

Public consultation on Draft CEER 3D Strategy and CEER 2019 Work Programme

A Eurelectric response paper

August 2018

Eurelectric represents the interests of the electricity industry in Europe. Our work covers all major issues affecting our sector. Our members represent the electricity industry in over 30 European countries.

We cover the entire industry from electricity generation and markets to distribution networks and customer issues. We also have affiliates active on several other continents and business associates from a wide variety of sectors with a direct interest in the electricity industry.

We stand for

The vision of the European power sector is to enable and sustain:

- A vibrant competitive European economy, reliably powered by clean, carbon-neutral energy
- A smart, energy efficient and truly sustainable society for all citizens of Europe

We are committed to lead a cost-effective energy transition by:

investing in clean power generation and transition-enabling solutions, to reduce emissions and actively pursue efforts to become carbon-neutral well before mid-century, taking into account different starting points and commercial availability of key transition technologies;

transforming the energy system to make it more responsive, resilient and efficient. This includes increased use of renewable energy, digitalisation, demand side response and reinforcement of grids so they can function as platforms and enablers for customers, cities and communities;

accelerating the energy transition in other economic sectors by offering competitive electricity as a transformation tool for transport, heating and industry;

embedding sustainability in all parts of our value chain and take measures to support the transformation of existing assets towards a zero carbon society;

innovating to discover the cutting-edge business models and develop the breakthrough technologies that are indispensable to allow our industry to lead this transition.

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WG Retail Market Design
WG Commercial Processes and Customer Relationship
WG Gas to Power
WG Renewables

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KEY MESSAGES:

- Eurelectric welcomes the CEER initiative to define a long term strategy for the market organisation and to define it through specific deliverables.
- Our association is very pleased to see that CEER clearly advocates for well-functioning markets and the protection of consumers as the “primary duty” of regulators. Competitive markets are in fact key in delivering innovative services to customers and offering efficient consumers protection.
- Eurelectric fully endorses CEER’s “3-year; 3-D” (Digitalisation, Decarbonisation and Dynamic regulations) strategy, and would be pleased to ask for clarification on certain elements :
 - Digitalization should in fact be promoted as a tool for consumer’s empowerment, and not as a target in itself. Both cross-sectorial approach and bottom-up should also be favoured as an efficient way to ensure a flexible and efficient regulatory framework.
 - Decarbonisation being rightfully defined as an essential objective of CEER’s new strategy, Eurelectric would like to highlight the key role of electrification as cornerstone of decarbonisation (in line with our “Decarbonisation Pathways” study released in June 2018).
 - Eurelectric fully endorses CEER’s objective to define “Dynamic Regulation” as a key point of its strategy. Principle-based regulation should therefore be favoured, meaning that enforceable principles should be preferred to rigid rules prescribing how thing should be done.
- Eurelectric is fully committed to further cooperating with CEER in the implementation of its 2019 Work Programme. We will try and ensure that such new regulatory framework properly addresses the interest of the European industry, in particular the need for stable and principle based regulation as well as a level playing field for all market players.

1. DRAFT CEER 3D STRATEGY

As the trade association representing the common interests of the European electricity industry, accounting for 34 members in 32 countries, Eurelectric is fully committed to further cooperating with CEER and to promoting regular dialogue between regulators and the industry. We welcome the publication of CEER's 3D Strategy and 2019 Work Programme as valuable documents contributing to establishing a constructive debate between stakeholders and as such benefiting the whole sector.

First of all, Eurelectric is very pleased to see that CEER clearly advocates for well-functioning markets and the protection of consumers as the "primary duty" of regulators. Deep changes are currently challenging the organization of the whole energy sector and in particular the role of consumers. In this regard, Eurelectric strongly stands for the role of competitive markets in delivering innovative services to customers and offering efficient consumers protection. We are ready to closely work with European regulators in order to define efficient framework conditions to allow competition and innovation to flourish.

Eurelectric fully endorses CEER's "3-year; 3-D" (Digitalisation, Decarbonisation and Dynamic regulations) strategy, but we would be pleased to ask for clarification on certain elements.

