

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

The Green Tank

* Surname

The Green Tank

* Email (this won't be published)

info@thegreentank.gr

* Organisation name

255 character(s) maximum

The Green Tank

* 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.

396314833858-72

* 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
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- 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
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- 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**

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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.

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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

At the EU level, it is essential to move beyond high-level commitments and ensure that existing priorities, targets, and regulations related to just transition and consumer rights are effectively transposed, implemented, and enforced across all Member States. To this end we think that the continuation of funding for the economic transformation of coal regions across the EU is of paramount importance. These regions have been at the forefront of just transition since the previous programming period. Thus, leaving them without significantly dedicated funding in the next programming period will send the wrong message towards EU citizens and jeopardize the success of the entire just transition effort in all economic sectors. The EU must systematically integrate just transition principles into its overarching policy frameworks, ensuring that social fairness, citizen participation, and consumer protection are not treated as add-ons but as core dimensions of the Green Deal and related strategies. Sufficient EU-level funding and financing instruments must be allocated to support these efforts, with transparent mechanisms. The Social Climate Fund presents a major opportunity to support vulnerable households, and given high energy poverty across Member States, the EU should consider expanding it beyond 2032. At the national level governments should ensure that all the revenues from ETS2 and the eligible from ETS1 are effectively directed to citizens for long-term clean solutions that phase out fossil fuels. This will not only significantly decrease energy and transport vulnerability but also contribute to achieving climate goals. Authorities should also prioritize consumer awareness, access to information, support for consumer organizations, and enforcement of consumer rights, particularly regarding energy affordability, billing transparency, and access to renewable energy. Local authorities play a key role in tailoring policies to community needs, fostering social dialogue, and enabling meaningful citizen participation in energy transition decision-making. By aligning EU-level frameworks with national and local implementation, the just transition can become not only a guiding principle but a tangible reality for all European citizens.

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

For 'Other', please specify:

2000 character(s) maximum

Another reason would be in general the fragmented governance, the fact that responsibility is spread across multiple ministries (energy, housing, social affairs), with limited coordination and weak local-level capacity to deliver tailored support.

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 <i>(arrangements may concern support for customers in managing their energy use and costs, including flagging unusual high energy spikes or use in winter and summer seasons, offering appropriate flexible payment plans, debt advice measures, self-metering readings, and improved communication with customers and support agencies)</i>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Promoting customers' education and awareness (e.g. through one-stop-shops or advisory points)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Access to finance, vouchers or subsidies	<input 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 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

Measures like subsidies, education/information, flexible tariffs and efficiency upgrades are crucial to prevent the most vulnerable from disconnecting, however they work best when combined with other practices. Firstly, it is important to strengthen consumers' rights with mandatory disconnection safeguards, during critical periods e.g winter or heatwaves for households with medical equipment. An example could be France's Winter Protection on Rental Evictions: Trêve hivernale (<https://prasanthragupathy.com/2024/10/frances-winter-protection-on-rental-evictions-treve-hivernale/>). In that case definition of vulnerable households should include households with critical medical devices that should be protected during critical energy periods. Additionally, digitalization and data-driven support can provide help that is proactive and targeted. More space and support to community-based and collective solutions could provide security and trust for local communities. For example, a scheme of neighborhood solidarity fund like the Naturgy Foundation (Spain) (https://www.fundacionnaturgy.org/en/over-1700-vulnerable-families-improve-the-efficiency-of-their-homes-with-the-naturgy-foundation-energy-rehabilitation-solidarity-fund/?utm_source=chatgpt.com), which, among other, finances energy efficiency renovations for vulnerable families. It is important to highlight that the most significant measures are the ones that tackle the root cause of energy poverty, i.e. the dependence on expensive and polluting fossil fuels through e.g decarbonization of heating systems, efficiency measures, energy building upgrades, support for renewable-based energy community projects.

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 checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Flexible payment plans taking into account the customer's income and expenditure	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Debt counselling or energy efficiency advice to help consumers manage their energy costs and consumption	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Targeted financial support or coverage/ subsidies/ energy cheques provided by local /regional/national authorities	<input 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 best practices should follow the main categories of measures presented before.

