deliverable ?

UPRIGAZ welcomes CEER's proposal to promote a consumer-centered design market.

UPRIGAZ underlines the importance of distinguishing among consumers those who, by virtue of their size or their degree of information, can adhere to new market-based supply models and smaller consumers who do not wish to take risks related to the volatility of market prices. These consumers will continue to rely upon their suppliers who can offer them products tailored to their size and needs.

UPRIGAZ would like to participate in workshops organized by CEER on this theme.

Work item 4 : ACER/CEER annual market monitoring report – energy retail and consumer protection volume

Description : One of the annual ACER/CEER Market Monitoring Report's three volumes will monitor consumer protection and empowerment and retail market developments across Europe. CEER will cooperate with ACER to deliver a comprehensive monitoring report to the European Parliament, investigating progress on the national implementation of European legislation on consumer protection and empowerment and consumer experience in European energy markets. The report will include deep insights into retail market developments, including prices, price regulations and market structures, and standing and new consumer issues such as energy poverty and active energy consumption. The primary data source for CEER inputs are CEER's national indicators and respective NRA surveys. Beyond presenting the key results of our assessment of the functioning of the Internal Energy Market (IEM) in 2021, the MMR also contains recommendations on how to address the remaining identified barriers to the completion of the IEM.

Strategy area : Consumer-centric design; Well-functioning markets

Do you have any specific comment on this individual deliverable ?

UPRIGAZ fully supports this approach led by CEER and ACER.

UPRIGAZ would also like this report to comment on the advisability of deleting definitely regulated tariffs for the sale of electricity in certain member states.

Work item 5 : Self-Assessment Status Report 2022 for the Roadmap to 2025 Well-Functioning Retail Energy Markets

Description : This fourth Status Report continues to implement the framework developed by CEER in its 2018 "Roadmap to 2025 well-functioning retail energy markets" in Europe that aims to deliver reliable, affordable and simple-to-use services to protect and empower consumers by 2025. The process of self-assessment can be described as a journey that starts with data collecting, continues with a self-assessment together with a gap analysis, which can lead to national recommendations and monitoring of the implementation of those recommendations.

CEER's Roadmap to well-functioning retail energy markets in Europe is part of CEER's pledge to realise the core principles in the CEER-BEUC 2020 Vision (since updated to 2030) and the objectives set out in the ACER's Bridge to 2025: Conclusions Paper. Also, CEER's views on putting consumers at the heart of the market complement well the areas for action and further improvement identified by the European Commission's "New Deal for Energy Consumers" and, subsequently, in recent electricity market design legislation.

Strategy area : Well-functioning markets ; Consumer-centric design

Do you have any specific comment on this individual deliverable ?

UPRIGAZ shares the approach of CEER and ACER to place consumers at the center of a well-functioning retail market. Benchmarking of services offered to consumers would be useful and could give rise to codes of conduct to which suppliers, DEOs, and service providers operating in the field of energy efficiency, should adhere.

Work item 6 : Review of the metrics in CEER's 2017 Handbook for National Energy Regulators in the light of the CEP implementation

Description : CEER acknowledges the fact that the 2017 Handbook for National Energy Regulators and its metrics are dynamic by nature since legislation evolves as well as national circumstances. This means that CEER will look into reviewing the metrics periodically and propose update or change metrics and/or definitions when necessary. In particular, CEER will verify whether the metrics have to be adjusted or complemented with additional metrics taking into account that most of the acts under the Clean Energy for All Europeans Package entered into force on 1 January 2021.

Strategy area : Well-functioning markets ; Consumer-centric design

Do you have any specific comment on this individual deliverable ?

UPRIGAZ subscribes to the updating of the Handbook for National Energy Regulators due to changes in European and national legislation. However, UPRIGAZ wants CEER to ensure that member states demonstrate technological neutrality in transposing European directives.

UPRIGAZ also calls for regulatory stability as there is a tendency to modify legislative provisions in the energy sector too frequently.