D1. Digitalisation: Drive forward a new deal for consumers in a digital world

Eurelectric welcomes CEER's objective to foster competitive European energy markets and empower consumers through digitalisation. The energy sector is at the very heart of 3 main trends: the increasing role of electricity in many services (transport, health, telcos...); the evolution towards a more decentralised electricity system, and the growing level of digitalisation. If properly regulated, digitalisation can bring opportunities across the whole electricity value-chain actors: generation assets, transport/distribution grids, and end-consumers

In order to make an efficient use of digitalisation, several principles must be respected:

- First, it is essential not to consider digitalisation as a target in itself but as a catalyst to facilitate new businesses, cost savings and consumer empowerment. We therefore fully supports CEER's intention to ensure that digitalisation contributes to the empowerment of consumers and to guarantee that energy issues remains understandable, affordable and fair. In this regard, interactive billing has to be favoured as a way to engage customers and to send proper information according to their specific needs.
- Second, as digitalisation is ongoing in various sectors (energy, telecoms...), regulators should aim at developing a cross-sectoral approach. Eurelectric strongly approves CEER's intention to promote cooperation between sectorial authorities, namely through its PEER initiative launched in 2017. This approach particularly guarantees a level playing field for market players, even if such players come from other sectors. This cross-sectoral dimension is one of the priority of the new Structure of Expertise of Eurelectric, which will be operational as of September 2018.

- Finally, regulators should avoid the definition of unilateral standards responding to political considerations rather than technical feasibility. Bottom-up approach should be favoured in order to allow for a real flexibility and freedom of choice in the market.

Moreover, Eurelectric would like to highlight the essential role of energy suppliers in the new organization of the electricity system when dealing with consumer's issues and digitalisation. Suppliers do not only supply electricity, but also help customers manage their consumption by instalment and maintenance of smart home energy management systems, and by aggregating their loads or self-generation. Regulators should ensure that a sound regulatory framework enables them to take such a role.

D2. Decarbonisation at least cost

In fact, Eurelectric is pleased to see that decarbonisation is another essential objective of CEER's new strategy.

In line with our "Decarbonisation Pathways" study released in June 2018, Eurelectric advocates for a real decarbonisation strategy with electricity as a cornerstone. The study, which confirms the ambition of the power sector to become carbon neutral well before mid-century, has led to the following conclusions:

- A 95% emissions reduction by 2050 requires at least 60% direct electrification of the EU economy
- The potential for electrification is substantial across energy- using sectors (transports, buildings, industry) and will underpin deep decarbonisation of the economy
- In addition to direct and indirect electrification, energy efficiency measures and other carbon neutral solutions will also be key to delivering these ambitions
- Different starting points in terms of energy mix, economic situation and industrial activities require different pathways and level of efforts across EU countries.

In this context, we approve CEER's intention to reach decarbonisation at least cost, primarily through the development of low carbon and renewable energies sources and the improvement of energy efficiency. However, Eurelectric would like to draw attention on elements included in CEER's strategy regarding tools for carbon costs internalisation, in particular carbon taxes and carbon floors. Analysis should address the effects of defining unilaterally such tools by member states and the policy overlap undermining the ETS as the key instrument for decarbonisation. The deployment of a critical mass of recharging points to facilitate the development of clean mobility should also be addressed within CEER's decarbonisation strategy.

Moreover, Eurelectric welcomes the publication of the future report on "Investment Signals with increasing RES penetration". In a world with increasing share of renewables and low variable costs technologies, energy, flexibility and reliability need to be properly valued in the market in order to make the market design fit for the low-carbon transition and give the appropriate investment signals. In particular, well-designed capacity mechanisms (i.e. market-based, technology neutral, open to existing and new assets, and

open to cross-border participation) remunerating the firm and flexible capacity are key as they aim at providing investment signals for the existing capacity and new capacity strictly needed to ensure security of supply, especially in areas with market failures. The report should also focus on the need for long term price signals for renewables, which are negatively affected by negative correlation in short term markets between their level of production and revenues.

Last but not least, in the current policy framework, electricity, which is on its way to becoming decarbonised well before 2050, (in 2017 59% of power generation in Europe is already carbon-neutral), is bearing a much higher burden than fossil energy carriers. CEER should thus promote the “polluter-pays” approach, in order to require all polluting energies to bear the burden of such costs, setting a fair distribution of climate action.

