



ENERGY SECURITY BULLETIN

PILOT ISSUE



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DiXi Group is the Kyiv-based think tank founded in 2008 and involved in research and consultations in the energy sphere, on the crossroads of politics, public relations, security and investments.

Esperis Consulting - Warsaw-based consultancy firm active in energy market.

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Editor's corner

With this bulletin DiXi Group is introducing a review of selected issues related to the energy security of Ukraine and the region. The article by our partner ESPERIS provides a study into shaping new realities of the European gas market, namely the role of LNG and Russian strategy in this regard in the Baltic Sea area.

Another striking evidence of Kremlin's energy policy in this region is the infamous Nord Stream 2 project. As it is being contained by the U.S. sanctions, one of possible backdoors is a 'climate foundation' established by the German state of Mecklenburg-Vorpommern with support of the project operating company. Of solidarity with true German 'green' movement, we want to raise again the environmental treats and damage from the pipeline's construction – see the dedicated material.

DiXi Group experts have also compiled a review of legislative initiatives in Ukraine, which have been debated in 2020. Of particular interest are those related to general framework of energy security management, but also related to nuclear safety and electricity storage systems. Last but not least, last year became the time of COVID-19 challenge, putting energy facilities and markets at risk. With review of a policy paper by the Florence School of Regulation, we would like to indicate the variety of emergency response measures introduced by different governments of the world.

With this pilot, rather experimental issue of the bulletin, we hope you will enjoy the reading!

Roman Nitsovych, Research Director, DiXi Group

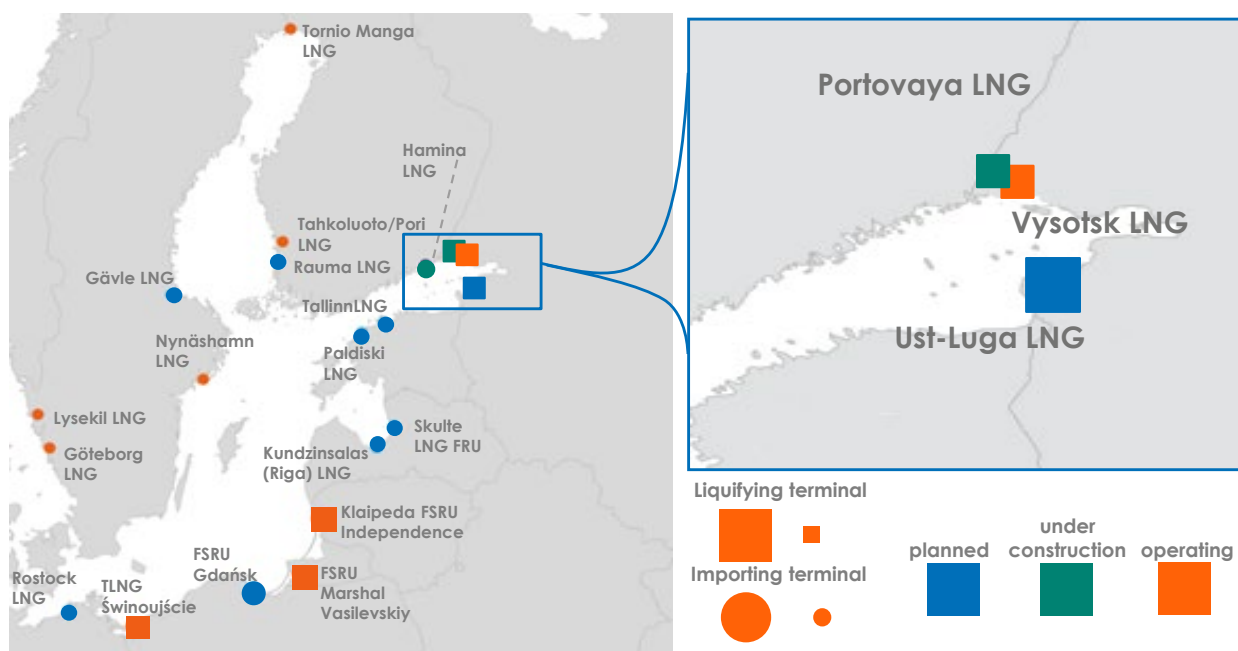
RUSSIAN LNG HIT BY COVID-19?

