



Publishing date: 22/09/2014

Document title:

We appreciate your feedback



Please click on the icon to take a 5' online survey
and provide your feedback about this document

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
29
30
31
32
33
34
35
36
37

Delivered to: consultation2014O01@acer.europa.eu
Agency for the Cooperation of Energy Regulators (ACER)

Opinion: European Energy Regulation: A Bridge to 2025

First of all, a lot of thanks to ACER of organising this important consultation.

This opinion represents an opinion of an individual citizen, not any legal entity.

This opinion does not contain:

- any business secrets
- any trade secrets
- any confidential information.

This opinion is public.

ACER can publish this opinion on a relevant web page.

Annex 1 holds information about previous consultations in the European Union level.

Annex 2 holds information about disclaimers and copyright.

With kind Regards,

Jukka S. Rannila
citizen of Finland

signed electronically

[continues on the next page]

38

39 General: Previous consultations

40

41 I gave earlier opinions to ACER, and PDF files of those opinions are on the following addresses:

42

43 EN: Opinion 34: REMIT Registration Format

44 http://www.jukkarannila.fi/lausunnot.html#nro_34

45

46 EN: Opinion 43: Publication of extracts of the European register of market participants

47 http://www.jukkarannila.fi/lausunnot.html#nro_43

48

49 EN: Opinion 53: Trade Reporting User Manual (TRUM) (Draft)

50 http://www.jukkarannila.fi/lausunnot.html#nro_53

51

52 (REMIT: Pursuant to Article 9(3) of Regulation (EU) No 1227/2011 of the European Parliament
53 and of the Council of 25 October 2011 on wholesale energy market integrity and transparency)

54

55 SO, in this Opinion there should be some new insights based on the European Energy Regulation
56 (Document: PC_2014_O_01) consultation document.

57

58 Limitation: Opinion of an individual customer (citizen) – not any legal entity

59

60 Since this opinion is an created by an individual customer (citizen), the knowledge base for this
61 consultation is naturally rather limited, since there has not been a group of experienced experts
62 writing this opinion.

63

64 Complying with current technologies

65

66 Sections 2.26-2.30 contain some critical thoughts about technological advances. At the current
67 situation we can note, that there can be different technological developments related to energy.

68

69 Therefore it can be noted, that there has to constant follow-up of technological advances, which
70 may require some legislative and/or governance.

71

72 Marketing energy efficiency to customers

73

74 There is some discussion about energy meters on the consultation document. Like said, energy
75 meters are part of having energy efficiency and possibly energy savings.

76

77 The problem with consumer marketing is getting the message through, and marketing to different
78 companies (and other legal entities) is easier.

79

80 In the previous consultations I have advocated creating of different figures, which give to
81 consumers a way of assessing different products.

82

83 The next figure is based on one attempt of having a simple message, which can be used with
84 different marketing operations.
85



86
87

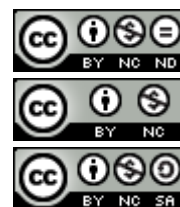
88 Another example is provided with the following figures.

89 Attribution-NonCommercial-NoDerivatives 4.0 International

90 Attribution-NonCommercial 4.0 International

91 Attribution-NonCommercial-ShareAlike 4.0 International

92



93 These licences can be chosen ¹ with simple selections, and there are different levels for explicating
94 the licences:

- 95 * figures
- 96 * simplified easy-to-read pages
- 97 * finally the long legal text.

98

99 In previous opinions I have advocated creating simplified figures and the three-level explanations
100 related to the application area of figures.

101

102 In previous opinions I have advocated constructing easy-to-read legal texts – may in levels.

103

104 **Proposal 1: For consumer marketing there could be different simplified figures to be**
105 **used with consumer marketing messages.**

106

107 **Proposal 2: For consumer marketing there could be easy-to-read (e.g. in three levels)**
108 **information related to energy usage.**

109

110 An example from ² Finland is KELA's project for improving readability of different forms and
111 texts. In other words, the complicated (legal) texts can be constructed with more simplified ways.