D3. Dynamic Regulation: European solutions for adaptive regulation in a fast changing world

Eurelectric fully endorses CEER’s objective to define efficient and adaptable regulation as a key point of its strategy. As stated in the consultation document, it is essential that regulation is “stable, but not static” and that the need for an increased flexibility in the market is combined with a clear regulatory predictability. In order to reach that goal, Eurelectric is advocating for more principle-based regulation, meaning that enforceable principles should be preferred to rigid rules prescribing how things should be done. CEER analysis should in the same sense highlight the inconsistency of pretending the development of a consumer centric approach that seeks the engagement of active customers while keeping in many EU States Government interventions in electricity prices that may drive multiple distortions.

As an example of the value and efficiency of such regulation, the British regulator OFGEM has defined regulation through principles as a core value of its Forward Work Programme for 2017-2018. The decision to move towards a less prescriptive environment is explicitly motivated as a way to encourage innovation and to put responsibility on suppliers to deliver good consumer outcomes. A consultation launched by OFGEM in May 2018 explicitly supports principle-based regulation as way to “provide better protection for all consumers, including the vulnerable, foster an environment where they get engaging, informative and useful communications, and provide room for suppliers to innovate”¹. Eurelectric is very pleased to see that the need for more principles based regulation is being addressed, and calls CEER to implement a similar approach.

Regarding the adoption of regulatory models to the energy transition, Eurelectric would be pleased if the issue of tariff design mentioned by CEER could be properly addressed. The question of tariff structure has to be specifically tackled in order to avoid undue discrimination. The way network charges and levies are currently charged to consumers is leading to a mismatch between the structures of those regulated charges and their underlying costs. If most of these charges are charged as volumetric and are linked to the amount of the energy consumed by consumer, the amount that in reality needs to be

¹ OFGEM – Policy consultation: Domestic supplier - customer communications rulebook reform- May 2018

recovered is largely fixed and unrelated to consumption. Regulators should therefore enhance the evolution of the network tariff structure from a “kWh” towards “kW” structure. This new regulatory framework would allow retail price to reflect the scarcity of firm capacity and flexibility or incentivise the use of electricity at times of abundant decarbonised production, including remuneration frameworks for DSOs incentivising the investment in smart grids and in innovative solutions. Moreover, in the context of the decentralization of the system and with the appearance of new market actors, the tariff design review should also ensure that there is no positive discrimination in the market and that all users, included distributed energy sources, bear the costs they generate on networks.

2. DRAFT CEER WORK ITEMS FOR 2019

1. Status Review with a focus on the gap- analysis for the Roadmap to 2025 for Well Functioning Retail Energy Markets

- *Does this work item contribute to the achievement of CEER’s 3D strategy?*

Yes.

- *Is this deliverable important? Please indicate the deliverables you consider as “very important”, “important” or “not important”.*

Very important.

- *For the deliverables with public consultations, public hearings, workshops etc. do you intend to actively participate?*

Yes we do, as active participants.

- *Do you have any specific comments on any of this individual deliverables?*

Eurelectric supports the status review that CEER is planning to perform on the Roadmap to 2025 for Well-Functioning Retail Energy Markets. This will contribute to achieving the primary duty of regulators in their monitoring of retail markets. However, as explained in the Roadmap document², it mainly relies on self-assessment of the state of their national markets by NRA. In order to be efficient, these evaluations need to be operated on the basis of sufficiently relevant indicators, while avoiding unnecessary reporting obligations on energy companies and regulators. We therefore suggest CEER prioritises a number of key metrics as ‘must-have’. Therefore others metrics should be optional.

2. ACER/CEER Market Monitoring Report on Consumer Empowerment and Protection Chapter

² CEER - Roadmap to 2025 Well-Functioning Retail Energy Markets – February 2018

- *Does this work item contribute to the achievement of CEER’s 3D strategy?*

Yes.

- *Is this deliverable important? Please indicate the deliverables you consider as “very important”, “important” or “not important”.*

Very important.

- *For the deliverables with public consultations, public hearings, workshops etc. do you intend to actively participate?*

Yes we do, as active participants.

- *Do you have any specific comments on any of this individual deliverables?*

We highly value the chapter dedicated to consumer related issues in the Market Monitoring Report. In the context of the increasing role of consumers in the energy market, this report provides a very useful input for evidence-based discussion on major issues related to consumers such as complaint handling, switching and billing processes, customer information, as well as retail prices.

3. Retail Market Monitoring Report

- *Does this work item contribute to the achievement of CEER’s 3D strategy?*

Yes.