1. Regulatory protections
 - a. In Spain vulnerable customers (Bono Social) (https://www.eurelectric.org/wp-content/uploads/2024/10/Position-Paper_Article-28a_Preventing-Disconnections_Final.pdf) were protected until 31 December 2024 by a scheme granting 4 months to settle arrears plus 6 months with limited supply (3.5 kW), while severely vulnerable households and those with children under 16 or significant disabilities could not be disconnected if supported by social services. Since January 2025 this scheme has expired, but all Bono Social beneficiaries remain protected from disconnection until 31 December 2025 with discounts of 50%/65% (first half of the year) and 42.5%/57.5% (second half).
 - b. France's Winter Protection on Rental Evictions: Trêve hivernale (<https://prasanthagupathy.com/2024/10/frances-winter-protection-on-rental-evictions-treve-hivernale/>). In France, electricity and gas disconnections are prohibited between 1 November and 31 March, ensuring that households are not left without heating during winter. Belgium similarly provides protections during extreme weather periods.
2. Targeted Financial Support It is important to highlight that this financial support should always be accompanied by other structural and long-term measures that ensure the decarbonization of the building and road transportation sectors, thus addressing a key element of energy poverty, i.e. the dependence on increasingly expensive and polluting fossil fuels, which in turn exacerbates the inability of households and small businesses to pay the bills. An example of good practice is the provision of direct payments in the context of Social Climate Fund for dealing with the impact of the carbon price in the heating and road transportation sectors due to the implementation of ETS2. In this case the payments are targeted to the most valuable, only for a period of time, with an upper limit of 37.5% of the total fund, considering that other long-term measures are also in place. Example of how direct payments combined with targeted measures and policies can be found in the study performed for Greece from Green Tank and Facets : Recommendations for policies and measures to mitigate ETS2 implementation impacts in Greece” (https://thegreentank.gr/wp-content/uploads/2025/07/ETS2-impact-report_Facets_Green_Tank_EN.pdf)
3. Structural and Community-Based Solutions
 - a. Neighbourhood Solidarity, Energy Communities and self-production (Various EU countries, EU Projects): Community energy initiatives distribute renewable energy benefits locally and can provide major discounts t vulnerable households.
 - b. Home Renovation Programs (Spain, France, EU Cohesion Funds): Energy efficiency upgrades reduce household energy costs over the long term, addressing the root causes of energy poverty.
 - c. Social housing combined with Renovation activities supported by Energy Communities
4. Digitalization-information-education
 - a. Demand response and roll out of smart metering. Demand response benefits households through bill savings but also contributes to phasing out fossil fuels. However, the implementation rate of demand response is low, mainly due to low roll out of smart meters that are needed to inform households and support energy consumption decisions as well as smart appliances. Regarding smart meter roll out a good example is Poland which has enacted legislation mandating the replacement of existing smart meters with 17 million new remote reading electricity meters (ROCs) by the end of 2028 <https://caneurope.org/central-eastern-europe-grids/>. Another challenge is the lack of tariffs that promote flexibility. As part of this, citizens can be educated and encouraged to reduce their electricity usage overall or at least during peak hours, thus leading to lower bills. A good example is the Power Off & Save trial in Ireland with EirGrid and Electric Ireland: (<https://prd-cdn.electricireland.ie/media/docs/default-source/power-off-save/power-off-and-save-progress-report-2016.pdf>)
 - b. Observatory of Energy Poverty has contributed to some extent to monitor energy poverty levels, but more recent and accurate data is needed to target effectively the most vulnerable.
 - c. One-Stop Shops/Advisory points More of them should be created in member states as they can provide integrated support services, combining energy advice, social benefits guidance, and debt counseling.
 - d. Voluntary Codes of Conduct (e.g UK -https://www.energy-uk.org.uk/news/energy-uk-launches-vulnerability-commitment/?utm_source=chatgpt.com): Energy suppliers adopt voluntary charters committing to proactive engagement with vulnerable customers, including: flagging unusual consumption spikes, offering flexible payment plans, providing debt advice and improved communication channels.

