



GEODE welcomes CEER's 2013 Work Programme and thanks CEER for this opportunity to contribute with our views on the work priorities for the next year. GEODE very much appreciates the initiative taken to present your work programme jointly with ACER's providing a wider view of the priorities needed.

GEODE particularly welcomes the regulators' intention to continue to prioritise retail markets including smart meters roll-out. Both smart meters and smart grids deployment constitute a priority for **GEODE** since they require significant involvement from DSOs. **GEODE** places special importance on CEER's focus on customer empowerment as we fully support your vision that customers involvement is a priority for the success of this process. **GEODE** would like to actively contribute to CEER's work on the work in relation to customers and distribution system operators interaction.

As regards the announcement of CEER work on "DSO unbundling", as part of your market monitoring activity, **GEODE** confirms its willingness to cooperate with CEER on this work at the earliest opportunity.

GEODE is also particularly interested in the work proposed on data management, energy infrastructure, following the Commission's legislative proposal, and on energy efficiency, as well as any activities relating to the completion of the energy internal market.

Finally GEODE would like to suggest as an important topic that might be included in your work programme, further work on tariff structure design. In our view, to ensure necessary grid investments are realised in time to meet the anticipated increase in renewable energy and at the same time, to achieve the energy efficiency goals and develop demand response markets, as well as Smart Grids and Smart metering deployment, a full review of the approach taken to regulation is required.

Brussels, 27 July 2012