CASE STUDY OF BALTIC SEA BASIN

Liquefied natural gas (LNG) deliveries are mostly considered in the Central Eastern Europe as a way towards diversification of supply sources and easing the dominance of Russia's Gazprom in the region. However, the Russians also develop their LNG potential, becoming more and more visible on the Baltic Sea LNG market.

The Russian companies are currently mostly present within a small-scale segment (small-scale seaborne cargoes, bunkering, road tankers distribution), but in the future they might want to enter the large-scale regional market too.

LNG Terminals in the Baltic Sea region



Small-scale expansion underway

The LNG from Russia is being traded in the Baltic Sea region for several years already, as a number of Russian small-scale, inland liquefaction plants are functioning near the boundaries of the EU countries. The total capacity of these facilities (owned by Gazprom and/or Cryogas) is approx. 0.1 million tonnes per annum (MTPA) which corresponds to 0.13 billion cubic metres (bcm) of natural gas per year. Thus, their importance for the Baltic LNG market itself is limited. In 2019, the Baltic LNG market used for ship bunkering and supplies for small installations was estimated

at approx. 0.4 million tonnes (MT) or 0.6 bcm. Meanwhile, the maximum capacity of the entire Baltic small scale regasification installations and bunkering market can currently be estimated at 1.2 MTPA (1.7 bcm per year).

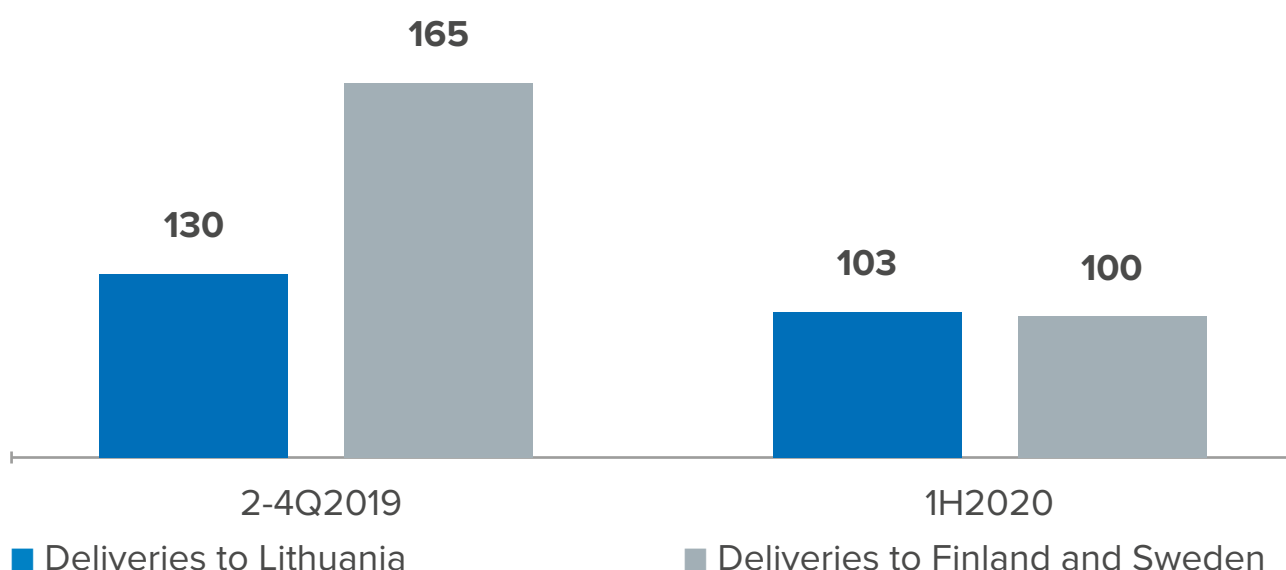
The situation, however, has changed drastically in April 2019, when Vysotsk LNG terminal (owned and operated by Novatek 51% and Gazprombank 49%) has been brought online, becoming the main Russian supplier for the regional small-scale market with its design

