

Brussels, 10 March 2026  
(OR. en)

7214/26  
ADD 1

ENER 126  
FISC 103  
ECOFIN 325  
COMPET 308  
ENV 229

**COVER NOTE**

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From: Secretary-General of the European Commission, signed by Ms Martine DEPREZ, Director

date of receipt: 10 March 2026

To: Ms Thérèse BLANCHET, Secretary-General of the Council of the European Union

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No. Cion doc.: SWD(2026) 115 final

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Subject: COMMISSION STAFF WORKING DOCUMENT STAKEHOLDER CONSULTATION - SYNOPSIS REPORT Synopsis report on the consultation activities for the development of the Citizens Energy Package Accompanying the document Communication from the Commission to the European Parliament and the Council on the Citizens Energy Package

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Delegations will find attached document SWD(2026) 115 final.

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Encl.: SWD(2026) 115 final



Strasbourg, 10.3.2026  
SWD(2026) 115 final

**COMMISSION STAFF WORKING DOCUMENT**  
**STAKEHOLDER CONSULTATION - SYNOPSIS REPORT**

**Synopsis report on the consultation activities for the development of the Citizens Energy Package**

*Accompanying the document*

**Communication from the Commission to the European Parliament and the Council on the**

**Citizens Energy Package**

{COM(2026) 115 final}

## **Synopsis report on the consultation activities for developing the Citizens Energy Package**

*This document should be regarded merely as a summary of the contributions made by stakeholders to the consultation activities on the Citizens Energy Package. It may not in any circumstances be regarded as the official position of the Commission or of its staff. Responses to the consultation activities cannot be considered to be a representative sample of the views of the EU population.*

### **1. Objectives of the consultation**

The Citizens' Energy Package for a Just Transition and Consumer Empowerment aims to set out a clear policy vision to place citizens at the heart of EU energy policy, ensuring that no one – especially the energy-poor, vulnerable populations or regions disproportionately affected by the transition – is left behind in the move toward a greener, fairer energy system.

An essential part of the affordable energy action plan, the package aims to reduce energy poverty, promote access to renewable energy and energy efficiency, and create opportunities linked to net-zero industries. It is based on three key objectives: reinforcing the just transition principle, enabling active consumers to participate in energy markets – both individually as active customers and collectively through energy communities – and ensuring energy affordability throughout the EU.

By strengthening consumer trust in the market, encouraging supplier switching, and improving access to innovative services, the package fosters a more dynamic, inclusive, and consumer-driven energy market. It also supports the Clean Industrial Deal and is aligned with EU electrification and digitalization strategies, ensuring that these are delivered in a consumer-friendly manner. Crucially, its success will depend on effective implementation of existing EU legislation by Member States, guided by the guidance documents in the package and supported by improved information, awareness-raising campaigns, and local engagement – empowering millions of people to take an active role in the energy transition, while avoiding added burdens for businesses.

Public feedback will guide the Commission in helping Member States effectively apply consumer protection rules on the ground.

As the Citizens Energy Package focusses on citizens and implementation on the ground it was necessary to devise a broad and comprehensive consultative strategy. In addition to an open public consultation and call for evidence on the Citizens' Energy Package, several targeted consultations on the related guidance documents as well as the European Citizens' Panel on Energy Efficiency were launched. These targeted key stakeholders including Member States, regulators, consumer organizations, industry, local and regional authorities, civil society, and citizens. This facilitated broad understanding and ownership of the initiative among key stakeholders. It sought to gather input to shape the package's priority areas and actions, complementing feedback already collected through stakeholder engagement in 2024, such as the Citizens Energy Forum and the regulatory roundtable. This process was part of wider engagement efforts to ensure that the package reflects the needs and perspectives of all stakeholders on all topics. The following section will touch on the different initiatives and their methodologies.

