



ASSESSMENT REPORT

Capacities of the Energy Regulators in the Energy Community

Energy Community Secretariat

Assessment of the Capacities of Energy Regulators in the Energy Community

Reporting released:
September 2025

Executive Summary

This report provides information about capacity-building needs of the National Regulatory Authorities (NRAs) of the Energy Community (EnC) Contracting Parties (CPs). It draws on consolidated inputs from survey among EnC NRAs regarding their currently available and needed capacities in light of an increasing scope of obligations arising from the new package of Directives and Regulations integrated into the Energy Community acquis.

The report evaluates NRAs' staffing levels, training programs, expertise available and required, as well as the structural challenges to assess gaps in regulatory capacities needed to manage growing responsibilities in the key regulatory areas, such as market integration, market monitoring, compliance enforcement, and consumer protection. The Energy Community Secretariat (ECS), as well as the Energy Community Regulatory Board (ECRB), have consistently communicated the needs for building up resources and capacities of NRAs and the ECRB to ensure that they can effectively fulfil their regulatory functions in line with the EnC acquis and requirements of European Union (EU) market integration. This report aims to complement these efforts and raise broader awareness in this respect.

Key findings:

While NRAs possess broad expertise and have built solid regulatory capacities, they are now facing growing challenges due to expanding mandates, particularly in areas requiring specialized knowledge.

NRAs have developed capacities to efficiently carry out tasks related to their national markets, focusing on issues, such as consumer protection, tariff regulation, licensing, market and quality of supply monitoring, and ensuring compliance with the national legislation. Their expertise and institutional setups were, therefore, primarily designed to operate within the national context.

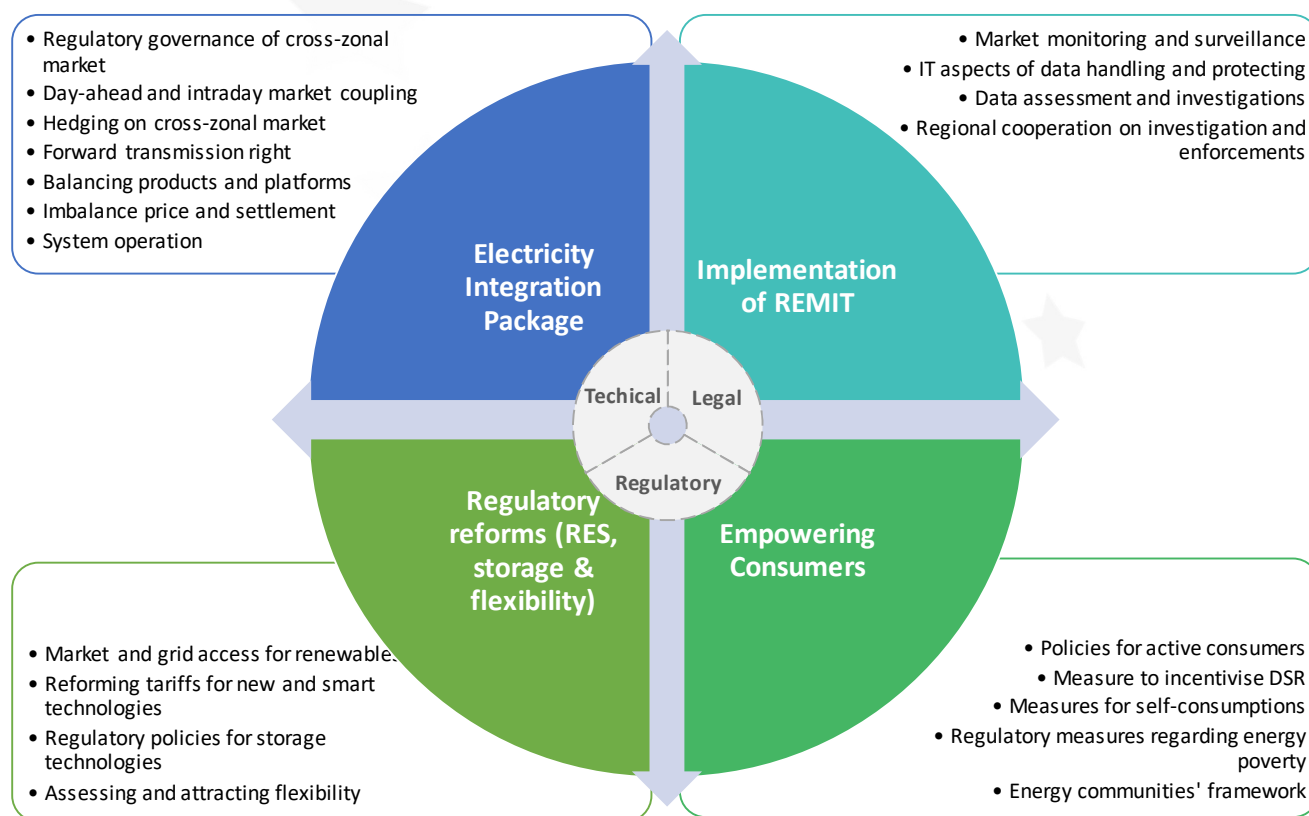
However, with the ongoing integration of energy markets, the scope of regulatory tasks has evolved and significantly expanded. An overall number of the key tasks requiring NRA engagement has almost doubled with the adoption of the Electricity Integration Package (EIP) in the EnC, with newly emerging tasks not only growing in volume, but also in complexity. NRAs are required to address challenges beyond their national borders, such as ensuring regional market efficiency, promoting cross-border trade, and fostering regional cooperation and coordination. The EIP alone foresees development, review, adoption, and enforcement of around 50 national and nearly 90 regional or pan-European terms, conditions, and methodologies (TCMs). This calls for new approaches, tools, skills sets, and collaborative frameworks that enable NRAs not only to safeguard national interests, but also to contribute to the development of an integrated, well-functioning regional market.

The key priority areas of NRAs are directly linked with the activity resulting from the new acquis, as follows:

1. Electricity market integration
2. Implementation of REMIT
3. Regulatory reforms regarding renewables, storage and flexibility
4. Empowering consumers

NRA capacities, though adequate for traditional tasks, are increasingly stretched due to new and complex regulatory obligations. The needed expertise of legal, regulatory and technical nature in the key priority areas is presented in the graph below. This graph demonstrates where NRAs need new staff and expertise to address task arising from the new EnC acquis.

Chart 1: Visual representation of the key priority areas of ECRB



With regards to ongoing activities of NRAs, the feedback from NRAs demonstrates that the existing resources (staff, expertise, budget, etc.) are entirely attributed to existing activities of the NRAs, such as: licensing, registration, tariff review, consumers protection, compliance monitoring, market monitoring, guidance, etc.

Some of the NRAs also cover other sectors beyond energy, such as water, sewage, or oil. When comparing staff engagement in different activities in this document, we only consider NRA staff working in the energy sector, including the corresponding share of staff from administration, support and management engaged in energy-related activity. On average across all NRAs, about 34% of the total number of NRA staff is engaged in energy sector regulatory activities, though this share varies by individual NRAs and their scope of sectoral responsibilities.

Feedback from NRAs indicates that, on average, when only energy-related activities are considered:

- 31% of NRA staff are engaged in electricity activities, such as: licensing, tariff reviews, compliance monitoring, regional aspects.
- 18% of NRA staff are engaged in gas activities (this includes only NRAs that cover gas markets).
- 8% are engaged in REMIT-related activities.
- 12 % are engaged in the sustainability agenda.
- 3% are engaged in the work of ECRB.

These findings demonstrate allocation of existing NRA capacities and expertise that, as per NRA feedbacks, are sufficient for dealing with traditional ongoing regulatory tasks, mainly of the national nature. However, these capacities are strained when taking into account the additional new tasks and mandates of NRAs arising from the recently adopted EnC energy acquis.

A comprehensive program of support is required to respond to these challenges. It should combine more resources for staffing and training, provision of targeted technical assistance and specialized expertise, and structured capacity-building measures, such as workshops, secondments, and knowledge exchange with peer institutions. Strengthening NRA participation in ECRB structures is equally important to reinforce regional cooperation and alignment across the Energy Community.