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

Accelerating the development of new grids and prioritizing grid connection requests by self-production energy community projects.

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

A number of good practices could be highlighted in future guidance to support the deployment of renewables-based energy community projects and strengthen the rights of consumers across the EU. First, in relation to permitting and licensing procedures, it is important that Member States receive clear EU-level guidelines on how to streamline administrative steps and remove regulatory or technical barriers that often delay or discourage collective energy initiatives. It is important to encourage MS to set clear and obligatory quantitative targets for energy community and self-consumption projects. The targets should include specific timelines and total capacity by this kind of renewable energy projects, as well as explicit provisions for grid access. In Greece the installed capacity from self-consumption projects has reached 1 GW (https://thegreentank.gr/wp-content/uploads/2025/05/202504_%CE%A4heGreenTank_EnComBrief_7_finEN-1.pdf), but citizen interest has declined, especially over the past year. Key challenges include limited electricity grid space and the transition from net metering to net billing. Law 5037/2023 reserved 2 GW of grid capacity for self-consumption, yet combined approved and pending projects already total 1,865 MW. Since 2018, 46.7% of requested capacity for energy community projects has been cancelled, and institutional changes, including a year-long delay in the ministerial decision on net billing, have slowed new requests, creating uncertainty for citizens, investors, and suppliers, compounded by delays in clearing electricity bills. A second area where good practices are needed is access to finance and tailored support instruments. In many Member States, including Greece, dedicated financing for energy communities remains very limited, which makes it difficult for citizens, SMEs, and municipalities to participate in the energy transition on equal footing with larger market players. Good practice examples include the establishment of special guarantee funds, low-interest loans, and priority access to EU structural and recovery funds earmarked for community energy projects. Furthermore, technical assistance facilities at national level can help smaller actors prepare viable projects and navigate complex funding requirements. In Greece, so far there has been limited financial instrument for citizen energy, mainly funding programs for farmers and PV on rooftops. Funding for energy communities has been limited as well mainly for projects from municipalities in the transition areas drawing on the Just Transition Fund (PDAM 2021-2027) resources. Very important is the very recent European Energy Communities Facility, which is in the right direction. Existing national and EU resources should be used to further support self-production projects by energy communities set up by citizens and SMEs, as well as other projects implementing virtual net-billing across Greece. A guarantee mechanism should be established to facilitate access to bank loans for self-production projects by energy communities launched by citizens and SMEs. This mechanism could be set up via a development fund; the latter could additionally subsidize costs related to both project “maturation” and installation of storage and/or renewables infrastructure. Finally, Social Climate Fund and ETS revenues should be used to further support energy communities. A study performed for Greece from The Green Tank and Facets : Recommendations for policies and measures to mitigate ETS2 implementation impacts in Greece” (https://thegreentank.gr/wp-content/uploads/2025/07/ETS2-impact-report_Facets_Green_Tank_EN.pdf), showed that the funding sources can sum up to € 15.5 billion to effectively tackle energy and transport vulnerability due to ETS2, a part of which should be channeled to support energy community projects. Equally important is access to reliable and transparent information. The Citizen Energy Advisory Hub could be enhanced with more data for energy communities and citizen-led projects. A common framework could be introduced for reporting data & information on energy communities across EU member states. For example, having a minimum level of data + information reported to a central regulatory authority in each country. This can include: data on projects (number, capacity, commercial/citizen etc), information on country regulatory framework, information on available funds. An example is the “Energy Communities and Self-consumption” Watch that we have and update regularly at The Green Tank based of DSO and other Regulators’ data, for the Greek context. This tool tracks data, geographic distribution, legislation and funds and allows citizens and policymakers to better understand how energy communities are responding to the energy crisis and contributing to self-production and local resilience. You can find it here: Community Energy & Self Production Observatory (<https://thegreentank.gr/en/community-energy-watch-en/>).

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

Please explain your answer.

1500 character(s) maximum

Number of self-consumption projects Total installed renewable energy capacity by self-consumption projects

4. On Active Customers and Energy Sharing

With the introduction of a right to energy sharing in the Electricity Market Directive (EU) 2024/1711, households, businesses and public bodies can share self-produced renewable energy directly between each other without the need for a supply license. This practice empowers consumers to collectively operate or use renewable energy systems and access the generated electricity at affordable rates.

