



**GEODE COMMENTS ON EUROPEAN COMMISSION PUBLIC  
CONSULTATION ON THE ESTABLISHMENT OF THE ANNUAL PRIORITY  
LISTS FOR THE DEVELOPMENT OF NETWORK CODES AND GUIDELINES  
FOR 2013 AND BEYOND**

**GEODE**, the European association representing the interest of energy distribution companies welcomes the opportunity to provide comments on European Commission Public Consultation on the establishment of the annual priority list for the development of network codes and guidelines for 2013 and beyond.

**GEODE** supports the priorities proposed by the European Commission for 2013 in the Consultation document. We particularly emphasize the importance of prioritizing the work started in 2011 and 2012 as regards the developing of Network Codes both for Electricity and Gas by ENTSOE and ENTSOG.

**GEODE** also agrees with the Commission that the implementation of the second and third energy package provisions is essential together with the enhancement of investments in infrastructure.

Regarding the priority areas for 2013 that consist in the finalisation of the Guidelines and Network Codes that are currently in the drafting process, **GEODE** agrees with those suggested by the Commission. The deadline of 2014 for an integrated internal energy market is primarily relevant to the market related codes. Defining common operational security requirements relevant to cross-border market functioning is essential for development of the other technical codes and therefore should be given immediate priority. Consistency of Network Codes with related standards being developed by CEN/CENELEC bodies, in particular as regards Smart Grids M490, Smart Meters functionalities M440 and electric vehicles M468, should be assured to avoid overlapping.



Special attention should be given to e.g. system security standards to be developed that must be underpinned by rigorous economic assessment.

Rules on harmonised transmission tariff structures in electricity and gas, as well as guidelines for favouring cross-border trade of electricity and gas, are also important.

Regarding Network Codes and Guidelines beyond 2013, **GEODE** would support the development of Network Codes rather than Commission Guidelines as the process is more transparent and allows greater involvement of stakeholders, in particular of DSOs, that as network operators are entitled to a greater level of involvement in the drafting process with ENTSOE and ENTSG. Nevertheless all Network Codes should be accompanied by the corresponding economic impact assessment submitted to public consultation that justifies their need when modifying existing operational rules.

**GEODE** would like to underline that, in principle, Framework Guidelines and Network Codes should set minimum common standards in order to prevent situations that could have a negative impact exclusively on cross-border trade, and on the European system operation and security, while respecting the subsidiarity principle. The Network Codes should not go too deeply into detailed provisions nor go beyond cross-border issues. Framework Guidelines and Network Codes should be accompanied by the relevant Impact Assessments submitted to public consultation.

**GEODE** would like to take this opportunity to welcome the current level of involvement of DSOs in the drafting process of Network Codes with ENTSOE and ENTSG. DSOs have to be actively involved in the drafting process of the network codes, when there are provisions that affect distribution networks operation, as it has been demonstrated with the NC on grid connection and is also the case with other NCs being developed eg NC on DSO and industrial



load connection, and NC on operational security. The same will apply with the expected NC on third party access and the energy efficiency NC.

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