liquefaction capacity of 0.66 MTPA (0.9 bcm per year). Vysotsk-produced LNG is being distributed solely using small LNG carriers (loading capacity less than 10,000 m³). However, it has the ability to load LNG onto carriers with loading capacity 30,000 m³ and road tankers. In 2019 (i.e. in April-December of that year) nearly 0.3 MT (0.4 bcm) of LNG were delivered from Vysotsk to recipients

in Lithuania, Estonia, Sweden, and Finland. This volume corresponds to 60% of terminal export capacities (this is not tantamount to the overall utilization rate, as in 2019 approximately 0.09 MT of LNG (0.12 bcm) was also delivered to the Netherlands and Spain). In case of Lithuanian FSRU Independence, LNG from Vysotsk was responsible for 9% of supplies.

Seaborne deliveries from the Vysotsk LNG Terminal to the Baltic Sea region

thousand tonnes of LNG



Large-scale under control

Unlike in small-scale LNG segment, the Russian production has not yet gained a significant position within the Baltic Sea large-scale LNG market. In 2019, only one large delivery of Russian LNG took place (140,000 m³ LNG from Novatek's Yamal LNG terminal in the Arctic was supplied to the Lithuania's Klaipeda LNG Terminal), corresponding to less than 2% of the total largescale imports within the region. In 2020, the Russians did not deliver any large LNG cargo to the Baltic Sea. As for now, there is no information that a similar operation could be planned for the first half of 2021.

The Polish LNG terminal in Świnoujście (regasification capacity of 5 bcm per year) has

not yet received any Russian LNG cargo and such deliveries remain impossible in the nearest future due to the business (all regasification capacity booked by Poland's major PGNiG) and political (Polish government is reluctant to import Russian gas) reasons. Therefore, the situation in Poland contrasts with the one that can be observed in Lithuania, where is no consensus whether the LNG supplies from Russia should be accepted or not. On the one hand, the major industry players, state-owned Ignitis Group and private Achema, are keen to import Russian LNG as long as it is cheaper than the one from other sources. On the other hand, such business-first attitude meets criticism and political pressure in Lithuania too.

What will future bring?

According to Russian companies' plans, the Russia-originated LNG should further expand in the small-scale segment and the Russian large-scale liquefaction projects in the Baltic Sea region (Portovaya LNG, Ust-Luga Complex) should be completed. However, meeting these goals may be additionally difficult today, as COVID-19 looms over the global economy and gas markets.

Firstly, pandemic has halted the previously-projected growth of the LNG bunkering market in the Baltic Sea region, affecting plans to further expand Vysotsk liquefaction terminal to 1.32 MTPA. Novatek CEO, Leonid Mikhelson, had announced already in December 2019 that the decision in that regard would be delayed, and it was further confirmed already after the COVID-19 outbreak, which resulted in the decrease of profitability of the terminal and, thus, in decrease of its utilization rate from over 80% in 2-4Q2019 to less than 70% in 1-2Q2020.

Secondly, COVID-19 appears as a major problem regarding the Russian planned large-scale liquefaction project in the Baltic Sea: the complex for processing ethane-containing gas and LNG production (Complex) in Ust-Luga with the design capacity of 13 MTPA of LNG. Both companies behind the investment – Gazprom and RusGazDobycha – have no experience

regarding the construction of large-scale liquefaction terminals. Moreover, the Complex is to cost nearly USD 25-30 billion, and neither Gazprom nor RusGazDobycha possesses financial resources required. Especially, as the Russia's state development corporation VEB. RF, which was to co-finance the investment, declared in May 2020 it will not be able to secure the money needed from the National Wealth Fund (NWF), as the latter will have to cover the Russian budget gap expected to occur in two years. In November 2020 Gazprom admitted for the first time that the planned opening date of the complex in Ust-Luga (4Q2023 I stage and 4Q2024 for II stage) could be delayed.

