

Paris, November 5 th 2009

EUROPEAN ENERGY REGULATORS
CONSULTATION ON THE 2010 WORK PROGRAMME
ERDF's ANSWER

ERDF, as French distributor, makes the following answer to the public consultation launched by the European energy regulators.

The answer is made according to the frame proposed in the document.

1- **How do you assess our general approach and objectives?**

The objectives are clearly defined through the 7 key areas mentioned on page 5. These priorities are in accordance with the policies of the EU, and particularly :

- The implementation of the 3rd package
- The climate change issues
- The consumers issues

This programme seems to be ambitious; however, the “key areas” are permanent concerns, which have to be considered on a long run.

In order to implement all these objectives, it is essential that all the stakeholders are involved in the work programme.

In particular, we would like to highlight the fact that the European Distributors have a major role in most of these objectives, because they are essential players, in the front line for the opening of the market, for the relationship with the customers, as well for the optimization of the electricity demand.

2- **Do you consider that deliverables we have proposed are an adequate means to reach our key objectives ?**

ERDF makes one remark:

The programme seems not to include any work on DSM.

Nevertheless, this concern seems to be a very important issue in order to reach the objectives of the EU: climate change, energy efficiency, consumers satisfaction.

In this field, European Distributors could often, in many countries where the general regulatory framework is convenient, play a specific role in a global DSM , let's say “DSM for everybody”.

Some adaptations to the present regulations could be necessary in order to make this involvement easier, and really efficient, without any competition with the suppliers or energy services providers, but rather as complement.

We propose a specific workshop for this topic.

3- Please indicate the deliverables you consider as “very important”, “important” or “not important”.

a) Very important:

- Advice on intelligent energy networks (smart grids)
- CEER status review of the implementation of the climate and energy package.
- ERGEG Guidelines of good practice on regulatory aspects of smart metering for electricity (and gas).
- ERGEG compliance monitoring report on the implementation status of DSO unbundling.
- Status review of the liberalisation and implementation of the energy regulatory framework.
- New proposal: DSM and regulation.

b) Important:

- CEER guidelines of good practice and harmonised surveys on quality of electricity supply.
- Guidelines of g.p. on customer complaint handling for services providers and third-party bodies.
- Status review on end-user price regulation as of 1st January 2010.

c) Less important:

The others

4- For the deliverables with consultations or hearings, do you intend to actively participate ?

Yes, particularly for the “very important” and “important” deliverables (see above).

5- Do you have any specific comments on any of the individual deliverables ?

No.