- *Is this deliverable important? Please indicate the deliverables you consider as “very important”, “important” or “not important”.*

Very important.

- *For the deliverables with public consultations, public hearings, workshops etc. do you intend to actively participate?*

Yes we do, as active participants.

- *Do you have any specific comments on any of this individual deliverables?*

In addition to the previous “Consumer” chapter, the Retail Market Monitoring Report represents a very helpful document for the understanding of the retail market functioning.

4. Recommendations on Dynamic Price Implementation

- *Does this work item contribute to the achievement of CEER's 3D strategy?*

Yes.

- *Is this deliverable important? Please indicate the deliverables you consider as "very important", "important" or "not important".*

Important.

- *For the deliverables with public consultations, public hearings, workshops etc. do you intend to actively participate?*

Yes, as active participants.

- *Do you have any specific comments on any of this individual deliverables?*

Eurelectric supports CEER's intention to address the issue of Dynamic Pricing. In line with our positioning on the Clean Energy Package, we believe that customers should be able to choose a dynamic pricing offer should they wish to and suppliers should be free to decide if and how to include those offers in their product portfolio. Imposing an obligation on some or all retail offerings would indeed be detrimental to competition and innovation, as it could create entry barriers for small suppliers. We also think that not only real time pricing but also advanced forms of time-of-use and critical peak pricing should qualify as dynamic pricing.

5. Status Review on Regulating Innovation in the gas sector

- *Does this work item contribute to the achievement of CEER's 3D strategy?*

Yes.

- *Is this deliverable important? Please indicate the deliverables you consider as "very important", "important" or "not important".*

Very important.

- *For the deliverables with public consultations, public hearings, workshops etc. do you intend to actively participate?*

Yes, as active participants.

- *Do you have any specific comments on any of this individual deliverables?*

Following the recent FROG study on the Future Role of Gas, Eurelectric invites CEER to proceed further its work on this file, in order to investigate in detail, from a regulatory perspective, the role gas could play in the decarbonisation process by

2050, especially renewable and decarbonised gases, and particularly regarding interactions with electricity. Therefore, Eurelectric invites CEER to launch further works on the regulatory measures which should be set for gas infrastructures and gas market design within the scope of decarbonisation and energy transition.

As pointed out by CEER, the role of innovation in this context is of course essential. However, given numerous uncertainties related to the evolution of gas demand and the technological breakthroughs that will appear, setting up a flexible and dynamic regulatory framework is of utmost importance to be able to adapt gas markets to the potential disruptive changes to come, in a cost-effective and efficient manner.

6. Report on Gas Infrastructures and the Energy transition: An analysis of needs and economic evaluation of investments

- *Does this work item contribute to the achievement of CEER's 3D strategy?*

Yes.

- *Is this deliverable important? Please indicate the deliverables you consider as "very important", "important" or "not important".*

Important.

- *For the deliverables with public consultations, public hearings, workshops etc. do you intend to actively participate?*

Yes, as active participants.

- *Do you have any specific comments on any of this individual deliverables?*

Eurelectric believes that a regulatory approach for gas infrastructure is essential for the European security of supply as a whole. The report foreseen in CEER Work Programme should specifically address the need for a serious gas market design review, as the current one does not suffice to ensure long-term availability of the gas infrastructures required for both security of supply and flexibility needs. Moreover, the foreseen report should also focus on the growing interdependency between gas and electricity, which means that the cross-commodity dimension must be strengthened in the energy sector and that a "whole system" approach be encouraged.

7. Report on Investment Signals with increasing RES penetration :

- *Does this work item contribute to the achievement of CEER's 3D strategy?*

Yes.

- *Is this deliverable important? Please indicate the deliverables you consider as “very important”, “important” or “not important”.*

Very important.

- *For the deliverables with public consultations, public hearings, workshops etc. do you intend to actively participate?*

Yes, as active participants.

- *Do you have any specific comments on any of this individual deliverables?*

Significant investments are necessary in clean generation, storage, networks and customer equipment. However, for the time being, the low level of commodity prices and time spreads and the existence of “political” phase-out calendars rather than market-based solutions deter some operators from efficient investment decisions. Indeed, there are currently inadequate price signals for both the closure of existing production plants and new investment (either in existing or new capacities). There is therefore a risk of obsolescence in generation, and sufficient associated grids due to depressed economic signals.