## **2. Consultation activities and methodology**

### **2.1. Targeted stakeholder consultations – Informal working group on consumers**

The DG ENER informal working group on energy consumers brought together key stakeholders from across the energy sector – including representatives of consumers, regulators, suppliers, and distribution system operators (DSOs) – to discuss and provide input on the upcoming Citizens Energy Package (CEP). This collaborative forum aimed to gather diverse perspectives to help shape the development of the CEP and ensure that it addresses the concerns and needs of all parties involved. The focus lay heavily on providing input for the recommendations that are part of the Citizens Energy Package.

In January 2025, DG ENER distributed a questionnaire to the working group members, which include CEER, BEUC, Eurelectric, Eurogas, EER, CEDEC, E.DSO, the EU DSO Entity and GEODE. The group provided detailed feedback and wrote reports focusing on five key topics critical to the CEP guidance documents: protection from disconnection, safeguarding vulnerable customers during the gas phaseout, supplier risk management, energy sharing and energy communities, and the clarity and transparency of energy offers. The working group met three times in early 2025, on 20 January, 2 April, and 5 June, to discuss these issues and shared its views with the Commission through informal reports, which were taken into account in the guidance documents of the package.

### **2.2. Targeted stakeholder consultations – Member States**

#### **Member State targeted consultation**

All Member States were invited to join a session on the CEP on 12 May 2025. The central idea of the package was presented, and clarification on the planned guidance was provided. Following this session a questionnaire was sent out using the EUSurvey tool. A reminder was also shared on a previous questionnaire relating to the energy poverty coordination group, which tackled the remaining topics of the CEP.

This questionnaire consisted of the following three sections:

- 1) active customers, energy sharing and energy communities;
- 2) ensuring understandable and comparable pre-contractual information;
- 3) supplier risk management.

This questionnaire received 11 replies (**BE, DE, IE, LT, LU, MT, NL, AT, PT, RO, FI and SE**). The replies were processed and provided valuable input for the CEP. On 23 of June, a follow-up session ensued in which the Commission presented the results, followed by a debate. Further clarification on the CEP was provided. No Member State raised any objection to the summary, the package or its accompanying documents.

#### **Energy poverty coordination group and stakeholders contact group**

A questionnaire focusing on disconnections and the protection of vulnerable customers and customers in energy poverty, and another on the guidance on gas phase-out were drawn up and sent by email to the informal DG ENER stakeholder contact group on energy poverty (with around 35 members, mainly representing NGOs such as CAN Europe, EAPN, EYEN, FEANTSA, Housing Europe and IUT; energy suppliers such as Eurelectric and Eurogas; consumer organisations such as BEUC; and think tanks such as the EPC and IDDRI). By the

deadline of 18 February, 19 replies had been received. Some stakeholders completed the questionnaire jointly in groups.

The questionnaires were also presented to the Member States at the meeting of the coordination group on energy poverty and vulnerable consumers on 4 February 2025. The Commission received completed questionnaires from 12 Member States: **AT, BE, DK, DE, IE, ES, FR, LT, HU, MT, NL and PT**. The results of all questionnaires were presented at the following coordination group meeting on 1 July 2025. A follow-up meeting with stakeholders was also organised on 10 April 2025 to discuss the results. Overall, no objections were raised, and the work on the guidance documents was welcomed.

### **2.3. Open public consultation and call for evidence**

#### **A. Open public consultation**

Between 19 June and 11 September 2025, the Commission ran an open public consultation to gather feedback for its upcoming Citizens' Energy Package. The feedback was published on the Commission 'Have your say' web page, and the survey was run using the EUSurvey tool. The questionnaire contained a total of 29 questions spread over the following three sections: 1) the just transition and energy poverty; 2) consumer empowerment; and 3) consumer protection, affordability and public acceptance. All three sections contained a free text field in which respondents could add comments. It was not mandatory to respond to all questions, so all participants had the option of responding only to the questions of relevance to them.

The open public consultation received 107 submissions from a wide range of respondents through the 'Have your say' portal, and a further nine completed questionnaires were submitted late. Feedback was received on all topics covered by the package.

