



Focus on Energy

ACM contributes towards the acceleration of the energy transition

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The Netherlands Authority for Consumers and Markets (ACM) regulates the Dutch energy markets. It conducts oversight over the entire energy chain, from energy wholesale markets and energy networks to the delivery of energy to consumers. ACM regulates the gas networks, the electricity grids, and the heat networks. In addition, ACM sets the maximum tariffs that the system operators of these networks are allowed to charge their users. Also, ACM ensures market integrity and transparency on the wholesale markets for energy products. It also ensures that energy suppliers are reliable, and that the tariffs and conditions for the delivery of electricity and natural gas to consumers are reasonable.

ACM is an independent regulator, and puts solving problems first in its regulatory efforts. ACM sets rules, and conducts market investigations. In addition, ACM is actively engaged with stakeholders, educates businesses and consumers, and gives solicited and unsolicited advice to the Dutch legislature. ACM enforces compliance with the rules where necessary.

Focus areas for 2025

The energy system is undergoing massive changes due to the energy transition. Binding climate goals have been agreed on at the European and national levels. Net CO₂ emissions must be zero or negative from 2050. That is why a transition is taking place from fossil fuels to sustainable energy sources. At the same time, demand for electricity keeps on growing. The energy transition is progressing but has come under pressure at the moment. One of the bottlenecks is the increasing congestion on the grid, as a result of which electrification is stagnating. In addition, development of heat networks is lagging behind. The binding climate goal of a 55-percent emissions reduction in 2030 compared with 1990 levels is getting out of reach. In order to reach that goal, additional policy measures are needed that produce reductions quickly (source: Climate and Energy Outlook of the Netherlands 2024, PBL Netherlands Environmental Assessment Agency). That is why it is critical to accelerate the energy transition.

In its role as regulator of the energy markets, ACM contributes towards the acceleration of the energy transition (see [ACM's focus areas for 2025](#)). ACM does so by making necessary changes and innovations possible in the energy system, with an eye to affordability, a fair distribution of costs, and security of supply. Extra attention is given to grid congestion and to the interests of vulnerable energy consumers. ACM protects consumers against unreasonable prices, unreliable suppliers, and misleading customer-recruitment practices. ACM also offers consumers insight into energy prices through its energy monitors. With these efforts, ACM helps realize a reliable and sustainable supply of energy for people and businesses, now and in the future.

In its oversight over the energy sector, ACM in 2025 will give special attention to the following topics:

More capacity on the grid

The current grid was not designed for the rapid growth of sustainable energy and the electrification of the economy. Grid expansions are desperately needed, yet are time-consuming and costly. More and more businesses are waiting for a connection or expansion, which means that it is crucial to create more capacity on the grid in the short term too.

- ACM takes measures regarding flexible grid utilization in order to reduce grid congestion.
- Together with the Dutch Ministry for Climate Policy and Green Growth (KGG), ACM investigates where the existing grid can safely handle a heavier load, so that the existing grid can be utilized more.
- ACM urges the system operators to provide more insight into their grid loads, and to provide more transparency regarding the way in which they determine what investments are prioritized.

A stable, future energy system

Energy from solar and wind is not always available, and, in such instances, other energy sources are needed. ACM examines how security of supply can be maintained in the energy system of the future. In that context, ACM will identify different options for the energy mix, such as the use of renewable energy, hydrogen, and nuclear power. ACM analyzes the risks and opportunities of these options to contribute towards a stable and affordable energy system, and puts forward recommendations for maintaining security of supply in the future.

- ACM explores the opportunities of and the barriers to the functioning and evolution of energy markets, starting with a market-wide review of hydrogen.

Affordable energy and reliable suppliers

The energy transition must remain affordable and accessible, also for vulnerable groups. Since energy costs are rising, ACM pays close attention to the distribution of the costs and benefits of the energy transition among users, the increasing energy poverty, and unequal opportunities in society to participate in the energy transition. In order to keep the Netherlands competitive, it is important that the level playing field within the European Union is not disrupted.

- ACM drafts a feed-in tariff for producers, for a better distribution of the costs among grid users. This will also contribute to reducing grid congestion.
- ACM develops the new regulatory method for system operators for natural gas and electricity for 2027 and beyond. The new method will give ACM more options for a timely guidance of system operators.
- ACM keeps a close watch on energy and heat suppliers in order to protect consumers against unreasonable tariffs, unreliable suppliers, and misleading customer-recruitment practices. Through its monitors, ACM offers consumers insight into the tariffs for electricity and natural gas.
- At the European level, ACM advocates for a level playing field through a uniform interpretation and application of the European rules, for example, with regard to setting tariffs for connections and electricity transmission.