In addition to giving appropriate investment (and disinvestment) signals, well-functioning energy markets should aim at ensuring competition between technologies, in order to foster innovation in both technologies and business models. From this perspective, Eurelectric agrees that *“the capability of wholesale energy markets as they are currently designed to provide economic signals capable of ensuring appropriate perspectives of cost recovery to new assets (and in our view, also to existing assets) and, hence, of triggering investment decisions”* needs to be assessed, and welcomes CEER initiative to work on a future Report on Investment Signals European part of CEER Work Programme

8. Benchmarking Report on Power Losses :

- *Does this work item contribute to the achievement of CEER’s 3D strategy?*

Yes.

- *Is this deliverable important? Please indicate the deliverables you consider as “very important”, “important” or “not important”.*

Important.

- *For the deliverables with public consultations, public hearings, workshops etc. do you intend to actively participate?*

- *Do you have any specific comments on any of this individual deliverables?*

This report can provide a valuable contribution. However, it might be difficult to make valid comparisons between Member States with such different regulatory and market structures.

9. Report on Investment Conditions 2019 :

- *Does this work item contribute to the achievement of CEER's 3D strategy?*
- *Is this deliverable important? Please indicate the deliverables you consider as "very important", "important" or "not important".*
- *For the deliverables with public consultations, public hearings, workshops etc. do you intend to actively participate?*
- *Do you have any specific comments on any of this individual deliverables?*

10. 7th CEER Benchmarking Report on Quality of Electricity and Gas Supply

- *Does this work item contribute to the achievement of CEER's 3D strategy?*
Yes.
- *Is this deliverable important? Please indicate the deliverables you consider as "very important", "important" or "not important".*
Important.
- *For the deliverables with public consultations, public hearings, workshops etc. do you intend to actively participate?*
- *Do you have any specific comments on any of this individual deliverables?*

11. Paper on Smart Economic Regulation of DSOs

- *Does this work item contribute to the achievement of CEER's 3D strategy?*
Yes.
- *Is this deliverable important? Please indicate the deliverables you consider as "very important", "important" or "not important".*
Very important.
- *For the deliverables with public consultations, public hearings, workshops etc. do you intend to actively participate?*
Yes, as active participants.

- *Do you have any specific comments on any of this individual deliverables?*

We regard this topic as of highest importance and welcome CEER's plan to develop such a paper. In view of the increasing amounts of distributed generation connected at distribution level and the appearance of new grid users such as prosumers and distributed storage facilities, there is an urgent need to revise current incentive frameworks and make them fit for implementing the necessary innovative investments to support the evolution of DSOs.

In this context, what is now missing are adequate remuneration mechanisms to support this transformation towards more active and smarter grid operation and investments. European Regulators should therefore define forward-looking incentive regulations based on key principles. First, it should ensure a good level of predictability and stability, as well as being transparent and understandable for all users. Moreover, regulators should also give DSOs the freedom to choose the most efficient investment and remove any incentives that might prioritise infrastructure development over more active use of flexibility³.

12. Report on Digitalisation and the DSO

- *Does this work item contribute to the achievement of CEER's 3D strategy?*

Yes.

- *Is this deliverable important? Please indicate the deliverables you consider as "very important", "important" or "not important".*

Very important.

- *For the deliverables with public consultations, public hearings, workshops etc. do you intend to actively participate?*

Yes, as active participants.

- *Do you have any specific comments on any of this individual deliverables?*

Eurelectric supports CEER's intention to address the issues associated with DSO and digitalisation, while highlighting the fact that the topic of digitalisation in the energy sector is extremely broad and that the scope of this deliverable should be carefully defined. It is essential that European regulators define a relevant regulatory framework so as to allow for an efficient supervision and support for the new role of DSO as 'data manager', consistently with their broader role of 'neutral market facilitator'.

³ See Eurelectric - Innovation incentives for DSOs - a must in the new energy market development

At the same time there are real opportunities for the networks to utilise digitalised data to improve operational efficiencies and services to customers via a range of new technologies that will form the backbone of the smart grid, including Smart Meters. Moreover, data privacy and protection is a key topic for consideration for industry overall and needless to say, this brings new reputation and legal risks if not treated properly.