#### **B. Call for evidence**

Between 19 June and 11 September 2025, the Commission also ran a call for evidence to gather feedback for its upcoming Citizens' Energy Package. The purpose of this consultation was to obtain information and receive comments and proposals on the planned initiatives the protection of citizens and their participation in the energy market. The consultation addressed both the general public and key energy stakeholders. In order to be successful, the Citizens' Energy Package needs wider ownership based on real engagement with stakeholders. All respondents could add comments in a free text field and upload a document or position paper.

The call for evidence received 122 submissions from a wide range of respondents through the 'Have your say' portal, and a further four contributions were submitted late. Feedback was received on all topics covered by the package.

In total three responses to the call for evidence were moderated: two for breach of feedback rules and one at the request of the stakeholder.

### **3. Key conclusions (per focus area)**

#### **Scope of Citizens' Energy Package – Protecting and empowering consumers in the just transition**

Respondents expressed broad support for the package and made many proposals on how its main objectives should be pursued. Some proposals concerned **affordability**: many households

and businesses stressed that energy is not a commodity but a basic need, requiring protective measures, including reform of energy taxation (e.g. reducing electricity taxes to minimum levels EU, restructuring levies) and set targeted relief mechanisms (revenues from ETS2 and the Social Climate Fund to flow back to citizens via direct support). A lack of understanding of the different tariff options; and limited price visibility (consumers often lack real-time access to pricing information, making it more difficult for them to optimise consumption or switch suppliers when cheaper offers arise) were said to be major issues. The concept of 'green contracts' should be introduced in national law, as they are expected to play a fundamental role in cost-efficient decarbonisation. Some responses highlighted that Member States are supporting the expansion of biomethane production by providing financial incentives and cutting red tape for permitting. Member States should prioritise digitalisation and flexibility in distribution grids, ensuring that competitive offers are backed by a system that can deliver them efficiently. Some stressed that cross-subsidisation may lead to inequity, as for below-cost tariffs, the gap is covered by other market participants or public funds, leading to inefficiencies and unfair cost distribution among consumers.

**Numerous proposals aim to reduce energy poverty** and some seek to embed social fairness in all EU energy and climate frameworks. The specific measures proposed include boosting deep building renovation through EU-level incentive schemes tied to efficiency gains and integration of renovation policies with demand-side flexibility; setting ring-fenced funds for vulnerable consumers; and national and local governments providing targeted financing and advisory services and setting tenant-focused legislation. Integrate disability into policy design, implementation and monitoring was also said to be an important step. Preventing disconnections was often stressed, informing the Commission Recommendation accompanying the package addressing disconnections. The lack of awareness and visibility of clean, decentralised heating solutions, such as solar thermal were also stressed.

A strong call was made **to empower citizens and communities as active participants** in the energy transition through proposals for a minimum percentage grant for energy communities' infrastructure, integrating community-led data into governance frameworks and ensuring privacy, ownership rights, and transparency. Municipalities should work with social organizations (e.g. schools, churches, NGOs) to engage harder-to-reach citizens. Trust is an essential requirement for consumer participation in and acceptance of the energy transition. Clarity and comparability of possibly standardised templates for energy contracts and bills were specified as a way of improving consumer protection. The Commission recommendation on precontractual information reflects this call for intervention. Many stakeholders called for the Electricity Market Design Directive, recast Gas Directive and Energy Performance of Buildings Directive to be implemented swiftly. Some stressed the importance of maintaining technological neutrality and a diverse energy mix (renewables, biomethane, hydrogen, electricity). Others emphasised fair, planned decommissioning of fossil gas infrastructure, with prior communication, compensation for stranded assets and protections for vulnerable consumers. Citizens need to be empowered at all levels of **governance**. At the EU level, citizens must be empowered by the legal framework. The national level is needed to implement dynamic tariffs, net metering and fair remuneration, to channel ETS revenues to vulnerable citizens and to provide regulatory sandboxes for testing innovative solutions and ambitious efficiency targets. The local level is essential to carry out targeted awareness-raising campaigns, support energy communities and promote the embedding of youth and consumer representation in energy governance.

