



EFTA Surveillance Authority
Avenue des Arts 19 H
1000 Brussels Brussels
BELGIUM

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Norway Price for Electricity. The Ministry's responses to ESA's request for additional information

1. Introduction

The Ministry refers to the letter from the EFTA Surveillance Authority (ESA) of 20 March 2026, case no. 94452, and appreciate the opportunity to provide further comments and clarifications as well as response to new claims put forward by the complainants in their letter to ESA dated 22 April 2026. The Ministry will in the following seek to provide an overall, general response to the questions and will comment in further detail on the complainant's arguments.

As for the latter, the Ministry cannot see that the letter from the complainants brings forward any new information suited to alter the Ministry's assessment of the Norway Price scheme as presented in its letter to ESA of 15 December 2025. Since the Ministry's last response we have seen an increased electricity price in Norway, inter alia as a result of increased electricity prices in the rest of Europe in combination with a dry and cold winter in Norway. We are now, once more, in an unstable energy situation with the Iran conflict and the closing of the Strait of Hormuz. The situation affects global and regional energy markets, also in Europe and the Nordics, and have the potential to affect further price developments through the rest of 2026.

This is an illustration of how Norwegian electricity prices are still to a large extent exposed to external shocks, and the need to protect Norwegian households from volatile and often high electricity prices through schemes such as the electricity support and Norway Price.

At the same time, Norway is in a situation with significantly higher interest rates than other Nordic and European countries, and where an expected rate reduction has been postponed indefinitely. This affects household behavior and their interest in investing in different types of heating technologies and measures.

Referring to the questions and the remark from the complainants regarding substitution, it is therefore important to distinguish between discussing the markets for and the consumption of different energy goods, versus assessing the markets for and investments in various heating technologies, energy-efficient solutions, etc. These are different markets with different characteristics. The latter is influenced by far more factors than the ongoing consumption of energy goods, such as interest rate developments, cost developments in the technologies, housing conditions, and the rate of renovation, etc. These are conditions that have changed significantly in recent years, both in Norway and in other countries. This distinction is not always clearly reflected when substitution is discussed.

The impression left by the complainants is that energy efficiency is being deprioritized. It should be pointed out that in the year when the Norway Price scheme was introduced, efforts to improve energy efficiency targeting households were also intensified (new measures from Enova, etc.), and that there is a large number of schemes, support programs, and regulations that supports continued progress in energy efficiency going forward in Norway, including in households. Nevertheless, it is not unnatural that the general economic situation will affect the development over different periods in time.

The Norway price scheme runs until 2029. Over this period, it is highly likely that there will be phases in which household consumption both increases and decreases, depending on factors such as the economic situation, temperatures, demographics, developments in electric vehicle adoption, and more.

Consumption data for households are now available for the period during which the Norway Price scheme has been in effect. The Ministry cautions against drawing premature conclusions about the causes of variations in household consumption based on a relatively short time frame and without adjusting for the significant differences between households.

The Ministry has reviewed the data across different household categories and finds no basis for asserting a causal relationship between the Norway Price scheme and variations in consumption. In short, the Ministry maintains the view that the Norway Price scheme will have very limited effects on household electricity consumption and wholesale electricity prices and have no traceable effect on electricity trade or prices in other Nordic countries. The Ministry will elaborate on this in the answer to question 19.

By way of summary, as regards the legal analysis, the Ministry's position on the questions concerning the reference framework, selectivity and the alleged indirect advantage to electricity producers is as follows:

The Ministry considers that the relevant reference framework for the selectivity assessment is the statutory framework governing the Norway Price schemes for electricity and district heating, rather than Act No. 44 June 20, 2025 on Norway Price and electricity support for households ("the Norway Price Act") as a whole. While the two schemes are related, they do not pursue identical objectives and they operate through distinct legal and economic mechanisms.

The Ministry further considers the application of the three-step selectivity test appropriate in the present case. The alleged beneficiaries are neither expressly identified nor directly targeted by the scheme, and any advantage to electricity producers would, at most, constitute an indirect and secondary effect of a general household support scheme. Selectivity must therefore be assessed by determining whether the scheme favours a sufficiently identifiable category of undertakings over others which are in a comparable factual and legal situation.

That assessment cannot be replaced by a general reference to sectoral effects. Such effects are not sufficient, in themselves, to establish selectivity, including where the alleged advantage is indirect. The assessment must distinguish between a genuine indirect advantage and ordinary secondary economic effects. This requires more than showing that a measure may have positive effects for a particular sector, particularly when said effects are likely to be insignificant.

Finally, the Ministry submit that the Norway Price scheme is not designed to stimulate electricity consumption or to subsidise such consumption as such. Rather, it is intended to provide households with security and predictability in respect of essential electricity use during periods of volatile and high prices. Any alleged indirect advantage to electricity producers cannot be presumed, but must be established on the basis of concrete, significant and foreseeable effects. Hypothetical, incidental or insignificant effects are insufficient to demonstrate the existence of an advantage within the meaning of Article 61(1) EEA.

2. The Norwegian electricity market and features of the Norway Price Act

2.1 Question 1

“Please provide an overview of the development of the Norwegian electricity market for households from the late 1980s until today, including the liberalisation of the Norwegian electricity market, developments in the markets for electricity and the types of electricity supply contracts used by Norwegian households, the introduction of power exchanges and price zones, implementation of national energy efficiency measures and the main differences between the electricity market in the period 1993-1995 and today.

a. In this context, please provide describe the standard variable household tariff called H4 tariff, which ESA understands was in use in the years after the liberalisation.”

2.1.1 The liberalisation of the electricity market in Norway

In the 1990s, Norway liberalised its electricity market through reforms that introduced competition in power generation and trade, while keeping transmission and distribution as regulated monopolies. The introduction of the Energy Act of 1990 represented a shift from a

politically and administratively determined pricing system, where prices were set annually on a cost-based basis¹, to a market-based system for power trading.

In the years following the implementation of the Energy Act, several institutional and regulatory measures were introduced to ensure effective competition and maintain appropriate regulation of natural monopoly grid activities. One key reform was the split of Statkraft, which led to the establishment of Statnett as the owner and operator of the national transmission grid, while Statkraft remained the owner and operator of state-owned power plants.

In addition, a point tariff system replaced distance-based tariffs to ensure non-discriminatory access to the grid. The Norwegian Water Resources and Energy Directorate (NVE) was given responsibility for regulating grid monopolies. At the same time, a transparent marketplace for power price formation was established. A milestone was the creation of the power exchange Statnett Marked in 1993, later known as Nord Pool. The exchange initially included a spot (day-ahead) market with hourly price formation, and future-contracts.

In the early 1990s, households typically had fixed price or variable price electricity contracts. Under variable price contracts, prices were adjusted regularly in line with developments in the wholesale market. At this point in time, it was difficult and costly to switch supplier, so most households remained on their existing contracts. A key milestone came in 1997, when Norwegian households were granted the right to switch electricity supplier free of charge. This strengthened consumer choice and improved competition in the retail market. Norway was among the first countries to introduce competition in the retail market for electricity.

Although many households initially remained on their existing electricity contracts in the early 1990s, an increasing share of households gradually started to switch suppliers. Over time, a growing number of households opted for contracts linked to spot prices. Fixed price contracts remained available but became less common.

A further development in the electricity retail market was the rollout of smart meters (AMS), which are installed in nearly all Norwegian households today. The roll-out started in 2011 and was completed in 2019. The smart meters provide accurate measurement and settlement of electricity consumption and ensure that customers are billed based on actual electricity consumption, thereby making households on spot price contracts directly exposed to hourly spot prices.²

Compared to several other European countries, Norway has a high uptake of smart meters. As of 2022, 98.8 percent of all metering points in the low-voltage distribution grid in Norway had a smart meter (RME, 2023). In contrast, Germany had smart meter uptakes below 10 percent in 2025 (ACER, 2025).

¹ The local utilities, mainly owned by the municipalities, distributed electricity to the customers and suggested end user prices based on their cost of electricity production, electricity purchase and transport. The local governments sanctioned the suggested price, aiming to avoid deficit.

² Previously, customers' consumption profiles were predicted based on the aggregated consumption profile in the area. Based on the aggregated profile, electricity suppliers allocated each household's total electricity consumption over a period (typically a month), across each hour. Customers were then billed according to the spot price applicable for each respective hour.

In the last 15 years, Norwegian households have generally chosen spot price contracts over fixed-price and variable price contracts. This is largely due to the fact that spot price contracts have proven to be competitive for most households over time. By 2025, 97 percent of household electricity consumption was covered by spot price contracts (Statistics Norway, 2026). The share of household electricity consumption covered by fixed price and variable price contracts is now almost negligible. In 2025, only 1.2 percent of households had fixed price contracts, while 1.6 percent had variable price contracts (Statistics Norway, 2026). In contrast, a significant share of EU households, 59 percent on average and up to 100 percent in some member states, remain on regulated or fixed price contracts (ACER, 2025).

The low uptake of fixed-price contracts may also be due to a lack of supply. The fundamental explanation for Norway's low supply of fixed-price contracts is that low liquidity in the financial power market makes it challenging for electricity suppliers to offer fixed-price contracts on competitive terms. Low liquidity in the financial electricity markets is a structural challenge in the Nordic power market. The situation has been reinforced by high and increasing price volatility in the latter years, making it difficult for electricity suppliers to hedge their electricity volumes in advance and thereby offer competitive variable and fixed-price contracts to households. In 2024, the Norwegian Energy Regulatory Authority (RME) concluded: *"The products and the combination of products offered in the forward markets today do not provide effective hedging possibilities against the volatility of the day-ahead price in Norwegian bidding zones."* (RME, 2024). For more information on this issue, the Ministry refers to The Electricity Price Committee's report (Strømprisutvalget, 2023), and section 2.3.3 in its reply to ESA regarding the state aid complaint concerning Norway Price, submitted on 15 December 2025.

2.1.2 The introduction of bidding zones in Norway

The use of bidding zones is in line with the guideline on Capacity Allocation and Congestion Management regulation (CACM³) which states that *"Bidding zones reflecting supply and demand distribution are a cornerstone of market-based electricity trading and are a prerequisite for reaching the full potential of capacity allocation methods including the flow based method. Bidding zones therefore should be defined in a manner to ensure efficient congestion management and overall market efficiency."*

The Norwegian regulation on system operation ("Forskrift om systemansvaret i kraftsystemet") states that Statnett shall use bidding zones to handle large and long-term bottlenecks in the transmission grid. The use of bidding zones supports efficient balancing of regional markets and allows prices to diverge across areas separated by transmission bottlenecks.

Norway was among the first countries to introduce bidding zones. In 2001, Statnett established two separate bidding zones in Norway. Since then, the number of bidding zones has varied. From 2010 and until today, Norway has been divided into five bidding zones. Statnett regularly assesses whether the bidding zone configuration adequately manages structural bottlenecks in the grid and contributes to the efficient functioning of the power system, and is currently assessing the potential consequences of a division of bidding zone NO4. The use of bidding zones places Norway in a distinctive position compared to most

³ Commission Regulation (EU) 2015/1222 of 24 July 2015 establishing a guideline on capacity allocation and congestion management.

other European countries, which continue to operate with a single national bidding zone and rely more heavily on countertrade to manage internal congestion.⁴

In the years following 2010, price differences between bidding zones remained relatively modest. However, in recent years the market conditions in Norway and the Nordic region have been increasingly influenced by the situation in the European market. From the second half of 2021, through 2022 and into 2023, a new situation arose with significant price differences between the southern and the northern parts of Norway. The great regional differences quickly became a difficult political issue and have also been perceived as unreasonable by the public. There are significant price differences between Norwegian bidding zones, as illustrated in Figure 1 and Figure 2. As a result, there are considerable differences in electricity costs for households in Northern and Southern Norway, see Figure 3. For more information on the developments in the electricity market, the Ministry refers to section 2.2 in its reply to ESA regarding the state aid complaint concerning Norway Price, submitted on 15 December 2025.

The price differences that emerged in 2021-2022 coincided with an expansion of Norway's interconnector capacity. In 2020 and 2021, two new subsea cables to Germany and the United Kingdom were commissioned, increasing total interconnector capacity in Norway by nearly 50 percent. Cross border electricity trade is an important part of well-functioning markets. However, to reap the benefits of trade the price signals need to be correct. Analysis show that a division of Germany's single bidding zone could reduce prices in northern Germany and, through market coupling, also in the Nordics including southern Norway, though to a lesser extent (Nordic Energy Research, 2026).

Factors outside of Norwegian authorities' control, such as higher shares of intermittent power production in Europe, and a limited number of bidding zones in countries such as Germany, are expected to remain a strong influence on Norwegian whole-sale prices and thus households' electricity expenses. Statnett has pointed out that Germany maintains a single bidding zone despite a structural north-south grid constraint. According to Statnett, several studies have pointed to the challenges this creates in Germany, as well as the challenges it creates for neighbouring countries. Statnett also states that potential overloads in Germany are handled through redispatch measures, which in 2023 amounted to costs of up to approximately NOK 30 billion (Statnett, 2025). One important factor outside of Norwegian authorities' control is the continued role of gas-fired power generation in European price formation, especially in hours when demand is high or wind and solar production is low. In such periods, higher gas prices often increase European power prices and thereby also influence Norwegian prices through interconnectors and Norwegian water values⁵. Geopolitical events, such as the current situation in the Middle East, shows that gas and energy prices, and in extension Norwegian wholesale prices for electricity, is affected by global supply and geopolitical uncertainty outside the control of Norwegian authorities.

⁴ Only four European countries have more than one bidding zone – Norway, Sweden, Denmark and Italy (ENTSO-E, 2025).

⁵ Water values refer to the opportunity cost of dispatchable hydropower.

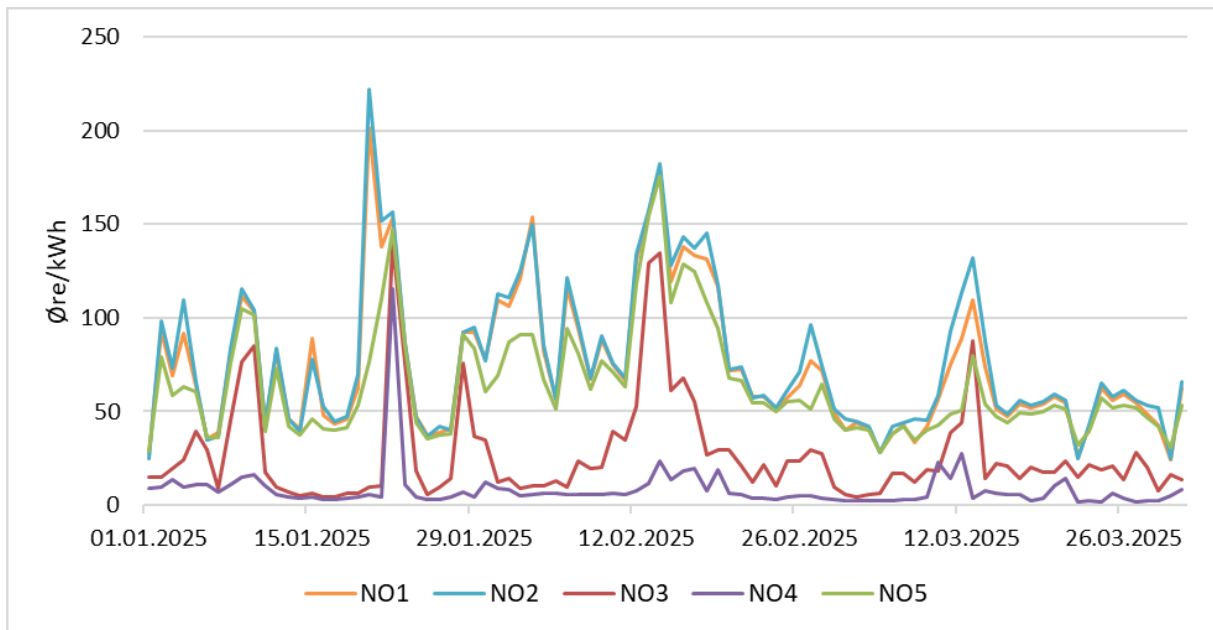


Figure 1: Electricity prices in bidding zones NO1, NO2, NO3, NO4, and NO5 in Q1 2025. Øre per kWh. Source: Nord Pool.

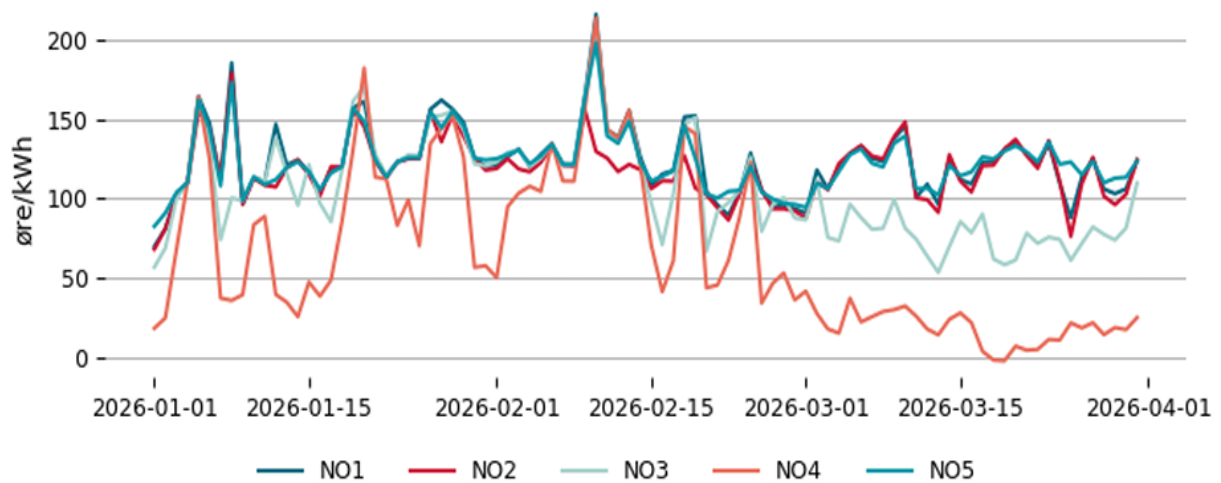


Figure 2: Electricity prices in bidding zones NO1, NO2, NO3, NO4, and NO5 in Q1 2026. Øre per kWh. Source: NVE.

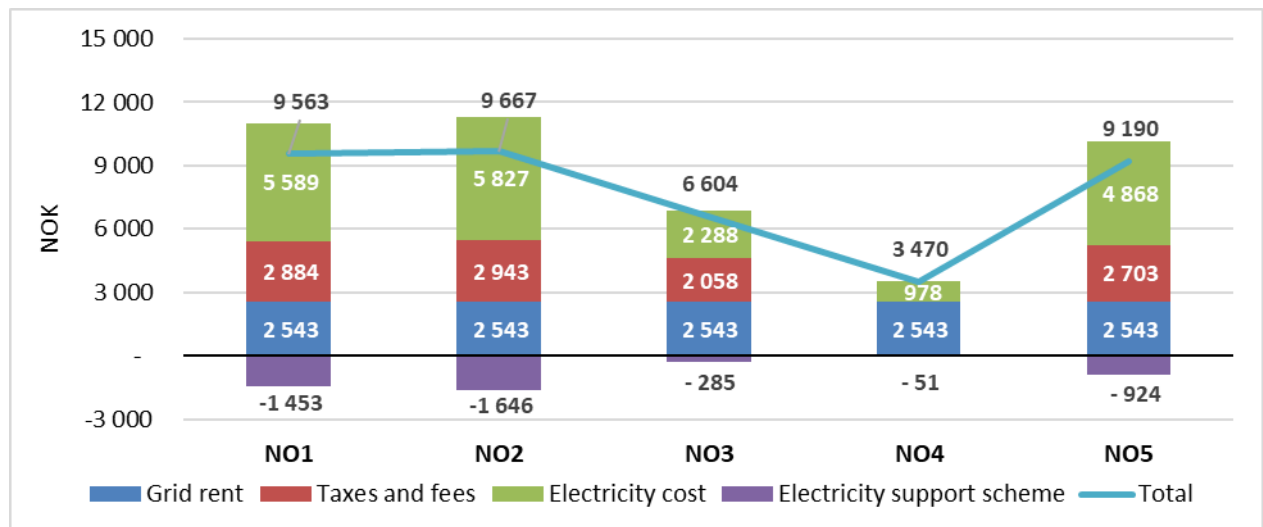


Figure 3: Estimated total electricity costs in Q1 2025 for a household customer with an hourly spot price agreement and an annual consumption of 20,000 kWh, broken down by bidding zone. The electricity cost includes the cost of electricity, grid tariffs, taxes, and electricity support. Households in large parts of NO4 are exempt from VAT and electricity tax. Source: NVE (2025a).

