

Production

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CEER

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Comments to Draft of CEER Work Programme 2013

General comments

Council of European Energy Regulators, CEER, has invited for comments on their draft of a Working Programme 2013, dated 18 June 2012. At the same time, ACER, invited for comments on their drafted working programme.

Swedenergy¹ appreciates the openness and the opportunity to comment. We especially welcome the new approach to launch CEER and ACER working programme at the same time.

An annual working programme is valuable, but one year is also a short period of time. Hence, a midterm perspective as an introduction would be beneficial, such as to add a vision, strategy and focus areas for nearest years. This is important in areas where the focus and targets needs to be moved from year 2014 to 2020 for development of a sustainable and efficient market.

Priority area – Customer

Swedenergy supports the focus on customers' role and right. We welcome initiatives that strengthen customers' position and support energy companies in this matter. It's essential to assure harmonised rules and a good balance between customer interest, efficiency and sustainability in a well functioning market. Active and satisfied customers is an important part of the market.

The development of a 2020 vision of Europe Energy customers is an important topic. It's vital to have midterm focus and a broad perspective and it needs a lot of considerations. Customers' situations and need differs in different part of Europe. Customers' rights and empowerment is important, but in many matters energy is not different from other products and services. In that respect energy products and services are not needed to be treated specially. Swedenergy supports development that gives real and true value and benefits for customer.

¹ Swedenergy - the voice of the Swedish energy industry - represents Swedish companies involved in electricity supply (distribution, retail, generation) and our comments only refer to electricity part of CEER's working area.



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Priority area - development of competitive wholesale and retail energy market

Swedenergy supports a development of the European market, both wholesale and retail. Many important steps are taken but we also face many challenges.

When developing the market and related regulation, we support the topics to be solved by utilizing a holistic view and with focus on functional requirements, not details. In addition regulation needs to be stable over time. Rules and regulation needs to be developed from solid ground. To utilize a system view gives needed conditions for stability, which means stable conditions for a sound market.

Swedenergy would like to emphasise that with a well considered system view and market based solutions, the market will be developed by "outside and in"-perspective that benefits both customers and market actors. It's essential that market development is driven by market based solutions. All market actors, despite type of ownership, need to follow the same market rules. Clear and equal conditions are a requirement for a well functioning market and must characterise all proposals for development.

Priority area - New legislation / Policy development

Swedenergy supports CEER's view that sustainability, new infrastructure and market integrity are relevant and important areas, both for 2013 and in midterm perspective. We would like to emphasise the need of a holistic view and to avoid seeing and solving these highly important topics as separate issues.

As example, high ambitions in these areas will have impact on the energy market functions as well as the customers. Both European Commission and CEER are focusing on affordable prices for customers. Pricing is not only a matter for the energy companies and their customer but also regulators. High ambitions and targets for reaching a sustainable future, climate targets and keep a high level of security of supply, will lead to increased energy prices. To focus on energy efficiency is a necessary part of the solutions, but not a guarantee for keeping the costs down. Since the targets are clear, we want a sustainable future, all stakeholders need to be aware of the effects on energy prices. In addition, all new requirements, new market functions and features and demands on technical development are related to cost. Regulators shall be aware of cost and the effect on pricing towards customer. Hence, it is important with cost-benefit analysis and to analyse consequences of all new reforms, regulations and demands, to assure that all actions give true benefits for the customer at minimum cost.

To conclude, Swedenergy supports the areas CEER gives priority to in the coming year, but we emphasise the need of holistic view. It's crucial to see all these areas as part of a total system that shall be efficient and sustainable.



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