Incentives to invest and innovate

Unpredictable rules, high risks, and long payback periods make it harder to invest in the energy transition. ACM promotes a healthy investment climate by drafting, explaining, and enforcing stable and predictable rules. We are ready to sit down with market participants and discuss any obstacles that they encounter when applying innovations, for example, because rules seem to be standing in the way. In addition, ACM promotes innovations by way of pilot projects. By collaborating with other European regulators, ACM helps realize consistent cross-border investments in, for example, hydrogen networks.

New rules for the energy transition

The energy market is undergoing profound changes with the introduction of new laws such as the Dutch Energy Act and the Dutch Collective Heat Act (WCW). This offers businesses and consumers new opportunities for their energy transition. ACM plays an active role in the implementation and enforcement of these acts, which are crucial for a future-oriented energy system without fossil fuels, while paying attention to consumer protection and fair prices.

- ACM explains the applications of the new opportunities that the Dutch Energy Act offers, such as energy-sharing and energy communities, and, where necessary, takes enforcement action in order to protect consumers.

ACM's oversight over energy markets in 2025

In this Focus on Energy, ACM looks ahead at its activities in 2025 based on the following six topics:

1. Dealing with grid congestion
2. Tariffs that compensate for the utilization of grids and natural-gas networks
3. Reliability and security of supply, now and in the future
4. Protection of consumers
5. Heat as an attractive alternative
6. Market integrity and transparency on the wholesale markets

For each topic, ACM highlights several activities in individual text boxes. Many of these activities build on existing activities. This is obviously not an exhaustive overview of everything ACM does. ACM can reprioritize activities, if new developments so require.

1. ACM deals with grid congestion

One of the biggest challenges of the energy transition is current and future demand for transmission capacity. In that context, ACM works closely together with different stakeholders, including the system operators and the Ministry of KGG, also within the National Grid Congestion Action Program (in Dutch: Landelijk Actieprogramma Netcongestie, or LAN).

This demand for capacity not only calls for an expansion of the grid. It is just as important that the available capacity is utilized better and that more capacity is freed up on the existing grid. One of the solutions is to better spread usage temporally: sufficient capacity is often still available outside of peak hours. As a result, more users can be connected to the grid in the short term, thereby saving costs.

In 2025, ACM will promote flexible grid utilization by making possible even more alternative transmission rights. With group transport agreements, companies with a large connection are able to sign a single agreement for sharing transmission capacity. This allows companies that together form a single energy hub to get more capacity or a connection anyway, despite the lack of transmission capacity.

In 2025, ACM will boost the application of the measures introduced in 2024 for utilizing the grid in a more flexible manner. ACM will keep a close watch on the application of these measures, the effects thereof, and publishes reports about this. If necessary, ACM will force the use of congestion measures through enforcement actions. It is vital that system operators and grid users actively take advantage of the opportunities that are available. Where necessary, ACM will adjust the measures so that these better meet the needs, thereby producing an increased uptake.

In order to create more transmission capacity on the existing grid, ACM together with the Ministry of KGG will investigate where the grid can safely handle a heavier load, and the necessary interventions to realize that.

In addition, ACM in 2025 will explore, together with the system operators, further adjustments in the tariff structures in order to reduce congestion, for example, the introduction of a tariff structure where users with small-scale connections will pay based on their utilization of the grid. Households will thus be rewarded for efficient grid utilization in the form of lower tariffs. This new tariff structure is expected to be introduced in 2028. ACM will also examine how location-based tariffs can help alleviate congestion. Also, ACM is working on the introduction of a feed-in tariff for large producers, which is also expected to have a mitigating effect on grid congestion.

Finally, ACM will stimulate system operators to make the right, socially desired investments in the grids on time, and to be transparent about that. ACM will ask system operators to give more insight into the load on their grids, and to be more transparent about the way in which they determine what investments are prioritized. ACM will also ask system operators to offer more insight into their planning of and progress in the execution of the investments. ACM will ensure that system operators make sure that the investment plans that they submit to ACM in 2026 can be tracked more easily than the current investment plans with regard to those aspects.



