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Subject: Regional Markets

Dear Ms Shortall,

in the VDN - the German Association of Network Operators, which represents some 400 members including all 4 German TSOs and almost 390 German DSOs which among them operate 95% of all German transmission and distribution circuits - we have read the ERGEG draft on regional markets with great interest. Since the on-going integration of the European power markets is proceeding along regional lines in many parts of Europe, this topic is certainly of great current relevance.

We believe that the European Commission and especially the regulators of the 25 European Member States need to be very careful in dealing with regionalization: On one hand, closer cooperation with neighbouring regulators seems very important. On the other hand, the longer-run goal of an integrated market covering the entire EU must not be compromised by too many, too different regional co-operations that may later prove especially hard to harmonise.

With that basic understanding, we have formulated a fairly large number of detailed comments on the ERGEG paper. But we were glad to read that UCTE has already commented to ERGEG on just about all the points that we formulated.

In addition to the general evaluation and basic understanding outlined above, we therefore fully support the detailed UCTE comments.

Sincerely,

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