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Public consultation paper (PC_2014_O_01) – A bridge to 2025 European Energy Regulation

Comments of SUDGAZ on the points 3.31 – 3.35 (Role of DSO's):

- **3.34:** If services that are currently provided by gas DSO's should be provided within competitive markets, you must pay attention that this does not have a negative impact on the gas distribution security, e.g. on-call duty, connection with the grid, installing gas meter, checkup of gas installation of the consumer etc.

A small gas DSO, active at regional level, is best-known to his customers and is the best information source and contact for natural gas. If services currently provided by gas DSO's are deregulated, customer will lose overview and confidence what will be unfavorable to natural gas, which is in competition with other energies. Today's customer wishes to have all services concentrated in one hand. Therefore a gas company, where sales and distribution are not yet unbundled, because it serves less than 100,000 connected users, is the ideal partner for customers.

- **3.35:** We do not agree with your statements to reduce the limit of actually 100,000 connected customers and to consolidate distribution systems for improving interactions between DSO and TSO. We think that even a small network of a DSO, which is directly connected to a network of a TSO, must be exempted from regulation, because in this case the DSO has active interactions with the TSO, which are covered by contracts. If the DSO's of a region are consolidated the competitiveness will be lost. In Luxembourg the three DSO's compete with each other for who is the best and the most efficient. Nevertheless the three DSO's work together on several levels and interchange their know-how in order to improve the services to customers. We suggest not to push the consolidation of distribution systems when they are connected directly to a transport network, but to stimulate the interactions between DSO and TSO.

Esch/Alzette, Luxembourg, 16 June, 2014

Jean-Marie FEY
directeur

A handwritten signature in blue ink, appearing to be "J.M. Fey", written over a stylized graphic element that resembles a compass rose or a star.



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