Work item 7 : 3rd CEER Report on Power Losses

Description: Reducing power losses contributes to greater energy efficiency and security of supply and is an important goal, not least because the costs of power losses are often passed on to consumers. The 2nd edition of the CEER Report on Power Losses was published in early 2020. As a preparation for working on the next edition, the Distribution Systems Working Group's Energy Quality of Supply Work Stream will start the preliminary work in 2021 with a publication of the report in 2022. This report will again provide a detailed overview of power losses (transmission and distribution) in electrical grids – the levels of losses, how they are defined, calculated and valued across as many European countries as possible (the 2nd report included 35 countries). With this report, NRAs and other relevant stakeholders can identify some good practices and may decide to adapt their legislation. Since decarbonisation is of greater importance now and in the future, it is obvious that knowledge about the amount and structure as well as possibilities to reduce losses is essential. The past two editions began to analyse these aspects and will examine them more closely in future editions. This work item will include a questionnaire for NRAs.

Strategy area: Sustainable and efficient infrastructure ; Decentralised and local energy

Do you have any specific comment on this individual deliverable?

UPRIGAZ subscribes to CEER's approach to publish a report online losses in the electricity sector. It would be useful for this report to enable network operators to have a collection of good practices established on the basis of a benchmark, with a view to minimizing losses.

Thus, it would be interesting to compare very centralized electrical systems with decentralized systems with a high proportion of renewables, in terms of performance inline losses.

Work item 8: Short paper on how Member States determine new connections and use 'flexible' connections

Description : In several Member States (MS) DSOs are faced with the challenge of realising an increasing number of new connections for decentralised (mostly renewable) electricity generation to a distribution network that is already constrained. In order to facilitate the injection of as much generated electricity as possible several MS have adopted an approach that is based on 'flexible' connections, also known as interruptible or non-firm connections. However, the approach adopted differs across MS and raises the question whether there are valuable lessons to be learnt on the EU level. These lessons can be identified in a short paper on this topic by addressing questions like:

- How do DSOs deal with the challenge of realising new connections and how do they prioritise between them?
- What kind of flexibility conditions are being used for new connections?
- How have MS governments and NRAs responded to this issue thus far?
- How could current approaches be further improved?

Strategy area : Flexibility; Decentralised and local energy

Do you have any specific comment on this individual deliverable ?

UPRIGAZ subscribes to the approach proposed by CEER. However, it seems important to underline that the injection of renewables should not be unreasonably dependent on the capacity constraints of transmission and distribution networks. Priority should be given to the right of injection. Interruptibility can hamper the profitability of renewable energy projects and therefore slow down decarbonization.

Work item 9 : Review of data shared by DSOs

Description : This work will build on the (online) workshops held at the start of 2021, which discussed the importance of data to the system, both to enable coordination across the whole system and also to facilitate the growth of flexibility markets. It would use consultancy support to map the data that is being shared at the moment and capture more detailed information from stakeholders on the type of new data they believe they need to access to better facilitate coordination or offer flexibility to the market. Another point to the study is the location and availability of data needed to boost flexibility at DSO level.

Strategy area : Flexibility; Sustainable and efficient infrastructure

Do you have any specific comment on this individual deliverable ?

UPRIGAZ has no particular observations to make on this approach.

Work item 10 : (Distribution systems/ Customers and retail markets) Electric Vehicles

Description : This report will explore considerations that arise with the emergence of business models for electric vehicles (EVs), from the consumer perspective as well as the infrastructure planning and management perspective.

The growth of electric vehicles will result in additional electricity use, and also potentially offer flexible support to managing networks. What is uncertain is the rate of growth and where it will take place, which is challenging for both DSOs to effectively plan and for NRAs to consider reasonable funding levels and the effectiveness of DSOs. This paper will look at how these uncertainties are being managed in different countries, in terms of planning, the amount and type of monitoring being rolled out to support planning and operation, data sources, coordination and tariffs.

Possible issues to be explored from the consumer perspective include access to infrastructure, billing and payment methods, consumer choice and comparability of services, (price) transparency for charging services for EVs, protection of vulnerable or energy poor consumers, etc.

Strategy area : Sustainable and efficient infrastructure; Flexibility

Do you have any specific comment on this individual deliverable?

UPRIGAZ is fully aware that the development of electric mobility will pose new problems for DSOs. The development of this mobility will be accompanied by increased use of digitization. Innovative experiments are being carried out all over Europe and should be the subject of feedback.

Work item 11 : Paper on the Cybersecurity Network Code

Description : The upcoming Cybersecurity Network Code will define functions and obligations for electricity market stakeholders in order to prevent and mitigate cyber incidents in electrical system.