## **Guidance on protection against disconnection**

Member States underlined that most of them already have protective measures in place, including winter disconnection bans, minimum energy provision or mandatory payment plans. At the same time, they stressed the importance of subsidiarity and that disconnection policy should remain a national competence, tailored to local conditions. The feedback received showed that practices differ between Member States, from the identification of vulnerable customers to disconnection procedures and financing models. For example, some countries extend protection to all households during certain periods, while others restrict it to customers formally registered as vulnerable.

Public and private stakeholders generally argued for strong, EU-wide guarantees. Many emphasized that access to a minimum level of energy should be treated as a basic right, and disconnection of vulnerable customers should be legally prohibited. Special attention was drawn to safeguards such as advance notice before disconnection, individual assessment of vulnerability (including health, income and disability status), and moratoria during winter or periods of extreme weather. There was no clear consensus on who should finance such protections, with some pointing to suppliers, others to national budgets or EU funds.

Overall, it may be concluded that there is broad agreement that disconnection must be a measure of last resort and that safeguards such as notice periods, involvement of social services and seasonal bans are essential. The need for cooperation and coordination between different actors in the energy market was also highlighted. Both stakeholders and Member States recognise the challenges in financing protections and identifying vulnerable consumers effectively. The guidance on energy disconnections therefore highlights these issues, providing more clarity on the identification of vulnerable customers and the consequential targeting of measures, and emphasising aspects such as multi-actor and multi-level governance and the importance of social safeguards in the context of energy disconnections.

Several practices and examples were gathered through the formal and informal consultations, which were then used in the staff working document. Contributions also helped give the document its outline, for example in the distinction between prevention and protection measures against energy disconnections.

## **Guidance on the protection of energy-poor customers while planning and implementing the phase-out of natural gas**

There was broad agreement on the urgency of a just and inclusive energy transition, heavily emphasising the need to avoid leaving any citizen, particularly those in vulnerable situations, behind. Energy efficiency and reduced consumption are seen as crucial for addressing energy poverty and maintaining affordability throughout the transition. Stakeholders broadly agree on the need for increased communication, transparency, and public engagement to build trust and acceptance of renewable energy projects, with suggestions for benefit-sharing mechanisms to support local communities. Financial support is considered key to overcome the upfront investment cost of switching to alternative energy sources, especially for energy-poor and vulnerable households. That is why this guidance pays particular attention to these matters. Views differ on the role of gas infrastructure and renewable gases in a resilient energy system. This issue is not considered to be within the scope of this guidance.

## **Guidance on the summary of the key contractual terms and conditions**

The feedback received highlights a strong demand for clear, simple, and comparable energy offers. Stakeholders prioritise transparent communication, emphasising the importance of clear

and simple language, calling for concise terminology and seeking easy comparison of offers. Timely presentation of information is also considered crucial. The most critical information to be prominently displayed includes price, tariff information, contract duration, termination conditions, origin of energy, billing practices, and customer support. The results underscore the need for a standardised approach to information display, enabling consumers to make informed decisions and promoting transparency in key contractual elements.

Further feedback revealed a consensus among the representatives of key stakeholders on the main principles for the summary of key contractual conditions and the importance of clear, concise and user-friendly communication. Opinions, however, on the standardised templates and on how to provide and convey the key contractual information to consumers. The targeted consultation also pointed out some challenges such as energy literacy, hidden fees, and the role of intermediaries.

**Stakeholder opinions differing opinions on how to provide and convey contractual information.** The guidance therefore recommends that all relevant stakeholders are involved during the process so that the contractual summary is well designed.

