CMS Kluge

MEMO

To	EFTA Surveillance Authority
From	CMS Kluge
Date	12 April 2026
Subject	**Complaint regarding Norway Price for electricity – Share of electricity consumption covered by the Norway Price scheme**

1. INTRODUCTION

Reference is made to our complaint regarding the Norway Price scheme 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.

In its response letter, the Ministry of Energy referred to 16 percent of the total electricity consumption being covered by the Norway Price scheme. The purpose of this memo is to demonstrate that this figure represents a national average and therefore masks significant regional and temporal variations. We believe it is important to nuance this picture, as Norway is divided into five bidding zones and wholesale electricity prices are set on a quarter-hourly (15-minute) basis.

In this memo, we demonstrate how this share varies over the year and across different bidding zones. Our analysis is limited to the bidding zones in Southern Norway (NO1, NO2, NO5).

2. SHARE OF ELECTRICITY CONSUMPTION COVERED BY THE NORWAY PRICE SCHEME

NO1

The NO1 bidding zone covers Oslo and large parts of Eastern Norway, extending northwards toward Trøndelag. The area has significant interconnection capacity with NO2 and NO5, as well as with Sweden.

In a normal hydrological year, NO1 is a deficit zone, meaning local generation is insufficient to meet demand. This is particularly evident during winter, when there is a substantial need for imports from other bidding zones.

Electricity consumption in NO1 is characterized by a high share of demand from households and the service sector.

Households consume three times as much electricity in January as in August. Other sectors have a more stable consumption throughout the year, although the service sector also experiences higher consumption in winter. Households and holiday homes accounted for 41 percent of total consumption in August 2025, compared to 56 percent in January 2026.

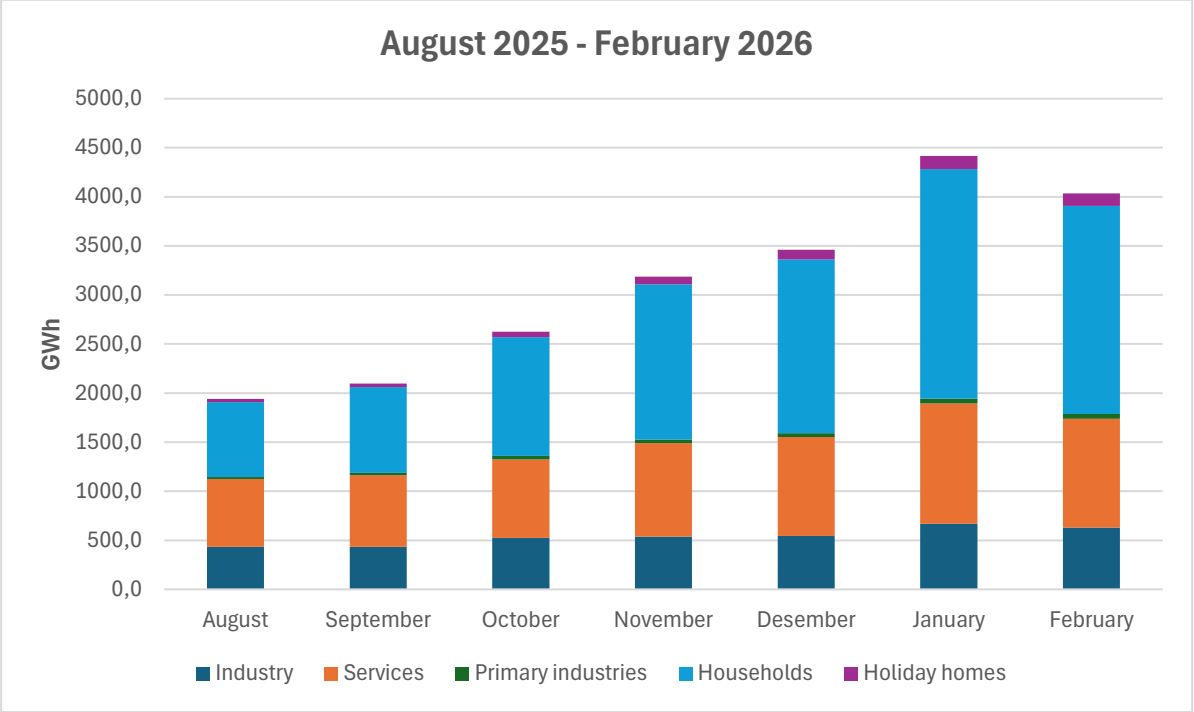


Figure 1. Electricity consumption in NO1[1]

The table below presents the share of electricity consumption in this bidding zone covered by the Norway Price scheme as of the 15th of each month. As the Norway Price scheme is a fixed agreement entered into until 31 December 2026, the share of household electricity consumption covered by the scheme increases with each passing day. In practice, there is no possibility to terminate the agreement before its expiry date. We have combined households and holiday homes.