Actions in 2025:

- [Publication of an overview](#) on how the opportunities and measures against grid congestion are used, based on ACM's recommendations in 2024, including guidance on possible adjustments to measures in order to increase their application.
- Decision on a net code that makes group transport agreements possible
- Draft net code decision for a feed-in tariff
- Publication about location-based tariffs
- Evaluation of the prioritization framework regarding the ability to prioritize projects that contribute to social objectives in connection with electricity transmission requests

2. ACM ensures that costs are distributed fairly through equitable tariffs for the utilization of grids and natural-gas networks

As a result of the energy transition and the thereto-associated large-scale electrification, major investments into the electricity infrastructure are needed. It is essential to strike the right balance between the affordability for grid users and what is necessary for the energy transition. With regard to the natural-gas network, it is the phasing-out of natural gas that poses the biggest challenge: what is the speed of that process, and who foots the bill, given the fact that the network needs to be paid for by an ever shrinking group of users? Through its regulation of the market, ACM determines the tariffs that system operators are allowed to charge.

In 2025, ACM will work out a new system for the regulatory methodology and tariff decisions. Instead of ex-post assessments, ACM will conduct ex-ante assessments of the costs of system operators in connection with expanding, upgrading, and adjusting grids and natural-gas networks. With this new system, ACM is able to intervene sooner, where necessary, and system operators have more certainty over the compensation of their costs.

ACM in 2025 will set a feed-in tariff for electricity products as well as a tariff for users of the off-shore grid. In that way, large producers, too, pay their share of the increasing costs for the grid upgrades and expansions that are necessary for transporting the power that they feed in. In that context, ACM will use the principle of cost reflectivity: costs are paid for by those that have caused them. Moreover, a feed-in tariff ensures that users in other countries, too, pay for the transmission of electricity over the Dutch grid.

Major investments are also needed in the infrastructure for drinking water and energy in the Caribbean Netherlands in order to accommodate the projected growth and to reduce oil dependence. ACM in 2025 will conduct efficiency assessments of the investment plans for expanding that infrastructure. In addition, ACM will take several decisions regarding tariff regulation.

Furthermore, ACM actively contributes towards the harmonization of network tariff structures within Europe in order to safeguard a level playing field in the EU. This is of great importance with an eye to Dutch competitiveness, especially now that the network tariffs are expected to go up tremendously as a result of the investments in the grids.



Actions in 2025:

- Draft method decisions for the regulatory period starting in 2027 for system operators for electricity and natural gas
- Draft net code decision on a feed-in tariff
- Draft tariff decision regarding the off-shore grid
- Publication regarding the review of cascading: the distribution of costs of a grid section (for example the high-voltage grid) among those that are connected to that grid section and those that are connected to lower grid sections
- Tariff decisions regarding the 2026 network tariffs for natural gas and electricity
- Method decision regarding the regulation of drinking water and electricity for the Caribbean Netherlands starting in 2026
- Maximum tariffs for electricity and drinking water in the Caribbean Netherlands for 2026

3. ACM considers reliability and security of supply, now and in the future

As a result of the energy transition, our energy comes more and more often from non-predictable energy sources, such as wind and solar. This has a major impact on the extent to which the energy system is able to meet demand for energy. In addition to the energy transition, international political (including geopolitical) developments greatly affect that extent, too. That is why the energy system as a whole must become more flexible. Other energy sources, such as hydrogen and nuclear power (or the expansion thereof), may play a role in that context. It is uncertain whether those sources are available on time.

ACM will identify various options for the future energy mix, and analyzes how choices therein contribute towards a stable (and affordable) energy system with 'security of supply'. There are many options for reducing the risks to security of supply. However, they all come at a cost. ACM will identify any obstacles to more flexible capacity, such as energy storage and demand response. At the same time, ACM will explore measures that can strengthen security of supply, for example by identifying the pros and cons of different forms of capacity mechanisms. ACM will publish these insights in order to help policymakers make choices with regard to measures safeguarding resource adequacy and to offer businesses certainty regarding investments.

As the regulator-designate for the hydrogen infrastructure, ACM will offer certainty regarding the conditions for access to this infrastructure. In addition, ACM will set the basic principles for the regulation of the tariffs for access to the hydrogen infrastructure.

The off-shore grid is an important component of the future energy system. The costs of the necessary investments in order to realize the off-shore objectives are substantial. That is why ACM finds it important that it is actively involved in the creation of the development framework Off-Shore Wind Energy (in Dutch: Windenergie op Zee), which determines the investment task of the system operator of the off-shore grid.

Reliability, safety, and good services cannot be at issue in the rapid expansion of the grids and the phasing-out of natural gas. That is why, through quality plans, ACM will ask system operators to identify risks with regard to reliability and safety, and to demonstrate how they will safeguard quality. In that context, ACM will also explicitly look at closed distribution systems, which are operated by private system operators.

