

The background of the entire page is a stylized, high-contrast image of a high-voltage power line tower. The tower's lattice structure is rendered in shades of blue and purple, creating a geometric pattern that fills the frame. The lines of the tower and the power cables it supports are prominent, with some cables showing multiple strands. The overall aesthetic is modern and industrial.

THE EU COMMISSION'S PROPOSAL FOR FUTURE- PROOF ELECTRICITY BILLS

AMPRION'S PERSPECTIVE

AUGUST 2026

THE EU COMMISSION'S PROPOSAL FOR FUTURE-PROOF ELECTRICITY BILLS

BACKGROUND/EUROPEAN LEGISLATIVE CONTEXT

In the context of the EU Commission's "AccelerateEU" communication in April 2026, the legal proposal on network charges and taxation should function as a key regulatory and financial underpinning for the EU's acceleration agenda in grids and electrification. Amprion supports AccelerateEU's aims to speed up grid build out and smart modernisation and to make electricity more attractive than fossil alternatives. Furthermore, we share and support ENTSO-E's initial comments on the EU Commission's proposal.

NEED FOR FORMAL CONSULTATION

Given the very broad scope of this legislation and its significant impact on network investments, a formal consultation and thorough impact assessment are absolutely required before proceeding.

1 CORE PRINCIPLES FOR GRID CHARGES AND TARIFFS (ART. 18)

We fully agree with the targets stated in the EU Commission's proposal for future-proof electricity bills. To ensure the energy system remains stable, affordable, and ready for the future, we advocate for the following principles regarding grid charges:

- **Incentivize Optimal Utilization:** System operators should be incentivized to ensure optimal grid utilization through flexibility, digitalization, smart grids, and smart meters. This is mainly implemented by incentive regulation by the NRAs and their assessment of the regulatory basis. Grid charges act as the remuneration scheme for operational costs and investments and have therefore only limited potential for incentivization.
- **Cost-Reflective and Dynamic Signals:** Charges should include clear, cost-reflective price signals for grid users. Especially for storage grid users it is essential, that market-based signals are accompanied by incentives for grid-friendly behaviour to avoid additional stress and congestions.
- **Use available connection capacity effectively (Art. 18 (2l) and Art. 18d):** We support the provision, that flexible connection agreements should be facilitated and the connection of new grid connection requests should be assessed according to the projects' maturity. The first come first serve principle has led to inefficiencies as many projects were not realized while others could not be connected. We deem the German maturity assessment as an adequate model to overcome this hurdle. If connection agreements are flexible, purely voluntary models are not effective, as – understandably – the attractiveness of such approach is limited. A more binding model with corresponding savings is more promising.

2

SCOPE REDUCTION: DATA AND BENCHMARKING (ART. 18.7)

We are fully committed to an affordable energy system and the need of efficiency of TSOs' operations. We would like to point out that efficiency requirements for the TSOs are already embedded in the national regulatory frameworks. An international benchmarking would therefore introduce an additional efficiency criterion, which might compete with national efficiency requirements, so that TSOs won't be able to fulfil both efficiency requirements. In addition, experience has shown that international TSO efficiency benchmarking models are not reliable and therefore do not produce usable insights. The German National Regulatory Authority (Bundesnetzagentur, BNetzA) has assessed the benefits of an international benchmarking exercise as low because of the lack of transparency and data quality and therefore uses a reference grid model for the incentive regulation of German TSOs ([LINK TO WEBSITE](#)).

The legislation covers far more than just network charges, much of which falls outside the primary objective of the proposal. We urge the exclusion of the following areas:

ACER and Efficiency Benchmarking

Proposals aiming to strengthen the role of the Agency for the Cooperation of Energy Regulators (ACER) in benchmarking, efficiency comparisons, and handling massive datasets should be removed. ACER Regulation provides for a clear regulatory frame how additional powers for ACER can be introduced. This does not seem to be adhered here. Benchmarking results bear the risk not to be able to attract the necessary capital for investments, which could ultimately increase TSO costs and cause considerable harm to TSOs' reputations if published. Conducting an efficiency comparison is administratively burdensome with highly questionable benefits, and since national regulatory authorities are responsible for efficiency assessments, ACER's involvement would create overlapping competencies and conflicts. Rising network costs are not primarily attributable to inefficiencies of TSOs, but rather investment needs, supply chain bottlenecks (e.g. materials and services), and lengthy approval procedures.