112

113 Like said, the consumer marketing is demanding, and marketing of energy efficiency and energy
114 savings for customers (citizens) can take years.

115

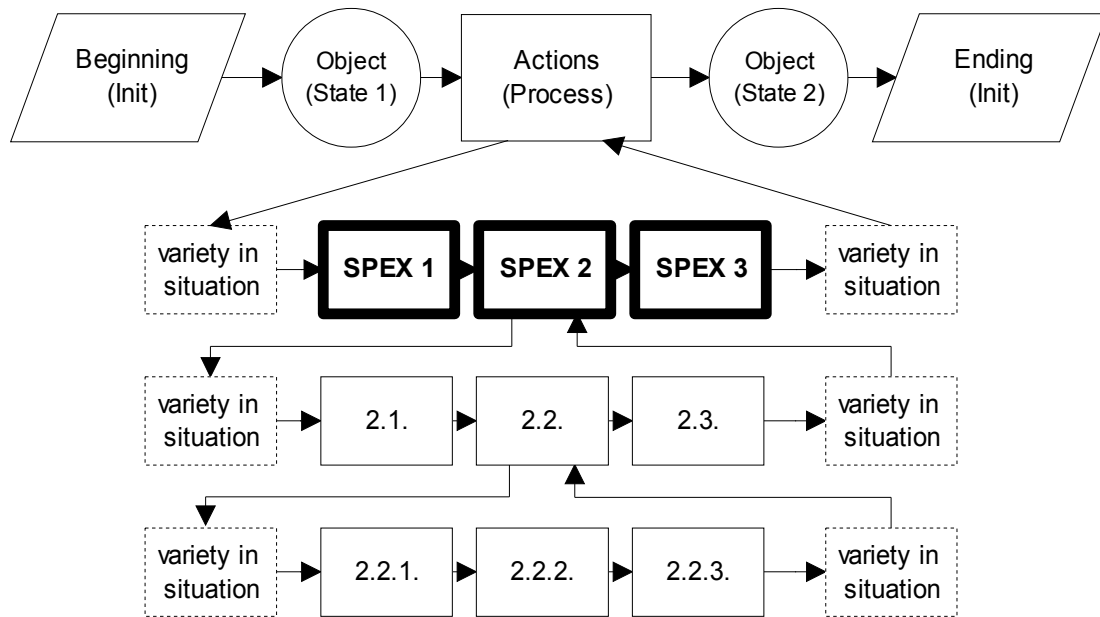
1 <http://creativecommons.org/choose/>, page for selecting a Creative Commons licence

2 http://www.kela.fi/hankkeet_selkeyshanke, In Finnish: creating more readable texts for customers

116 **Standardisation of interfaces for customers (citizens)**

117

118 In previous consultations I have advocated standardisation of interfaces. There are different
 119 processes (Beginning → Actions → Ending), which can be described in different levels of details.
 120



121

122

123 There can be highly detailed points in different processes (SPEX), which could be standardised.

124

125 **Proposal 3: There could be a project for modelling different customer (care) processes.**

126

127 **Proposal 4: Some parts of the customer (care) processes could be standardised for**
 128 **customer interfaces.**

129

130 **Proposal 5: Some standardised customer interfaces could be used for having better**
 131 **customer (care) processes in the European level.**

132

133 An example could be user-friendly interface (e.g. web page and/or mobile application) for energy
 134 consumption information, and the standardised interface could be the same for all energy providers.