Thirdly, COVID-19 has also affected Gazprom's plan to launch in 2020 another large-scale liquefaction terminal in the region, Portovaya LNG. The construction works have already reached their final stage but, according to the recent statements, the facility shouldn't start commercial work before the end of 2021. Due to the possible over-capacity in the European gas markets in 2021 (inter alia, related to third and fourth wave of COVID-19), it cannot be excluded that Gazprom will once more postpone opening of the terminal, this time to 2022 (Portovaya LNG was initially scheduled to be operational in 2018).

Conclusions

COVID-19 poses a threat to Russian LNG projects in the region. COVID-19 pandemic negatively impacts the profitability of LNG deliveries, along with the financial situation of Russian energy companies and the national budget. This can lead to delays or even to Russia's withdrawal from some Baltic projects in the LNG sector. The most at risk seems to be the Ust-Luga Complex. At the moment, it remains unknown if the new financing scheme will be secured and how the schedule of the Complex completion will be affected (the I and II stage of

investment was supposed to be completed in 2024-25).

COVID-19 pandemic has also led to postponing the investment decision regarding the planned expansion of the Vysotsk LNG terminal. That is especially important as the expanded Vysotsk LNG terminal was supposed to supply the planned transshipment terminal in Rostock, Germany. The LNG cargos would be exported from this terminal to Germany, Poland and possibly even to the other CEE countries.

Poland to remain inaccessible for large-scale deliveries from Russia.

It seems impossible that Russian large-scale LNG deliveries could reach Polish gas market, as all of the regasification capacities in Świnoujście LNG Terminal are booked by Poland's PGNiG and the Polish government's policy discards importing Russian gas in the future. Therefore, the Russian LNG will remain to be delivered to Poland by road trucks only from small inland plants of Gazprom and Cryogas. However, such imports of Russia-originated LNG to Poland might increase sufficiently in the future, when Novatek's transshipment LNG terminal in Rostock will be commissioned, enabling additional supplies to the country via Germany.

Portovaya LNG production to be shipped outside the region?

The ongoing COVID-19 pandemic should not stop Portovaya LNG from being opened, but it has affected the launch time of the Portovaya LNG liquefaction terminal - it was not opened in 2020 (as it was announced

before the COVID-19 pandemic), but it rather will be opened in 2021 or 2022. However, even if the Russian total capacity will then increase fourfold, it is not likely to translate directly into the Russia's LNG exports growth within the Baltic Sea region. According to Gazprom, the LNG coming from the Portovaya terminal shall be shipped to other markets, being at the same time an emergency gas source for Kaliningrad region. However, it cannot be ruled out that the Russians may change their mind in the future and try to enter the LNG large-scale market also on the Baltic Sea, if such a possibility arises.

Demand for the Russian small-scale LNG stays strong. That is worth underlining that the regional interest in Russian small-scale LNG deliveries did not diminish, even taking into consideration the COVID-19 pandemic and lockdown imposed in some of the countries. In the short-term perspective, the current LNG imports from Vysotsk terminal should remain at the current level.

ENVIRONMENTAL THREATS OF NORD STREAM 2: HOW DOES THE PROJECT AFFECT THE ENVIRONMENT?

At a time when economic and political arguments are widely used by both supporters and opponents of Nord Stream 2 gas pipeline, the environmental impact of the Russian project remains largely in the shadows.

However, the environmental damage from Nord Stream 2 project is significant and can be tracked at all stages of its implementation: from the Yamal gas fields to the entry point in Germany, from the local level to the global impact.