01. In relation to energy sharing, would you find it useful if the Commission provides guidance on:

(Please rate according to importance)

	Very important	Important	Neutral	Less important	Not important	No opinion
Data management	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Consumer protection	<input checked="" type="radio"/>	<input 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 checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Energy sharing organiser	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Involvement of energy poor and vulnerable households	<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

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

5000 character(s) maximum

On data management, it is essential to ensure secure, interoperable, and non-discriminatory access to consumption and production data, so that households and communities can transparently track benefits from shared renewable systems. Clear protocols on data privacy and data portability should also be set, preventing monopolistic practices by suppliers or DSOs. Regarding consumer protection, guidance should define minimum standards on billing transparency, fair contract terms, and safeguards against hidden fees or discriminatory treatment of energy sharers. This would strengthen trust and participation, especially among smaller consumers. For the role of the energy sharing organizer, the Commission could clarify responsibilities such as metering, settlement, and dispute resolution, while avoiding excessive administrative burdens that would deter citizen-led initiatives. Finally, guidance on the involvement of energy poor and vulnerable households is crucial. Energy sharing can act as a social innovation tool to reduce energy poverty, provided that targeted measures—such as preferential tariffs, subsidies for participation fees, or dedicated shares in community projects—are explicitly encouraged. Commission guidance could therefore set a common baseline for ensuring inclusivity, so that vulnerable households benefit equally from the energy transition rather than being left behind. Spain's REC (Renewable Energy Communities) framework, supported by NextGenerationEU funds, is a good example: it provides both financial and technical assistance, explicitly prioritizing projects that include vulnerable households or social housing. On data management, pilot projects under the EU-funded Horizon REScoopVPP project show how digital platforms can securely manage and visualize consumption and production data for energy communities, giving participants real-time insights and fostering trust. Finally, in Greece, the Green Tank Community Energy and Self-Production Observatory tracks the growth of energy communities and provides publicly accessible data, strengthening transparency and citizen engagement. These examples demonstrate that energy sharing can be both a technical and social innovation, supporting inclusivity, affordability, and active consumer participation when implemented with the right safeguards.

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 checked="" type="radio"/>	<input 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 checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<u>Benefit:</u> Better integration of renewable energy sources	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<u>Benefit:</u> Improved grid stability	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<u>Benefit:</u> Increased consumer engagement and awareness, leading to better energy management	<input type="radio"/>	<input checked="" 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 checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<u>Challenge:</u> Insufficient regulatory framework	<input checked="" type="radio"/>	<input type="radio"/>	<input 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 type="radio"/>	<input checked="" 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 checked="" type="radio"/>	<input 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 checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Challenge: Other



Benefit: For 'Other', please specify:

2000 character(s) maximum

Challenge: For 'Other', please specify:

2000 character(s) maximum

There are also equity concerns: not all consumers have the digital tools, financial flexibility, or digital literacy to benefit equally, and vulnerable households (including households with specific health condition needs and elder people) risk being disproportionately exposed to price volatility without the ability to shift their demand. The lack of transparency in contracts could also lead to consumer confusion or mistrust.

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 checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Developing user-friendly digital tools and platforms for real-time energy management	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Enhancing the access to smart meter data and automation to support flexible consumption	<input 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 checked="" type="radio"/>	<input 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 checked="" type="radio"/>	<input type="radio"/>	<input 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 checked="" 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 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 checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Promoting access to real-time consumption data through smart meters to enable informed usage decisions	<input 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 checked="" type="radio"/>	<input 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 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