Strategy area : Well-functioning markets ; Flexibility

Do you have any specific comment on this individual deliverable ?

UPRIGAZ supports CEER's approach, knowing that the risks of cyber attacks may be more and more frequent and affect the entire energy chain: transmission, distribution, marketing and the wholesale markets.

Work item 12: Biennial RES Status Review of Renewable Support Schemes in Europe

Description: This document will cover data for 2020 and 2021 and will form the latest update to the regular biennial CEER Status Review of Renewable Energy Support Schemes in Europe. These documents collect comparable data on RES support in Europe (e.g. by technology and support type).

Strategy area: Energy system integration; decentralised and local energy

Do you have any specific comment on this individual deliverable?

No.

Work item 13 : 3rd CEER Report on Tendering Procedures for RES in Europe

Description : This CEER report focuses on RES tendering procedures as it is one of the significant changes introduced for RES support in the EU. Tendering procedures are instruments to determine the financial level of support for electricity sourced by RES. Particularly following the Clean Energy Package, Member States are urged to opt for such market-based mechanisms. This report aims to present an updated overview of the key design elements of RES tendering procedures applied in most European countries.

Strategy area : Sustainable and efficient infrastructure ; energy system integration

Do you have any specific comment on this individual deliverable?

UPRIGAZ considers that the photovoltaic farms and the onshore/offshore wind turbines schemes have reached a stage of maturity which justifies the end of guaranteed price mechanisms and purchase obligations. The smallest facilities installed at the end consumer must be able to retain the benefit of the purchase tariffs.

Nevertheless, it is important that the sanctity of concluded contracts be respected. Any questioning of these contracts, as is the case in France for photovoltaic contracts concluded under the 2006 and 2010 feed-in tariffs, results in the freezing of renewable energy development initiatives. This could jeopardize the achievement of carbon neutrality objectives in 2050.

Work item 14 : Follow EC Offshore Strategy implementation steps

Description : The European Commission will follow up on the Offshore Renewable Energy Strategy published in 2020. This will affect a number of areas in relation to the electricity market design. With this deliverable, CEER will continue to follow the overall process and coordinate regulatory input where needed.

Strategy area: Well-functioning markets ; Energy system integration

Do you have any specific comment on this individual deliverable?

UPRIGAZ considers that offshore wind projects, whose costs have fallen sharply, has significant development prospects in Europe. Nevertheless, we observe that the permitting process of these projects is long and that litigation leads to a considerable lengthening of the completion times.

Work item 15 : Follow legal process and provide input on the EC Hydrogen and Gas Market Decarbonisation Package

Description : The European Commission will put forward legislative proposals for decarbonisation and sector integration by the end of 2021. Regulators are supposed to follow the process actively and to provide input on several dimensions (European Commission, Member States, Parliament). CEER gas experts will be largely responsible for this process, but also electricity experts will reflect on areas important for the electricity sector and issues related to the electricity market design.

Strategy area a: Energy System Integration ; well-functioning markets

Do you have any specific comment on this individual deliverable ?

UPRIGAZ has no particular comment to make.

Work item 16 : Financial regulation and the links to REMIT

Description : Gas and electricity markets have their own dedicated regulation to address market abuse and transparency – the REMIT. Recently, there have been some attempts to revise the existing legislation in a restrictive way and replace energy regulators with financial regulators in supervisory tasks for the concerned products. CEER has stated publicly that this would be inappropriate, inconsistent and inefficient considering the experience gained in this field by energy regulators. This deliverable is kept in case further public actions are needed in this respect (e.g. responses to public consultations, position papers, official letters...).

Strategy area a: Well-functioning markets

Do you have any specific comment on this individual deliverable?

UPRIGAZ shares CEER's opinion and considers that the specific nature of the wholesale electricity and natural gas markets should lead national regulators and ACER to retain responsibility for monitoring these markets.

Work item 17 : Accompanying the Hydrogen and Gas Market Decarbonisation Package along the legislative process

Description : CEER will accompany the legislative process of the Hydrogen and Gas Market Decarbonisation Package and will react jointly to proposals presented by the European institutions. During this process, a number of different work items will be implemented flexibly, depending on the legislative developments. Such flexible work items could include drafting position papers, or organising CEER discussions, webinars or workshops.

Strategy area : Energy System Integration ; Well-functioning markets

Do you have any specific comment on this individual deliverable ?