1. The Yamal Peninsula, north of Western Siberia, is rich in natural gas deposits (explored reserves - 26.5 Tcm). However, it is rich not only in gas: indigenous people engaged in reindeer herding - the Nenets and Khanty - live here. The development of new gas fields is destroying their natural habitat and way of life, as gas production facilities are obstacles to migration, and due to Gazprom's seizure of territories they are left without land for pasture (grazing).

2. Due to technological imperfections, a significant share of gas is simply flared at production stage or vented into the atmosphere, thus increasing greenhouse gas emissions. According to the World Bank, Russia is the world's largest gas flaring country (in 2018, Russia accounted for almost 21.3 bcm flared). There are about 1,500 such flaring units on the Yamal Peninsula. In 2015, the Yamal Prosecutor's Office recorded an excess of methane emissions by six times, and carbon black - by 37 times.

3. Invasion of a unique ecosystem of the Kurgalskiy State Nature Reserve (Leningrad region) for pipeline infrastructure construction threatens the protected species of flora (European featherfoil, spoonleaf sundew, neottia nidus-avis, aulacomnium moss) and fauna (white-tailed eagle, horsehead seal, ringed seal), as well as entire ecosystems – relic dunes and swamps.

4. Construction of the gas pipeline through the Baltic Sea region with chemical weapons landfills, including the area of diffuse emissions, is dangerous and poses a risk of environmental disaster.

5. Nord Stream 2 will pass near nature conservation areas Natura 2000 in eight EU countries, including 5 Natura 2000 sites in coastal areas and Germany's exclusive economic zone, which poses a threat of destruction to unique natural environments.

6. A trench up to 80 meters wide is dug through the seabed to lay the pipeline, with 254 tons of bioavailable phosphorus to be released in the Bay of Greifswald alone. It is absorbed by algae as a fertilizer, leading to «blooming» of waters and oxygen deficiency, which results in mass mortality of plants and animals in the Baltic Sea.

7. The project has already polluted the Baltic coast with toxic lubricants during construction, as well as with systematic leakage of harmful substances – about 145 kg of lubricating grease was spilled on the Bay of Greifswald shores.

8. EUR 9.5 billion in investment shall be repaid in the coming decades, leaving Germany and Europe constrained in their climate goals by a new gas infrastructure project. By the way, in Europe, gas is no longer considered as a «transitional» fuel - even given the relatively low emissions from combustion, its total greenhouse footprint is significant. Studies of Client Earth indicate that, if the Nord Stream 2 project is launched, CO2 emissions will increase by 106 million tons, which is comparable to the annual emissions of a country like the Czech Republic.

LEGAL REVIEW

In May 2020, the [Decree](#) of the President established the Council of Experts on Energy Security, headed by Secretary of the National Security and Defense Council (NSDC) Oleksiy Danilov. The approved regulations defines the Council's role as an advisory body to the NSDC, outlines the main tasks (including the development of proposals for countering and neutralizing threats). At the end of September, at a [meeting](#) of the Council, Danilov said it should become a platform for the development of the Energy Security Strategy and the definition of specific measures. According to the participants of the meeting, the energy sector of Ukraine «is in a critical state due to an unbalanced management system and unsatisfactory financial condition of enterprises.» The topic of the heating season and resolving the situation with imbalances in the electricity market, etc. was also raised.

Nuclear safety

The [Decree](#) of the President of September 22, 2020, No. 406/2020 is aimed at ensuring the smooth operation of the nuclear energy sector. The document focuses on such items as the creation of a long-term strategy for the development of nuclear energy, the construction of new reactors at the Khmelnytskyi NPP, faster corporatization of Energoatom and the repayment of debts in the electricity market. The decree is quite contradictory given the idea of transferring the management of Energoatom from the Ministry of Energy to the Cabinet of Ministers as well as the very nature of the President's instructions to the government, which is not in accordance with the Constitution.