Having proper processes for measuring energy is essential to the functioning of the energy system. Measurement data must be available in a timely manner, and must be reliable and complete. To that end, clear arrangements about access to data (and the exchange thereof) are very important. For example, reliable data is needed to match supply and demand as much as possible in a system where energy production is no longer controllable. Reliable data is also needed for having a good overview of the load profiles of the grids as well as of locations affected by grid congestion. That is why the Dutch Energy Act contains new rules for oversight over measurement companies as well as for the management, access to, and exchange of energy data. With the new abilities granted by the Dutch Energy Act, ACM will step up its oversight over the quality and transparency of data that are important to the energy transition.

Actions in 2025:

- Report about the tariffs for hydrogen transport and about the instruments for influencing these within the context of the evolution of the hydrogen market
- Publication about resource adequacy
- Consultations with Ministry of Climate Policy and Green Growth (KGG) about further fleshing out ACM's role with regard to ex-ante assessments of investments in the off-shore grid
- Study into the impact of the planned closure of the Norg natural-gas storage on the security of natural-gas supply; the assessment thereof is a deciding factor in the decision-making about this storage facility
- Oversight over the quality plans of system operators
- Intensified oversight over measurement companies, the measurement duty of system operators, and the exchange of measurement data



4. ACM protects energy consumers

ACM pays special attention to vulnerable groups in the energy transition, and helps consumers seize the opportunities that are available. ACM promotes the participation of consumers in the energy transition by clarifying the use of new opportunities offered by the Dutch Energy Act, such as energy-sharing and energy communities. In addition, ACM helps consumers by seeing to it that providers of new energy services offer transparent and honest information about such new opportunities. In that way, consumers are able to make well-informed decisions about, for example, suitable energy contracts, solar panels, or home batteries. Through its consumer information portal ConsuWijzer, ACM offers consumers free information about their rights. Also, in order to serve their interests, we support consumers when they take action, for example when switching, filing complaints, or making their livelihoods more sustainable. Since it is important that consumers in vulnerable positions in particular have access to energy, ACM seeks to make sure that suppliers and system operators comply with the rules that require them to prevent as much as possible cutting off customers that are behind on payments, for example.

ACM conducts oversight over energy suppliers and other market participants in order to prevent unfair practices, such as misleading practices, unreasonable contractual conditions, or excessive price increases. Transparent and fair energy prices for consumers are, and always will be, a priority. If prices are unreasonable, ACM will step in. In this fast changing market, ACM conducts another study into the amount and allocation of surcharges for solar panels. ACM regularly receives reports from consumers about, for example, unclear final bills and misleading customer-recruitment methods used by energy suppliers. ACM investigates these reports, and confronts suppliers if it turns they are not fully compliant. In the case of violations, for example because a supplier engages in unfair commercial practices, ACM can impose sanctions.

In 2025, ACM will add conditions about feed-in costs to the model contracts that all energy suppliers must offer, and it introduces a model contract with fixed prices for at least one year. With these different model contracts, consumers always have sufficient choice of energy contracts, even if the selection of contracts is shrinking, as is what happened during the energy price crisis.

ACM in 2025 will continue to conduct strict oversight over suppliers. ACM continuously monitors the financial and organizational fitness of all suppliers with licenses. ACM identifies risks to the delivery of energy to consumers on time. Where necessary, ACM takes action, and publishes about it. As a last resort, ACM can revoke the license. Even with strict oversight over suppliers, it can happen that an energy supplier goes bankrupt. If a supplier leaves the market, ACM ensures that delivery of natural gas and electricity to consumers at reasonable prices and conditions remains guaranteed. ACM advises the Ministry of Climate Policy and Green Growth (KGG) on how the new rules laid down in the Dutch Energy Act can be elaborated in subordinate legislation, so that consumers are better protected in these kinds of situations. In addition, the Dutch Energy Act offers ACM improved opportunities for assessing license applications, for example by assessing the supplier's executives' integrity.