	October	November	December	January	February
Households' share of total electricity consumption	48.2	52.1	54.0	56.0	55.7
The share of household electricity consumption covered by the Norway Price scheme	48.8	58.0	62.9	68.1	71.1
The share of total electricity consumption covered by the Norway Price scheme	23.5	30.2	34.0	38.1	39.6

Table 1. Electricity consumption in NO1 covered by the Norway Price scheme in percent.[2]

At its peak, the share of consumption covered by the Norway Price scheme accounted for approximately 40 percent in a single month in NO1. This share is expected to increase, as it is profitable for households in NO1 to participate in the scheme. It is important to note that 40 percent is the average for the month in this bidding zone. In individual hours, the share may be higher, resulting in a greater price impact.

[1] https://elhub.no/data-og-innsikt/datakatalog

[2] https://elhub.no/data-og-innsikt/statistikk-for-norgespris

NO2

The NO2 bidding zone covers the southern and western parts of Norway, extending northward towards Bergen. The zone has substantial interconnection capacity with NO1 and NO5, as well as with Denmark, Germany, the Netherlands, and the UK.

NO2 is the bidding zone in Norway with the highest reservoir capacity for hydropower and, in weather-normal years, it is a zone with a significant surplus in power production.

Electricity consumption in NO2 is characterized by a large share of industry. At the same time, demand from households and holiday homes is high, and winter demand from this sector increases sharply. Industry has a more stable level of consumption throughout the year, and variations are likely due to maintenance shutdowns in production or temporary closures caused by high power prices or drop in demand.

Households and holiday homes accounted for 19 percent of total consumption in August 2025, compared to 37 percent in January 2026.

