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To

Una Shortall <Una.Shortall@ceer-eu.org>

cc

richard.knight@rolls-royce.com

Subject

Re: European Regulators have launched a public consultation on Guidelines for Good Practice on Transparency in Electricity Markets - deadline for receipt for comments is 10 May 2006

Dear Mrs Shortall,

AS coordinator of the ELEP project (www.elep.net) Working Group on Interconnection procedures and standardisation and co-author of the WP2 deliverable on Connection charging, I would like to make a basic comment which directly related to the proposed boundaries of the ERGEG Guidelines.

While there is clearly scope for better information management and transparency in wholesale electricity markets, the same can be said of electricity markets as a whole. In particular the level of transparency for new generators is appalling in most EU Member States. It is the ultimate responsibility of European regulators to ensure that fair, transparent and non-discriminatory rules apply to decentralised generators, who represent a growing share of the EU's generation portfolio. A first step into the right direction would be to make all relevant rules available on a "one-stop shop" model, as often these are not made available. Strictly defined interconnection procedures are also vital to project developers, who without them are often forced to enter direct bilateral negotiations with local grid operators, in which they suffer from the asymmetry of information.

I have attached to this message the latest deliverables from the ELEP project dealing with these issues and hope that they will foster discussion of these issues within ERGEG and/or CEER. Our activities have highlighted the best practice already in place in countries such as the UK, Ireland or Belgium on these vital issues. We believe that ERGEG and CEER are the right fora in which these best practices are to be discussed and promoted. There is a general concern in the decentralised generation world that the issues that directly impact the development of the sector are not being taken into consideration at present, although these barriers (lack of transparency and fair charging mechanisms) are clearly hampering the deployment of significant generation capacities across Europe.

It is now time for European regulators to put an end to serious abuses of dominant power and distortions to the Internal Energy Market !

Best regards,

Thomas Bouquet