UPRIGAZ has no comments to make on the approach proposed by CEER.

Work item 18 : Gas Infrastructure Repurposing : Costs and Planning

Description : Decarbonisation should lead to reducing gas demand and developing hydrogen. Adapting gas infrastructure to hydrogen is an important aspect of this dynamic. The paper will investigate the repurposing options and costs with a literature review and will gather current practices and expectations at national level. The planning of these developments will also be addressed.

Strategy area : Energy System Integration ; Sustainable and efficient infrastructure

Do you have any specific comment on this individual deliverable?

UPRIGAZ considers that the issues related to hydrogen transport infrastructure will need to be clarified when the hydrogen business model will be further established and framed.

Work item 19 : Stakeholder Workshop on long-term energy storage

Description : CEER proposes to organise a stakeholder workshop to discuss the recommendations of the long-term energy storage deliverables. The aim is to receive feedback from infrastructure operators and market players on the need for regulation and potential orientations. A conclusion paper will be prepared.

Strategy area : Sustainable and efficient infrastructure ; Flexibility

Do you have any specific comment on this individual deliverable ?

UPRIGAZ adheres to this approach and will participate in this workshop.

Work item 20 : The role of LNG in the New Energy Market

Description : Within the context of the Hydrogen and Gas Market Decarbonisation Package and depending on the final outcomes for LNG terminals, CEER will study how to implement the new rules for regulated LNG terminals in a harmonised way across Europe and/or develop guidelines for their implementation. One of the subjects for the report could be the end of certain exemptions enjoyed by several LNG terminals in Europe. In this context, CEER may develop a common position of European NRAs on the future regulatory regime for these infrastructures and how to ensure a true level playing field within the European LNG market.

Strategy area : Well-functioning markets ; Flexibility

Do you have any specific comment on this individual deliverable?

UPRIGAZ considers that the European Union will continue to import LNG in the long term. We are not in favor of calling into question the exemption granted to certain terminals. In addition, we consider that the LNG terminals will eventually be able to import ammonia; thus contributing to decarbonization without being able to prejudge the most suitable mode of regulation today. The hydrogen business model is not yet stabilized.

Work item 21 : Webinars on Dynamic Regulation

Description : This is ongoing work on the dynamic regulation topic. The main objective of the webinars is to have an exchange among CEER and stakeholders involved in the work on dynamic regulation (e.g. presentation of different papers dealing with this topic, presentation of sandboxes, pilot projects or existing models of dynamic regulation cases).

Strategy area : Flexibility

Do you have any specific comment on this individual deliverable ?

UPRIGAZ adheres to this approach.

Work item 22 : Regulatory Frameworks Report 2022

Description : The Regulatory Frameworks Report (RFR) is an annual report which delivers a general overview about the implemented national energy regulatory regimes, the efficiency developments and it analyses the overall determination of capital costs. This report was previously named as the Investment Conditions Report. For years, the report is very popular by many stakeholders as it provides a clear

overview of the national regulatory regimes for the energy sector. Market participants and other stakeholders use the RFR to identify the regulatory regime in certain countries. TSOs/DSOs can benchmark how other countries deal with the financial issues they face, which are reflected in the regulatory frameworks. NRAs tend to use the RFR to compare their own regulatory regimes to those in other countries. It can therefore be considered as a hugely informative CEER report. The 2022 report will be the 11th edition of the report.

Strategy area : Well-functioning markets; Sustainable and efficient infrastructure

Do you have any specific comment on this individual deliverable ?

UPRIGAZ underlines the quality of this report and hopes that its publication will continue.

Work item 23 : TSO Cost-efficiency Benchmark (TCB21)

Description : The TSO Cost Efficiency Benchmark is a CEER deliverable that periodically measures the TSOs' cost efficiency. Such a benchmark is to ensure that tariffs are based on efficient cost as stipulated by European law, which is an important mandate of regulators. The benchmark helps to identify which TSOs are working efficiently and which could be improved. The upcoming TSO Cost Efficiency Benchmark 2021 (TCB21) will be the sixth edition for electricity and the third for gas.

Strategy area : Well-functioning markets ; Sustainable and efficient infrastructure

Do you have any specific comment on this individual deliverable ?

UPRIGAZ underlines the quality of this report and hopes that its publication will continue.