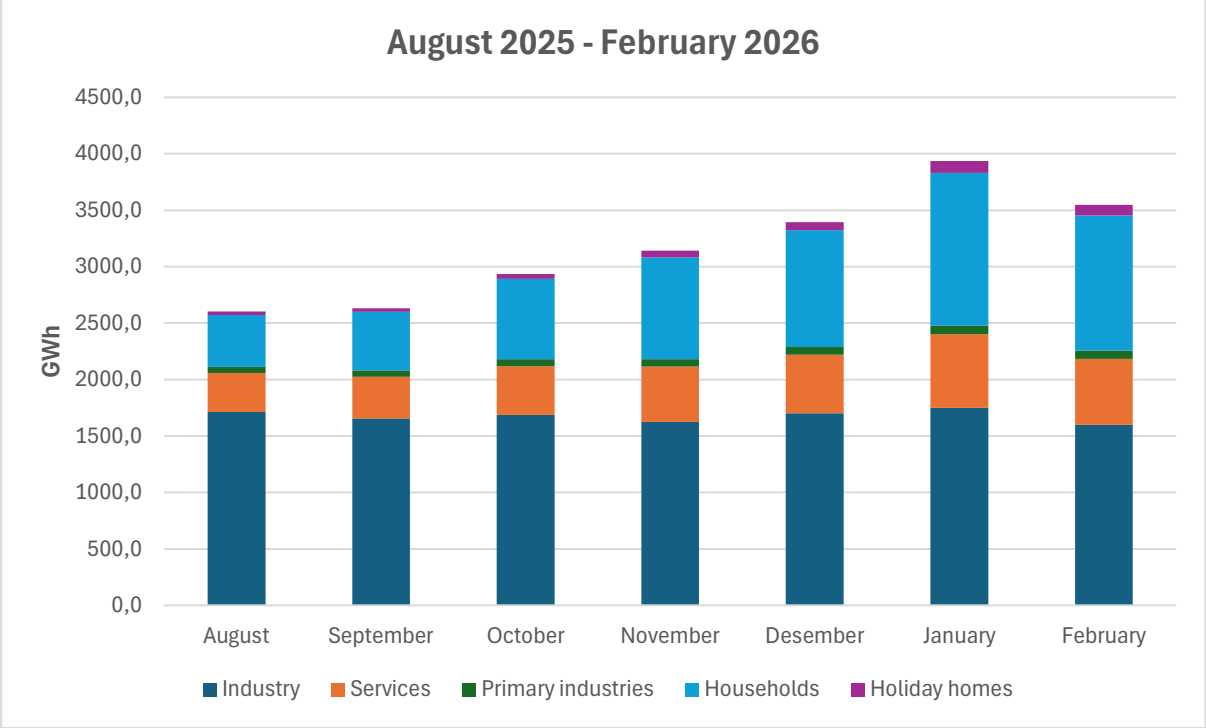


Figure 2. Electricity consumption in NO2[3]

In the table below, we have used the share of electricity consumption in this bidding zone covered by the Norway Price scheme as of the 15th of each month. As the Norway Price scheme is a fixed agreement entered into until 31 December 2026, the share of household electricity consumption covered by the scheme will increase with each passing day. In practice, there is no possibility to terminate the agreement before its expiry date. We have combined households and holiday homes.

[3] https://elhub.no/data-og-innsikt/datakatalog

	October	November	December	January	February
Households' share of total electricity consumption	25.7	30.6	32.6	37.0	36.4
The share of household electricity consumption covered by the Norway Price scheme	60.2	68.4	73.2	77.3	79.7
The share of total electricity consumption covered by the Norway Price scheme	15.5	20.9	23.8	28.6	29.0

Table 2. Electricity consumption in NO2 covered by the Norway Price scheme in percent.[4]

At its peak, the share of consumption covered by the Norway Price scheme accounted for approximately 29 percent in a single month in NO2. This share is expected to increase, as it is profitable for households in NO2 to participate in the scheme. It is important to note that 29 percent is the average for the month in this price area. In individual hours, the share may be higher, resulting in a greater price impact.

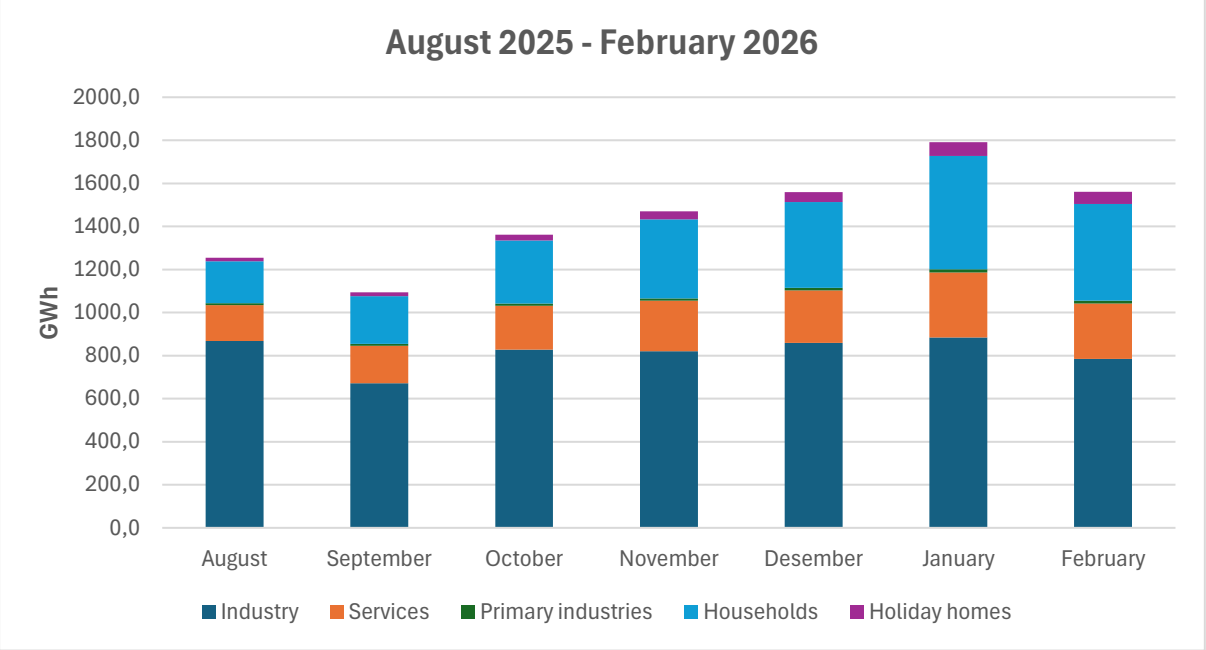
NO5

The NO5 bidding zone covers the western regions of Norway, extending northwards toward the Sognefjord. The zone has substantial transmission capacity to NO1, NO2, and NO3, but does not have interconnectors to neighbouring countries.