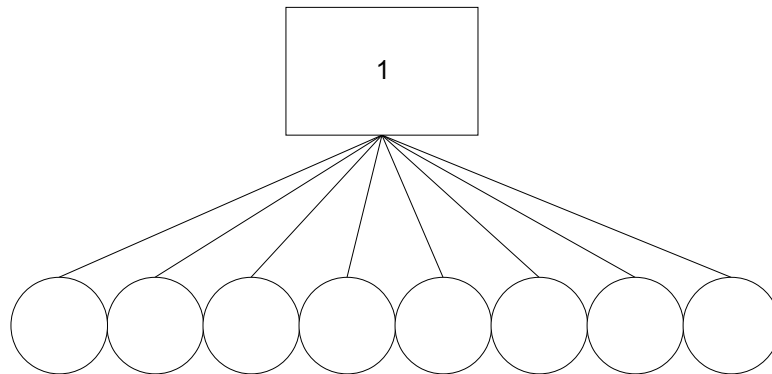
135

136 It can be noted, that different actors can naturally have other non-standardised interfaces for
 137 customer(s) (care), and there is nothing wrong with that approach.

138

139 Also, we have to assess the need for several customer (care) interfaces. In other words, different
 140 stakeholder groups need different interfaces, and energy (market) systems are not an exception of
 141 this situation.

142

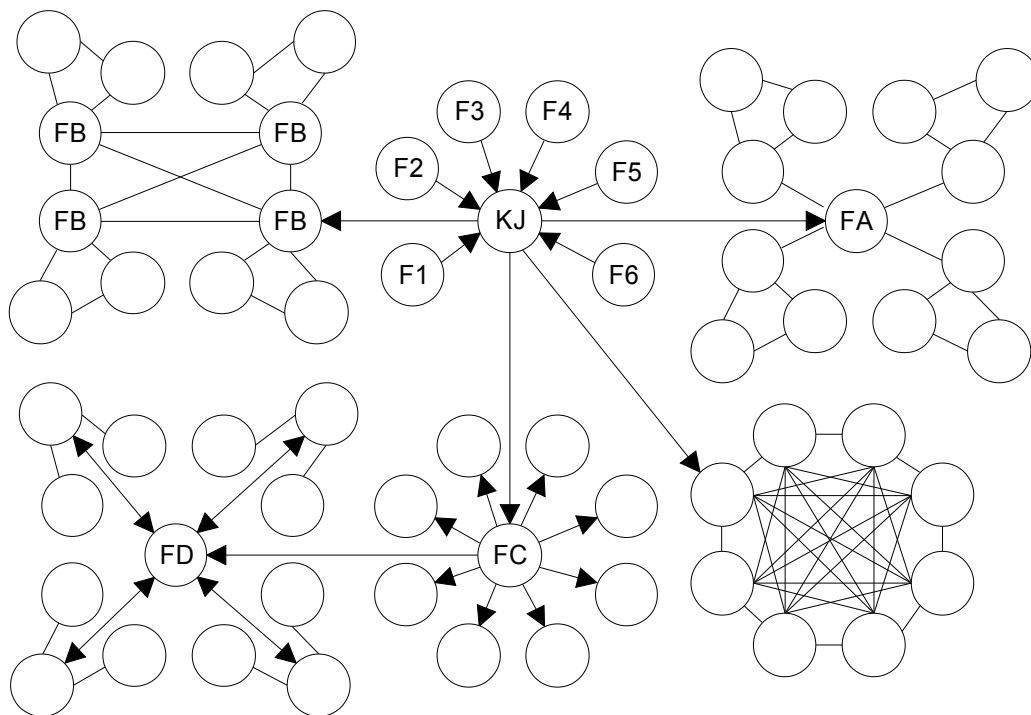


143
 144
 145
 146
 147
 148
 149
 150
 151
 152

Proposal 6: There could be a project for analysing the quality and the quantity of different interfaces for different stakeholder groups, e.g. customer as one group.

Naturally, there can be even tens of different user interfaces depending on the nature of different systems.

Layered systems



153
 154
 155
 156
 157
 158

In some previous consultations I have presented the figure above. In practical reality, there are different systems, which use very different standards/formats for cooperation between different systems.

159 There are a lot of different standard setting organisations (SDO), and one comprehensive list is
 160 provided ³ for us by ConsortiumInfo.org. Examples are naturally different XML documents and
 161 CSV documents.

