

Dear Sir or Madam,

Thank you for giving us the opportunity to comment the discussion paper “2020 vision for Europe’s energy customers”.

Basically, we agree with the identified key principles of customer expectations

- Affordability,
- Reliability,
- Simplicity,
- Protection and empowerment.

However, we would like to take that opportunity to comment the 2020 visions that needs to be taken into account.

Affordability

Today, two-thirds of the prices for electricity and natural gas in Germany are controlled and regulated by NRA and antitrust agencies. If additionally the last third is controlled by the NRA the energy market is no more competitive. Like in every other market liberalisation involves chances and risks for market players - this is reflected in prices.

Reliability

Reliability is warranted by the network operators (TSOs + DSOs). It is the regulators topmost responsibility to ensure that network operators are able to manage their infrastructure in a safe and reliable way.

Simplicity

The complexity we find today in business processes is a consequence of NRA intervention in the energy market. Today we find much more market players than it was a couple of years ago. Information data must be exchanged between market roles in difficult communication processes – so finally complexity is caused by liberalisation.

Complexity in energy bills is a result of legal requirements. § 40 of the German Energiewirtschaftsgesetz lists the items which must be involved in the energy bill. The result of these legal requirements leads to a very complex energy bill that most customers do not understand.

Protection and empowerment

We agree that customer rights must guaranteed and delivered without any restrictions. In Germany customer rights are observed and assured by governmental and non-governmental organisations. Based on the positive expectations we made in Germany we do not see any improvement if further authorities become integrated in these sophisticated system.

Up to now, we have the experience that the majority of our customers is not interested in an active control of energy consumption and is not willing to pay for the additional investment to be made. The installation of infrastructure to implement active consumption control and market participation will generate high costs which finally must be paid by the customer.

Yours sincerely

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