2.1.3 National energy efficiency measures

Energy efficiency has a long-standing tradition in Norwegian energy policy. Several measures and policy instruments aimed at improving energy efficiency and flexibility are in place. Energy efficiency has been high on the Norwegian Government's agenda in recent years. An energy efficiency action plan was launched in 2023 (Regjeringen, 2023). The action plan introduced several new measures aimed at strengthening energy efficiency efforts across different sectors. In the action plan, the Government also announced that a number of existing measures would be adjusted and further developed in order to improve their effectiveness and better address barriers to energy efficiency.

The following sections provide an overview of Norway's energy efficiency policy. While Norway has a broad range of measures and policy instruments aimed at improving energy efficiency across the economy, this report focuses on those that are relevant to households.

Regulatory measures

Regulatory requirements are a key driver of energy efficiency in Norwegian buildings.

The Norwegian Building Regulations (TEK) establish mandatory energy performance standards for buildings. These requirements were first introduced in 1949 and have been progressively tightened over time, particularly between 1997 and 2017. They apply both to new buildings and to existing buildings undergoing significant renovations or upgrades. Today, the energy performance requirements set out in TEK are among the most stringent in Europe (SINTEF, 2025).

Electricity consumption in buildings has been declining in the last years and is expected to continue declining in the coming years (NVE, 2025b). The gradual replacement of older, less efficient buildings with more energy-efficient ones, as well as the increasing uptake of

energy-efficient electrical appliances plays a big role. In this context, Ecodesign requirements—setting minimum energy performance standards for products—have proven to be an effective instrument for reducing household energy consumption.

Furthermore, an obligation to provide energy performance certificates for buildings offered for sale or lease was introduced in Norway in 2010, with the goal of increasing awareness of energy usage and energy efficiency in buildings. The energy performance certificates are also used by the financial sector as a basis for issuing green loans. Many banks now offer green mortgages for energy-efficient buildings, helping to make the financial benefits of energy efficiency investments more visible.

The energy performance certificate scheme for buildings has recently been improved to better reflect the characteristics and upgrade potential of existing buildings. This is where the largest energy savings can often be achieved. The revised scheme entered into force on 1 January 2026 and is expected to complement other policy instruments, such as Enova's programs and the EU Taxonomy framework (Regjeringen, 2025).

Informational measures

Norway has a wide range of informational measures aimed at improving transparency and access to information regarding energy use, energy efficiency, and the relevant economic and regulatory frameworks. These measures aim to reduce information barriers, increase awareness and knowledge related to energy efficiency measures.

Enova provides extensive information on energy efficiency measures, energy advice, and support schemes. Through Enova's support schemes for households, homeowners are also guided on which measures are most relevant based on the building's construction period and technical standard. In addition, Enova operates "Enova Answers" ("Enova Svarer"), a nationwide advisory service available by phone, chat, and e-mail.

The Norwegian Building Authority (DiBK) provides extensive guidance on the building regulations and energy requirements for buildings (TEK). DiBK also offers practical guidance on energy efficiency measures, the use of qualified professionals, and renovation advice through the website "Smartere oppussing" (Direktoratet for byggkvalitet, 2026). For older and heritage buildings, The Directorate for Cultural Heritage provides guidance on how energy efficiency measures can be implemented while preserving cultural and historical values (Riksantikvaren, 2026).

In addition, there are several market-based initiatives and digital "one-stop shops" that guide homeowners through the process of improving the energy performance of their homes. Examples include "Energiportalen" (Energiportalen, 2026) and "Gadder" (Gadder, 2026), which provide tailored advice on relevant energy measures, facilitate contact with suppliers, and provide information about financing opportunities through green finance solutions.

A high uptake of smart meters enables individual measurement of electricity consumption and consumption-based billing. Elhub is a Norwegian national platform for the exchange of smart meter data between participants in the retail electricity market for billing purposes. Electricity consumption data collected and stored by Elhub enables DSOs, electricity suppliers and other service providers to provide households with detailed information on their electricity consumption data for each metering point. Access to such information increases consumers' awareness of their electricity use and helps them identify opportunities to reduce

electricity consumption and/or peak demand by shifting or smoothing their electricity demand over time (Elhub, 2026).

Financial Measures

Enova

Financial support for energy efficiency measures is a long-standing policy. A central element is the establishment of Enova in 2001, which took over the responsibility for then existing grant schemes from NVE. Enova was established as a state-owned enterprise. The main goal at the time of establishment was to stimulate energy efficiency, reduce the use of electricity for heating, as well as to promote wind power development. Since Enova was established, Enova has provided financial support to ia. homeowners, for their investments in technologies such as heat pumps, solar power, bioenergy solutions, improved insulation and smart energy management systems. Over time, the support given through Enova has contributed to market development and increased adoption of energy-efficient solutions by helping new technologies become mature and commercially viable. In the period 2007–2025, Enova provided NOK 6 billion (adjusted to 2025 prices) in funding to around 220 000 energy-related household projects, see Figure 4. In the same period, Enova also provided funding for energy measures and energy efficiency improvements in non-residential buildings as well as in industry and transport.

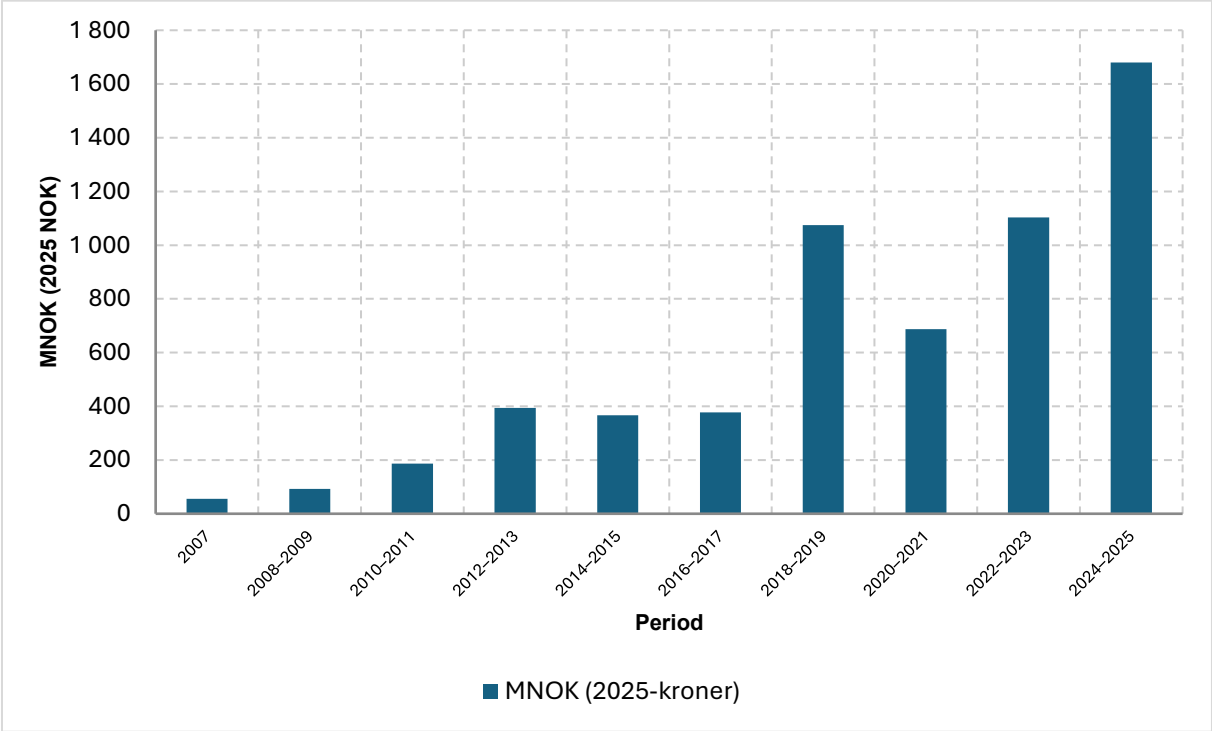


Figure 4: The figure shows the development in Enova’s support for energy efficiency measures (including solar and bio energy) in households over the period 2007–2025. Amounts are expressed in million NOK, adjusted to 2025 prices. Source: Enova.

Enova’s mandate is laid down in four-year mandates. The mandate has evolved over time, and its objective for the period 2025 to 2028 is to accelerate the development of climate and energy solutions that reduce greenhouse gas emissions while contributing to an efficient energy system, strengthening the power and capacity balance, and enabling an effective climate and energy transition through increased innovation. In Enova’s mandate for the period 2025–2028, energy efficiency has been given increased priority compared to the previous four-year mandates. Under the mandate, Enova has been assigned a specific mandate to provide financial support for energy measures in households. The support can also be used for investments in well-known and mature technologies and solutions. During the mandate period, the government will allocate at least NOK 587 million annually to Enova under this mandate. In 2025, NOK 887 million was allocated by the government to the scheme, while NOK 610 million has been allocated by the government in 2026.

To follow up on its specific mandate to provide financial support for energy measures in households, Enova launched a new support scheme in August 2025, providing funding for 15 different energy-related measures aimed at households (Enova, 2025). The measures and the support rate are listed in Table 1 below. The scheme introduced support for several new measures, while a number of existing programs received updated and higher support rates. The new scheme has enabled more homeowners to receive Enova support when carrying out energy upgrades in their homes.

In addition, Enova provides investment support to housing cooperatives that carry out energy efficiency upgrades in their building stock (Enova, 2026b). Eligible measures under the scheme for housing cooperatives include insulation, window replacement, heat recovery, improvements to ventilation and lighting systems, and local renewable energy production. Enova can cover up to 25 per cent of approved documented costs, limited to a maximum of NOK 10 million per project. The support is awarded through a competitive application process.

Table 1. The table provides an overview of the 15 energy efficiency measures aimed at households, as well as the program for housing cooperatives, and the corresponding maximum support rates. Source: Enova (2026a, 2026b).

Measure	Support rate (25 percent of cost, capped at):
Accumulator tank	NOK 5,000
Balanced ventilation system	NOK 15,000
Biomass boiler	NOK 40,000
Biomass stove with water jacket	NOK 20,000
Energy-efficient windows and exterior doors	NOK 400 per m ² up to 50 m ²
Energy advisory service	NOK 5,000
Additional insulation of roof/attic	NOK 150 per m ² up to 150 m ²
Additional insulation of walls	NOK 150 per m ² up to 250 m ²
Air-to-water heat pump	NOK 20,000
Price- and power-controlled energy storage system	NOK 10,000
Smart hot water heater	NOK 4,000

Solar PV system	NOK 2,500 per kW installed capacity up to 15 kW
Solar thermal collector system	NOK 400 per m ² up to 25 m ²
Heat pump water heater	NOK 5,000
Liquid-to-water heat pump	NOK 40,000
investment support to housing cooperatives (multiple energy efficiency measures)	NOK 10,000,000 per project

Over time, Enova has contributed to the development and maturation of markets for energy efficiency measures in households. A recurring pattern has been that Enova's support schemes initially reduce barriers related to cost, competence and risk, before technologies and solutions gradually reach commercial maturity and become viable without public support. Enova has supported the introduction and deployment of a range of technologies in households, including heat pumps, energy management systems and energy storage solutions.

The development of the air-to-air heat pump market illustrates this process well. Early support contributed to increased deployment and market maturity. Over time, this has contributed to making technologies such as air-to-air heat pumps an established and commercially viable standard in many households. NVE estimates that around 1.3 million heat pumps are installed in Norway to date, mainly air-to-air heat pumps in households (Energifakta Norge, 2025). The European Heat Pump Association (EHPA) operates with a higher number and reports up to 1.7 million heat pumps, giving the highest penetration in Europe, at 632 heat pumps per 1,000 households (European Heat Pump Association, 2025). Due to the high degree of market adoption and profitability, Enova does not offer financial support for installation of air-to-air heat pumps today. However, Enova provides financial support to households investing in air-to-water heat pumps and liquid-to-water heat pumps (Enova, 2026a).

Enova's support schemes have also contributed to the development of new service markets, including energy advisory services. From an initial situation with relatively few actors, this has evolved into a broad market with a large number of advisers, improving household access to knowledge on energy efficiency measures.

Within emerging areas such as smart energy management, energy storage and flexibility solutions, Enova has contributed to the testing and demonstration of technologies in early development phases. Several of these technologies are now approaching market maturity and are becoming increasingly available to households.

In some cases, Enova's efforts to reduce market- and technology barriers pave the way for new regulations. For example, their schemes on passive houses in 2012 and the following years contributed to strengthened competence in the building industry to cope with the more ambitious building codes in 2016 and 2017.

Support schemes from the Norwegian State Housing Bank and municipalities

In 2023, the Government established a grant scheme to support energy efficiency measures in municipally owned nursing homes, rental housing and assisted living facilities. The scheme is administered by the Norwegian State Housing Bank. In the period 2023–2026, the Government allocated NOK 1,091 million to the scheme. Municipalities may receive support for measures such as insulation, window replacement, heat pumps, solar thermal collectors, solar PV systems and biofuel boilers. The grant may cover up to 50 per cent of the actual costs of the measures, with a maximum grant of NOK 5 million per project.

There are also local financial support schemes for residential energy efficiency measures, for example in the municipalities of Oslo and Stavanger (Oslo kommune, 2026; Stavanger kommune, 2026).

Measures for solar power

The Government has implemented a number of measures to stimulate increased development of solar power in Norway. In spring 2024, the Government presented a dedicated action plan for solar power, and key policy instruments have been strengthened, including through increased investment support from Enova and the Norwegian State Housing Bank. In the period 2022–2025, Enova provided approximately NOK 500 million in support for the installation of solar PV systems in both residential and non-residential buildings. In addition, the Norwegian State Housing Bank provided more than NOK 150 million in the period 2024–2025 for solar PV systems in municipally owned rental housing, assisted living facilities and nursing homes. Enova further estimates that around NOK 400 million was awarded for solar PV systems through the energy grant scheme for businesses in autumn 2022. Taken together, this means that the Government has provided more than NOK 1,000 million in support for the installation of solar PV systems in the period 2022–2025.

The Government has also implemented several regulatory changes to better facilitate increased development of solar power. In autumn 2023, a sharing scheme for renewable electricity was introduced for customers on the same property, and from 1 January 2026 a corresponding scheme adapted to commercial and industrial areas entered into force. These schemes help improve profitability through exemptions from grid tariffs and electricity tax. In 2024, rules were introduced allowing households to sell self-produced electricity tax-free for income of up to NOK 15,000 per year, which covers the production of most households. It has also been decided that building projects in central government shall include local renewable energy production where this is profitable.

2.1.4 The main differences in the electricity markets between 1993–1995 and 2026

Table 2 compares key features of the Norwegian electricity market in the early phase of the liberalisation (1993–1995) with the key features of the present electricity market. It highlights how market design, metering technology, cross-border integration, and policy instruments have evolved.

Table 2: Main differences in the electricity markets between 1993-1995 and 2026.

	1993–1995	Today
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Wholesale market institution	Hourly spot prices were introduced with the establishment of the wholesale market; Statnett Marked (1993).	Nord Pool is the power exchange for physical electricity trading in both day-ahead and intraday markets with bidding zones. The balancing markets are operated by Statnett, who is the system operator in the Norwegian power system.
Metering systems for households	Household settlement was mostly based on load profiles and self-reporting.	Smart meters (AMS) enable individual and accurate measurement and billing of household consumption.
Supplier switching	Difficult and costly to switch suppliers.	Supplier switching is free of charge (since 1997). The introduction of the Norwegian consumer council's digital comparison tool in 2015 has made it easier for households to compare electricity contracts offered by different suppliers (The Norwegian Consumer Council, 2026).
Household electricity contracts	Households were predominantly on fixed-price or variable price contracts.	In 2025, 97 percent of household electricity consumption was covered by spot price contracts (Statistics Norway, 2026).
Bidding zones	A single national bidding zone.	Five bidding zones.
Cross-border impact on household prices	Interconnections with Nordic countries existed (approx. 4,000 MW in 1993). Before the establishment of the Nordic whole sale market, the operation of the interconnectors was based on agreements on exports and imports and balancing of the systems.	Increased market integration and greater interconnector capacity (approx. 9,000 MW) to other European countries. Domestic electricity prices in Southern Norway have become increasingly affected by European electricity prices.
Energy efficiency policy tools	Several measures, mainly information and guidance provision and some grant schemes ⁶ . Measures more decentralized.	A broader and more comprehensive policy framework with increased financial support. Measures more centralized.

2.1.5 Question 1a: A description of the household tariff in the late 1980s

The H4 tariff was a standard electricity tariff used for Norwegian households in the late 1980s up to shortly after the electricity market reform in 1991. The tariff was offered by local utilities, which were vertically integrated before the reform. The tariff featured a two-part price structure consisting of a fixed charge and an energy charge. Under the H4 tariff, electricity

⁶ The organisation of the activities in the energy efficiency field was discussed in a white paper (St.meld. nr. 41 on energy efficiency and renewable energy sources) in 1993. The policy was in a phase with several changes in the period. Many information activities had been handled by the Ministry, and this was handed over to a new dedicated enterprise OFE (Information Office of Energy Efficiency). The utilities were also obliged to inform and guide the customers. The role of NVE was strengthened, dealing with grant schemes.

prices were set administratively by the local authorities and varied considerably across the country.

In Table 3 below is an overview of average price of the energy component of the H4 household tariff, and the highest and lowest price in various counties in 1986 (Ministry of Petroleum and Energy, 1987)⁷. The regional price differences were an important justification for the deregulation of the market.

Table 3: The energy component of the H4 tariff as of January 1, 1986, county-wise averages and highest and lowest, øre/kWh (nominal prices). Source: Ministry of Petroleum and Energy (1987).

County	Average	Highest	Lowest
Finnmark	27.5	29.9	25.1
Troms	29.6	34.6	28.1
Nordland	30.9	40.3	22.1
Nord-Trøndelag	28.9	28.9	28.9
Sør-Trøndelag	28.2	35.1	22.1
Møre og Romsdal	28.9	32	23.1
Sogn og Fjordane	26.6	33.1	14.3
Hordaland	27.1	33.1	18.1
Rogaland	25.6	28.6	18.4
Vest-Agder	25.3	25.4	24.1
Aust-Agder	25.3	25.9	22.4
Telemark	23.5	30.0	17.1
Buskerud	28.0	30.9	11.5
Oppland	27.8	30.3	22.1
Hedemark	29,0	31.2	25.1
Akershus	26.7	30.9	24.4
Oslo	27.5	27.5	27.5
Østfold	24.1	30.6	20.2

In Table 4 the fixed component of the tariff, electricity consumption tax and value added tax. is included in the end-user price for households and agriculture, representing the total price of electricity in various counties in 1986.

Table 4: Average prices for households and agriculture in 1986 included the energy component in the H4 tariff, the fixed component in the tariff, electricity consumption tax and vaule added tax, øre/kWh (nominal prices). Nordland, Troms and Finnmark are exempt from the electricity consumption tax. Source: Ministry of Petroleum and Energy (1987).

County	Average	Highest	Lowest
Østfold	34.4	45.3	29.6
Akershus	35.7	43.6	31.5
Oslo	37.8	37.8	37.8
Hedemark	41.4	47.8	36.4
Oppland	38.2	46.0	32.5
Buskerud	36.2	46.2	18.0
Vestfold	36.4	45.1	28.6
Telemark	33.0	46.2	22.6
Aust-Agder	33.8	35.1	24.8
Vest-Agder	33.2	35.1	32.2

⁷ The grid costs were covered by the tariff before deregulation.

Rogaland	34.3	41.5	22.0
Hordaland	37.4	48.9	20.6
Sogn og Fjordane	36.3	42.1	21.6
Møre og Romsdal	38.8	44.1	31.2
Sør-Trøndelag	37.7	52.0	32.9
Nord-Trøndelag	36.9	36.9	36.9
Nordland	34.2	45.2	22.9
Troms	32.5	38.9	32.4
Finnmark	30.4	33.1	27.8

2.2 Question 2

“Please provide an overview of the typical features of electricity supply contracts to households in Norway. In particular:

- a. Explain how the price paid by households correlates with the spot prices determined by power exchanges.*
- b. Explain from which point in time the price paid by Norwegian households has been directly linked to the spot prices.*
- c. Explain whether households have real-time access to information regarding the spot price. Should this be the case, please explain the technology/devices used, their penetration and when they were introduced into the market.*
- d. Explain at which frequency the electricity bills are typically paid.”*

2.2.1 Question 2a

“Explain how the price paid by households correlates with the spot prices determined by power exchanges.”