The [Law](#) «On Amendments to Certain Laws of Ukraine on the Safety of Nuclear Energy Use» No. 613-IX of May 19, 2020, restored the independence of the State Nuclear Regulatory Inspectorate (SNRI) in the field of supervision over compliance with safety requirements in

On September 14, 2020, the [Decree](#) of the President enacted the NSDC decision «On the National Security Strategy of Ukraine». The approved Strategy outlines the main ideas and priorities of Ukraine's national interests, focuses on current and projected threats, as well as on foreign and domestic policy activities to ensure national interests and security. One of the items includes Ukraine's integration into the EU energy space, increasing Ukraine's energy potential, and increasing energy efficiency. The NSDC decision includes a task for the Cabinet of Ministers to develop and approve the Energy Security Strategy of Ukraine in the next 6 months.

the field of nuclear energy use and licensing of activities in this field. Rejection of general regulation in favor of a specialized «regulator» of nuclear and radiation safety is in line with international norms and obligations of Ukraine.

The [governmental draft Law](#) No. 3869 of July 16, 2020, is aimed at creating an opportunity to use the recommendations (consultations) of qualified radiation protection experts. I.e., the document defines the basic requirements for a person who intends to become such an expert, in order to plan and implement measures for radiation protection of personnel and the public. The Cabinet of Ministers is tasked with approving the regulations on the radiation protection expert, determining the list of competences, requirements for knowledge and practical skills, as well as the procedure for recognizing such competences.

The [draft Law](#) No. 4181 of October 1, 2020, was also introduced by the government. It brings in line with the legislation the procedure for appointing the Chief State Inspector for Nuclear

and Radiation Safety of Ukraine (formerly the President, proposed by the Cabinet of Ministers) and the issue of salaries of state inspectors for nuclear and radiation safety.

Electricity storage systems

In the matter of legal regulation, two legislative initiatives are considered.

The [draft Law](#) No. 2496 of November 26, 2019, defines the legal, economic and organizational principles of operation of storage systems in the electricity market and beyond. Its rules restrict transmission and distribution system operators from owning, developing, managing or operating energy storage facilities, unless storages are fully integrated network components that are not used for balancing or congestion management. However, even in such situations, the opportunity arises only with the permission of the energy regulator.

The [draft Law](#) No. 2582 of December 12, 2019, proposes amendments to the Law «On the electricity market». The law defines the terms «energy storage system» and «storage system operator» (licensed activity for systems with 5+ MW capacity). It is also envisaged to supplement the respective tender procedures for the construction of generating capacity. The document stipulates that the transmission / distribution system operator is allowed to use storage systems only to ensure operational safety and other measures aimed at meeting the requirements of system integrity. This does not require the TSO to obtain an additional license for the operation of energy storage systems. At the same time, the TSO is allowed to operate storages with a capacity of up to 250 MW in cases where «such services are not available on the market and solely for the purpose of providing dispatch services» (in particular, to ensure operational safety, balancing and other measures aimed at system integrity).

To remind, in October 2019, Ukrenergo signed two memorandums for the implementation of such projects: on cooperation with the French TSO RTE (installation of a 200 MW storage system), and with the EBRD (implementation of a storage system project). At the same time, [according](#) to Network Operations and Development Director of Ukrenergo Oleksiy Brecht, the TSO plans to sell the 200 MW storage system to investors (in lots, 20 MW each) after its construction and commissioning.

This will ensure compliance with the principles of European law ([Directive \(EU\) 2019/944](#)) on the prohibition of transmission system operators regarding the ownership, management and operation of storage systems. This approach will also avoid risks to competition and market development – in particular, in the balancing market and the ancillary services market.