162

163 **Proposal 7: ACER could systematically assess existing standard setting organisations**
 164 **(SDO) and assess standards provided by those communities.**

165

166 Like said in the previous consultations, there should not be redundant standardisation.

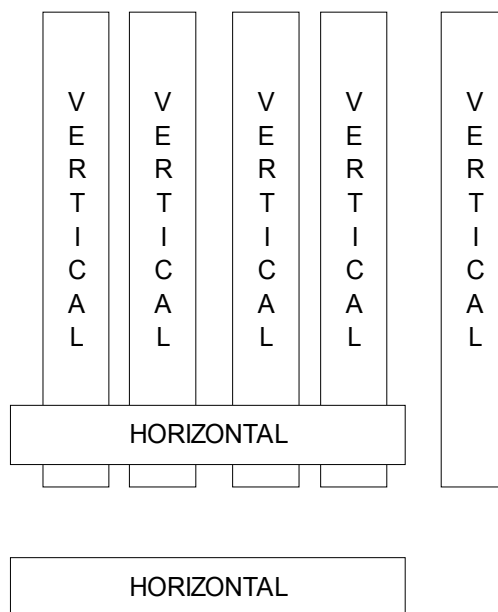
167

168 **One theme: horizontal standards and vertical standards**

169

170 One of the main themes can be division standards: horizontal standards and vertical standards. What
 171 this means? Generally speaking, different ICT solutions will implement a large collection of
 172 different standards: open standards and closed standards. In many cases, different ICT solutions do
 173 not work together and this might not constitute a problem. However, in many cases different ICT
 174 solutions has to work together seamlessly – possibly without further problems.

175



176

177

178 **Proposal 8: ACER could collect all relevant information about horizontal standards.**

179

180 **Proposal 9: ACER could collect all relevant information about vertical standards.**

181

182 **Proposal 10: There could be separation of horizontal standards and vertical standards.**

183

184 It can be said, that in some point there will be need for horizontal standardisation. This means, that
 185 several vertical systems can cooperate in different levels. The general development is, that there can

³ <http://www.consortiuminfo.org/links/linksall.php>, Standard Setting Organizations and Standards List

186 be several vertical solutions for the same computerisation area. An example for this standardisation
187 is the email standard (horizontal), when there are numerous email systems (vertical) created with
188 very wide variety of technologies.

189

190 **Proposal 11: There could be different standardisation efforts related to horizontal**
191 **standards and vertical standards.**

192

193 **Proposal 12: Developing horizontal standards should favoured in the development of**
194 **new and/or revised standards.**

195

196 **Example of standards / Different information feeds**

197

198 In the previous consultations I have used RSS feeds as an example.

199



200

201

202 To be precise, there are some standards for RSS feeds: RSS 2.0⁴ standard and Atom^{5 6} standards.

203 There are different systems, which comply with these example standards (RSS and Atom)
204 differently.

205

206 It can be said, that there is need for different information feeds between different systems. Like said
207 before, ACER can assess different existing standards in order to avoid redundant (even useless)
208 standardisation.

209

210

211 **Good luck!!!**

212

213 This opinion is quite limited. Hopefully there are constructive ideas presented in other opinions.

214 This remains to be seen.

4 <http://www.rssboard.org/rss-specification>,

5 <http://tools.ietf.org/html/rfc4287>, The Atom Syndication Format

6 <http://tools.ietf.org/html/rfc5023>, The Atom Publishing Protocol

215
216
217
218
219
220
221
222
223
224
225
226
227
228
229
230
231
232
233
234
235
236
237
238
239
240
241
242
243
244
245
246
247
248
249
250
251
252
253
254
255
256
257
258
259

ANNEX 1

My opinions to the previous and relevant consultations – there consultations were mostly organised by the Commission of the European Union. General page to all consultations – both in English and in Finnish: <http://www.jukkarannila.fi/lausunnot.html>