The electricity price paid by Norwegian households with spot-price contracts fluctuates in line with hourly spot market prices, which are published by Nord Pool for each bidding zone. The hourly prices published by Nord Pool are based on an unweighted average of the quarter-hour prices in the day-head market, as the electricity prices in the day-ahead market are set at 15-minute intervals as of September 30, 2025. From 2012 until today, the share of household spot price contracts has been above 60 percent (Statistics Norway, 2026).

In addition to the electricity price per kWh, final electricity costs for households also include grid tariffs, supplier markups, and taxes, meaning the total cost of electricity is higher than the price paid per kWh alone.

2.2.2 Question 2b

“Explain from which point in time the price paid by Norwegian households has been directly linked to the spot prices.”

Prior to the liberalisation of the electricity market the electricity prices were administratively and politically determined.⁸ Prices were set annually on a cost-based basis in each region by

⁸ The local utilities, mainly owned by the municipalities, distributed electricity to the customers and suggested end user prices based on their cost on electricity production, electricity purchase and transport. The local governments, sanctioned the suggested price, aiming to avoid deficit.

local authorities. The pricing system resulted in significant geographic variation in electricity prices.

The introduction of the Energy Act in 1990 laid the foundation for a market-based system for power trading. During the early phase of the market reform, most households had fixed price contracts or variable price contracts.

There is no single point in time that definitively marks the transition to households being directly exposed to electricity spot prices. However, in 1997, households were granted the right to switch electricity suppliers free of charge. This increased competition in the retail market, as households could actively choose and switch their electricity contracts.

Gradually after 1997, an increasing share of households switched suppliers, and at the same time a growing number of households opted for contracts linked to spot prices. By 2025, 97 percent of household electricity consumption was covered by spot price contracts (Statistics Norway, 2026). At the same time, the share of household electricity consumption covered by fixed price contracts has gradually declined over time. The low uptake of fixed-price contracts is also attributable to limited supply. For more information on this issue, the Ministry refers to question 1, in addition to section 2.3.3 in the Ministry's reply to ESA regarding the state aid complaint concerning Norway Price, submitted on 15 December 2025.

Further, the rollout of smart meters, mandated in 2011 and largely implemented between 2015 and 2019, has enabled electricity consumption to be registered on an hourly basis and consumption data to be automatically transmitted to the DSO. This has contributed to quicker and more accurate collection of metering data and provided a more accurate basis for billing households, especially households with spot price contracts, cf. the answer to question 1.

2.2.3 Question 2c

“Explain whether households have real-time access to information regarding the spot price. Should this be the case, please explain the technology/devices used, their penetration and when they were introduced into the market.”

Information on historical, current and day-ahead spot prices is publicly available, for example on Nord Pool's website, and is free of charge.

Furthermore, households with smart meters can receive information on hourly consumption and electricity prices, as the smart meters enable two-way communication between the metering point and the DSO. Many households can access this time-of-use information through their grid company or electricity supplier via apps and online services. In many cases, households can log into their own accounts and monitor hourly spot price developments, the household's own historical electricity consumption, and in some cases price forecasts. Electricity suppliers may require an additional fee for this service.

The Ministry does not have an overview of when the above-mentioned applications and online services for households were introduced. The rollout has occurred gradually and at different points in time across providers, both suppliers and grid companies.

Furthermore, the Ministry does not have information on the prevalence of use of these applications and online services. Usage is likely to vary across households and may depend on several factors, including the ability and capacity to navigate in digital services on a regular basis. Access to information alone does not automatically translate into behavioral

adaptation. As the Ministry also argued in section 2.3.2 in the reply to ESA regarding the state aid complaint concerning Norway Price of 15 December 2025, that households face a highly complex and volatile electricity market, where manual adaptation requires significant effort, and that effective demand response is difficult in the absence of automated systems or loads. It also varies across applications to what extent they display only the development in spotprices or end-user electricity costs—that is, the power price including grid tariffs, taxes, fees, and markups. For many, the actual costs will only become available once they receive their electricity bill in the following month.

2.2.4 Question 2d

“Explain at which frequency the electricity bills are typically paid.”

Household electricity bills (electricity consumption and grid tariffs – either billed separately or jointly) in Norway are typically issued monthly, based on consumption in the previous month. While monthly billing is the standard, some variation may occur depending on the supplier or contractual arrangements.

The Ministry further notes that settlements⁹ under the Norway Price scheme are processed monthly via the grid tariff bill.

2.3 Question 3

“Please explain why have the distribution system operators (“DSO”) been charged with the administration of the Norway Price for electricity scheme on behalf of the Norwegian State.”

When the Norwegian government introduced the electricity support scheme in December 2021, the DSOs were given the responsibility for administering the scheme. The rationale was that DSOs already possess metering data, customer systems and account information for all connected households. Further, they already have systems for handling customer contact and financial settlements, and systems for supervision and control. It was therefore administratively simple and cost-efficient to use DSOs as the State’s intermediary for calculating the hourly support and settling it monthly via the grid tariff invoice, rather than building a parallel administrative system within a government agency.

In addition, the DSOs, given their role, were considered to be a neutral intermediary. A key consideration in relying on the DSOs was that this task did not alter their core role. The DSOs merely perform an additional and separate task on behalf of the State. Lastly, the Ministry assessed that settlements under the scheme reached households quickly and directly through the billing of the grid tariff, cf. Proposition 44 L (2021–2022) to the Parliament, section 3.1.

When the Norway Price scheme was later introduced, the Ministry assessed that the DSOs should also be responsible for administering this scheme. This was based on the same

⁹ “Settlements” in this context refer to financial adjustments in the grid tariff invoice, based on the difference between the electricity spot price and the reference price (Norway Price). These adjustments can result in either compensation to, or a payment obligation for, the participant, ensuring that the effective electricity price corresponds to the current level of the reference price (Norway Price).

arguments as for the electricity support scheme, in addition to that grid companies now had experience in administrating the electricity support scheme. Audits conducted had also shown that the DSOs had handled the electricity support scheme in a satisfactory manner (RME, 2025).

The Ministry refers to section 2.4 in the Ministry's reply to ESA regarding the state aid complaint concerning Norway Price, submitted on 15 December 2025, for a further description of the DSOs role in the Norway Price scheme.

2.4 Question 4

"Reference is made to the Norway Price Regulation."¹⁰

Pursuant to Article 14(1)(a) of this regulation, DSOs have an obligation to connect housing associations¹¹ with a metering point that supplies households and holiday-home consumption in the housing association's common areas, as well as shared heating and ventilation system.

According to Article 15 of the Norway Price Regulation, housing associations with shared heating and ventilation systems shall submit a report to the DSO if more than 20% of the heated area is used by others than the housing association's household units and/or holiday homes.

Under Article 17(1) of the Norway Price Regulation, the DSO that receives information pursuant to Article 15 shall make a proportionate adjustment of the price-hedging amount.¹²

2.4.1 Question 4a

"a. Please explain whether businesses located in housing associations falling within the scope of Article 14(1)(a) of the Norway Price Regulation and where less than 20% of the heated area is used by other than household and holiday homes may receive the Norway Price subsidy."

Pursuant to Article 1 of the Norway Price Act, the scheme applies solely to electricity consumption in households and holiday homes. Pursuant to Article 15 of the Norway Price Regulation, housing associations with shared heating and ventilation systems shall submit a report to the DSO if more than 20 percent of the heated area is used by others than the housing association's household units and/or holiday homes.

However, this does not imply that businesses sharing a metering point with a housing association are entitled to receive settlements under the Norway Price scheme. Only households and holiday homes are eligible for the scheme, cf. Article 1 in the Act. Further, Article 14 (2) of the Regulation establishes that the housing association must ensure that settlements under the scheme are distributed to the households and holiday homes within the housing association.

¹⁰ FOR-2025-09-08-1790 ("the Norway Price Regulation")

¹¹ As defined in Article 3(b) of the Norway Price Regulation.

¹² As defined in Article 3(l) of the Norway Price Regulation.

Any settlement under the scheme received by a housing association must therefore be allocated exclusively to the association's households and/or holiday homes. RME is responsible for the supervision and control of the scheme to ensure that the scheme is not subject to misuse.

2.4.2 Question 4b

“b. If the answer to the preceding question is yes, please explain how this complies with the EEA State aid rules and the rationale behind setting the reporting obligation at 20%.”

The answer to the preceding question is no. The Ministry therefore considers the question not applicable.

2.4.3 Question 4c

“c. Please explain what areas of the housing association are included in the term “heated area” and provide an example for how one calculates whether the 20% reporting threshold in Article 15 has been exceeded for a housing association consisting of businesses and households.

i. Are common areas included, and if so, how are they included in the calculations?”

Pursuant to Article 15 of the Regulation, housing associations with shared heating and ventilation systems shall report to their DSO if more than 20 percent of the heated area is used by others than the housing association's households and/or holiday homes. In such cases, as stipulated in Article 17 (1), the DSO shall make a proportional adjustment of the settlements under the scheme.

The term “heated area” may include shared electricity consumption related to, for example, lighting, heating of common areas, and hot water connected to the housing association's metering point. A housing association may lease out parts of its property to non-households, for example cafés, and such premises may be included in the calculation of heated area. The Regulation includes several articles that are meant to ensure that all settlements under the scheme are distributed to households or holiday homes within the housing association, exclusively. Article 15 introduces a reporting obligation where more than 20 percent of the heated area is used by non-household entities. Further, under Article 17 (1), DSOs are required to proportionally adjust the settlements based on the reported information. Lastly, Article 14 (2), obliges housing associations to ensure that settlements are allocated only to households and holiday homes.

The assessment of whether the 20 percent-threshold is exceeded is based on the total heated area behind the metering point. The share is calculated by dividing the heated area used by others than the housing association's residents by the total heated area connected to the metering point.

For instance, if a housing association has a single metering point covering a total heated area of 3,000 square meters, of which 2,000 square meters are used by household residents and shared residential areas, while the remaining 1,000 square meters are used for office purposes, the association is obliged to report to the DSO that 33 percent of the heated area is used by entities other than household residents and/or holiday home

The Ministry reiterates that Article 14 (2) of the Regulation requires the housing association to ensure that settlements under the scheme are distributed only to the households and holiday homes within the association.

2.4.4 Question 4d

“d. Please explain what the DSO’s proportionate adjustment of the price hedging amount entails and how it ensures compliance with the EEA State aid rules.”

Under Article 17 (1) of the Regulation, DSOs that receive information pursuant to Article 15 shall make a proportional adjustment of the settlements under the scheme. The hearing note for the Regulation (page 7 and 25) outlines how the DSOs can make proportionate adjustments. If a housing association has submeters that document the share of electricity consumption attributable to other uses, the DSO shall make an adjustment of the price hedging amount accordingly. For example, if parts of a housing association's property are used for commercial purposes, and the submeters document that this use accounts for 30 percent of the electricity consumption, the settlements under the scheme shall be reduced by 30 percent.

Alternatively, if there is no submeter installed, the adjustment shall be based on the share of the heated area attributable to other uses. For example, if 30 percent of the housing association’s heated area is used for commercial purposes, the DSO shall reduce the price hedging amount by 30 percent.

The 20 percent threshold in Article 15 implies that no adjustment shall be made in cases where less than 20 percent of the heated area is attributed to other uses. In such cases, the housing association will continue to receive (unadjusted) settlements for electricity consumption which is to be attributed to the household and/or holiday homes in the association. As noted above, Article 14 (2) of the Regulation requires the housing association to ensure that the settlements under the scheme are distributed to the households and holiday homes within the association only, and not to any non-household entities located in the housing associations.

2.4.5 Question 4e

“e. Reference is made to page 7 in the hearing note for the Norway Price Regulation where it is stated that “metering points organised outside the housing cooperative, for example standalone garages and energy installations, will be covered”.

i. Please explain what is meant by this sentence, in particular with reference to the scope of the Norway Price for electricity scheme.”

In some housing associations, parking facilities are located in separate buildings. In cases where standalone garage buildings remain owned by, and are intended exclusively for use by, the households in the housing association, consumption within the stand-alone building is eligible for Norway Price on the same basis as consumption within parking facilities integrated into residential building.

The same applies for other energy installations exclusively for use by the residents of the housing association. Such installations can include heat pumps, electric boilers for hot water, and private water supply and wastewater system (where the property is not connected to the public water and sewer network).

- ii. *“Please explain whether common (standalone or under housing associations) garages for multiple households with a single metering point can subscribe to the Norway Price for electricity. If so, please explain how the subscription is organised in situations where these common garages include charging infrastructure provided by commercial EV charging-operators who invoice the households a fixed subscription fee for the use of the equipment and electricity to charge their vehicles. In other words, how is the support-element of the Norway Price for electricity scheme allocated to individual households in these instances, and how is the electricity consumption of third-party businesses carved out.”*

The party registered as the customer at the metering point is entitled to opt into Norway Price, provided that the criteria of the Norway Price Regulation are fulfilled.

As such, a housing association may opt into the Norway Price scheme via a commercial charging operator, provided that the electricity consumption is for household and/or holiday home use in common areas, cf. Article 4 (1) c and Article 14, cf. Article 3c of the Regulation. In such cases, the charging operator must pass the payment and/or disbursements on in full to the households and/or holiday homes in the housing association.

RME announced on 24 March 2026, that it will carry out an external audit to assess whether and how commercial third parties (as for instance charging operators, rental property companies and sole proprietorships) pass on settlements under the Norway Price scheme to household and/or holiday homes (NVE, 2026a).

2.5 Question 5 and 6

2.5.1 Question 5 and 6 a&b

“5. Reference is made to page 47 of the comments, where it is stated that “[t]he Ministry considers that the Norway Price Act, and more specifically the Norway Price scheme, constitutes the relevant reference framework for assessing any differentiation within the system” and on page 48 “[t]he relevant reference framework is therefore the Norway Price Act and the scheme itself.”

“6. Please clarify whether you consider the relevant reference framework to be (a) the Norway Price Act, including the Norway Price scheme for electricity and district heating and the electricity subsidy scheme, or (b) only the part of the Norway Price Act concerning the Norway Price for electricity and district heating.

- a. *If (b), please explain on the basis of case law why you consider the Norway Price for electricity and district heating scheme to be the relevant reference framework, e.g. why the scheme is clearly severable from the general system of the Norway Price Act.*
- b. *If (b), please also explain whether the objective of the Norway Price scheme includes, in addition to ensuring predictable electricity prices for households in a period of volatile and occasionally very high electricity prices, ensuring financial support to households due to high electricity prices.¹³”*

¹³ To this extent, ESA refers to the following statement of the Ministry of Energy on page 34 in Prop. 148 L (2024-2025) Lov om Norgespris og strømstønad: «Som strømstønadsordningen er Norgespris en statlig stønadsordning til husholdningene, og ikke en fastprisavtale i sluttbrukermarkedet.»

ESA asks whether the Norwegian authorities consider the relevant reference framework to be the Norway Price Act as a whole, including both the Norway Price scheme and the electricity subsidy scheme, or only the part of the Act concerning the Norway Price scheme for electricity and district heating.

The Ministry considers the latter approach to be the more appropriate one. The relevant reference framework is therefore the statutory framework governing the Norway Price scheme for electricity and district heating, including the provisions necessary for its operation and administration, and not the Norway Price Act as a whole.

The Ministry recalls that, according to settled case law, the determination of the reference framework must be based on an objective examination of the content, structure, interaction and concrete effects of the applicable national rules.¹⁴ Thus, the reference framework cannot be determined solely by reference to legislative technique. The mere fact that several mechanisms are contained in the same legislative act does not mean that they necessarily form part of the same reference system. Conversely, provisions cannot be artificially severed from a broader framework where, having regard to their content and logic, they form part of one coherent system. The CJEU has also emphasised that when determining the reference framework, it is not necessary to take account of the objectives (i.e., causes or aims) pursued by the legislature. This is because Article 107 TFEU defines measures of State intervention "not by reference to their causes or their aims" but "in relation to their effects".¹⁵

Applying those principles, the Ministry does not consider that the Norway Price Act in its entirety constitutes the relevant reference framework for the present assessment. Although the electricity subsidy scheme and the Norway Price scheme are contained in the same legislative act and form part of the same broader legislative context, their content, structure, interaction and concrete effects show that they are distinct mechanisms rather than elements of one single support system.

The electricity subsidy scheme operates as an automatic compensation mechanism, calculated on the basis of actual consumption and within the consumption cap of the scheme. It applies when spot prices exceed a defined threshold and provides support calculated by reference to the difference between the spot price and that threshold. The Norway Price scheme operates differently. It is a voluntary cost predictability scheme based on a reference price, under which customers may either receive or pay a price-hedging amount depending on the relationship between the spot price and the reference price. Moreover, customers participating in the Norway Price scheme lose the right to electricity subsidy for the same period. That interaction supports that the two schemes are alternative mechanisms, not cumulative elements of the same reference system.

The effects of the two mechanisms are also different. The electricity subsidy scheme reduces the financial burden of high spot prices above the relevant threshold while leaving customers exposed to the ordinary functioning of the spot-price system. The Norway Price scheme, by contrast, replaces that exposure, for participating customers, with a price-hedging mechanism based on the reference price. On that basis, the Norwegian authorities consider that the relevant reference framework is the statutory framework governing the Norway Price scheme

¹⁴ Judgement in Joined Cases C-885/19 P and C-898/19 P, *Fiat Chrysler Finance Europe v. Commission*, ECLI:EU:C:2022:859, paragraph 72. See also Case C-465/20 P, *Commission v. Ireland and Others ('Apple')*, paragraph 80.

¹⁵ Judgement in Joined Cases C-51/19 P and C-64/19 P, *World Duty Free Group SA*; ECLI:EU:C:2021:793, paragraph 65.

for electricity and district heating, including the provisions necessary for its operation and administration, and not the Norway Price Act as a whole.

Accordingly, references in the Ministry's previous comments to the "Norway Price Act" and "the scheme itself" should be understood as references to the statutory framework establishing and regulating the Norway Price scheme, including the provisions necessary for its operation and administration. They were not intended to refer to the Norway Price Act in its entirety, as the Act also contains the separate electricity subsidy scheme.

In any event, the Ministry does not consider the precise delimitation of the reference framework to be decisive in the present case. Whether the relevant reference framework is understood as the Norway Price Act as a whole, including both the Norway Price scheme and the electricity subsidy scheme, or as the statutory framework governing the Norway Price scheme only, the outcome of the selectivity assessment would be the same. In the Norwegian authorities' view, any alleged indirect advantage to electricity producers or producers and sellers of electrical heating appliances would not be selective under either approach.

2.5.2 Question 6 c i.

"c. Irrespective of (a) or (b) and considering that the Norway Price scheme encompasses district heating, please explain why other heating sources used by Norwegian households, including wood burning and geothermal, are not included under the Norway Price support scheme.

In particular, please explain:

- i. Whether there are other heating sources used by Norwegian households, including wood burning and geothermal, that are affected by volatile and high prices similar to electricity. Please provide relevant sources to support the response."*

The Norway Price scheme is designed to provide Norwegian households with security and predictability during a time of volatile and occasionally very high electricity prices. As explained in section 2.1 and 2.3 in the Ministry's reply to ESA regarding the state aid complaint concerning Norway Price submitted on 15 December 2025, Norwegian households have a high dependency on electricity for their household energy needs, and most Norwegian households are exposed to hourly electricity spot prices through their electricity supply contract.

Energy used in Norwegian households in 2024, including holiday homes, consisted of electricity (84 percent), wood and biopellets (12 percent), district heating (4 percent) and negligible amounts of LPG and natural gas (0,1 percent) (Statistics Norway, 2025a). New buildings are not allowed to install heating systems based on fossil fuels (Direktoratet for byggkvalitet, 2018), and the use of mineral-oil and kerosene for heating purposes in buildings are banned since 2020 (Miljødirektoratet, 2026). Geothermal energy, in the meaning of high-temperature water extracted and used directly for energy purposes (common in Iceland), is *not* a heating source used by Norwegian households. Ground source heat pumps, and other types of heat pumps, especially air to air heat pumps, are however widely used for heating purposes in Norwegian households. A heat pump uses electricity to extract heat from a low-temperature source, typically outdoor air, sea water or the ground. The electricity used by a heat pump is included in the Norway Price scheme. The heat extracted from the air or other

sources by a heat pump is normally not subject to payment and is therefore not subject to neither volatile nor high prices.

The price of district heating is closely related to the electricity price, both due to the competitive relationship between electricity and district heating and to the price regulation of district heating, which is linked to the cost of electric heating (cf. Section 5-5 of the Energy Act). Therefore, the Norway Price scheme for district heating was introduced simultaneously with the Norway Price scheme for electricity.

