

## Eurogas Reaction to the Citizens Energy Package

24 March 2026

Eurogas welcomes the publication of the Citizen Energy Package. The initiative represents an important step toward empowering consumers to actively participate in the energy transition, addressing energy poverty, and ensuring affordable energy for all. Eurogas stands ready to engage with the Commission in the development of upcoming guidance and implementing measures to ensure that future frameworks remain pragmatic, market-based and technology-neutral, and leave no-one behind.

We greet the Commission's intention to further back Member States in strengthening their national energy and climate plans and developing *Energy Performance of Buildings Directive* (EPBD) aligned renovation plans. These set the ground stones for the decarbonisation of the European building stock. We equally value the recognition of energy poverty as a multifaceted issue. Acknowledging its complexity is essential, as it calls for a diverse set of solutions that can respond to the different conditions and needs of citizens.

Eurogas prizes the righteous recognition of biogas and biomethane as enablers for developing energy communities in rural areas. Supporting self-production and energy sharing will strengthen local communities' autonomy and empowerment, contributing to more affordable energy for citizens. These solutions also help reduce emissions in the agricultural and biowaste sectors and play a key role in meeting the REPowerEU objective of reaching 35 bcm of biomethane production by 2030. However, the added value of biomethane for the decarbonisation of the energy sector goes beyond energy communities. Biomethane is a domestically produced alternative to natural gas, that can be injected into the grid and further support the decarbonisation of buildings and industries connected to the European grid. Biomethane plays an even more crucial role in the residential sector and industries where no economically and technically viable alternative solutions are available. Moreover, as a decentralised renewable energy, combined with locally produced electric renewables, it contributes to the resilience of local energy system to new risks such as more extreme climatic events or geostrategic risks (from high prices to cyber and other attacks).

We also welcome the ambition of the European Commission to introduce a code of service for energy suppliers as a step toward strengthening consumer trust. Collaboration between consumer associations, suppliers and regulators will be key to building an effective and voluntary framework that supports strong consumer protection standards.

Alongside these promising developments, we believe that several elements would benefit from further discussion. Eurogas remains in this regard committed to contributing actively to an inclusive dialogue to support greater citizen energy empowerment.

### **1. Embracing all technologies contributing to Europe's decarbonisation**

Regarding the economic sustainability of household energy consumption, consumers must retain the right to choose among a range of decarbonisation pathways suited to their circumstances, including renewable gases like biomethane. Preserving this technological optionality is essential: a one-size-fits-all approach risks undermining the value of the existing infrastructure, imposing unnecessary costs on households and foreclosing decarbonisation pathways that are technically sound, immediately deployable, affordable, and increase the local energy system resilience.

It is important that the Commission and Member States stick to the open energy approach set out in the *Energy Efficiency Directive* (EED) and the EPBD. Member States and citizens need to have the choice to adopt the most financially and technically suited solutions. Differences in climate, population density, geography and building characteristics require tailored solutions. Renewable gasses such as biomethane can play a fundamental role in the rapid decarbonisation of the existing building stock and industrial production, while also limiting the need for investments in new electricity transport and storage infrastructure, and enhancing Europe's energy resilience.

### **2. Further develop the consumer protection framework with a special regard for vulnerable households**

Eurogas considers it a priority to address the root causes of energy poverty and vulnerability. We welcome the planned cooperation between the Commission and relevant stakeholders, including energy suppliers, to establish national support schemes, setting-up early warning systems in case of payment difficulties and help prevent disconnections. In the spirit of the upcoming dialogue, we would like to underline the need for a balanced approach, carefully defining measures tackling energy poverty, preventing disconnections but also reducing risks for all involved parties.

It is therefore important that costs and opportunities for all solutions are carefully evaluated, at an individual (i.e. of specific dwellings), but also at a systemic level (i.e. infrastructure).

Eurogas recognises that energy transition may create challenges for consumers, in particular vulnerable households. It is therefore essential to ensure strong and targeted consumer protection frameworks, preventing disproportionate cost increases and ensuring that no household is left behind.

### **3. Transparency and comparability of supply contracts**

When looking at measures to improve the transparency and comparability of energy offers, while it is essential to combat fraud, spoofing, and unfair practices, it is also important to balance contractual harmonisation requirements, to allow companies to innovate by developing new formats and/or products.

Eurogas underlines the importance of ensuring that contracts are clear and comparable for consumers. In this context, a fully harmonised approach to pre-contractual information may prove challenging, given the diversity of national retail markets and consumer profiles. The wide range of energy offers also calls for a degree of flexibility in how information is communicated. Eurogas also highlights the importance of addressing potential regulatory gaps affecting comparison websites and brokers, with a view to ensuring a level playing field with suppliers' own information channels.

Eurogas highlights the increasing role expected from suppliers in delivering consumer-facing services. Any additional obligations should remain proportionate, cost-effective and compatible with well-functioning competitive markets.

The development of consumer-centric energy services relies on access to high-quality data and interoperable systems. Eurogas supports a coherent framework for data access and digitalisation, while ensuring data protection and avoiding unnecessary complexity.

### **4. Flexibility in risk-management and hedging strategies**

While the current EU framework has been recently and extensively modified in respect to gas storage with the specific aim to ensure security of supply, Eurogas recognises the critical role that protection against market volatility plays in ensuring energy market stability. It is worth noting, however, that hedging practices are already embedded in the risk policies of major energy suppliers, tailored to reflect the specific dynamics of their respective national markets. and that hedging practices are not without costs for end customers. Thus, the upcoming Commission's Guidance should refrain from being overly prescriptive, so as not to constrain the ability of all market participants (regardless of their size) to define their risk policies in the most suitable and protective way and Member

States to respond swiftly and effectively to evolving market conditions. Sufficient flexibility must be preserved to allow Member States to adapt recommendations to their individual market structures, regulatory capacities, and existing frameworks.