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

At the EU level, the Commission and EU agencies should ensure that consumer rights and opportunities—such as protections against disconnections, the right to energy sharing, and the ability to participate in energy communities—are communicated in a clear, harmonized, and multilingual way. EU-wide campaigns, backed by funding through programs like LIFE Clean Energy Transition could provide communication materials and awareness tools to be adapted by Member States. The EU can also support comparative platforms (e.g. EU-wide transparency tools, similar to national retail price comparison sites to compare retail prices across MS). This platform (or an additional one) could be enriched with information on consumer protection to foster knowledge exchange on best practices. Also, EU institutions can encourage member states to implement in action all the provisions – for example energy sharing in Greece is legally introduced, however no other action has been performed to put it into practice. Finally, it is important to ask from the member states to set quantitative targets for energy community-energy sharing-self-consumption projects, demand flexibility, energy efficiency which are measures not only for consumer’s protection but also for engaging them actively in the energy transition. At the national level, governments and regulatory authorities need to ensure that consumer information services are available and accessible to all. This includes setting up or strengthening one-stop-shops and independent physical advisory points for consumers on issues like switching suppliers, available subsidies, or joining energy communities. Also, the online information on subsidies, tariffs, access to energy communities should be easily accessible in the regulator’s website or another public purpose-built page but also share important information through other channels e.g social media, campaigns on tv, radio. Governments should also provide funding schemes to consumers to support them, on implementing solutions for energy efficiency, demand side response and self-consumption that will provide energy security, electricity consumption monitoring and regulation, and as a result an active role in the energy transition. National consumer protection agencies and energy regulators should actively monitor whether information provided by suppliers is transparent, comparable, and accessible, and impose penalties for misleading practices. Importantly, digital literacy barriers must be addressed through parallel offline channels, so that less tech-savvy groups are not excluded. At the local level, municipalities, NGOs, and energy communities play a decisive role in direct engagement with citizens. Municipal one-stop-shops for energy advice, local campaigns on consumer rights, and partnerships with social services can directly reach vulnerable consumers and those at risk of energy poverty. Schools, community centers, and social housing providers can also integrate consumer awareness activities into their work, ensuring long-term behavioral change and empowerment. It is important that measures and practices adapt always to local needs. For example, just transition regions, which would benefit from increased support for transitioning to renewable energy sources, or communities in outermost regions (e.g. islands) and would benefit a great deal from becoming self-reliant through energy community projects.

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

1. Clarity and transparency of energy bills: Energy bills remain overly complex in many Member States, with hidden charges, unclear tariff structures, and limited comparability. A priority could be the introduction of harmonized bill formats that highlight the most important elements upfront (unit price, fixed charges, contract type, and total monthly cost), supported by digital and offline comparison tools. 2. Unfair commercial practices: Cases of misleading advertising, aggressive sales practices, and opaque contract terms remain frequent (definitely the case in Greece for example). The EU should prioritize stricter enforcement mechanisms, minimum standards for transparency, in tariffs, contract terms and monthly charges. 3. With the new right to energy sharing under Directive (EU) 2024/1711, there is a growing need for clear consumer safeguards: transparent data management, privacy protections, fair pricing rules, and ensuring that vulnerable households

can also participate. Guidance should also clarify the role and responsibilities of energy sharing organizers. 4. Digitalization and accessibility: The transition and rollout of smart meters should not be a burden to customers and should be accompanied with informative public campaigns on what smart meters are, how they can be used, their benefits for consumers and the energy system. The UK had set up a whole organization campaigning for years on smart meters: <https://www.smartenergygb.org/>. Additionally, as billing, and energy management become increasingly digital, the EU should prioritize inclusive digitalization practices, ensuring that non-digital consumers (elderly, low-income, or digitally excluded groups) have access to offline support and equivalent consumer rights. 5. Support for vulnerable and energy-poor households: Beyond disconnection safeguards, the EU could set minimum standards for targeted social tariffs, financial advice, and debt management services, ensuring consistent protection across all Member States. Priorities should therefore focus on: (a) simplifying and harmonizing bills and offers; (b) tackling unfair practices with strong enforcement; and (c) ensuring inclusive access to new opportunities like energy sharing and self-consumption schemes, particularly for vulnerable consumers.