Heating sources used by Norwegian households, other than electricity (direct use and via heat pump) and district heating, is predominantly bioenergy, as shown above. Bioenergy-based heating sources are for most households a supplement to electricity, that is not subject to volatile and occasionally very high prices in the same way as electricity. The market for wood and biopellets is not a single, unified market and does not have a pricing mechanism linked to the electricity spot price, nor does it exhibit comparable short-term volatility. Bioenergy is often traded in local and regional markets, and some households have the possibility to obtain wood for free, including from their own property. Whereas electricity is a homogeneous commodity priced per kWh, bioenergy prices depend on factors such as physical volume, moisture content, and wood-type. In addition, the useful heat obtained from bioenergy depends on the heating appliance used and how it is operated. For wood-stoves, as noted by Statistics Norway (SSB), efficiency may range from 15 to 75 percent depending on the type of stove or fireplace (Statistics Norway, 2018). According to Norsk Varmer, the total efficiency of Norwegian fireplaces is around 55 percent, meaning nearly half of the Norwegian wood consumption is not transformed into useful heat (Norsk Varmer, 2026). On the other hand, equipment for electric heating and district heating will typically have an efficiency in the range of 90 to 100 percent, meaning nearly all energy purchased is transformed into useful heat. In the case of heat pumps, the efficiency will normally be in the range of 200-500 percent (Norsk varmepumpeforening, 2025). Compared to electricity and district heating, the cost of bioenergy and wood burning is therefore less comparable across households, and more dependent on factors other than the price of the energy itself.

Compared to most other countries, Norwegian households are much more dependent on electricity for heating and are also to a greater extent exposed to the electricity spot price, cf. section 2.3.1 in the Ministry's reply to ESA regarding the state aid complaint concerning Norway Price, submitted on 15 December 2025. Electric heating, including heating with heat pumps is, and has been, the dominant heating technology in Norway for years. This applies throughout the country. The use of electricity for heating is a development that took place in step with Norway's electrification, with the expansion of hydropower in the 20th century and the construction of a nationwide electricity transmission grid. Further, electricity prices in Norway are strongly influenced by the ongoing developments and fluctuations in the European electricity market, as further explained in section 2.1, 2.3.4, 3.1.5 and 3.3 in the Ministry's reply to ESA regarding the state aid complaint concerning Norway Price, submitted on 15 December 2025.

Under the mandate for the period 2025–2028, Enova has been assigned a specific mandate to provide financial support for energy measures in households. The support can be used for investments in well-known and mature technologies and solutions. During the mandate period, the government will allocate at least NOK 587 million annually to this mandate. In

2025, NOK 887 million was allocated by the government to the scheme, while NOK 610 million has been allocated by the government in 2026. To follow up on its specific mandate to provide financial support for energy measures in households, Enova launched a new support scheme in August 2025, providing funding for 15 different energy-related measures aimed at households. (Enova, 2026; Enova, 2025). Measures like biopellet boilers, bio-ovens with water jackets, air-to-water heatpumps and liquid-to-water heatpumps are included in the current scheme. According to Enova, regular clean-burning wood stoves do not need support to be in demand and are therefore not eligible for financial support under Enova's support schemes (Enova, 2026c).

In summary, electricity and electrical heating differ from other energy sources used by Norwegian households for several reasons, including their widespread use and exposure to fluctuations in the European electricity market. With the exception of district heating, other heating sources used by Norwegian households are not subject to the same volatility and occasionally high prices as electricity. Other heating sources are therefore not included in the Norway Price scheme. Investment support is however provided by Enova for a number of heating technologies other than direct electrical heating, including bioenergy-based solutions and certain heat pump technologies.

2.5.3 Question 6 c ii.

In particular, please explain:

- ii. "Whether there are other differences (technical, legal, costs etc.) between, on the one side, electricity and electrical heating appliances and, on the other side, other energy sources and associated appliances that render the two groups incomparable by reference to the objective of the Norway Price for electricity."*

As explained in the answer to question 6 c) i, district heating shares similarities with electrical heating. Accordingly, a Norway Price scheme for district heating was introduced simultaneously with, and with the same objective, as the Norway Price scheme for electricity. Apart from district heating and electricity (both direct use and via heat pump), other heating sources used by Norwegian households are predominantly based on bioenergy. In addition to the particular position of electricity in Norwegian households, and the differences in the market conditions between electricity and bioenergy as explained in the answer to question 6 c) i, bioenergy differs from electrical heating in several additional respects:

- Electricity or district heating is typically the main heating source in a household.
- Households using wood burning for heating normally use it as a supplementary source, especially during cold periods.
- Wood burning is strongly correlated with temperatures, and also dependent on temperatures and the length of winter in the preceding year, due to the possibility for storage.
- Wood burning is a more labour-intensive and less convenient heating solution, compared to electricity and district heating, as wood burning normally requires regular supervision and replenishment of fuel.
- Wood burning is often used for the purpose of creating a cozy ambiance, and heating is not necessarily the main purpose of wood burning.

- Wood stoves also serve an emergency preparedness function as a backup energy source to the main heating source, which in most cases is electricity-based heating.
- Unlike electricity, bioenergy is *not* an option for all households, as it requires a chimney, adequate space for the heating appliance, and the possibility to store wood or bioenergy. There are significant variations in which types of households that have access to wood-burning heating. Wood stoves are far more common in detached houses than, for example, apartments, where only around 13 percent have the possibility to heat with wood (Statistics Norway, 2025c). Approximately 3.6 million Norwegians live in homes with a fireplace, meaning around 2 million do not (Norsk Varme, 2023).
- Unlike electricity and district heating, wood consumption is not measured, and wood is sold regardless of the time of use.

2.6 Question 7

“Please expand on the reasons why the Norwegian authorities consider it necessary to conduct a three-step selectivity test in order to assess whether Norway Price for electricity confer a selective indirect advantage on (a) electricity producers and (b) producers and sellers of electrical heating appliances. Please support your reply with references to relevant case law and decisional practice of the European Commission and ESA.”

As a preliminary remark, the Ministry recalls that the three-step test was originally developed in the context of fiscal measures, in particular tax exemptions and other derogations from a generally applicable tax system. However, the test has since become the ordinary analytical framework for assessing material selectivity in relation to measures of general application.

This follows, in particular, from the judgment in *Flughafen Lübeck*.¹⁶ In that case, the Commission argued that the three-step test was confined to fiscal measures. The Court did not accept that approach. Rather, it assessed whether the measure at issue was selective by reference to the same underlying methodology: first, the relevant reference framework must be identified; second, it must be examined whether the measure differentiates between undertakings which, in the light of the objective of that framework, are in a comparable factual and legal situation; and third, any such differentiation must be assessed in order to determine whether it is justified by the nature or general scheme of the system.

The Ministry notes that the three-step test is generally unnecessary in cases of individual aid. In such cases, the Court has held that selectivity may be presumed. That presumption does not, however, apply to schemes or measures of general application (see answer to question 10a below).

The Norway Price scheme is not an individual measure adopted for the benefit of identified undertakings or undertakings in a specific sector. It is a general household support scheme, available on the basis of objective criteria and administered in relation to household electricity consumption. Any alleged advantage to electricity producers or to producers and sellers of electrical heating appliances would therefore be, at most, an indirect and secondary economic effect of the scheme.

¹⁶ Judgement of the Court of 21 December 2016 in Case C-524/14 P, *Commission v. Hansesstadt Lübeck*, ECLI:EU:C:2016:971, paragraph 50-56.

The fact that an alleged advantage is indirect does not dispense with the requirement of selectivity. On the contrary, where the alleged beneficiaries are not the direct recipients of the measure, the selectivity analysis becomes particularly important. It must be examined whether the scheme, by its design, structure or objective effects, favours a sufficiently identifiable category of undertakings over other undertakings which are comparable in the light of the objective of the relevant reference framework. Any alleged advantage to electricity producers or to producers and sellers of electrical heating appliances would therefore arise only indirectly, through alleged effects on demand. In those circumstances, selectivity cannot be presumed; it must be established.

Decisional practice from ESA and the Commission confirms that such indirect demand effects must be assessed through the ordinary selectivity framework. In Decision No 155/16/COL, concerning the Norwegian exemption for low-value goods imported by final consumers, ESA found that the measure could stimulate consumer demand for such goods and thereby *indirectly* favour manufacturers and dealers. ESA then stated that the next step was to assess the selective nature of those potential advantages, and proceeded to apply the three-

step test.¹⁷ This is in line with practice from the Commission: where a measure is alleged to favour undertakings other than its direct recipients, the Commission does not infer selectivity from the mere existence of an economic benefit but assesses selectivity separately by reference to the three-step methodology. This is particularly clear in cases concerning exemptions from levies or contributions used to finance support schemes, where the Commission asks separately whether any advantage to other undertakings is selective.¹⁸

Accordingly, the three-step test is necessary in the present case because the alleged beneficiaries are not individually designated and because the measure is not, by its nature, confined to a closed group of undertakings. The relevant question is therefore not merely whether electricity producers or producers and sellers of electrical heating appliances may derive some kind of economic benefit from the scheme. The decisive question is whether any such benefit is selective, in the sense that the measure differentiates between comparable undertakings by favouring those categories of undertakings in a manner attributable to the design of the scheme.

In the Ministry's view, that question cannot be answered without identifying the relevant reference framework and assessing whether the alleged beneficiaries are treated more favourably than other undertakings in a comparable factual and legal situation in the light of the objective of that framework. That is precisely the function of the three-step selectivity test.

The three-step method shows why any indirect advantage to electricity producers is not selective. If the Norway Price scheme is the relevant reference framework, the decisive question is whether, in light of that scheme's objective — household cost predictability for covered energy consumption — the measure differentiates between comparable undertakings. It does not. The scheme is neutral as to producers, suppliers and other market participants, and grants electricity producers no payment, entitlement, guarantee, exemption or preferential condition. Any possible benefit to electricity producers would therefore be merely incidental to household consumption choices under the scheme. It would not flow from a derogation from,

¹⁷ ESA Decision No 155/16/COL of 13 July 2016, *Alleged state aid arising from the Norwegian import duty exemption for low-value goods imported by final consumers (Norway)*, paras. 76–78 and 83–100.

¹⁸ See, for instance, Commission Decision C(2022) 3942 final of 8 June 2022, *State Aid SA.102454 (2022/N) – Spain and SA.102569 (2022/N) – Portugal – Production cost adjustment mechanism for the reduction of the electricity wholesale price in the Iberian market*, paras. 97–106.

or differentiation within, the relevant reference framework. The alleged advantage is thus, at most, a secondary economic effect of a general household measure, not selective treatment of electricity producers as a favoured category.

2.7 Question 8

“Reference is made to point 4.4.1 in the comments, where it is stated that “[t]he fact that a measure is sectoral is not sufficient to make a measure selective, and there is no presumption for selectivity.” Please expand on the reasons why the Norwegian authorities consider that this statement is also true in the context of indirect advantage. Please support your reply with references to relevant case law and decisional practice of the European Commission and ESA.”

In *Flughafen Lübeck*, the Court stated that the fact that a measure is sectoral is not sufficient to make the measure selective.¹⁹ The Ministry considers that this applies irrespective of whether the alleged aid is characterized as having been granted directly or indirectly.

The Ministry recalls that the conditions of Article 61 of the EEA Agreement apply in the same manner for direct and indirect aid. Such an inference finds support in long-standing case law where the Court makes no distinction between the applicability of the state aid framework for direct and indirect aid.²⁰

Sector-specific measures do not automatically meet the selectivity criterion because selectivity is a comparative concept subject to a multi-step assessment. The criterion of selectivity entails determination of a particular legal regime, and thereafter an assessment of whether the measure favours certain undertakings or the production of certain goods over others which, in the light of the objective pursued by that regime, are in a comparable factual and legal situation.²¹

The assessment implies identification of the system of reference, comparison of the benefiting undertaking and comparable undertakings in the light of the measure's objective, and, if the measure is *prima facie* selective, an assessment of whether the differentiation can be justified.²²

The same logic carries over to indirect aid, including consumer-specific measures that are claimed to lower prices and stimulate demand for particular goods or services. Applying the selectivity test differently for direct and indirect aid respectively would imply placing decisive emphasis on the formal payment route rather than the economic and legal realities.

The assessment of indirect aid is arguably more complex than the assessment of direct aid as, as an additional factor the alleged indirect advantages need to be distinguished from mere secondary economic effects that are inherent in almost all State aid measures.²³

¹⁹ Judgement of the Court of 21 December 2016 in Case C-524/14 *Commission v. Hansestadt Lübeck*, ECLI:EU:C:2016:971, paragraph 49.

²⁰ Judgement of the Court of 15 June 2010 in Case C-177/07 *Mediaset v. Commission*, EU:T:2010:233, paragraph 74-79, confirmed in Judgement of the Court of 28 July 2011 in Case C-403/10 P *Mediaset SpA v. Commission*, EU:C:2011:533 paragraph 78-82.

²¹ Judgement of the Court of 21 December 2016 in Case C-524/14 *Commission v. Hansestadt Lübeck*, ECLI:EU:C:2016:971.

²² The Commission' Notice on the notion of State aid pursuant to Art. 107 (1) TFEU paragraph 128 and cited case law.

²³ Notion of aid paragraph 116.

In case law it has been established that effects in the form of sustained demand for the beneficiary's suppliers, in the absence of obligations to obtain existing business relations, is an example of such mere secondary economic effects.²⁴ In order to distinguish such effects, a more detailed assessment than conducting whether a measure is sectoral, is required. This supports the position that, as for direct aid, finding that a measure is sectoral is not sufficient to establish a presumption of indirect aid.

2.8 Question 9

“On page 44 in the comments, it is claimed that “given that electricity is an essential good, it is likely that any savings consumers obtain through election of Norway Price will either increase household savings or be spent on goods or services in general. [...]. Several other actors – such as food producers, clothing manufacturers, and others – may also experience positive secondary economic effects from the measure” Please expand on this claim by providing sources to support the claim and concrete examples of how the listed sectors or group of undertakings may benefit from Norway Price on electricity.”

The claim referred to follows from economic theory. When the price of a good decreases (increases), the consumer's real purchasing power increases (decreases). In other words, the consumer can afford more (less) with the same nominal income. The increased budgetary room may be used in different ways: households may choose to buy more of the good that has become cheaper, or they may spend the money on other goods and services or increase savings. This is known as the income effect.

As for necessity goods (food, electricity, medicines), the consumption is affected relatively little by price changes compared with luxury goods. When the price of necessity goods increases, consumption can be reduced somewhat, but only to a limited extent, because essential needs still have to be met. For a given budget constraint, the consumer thus has two choices: either reduce consumption of other goods and services and/or reduce essential consumption to a level that may come at the expense of their welfare. This was evident during the 2021–2022 energy crisis, not only in Norway but also in other European countries.

In their 2022 report on the consequences of high electricity prices, SSB finds that there are limits to how much consumers are willing and able to reduce their consumption due to large welfare losses (Statistics Norway, 2022a). SSB observes clear signs of this, as households choose to absorb a larger share of the utility loss from increased electricity prices in the form of higher electricity expenses, thereby reducing consumption of other goods and services. Households reduce consumption where the loss of utility is lowest. When households choose to take a larger share of the welfare loss in the form of higher electricity expenses and less as a welfare loss through reduced electricity consumption, this is a clear indication that many consider their electricity use to be more important for their welfare than other marginal consumption. According to SSB, this is likely because a large share of electricity consumption for most households constitutes necessary consumption.

As a basic necessity, households will demand electricity almost regardless of price, even though some, in extreme cases, may choose to reduce their electricity consumption in ways that come at the expense of health and welfare. Therefore, when electricity prices rise, households' disposable income is generally reduced. This leads to lower savings or reduced

²⁴ Judgment of the Court of 13 May 2020 in Case T-607/17 *Volotea v. Commission*, EU:T:2020:180 paragraph 109.

consumption of other goods and services. When electricity prices fall, the level of necessary electricity consumption required to maintain welfare will not be affected, but households' disposable income will increase. This additional income can be used for savings or increased consumption of other goods and services. Hence, economic theory suggests that price changes in necessity goods primarily affect households' budgetary flexibility rather than the quantity consumed.

2.9 Question 10

“ESA understands that a household’s subscription to Norway Price for electricity requires a contract with an electricity supplier. Hence, it may be claimed that the support element under Norway Price for electricity is conditional on the purchase of electricity. As it seems to have been largely estimated²⁵ that Norway Price for electricity would reduce many households’ annual electricity bill it may furthermore be claimed that Norway Price for electricity will stimulate demand for electricity. In turn, it is claimed that electricity producers may retain their level of production or even increase it.

2.9.1 Question 10 a

“Please explain:

- a. *Why the Norwegian authorities do not consider that Norway Price for electricity has the (formal or informal) objective of reducing the cost of electricity consumption, e.g. why the scheme does not constitute a subsidy for electricity consumption.”*

Norway Price is not a fixed-price contract in the end-user market, but a government-funded scheme, where households are given the opportunity to choose between the existing electricity support scheme or to have the support settled against a reference price per kWh, the Norway Price. The Norway Price scheme runs until 31 December 2029. It will be adjusted annually, with three adjustments remaining over the period.

The objective of the Norway Price scheme is not to stimulate electricity consumption, but to ensure predictability and security for households during a time of high and volatile electricity prices. When the spot price is higher than the reference price, the state covers the difference, and when the spot price is lower than the reference price, households are required to pay the difference to the state. This is calculated hour by hour based on the difference between the spot price in the relevant bidding zone, and the reference price of (currently) NOK 0.40 per kWh, multiplied by actual consumption. The settlement is carried out in arrears, on a monthly basis. The amount the household either receives or is charged may vary substantially between different years, seasons and weeks and not least between the different bidding zones in Norway.

Effectively, the Norway Price scheme functions as a support mechanism that, within the consumption cap, provides households with predictability in the absence of liquid markets that can offer fixed-price contracts.

As Norway Price is a support scheme, calculated ex post, all households must still have an electricity supply contract.²⁶ Household total electricity costs still include grid tariffs, taxes,

²⁵ See as example: <https://www.forbrukerradet.no/strompris/norgespris>

²⁶ Under Norwegian law, DSOs are required to provide what is known as a "supplier of last resort" service to ensure that households do not lose their electricity supply for instance when moving, when their electricity supplier can no longer deliver electricity (e.g. due to bankruptcy), or when the electricity

and supplier mark-ups. Norway Price as a support scheme will therefore only provide predictability for a portion of the end-user cost of electricity, and the total end-user cost is still considered to be substantial compared to historical levels. As noted on page 14 in the Ministry's reply to ESA regarding the state aid complaint concerning Norway Price, submitted on 15 December 2025, the total electricity costs for households per kWh under the Norway Price scheme are estimated to range between 1.10 and 1.30 NOK per kWh, with some households facing even higher costs depending on their geographic location. It will therefore still be beneficial for households to economize on electricity use to avoid high costs.

Given that electricity is a basic necessity, the Ministry considers it unlikely that the Norway Price scheme will have a significant effect on electricity consumption. Household electricity consumption is largely determined by fundamental daily needs. Hence, electricity consumption is not driven by a need for the good itself, but rather serves as a means to achieve, for example, floor heating, lighting, heating of water and food, and the use of technology. As for the consumption of necessity goods (food, electricity, medicines), the consumption is affected relatively little by price changes compared with luxury goods, cf. the answer to question 9. Over time, consumption is also shaped by fundamental societal factors such as the population growth, number of people per household, building standards and developments in energy-efficient appliances—factors that individual households do not necessarily control.

Likewise, the Ministry would also like to emphasize that a moderate increase in electricity consumption over time is not unexpected. The number of households is growing, and both the average dwelling size and the number of electric cars are increasing over time. Therefore, it cannot be assumed that household consumption would not have increased in the absence of the Norway Price scheme, as the complainants assume or that any growth in this sector should be attributed to Norway price. That being said, many analyses point to the fact that energy efficiency and housing standards may well reduce households' consumption in the long run.

On that basis, the Norway Price scheme differs from measures that have the objective to subsidise consumption of certain goods. Subsidies are generally characterised by their intention to influence consumer behaviour and incentivise a particular type of consumption. The Norway Price scheme does not have the objective of incentivising increased electricity consumption in households; the scheme merely seeks to provide security and predictability for the households' ability to pay for necessary electricity use in periods with high prices.

2.9.2 Question 10 b

"Please explain:

- b. *Whether the finding of an indirect advantage to electricity producers within the meaning of Article 61(1) requires further substantiation of the effects of the Norway Price for electricity producers than what has been outlined above. E.g. must one demonstrate that the effect on electricity producers would be more than insignificant to conclude that Norway Price for electricity had the foreseeable effect,*

supplier terminates supply as a result of non-payment. In such situations, the household will automatically receive electricity from their DSO until they choose a new supplier. Households who receive electricity under the supplier of last resort obligation are automatically covered by the electricity support scheme. Households who receive electricity under the supplier of last resort scheme can also opt in to the Norway Price scheme, cf. the Act § 9 (4) and the Regulation § 23 (5).

from an ex-ante point of view, of stimulating demand for electricity. Please refer to relevant case law to support your answer.”