Ultimately, reinforcing the ECRB itself is critical to ensuring effective regulatory harmonization and a coordinated approach to market integration and integrity. This is also essential for achieving an efficient, transparent, and integrated energy market with the EU.

1. Background

NRAs play essential role in ensuring stable functioning of integrated energy market. In this context, the ECRB is crucial in facilitating coordination, and where needed, deciding or consolidating views of NRAs on acts that have regional outreach. The growing regulatory obligations under EIP, REMIT and sustainability legislation have outpaced the ability of NRAs to respond effectively with the limited resources they possess. The budgetary and staffing constraints limit the ability to expand functions in line with evolving regulatory demands.

ECS advocates for well-designed technical assistance and capacity building programs, twinning initiatives with more advanced EU NRAs, targeted secondments, etc. to enhance regulatory knowledge transfer. These recommendations align with the need for institutional stability and capacity expansion. Additionally, the ECRB plays a key role in bridging the gap between NRAs and EU regulatory bodies and the Agency for Cooperation of Energy Regulators (ACER), ensuring that best practices are adopted and that regulatory frameworks remain aligned with evolving EU energy policies.

ECS undertook a comprehensive survey of CP NRAs with the aim to get insights into staffing, financial resources, training programs, priorities and potential gaps in resources and expertise. Information provided are summarised and presented in a comparable manner. All Contracting Parties' NRAs participated in the survey.

Contracting Party (CP)	National Regulatory Authority (NRA)	Webpage
Albania (AL)	Energy Regulatory Authority (ERE)	https://ere.gov.al/
Bosnia and Herzegovina (BA)	State Electricity Regulatory Commission (SERC)	https://www.derk.ba/
Georgia (GE)	Georgian National Energy Water Supply Regulatory Commission (GNERC)	https://gnerc.org/
Kosovo* ¹ (XK)	Energy Regulatory Office (ERO)	https://www.ero-ks.org/
Moldova (MD)	The National Agency for Energy Regulation (ANRE)	https://www.anre.md/
Montenegro (MN)	Energy and Water Regulatory Agency (REGAGEN)	https://regagen.co.me/
North Macedonia (MK)	Energy Regulatory Commission (ERC)	https://www.erc.org.mk/
Serbia (RS)	Energy Agency of the Republic of Serbia (AERS)	https://www.aers.rs/
Ukraine (UA)	National Energy and Utilities Regulatory Commission (NEURC)	https://www.nerc.gov.ua/

¹ Throughout this document the symbol * refers to the following statement: This designation is without prejudice to positions on status, and is in line with UNSCR 1244/1999 and the ICJ Advisory Opinion on the Kosovo declaration of independence.

2. Evolution of regulatory tasks

Since the signature of the Energy Community Treaty, the EU and the EnC acquis has continuously expanded in scope and ambition. The early packages primarily focused on liberalising national markets, unbundling vertically integrated utilities, and establishing independent national regulatory authorities to oversee tariffs, licensing, consumer protection, and compliance with national rules. At this stage, NRAs developed solid capacities to manage national-level issues, acting as guarantors of fair competition, consumer rights, and network regulation within their domestic markets.

With subsequent legislative packages and the progressive integration of Energy Community and European energy markets, regulatory requirements have steadily moved beyond purely national concerns. The Second and Third Packages, together with the EIP, gradually introduced obligations related to cross-border trade, market coupling, regional coordination, and enhanced transparency and monitoring. This evolution has shifted the role of NRAs from regulators of domestic systems towards facilitators of regional market efficiency and integration.

Today, NRAs are tasked not only with safeguarding and balancing interests of the national energy stakeholders, but also with contributing to the governance of integrated markets, implementing REMIT, and ensuring market integrity and consumer empowerment in a regional context. This requires new technical and regulatory tools, enhanced cooperation frameworks, and sustained capacity-building to complement their traditional expertise in national market oversight.

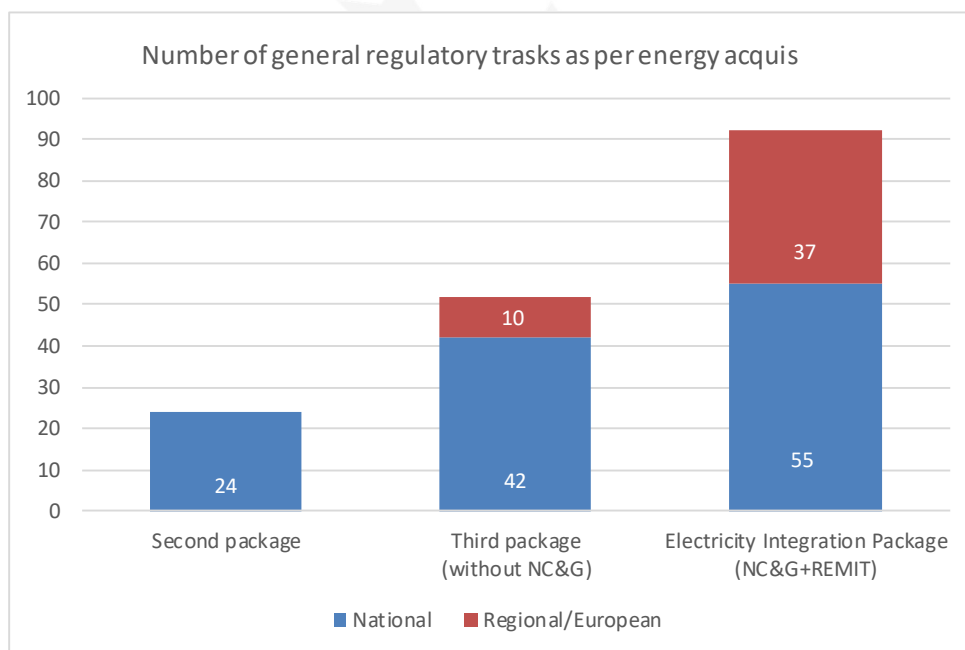
Looking ahead, the regulatory landscape will continue to evolve with the introduction of the new electricity market design in Europe, further improvement of the network codes and guidelines, and the acceleration of the energy transition. NRAs will need to expand their mandates to oversee emerging areas, such as hydrogen networks, accelerate integration of renewables, flexibility markets, demand response, consumers' empowerment, and the integration of smart technologies. This shift will require them to combine their established national competencies with forward-looking expertise in innovation, digitalisation, and decarbonisation, ensuring that regulation keeps pace with the transformation of Europe's energy system.

The gradual expansion of the energy acquis has been mirrored by a steady growth in the number and complexity of tasks assigned to NRAs. What began with relatively limited responsibilities over tariffs, licensing, and consumer protection has progressively evolved into a broad mandate encompassing cross-border cooperation, regional governance, market integrity, and new consumer rights. Each legislative package has added new layers of obligations, requiring NRAs to adapt their institutional structures, expertise, and resources.

To illustrate this evolution more clearly, the following tables quantify the increase in NRA responsibilities across successive packages of the acquis, highlighting the shift from

predominantly national tasks towards a growing share of regional and European-level obligations.

Chart 2: Evolution in the number of regulatory tasks (legal requirements of NRAs and ECRB) on cross-border issues



The chart above illustrates an estimated number of the key tasks which NRAs and ECRB are required to fulfil according to EnC acquis, formulated in provisions such as ‘the role or mandate of NRAs or ECRB’ or ‘NRAs/ECRB shall or should’, etc. With the introduction of the EIP, the number of national regulatory tasks more than doubled, while at the same time significant and more complex cross-border responsibilities emerged.

For example, the obligation for NRAs or the ECRB to review a large number of regional terms, conditions, or methodologies (TCMs) is counted as a single task in the chart above. In practice, however, such obligations are much broader in scope and resource intensive. The EIP alone foresees around 50 national TCMs and nearly 90 regional or pan-European TCMs. Their development, review, adoption, and enforcement represent a substantial workload for NRAs and the ECRB². Moreover, depending on the regional configuration, several NRAs will be required to intensify their engagement across multiple regional initiatives simultaneously.

