

# MEMO

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| <b>To</b>      | EFTA Surveillance Authority   |
| <b>From</b>    | CMS Kluge   |
| <b>Date</b>    | 23 March 2026   |
| <b>Subject</b> | <b>Complaint regarding Norway Price for electricity – Changes in electricity consumption among customers participating in the Norway Price scheme compared with those who don’t participate</b> |

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## 1. INTRODUCTION

Reference is made to our complaint regarding Norway Price for electricity, the Norwegian authorities’ submission dated 15 December 2025, and the meeting with ESA on 3 March 2026. In this meeting, we agreed not to comment, at least for now, on the entire submission by the Norwegian authorities, but rather on particular issues.

This memo provides empirical evidence concerning observed changes in electricity consumption. This information is directly relevant to the assessment of whether the Norway Price scheme complies with the Electricity Market Directive. The memo provides information submitted by six large distribution system operators (DSOs).

## 2. VARIATIONS IN ELECTRICITY CONSUMPTION FOR CUSTOMERS WITH AND WITHOUT NORWAY PRICE

The Norway Price scheme has been economically advantageous for households in Southern Norway (price areas NO1, NO2, and NO5), where all six reporting DSOs are located. These companies are among the largest DSOs in the country, and thus their data covers a substantial and representative share of electricity customers in the southern price areas.

It is important to note that households who have not chosen Norway Price are still covered by the national electricity support scheme, a separate and highly generous compensation mechanism. Consequently, no household in Norway pays the full market price. The data presented below therefore illustrates the additional distortionary effect caused specifically by Norway Price on top of existing measures.

The analysis covers the first five months of Norway Price. During this period, some months were milder than a normal year while others were colder. Despite this variability, the results show a clear and consistent pattern: Norway Price customers have exhibited significantly higher electricity consumption growth (or lower reductions) compared with the same months in the preceding year.

**October** - Changes in consumption (%) compared with the same month last year.

|                         | <b>Elvia</b> | <b>Lnett</b> | <b>BKK</b> | <b>Lede</b> | <b>Fagne</b> | <b>Glitre</b> | <b>Average</b> |
|-------------------------|--------------|--------------|------------|-------------|--------------|---------------|----------------|
| <b>Norway Price</b>     | 3.8          | 2.5          | 4.7        | 5.8         | 4.66         | 3.23          | <b>4.12</b>    |
| <b>Not Norway price</b> | 1.7          | -0.3         | 1.7        | 2.7         | 1.55         | 1.96          | <b>1.55</b>    |
| <b>Difference</b>       | <b>2.1</b>   | <b>2.8</b>   | <b>3</b>   | <b>3.1</b>  | <b>3.11</b>  | <b>1.27</b>   | <b>2.56</b>    |

**November** - Changes in consumption (%) compared with the same month last year.

|                         | <b>Elvia</b> | <b>Lnett</b> | <b>BKK</b> | <b>Lede</b> | <b>Fagne</b> | <b>Glitre</b> | <b>Average</b> |
|-------------------------|--------------|--------------|------------|-------------|--------------|---------------|----------------|
| <b>Norway Price</b>     | -0.14        | 1.5          | 3.9        | 2.4         | 4.37         | 2.71          | <b>2.46</b>    |
| <b>Not Norway price</b> | -2.36        | -1.5         | 1.3        | 0           | 0.83         | 0.89          | <b>-0.14</b>   |
| <b>Difference</b>       | <b>2.22</b>  | <b>3</b>     | <b>2.6</b> | <b>2.4</b>  | <b>3.54</b>  | <b>1.82</b>   | <b>2.60</b>    |

**December** - Changes in consumption (%) compared with the same month last year.

|                         | <b>Elvia</b> | <b>Lnett</b> | <b>BKK</b> | <b>Lede</b> | <b>Fagne</b> | <b>Glitre</b> | <b>Average</b> |
|-------------------------|--------------|--------------|------------|-------------|--------------|---------------|----------------|
| <b>Norway Price</b>     | -3.05        | 0.21         | -0.3       | 1.4         | 1.21         | 0.93          | <b>0.06</b>    |
| <b>Not Norway price</b> | -5.7         | -3.49        | -2.5       | -2.8        | -2.65        | -1.31         | <b>-3.07</b>   |
| <b>Difference</b>       | <b>2.65</b>  | <b>3.7</b>   | <b>2.2</b> | <b>3.9</b>  | <b>3.86</b>  | <b>2.24</b>   | <b>3.09</b>    |

**January** - Changes in consumption (%) compared with the same month last year.

|                         | <b>Elvia</b> | <b>Lnett</b> | <b>BKK</b>  | <b>Lede</b> | <b>Fagne</b> | <b>Glitre</b> | <b>Average</b> |
|-------------------------|--------------|--------------|-------------|-------------|--------------|---------------|----------------|
| <b>Norway Price</b>     | 15.5         | 18.7         | 19.37       | 18.8        | 11.81        | 24.29         | <b>18.08</b>   |
| <b>Not Norway price</b> | 10.6         | 14.5         | 13.33       | 13.4        | 7.38         | 20.43         | <b>13.27</b>   |
| <b>Difference</b>       | <b>4.9</b>   | <b>4.2</b>   | <b>6.04</b> | <b>4.4</b>  | <b>4.43</b>  | <b>3.86</b>   | <b>4.64</b>    |

**February** - Changes in consumption (%) compared with the same month last year.

|                         | <b>Elvia</b> | <b>Lnett</b> | <b>BKK</b> | <b>Lede</b> | <b>Fagne</b> | <b>Glitre</b> | <b>Average</b> |
|-------------------------|--------------|--------------|------------|-------------|--------------|---------------|----------------|
| <b>Norway Price</b>     | 20.5         | 17.8         | 18.2       | 23.24       | 16.69        | 22.55         | <b>19.83</b>   |
| <b>Not Norway price</b> | 15.3         | 13.8         | 12.8       | 17.5        | 13.31        | 18.83         | <b>15.26</b>   |
| <b>Difference</b>       | <b>5.2</b>   | <b>4</b>     | <b>5.4</b> | <b>5.74</b> | <b>3.38</b>  | <b>3.72</b>   | <b>4.57</b>    |

### **3. CONTRADICTING NATIONAL AND EEA ENERGY EFFICIENCY TARGETS**

The observed increase in consumption directly counteracts Norway's national target of reducing electricity consumption in buildings by 10 TWh by 2030 (relative to 2015). Achieving this target requires a consistent annual reduction of approximately 1%. The data clearly shows that the Norway Price scheme drives consumption in the opposite direction, undermining both national climate goals and the mandatory energy efficiency requirements under the EEA framework.

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