While maintaining the view that the Norway Price scheme will not have noticeable effects on the demand for electricity, the Ministry endorses the understanding that further substantiation of possible effects must be demonstrated to support a finding of an indirect advantage.

As explained above, the fact that Norway Price concerns households' consumption of electricity is not in itself sufficient to establish an indirect advantage for electricity producers.

A measure granted through consumers may, in principle, confer an indirect advantage to undertakings affected by the measure. However, it follows from case law that the existence of indirect aid cannot be established based on assumptions or on the basis that it cannot be ruled out that indirect state aid is granted.²⁷ The conclusion depends on the structure and foreseeable effects of the measure, not on the mere conjecture.

Such an understanding can be illustrated by *Mediaset*, where the finding of an indirect advantage rested on specific features of the measure and its identifiable effects, including the fact that the subsidy created an incentive for consumers to switch to digital terrestrial television, helped broadcasters build audience, and limited costs that those broadcasters would otherwise have had to bear.²⁸ This reflects the requirement to distinguish indirect advantages from mere secondary economic effects inherent in almost all general state aid measures.²⁹

By requiring aid to be substantiated by the foreseeable effects of the measure, case law establishes a threshold for what may properly be characterised as indirect aid. A merely hypothetical, incidental or insignificant effect on electricity producers is not sufficient. What must be shown is a concrete and significant effect on their financial position as a result of the measure.

Such an effect cannot be inferred in the present case. As explained above the Norway Price scheme may have the effect of increasing Norwegian consumers' general purchasing power which may lead consumers to increase their consumption of various goods or services according to individual preferences. As this choice is left to the free discretion of each consumer any effect on specific goods or services will likely be marginal and insignificant. Such insignificant, secondary effects do not meet the threshold required to establish the existence of indirect aid.

2.10 Question 11

“In the preparatory works (“the preparatory works”) to the Norway Price Act,³⁰ the upper consumption limit was set to 4 000 kWh per meter per month. Please explain why the consumption limit was eventually increased to 5 000 kWh per meter per month and how many percentages of Norwegian households exceeded this consumption limit in 2024.”

In Proposition 148 L (2024–2025), the Ministry proposed a consumption cap for households of 4,000 kWh for both the Norway Price scheme and the electricity support scheme. During

²⁷ Judgement of the Court of 12 September 2007 in Case T-196/02 *MTU Friedrichshafen GmbH*, ECLI:EU:T:2007:252, paragraph 46-48.

²⁸ Judgement of the Court 28 July 2011 in Case C-403/10 P, *Mediaset v. Commission*, ELCI:EU:C:2011:533, paragraph 81.

²⁹ Judgement of the Court 20 December 2023 in Case T-216/21, *Ryanair and Malta Air v. Commission*, ELCI:EU:T:2023:822, paragraph 155 and Notion of Aid paragraph 116.

³⁰ LOV-2025-06-20-44 (the Norway Price Act) and Prop. 148 L (2024-2025) Lov om Norgespris og strømstønad (legislative preparatory works).

the consideration of Proposition 148 L (2024–2025), a majority in the Norwegian parliament decided to increase the cap to 5,000 kWh per metering point per month for households under both schemes. This is the same level that has been in place in the electricity support scheme since December 2021.

As stated in the Norwegian authorities’ reply to ESA regarding the state aid complaint concerning Norway Price, submitted on 15 December 2025, individual household’s electricity consumption depends on a range of factors, including housing type, dwelling size, and the number of household members. The consumption cap of 5,000 kWh provides households with predictability and ensures to a larger extent that the consumption of most households during the winter months is covered by the scheme, including households in large and less energy-efficient homes.

Winter temperatures and the duration of the winter season in Norway can vary significantly from year to year. January and February of this year were the coldest in 16 years, leading to increased need for heating and, consequently, higher electricity consumption in many households. It is therefore not surprising that a larger share of households has reached the consumption cap these winter months compared to 2025, which was a warmer year. The Ministry notes that a higher share of households was above the cap in Q1 2024 compared to Q1 2025, as 2024 also had some periods of cold weather. See table 5, 6 and 7 below.

Since households’ necessity needs for electricity and associated costs are highest during the winter months, it has been particularly important to ensure that both the electricity support scheme and the Norway Price scheme are designed in a way that provides predictability and security regarding electricity expenses during these months.

However, it is worth noting that the data on the number of households above and below consumption thresholds do not contain information about the characteristics of these households, i.e., number of occupants, housing standards, and access to other heating technologies.

Table 5: Share of households in each bidding zone that had consumption above and below the various consumption thresholds in Q1 2024. Source: Elhub

Bidding zone	Month	< 1,000 kWh	< 2,000 kWh	< 3,000 kWh	< 4,000 kWh	< 5,000 kWh	> 5,000 kWh
NO1	January	30,0 %	58,1 %	77,7 %	89,4 %	95,1 %	4,9 %
NO1	February	37,9 %	69,4 %	87,4 %	95,3 %	98,0 %	2,0 %
NO1	March	43,2 %	75,4 %	91,4 %	97,0 %	98,7 %	1,3 %
NO2	January	21,8 %	56,7 %	81,8 %	93,8 %	97,9 %	2,1 %
NO2	February	30,7 %	70,4 %	91,5 %	97,8 %	99,2 %	0,8 %
NO2	March	34,6 %	75,3 %	94,0 %	98,6 %	99,5 %	0,5 %
NO3	January	25,1 %	60,1 %	83,8 %	94,6 %	98,1 %	1,9 %
NO3	February	30,4 %	68,1 %	89,7 %	97,1 %	98,9 %	1,1 %
NO3	March	37,0 %	76,0 %	93,9 %	98,4 %	99,3 %	0,7 %
NO4	January	15,3 %	47,3 %	73,7 %	89,5 %	96,2 %	3,8 %
NO4	February	19,2 %	55,3 %	81,5 %	94,0 %	97,9 %	2,1 %
NO4	March	22,8 %	60,9 %	85,9 %	95,9 %	98,6 %	1,4 %
NO5	January	28,9 %	63,9 %	85,4 %	94,9 %	98,1 %	1,9 %
NO5	February	35,6 %	72,9 %	91,5 %	97,5 %	99,0 %	1,0 %

NO5	March	40,7 %	78,3 %	94,3 %	98,3 %	99,3 %	0,7 %
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Table 6: Share of households in each bidding zone that had consumption above and below the various consumption thresholds in Q1 2025. Source: Elhub

Bidding zone	Month	< 1,000 kWh	< 2,000 kWh	< 3,000 kWh	< 4,000 kWh	< 5,000 kWh	> 5,000 kWh
NO1	January	34,7 %	64,9 %	83,5 %	93,2 %	97,1 %	2,9 %
NO1	February	39,7 %	71,2 %	88,6 %	95,9 %	98,3 %	1,7 %
NO1	March	46,2 %	77,8 %	92,7 %	97,5 %	98,9 %	1,1 %
NO2	January	26,7 %	64,1 %	87,3 %	96,4 %	98,8 %	1,2 %
NO2	February	32,7 %	72,5 %	92,6 %	98,2 %	99,3 %	0,7 %
NO2	March	37,5 %	77,5 %	94,9 %	98,8 %	99,5 %	0,5 %
NO3	January	27,6 %	62,9 %	85,7 %	95,5 %	98,4 %	1,6 %
NO3	February	34,7 %	72,8 %	92,2 %	97,9 %	99,2 %	0,8 %
NO3	March	35,8 %	73,7 %	92,6 %	98,0 %	99,2 %	0,8 %
NO4	January	16,7 %	50,0 %	75,9 %	90,8 %	96,7 %	3,3 %
NO4	February	23,4 %	62,1 %	86,6 %	96,2 %	98,7 %	1,3 %
NO4	March	21,1 %	58,0 %	83,3 %	94,8 %	98,2 %	1,8 %
NO5	January	30,8 %	66,5 %	87,2 %	95,8 %	98,4 %	1,6 %
NO5	February	37,8 %	75,1 %	92,7 %	97,9 %	99,1 %	0,9 %
NO5	March	41,0 %	78,0 %	94,1 %	98,3 %	99,3 %	0,7 %

Table 7: Share of households in each bidding zone that had consumption above and below the various consumption thresholds in Q1 2026. Source: Elhub

Bidding zone	Month	< 1,000 kWh	< 2,000 kWh	< 3,000 kWh	< 4,000 kWh	< 5,000 kWh	> 5,000 kWh
NO1	January	30,9 %	58,7 %	77,6 %	89,2 %	95,1 %	4,9 %
NO1	February	33,8 %	63,2 %	81,9 %	92,3 %	96,7 %	3,3 %
NO1	March	44,3 %	75,1 %	90,9 %	96,9 %	98,6 %	1,4 %
NO2	January	21,0 %	54,0 %	78,4 %	92,0 %	97,2 %	2,8 %
NO2	February	25,3 %	61,3 %	85,0 %	95,4 %	98,5 %	1,5 %
NO2	March	34,5 %	72,8 %	92,6 %	98,2 %	99,3 %	0,7 %
NO3	January	23,0 %	54,9 %	78,3 %	91,5 %	96,8 %	3,2 %
NO3	February	28,7 %	64,3 %	86,6 %	95,8 %	98,4 %	1,6 %
NO3	March	38,6 %	76,2 %	93,7 %	98,3 %	99,3 %	0,7 %
NO4	January	13,7 %	43,1 %	68,3 %	85,3 %	94,0 %	6,0 %
NO4	February	17,9 %	52,1 %	77,8 %	91,8 %	97,1 %	2,9 %
NO4	March	24,9 %	63,3 %	87,2 %	96,4 %	98,8 %	1,2 %
NO5	January	25,5 %	58,3 %	80,4 %	92,2 %	97,0 %	3,0 %
NO5	February	31,8 %	67,4 %	87,9 %	96,1 %	98,5 %	1,5 %
NO5	March	38,9 %	74,9 %	92,4 %	97,8 %	99,1 %	0,9 %

2.11 Question 12

“Please explain the methodology relied on to set the annual reference price under the Norway Price for electricity scheme pursuant to Article 8(4) of the Norway Price Act and Article 10 of the Norway Price Regulation.”

Electricity prices in Norway have in recent years varied significantly over time, become more volatile, and differed considerably between the five bidding zones. The substantial increase in price volatility means that the costs of covering households’ essential electricity needs may vary significantly on an hourly, daily, monthly and annual basis. For more information on the developments in the electricity market, the Ministry refers to section 2.2 in its reply to ESA regarding the state aid complaint concerning Norway Price, submitted on 15 December 2025.

As stated in the abovementioned reply to ESA, page 12, the reference price was set by using average historical electricity prices across the five Norwegian bidding zones together with forward prices for electricity. The Norway Price scheme runs until 31 December 2029. The reference price is to be adjusted annually and is therefore expected to be adjusted three times during the period covered by the Norway Price scheme. Future adjustments of the reference price will be based on the electricity price outlook, and shall uphold the main objective of the scheme, which is to ensure predictability and security for households during a time of high and volatile electricity prices. The level of the annual adjustment to the reference price for the Norway Price scheme will be determined as part of the national budget process, with the Government proposing the level and the Norwegian Parliament approving it.

3. Clarification regarding studies and papers relied on in the comments

3.1 Question 13

“Please provide the underlying data and computations for the figures in the comments, to the extent available. Specifically in relation to:

3.1.1 Question 13a i

“a. Figure 13 (also reported as Figure 20)

- i. Please submit the underlying data and computations relied on to produce Figure 13.”*

In the estimates of consumption, Thema and the complainants rely primarily on aggregate electricity consumption in Norwegian households and assumed price elasticities. They then calculate a potential increase in household electricity consumption in 2026 and presents further increases in 2030 based on an assumed long-term elasticity. These figures are not combined with other information on the number of households or underlying trends that influence household consumption over time, thereby do not sufficiently test how plausible this assumption is³¹. Further calculations are therefore necessary in order to assess the implications.

³¹ Thema refers to simulations with the power market model TheMA, where the estimated changes in household electricity consumption appears to be used to assess effects on the power market, including peak load and market prices. The TheMA model is a power-market model and is not, as presented in the reports, a household-level model of electricity consumption based on the number of

Hence, the purpose of Figure 13 (20) was to translate Thema's consumption estimates into *implied household-level consumption*. In other words, the figure examines how much electricity each household would, on average, have to consume for Thema's estimates regarding total household electricity consumption under the Norway Price scheme to materialise. While this can be illustrated in several ways, the Ministry considered it useful to apply official data from SSB on the number of households and historical electricity consumption per household, in order to compare the implied consumption level with the historical pattern.

- For Figure 13 (20), *the historical series* is based on table 13929 from SSB, "Energy consumption in households, incl. holiday cottages, by year", specifically the series "Electricity consumption in dwellings and cottages per household (kWh)". The historical part of the figure therefore consists of *annual per-household electricity consumption* data published by SSB.
- The *temperature-corrected 2023 value* is derived from Thema's statement that annual temperature-corrected household electricity consumption in 2023 was 2.2 TWh lower than the previous average level of 40 TWh, that is 37.8 TWh. That value was converted into *kWh per household* using the number of households reported by SSB for 2023 (Thema Consulting Group, 2025, p. 9).
- For the *forward-looking series*, the figure relies on estimates for household consumption in Thema's report³². *The per-household consumption* figures were then computed by dividing Thema's estimated total household consumption 2026-2030 by the number of households reported by SSB for 2024. The 2024 household figure was used because it was the most recent available annual SSB figure in December 2025.

Thus, with the total numbers of household given by the latest statistics, the range shown illustrates *the implied average electricity consumption among households subscribing to the Norway Price scheme* at different opt-in rates (41–100 percent) that is required for total household consumption to reach Thema's 2030 estimate of 51.8 TWh (scenario "Norgespris + reduced VAT on grid tariffs") while assuming that the *remaining households* have average consumption corresponding to the scenario "Electricity support scheme".

3.1.2 Question 13a ii.

"a. Figure 13 (also reported as Figure 20)

- ii. *Please explain the decrease in households' electricity consumption shown in Figure 13 during the years 2001 to 2003.*"

Annual household electricity consumption mainly varies with heating needs driven by temperature, while the long-term trend is downward due to better building standards and more energy-efficient appliances, as described in answer 1.1.3 The decrease in household electricity consumption from 2001 to 2003 can be explained by the interplay between several different factors and events. As a starting point, the years 2001-2003 were characterized by unusually mild weather conditions, which reduced heating demand. Household electricity

households, housing standards, heating technologies or other household characteristics. See Thema, *Consequences of "Norgespris" in Norway and the Nordics*, p. 9, 18-20.

³² *Consequences of "Norgespris" in Norway and the Nordics* Nordics, including the scenarios "Market prices", "Electricity support scheme" and "Norgespris + reduced VAT on grid tariffs".

consumption was relatively normal in 2001, and it was a fairly typical weather year, but still 0.3 °C warmer than normal (Meteorologisk institutt, 2001). 2002 was markedly warmer, at 1.1 °C above normal, and was the ninth warmest year since the Norwegian Meteorological Institute began its measurements in 1866 (Meteorologisk institutt, 2002). 2003 was warmer still, at 1.3 °C above normal, making it the sixth warmest year since measurements began (Meteorologisk institutt, 2003). This supports the point made in the comments to the complaint, that household electricity consumption is closely linked to temperature, particularly because electricity is widely used for space heating in Norway.

However, the decrease in electricity consumption per household from 2001 to 2003 should also be understood in the context of the extraordinary power market situation during the winter of 2002/2003. At the end of 2002, inflows were very low in both Norway and Sweden, and reservoir levels in both countries had already been drawn down to record-low levels. See Figure 5. The authorities recognised that there could be challenges with power supply adequacy until the spring flood in May (NVE, 2003a).

The Government decided that information measures aimed at consumers should be initiated in order to improve the energy situation. NVE was to implement the measures, which were to be practical, informative and targeted, with a particular focus on areas where the power situation was most critical (Ministry of Petroleum and Energy, 2003). Enova was established in 2001, and as a part of its mandate at the time, it provided financial support, information, and advisory services to households on energy efficiency/energy saving as well as training of professionals.

Although a much smaller number of households were on spot contracts than today, significant media attention, government campaigns, and temporary subsidies for, among other things, heat pumps led to increased focus on energy saving among households. Media coverage of the strained power situation increased towards the end of 2002 and peaked in January 2003. Examples of media headlines (NVE, 2003b):

1. "Strøm-stopp... hvis du ikke sparer nå!" (Power cut... unless you save electricity now!) *Dagbladet*, 17 January 2003.
2. "Strømkrisen ikke over" (The power crisis is not over) *Teknisk Ukeblad*, 23 January 2003.
3. "Statnett mener vi må importere mer strøm" (Statnett believes we need to import more electricity) *NTB*, 30 January 2003.
4. "Strømrasjonering fortsatt aktuelt" (Electricity rationing still a possibility) *NRK Dagsrevyen*, 15 January 2003.

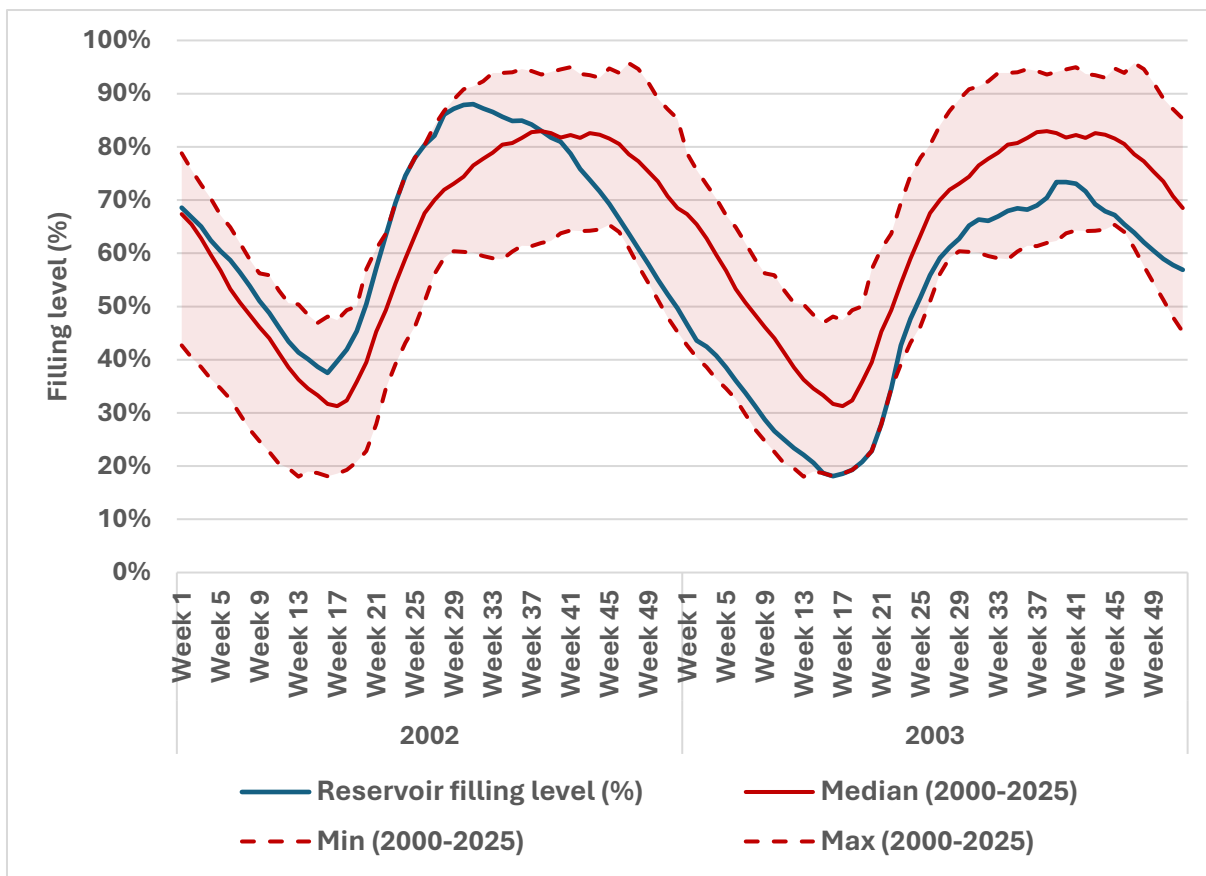


Figure 5: Reservoir filling level 2002-2003 in Norway. Source: NVE (2026c).

3.1.3 Question 13a iii.

“a. Figure 13 (also reported as Figure 20)

- iii. Please explain whether there is any correlation between the introduction of the electricity support scheme in 2021 and the increase in households’ electricity consumption shown in the graph in Figure 13 for 2022. If such correlation exists, please explain why the Norway Price for electricity scheme will not lead to an increase in electricity consumption for households similar to the electricity support scheme.”

