



## **GEODE COMMENTS ON ACER WORK PROGRAMME**

**GEODE**, the voice of local European energy distributors across Europe welcomes the opportunity to provide comments on ACER Work programme 2013. **GEODE** very much appreciates the initiative taken to present your work programme jointly with CEER's providing a wider view of the priorities needed.

**GEODE** supports the priorities proposed by ACER in the consultation document. We particularly support the importance of prioritizing the completion of the Network Codes related to the Framework Guidelines adopted in 2011 and 2012 both in electricity and gas.

Regarding Network Codes and Guidelines, **GEODE** would like to highlight the importance of intense involvement of stakeholders, in particular of DSOs, that as network operators are entitled to a greater level of participation in the drafting process with ENTSOE and ENTSOG.

**GEODE** would like to underline that, in principle, Framework Guidelines and in particular 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 that justifies their need when modifying existing operational rules. ACER should carefully look into these topics when providing its opinion on the Network Codes.

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.

**GEODE** also supports the ACER monitoring activities as essential.

The new tasks given to ACER both regarding REMIT and on the Regulation for trans-European energy infrastructure are also seen by GEODE of high priority.. 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.

Brussels, 27 July 2012