Actions in 2025:

- Monthly publication of the Monitor on the consumer energy market
- Biannual report about the financial and organizational fitness of energy suppliers (or about ACM's oversight thereof)
- Education about the opportunities and points of attention regarding energy-sharing and energy communities
- Strict selection process for license applications for supplying energy to consumers
- Reducing the likelihood of bankruptcy of energy suppliers as a result of strict permanent oversight
- Expanding the model contracts with fixed-rate contracts of least one year as well as attention to feed-in costs
- Evaluation of the rules regarding early-termination fees
- Conducting checks whether the origin of power matches with what energy suppliers tell their clients via the power disclosure labels
- Conducting investigations, and if necessary imposing sanctions, following consumer reports regarding unreasonable prices, conditions, or unfair customer-recruitment methods used by energy suppliers

5. ACM focuses on collective heat as an attractive (or more attractive) alternative

Collective heat as an alternative to heating based on natural gas or electricity is necessary for achieving the climate goals. Research shows that the creation of a collective heat solution in certain districts and neighborhoods is, from a social perspective, the most efficient. However, only if the affordability and reliability of collective heat systems as well as the heat supplier's service are in order can heat truly be an attractive alternative from the perspective of users. ACM believes that there is still room for improvement in that area.

In 2025, too, ACM will conduct an investigation into the financial returns of heat suppliers. If it turns out that a heat supplier has earned excess profits as a result of an unreasonably high return, ACM will ensure that those profits are 'returned' to that supplier's customers by way of a reduction of the heat prices of that supplier.

What a reasonable return is, is determined by ACM by setting a WACC (Weighted Average Cost of Capital), and by making arrangements about what data can be taken into consideration when calculating the return in the RAR (Regulatory Accounting Rules). In 2025, ACM will set the WACC once more, and ACM will tighten the RAR. This enables ACM to set the returns more accurately.

The Dutch Heat Act protects heat consumers that are bound to a single supplier. Not all forms of heat services fall under the Dutch Heat Act. In 2025, ACM publishes guidance, providing more clarity about what heat systems fall or do not fall under the Dutch Heat Act. ACM takes action against heat suppliers that wrongfully have no heat-supply license, and it takes action against heat suppliers that do have licenses, but do not comply with the Dutch Heat Act.

ACM regularly receives reports from consumers that do not understand how their heat consumptions that their heat companies charge are determined. That is why ACM in 2025 will conduct a sector-wide study into the services of heat companies with regard to the measurement of heat consumption.

Additional and new rules are needed for further ensuring that collective heat becomes an attractive alternative, for example, new rules for the way in which rates are determined. With those, ACM is better able to protect consumers against unreasonably high rates. ACM is committed to ensuring that the new rules for heat prices sufficiently protect consumers and that they are feasible. In 2025, ACM will actively communicate about this.

In 2025, ACM will organize a seminar for heat companies about the effects of the new rules in the bill for the Collective Supply of Heat Act (in Dutch: Wet Collectieve Warmtevoorziening) on ACM's oversight over these companies.

Actions in 2025:

- Maximum heat tariffs for 2026
- New WACC and RAR for determining returns
- Investigations into returns of heat suppliers
- Publication to offer additional clarity about what heat systems fall under the Dutch Heat Act
- Enforcement action against suppliers that wrongfully have no licenses or do not act in accordance with the Dutch Heat Act
- Sector-wide study into services of heat suppliers with regard to the measurement of heat



6. ACM ensures market integrity and transparency on the wholesale markets for energy products

Integrity and transparency on the wholesale markets are essential for the affordability of energy as well as for safeguarding security of supply. Industry buys natural gas and electricity on the wholesale market. In addition, the wholesale market lays the foundation for consumer prices. Prices on the wholesale markets are higher and more volatile than before the energy price crisis. This is harmful for industry, and leads to higher energy prices for consumers. ACM ensures that trading on the wholesale markets for natural gas and electricity takes place in a fair and transparent manner by keeping a close watch on the wholesale markets (together with ACER and the Dutch Authority for the Financial Markets (AFM)), and by taking action in the case of undesirable market outcomes or prohibited trading practices.

In our monthly monitors on the wholesale markets, ACM offers insight into the energy markets, and identifies relevant market developments at an early stage. When observing price trends that cannot be explained by supply and demand, ACM conducts an investigation into possible market abuse. If enforcement action is needed, ACM opts for the most effective tool. Whenever possible, ACM publishes about its enforcement actions in order to offer the market clarity.

Actions in 2025:

- Monthly Monitor on wholesale tariffs and security of supply of natural gas, and monthly monitor on the wholesale markets for electricity
- Permanently monitoring for possible market abuse, and further investigation into algorithmic trading on energy markets, in collaboration with the Dutch Authority for the Financial Markets (AFM)
- Monitoring the registration of market participants as well as publications of inside knowledge, in order to ensure that the 'foundation' for ACM's oversight over the wholesale markets is in order.