Annual household electricity consumption in Norway did not increase, it fell from 2021 to 2022. The Ministry therefore does not consider that Figure 13 shows a positive correlation between the introduction of the electricity support scheme and increased household consumption in 2022.

Household consumption is strongly correlated with temperature. 2021 was the coldest year since 2013 (Meteorologisk institutt, 2022). 2022 however, was the 9th warmest year in Norway in the series going back to 1900 (Meteorologisk institutt, 2023). Annual household electricity consumption mainly varies with heating needs driven by temperature, while the long-term trend is downward because of better building standards and more energy-efficient appliances.

The Ministry would also like to emphasize that 2022 was an extraordinary year for Norwegian households, as for households across Europe. SSB describes 2022 as an “economic shock” for households, with unexpectedly high food, fuel and electricity prices and higher interest

rates (Statistics Norway, 2022c). These co-occurring events make it difficult to isolate the effect of the electricity support scheme itself from the other simultaneous events that can affect household behavior. 2022 was not an ordinary year and should not be used as a basis for concluding how the support scheme affects household consumption, or whether Norway Price scheme will lead to an increase. See the response to question 15 for a more detailed discussion of how the high prices and electricity scheme influenced consumption.

Media coverage of electricity prices also increased significantly. In 2022, the number of news reports on electricity prices in Norwegian media tripled (Europower, 2023). Table 8 gives context for interpreting the observed reduction in household electricity consumption in 2022. The Ministry does not rely on individual media stories or insurance warnings as quantitative evidence. However, such contemporaneous examples provide relevant context for interpreting the observed reduction in household electricity consumption in 2022. They indicate that, for some households, lower consumption was achieved through reduced indoor temperatures, restricted use of living space, or other measures involving welfare costs and material risk, not only through efficiency improvements.

This situation is further supported by the fact that, during this period, the Ministry of Energy received many thousands of letters, calls and mails from electricity customers, many pointing to their challenges in covering electricity expenses.

Table 8: Context for interpreting the observed reduction in household electricity consumption in 2022.

<p>NVE reported a significant reduction in electricity consumption in 2022 compared with 2021 and stated that consumers in Southern Norway had clearly changed behaviour during the period of high electricity prices. At the same time, NVE’s Director General stated: “Electricity saving that results from a more conscious approach to energy use is positive. More conscious and efficient energy use reduces electricity bills, reduces pressure on the power system, and helps us avoid interventions in nature. Electricity saving that reduces welfare and harms people’s health, however, is not positive.” Source: NVE (2023)</p>
<p>Insurance company “Fremtind” warned in August 2022 that very high electricity prices could lead people to reduce heating too much, increasing the risk of frost damage and burst water pipes. The company referred to figures from Finance Norway showing more than 10,000 frost damage cases in 2021, with total compensation payments of NOK 552 million, and warned that high prices could increase such risks. Source: Fremtind (2022)</p>
<p>Insurance companies also warned that some attempts to reduce electricity use could have adverse consequences. In September 2022, insurance company “If” warned that more households and cabin owners could experience frost and water damage because they were “saving electricity incorrectly”. In December 2022, “If” reported that expensive energy and failed attempts at electricity saving were already resulting in frost damage to pipes in homes and cabins, with roughly twice as many such cases as normal at that point in the winter. Sources: If (2022a, 2022b)</p>
<p>In a 2023 Red Cross survey, one respondent stated: “We freeze in the winter, and I go hungry, so my children don’t have to. There is not enough money for food and the extreme electricity prices.” Source: Red Cross (2023)</p>

Interview with a woman from Askim, who had travelled to Oslo to take part in a demonstration against high electricity prices.

The article describes how a woman carried a sign saying “Max 50 øre” on one side and “I am freezing” on the other. The woman had physically adapted her home to keep warm. She explained that she could not afford to heat her house. She had therefore closed off parts of the house using duvets, pillows and blankets, and in practice stayed only in the living room and kitchen. She said: “Now I just lie in the living room” and “I can no longer manage to live.”

Source: E24 (2022)

3.1.4 Question 13b

“Please provide the underlying data and computations for the figures in the comments, to the extent available.

b. Figure 15”

The series showing the change in annual firewood consumption in households and holiday homes per household from the previous year is based on table 13929 from SSB, “Energy consumption in households, incl. holiday cottages, by year”. The sum of the series “Fuelwood and wood pellets in dwellings (GWh)” and “Fuelwood in holiday cottages (GWh)” is converted to kWh and divided by the series “Number of households, per 1 January”. Annual year-on-year changes are then calculated from that per-household series.

The series “Mean air temperature in Norway, deviation from 1991–2020 normal year” is based on data from the Norwegian Climate Service Centre, specifically the series “Regional mean air temperature, deviation from the 1991–2020 normal (year)” for “Region Norway” (Meteorologisk institutt, 2026).

3.2 Question 14

“Reference is made to table A1 in Appendix 1 to the comments. Please provide the underlying papers and the extended references for the literature listed in table A1, including in particular Bergland (2021) (unpublished).”

The references underlying Table A1 are as follows:

Bye and Hansen (2008), “How do Spot prices affect aggregate electricity demand?” Discussion Papers No. 527, Statistics Norway, 2008.

<https://www.ssb.no/a/publikasjoner/pdf/DP/dp527.pdf>

Halvorsen, B. (2012), “Utviklingen i strømforbruket, prisfølsomheten og strømmarkedet”, Statistics Norway. https://www.ssb.no/a/publikasjoner/pdf/rapp_201202/rapp_201202.pdf

Minkah, R. A. (2024), “RESIDENTIAL DEMAND FOR ELECTRICITY IN NORWAY: ESTIMATING PRICE ELASTICITIES BY INSTRUMENTAL VARIABLE (IV) REGRESSION”, Norges miljø- og biovitenskapelige universitet (NMBU) <https://hdl.handle.net/11250/3148107>

Hofmann, M. and Lindberg, K. B. (2019). "Price elasticity of electricity demand in metropolitan areas – Case of Oslo", International Conference on the European Energy Market. SINTEF. <https://hdl.handle.net/11250/2644848>

Holstad, M. and Pettersen, F. E. L. (2011), "Hvordan reagerer strømforbruket i alminnelig forsyning på endringer i spotpris?", Statistics Norway. https://www.ssb.no/a/publikasjoner/pdf/oa_201102/holstad.pdf

Langeland, J. (2023), "Hvordan påvirker prisnivået på strøm husholdningers strømforbruk? En empirisk analyse av årene 2020-2022", Norges teknisk-naturvitenskapelige universitet (NTNU) <https://hdl.handle.net/11250/3081341>

Skamarken, I. K. and Waymel, M. M. C. (2024), "Hva er de regionale etterspørselastisitetene til husholdninger, og hvilke konsekvenser har elastisiteter på effektivitetstapet som følge av strømstøtten?", OsloMet – storbyuniversitetet <https://hdl.handle.net/11250/3167014>

Jonassen, J. S. and Øby, O. A. (2021), "Tilbud og etterspørsel etter elektrisitet i Norge: En estimering av priselastisiteter i det norske kraftmarkedet", Norges Handelshøyskole (NHH) <https://hdl.handle.net/11250/2982725>

Frankmo, M. A. (2023), "Norske husholdningers pristilpasning i kraftmarkedet", Vista analyse <https://www.vista-analyse.no/en/publications/norske-husholdningers-pristilpasning-i-kraftmarkedet/>

Gamache et al. (2022), "Which Households Respond to Electricity Peak Pricing Amid High Levels of Electrification?" https://papers.ssrn.com/sol3/papers.cfm?abstract_id=4072262

Idsø et al. (2024), "The Short-Term Price Elasticity, Temperature Elasticity, and Wind Speed Elasticity of Electricity: A Case Study from Norway" <https://www.mdpi.com/2071-1050/16/8/3321>

Bergland (2021), "Hushalds priselastisitet for elektrisk kraft", presentation at breakfast seminar, 25 November 2021. The presentation is referred to in Vista Analyse, *Virkninger av høye strømpriser på norsk økonomi*. <https://vista-analyse.no/no/publikasjoner/virkninger-av-hoye-strompriser-pa-norsk-okonomi/>

Halvorsen et al. (2005), "Pris- og inntektsfølsomhet i ulike husholdningers etterspørsel etter elektrisitet, fyringsoljer og ved", Statistics Norway. https://www.ssb.no/a/publikasjoner/pdf/rapp_200508/rapp_200508.pdf

3.3 Question 15

"Please provide data and/or analysis highlighting changes in electricity consumption following the implementation of the electricity support scheme in 2021."

From mid-2021, households in the southern bidding zone (NO1, NO2 and NO5) experienced a significant increase in electricity expenses. The electricity support scheme introduced at the end of 2021 has helped protect households from the most severe price increases. In discussing how the electricity support scheme has affected household electricity consumption, the emphasis is placed on households in Southern Norway, as these were the ones exposed to high electricity prices.

References are made to answer questions 13 iii) and 9, as well as the Ministry's reply to ESA regarding the state aid complaint concerning Norway Price of 15 December 2025. As stated previously, 2022 was an exceptional year, during which the prices of goods, such as electricity and fuel, rose to an extraordinary degree. Lending rates also increased more than anticipated. According to SSB, this 'economic shock' led to an average increase of approximately NOK 18.000 in households' net expenses (Statistics Norway, 2022c).

SSB conducted an evaluation of the electricity support scheme and the impacts of higher electricity prices in 2022, on assignment from the Ministry (Statistics Norway, 2022a). The analyses in SSB's report are based on information that was available in April 2022. Changes to the electricity support scheme after April 2022 are therefore not assessed in the report. In the report SSB finds a substantial average reduction in household electricity use, though it is clearly greater among households living in detached houses and farmhouses compared with those in apartment buildings. Households in apartment buildings began reducing their consumption earlier than those in detached houses and farmhouses, and before the support scheme was introduced. After the scheme came into effect, SSB finds that households in apartment buildings reduced their consumption to a lesser extent, while households in detached houses continued to save electricity. This indicates that the reduction in comfort resulting from the energy-saving measures in autumn 2021 was greatest for households living in apartment buildings. SSB notes that the changes in consumption made by low-income households, particularly those in apartment buildings, led to noticeable reductions in their welfare. These households already have low levels of electricity consumption and have fewer possibilities for substituting electricity with other energy sources.

According to SSB, it is unlikely that households have fully rational and well-informed expectations regarding the electricity support scheme, or that they adjust their behavior as if it were purely a price effect from month to month, given that savings continued to increase even after the support scheme was announced and implemented. SSB explains this in part by noting that "after the electricity support scheme was introduced and the number of media reports on high electricity prices increased, public awareness of this expense also rose, leading households that are usually less price-sensitive to start saving.". As mentioned under question 13 iii) the number of news reports on electricity prices in Norwegian media tripled in 2022. It is therefore not surprising that households that normally have low price sensitivity began to save, as SSB also pointed out.

As elaborated in section 3.1.4 and 3.2.2 in the Ministry's reply to ESA regarding the state aid complaint concerning Norway Price of 15 December 2025, it has traditionally been assumed that households are among the least elastic electricity consumers in Norway, since most electricity consumption is tied to basic necessities. Several studies confirm the assumption that household consumption is inelastic and indicate that the short- and medium-term price elasticity of electricity may be very low. This low elasticity is supported by historical data, which show that outdoor temperatures are the main driver of electricity use. At the same time, some studies also show that people became more price-conscious when electricity prices and other living costs increased substantially during the energy crisis, both in Norway and in Europe. The Ministry considers the period from 2021 to 2022 to be unrepresentative of price responsiveness, both historically and in the years ahead. At the same time, several studies show that access to information plays a significant role in triggering energy efficiency measures in households.

After 2022, household electricity consumption has moved back from an unusually low level towards a more normal level, while still remaining below the levels observed prior to 2022. As highlighted by SSB, the changes in consumption led to noticeable reductions in welfare for some households. The Consumer Council's electricity survey from 2023 also showed that a total of 35 percent of the population reported that their saving of electricity negatively impacted their quality of life (The Norwegian Consumer Council, 2023, p. 26). It is therefore not surprising that consumption to some extent has moved back towards more normal levels, although consumption in households in 2025 was reduced compared to the year before. Consumption is expected to vary from year to year, primarily due to heating needs, which are in turn driven by temperature conditions. In the longer term, continuous improvements in building standards in terms of energy efficiency, together with more energy-efficient appliances and milder winters, will gradually reduce the need for electricity in household consumption.

3.4 Question 16

“ESA notes that the literature relied on to estimate the price elasticity of household electricity consumption in Norway do not recognise or discuss the issue of endogeneity of prices and quantity demanded. Please explain whether and how this affects the reliability of the price elasticity figures put forward in the comments. Please also submit relevant papers or studies that estimates electricity price elasticity and that address the issue of endogeneity (if any).”

The issue of endogeneity is a relevant consideration when investigating the interaction between prices and consumption of electricity, but very complex. Endogeneity in this matter is not constrained by the simultaneity between price and quantity demanded but extends to a broader set of channels. Price and demand both correlate with temperature, and temperature in turn relates to weather more generally, which also affects the level and composition of supply (hydro, wind, and solar power). In the Norwegian system, cold periods tend to coincide with dry weather and weaker wind, reducing hydro and wind generation at the same time as electric heating demand rises, while mild and wet periods coincide with strong inflows and lower demand. Weather likewise affects the access to and price of imports and exports with neighbouring countries that have weather-dependent production. Demand and supply also influence potential bottlenecks across price areas and hence the price level within each zone, as weather conditions can give rise to different impacts on production and consumption within each price zone. This complexity could in principle be addressed through advanced power-market simulations, but no such simulation is complete, and their results must be interpreted with caution.

Beyond these supply–demand co-movements, several household-level factors may also act as omitted variables. The geographic distribution of heating technologies, electric vehicles and self-generation across price zones can pull estimated elasticities in different directions. Exactly how the complete set of endogeneities affects elasticity estimates is therefore difficult to characterize at a general level and is best evaluated study by study. To obtain a broad and well-reflected overview, the ministry has reviewed a range of studies using different identification strategies, data sources and time horizons as described in the response of 15 December 2025. While these studies vary in their treatment of endogeneity, the dispersion in their findings is moderate, and they point consistently in the same direction. Based on these findings it is likely to conclude that residential electricity demand in Norway exhibits relative low short- to medium-run price elasticity.

3.5 Question 17

“Please provide relevant studies, papers and/or statistics showing the degree of substitutability between, on the one side, electricity and electricity-based heating appliances and, on the other side, other sources of energy and heating appliances such as wood and wood-burning ovens (if any).”

Reference is made to 6. c. i.

The question of substitution must be divided into different categories. There is a difference between the substitution between different energy carriers *given the currently installed heating solutions* in households, or whether substitution refers to the *investments in different types of heating equipment*. These are two distinct markets, where different factors influence household behavior.

As for investment in or replacement of heating equipment, households’ general financial situation, domestic interest rates, and the costs of the various technologies are of great importance. These economic variables may vary substantially over time and between households. Such investments are also commonly made in connection with home renovations or when changing residence, which also depend on other economic variables.

The cost of, for example, installing a wood-burning stove can amount to around NOK 70-180 000, depending on the type of stove and whether the household has access to a chimney, etc. Even when a dwelling already has a chimney, installation of a wood-burning stove still involves investments in the range of NOK 25,000–70,000, including installation (Byggtipset, 2026).

By comparison, most homes are connected to electricity, and the cost of installing an additional electric panel heater is very low—down to a few hundred Norwegian kroner—and far less dependent on factors such as interest rates. The economic context is therefore of significant importance when evaluating the market development of different technologies.

Electric heating is and has been the dominant heating technology in Norway. In addition, several households have the option of supplementing heating with other alternatives, such as wood burning if they have a wood stove. There are also significant variations in which types of households have access to wood-burning heating. Wood stoves are far more common in detached houses than, for example, apartments, where around 13 percent have the possibility to heat with wood (Statistics Norway, 2025c). There are also geographical differences, but in most cases, wood burning often functions as a supplementary heating source alongside electricity rather than as a full substitute. Electricity is the dominant household energy source in Norway, while wood burning remains common, particularly in colder periods.

There are no regularly updated official statistics on installed heating equipment across different households, nor official data that compiles and compare sales figures for the various technologies. SSB therefore conducts household surveys that include information on heating equipment, but these are carried out infrequently.

SSB’s survey on energy use in households for 2012 and 2022 is the most relevant official source (Statistics Norway, 2025b), see Table 9 and 10. The survey covers average energy consumption per household for different household types and house types and study the development over time, see Table 9. The statistics also comprise combinations of heating

equipment in dwellings. In 2012, average household energy use was 20 230 kWh, of which around 16 044 kWh was electricity and 3 204 kWh was wood, pellets and briquettes. In 2022, average household energy use had fallen to 17 518 kWh, of which 14 964 kWh was electricity and 2 066 kWh was wood, pellets and wood briquettes. Electricity use per household was therefore reduced by about 7 percent from 2012 to 2022, while the measured use of wood, pellets and wood briquettes was reduced by about 36 percent, or about 30 percent when adjusted for SSB's changed conversion factor for the energy content of wood, see Table 9).

Table 9: Average energy consumption per household, total and per m² dwelling area. kWh¹. Source: Statistics Norway (2025b).

	Total energy consumption (kWh)		Change in per cent 2012 - 2022	Specific energy consumption (kWh per m ² dwelling area)		Change in per cent 2012 - 2022
	2012	2022		2012	2022	
Total	20 230	17 518	-13.4	185	154	-16.8
Electricity	16 044	14 964	-6.7	149	131	-12.1
Oil and kerosene	698	0	-100.0	6	0	-100.0
Wood, pellets and wood briquettes ²	3 204	2 066	-35.5	27	15	-44.4

¹Consumption of district heating and gas is included in the total energy consumption but is not shown explicitly here. However, figures for this is available in the Statbank, table 10572.

²For 2022, a factor of 4.3 kWh per kilogram is used for the energy content of firewood, whereas this factor was previously 4.67 kWh per kg. The actual decrease in firewood usage from 2012 to 2022 is approximately 30% (in total) and 38 % (for specific consumption) when accounting for the changed factor.

Table 10: Average energy consumption by product, per m² dwelling area. kWh supply of energy. Time series. Source: Statistics Norway (2025b).

	1994	1995	2001	2004	2006	2009	2012	2022
Total¹	212	211	203	186	190	181	185	154
Electricity	169	169	164	145	147	146	149	131
Oil and kerosene	15	15	11	13	12	7	6	0
Wood, pellets and wood briquettes ²	27	26	28	27	30	27	27	15

¹Figures for consumption of district heating and gas are included in "Total" and is shown explicitly in Statbank table 10572.

²Up to and including the 2009 survey, some consumption of coal and coke was also included under the category 'firewood, pellets, and wood briquettes'.

The same statistics also show that the substitution ability differs significantly between dwelling types. In 2022, average energy use was highest in farm dwellings and detached houses, at about 26 600 kWh and 22 800 kWh respectively, while households in apartment blocks used about 10 550 kWh on average. Wood use also differs strongly by dwelling type. Farm dwellings used about 6 500 kWh of wood on average in 2022, whereas households in apartments used only about 340 kWh on average. SSB links this to the fact that fewer apartments have wood-burning stoves. About 85 percent of farm dwellings had a closed wood-burning stove, compared with only 13 percent of apartments (Statistics Norway, 2025c).

SSB states that consumption of wood is closely linked to outdoor temperatures, and that deviations in autumn, winter and spring temperatures help explain annual fluctuations in wood use. The cold winter in 2010 led to the highest measured wood consumption in the survey series, while milder weather, more efficient heat pumps, replacement of old stoves and better insulation have contributed to lower wood consumption (Statistics Norway, 2021). In addition, the adoption of heat pumps has increased significantly since then. This indicates that changes in wood or electricity consumption cannot alone be used as evidence of substitution caused by relative prices. Weather, building standards, technology innovations and household composition should also be considered.

Electricity-based heat pumps are not a substitute for electricity. Rather, they are an electricity-based technology that reduces energy use for heating. In 2012, SSB found that detached houses with heat pumps used less total energy than comparable houses without heat pumps, but that the difference was mainly shown in lower use of wood and oil, not necessarily lower electricity use, since air-to-air heat pumps themselves use electricity, and is also used for cooling during summer (Statistics Norway, 2014). In a 2022 analysis, SSB notes that heat pumps make electricity consumption cheaper because they deliver more energy than they consume in electricity, which lowers the effective price per kWh of useful energy. According to SSB, investing in a heat pump may allow households to use more energy to increase comfort, for example by maintaining a slightly higher indoor temperature in winter or by using the heat pump as an air conditioner in summer (Statistics Norway, 2022b). This is also consistent with NVE, which makes this point explicitly in its 2016 report *Heat pumps in the energy system*:

“Most air-to-air heat pumps can be reversed and used for cooling in summer (air conditioning). However, cooling is more energy-intensive than heat production, and the coefficient of performance is therefore lower for cooling than for heating. Since most dwellings in Norway do not currently have cooling systems, extensive use of air-to-air heat pumps for cooling could lead to increased energy use”. (NVE, 2016, page 51).