² ACER being responsible for adoption of pan-European TCMs and for TCMs involving EU Member States, with NRAs and ECRB providing views and opinions, as relevant, to ACER.

3. Organisational aspects

Feedback collected from NRAs illustrates widespread capacity constraints. A general input is summarised in the charts below.

a. Sectors covered by NRAs in the EnC

All NRAs have competences for electricity and gas sectors. The only exception is SERC (BA). In Bosnia and Herzegovina, the legal framework has not equipped the state regulatory authority SERC with competences over gas sector.

NRAs remit per sector	Electricity	Gas	District Heating	Oil/Diesel	Water	Waste / Sewerage	Other
ERE (AL)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>					
SERC (BA)	<input checked="" type="checkbox"/>						
GNER (GE)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>			<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>
ERO (XK)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>				
REGAGEN (ME)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>			<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
ANRE (MD)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
ERC (MK)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
AERS (RS)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>					
NEURC (UA)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

Most of the NRAs cover also other sectors, such as heat, oil, and water, waste and irrigation. This is reflected in the number of employees. NEURC (UA) has regional offices and in the case of ANRE (MD) it also includes the energy inspectorate activity, which is not typical for energy regulators. Both NRAs have a considerable number of staff (due to regional offices within the respective country).

b. Staffing of the NRAs

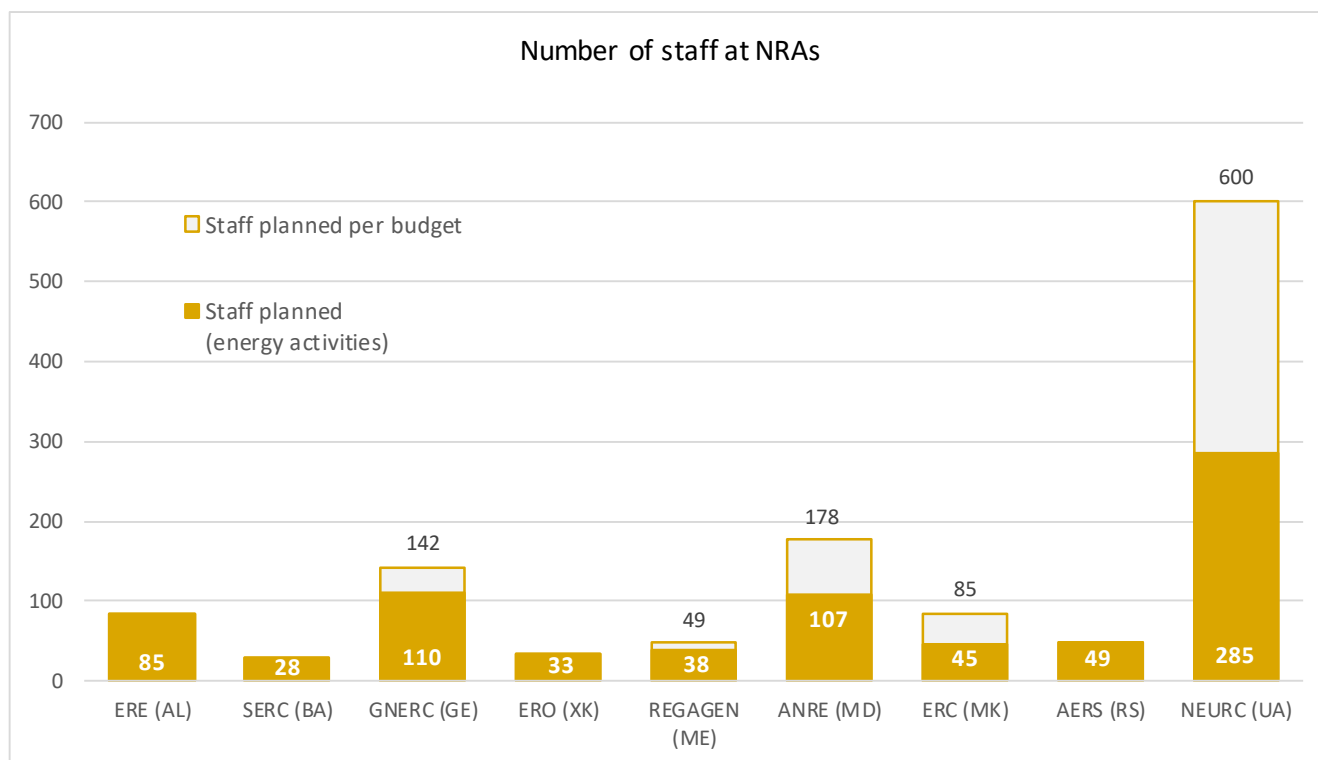
The majority of NRAs operate with a staff deficit and lack of the needed expertise in the regional market. Such expertise is crucial for establishing the regulatory framework for market integration and the respective oversight. As emphasised above, some of the NRAs cover other sectors as well, therefore further analyses are required to compare the number of employees that are involved in the electricity and gas sector.

The chart below provides the details of number of staff dividing them in three categories:

- (1) Staff planned per budget – shows the number of staff employed covering all activities of the NRAs, including other sectors (water, waste, oil, etc.)
- (2) Staff planned (only energy activities) – provides the corresponding number of staff covering electricity and gas activity. For NRAs that do not cover other sectors, this number matches the total number of staff (1). For NRAs that cover other sectors, this

represents an assumption of the number of staff engaged in electricity and gas activities.

Chart 3: Total number of staff for each NRA



The majority of NRAs operate with limited capacities and expertise in particular regarding regional market activities. This aspect is crucial for establishing the regulatory framework for market integration and the respective oversight.

All NRAs declared that with the transposition of EIP, plans for integration of full REMIT and the decarbonisation agenda, will urgently need to increase the number of staff, and enhance the inhouse expertise. For some of the NRAs this continues to be a challenge due to their salary levels compared to industry.

In ERO (XK), REGAGEN (ME), ANRE (MD) and NEURC (UA) the remuneration levels are generally lower than the industry, between 20%-50% lower, particularly at the senior and management levels. ERE (AL), SERC (BA), GNERC (GE) and ERC (MK) have competitive remuneration levels compared to industry, nevertheless this is not the case for the management level.

Most of the NRAs expressed concerns that the remuneration levels in the industry is increasing at much higher pace, therefore this could potentially be an issue also for NRAs that currently have a competitive level of salaries.

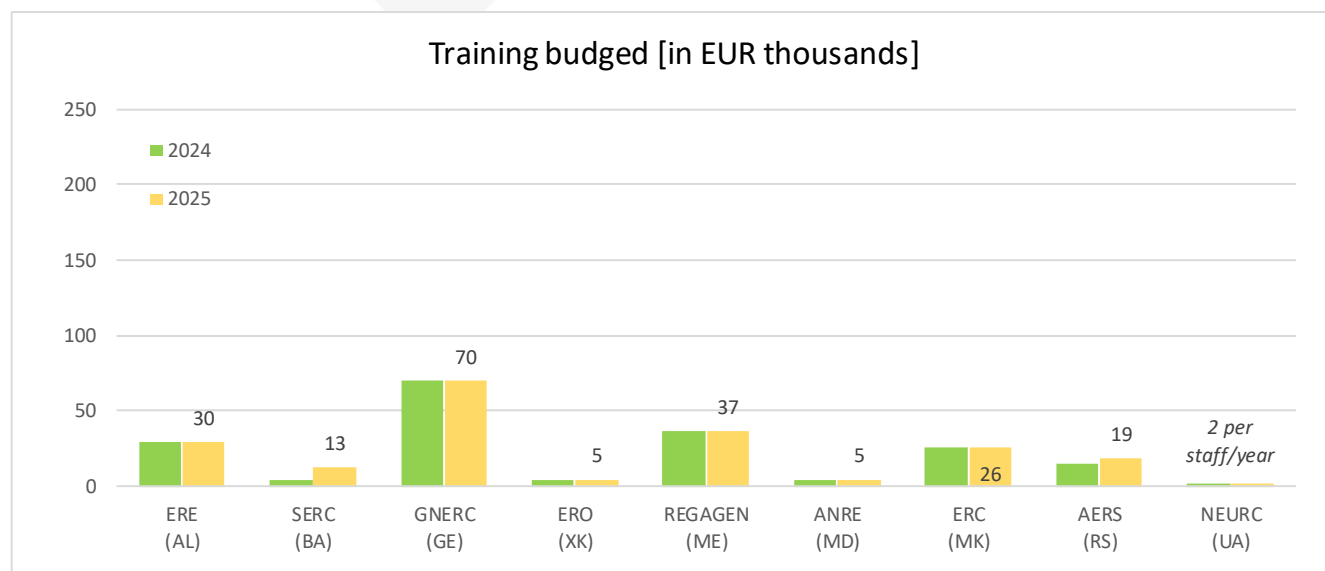
NRAs noted that due to budgetary limitations they are frequently prevented from hiring the needed staff, increase remuneration level, or develop a structured training programs that ensure continuous enhancement of capacities.

c. Training and development

Training budgets are often inadequate or non-existent. This, together with the lack of structural training programs, result in a lack of expertise and focus on the latest market and regulatory developments.

