

JOINT ACER/ENTSO-E CONSULTATION

ROLE OF STAKEHOLDERS IN THE IMPLEMENTATION OF NETWORK CODES AND RELATED GUIDELINES, AND IN PARTICULAR THE ESTABLISHMENT OF EUROPEAN STAKEHOLDER COMMITTEES FOR NETWORK CODE IMPLEMENTATION

Enel welcomes the opportunity to participate to the consultation «Role of stakeholders in the implementation of network codes and related guidelines, and in particular the establishment of European Stakeholder Committees for network code implementation».

Even if in the last years European institutions have been developing the third energy package for the creation of the Internal Energy Market, the results are still far away in the future.

For this reason, it is time to accelerate the completion of the internal energy market with the introduction of network codes and guidelines. At the same time, these rules should adequately consider different stakeholders' interests. In order to obtain these two goals, it is important to implement a comprehensive governance reform.

In fact, until now, the definition of the network codes has been left to ENTSO-E, which in some cases have represented TSOs' interests. In some cases, network codes and guidelines presented to Comitology have been different from the framework guidelines previously defined by ACER. It is important to compensate this asymmetry through adequate Permanent European Stakeholders Committees (PESCs), which represent all stakeholders' interests. For this reason, generators (conventional and RES), DSOs, TSOs, customers, European Commission, ACER and other stakeholders (e.g. experts in secure telecommunication and data privacy, aggregators, etc...) must included in the PESCs. In addition, the three proposed PESCs (Market, operational, and connections) should be chaired by ACER and not ENTSO-E.

Furthermore, PESCs composition should reflect the fact that Europe is not homogenous. For example, in some Country DSOs are very large, have high levels, and has a lot of variable RES capacity installed on their grids, on the contrary, in other countries each DSO covers only the extension of few cities and has little/no expertise on how to manage a world that is shifting towards variable and distributed generation.

In conclusion, composition of the PESCs should be based on two dimensions: type of stakeholders and their characteristics; finally, the documents discussed/produced by the PESCs should be publicly available to all stakeholders.