

ACER - Agency for the Cooperation of Energy Regulators
Trg republike 3
1000 Ljubljana, Slovenia
Sent by email: consultation2014G03@acer.europa.eu

Lange Houtstraat 2
2511 CW Den Haag

T. (+31) 70 311 43 50

F. (+31) 70 311 43 51

www.energie-nederland.nl

info@energie-nederland.nl

KvK Den Haag 50816179

Our reference ENL-2014-00441
Handled by Mr H.B. Schurink
Dial-direct +31 70 311 43 71
E-mail hbschurink@energie-nederland.nl
Date 19-05-2014

Subject Consultation Rules for Trading

Dear Mr, Ms,

Energie-Nederland is the sector association representing the interest of the Dutch energy companies in production, wholesale and retail of electricity, gas and district heating.

We welcome the opportunity to respond to ACER's public consultation questionnaire for the preliminary scoping on potential Framework Guidelines on "Rules for Trading related to technical and operational provisions of network access services and system balancing (FG RfT)"

We don't follow the questions in the questionnaire, because we don't have the extensive expert knowledge or the detailed experience. Since harmonised rules have already been put in place and others will soon be adopted or are at various stages of progress, Energie-Nederland considers that the immediate priority should be to implement these rules in all member states and then evaluate the effect of these rules. Therefore we are of the opinion that both the timing and the suggested method (introducing a new Framework Guideline) are not appropriate to address the issues mentioned in the consultation.

We think it would be unwise to develop a new Framework Guideline before the other Network Codes are implemented and have had time to show what they can do (*timing*). In any case, any new or additional regulation would have to be complementary and consistent with existing provisions. Therefore we think it would be easier to merge any new requirements with the existing Network Codes and don't develop a new Framework Guideline / Network Code (*method*).

We think improvements should be addressed through an open and structured dialogue between all parties concerned (for example in the GRI; during the monitoring of the implementation of EU Network Codes).

If you have any question to this response, you can contact Mr Hein-Bert Schurink of our organisation (see his contact details in the header).

Best regards,



Mr Anne Sypkens Smit
Director (interim)