ERC (MK) has the higher training budget reaching up to EUR 240 thousand, while training budget at NEURC (UA) is EUR 2 thousand, allocated per employee/year subject to approval and limited only for specific activity, expertise, or training (noted in the chart below**). SERC (BA), ERO (XK) and ANRE (MD) have a very low budget allocation per year, around EUR 5-13 thousand, while the other NRAs the budget for staff training is around EUR 15-70 thousand per year. This often includes participation in professional conferences and workshops. The data provided by NRAs reflect the budget allocation for 2024 and 2025.

Chart 4: Training budget of NRAs



Some of the NRAs, such as ERE (AL), SERC (BA), REGAGEN (ME), and ERC (MK) are members of the Balkan Energy School, where a series of workshops on market integration are organised. Subject to the budget, and other internal conditionality the NRA staff may participate on trainings and workshops organised by ACER, ERRA, CEER, Florence School of Regulation, MEDREG, etc. Participation in the ECRB working groups and ECS events and coordination groups is considered part of NRAs engagements to enhance capacity and contribute to regional coordination.

Some NRAs reported that on periodic basis they directly or indirectly benefit from technical assistance programs provided by donors (USAID, EBRD, WB, KfW, GIZ, EC, ADF, etc.) to their respective country or organisation. In Kosovo*, Moldova and Ukraine, USAID financed assistance programs that amongst others also focused on enhancing capacities of the NRAs. USAID provided support to regional projects for market coupling between Greece-Albania-North Macedonia-Kosovo, as well as between Ukraine-Moldova and their neighbouring Member States. As of March 2025, the continuation of such support from USAID or US Government is not clear.

NRAs emphasised the areas where they lack capacity. The areas below reflect the response from most of the NRAs on general basis:

- Regulatory governance of all cross-border mechanisms,
- Market monitoring and surveillance to ensure integrity,
- Improving the regulatory framework for renewable, storage and flexibility,
- Consumers empowerment.
- Gas market development.

In the areas where NRAs do not have expertise or the adequate infrastructure, the donor support through technical assistance remains crucial. Such support is essential in ensuring that in-house expertise maintained and advanced on continuous basis.

d. Budget for IT development

In performing their duty related to data and information handling and monitoring and surveillance, the NRAs need the sensitive market and contractual data. Exchanging the data among NRAs and industry is important to efficiently monitor the market and penalise abusive behaviour in the market.

IT budget of NRAs is rather for basic business-as-usual software and hardware needs. In other words, basic computers, and software such as MS Office and similar. Most of the NRA's budget for IT is around EUR 50-125 thousand. Exception is AERS (RS), where the budget for 2025 is EUR 325 thousand. In addition, AERS is updating the IT infrastructure though an EU grant amounted to EUR 1 million.

This is an area where NRAs would need specific technical assistance in developing regulatory IT platforms combined with capacity building programs to maintain them.

4. Priority areas

All NRAs noted that the regional cooperation is crucial for efficient market integration and coordination of NRAs across EU and EnC. Market integration remains high in the agenda of NRAs, followed by implementation of REMIT, and regulatory reform to advance integration of renewables and storage infrastructure. Consumer empowerment remains an important priority among NRAs followed by tariff reforms and gas market development.

The chart below outlines the key priority areas of NRAs. The number/share in the chart shows the number of NRAs account such area of work as priority area. For example, market integration is prominently mentioned by 8 NRAs as a priority.

Chart 5: Key priority areas of NRAs



This section provides general overview of NRA priorities. In terms of specific areas of work, the following activities related to market integration and regulatory development are currently at the forefront:

- Market integration:** A key priority is establishing robust governance structures and completing the framework for day-ahead market coupling. This includes, but is not limited to, operationalising coordinating regions, implementing processes for the coordinated capacity calculation, fulfilling preconditions for market coupling, and

ensuring the application of pan-European terms, conditions, and methodologies. Looking ahead, intraday market coupling and balancing market integration, along with their associated governance, remain high on the agenda.

- **REMIT:** NRAs are focused on establishing market surveillance systems and effective monitoring procedures. Equally important is ensuring timely access to data and information necessary for conducting assessments and investigations, including coordination at the regional level. In parallel with market integration efforts, NRAs must also prepare for the impacts and full implementation of the revised EU REMIT framework.
- **Regulatory reforms:** There is a growing need to define regulatory measures that guarantee market and grid access for renewable energy, storage, and flexible technologies. Additionally, frameworks must include clear incentives to attract investments in these areas, which are essential as Contracting Parties progress toward their decarbonisation goals.
- **Empowering consumers:** NRAs must continue to develop regulatory frameworks that guarantee consumer choice and enable active participation in energy markets. This includes promoting models such as energy communities, active consumers, demand-side response mechanisms, etc.
- **Tariff reforms:** Redefining tariff methodologies is critical to ensure they reflect actual grid costs while promoting efficiency and innovation. Reforms should include incentive mechanisms that support clean and smart technologies, facilitate grid digitalisation, and encourage energy savings, while preserving a level playing field.
- **Gas market development:** Establishing a regulatory framework for gas market integration and cross-border exchanges remains a priority. As the market evolves, NRAs also recognise the need to build their capacity for the future regulation of hydrogen technologies.