EN: Opinion 1: Review of the rules on access to documents

http://www.jukkarannila.fi/lausunnot.html#nro_1

EN: Opinion 2: Schools for the 21st Century

http://www.jukkarannila.fi/lausunnot.html#nro_2

EN: Opinion 3: The future of pharmaceuticals for Human use in Europe- making Europe a Hub for Safe and Innovative medicines

http://www.jukkarannila.fi/lausunnot.html#nro_3

EN: Opinion 5: Consumer Scoreboard, Questionnaire for stakeholders

http://www.jukkarannila.fi/lausunnot.html#nro_5

EN: Opinion 6: Consultation on a Code of Conduct for Interest Representatives

http://www.jukkarannila.fi/lausunnot.html#nro_6

EN: Opinion 8: European Interoperability Framework, version 2, draft

http://www.jukkarannila.fi/lausunnot.html#nro_8

EN: Opinion 9: CAMSS: Common Assessment Method for Standards and Specifications, CAMSS proposal for comments

http://www.jukkarannila.fi/lausunnot.html#nro_9

EN: Opinion 15: Collective Redress

http://www.jukkarannila.fi/lausunnot.html#nro_15

EN: Opinion 17: Opinion to Antitrust Case No. COMP/C-3/39.530

http://www.jukkarannila.fi/lausunnot.html#nro_17

EN: Opinion 18: Opinion Related to the Public Undertaking by Microsoft

http://www.jukkarannila.fi/lausunnot.html#nro_18

EN: Opinion 19: Official Acknowledgement by the Commission

http://www.jukkarannila.fi/lausunnot.html#nro_19

- 260 EN: Opinion 20: SECOND Opinion Related to the Public Undertaking by Microsoft
261 http://www.jukkarannila.fi/lausunnot.html#nro_20
262
- 263 EN: Opinion 21: Opinion about the European Interoperability Strategy proposal
264 http://www.jukkarannila.fi/lausunnot.html#nro_21
265
- 266 EN: Opinion 23: Public consultation on the review of the European Standardisation System
267 http://www.jukkarannila.fi/lausunnot.html#nro_23
268
- 269 EN: Opinion 27: Public Consultation on the Modernisation of EU Public Procurement Policy
270 http://www.jukkarannila.fi/lausunnot.html#nro_27
271
- 272 EN: Opinion 28: Consultation on the Europe 2020 Project Bond Initiative
273 http://www.jukkarannila.fi/lausunnot.html#nro_28
274
- 275 EN: Opinion 30: Internet Filtering
276 http://www.jukkarannila.fi/lausunnot.html#nro_30
277 NOTE: Organised by the European Committee for Standardization (CEN) ⁷
278
- 279 EN: Opinion 32: COMP/C-3/39.692/IBM – Maintenance services
280 http://www.jukkarannila.fi/lausunnot.html#nro_32
281
- 282 EN: Opinion 34: REMIT Registration Format
283 http://www.jukkarannila.fi/lausunnot.html#nro_34
284 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER) ⁸
285
- 286 EN: Opinion 35: Exploiting the employment potential of the personal and household services
287 http://www.jukkarannila.fi/lausunnot.html#nro_35
288
- 289 EN: Opinion 37: CASE COMP/39.654 - Reuters instrument codes
290 http://www.jukkarannila.fi/lausunnot.html#nro_37
291
- 292 EN: Opinion 39: Registry options to facilitate linking of emissions trading systems
293 http://www.jukkarannila.fi/lausunnot.html#nro_39
294
- 295 EN: Opinion 40: Media Freedom and Pluralism / audiovisual regulatory bodies
296 http://www.jukkarannila.fi/lausunnot.html#nro_40
297
- 298 EN: Opinion 41: AT.39398: observations on the proposed commitments
299 http://www.jukkarannila.fi/lausunnot.html#nro_41
300
- 301 EN: Opinion 42: Opening up Education
302 http://www.jukkarannila.fi/lausunnot.html#nro_42

7 <http://www.cen.eu/> (Accessed 2 July 2012)

8 <http://www.acer.europa.eu/> (Accessed 2 July 2012)

