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A-PRIORITY

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Also per e-mail:
Regional_Initiatives_Strategy_Paper@ergeg.org

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EREGG Consultation E09-PC-41
Draft strategy for delivering a more integrated European market – The role of the Regional Initiatives (Ref: E09-RIG-04-03, 9 November 2009)

Dear Mrs. Geitona,

We are grateful for the opportunity to comment on the draft EREGG strategy concerning the role of Regional Initiatives and would like to comment on a few fundamental aspects of the regional initiatives.

Switzerland planned and installed its infrastructure quite some time ago, long before the initiation of the liberalisation process within the EU, and in doing so it consistently focused on the needs of the relevant European markets. In view of its central European location and the considerable potential for pump storage power plants, it installed cross-border transmission capacities of 25,000 MW, which is equivalent to 250 percent of domestic consumption or approximately one-fifth of the cross-border transmission capacities in continental Europe. Since 2009, Switzerland has possessed a legal framework that is equivalent to that of EU energy legislation, guarantees third-party access and simplifies co-ordination with neighbouring states and regions.

Switzerland therefore primarily orients itself on the needs and options in the Central West and Central East regions, and for reasons of supply security alone cannot only act within the scope of Central South region. From the point of view of EICom, the legal framework created by the EU to date for establishing regions is proving to be inadequate for ensuring the effi-

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cient use of the existing infrastructure and developing the historically evolved markets as effectively as possible.

The further development of the regions should promote the integration of national and regional markets. In the view of EICom, cooperation should be based on economic needs and physical circumstances rather than on formal criterion. The allocation by the EU of the border between Germany and Switzerland to the Central South region, for example, is proving to be unsuitable and represents an obstacle to co-operation between the involved countries. In order to secure efficient and stable network operation, it is essential that co-operation and exchange take place, in particular with the Central West region.

For EICom it is therefore clear that the sustainable and continued development of the infrastructure and the markets at both the regional and the European levels can only take place with the adequate integration of, and in co-operation with, Switzerland – whether at the ministerial, regulatory or TSO level.

Yours sincerely,

Federal Electricity Commission EICom

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