The prevalence of heating solutions and -technologies must also be assessed on the involvement in other relevant factors, such as centralization trends, building developments and regulations, requirements for clean-burning stoves, required safety measures, as well as economic conditions mentioned earlier.

3.6 Question 18

“Please provide any studies or statistics demonstrating an increase in purchases of conventional electrical heating appliances following the introduction of the electricity support scheme in 2021.”

The Ministry is not aware of any publicly available statistical analysis that directly documents an increase in purchases of conventional electrical heating appliances (e.g. panel heaters) attributable to the introduction of the electricity support scheme in December 2021, see also answer to question 17. Aggregate sales statistics for electrical heating equipment are collected by the industry association Elektroforeningen (EFO) and Stiftelsen Elektronikkbransjen, but these are not part of official Norwegian statistics and are not made publicly available at a level of granularity that would allow such a causal inference to be drawn.

Press coverage has at various times reported short-term increases in retailer sales of electric heaters. However, this coverage primarily attributes such sales increases to cold weather rather than to electricity prices or the support scheme. A particularly illustrative example is an industry survey from March 2018 (several years before the introduction of the support scheme) in which major Norwegian retailers (Elkjøp, Power, Euronics, Komplett) reported sales increases on the order of 40–50 per cent during a cold period, with industry representatives stating that consumer demand for heating equipment varied inversely with outdoor temperature (Elektronikkbransjen, 2018). Subsequent reporting by NRK (Glørstad, 2026) and Dinside (Terisen Christopher, 2026) during cold periods in later winters has reproduced the same pattern. The relationship between cold weather and short-term heater sales is therefore well established and pre-dates the support scheme. Reported sales fluctuations during 2022–2024 would require controlling for weather and other confounders to the support scheme, and to our knowledge no such analysis exists. However, the same pattern is visible for cooling products during warm periods. Norwegian retailers have reported increased sales of fans and air-conditioning products, including temporary stockouts (E24, 2025). Industry reports have linked warm summers to increased sales of heat pumps, partly because consumers become aware that air-to-air heat pumps can also be used for cooling (Byberg, 2014). These examples illustrate why short-term sales figures for heating or cooling appliances cannot be interpreted causally without controlling for weather and other seasonal factors.

Two further considerations weigh against the underlying premise of the question. First, an increase in unit sales of conventional heating during a cold period would not in itself demonstrate increased long-term reliance. Conventional electrical heating appliances such as freestanding panel heaters, oil-filled heaters and fan heaters are typically purchased as supplementary heating for use during particularly cold periods, rather than as a household's primary or sustained source of heat. Assessing whether the support scheme has influenced sustained electrical heating use would therefore require analysis of actual consumption data rather than retail turnover. Second, the relevant alternative to a panel heater in the Norwegian context is typically a heat pump or comparable system requiring a substantially higher upfront investment, as elaborated in answer 17. The choice between these categories is strongly influenced by interest rate in the economy, installation cost, household liquidity, and the availability of Enova grants — not by short-run variation in the effective electricity price.

3.7 Question 19

“Recently, there have been reports showing increases in electricity consumption amongst customers that have subscribed to Norway Price for electricity for the period October 2025 – January 2026 compared to the same customers’ electricity consumption for the same period in the preceding year.³³ Moreover, customers who subscribed to Norway Price seems to have increased their consumption more than customers who did not subscribe to Norway Price. Considering your argument in section 3.2 of the comments that the Norway Price for electricity scheme will result in little to no increase in household electricity consumption, please provide a comment on the reports.”

The observation reported is genuine in the sense that the year-on-year comparison does describe a real difference between the two groups. However, a simple comparison of this

³³ See Annex I to this letter.

kind points to an observed difference in group averages rather than to a causal effect, and will be strongly influenced by *what* is compared, *when* it is compared and *how* the comparison is carried out. The Ministry has significant reservations about the method used by the complainants and in various media reports to substantiate the claim that the “Norway Price” increases consumption.

The variation in consumption across different households is not new, even though detailed data are only now being analyzed: As a starting point, the Ministry underlines that household consumption always has varied, between different periods, weather conditions and between different kinds of household. In the period prior to the introduction of the Norway Price however, assessments of the development in household consumption over time have largely been concentrated on aggregate figures. This is partly due to the fact that detailed household-level data have not previously been publicly available to the same extent as now³⁴. With household-level data, it would in principle be possible to control for metering-point fixed effects, household-specific trends and observable changes before and after opting for the Norway Price scheme. However, with aggregated group data, as to the Ministry knowledge is what is used in the reports referenced in question 19, the analysis is largely limited to comparing averages between the groups.

Secondly; The households examined are not the same households over time. The sample being examined is continuously changing for several reasons. The metering points are linked to the dwelling, not the household in itself. Furthermore, since the startup of the Norway Price scheme, it has been an continuous evolvement in the number, location and features of households opting for the scheme. Hence the household behind the consumption one compares - in the two categories with or without Norway Price- will be different each time and are not comparable throughout the period, ref figure 6 and 7.

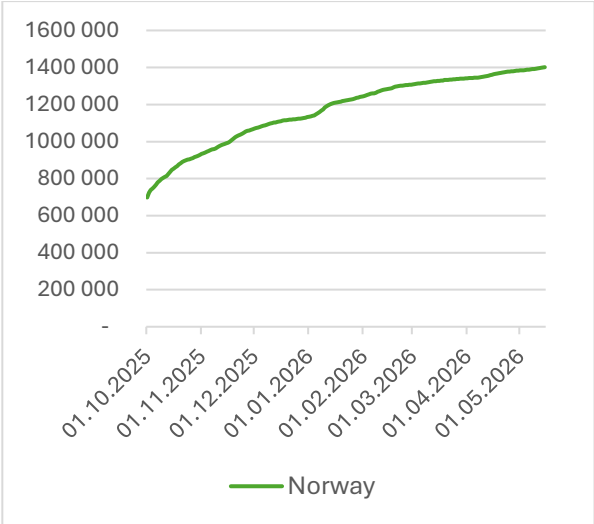


Figure 6: Total number of household metering points with Norway Price. Period: 01.10.2025–15.05.2026. Source: Elhub.

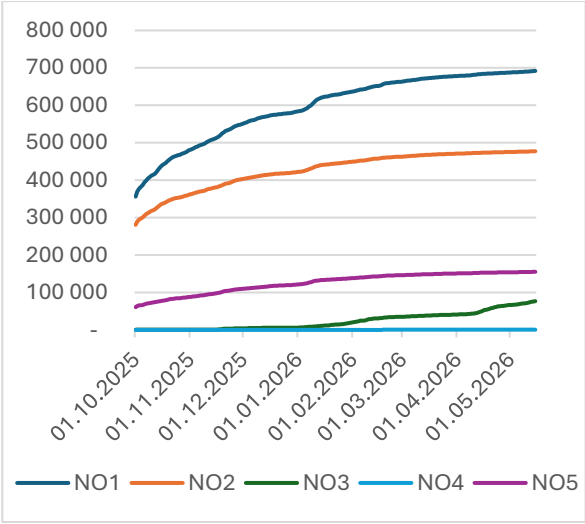


Figure 7: Number of household metering points with Norway Price per bidding zone. Period: 01.10.2025–15.05.2026. Source: Elhub.

³⁴ Access to non-aggregated household electricity consumption data is restricted due to privacy considerations. Such data can typically only be accessed and used by actors with a specific legal basis, customer consent or another clearly defined purpose for processing the data.

Comparing a household with itself in the preceding year does not fully resolve the issue either, since it does not control for within-household changes over time. The household may have new residents, may have acquired an electric vehicle, or may have undertaken energy efficiency investments; any of which would shift the consumption baseline independently of the price scheme, and could potentially also correlate/affect the choice of committing to Norway Price or not.

Thirdly; the claims conflate the cause of the change with the outcome: Whether the relative increase in consumption among some Norway Price subscribers has arisen as a result of the scheme, or despite it, is not something a year-on-year comparison can establish on its own. Data and statistics can be assembled to fit a preferred narrative when not subjected to rigorous methodological scrutiny, and the comparison underlying the reports omits several confounders that materially affect interpretation.

Fourthly; the comparison of consumption is made without accounting for variations in temperatures: January 2026 was unusually cold. The last comparable cold spell was in 2010, when household electricity consumption set a record and grew by approximately 10 per cent year on year in January. 2021 was also a year with approximately the same level of cold throughout the winter. If we compare household and holiday home consumption during this period, consumption in 2026 (January–April) is on the same level as 2021 (slightly lower) in the price zones where the ‘Norway Price’ is prevalent³⁵. Comparing a cold post-treatment period against a milder pre-treatment period as 2025 will mechanically produce a consumption difference, and a substantial part of that difference reflects temperature rather than any change in the price scheme. The problems then arise if the two groups have characteristics that imply that they react differently to temperature change, for example, households with larger dwellings and greater heating needs, lack of access to alternative energy carriers, or households with more members as described below.

Selection bias; Subscription to Norway Price is not randomly assigned. It is plausible, and indeed likely, that more temperature-sensitive and high consuming households, which are more affected by electricity price volatility, self-select into Norway Price more readily than those who are not. If temperature then varies between the two periods being compared, the price-sensitive group will mechanically display a larger consumption response, irrespective of any causal effect of the scheme itself. Figure 8 illustrates this directly: it plots the correlation between temperature in levels and the difference in electricity consumption between the two groups for medium consumers³⁶ in NO1 and shows clear co-movement when hitting cold temperatures. The pattern indicates that the households that opt for the Norway Price scheme may also be the more temperature-responsive segment of the population. The relevant question is therefore not whether these households use more electricity when it is cold, they evidently do, but whether this responsiveness is attributable to Norway Price itself.

³⁵ Southern Norway, bidding zones NO1, NO2 and NO5. *Elhub data (07.06.2026)*.

³⁶ Medium consumers refer to households with an estimated annual electricity consumption between 8,000 – 16,000 kWh (EAC-group “Medium”).

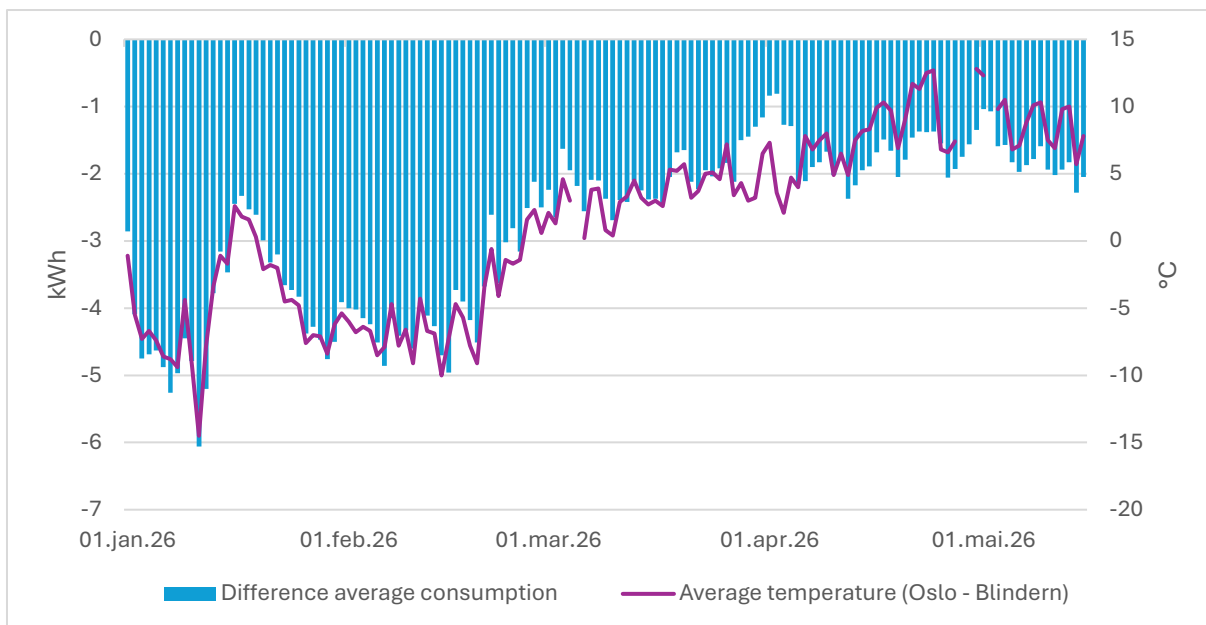


Figure 8: Temperature and consumption differences between medium households with and without Norway Price in NO1, for the period 1 October 2025 – 15 May 2026. Blue bars (left y-axis) show the difference in average daily electricity consumption for medium household consumers with and without Norway Price in NO1 (Oslo area). Purple graph (right y-axis) shows the daily mean air temperature in Oslo (Blindern). Difference in average consumption is calculated as the average consumption per household metering point without Norway Price minus the average consumption per household metering point with Norway Price for EAC-group Medium. Sources: Elhub and Norwegian centre for climate services.

Household characteristics further complicate the comparison. Types of dwelling and household size have well-documented effects on electricity consumption: detached houses use more than apartments, and larger households more than smaller ones. Other important factors which is likely to be correlated both with the likelihood of opting for the Norway Price scheme and the subsequent consumption development includes insulation standard, electric heating, heat pumps, wood stoves, district heating, electric vehicles, income, age, home-office patterns, electricity supply contract, energy-efficiency measures or housing contracts where hot water or heating is included. If the households more likely to choose Norway Price systematically differ on these dimensions, and if these characteristics are not controlled for, then the observed difference between the groups confounds any effect of the scheme with the effect of household composition. Without such controls, one cannot determine whether these households would have shown a smaller increase under the same weather conditions in the absence of the Norway Price scheme.

The group of households with Norway Price had substantially higher electricity consumption than the group without Norway Price already from the beginning. As shown in Figure 9, the share of Norway Price households is considerably higher in EAC-group “High” than in EAC-group “Low”. This indicates that the households with Norway Price is likely to contain a higher proportion of households with features linked with higher and more temperature-sensitive electricity consumption, such as larger dwellings, more electric heating, higher expected consumption, electric vehicles, higher income, or more limited access to alternative heating sources. Such features also affect how consumption develops over time, independently of Norway Price. A year-on-year comparison between groups does not resolve this selection problem and cannot correct for different underlying trends between the groups.

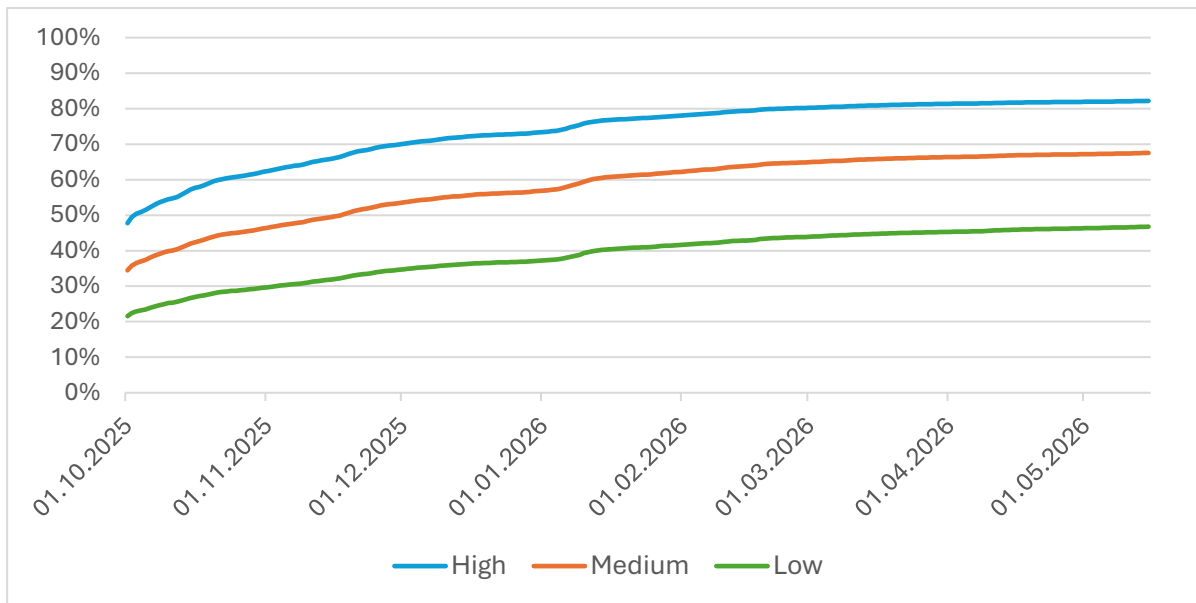


Figure 9: Share of household metering points with Norway Price in Southern Norway (NO1, NO2, NO5) per EAC-group (estimated annual electricity consumption group, “High”: >16,000 kWh, “Medium”: between 8,000 – 16,000 kWh, “Low”: < 8,000 kWh). Period: 01.10.2025–15.05.2026. Source: Elhub.

Figure 10 serves to illustrate how a simple between-group comparison can be made to support a conclusion one prefers. It shows the average daily household consumption among high consumers³⁷ (a group of households accounting for roughly 60 per cent of total household electricity use) for the two groups and indicates that households without Norway Price consistently tends to use *more electricity* than households with Norway Price in Southern Norway. By treating any difference in consumption between the two groups as attributable to the price scheme itself, one would conclude that Norway Price reduces household electricity consumption, and furthermore that this conclusion applies to the majority of household consumption since the group “High” represents 60 percent of electricity use in this sector. This is evidently not a defensible causal interpretation, but it is the conclusion that the simple comparison of this data produces. The point is not to claim that Norway Price reduces consumption, but to demonstrate that a direct comparison of group averages can be made to support contradictory conclusions depending on which slice of the data one chooses.

Deriving robust causal estimates from observational data of this kind requires a substantially more rigorous methodological framework than such a comparison provides.

³⁷ High consumers refer to households with an estimated annual electricity consumption above 16 000 kWh (EAC-group “High”).

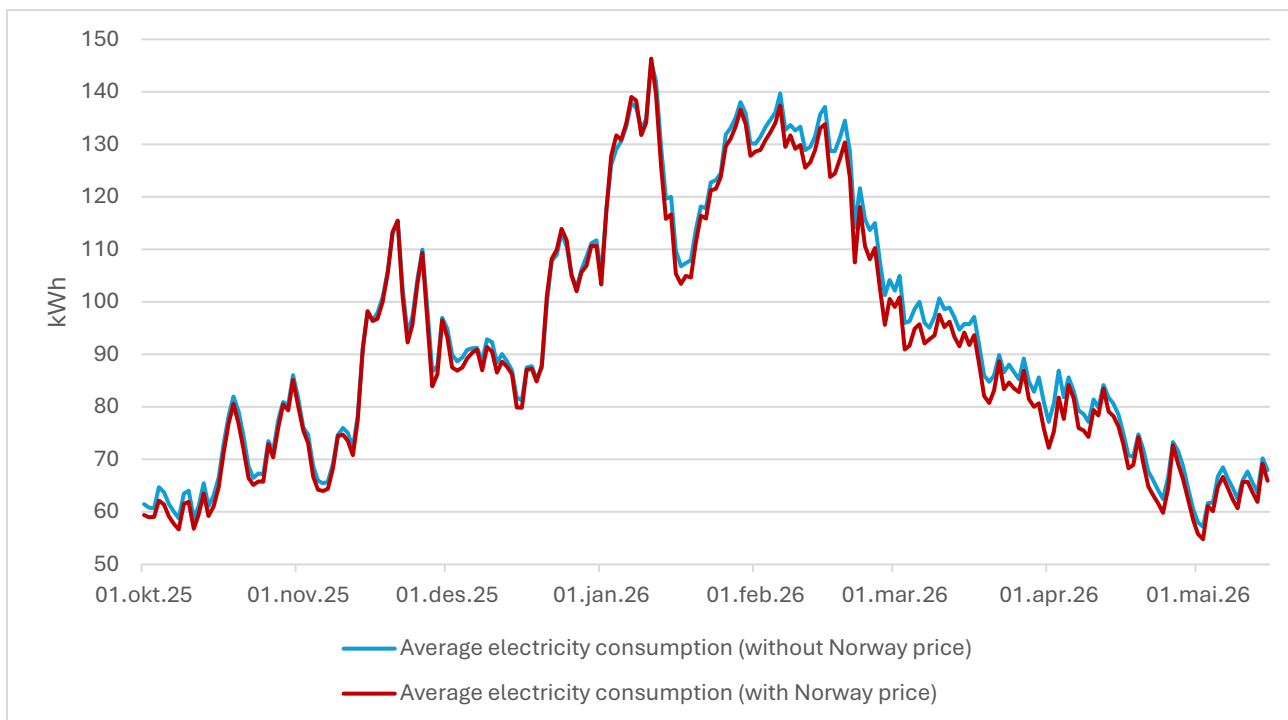


Figure 10: Average daily electricity consumption for household consumers in EAC-group High (estimated annual consumption > 16,000 kWh) with and without Norway Price in NO1 and NO2 (Southeast- and Southwest-Norway). Source: Elhub.

