

Diariern

10-2015-0121

Vårt datum/Our date

2015-01-16

Vår referens/Our reference

Ert datum/Your date

Er referens/Your reference

ACER / ENTSO-E

Geode

Swedenergy

Reply to the ACER / ENTSO-E document: ” Role of stakeholders in the implementation of network codes and related guidelines, and in particular the establishment of European Stakeholder Committees for network code implementation”.

Göteborg Energi (hereafter “GE”), appreciates the opportunity to reply to the above referred document. GE, also a DSO, is a 100% municipality owned energy company in Gothenburg, Sweden. It operates electricity, district heating/cooling, gas and energy trade. Some key figures for 2013: Turnover: 769 MEUR, Result: 78 MEUR, No. of employees: 1174. GE is member of the associations Swedenergy and Geode, among others.

GE finds the main ambitions and objectives with Network Codes (hereafter NC) important for developing EU in a more sustainable and market based direction. However, GE has some major concerns with NC; with some of their objectives but also with their development process. Therefore GE supports Swedenergy’s comments forwarded separately.

It is crucial for EU to look at its electrical system as a complete unit and a tool for enabling EU’s business to develop positively in order to obtain a strong competitive position in relation to other parts of the world. Today, one sometimes gets the impression that it is more a question of an EU internal sub-optimisation between various interests. Stakeholders’ true involvement in the process hence is crucial, especially at national level. This is particularly important for the DSOs, since it is normally only DSOs that talk to the vast majority of the end customers. It will hence be up to the DSOs to explain to “everybody” the pros and possible cons with NC, as they will be implemented, becoming reality.

ACER and ENTSO-E should thus clearly direct their national bodies to enhance the dialogue with stakeholders, in order not only to allow them to comment on results at the end of the process, but rather to involve them actively in the entire work.

NC's objectives are i.a. to open up an EU internal electricity market and to allow the introduction of larger amounts of intermittent energy production (mostly wind and solar). These objectives are perfectly understandable, but it is necessary to perform national consequence analyses (Cost-Benefit Analyses, CBAs) in order to get a picture of what consequences the introduction of NC will cause. The change rate required of the electrical system because of the NC introduction could be questioned since substantial costs are involved. It is also important for member states to understand national consequences in terms of cost, employment and competitiveness, expressions that a wider audience also would understand. This kind of "translation" has never been done up to now, to GE's knowledge.

For a successful implementation of NC, the true involvement of stakeholders – especially DSOs – at the national level is key. It is also important to make national consequence analyses and to "translate" them into terms such as cost, employment and competitiveness in order to allow an understandable communication to a wider audience.

GÖTEBORG ENERGI AB

Deputy Managing Director