In continuation of its report on digitalisation in the power sector⁴, Eurelectric is committed to help regulators efficiently address this new challenge.

13. Report on Decarbonisation Developments in the DS Grid

- *Does this work item contribute to the achievement of CEER's 3D strategy?*

Yes.

- *Is this deliverable important? Please indicate the deliverables you consider as "very important", "important" or "not important".*

Important.

- *For the deliverables with public consultations, public hearings, workshops etc. do you intend to actively participate?*

Yes, as active participants.

- *Do you have any specific comments on any of this individual deliverables?*

Eurelectric supports the general objective of this report, while underlining potential overlaps with the envisaged 'Paper on Smart Economic Regulation of DSOs'. To be most useful, the scope of this deliverable should be further defined. CEER should clarify if this deliverable aims at projecting DS grid development scenarios including the impact of sector coupling and potential use of hydrogen and in what form (quantitative in terms of investment costs or other). Eurelectric would support this approach.

We fully agree with the view that these developments require NRAs to rethink what a fair distribution of costs would be. However, we would welcome it if these recommendations could be captured under one single work item, e.g. in the CEER Paper on Smart Economic Regulation of DSOs as outlined above. Moreover, Eurelectric is currently finalising a major decarbonisation study up to 2050⁵ and we would be pleased if CEER could include this as a reference point for its upcoming report.

⁴ 'Eurelectric - The power sector goes digital - Next generation data management for energy consumers – May 2016

⁵ Eurelectric – Decarbonization Pathways – June 2018

14. Report on Procedures of Procurement of Flexibility

- *Does this work item contribute to the achievement of CEER's 3D strategy?*

Yes.

- *Is this deliverable important? Please indicate the deliverables you consider as "very important", "important" or "not important".*

Very important.

- *For the deliverables with public consultations, public hearings, workshops etc. do you intend to actively participate?*

Yes, as active participants.

- *Do you have any specific comments on any of this individual deliverables?*

Eurelectric welcomes this item as we did with CEER's previous discussion papers on this matter. As DSOs play a more active role in system management, it is essential that regulators define appropriate guidelines for the use of flexibility by DSOs and for procedures of procurement. Clear guidance from NRAs is needed to avoid any market distortions when DSOs need to procure flexibility for grid operation purposes.

It should be noted that where electricity DSOs have arrangements in place with customers for flexibility services they will need priority access to these services at times of grid constraint to handle congestion, maintain grid stability and secure grid operations. As many sources of flexibility are replacing what was historically on the transmission system, a 'whole system' has to be adopted to avoid creating unintended consequences. .

Following our position papers on the Clean Energy Package, Eurelectric supports the procurement of flexibility services through market flexibility providers, while allowing DSOs to own and operate flexibility assets in some exceptional situations and for very specific applications aiming at ensuring system operation⁶.

15. Partnership for the Enforcement of European Rights (PEER) - Report on national models of cooperation among different sectoral regulators in the context of consumer law enforcement

16. Partnership for the Enforcement of European Rights (PEER) - Bundled Products Regulatory Roundtable

⁶ cedec/edso/eurelectric/geode - Flexibility in the energy transition a toolbox for electricity DSO

17. Partnership for the Enforcement of European Rights (PEER) - Cyber Security Regulatory Workshop

- *Does this work item contribute to the achievement of CEER's 3D strategy?*

Yes.

- *Is this deliverable important? Please indicate the deliverables you consider as "very important", "important" or "not important".*

Very important.

- *For the deliverables with public consultations, public hearings, workshops etc. do you intend to actively participate?*

Yes, as active participants.

- *Do you have any specific comments on any of this individual deliverables?*

Eurelectric welcomes the initiative for the Partnership for the Enforcement of Energy Rights (PEER), aiming at promoting a cross-sectoral cooperation at EU level between NRAs, consumer protection agencies and other involved actors. This reinforced cooperation will directly contribute to further protecting consumer's protection, and will also help guaranteeing a level playing field for market players, even if such players come from other sectors.

Eurelectric will therefore closely follow the progress of the 3 deliverables included in CEER Work Programme in the frame of PEER as useful steps to lead this strategy.

■ Eurelectric pursues in all its activities the application of the following sustainable development values:

Economic Development

Growth, added-value, efficiency

Environmental Leadership

■ Commitment, innovation, pro-activeness

Social Responsibility



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