

Response to Consultation on European Energy Regulators' 2010 Work Programme

From: Bas Batelaan, Scottish and Southern Energy

Date: 6 November 2009

Dear Mrs Geitona,

SSE welcomes the opportunity to comment on the 2010 ERGEG Work Programme and we believe that your general approach and the objectives you have set reflect the priorities of the energy industry. Please see below our comments on each of the seven key areas.

- The 3rd Package

We agree that the momentum of the 3rd Package negotiations should not be lost and that the Framework Guidelines are an important part of this process. We intend to actively participate in any consultations and hearings related to this deliverable.

- Security of Supply

We consider that security of supply will continue to be an important issue for the EU over the coming year and welcome ERGEG's input on the matter.

- Affordability and Consumer Issues

We agree that proposals for concrete implementation measures on the provisions on energy poverty and smart metering are a very important area of work. However, we would like to remind ERGEG that, within the UK, much work has already been carried out in this area and care should be taken to avoid duplication of effort. We intend to be actively involved in any consultations and hearings on this subject.

- The Climate and Energy Package

We agree that this is a very important area of work and welcome ERGEG's input. We intend to be actively involved in any consultations or hearings on this subject. We are particularly keen to understand what ERGEG intends to do to ensure that regulatory and tariffing frameworks in each Member State are non-discriminatory and encouraging of renewable generation.

- Financial Services

We consider this to be a less important area of work but do intend to be actively involved in consultations and hearings on the matter. We are keen to understand ERGEG's

thoughts on the impact of an energy specific Market Abuse Framework on the existing financial services regulations of each Member State.

- Regional Market Integration

We consider this to be a very important area of work. We intend to be actively involved in hearings and consultations. In particular, we would welcome ERGEG's input on the harmonisation of tariffs and tariff methodologies across the EU as we consider that there are a number of barriers to cross border trade at present.

- External Relations

We consider this to be a less important area of work and would not intend to be actively involved in this matter.

If you have any questions about this, don't hesitate to contact me.

Best regards,

Bas Batelaan
Head of European Affairs
Scottish and Southern Energy
Scotland House
Rond-Point Schuman 6
B-1040 Brussels
Belgium
Tel. +32 (0)22 828 401
Mob. +32 (0)47 403 2907