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Euroconsumers Response to the European Commission's Call for Evidence on the European Grids Package

25 July 2025

1. Introduction: The Grid as a Consumer Issue

Euroconsumers[1] and its member organisations in Spain (OCU), Italy (Altroconsumo), Belgium (Testachats/Testaankoop) and Portugal (Deco Proteste) welcome the opportunity to contribute to the European Commission's forthcoming European Grids Package.

Grids are no longer just technical infrastructure; they are critical enablers of Europe's competitiveness, decarbonisation, and energy affordability. Yet for millions of consumers, their importance only became tragically visible during the April 2025 blackout on the Iberian Peninsula. This large-scale disruption exposed serious shortcomings in grid planning, coordination, and consumer protection. This is something Euroconsumers' organisations in Spain and Portugal experienced first-hand and will feed into our response to this consultation.

The Grids Package is a crucial opportunity to address those shortcomings and to ensure that Europe's infrastructure is ready for a secure, sustainable, and consumer-centred energy future.

2. What Happened: The Iberian Blackout as a Case Study

On 28 April 2025, Spain experienced a sudden and widespread power failure around midday. Within minutes, the cascading effects of grid instability extended into Portugal, cutting off the Iberian Peninsula from the wider European network. Power was only fully restored the following morning, thanks to backup systems and support from limited cross-border interconnections.[2]

The blackout affected essential services: public transport, hospitals, emergency responders, telecommunications, and digital infrastructure were all severely disrupted. Vulnerable consumers, such as rural households, elderly residents, and people reliant on medical devices, were left particularly exposed.

According to the **Spanish government's preliminary investigation**, the failure was caused by:

- Poor planning by Red Eléctrica de España (REE), which failed to schedule adequate thermal generation to manage an overvoltage incident;
- Premature disconnection by several operators who failed to absorb required reactive power;

[1] **About Euroconsumers:** Gathering five national consumer organisations and giving voice to a total of more than 6 million people in Italy (Altroconsumo), Belgium (Testachats/Testaankoop), Spain (OCU), Portugal (DecoProteste) and Brazil (Proteste), Euroconsumers is the world's leading consumer Group in innovative information, personalised services and defence of consumer rights. Our European member organisations are part of the umbrella network of BEUC, the European Consumer Organisation. Together we advocate for EU policies that benefit consumers in their daily lives.

[2] **ENTSO-E (2025),** *28 April 2025 Iberian Blackout,* Report in progress. https://www.entsoe.eu/publications/blackout/28-april-2025-iberian-blackout/

- A system-wide collapse triggered by these compounding errors.[3]

This was not a freak event, but a preventable failure, rooted in low interconnection capacity, weak operational coordination, and insufficient real-time system flexibility. As Europe accelerates electrification and renewable integration, these vulnerabilities will only grow more acute unless addressed head-on.

3. Systemic Challenges the Package Must Address

3.1. A Grid Not Yet Ready for the Green and Digital Transitions

Europe's electricity grids are increasingly strained. In a recent opinion on Electricity National Development Plans, ACER underscored that "the transformation of the energy system towards the 2050 climate objectives" requires "a resilient and future-ready electricity grid infrastructure".[4] Electrification of heating, transport, and industry, all key to delivering Europe's industrial and green ambitions, is driving up demand, while the shift to decentralised and variable renewables is introducing more volatility into the system. These changes require grids that are:

- **Digitally enabled** (real-time monitoring, smart metering, AI-based balancing);
- **Flexible** (integrating storage, demand response, and distributed generation)[5];
- **Resilient** (able to withstand and recover from external shocks).

Yet as of 2024, **half of the EU's cross-border electricity needs for 2030 (32 of 66 GW) were still unaddressed**, with the gap expected to rise to **37 GW by 2040**.[6] This underscores a growing mismatch between climate ambition and grid readiness.

3.2 Poor Interconnection Undermines Resilience

Despite years of planning, the **Iberian Peninsula remains one of the least interconnected regions in the EU**, falling well below the 15% interconnection target. While key Projects of Common Interest (PCIs), such as the **Bay of Biscay interconnector**, are underway, they are

[3] **Ministerio para la Transición Ecológica y el Reto Demográfico (2025),** *Se presenta el informe del Comité de análisis de la red eléctrica del futuro,* https://mcusercontent.com/2702b812ce1f3e6da64933b9d/files/f543f912-b15e-d3ae-8a8a-e393bf6fdfb6/20250617_NdP_Se_presenta_el_informe_del_Comit_eacute__de_an_aacute_lisis_de_la.pdf

[4] **ACER – Agency for the Cooperation of Energy Regulators (2025)**, *Supporting EU's energy infrastructure through planning and financing: ACER calls for greater consistency in European electricity network plans, 22* July 2025. https://www.acer.europa.eu/news/acer-calls-greater-consistency-european-electricity-network-plans

[5] See also **BEUC – The European Consumer Organisation (2019)**, *Consumers and the Future Electricity Grids,* 15 October 2019. https://www.beuc.eu/sites/default/files/publications/beuc-x-2019-059_consumers_and_future_electricity_grids.pdf

[6] **ACER (2024),** *Electricity infrastructure development to support a competitive and sustainable energy system,* Monitoring Report. https://www.acer.europa.eu/sites/default/files/documents/Publications/ACER_2024_Monitoring_Electricity_Infrastructure.pdf

not yet operational, and progress has been slow.[7]

The blackout made clear that inadequate cross-border capacity increases systemic risk and limits any attempts at a European response. It also undermines affordability by restricting access to cleaner, cheaper power from neighbouring markets.

