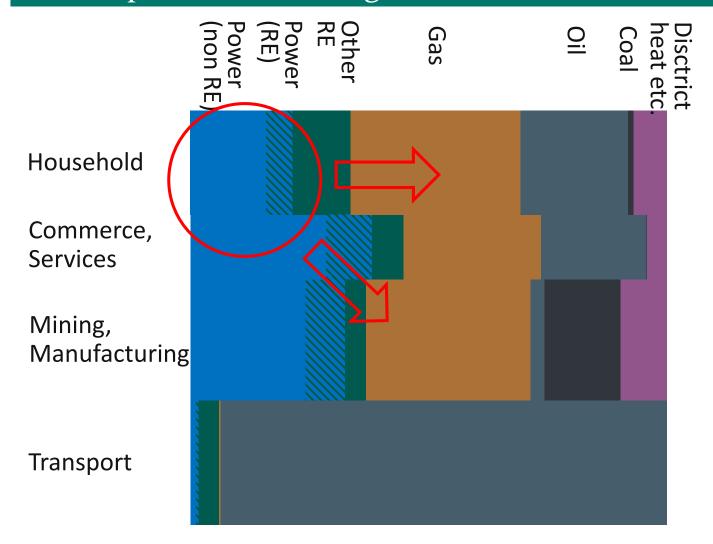


Energy security and climate targets need energy efficiency and replacement of oil, gas, coal with renewable electricity



Allow consumers to contribute Renewables and Flexibility to system



A shift from consumers to prosumers is important – they are needed as part of the electricity system

"Farmers harvest, eat, store, and sell ..."

How can prosumers meet own AND system needs?

- support for RE not limited to self-consumption
- ensure storage responds also to system scarcity/surplus
- local energy communities engage consumers, link to system



Regulation of retail markets needs to respond to observed shortcomings and new policy objectives

- Retailers charge high mark-ups to less-sophisticated customers
 - -> EMD, Art. 5, should NOT prevent MS from regulating prices
- Retails should be encouraged to offer 1-3 year contracts to customers
 - Consumers have more stable bills, and benefits from switching last
 - Retailers contract longer-term, good for invest in generation, flex.
 - -> EMD, Art. 12.3, adjusted wholesale prices since initial contract should be INCLUDED in direct economic loss for termination fee
- Policy objective was to create competitors to incumbents utilities
 - Less important with vertical unbundling and cross-border auctions
 - Create flexibility incentives (Art 11 requirement for dynamic pricing)



Creating competitive market for demand side management is warranted – but requires pro-active regulatory approach

- Important to engage consumers on flexibility
 - Can retailers offer tailored solutions (ranked 28 of 31 in services)?
 - Competition among third parties demand side providers important
- EMD creates environment for third parties to access flexibility
 - Third party does not require consent of retailer (Art 13)
 - No compensation payment (Art 17.3d) unless regulated (Art 17.4)
- Wholesale and balancing markets also needs to be fit for flexibility
 - EMD 17.1: only 'encourages' participation of demand flexibility
 - EMR 6.3: leaves 'Market operators free to develop products ... '
 - -> Require market operators to use auctions with capability based bids

Summary

- A shift from consumers to prosumers is important they are needed as part of the electricity system
- Regulation of retail markets needs to respond to observed shortcomings and new policy objectives
- Creating competitive market for demand side management requires pro-active regulatory approach





DIW Berlin — Deutsches Institut für Wirtschaftsforschung e.V. Mohrenstraße 58, 10117 Berlin www.diw.de

Karsten Neuhoff Kneuhoff@diw.de