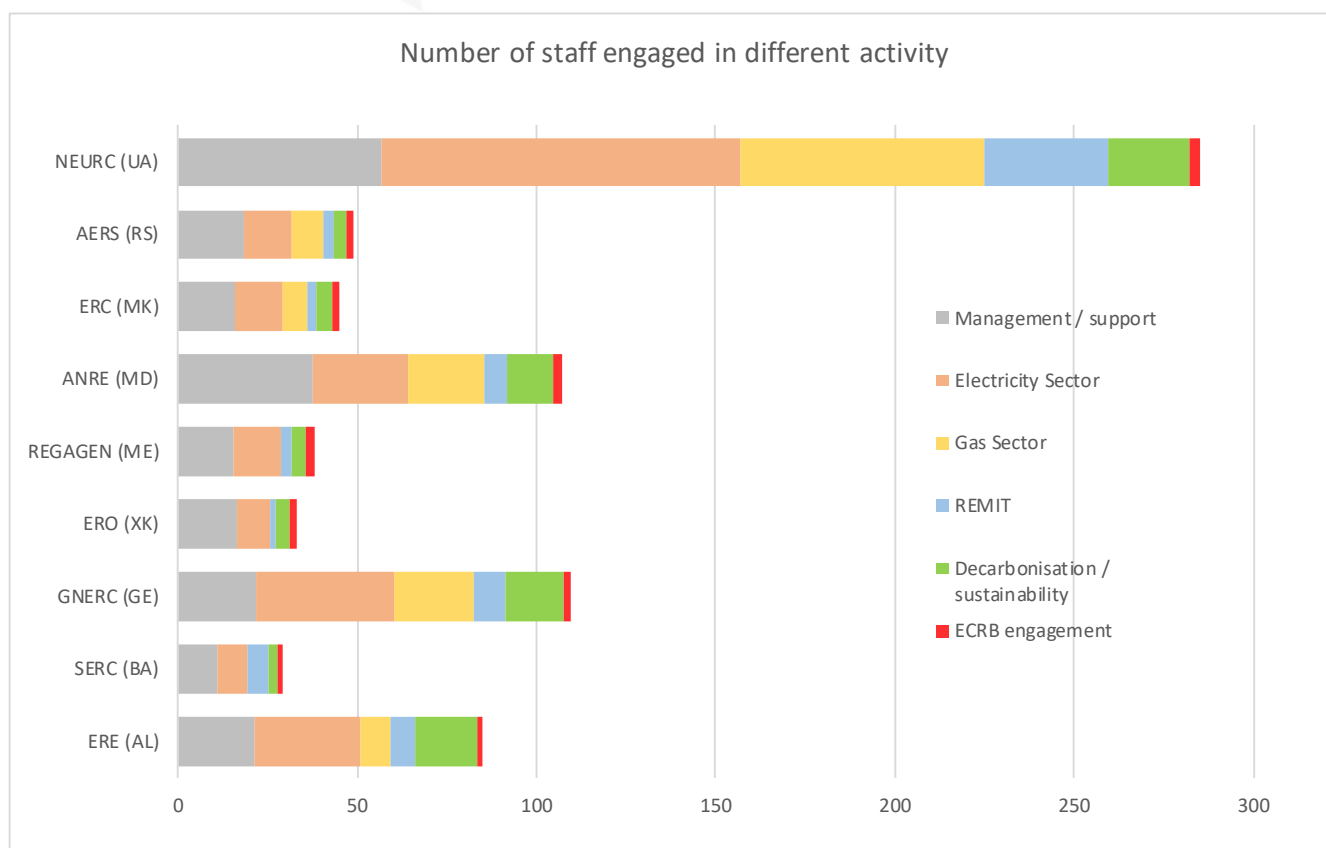
These priorities reflect only a portion of NRAs' broader focus areas. Alongside these strategic and priority areas, NRAs continue to perform their core regulatory duties, underscoring the increasing demand for expertise and resources.

5. Engagement of staff per sector/activity

Recognising the priorities, where the focus is regional integration and coordination, the NRAs' responses show strong allocation of resources to national activity, such as licensing, cost and tariff assessment, monitoring, consumer protection, etc. This is normal considering that these are their key activity in line with respective national legal and regulatory framework.

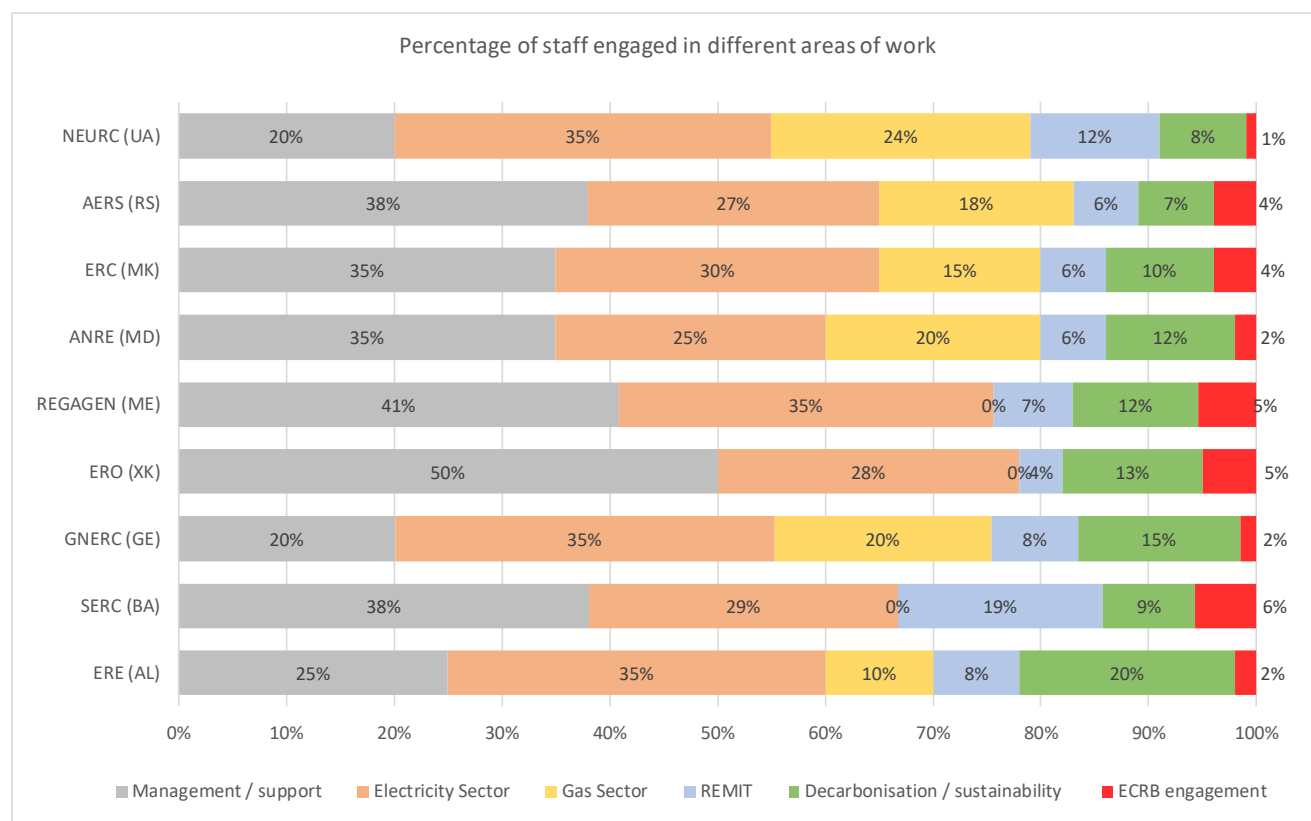
The chart below outlines engagement of the NRAs' staff per different areas of work, without considering the sectors which are not regulated by the EnC acquis.

Chart 6: Number of staff of each NRA per area of work



The number of staff depends on the size of the energy market, therefore NEURC (UA) has a significant number of staff engaged in energy-related activity compared to other NRAs. Staff engaged in administration and support, including also management (board members), is relatively high on smaller markets. Percentage of staff engaged shows similar spread of staff across different activities.

