



Schweizerische Eidgenossenschaft
Confédération suisse
Confederazione Svizzera
Confederaziun svizra

Swiss Confederation

Federal Electricity Commission ElCom
Technical Secretariat

CH-3003 Bern, ElCom, slw

A-PRIORITY

Mrs Fay Geitona
CEER Secretary General
Rue le Titien 28
BE – 1000 Brussels

Also per e-mail: wind@ceer.eu

Our reference: 932-10-001 / 003858784
Your reference: C09-PC-43 / C09-SDE-14-02a
Contact person: slw
Bern, 17 February 2010

**CEER Consultation C09-PC-43
Regulatory aspects of the integration of wind generation in European electricity markets (Ref:
C09-SDE-14-02a, 10 December 2009)**

Dear Mrs. Geitona

We appreciate the work done by the CEER Sustainable Development Task Force and we support the sustainable development of the electric power markets along the general views of CEER, ERGEG, the European Union and the European Commission.

Wind generation projects foreseen by the EU or several of its Member States will affect electricity flows throughout Europe and will have an impact on balancing capacities and congestions. We therefore take the opportunity to give below some short comments to CEER document.

Market implications (Questions 2, 3 and 4)

Switzerland has only marginal wind power infeed in its national or local network. Nevertheless we see an increasing effect on our market of weather-driven electric power from abroad. The increased volatility of such power flows is leading to more complex grid operation procedures with stronger network constraints and higher balancing demand. The well developed interconnections on the Northern border of Switzerland to Germany and France and Austria enable Switzerland to provide substantial support to solve the problems caused by unpredictable wind power generation into the northern European grid and ensure operational safety.

Grid security would certainly also be increased by moving the gate closure time towards real-time and introducing cross-border balancing. The cross-border congestion management on the Northern border

Federal Electricity Commission ElCom
Effingerstrasse 39, CH-3003 Bern
Tel. +41 31 322 58 33, Fax +41 31 322 02 22
info@elcom.admin.ch
www.elcom.admin.ch



and the network operation safety guard functions provided by the Swiss TSO Swissgrid are going in this direction. The network, the installed generation and the pump capabilities in Switzerland are operating already as a kind of buffer towards South markets not yet operating as close to real-time as in most Northern markets.

R&D (Question 6)

Switzerland is already engaged in R&D activities to address issues related to large share of unpredictable electricity generation. If R&D costs, or part of them, are covered within grid tariffs we believe that it must be transparently declared towards the consumers and that a great share of the costs should be borne by industry and service providers. It should be left to NRAs to decide if, and which, R&D costs should be considered within regulated tariffs. The results of R&D directly or indirectly supported through tariffs or public funding should be publicly available.

Network charges, infrastructure (Questions 7 and 8)

The methodology for development of network charges and infrastructure should be handled the same way as with other generators to guarantee a non discriminatory regime on the power market. Incentives or penalties to support the EU 20/20/20 targets, including locational signals, should consider all issues related to climate change and would better be discussed on the ministerial level rather than by regulators. The supergrid infrastructure is a multinational issue including nations outside the EU and we think that this task should be addressed by a new separate body composed of EU-member states and non-member states.

Regional Initiatives (Question 11)

The discussion on infrastructure development or on other issues is in our opinion effective on regional level considering that regions are defined functionally and not politically. Switzerland has therefore already started a process of closer cooperation with the Central West region to develop market integration and security aspects.

We thank you for the opportunity of CEER consultation and look forward to further fruitful discussions.

Kind Regards

Federal Electricity Commission EICom

Renato Tami
Director

Michael Bhend
Head of Section Networks and Europe