### **Guidance on supplier risk management**

Key challenges highlighted by stakeholders during all consultative activities include divergent national approaches, the need to balance regulatory oversight with market functioning, concerns about liquidity in hedging markets, margin call risks and their impact on consumers, as well as clarification of the definitions in Article 18a of the Electricity Market Design Directive and its interaction with the Regulation on wholesale energy market integrity and transparency and the European Market Infrastructure Regulation.

**Contributions consistently emphasised the importance of allowing energy suppliers the autonomy to maintain diverse hedging strategies, and of not stifling competition.** Special consideration should be given to smaller entities such as energy communities, ensuring that they have access to appropriate hedging mechanisms. Proposed solutions **focus on implementing a risk-based supplier licensing system with balanced oversight, where suppliers undergo thorough financial resilience checks**, such as financial certifications, stress tests, and business model evaluations, **while retaining flexibility in hedging based on market conditions.** It was highlighted that stress tests should be proportionate and periodic without imposing excessive administrative burdens. Market liquidity must be ensured before imposing any hedging obligations, with transparent criteria to avoid market distortions or discouraging hedging activity.

Other contributions highlighted that **hedging is only one component of risk management.** Additionally, it was requested that it should be underlined that the article is limited to power markets, excluding gas suppliers. **A call for providing practical examples** of ‘general rules’ subject to regulatory review would increase clarity, while sharing best practices among regulators and using such exchanges as pedagogical tools for new entrants could strengthen the framework, foster healthy competition, and mitigate systemic risks. Accordingly, the guidance on supplier risk management aims to clarify definitions, to further explain how national regulatory authorities can employ hedging enforcement and to reflect on the use of stress tests and risk management in the broader perspective.

### **Guidance on energy communities**

The results focused **on prioritising support mechanisms for energy communities**, with legislation, funding and capacity building being considered most critical, and awareness raising

as an important crosscutting theme. **Funding** was highlighted as being particularly crucial, both in the early stages of energy community development and for the capital expenditure grants for concrete projects. Suggestions for support included **supporting secondary structures of energy communities or setting up one-stop shops (OSSs)**, including social criteria in public procurement, putting in place a dedicated guarantee facility for energy communities, and supporting municipalities through awareness raising and capacity building, particularly on heating and cooling projects. Other topics highlighted include redirecting fossil fuel subsidies to community projects, allowing energy communities to offer flexibility on relevant electricity markets and facilitating priority access to grids, reducing permitting times, and laying down rules on sharing the benefits of energy infrastructure projects.

Further feedback included the **intersection of energy communities with wider policy considerations** such as social inclusion metrics (e.g. tracking vulnerable households' participation) and technology integration (e.g. smart meters, digital twins). Cross-sectoral integration (e.g. linking energy with housing and rural development) and grid flexibility (e.g. dynamic tariffs, local flexibility markets) were also highlighted.

Additional input emphasised the importance of **support for heating and cooling projects**, as well as the overall need to expand grid capacity and involve energy communities in the process. Overall, quantitative targets for renewable capacity and qualitative goals for citizen engagement and social impact were both seen as equally important indicators of energy communities' contribution to the EU's clean energy goals.

### **Guidance on active consumers and energy sharing**

The contributions highlighted that **suppliers should have minimal involvement in energy sharing**, while any charges imposed must be evidence-based and cost-reflective. They emphasised the **need for transparent, clear, and easily navigable procedures** that enable consumers to engage in and benefit from energy sharing, supported by third-party organisers to manage complexity and simple, accessible single points of contact for consumer assistance. **Consumer protection should be proportionate and tailored to different energy-sharing models**, the actors involved and the size of projects. Ensuring accessibility for **groups in situations of vulnerability and tenants** through financial support and balcony solar technologies was also seen as important. At the same time, network tariffs should remain cost-reflective and be designed to optimise and reward local grid usage and respond effectively to market and system signals.