Chart 7: Percentage of staff of each NRA per sector/activity



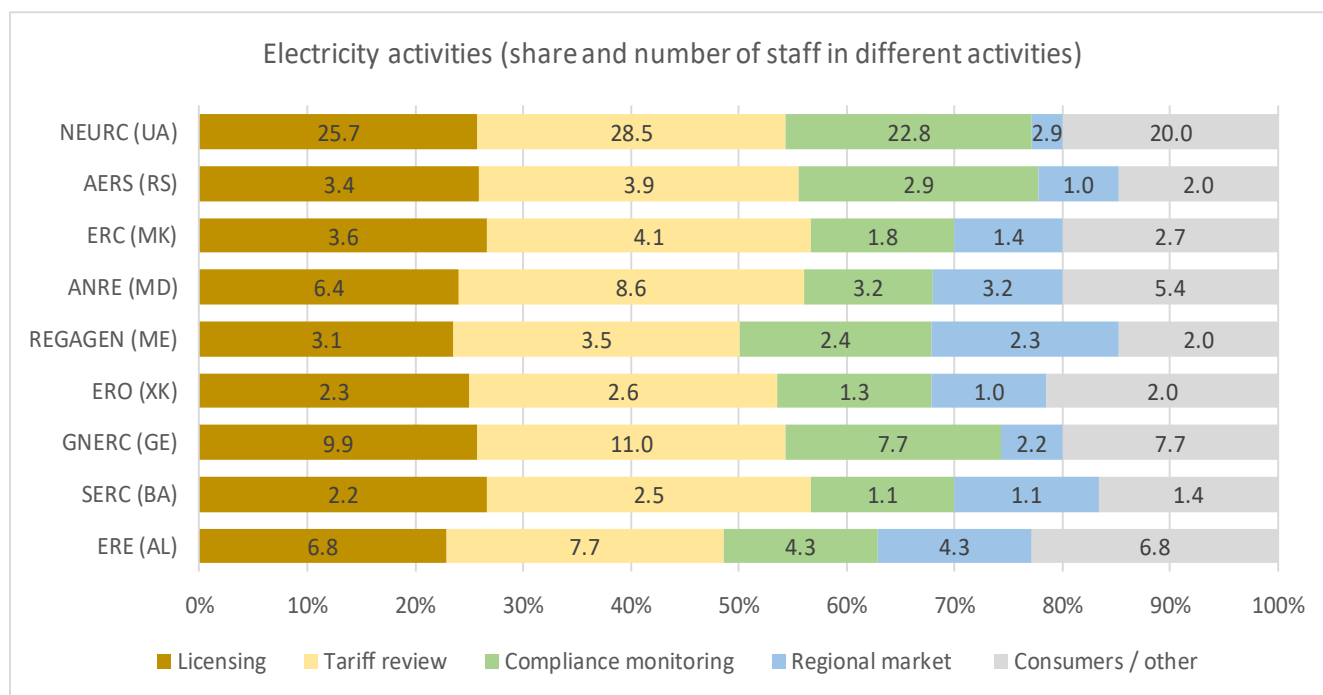
a. Electricity related activity

NRAs provided information and assumption on number of staff in different activities within the electricity sector. The chart below provides the number and percentage of staff engaged in different electricity activity, grouped in the following categories:

- Licensing – involves activities around licensing, authorisation, registration, designation, etc.
- Tariff review – involves activities around cost assessment and monitoring, as well as tariff reviews, which includes transmission, distribution, and where applicable universal supply tariffs.
- Compliance monitoring – involves monitoring of the performance or regulated companies, quality of services, general monitoring of the market mechanisms in place, etc.
- Regional market – involves activities related to regional market and exchanges, including activities around market coupling, cross-border capacity calculation and allocation, cross-border balancing, etc.

→ Consumers – involves activities related to protection of consumers, dealing with consumers and industry complaints, etc.

Chart 8: Number and share of staff dedicated to different activity in electricity



While there are significant cross-border exchanges, and the electricity markets are expected to be integrated in the pan-European mechanisms, the share of NRAs’ staff engaged in regional market activities seem rather small. On average NRAs have 2 full time persons engaged on understanding, reviewing and developing regulatory framework related to regional market. In ERE (AL) this number seem higher, potentially reflecting the intense activity in the last few years regarding market coupling Albania-Kosovo.

In delivering market integration in an efficient manner, NRAs should engage more experts on regional market activities considering an intense governance role that NRAs have in relation to EIP.

NRAs emphasised the fact that due to limited resources, they need support and enhanced expertise in electricity sector, in the following areas:

- Regional market integration and regulatory governance
- Day-ahead and intraday market coupling,
- Cross-border balancing
- Cross-border capacity calculation
- Delineation of the bidding zones and addressing structural congestion

- Monitoring 70% requirement,
- Forward market design, including the forthcoming aspects related to virtual trading hubs.

b. Gas related activity

In a similar manner as for electricity, NRAs provided information and assumption on number of staff in different activities within the gas sector. The chart below provides the number and percentage of staff engaged in different gas activity, grouped in the following categories:

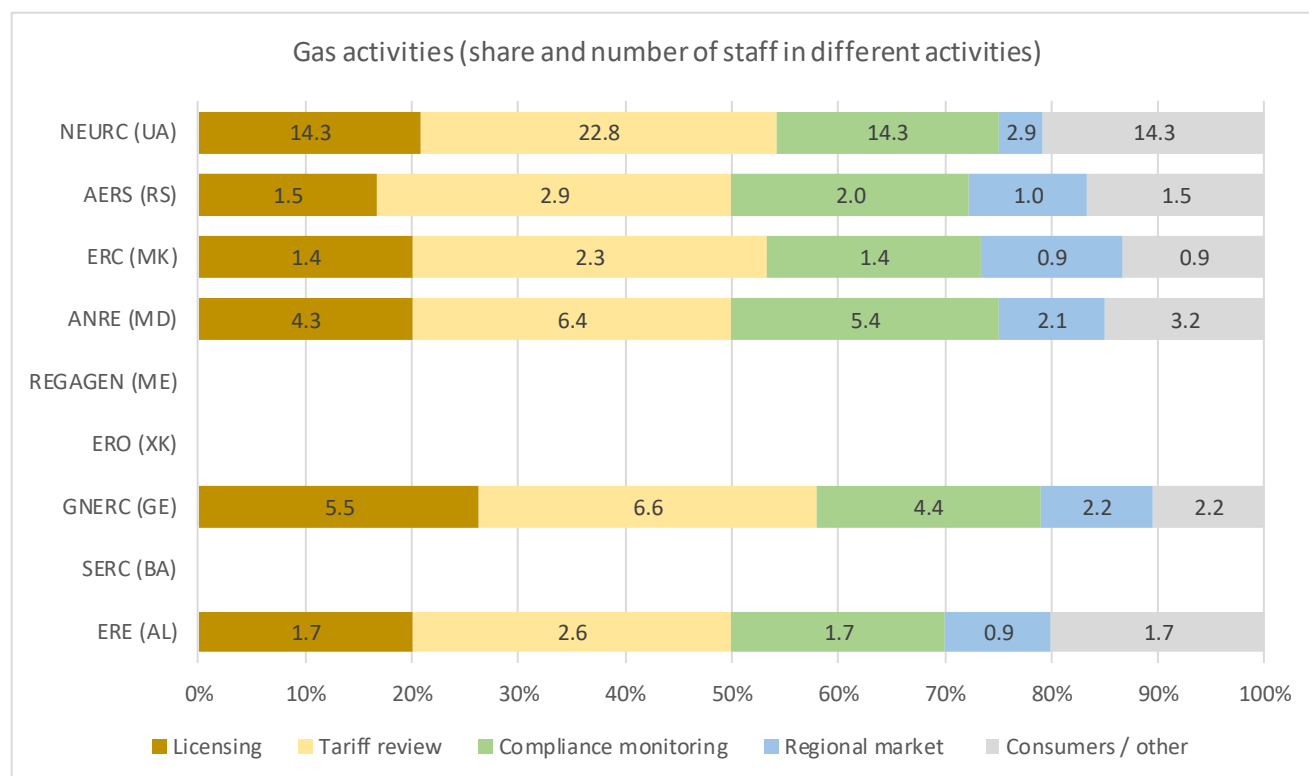
- Licensing – involves activities around licensing, authorisation, registration, etc.
- Tariff review – involves activities around cost assessment and monitoring, as well as tariff reviews, which includes transmission, distribution, and where applicable regulated tariffs.
- Compliance monitoring – involves monitoring of the performance or regulated companies, quality of services, general monitoring of the market mechanisms in place, etc.
- Regional market – involves activities related to regional market and exchanges, including activities around cross-border capacity calculation and allocation, etc.
- Consumers – involves activities related to protection of consumers, dealing with consumers and industry complaints, etc.

NRAs from CPs that do not have gas market or gas network (ERO and REGAGEN), despite having competences for gas market, have negligible engagement in gas regulatory activity. SERC (BA) does not have competences for gas sector, hence no staff dedicated to it.

Some of the NRAs have emphasised the importance to enhance capacities in the gas sector, in the following areas:

- Regional market and cross-border exchanges,
- System operation,
- Cost assessment and tariff setting,
- Market monitoring,
- Hydrogen regulatory framework.

