



European Federation of Local Energy Companies
Confédération Européenne des Entreprises Locales d'Énergie

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CEDEC POSITION PAPER

European Energy Regulators Draft 2010 Work Programme

An ERGEG Public Consultation Document

General observations

CEDEC defends, at European level, the interests of local energy companies. Through its members - among which VKU (Germany), Federutility (Italy), ANROC, FNCCR, FNSICAE and ELE (France), Intermixt and Inter-Regies (Belgium) - CEDEC represents 1500 companies with a total turnover of about 100 billion Euros and more than 250.000 employees.

The predominantly medium-sized local energy companies have developed activities as electricity and heat producers, electricity and gas distribution system operators and suppliers, and are of considerable importance for regional economic development.

Answers on consultation questions

Please indicate the deliverables you consider as "very important", "important" or "not important".

CEDEC considers the following deliverables as "very important":

- . The 3rd Package
- . Affordability and Consumer Issues
- . The Climate and Energy Package

Deliverables for which CEDEC estimates as "important" are :

- . Financial services
- . Regional Market Integration

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

CEDEC intends to actively participate at consultations and hearings concerning the deliverables "Third Package", "Affordability and Consumer Issues" and "The Climate and Energy Package" and probably also in "Financial services" and "Regional Market Integration", that are key areas of work in 2010.

Do you have any specific comments on any of the individual deliverables?
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The 3rd Package foresees the establishment of guidelines (framework guidelines) and network codes (network guidelines) in close collaboration between the Agency, the European Commission, ENTSO-E and ENTSO-G.

CEDEC estimates that the consultation procedure of the stakeholders should assign a specific role to the DSO's, who are not only *users* of transmission networks, but also *operators* of distribution networks.

Besides, the Third Package highlights the rights of **consumers** at the European Community level concerning the communication of consumption data, the mode of billing and the definition of vulnerable consumers.

The accuracy, transparency, comparability and appropriate level of detailed information are objectives to which CEDEC wishes to pay special attention.

Finally, CEDEC feels it is important that the field of action "**regional market integration**" verifies that the regulation of each EU-country is well coordinated.