### **Social acceptance toolbox**

Public acceptance of renewable energy depends above all on whether citizens experience clear, tangible benefits. Many comments stressed that households must see lower bills, improved comfort, and simple procedures if they are to support the transition. Complex subsidy schemes, delayed disbursements, or hidden conditions undermine trust. To address affordability, respondents called for targeted financial measures such as social tariffs, revolving funds, stable subsidies, and in particular, rapid grant disbursement. A recurring theme was the demand for the fair sharing of benefits with local communities. While some stakeholders advocated voluntary, flexible models, many argued that EU-level mandatory frameworks are needed to ensure fairness and consistency.

Trust also depends on transparency and inclusive participation. Citizens expect open consultations, accessible advisory services, and early involvement in project planning. Recognition of contributions and transparent use of revenues are seen as crucial for legitimacy. Infrastructure and regulatory conditions are another priority: reliable and affordable grid

access, faster permitting, fair network tariffs, and reform of energy taxation to stop favouring fossil fuels were all mentioned as enabling conditions.

Inclusion emerges as a cross-cutting concern. Specific measures are needed to make renewables accessible for low-income households, tenants, and people with disabilities, ensuring equity across different social groups. Several comments highlighted tensions: individual versus collective benefit distribution, voluntary versus mandatory frameworks, and renewable versus nuclear pathways. Despite these divides, a strong message emerged that citizens want a fair, transparent, and empowering transition.

Lastly, contributions indicated that clear, consistent communication of renewables as drivers of lower costs, energy security and local prosperity, combined with efforts to counter disinformation, are seen as decisive for long-term acceptance. Overall, public acceptance is not automatic. It must be earned through fairness, visibility of benefits, and building trust at both household and community level.

### **Guidance on flexibility**

**Flexibility and flexible supply retail contracts** attracted strong engagement in the Citizens' Energy Package consultation. Respondents broadly recognized the value of flexible systems, citing benefits for the integration of renewables, grid stability, efficiency and lower costs. Enabling conditions such as smart meters, incentives, clear regulatory frameworks and awareness-raising measures were widely supported, though not always seen as urgent priorities, pointing to differences in emphasis across groups. The main barriers highlighted were gaps in smart metering and data access, uneven regulation across Member States, and the limited availability of dynamic or hybrid products. On consumer protection, transparency tools, including clear contracts, comparison instruments and data access, drew broad consensus, while more interventionist safeguards such as price caps or risk sharing exposed sharp divides. NGOs, consumer organisations and citizens called for stronger protections, particularly for vulnerable households, whereas business actors cautioned against blunt measures and favoured lighter, targeted approaches. Public authorities often took the middle ground, emphasising proportionality and systematic monitoring. Overall, the consultation confirmed a **consensus on the enablers of flexibility** but revealed **divergence on the extent of consumer protections versus preserving market efficiency**. Accordingly, the **guidance on flexible retail contracts** under the Citizens' Energy Package **reflects this balance**, seeking to build trust and fairness for consumers while safeguarding effective price signals in retail markets.

## **4. Identified campaigns and ad-hoc contributions**

No campaigns have been identified in the context of the open public consultation. Several documents, position papers and late / ad-hoc replies were provided in association with the open public consultation. These were included as part of the evidence base for this work but not in the official statistics.

## **5. European Citizens' Panel on Energy Efficiency**

In spring 2024, the European Commission convened a European Citizens' Panel on Energy Efficiency bringing together 150 randomly selected European citizens to discuss how energy is used in the EU and how the energy system may change in the future.

After three weekends of deliberations, the Citizens' Panel adopted a list of 13 recommendations<sup>1</sup> to feed into upcoming EU initiatives on different aspects of energy efficiency and the transition towards renewable energy sources.

The Panel's recommendations focussed in particular on empowering consumers, financing home renovations, and promoting education and job training in energy efficiency sectors aiming at future improvements in energy use, contributing to environmental sustainability, economic resilience and social equity.

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<sup>1</sup> Recommendations European Citizens' Panel Energy Efficiency, se: [52a3608d-662c-4b0e-b463-684a9dbef302\\_en](#)