Chart 9: Number and share of staff dedicated to different activity in gas

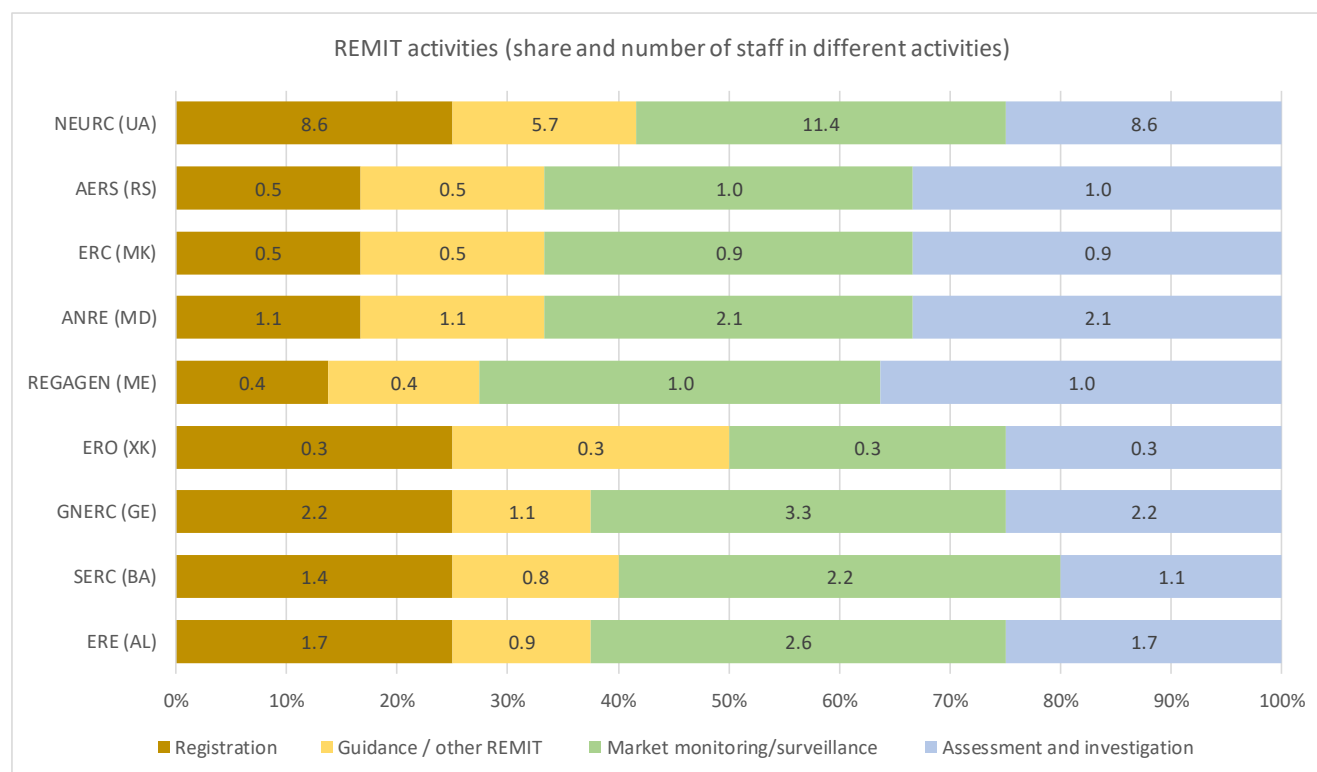


c. REMIT related activity

NRAs also provided information and assumption on number of staff in different activities related to REMIT. The chart below provides the number and percentage of staff engaged in different REMIT activity, grouped in the following categories:

- Registration – involves activities around registration of market participants and national registrar, etc.
- Guidance – involves communication with stakeholders, developing and providing guidance, explanations, etc.
- Market monitoring/surveillance – involves monitoring and surveillance, including data handling for such purpose, etc.
- Assessment and investigation – involves activity around assessment of suspicious activity and undertaking investigations, decisions, etc.

Chart 8: Number and share of staff dedicated to different activity in REMIT



The share of staff involved in different REMIT related activity shows a similar spread across different market, relative to the size of the market. Most of the NRAs have a very small team dealing with REMIT-related activity. NEURC (UA) put a significant stress to market surveillance and data reporting given the size of the market. This is visible also from the number of staff engaged in REMIT related activity.

All NRAs have emphasised the need for technical assistance and enhanced capacities regarding REMIT implementation, in particular in the following areas:

- Legal and investigatory expertise,
- Market surveillance and monitoring,
- Data assessment and handling (including IT platforms),
- Cybersecurity and data protection.

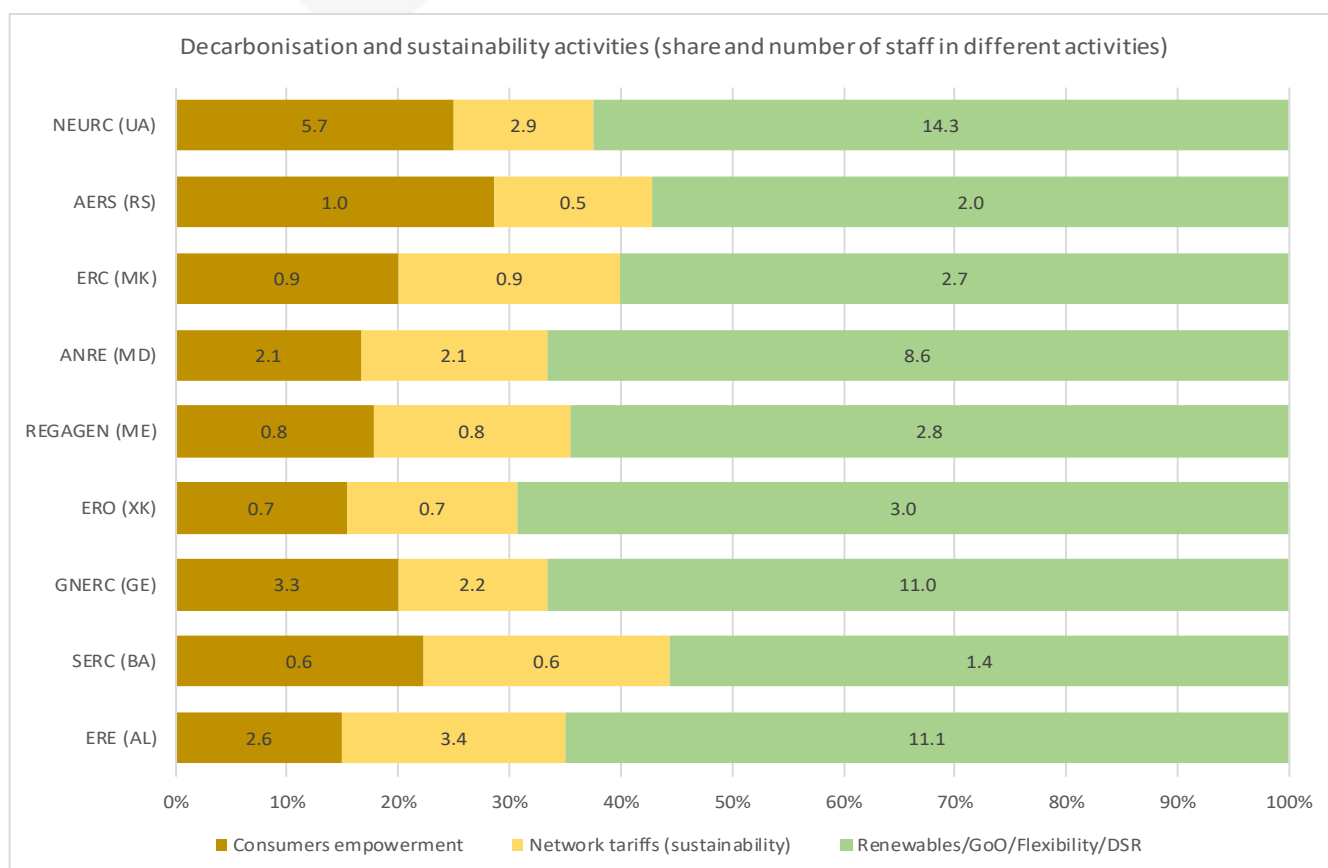
d. Decarbonisation and sustainability activity

NRAs provided information and assumption on number of staff in different activities related to decarbonisation and sustainability.