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

It is important to highlight that meaningful and early participation of the local community is a key factor to ensure the public acceptance of renewable projects. Transparent and inclusive planning processes—including early-stage public consultations, citizen assemblies, and local dialogue platforms—help to reduce opposition by addressing concerns on land use, fairness, and environmental impacts. When big companies develop renewable energy projects, it is crucial they maintain open dialogue with local communities, share tangible benefits, and build trust. This works best within a framework with clear indicators to measure impact and guide engagement. Such a framework exists in CAN's guide "Community Engagement and Fair Benefit Sharing of Renewable Energy Projects," which offers 15 indicators for ensuring fair participation and benefit-sharing. The Green Tank and Electra Energy Cooperative have produced a Greek version with policy recommendations (<https://thegreentank.gr/en/2025/06/05/res-community-engagement-en/>). Finally, it is important to understand that community energy projects and energy sharing schemes give citizens a direct stake in the energy transition, ensuring they not only support but also benefit financially from renewables. For this reason, it is important to provide targeted financial incentives such as grants, subsidies, or favourable loans for households and communities to invest in rooftop solar, heat pumps, or efficiency measures, create a sense of ownership and fairness. This will not only benefit citizens, but also protect the climate, as decarbonization, especially in buildings, can move faster. It is very important to highlight the benefits of renewables on broader issues like energy sufficiency and energy security as well as lower energy prices.

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

1) lack of understanding of the different tariff options. People often find it difficult to properly understand the differences between green/yellow/blue tariffs. 1.5 yrs after the introduction of this tariff structure, 65% of residential customers are still at the default green tariff, which has been in many months the most expensive option. 2) lack of trust with suppliers and lack of understanding on how to switch. There is not available public and independent information on switching and people show a lack of trust with other suppliers. As a result, PPC still holds >70% of residential customers, the vast majority on the green tariff. 3) the Greek Regulatory Authority for Energy does very little to improve knowledge and awareness of energy topics to customers. It provides a platform for comparing monthly price tariffs but does little to explain the differences between tariffs and advise consumers on how to choose. The resulting information can be overwhelming. Also, its monthly reports on the

state of the retail energy market offer a minimum level of transparency on the market, with significant room for improvement by enforcing checks on tariff structures, checking for unfair commercial practices and offering a platform for consumer complaints.

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

For 'Other', please specify:

2000 character(s) maximum

It is important that all the information from all suppliers is in one place, easily accessible and comparable. Also, there should be information points in all cities, towns etc, maybe through citizen service centers, or one-stop shops to provide information to citizens and help them choose the best option for them.

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 (the pricing structure, making clear all the elements and additional charges, but mainly the final cost)
2	Term and duration (length, fees, penalties)
3	Any discount on energy usage/vulnerability/social criteria
4	Type of contract (flexible, stable)
5	Comparison tools

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

In Greece, last year (January 2024), a new system was established regarding retail electricity tariffs the so called "colored tariffs", according to which Greek retail electricity offers are grouped and color-labelled so consumers can recognize the pricing logic: • Blue = Fixed price for the whole contract period, typically 12 months or more. • Yellow = Variable price (supplier formula; typically monthly updates linked to wholesale benchmarks). • Orange = Dynamic price (real-time or near-real-time pricing; requires a smart meter). • Green = Special tariff (a regulated structure where the final supply price must be announced by the 1st day of each consumption month; the formula calculating the consumer's cost was specified by the ministry) The framework for the green tariff was created by Law 5066/2023 (Art. 17) and the details were then set by Ministerial Decision ΥΠΕΝ/ΔΗΕ/120637/2107 (Government Gazette ΦΕΚ Β' 6600/21.11.2023). Initially this was a good step for securing low electricity costs as presented by the ministry. An official comparison site was created <https://energycost.gr/> from the regulator RAAEY, which aggregates retail offers so consumers can browse historical and current tariffs by category, compare the offers and decide which is the best for them. The major advantage of this new framework is that consumers can switch from one retailer to another each month without incurring any fees or penalties. So, this provides a wide range of choices for consumers, enhancing transparency and competition among retailers. However, in practice, and after one and a half years of

