



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

ACER
Agency for the Cooperation of
Energy Regulators
Trg Republike 3
1000 Ljubljana
Slovenien

Recht und
Regulierungsmanagement
Rechtsanwältin Kahle
Telefon: 0211/821-2289
Telefax: 0211/821-772289
kkahle@swd-ag.de
16.06.2014

advance by mail

**ACER Consultation “European Energy Regulation: A Bridge to 2025“:
Opinion of Stadtwerke Düsseldorf AG**

Dear Ladies and Gentlemen,

Stadtwerke Düsseldorf AG welcomes the opportunity to participate to ACER's public consultation "Europe - an energy regulation: a bridge to 2025" on April 29, 2014. Stadtwerke Düsseldorf AG very much appreciates that stakeholders are invited to participate in the debate on the adequate European regulatory framework in the medium and long term.

Stadtwerke Düsseldorf AG is a public utility and supplies more than 500,000 private and industrial customers in Düsseldorf and the surrounding area. Our company has a strong growth strategy.

In 2007, the network operation of the Stadtwerke Düsseldorf AG has been spun off due to the Unbundling-legislation and “Stadtwerke Düsseldorf Netz GmbH” was founded. Since April this year, the company operates under “Netzgesellschaft Düsseldorf mbH” (NGD).

The distribution system operator NGD ensures that each customer in Düsseldorf can choose between suppliers without any discrimination. There haven't been any complaints from customers in the last few years. Current regulations guarantee non-discriminatory network operation at any time and allows each customer to be free to choose their supplier. A compliance officer proofs the processes at Stadtwerke Düsseldorf AG and ensures equal treatment of all suppliers.

In the light of the fundamental changes witnessed by the energy sector in Europe, a well-balanced set of policy instruments is and will be needed in order to achieve a continued secure, sustainable and affordable supply with electricity and gas for Europe's customers and industries. However, in the short term the top priority must remain the timely and full implementation of existing legislation, in particular the Third Energy Package.

Aufsichtsratsvorsitzender:
Dr. Bernhard Beck
Vorstand:
Dr. Udo Brockmeier (Vorsitzender)
Hans-Günther Meier
Rainer Pennekamp

Sitz der Gesellschaft: Düsseldorf
Rechtsform: Aktiengesellschaft
Eingetragen beim Amtsgericht Düsseldorf
HRB Nr. 3466

Stadtwerke Düsseldorf AG
Höherweg 100
40233 Düsseldorf

Zentrale (0211) 821 0
Service (0211) 821 821

Telefax (0211) 821 3 821

E-Mail info@swd-ag.de
Internet www.swd-ag.de

Stadtsparkasse Düsseldorf
Kto-Nr. 100 124 33, BLZ 300 501 10
IBAN DE66 3005 0110 0010 0124 33,
SWIFT/BIC-Code: DUSSEDE3333
Gläubiger-ID: DE7700000000005373

Postbank Essen
Kto-Nr. 407 432, BLZ 360 100 43

und alle Düsseldorf Bank
USt. ID. Nr. DE 811365006

In Germany, the legislation has been adjusted according to the requirements of the second and third internal energy market package in the years 2005 and 2011. Finally, the requirements were tightened to the accounting and operational unbundling in particular. Thus, since 2011 the network operator have to ensure that a likelihood of confusion between the network operator and sales activities of the vertically integrated company shall be excluded. For this reason, this year a restructuring of the network company took place to differ itself from the sales activities of Stadtwerke Dusseldorf AG.

As far as we are informed, there are comments regarding "Europe-an energy regulation: a bridge to 2015" from BDEW and VKU. We do support these comments and we are convinced, that there is no need to establish an ownership unbundling for DSO`s.

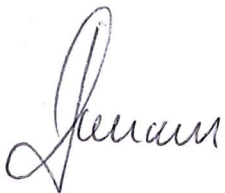
Beside the comments, there is one point, we like to stress:

NGD operates not only as an electricity- and gas network provider but even as a heat - and water network provider. So NGD is the network operator for all utility grids regardless if legal unbundling applies or not. The company has organized a work flow which enables all departments at NGD to work integrated in all these grids. This means that planing, operating and managing is hold in one hand for all these networks. This integrated work creates many benefits for all customer in Düsseldorf without disciminating any other supplier.

We are strongly concerned that all these benefits could get lost in future.

If you need further information regarding this point, please do not hasitate to contact us.

regards
Stadtwerke Düsseldorf AG



ppa. Hermanns



i.A. Kahle



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