In addition, the Low Carbon Ukraine project [estimates](#) that the lack of new investment in accumulation systems in Ukraine is not due to the gaps in primary legislation, but to the market distortions and barriers. On the legislative level, only clear and justified exceptions should be set, in accordance with Directive (EU) 2019/944, which may allow system operators to own and use storage systems in order to avoid negative consequences for the whole market. Analysts also remind that the [Law](#) No. 2712-VIII of April 25, 2019, provides, inter alia, for the development of a draft law on incentives for the installation of storage facilities at power plants.

Special focus: draft Law «On the basics of energy security»

In June 2019, the Ministry of Energy [published](#) conceptual provisions of the draft law and relevant presentation materials. In particular, key definitions were developed, the tasks, functions and powers of public authorities were clarified, and the mechanisms for implementing the policy were defined - including Energy Strategy as a policy document for the long term, the Energy Resilience Plan for the short term (up to 5 years), and also the energy balance as a form of resource and technological base assessment.

Next portion of the document [contained](#) provisions on assessing the level of threats and energy security of Ukraine, which provides for the annual preparation of the Energy Security Report (classified) and the Energy Security Threats Assessment (public), as well as risk management system and the regime of Ukraine's energy sector functioning in an emergency. Inter alia, the draft defines the role and responsibilities of the Interagency Crisis Task Force in Energy and the Interagency Commission (Coordination Center) on Energy Security.

Third part of provisions [included](#) regulation of the actions in case of a crisis, requirement to form minimum reserves of energy resources (oil and oil products, nuclear fuel, coal) and equipment, as well as the procedure for imposing restrictive measures (e.g., temporary restrictions on market rules, trade operations, transfer of management over critical infrastructure facilities). An interesting component is the provision on financing of such activities. For instance, 50% of the market players' spending to comply with the law shall be included in tariffs and/or prices for relevant services (products), while the creation of minimum stocks should be done at the expense of businesses under public-private partnership.

The Ministry also managed to [hold](#) public discussion of the draft. As the rationale, its representatives [indicated](#) the lack of a holistic approach to the development and implementation of public policy in the field of energy security. However, since September 2019, no further activity was reported.

The draft law quite clearly outlines, under which conditions its provisions can be applied, and defines the areas of responsibility among key authorities. An important aspect is that the draft takes into account Ukraine's international obligations – setting up competitive markets, integration with ENTSO-E etc., – and the implementation should be based on the Energy Strategy and relevant plans.

In general, the document is designed to prevent critical situations, as evidenced by the emphasis on diversifying energy sources, forming stocks and efficient consumption, as well as increasing the number of market participants, i.e. fostering competition. The implementation of such combined measures shall contribute to the achievement of security goals, i.e. minimizing the risks.

At the same time, the draft law does not propose a list of specific threats, but instead offers an approach to their definition. It mentions short- and long-term threats, external and internal ones. As expected, the National Security and Defense Council will form such lists and approve (revise) them every 5 years.

Particular attention should be paid to weak spots - the provisions which require additional efforts. E.g., although setting risk management system at different levels, its application locally field and at enterprises is not specified, with no details on the coordination between different levels. The draft law also refers to the creation of several plans, in particular for cooperation in the case of energy supply disruption, for recovery, and for the protection of critical infrastructure. However, it is not clear how these plans should work in conjunction with the risk management system.

Mechanisms for financing energy security measures are not clearly defined as well, which is one of the most important factors in emergency response. Earmarked funding mechanisms are provided only in certain areas. The draft law requires a proper impact assessment, in particular as regards the additional financial burden on energy market players.

USEFUL READING

(reviews)

Paolo Mastropietro, Pablo Rodilla, and Carlos Batlle. [Emergency Measures to Protect Energy Consumers During the Covid-19 Pandemic: Global Review and Critical Analysis](#) //

Florence School of Regulation, Robert Schuman Centre for Advanced Studies - Policy Brief, Issue 2020/22 (June 2020).

