



GEODE POSITION ON ERGEG DRAFT GUIDELINES FOR GOOD PRACTICE ON ELECTRICITY GRID CONNECTION AND ACCESS

The European Regulatory Group for Electricity and Gas (ERGEG) has launched a Public Consultation on its paper “ Draft Guidelines for Good Practice on Electricity Grid Connection and Access” . **GEODE** welcomes the opportunity to contribute.

GEODE welcomes that ERGEG through this paper starts the process towards the development of framework guidelines of future network codes. GEODE totally supports Agency significant role on the development of network codes as it has been envisaged on the third energy package.

GEODE considers that electricity grid connection and access conditions is a key issue for distributors throughout Europe and agrees with ERGEG paper on the fact that further standardisation on procedures for grid connection and access is needed to avoid disturbances in the European electric power systems. At same time more coordination within TSO's is needed for the security of the European power system. GEODE would like to pay attention to the cost implications for system operators that the proposed Guidelines could represent and therefore cost benefit analysis should be considered to adopt measures practical an economic reasonable.

ERGEG concrete questions:

1.- Do you agree with the problems these GGP are trying to solve; are there other problems that should be addressed within grid connection and access not yet included in these guidelines?

GEODE agrees with the problems discussed by the GGP and the harmonisation proposed to avoid European power systems getting in danger when generation and consumption units trip from the system in an uncoordinated and uncontrolled manner due to different national requirements on voltage and frequency variations.

GEODE wants to point out that the problems identified by ERGEG 's paper will grow in future due to massive deployment of existing and new concepts including distributed generation, renewable energies and smart grids.

2.- Do these guidelines address the problem; will they lead to more transparent, effective and non-discriminatory grid connection and access?

GEODE's view is that these guidelines will contribute to more transparent, effective and non-discriminatory grid connection and access.

3.- Please outline your views on the description of the roles and responsibilities set out in section 3

GEODE agrees in general with the roles and responsibilities of market stakeholders described on section 3 of the GGP.



Among other issues, **GEODE** considers that national regulators should have the authority and the powers to require TSO's to modify terms and conditions for grid connection and access.

At the same time GEODE emphasises the significant importance of information transparency to be provided by TSO's to assure efficient and non-discriminatory access to the power system. National regulators as well as ERGEG-ACER should monitor carefully that transparency of information is in place.

4.- Are the technical framework and general provisions for generation, consumption and DSOs relevant and practical? Is there anything else that should be included/excluded?

GEODE considers that the technical framework proposed is relevant and practical.

5.- How would the implementation of these GGP affect your business / market; what would the impact be?

GEODE believes that the implementation of these Guidelines of Good Practice on Grid connection and access will significantly contribute to the security of European power system from a technical point of view, while at same time will facilitate to a certain extend market participants access to the grid, to the extent they are included in a grid code and become binding.

6.- Priority access

GEODE believes that the expansion of renewable generation will require significant investment in electricity networks, particularly of distribution networks, since these generation installations are frequently connected to DSO's networks and mainly in rural areas where existing grid could not have sufficient capacity. Therefore regulators should encourage investments by facilitating authorisation procedures and allocating appropriate remuneration to DSO's investing to improve their networks.

Barcelona, 2nd June 2009