Smart Grid Indicators not to be used as an efficiency benchmarking tool

Smart applications are already highly advanced, and as Transmission System Operators (TSOs) continue to digitize, future efficiency gains will naturally be harder to achieve. All performance indicators must reflect this reality rather than imposing rigid, mandatory metrics (which remove national flexibility). Ideally, Smart Grid Indicators should remain voluntary and open, ensuring they are not used as a de facto instrument for comparing the performance of the European TSOs.

Transparency and Critical Data

Transparency obligations and the provision of data on critical grid situations are outside the proper scope of this legislation. Further transparency attempts should be challenged whether the data is required and beneficial and does not conflict with the need for protection and security of critical infrastructure. Also, we want to stress the need to be compliant with business security and confidentiality.

3

INCENTIVES FOR GRID-FRIENDLY BEHAVIOUR ARE REQUIRED

The requests for grid connection of storage solutions, especially batteries, for the next ten years reach the capacity of fossil-fuel generation today. This is a great development and shows, how technology and the potential for flexibility have evolved in the last years.

Business cases are mainly driven by market-based power price spreads. Our investigations of the dispatch have shown that although it might be counterintuitive, battery storage could even further exacerbate grid congestions as market-based yield potential and grid stability do fall apart. The behaviour of storage assets is optimized by algorithms incorporating various parameters, so grid conditions are no significant factor.

Therefore, we support further provisions to incentivize grid-friendly behaviour which must come with compensation for the operator. Grid tariffs as well as ancillary services should play a role here. Particularly due to the intensive trading activity of storage facilities shortly before market closure – which network operators can only accommodate in a grid-compatible manner at high, including financial, expense due to the short notice—network operators require the option of appropriate trading limitations for storage facilities close to real-time. In this context, both the economic viability of the storage facility and the operational needs of the network operators must be considered together.

4

ELECTRIFICATION AND TAXATION (ART. 18C)

Taxes and Levies

While we support incentives for further electrification via taxes and levies, such taxation-based incentivization is already possible under current frameworks. This electricity tax relief must already be notified to the EU in terms of its legal basis and amount and is published in the State Aid transparency register as aid received. This publication at EU-level should be sufficient. Therefore, no further EU-level regulation is required.

Regulatory Independence

National authorities, such as the BNetzA, are already assessing optimal network charging regimes. These authorities must remain independent from political decision-making.

5 STATE SUPPORT IS AN ADEQUATE MEASURE TO LOWER ELECTRICITY BILLS (ART. 18 (4C))

We fully support the allowance to use State funds to lower the financial burden of the energy transition for the society. The utilization of State funds to lower grid tariffs should be permitted as a measure to directly reduce electricity bills for industry and households especially as long as tariffs increase over proportionally due to massive investments in the next 5–10 years. Funds are used to reduce the reimbursement amount, lower tariffs pro rata for all grid users and thus do not distort the methodology and any incentivisation within the tariff framework.

6 LEGAL AND REGULATORY CONCERNS (ART. 61)

The introduction of a competence for the EU Commission to develop a common tariff methodology via a delegated act raises legal concerns. A delegated act has the same impact as the underlying regulation and thereby leaves little or no room for Member States and NRA competences for tariff autonomy. While the goals are commendable, the broad scope of the proposed legislation raises significant concerns from a legal and implementation perspective:

Legal Concerns over delegated acts

Utilizing delegated acts for overarching network charge guidelines is critical from a legal standpoint. It raises concerns regarding the function of a delegated act as a means of adding or amending certain non-essential rules of the relevant regulation. Further, the compliance of the proposed provision with the Electricity Regulation, the principles of subsidiarity and the European Court Rulings on the Independence of the national regulatory authorities remains doubtful.

Preserving National Flexibility

Because national grid structures vary considerably across the EU, investment needs and operational realities differ significantly. Member States require the necessary room to manoeuvre to tailor their tariff structures accordingly.

Overreach into Competencies

Binding guidelines issued by the EU Commission threaten to encroach on Member State competencies regarding national tariffs and incentives.

Introduction of additional ACER competencies

The introduction of additional tasks and responsibilities in the proposal takes place without adherence to the relevant regulatory framework of the ACER Regulation.

IMPRINT

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