The policy brief provides an overview how major governments of the world introduce emergency measures aimed at protecting consumers in the pandemic and economic crisis. The authors focus on systematizing these actions to identify best practices (under certain conditions). Thus, emergency measures are classified into 6 groups:

1. Disconnection Bans

This is by far the most common measure in almost all countries, aimed at meeting the basic energy needs of quarantined households. It is most often associated with the Energy Bills Deferral. Although the authors note this is an important mechanism for consumer protection, it is still important to focus on targeting the most affected groups. After all, consumers who did not suffer financial losses during the pandemic may try to take advantage of the situation and abuse it.

2. Energy Bills Deferral and Payment Extension Plans

This measure is aimed at delaying payments due to the inability of consumers (due to the pandemic) to fully provide themselves with financial resources. Most countries have lifted any interest rate for unpaid bills. The difference is in the terms for which the deferral is granted. E.g., that ranges from 3 months in Germany and 6 months in Italy to 24 months in Peru and 36 months in Colombia. The problem is that governments, declaring the introduction of deferrals only for those who have suffered financially, have not developed mechanisms to identify affected consumers.

The problem of this approach may be the energy retail systems in countries. Where discounts are offered by gas suppliers, consumer segmentation may occur and end-users who receive energy from different supply companies may receive different assistance (insufficient or vice versa).

3. Enhancement of Energy Assistance Programmes

These programs are very heterogeneous in nature and differ in the ways of providing and defining target groups. E.g., in countries where subsidy systems are developed and 'social' energy tariffs exist, deadlines for applying for aid programs have been postponed (Italy, Ukraine). Some countries are also increasing economic assistance for heating for certain households (New Zealand, Australia). In fact, the approach is based on increasing aid for those whom the state considered vulnerable before the pandemic. In another approach, countries are expanding the list of vulnerable consumers to include the groups most affected by COVID-19 (Minnesota, Spain) or paying energy bills for households with members who became unemployed recently.

4. Energy Bill Reduction or Cancellation for all

Unlike the previous measure, the reduction of bills fully affects all consumers. Countries are introducing a reduction in mandatory bill payments (in electricity – Cyprus, Dubai, Nepal, Florida, Maldives), removing some regulated charges (Ontario, Slovenia), or even a total cancellation of energy bills for all residential customers during the lockdown (Bolivia, Chad, for some consumers – Ghana, Thailand, Bahrain).

Chile and Poland prohibited any upwards revision of energy tariffs during confinement measures.

5. Measures for Commercial and Small Industrial Activities

In some countries, economic assistance is provided not only to households, but also to industrial consumers. E.g., in Spain, it is possible to suspend a gas supply contract during the pandemic and renew it afterwards. In France, industrial consumers are given a deferral of bills and suppliers are prohibited from charging any fine for non-payment.

Energy suppliers can suffer serious losses, so it is important to maintain their financial liquidity. Payments from the state (lending, financial assistance) should be provided at low interest rates, with inclusion in the stimulus packages considered as the most efficient solution.

6. Creation of Funds and Other Support Measures to Suppliers

The above measures require significant funding from the state, so special funds are created, which accumulate resources for bill reductions/cancellations and for the enhancement of energy assistance programmes. Due to the significant reduction in demand for energy resources, resource suppliers suffer, so the governments of some countries additionally pay or compensate losses to suppliers.

E.g., Italy has set up a special USD 1.5 billion fund so that retailers can apply for a loan in case of financial difficulties. In Texas, the state government pays 0.33 USD/MW surcharge on the tariff to cover debts of affected consumers. Many regulators also exempt suppliers from paying energy taxes and network fees (relative to unpaid bills).

Conclusions

The pandemic has hit energy markets around the world significantly, ultimately affecting consumers and jeopardizing basic energy needs. All measures discussed in the brief are economic assistance to vulnerable users. According to the authors, it is very important to implement targeted mechanisms for affected consumer groups, as support measures introduced in many countries are often aimed at those who do not need this assistance. It is worth focusing on existing consumer protection systems, simplifying access to them. This will help make better use of available resources. It is also important to ensure that energy suppliers maintain their liquidity.

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