Likewise, the observed consumption in holiday dwelling shows the same tendency. In this group, customers with Norway Price consistently have a lower consumption than customers without Norway Price, see figure 11.

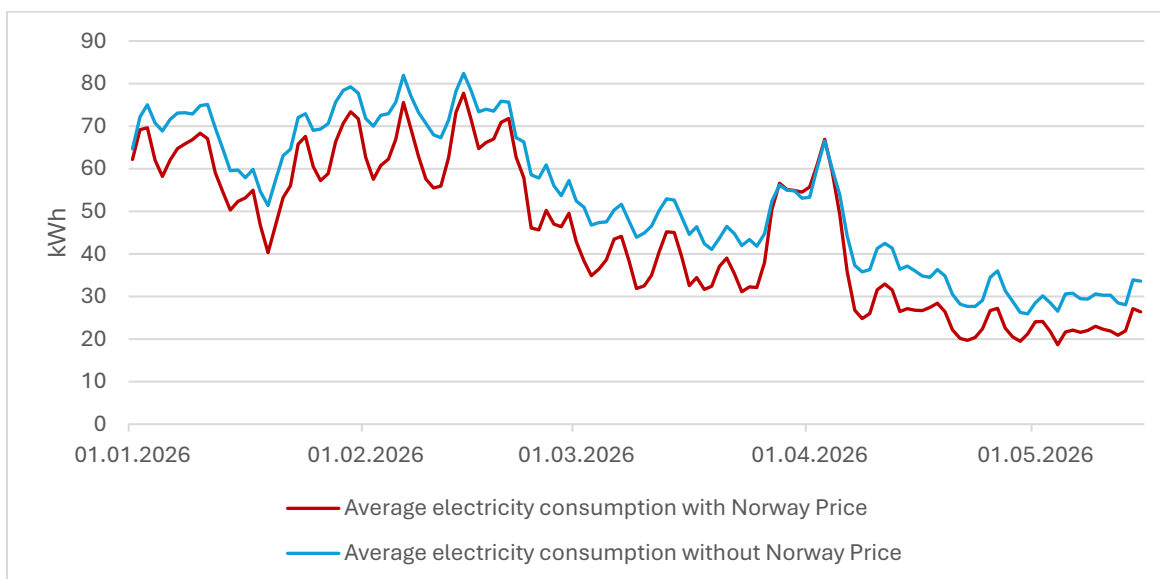


Figure 11: Average daily electricity consumption for holiday dwelling consumers in EAC-group High (estimated annual consumption > 7,000 kWh) with and without Norway Price in Southern Norway (NO1, NO2 and NO5). Period:01.01.2026 -15.05.2026. Data from Elhub (18.05.2026).

Lastly: Household consumption does not show signs of abnormal growth: Regardless of methods that aim to highlight one group or another, any abnormal increase in electricity consumption resulting from the 'Norway Price' would have to be visible in total consumption in the areas where the 'Norway Price' is prevalent. The figures do not show this. On the

contrary, electricity consumption in households in Southern Norway declined in 2025, and December consumption was the lowest recorded in the past six years. Household consumption from January to April is in line with the level in 2024, and lower than in 2021, the last time we had a winter of roughly comparable cold. This is despite a significant increase in the number of households in recent years, as well as strong growth in the number of electric vehicles. In 2025 alone, the number of electric vehicles in Norway increased by 20 percent. The effects of temperatures are evident when compared with consumption in the tertiary sector—that is, consumption in service industries, schools, hospitals, and hotels—which also have high heating needs. Consumption in this sector increased by between 11–13 percent in January and February 2026 compared with the same months in 2025.

Since the introduction of the Norway Price scheme, master's students have also contributed to the research on its effects. One such thesis sets out to evaluate how the introduction of the scheme has affected the Norwegian electricity market, including the consumption profile and prices, while others investigate how it has affected consumption growth more generally. The Ministry welcomes any such contribution but still considers it too early to draw firm conclusions, and sees a need for longer, more detailed and more comparable data in order to isolate any causal effects. Some of the estimated effects are not based on a direct causal comparison of households with and without the Norway Price, but on a modelled chain from estimated price elasticity to theoretical additional consumption and simulated spot prices. The results are therefore sensitive to assumptions regarding household selection, uniform price elasticity across households and hours, and the simplified representation of market clearing. Other analyses and comparisons, as noted previously, struggle to ensure that the estimated differences between the groups are not driven by selection bias. Based on the publications we have seen so far, it remains difficult to distinguish the variation in consumption attributable to the Norway Price scheme from variation driven by other factors, such as temperature, changes in household behavior, and a still-limited understanding of what distinguishes the consumers who do not choose the Norway Price scheme from those who do.

Taken together, these considerations indicate that while different observations in data can be made, attributing it to Norway Price — as opposed to temperature, self-selection on preferences, household composition, or unobserved within-household change — requires a substantially more rigorous identification strategy than a simple year-on-year comparison can supply.

3.8 Question 20

“Reference is made to page 25 in the comments, where it is stated that “[t]he Ministry expects air-to-air heat pumps [...]to still be a profitable investment with Norway Price.” Please state the reasons as to why you expect the air-to air heat pump to still be a profitable investment for consumers subscribing to Norway Price.”

Reference is also made to the answers in section 2.4 in the Ministry’s comments to the additional comments from the complainants and 3.6 (Q18) which underline that other factors, as the current interest rates and economic situation, development in technology cost, frequency of refurbishments etc. play a vital role in households decisions regarding investments in new heating equipment or energy efficiency technologies and measures.

The Norway Price scheme in itself does not remove financial benefits of installing air-to-air heat pumps. Heat pumps still reduce electricity consumption and costs for heating.

Households also continue to pay grid tariffs, supplier surcharges, VAT, electricity tax and the Enova fee in addition to the Norway Price. On that basis, households still have a financial incentive to invest in energy-efficiency measures, including air-to-air heat pumps, provided that the other factors described above remain unchanged. Total household electricity costs under the Norway Price scheme remain substantial and air-to-air heat pumps will therefore normally still be profitable. The comments are in line with the statement by Rolf Iver Mytting Hagemoen, head of The Norwegian Heat Pump Association (NOVAP), to *Teknisk Ukeblad* in connection with the proposal to introduce the Norway Price scheme, in which he argued that heat pumps are in a special position in that they are profitable regardless (Teknisk Ukeblad, 2025).

Furthermore, NOVAP states in their own press release regarding heat pump sales and the Norway Price scheme that “air-to-air heat pumps still will be very profitable for many” (Norsk Varmepumpeforening, 2025). Other market actors like *Kinnan Norge AS*³⁸, states that a heat pump still results in lower electricity bills under the Norway Price scheme, as it delivers multiple units of heat per unit of electricity consumed (EnergiAktuelt, 2025).

The above is consistent with the latest sales figures from EHPA. According to EHPA, Norway remained Europe’s largest heat-pump market relative to population size, with 43.8 units sold per 1,000 households in 2025 (European Heat Pump Association, 2026) (see figure 12). This corresponds to 21 percent more sales per household than Finland, the second-largest market, and 428 percent more than in Germany. Meanwhile, NOVAP and Prognosesenteret’s heat pump market outlook in 2024 – published prior to the announcement of the Norway Price scheme – indicated somewhat weaker market conditions the coming years, driven by high mortgage rates, reduced housing construction and slightly lower mobility in the housing market (Norsk Varmepumpeforening, 2024).

Statistics from NOVAP support that sales of heat pumps remain at a historic high level in Norway compared with the years prior to the energy crisis (see figure 13 and 14). This is particularly evident given that the expected decline in interest rates in Norway has not materialized, and that Norwegian interest rates are expected to remain high going forward, in contrast to for example other Nordic and European countries. This affects many households in Norway, which have a high level of housing debt compared to most other countries. Differences in interest rates also provides a background for any differences in investment by households compared to other countries, though many countries may have experienced a decline or reduced growth rate in technologies such as solar panels on roof or heat pumps following the peak years during the energy crisis.

³⁸ Official Nordic distributor of Panasonic, Hitachi, and Animair heat pumps.

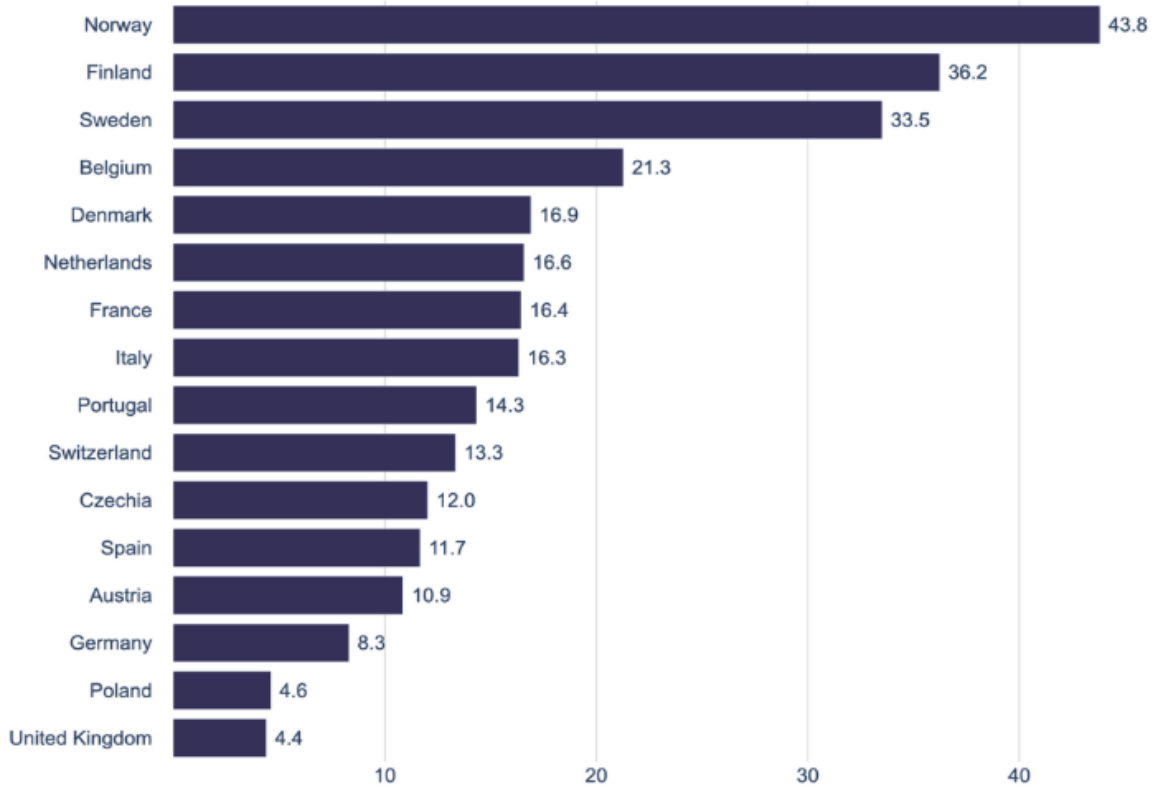


Figure 12: Heat pump sales per 1,000 households in 2025. Source: EHPA (2026).

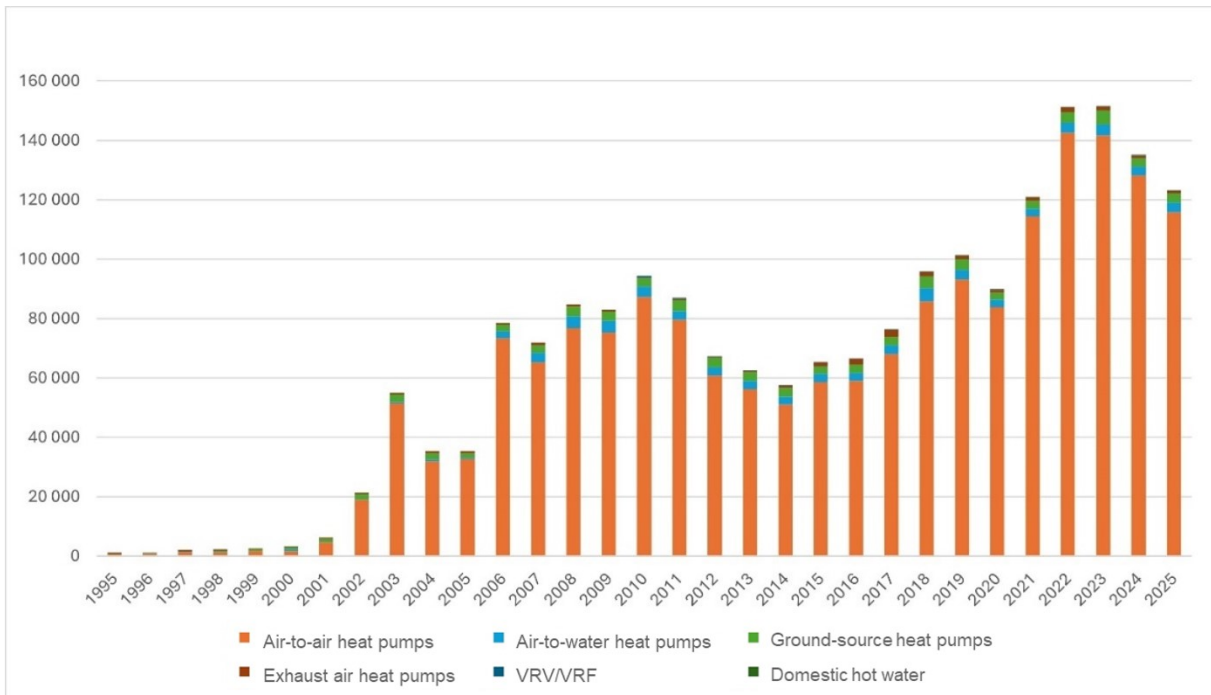


Figure 13: Total heat pump sales in Norway, 1995-2025, by segment. Source: The Norwegian Heat Pump Association (2026b).

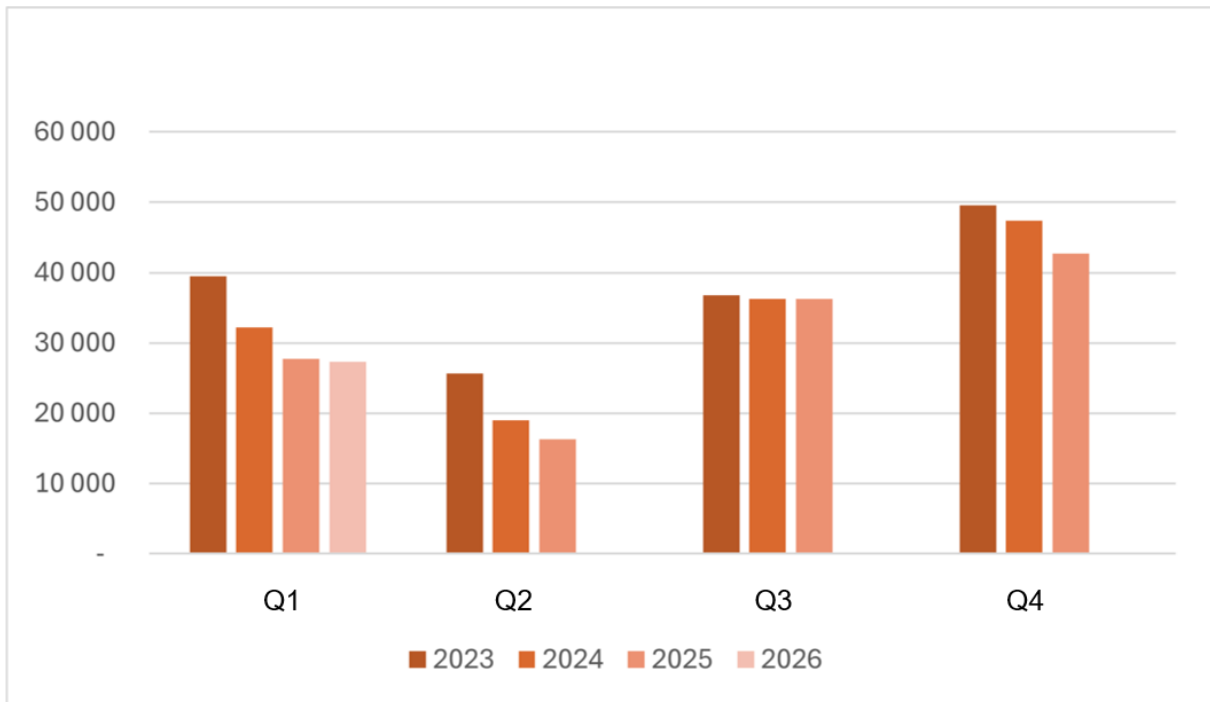


Figure 14: Number of heat pump units sold in Norway per quarter 2023 - 2026. Source: The Norwegian Heat Pump Association (2026a).

3.9 Question 21

“Reference is made to pages 42 – 43 in the comments, where it is claimed that “[m]ost Norwegian households do not have the option to replace electricity- based heating with another energy source.” Please expand on the claim and provide sources to support the claim.”

According to 2024 statistics, energy use in Norwegian households, including holiday homes, amounted to 39 TWh (84 percent) electricity, 5.6 TWh (12 percent) bioenergy, 1.9 TWh (4 percent) district heating, and negligible amounts of LPG and natural gas (0.1 percent) (Statistics Norway, 2025a) This highlights the dominant role of electricity in meeting household energy demand in Norway. NVE estimates that around 1.3 million heat pumps are installed in Norway to date, mainly air-to-air heat pumps in households (Energifakta Norge, 2025). EHPA operates with a higher number and reports up to 1.7 million heat pumps, giving the highest penetration in Europe, at 632 heat pumps per 1,000 households (European Heat Pump Association, 2025).

According to SSB, studies show that energy substitution possibilities are highly correlated with housing type (Statistics Norway, 2022a). Detached houses and farmhouses generally have the greatest potential for substitution, while apartment buildings have the least.

In addition, legal and institutional factors – such as ownership structures, laws, and regulations – may influence households' ability to switch energy sources for heating, as well as their financial flexibility to do so.

Since the use of mineral oil (fossil fuel oil) for heating in buildings is prohibited in Norway³⁹, the primary alternatives to electric heating are bioenergy and district heating. Both options require appropriate infrastructure, and switching away from electricity can be relatively costly if the building is not already equipped for these solutions.

In the case of bioenergy, this typically involves wood burning or pellet-based heating, which in turn requires a chimney, sufficient space for the heating appliance, and a possibility to store the wood or bioenergy. While many Norwegian homes are equipped with a wood stove or fireplace and a chimney, bioenergy often serves as a supplement rather than a full substitute for electricity. In many cases, only the room with the stove or fireplace can be effectively heated. Further, heating with a wood stove requires manual operation, including regularly adding firewood, which is one reason why wood stoves are not a fully adequate substitute for automatic heating systems.

District heating in Norway is mainly available in urban areas (NVE, 2026b). It requires buildings to be equipped with a hydronic (water-based) heating system, in which hot water is distributed through pipes to provide heat. Where such systems are not already in place, installation costs can be significant.

4. Miscellaneous questions

4.1 Question 22

“Reference is made to pages 25 – 26 of the preparatory works to the Norway Price Act, where it is stated that the:

“Ministry notes that several consultation bodies point out that the Norway Price scheme may reduce the incentives for energy efficiency and energy savings. The Ministry assumes that certain energy-efficiency measures that are profitable today may be considered unprofitable after the introduction of the Norway Price scheme.”

Please elaborate on the energy-efficiency measure that the Ministry assumes may be considered unprofitable following the introduction of the Norway Price scheme.”

The Ministry assumes that some energy efficiency measures that became profitable as a result of exceptionally high electricity prices may no longer be profitable following the introduction of the Norway Price scheme. This particularly applies to technologies that are not yet market-ready under normal price conditions, but which became economically viable at substantially higher electricity price levels. Investments in these kinds of technologies may, however, in some cases be eligible for support from Enova.

³⁹ From January 1, 2020, the use of mineral oil (fossil fuel oil) for heating in buildings was prohibited, cf. Regulation on the prohibition of the use of mineral oil for heating of buildings (Forskrift om forbud mot bruk av mineralolje til oppvarming av bygninger).

Yours sincerely

Kaja Moe Winther

Deputy Director General

Hege Smith Heiberg

Chief specialist

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Appendix

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