The chart below provides the number and percentage of staff engaged in different decarbonisation and sustainability activity, grouped in the following categories:

- Consumer empowerment – involves activities related to self-generation, energy community, active consumers, aggregation, dynamic and fixed prices, etc.
- Network tariffs – involves activities to reform network tariffs to incentivise renewables, storages, flexibility infrastructure, demand-side response, etc.
- Renewable/flexibility – involves activities related to permits for renewable and storage, connections, framework for incentivising flexibility, etc.
- DSR/GoO – involves activities related to demand-side response, Guarantees of Origin or similar incentive mechanism, including activities related to CO2, etc.

Chart 10: Number and share of staff dedicated to different activity in sustainability and decarbonisation



NRAs need to enhance capacities in the area of sustainability. A big part of EIP and the forthcoming acquis is about consumer empowerment, renewables, flexibility, etc., hence it is to be expected that more staff will be needed.

NRAs have emphasised the need to enhance expertise in the sustainability and decarbonisation agenda, in the areas:

- Enhancing regulatory framework to incentivise:
 - renewables and respective balancing,
 - Storage and Flexibility.
- Consumers empowerment, amongst others, through:
 - Incentive network tariffs,
 - Self-consumption,
 - Use of flexibility,
 - Supply tariffs (offering fixed and dynamic prices), etc.

e. Engagement of NRAs in ECRB and other international activities

EnC NRAs are members of ECRB and are actively engaged in ECRB and its substructures (working groups and task forces). All deliverables and activities stemming from ECRB Work Program are products of active engagement of experts from NRAs. The engagement extends not only through participation in the ECRB and its substructures' meetings and events, but also in work associated with providing information, preparing and reviewing reports, adopting decisions, ad-hoc calls, etc.

The report highlights that regional cooperation within the ECRB framework remains a priority, with NRAs acknowledging the need for stronger collaboration in cross-border mechanisms, market coupling, market monitoring, and the regulatory frameworks for renewable energy, storage, and flexibility. However, engagement in regional market activities is currently limited due to resource constraints. Similarly, the full implementation of REMIT and other energy market governance measures is hindered by gaps in legal, investigatory, and cybersecurity expertise.

The survey indicates that each NRA engages at least one full-time equivalent expert in ECRB activities. The average engagement amounts to nearly 2 full-time equivalents, considering that some NRAs contribute additional staff through working group chairpersons, task leaders, etc. This value takes into account participation in all ECRB and its working group meetings and activities, as outlined above.

NRAs also engage with many other international institutions, such as European Commission, ECS, ACER, etc. in performing their regulatory tasks. This is complemented with cooperation among fellow regulatory institutions and associations, such as ERRA³, CEER⁴, or MEDREG⁵.

³ [Energy Regulators Regional Association](#)

⁴ [Council of European Energy Regulators](#)

⁵ [Association of Mediterranean Energy Regulators](#)

Due to limited resources, NRAs already struggle to ensure the continuous engagement of their experts in various ECRB activities. Given the increasing scope of ECRB decision making and monitoring activities under the new acquis, engagement of NRAs in ECRB activities is going to increase. Tasks related to regional and European market integration will go on top of their new national tasks, as illustrated in Chart 2, further straining their capacities.

Strengthening NRA capacities through direct support and enabling the involvement of additional experts would enable for sustained and consistent participation of NRA representatives in ECRB tasks.

6. Capacity building areas

Taking into account the ongoing activities of NRAs, as well as the emerging priorities and tasks, the required additional expertise and staff capacities are needed with regards to:

- Regulatory governance arising from the EIP, such as network codes and guidelines, including the assessment, review, amendment and approval of terms, conditions, and methodologies submitted by TSOs and NEMOs within the context of market integration. This includes establishing and implementing framework for:
 - Efficient day-ahead and intraday market coupling,
 - Integration into the balancing platforms and system operation processes,
 - Integration into forward market mechanisms, hedging instruments and future forward hubs,
 - Monitoring the performance of market mechanisms, to ensure continuous improvement in the market through regulatory reforms and measures,
 - Overseeing the implementation of requirements under the network codes and guidelines,
 - Efficient cooperation and coordination with EU NRAs and ACER.
- Implementing a comprehensive market integrity and transparency regime (REMIT) consistent with the one applicable in the EU, encompassing:
 - Data reporting and handling, with the respective platform,
 - Data protection/cybersecurity
 - Surveillance and assessments,
 - Investigations, enforcement and penalties,
 - Regional cooperation among NRAs,
 - Close cooperation with ACER.
- Assuming active role in implementation of relevant dimensions under National Energy and Climate Plans (NECPs), with emphasise on internal energy markets, energy security and decarbonization dimensions, as well as consideration of the energy efficiency first principle in network planning, network development and investment decisions. In this regard, developing:
 - Regulatory framework that facilitates integration and access of renewables, storage and other flexible technologies,
 - Reforming network tariffs with incentive elements to accommodate renewables and other innovative, clean and efficient technologies,
 - Assessing network development plans, connection codes, and charging methodologies.
- Understanding and developing regulatory policies that empower consumers, protect the energy poor and vulnerable consumers. This includes:

- Regulatory framework for active consumers, self-consumption and energy communities,
- Measures to incentivise demand side response,
- Measures for suppliers to offer optional dynamic and fixed retail contracts,
- Setting indicators and monitoring quality of supply and retail market,
- Monitoring licensing requirements.

It should be emphasised that a structured program is needed to continuously strengthen the capacities of NRAs, as limited resources have so far constrained their focus on key areas. Such support should combine targeted training, enhanced regional cooperation and direct expert support that enable informed regulatory decision-making and enforcement.

7. Conclusion and Recommendations

The findings of this assessment underscore the urgent need for NRAs of the EnC to strengthen their capacities in order to effectively fulfil their regulatory functions related to governance of market integration, market integrity, regulatory reforms and consumer empowerment. As the implementation of EIP and REMIT progresses, NRAs are faced with increasing obligations that require enhanced human resources, expertise, and financial stability.

Though NRAs have traditionally built strong expertise in regulating national markets, the scope of their national regulatory tasks is expanding. This comes hand in hand with their expanded mandates, mostly under the ECRB framework, in regional oversight and cross-border cooperation to enable market integration. These new tasks require additional resources, technical tools, and capacity-building to complement their national competencies.

A key challenge identified is the widespread shortages in capacities and the lack of specialized expertise in crucial areas, such as market integration, monitoring, and compliance enforcement. Many NRAs operate with salary structures that are uncompetitive compared to industry standards, making it difficult to attract and retain talent. Additionally, constrained budgets have hindered their ability to invest in structured training programs and modern IT infrastructure, both of which are essential for effective market surveillance and regulatory enforcement.

The report also highlights that regional cooperation remains a priority, with NRAs acknowledging the need for stronger collaboration in cross-border mechanisms, market coupling, and the regulatory frameworks for renewable energy, storage, and flexibility. However, engagement in regional market activities is currently limited due to resource constraints. Similarly, the full implementation of REMIT and other energy market governance measures is hindered by gaps in legal, investigatory, and cybersecurity expertise.

To address these challenges, a holistic approach is required, which would include:

- **Adequate resourcing:** Higher budgets for staffing, training, and capacity-building to strengthen NRA expertise.
- **Capacity-building and knowledge transfer:** Structured training programs, workshops, twinning arrangements, secondments, and knowledge-sharing with other NRAs, ACER, and other relevant institutions.
- **Specialized expertise and technical assistance:** Engaging experts to support regulatory tasks, drafting key policies and decisions, and preparing studies and assessments for informed decision-making.
- **Support for regional cooperation:** Facilitating and strengthening ECRB as institution and ensuring active NRA participation in its structure to enhance regional alignment.

Finally, strengthening the ECRB is crucial to ensuring regulatory harmonization and a more coordinated approach to market integration and market integrity. ECRB as an institution has certain important tasks. Strong expertise and active engagement from NRAs is crucial to ensure efficient work of ECRB. A well-resourced and competent regulatory framework is fundamental to achieving an efficient, integrated, and transparent energy market within the Energy Community.





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