



GEODE COMMENTS ON ACER WORK PROGRAMME 2016

GEODE, the voice of local energy distributors across Europe welcomes the opportunity to provide comments on ACER draft Work programme 2016.

GEODE supports the tasks and deliverables proposed by ACER in the draft work programme for 2016 which seem to be sensitive - in particular those regarding Network Codes, the internal market monitoring and REMIT.

We particularly support the importance of prioritizing the adoption and implementation of Network Codes both in electricity and gas. For instance, Member States will have to 'translate' the common methodologies, principles and criteria into reality, define non-exhaustive requirements in the connection codes and decide on the application of the requirements on existing installations and on derogations, if any.

When it comes to the implementation of the Network, we also would like to highlight the need for a quick set-up of transparent Stakeholder Committees - prepared by ACER and ENTSO – in order to facilitate the EU monitoring the implementation of Codes & Guidelines at Member States and regional level. It is important to intensively involve DSOs throughout the entire implementation process. As system operators, DSOs will have to carry significant responsibilities for the successful implementation of the codes, and therefore need to be active participants in all stakeholder discussions. It is very important to develop similar structures at national /regional level with the involvement of all stakeholders, in particular DSOs and in coordination with European stakeholders committees.

At last, we believe - in terms of electricity Network Codes - that all main areas are covered by the Codes already drafted and that no new initiatives are required at the moment. The adoption and implementation should come first.



GEODE appreciates the Agency's monitoring activities such as providing support for the implementation of the IEM – e.g. through the 5th annual market monitoring report. GEODE is willing to contribute to this work.

REMIT is considered by GEODE as high priority and we welcome the work done and support the Agency monitoring wholesale energy markets and trading activities, increasing the level of trust in electricity and gas markets and thereby improving the reputation of all market actors, including DSOs.

Brussels, 18 June 2015