implementation, it seems that there are many challenges and things that aren't working properly: 1) Complexity hasn't vanished: Even with colors, formulas, caps/floors or supplier-specific adjustments are hard to parse; consumers still need to read a lot to understand; also the official comparison website is overwhelming to most people. 2) Supplier practices are confusing: The final cost is not clearly communicated to consumers. In many cases, switching from one supplier to another is a slow process, which varies greatly between different suppliers; is primarily (but not completely) carried out online, which can pose additional barriers for certain groups of consumers, particularly those who are less digitally literate or lack access to online services. On the other hand, despite the online option for the switches in action it seems that most of the time it cannot be implemented without a phone call, which can be a slow process. There are also some aggressive commercial strategies. Suppliers employ a number of ways including repeated phone calls and door-to-door sales to get new customers. In this process they often target households with lower energy awareness that would be more easily convinced to switch. 3) Delays in tariff upload: Special-green tariffs should be set and provided online on the 1st day of each consumption month. However, this is not an obligation for other types of tariffs, so there are delays in having all the information needed to compare the different tariffs and decide which to choose for the upcoming month. 4) Communication: There are not enough channels of communication and the available channels are not always suitable for the right consumers. Also, information is not consistent among those channels e.g. information on the supplier online portal might differ from what a consumer might discuss on the phone with customer service or from what a consumer might see on a paper bill. If these challenges are addressed and stricter rules are enforced for suppliers to ensure effective competition, it would represent strong policy and a best-practice approach to consumer protection.

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

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

2000 character(s) maximum

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 checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Lack of information on plans and concrete actions to take	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
No availability of companies or workers for the installation	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Difficult to take action for a rented home	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Difficult to take action in a multi-apartment building	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other	<input type="radio"/>	<input 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

The main concerns are the continued dependency on fossil gas and the government’s support for DESFA’s plans to expand the gas distribution network to more households. This is particularly concerning because high electricity costs are largely driven by the expensive use of fossil gas. It is also worrying that fossil gas is being prioritized over cleaner alternatives, for example, in lignite regions where district heating systems are being converted from lignite to gas instead of renewable technologies. Dependency on fossil fuels for heating and transport will impose additional costs on households under ETS2, which is expected to increase spending by EUR 833 million–1.6 billion over 2027–2032 and raise energy and transport vulnerability by 0.9%–1.5% and 1.1%–2.1%, respectively, according to a study that we (Green Tank) conducted with Facets. Well-established alternatives exist, including energy upgrades, heat pumps, solar panels, and efficient electric appliances. Providing financial support and incentives for households to adopt these solutions is crucial, using all available funding sources, including the Social Climate Fund and ETS1/ETS2 revenues. Coordinated and clear plans at the national (NSCP), regional, and local levels, with quantitative targets and tangible measures, are essential for a successful transition.

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

For 'Other', please specify:

2000 character(s) maximum

All of the above are important and valuable, but only along with the political desire to proceed with the phase out, setting targets, building the right programs for energy efficiency schemes, energy upgrades, heating systems change etc. Once the plan is clear and the financial instruments are properly designed, it is very important to provide advice to customers, which is much needed. One-stop shops are ideal for this, together with experts that can support groups facing mobility restrictions or elderly groups. Also, it is important to consider as part of the solution energy communities and energy sharing schemes, which can support and engage directly vulnerable citizens. The right set of solutions, implemented in combination can eliminate energy poverty. The study performed in the Greek context for ETS2 implementation (https://thegreentank.gr/wp-content/uploads/2025/07/ETS2-impact-report_Facets_), showed that a number of structural measures which include expanding social housing, replacing oil-based heating systems with heat pumps, deep or shallow renovations, and the installation of photovoltaic systems to meet own electricity needs either by individual households or collectively through energy communities can eliminate energy vulnerability in 276-348 thousand households in Greece, for an estimated total cost of €6.8-8.4 billion over the period 2026-2032. These measures should also be accompanied by direct income support as an option provided by Social Climate Fund Regulation, which would add an additional but feasible cost of 511 to 595 million for the vulnerable households. It is important to advise and encourage the governments to use all the available funds, including ETS revenue, for social protection and especially for the most vulnerable. For example, in the Greek case, the study shows that the available funds (SCF+ETS1+ETS2), which should be mobilized to effectively tackle the social impacts of ETS2 are up to €15.5 billion.

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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