303

304 EN: Opinion 43: Publication of extracts of the European register of market participants

305 http://www.jukkarannila.fi/lausunnot.html#nro_43

306 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)

307

308 EN: Opinion 44: Evaluation policy guidelines

309 http://www.jukkarannila.fi/lausunnot.html#nro_44

310

311 EN: Opinion 45: About ICT standardisation

312 http://www.jukkarannila.fi/lausunnot.html#nro_45

313

314 EN: Opinion 46: Review of the EU copyright rules

315 http://www.jukkarannila.fi/lausunnot.html#nro_46

316

317 EN: Opinion 51: European Area of Skills and Qualifications

318 http://www.jukkarannila.fi/lausunnot.html#nro_51

319

320 EN: Opinion 52: Trusted Cloud Europe Survey

321 http://www.jukkarannila.fi/lausunnot.html#nro_52

322

323 EN: Opinion 53: Trade Reporting User Manual (TRUM) (Draft)

324 http://www.jukkarannila.fi/lausunnot.html#nro_53

325 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)

326

327 My opinions to the previous and relevant consultations – there consultations were mostly organised

328 by the Commission of the European Union. General page to all consultations – both in English and

329 in Finnish: <http://www.jukkarannila.fi/lausunnot.html>

330

331

332

333 [Continues on the next page]

334

335

336

ANNEX 2

337 DISCLAIMERS

338

339 Legal disclaimer:

340 All opinions in this opinion paper are personal opinions and they do not represent opinions of any legal entity I am
341 member either by law or voluntarily. This opinion paper is only intended to trigger thinking and it is not legal advice.

342 This opinion paper does not apply to any past, current or future legal entity. This opinion paper will not cover any of the
343 future changes in this fast-developing area. Any actions made based on this opinion is solely responsibility of respective
344 actor making those actions.

345

346 Political disclaimer:

347 These opinions do not represent opinions of any political party. These opinions are not advices to certain policy and
348 they are only intended to trigger thinking. Any law proposal based on these opinions are sole responsibility of that legal
349 entity making law proposals.

350

351 These opinions are not meant to be extreme-right, moderate-right, extreme-centre⁹, moderate-centre, extreme-left or
352 moderate-left. They are only opinions of an individual whose overall thinking might or might not contain elements of
353 different sources. These opinions do not reflect past, current or future political situation in the Finnish, European or
354 worldwide politics.

355

356 These opinions are not meant to rally for a candidacy in any public election in any level.

357

358 Content of web pages:

359 This text may or may not refer to web pages. The content of those web pages is not responsibility of author of this
360 document. They are referenced on the date of this document. If referenced web pages are not found after the date when
361 this document is dated, that situation is not responsibility of the author. All changes done in the web pages this
362 document refers are sole responsibility of those organisations and individuals maintaining those web pages. All illegal
363 content found on the referred web pages is not on the responsibility of the author of this document, and producing that
364 kind content is not endorsed by the author of this document.

365

366 Use of broken English

367 This text is in English, but from a person, whose is not a native English-speaking person. Therefore the text may or may
368 not contain bad, odd and broken English, and can contain awkward linguistic solutions.

369

370 COPYRIGHT

371

372 This opinion paper is distributed under Creative Commons licence, to be specific the licence is "Attribution-
373 NonCommercial-NoDerivatives 4.0 International (CC BY-NC-ND 4.0)". The text of the licence can be obtained from
374 the following web page:

375 <http://creativecommons.org/licenses/by-nc-nd/4.0/>

376 The English explanation is on the following web page:

377 <http://creativecommons.org/licenses/by-nc-nd/4.0/legalcode>

378

379

380



9 Based on the Finnish three-party system there is a phenomenon called extreme-centre in Finland. The 2011 parliamentary elections in Finland challenge the three-party system, since three "old" parties were not traditionally as the three largest parties. The is now a "new" party as the third largest party. We all must remain being interested about this new development in Finland.



Publishing date: 22/09/2014

Document title:

We appreciate your feedback



Please click on the icon to take a 5' online survey
and provide your feedback about this document