NO5 is a bidding zone with one of the largest hydropower reservoir capacities and, in weather-normal years, a significant surplus in power production.

Electricity consumption in NO5 is characterized by a substantial industrial share. At the same time, winter demand from households and holiday homes increases sharply.

Households and holiday homes accounted for 17 percent of total consumption in August 2025, compared to 33 percent in January 2026.



[4] https://elhub.no/data-og-innsikt/statistikk-for-norgespris

Figure 3. Electricity consumption in NO5[5]

In the table below, we have used the share of electricity consumption in this bidding zone covered by the Norway Price scheme as of the 15th of each month. As the Norway Price scheme is a fixed agreement entered into until 31 December 2026, the share of household electricity consumption covered by the scheme will increase with each passing day. In practice, there is no possibility to terminate the agreement before its expiry date. We have combined households and holiday homes.

	October	**November**	**December**	**January**	**February**
Households' share of total electricity consumption	23.5	27.4	28.5	33.0	32.4
The share of household electricity consumption covered by the Norway Price scheme	37.0	47.7	54.8	62.0	66.3
The share of total electricity consumption covered by the Norway Price scheme	8.7	13.1	15.6	20.4	21.5

Table 3. Electricity consumption in NO5 covered by the Norway Price scheme in percent.[6]

At its peak, the share of consumption covered by the Norway Price scheme accounted for approximately 21 percent in a single month in NO5. This share is expected to increase, as it is profitable for households in NO5 to participate in the scheme. It is important to note that 21 percent is the average for the month in this price area. In individual hours, the share may be higher, resulting in a greater price impact.

3. CONCLUSIONS

The share of total electricity consumption accounted for by the Norway Price scheme varies considerably between bidding zones and throughout the year. The analysis excludes NO3 and NO4 because very few households in these zones have chosen Norway Price. The most pronounced impact is observed in NO1, where electricity consumption consists largely of households. This zone also has substantial interconnection capacity with Sweden, making it likely that Sweden — and more specifically the SE3 bidding zone — experiences higher winter electricity prices as a direct result of the Norway Price scheme.

[5] https://elhub.no/data-og-innsikt/datakatalog

[6] https://elhub.no/data-og-innsikt/statistikk-for-norgespris

Appendix 1. Tables of data used in figures

Tables of Data Used in Figure 1 (GWh)

	August	September	October	November	December	January	February
Industry	434.0	433.0	523.7	537.5	543.1	669.0	627.8
Services	690.2	729.7	800.9	952.9	1008.7	1224.2	1112.0
Primary industries	21.6	25.1	34.7	36.4	38.9	50.3	48.4
Households	762.6	873.1	1212.0	1581.7	1771.8	2340.9	2119.8
Holiday homes	32.8	36.2	54.8	76.7	98.5	133.1	125.4

Tables of Data Used in Figure 2 (GWh)

	August	September	October	November	December	January	February
Industry	1713.9	1655.8	1688.5	1624.3	1700.8	1750.1	1598.6
Services	345.7	368.1	431.0	491.9	519.8	650.5	583.9
Primary industries	53.9	56.4	61.8	63.4	67.9	78.2	74.0
Households	458.2	521.0	711.5	903.4	1035.9	1352.4	1196.7
Holiday homes	31.3	30.2	43.5	57.6	69.0	105.1	94.4

Tables of Data Used in Figure 3 (GWh)

	August	September	October	November	December	January	February
Industry	868.4	672.4	827.1	820.5	858.7	883.7	784.2
Services	166.6	173.8	205.1	234.6	244.9	302.7	257.2
Primary industries	8.3	9.0	10.0	11.2	12.0	14.4	13.8
Households	194.9	220.7	292.3	366.8	397.6	527.3	448.5
Holiday homes	16.0	18.5	27.6	36.4	46.5	63.2	56.5

***