



Giniúint agus Margáí Mórdhíola
Bord Soláthair An Leictreachais
Sráid Mhic Liam Íochtarach, Baile Átha Cliath 2, Éire
Láithreán Gréasáin: www.esb.ie

Generation & Wholesale Markets
Electricity Supply Board
Lower Fitzwilliam Street, Dublin 2, Ireland
Website: www.esb.ie

By email to:

ACER,
Trg republike 3,
1000 Ljubljana,
Slovenia

ENTSO-E,
Avenue de Cortenbergh 100,
1000 Brussels,
Belgium

Date: 23rd January 2015

RE: European Stakeholder Committees for Network Code Implementation

Dear

I am writing to you both in relation to the public consultation on stakeholder engagement in the network code implementation process. ESB GWM have reviewed the consultation document published on December 12th 2014 and would like to raise the following points:

- ESB GWM welcomes the concept of Stakeholder Committees and indeed the use of a public consultation to aid the development of their structure, organisation and deliverables as outlined in the consultation.
- ESB GWM would support the general principles of the Stakeholder Committees outlined in the consultation in particular the need to ensure that all industry and customer views are taken into account and that all Stakeholder Committees have the appropriate composition.
- In addition to taking all views into account, it is essential that all views of the stakeholder committee, regardless of whether or not the committee is in full agreement, are communicated to those making decisions on the network code amendments i.e. ACER and the European Commission.
- Regarding the proposed structure shown for the organisation of the Stakeholder Committees ESB GWM would seek further clarity on the role and composition of the National Structures and the Regional Stakeholder Committees. Neither are described in the consultation document.
- ESB GWM would question if the use of these groups will ensure that all industry and customer views are taken into account as they could potentially be dominated by one party e.g. TSOs.
- To overcome this it is essential that National Structures and Regional Stakeholder Committees have representatives from across industry and that in cases where views differ within a group that all opinions of the group feed into the Stakeholder Committees.

If ESB GWM can help in anyway to further explore these options or you would like to discuss this response in more detail we would gladly assist.

Regulation Manager,
ESB Generation and Wholesale Markets
27 Lower Fitzwilliam Street, Dublin 2