3.3 Consumers Are Still Sidelined

When grid failures occur, consumers face the consequences: outages, loss of services, economic harm, and too often, **a lack of information, accountability, or redress**. In the Iberian case, communication during the crisis was patchy, compensation unclear, and protection for vulnerable consumers minimal.

In a modern, interconnected Europe, consumers must no longer be passive recipients of infrastructure decisions. They must be seen as **active participants**, supported by transparency, rights, and digital empowerment.

4. Recommendations for the European Grids Package

The Commission's **2023 Action Plan for Grids** rightly identified the grid as the "backbone of a well-functioning energy market".[8] It called for urgent investment in modernisation, faster permitting, and stronger regional coordination — all priorities the Iberian blackout brought into sharper focus.

The Grids Package should build on and operationalise the Action Plan by:

- Making consumer-centric resilience and digitalisation measurable and enforceable;
- Strengthening alignment between national and regional grid planning;
- Enhancing transparency and public participation, particularly in projects with significant consumer and cross-border impact.

To align with the Commission's objectives, including those set out in the **TEN-E Regulation**, the **REPowerEU plan**, and the **Action Plan for Affordable Energy**, the Grids Package should address the following priorities:

4.1 Prioritise Strategic Interconnection and Grid Coordination

Why?

The blackout exposed the Iberian Peninsula's isolation due to low cross-border capacity

[7] **HVDC World (2025),** *Iberian Blackout May Drive Stronger EU Cooperation on Interconnectors,* 20 May 2025; **European Parliament (2025),** *Electricity grids: the backbone of the EU energy system*, Resolution P10_TA(2025)0136, 19 June 2025.

[8] **European Commission (2023),** *Grids, the missing link – An EU Action Plan for Grids,* COM(2023) 757 final. https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=COM%3A2023%3A757%3AFIN

(well below the EU's 15% target[9]). This structural weakness prevented swift grid support from the rest of Europe.

Recommendation:
The Grids Package should mandate accelerated implementation of priority interconnectors (e.g., Bay of Biscay, Spain-France underground interconnection), with binding deadlines, simplified permitting pathways, and dedicated EU funding. These measures should explicitly aim to reduce systemic risk and bring interconnection levels in line with the EU-wide target.

4.2 Ensure Flexibility and Smart Grids with Strong Consumer Safeguards

Why?
Smart grid infrastructure underpins demand response and distributed production which is essential for grid flexibility. This requires smart energy systems, including digital meters that really empower users, while respecting consumer privacy & security.[10] These systems are the bedrocks for more innovative energy solutions, including energy communities, something our Belgian member, Testachats, has been working on.[11]

Recommendation:
- Expand access to demand-side response and energy communities, ensuring interoperability and affordability;
- Support digitalisation of distribution grids while ensuring strong cybersecurity and data protection safeguards are in place;
- Incentivise local flexibility markets that allow households and SMEs to support grid stability.

4.3 Make Resilience and Consumer Protection Core to Grid Governance

Why?
During the blackout, millions experienced outages without adequate warning, explanation, or compensation, especially vulnerable individuals with medical or communication needs.

[9] **European Parliament and Council (2018),** *Regulation (EU) 2018/1999 on the Governance of the Energy Union and Climate Action*, Official Journal of the European Union, L 328, 21 December 2018. https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32018R1999

[10] **Test Aankoop (2024),** Zonnepanelen en de digitale meter, 4 June 2024. https://www.test-aankoop.be/woning-energie/gas-elektriciteit-mazout-pellets/dossier/digitale-meters/zonnepanelen-en-digitale-meter

[11] **Euroconsumers (2024),** *Chilling energy prices: how are EU consumers faring this winter?*, 19 January 2024. https://www.euroconsumers.org/chilling-energy-prices-how-are-eu-consumers-faring-this-winter/; **Test Aankoop (2024)**, *Welke kosten rekenen energieleveranciers aan voor energiedelen? – Wat is energiedelen*, published September 2024. https://www.test-aankoop.be/woning-energie/hernieuwbare-energie/nieuws/leveranciers-maken-energiedelen-onnodig-duur#wat-is-energiedelen

Recommendation:

- Establish minimum EU-wide standards for outage communication, compensation, and continuity of essential services;

5. Conclusion: Building a Resilient, Connected, Consumer-Centric Europe

The Iberian blackout was a warning that must not go unnoticed. It illustrated what happens when infrastructure, planning, and consumer needs are not aligned. The upcoming Grids Package must respond with urgency and vision, building a system that works not just for markets or Member States, but for the people who depend on it every day.

Consumers must no longer be an afterthought in energy infrastructure planning. They must be at the centre of Europe's resilience and energy transition strategies.

Euroconsumers remains committed to supporting this work and will publish a detailed position paper ahead of the Commission's legislative proposal.